

FINAL

ENVIRONMENTAL IMPACT REPORT

CARPINTERIA RINCON TRAIL PROJECT
STATE CLEARINGHOUSE NUMBER 2020100582

Prepared for:

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Acronyms and Abbreviations

Acronym or Abbreviation	Definition
µg/m ³	micrograms per cubic meter
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADL	aerially deposited lead
ADT	average daily trip
AFY	acre-feet per year
amsl	above mean sea level
APE	area of potential effect
APN	Assessor's Parcel Number
ARB	Architectural Review Board
AST	aboveground storage tank
ATCM	Airborne Toxic Control Measure
BAR	Board of Architectural Review
Basin Plan	Water Quality Control Plan for the Central Coast Basin
BMPs	Best Management Practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalARP	California Accidental Release Prevention Program
CalEEMOD	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalOES	Governor's Office of Emergency Services
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CAWet	California Waste Extraction Test
CBC	California Building Code
CCIC	Central Coast Information Center
CCR	California Code of Regulations
CDB	coastal development permit
CDD/P&D	Community Development Department/Planning & Development
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	California Fire Code
CGS	California Geological Survey
CH ₄	methane
CHRIS	California Historical Resources Information System
CIDH	cast-in-drilled hole
City	City of Carpinteria

Acronym or Abbreviation	Definition
CGP	Construction General Permit
CLUP	Coastal Land Use Plan
CNCL	California Natural Community List
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
County	County of Santa Barbara
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
C RTP	Cultural Resource Treatment Plan
CSFPD	Carpinteria-Summerland Fire Protection District
CUP	conditional use permit
CUPAs	Certified Unified Program Agencies
CVWD	Carpenteria Valley Water District
CY	cubic yards
dB	decibel
dBA	A-weighted decibel
DOC	California Department of Conservation
DOT	U.S. Department of Transportation
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
DVP	development plan permit
ECAP	Energy and Climate Action Plan
EERP	Enforcement and Emergency Response Program
EIA	U.S. Energy Information Administration
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act of 2007
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
ESH	environmentally sensitive habitat
ESHA	environmentally sensitive habitat area
EV	electric vehicle
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulation
FE	federally endangered
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FP	fully protected

Acronym or Abbreviation	Definition
FPPA	Farmland Protection Policy Act
FRA	Federal Railroad Administration
FT	federally threatened
FTA	Federal Transit Administration
GHG	greenhouse gas
GWP	global warming potential
HCFCs	hydrochlorofluorocarbons
HERO	Human and Ecological Risk Office
HFC	hydrofluorocarbons
HHRA	Human Health Risk Assessment
Hz	Hertz
IEPR	Integrated Energy Policy Report
IPCC	Intergovernmental Panel on Climate Change
kBTU	thousand British thermal units
LCP	local coastal plan
L _{dn}	average A-weighted noise level
L _{eq}	equivalent noise level
L _{max}	maximum A-weighted sound level
L _{min}	minimum A-weighted sound level
LOS	Level of Service
LUDC	Land Use Development Code
LUST	leaking underground storage tank
MCV2	Manual of California Vegetation, 2 nd edition
mg/kg	milligrams per kilogram
MLD	most likely descendant
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric ton
MND	Mitigated Negative Declaration
MS4	Municipal Separate Storm Sewer System
MT	metric ton
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NHTSA	National Highway Traffic Safety Administration
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
O ₃	ozone
OPR	Governor's Office of Planning and Research
PCRs	Post Construction Requirements
PFCs	perfluorocarbons
PGA	peak ground acceleration
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns

Acronym or Abbreviation	Definition
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to 10 microns
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
Preserve	Carpinteria Bluffs Nature Preserve
PSR	Project Study Report
RCRA	Resource Conservation and Recovery Act
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Allocation
RMS	root mean square
ROC	reactive organic compound
RPS	Renewables Portfolio Standard
RSLs	Residential Screening Levels
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAB	State Allocation Board
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SBCAG	Santa Barbara County Association of Governments
SBCAPCD	Santa Barbara County Air Pollution Control District
SBCCO	Santa Barbara County Code of Ordinance
SCCAB	South Central Coast Air Basin
SBCOEM	Santa Barbara County Office of Emergency Management
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SDL	state delisted
SE	state endangered
SF ₆	sulfur hexafluoride
SLF	Sacred Lands File
SLPC	short-lived climate pollutants
SLRVA	Sea Level Rise Vulnerability Assessment
SLs	screening levels
SNA	state not applicable
SNR	state no rank
SO ₂	sulfur dioxide
SO _x	sulfur oxides
SPCC	Spill Prevention, Control and Countermeasure
SR	State Route
SRA	State Responsibility Area
SSC	Species of Special Concern
ST	state threatened
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TCM	Transportation Control Measures
TCR	Tribal Cultural Resource
TDM	transportation demand management

Acronym or Abbreviation	Definition
UPRR	Union Pacific Railroad
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
UWMP Act	Urban Water Management Planning Act
VdB	vibration decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VMТ	vehicle miles traveled
VOC	volatile organic compound
WEAP	Workers Environmental Awareness Program
WL	Watch List
WQO	water quality objectives
ZEV	zero emissions vehicle

1 Preface

1.1 Purpose

This Final Environmental Impact Report (EIR) has been prepared by the City of Carpinteria (City) for the Carpinteria Rincon Trail Project (project or proposed project). This Final EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (Cal. Pub. Res. Code, Section 21000 et. seq., as amended) and implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.).

Before approving a project, CEQA requires the lead agency to prepare and certify a Final EIR. The City has the principal responsibility for approval of the proposed project and is therefore considered the lead agency under CEQA Section 21067. According to the CEQA Guidelines, Section 15132, the Final EIR shall consist of:

- The Draft EIR or a revision of the Draft EIR
- Comments and recommendations received on the Draft EIR either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the Draft EIR
- The responses of the lead agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the lead agency

1.2 Format of the Final EIR

This Final EIR consists of the March 2021 Draft EIR and the following three chapters:

1.0 Preface. This chapter summarizes the contents of the Final EIR, the environmental review process, and several minor updates that occurred in the Draft EIR subsequent to the release of the Final EIR for public review.

2.0 Response to Comments. During the 45-day public review period for the Draft EIR, 52 comment letters were received. This chapter contains these comment letters and the City's responses to the comments.

3.0 Errata. Comments that are addressed in Chapter 2.0 may have resulted in minor revisions to the information contained in the March 2021 Draft EIR. Where necessary, deletions to the text are shown in ~~strikeout~~ and additions to the text are shown in underline in all chapters of the Draft EIR where revisions were deemed necessary as a result of received comments. Additionally, through the certification of this Final EIR, where the term "Draft EIR" is used in the text, this is now deemed to be "Final EIR."

1.3 Environmental Review Process

1.3.1 Notice of Preparation

CEQA requires preparation of an EIR when there is substantial evidence supporting a fair argument that a proposed project may have a significant effect on the environment. The purpose of an EIR is to provide decision makers, public agencies, and the general public with an objective and informational document that fully discloses the environmental effects of the proposed project. The EIR process is intended to facilitate the objective evaluation of

potentially significant direct, indirect, and cumulative impacts of the proposed project, and to identify feasible mitigation measures and alternatives that would reduce or avoid the proposed project's significant effects. In addition, CEQA requires that an EIR identify adverse impacts determined to be significant after mitigation.

In accordance with the CEQA Guidelines, a Notice of Preparation (NOP) was distributed on October 30, 2020, to public agencies, organizations, and interested individuals. The purpose of the NOP was to provide notification that the City plans to prepare an EIR and to solicit input on the scope and content of the EIR. A public scoping meeting was also held via Zoom video conference on November 17, 2021. The purpose of this meeting was to seek input from public agencies and the general public regarding the potential environmental impacts of the proposed project. Various agencies, organizations, and individuals submitted 78 written comment letters in response to the NOP. These letters and the NOP were included in Appendix A of the Draft EIR.

1.3.2 Noticing and Availability of the Draft EIR

The Draft EIR was made available for public review and comment pursuant to CEQA Guidelines Section 15087. The 45-day public review period for the Draft EIR started on March 12, 2020 and concluded on April 26, 2021. At the beginning of the public review period, an electronic copy of the Draft EIR and an electronic copy of the Notice of Completion (NOC) were submitted to the State Clearinghouse. Relevant State agencies received electronic copies of the documents. A Notice of Availability (NOA) was distributed to interested parties and filed with the State Clearinghouse. The NOA described where the document was available and how to submit comments on the Draft EIR. The NOA and Draft EIR were also made available to be viewed on the City website at:

<https://carpinteriaca.gov/public-works/engineering-division/rincon-multi-use-trail/>

During the 45-day public review period, a public hearing was held virtually over Zoom by the City of Carpinteria Environmental Review Committee (ERC) on April 13, 2021. A total of 52 agency, organization, and individual comment letters were received and are included in Chapter 2, Responses to Comments, of this Final EIR.

1.3.3 Final EIR

The Final EIR addresses the comments received during the public review period and includes minor changes to the text of the Draft EIR in accordance with comments that necessitated revisions. This Final EIR will be presented to City decision-makers for potential certification as the environmental document for the proposed project. All agencies who commented on the Draft EIR will be provided with a copy of the Final EIR, pursuant to CEQA Guidelines Section 15088(b). The Final EIR will also be posted on the City's website at:

<https://carpinteriaca.gov/public-works/engineering-division/rincon-multi-use-trail/>

Pursuant to CEQA Guidelines Section 15091, the City shall make findings for each of the significant effects identified in this EIR and shall support the findings with substantial evidence in the record. After considering the Final EIR in conjunction with making findings under Section 15091, the lead agency may decide whether or how to approve or carry out the project. When a lead agency approves a project that will result in the occurrence of significant effects that are identified in the Final EIR, the agency is required by CEQA to state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record (a statement of findings). A "statement of findings" will be prepared pursuant to CEQA Guidelines Section 15093 and supported by substantial evidence in the record.

1.4 Revisions to the Draft EIR

The comments received during the public review period for the Draft EIR resulted in several minor clarifications and modifications in the text of the March 2021 Draft EIR. In addition, minor editorial corrections have been made in sections of the Draft EIR. These changes are included as part of the Final EIR, to be presented to City decision makers for certification and project approval.

CEQA Guidelines Section 15088.5 identifies when a lead agency must recirculate an EIR. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR but before certification of the Final EIR. Information includes changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not considered significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. As defined in CEQA Guidelines Section 15088.5(a), significant new information requiring recirculation includes the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The minor clarifications, modifications, and editorial corrections that were made to the Draft EIR are shown in Chapter 3.0, Changes to the Draft EIR, of this Final EIR. None of the revisions that have been made to the EIR resulted in new significant impacts; none of the revisions resulted in a substantial increase in the severity of an environmental impact identified in the Draft EIR; and, none of the revisions brought forth a feasible project alternative or mitigation measure that is considerably different from those set forth in the Draft EIR. Furthermore, the revisions do not cause the Draft EIR to be so fundamentally flawed that it precludes meaningful public review. As none of the CEQA criteria for recirculation have been met, recirculation of the EIR is not warranted. As stated in CEQA Guidelines Section 15088.5(b), "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

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2 Responses to Comments

The Draft EIR was circulated for public review on March 12, 2021 through April 26, 2021, in accordance with the 45-day comment period required under Section 15105(a) of the CEQA Guidelines. A total of 52 comment letters were received on the Draft EIR from agencies, organizations, and individuals as shown in the list below. In response to the comments received during public review and to City of Carpinteria (City) staff input subsequent to distribution of the Draft EIR, minor revisions, clarifications, and/or additions have been made to the document which do not change the conclusions of the Final EIR regarding the project's potential environmental impacts and required mitigation. These minor revisions do not represent significant new information. No new significant environmental impacts would occur from these modifications, and similarly, no substantial increase in the severity of environmental impacts would occur. When a comment is not directed to significant environmental issues, the responses indicate that the comment has been acknowledged and no further response is necessary.

The list of commenters and the unique letter-number designators for each letter are shown in Table RTC-1, List of Commenters. Individual comments within each letter are bracketed and subsequently numbered in the right-hand margin of the comment letter. Bracketed/numbered comment letters are placed before the responses to the letter provided below.

Four topics or issue areas were identified in a large percentage of the comment letters, including concerns about the air flow analysis and related impacts to recreation (soaring opportunities), the magnitude of earthwork or landform modification, impacts to biological resources, and the range of alternatives considered. Since these issue areas were present in multiple comment letters, Dudek created a global response addressing each of these areas. The global responses are presented first, preceding the individual comment letters and responses.

Table RTC-1. List of Commenters

Commenter	Letter No.
State Agency	
Southern California Gas	S-1
California Public Utilities Commission	S-2
California Coastal Commission	S-3
California Department of Fish and Wildlife	S-4
Local Agency	
Santa Barbara County Association of Governments	L-1
Carpinteria Sanitary District	L-2
Carpinteria Sanitary District	L-2a
County of Santa Barbara Planning Department	L-3
County of Ventura Resource Management Agency	L-4
Tribes	
Northern Chumash Tribal Council	T-1
Organizations	
Friends of Bates Beach	O-1
Individuals	
Aaron LaPlante	I-1
E. Arciniega	I-2
E. Arciniega	I-3
Aaron LaPlante	I-4

Table RTC-1. List of Commenters

Commenter	Letter No.
E. Arciniega	I-5
Scott Wuebber	I-6
Myles Connolly	I-7
Ottis Gillespie	I-8
Laura Davalos, PT, DPT	I-9
E. Arciniega	I-10
Ottis Gillespie	I-11
Desmond	I-12
Caleb Phillips	I-13
Michael Hilbreath	I-14
Brandon Stingham	I-15
Jamie Bishop	I-16
Wayne Michelsen	I-17
Randall McCormick	I-18
Mike Harrington	I-19
Adam Zerkel	I-20
Ottis Gillespie	I-21
Robin Cushman	I-22
Ryan Soares	I-23
Jon Lewis	I-24
Betty Winholtz	I-25
Riebeeck van Niekerk	I-26
Jeffrey Longcor	I-27
Jason Lombard	I-28
John Greynald	I-29
Ajay Rajamani	I-30
Rob Sporrer	I-31
Ottis Gillespie	I-32
Tim Barker	I-33
Karl Cameron	I-34
William C. Prechter	I-35
Jorge Granier	I-36
George Jimenez	I-37
Mark Rayburn Patterson, PhD	I-38
Derek Musashe	I-39
Morgan Waterman de Granier	I-40
Derek Arculli	I-41

Global Responses for Topics Common to Multiple Comment Letters

GR1: Impacts Upon Soaring Opportunities / Airflow Study

A number of commenters suggested that the Recreation Section should not have included a discussion on the fundamentals of soaring or Federal Aviation Administration (FAA) regulations pertaining to soaring activities, and also expressed skepticism regarding the conclusions of the airflow analysis study and the determination of a less than significant project impact on existing soaring opportunities. The response below is intended to address these issues, which are common to multiple comments received.

Discussion of Soaring Fundamentals

Responses to the Notice of Preparation (NOP) by members of the soaring community identified the need to assess impacts of the Project on existing opportunities for soaring in the air space above the Project alignment. While members of the soaring community are required to possess an understanding of the principles affecting paragliding or hang-gliding flight, including factors that influence launch and flight duration, members of the general public and decision-makers are unlikely to have familiarity with such principles. Consequently, it is appropriate to provide a summary of fundamentals pertaining to hang-gliding and paragliding, in order for the public to have a basic understanding of the physical conditions needed to support soaring.

The fundamentals description was derived from the *Elementary Pilot Training Guide* (British Hang-gliding and Paragliding Association, 2021). As a reference for beginning soaring pilots, the guide provides straight-forward discussion of flight principles and wind effects for soaring, using explanations that should be understandable for new pilots as well as interested individuals that do not engage in soaring.

Federal Aviation Administration (FAA) Regulations on Soaring

For each environmental issue area (organized by individual sections or chapters), the EIR provides a summary of the federal, state and local regulations that pertain to the given issue area. Adopted General Plan Policies, ordinances, and regulations, often govern the activities or development allowed on a given property or may be a component of the significance thresholds established for that issue area.

In that NOP responses identified the need to address Project impacts on existing opportunities for soaring in the air space above the Project alignment, it is appropriate to present FAA regulations on soaring as part of the regulatory discussion in the Recreation Section of the EIR.

Airflow Analysis Study

Multiple commenters expressed the perception that the Airflow Analysis Report “specifically states it is based on theory and not intended for this purpose.” This perception is evidently based upon the disclaimer provided at the end of the report, which is standard for an aerodynamics analysis of this type. The report disclaimer neither represents the study is based on theory alone, nor that the conclusions are inapplicable to the analysis of airflow alterations resulting from the proposed topographic modifications. The analysis methodology and the intent of the disclaimer are discussed in detail below.

Modeling is commonly employed in the evaluation of environmental effects that could result from a proposed action. Agricultural land conversion, air quality emissions, noise levels, and traffic generation typically are analyzed with the aid of models. The models use equations, which are based upon the measurement of various characteristics

associated with existing activities, to predict these same characteristics for a proposed new project or action. As the number of measurements of characteristics from existing activities increases, the statistical integrity of the data and equations improves, and the model results become more accurate; but the model results remain a prediction, and are not guaranteed to 100 percent reflect actual future conditions. With respect to environmental aerodynamics, a comprehensive model for the prediction of airflow alterations from topographic modification has not been developed at this time (Luzzatto-Feliz, *Email Communication*, June 2021). The airflow analysis report (*Airflow Analysis for the Proposed Regrading of the Rincon Bluffs*, Paolo Luzzatto-Feliz, PhD, January 22, 2021) therefore incorporates existing data from field measurements of air flow over large-scale topographic features, from aerodynamic experiments conducted with scaled models in wind tunnels, from engineering standards for wind stress on buildings, and from published literature addressing wind flow over topography as related to soaring activities, to evaluate potential changes in airflow dynamics associated with the project.

Wind amplification is an important concept in the discussion of air flow over topography. When a mass of air which is moving horizontally over a level surface (e.g., wind blowing over the ocean surface) encounters a hill or cliff, the air volume in front of the hill is compressed into a smaller volume which flows at a faster rate over the hill/cliff, compared to the remainder of the air mass much higher above the hill. In other words, the wind speed approaching the hill at elevations below the top of the hill will be lower than the wind speed as it passes over the top of the hill. As discussed in the air flow analysis study, extensive experiments in 1977 with scaled models in a wind tunnel investigated the effects of changing the angle of the slope, relative to the amount of wind amplification produced by the slope. These original wind tunnel experiments concluded that increasing the angle of the slope for gentle slopes (i.e., slopes from 4:1 or 14 degrees to 2:1 or 27 degrees) did result in wind speed increases. However, for slopes steeper than 2:1, the maximum flow velocity no longer increased with an increase in the slope angle; and likewise decreases in slope angle that do not reduce the slope to less than 2:1 did not decrease the maximum wind velocity. Equations from the wind tunnel experiments were developed to address the wind amplification related to steepness of the slope; subsequent researchers have conducted environmental measurements of wind flow over slopes with varying slope angle, and showed that, for the front and top regions of the topography, field measurements at full scale agreed closely with the wind tunnel experiments. It should be noted that the existing bluff face along the project site has a slope angle greater than 2:1, and the resulting slope angle following the regrading under the proposed project or under Alternative 3 would also maintain a slope angle greater than 2:1. Because of this, horizontal wind speeds at low altitudes over the bluff top are not expected to be altered by the project.

Vertical wind speed, or uplift, is of interest to the soaring community and is also produced when horizontal wind encounters a slope. Soaring literature contains simple equations for converting horizontal wind speed to a vertical wind speed component, which involves the sine of the slope angle. These equations are again based upon those developed from wind tunnel experiments. For more complex topography, for instance, a slope that has sections of varying steepness or which includes benches, researchers have identified an appropriate semi-empirical approach to estimate uplift. The semi-empirical approach generally involves applying the equations developed from wind tunnel experiments using simple slope models, compare the prediction results of these equations against data from vertical air flow measurements on existing large-scale complex topography in the environment, and make adjustments to the applied equation until the predicted vertical wind speeds are close to those measured. Researchers have identified two approaches that have been successful for the prediction of vertical wind velocities produced from flow over complex topography. The first approach is to use the mean or average slope degree across the entire face of the slope. The second approach uses the average slope degree over the upper portion of the slope (approximately the top third of the slope face), which is immediately below the wind flow amplification zone.

The air flow analysis report employs both of these approaches to predict changes to vertical wind velocities from slope angle modification (i.e., regrading), and reports the results of each approach.

The vertical wind speed prediction approach using the average slope degree of the upper third portion of the slope is based upon research and environmental wind measurements by Crawley & Schmanske (1994). The equation resulting from this approach was specifically focused on vertical wind speeds closer to the surface of the topography, which are important for low elevation soaring operations including take-off and landing maneuvers. Using this approach, vertical wind speeds within the zone that extends upward approximately 20 feet from the bluff top are predicted to be reduced by no more than 10 percent. This predicted reduction in vertical wind speed at low altitudes addresses the re-grading of the bluff face for the proposed project and for Alternative 3. This equation and method is considered to be most accurate within approximately 20 vertical feet of the evaluated topographic feature; the other equation (described below) is appropriate for predicting wind speed alterations at higher elevations above the ground.

The vertical wind speed prediction approach using the average slope degree of the entire slope was developed by researchers to provide a conservative assessment of potential wind speed alterations from slope modification, at altitudes up to a height (elevation) equal to the height of the topographic feature. This approach predicts a potentially conservative vertical wind speed reduction from proposed project regrading of between 25 and 30 percent for elevations within 30 feet above the bluff-top, and approximately 30 percent at elevations above 30 feet over the bluff. For Alternative 3, this approach predicts a vertical wind speed reduction of approximately 20 percent for elevations up to approximately 120 feet above the bluff top.

The disclaimer at the end of the airflow analysis report (Page 11, Luzzatto-Feliz, January 2021) is standard for the type of predictive modeling contained in the report. Sufficient research was performed in the study to identify and compare technical experts' analytical approaches which included wind tunnel experiment results, environmental measurements of horizontal and vertical wind velocity effects associated with topography, and calculations employed for estimating wind velocities for soaring. As indicated in the airflow analysis report, results from the application of appropriate formulas to predict wind velocity changes from the project were checked against published results from various research and were found to compare favorably (Page 9, Luzzatto-Feliz, January 2021). The disclaimer is intended simply to indicate the analysis is predictive in nature, and as with all modeling efforts, future conditions could vary slightly from the predicted conditions.

Conclusion of Less Than Significant Impact Regarding Soaring Opportunities

Published data for the Torrey Pines Gliderport indicate tandem hang-gliders (which can carry pilot and passenger or instructor and student) require a horizontal wind speed between 7 and 15 mph, while tandem para-gliders require wind speed between 10 and 18 mph. According to the U.S. Hang Gliding and Paragliding Association, the ideal wind speed for launching solo gliders is from 5 to 20 mph (<https://www.ushpa.org/page/hang-gliding-frequently-asked-questions>). This horizontal wind speed range ensures the air movement across the "wing" of the glider is sufficient to produce lift, thereby making launch (take-off) feasible. These data reflect a range of at least 50 percent wind speed across which launch of tandem gliders is feasible, with a range of 75 percent for solo glider launch. Research findings from the air flow analysis indicate, that for slopes steeper than 2:1 (27 degrees), a change to the average slope face does not result in changes to air flow amplification or horizontal wind speeds along the top of the slope. (Page 11, Luzzatto-Feliz, January 2021). Existing slopes, and those resulting from the project or Alternative 3, would each remain greater than 2:1. Hence no decrease in the horizontal wind speeds immediately above the bluff are anticipated from the project, and the ability to launch gliders from areas adjacent to the project alignment would not be affected.

Vertical wind velocities, which affect the ability for a hang-glider or para-glider to increase their altitude and thus extend flight duration, could be reduced in the air space above the trail alignment under the Project and Alternative 3, compared to existing conditions. Using an approach following the methodology of an analysis of topographic effects upon air flow that was conducted specifically for soaring that, as discussed above, employed a specific altitude for determining vertical wind speeds from different slope angles and using the average slope degree for the upper slope, the air flow analysis predicts only a maximum of 10 percent reduction in the vertical wind speeds within approximately 20 vertical feet of the bluff top (refer to additional explanation above). Thus, very low altitude soaring flights over the project alignment are not expected to be substantially affected under most conditions.

Vertical wind velocities at altitudes greater than 30 feet above the bluff face could be reduced by up to 30 percent, meaning there could be fewer opportunities for gliders to gain altitude and extend the duration of their flights in the area above the project alignment, as compared to existing conditions. Based again upon the reported 50 percent range in horizontal wind speeds for successful launch and flight at Torrey Pine Gliderport, and a 75 percent wind speed range for solo glider launch (USHPA), a reduction by 30 percent of the vertical wind speeds at higher elevations over the project alignment is not expected to result in a substantial decrease in soaring opportunities. In addition, the existing bluff face to the west of the trail crossing over the UPRR alignment would not be modified by the project, and therefore ambient air flow conditions along this bluff face would remain unchanged.

Further, as discussed in Section 3.11.4 of the Draft EIR, CEQA requires an analysis of physical impacts to the environment; it does not require analysis of social and economic impacts resulting from a project. (*Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 566, 579-580; CEQA Guidelines, § 15064(e).) The airflow analysis report demonstrates that any potential adverse impacts on the usability of air space above the proposed trail alignment are unlikely to cause significant physical impacts on the environment. (See, e.g., *Chico Advocates for a Responsible Economy v. City of Chico* (2019) 40 Cal.App.5th 839 (reasoning that loss of convenience is merely an example of a social problem, and without an accompanying physical change to the environment, CEQA does not require its analysis); CEQA Guidelines, § 15131(a).) Section 3.3.4 of the Final EIR further evaluates the extent to which the project's topographic changes associated with regrading result in a less than significant environmental impact to migratory avian species. As such, the airflow analysis report provides an expert opinion, based on substantial evidence, that the project will not result in a significant environmental impact.

GR2: Earthwork/Landform Modification

Several commenters highlighted concerns with the volume of earthwork necessary to implement the proposed project and indicated that additional effort should be completed to identify alternatives for trail development that could further reduce earthwork volumes and landform modification. One commenter correctly provided a comparison of the amount of earthwork between the original trail proposal (2015) and the current proposal, indicating the original design involved substantially less earthwork. However, that original design was later found via geotechnical investigation to be infeasible due to the presence of active landslide areas along the originally proposed (2015) trail alignment (Carpinteria Rincon Trail Project Draft EIR, Page 6-9).

With respect to the modification of landforms, the proposed project would re-contour manufactured slopes originally created for the past and current UPRR alignments, the former State Highway 2, and U.S. Highway 101. The re-manufacture of such slopes would result in minimal change to the existing appearance of the slopes, in that they already exhibit more regular planar characteristics than the undulating surfaces that pre-dated the transportation corridor mass grading activities affecting all of the slopes along the trail alignment. Existing sparse vegetation on sloped areas would be replaced with an appropriate assemblage of native, drought-tolerant species using hydro-

seeding and individual container plants, such that short-term visual impacts from earthwork and vegetation removal would be adequately mitigated.

The City and County local coastal plans do reference Coastal Act Section 30251, which requires that the scenic and visual qualities of coastal areas shall be considered and protected, and that new development is sited and designed to minimize alteration of natural land forms and also be subordinate to the character of its setting. The project is consistent with Coastal Act Section 30251 based on the following considerations included in the trail design:

- a) Earthwork would largely affect manufactured slope areas—containing debris and excavated material from previous railroad and state highway construction projects—not natural landforms. The top elevation of local ridges within the project area would be preserved, thus maintaining the most visible aspect of site topography which relates to the ridges and bluff-top east and west of the project site.
- b) The trail itself would remain a subordinate feature in the visual environment of the site, with a scale that would not draw attention away from the high slopes and ridges against which it is set. The resulting landforms from earthwork to construct the trail would have a similar appearance to both existing slopes along the alignment, as well as to the manufactured slopes extending eastward and westward from the project alignment along the UPRR and U.S. Highway 101 corridors.
- c) As part of the remanufacturing of the ocean-side slope east of the existing UPRR alignment, the abandoned former railroad bench cut would be largely filled in, such that the bluff face would continue to have a prominent bench cut into its face, but in a new location slightly higher on the bluff face in order to achieve the necessary trail slope profile. In this respect, the visual condition of a bench cut traversing the face of the manufactured slope would not differ significantly from the existing condition.
- d) Once re-manufactured slopes are revegetated (as proposed) such slopes would be more compatible with the natural surrounding than the historic cut slopes remaining from the railroad and state highway construction. Because the project proposes to reduce the slope angle of manufactured slopes (compared to existing), run-off velocity for storm run-off would be reduced, erosion of the bluff face would be reduced, and additional moisture would be retained to support re-planted native and drought-tolerant plants.

With regard to the smaller volume of earthwork identified for the original trail proposal, substantial height retaining walls were proposed as an alternative to earthwork. The original trail design would have necessitated approximately 1,000 feet of retaining wall, with a maximum height of 14 feet. That design was prepared without the benefit of specific geotechnical investigation methods, which have subsequently identified deep-seated landslides along the former extensive switchback section that would have extended eastward from the UPRR rail crossing. The original alignment, due to the presence of severely unstable slope sections, has since been deemed infeasible by the project engineers. Another aspect of the original retaining wall design is that they were intended to anchor the trail itself but would not have addressed soil creep or rock fall from steep manufactured slopes above the elevation of the trail. Thus, trail users would not have been as protected from risk of falling earth materials and the trail itself could have been subject to more intensive maintenance or repair activities. The current design anchors the trail itself on one bench (situated on a low angle slope), with a more stable low-angle slope above it.

Consequently, while earthwork volumes would increase under the current proposal, the resulting slopes and landforms would have greater long-term stability, retaining walls (which are generally more prominent visually) would be completely avoided, and slope angles more conducive to successful revegetation would result, as compared to the original design from 2015. With regard to a proposal which respects the scenic qualities of coastal

areas and remains visually subordinate to the character of the setting, the current proposal is more consistent with coastal policy mandates than the original 2015 alignment. In addition, as discussed above, the original alignment that theoretically could have involved lower earthwork volumes has been proven infeasible. Any trail project within this highly modified environment characterized by remnant manufactured slopes from current and relic transportation corridors by necessity must address correction of unstable steep slope faces, leading to what could appear to be “excessive” grading.

The engineering design for Alternative 3 was specifically driven by an intent to minimize overall project earthwork volumes. Alternative 3 would result in a reduction of 40 cubic yards of excavation compared to the proposed project (with exported material reduced by 121 cubic yards). In this regard, Alternative 3 represents the greatest opportunity to minimize excavation and exported soil earthwork volumes to implement the project. Once again, it is worth reiterating that the slopes along the trail alignment have been subject to previous modification to accommodate transportation projects, and therefore the proposed earthwork would affect manufactured slopes and not natural landforms. Additionally, the remnant slope faces in most cases are steeper than current engineering standards would recommend (and which would be corrected via the project), and the grading to create the benches for the trail are dictated, in part, by the maximum grade percent which is acceptable under ADA. In fact, an approximately 690 foot portion of the trail south of the UPRR crossing with Alternative 3 would marginally exceed the 5 percent maximum ADA trail slope face (this 690-foot segment of the trail would be constructed with trail surface of 6 percent slope) in order to capitalize on as much of the former railroad bench as possible and thereby minimize project earthwork.

The engineering design evaluation to create Alternative 3 informed the project development team, and the proposed project has been subsequently revised to remove the previously proposed mid-elevation bench above the trail segment south of the UPRR alignment. This design change reduces the earthwork volume by 11,346 CY (9.6 percent reduction) for the currently proposed version of the project, compared to the previous version of the proposed project evaluated in the Draft EIR. Alternative 3 further reduces the volume of excavated and exported materials (40 CY less excavation, 121 CY less exported earth material). Alternative 4 was determined to have a very similar total volume of earthwork as the proposed project but would increase export material volumes by approximately 10,000 CY (as compared to the project). Alternative 2 was initially thought to involve substantially less earthwork, but additional geotechnical investigations indicate the presence of extensive landslide features that would require massive retaining structures; as well, available engineering and geotechnical methods for stabilizing the landslide mass are not known to be feasible. The alternatives investigated represent three different potential alignments for the trail, with the degree of topographic modification being a chief factor in the identification of potential alignments. The earthwork for each alignment has been identified for comparison, with total variance between the most and least volume of earthwork at approximately 10 percent. Consequently, the EIR authors do not believe that additional alternatives for the purpose of minimizing earthwork volumes would be warranted in order to meet the criteria for sufficiency of alternatives analysis under CEQA Section 15126.6(d).

GR3: Biological Resources

Commenters have indicated that the field surveys have failed to detect some plant and wildlife species that are present within the project alignment, and that further alternatives should be developed and studied in order to avoid or minimize project impacts upon environmentally sensitive habitat areas (ESHA).

Dudek biologists have conducted general biological resources surveys of the project site in multiple instances, during the spring season of five separate years (2011, 2018, 2019, 2020 and 2021). Because of the history of the design development and subsequent re-design efforts for the proposed trail, the site has been evaluated for the

presence of biological resources much more extensively than typically occurs for a development proposal. Dudek biologists are therefore confident that all important biological resources present within and adjacent to the project alignment and all alternatives have been identified.

According to City of Carpinteria General Plan/Local Coastal Land Use Plan Figure OSC-1, the entire area east of Bailard Avenue and lying between U.S. Highway 101 and the beach is included in an ESHA overlay. While not all area included within the ESHA overlay may have sensitive resources present, it would not evidently be feasible to implement a trail connecting the eastern terminus of Carpinteria Avenue to the northern terminus of the Coast Bike trail (at the southern end of Rincon Beach Park) without impacting some area designated as ESHA. It should be noted that no ESHA designation has been applied by the County of Santa Barbara for the portion of the Rincon Trail alignment within their jurisdiction.

While the total native plant community impact area appears to substantially increase under the current proposal as compared to the original proposal (Alternative 2), this is because of greater area involved with slope re-manufacturing. What must be kept in mind, however, is that the regrading of the slopes to have lower slope angles will enhance the success of the revegetation effort. The original proposal (Alternative 2) would not have included as extensive modification of slopes but would have incorporated substantial retaining walls (which would not provide area for replanting); in essence, the vertical retaining wall area under Alternative 2 represents a larger overall hardscape footprint for the project that would be unavailable to support vegetation, as compared to the current proposal. In this regard, the current proposal, while producing a larger area of impact due to more extensive earthwork area, would have lower residual (permanent) impacts upon native plant communities and ESHA than the original proposal. Mitigation has been required for the impacts to native plant communities (ESHA) including a mandatory restoration plan within both the City of Carpinteria and County of Santa Barbara portions of the project. The final restoration plan will include performance standards and an appropriate combination of hydro seeding and container plants to support long-term revegetation of the re-manufactured slopes.

GR4: Alternatives

A substantial number of commenters expressed support for implementation of Alternative 4 instead of the Project. Due to this expression of interest by members of the public, Santa Barbara County requested each of the alternatives identified in the EIR include sufficient depth of analysis to support a potential approval based on any of the alternatives.

The No Project Alternative (Alternative 1) would not entail any approvals and would simply perpetuate all existing conditions within the trail alignment. No further analysis was deemed necessary to address this alternative. Alternative 2 was previously addressed in a certified mitigated negative declaration (MND); analysis from the MND was summarized in the Alternative 2 discussion in the EIR, as updated with findings from more recent geotechnical investigations. Hence the Alternative 2 analysis presented in the Draft EIR is considered to contain sufficient detail to satisfy CEQA; it must be recognized, however, that due to the need for extraordinary structural engineering and landslide stabilization components that could entail unique impacts to the environment, subsequent environmental review would likely be necessary to implement the trail based on the original alignment (Alternative 2).

The alignment for Alternative 3 is substantially the same as for the project, and the area of potential effect is also principally the same as for the project. Alternative 3 involves a slight shift in the trail alignment on the south side of the UPRR corridor, in order to intersect the historic rail bench at a more westward location to employ more of the existing bench for the trail, and the incorporation of a 6 percent trail surface slope for an approximately 690 foot section of the trail (compared to 5% for the proposed project). Identification of relative impacts of this design and

the applicability of prescribed mitigation measures are adequate under the Alternative 3 discussion of the EIR to support an approval based on this design, without the need for any bolstering of the existing discussion.

Alternative 4 includes a portion (east of the UPRR trail crossing) that is outside of the alignment that has been studied for the project. Notably the biological resources and potential cultural resources within this portion of Alternative 4 were not previously surveyed. Dudek conducted a biological survey of this portion of the trail unique to Alternative 4, and also re-evaluated the findings from the record search conducted for archaeological resources. The discussion under Alternative 4 has been updated accordingly, and now adequately identifies relative impacts of this design and the applicability of prescribed mitigation measures to support an approval based on this design, without the probable need for subsequent environmental review under CEQA (refer to Chapter 3, Alternatives).

Hello Nick – Does the Rincon Trail/EIR have impacts to utilities such as SoCalGas or water, sewer, telecom, electric/Edison, etc? Thanks, Tim.

From: Nick Bobroff <nickb@ci.carpinteria.ca.us>

Sent: Thursday, March 11, 2021 4:43 PM

To: Nick Bobroff <nickb@ci.carpinteria.ca.us>

Subject: [EXTERNAL] Public Release of the Draft Environmental Impact Report for the Carpinteria Rincon Trail Project

*** EXTERNAL EMAIL - Be cautious of attachments, web links, and requests for information ***

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Response to Comment Letter S1

Southern California Gas
Timothy Mahoney
March 18, 2021

S1-1 The commenters questions whether the EIR outlines impacts to utilities such as gas, water, sewer, telecommunications, electric.

The proposed project's impacts to utilities, such as gas, water, sewer, telecom, electric, have been analyzed in Section 3.14 of the Draft Environmental Impact Report (EIR). As discussed in this section, the project would not create additional demands in the areas of natural gas, electricity, or telecommunications facilities and therefore no impacts to these utilities would occur. In addition, impacts to water and wastewater would be less than significant.

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Hi Nick,

Thanks for our brief phone discussion today regarding the Project DEIR. Please ensure that UP received a copy of the report for any comment. You may forward it to Ms. Peggy Ygbuhay at pygbuhay@up.com.

S2-1

Sincerely,



Oliver Garcia, PE

Utilities Engineer

Rail Crossings & Engineering Branch - Rail Safety Division

California Public Utilities Commission

320 West 4th Street, Suite 500 | Los Angeles, CA 90013

☎ Cell (213) 369-4674

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Response to Comment Letter S2

California Public Utilities Commission
Oliver Garcia, PE
April 1, 2021

S2-1 The commenter requests that the City ensures that Union Pacific Railroad (UPRR or UP) received a copy of the EIR.

The City, UPRR, and the project engineer have been working together for the past year on an easement and encroachment agreement for the proposed bridge over-crossing of the UPRR corridor. City Public Works notified UPRR of the availability of the EIR and provided a link to download the document from the City's website. The UPRR project contact has also been added to the project notification list for all future meetings, document releases, etc.

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CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST DISTRICT OFFICE
89 SOUTH CALIFORNIA STREET, SUITE 2000
VENTURA, CA 93001
VOICE (805) 585-1800



April 26, 2021

Nick Bobroff, Principal Planner
Community Development Department
5775 Carpinteria Avenue
Carpinteria, CA 93013

RE: Draft Carpinteria Rincon Trail Project Environmental Impact Report

Dear Mr. Bobroff,

Commission staff has reviewed the Draft Carpinteria Rincon Trail Project Environmental Impact Report (DEIR) regarding the proposed realignment and redesign of the Carpinteria Rincon Trail located within the City of Carpinteria and Santa Barbara County, and we appreciate the opportunity to provide comments for your consideration.

S3-1

The originally circulated Mitigated Negative Declaration (MND) for the Rincon Trail, which was subsequently approved by the City through CDP No. 15-1760, included a 12 foot wide and 4,000 foot long shared-use trail, a 110 foot long clear-span bridge over the Union Pacific Rail Road (UPRR) alignment, 17 public parking spaces and a rest area with three picnic tables, signage, lighting and a storm drainage collection system including an on-site bioswale and a 5,000 gallon cistern to provide water for native landscaping during dry months. That project also included 30,000 cubic yards of cut, 7,000 cubic yards of fill and 23,000 cubic yards of export. In 2019 a Subsequent MND (SMND) was prepared, because the project was proposed to be modified to avoid areas with historic landslides, to eliminate the need for retaining walls, to shorten the path length, and to ensure accessibility of the trail for persons with disabilities pursuant to Americans with Disabilities Act (ADA) and Architectural Barriers Act requirements. The modified project included a 16 foot wide and approximately 2,800 foot long shared-use trail, a 160 foot long clear-span bridge over the UPRR alignment, and a storm drainage collection system including new drain outlets to the ocean. That project also included 104,000 cubic yards of cut, 10,300 cubic yards of fill and 94,100 cubic yards of export. The SMND was approved by the Carpinteria Planning Commission, but that decision was appealed to the City Council. Although the appeal of the Planning Commission's approval of the SMND was never heard by the City Council, the City Council decided to move forward with the preparation of a focused EIR.

S3-2

The subject DEIR is the product of the focused EIR effort and includes the analysis of four project alternatives: no project/no build (Alternative 1), maximize existing benchwork/topography alternative (Alternative 2), steeper slopes/reduced earthwork alternative (Alternative 3), and freeway adjacent trail avoiding bluff face alternative (Alternative 4). Alternative 3 is identified as the environmentally superior alternative and

S3-3

includes the same alignment and project features as the modified project from the SMND, but would result in 15,000 less cubic yards of earthwork. Despite the improvement in the amount of grading, the proposed project and selected alternative raise issues regarding grading and landform alteration, native vegetation communities, and public access. The entire project is located in the Coastal Zone, but spans both the jurisdiction of the City of Carpinteria (City) and County of Santa Barbara (County). Because the Commission has certified a LCP for both the City and County, the standard of review for the proposed project would be the respective LCP policies and provisions.

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S3-3
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Grading and Landform Alteration

The originally approved project included 30,000 cubic yards of cut, 7,000 cubic yards of fill, and 23,000 cubic yards of export while the modified realignment and redesign analyzed in the SMND included 104,000 cubic yards of cut, 10,300 cubic yards of fill and 94,100 cubic yards of export. Alternative 3 would result in a reduction of 15,000 cubic yards of grading compared to the project proposed in the SMND; however, this is still a 62,300 cubic yard increase in the total amount of grading compared to the original project. The City's LCP contains Coastal Act Section 30251, which requires that the scenic and visual qualities of coastal areas shall be considered and protected and that new development is sited and designed to minimize alteration of natural land forms and also subordinate to the character of its setting. The proposed project will result in a significant amount of grading and landform alteration at the subject site. While grading impacts were analyzed in the DEIR, it was determined that with the incorporation of mitigation measures the proposed project would not result in any significant impacts as a result of grading. However, in order to determine consistency with the certified LCP, additional siting and design alternatives to further minimize grading and landform alteration should be analyzed.

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S3-4
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ESHA

Coastal Act Section 30240, which is incorporated into the City's LCP, requires that Environmentally Sensitive Habitat Areas (ESHA) be protected to the maximum extent feasible. The draft DEIR includes an analysis of temporary and permanent impacts to various vegetation communities, including ESHA; however, it appears that the only permanent impacts identified are those impacts specific to the trail footprint and impacts as a result of vegetation removal are considered temporary. The Commission has historically considered temporary impacts to be those where: 1) there is not significant ground disturbance (i.e. earthwork including grading that disturbs seedbank); and 2) vegetation recovers to comparable size/age class within 12 months from the initial disturbance. All other impacts are considered permanent. The EIR should include more information on the expected temporary and permanent impacts consistent with the Commission's approach and as necessary revise Table 3.3-5 to reflect the totals of temporary and permanent impacts, and required mitigation.

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S3-5
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Public Access

The originally approved project included the construction of 17 public parking spaces and a rest area with picnic tables at the western terminus of the Rincon Trail, located along Carpinteria Avenue. However, the selected alternative does not include the

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S3-6
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construction of these public access amenities, and the DEIR indicates that instead, the existing dirt lot would continue to provide informal parking. However, based upon the information included within the DEIR, it is unclear which portions of the dirt areas along Carpinteria Avenue are intended to function as parking for the proposed trail, and if those areas are actually available for public use. In order to facilitate maximum public access to the Rincon Trail, and to ensure consistency with the public access policies of the LCP, the final EIR should analyze project alternatives that include construction of the previously approved, or similar, public access components.

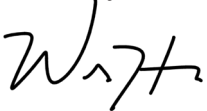
S3-6
Cont.

Each of the issues identified in this letter, as well as other impacts identified in the environmental review process, should be analyzed in the context of alternative project designs. As described above, an analysis of project alternatives is critical to ensure that adverse impacts to coastal resources are avoided to the maximum extent feasible, and that unavoidable impacts are minimized and mitigated. Please note that the comments provided herein are preliminary in nature. More specific comments may be appropriate as the project develops, and Coastal Commission staff requests notification of any future activity associated with this project or related projects. Again, thank you for the opportunity to comment.

S3-7

S3-8

Sincerely,



Wesley Horn
Coastal Planner, Southern California Caltrans Liaison
California Coastal Commission

cc: Tami Grove, Statewide Transportation Program Manager, CCC
Shannon Fiala, Coastal Program Manager
Jacqueline Phelps, South Central Coast Supervisor, CCC

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Response to Comment Letter S3

California Coastal Commission
Wesley Horn
April 26, 2021

- S3-1** The City acknowledges the comment as an introduction to comments that follow. No further response is required.
- S3-2** The commenter describes the project proposed under the 2015 Mitigated Negative Declaration (MND) and the 2019 Subsequent MND and provides background to the EIR. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR, and therefore, no further response is required.
- S3-3** The commenter describes the four alternatives outlined in the EIR as well as the jurisdictions within which the proposed project falls. The commenter states that the standard of review for the proposed project would be the respective local coastal program (LCP) policies and provisions. As described in Section 3.9.4, the proposed project would be consistent with the Carpinteria General Plan/Coastal Land Use Plan and Santa Barbara County Coastal Land Use Plan, that serve as the City's and County's Local Coastal Land Use Plan, which ensures that the local government's land use plans, zoning ordinances, zoning maps, and implementation actions meet the requirements, provisions and policies of the California Coastal Act. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR, and therefore, no further response is required.
- S3-4** The commenter expresses concern regarding the aesthetic effects of the grading and landform alternation associated with the proposed project and Alternative 3. The commenter suggests that, in order to comply with Coastal Act Section 30251, referenced in the City's LCP, additional siting and design alternatives to minimize grading and alternation should be analyzed.
- See Global Response GR2, Earthwork/Landform Modification. In short, the EIR authors do not believe that additional alternatives for the purpose of minimizing earthwork volumes would be warranted in order to meet the criteria for sufficiency of alternatives analysis under CEQA Section 15126.6(d). In addition, minor alterations to the project and to Alternative 3 were accomplished to reduce earthwork volumes, including the removal of a previously proposed mid-elevation bench for the trail segment south of the UPRR alignment (project and Alternative 3), a narrower path width for the portion of the trail south of the UPRR alignment (Alternative 3), and slightly steeper slope of 6 percent for a 690 foot portion of the trail segment south of the UPRR alignment (Alternative 3).
- S3-5** The commenter provides background information on Environmentally Sensitive Habitat Areas (ESHA), per Coastal Act Section 30240 and the City's LCP, and states that permanent impacts should expand beyond those specific to the trail footprint and include those that result from vegetation removal. In addition, the commenter requests that the EIR should include more information on the expected temporary and permanent impacts consistent with the Coastal Commission's approach and revise Table 3.3-5 to reflect the new totals of temporary and permanent impacts and required mitigation.

This comment has been addressed in replacement Section 3.3 Biological Resources, including Table 3.3-5 and associated text including required mitigation by reclassifying all project impacts upon

biological resources to permanent impacts. It was determined that the impacts previously defined as temporary were more permanent in nature when associated with impacts to vegetation communities. Furthermore, the mitigation ratio for impacts to S3 native vegetation communities was updated to 4:1 and the mitigation ratio for impacts to S4 and S5 native vegetation communities was updated to 2:1. These mitigation ratios apply to the associated vegetation communities and are not altered for on-site versus off-site mitigation involving native habitat restoration.

S3-6 The commenter expresses concern that the proposed project and alternatives do not include the construction of public access amenities previously included in other CEQA documentation, such as 17 parking spaces and a rest area with picnic tables, to be located at the western terminus of the proposed trail, along Carpinteria Avenue. The commenter is also unclear as to which portions of the dirt areas along Carpinteria Avenue would function as parking for the proposed trail, and if those areas are available for public use.

As discussed in Chapter 2 of the EIR, vehicle parking at the trailhead on the western end would be provided via an existing dirt lot adjacent to the Carpinteria Avenue terminus and available on-street parking in the area; no improvements to the existing informal dirt parking lot are proposed under the Carpinteria Rincon Trail project. However, as part of a separate, future project, the City of Carpinteria intends to provide parking spaces for visitors to the Rincon Bluffs Preserve property that is located immediately adjacent to the western end of the trail, which also would be available for recreationalists to access the trail at this point. It should also be noted that the proposed trail would close a gap in the existing regional bicycle path system, thus allowing access to the trail for pedestrians and cyclists without the need for vehicular use and reducing potential parking demands. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR, and therefore, no further response is required.

S3-7 The commenter suggests that all issues identified in this letter (see responses S3-1 through S3-6, above), should be analyzed for each proposed alternative, to ensure that adverse impacts to coastal resources are avoided to the maximum extent feasible, and that unavoidable impacts are minimized and mitigated.

Per CEQA Guidelines Section 15126.6(d), an EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (*County of Inyo v. City of Los Angeles* (1981) 124 Cal.App.3d 1). The analysis of the project did not identify any unavoidable significant impacts, which is the paramount consideration for the development of alternatives to the proposed action. However, given potentially significant impacts were identified, the EIR included four distinct alternatives to the project, each with an intent to lessen or avoid the significant impacts of the proposal. Information on each alternative, including involved grading quantities, has been provided in Section 6.0; the relative severity of each impact is also compared to the project, and the necessity under each alternative for implementation of mitigation measures identified for project impacts is identified. Therefore, per CEQA Guidelines Section

15126.6(d), a full analysis of each proposed alternative, including specific mitigation measures to address unique impacts of such an alternative, is not required.

S3-8

The commenter states that comments provided in this letter are preliminary and that more specific comments may be appropriate as the project develops. The commenter states that Coastal Commission staff requests notification of any future activity associated with the project or related projects.

The Coastal Commission will be notified of any future activity associated with the project. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR, and therefore, no further response is required.

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



April 28, 2021

Nick Bobroff
Principal Planner
City of Carpinteria
5775 Carpinteria Avenue
Carpinteria, CA 93013
NickB@ci.carpinteria.ca.us

Subject: Comments on the Draft Environmental Impact Report for the Carpinteria Rincon Multi-Use Trail, SCH #2020060534, Santa Barbara County

Dear Mr. Bobroff:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) for the Carpinteria Rincon Multi-Use Trail (Project). The City of Carpinteria (City) is the lead agency preparing a DEIR pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et. seq.) with the purpose of informing decision-makers and the public regarding potential environmental effects related to the Project.

S4-1

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

S4-2

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" (see Fish & Game Code, § 2050) of any species protected under the California Endangered Species Act (CESA; Fish & Game Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & Game Code, § 1900 et

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seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Location: The Project would extend from the eastern end of Carpinteria Avenue, in the City of Carpinteria, to Rincon Beach County Park, in unincorporated Santa Barbara County. The Carpinteria Bluffs Nature Preserve lies to the east of the Project and the Project is bordered by the Rincon Bluffs Preserve.

Project Description/Objectives: The proposed Project includes the construction of a paved 16-foot-wide trail (10-foot-wide path with 3-foot-wide paved shoulder along both sides); an approximately 2,800-feet-long clear-span bridge over the Union Pacific Railroad alignment; parking facilities; fencing; signage; and, a storm drainage collection system, with new drain outlets to the ocean. The bridge would be approximately 160-feet-long, with a width of between 14-feet and 16-feet.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Comment 1: Adequacy of CEQA-Evaluation for Rare Plants

Issue: The DIER states cliff malacothrix (*Malacothrix saxatilis* var. *saxatilis*), south coast branching phacelia (*Phacelia ramosissima* var. *austrolitoralis*), and woolly seablite (*Suaeda taxifolia*) plants will be impacted by the Project. The loss of locally rare species was not fully analyzed in the DEIR.

Specific impact: The removal of individuals of these three species will contribute to their local and overall decline.

Why impact would occur: The DEIR discloses the total number of individuals present but does not specify how many will be impacted by the project. The DEIR concluded impacts to these three species, with no mitigation proposed, would not be significant. The DEIR does not contain sufficient analysis to support this conclusion for the following rare plants:

- Cliff malacothrix is ranked 4.2 (fairly endangered in California), limited distribution by the California Native Plant Society (CNPS). There are only 18 recent (1980-present) observations of this plant documented in Santa Barbara County.
- South coast branching phacelia is ranked 3.2 (fairly endangered in California) by CNPS. This plant is known from only 39 records (1980-present) in Santa Barbara County.
- Woolly seablite is ranked 4.2 (fairly endangered in California) by CNPS. This plant is known from only 23 recent records (1980-present) in Santa Barbara County.

Many of the plants listed by the CNPS as California Rare Plant Rank 3 and 4 meet the definitions of the California Endangered Species Act of the California Fish and Game Code and are eligible for state listing. Many California Rare Plant Rank 3 and 4 plants are significant locally, and CDFW recommends that they be evaluated for impact significance during

↑ S4-2
Cont.

S4-3

S4-4

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preparation of environmental documents relating to CEQA, based on CEQA Guidelines §15125 (c) and/or §15380. Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, as they meet the definition of Rare or Endangered under CEQA Guidelines §15125 (c) and/or §15380 (CEQA-rare). To assist botanists in evaluating California Rare Plant Rank 3 and 4 species for CEQA consideration the California Native Plant Society (CNPS) has prepared a technical memorandum titled *Considerations for Including CRPR 4 Plant Taxa in CEQA Biological Resource Impact Analysis* (https://www.cnps.org/wp-content/uploads/2020/02/crpr4_technical_memo.pdf).

S4-4
Cont.

This Project contains rare vegetation alliances and *The Considerations for Including CRPR 4 Plant Taxa in CEQA Biological Resource Impact Analysis* indicates List 4 plants that are associated with rare vegetation alliances should be fully evaluated in CEQA.

Evidence impact would be significant: The DEIR analysis does not acknowledge the limited number of occurrences of these plant species in Santa Barbara County. Given the limited number of occurrences for these species, the DEIR should acknowledge the significance of these impacts. For example, this Project would impact one of 18 occurrences of Cliff malacothrix documented in the last 40 years in the county and provide no mitigation for this impact. CDFW asserts impacting one of 18 known recent occurrences should be considered significant without mitigation.

This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

The Project may result in impacts to CEQA-rare species without including any specific avoidance and minimization measures

S4-5

Given the current number of recent documented occurrences of each of these plants in Santa Barbara County, impacts to cliff malacothrix, south coast branching phacelia, and woolly seablite plants should be considered significant under CEQA unless they are clearly mitigated below a level of significance.

Inadequate avoidance, minimization, and mitigation measures for impacts to these CEQA-rare plant species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Recommendation #1: When analyzing the current range and extent of CNPS rank 3 and 4 plants, current status and trends for each species should be assessed in context to the local distribution and recent (last 20 years per the *Considerations for Including CRPR 4 Plant Taxa in CEQA Biological Resource Impact Analysis* recommendations) population status.

S4-6

Comment 2: Mitigation for Impacts to Rare Plants

Issue: Mitigation that would replace individuals or occupied land directly impacted by the Project was not proposed.

S4-7

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Specific impact: The removal of individuals of these three species will contribute to their local and overall decline.

Why Impact Would Occur: Project implementation includes grading, vegetation clearing, trail/road construction, soil compaction, utilities construction, road maintenance, and other activities that may result in direct mortality, population declines, or local extirpation of vegetation communities.

Evidence impact would be significant: The DEIR does not provide any specific requirements to replace the number of cliff malacothrix, south coast branching phacelia, and woolly seablite plants impacted. CEQA Guidelines, sections 15070 and §15071 require the document to analyze if the Project may have a significant effect on the environment as well as review if the Project will 'avoid the effect or mitigate to a point where clearly no significant effects would occur'. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

Mitigation Measure #1: CDFW recommends the DEIR include mitigation that addresses the loss of these individual plants as well as the land/habitat in which they grow. The specific habitat that supports rare plants, and the current density per acre of these plants, should be assessed when formulating mitigation strategies.

Mitigation Measure #2: Given the current status of these rare plants, CDFW recommends the Project be redesigned to avoid impacts to these rare plant species. If avoidance cannot be achieved, CDFW recommends conserving a currently unprotected occurrence of these plant species, including a conservation easement and funding to manage the species in perpetuity. CDFW recommends due to the limited number of recent occurrences of cliff malacothrix (18) and woolly seablite (23) in Santa Barbara county, that the number of individuals as well as the acreage of land that supports them (density) be conserved at a 3:1 ratio. Given South coast branching phacelia has a slightly higher number of occurrences (39) in Santa Barbara County, CDFW recommends that the number of individuals as well as the acreage of land that supports them (density) be conserved at a 1.5:1 ratio.

Recommendation #1: Any mitigation for CEQA-rare plant impacts should include specific, measurable criteria for success. Monitoring for CEQA-rare vegetation communities should occur for a sufficient period to allow trends to be analyzed and demonstrate the occurrence is stable over time. No negative trend in CEQA-rare plant individuals (counted separately as flowering, seed set and non-flowering individuals), and no positive trend in non-native plant cover should occur over the monitoring period.

Recommendation #2: When considering mitigation options, CDFW does not recommend topsoil salvage or transplantation as viable mitigation options. Several studies have documented topsoil salvage had no effect on the recolonization of the target plant species (Hinshaw, 1998, Dixon, 2018). Based on the scientific literature available, relying on topsoil salvage alone to mitigate impacts to CEQA-rare plant species does not appear to provide any value to mitigate impacts to the plant.

Transplantation is rarely successful in establishing rare plants at new locations. A study by CDFW (Fiedler, 1991) found that, even under optimum conditions with ample time for planning,

S4-7
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S4-8

S4-9

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transplantation was effective in only 15% of cases studied. Other reviews (e.g. Allen, 1994; Howald, 1996) have found similar problems digging up, transporting, and replanting plants, bulbs, rhizomes or seeds imposes a tremendous stress on a plant. They can easily die in the process. Scientifically-tested, reliable methods for salvage, propagation, translocation or transplantation are not available for many rare species. Transplantation can also cause problems at the target site. Genetic contamination can occur if the plant being transplanted can exchange genetic material with local taxa. Disturbance at the target site may facilitate invasion by non-native invasive species (CNPS, 1991).

Recommendation #3: CDFW recommends a Documented Conservation Seed Collection of the impacted rare plant species be made and deposited at either Santa Barbara Botanic Garden or the California Botanic Garden (formerly known as Rancho Santa Ana Botanic Garden). A Documented Conservation Seed Collection is when seed from CNPS ranked 1-4 plants, CEQA-rare, and/or CESA-listed plant species is collected and stored as part of a permanent genetic collection in a protected location. This collection preserves the genome, and any unique alleles that are present in any given occurrence, for future study and reintroduction projects.

Funding should be provided to maintain the collection, as well as conduct periodic germination and viability tests, in perpetuity. Documented conservation collections (long-term storage) are important for conserving rare, gene pool representative germplasm designated for long-term storage to provide protection against extinction and as a source material for future restoration and recovery.

Recommendation #4: A weed management plan should be developed for the Project area and implemented during the duration of this Project. On-going soil disturbance promotes establishment and growth of non-native weeds. As part of the Project, non-native weeds should be prevented from becoming established. The Project area should be monitored via mapping for new introductions and expansions of non-native weeds.

Comment 3: Mitigation for Sensitive Vegetation Communities

Issue: The DEIR states approximately 3.55 acres of CDFW/county/city sensitive vegetation community habitats would be temporarily impacted due to construction and an additional 0.76-acres CDFW/county/city habitats would be permanently impacted due to construction. The DEIR states the temporary impacts would be mitigated at a 1:1 ratio and permanent impact at a 3:1 ratio. The DEIR states a future plan will be prepared to further address this mitigation.

Sensitive vegetation communities are defined by their dominant plant species, such as California Brittle Bush –Ashy Buckwheat Scrub Alliance and have a separate ranking system than that of individual rare plants, which are covered in Comment 1, above.

CDFW is concerned the 1:1 ratio for “temporary impacts” may not be adequate.

Specific Impact: CEQA Guidelines sections 15070 and 15071 require the DEIR to analyze if the Project may have a significant effect on the environment as well as review if the Project will “avoid the effect or mitigate to a point where clearly no significant effects would occur.”

The DEIR states the 1:1 mitigation may occur on “other properties” due to the lack of available area on the Project site for mitigation. Due to the rare nature of these vegetation communities, and the land which supports them, CDFW is concerned about the deferral of mitigation to other,

S4-9
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S4-10

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S4-12

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unidentified properties that may or may not be suitable or even available for appropriate mitigation. Given that most coastal bluff habitat is rare in nature, it is unclear if rare habitats at other properties will be impacted to provide mitigation for this Project.

S4-12
Cont.

The DEIR does not indicate if the rare plants mentioned in Comment 1 above, will be impacted by trying to fit all the required sensitive vegetation community mitigation on non-impacted parts of the Project site. The DEIR should disclose if any sensitive vegetation community mitigation will occur within or around areas occupied by cliff malacothrix, south coast branching phacelia, and woolly seablite plants.

In order to analyze if a project may have a significant effect on the environment, the location, species composition, and success criteria of proposed mitigation information is necessary to allow the Department to comment on alternatives to avoid impacts, as well as assess the adequacy of the mitigation proposed.

S4-13

Why Impact Would Occur: Project implementation includes grading, vegetation clearing, trail/road construction, soil compaction, utilities construction, road maintenance, and other activities that may result in direct mortality, population declines, or local extirpation of vegetation communities.

Evidence Impact would be significant: Removing a perennial plant from the ground is a permanent impact resulting in its death, replacing it is considered mitigation. All impacts that remove perennial plants from the ground should be considered under the same lens whether the restoration occurs in the same area as the impacts or in new areas. Both scenarios may or may not produce successful new individuals or the targeted vegetation community assemblage. Both scenarios result in: 1) the loss of established individuals; and, 2) the replacement planting of new individuals. Both scenarios incur temporal losses as well as intensive management to ensure the desired habitat is re-created. Both are at risk for failure and are a community of same-aged individuals lacking the age stratification and complexity of the original habitat.

S4-14

Inadequate avoidance, minimization, and mitigation measures for impacts to these CEQA-rare vegetation communities will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Mitigation Measure #1: CDFW recommends avoiding any sensitive natural communities found on the Project. If avoidance is not feasible, the Project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. CDFW recommends all impacts to the S3 sensitive vegetation communities (California Brittle Bush –Ashy Buckwheat Scrub Alliance, Encelia californica Association and Lemonade Berry Scrub Alliance, Rhus integrifolia Association) (0.59-acres) should be mitigated at a 4:1 ratio and impacts to the S4 and S5 communities (3.73-acres) be mitigated at a 2:1 ratio due to the overall decline of coastal bluff/scrub habitats region wide.

S4-15

All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan, to be approved by CDFW prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and a funding mechanism for long-term management. Areas proposed as mitigation should have a

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recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).

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Mitigation Measure #2: Success criteria should be based on the specific composition of the vegetation communities being impacted. Success should not be determined until the site has been irrigation-free for at least 5 years and the metrics for success have remained stable (no negative trend for richness/diversity/abundance/cover and no positive trend for invasive/non-native cover for each vegetation layer) for at least 5 years. In the revegetation plan, the success criteria should be compared against an appropriate reference site, with the same vegetation alliance, with as good or better-quality habitat. The success criteria shall include percent cover (both basal and vegetative), species diversity, density, abundance, and any other measures of success deemed appropriate by CDFW. Success criteria shall be separated into vegetative layers (tree, shrub, grass, and forb) for each alliance being mitigated, and each layer shall be compared to the success criteria of the reference site, as well as the alliance criteria in MCV2, ensuring one species or layer does not disproportionately dominate a site but conditions mimic the reference site and meets the alliance membership requirements.

S4-17

CDFW does not recommend topsoil salvage or transplantation as viable mitigation options. Several studies have documented topsoil salvage had no effect on the recolonization of the target plant species (Hinshaw, 1998, Dixon, 2018). Based on the scientific literature available, relying on topsoil salvage alone to mitigate impacts to CEQA-rare plant species does not appear to provide any value to mitigate impacts to the plant.

S4-18

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife resources, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (California Code of Regulations, tit. 14, § 753.5; Fish and Game Code, § 711.4; Public Resources Code, § 21089).

S4-19

Conclusion

CDFW appreciates the opportunity to comment on the DEIR to assist the City of Carpinteria in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Kelly Schmoker, Senior Environmental Scientist, at (626) 335-9092 or by email at Kelly.Schmoker@wildlife.ca.gov.

S4-20

Sincerely,

DocuSigned by:

Erinn Wilson-Olgin

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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

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cc: CDFW

Steve Gibson, Los Alamitos – Steve.Gibson@wildlife.ca.gov
Sarah Rains, Los Alamitos – Sarah.Rains@wildlife.ca.gov
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State Clearinghouse, Sacramento – CEQACommentLetters@wildlife.ca.gov
CNPS Channel Islands Chapter – Kipp.Callahan@gmail.com

References

Allen, W. H. 1994. Reintroduction of endangered plants: biologists worry that mitigation may be considered an easy option in the political and legal frameworks of conservation. *Bioscience* 44(2): 65-8.

California Native Plant Society Rare Plant Scientific Advisory Committee. 1991. *Mitigation Guidelines Regarding Impacts to Rare, Threatened and Endangered Plants*. California Native Plant Society, Sacramento, CA.

Dixon, P. 2018. Assessment of Topsoil Salvage and Seed Augmentation in the Restoration of Coastal Sage Scrub on Santa Catalina Island, California. *Western North American Naturalist*, 78(4), 711-721.

Fiedler, P. 1991. Mitigation related transplantation, translocation and reintroduction projects involving endangered and threatened and rare plant species in California. California Department of Fish and Game, Sacramento, CA. 82 pp.

Hinshaw, J., Holmstead, G., Cypher, B., & Anderson, D. (1998). Effects of simulated oil field disturbance and topsoil salvage on *Eriastrum hooveri* (Polemoniaceae). *Madroño*, 45(4), 290-294. Retrieved May 19, 2020, from www.jstor.org/stable/41425279

Howald, A.M. Translocation as a mitigation strategy: lessons from California. In: D.A. Falk, C.I. Millar, and M. Olwell eds. *Restoring Diversity: Strategies for Reintroduction of Endangered Plants*. Island Press, Washington, DC.

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CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
REC-Bio-1-CEQA-Rare Plants	When analyzing the current range and extent of CNPS rank 3 and 4 plants, current status and trends for each species should be assessed in context to the local distribution and recent (last 20 years per the Considerations for Including CRPR 4 Plant Taxa in CEQA Biological Resource <i>Impact Analysis</i> recommendations) population status.	Prior to Finalizing the EIR	City of Carpinteria
MM-Bio-1-CEQA-Rare Plants	CDFW recommends the DEIR include mitigation that addresses the loss of these individual plants as well as the land/habitat in which they grow. The specific habitat that supports rare plants, and the current density per acre of these plants, should be assessed when formulating mitigation strategies.	Prior to Finalizing the EIR	City of Carpinteria
MM-Bio-2-CEQA-Rare Plants	Given the current status of these rare plants, CDFW recommends the Project be redesigned to avoid impacts to these rare plant species. If avoidance cannot be achieved, CDFW recommends conserving a currently unprotected occurrence of these plant species, including a conservation easement and funding to manage the species in perpetuity. CDFW recommends due to the limited number of recent occurrences of cliff malacanthix (18) and woolly seablite (23) in Santa Barbara county, that the number of individuals as well as the acreage of land that supports them (density) be conserved at a 3:1 ratio. Given South coast branching phacelia has a slightly higher number of occurrences (39) in Santa Barbara County, CDFW recommends that the number of individuals as well as the acreage of land that supports them (density) be conserved at a 1.5:1 ratio.	Prior to Finalizing the EIR	City of Carpinteria
MM-Bio-3-CEQA-Rare Plants	Any mitigation for CEQA-rare plant impacts should include specific, measurable criteria for success. Monitoring for CEQA-rare vegetation communities should occur for a sufficient period to allow trends to be analyzed and demonstrate the occurrence is stable over time. No negative trend in CEQA-rare plant individuals (counted separately as flowering, seed set and non-flowering individuals), and no positive trend in non-native plant cover should occur over the monitoring period.	Prior to Finalizing the EIR	City of Carpinteria
REC-Bio-2-CEQA-Rare Plants	Any mitigation for CEQA-rare plant impacts should include specific, measurable criteria for success. Monitoring for CEQA-rare vegetation communities should occur for a sufficient period to allow trends to be analyzed and demonstrate the occurrence is stable over time. No negative trend in CEQA-rare plant individuals (counted separately as	Prior to Finalizing the EIR	City of Carpinteria

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	flowering, seed set and non-flowering individuals), and no positive trend in non-native plant cover should occur over the monitoring period.		
REC-Bio-3-CEQA-Rare Plants	<p>When considering mitigation options, CDFW does not recommend topsoil salvage or transplantation as viable mitigation options. Several studies have documented topsoil salvage had no effect on the recolonization of the target plant species (Hinshaw, 1998, Dixon, 2018). Based on the scientific literature available, relying on topsoil salvage alone to mitigate impacts to CEQA-rare plant species does not appear to provide any value to mitigate impacts to the plant.</p> <p>Transplantation is rarely successful in establishing rare plants at new locations. A study by CDFW (Fiedler, 1991) found that, even under optimum conditions with ample time for planning, transplantation was effective in only 15% of cases studied. Other reviews (e.g. Allen, 1994; Howald, 1996) have found similar problems digging up, transporting, and replanting plants, bulbs, rhizomes or seeds imposes a tremendous stress on a plant. They can easily die in the process. Scientifically-tested, reliable methods for salvage, propagation, translocation or transplantation are not available for many rare species. Transplantation can also cause problems at the target site. Genetic contamination can occur if the plant being transplanted can exchange genetic material with local taxa. Disturbance at the target site may facilitate invasion by non-native invasive species (CNPS, 1991).</p>	Prior to Finalizing the EIR	City of Carpinteria
REC-Bio-4-CEQA-Rare Plants	<p>CDFW recommends a Documented Conservation Seed Collection of the impacted rare plant species be made and deposited at either Santa Barbara Botanic Garden or the California Botanic Garden (formerly known as Rancho Santa Ana Botanic Garden). A Documented Conservation Seed Collection is when seed from CNPS ranked 1-4 plants, CEQA-rare, and/or CESA-listed plant species is collected and stored as part of a permanent genetic collection in a protected location. This collection preserves the genome, and any unique alleles that are present in any given occurrence, for future study and reintroduction projects.</p> <p>Funding should be provided to maintain the collection, as well as conduct periodic germination and viability tests, in perpetuity. Documented conservation collections (long-term storage) are important for conserving rare, gene pool representative germplasm designated for long-term storage to provide protection against extinction and as a source material for future restoration and recovery.</p>	Prior to Finalizing the EIR	City of Carpinteria
REC-Bio-5-CEQA-Rare Plants	A weed management plan should be developed for the Project area and implemented during the duration of this Project. On-going soil disturbance promotes establishment	Prior to Finalizing the EIR	City of Carpinteria

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	and growth of non-native weeds. As part of the Project, non-native weeds should be prevented from becoming established. The Project area should be monitored via mapping for new introductions and expansions of non-native weeds.		
MM-Bio-4-CEQA- Rare Plants Sensitive Vegetation Communities	CDFW recommends avoiding any sensitive natural communities found on the Project. If avoidance is not feasible, the Project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. CDFW recommends all impacts to the 5 sensitive vegetation communities (4.32-acres) should be mitigated at a 3:1 ratio due to the overall decline of coastal bluff/scrub habitats region wide. All revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan, to be approved by CDFW prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and a funding mechanism for long-term management. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§ 65965-65968).	Prior to Finalizing the EIR	City of Carpinteria
MM-Bio-5-CEQA Sensitive Vegetation Communities	Success criteria should be based on the composition of the vegetation communities being impacted. Success should not be determined until the site has been irrigation-free for at least 5 years and the metrics for success have remained stable (no negative trend for richness/diversity/abundance/cover and no positive trend for invasive/non-native cover for each vegetation layer) for at least 5 years. In the revegetation plan, the success criteria should be compared against an appropriate reference site, with the same vegetation alliance, with as good or better-quality habitat. The success criteria shall include percent cover (both basal and vegetative), species diversity, density, abundance, and any other measures of success deemed appropriate by CDFW. Success criteria shall be separated into vegetative layers (tree, shrub, grass, and forb) for each alliance being mitigated, and each layer shall be compared to the success criteria of the reference site, as well as the alliance criteria in MCV2, ensuring one species or layer does not disproportionately dominate a site but conditions mimic the reference site and meets the alliance membership requirements. CDFW does not recommend topsoil salvage or transplantation as viable mitigation options. Several studies	Prior to Finalizing the EIR	City of Carpinteria
	have documented topsoil salvage had no effect on the recolonization of the target plant species (Hinshaw, 1998, Dixon, 2018). Based on the scientific literature available, relying on topsoil salvage alone to mitigate impacts to CEQA		

Response to Comment Letter S4

California Department of Fish and Wildlife
Erinn Wilson-Olgin
April 28, 2021

S4-1 The commenter provides an introduction, background information, and gives thanks for the opportunity to comment; however, the comment does not pertain to the adequacy of the EIR.

No response needed.

S4-2 The commenter identifies themselves, their jurisdiction, and divulges their responsibility by law to provide, as available, biological expertise during public agency environmental review efforts. The commenter describes that they are also submitting comments as a Responsible Agency under CEQA. The commenter describes that they have regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority, and recommends the City obtain appropriate authorization under the Fish and Game Code. Additionally, if the project may result in “take” of species protected under the California Endangered Species Act or the Native Plant Protection Act, the commenter again recommends the City obtain appropriate authorization under the Fish and Game Code. The comments do not pertain to the adequacy of the EIR.

No response needed.

S4-3 The commenter acknowledges the project location and project description/objectives. The commenter explains that their comments and recommendations are offered to assist the City in identifying the project’s impacts and mitigation on fish and wildlife (biological) resources. The comments do not pertain to the adequacy of the EIR.

No response needed.

S4-4 The commenter raises the issue of adequacy of the CEQA evaluation for rare plants which lacks the number of individuals that would be impacted and falls short of a sufficient analysis on the significance of the impacts on each species. The commenter recommends that evaluating California Native Plant Society (CNPS) plants listed as California Rare Plant Rank (CRPR) 3 and 4 be evaluated for impact significance during preparation of the CEQA EIR. The commenter includes the CEQA Guidelines, §15125 (c) and/or §15380, for which the rare plants should be evaluated. The three plant species: cliff malacothrix (*Malacothrix saxatilis* var. *saxatilis*; CNPS CRPR 4.2), south coast branching phacelia (*Phacelia ramosissima* var. *austrolitoralis*; CNPS CRPR 3.2), and woolly seablite (*Suaeda taxifolia*; CNPS CRPR 4.2) are not considered locally rare in Santa Barbara County as they are not included on the Rare Plants of Santa Barbara County list (Wilken 2018); however they are considered locally rare in Ventura County as they are included on the Checklist of Ventura County Rare Plants (Magney 2020).

Section 3.3 Biological Resources has been updated to include a resource impact analysis for each of these plant species, notwithstanding that the entire project is located within Santa Barbara County. Research was conducted to define CEQA Guidelines §15125 (c) and/or §15380 as included below.

CEQA Guidelines §15125 Environmental Setting (c) states:

Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed, and it must permit the significant effects of the project to be considered in the full environmental context.

CEQA Guidelines §15380 Endangered, Rare, or Threatened Species states:

- (a) *"Species" as used in this section means a species or subspecies of animal or plant or a variety of plant.*
- (b) *A species of animal or plant is:*
 - (1) *"Endangered" when its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors; or*
 - (2) *"Rare" when either:*
 - (A) *Although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or*
 - (B) *The species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered "threatened" as that term is used in the Federal Endangered Species Act.*
- (c) *A species of animal or plant shall be presumed to be endangered, rare, or threatened, as it is listed in:*
 - (1) *Sections 670.2 or 670.5, Title 14, California Code of Regulations; or*
 - (2) *Title 50, Code of Federal Regulations Section 17.11 or 17.12 pursuant to the Federal Endangered Species Act as rare, threatened, or endangered.*
- (d) *A species not included in any listing identified in subdivision (c) shall nevertheless be considered to be endangered, rare or threatened, if the species can be shown to meet the criteria in subdivision (b).*
- (e) *This definition shall not include any species of the Class Insecta which is a pest whose protection under the provisions of CEQA would present an overwhelming and overriding risk to man as determined by:*
 - (1) *The Director of Food and Agriculture with regard to economic pests; or*
 - (2) *The Director of Health Services with regard to health risks.*

Neither Section 670.2, Title 14 California Code of Regulations nor Section 670.5, Title 14 California Code of Regulations include cliff malacothrix, south coast branching phacelia, or woolly seablite.

Neither Section 17.11, Title 50 Code of Federal Regulations nor Section 17.12 Code of Federal Regulations include cliff malacothrix, south coast branching phacelia, or woolly seablite.

This comment has been addressed in Section 3.3 Biological Resources including an updated evaluation for impact significance for each California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) 3 and 4 plant species based on the number of documented occurrences in Santa Barbara County and Ventura County, the type locality, occurrences at the periphery of a species' range, areas where the taxon is especially uncommon, areas where the taxon has sustained heavy losses (declining), occurrences exhibiting unusual morphology or occurring on unusual substrates, species maintained on Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S. Forest Service sensitive species lists, and taxa associated with a habitat that is declining in California at a significant rate.

S4-5 The commenter raises the issue that the DEIR does not acknowledge the limited number of occurrences of the CNPS CRPR 3 and 4 species in Santa Barbara County and that this information is needed to assess the significance of the specific impact relative to each species.

This comment has been addressed in Section 3.3 Biological Resources including an updated evaluation for impact significance for each CNPS CRPR 3 and 4 plant species based on the number of documented occurrences in Santa Barbara County, the type locality, occurrences at the periphery of a species' range, areas where the taxon is especially uncommon, areas where the taxon has sustained heavy losses (declining), occurrences exhibiting unusual morphology or occurring on unusual substrates, species maintained on Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S. Forest Service sensitive species lists, and taxa associated with a habitat that is declining in California at a significant rate.

S4-6 The commenter recommends that when analyzing the current range and extent of CNPS CRPR 3 and 4 plants, current status and trends for each species should be assessed in context with the local distribution and population status in the last 20 years.

This comment has been addressed in Section 3.3 Biological Resources including an updated evaluation for impact significance for each CNPS CRPR 3 and 4 plant species based on the number of documented occurrences in Santa Barbara County, the type locality, occurrences at the periphery of a species' range, areas where the taxon is especially uncommon, areas where the taxon has sustained heavy losses (declining), occurrences exhibiting unusual morphology or occurring on unusual substrates, species maintained on Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S. Forest Service sensitive species lists, and taxa associated with a habitat that is declining in California at a significant rate.

S4-7 The commenter raises the issue that the DEIR does not provide any specific requirements to replace the number of cliff malacothrix, woolly seablite, and south coast branching phacelia individuals impacted.

This comment has been addressed in Section 3.3 Biological Resources including an updated evaluation for impact significance for each CNPS CRPR 3 and 4 plant species based on the number of

documented occurrences in Santa Barbara County, the type locality, occurrences at the periphery of a species' range, areas where the taxon is especially uncommon, areas where the taxon has sustained heavy losses (declining), occurrences exhibiting unusual morphology or occurring on unusual substrates, species maintained on Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S. Forest Service sensitive species lists, and taxa associated with a habitat that is declining in California at a significant rate. Since the evaluation for impact significance for each CNPS CRPR 3 and 4 plant species concluded that impacts would be less than significant, no mitigation is required for CNPS CRPR 3 and 4 plant species.

- S4-8** The commenter recommends the DEIR include mitigation that addresses the loss of CNPS CRPR 3 and 4 plant species as well as the land/habitat in which they grow.

This comment has been addressed in Section 3.3 Biological Resources including an updated evaluation for impact significance for each CNPS CRPR 3 and 4 plant species based on the number of documented occurrences in Santa Barbara County, the type locality, occurrences at the periphery of a species' range, areas where the taxon is especially uncommon, areas where the taxon has sustained heavy losses (declining), occurrences exhibiting unusual morphology or occurring on unusual substrates, species maintained on Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S. Forest Service sensitive species lists, and taxa associated with a habitat that is declining in California at a significant rate. Since the evaluation for impact significance for each CNPS CRPR 3 and 4 plant species concluded that impacts would be less than significant, no mitigation is required for CNPS CRPR 3 and 4 plant species. Mitigation is included for native coastal bluff scrub and coastal scrub vegetation communities.

- S4-9** The commenter recommends the project be redesigned to avoid impacts to CNPS CRPR 3 and 4 plant species. If avoidance cannot be achieved, the commenter recommends conserving a currently unprotected occurrence of these plant species, including a conservation easement and funding to manage the species in perpetuity.

This comment has been addressed in Section 3.3 Biological Resources including an updated evaluation for impact significance for each CNPS CRPR 3 and 4 plant species based on the number of documented occurrences in Santa Barbara County, the type locality, occurrences at the periphery of a species' range, areas where the taxon is especially uncommon, areas where the taxon has sustained heavy losses (declining), occurrences exhibiting unusual morphology or occurring on unusual substrates, species maintained on Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S. Forest Service sensitive species lists, and taxa associated with a habitat that is declining in California at a significant rate. Since the evaluation for impact significance for each CNPS CRPR 3 and 4 plant species concluded that impacts would be less than significant, no mitigation is required for CNPS CRPR 3 and 4 plant species.

- S4-10** The commenter recommends a weed management plan should be developed for the project area and implemented during the duration of the project.

Section 3.3 Biological Resources includes MM-BIO-4, a Habitat Mitigation and Monitoring Plan that includes a detailed maintenance plan to include removal of invasive non-native species within areas with native plant restoration. Since the project includes impacts to areas not included in the Habitat

Mitigation and Monitoring Plan, a new mitigation measure MM-BIO-6 Weed Management Plan was added to Section 3.3 Biological Resources to address invasive weed establishment and spread.

S4-11 The commenter raises concern that the 1:1 ratio for “temporary impacts” may not be adequate.

This comment has been addressed in Section 3.3 Biological Resources including Table 3.3-5 and associated text including required mitigation by updating all impacts to permanent impacts. It was determined that the impacts previously defined as temporary were more permanent in nature when associated with impacts to vegetation communities; therefore, all project impacts were updated to be permanent impacts. Furthermore, mitigation ratios for impacts to S3 native vegetation communities was updated to 4:1 and mitigation ratios for impacts to S4 and S5 native vegetation communities were updated to 2:1. These mitigation ratios apply to the associated vegetation communities and are not altered for on-site versus off-site mitigation native habitat restoration.

S4-12 The commenter raises a concern regarding the potential future need for mitigation outside of the project boundaries, and the lack of specific identification of other non-project properties that may or may not be suitable or even available for appropriate mitigation. Additionally, the commenter raised concerns that the previously mentioned CNPS CRPR 3 and 4 plant species may be impacted by establishing habitat restoration mitigation on non-impacted parts of the project site.

This comment has been addressed in Section 3.3 Biological Resources within MM-BIO-5 Habitat Mitigation and Monitoring Plan. Text has been updated to state that prior to identifying habitat restoration mitigation areas, both within the project area and adjacent lands, the habitat shall be surveyed for sensitive vegetation communities and special-status plant species, to ensure avoidance of impacts during habitat restoration implementation. Additionally, potential adjacent mitigation lands shall be assessed to ensure sites are suitable and appropriate for implementation of habitat restoration for the impacted native vegetation communities.

S4-13 The commenter states that to analyze if a project may have a significant effect on the environment, the location, species composition, and success criteria of proposed mitigation information is necessary to allow the commenter to comment on alternatives to avoid impacts, as well as assess the adequacy of mitigation proposed.

This comment has been addressed in Section 3.3 Biological Resources within MM-BIO-5 Habitat Mitigation and Monitoring Plan. The text has been updated to state that prior to grading, the project related native coastal bluff scrub and coastal scrub vegetation communities shall be assessed by vegetation community type for species composition, associated plant cover, and dominant plant species. This project site native vegetation community data shall be used to define performance standards for native habitat restoration by vegetation community type and for non-native plant species.

S4-14 The commenter states that removing a perennial plant from the ground is a permanent impact resulting in its death, replacing it is considered mitigation. All impacts that remove perennial plants from the ground should be considered under the same lens whether the restoration occurs in the same area as the impacts or in a new area.

This comment has been addressed in Section 3.3 Biological Resources including Table 3.3-5 and associated text including required mitigation by updating all impacts to permanent impacts. It was

determined that the impacts previously defined as temporary were more permanent in nature when associated with impacts to vegetation communities; therefore, all project impacts were updated to be permanent impacts. Furthermore, the mitigation ratio for impacts to S3 native vegetation communities was updated to 4:1 and the mitigation ratio for impacts to S4 and S5 native vegetation communities was updated to 2:1. These mitigation ratios apply to the associated vegetation communities and are not altered for on-site versus off-site mitigation native habitat restoration.

- S4-15** The commenter recommends avoiding any sensitive natural communities found on the project. If avoidance is not feasible, the project proponent should mitigate at a ratio sufficient to achieve a no-net loss for impacts to special status plant species and their associated habitat. The commenter recommends all impacts to the S3 sensitive vegetation communities (California Brittle Bush – Ashy Buckwheat Scrub Alliance, *Encelia californica* Association and Lemonade Berry Scrub Alliance, *Rhus integrifolia* Association) should be mitigated at a 4:1 ratio and impacts to the S4 and S5 communities be mitigated at a 2:1 ratio due to the overall decline of coastal bluff/scrub habitat region wide.

This comment has been addressed in Section 3.3 Biological Resources including Table 3.3-5 and associated text including required mitigation by updating all impacts to permanent impacts. It was determined that the impacts previously defined as temporary were more permanent in nature when associated with impacts to vegetation communities; therefore, all project impacts were updated to be permanent impacts. Furthermore, mitigation ratios for impacts to S3 native vegetation communities were updated to 4:1 and mitigation ratios for impacts to S4 and S5 native vegetation communities were updated to 2:1. These mitigation ratios apply to the associated vegetation communities and are not altered for on-site versus off-site mitigation native habitat restoration.

- S4-16** The commenter states that all revegetation/restoration areas that will serve as mitigation should include preparation of a restoration plan, to be approved by CDFW prior to any ground disturbance. The commenter recommends that the restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and a funding mechanism for long-term management. The commenter recommends that the areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, § 65965-65968).

This comment has been addressed in Section 3.3 Biological Resources MM-BIO-5 Habitat Mitigation and Monitoring Plan as this is a restoration plan. The text has been updated to state that the Habitat Mitigation and Monitoring Plan shall be approved by CDFW prior to any ground disturbance. The Habitat Mitigation and Monitoring Plan includes requirements for restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals.

- S4-17** The commenter recommends that the success criteria should be based on the specific composition of the vegetation communities being impacted. The commenter recommends that the success should not be determined until the site has been irrigation-free for at least 5 years and the metrics for success have remained stable (no negative trend for richness/diversity/abundance/cover and no positive trend for invasive/non-native cover for each vegetation layer) for at least 5 years. The commenter recommends that in the revegetation plan, the success criteria should be compared against an appropriate reference site, with the same vegetation alliance, with as good or better-quality habitat.

The commenter recommends that the success criteria shall include percent cover (both basal and vegetative), species diversity, density, abundance, and any other measures of success deemed appropriate by the commenter, CDFW. The commenter recommends that success criteria shall be separated into vegetative layers (tree, shrub, grass, and forb) for each alliance being mitigated, and each layer shall be compared to the success criteria of the reference site, as well as the alliance criteria in MCV2, ensuring one species or layer does not disproportionately dominate a site but conditions mimic the reference site and meet the alliance membership requirements.

This comment has been addressed in Section 3.3 Biological Resources MM-BIO-5 Habitat Mitigation and Monitoring Plan. The text has been updated to state that the success criteria shall include percent cover (both basal and vegetative), species diversity, density, and abundance. This project site native vegetation community data shall be used to define performance standards for native habitat restoration by vegetation layers (tree, shrub, grass, and forb) for each vegetation community type and for non-native plant species. The text remains that the restoration areas shall be irrigation free for at least 3 years and the performance standards have remained stable (no negative trend for richness/ diversity/ abundance/ cover of native species and no positive trend for invasive/non-native cover for each vegetation layer) for at least 3 years.

S4-18 The commenter states that they, CDFW, do not recommend topsoil salvage or transplantation as viable mitigation options.

Comment noted. Proposed mitigation does not include topsoil salvage or transplantation.

S4-19 The commenter states that the project, as proposed, would have an impact on fish and/or wildlife resources, and assessment of filing fees is necessary. The fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by the commenter, CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (California Code of Regulations, tit. 14, § 753.5; Fish and Game Code, § 711.4; Public Resources Code, § 21089).

Comment noted. No response necessary.

S4-20 The commenter states that they, CDFW, appreciate the opportunity to comment on the DEIR to assist the City of Carpinteria in identifying and mitigating project impacts on biological resources.

Comment noted. No response necessary.

Hello Nick,

NCTC supports the local tribal governments recommendations, thank you.

Fred Collins
NCTC

T1-1

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Response to Comment Letter T1

Northern Chumash Tribal Council
Fred Collins
April 1, 2021

T1-1 The commenter indicates that the Northern Chumash Tribal Council supports the recommendations identified by local tribal governments.

The City acknowledges receipt of the comment. However, the comment does not address the adequacy or completeness of analysis provided in the EIR. Therefore no response is necessary.

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Friends of Bates Beach

A Non-Profit California Corporation
1072 Casitas Pass Road Suite 427 Carpinteria CA 93013
Email: friends@friendsofbatesbeach.org
Website: www.friendsofbatesbeach.org

April 26, 2021

Mr. Nick Bobroff, Principal Planner
Community Development Department
City of Carpinteria
5775 Carpinteria Avenue
Carpinteria, CA 93013

Re: Rincon Trail Environmental Impact Report

Dear Mr. Bobroff:

I watched the online public hearing of April 13, 2021 concerning the recently published Environmental Impact Report (March 2021) for the proposed Rincon Trail to be built just south of Carpinteria. I have a few questions and concerns I would like to bring to the Planning Committee's attention.

O1-1

1. Draining onto the Beach

These references are Slide 9 of the presentation and section 2.7.3 and 3.8.1 of the EIR Report

While the report concludes the five drainage pipes will adequately remove any storm water from the proposed trail, the report is silent about the effect of the water on the beach below. The conversation about an hour into the hearing did not consider you may be creating stream gullies across the sand to the water from the end of the pipes. We believe there is a significant possibility for the Bates Beach (northern) section to be split into several partitions over time from erosion cause by this water runoff, thus harming the enjoyment of that area by future beachgoers. While we concede that in the years when we experience heavier winter storms, sand does rebuild the beach's sand there, we are concerned there is no discussion about how the long-term "gullification" of the beach cannot be mitigated by this winter sand. We don't want to lose our future beach use for the convenience of the drainage from above.

O1-2

2. Removal of Concrete Brik-Brak

Also, in previous proposal versions, the concrete "brik-brak" near drain #5 was slated to be removed as a safety hazard since it is the result of a landslide from above several years ago (see photo, left). It butts up against the retaining wall and eventually we feel it will break through that wall due to further erosion onto the beach. I see no mention of this in the report and the testimony of Mr. Roberts at the hearing indicates this safety hazard is going to be left in place. We think this is a mistake and we ask that it be removed since all the heavy equipment necessary to do so will be right there anyway during the trail construction.



O1-3

3. Parking Lot ADA Non-Compliance

There is no mention in the EIR report about the potential danger at the terminus of the Alternative 3 Trail, the one most of the committee seems to favor, although there were a few comments made at the hearing about this. This trail alternative empties into the North Rincon (Bates) Beach parking lot, which, when filled, holds approximately 150 cars. During the summer, this lot is filled with overflow spilling into illegal areas and angles and also onto Bates Road below. Anyone who parks there will testify how hard it is to see oncoming or passing cars or bicyclists driving past when pulling out of these right-angled parking spots. Near misses are common. With the anticipated additional traffic from the trail through the parking lot we feel there will be an increased number of accidents and not just near misses.

O1-4

Our recommendation: the parking lot be restriped so cars park at oblique angles instead of 90 degrees, in such a way as to increase visibility for drivers to see what is behind them. Also, that a designated bike lane be placed against the north side of the parking lot to help keep those exiting the Trail physically separate from the parked cars. This will have the net effect of slightly reducing the number of parking spaces, but it can be mitigated by installing an Uber/Lift pickup area near the restrooms so people can use alternative transport to the beach.

O1-5

Also as has been noted in a previous hearing, the parking lot is at the top of a steep hill, one which exceeds the recommended slope angle for ADA compliance. The trail is supposed to be ADA-accessible with the idea that the parking lot will act as the connector between the Carpinteria part of the trail and the Ventura County section of the trail that begins at the bottom of the parking lot hill. In our opinion, the steep angle of the hill is unsafe for bikes, skateboards, and people using other motorized scooters who may want to continue on the trail from Carpinteria to Ventura. They will pick up speed and be a danger to traffic at the intersection where the parking lot meets Bates Road. We have no suggestion for mitigation but feel someone smarter than us address this concern.

O1-6

We point out that the Alternative 4 trail avoids all parking lot dangers, even though we see the committee members at the hearing wanting to prioritize the ability to see the ocean from the second half of the Alternative #3 option as its highest priority. Therefore, these safety concerns must be addressed.

O1-7

We wish to add, however, that the EIR (page 2.15) states "Vehicle parking at the trailhead on the western end would be provided via an existing dirt lot adjacent to the Carpinteria Avenue terminus; no improvements to the informal dirt parking lot are proposed." This might solve the problem of reduced parking slots in the Rincon Beach parking lot, except that we see the city is considering using this area for an "auto camp" of permanent rental trailers. This park is not part of the Trail discussion, but we feel its possible intrusion must be considered as part of the parking lot discussion.

O1-8

4. Bridge Safety

This references Section 2.7.2 of the EIR and specifically page 2-12.

The EIR says: "...the bridge for the Carpinteria Rincon Trail will have some similar characteristics, except that UPRR requires high "safety fences" for the full length of the bridge to protect the trains from potential objects thrown from the bridge platform."

O1-9

There is no further description of these "high" fences, and we have a question about potential suicides from the bridge to the passing trains below. Can the committee please provide more complete information about this fencing and if they are designed to prevent any kind of climbing or jumping as well as the indicated tossing of objects onto the tracks below?

5. Wind Pattern Analysis and the Paragliders

This references Slide 19 of the presentation and also pages 3.3.6 of the EIR and several public speakers.

We sympathize with our friends in the paraglider community who claim that the loss of up to 30% of the wind uplift by Alternative #3 will effectively destroy their ability to exist at this beach. The testimony at the hearing downplayed this conclusion, as I heard at least one member of the panel claim the paragliders can operate safely with winds as low as a 10 to 20% loss (the EIR does not say that). The committee seems determined to ignore these hobbyists in favor of the hikers and bikers and the ocean view. We are sad to see this as the paragliders are a tradition at Bates Beach and definitely add to the ambiance and cultural heritage of the community. We are sorry to see the committee take their concerns so lightly. We want to go on record as supporting our flying friends and hope some compromise can be found.

O1-10

In conclusion we appreciate the ability to comment on the findings of the Environmental Impact Report and we hope our concerns will be address by the committee at a future hearing.

O1-11

Sincerely,



Gary Mussell
Director, Friends of Bate Beach

Response to Comment Letter 01

Friends of Bates Beach
Gary Mussell, Director
April 26, 2021

- 01-1** The City acknowledges the comment as an introduction to comments that follow. No further response is required.
- 01-2** The commenter expresses concern regarding effects of the water on the beach from the five drainage pipes that will be used to remove stormwater from the proposed trail and concerns regarding creation of stream gullies across the sand to the water from the end of the pipes. The commenter expresses concern that there is no discussion about long-term gullification associated with erosion.
- Comment is acknowledged. The creation of drainage gullies across the beach are not anticipated from the project, due to several reasons. First, the drainage area of the trail surface is small compared to the area within the project alignment, and therefore run-off volumes from the trail surface would be limited. Second, the southern portion of the trail would be served by 5 separate drain outlets, thereby dividing the entire volume of trail run-off into one fifth for each of the outlets. Third, each of the drain outlets would have rock rip-rap at the openings to dissipate the energy of the released water, avoiding the creation of gullies on the beach face. Finally, surface water run-off from the trail would primarily occur in winter, when the beach profile is regularly reworked and replenished by winter storm wave action.
- 01-3** The commenter suggests that the existing concrete brik-brak should be removed, as it is an existing safety hazard.
- Comment is acknowledged; however, the concrete debris mentioned in the comment is associated with a former state highway, and it is not the responsibility of the project to remove these remnants.
- 01-4** The commenter expresses safety concerns regarding Alternative 3, associated with cyclists traversing the parking lot located at the eastern terminus of the trail alignment.
- It is assumed that the commenter is referencing both the proposed project and Alternative 3, which each involve termination of the proposed trail at the western end of the Rincon Beach County Park parking lot. As discussed in Section 3.12 (Transportation) of the Draft EIR, the City's consulting traffic engineer determined there would not be a significant hazard associated with introducing additional cyclists traversing the Rincon County Beach Park parking lot. Vehicle maneuvers in the parking lot involve low speeds, and signage in the parking area would alert drivers to cyclists passing through the area. Signage at the terminus of the trail leading into the parking area would also alert cyclists to reduce speed and employ appropriate caution when riding through the parking lot.
- 01-5** The commenter provides recommendations for improving safety.
- The City acknowledges and appreciates the commenter's suggestions regarding bicycle safety. See Response 01-4 (above) for a response to bicycle safety concerns. No further response is required

because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

01-6 The commenter expresses concern regarding ADA compliance associated with the proposed project.

As discussed in Section 2.5 of the EIR, the existing benched slope with steep surface angle would be regraded in order to achieve compliance with ADA pathway slope requirements, making the project consistent with ADA requirements. It should be noted the refined Alternative 3 would incorporate a trail surface slope that marginally exceeds the maximum acceptable slope of 5 percent (the trail would have a slope of 6 percent) for a 690 foot portion of the segment south of the UPRR alignment. This marginally steeper slope surface may not result in a practical limitation to access by mobility challenged individuals, and an exception may be available in accordance with U.S. Access Board (USAB) guidelines for the 690-foot trail segment exceeding 5%, such that the entire trail could potentially achieve ADA compliance.

01-7 The commenter expresses support for Alternative 4, in particular relating to safety issues. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR.

The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

01-8 The commenter states that vehicle parking provided at the trailhead on the western end may solve the problem of reduced parking. However, the commenter expresses concern that the City is considering this location for an auto camp of permanent rental trailers and suggests that possible intrusion is considered in the EIR.

Comment is acknowledged. The informal dirt parking area at the eastern terminus of Carpinteria Avenue is within the City-owned right-of-way for Carpinteria Avenue and would not be affected by potential future development of an auto camp on the adjacent privately-owned parcel.

01-9 The commenter expresses safety concerns regarding the proposed bridge, especially regarding climbing, jumping, and tossing objects into the tracks below.

As a facility constructed within their right-of-way, UPRR has approval authority for the final bridge design and will ensure it is consistent with their safety standards regarding the expressed concerns of the commenter. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

01-10 The commenter expresses concern regarding the loss of 30 percent of wind uplift and expresses support for the soaring community and their inability to use this site once the project is approved.

Please refer to Global Response GR1.

01-11 The commenter provides a concluding statement.

The City acknowledges the comment and notes that it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required or provided.



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April 15, 2021

City of Carpinteria
 c/o: Matt Roberts, Parks & Recreation Director
 5775 Carpinteria Avenue
 Carpinteria, CA 93013

Subject: Support of the Steeper Slopes/Reduced Earthwork Alternative (Alternative 3) as the environmentally superior alternative in the Carpinteria Rincon Multi-Use Trail Draft Environmental Impact Report (DEIR).

Dear Mr. Roberts:

Thank you for the opportunity to review and provide comment on the DEIR for the Carpinteria Rincon Multi-Use Trail project (project). SBCAG appreciates its partnership with the City of Carpinteria to advance this project to complete a long-standing gap in the statewide California Coastal Trail, improve public safety, and enhance non-vehicular travel alternatives along the Highway 101 corridor that connects communities and regional coastal resources. SBCAG respectfully submits the following comments in support of Steeper Slopes/Reduced Earthwork Alternative (Alternative 3), as the environmentally superior alternative as expressed in the project's DEIR.

L1-1

SBCAG agrees that Alternative 3 meets stated project objectives while reducing overall environmental impacts, including reducing the volume of earthwork required for the project i.e., 15,000 less cubic yards (approximately an eight percent reduction) translating to fewer haul trucks and greenhouse gas emissions during construction. It also reduces construction-related noise impacts and has less of an impact upon recreational options, specifically in regard to concerns expressed for paragliding and hang-gliding activities occurring on private properties above the trail alignment. In addition to the DEIR, SBCAG recognizes that Alternative 3 reflects a design that has advanced and gained approvals from Union Pacific Railroad, California Public Utilities Commission, and other stakeholders. It is also the only alternative that can be delivered within the timeline for construction to meet a funding deadline of June 2022, since other alternatives are more preliminary in nature and would require significant re-design efforts.

L1-2

Again, SBCAG appreciates the opportunity to provide comments on the DEIR and looks forward to reviewing the Final Environmental Impact Report. SBCAG has long valued coordination with partner agencies like the City of Carpinteria to bring about important multi-use opportunities in our region and along the Highway 101 corridor. If you have any questions regarding this response, please call Fred Luna, SBCAG Director of Project Delivery and Construction, at (805) 961-8926 or by email at fluna@sbacag.org.

L1-3

Sincerely,

Marjie Kirn, Executive Director
 Santa Barbara County Association of Governments

Member Agencies

Buellton ■ Carpinteria ■ Goleta ■ Guadalupe ■ Lompoc ■ Santa Barbara ■ Santa Maria ■ Solvang ■ Santa Barbara County

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Response to Comment Letter L1

Santa Barbara County Association of Governments

Marjie Kirn

April 15, 2021

- L1-1** The City acknowledges the comment as an introduction to comments that follow. No further response is required.
- L1-2** The commenter provides general support for Alternative 3 and agrees that it would reduce potential environmental impacts. The comment does not raise any issue concerning the adequacy of the Draft EIR. No response is required.
- L1-3** The City acknowledges the comment as conclusionary remarks. No further response is required.

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Hi Nick –

The Carpinteria Sanitary District commented on this project in late 2019. Refer to the attached letter, which we suggest be added to the record for CEQA purposes. Based on the critical nature of sewer infrastructure in the vicinity of the City's proposed project, we offer the following additional comments on the DEIR.

L2-1

- Extension of the trail on the freeway side of the bluff east of the railroad crossing, if this is the selected or preferred alternative, must not interfere with or in any way compromise the District's existing 4-inch diameter HDPE force main in this location. Civil design should be coordinated to ensure this outcome.
- Within the entire project area, the trail design should ensure that the District has continued access to the 4-inch diameter HDPE force main located parallel to US 101 and approximately 5 feet south of the southbound shoulder. The proposed trail should not inhibit or impair future access, up to and included excavation for repair and/or replacement of the existing pipeline.
- DEIR Appendix K evaluates extended routes through the Rincon Beach Park. Aerial images for the graphics in this appendix do not show the District's wastewater lift station. Although this critical infrastructure is mentioned in the narrative, it is unclear how the City intends to construct a pathway in proximity to this facility. It is crucial that this facility remain accessible at all times for emergency response and that pipelines and buried infrastructure be protected. The District has a legal easement from the County of Santa Barbara in this vicinity for both buried and surface improvements.

L2-2

L2-3

L2-4

Thank you for the opportunity to comment on this project.

L2-5

Craig Murray, P.E.
General Manager
Carpinteria Sanitary District
5300 Sixth Street
Carpinteria, CA 93013
P 805.684.7214 x112
C 805.451.7804

NOTE: Our Administration Office has temporarily relocated to 1110 Eugenia Place. Please continue to use 5300 Sixth Street as our mailing address.



CARPINTERIA
Sanitary District

5300 Sixth Street
Carpinteria, CA 93013

Phone (805) 684-7214 • Fax (805) 684-7213

October 31, 2019

Nick Bobroff
Community Development Department
City of Carpinteria
5775 Carpinteria Avenue
Carpinteria, California 93013

**Subject: Project No. 19-2015-CUP/CDP
Carpinteria Rincon Trail Project**

Dear Mr. Bobroff;

Thank you for the opportunity to provide comments on the subject project. The project applicant proposes to construct a 2,800-foot long paved multi-use trail extending from the eastern terminus of Carpinteria Avenue in the City of Carpinteria to Rincon Beach Park in the County of Santa Barbara, near the Ventura County line. The proposed trail would be 16 feet in width (comprised of a 10-wide path with a 3-foot paved shoulder along each side of the trail). The trail project includes a new 160-foot long clear span pre-fabricated bridge crossing over the UPRR alignment. Grading and earthwork quantities necessary to cut the trail bench and stabilize slopes in the project area estimated at 104,000 cubic yards of cut, 10,300 cubic yards of which would be used for fill on-site. The remaining 94,000 cubic yards of cut material would be exported offsite. A storm drain collection system is proposed for the trail alignment, with new drain outlets to the ocean.

The Carpinteria Sanitary District (District) has the following initial comment:

- The District has a 4-inch diameter HDPE sewer force main that is located immediately north (5 feet to 30 feet) of the proposed trail alignment. At stations 21 through 23.5, the proposed trail is approximately five (5) horizontal feet from the force main. It also appears the proposed trail is 5 to 10 vertical feet from the force main. This force main is a high priority subsurface installation that provides sewer service to the Rincon Point community.
- Contractors excavating, boring, drilling, sinking fenceposts or other subsurface work must take extreme precaution to ensure the force main is protected during the construction of the trail. The District should be notified when excavation activities are occurring between stations 21 through 24. This should be noted on the construction drawings.

L2-6

L2-7

L2-8

If you have any questions regarding the comments provided by the District, please contact me at (805) 684-7214, ext. 13.

I L2-9

Sincerely,
CARPINTERIA SANITARY DISTRICT

Lance Lawhon
Engineering Technician

C: Bengal Engineering

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Response to Comment Letter L2

Carpinteria Sanitary District
Craig Murray, PE
March 15, 2021

- L2-1** The comment references a previous letter, provided to the City by Carpinteria Sanitary District. Responses to the referenced letter are provided in comments L2-6 through L2-9, below. The comment also introduces comments that follow. No further response is required.
- L2-2** The comment expresses concern regarding potential interference with Carpinteria Sanitary District's 4-inch high-density polyethylene (HDPE) force main associated with extension of the proposed trail on the freeway side of the bluff, east of the railroad crossing.
- The location of the force main and the need to exercise extreme caution during project construction located in close proximity to the force main will be noted on plans; in order to heighten overall awareness, the sewer force main location will be surveyed and flagged in the field for those sections immediately adjacent to project construction work zones..
- L2-3** The comment expresses concern regarding access to the 4-inch HDPE force main.
- The location of the force main and requirements to preserve access to this force main location following project construction will be noted on plans; in order to heighten overall awareness, the sewer line location will be surveyed and flagged in the field for those sections immediately adjacent to project construction work zones. The City will also make compliance with the comments in this letter a project condition of approval of the CUP/CDP.
- L2-4** The comment expresses concern regarding the Carpinteria Sanitary District's wastewater lift station and ensuring that this facility remains accessible at all times for emergency response and that pipelines and buried infrastructure are protected.
- Comment is noted. The existing wastewater lift-station along the north side of the Rincon Beach County Park would only be within the potential alignment for Alternative 4. Should Alternative 4 be implemented for development of the trail, the final trail engineering design would be required to avoid impacts to the wastewater lift station and connected sewer lines.
- L2-5** The City acknowledges the comment as conclusionary remarks. No further response is required.
- L2-6** This comment provides an accurate summary of the project and does not raise any issue concerning the adequacy of the Draft EIR. No response is required.
- L2-7** This comment outlines the location of the 4-inch HDPE force main.
- Thank you for identifying the location of District sewer collection lines in the project vicinity.
- L2-8** The comment expresses concern regarding the existing HDPE force main and requests that the City takes precaution during construction in this area. The commenter requests that the City notifies the

Carpinteria Sanitary District when excavation occurs between stations 21 through 24 and requests the location of these facilities be identified on construction drawings.

The location of sewer lines and the need to contact the District for work near these lines will be noted on plans. In order to heighten overall awareness, the sewer line location will be surveyed and flagged in the field for those sections immediately adjacent to project construction work zones. The City will also make compliance with the comments in this letter a project condition of approval of the CUP/CDP.

L2-9 The City acknowledges the comment as conclusionary remarks. No further response is required.



County of Santa Barbara Planning and Development

Lisa Plowman, Director
Jeff Wilson, Assistant Director
Steve Mason, Assistant Director

May 3, 2021

Nick Bobroff, City of Carpinteria
5775 Carpinteria Avenue,
Carpinteria, CA 9301
Email: nickb@ci.carpinteria.ca.us

Re: Carpinteria Rincon Multi-Use Trail Notice of Preparation for an Environmental Impact Report – Public Comment

Dear Mr. Bobroff:

The County of Santa Barbara Planning and Development Department reviewed the City of Carpinteria's Rincon Multi-Use Trail Environmental Impact Report (EIR) and appreciates the opportunity to provide the comments listed below.

1. Alternatives Analysis

- The County of Santa Barbara requests that the alternatives in the EIR are analyzed such that any alternative can be approved during the County of Santa Barbara's permitting process. Specific analysis, such as project information, grading quantities, and mitigation measures for each project alternative, is requested to be included in the EIR.

2. Trail Location

- The alternatives analysis should discuss the ocean views visible from the trail and access to coastal resources as well as the required earthwork for the proposed alignment and for all alternative alignments.

3. Policy Consistency

- The County's permit will include a policy consistency analysis with the County's Comprehensive Plan. It is recommended that the EIR provide information throughout the document, and specifically in the Land Use section, to address the relevant County policies, including:

Recreation

- Coastal Land Use Plan Policy 7-33:** To encourage walking and biking as alternatives to travel by automobile, the County shall strongly encourage development of

L3-1

L3-2

L3-3

L3-4

new pedestrian and/or bicycle-friendly paths along the highway corridor. Improvements to Highway 101 shall not remove existing bikeways or pedestrian paths or preclude the development of proposed bikeways or pedestrian paths that are identified in the County's Comprehensive Plan, Coastal Land Use Plan and community plans, without providing comparable or better replacement facilities.

- **Coastal Act 30211.** Development shall not interfere with the public's right of access to the sea where acquired through use, custom, or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.
- **Coastal Act Policy 30252.** The location and amount of new development should maintain and enhance public access to the coast by: (1) facilitating the provision or extension of transit service; (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads; (3) providing non-automobile circulation within the development; (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation; (5) assuring the potential for public transit for high-intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of on-site recreational facilities to serve the new development.
- **Coastal Act Policy 30210.** In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners and natural resource areas from overuse.
- **Coastal Act Policy 30212.5** Wherever appropriate and feasible, public-facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.
- **Coastal Act Policy 30213.** Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.
- **CLUP Policy 7-8:** Increased opportunities for beach access shall be provided in the Carpinteria planning area.

L3-4
Cont.

Geologic:

- **CLUP Policy 3-13:** Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.
- **CLUP Policy 3-14:** All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited for development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

Environmentally Sensitive Habitat:

- **Coastal Act Policy 30240 (b).** Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

Visual:

- **Coastal Act Policy 30251.** The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.
- **CLUP Policy 4-3:** In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.

Transportation:

- **Circulation Element Policy 5C:** The County shall continue to develop programs that encourage the use of alternative modes of transportation including, but not limited to, an updated bicycle route plan, park and ride facilities, and transportation demand management ordinances.

5. Future Notices

When they become available, please send a copy of all notices of City decision-maker hearings regarding the project and the Final EIR Notice of Determination to:

L3-4
Cont.

L3-5

- Dan Klemann, Deputy Director of Long Range Planning, via email at dklemann@countyofsb.org or mail at 123 E. Anapamu Street, Santa Barbara, CA 93101.
- Ciara Ristig, Senior Planner, via email at cristig@countyofsb.org or mail at 123 E. Anapamu Street, Santa Barbara, CA 93101
- Tess Harris, Supervising Planner, via email at tharris@countyofsb.org or mail at 123 E. Anapamu Street, Santa Barbara, CA 93101

L3-5
Cont.

Thank you for the opportunity to provide comments on the Draft EIR. If you have any questions or require further information, please contact me at (805) 568-2086 or Mr. Seawards at (805) 568-2518.

Regards,



Lisa Plowman, Director
Planning & Development Department

cc: Travis Seawards, Deputy Director, Development Review Division
Dan Klemann, Deputy Director, Long Range Planning Division
Tess Harris, Supervising Planner, Development Review Division
Ciara Ristig, Senior Planner, Development Review Division
File

Response to Comment Letter L3

County of Santa Barbara Planning and Development
Lisa Plowman
May 3, 2021

L3-1 The City acknowledges the comment as an introduction to comments that follow. No further response is required.

L3-2 The commenter requests that the City analyzes each alternative outlined in the DEIR, and includes specifics such as project information, grading quantities, and mitigation measures.

Per CEQA Guidelines Section 15126.6(d), an EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (*County of Inyo v. City of Los Angeles* (1981) 124 Cal.App.3d 1). The analysis of the project did not identify any unavoidable significant impacts, which is the paramount consideration for the development of alternatives to the proposed action. However, given potentially significant impacts were identified, the EIR included four distinct alternatives to the project, each with an intent to lessen or avoid the significant impacts of the proposal. Information on each alternative, including involved grading quantities, has been provided in Section 6.0; the relative severity of each impact is also compared to the project, and the necessity under each alternative for implementation of mitigation measures identified for project impacts is identified. Therefore, per CEQA Guidelines Section 15126.6(d), a full analysis of each proposed alternative, including specific mitigation measures to address unique impacts of such an alternative, is not required.

Rather, the alternatives analysis is intended to identify whether the proposed project, or an alternative to the proposal, has the greatest potential for minimization of environmental impacts, while achieving the primary objectives of the proposed project. Insofar as several alternatives appear to offer opportunities to reduce impacts as compared to the proposed project, as much detail as possible is provided regarding the impacts and mitigations associated with each of the alternatives, although subsequent environmental review to satisfy CEQA may need to be performed in some issue areas if one of the alternatives is selected for implementation in favor of the proposed project.

L3-3 The commenter requests that the alternative analysis discusses ocean views visible from the trail, access to coastal resources, and required earthwork for the proposed alignment and all alternative alignments.

See response L3-2, above. The alternative analysis included an analysis of aesthetic and recreational impacts, as they compare to the proposed project, consistent with CEQA Guidelines Section 15126.6(d). In addition, per Section 6.6 of the Draft EIR, Alternative 2 would result in 46,000 cubic yards (CY) of cut and 10,500 CY of fill; Alternative 3 would result in 96,077 CY of cut and 10,570 CY of fill, and Alternative 4 would result in 105,300 CY of cut and 710 CY of fill.

- L3-4** The commenter suggests that various policies from the County of Santa Barbara (County's) Comprehensive Plan should be included in the EIR. These policies have been added in Section 3.9.2 of the EIR (see Chapter 3, Errata).
- L3-5** The commenter requests that future notices are sent to addresses for County representatives provided in this comment. The City will provide notices to the County representatives at addresses indicated in this comment. No further response is required.



COUNTY of VENTURA

RESOURCE MANAGEMENT AGENCY
CHARLES R. GENKEL
 Environmental Health Director

April 27, 2021

City of Carpinteria
 Community Development Department
 5775 Carpinteria Avenue
 Carpinteria, CA 93013
 ATTN: Nick Bobroff, Principal Planner

Carpinteria Rincon Trail, Environmental Document Review – Notice of EIR Preparation, (RMA REF # 19-012-1)

Ventura County Environmental Health Division (Division) staff reviewed the information submitted for the subject project. Proposed Carpinteria Rincon Multi-Use Trail (Project) includes the construction of:

- A shared use trail;
- A clear-span bridge;
- A stormwater drainage collection system with new drain outlets to the ocean up to the western end of Rincon Beach County Park and the Ventura County Line in Santa Barbara County.

L4-1

The Division provides the following comments:

1. Project includes the construction of three new stormwater drainage outlets south of the Union Pacific Railroad alignment. California Health and Safety Code, Section 115880 (c) (4) (B), requires that testing shall be conducted on a weekly basis if the beach is located on an area adjacent to a storm drain that flows in the summer. Contact the State Water Resources Control Board, Ocean Standards Unit for any changes with Santa Barbara County's sampling sites.
2. The construction and use of the stormwater drainage outlets have the potential for proliferation of vectors, including mosquitoes. Monitoring and controlling mosquito activities from these sites can reduce exposure of the public from vector-borne diseases.

L4-2

L4-3

If you have any questions, please contact me at 805/654-5040 or Paolo.Quinto@ventura.org.

Paolo Quinto, R.E.H.S.
 Land Use Section
 Environmental Health Division

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Response to Comment Letter L4

County of Ventura Community Development Department
Paolo Quinto
April 27, 2021

L4-1 The City acknowledges the comment as an accurate overview of the project and an introduction to comments that follow. No further response is required.

L4-2 The commenter states that weekly testing shall be conducted for the new stormwater drainage outlets, which should be coordinated with the State Water Resources Control Board, Ocean Standards Unit.

This comment does not raise any issue concerning the adequacy of the Draft EIR. Testing and sampling of proposed stormwater drainage outlets shall be performed in accordance with all existing laws and regulations. No further response is required.

L4-3 The commenter expresses concern regarding the proliferation of vectors, including mosquitoes, associated with new stormwater drainage outlets and recommends monitoring and controlling mosquito activities from these sites to reduce exposure to vector-borne diseases.

This comment does not raise any issue concerning the adequacy of the Draft EIR. The City appreciates the recommendation regarding monitoring and control of mosquitos; it is anticipated that the City and County will both follow guidelines and practices established by the Mosquito and Vector Management District of Santa Barbara County in the maintenance procedures for their respective portions of the trail alignment. No further response is required.

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****EXTERNAL EMAIL****

CAUTION: This email originated from outside the City of Carpinteria. DO NOT OPEN attachments or CLICK on links unless you are sure they are safe. Remember, reputable vendors, banks, etc. will not ask you to disclose passwords or other sensitive information.

Thanks Nick, it must wrench on your soul to know you are killing a magical recreational activity (paragliding/hang gliding) for so many people in our beautiful, unique little town. I think you are a surfer and can relate. Hope you get outside and play more than you dont, life is short.

Aaron LaPlante

I
I1-1

Response to Comment Letter I1

Aaron LaPlante
March 12, 2021

- I1-1** The City acknowledges the comment as general opposition to the project. No further response is required.

****EXTERNAL EMAIL****

CAUTION: This email originated from outside the City of Carpinteria. **DO NOT OPEN** attachments or **CLICK** on links unless you are sure they are safe. Remember, reputable vendors, banks, etc. will not ask you to disclose passwords or other sensitive information.

Mr.Nick

8 very much disturbs me. That the EIR, still does not have the monarch butterfly habitat that is there. It doesn't have the migratory bird act.

The monarchs are in the eucalyptus trees on the East Side of the freeway there as well as the multi million dollar homes each year. The migratory birds fly up-and-down that cliff face by weekly to Tri weekly from the carpenter Rhea salt March to the Venter a salt marsh all of these are going to be affected drastically! The endangered species of plant life on the front of that cliff face isn't even being considered. How is this possible under federal law? How is this no concern to your environmental impact report?

I2-1

I2-2

Response to Comment Letter I2

E. Arciniega
April 9, 2021

I2-1 The commenter expresses concern regarding the presence of monarch butterfly habitat, stated in the comment letter to be present in eucalyptus trees on the East Side of the freeway and the absence of discussion regarding the Migratory Bird Treaty Act.

As discussed in Section 3.3.4, impacts to monarch butterfly individuals and monarch butterfly overwintering sites would be less than significant. Although monarch butterflies are known to occur near the project site along Bates Road just north of U.S. Highway 101 in a eucalyptus stand associated with Rincon Creek, no impacts to this monarch overwintering site are anticipated since the overall height of the slope within Rincon Beach County Park south of Highway 101 will not be reduced, as work includes proposed terraces to stabilize the hill but will not decrease its overall height, and therefore no changes to the wind conditions at the overwintering site are expected. Additionally, this overwintering site is largely protected by the hill below the single residential development at 637 Bates Road, and any possible changes to weather and wind patterns due to project implementation would not affect the protective contour this hill independently provides. In addition, as discussed in Section 3.3.4, 22 species of native birds were detected on site, including several with the potential to nest there. Nests, eggs and nestlings of all native bird species are protected by the Migratory Bird Treaty Act and the California Fish and Game Code, as discussed in Section 3.3.4 of the Draft EIR. Vegetation clearing and grading, if occurring during the nesting season (typically mid-February to August), have the potential to destroy nests, eggs and nestlings, which could violate these regulations. However, with implementation of MM-BIO-1, MM-BIO-2, and MM-BIO-6, project impacts to nesting and migratory birds would be reduced to less than significant.

I2-2 The commenter expresses concern regarding endangered plant species on the cliff face.

As discussed in Section 3.3.4, no special-status plant species were observed; thus, impacts to special-status plant species would be less than significant.

****EXTERNAL EMAIL****

CAUTION: This email originated from outside the City of Carpinteria. DO NOT OPEN attachments or CLICK on links unless you are sure they are safe. Remember, reputable vendors, banks, etc. will not ask you to disclose passwords or other sensitive information.

Ok so....
Mr.Nick

It still very much disturbs me. That the EIR, still does not have the monarch butterfly habitat that is there. It doesn't have the migratory bird act. It doesn't even have a true Wind report on it!

I 13-1
I 13-2

The monarchs are in the eucalyptus trees on the East Side of the freeway there as well as the multi million dollar homes each year. That will be highly affected by your committees ignorance. The migratory bird act, that fly up-and-down that cliff face bi to Tri weekly from the Carpinteria salt Marsh. to the Ventura salt marsh all of these are going to be affected drastically! The endangered species of plant life on the front of that cliff face isn't even being considered. How is this possible under federal law? How is this no concern to your environmental impact report?

I
I 13-3

How is this Committee Bypassing FEDERAL LAW? How are you ignoring a nearly endangered Species monarch butterfly flies?
The TUFFEST migratory bird acts known thruout the USA? Based here in CA?
Endsngered plant life Species that a big growing on the front of that Hill for well since the old highway was there they've been there for decades one of very few areas they actually grow in our whole state

I 13-4

Turning a blind eye, to these things, will get you nowhere. Want you start your gonna have to replace at all. Costing you hundreds of millions of dollars. For the 6 million dollars year after.

I 13-5

To top it off this trail is not Ada compliant. Simply because it is Ada compliant from highway 150 down to the park it does not meet Ada compliancy down through the parking lot to connect to the other trail. That is also not Ada compliant coming out of the parking lot.

I 13-6
I

Response to Comment Letter I3

E. Arciniega
April 9, 2021

- I3-1** The commenter expresses concern regarding an absence of reference in the EIR to monarch butterfly habitat and the Migratory Bird Treaty Act.
- See response I2-1, above.
- I3-2** The commenter states that no true wind report was included.
- A detailed analysis of the alterations to air flow patterns above the bluffs resulting from project implementation was completed for the EIR; the Airflow Analysis report was provided as Appendix I of the Draft EIR. The comment does not pertain to the adequacy of the EIR. No further response is required.
- I3-3** The commenter expresses concern regarding the presence of monarch butterfly habitat, stated in the comment letter to be present in eucalyptus trees on the East Side of the freeway; the Migratory Bird Treaty Act; and endangered plant species. The commenter believes that the project does not comply with federal law regarding monarch butterflies and the Migratory Bird Treaty Act.
- See response I2-1, above.
- I3-4** The commenter expresses concern regarding endangered plant species.
- See response I2-2, above.
- I3-5** The commenter expresses general opposition to the project and economic concerns. The comment does not pertain to the adequacy of the EIR. No response is required.
- I3-6** The commenter expresses concern that the proposed trail is not compliant with the Americans with Disabilities Act of 1990 (ADA).
- As discussed in Section 2.5 of the EIR, the existing benched slope would be regraded in order to achieve compliance with ADA pathway slope requirements, making the project consistent with ADA requirements. It should be noted the refined Alternative 3 would incorporate a trail surface slope that marginally exceeds the maximum acceptable slope of 5 percent (the trail could have a slope of 6 percent) for a 690 foot portion of the segment south of the UPRR alignment. This marginally steeper slope surface may not result in a practical limitation to access by mobility challenged individuals, and an exception may be available in accordance with USAB guidelines for the 690-foot trail segment exceeding 5 percent, such that the entire trail could potentially achieve ADA compliance. The comment does not pertain to the adequacy of the EIR. No further response is required.

Hi Nick, I encourage you to take a progressive approach to parks and rec and embrace the unique sport of paragliding and hang gliding in Carpinteria.

I4-1

There are no federal rules that prevent free flight on the bluff and any local rules would be superceded by the Federal Aviation Administration.

I4-2

Dubai built a 1200 foot high mini mountain just for free flight that people come to from all over the world. I am sure you can create a one of a kind flight park at the Bluff and have a bike path too. What a tourist attraction that would be!

I4-3

Love ya mahn!

Aaron

 Aaron LaPlante
 Carpinteria Unified School District
805-886-1435
aaron@cusd.net

Response to Comment Letter I4

Aaron LaPlante
March 12, 2021

- I4-1** The commenter expresses general opposition to the project, which does not pertain to the adequacy of the EIR. No further response is required.
- I4-2** The commenter states that no existing federal rules prevent free flight at the project site and local rules would be superseded by the Federal Aviation Administration. This comment does not pertain to the adequacy of the EIR. No further response is required.
- I4-3** The commenter provides a description of an artificial 1,200-foot high mountain that was constructed to support free flight opportunities and suggests that the City consider creating something like this instead of the proposed project. This comment does not pertain to the adequacy of the EIR. No further response is required.

It still very much disturbs me. That the EIR, still does not have the monarch butterfly habitat that is there. It doesn't have the migratory bird act. It doesn't even have a true Wind report on it!

15-1
15-2

The monarchs are in the eucalyptus trees on the East Side of the freeway there as well as the multi million dollar homes each year. That will be highly affected by your committee's ignorance. The migratory bird act, that fly up-and-down that cliff face bi to Tri weekly from the Carpinteria salt Marsh. to the Ventera salt marsh all of these are going to be affected drastically! The endangered species of plant life on the front of that cliff face isn't even being considered. How is this possible under federal law? How is this no concern to your environmental impact report?

15-3

How is this Committee Bypassing FEDERAL LAW? How are you ignoring a nearly endangered Species monarch butterfly flies?

The TOUGHEST migratory bird acts known throughout the USA? Based here in CA?

Endangered plant life Species that a big growing on the front of that Hill for well since the old highway was there they've been there for decades one of very few areas they actually grow in our whole state

15-4

Turning a blind eye, to these things, will get you nowhere. Once you start you're gonna have to replace it all. Costing you hundreds of millions of dollars. For the 6 million dollars a year after.

15-5

To top it off this trail is not Ada compliant. Simply because it is Ada compliant from highway 150 down to the park it does not meet Ada compliance down through the parking lot to connect to the other trail. That is also not Ada compliant coming out of the parking lot. This trail is a True FAILURE on Both ends!!! It is going to cost the city Millions of dollars in the end.

15-6

The Air flow report IS Not one done in that area. It does not even correspond to the project. OUR MILLION Dollar homes are going to be SEVERELY AFFECTED! Once this hill is CUT away at such a slope. The perfect Wind Shadow that is built by Nature and the Current slope. SHIELDS our Homes from MOST of the 40-50MPH winds post frontal with each storm. Allowing the Monarchs to be here throughout the winter protected in all of our trees.

15-7

A true Fallacy, is being pushed in search of exactly what?

15-8

A State ruling that is not in compliance with Regulations and FEDERAL LAW!~! All being ignored!~!

On Thu, Apr 8, 2021, 3:34 PM Nick Bobroff <nickb@ci.carpinteria.ca.us> wrote:

Response to Comment Letter I5

E. Arciniega
April 14, 2021

- I5-1** The commenter expresses concern regarding the presence of monarch butterfly habitat and an apparent neglect of requirements of the Migratory Bird Treaty Act.
- See response I2-1, above.
- I5-2** The commenter states that no wind report was included.
- See response to I3-2, above.
- I5-3** The commenter expresses concern regarding the presence of monarch butterfly habitat, stated in the comment letter to be present in eucalyptus trees on the East Side of the freeway; the Migratory Bird Treaty Act; and endangered plant species. The commenter believes that the project does not comply with federal law regarding monarch butterflies and the Migratory Bird Treaty Act.
- See response I2-1, above.
- I5-4** The commenter expresses concern regarding endangered plant species.
- See response I2-2, above.
- I5-5** The commenter expresses general opposition to the project and economic concerns. The comment does not pertain to the adequacy of the EIR. No response is required.
- I5-6** The commenter expresses concern that the proposed trail is not compliant with ADA and expresses economic concerns associated with the project.
- As discussed in Section 2.5 of the EIR, the existing benched slope would be regraded in order to achieve compliance with ADA pathway slope requirements, making the project consistent with ADA requirements. The proposed project would terminate at the west (north) end of the parking lot for Rincon Beach County Park, and would not modify conditions present in the parking lot or the roadway segment at the south end of the parking lot; as such, the concerns expressed by the commenter regarding ADA compliance of the parking lot and southern vehicle exit to the parking area are not applicable to the proposed project. In addition, the City acknowledges that this comment raises economic issues that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.
- I5-7** The commenter expresses concern regarding the Airflow Analysis provided as part of the Draft EIR and states that this Airflow Analysis does not correspond to the project. In addition, the comment expresses economic concerns associated with proposed cut slopes, and concerns regarding the monarch butterfly.

Refer to global response GR1 regarding the air flow analysis and determination of project impacts on existing soaring opportunities. Regarding the commenter's economic concerns, the City acknowledges the comment and notes that it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. Regarding monarch butterfly concerns, please refer to response I2-1, above. No further response is required.

I5-8 The commenter express general opposition to the project and states that the project is not in compliance with federal law.

The comment does not pertain to the adequacy of the EIR. Regarding the commenter's previous concerns associated with compliance with federal law regarding monarch butterflies and the Migratory Bird Treaty Act, please see response I2-1, above. No further response is required.

Nick, I understand there are some changes to the Bates soaring hill in Carpenteria. I've traveled to Carpenteria many times to bike and also fly Bates, with the proposed changes to accommodate a bike trail. I must tell you that the bike trail would probably be best on the other side to avoid the congestion of a parking lot and as a pilot I believe the change to the Bates hill will significantly reduce the available lift.

With Bates soaring ruined I'll no longer visit Carpenteria. I hope you value the input from pilots who love Bates and select an alternative bike path. Thank you for your attention. S. Wuebber Belgrade, MT

I6-1

Response to Comment Letter I6

Scott Wuebber

April 16, 2021

I6-1 The commenter expresses support for the construction of the proposed trail on the freeway side of the ridge-top (Alternative 4) to avoid congestion of the parking lot and to prevent project-related reductions in the existing available lift along the bluff-top for soaring activities.

It is assumed that the commenter supports Alternative 4 instead of the proposed project. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

Hi Nick, I've written to you before but wanted to reach out again and ask that you consider all proposals that would allow all users of the area under discussion to enjoy this magic spot.

As an active cyclist living in Ojai, I have to tell you that the section of 101 that we take from the overpass down to the offramp is a stretch I look forward to as I can coast and hit decent speed, oftentimes giving me a nice break before that long exposed stretch past Rincon and La Conchita.

Paragliding is another passion of mine and Bates is a world class site. Surely we can find a way that works for everyone.

Please do everything you can to help ensure that we don't lose this site.

I'm happy to discuss at any time and appreciate your consideration and time.

Best,

M.

Myles Connolly

International Mobile: +1 949 338 2987

Email: contactmyles@yahoo.com

Skype: mylesconnolly

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I7-1

Response to Comment Letter I7

Myles Connolly
April 16, 2021

- I7-1** The City acknowledges the comment and notes that it expresses opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

Nick Bobroff

April 16, 2021

Principal Planner

Community Development Department

City of Carpinteria 5775 Carpinteria CA 93013

Hello Mr. Bobroff and readers of this letter,

During the Zoom Webinar meeting on April 13, 2021, Alternative #4, which would mostly be built next to the Southbound 101 freeway, was unanimously supported by the Environmental Review Committee, as the "Environmentally Superior Alternative." I agree.

18-1

Several questions asked during the meeting, were left unanswered and several conclusions, of the Focused Environmental Impact Report, did not seem to be an adequate or a complete analysis. I hope those questions can be answered and given to the public and the summary of the conclusions can be adjusted to be more reasonable and be supported by applicable information and facts, for the previous Alternative, and the recommended Alternative.

18-2

In the City of Carpinteria, except for that portion of the current bike route that is on the Southbound, US highway 101 bridge, between highway 150 and Bates Road, which is approximately 14 feet wide, there is no portion of the bike route, that is close to being 16 feet wide. With the choice of the Committee being Alternative #4, that width can and should be no wider, than 8 feet (with a few exceptions, for "Switchbacks,"). This will be more in harmony with the landscape and closer to the Project Description (see attachment 1). Reducing the width of the bridge over the Union Pacific Railroad Crossing to 8 feet wide and making it more in line with the Southbound 101 freeway, will be a significant cost savings and less intrusive, to the environment.

18-3

The presentation on April 13, showed an aerial depiction of the "Little Diamondhead," Bluff (to the west of the County parking lot) as having "...existing drainage pipes." There are rusted remnants of corrugated drain pipes, but there are no existing, functional drain pipes, as depicted by the diagrams presented (See attachments 2, 2a, 2b, 2c, 2d.) in the Zoom meeting. My attachments (except #2) show current conditions, but do reflect conditions, that I have seen, in 15 years of flying at Bates. One large, rusted section, ended up on the beach, and laid there for months, until high tide, took it out to sea.

18-4

I will submit additional comments and questions and attachments, during the public comment window to do so.

18-5

Respectfully,

Ottis Gillespie

Oxnard, CA 93036

1



SOURCE: Bengal Engineering

Illustration 4 Representative Steel Framed Bikepath Bridge

The approximate location of the Carpinteria Rincon Trail bridge over the UPRR alignment (the magenta colored line) is shown in Illustration 5, below. The relative elevation of the bridge can be compared to the US Highway 101 bridge over the UPRR corridor (just above the elevation of the pictured train).



SOURCE: Bengal Engineering

Illustration 5 Approximate Profile and Location for Rincon Trail Bridge

Drainage

The proposed trail project includes an integrated storm drainage system to ensure storm water run-off from the recontoured bluff face and the trail surface is conveyed to the ocean efficiently, avoiding potential erosion of slopes along the trail alignment. Along the portion of the trail north of the UPRR alignment, a concrete swale (v-ditch) would convey water along the trail edge, where it would be released into an existing surface drainage swale now serving US Highway 101. This swale connects to an existing storm drain that crosses underneath the UPRR alignment, and then descends to the beach level. This storm drain is labelled as "1" in illustration 6. No improvements are proposed to storm drain 1, and the trail storm drain volumes contributed to this storm drain would be negligible compared to existing flows already contributed from portions of US Highway 101.



SOURCE: Bengal Engineering

Illustration 6 Major Storm Drainage Components of the Project

On the south side of the UPRR alignment, a concrete drainage swale would also carry surface run off from the recontoured bluff face and trail, conveying such drainage along the side of the trail until it reaches one of the storm drain inlets lower in elevation. A total of 5 vertical storm drains would convey this storm water from the trail to the beach elevation, for the trail segment south of the UPRR alignment (refer to Illustration 6). Drains #3 and #6 (shown in light blue in illustration 6) are existing and would be re-used, including rehabilitation of existing piping; drains #2, #4, and #5 (shown in magenta in illustration 6) would be newly developed for the project.



18-6
Cont.

26



18-6
Cont.



18-6
Cont.



18-6
Cont.

Response to Comment Letter I8

Ottis Gillespie
April 16, 2021

- I8-1** The commenter expresses support for Alternative 4. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I8-2** The commenter states that questions were left unanswered during the meeting held on April 13, 2021, pertaining to the adequacy and conclusions of the Draft EIR. The commenter hopes that these questions are answered and that conclusions are adjusted.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not identify specific questions left unanswered from the environmental review committee hearing, nor does it raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I8-3** The commenter suggests that the width of the proposed bike route should be no wider than 8 feet, with the exceptions of switchbacks. The commenter explains potential benefits associated with limiting the proposed trail width to 8 feet.
- The City acknowledges the comment and notes that it raises issues, including economic issues, that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- I8-4** The commenter states that no existing, functional pipes are present at certain locations depicted in the Draft EIR, based on photographs shown in comment I8-6. The drainage pipes referenced in this comment are represented as drains #2, #4, and #5 in Illustration 6 of the Draft EIR.
- The City notes that the comment provides background information relative to the existing condition of drainage structures identified in the EIR. The project description indicates that existing drainage structures would be repaired/replaced, and three new drainage outlets would be developed under the proposed project. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required or provided.
- I8-5** The commenter states that they will provide additional comments during the public review period. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I8-6** The commenter provides illustrations of current conditions of the existing drain pipes on site compared to excerpts taken from the Draft EIR. Please refer to response I8-4, above. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

Good afternoon Nick,

I hope this email finds you well. I have recently joined the paragliding community here in Santa Barbara but have been enjoying outdoor recreation up here my entire life. As a cyclist and someone that loves to ride the route from Santa Barbara down to Ventura, I was excited to hear of a route that would keep me off the freeway. I greatly appreciate all the work that has gone in to planning this bike route, but I would love to see some small changes. I am also someone who has dreamed of paragliding off Bates since I first saw some pilots there 5 years ago when officially moving to Santa Barbara. It was not until taking up the sport myself that I realized how important air flow is to the sport of flying. Without the right air flow, it is either unsafe or impossible to stay up in the air. I hope that the new bike path being constructed can keep both of my hobbies safe and possible in the future.

I9-1

I9-2

I did sign the petition that was created with approximately 2000 signatures, but I wanted to do more in reaching out to you. I loved that ten environmental review committee recommended the alternate 4 route that would build a bike path on the North side of bates. Coastal soaring at bates makes Carpinteria truly special and unique and should not be lost due to this bike route. I appreciate the cities consideration in reaching out to the soaring community to truly understand the impact that this bike route could potentially create. I look forward to a bike route that is safe for bikers as well as the soaring community.

I9-3

I9-4

Thank you for your time and consideration,

Laura Davalos, PT, DPT
ldavalos@sbch.org
 805-569-8900 ext. 82238

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Response to Comment Letter I9

Laura Davalos

April 19, 2021

- I9-1** The commenter provides personal background and introductory remarks regarding the proposed project. The City acknowledges the comment as an introduction to comments that follow. No further response is required.
- I9-2** The commenter expresses the importance of airflow in paragliding and expresses hope that implementation of the proposed project would not hinder both bicycling and paragliding.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I9-3** The commenter expresses support for Alternative 4. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I9-4** The City acknowledges the comment and notes that it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required or provided.

It still very much disturbs my self and others in our small group of houses. That the EIR, still does not have the monarch butterfly habitat that is here and across the freeway in the Eucalyptus trees. It doesn't have the migratory bird act. The sea birds fly up an down our coast multiple times a week! It doesn't even have a true Wind report on it! As a life time pilot (Private,military, commercial) The wind report is 100% wrong! WE have a perfect wind shadow. Created by the Current bluff/cliff face. Think of putting a 800-1000' horse shoe over the freeway and our homes!

I10-1

You will DESTROY it. Creating a Extremely large Coriolis spin to the air that will come straight off the back of the 45° bluff, across the freeway 2 times! Right through our homes. Potentially even causing car accidents as cars swerve vack an forth passing thru it!

I10-2

The monarchs are in the eucalyptus trees on the East Side of the freeway there as well as within our multi million dollar homes each year. Harbored here all Winter throught our trees! That will be highly affected by your committee's ignorance.

The migratory bird act, that all fly up-and-down the current cliff face bi to Tri weekly from the Carpinteria salt Marsh. to the Ventura salt marsh all of these are going to be affected drastically!

The endangered species of plant life on the front of that cliff face isn't even being considered. I ask you, How is this possible under federal law? How is this no concern to your environmental impact report?

I10-3

How is this Committee Bypassing FEDERAL LAW? How are you ignoring a nearly endangered Species monarch butterflies? The TOUGHEST migratory bird acts known throughout the USA? Based here in CA?

Endangered plant life Species that are growing on the front of that Cliff/Hill since the old highway was there. They have been there for decades one of very few areas they actually grow in our whole state.

I10-4

Turning a blind eye, to these things, will get you nowhere. Once you start you're gonna have to replace it all. Costing you hundreds of millions of dollars. For the 6 million dollars a year that you are all after.

I10-5

To top it off this trail is not of Ada compliance. Simply because it is Ada compliant from highway 150 down to the park it does not meet Ada compliance down through the parking lot! Or to connect to the other trail that goes Behind our homes!. That is also not Ada compliant coming out of the parking lot. This trail is a True FAILURE on Both ends!!! It is going to cost the city Millions of dollars in the end.

I10-6

The Air flow report IS Not one done in that area. It does not even correspond to the project. OUR MILLION Dollar homes are going to be SEVERELY AFFECTED! Once this hill is CUT away at such a slope. The perfect Wind Shadow that is built by Nature and the Current slope. SHIELDS our Homes from MOST of the 40-50MPH winds post frontal with each storm. Allowing the Monarchs to be here throughout the winter protected in all of our trees.

I10-7

A true Fallacy, is being pushed in search of exactly what? FAILURE?

Trail 4 is the only proposal that virtually eliminates all the Above!! Yet still not compliant down through the parking lot.

I10-8

I10-9

A State ruling that is not in compliance with Regulations and FEDERAL LAW!~! How is your one little rule book ignoring all the Above?!

I10-10

I truly question this boards actions. That will not meet the objectives! Or finances

Response to Comment Letter I10

E. Arciniega
April 20, 2021

- I10-1** The commenter expresses concern regarding the presence of monarch butterfly habitat and the neglect of requirements under the Migratory Bird Treaty Act.
- See response I2-1, above.
- I10-2** The commenter states that no wind report was included; states that the wind report is incorrect; and expresses concern regarding impacts to freeways, homes, and car accidents associated with wind.
- See response to I3-2, above. In addition, please refer to Global Response GR1, Air Flow Analysis.
- I10-3** The commenter expresses concern regarding the presence of monarch butterfly habitat, stated in the comment letter to be present in eucalyptus trees on the East Side of the freeway; the Migratory Bird Treaty Act; and endangered plant species. The commenter believes that the project does not comply with federal law regarding monarch butterflies and the Migratory Bird Treaty Act.
- See response I2-1, above.
- I10-4** The commenter expresses concern regarding endangered plant species.
- See response I2-2, above.
- I10-5** The commenter expresses general opposition to the project and economic concerns. The comment does not pertain to the adequacy of the EIR. No response is required.
- I10-6** The commenter expresses concern that the proposed trail is not compliant with the ADA and expresses economic concerns associated with the project.
- See response I5-6, above.
- I10-7** The commenter expresses concern regarding the Airflow Analysis provided as part of the Draft EIR and states that this Airflow Analysis does not correspond to the project. In addition, the comment expresses economic concerns associated with proposed cut slopes, and concerns regarding the monarch butterfly.
- Please refer to Global Response GR1, Air Flow Analysis; Global Response GR2, Landform Modification; and response I2-1 regarding monarch butterfly impacts.
- I10-8** The commenter expresses general opposition to the project. The City acknowledges the comment and notes that it expresses opposition to the proposed project, but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I10-9** The commenter expresses support for Alternative 4, but states that Alternative 4 is still not ADA-compliant through the parking lot.

The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. Regarding ADA compliance, see response I5-6, above. Alternative 4 would not route any portion of the trail through the Rincon Beach County Park parking lot, instead aligning the path along the northern side of the parking lot, and achieving a trail slope that is ADA compliant. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

I10-10 The commenter states that the project is not in compliance with federal law and states that the project will not meet objectives or finances.

The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Regarding the commenter's previous concerns associated with compliance with federal law regarding monarch butterflies and the Migratory Bird Treaty Act, please see response I2-1, above. No further response is required.

Nick Bobroff

April 21, 2021

Principal Planner

Community Development Department

City of Carpinteria 5775 Carpinteria Ave. Carpinteria, CA 93013

Hello Mr. Bobroff and readers of this letter,

This is my second reply to the Zoom webinar meeting on April 13, 2021 of the Environmental Review Committee. The presentation summary by Dudek and Bengal Engineering seemed to exclude completed construction details and their costs. Is the completion of "earth work," and a concrete reinforced bridge buttress, on the terrace, almost level, to the Southbound US 101, near the eastern edge of the King property (see attachments 1, 1a,), included, in the estimated two-year construction window? What were the costs and under what guidelines and environmental usage parameters were used?

I11-1

We have been shown grey scale illustrations, yellow and magenta line drawings and sandy scale drawings of the proposed sections of the Multi Use Trail, that start from highway 150 and terminate in the County parking lot (see attachments 2.1, 2.2, 2.3). What does the complete M.U.T., with support bracing, drain pipes, landscaping, bridge size, safety fencing, look like? How much will it cost? What are the costs, to date? With California Department of Transportation employees, taking a ten percent, salary cut, is it prudent to continue? Can traffic barriers, be placed on the existing Southbound US 101 bridge, on and off ramps at highway 150 and Bates Road, to protect bicyclists? Will the Southbound US 101 traffic off ramp at Bates Road be realigned, to the North, to allow more space, for bicyclists?

I11-2

Committee member Lohaus pointed out that a small portion of the M.U.T., at Little Diamondhead, will not have a Pacific Ocean view with Alternative #4. How will this be different, from the lack of a Pacific Ocean view, on the north side of the King property? The Pacific Ocean is clearly visible for the 10-mile stretch of the existing bike path into Ventura.

I11-3

The summary presentation, included a statement that there would be, "...no significant impact on soaring activities..." I would like to submit the link, to the Santa Barbara Soaring Association's, Aaron LaPlante's video, "Preserving Free Flight at Bates Bluff (see attachment video link)." I described in the Zoom meeting, that it is the deflection, of the prevailing South west wind, that generates lift and the lift band, that we paragliders and hang gliders, fly in. Little Diamondhead, for free flight, is like Cape Canaveral for powered rocket and Shuttle launches. There was a perception, that only "wind speed," which would not be affected, was the only factor, in considering, free flight opportunities at Little Diamondhead. Wind velocity is a factor, for paraglider and hang glider pilots, but not the only one for ridge soaring. There would be an almost 95% reduction, in ridge soaring opportunities, if Little Diamondhead is destroyed, and a reconfigured land mass, with; support structures, drain pipes, lower angle of inclination, and a elevated man- made pathway (with unsightly safety fencing), were to be built.

I11-4

I will submit additional comments and questions and attachments, during the public comment window to do so.

I11-5

April 21, 2021

Respectfully,

Ottis Gillespie 4/21/2021

Ottis Gillespie

Oxnard, CA 93036

Aaron Laplante's Santa Barbara Soaring Association, video link to "Preserving Free Flight at Bates Bluff."

<https://youtu.be/SVIdEfWHMpE>

1



I11-6



I11-6
Cont.

2.1



SOURCE: Bengal Engineering

Illustration 4 Representative Steel Framed Bikepath Bridge

The approximate location of the Carpinteria Rincon Trail bridge over the UPRR alignment (the magenta colored line) is shown in Illustration 5, below. The relative elevation of the bridge can be compared to the US Highway 101 bridge over the UPRR corridor (just above the elevation of the pictured train).



SOURCE: Bengal Engineering

Illustration 5 Approximate Profile and Location for Rincon Trail Bridge

Drainage

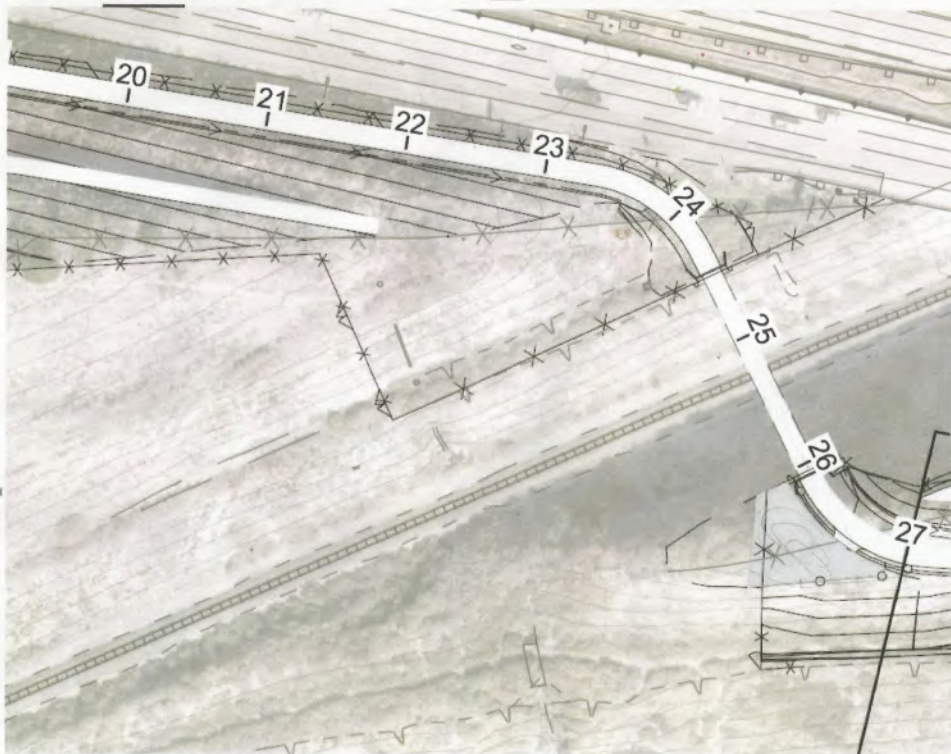
The proposed trail project includes an integrated storm drainage system to ensure storm water run-off from the recontoured bluff face and the trail surface is conveyed to the ocean efficiently, avoiding potential erosion of slopes along the trail alignment. Along the portion of the trail north of the UPRR alignment, a concrete swale (v-ditch) would convey water along the trail edge, where it would be released into an existing surface drainage swale now serving US Highway 101. This swale connects to an existing storm drain that crosses underneath the UPRR alignment, and then descends to the beach level. This storm drain is labelled as "1" in illustration 6. No improvements are proposed to storm drain 1, and the trail storm drain volumes contributed to this storm drain would be negligible compared to existing flows already contributed from portions of US Highway 101.



SOURCE: Bengal Engineering

Illustration 6 Major Storm Drainage Components of the Project

On the south side of the UPRR alignment, a concrete drainage swale would also carry surface run off from the recontoured bluff face and trail, conveying such drainage along the side of the trail until it reaches one of the storm drain inlets lower in elevation. A total of 5 vertical storm drains would convey this storm water from the trail to the beach elevation, for the trail segment south of the UPRR alignment (refer to Illustration 6). Drains #3 and #6 (shown in light blue in illustration 6) are existing and would be re-used, including rehabilitation of existing piping; drains #2, #4, and #5 (shown in magenta in illustration 6) would be newly developed for the project.



2.3

I11-6
Cont.

Response to Comment Letter I11

Ottis Gillespie
April 21, 2021

I11-1 The commenter states that the April 13, 2021 presentation omitted details regarding construction and costs. The commenter asks if various components associated with construction of the project would occur within the two-year construction window.

Regarding the construction window, as stated in Section 3.2.4, it was assumed that construction would commence in March 2022¹ and would be completed by approximately March 2024. This construction schedule includes site preparation (2 months); grading (11 months); trail construction (5 months); bridge construction (1 month); paving (2 months); and architectural Coating (1 month). Regarding the commenter's economic concerns, the City acknowledges the comment and notes that it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

I11-2 The comment pertains to Illustrations 4, 5, and 6 of the Draft EIR, which have been included in this letter (see comments I11-6). The commenter asks what the complete proposed trail would look like and expresses economic concerns regarding the proposed project. The commenter suggests implementation of traffic barriers to protect cyclists and asks if the Southbound U.S. 101 off ramp would be realigned to account for the proposed project.

Visual simulations of the proposed project have been included as Figure 3.1-2 of the Draft EIR. Regarding the commenter's economic concerns, the City acknowledges the comment and notes that it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The City also acknowledges and appreciates the commenter's suggestions regarding traffic barriers and notes there are no plans for realignment of the Southbound U.S. 101 off ramp at this time. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

I11-3 The comment expresses concern regarding lack of an ocean view associated with a portion of Alternative 4.

The City acknowledges that a portion of the trail proposed under Alternative 4 would not have an ocean view. Although it could affect Alternative 4's ability to meet all or most project objectives, this does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

I11-4 The comment expresses concern regarding the loss of wind and velocity associated with the proposed project.

¹ The analysis assumes a construction start date of March 2022, which represents the earliest date construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

See Global Response GR1, Air Flow Analysis.

I11-5 The commenter states that they will provide additional comments during the public review period. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

I11-6 The comment provides illustrations of several existing benches used informally as a pedestrian path and excerpts of the Draft EIR. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required or provided.

Hello Nick, having just heard the good news, I just wanted to extend my heartfelt thanks to you and the environmental review committee for choosing the bike path extension alternative which allows both paragliding the Little Diamondhead bluff and biking or walking on the bike path to coexist, a very wise choice indeed. Many thanks to you all.

I12-1

Sent from my iPad

Response to Comment Letter I12

Desmond
April 23, 2021

I12-1

The commenter expresses support for Alternative 4 and would like to thank the City for choosing this alternative. As a clarification, the Environmental Review Committee voted to recommend approval of the EIR to the Planning Commission with revisions, and expressed a preference for Alternative 4. This vote by the ERC does not constitute a decision for the City to move forward on approval of the project or any of the alternatives in the EIR. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. It should be noted that the City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

Hi Nick,

Writing again to let you know I fully agree with the Environmental Review Committee's decision to recommend Alternate 4, building on the North side of Bates ridge, preserving the soaring recreation. We'd be thrilled to see the city also support this compromise solution.

I13-1

Thank you!

--

Caleb

On Wed, Nov 25, 2020, 3:25 PM Caleb Phillips <cphillips@smallwhitecube.com> wrote:

Hi Nick,

I live in Colorado but visit Santa Barbara to paraglide. It's where I learned, and is one of the best places for the sport in the country. The Bates beach ridge is a world class location for ridge soaring. A bike path is a great addition to the area and would be enjoyed by many, but there certainly must be a way to add a bike path and save this renowned free flying site? Appreciate your consideration and thanks for receiving input from the community.

I13-2

Cheers,

Caleb Phillips

Response to Comment Letter I13

Caleb Phillips
April 23, 2021

I13-1

The commenter expresses support for Alternative 4 and would like to thank the City for choosing this alternative. As a clarification, the Environmental Review Committee voted to recommend approval of the EIR to the Planning Commission with revisions, and expressed a preference for Alternative 4. This vote by the ERC does not constitute a decision for the City to move forward on approval of the project or any of the alternatives in the EIR. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. It should be noted that the City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

Good morning Nick,

Mike Hilbreath here. I am an avid hang gliding pilot and have frequented the Bates flying site in the past. I have stayed local and spent money at the local restaurants and businesses. I feel that the Bates Flying Site could be preserved, and the cycling community could be served with proper design of the changes to the Bates Site. And, Carpinteria would retain a facility that brings in revenue to the city and the business people who live and work in Carpinteria.

I14-1

If you would like to discuss this subject more, I could be available at any time. Thank you Nick.

-

Best regards,
Michael

Response to Comment Letter I14

Michael Hilbreath

April 23, 2021

I14-1

The City acknowledges the comment and notes that it expresses general opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

Good morning,

I appreciate the work that the city is attempting to do to put in a new bike path. I realize that planning this is a lot of work and I appreciate the work on this to help bikers. However, I would like the city to follow the recommendation of the Environmental Review committee to use Alternate 4, building on the North side of Bates ridge, preserving the soaring recreation.

I15-1

Free flight is a very special sport that does not have a ton of locations where it can be done. Biking on the other hand can be done basically anywhere. Please do not destroy the coastal soaring site with the initial bike path route.

I15-2

Coastal soaring sites in California draw thousands of pilots from all over the globe who want to experience the magical costal soaring sites. It would be unwise to destroy this form of tourism and reduce the cash inflows to the city and reduce the business that soaring tourists bring.

Please follow the recommendation for Alternate 4 and preserve free flight soaring at Bates!

I15-3

Sincerely,
Brandon Stringham

Response to Comment Letter I15

Brandon Stringham

April 23, 2021

- I15-1** The commenter expresses appreciation to the City regarding planning a new bike path and expresses support for Alternative 4. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I15-2** The commenter expresses the importance of free flight and expresses general opposition towards the proposed project. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I15-3** The commenter expresses support for Alternative 4. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

Dear Nick,

The draft EIR for the Rincon Trail Project dismisses the significant impact of the project on recreation. Pilots leave no trace and have been using the ridge as-is for decades. The extensive earth moving on the south face of the bluff will significantly change wind flow and cancel flying.

I 116-1

Rather than reach out to any local pilots, the City of Carpinteria paid for a wind study that estimates a maximum 30% reduction in velocity - and then asserts that 30% is insignificant. That magnitude of change is quite significant to those who use the ridge for soaring.

I 116-2

The City is brushing aside pilots to muscle through a project involving soil removal, concrete and chain link fences, all to maintain an ocean view for cyclists for a mere few tenths of a mile. The draft EIR downplays the blight this will create for millions of motorists.

I 116-3

A bike path on the north side of Bates bluff would safely link the bike paths and preserve free flight. I agree with the Environmental Review Committee's decision to recommend Alternative 4.

I 116-4

It seems a big waste of taxpayer funds to try and prop up a lot more concrete on the south facing side of the Bates bluff, and downright unnecessary to destroy a coastal soaring site.

I 116-5

Coastal soaring at Bates makes Carpinteria truly special and unique. I'm writing to express hopes for a compromise on an ocean view for the short stretch of the bike path extending along Bates bluff, and for the City to proceed with Alternative 4.

I 116-6

Thank you for your time and consideration.

Sincerely,

Jamie Bishop, Santa Barbara Soaring Association member, Santa Barbara resident, and cyclist

Response to Comment Letter I16

Jamie Bishop
April 23, 2021

- I16-1** The commenter states that the Draft EIR dismisses significant impacts to recreation resulting from wind flow. The proposed project's impacts to recreation, associated with wind flow, have been analyzed in Section 3.11. As discussed in this section, impacts to recreation would be less than significant. In addition, see Global Response GR1.
- I16-2** The commenter states that the maximum 30 percent reduction in velocity is significant to soaring. See Global Response GR1.
- I16-3** The comment expresses general opposition towards the proposed project. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I16-4** The commenter expresses support for Alternative 4. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I16-5** The comment expresses concern regarding tax-payer funds to be expended on construction and maintenance associated with the proposed project. The City acknowledges the comment and notes that it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. No further response is required or provided.
- I16-6** The commenter expresses support for Alternative 4. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

Dear Nick, et.al.,

Thank you for your detailed study and continued planning of the bike path reroute along Bates Ridge. I am a long time hang-glider pilot and recently signed the petition to maintain Bates Ridge in a manner to preserve the hang-gliding activities that have been enjoyed there for decades. I hope you appreciate the special place this is, and support it's preservation.

Hang-gliding is suffering a loss of flying sites all over the country.

Mainly this is due to development around the sites and the associated loss of landing zones and access to launches. In some situations, it is a result of changing geography and impact to wind conditions. Please help preserve the few remaining sites. This is true for special sites like Bates Ridge.

Thank you,
Wayne Michelsen
USHPA pilot #72939

I17-1

Response to Comment Letter I17

Wayne Michelsen

April 23, 2021

- I17-1** The comment expresses general opposition towards the proposed project. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

I am a paraglider pilot who lives in Los Angeles (Woodland Hills, to be exact). I have been coming up to Bates to fly for twenty years. I appreciate your hard work on improving this area for cyclists, as I am also a cyclist who rides here. I would absolutely prefer to use a bike path on the north side of Bates bluff (Alternate 4), as recommended by the Environmental Review Committee. I believe this will best serve everyone's needs.

I18-1

Sincerely,
Randall McCormick

Response to Comment Letter I18

Randall McCormick

April 23, 2021

I18-1

The commenter expresses support for Alternative 4. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

The new bike trail will be great, but it needs to be alternative number 4 please. The completely inaccurate assessment of what will occur with airflow, and dismissal of our recreational flying use of that sight will forever negatively impact our flying future there. Please consider us, the flying community. We have a huge stake in this. And please reconsider which plan you move forward with, and choose an alternative which does not destroy our flight park.

I19-1

Thank you for your consideration.

Mike Harrington
Activities Director
SBSA

Mike Harrington
mikestoneyard@gmail.com
Cell 805-452-6162
Store 805-962-9511
Fax 805-962-7290

Response to Comment Letter I19

Mike Harrington
April 23, 2021

I19-1 The commenter expresses support for Alternative 4 and also provides the opinion that the air flow analysis is completely inaccurate.

The City acknowledges the commenter's preference for Alternative 4; the City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided. With regard to the comment on accuracy of the air flow analysis, please refer to global response GR1.

Hello thank you for taking the time to consider with care your impactful work plans. I signed a petition to preserve Bates Ridge that has over 2,000 signatures and 60 comments.

I20-1

It's actually an important matter to get right for our future. The communities can complement each other .

I fully agree with the Environmental Review Committee's decision to recommend Alternate 4, building on the North side of Bates ridge, preserving the soaring recreation.

I20-2

I don't understand why the City is planning alienate the soaring community.

It seems like the EIR draft authors refuse to listen to the pilots who have been recreating at Bates for over 40 years.

Coastal soaring at Bates makes Carpinteria truly special and unique, don't diminish that.

I20-3

Let's build a better path. I believe building a bike path on the North side of Bates bluff is best for all recreational users, it is a safer, more direct path for cyclists.

I20-4

It also keeps picketing protests off your news cycle.

Please be reasonable.

Save Bates!

Adam Zerkel

[\(213\)924-4693](tel:(213)924-4693)

Response to Comment Letter I20

Adam Zerkel
April 23, 2021

- I20-1** The commenter thanks the City for consideration of the commenters' petitions.
- The City acknowledges the comment as an introduction to comments that follow. No further response is required.
- I20-2** The commenter expresses support for Alternative 4. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I20-3** The commenter states that the City is alienating the soaring community by not giving consideration to statements about the history of soaring at the site.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The recreation section of the Draft EIR (3.11) describes existing soaring activities above the project alignment, including an indication that these soaring activities have occurred over a substantial time span. No further response is required or provided.
- I20-4** The commenter expresses support for Alternative 4. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

Hello again Nick,

Just saw this on youtube. Hard to "imagine," that this route, with a Pacific Ocean View exists.

https://youtu.be/s_bm_VFaPfM

Incredible!

Ottis Gillespie

I21-1

Response to Comment Letter I21

Ottis Gillespie
April 23, 2021

- I21-1** The commenter provides a link to a video. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

Hello Nick!

I am one of the people who is concerned about the development the city of Carpinteria is planning for the Bates Bluff area. I wanted to reiterate my support for preserving this area and moving the proposed bike path out closer to the highway. Below are some of my thoughts and concerns on this topic.

I22-1

- I appreciate the work that has gone into planning this bike trail, but I want to see it improved.
- I am devastated that the Draft EIR considers the impact to my flying recreation to be 'insignificant'.
- I signed a petition to preserve Bates Ridge that now has 2,000 signatures and over 60 comments.
- I fully agree with the Environmental Review Committee's decision to recommend Alternate 4, building on the North side of Bates ridge, preserving the soaring recreation.
- I believe building a bike path on the North side of Bates Bluff is best for all recreational users, as it is a safer, more direct path for cyclists, giving them a path that avoids the crowded, steep, and dangerous Rincon parking lot.
- I am a cyclist and want a direct route on the North side, rather than an Ocean view. Seeing the Ocean shouldn't be a requirement for this project because I get plenty of views along the whole bike path to Ventura.
- You are concerned the current plan will require maintenance against rising seas as it is being built near an eroding seawall. Relocating to the other side of the ridge is financially responsible given this concern.
- I appreciate the wind study done by the engineers, however this study specifically states that it is based on theory and not intended for this purpose. Even if accurate, 20-30% loss of lift is very significant to me, especially on average wind days where lighter wind flow will be exponentially impacted by this project.
- I feel its inappropriate for the EIR to discuss free flight rules or launches, as this is outside the scope of the document and project. The focus of the EIR and CEQA is preserving recreation at the project site.
- I don't understand why the City continues to brush me aside and has failed to reach out to the soaring community. There are inaccurate statements in the Draft EIR because the authors refuse to listen to the pilots who have been recreating at Bates for over 40 years. Let's build a better path together.
- Coastal soaring at Bates makes Carpinteria truly special and unique. I can bike almost anywhere, but I travel to Carp for the flying at Bates and spend my money there. I have spent money in Carpinteria restaurants, coffee shops, grocery stores, and motels, due to the flying there.

I22-2

I22-3

I22-4

I22-5

I22-6

I22-7

I22-8

I22-9

I22-10

Many thanks for your favorable consideration on this issue!

Regards,

Robin Cushman

Response to Comment Letter I22

Robin Cushman

April 24, 2021

- I22-1** The City acknowledges the comment and notes that it expresses opposition to the proposed project and support for Alternative 4. The comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I22-2** The comment expresses concern that impacts to recreation associated with the proposed project were determined to be insignificant in the Draft EIR.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I22-3** The comment references the petition to preserve Bates Ridge.
- The City acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I22-4** The City acknowledges the comment and notes that it expresses support for Alternative 4. The comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I22-5** The commenter states that an ocean view should not be a requirement for the project and provides support for Alternative 4. The comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I22-6** The commenter expresses concern regarding the impacts rising sea level and erosion would have on the proposed project and states that Alternative 4 is more financially responsible.
- The sea level rise comment is acknowledged; the hydrology section of the Draft EIR (3.8) discusses impacts associated with potential sea level rise, while the Alternatives Section (6.0) addresses such impacts for each of the identified project alternatives. Regarding the commenter's economic concerns, the City acknowledges the comment and notes that it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. No further response is required or provided.
- I22-7** The commenter expresses concern regarding 20-30 percent loss of wind and states that this is significant.
- See Global Response GR1.

- I22-8** The commenter feels that it is inappropriate for the EIR to discuss flight rules or launches, and states the focus of the EIR should be to preserve recreation.
- See Global Response GR1.
- I22-9** The commenter states that the City has failed to reach out to the soaring community, resulting in inaccurate statements in the Draft EIR.
- The City acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The City has received a number of comments from the soaring community on the project's Notice of Preparation and has accounted for these comments in the preparation of the Draft EIR. Therefore, no further response is required or provided.
- I22-10** The commenter explains the uniqueness of the project site with respect to existing soaring opportunities afforded above the project trail alignment.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

Dear Nick,

I appreciate the work that has gone into planning this bike trail, but want to see it improved and am in shock how the flying community is being ignored during this process. I travel from Fresno to fly this site and spend money in YOUR community.

I23-1

If flying becomes interrupted or impeded, I will choose to fly somewhere else, thus taking my money I spend in your area elsewhere.

The wind study specifically states that it is based on theory and not intended for this purpose. Even if accurate, 20-30% loss of lift is very significant, especially on average wind days where lighter wind flow will be exponentially impacted by this project.

I23-2

I don't understand why the City continues to brush me aside and has failed to reach out to the soaring community. There are inaccurate statements in the Draft EIR because the authors refuse to listen to the pilots who have been recreating at Bates for over 40 years. Let's build a better path together.

I23-3

Coastal soaring at Bates makes Carpinteria truly special and unique, I can bike almost anywhere, but I travel to Carp for the flying at Bates and spend my money there.

I23-4

Please consider this in your decision making process.

Ryan Soares
E.D.G.E. Challenge Course Director
Department of Recreation Administration
California State University, Fresno
5310 North Campus Drive m/s PH103
Fresno, CA 93740-8019

Phone: [559-301-6356](tel:559-301-6356)

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Web site and Video: <http://www.fresnostate.edu/chhs/recreation/about/edge/index.html>

Facebook: www.facebook.com/fresnostaterecadmin

Response to Comment Letter I23

Ryan Soares
April 24, 2021

- I23-1** The commenter expresses appreciation to the City regarding planning a new bike path; states they would like to see improvements; expresses concerns regarding involvement of the soaring community; and states they will not spend their money in the City if the project were to be approved.
- The City acknowledges the comment as an introduction to comments that follow. Regarding economic concerns, the City acknowledges the comment and notes that it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. Regarding involvement of the soaring community, the City has received a number of comments from the soaring community on the project's Notice of Preparation and has accounted for these comments in the preparation of the Draft EIR. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I23-2** The commenter expresses concern regarding 20-30 percent loss of wind and states that this is significant.
- See Global Response GR1.
- I23-3** The commenter states that the City has failed to reach out to the soaring community, resulting in inaccurate statements in the Draft EIR. The City acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The City has received a number of comments from the soaring community on the project's Notice of Preparation and has accounted for these comments in the preparation of the Draft EIR. Therefore, no further response is required or provided.
- I23-4** The commenter explains the uniqueness of the project site with respect to existing soaring opportunities afforded above the project alignment.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

This email contains my overall comments regarding the Carpinteria Rincon Trail Project Draft EIR of March, 2021 and are provided subsequently to the Carpinteria Environmental Review Committee (ERC) meeting of April 13, 2021.

I24-1

As a Carpinteria resident, bluffs user, active cyclist, and inactive paraglide pilot, I support the ERC's recommendation of Alternative Four as the preferred trail alternative. It has the least impact to recreational soaring, eliminates massive beachside earthworks, eliminates installation of beachside storm drainage and piping, and removes the resultant permanent visual impacts of such to views of the area from viewpoints near the Harbor Seal Sanctuary RR crossing and the Seal Sanctuary overlook, and eliminates potential bicycle/pedestrian/vehicle conflicts in the Rincon County Park parking lot by routing cyclists directly to Bates Rd. It also provides additional security to the park in terms of eliminating access and resulting potential vandalism from direct after-hours bike-to-park trail access. In terms of lifecycle costs, it is likely that the cost of maintaining the cycling trail within the 101 corridor would be much less than maintaining the trail along the southern beachside bluffs exposed to wind and rainstorm erosion.

I24-2

I do understand that the primary purpose of the original Alternative 2 and the modified "less cut/fill" Alternative 2 was to provide "...a sweeping view of the ocean, beach, and Channel Islands", and that cycling within the Highway 101 Corridor would not be nearly as pleasant and not much of an "Instagram" photo op except from the bridge crossing. It is, however, a relatively short section of highway-adjacent trail on a longer trail that to the East/South runs almost entirely along the ocean to Ventura. Views are still available from the Rincon Bluffs, and of course from Rincon Beach Park for those cyclists who care to stop to seek them out.

I24-3

While it is unfortunate that the Santa Barbara Soaring Association and local pilots were not initially contacted and consulted in the preparation of the EIR, I think that their concerns have been heard and the City now has a better understanding of the impacts of modification of the bluffs having the real potential to eliminate this recreational soaring site that is regarded as a jewel of flying along the California coast. I am personally aware of this site's reputation in the soaring community and have met many pilots at the launch site who have come specifically to Carpinteria and this site to practice their skills and learn from and enjoy the company of experienced local pilots who provide encouragement and support to the soaring community and openly answer questions from curious visitors.

I24-4

One small concern that will have to be addressed with Alternative Four is that there will be a strong desire for people to develop an informal short-cut trail from either end of the bridge down

I24-5

to the existing RR/ocean cutbank bluff trail. Both pedestrians and more fearless mountain bikers will likely want to use that short-cut to access the Rincon Beach parking lot and facilities. The trail near the bridge will need to be designed and built to dissuade that behavior.

↑ I24-5
Cont.

Alternative Four has some great potential for creative, inviting design that would mitigate the 101 corridor downsides. Even without the direct ocean and beach views on this particular trail segment, it is still a wonderful addition to the area and the coastal bike path. Kudos to the City of Carpinteria for bringing the vision of the trail to a reality while threading the needle in this complex multi-faceted project.

↑ I24-6

/s/ Jon Lewis, Carpinteria CA

Response to Comment Letter I24

Jon Lewis

April 24, 2021

- I24-1** The City acknowledges the comment as an introduction to comments that follow. No further response is required.
- I24-2** The comment provides support for Alternative 4. The comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I24-3** The comment provides an overview of Alternative 2 and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I24-4** The commenter states that the soaring community was not initially contacted but states they believe the City has heard the soaring community's concerns. The comment also provides background on the project site, as it relates to soaring activities.
- The City has received a number of comments from the soaring community on the project's Notice of Preparation and has accounted for these comments in the preparation of the Draft EIR. The City acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I24-5** The commenter states that, with implementation of Alternative 4, people will want to develop informal shortcuts and suggests the trail is designed to dissuade that behavior.
- The City appreciates the commenter's recommendations. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- I24-6** The commenter expresses support for Alternative 4. The comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

Dear Mr. Bobroff:

Is it true the City is working to override the decision of the Environmental Review Committee's decision regarding Bates?

I 125-1

I fully agree with the ERC's decision to recommend alternate 4, building on the north side of Bates Ridge, preserving the soaring recreation.

I 125-2

It's outside the scope of the EIR to discuss free flight rules or launches. Shouldn't the focus be preserving recreation at the project site?

I 125-3

Bates makes Carpinteria unique because of coastal soaring. I can bike anywhere.

I 125-4

Sincerely,
Betty Winholtz

Response to Comment Letter I25

Betty Winholtz

April 24, 2021

- I25-1** The commenter asks if the City is working to override the decision of the Environmental Review Committee regarding Bates.
- The commenter is seeking verification of whether the City Planning Department will follow the recommendation of the ERC to implement Alternative 4 for approval of the Rincon Trail project. The City acknowledges receipt of the comment; the City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I25-2** The commenter expresses support for Alternative 4. The comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I25-3** The commenter feels that it is inappropriate for the EIR to discuss flight rules or launches, and states the focus of the EIR should be to preserve recreation.
- See global response GR1.
- I25-4** The commenter explains the uniqueness of the project site with respect to the existing soaring opportunities it affords.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

Greetings,

Firstly; thank you for the fantastic work you've been doing to build infrastructure for our communities. We know it's never straightforward. I'm reaching out to suggest strong reconsideration by touching on a couple of points regarding the Bates bike path project.

My name is Riebeeck van Niekerk and I'm a relatively new paragliding pilot. I've spent time going through some of the public information and EIR briefly covered by DUDEK and the engineering teams overseeing the development work for the Bates bike path.

My ultimate input on the matter echoes much of what you are probably hearing from the rest of the Flying community. Please consider the following points below:

1. **Significance of Impact:** I am a mechanical engineer by trade and from the pure perspective being both a cyclist and a pilot; I see quite a few shortcomings with the primary design option/options presented over zoom a couple weeks ago. Alternative 4 should be given the priority OR another alternative should be engineered to ensure no impact is had on recreational flying in the area. A designation of **'no significant impact'** as far as recreational activities are concerned stems from the lack of engagement with the flying community and from either a lack of insufficient design, engineering, or worse, both.
2. **Lift Technicals** - From a technical standpoint I have serious reservations about the reported average "20-30% change in wind speed" as well as the reported loss of lift/wind speed/venturi effect based on changing slope gradient. **I would like to see the CFD models used to report those average changes in wind speed. I would like to request plan/side/front/geometric projections for vector distribution plots of wind speed for varying wind direction (60 deg to 290 deg would be sufficient if you don't have a full 360 CFD/EFA study) and wind velocity for all design alternatives.**
 - o If a full **CFD/EFA** analysis of the terrain was not conducted, **I would strongly advise** this be done before any considerations are made.
 - o Even if that reported average value is accurate; how was the determination made that this has 'no significant effect'?
 - o Wind velocity has a squared (quadratic) relationship to drag force which ultimately holds a relationship to lift and therefore **a small change in wind velocity has a significant impact on lift.** The point here is that if; 20-30% reduction is being reported, this will have a massive/significant/noticeable impact on lift and our ability to practice our sport and draw in eco/adventure tourism dollars (discussed more in point 4 below).
3. **Cyclist Sentiment** - We have surveyed over 100 cyclists who travel through the area regularly somewhere around 2%-3% responded with a desire to have an ocean view on that stretch. The rest just want a direct route - there's plenty of ocean views on the majority of the other sections.

I26-1

I26-2

I26-3

I26-4

- 4. **Tourism and Economics** - from a pure travel and tourism perspective; there's a huge international community of pilots who specifically travel to this area each year to specifically paraglide at bates and other areas around the Ventura/Santa Barbara area. | 126-5
- 5. **Flying Community** - I'm surprised that in a first world country we still have to point this out but; **the engineering/development teams should be working together with the flying community to come up with a workable solution.** We stand ready to lean in to provide SME input on the matter but have yet to hear a word from anyone involved with development of this project. | 126-6
- 6. **Heritage** - We have few places to practice our sport and this is one that is world renowned for being a classic ridge soaring location. This project has the potential to seriously ruin this site for flying forever and it would be a national shame within our community and for our wider global community abroad. | 126-7

Again we understand the challenges and my main expectation is that these very real implications are properly considered; and efforts are made to reach out and work with the flying community to converge on a workable solution that will benefit everyone. | 126-8

Thank you for hearing me out and look forward to seeing where we can assist.

Kind Regards,
Riebeeck van Niekerk
+1.832.235.0531

Response to Comment Letter I26

Riebeeck van Niekerk

April 25, 2021

I26-1 The comment expresses appreciation to the City regarding planning a new bike path, provides an introduction for the comments to follow, and provides personal background on the commenter.

The City acknowledges the comment as an introduction to comments that follow. No further response is required.

I26-2 The commenter expresses support for Alternative 4 and states that the significance determination for recreational impacts stems from lack of engagement with the flying community and the lack of sufficient design, engineering, or both.

Regarding Alternative 4, the City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. Regarding recreational impacts, the City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise any specific issue related to the adequacy of any particular section or analysis of the Draft EIR. Therefore, no further response is required or provided.

I26-3 The commenter expresses concern regarding the 30 percent change in wind speed and requests computational fluid dynamics (CFD) models as well as plan/side/front/geometric projections for vector distribution plots of wind speed. Fluid dynamics is the study of the motion of fluids, usually in the presence of an object. Typical fluid flows of interest to engineers and scientist include flow in pipes, through engines, and around objects, such as buildings, automobiles, and airplanes. Computational fluid dynamics (CFD) is the study of these flows using a numerical approach. The commenter advises the preparation of a full CFD study. The commenter asks for clarification of why impacts to recreation were considered not significant and states that a small change in wind velocity would have a significant impact on lift.

See Global Response GR1. As described in the airflow analysis report, the analysis provided predictions based on existing data from field measurements of air flow over large-scale topographic features, from aerodynamic experiments conducted with scaled models in wind tunnels, from engineering standards for wind stress on buildings, and from published literature addressing wind flow over topography as related to soaring activities.

Through careful examination of this existing research, appropriate physically-based equations have been applied in order to predict the reduction in horizontal and vertical wind velocities from modification of the bluff face as proposed. The range in predicted wind velocity reduction represents the application of two modeling approaches, one using the mean slope angle across the entire slope face, and the other employing the mean slope angle for the upper portion of the slope. The EIR uses the greater predicted wind velocity reduction for the project and for Alternative 3, as the more conservative conclusion.

For context, Computational Fluid Dynamics (CFD) modeling is typically employed in engineering to address critical operational parameters during design development of equipment, systems and

structures. CFD provides results that are most reliable when examining flow over streamlined and smooth objects, such as an aircraft wing. CFD also requires numerous assumptions, including choices of computational grid size, boundary conditions, and turbulence modeling; to avoid erroneous conclusions, CFD requires careful validation against experimental measurement when applied to a new problem. Validation studies have shown that CFD of complex terrain can provide inaccurate predictions under some atmospheric conditions (see for example El Bahlouli et al. 2020). Relatively more reliable computational approaches (such as Large Eddy Simulation, LES) require vastly greater computational power, and are currently in the domain of research rather than commercial use (see Pirooz & Flay 2018). Due to the scale and complexity of the ocean bluffs along the project alignment, development of a CFD model to evaluate air flow conditions from project changes was not considered suitable or cost-effective.

In order to consider a worst-case scenario, the air flow analysis is based upon the grading plan cross-section of the bluff face with the greatest alteration from existing slope profile to project-resultant slope. The air flow analysis examines incoming horizontal wind that is perpendicular to the bluff crest. Although numerous effects are considered, it may be helpful to recap here the two main effects, namely: (1) amplification in wind magnitude as the flow is constrained to pass over the bluff (the “Venturi” mentioned by the question), and (2) the induction of a vertical wind component as the air must flow at an upward angle over the bluff.

Wind tunnel experiments and field measurements on bluffs have shown that, as long as the mean slope remains above approximately 30 degrees, the amplification in wind magnitude (combining both horizontal and vertical components) will not change significantly (see for example Bowen & Lindley 1977; Bowen 1980). However, the extent and location of the Venturi region, as well as the vertical component of the wind will of course change. The simplest estimate of the vertical velocity component is obtained by multiplying the wind magnitude by the sine of the bluff angle; this approach is used for example in the book on soaring by Pagen (1992), to compile his figure 139. More refined methods of estimation are described in the Air Flow Analysis report. (Luzzatto-Feliz, January 2021).

Reductions in the vertical wind speed associated with changes to the topography are expected to be maximal in the perpendicular wind scenario. This is due to the fact that, when the wind is at a yaw angle to the bluff crest, the bluff will deflect it further along the crosswind direction, implying that the flow that travels over the bluff will be reduced. This effect will decrease ridge lift, as shown by the wind tunnel experiments of Crawley & Schmanske (1994); for an illustration in the soaring literature, see p. 336 of Pagen (2001).

Gentler slopes induce a smaller crossflow deflection, and therefore produce a smaller decrease in ridge lift through this crossflow mechanism (this is also illustrated in fig. 142 of Pagen 1992). Percentage differences between the vertical wind velocities associated with the existing versus proposed bluff profiles would therefore also be smaller than for the analyzed condition with wind perpendicular to the bluff face. Finally, it should be noted that lift for aircraft results from the horizontal wind speed flowing over the wing (or the sail), and that horizontal wind speed over the bluff top is not anticipated to be altered by the proposed regrading. Consequently, horizontal wind conditions that support launching of hang-gliders and para-gliders adjacent to the project alignment would not be affected by the project.

The wind flow analysis and EIR discussion include no attempts to estimate future climatic conditions, including localized wind patterns that could influence the number of days on an annual basis when air flow conditions above the property would support soaring activities, for either the existing bluff profile or those resultant from the proposed project or Alternative 3.

I26-4 The commenter presents the results of a survey stating that cyclists don't mind not having an ocean view on a certain stretch.

It is assumed that this comment provides support for Alternative 4, which would not include an ocean view for a small stretch. The comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

I26-5 The comment relates to travel and tourism associated with the existing project site.

The City acknowledges the comment and notes that it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

I26-6 The commenter suggests that the engineering/development teams should be working together with the flying community and states that they have yet to hear from anyone involved in the project. The City has received a number of comments from the soaring community on the project's Notice of Preparation and has accounted for these comments in the preparation of the Draft EIR. The City acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

I26-7 The comment explains the importance of the site when it comes to soaring. The City acknowledges the comment and notes that it expresses opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

I26-8 The commenter would like to see all implications properly considered and efforts made to reach out and work with the flying community.

The City acknowledges the comment and notes that it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. Regarding coordination with the soaring community, please refer to response I26-6. No further response is required or provided.

Hi Nick,

Thanks for your hard work in overseeing the planning and designing of the Rincon Trail. I know it's difficult coordinating with all the stakeholders involved in this complex project. I'm hopeful we can find a solution for everyone.

I27-1

As a cyclist and a pilot, I believe we can build a better bike path together. The first step is considering flying recreation to be significant in the EIR, and addressing the outpouring of concern from the community about losing this recreation. On the day the Draft EIR was released for public comment, we started a petition to preserve the ridge at Bates which now has over 2,000 signatures and more than 60 comments. The metrics and comments are provided below for public record. This clearly demonstrates significant recreation under CEQA.

I27-2

I was heartened to hear the Environmental Review Committee's decision to recommend Alternate 4. Building on the North side of Bates ridge will save soaring at Bates and create a safer, more direct path for cyclists that avoids the crowded and steep Rinon parking lot. Seeing the Ocean shouldn't be a requirement for this project because there are plenty of views along the way like the whole bike path to Ventura.

I27-3

I appreciate the wind study, however, this document specifically states that it is based on theory and not intended for this purpose. Even if there is a correlation with reality, 20-30% loss of lift is very significant for pilots, especially on average wind days where the vertical lift component of lighter winds will be exponentially impacted by the benches and grades of this project. There are many days when the existence of this ridge is the sole reason pilots are able to maintain flight. It is the last natural remaining feature in this corridor and a truly unique recreational area that should be protected because it makes Carpinteria special.

I27-4

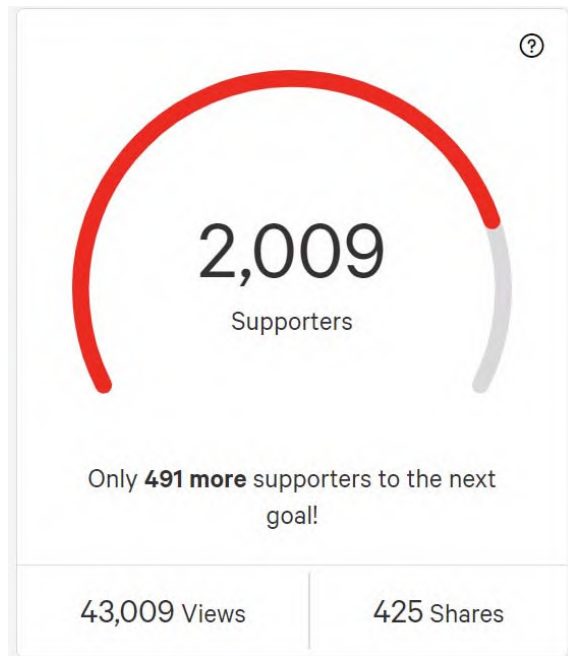
I believe the goal of the EIR is to address the impacts of the project, including a review of how recreation will be changed. Under CEQA, all recreation is valued equally if it exists. It is inappropriate for the EIR to impose judgements on recreational users or analyze rules governing their sport or how they gain access. All of these things are outside of the scope of the document and the project itself. Why does the EIR discuss flying rules, launch locations, and wing practices? Not only are these comments frequently inaccurate, something the Santa Barbara Soaring Association attempted to correct with a detailed letter submitted 8 months ago, but they are not relevant to preserving recreation. It seems the City is more concerned with marginalizing our recreation, repeating these vague technicalities, than supporting us. As a tax paying citizen of Carpinteria who moved here from across the country to paraglide, I don't understand why the City is ignoring this opportunity to save a special place and its continued recreation. When will the City start listening to the pilots who have been recreating here for over 40 years? Let's build a better bike path together and explore the possibilities of Alternate 4 on the North side of the ridge. Thank you!

I27-5

I27-6

I27-7

Petition metrics and comments:



DAVID RAYBOURN

3 days ago

I can ride my bike anywhere but there are only a few special and rare places to participate in foot-launched Aviation.

If the Historic Launch at Bates cannot be saved, then an alternative site should be created just for hang gliding and paragliding as mitigation.

The Wright Bros. were Hang Glider Pilots!

0

Jeffrey Gritsch

3 days ago

I like flying there!!!

0

Howard Tarpey

4 days ago

Ridge soaring and flying non powered aircraft like paragliders requires these beautiful and unique sites to be able to fly. Since these type of craft were designed people have been enjoying the purest form of flight without interfering with the land. These flying sites are a geographical creation of nature taking hundreds of not thousands of years in their making. A bike path can be laid almost anywhere and anytime. Let's preserve what nature has provided for us and build the bike path elsewhere. Thank you ☐☐

0

127-8

Bradley Whittemore

4 days ago

I support safe free flight and there are so few available today and don't want to lose one.

0

Tanner McMullen

1 week ago

What a tremendous environmental insult to move over a quarter billion pounds of earth so bikers can agro-pass each other with a bit more ease. I learned how to fly at this site, I will be devastated if it's destroyed.

0

Robert Jacobs

2 weeks ago

Massively changing topography for allowing one recreational activity to occur in the area at the expense of the other doesn't make any sense, just let the land be as it is, preserve what is already beautiful and useful, we don't need to dig up this place!

0

James E. Stelzer

2 weeks ago

This is a greatly needed site

0

Aaron Sagin

2 weeks ago

Flying the CA coast is one of the greatest expressions of joy that exists

0

Jordan Zweig

2 weeks ago

Im signing this petition because I am a local who frequently recreates in the area and because I am passionate about conservation. This area and the recreation opportunities it represents are very important to me.

0

Jake Spoelstra

2 weeks ago

Paragliding is cool!

0

Charles Gieser

2 weeks ago

I am signing to protect this beautiful land

127-8
Cont.

0

Scott Ball
2 weeks ago
Please dont destroy this world class recreational resource
0

Kiernan O Donovan
2 weeks ago
Preserve free flight.
0

Ronit Corry
3 weeks ago
Please save Bates!!!
0

Maximilienne Giannelli
3 weeks ago
This is an awesome paragliding site that should be preserved.
0

James Stubbs
Mar 21, 2021
because flying!
0

Robin Lang
Mar 21, 2021
Too much of Florida has been lost, destoryed and replaced by much worse than a bike trail. However, digging up hundreds of thousand pounds of soil that will ruin airflow? Playing with mother earth in this manner has got to stop. Heck, I won't even pick up a rock in a rivier because I worry about disrupting the flow of water. We must be more responsible, less greedy with an aware ego. Good luck TJ!
0

Jack Klim
Mar 21, 2021
#savethebates
0

Kevin Lamkin
Mar 20, 2021
As a resident of Carpinteria, an avid Hang Glider and cyclist, I urge the City Of Carpinteria to do the right thing

127-8
Cont.

and preserve this priceless soaring site while still providing cyclists with a route through the bluffs.
0

Mary-Elizabeth Prosser
Mar 19, 2021

I want to protect natural watershed. This site is important to many people, too.
0

Andrzej Rusztowicz
Mar 18, 2021

I bike much more often than I paraglide, and we need more bike paths everywhere. But it's also very hard to find good paragliding sites and we should not have one at the cost of the other. Let's work together!
0

Steven Garman
Mar 16, 2021
This is important.
0

Carolyn LaDuke
Mar 16, 2021
For a friend
0

Lee Eisler
Mar 16, 2021
I love flying and I love bates beach. It's a very special place. Not only do the paragliders love it but people come to watch all the time. It's exciting and beautiful to everyone! It's one of the things that makes Carpinteria special!
0

Genese Izuno
Mar 16, 2021
There are tons of trails around Carpinteria. There is only one paragliding area. Please let them have the natural lift provided by Bates Ridge.
0

Adrien Spiegel
Mar 16, 2021
let's make our outdoors more accessible for all people participating in an assortment of different activities
0

Adam Zerkel

127-8
Cont.

Mar 15, 2021
Haven't we paved enough?

why not a lower impact plan to support the current use community?

If more development is important here for someone, who is that someone and what is the value of this project for them?
0

Alexander Hoffman
Mar 15, 2021

I grew up in this community and know how special it is to advocate for this. As an avid cyclist I see no need for more concrete to be poured ANYWHERE to make cycling paths, especially when they will damage the ecosystem so heavily. Animals depend on the shoreline for life, we depend on the living to live, the more you build the more you turn the living zones into dead zones. So Please Dont Build this!!
0

Patrick Blackburn
Mar 15, 2021

We need to do everything we can to preserve all existing foot launched flying sites in the U.S.!!!
0

Chien Dinh
Mar 15, 2021
Please keep Bates open.
0

Lawrence Chamblee
Mar 15, 2021

Development has gobbled up most of the historic hang gliding sites, leaving practically no place to enjoy our passion for flying. I love cycling too, but cycling opportunities are blossoming, while silent soaring sites disappear. Please reconsider this bike path plan so it doesn't destroy a unique coastal flying site.
0

william hetzel
Mar 15, 2021
Bates is treasured flying site! Please keep it intact.
0

Josh Heater
Mar 15, 2021

Flying sites are very difficult to come by. I hope the bike route plans not negatively impact the flying site.
0

I27-8
Cont.

Randolph Ruffin
Mar 15, 2021
I love flying at Bates. There must be a way to make a bike path and not destroy the hill.
0

Keith Smith
Mar 15, 2021
I hate to see this awesome site lost when there are better optios.
0

Hugh Cartmill
Mar 15, 2021
There are better alternatives which will allow flying to continue.
0

topher mira
Mar 14, 2021
I'm a paragliding pilot and I support this
0

Scott Schoenfeld
Mar 14, 2021
I'm a Carp local and want to continue flying at one of the most beautiful coastal sites in CA.
0

John Fritsche
Mar 14, 2021
This is one of the few unique sites that make soaring hang gliders and paragliders possible in coastal California!
0

Colin Beach
Mar 14, 2021
Hang gliding as a sport is diminishing. We need to preserve the limited flying sites we still have
0

Judith Hutchinson
Mar 13, 2021
Please don't destroy this site.
0

Derek Mckee
Mar 13, 2021
Theres always another way and 40 years deserves respect

127-8
Cont.

0

Zachary Majors

Mar 13, 2021

When the conditions are good for flying at Bates, there are usually no other good options for that day. Bates is a treasure of a flying site and I usually spend money 8n Carpenteria after flying there.

0

karim salsbury

Mar 13, 2021

Would be a shame to close this

0

michael holden

Mar 13, 2021

I have always enjoyed the location, for surf, paddling, and zero construction/obstruction for its natural location. My son and I have just now gotten into flying and had hoped to utilize this location.

0

Houser Ron

Mar 13, 2021

Ron Houser

0

Neal Michaelis

Mar 13, 2021

As a cyclist and pilot, it would be nice to have a solution that respects both pursuits. Please don't destroy this amazing flying resource.

0

doria wosk

Mar 13, 2021

JUSTICE FOR WE THE PEOPLE. SAVE BATES-CARPINTERIA HISTORIC FLYING SITE

0

Warren Flatte

Mar 13, 2021

To help preserve free flight, especially when there are alternatives to explore

0

Bro Childs

Mar 13, 2021

As a Mtn biker and pilot I value both activists greatly. However, soaring sites in the air required a special

combination of geography and airflow which can be rare to find. Please preserve this rare treasure, and relocate and/or redesign the Mtn bike trail that both activities may be enjoyed.

0

Norma Ryan

Mar 12, 2021

Please allow this beautiful sport to continue. To those of us traveling north up the coast it is the most awesome sight to see the paragliders and the hang gliders flying like butterflies above the bluff and welcoming us to Carpinteria. The surfers, the sunbathers, the people who just come to watch this amazing show of athletic achievement, all appreciate the beauty. Keep this area multi-use and if a better bike path needs to be built I'm sure the cyclists would be in favor.

0

Sandy Minitello

Mar 12, 2021

Sandy Minitello

0

Cyndia Zumpft

Mar 12, 2021

I want to fly there someday! It is a beautiful spot!

0

Harvey Levine

Mar 12, 2021

Everyone needs a chance follow their passion. And though I would not volunteer to soar, I enjoy the beauty created by those who do!

0

Alexander Tchourbanov

Mar 12, 2021

This site is unique and deserves preservation. So many flying sites in CA have been forever ruined by development.

0

Lincoln Kroll

Mar 12, 2021

Hang Gliding sites are rapidly disappearing across California. We need to preserve all remaining sites that are safe and accessible, for today and future pilots..

0

Gordon Cayce

Mar 12, 2021

In the late seventies Seagull Aircraft moved their factory from Santa Monica to Carpinteria. Their shop was

located in the small industrial park literally minutes away from Bates Road. We used Rincon Mt. for test flying new gliders, but Bates was one of our favorite sites. With the Seagull shop so close it felt like our personal site. I spent many long hours waiting for the wind to come in off the ocean and spent many hours soaring with Tom Peghiny, Glenn Hackett, Paul Hobson, Tom Haddon, Darrell Bibby and so many great Santa Barbara pilots. It would be a great disappointment to lose this classic small site that has been flown for so many years.

0

Rick Warner

Mar 12, 2021

I want the Bates flying site preserved. Please design a bike path that does not impact the topographical features of this area.

0

Shirley Docken

Mar 12, 2021

I want to support keeping this unique topography as is. Other bike paths can be used.

0

Calvin Grier

Mar 12, 2021

We need to preserve the area for all recreational use, not just hiking and biking.

0

Kim Browder

Mar 12, 2021

This is a truly unique and rare site for paragliding pilots. Pilots come from all over the world to fly Bates...do cyclist? Save Bates...it is a treasure!!

0

Дмитрий Хайруллин

Mar 11, 2021

All sports are important! I believe there are plenty bike paths there.

0

Jennifer Lauritzen

Mar 11, 2021

Paragliding is a beautiful sport for both spectators and pilots. Ruining a historical recreational site for a bike path, especially when alternate bike path options exist, is irresponsible land management.

0

robert sporrer

Mar 11, 2021

This project will disrupt the airflow that make it possible to fly paragliders and hang gliders. There are other options

127-8
Cont.

0

David Hunt

Mar 11, 2021

I travel frequently to Santa Barbara solely to paraglide and support efforts to keep this flying site and tourist income viable.

0

Daniel Redding

Mar 11, 2021

Super important site! Please keep it open for all!

0

Daniel Vallieres

Mar 11, 2021

Don't lose this valuable site. It is part of what makes me want to drive down south for vacations

0

Vinay Shah

Mar 11, 2021

I live in Boulder, CO but I spend significant time in this area during the winter specifically for the flying. Bates offers a type of flying (ridge soaring) that is difficult to find in CO, and being able to practice here has helped me and others become better, safer pilots flying in an environment where we can safely build up flight hours.

1

Daniel Garcken

Mar 11, 2021

I want to preserve the flying site at Bates but also wish to see the bike bath be reimagined in a way that doesn't impact the flying at the site.

0

127-8
Cont.

Response to Comment Letter I27

Jeffrey A Longcor

April 25, 2021

- I27-1** The comment expresses appreciation to the City regarding planning a new bike path, provides an introduction for the comments to follow, and provides personal background on the commenter.
- The City acknowledges the comment as an introduction to comments that follow. No further response is required.
- I27-2** The comment expresses that, based on the petition to preserve the site that gained over 2,000 signatures and more than 60 comments, impacts to recreation should be considered significant under CEQA.
- See Global Response GR1. The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I27-3** The commenter expresses support for Alternative 4. The comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I27-4** The commenter expresses concern regarding the wind study and believes that 20-30 percent loss of wind should be considered significant.
- See Global Response GR1.
- I27-5** The commenter states that it is inappropriate for the EIR to impose judgements on recreational uses or analyze rules governing the sport or how they gain access.
- Please see Global Response GR1 regarding the inclusion of soaring fundamentals, existing launch practices, and FAA regulations in the Recreation Section of the EIR. The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I27-6** The commenter feels that it is inappropriate for the EIR to discuss flight rules or launches, and that this has been described incorrectly in the Draft EIR. The comment also provides general dissatisfaction with the City and the project.
- Regarding the discussion of flight rules or launches, see Global Response GR1. In addition, the City acknowledges the comment and notes that it expresses the opinions of the commenter and general opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

- I27-7** The City acknowledges the comment and notes that it expresses general opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I27-8** The commenter provides a sample of the approximately 2,000 responses to a survey they circulated regarding “preservation of the ridge at Bates.” The City acknowledges the survey responses submitted with the comment, and notes they expresses general opposition for the proposed project but do not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

Hi Nick, I'm a Colorado native and have been spending my winters here in SB I for some time now mostly because of the variety, and quality of the paragliding it offers. It's a very special place with an amazing history of free flight. Bates is one of the top spots in the country for coastal soaring offering a very rare opportunity for the pilot to "climb out" in the lift where the wind sock is located and fly cross country south towards Ventura. I don't know of any coastal sites in the US where paragliders and hanggliders are that blessed! Kind of similar to surfing Rincon, it's just that special. Thanks for reading Nick, I share the same feelings of many others that the history of free flight there should be saved and the bike path on the 101 side makes sense.

Cheers,

Jason Lombard

I28-1

Response to Comment Letter I28

Jason Lombard

April 26, 2021

I28-1

The comment provides general background on the opportunities for recreation the project site provides for paragliders and hang gliders.

See Global Response GR1. The City acknowledges the comment and notes that it expresses general opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

4-25-2021

Thank you for the opportunity to comment on the draft EIR for the path.

It should by now be quite obvious to all that the plan to have the path on the ocean side of the main bluff will never be permitted, as there simply **is no mitigation possible** for the very significant impact to existing recreation.

I29-1

The focus from this point forward should **ONLY** go towards some version of **ALTERNATIVE 4** that does not remove any aspect of the south-west or west area of the main bluff. Not transitioning to a more acceptable design **NOW** will only delay the permitting process and cost taxpayers more unnecessary expense.

Instead of just using the current design on the north side of the RR tracks for the start of alt 4, please re-design/engineer the alternative 4 concept to have the north side of the bridge closer to the freeway and then rotate the bridge about 10 degrees counter-clockwise--moving the south end of the bridge to the east. Although the repositioning would likely require more substantial bridge supports to accommodate the slightly longer span on the cuts above the RR tracks if using the same length of pre-fab bridge, moving the south-side bridge terminus further to the east would result in a considerable reduction of the earthwork needed as compared to what is stated in the current EIR draft for alternative 4.

I29-2

Please don't be misled by the conclusions within the draft that are primarily derived from statements from the preceding MMD that are most likely from the input of just **one** person, **the applicant**. Consider the reasons why public entities often save money and time when they contract with private planning/permitting services for projects that can be cumbersome.

I29-3

Thank You,

John Greynald

805 886-6160

Response to Comment Letter I29

John Greynald

April 26, 2021

- I29-1** The commenter states that the project cannot be permitted as there is no mitigation possible for the very significant impact to recreation.
- See Global Response GR1. The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I29-2** The commenter expresses support for Alternative 4 over the proposed project but proposes certain revisions to the design of Alternative 4.
- The City appreciates the commenter's recommendations. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- I29-3** The commenter states that the Draft EIR conclusions are derived from the previous MND that were based only on the opinions of the applicant.
- It is assumed that the commenter is referencing the 2015 MND and the 2019 Subsequent MND, prepared for the proposed trail. The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

Greetings,

My name is Ajay Rajamani and I am a local paraglider pilot and cyclist. Having biked the entire pacific coast from SF to LA, I really appreciate the effort to allow cyclists to keep off the highway between Carpinteria and Ventura. However, after attending the town hall meeting last week I strongly feel that Alternate 4 is the best plan to move forward with the project. That is, building the path on the north side of Bates Ridge to preserve freeflight and limit erosion damage to the cliff face.

I30-1

While seeing the ocean is nice, there are already miles of oceanside bike paths between SB and Ventura, in particular immediately after the proposed extension there is ~4 miles of prime oceanside bike path from the Rincon parking lot to Mussel Shoals. I don't think it's worth destroying a nationally renowned flying site that attracts pilots from all over the country for less than 400m of additional seaside views. In addition, I am highly concerned over the erosion and construction impact of building on the south side, which would likely wash tons of soil and chemicals into the ocean.

I30-2

Thank you for considering my comments. I hope we can arrive at a solution for this project that satisfies all user groups.

I30-3

-Ajay Rajamani

Response to Comment Letter I30

Ajay Rajamani

April 26, 2021

- I30-1** The commenter expresses support for Alternative 4. The comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I30-2** The commenter expresses concern regarding erosion and construction impacts of building on the south side, which could wash soils and chemicals into the ocean.
- The proposed project's impacts to erosion have been analyzed in Section 3.5.4. As discussed in this section, implementation of mitigation measure MM-GEO-3, which includes recommendations from the geotechnical report regarding slope construction, would reduce impacts to less than significant with mitigation. In addition, the project's impacts to water quality have been analyzed in Section 3.8.4. As discussed in this section, with implementation of mitigation measures MM-WAT-1 through MM-WAT-5, potential project impacts to surface water quality would be reduced to less than significant. In addition, per Section 3.8.4, release of project storm drainage along the beach would not result in substantial erosion, as the introduction of impervious surfaces would be minimal compared to the overall project drainage area and the trail drainage will be divided into 6 separate outlets to minimize the discharge volume from any of the outlets.
- I30-3** The commenter provides appreciation to the City for considering their comments. The City acknowledges the comment and notes that it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required or provided.

Hello Nick,

The current plans for the Carpinteria-Rincon Trail project will impact paragliding and hang gliding in the Carpinteria, Santa Barbara and greater SoCal areas. I am a representative of the paragliding and hang gliding community in Santa Barbara County, and myself and other members from this community were sad to find that the new plans for the trail will involve significantly cutting into Bates Ridge, which would effectively end paragliding and hang gliding in the area.

I31-1

We are asking the city to consider putting the trail on the north side of Bates Ridge (between the highway and the ridge), rather than cut into the ocean-facing side where the lift for flying is generated. The planned grading profile on the ocean-facing side of the ridge will decrease the steepness of the ridge, reducing or eliminating the strong upward draft necessary to fly. The grading will also decrease the distance between pilots and pedestrians/obstacles/the ground, making for dangerous conditions. Additional grading shelves will likely disrupt airflow and/or make it too turbulent.

I31-2

Ninety percent of the flying at Bates occurs on this ridge, which is one of only three ridges available for flying between San Diego and Big Sur. Hang gliders and paragliders have been flying here for 30-plus years—it is a historic site with hundreds of pilots flying here every year. Pilots have moved to Carpinteria specifically for the flying. Many paragliders and hang gliders are also cyclists, roller bladers or runners—we think the bike path is a great idea. We would like to work with the city to find an option that does not destroy this beautiful, historic site.

I31-3

I appreciate the work that has gone into planning this bike trail, but want to see it improved.

I am devastated that the Draft EIR considers the impact to my flying recreation to be 'insignificant'

I31-4

I signed a petition to preserve Bates Ridge that has 2,000 signatures and over 60 comments.

I31-5

I fully agree with the Environmental Review Committee's decision to recommend Alternate 4, building on the North side of Bates ridge, preserving the soaring recreation.

I believe building a bike path on the North side of Bates bluff is best for all recreational users, it is a safer, more direct path for cyclists, giving them a path that avoids the crowded, steep, and dangerous Rincon parking lot.

I31-6

I am a cyclist and want a direct route on the North side, rather than an Ocean view. Seeing the Ocean shouldn't be a requirement for this project because I get plenty of views along the way like the whole bike path to Ventura.

↑ I31-6
Cont.

I am concerned the current plan will require maintenance against rising seas as it is being built near an eroding seawall. Relocating to the other side of the ridge is financially responsible.

I I31-7

I appreciate the wind study done by the engineers, however, this study specifically states that it is based on theory and not intended for this purpose. Even if accurate, 20-30% loss of lift is very significant to me, especially on average wind days where lighter wind flow will be exponentially impacted by this project.

I I31-8

I feel it's inappropriate for the EIR to discuss free flight rules or launches, this is outside the scope of the document and project, the focus of the EIR and CEQA is preserving recreation at the project site.

I I31-9

I don't understand why the City continues to brush me aside and has failed to reach out to the soaring community. There are inaccurate statements in the Draft EIR because the authors refuse to listen to the pilots who have been recreating at Bates for over 40 years. Let's build a better path together.

I I31-10

Coastal soaring at Bates makes Carpinteria truly special and unique, I can bike almost anywhere, but I travel to Carp for the flying at Bates and spend my money there.

I I31-11

Thank you

Rob Sporrer
Santa Barbara Resident since 1995

Response to Comment Letter I31

Rob Sporrer

April 26, 2021

- I31-1** The commenter expresses concern regarding the loss of paragliding and hang gliding associated with the project.
- Please see Global Response GR1. The City acknowledges the comment and notes that it expresses opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I31-2** The commenter expresses support for Alternative 4, providing the opinion that the proposed recontouring of the ocean-facing side of the ridge would reduce or eliminate the strong upward draft necessary to fly.
- Please see Global Response GR1 that discusses the air flow analysis and project impacts on existing soaring opportunities. The comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I31-3** The comment provides background on the project site, as it relates to soaring activities, and states the site is a historic site.
- The City acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The project's impacts on historic resources were analyzed in Section 3.4.4. As discussed in this section, no historical built environment resources exist within or near the proposed project site. Therefore, no further response is required or provided.
- I31-4** The comment expresses concern that impacts to recreation associated with the proposed project were determined to be insignificant in the Draft EIR.
- See Global Response GR1. The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I31-5** The commenter states that they signed a petition that had 2,000 signatures and more than 60 comments to preserve the site.
- The City acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I31-6** The commenter expresses support for Alternative 4 over the proposed project but proposes certain revisions to the design of Alternative 4.

- The City appreciates the commenter's recommendations. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- I31-7** The commenter expresses concern regarding eroding seawalls and rising sea levels, and states that Alternative 4 is more financially responsible.
- See response I22-6, above.
- I31-8** The commenter expresses concern regarding the accuracy of the wind study and believes that 20-30 percent loss of wind should be considered significant.
- See Global Response GR1.
- I31-9** The commenter feels that it is inappropriate for the EIR to discuss flight rules or launches, and states the focus of the EIR should be to preserve recreation.
- See Global Response GR1.
- I31-10** The commenter states that the City has failed to reach out to the soaring community, resulting in inaccurate statements in the Draft EIR.
- The City acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The City has received a number of comments from the soaring community on the project's Notice of Preparation and has accounted for these comments in the preparation of the Draft EIR. Therefore, no further response is required or provided.
- I31-11** The commenter explains the uniqueness of the project site relative to soaring opportunities afforded by existing conditions within the project alignment.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

Nick Bobroff

April 25, 2021

Principal Planner

Community Development Department

City of Carpinteria 5775 Carpinteria Ave. Carpinteria, CA 93013

Hello Mr. Bobroff and readers of this letter,

This is my third reply to the Zoom webinar meeting on April 13, 2021 of the Environmental Review Committee concerning the Multi Use Trail (M.U.T.). The M.U.T. has certain uses that will be banned. The presented proposal will not provide; improved public coastal access, recreational opportunities, or add to regional coastal resources. The “shared-use,” trail will be limited to less than, “multiple,” or “shared,” uses.

I32-1

The ever increasing, electric powered bicycles, already “illegal,” (as mentioned, by Matt Roberts), on any bike path in the City of Carpinteria, are to be specifically banned. They are currently in use on all bike routes, within the City. What about skateboards? Electric powered skateboards? Roller blades/skates? Radio controlled cars? Street Luge? Sidewalk surfers? Scooters? Minibikes? Wagons? Horses (ten foot wide “path,” with 3-foot-wide paved shoulder)? Are the primary users, bicyclists, relegated to the shoulder? (see attachments 3.1, 3.2,3.3)? The proposed sixteen-foot width of the M.U.T. will attract these, and other users, and result in substantial conflicts with primary users and pedestrians.

I32-2

The proposed removal of 92,526 cubic yards of the existing Little Diamondhead Bluff, will be an elimination of a regional coastal resource (see attachments 3.4, 3.5.). An average dump truck can haul 10 cubic yards of dirt. If there are 10 dump trucks, per day removing dirt and debris, seven days a week, it would take almost three years, to remove. The resulting traffic, inevitable debris removal complications, cultural resource discovery and preservation, aesthetics, biological and environmental issues, equipment exhaust and staging, noise, freeway lane, road, bike path, parking lot, and beach closures will expand the expected costs, and timeline to complete. More and larger dump trucks will be the City’s most likely response to shorten the debris removal and construction timetable. Where will 14,860 cubic yards of dirt and debris, be staged, on the construction site?

I32-3

I32-4

I32-5

A survey of road bicyclists (see attachment 3.6) agrees with the Committee. Alternative #4, should have an external width (except for two switchbacks, to reduce speed of bicyclists crossing Bates Road) of no more than eight feet. Final grade, and accessibility, will follow ADA requirements. This will substantially lessen the costs, and construction timeline, and environmental impact. It should continue to be constructed by the California Department of Transportation. No private contractors should be used. Preserve Little Diamondhead!

I32-6

Respectfully,

Ottis Gillespie

3.1



132-7

3.2



I32-7
Cont.

3.3



I32-7
Cont.

LITTLE DIAMONDHEAD 3.4



VIEW FROM ON RAMP
NB 101 AT BATES ROAD

132-8

LITTLE DIAMONDHEAD 3.5



VIEW FROM NB 101

I32-8
Cont.

3.6

MULTI USE TRAIL BICYCLISTS SURVEY 2020

A survey of 100 bicyclists, that stopped on the King property, to watch paragliders, and enjoy the view, was conducted by me. I introduced myself, stated I was a paraglider pilot, and asked them, if they would mind, taking a verbal, two question, survey, concerning the M.U.T. This survey was in July through September, 2020

- 1) Are you a local resident, or from out of town?
- 2) Considering the prevailing Southwest wind, would you prefer to have the bike path extended across the Pacific Ocean side of that Bluff (as I pointed to Little Diamondhead), or on the freeway side?

The bicyclists that responded verbally as "local,"	87
Respondents from "out of town,"	13
Total	100

Pacific Ocean side preference:	3
--------------------------------	---

Local	2
-------	---

Out of town	1
-------------	---

Freeway side preference:	96
--------------------------	----

Local	83
-------	----

Out of town	13
-------------	----

Abstention from choosing :	1
----------------------------	---

132-9

Response to Comment Letter I32

Ottis Gillespie
April 25, 2021

- I32-1** The commenter notes his letter is in response to the April 13, 2021 presentation on the proposed project. The commenter believes that certain uses would be banned under the project and that the project would not provide adequate recreational uses.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I32-2** The commenter expresses concern that the proposed project would attract electric bikes, skateboards, roller blades/skates, horses, wagons, and other uses.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I32-3** The commenter states that the removal of the bluff would be a removal of a regional coastal resource and references attachments 3.4 and 3.5 (see response I32-8).
- Please refer to Global Response GR1 for discussion regarding the air flow analysis and project impacts upon recreation (soaring opportunities). The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I32-4** The comment expresses concern regarding the environmental impacts associated with earth materials removal.
- The environmental impacts associated with export of the soils on-site have been analyzed throughout Chapter 3 of the Draft EIR. The commenter does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I32-5** The commenter states that the City will likely require more and larger trucks to shorten debris removal and the construction schedule and asks where staging of debris would occur.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter. The project's construction schedule and number of haul trips associated with the project are outlined in Section 3.2.4 of the Draft EIR. Excavated soil materials would be loaded into haul trucks simultaneous with the grading activity; a limited volume of soil stock-piling would occur in the vicinity of active grading (within the project site) between the loading operations for individual haul trucks.

- I32-6** The commenter expresses general support for Alternative 4. The commenter suggests that the width of the proposed bike route should be no wider than 8 feet, with the exceptions of switchbacks. The comment provides additional recommendations for Alternative 4.
- The City acknowledges the comment and appreciates the commenter’s suggestions regarding the 8-foot path width. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I32-7** The commenter provides illustrations of sports activities referenced in comment I32-2. The comment does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I32-8** The commenter provides photographs of the ridge area commonly called “Little Diamond Head.” See response I32-3. The comment does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I32-9** The comment provides the results of a survey. The comment does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

Hi Nick,

I am writing to comment about the bike path that could potentially destroy a natural resource for the flying community in SB county. I am very appreciative of the work that has been done thus far and am hopeful that you will look beyond the Draft EIR which stated that the impact would be "insignificant."

I33-1

As a pilot for almost 20 years, I can attest that removing earth on the South Side of the bluff to build the bike path would ruin our ability to soar those bluffs. I agree with the Environmental Review Committee's decision to recommend "Alternate 4" in order to preserve our soaring ability on the South Side of the bluff.

I33-2

As an avid bike rider, I also agree with building on the North side of the bluff. I can't imagine the craziness in the summer of trying to negotiate the busy parking lot. It makes sense for fluidity and speed to route the path on the North side of the bluff.

I hope that as we move forward in this plan, you reach out and listen to our community of pilots and professionals. We are fighting to save this place because it is special in the hearts of hundreds of pilots nationwide and a real treasure in our area. Please make the best choice for all involved.

I33-3

Respectfully,

Tim Barker

--

Tim Barker

5th grade Hope School

"You cannot teach a man [woman] anything; you can only help him find it within himself."
Galileo Galilei (1564-1642)

Response to Comment Letter I33

Ottis Gillespie
April 25, 2021

- I33-1** The commenter expresses the opinion that the bike path could destroy a natural resource for the flying community.
- Please see Global Response GR1. Further, the City acknowledges the comment and notes that it expresses general opposition to the project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I33-2** The commenter opines that removing earth on the south side of the bluff would ruin the ability to soar these bluffs and expresses general support for Alternative 4.
- Please see Global Response GR1. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I33-3** The commenter makes general remarks about future coordination with the City and the soaring community. The comment does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

Im sending this email in protest of the Draft EIR statement that there is an insignificant impact to the flying at the Bates Launch.
30 % reduction in lift will ruin the flying on the hill as that small margin of lift is needed for soaring flight.

I34-1

I have contacted Dennis Page, whose work and calculations were used in the Draft EIR and he pointed some flaws in the study. I have asked him to draw up some drawing to show why there is such a big impact. I have known Dennis for 35 years and so he is willing to draft them up for us.

I34-2

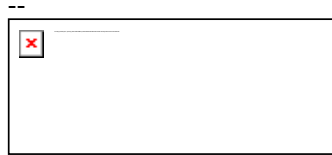
I was happy to hear that the community is willing to look at the North side path that works to not affect the flying on the south side of the hill

I34-3

There is a Petition to preserve Bates Ridge that 2000 people have now signed it will be presented to the city. I believe this shows a strong desire to preserve flying while still being able to get a bike path down to the beach. We have spoken with many bike groups and they are in support of running the trail down to connect with the other trail.

I34-4

Thanks Karl Cameron



Karl Cameron
Product Manager

Observables, Inc.

119 N Milpas Street
Santa Barbara, CA 93103

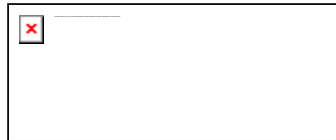
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Response to Comment Letter I34

Karl Cameron
April 26, 2021

- I34-1** The commenter states the opinion that the proposed project would ruin the opportunity of flying over the bluffs area due to the 30 percent reduction in lift.
- Please refer to Global Response GR1.
- I34-2** The commenter indicates they will be contacting Dennis Page to create a drawing that illustrates how the air flow analysis is flawed. However, no specific critique of the air flow analysis is provided in the comment.
- Please refer to Global Response GR1.
- I34-3** The commenter expresses general support for Alternative 4. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I34-4** The commenter references the petition to preserve the site. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

William C. Prechter
Civil Engineer
 PO Box 454 Nevada City, CA 95959
 (530) 265-0733

March 3, 2020

RE: Carpinteria Rincon Trail Project

To Whom it may concern:

On a recent trip to the Ventura and Carpinteria area, specifically to the Bates Paragliding site I was told of the proposal to put in a new bike path. After hearing of the proposal and looking at the proposed alignment a letter seemed in order. I am a Professional Civil Engineer, avid bicycle rider, both road and mountain and a paraglider pilot.

I currently live in Nevada City, California and for the past eight years have made several trips each year to the area. If conditions are right each trip involves surfing, flying and bike riding. The Bates flying site represents a very special and unique feature that is found in only a handful of places along the coast of California especially in regards to the accessibility of the site. Not only are the views awe inspiring and incredible, the drive-up nature of the site makes it extremely appealing. As a bicycle rider I also appreciate the bike paths that have been made in an attempt to keep cyclists safe from traffic.

I35-1

Looking at this proposed path alignment, the main goal of it seems to be maximizing ocean views, which it does well. Other significant factors appear to have been neglected and or overlooked. I'll list three here. First, this path creates a potential conflicting and hazardous interaction between two recreational activities, paragliding and bike riding. In low wind conditions paraglider pilots often find lift by flying close to hill or mountainsides. Picture a bicyclist descending the path with a paraglider pilot 6' off the ground in an oncoming direction. Second, this path puts bicyclists directly at the end of an already congested and narrow parking lot. As a road bike rider, myself and most others I know go will go to lengths to avoid riding through busy parking lots. The variability of drivers and non-predictability is high. Riding in a bike lane alongside traffic represents for the most part a more predictable outcome. Drivers are in a lane heading in a particular direction. A parking lot is far more prone to vehicle randomness and thus undesirable and dangerous, to the rider, interaction. Third, tax payer expense both short term and over the course of time. Pursuing this alignment is no small feat in regards to labor, earthwork quantities and the potential building of a bridge. I believe exact earthwork quantities have been presented in other letters. Longevity of the project is questionable as it would be built atop a slope with marginal stability. One need only walk down to the Bates beach and look at the hillside to see what time and environmental factors do the soil at hand.

I35-2

I35-3

I35-4

I35-5

I35-6

William C. Prechter
Civil Engineer

PO Box 454 Nevada City, CA 95959
(530) 265-0733

In my own consulting practice I strive to keep architectural design and aesthetics as a main priority. As such I can appreciate what this path is attempting to do. There are at times moments where overall functionality, practicality and macro perspective can be forgotten in one's attempt to hold too firm a grasp to a single idea. This appears to be the case here. I strongly encourage the thorough investigation of other options prior to the approval of this particular path. As it would appear all factors have not been considered.

135-7

Sincerely, 
William Prechter PE



Response to Comment Letter I35

William Prechter

March 3, 2021

- I35-1** The commenter provides personal background and explains the uniqueness of the project site. The City acknowledges this comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I35-2** The commenter provides the opinion the trail design appears to maximize the objective of providing ocean views but neglects other important factors. The City acknowledges the comment as an introduction to comments that follow. No further response is required.
- I35-3** The comment expresses concern regarding conflicts between paragliding and bike riding, specifically pointing out the potential for collisions between cyclists and low altitude paragliders.
- The City acknowledges the comment. As discussed in the Air Flow Analysis (Appendix I of the EIR), the zone of greatest vertical air velocity (i.e., “lift”) occurs above the front edge (windward edge) of the ridge, not along the slope face. The proposed trail would be situated on a bench cut within the slope face, below the elevation of the ridge top. The only area where the trail would be the same elevation as the ridge would be at the bridge over-crossing of the UPRR corridor. The visibility between pedestrians/cyclists and paragliders would be unobstructed in this section of the trail, minimizing any potential for accidents involving conflicts between trail users and soaring activities.
- I35-4** The comment expresses additional bicycle safety concerns involving conflicts between cyclists and vehicle maneuvers in the Rincon Beach County Park parking lot.
- As discussed in Section 3.12 (Transportation) of the Draft EIR, the City’s consulting traffic engineer determined there would not be a significant hazard associated with introducing additional cyclists traversing the Rincon Beach County Park parking lot. Vehicle maneuvers in the parking lot involve low speeds, and signage in the parking area would alert drivers to cyclists passing through the area. Signage at the terminus of the trail leading into the parking area would also alert cyclists to reduce speed and employ appropriate caution when riding through the parking lot.
- I35-5** The comment expresses concerns regarding expenditure of tax-payer funds to construct and maintain the proposed trail.
- The City acknowledges the comment and notes that it raises economic issues that do not appear to relate to any physical effect on the environment. No further response is required because the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- I35-6** The comment expresses concern regarding landform alteration.
- See Global Response GR2.

Good afternoon Mr. Nick,

I appreciate the work that has gone into planning this bike trail, but want to see it improved.

I 136-1

I am devastated that the Draft EIR considers the impact to my flying recreation to be ‘insignificant’

I 136-2

I signed a petition to preserve Bates Ridge that has 2,000 signatures and over 60 comments.

I 136-3

I fully agree with the Environmental Review Committee’s decision to recommend Alternate 4, building on the North side of Bates ridge, preserving the soaring recreation.

I believe building a bike path on the North side of Bates bluff is best for all recreational users, it is a safer, more direct path for cyclists, giving them a path that avoids the crowded, steep, and dangerous Rincon parking lot.

136-4

I am a cyclist and want a direct route on the North side, rather than an Ocean view. Seeing the Ocean shouldn't be a requirement for this project because I get plenty of views along the way like the whole bike path to Ventura.

I am concerned the current plan will require maintenance against rising seas as it is being built near a eroding seawall. Relocating to the other side of the ridge is financially responsible.

I 136-5

I appreciate the wind study done by the engineers, however, this study specifically states that it is based on theory and not intended for this purpose. Even if accurate, 20-30% loss of lift is very significant to me, especially on average wind days where lighter wind flow will be exponentially impacted by this project.

I 136-6

I feel it’s inappropriate for the EIR to discuss free flight rules or launches, this is outside the scope of the document and project, the focus of the EIR and CEQA is preserving recreation at the project site.

I 136-7

I don’t understand why the City continues to brush me aside and has failed to reach out to the soaring community. There are inaccurate statements in the Draft EIR because the authors refuse to listen to the pilots who have been recreating at Bates for over 40 years. Let’s build a better path together.

I 136-8

Coastal soaring at Bates makes Carpinteria truly special and unique, I can bike almost anywhere, but I travel to Carp for the flying at Bates and spend my money there.

I 136-9

Thank you very much.

Kindest regards,

JG

Response to Comment Letter I36

Jorge Granier
April 26, 2021

- I36-1** The commenter expresses appreciation to the City regarding planning a new bike path but would like to see improvements.
- The City acknowledges the comment as an introduction to comments that follow. No further response is required.
- I36-2** The comment expresses concern that impacts to recreation associated with the proposed project were determined to be insignificant in the Draft EIR.
- Please refer to Global Response GR1.
- I36-3** The commenter references the petition to preserve the site. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I36-4** The commenter expresses general support for Alternative 4. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I36-5** The commenter expresses concern regarding eroding seawalls and rising sea levels, and states that Alternative 4 is more financially responsible
- See response I22-6, above.
- I36-6** The commenter expresses concern regarding the accuracy of the wind study and believes that 20-30 percent loss of wind should be considered significant.
- See Global Response GR1.
- I36-7** The commenter feels that it is inappropriate for the EIR to discuss flight rules or launches, and states the focus of the EIR should be to preserve recreation.
- See Global Response GR1.
- I36-8** The commenter states that the City has failed to reach out to the soaring community, resulting in inaccurate statements in the Draft EIR.
- The City acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The City has received a number of comments from the soaring community on the project's Notice of Preparation and has accounted for these comments in the preparation of the Draft EIR. Therefore, no further response is required or provided.

I36-9

The commenter explains the uniqueness of the project site relative to the existing soaring opportunities afforded by the site.

The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

Dear Nick,

Please accept this letter in response to the comment period for the Rincon Trail Draft EIR.

The decision to build the Rincon Trail as currently proposed would have an irreversible impact on the paragliding and flying community. From my perspective, having paraglided from Bates County Park Bluff area for over 10 years, constructing the trail on our precious bluff would be akin to draining the ocean, stopping the wave pattern for surfers at Rincon and render this spot use less.

I37-1

To us pilots who currently utilize the updraft of wind to fly, modifying this wind draft would render our site useless. How harsh and horrible would it be for surfers to lose their ocean? In essence, the currently proposed M.U.T. takes our wind away and obliterates all paragliders recreational activity.

I37-2

These paragliding flying sites are very rare and to have one in our backyard is an esteemed treasure and a prize recreational attraction for pilots, locals and visitors from all over the world. Every time I fly, I meet someone who has arrived in Carpinteria to paraglide. I've met thousands of people, including individuals from Germany, France, Italy, South America and several European and US locations.

I37-3

Paragliding is a vital part of the Queen of the Coast along with the Rincon surf spot it is a world-renowned destination which creates millions of dollars of tourist income for the City of Carpinteria and the County of Santa Barbara.

I am constantly asking local community members, cyclists, and visitors what they think of the proposed Rincon Trail Project which cuts into our flying site and takes thousand of tons of dirt from the bluffs. Nearly 100% of those I spoke with say the project shouldn't be built if paragliding is lost to gain a bike/pedestrian pathway.

I37-4

Santa Barbara County is currently surveying local residents as to how they can provide more recreational activities for the community. There are supposedly grant funds available to increase recreational activities for our citizens. Why then is Carpinteria City proposing the Rincon Trail Project which would ultimately take away paraglider's recreational activity?

I37-5

There is no logical reason for paragliders to lose their last remaining little gem for our recreation and leisure experience. Option number #4, constructing the bike/pedestrian path on the north side of the bluff along the 101-freeway corridor makes sense and preserves recreational activities for cyclists, surfers, paragliders and hikers. This can be a win-win situation. If we spend half the time developing a plan for Option # 4 rather than wasting time, money and efforts on the over complicated, over engineered, and ridiculously costly currently proposed Rincon Trail plan. Our community, including wildlife and fauna will thrive rather than run from the concrete jungle. We need to keep the coast and the bluffs of Carpinteria California open, undeveloped, and undisturbed to all the public for future generations to recreate and enjoy.

I37-6

Thank-you for the opportunity to respond. Please include this letter in the Draft EIR Public Comments.

I37-7

Respectfully Submitted,

George Jimenez

April 26, 2021

Response to Comment Letter I37

George Jimenez

April 26, 2021

- I37-1** The City acknowledges the comment as general opposition to the project. No further response is required.
- I37-2** The comment expresses concern regarding loss of paragliding opportunities above the site as a result of the project.
- Please see Global Response GR1.
- I37-3** The comment provides background on paragliding and identifies the uniqueness of the project site with respect to the soaring opportunities it currently affords.
- The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.
- I37-4** The comment expresses concern regarding loss of paragliding activity as a result of the project.
- Please see Global Response GR1. The City acknowledges the comment and notes that it expresses opposition for the proposed project but does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I37-5** The comment provides background on the County's efforts to increase recreational activities, referencing the existence of grant funding to increase recreational activities, and expressing the opinion the project would take away paragliding opportunities over the project alignment.
- Please refer to Global Response GR1. The City acknowledges the comment and notes that it does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.
- I37-6** The commenter expresses general support for Alternative 4. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I37-7** The City acknowledges the comment and notes that it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required or provided.

I am writing as a member of the Santa Barbara Soaring Association and part of the paragliding community. I am writing asking (pleading!) that you chose a bike path plan that will not destroy our flying site at Bates/Rincon. The change of the face to a 1:1 slope, the inclusion of a wide (18ft?) path, and the removal of vast amounts of dirt will permanently destroy our flying site. While “wind experts” have weighed in on thus there has been no contact made with pilots who actually fly there or the SBSA. I can tell you from experience that the changes proposed in the main plan will destroy our flying site. For that reason I urge you to build the path on the freeway side of the hill for that brief distance. We in the SBSA are in favor of the bike path and would love to see it put in. But please, do not do this at the cost of destroying one of the most amazing flying sites on the California Coast. This will be devastating loss, not only to our community but to the literally thousands of people who travel to Carpinteria to fly the site and the income they bring to the region.

I38-1

Thank you. Please do not hesitate to contact me if you have any questions.

[Mark](#)

Mark Rayburn Patterson, PhD

Response to Comment Letter I38

Mark Rayburn Patterson, PhD
April 26, 2021

- I38-1** The comment expresses general opposition to the project and support for Alternative 4. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.

Hello,

I just wanted to add my comments about the bike proposed bike path on Rincon bluffs.

We in the flying community have hopefully made it clear by now that the initial bike path proposal is anathema with free flight. It takes away opportunity for flight while at the same time giving cyclists and pedestrians a poorly designed path for their uses.

Nobody wants a bike path that routes directly through a busy parking lot. Not cyclists, not pedestrians, not pilots.

Nobody wants a bike path that is going to unnecessarily remove massive amounts of earth from the bluff face, all for a few more ocean views and way more engineering requirements.

Over 2,000 people, myself included, have signed a petition to save this cherished bluff face. Please see that this is an incredibly important issue that both locals and visitors alike care about.

Option #4 that has been proposed is by far our preference in the flying community, since it is routed on the north side of the slope and avoids the parking lot for cyclists while also preserving the southern bluff face.

The cursory wind study that was done is inaccurate and needs to be reassessed by real experts in the field.

This is just a special bluff face. It must be protected! Please help us protect it!

-Derek Musashe

I39-1

I39-2

I39-3

I39-4

Response to Comment Letter I39

Derek Musashe

April 26, 2021

- I39-1** The comment expresses general opposition to the project, indicating it will impact free flight opportunities, that cyclists will need to traverse a parking lot to connect to the regional trail system to the south, and that massive volumes of earthwork would be required.
- Please refer to Global Response GR1 for discussion of the air flow analysis and alterations to soaring opportunities from project implementation. Please refer to response to comment I35-4 (above) for discussion regarding the traverse of the Rincon Beach County Park parking lot by cyclists. Please refer to Global Response GR2 for discussion of earth form modification.
- I39-2** The comment expresses general support for Alternative 4. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I39-3** The commenter expresses concern regarding the accuracy of the wind study.
- See Global Response GR1.
- I39-4** The commenter asserts the bluff face is special and must be preserved. The City acknowledges the comment and notes that it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. No further response is required or provided.

Good afternoon Mr. Nick,

First and foremost we appreciate the work that has gone into planning this bike trail, but want to see it improved.

I 140-1

I am devastated that the Draft EIR considers the impact to my flying recreation to be 'insignificant'

I 140-2

I signed a petition to preserve Bates Ridge that has 2,000 signatures and over 60 comments.

I 140-3

I fully agree with the Environmental Review Committee's decision to recommend Alternate 4, building on the North side of Bates ridge, preserving the soaring recreation.

I believe building a bike path on the North side of Bates bluff is best for all recreational users, it is a safer, more direct path for cyclists, giving them a path that avoids the crowded, steep, and dangerous Rincon parking lot.

I 140-4

I am a cyclist and want a direct route on the North side, rather than an Ocean view. Seeing the Ocean shouldn't be a requirement for this project because I get plenty of views along the way like the whole bike path to Ventura.

I am concerned the current plan will require maintenance against rising seas as it is being built near an eroding seawall. Relocating to the other side of the ridge is financially responsible.

I 140-5

I appreciate the wind study done by the engineers, however, this study specifically states that it is based on theory and not intended for this purpose. Even if accurate, 20-30% loss of lift is very significant to me, especially on average wind days where lighter wind flow will be exponentially impacted by this project.

I 140-6

I feel it's inappropriate for the EIR to discuss free flight rules or launches, this is outside the scope of the document and project, the focus of the EIR and CEQA is preserving recreation at the project site.

I 140-7

I don't understand why the City continues to brush me aside and has failed to reach out to the soaring community. There are inaccurate statements in the Draft EIR because the authors refuse to listen to the pilots who have been recreating at Bates for over 40 years. Let's build a better path together.

I 140-8

Coastal soaring at Bates makes Carpinteria truly special and unique, I can bike almost anywhere, but I travel to Carp for the flying at Bates and spend my money there.

I 140-9

Thank you very much.

Kindest regards,

Morgan Granier

Response to Comment Letter I40

Morgan Granier

April 26, 2021

- I40-1** The commenter expresses appreciation to the City regarding planning a new bike path but would like to see improvements.
- The City acknowledges the comment as an introduction to comments that follow. No further response is required.
- I40-2** The comment expresses concern that impacts to recreation associated with the proposed project were determined to be insignificant in the Draft EIR.
- See Global Response GR1.
- I40-3** The commenter references a petition to preserve the site. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I40-4** The commenter expresses general support for Alternative 4. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. The City and County will be determining what approval action to take with the benefit of the environmental review contained in the EIR. No further response is required or provided.
- I40-5** The commenter expresses concern regarding eroding seawalls and rising sea levels, and states that Alternative 4 is more financially responsible
- See response I22-6, above.
- I40-6** The commenter expresses concern regarding the accuracy of the wind study and believes that 20-30 percent loss of wind should be considered significant.
- See Global Response GR1.
- I40-7** The commenter feels that it is inappropriate for the EIR to discuss flight rules or launches, and states the focus of the EIR should be to preserve recreation.
- See Global Response GR1.
- I40-8** The commenter states that the City has failed to reach out to the soaring community, resulting in inaccurate statements in the Draft EIR.
- The City acknowledges the comment and notes that it does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The City has received a number of comments from the soaring community on the project's Notice of Preparation and has accounted for these comments in the preparation of the Draft EIR. Therefore, no further response is required or provided.

I40-9

The commenter explains the uniqueness of the project site with respect to the soaring opportunities afforded by existing conditions within the project alignment.

The City acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Therefore, no further response is required or provided.

Dear Sirs,

Coastal soaring at Bates is unique and special for my family and i as we visit from out of town especially to enjoy the beach and the paragliding. We typically visit for a few days and stay in local hotel accommodations and also enjoy dining out at all the local restaurants. If it was not for the paragliding at Bates we would not visit.

Pls preserve this unique soaring site.

Yours sincerely,

Derek Arculli

I41-1

Response to Comment Letter I41

Derek Arculli
April 26, 2021

- I41-1** The comment expresses general opposition to the project. The City notes that the comment does not raise any issue concerning the adequacy of the Draft EIR. No further response is required or provided.

Verbal Comments Presented During Environmental Review Committee Hearing on Draft EIR

April 13, 2021

The Carpinteria Environmental Review Committee (ERC) held a public meeting specifically to discuss the Draft Environmental Impact Report on April 13, 2021. The minutes from the ERC meeting are provided on the following pages.

The minutes reflect three different categories of verbal testimony at the meeting:

- (1) Questions presented by ERC members regarding the project or environmental analysis
- (2) Comments from members of the public on the project and on the adequacy of the environmental analysis
- (3) Comments from the ERC members on the adequacy of the Draft EIR

For the first category (1), staff provided answers in real time at the meeting to ERC member questions that are considered adequate, and which are captured in the minutes. No further responses are necessary or have been provided in regard to answering ERC questions.

For the second category (2), verbal comments presented during the meeting reflect the same content as written comments on the Draft EIR submitted by these individuals. Detailed responses to written comments submitted by these individuals are provided in the immediately preceding sub-section of this chapter and are considered adequate to address both submitted written comments and the verbal comments delivered during the ERC meeting.

Responses to ERC member comments (3) are provided following the ERC meeting minutes.

**Carpinteria Rincon Trail
Draft Environmental Impact Report**

**Environmental Review Committee Minutes
April 13, 2021
4:00 p.m. Virtual Meeting (Zoom Webinar)**

The meeting was called to order at approximately 4:00 p.m. by Steve Goggia, Chair.	
ROLL CALL	
Members present:	Steve Goggia, Chair John Ilasin Natasha Lohmus Vince Semonsen Erin Maker
OTHERS PRESENT:	Nick Bobroff, Principal Planner Matt Roberts, Project Applicant Scott Onishuk, Project Engineer Jonathan Leech, Environmental Consultant Mack Carlson, City Attorney's Office
Approximately 40 members of the public were in attendance.	
PUBLIC COMMENT ON ITEMS NOT ON THE AGENDA	
None	
PROJECT PRESENTATION	
Nick Bobroff and Jonathan Leech described the public review process, provided an overview of the project description, and disclosed the findings of the Draft Environmental Impact Report (DEIR), including all of the identified potentially significant impacts and proposed mitigation measures. The project alternatives considered as part of the DEIR were also described and a brief analysis of their respective impacts compared to the proposed project was provided.	
ERC MEMBER QUESTIONS	
Erin Maker	
<ul style="list-style-type: none">• Who will be responsible for maintaining the various elements of the trail, including but not limited to storm drains and drain outlets?<ul style="list-style-type: none">○ Staff explained that the details of a City-County Maintenance Agreement are still being worked out, but the proposed arrangement is that the County would be responsible for the bridge structure and the City responsible for the bridge/trail surfacing. For the storm drains, Caltrans would continue to be responsible for maintaining their existing storm drain facilities; the County would take on responsibility for the new outlets on County Parks property.• Where will the storm drain filters be installed? We don't want them to be located somewhere that would allow them to be clogged with sediments.<ul style="list-style-type: none">○ Staff clarified that the filters would be installed in inlets just off the shoulder of the trail.• What is the status of the project proposed for the Bluffs III parcel where the soaring participants launch from?<ul style="list-style-type: none">○ Staff explained that a proposal for a private campground/resort was recently considered at a	

conceptual level by the Architectural Review Board, Planning Commission, and City Council at a joint conceptual review meeting.

- Requested information about the project costs for the proposed project and the project alternatives; asked if any one of the alternatives was most cost-effective.
 - Staff explained that Alternative “2” was abandoned due to challenging construction conditions related to unstable geologic conditions, and a need for significant retaining walls. The costs of these challenges made this Alternative likely financially infeasible. The proposed project was anticipated to be far less expensive to build, on the order of \$1-2 million less, despite requiring more earthwork than Alternative “2.” Alternative “3”, by further reducing earthwork, would save additional money as compared to the proposed project. Alternative “4” is expected to be more expensive due to its increased length, more grading, more concrete, and more retaining walls. Staff cautioned, however, that construction costs were not a significant factor in developing project alternatives; instead developing the best facility for the community was the main driver in designing the project alternatives.

Natasha Lohmus

- Will the exposed drainage outlets be placed at the beach elevation or will there be a vertical drop to the beach from the outlets, which could create erosion? She noted the existing drainages all have created erosional features. She asked if any energy dissipation features would be installed.
 - Staff answered that the new and replaced outlets are intended to have a 90° outlet at the beach elevation and would be protected with rock rip-rap or similar at the outlet.
- Where do the soaring participants launch from relative to the project site?
 - Staff explained that the pilots launch from an area on private property to the southwest of the trail alignment, and confirmed that the trail would have no impacts on the launch area.
- In Alternative “4,” if the bridge were rotated toward the highway, could the earthwork be modified to bring the trail up to the bridge deck elevation rather than directing the bridge/trail out toward the ocean and then having to swing back in toward the highway, and impacting the use of the ocean-side ridge for soaring? She did not feel that preserving ocean views from the trail was critical, and expressed more concern for impacts to soaring activities and the negative economic effects of such impacts to use of the area by the soaring community.
 - Staff responded that there are a number of problems, including existing utility infrastructure, which make such an alternative alignment problematic. In addition, one of the primary project objectives as identified in the EIR was to preserve ocean views from the new trail.

Vince Semonsen

- What is the anticipated duration of the construction effort? Will construction extend through a rainy season? He is skeptical of any Best Management Practices (BMPs) that would be sufficient to protect exposed soils given the extensive amount of earthwork anticipated on a steep slope during heavy winter rain events. The restoration/revegetation effort will also be exposed to winter rains/erosion.
 - Staff answered that the project is expected to take approximately 24 months to complete.
 - Staff added that the project will be operated in 2 separate grading operations, one above the UPRR corridor and one below. The earthwork area above the UPRR corridor will be able to utilize the existing, established storm drain system for capturing and diverting runoff. On the ocean side of the UPRR corridor, careful and thorough erosion control will be more critical and will need to be timed to occur outside of winter, if possible. The Las Positas bike path project in Santa Barbara was cited as an example of how projects can be completed during winter with appropriate BMPs in place.
- He questioned the efficacy and reality of the woodrat and legless lizard relocation efforts given the challenging terrain. Relocating the woodrat middens seems unlikely; the woodrats are likely to run away

- when their nests are disturbed.
- He questioned whether the finding of a 30% reduction in air currents relied upon by the soaring enthusiasts was accurately classified as “less than significant.”
 - Staff clarified that the impact was identified as being up to a maximum of a 30% reduction, and that based upon the range of suitable wind conditions that allow for soaring opportunities, soaring opportunities within the suitable wind range would remain albeit at this reduced level. It was also clarified that the environmentally superior alternative (Alternative “3”) was found to result in closer to a 20% reduction, and this in part, was why this Alternative was found to be environmentally superior.
 - Why does Alternative 4 increase the amount of earthwork compared to the proposed project?
 - Staff confirmed this was correct and explained that the slope above the highway would need to be modified and re-worked for the entire length east of the UPRR crossing to create the new trail bench. Additionally, the Alternative 4 trail is considerably longer in length. It was also clarified that this Alternative requires retaining walls above and below the trail for a stretch towards the eastern end.
 - Was there a previous Alternative that contemplated using the existing freeway bridge or attaching to the freeway bridge to cross the tracks and continuing the trail along the highway shoulder?
 - Staff responded that it was looked at early on but found to be infeasible due to the cost and constructability challenges with adding onto, or attaching a new bridge to the existing freeway overpass above the UPRR alignment. Matt Roberts clarified that Caltrans did not support such an option for further consideration and wanted to see a completely independent bridge structure for the trail to cross the railroad alignment. The proposed Alternative 4 is an attempt to retain some ocean vista views, and make use of a shorter bridge span. It also makes use of the work already completed with the California Public Utilities Commission (CPUC) with respect to gaining approvals and easements for the rail corridor crossing.
 - He questioned the importance and emphasis given to providing or maintaining coastal views for this short trail segment given the availability of coastal views for the remainder of the trails to the north and south of the trail. He found it hard to justify in light of the amount of earthwork necessary to accommodate a trail with a continuous ocean view.
 - Matt Roberts clarified that Alternative 3, the environmentally superior alternative, requires less earthwork than the proposed project while still meeting the project objectives of providing an ocean vista trail.
 - How much earth removal would occur in Alternative “4”?
 - Anticipating ~94,100 cubic yards of export (i.e., earth removal).
 - In the Alternative “4” scenario, could the bridge be turned to be parallel, or closer to parallel, to the freeway to create a shorter bridge?
 - Staff replied that the current bridge design, which is nearly perpendicular to the railroad tracks, is the shortest crossing of the rail corridor (at ~160’ in length). Staff clarified that various alternatives have been examined in an effort to minimize the bridge spans and needed earthwork. Alternative “4” as shown also fits other project constraints related to easements, rights-of-way, construction staging, etc. At 160’ length, we are reaching the maximum length that can be accomplished with a clear span bridge. There were no significant constructability benefits observed from rotating the bridge.
 - In the Alternative “4” scenario, none of the earthwork shown in the renderings on the ocean side of the bluff would occur, correct? Then where would the 94,000 cubic yards of net export come from in Alternative “4”? He asked to see a rendering or similar exhibit showing where the earthwork quantities would be coming from.
 - Staff explained that the numbers are accurate having been determined using highly detailed models of the project area, and that the earthwork is necessary to create a trail bench along the

entire length of the ridge.

John Ilasin

- He asked to hear from the project design team in response to some of the questions raised by the other ERC members.

Steve Goggia

- In Alternative “4”, could the trail be placed on top of the ridge instead?
 - Staff explained that at the bridge crossing, the bridge is near the same elevation as the freeway. In order to run down the ridgeline towards Bate Rd, the bridge would have to be increased in height 40 feet which would in turn result in a much longer bridge (current 160’ bridge expanded to 250’+ bridge length) with much more significant visual and construction impacts.
- In Alternative “4”, does the trail need to still be 16 feet wide? Could it be narrower if it were higher up on the ridge if it didn’t need to carry so much of the uphill slope?
- Any chance of using something like an ADA-compliant spiral ramp to gain the necessary elevation to reach the ridge?
 - Staff replied that such a feature would not meet the design criteria for a trail or bike path, nor would it seem to fit the physical setting.

PUBLIC COMMENT

John Greynald

- The study is flawed and it will be easy for the soaring community to demonstrate the failings of the study and the attempts to delegitimize the recreational impacts to the soaring community.
- Believes the analysis with respect to recreational impacts is illegal.
- Disagrees with the conclusion that a 30% reduction in wind velocities is less than significant.
- Nobody from the project team attempted to contact or consult with the soaring community.
- Believes the wind study is flawed and incomplete.
- Alternative 4 is the only viable option that could be permitted. Stop wasting the taxpayers’ money on studying other project alternatives.

Karl Cameron

- There hasn’t been much erosion on the ocean bluff face over the last 20 or 30 years based on personal observations, except in the areas near the failing retaining walls.
- Believes the wind study is incomplete and flawed. A 30% reduction in lift would have a drastic impact on the flying conditions.
- The soaring community has been exploring additional options for launch sites along the buffs, in addition to the existing launch site on the “King” property.
- The soaring community was not opposed to the original project alignment (now referred to as Alternative “2”), however they believe Alternative “4” is a better alternative because it delivers cyclists to the continuation of the bike path south of Bates Rd and doesn’t have any impacts to the ocean-facing bluff face.
- Asserts that they soaring activities are fully legal and sanctioned to fly in the area.
- Requests that the design team consult with and engage the soaring community in the design of the trail.

Ottis Gillespie

- What is the difference between the described “earthwork” and “earth removal” in the DEIR?
 - Staff explained that “earthwork” is a general term for cut and fill, whereas “earth removal” refers specifically to excavation or cut. Projects balance onsite wherever possible.

- Please provide more details on the anticipated retaining walls in Alternative 4 (length, height, etc.). It doesn't seem this would be a major obstacle to pursuing this Alternative.
- The existing storm drains are not in good condition. The depiction of the existing and proposed storm drains is inaccurate since these "existing" storm drains need to be repaired/replaced.
- In addition to natural erosion, there has also been mechanical intrusion into the asphalt along the existing bench. Provide close-up photos/images of what this bluff would look like.
- Alternative 4 is the best option. It would not deliver cyclists at speed into the Rincon Beach County Park parking lot, which would be a significant safety issue. Cyclists won't slow down just because they're exiting the trail and entering a parking lot.
- Disagreed with the finding of no significant impact on soaring activities. The important element at this site is less about the wind velocity and more about the wind deflection from the bluff causing ridge lift. Alterations that affect that ridge lift will disrupt our ability to fly at this site. Refer to the video submitted by Aaron LaPlante during the public comment period on the previous Subsequent Mitigated Negative Declaration (SMND).
- Surveyed more than 100 cyclists asking whether they would prefer a path on the ocean side or inland side of the trail considering wind exposure.

Dr. Mark Patterson

- Appreciates the complexity of the project.
- Discounts the findings of the wind study, noting that even minor features or changes can affect the wind and uplift conditions dramatically. Comparatively, laying back the existing steep slope to a 1:1 slope will have a significant impact on flying conditions. Asked whether the wind expert has any flying experience?
- Recommended the project team consult with the experts from the Santa Barbara Soaring Association; they are the local experts of flying at this location. It doesn't matter what experts say about wind over hills; talk to the people who actually fly the hills.
- This project would not affect the launch area, however we rely on the ocean-facing bluff face where the trail is proposed to be located to catch lift and continue with our flights. The bluff orientation, slope angle, and smoothness all factor into this, and if you change any of these features, it will ruin our flying conditions.
- There is a safety consideration too. This is a great beginner site because it doesn't require much wind. The proposed changes would make it flyable only during periods of higher wind speeds which would make it less safe for less experienced pilots. It would increase the potential for injuries, crashes, and landings on the bike path.
- Prefer Alternative "4" to finish the bike path while preserving our ability to continue to fly here at this site.
- Alternative "4" also avoids delivering cyclists into a busy parking lot.

George Jimenez

- Agree with many of the comments from the others.
- The project is being promoted as improving safety, but no reports or statistics on bike crashes or incidents along the existing Caltrans shoulder have been provided to demonstrate a need for the trail. There have, however, been incidents with cyclists crashing into the non-compliant parking in the County Beach parking lot.
- Asked why is it okay for the public to cross the railroad tracks in other parts of town, but not here?
- The wind study incorrectly looks at wind velocity rather than uplift.
- Why hasn't the City explored any other routes or possibilities? Explore other options and do a better study of other possible options.

Barry Remis, COAST and SB Bicycle Coalition

- Appreciates the examination of project alternatives.
- We believe the primary objective is to create a multi-use trail to allow improved pedestrian access and bridge a gap in connectivity. Therefore, we believe Alternative “4” is best as it provides a direct connection to the continuation of the bike path south of Bates Rd.
- Pedestrian and cyclist safety concerns in passing through the County Beach parking lot are considerable.
- Avoidance of wind for cyclists through Alternative “4” could be preferable.
- Alternative “4” best meets the ultimate project objective with the least amount of exposure to risk to trail users.

Jeff Longcor

- Members of the soaring community are deeply concerned about this project. We’re feeling marginalized by findings of “less than significant” impacts to our soaring activities. Nobody has taken a realistic approach to the wind, or taken the opportunity to consult with us.
- Santa Barbara Soaring Association (SBSA) previously refuted language in the SMND concerning our rights to use these areas and alleged violations of rules, and continue to disagree with this language being used in the DEIR.
- SBSA disputes raising issues over the long-term viability of the launch site. There have been allotments for the soaring community in the past and they can launch from elsewhere along the bluffs to arrive at the ridge, if needed.
- Pilots can only continue to enjoy our flying if the existing ridge is maintained and not altered.
- The soaring community submitted over 100 pages of comments in the appendices. The ERC should read the comments.
- The soaring community has a petition with over 2,000 signatures and 60 comments in support of protecting this ridge, including many visitors from outside of the community.
- This is an excessive amount of construction and earthwork for a 0.2-mile trail and would destroy the existing important soaring opportunities.
- If “recreation” exists under CEQA, then it needs to be considered. Based on the expert testimony provided by the soaring community on record, the described impacts should be found significant.
- The expert wind study is unrealistic. It only deals with a parallel wind path which doesn’t reflect the site conditions, which hits at a tangent.
- If wind speed is reduced even just a little bit, there is an exponential decrease in lift. When wind is light, we can only fly along this ridge.

COMMITTEE MEMBER COMMENTS

Natasha Lohmus

- Concerning the proposed mitigation measures for the legless lizards and woodrats, perhaps consider some alternative options that would be easier and more realistic to accomplish.
- For bird nesting, the mitigation measure should require compliance with state and federal regulations (e.g., 300’ buffer from an occupied nest; 500’ for raptors) for noise-producing construction activity and heavy equipment use.
- Where would off-site mitigation occur? Can receiver sites be identified or proposed?
- For hydrology, concerns with impacts from concrete need to be addressed. Wet concrete is highly hazardous to wildlife. If concrete will be poured during the wet season, it should have a quick drying additive. Provide guidelines for when and how concrete will be poured for trail surfaces and v-ditches to avoid runoff-related impacts.
- Enhanced and more detailed explanations of proposed measures to address erosion during the rainy season are needed.

- Comments provided by the public have a lot of value. I support the idea of constructing a coastal trail, but it should not come at the expense of eliminating another group's recreational use of the area, especially a group that contributes to the local economy through tourism dollars. The financial benefit of preserving the soaring community's use of the area should be considered and addressed in the environmental document.
- Identified impacts to recreational use by the soaring community are significant. More analysis/work is needed on this section.
- If Alternative "4" is more expensive to build, perhaps additional grants can be pursued to help cover construction costs.

John Ilasin- No additional comments.

- Mr. Ilasin recused himself from further participation or voting on the Draft EIR, citing a potential for a conflict of interest due to his role in administering capital projects, including the subject project, on behalf of the City of Carpinteria.
 - Mack Carlson, legal counsel for the City of Carpinteria, agreed and recommended Mr. Ilasin abstain from any votes on the project.

Erin Maker- No additional comments.

Steve Goggia

- Acknowledged that ERC members would like to see additional information and details about Alternative "4". Asked the other ERC members if they would need additional information on Alternative "4" before making a recommendation on the EIR, or if sufficient information has been provided.
 - Vince Semonsen responded that he believes the current document provides sufficient information, although he would like to see a graphic depicting the earthwork for Alternative "4."
 - Mack Carlson, legal counsel for the City of Carpinteria, clarified the options that the Board could pick from concerning how to take action on the Draft EIR. The Board could direct staff to provide additional details on any of the project alternatives, and/or request a continuance to present that additional information back to the ERC at a subsequent meeting. The Board could also direct staff to reformulate one of the Alternatives, which would then need to be evaluated to determine whether it would trigger a need to recirculate the Draft EIR. Lastly, the Board could make a recommendation to the Planning Commission to accept the EIR based on one or more of the project alternatives presented.

Vince Semonsen

- He noted a preference for Alternative 4 due to its avoidance of the ocean-facing bluff and impacts to the soaring community. He stated he does not trust the wind study prepared for the EIR.
- He felt Alternative "4" would move less soil than the other options and avoided exposed steep slopes on the south-facing side of the ridge that would be prone to storm damage. He did not feel that any BMPs would be adequate to protect the slope from this type of damage.
- Agreed with public comments concerning the safety risks of depositing cyclists into the parking lot. He felt cyclists would prefer the ability to continue directly on to the continuation of the bike path at Bates Rd rather than having to pass through the parking lot. In particular, he felt that electric bikes pose a hazard due to their high travel speed if passing through the parking lot.
 - Natasha Lohmus expressed her agreement with this, noting that the lot is often busy during summer months and cyclists would be exposed to potential injury or accidents. She also asked how enforcement of the prohibition on motorized bikes would be enforced.
 - Matt Roberts explained that the design had been reviewed by a traffic engineer and found to not pose unreasonable safety hazards. He added that traffic calming improvements would be included

at the trail ends to warn cyclists of the changing traffic patterns. He also clarified that motorized bikes would not be legal on an un-motorized trail, and many agencies are beginning to establish speed limits on trails for these sorts of reasons. Mr. Roberts explained that enforcement would likely come through financial responsibility in the event of an accident along with periodic enforcement of regulations (e.g., citations).

ACTION:

Motion 1 by Committee member Lohmus, seconded by Committee member Semonsen, to recommend revisions to the Draft Environmental Impact Report to address the Committee's comments, recommendations, clarifications, additional mitigation measures and corrections, including providing additional project details for Alternative "4".

Motion 2 by Committee member Semonsen, seconded by Committee member Lohmus, to recommend approval of the Draft Environmental Impact Report to the Planning Commission with a preference for Alternative "4" and an understanding that the previous motion's comments would be incorporated into the EIR.

VOTE:

Motion 1: 4-0 (Ilasin abstain)

Motion 2: 4-0 (Ilasin abstain)

MEETING ADJOURNED: 6:40 p.m.

Response to Verbal Comments Presented During Environmental Review Committee Hearing on Draft EIR

Response to **Natasha Lohmus** Comments

- Legless Lizard/Woodrat relocation – the identified methods have been successfully used on other projects, CDFW did not recommend alternative methods.
- Nest construction activity setbacks - Refer to revisions in the Biology Section; the 300 foot and 500 foot radii for nests are included.
- Off-site mitigation – Rincon Bluffs (City) and Rincon Beach Park (County) are immediately adjacent to the project and would represent off-site mitigation opportunities, as necessary.
- Impacts from concrete construction on biology – the prevention of impacts from concrete construction are addressed in MM-WAT-2 in the Hydrology and Water Quality Section of the EIR
- Erosion control – MM-WAT-3 requires the preparation of a detailed Erosion and Sediment Control Plan, to be based upon the final earthwork design. Sample erosion control techniques, measures, and equipment are identified in MM-WAT-3, but the final erosion control plan will be designed to specifically address the earthwork design and erosion control needs.
- Financial benefits of preserving soaring opportunities – the CEQA guidelines do not require the evaluation of the financial impacts of a project.
- Recreation impacts – Please refer to Global Response GR1 with respect to project impacts on soaring opportunities.
- Alternative 4 Costs – this comment does not address the adequacy of the Draft EIR; no response is necessary.

Response to **John Ilasin** Comments

- This comment does not address the adequacy of the Draft EIR; no response is necessary.

Response to **Steve Goggia** Comments

- Sufficiency of information Regarding Alternative 4 – Vince Semonsen proffered the opinion that the existing Draft EIR provides adequate information addressing Alternative 4 to the Proposed Project. The EIR preparers agree with the opinion expressed by Mr. Semonsen.
- The legal direction provided by Mack Carlson clarified the actions available to the ERC with regard to requesting the inclusion of further analysis, or a recommendation to the Planning Commission pertaining to the acceptance of the Draft EIR.

Response to **Vince Semonsen** Comments

- Legless Lizard/Woodrat relocation – (from the ERC Questions section) the identified methods have been successfully used on other projects, CDFW did not recommend alternative methods.
- Alternative 4 Preference – the commenter is correct that Alternative 4 would avoid modification of the ocean-facing bluff south of the UPRR corridor. Please refer to Global Response GR1 for further discussion pertaining to the wind study prepared for the EIR.
- Alternative 4 Minimization of Earthwork – The commenter is not correct in identifying Alternative 4 as involving the least amount of earthwork of all the project options. Alternative 3 would have the least total earthwork volume of all the options explored (including the proposed project and Alternative 1-4). MM-WAT-3 requires the preparation of a detailed Erosion and Sediment Control Plan, to be based upon the final earthwork design. Sample erosion control techniques, measures, and equipment are identified in MM-WAT-3, but the final erosion control plan will be designed to specifically address the earthwork design and erosion control needs.

- Bike Safety Within Rincon Beach State Park Parking Lot – The City requested their professional consulting traffic engineer evaluate the potential for safety risks associated with the conflict between cyclists entering the Rincon Beach County Park from trail segments connecting to the parking lot from the east or west. The traffic engineer concluded that the proposed design configuration which would convey cyclists through the parking lot would not pose substantial safety risks from conflicts between cyclists and maneuvering vehicles. Parking maneuverers tend to be low speed, visibility is good in the parking lot, and signage warning cyclists and motor vehicle operators would be effective in eliminating potential safety risks.

References Cited

- Bowen, A. J., & Lindley, D. (1977). A wind-tunnel investigation of the wind speed and turbulence characteristics close to the ground over various escarpment shapes. *Boundary-Layer Meteorology*, 12(3), 259–271.
- Bowen, A. J. (1980). Full scale measurements of the atmospheric turbulence over two escarpments. In J. E. Cermak (Ed.), *Wind Engineering* (pp. 161–172). Pergamon.
- Crawley, E. F., & Schmanske, M. (1994). Optimum ridge lift: a scaled experimental investigation. *Technical Soaring*, 18(4), 120–128.
- El Bahlouli, A., Leukauf, D., Platis, A., zum Berge, K., Bange, J., & Knaus, H. (2020). Validating CFD Predictions of Flow over an Escarpment Using Ground-Based and Airborne Measurement Devices. *Energies*, 13(18), 4688.
- Pagen, D. (1992). *Understanding the Sky* (1st ed.). Sport Aviation Publications.
- Pagen, D. (2001). *The Art of Paragliding* (1st ed.). Sport Aviation Publications.
- Safaei Pirooz, A. A., & Flay, R. G. J. (2018). Comparison of speed-up over hills derived from wind-tunnel experiments, wind-loading standards, and numerical modelling. *Boundary - Layer Meteorology*, 168(2), 213–246.

3 Changes to the Draft EIR

3.1 Introduction

The comments received by the City of Carpinteria (City) during the public review period for the Draft EIR included information that has resulted in minor revisions to the text of the Draft EIR. These revisions are shown below and are categorized by section number. Text from the Draft EIR that has been removed is shown in strikethrough (i.e., ~~strikethrough~~), and text that has been added as part of the Final EIR is shown as underlined (i.e., underline). Revisions are shown with surrounding sentences or paragraphs for context. These errata merely clarify and correct minor facts and do not constitute “substantial revisions” requiring recirculation of the Draft EIR, as set forth in CEQA Guidelines, Section 15073.5.

The engineering design of the Project has also been refined since the Draft EIR, resulting in two notable revisions to the overall Project. First, the previously proposed bench along the slope above the trail has been removed from the design for the trail segment south of the UPRR alignment. Second, the number of vertical storm drains serving the trail south segment of the UPRR alignment has been reduced from a total of 5 to 4. Revisions to the Draft EIR language to reflect these Project refinements are also included in the Errata section below.

3.2 Errata

2.7 Project Description

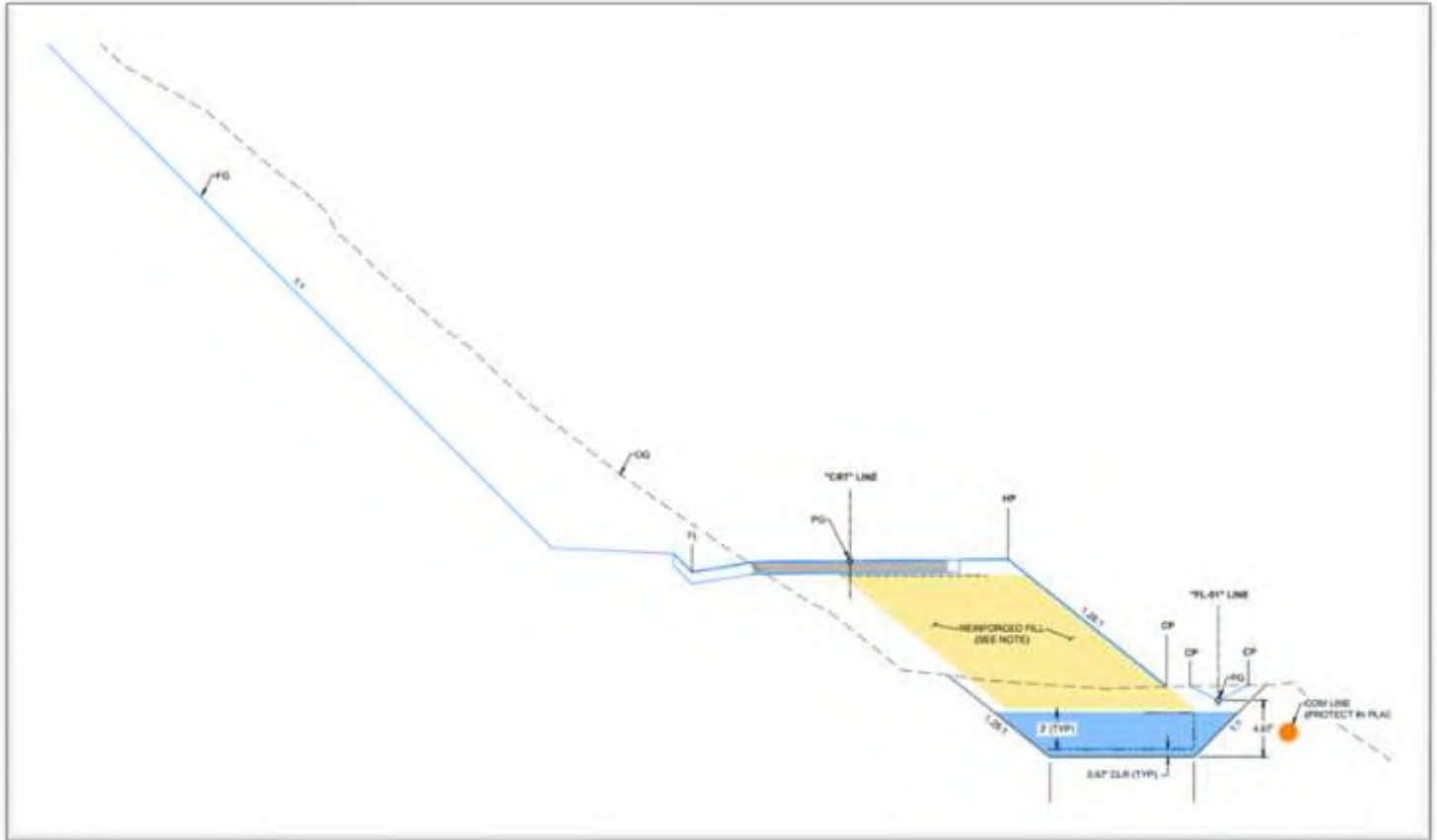
2.7.1 Earthwork

The trail design has been engineered to incorporate pathway travel slopes that are consistent with ADA standards. The design also avoids an area with deep landslides, south and west of the crossing point over the UPRR alignment, which were identified in geotechnical testing. The majority of project earthwork will occur on existing engineered slopes that were constructed as part of past road, highway and railroad projects; these manufactured slope faces in many instances are steeper than natural conditions, leading to increased erosion potential, which the project intends to correct through re-contouring to reduce slope angles. Construction of the proposed path design would involve a total of ~~107,386~~ 96,040 cubic yards of cut, a total of ~~14,860~~ 10,519 cubic yards of fill, and the export of a total of ~~92,526~~ 85,521 cubic yards of earth material. The re-contouring of existing engineered topography along the path alignment to achieve more stable conditions is described in more detail below

2.7.1.2 Pathway Slope Profiles South of UPRR Alignment

For the portion of the path on the ocean side of the UPRR alignment, the regraded slopes for the trail “bench” would employ cut slopes with a ratio of 1:1 above the trail, while a ratio of 1.25:1 would be employed for the “reinforced” fill slopes below the trail. The earthwork would alter the elevation of the bench on which the trail would be aligned, but would not alter the top elevation of the hill/ridge. Illustration 2-3 presents an example of the existing versus proposed slope profile for earthwork modifications above and below the trail.

Note in Illustration 2-3 that the proposed cut-slopes are less-steep than those constructed for the railroad alignment in this area (illustrated with a dashed profile labeled as “OG” above) in order to provide an adequate margin of safety for the long-term stability of the slopes. ~~Note there is also a proposed bench above the trail that would intercept rainwater and also prevent rock fall on the path below. The bench would also provide maintenance access for the manufactured slopes and path.~~



SOURCE: Bengal Engineering

Illustration 2-3 Pathway Grading Profile South of UPRR Alignment

2.7.3 Drainage

The proposed trail project includes an integrated storm drainage system to ensure stormwater runoff from the recontoured bluff face and the trail surface is conveyed to the ocean efficiently, avoiding potential erosion of slopes along the trail alignment. Along the portion of the trail north of the UPRR alignment, a concrete swale (v-ditch) would convey water along the trail edge, where it would be released into an existing surface drainage swale now serving U.S. Highway 101. This swale connects to an existing storm drain that crosses underneath the UPRR alignment, and then descends to the beach level. This storm drain is labelled as “1” in Illustration 2-6. No improvements are proposed to storm drain 1, and the trail storm drain volumes contributed to this storm drain would be negligible compared to existing flows already contributed from portions of U.S. Highway 101.

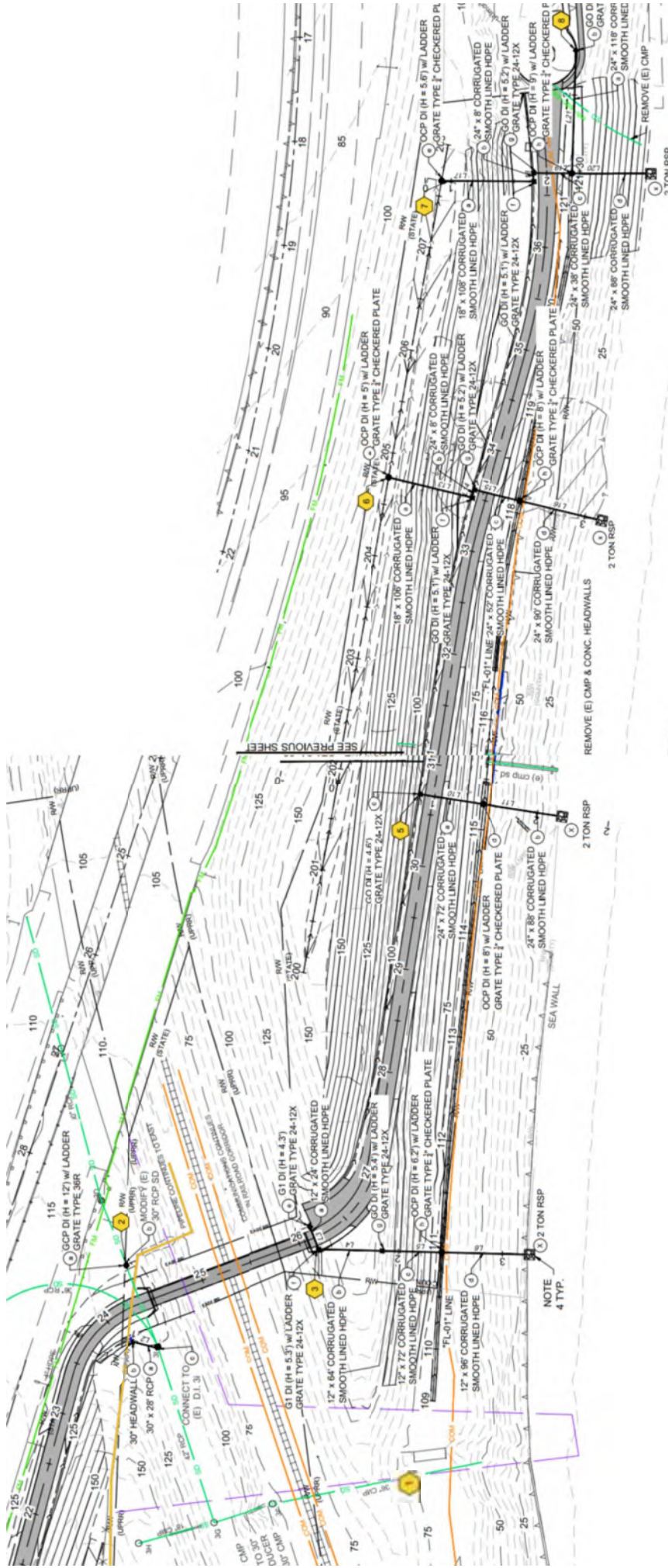


Illustration 2-6 Major Storm Drainage Components of the Project

(3) (5) (6) (7) – New Storm Drain With Beach Outlet

Existing Drain / Outlet to be Removed

On the south side of the UPRR alignment, a concrete drainage swale would also carry surface runoff from the recontoured bluff face and trail, conveying such drainage along the side of the trail until it reaches one of the storm drain inlets lower in elevation. A total of ~~5~~ 4 vertical storm drains would convey this stormwater from the trail to the beach elevation, for the trail segment south of the UPRR alignment (refer to Illustration 2-6). Drains ~~No. 3 and No. 6~~ (shown in light blue in Illustration 2-6) are existing, but are in seriously degraded condition and would be removed. ~~re-used, including rehabilitation of existing piping;~~ Drains No. ~~2~~ 3, No. ~~4~~ 5, No. 6, and No. ~~5~~ 7 (shown labelled in in Illustration 2-6) would be newly developed for the project.

Section 3.1, Aesthetics

- c) ***In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

The eastern portion of the proposed trail would involve regrading of the slope above the former UPRR track alignment, to include a fill slope below the new trail bench, and a cut slope with ~~mid-elevation bench~~ a less steep angle above the trail bench (Refer to ~~Appendix G~~ Illustration 2-6 for earthwork cross-sections/profiles illustrating the slope re-working). Again, the top elevation of the ridge within this segment of the trail alignment would not be modified and the overall area would continue to have the same general appearance as the existing condition (i.e., a manufactured slope along the original cut made for the railroad alignment).

The project also involves the construction of new vertical storm drains. As discussed in Section 2.7.3, the proposed storm drains would be installed during earth work for the trail and adjacent slopes, and would be buried to cross beneath the trail and then descend on the slope face to outlet at the beach elevation. Buried portions of the storm drain would be constructed of high-density plastic, transitioning to galvanized steel for the aboveground portions.

Due to the size of the proposed above ground components, the visibility of the above ground storm drain system would be minimal and would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Temporary adverse effects during construction due to the loss of mature vegetation would occur over a limited time period, given new landscaping and restoration of native plants are proposed as part of the project. The project would enhance area aesthetics via native landscape installations along the perimeter of the trail and ongoing landscape maintenance. Where feasible, the project would remove the invasive weeds along the proposed trail alignment that could suppress native plants. Native plants, once established, would live without need for supplemental water, helping to ensure their ongoing success. The reduction of slope angle (making the slope gentler) would slow water runoff, improve soil water retention, and support more extensive vegetation cover on the sloped areas, compared to existing conditions. Nonetheless, the project would have a potentially significant adverse impact on visual character or quality of the site and its surroundings because of the removal of mature vegetation and addition of new human-scale development. Therefore, impacts would be potentially significant. **MM-AES-1**, which requires County Board of Architectural Review, and **MM-BIO-5**, which requires restoration or enhancement of coastal sage scrub and coastal bluff scrub communities in areas temporarily impacted by construction of the trail or adjacent area, would be required. Impacts would be **less than significant with mitigation incorporated**.

Section 3.2, Air Quality

- b) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

For the analysis, it was assumed that heavy construction equipment would be operating five days per week (22 days per month) during proposed project construction. Construction worker and vendor trips were based on CalEEMod default assumptions and rounded up to the nearest whole number to account for whole round trips.

Proposed project construction would include ~~107,386~~ 96,040 cubic yards of cut, a total of ~~14,860~~ 10,519 cubic yards of fill, and the export of a total of ~~92,526~~ 85,519 cubic yards of earth material during the grading phase. It is anticipated that earth movement would be primarily, if not completely, accomplished using off-road equipment (e.g., scrapers and excavators). Off-road travel was assumed to be 1,000 feet per trip for vendor and haul trucks.

A detailed depiction of the construction schedule—including information regarding phases and equipment used during each phase—is included in Appendix B of this Environmental Impact Report. The information contained in Appendix B was used as CalEEMod model inputs.

Construction Emissions

Construction of the proposed project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emission can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. Therefore, such emission levels can only be estimated, with a corresponding uncertainty in precise ambient air quality impacts. Based upon the initial earthwork volumes calculated for the project (i.e., 107,386 cubic yards cut, 14,860 cubic yards fill, with 92,526 cubic yards of export), construction-related emissions were calculated using CalEEMod; Table 3.2-5 presents the estimated results of the calculated annual construction emissions generated during construction of the project on the basis of the initial earthwork estimates. Details of the emission calculations are provided in Appendix B. Given the reduction in the estimated earthwork volumes for the proposed project, construction emissions are expected to be lower than the levels reported in Table 3.2-5.

Table 3.2-5. Estimated Annual Construction Emissions

	ROC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Year	Tons per Year					
2022	0.14	2.50	1.03	0.01	0.24	0.10
2023	0.07	0.85	0.53	0.00	0.17	0.05
Maximum Annual Emissions	0.14	2.50	1.03	0.01	0.24	0.10
<i>SBCAPCD Threshold</i>	25	25	25	25	25	25
<i>Threshold Exceeded?</i>	No	No	No	No	No	No

Source: Appendix B.

Notes: ROC = reactive organic compound; CO = carbon monoxide; NO_x = oxides of nitrogen; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter

As shown in Table 3.2-5, based on the initial earthwork estimates, annual construction emissions would not exceed the SBCAPCD significance thresholds for ROC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} emissions during construction. Given the updated earthwork estimates for the proposed project are reduced as compared to the initial estimates, the construction emissions from the proposed project would also remain well below applicable significance thresholds of the SBCAPCD. Therefore, construction of the proposed project would result in a **less than significant** impact.

Section 3.3, Biological Resources

NOTE: The Biological Resources section below replaces the entire Section 3.3 of the Draft EIR, as minor revisions are distributed throughout the section and presentation of isolated paragraphs would hamper overall readability.

This section describes the existing biological resources conditions of the proposed Carpinteria Rincon Trail Project (project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and proposes mitigation measures to reduce potential impacts to a less than significant level. The following discussion is based on review of existing databases; field surveys performed in 2011, 2018, 2019, ~~and 2020~~, and 2021; knowledge of the project vicinity from previous biological surveys, consultations with local experts; and information from the Carpinteria Rincon Trail Proposed Final Mitigated Negative Declaration (MND) (City of Carpinteria 2015) and the Carpinteria Rincon Trail Final Subsequent MND (City of Carpinteria 2019) certified January 6, 2020.

3.3.1 Existing Conditions

The project is located on lands within the jurisdiction of the City of Carpinteria and the County of Santa Barbara (County) (Figure 2-1, Project Location). Carpinteria is a quaint seaside town located about 12 miles east of Santa Barbara near the intersection of Highway 150 and U.S. Highway 101, near the Ventura County line. The proposed trail alignment is located largely along an area of coastal bluff known as the Carpinteria Bluffs. As described in the City of Carpinteria General Plan/Local Coastal Land Use Plan & Environmental Impact Report (City of Carpinteria 2003), the Carpinteria Bluffs are among the last remaining coastal open space areas within the County and are a prime example of undisturbed California coastline. The Carpinteria Bluffs provide important public access to the coast for residents and visitors. The Carpinteria Bluffs are partially developed and further development or redevelopment of portions of the Carpinteria Bluffs are anticipated over time making the establishment of policies to protect the environment and character of the place of utmost importance.

The project site crosses several parcels of land owned by public agencies. The trail parking lot location on Carpinteria Avenue is owned by the City of Carpinteria. Heading east, the next portion of the proposed trail route is owned by the State of California as part of the U.S. Highway 101 right-of-way and from there the proposed trail route crosses two parcels of land owned by Union Pacific Railroad (UPRR) (APN 001-010-032 and APN 001-220-092). The proposed trail route then connects to a parcel of land owned by the County as part of Rincon Beach County Park. A series of terraces interspersed with steep slopes along the proposed alignment route are evidence of extensive past grading for a former railroad bed and road cuts. Further evidence of extensive past grading is evident in the soils within the project site, as the vast majority of the site is composed of xerorthents, cut and fill areas, which are soils that are well drained, and are formed in material with a high content of gravel and cobbles derived from mixed rock sources (USDA 2020a). The remaining portion of the biological survey area contains a mapped section of beaches soils composed of sandy or stony alluvium along the coast, located along the bottom of the hill at the edge of the beach within Rincon Beach County Park (USDA 2020a).

The Union Pacific Railroad (UPRR) right-of-way provides an unvegetated corridor approximately 50 feet wide containing a single track that divides the project alignment near its center. The eastern terminus of the proposed trail alignment is within Rincon Beach County Park parking lot, consisting of both undeveloped terraces as well as a largely developed area where a paved parking lot and landscaping dominate. An existing unsanctioned trail extends between Rincon Beach County Park and the UPRR tracks extending west on the bluffs to the north of the UPRR tracks with spur trails providing beach access. The western portion of the alignment is situated west and south of U.S. Highway 101 and partly includes an unvegetated pull-out at the eastern terminus of Carpinteria Avenue as well as an area of disturbed ground adjacent to the pull-out and undeveloped open space south of U.S. Highway 101.

Despite past disturbances, long stretches of the proposed trail alignment are dominated by native scrub vegetation. In the eastern portion of the proposed trail alignment between the UPRR crossing and Rincon Beach County Park, the native shrub, quailbush (*Atriplex lentiformis*), is the dominant shrub throughout much of the area. Additional native vegetation borders the parking lot in Rincon Beach County Park and occupies portions of the proposed trail alignment. In the western portion of the proposed trail alignment between the eastern terminus of Carpinteria Avenue and the UPRR crossing, California sagebrush (*Artemisia californica*), coyote brush (*Baccharis pilularis*), and quailbush are the dominant plant species.

The project site region is identified by USGS White Ledge Peak 7.5 quadrangle as well as the four coastally influenced adjacent USGS 7.5-minute quadrangles (Ventura, Matilija, Pitas Point, Carpinteria).

3.3.1.1 Literature Review

Prior to the 2011 field visit conducted by Dudek, the California Natural Diversity Database (CNDDDB) was queried for records of special-status plants and wildlife in the vicinity of the site. In addition, Carpinteria local botanist Larry Ballard was consulted for information on rare plants potentially occurring in the project vicinity, including those on the Rare Plants of Santa Barbara County list, issued by the Central Coast Center for Plant Conservation (CCCPC) (Wilken 2007) and those included on the Checklist of Ventura County Rare Plants (Magney 2020). Additional field surveys were performed in 2018, 2019, ~~and 2020, and 2021~~. Prior to 2018, 2019, 2020, and 2021 field surveys, the location of documented special-status plant species near the project site and that have potential to occur on site were identified through a query of the CNDDDB (CDFW 2018; CDFW 2020a) and the updated Rare Plants of Santa Barbara County (Wilken 2018). In summary the following were reviewed for this project:

- 2008-2009 Second Wet Season 90-Day Vernal Pool Branchiopod Survey Report, King Ventures Rincon Bluffs Carpinteria, California (Sage Institute Inc. 2009)
- Administrative Draft Environmental Impact Report Carpinteria Bluffs, Areas III Development Plan (INTERFACE Planning and Counseling Corporation 1981)
- Carpinteria Bluffs Areas 2 and 3 Biological Resource Analysis & Mapping (Firma 2008)
- Carpinteria Bluffs Biological Resources and Environmentally Sensitive Habitat (Condor Environmental Planning Services 1996)
- CDFW CNDDDB (CDFW 2018; CDFW 2020a)
- Checklist of Ventura County Rare Plants (Magney 2020)
- CNPS Inventory of Rare and Endangered Plants (CNPS 2020)
- Draft Carpinteria Bluffs Area III Project Biological Resources Due Diligence Report (Dudek 2012a)

- Evaluation Report Carpinteria Bluffs Biological Resources and Environmentally Sensitive Habitat Areas (LSA Associates Inc. 1997)
- Initial Biological Assessment: Rincon Trail (VJS Biological Consulting 2008)
- List of potentially occurring listed species generated from a review of the USFWS's IPaC Trust Resources Report list of federal and threatened species (USFWS 2020a)
- Proposed Final Mitigated Negative Declaration Carpinteria Rincon Trail (City of Carpinteria 2015)
- Proposed Final Subsequent Mitigated Negative Declaration. Carpinteria Rincon Trail (City of Carpinteria 2019)
- Rare Plants of Santa Barbara County list (Wilken 2007, 2018)
- USGS National Hydrography Dataset (USGS 2020)
- USFWS Critical Habitat Mapper (USFWS 2020b)
- USFWS National Wetlands Inventory (USFWS 2020c)
- Wetland Delineation of Pool Features at Carpinteria Bluffs Areas III per the California Coastal Act, City of Carpinteria, California (Dudek 2012b)

The biological survey area includes the proposed trail alignment as well as the extent of ~~proposed temporary~~ potential impacts encompassing vegetated terraces and slopes above and below the proposed trail alignment as well as portions of the developed Rincon Beach County Park (see Figure 3.3-1).

3.3.1.2 Vegetation Communities and Wildlife Habitats

During 2018, Dudek biologists conducted vegetation community mapping within the biological survey area in the field using the List of Vegetation Alliances and Associations (Natural Communities List) (CDFW 2010), which is based on the *Manual of California Vegetation, Second Edition* (MCV2) (Sawyer et al. 2009), as shown in Table 3.3-1. The vegetation communities were updated to align with the California Natural Community List (CNCL) (CDFW 2020b), which incorporated changes based on taxonomic revisions related to dominant plants, reassignment of associations to new or different alliances, and revisions to the rarities rankings of some communities. If vegetation observed did not meet the membership rules of the vegetation communities in these sources, modifications were made to accommodate the lack of conformity of the observed communities (e.g., developed/disturbed land uses) using Oberbauer et al. (2008). Vegetation community mapping conducted in 2018 was confirmed and/or updated during the 2020 site visit. An additional site visit was conducted in May 2021 to perform vegetation mapping, special-status plant species survey, and a tree assessment within the expanded biological survey area to include the limits of Alternative 4.

The following minimum vegetation mapping units applied during vegetation mapping:

- 0.5–1.0 acre for inaccessible areas of the site due to steep terrain.
- acres for wetland (i.e., hydrophytic) vegetation in traditional wetland environments (i.e., OBL [obligate – plant species almost always in wetlands], FACW [facultative wetland – plant species usually occurring in wetlands but occasionally found in non-wetlands], but not all FAC [facultative – plant species equally likely to occur in wetlands and non-wetlands] species comprising a vegetation alliance will be mapped unless associated with a hydrologic unit – stream, depression, swale, etc.).
- all areas with sensitive vegetation communities were mapped (no minimum mapping unit identified for sensitive vegetation communities)

Table 3.3-1. Survey Dates, Times, Personnel, and Conditions for Biological Surveys

Survey Date	Time	Personnel	Survey Conditions	Survey Type
8/31/2011	0940-1253	Dave Compton	61°F–63°F, 70%–100% cloud cover, 1-8 mph winds	General Biological Survey
5/5/2018	0655-1040	Heather Moine	55°F–68°F, 50%–70% cloud cover, 1-2 mph winds	Special-Status Plant Species Survey
5/15/2018	0630-0755	Heather Moine	51°F–60°F, 0% cloud cover, 1-3 mph winds	Vegetation Mapping
7/21/2018	0700-0900	Heather Moine	63°F–64°F, 100% cloud cover, 1-2 mph winds	Special-Status Plant Species Survey
9/26/2018	1300-1510	Heather Moine	67°F–69°F, 50%–75% cloud cover, 2-3 mph winds	Special-Status Plant Species Survey, Vegetation Mapping
4/8/2019	1505-1825	Heather Moine	80°F–85°F, 10%–80% cloud cover, 2-3 mph winds	Special-Status Plant Species Survey
7/23/2019	1300-1605	Heather Moine	75°F–79°F, 0%–20% cloud cover, 4-5 mph winds	Special-Status Plant Species Survey
12/24/2020	1320-1505	Mackenzie Forgey	69°F–68°F, 90% cloud cover, 2-9 mph winds	General Biological Survey; Tree Assessment
<u>5/17/2021</u>	<u>1330-1706</u>	<u>Heather Moine</u>	<u>60°F–61°F, 10%–100% cloud cover, 0-6 mph winds</u>	<u>Special-Status Plant Species Survey;</u> <u>Vegetation Mapping;</u> <u>Tree Assessment</u>

Notes: °F = degrees Fahrenheit; mph = miles per hour.

The CNCL (CDFW 2020b) is a hierarchical classification system which classifies natural vegetation communities based on alliances, which contain associations, the most granular level of classification (CDFW 2020c). The CNCL includes a state rarity rank based on the NatureServe Standard Heritage Methodology (NatureServe 2020). The conservation status of a vegetation community is designated by a number from 1 to 5, preceded by a letter reflecting the appropriate geographic scale of the assessment (G = global, N = national, and S = subnational). For the purpose of this report the focus is the S rarity rank. The numbers have the following meaning (NatureServe 2020):

- 1 = critically imperiled
- 2 = imperiled
- 3 = vulnerable to extirpation or extinction
- 4 = apparently secure
- 5 = demonstrably widespread, abundant, and secure

For example, S1 would indicate that a vegetation community is critically imperiled within a particular state or province. A rank of S3 would indicate the vegetation community is vulnerable and at moderate risk within a particular state or province, although it may be more secure elsewhere (NatureServe 2020). The CNCL (CDFW 2020b) includes state-level rarity rankings (i.e., the subnational [S] rank) for vegetation communities. The CNCL is considered the authority for ranking the conservation status of vegetation communities in California. As described by CDFW 2020c, ranking is an ongoing process and some associations are considered sensitive, denoted by a “Y” in the “Sensitive” column of the list, while others lack association-specific global and state ranks. This “Y” in the sensitive column indicates rarity, although that alliance may not be rated S3 or below as well (CDFW 2020c). CDFW

expects to provide association level ranks for all S3 or rarer entities in the future, including those associations that are considered sensitive despite lacking an S3 or rarer alliance ranking.

The overall condition and quality of habitat provided by each vegetation community including supporting wildlife species was assessed. Discussions include degrees of disturbance, biological productivity of supporting plant and/or wildlife populations, and the relative viability of the habitat resource are included for each vegetation community and land cover type.

County environmentally sensitive habitat (ESH) and City environmentally sensitive habitat areas (ESHA) were evaluated based on definitions in the County *Coastal Land Use Plan* (CLUP) (County of Santa Barbara 2019) and the *City of Carpinteria General Plan and Local Coastal Plan* (City of Carpinteria 2003). Although most undeveloped areas of the coastal zone, as well as many isolated pockets of open space within urban areas, provide a “habitat” for many species of animals and plants, the intent of the Coastal Act is preservation of significant habitat resources. Coastal Act environmentally sensitive habitat areas are defined as “any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments” (Coastal Act, Section 30107.5). The County CLUP (County of Santa Barbara 2019) identifies ESH based on such factors as intrinsic, scientific, and educational value and includes the following biological resource categories:

- Dunes
- Wetlands
- Native Grasslands
- Vernal Pools
- Butterfly Trees
- Marine Mammal Rookeries and Hauling Grounds
- White-tailed Kite Habitat
- Rocky Points and Intertidal Areas
- Subtidal Reefs
- Kelp Beds
- Seabird Nesting and Roosting Areas
- Native Plant Communities – examples: coastal sage scrub, chaparral, coastal bluff, closed cone pine forest, California native oak woodland (also individual oak trees), endangered and rare plant species as designated by CNPS, and other plants of special interest such as endemics
- Streams

The City of Carpinteria General Plan and Local Coastal Plan (City of Carpinteria 2003) ESHA includes a diversity and number of habitats and species not commonly found in urban areas and that warrant unique measures to ensure adequate protection. As such, the Carpinteria Bluffs have specifically been identified as an ESHA. The following list includes ESHA that have been identified as existing in Carpinteria:

- Wetlands
- Butterfly Habitat
- Marine Mammal Rookeries and Hauling Grounds
- Rocky Points and Intertidal Areas

- Subtidal Reef
- Kelp Beds
- Creeks and Riparian Habitat
- Significant Native Plant Communities such as coastal sage scrub, riparian scrub, coastal bluff scrub, and native oak woodlands
- Sensitive, rare, threatened or endangered species habitat

A total of ~~12~~ 14 vegetation communities and land cover types were recorded within the biological survey area, including ~~five~~ six native scrub communities and ~~seven~~ eight non-native communities and land cover types (Figure 3.3-1 and Table 3.3-2). All ~~five~~ six of the native vegetation communities found are protected under the County CLUP (County of Santa Barbara 2019) and the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003), identified as coastal sage scrub, coastal bluff scrub, and/or habitat for sensitive species, and are thus considered County ESH and City ESHA. ~~Two~~ Three of these ~~five~~ six communities, California brittle bush scrub – ashy buckwheat scrub alliance, Encelia californica association, California brittle bush scrub – ashy buckwheat scrub alliance, Encelia californica – Artemisia californica association, and lemonade berry scrub alliance, are also sensitive by virtue of their state rank. These communities are described in CNCL and MCV2. Eucalyptus, ice plant mats, and myoporum are non-native and do not have a state rank (state not applicable [SNA]). The other ~~four~~ five communities and land cover types are not listed in CNCL or MCV2.

While two individual Monterey cypress (*Hesperocyparis macrocarpa*) trees were identified in separate locations within the project site, one within the ~~potential temporary grading~~ impact area along the western portion of the site and the other within the proposed alignment footprint in the eastern portion of the site (Figure 3.3-1), they were not mapped as separate vegetation communities because one tree is not considered a stand or woodland. The first Monterey cypress tree is located near the western terminus of the proposed trail alignment, between the alignment and the pull-out off Carpinteria Avenue, and has a diameter of approximately 10 inches measured 4 feet above the ground. The second Monterey cypress is located within the proposed trail alignment within an unsanctioned trail within Rincon Beach County Park and has a diameter of approximately 12 inches measured 4 feet from the ground. One additional Monterey cypress tree was identified in the northern portion of the project above the railroad right-of-way, which is located along the edge of the ~~temporary grading~~ impact area adjacent to disturbed habitat and was measured with an approximate 8-inch diameter measured from 4 feet above the ground. Two Monterey cypress trees are located within the developed portion of the Rincon Beach County Park, one of which is a very young sapling with a diameter under an inch and the other is a mature tree with a combined diameter measured 4 feet from the ground of 49 inches due to multiple stems. There are also trees associated with the Rincon Point housing development that abut Rincon Beach County Park and are located south and east of the ~~temporary~~ project impact area and include Monterey cypress trees.

Monterey cypress trees are not naturally occurring within the Carpinteria area and instead are documented as native in populations located in Monterey and Carmel, California (CNPS 2021); therefore, Monterey cypress trees are not considered sensitive vegetation communities or individual trees. However, Monterey cypress trees could be considered County ESH and/or City ESHA if used by sensitive wildlife species as further discussed in Section 3.3.1.4.

Two pine saplings that appeared to be newly planted with mulch placed around the trunks and stakes installed for tree stabilization, are located along the edge of the ~~temporary grading~~ impact area in the portion of the project above the railroad right-of-way, each under 4 inches diameter measured 4 feet from the ground. One of these newly

installed pine saplings is a Norfolk Island pine (*Araucaria heterophylla*), and the other could not be identified to species due to the lack of cones present at the time of the survey but appears to be a native pine tree (*Pinus* sp.).

There are also trees associated with the Rincon Point housing development that abut Rincon Beach County Park and are located south and east of the biological survey area, and include a few non-riparian California sycamore (*Platanus racemosa*) trees and other ornamental tree species located approximately 50-feet from Rincon Creek.

The County CLUP (County of Santa Barbara 2019) does not include mapped ESH within the project site. The City of Carpinteria General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003) includes mapped ESHA within the limits of the City north to but not including Carpinteria Avenue.

Table 3.3-2. Summary of Existing Vegetation Communities and Land Cover Types

Habitat Group	General Habitat	Vegetation Community (Alliance, Association)	Alliance-Association (State Sensitive)/County ESH/City ESHA	Acreage
Native Scrub Communities	Coastal Bluff Scrub	California Brittle Bush – Ashy Buckwheat Scrub Alliance, <i>Encelia californica</i> Association	S3-Yes (Yes)/Yes/Yes	0.96
		California Brittle Bush – Ashy Buckwheat Scrub Alliance, <i>Encelia californica</i> – <i>Artemisia californica</i> Association	<u>S3-Yes (Yes)/Yes/Yes</u>	<u>0.48</u>
		Quailbush Scrub Alliance, <i>Atriplex lentiformis</i> Association	S4-No (No)/Yes/Yes	6.18 <u>6.93</u>
	Coastal Bluff Scrub Subtotal			7.13 <u>8.38</u>
	Coastal Scrub	California Sagebrush – (Purple Sage) Scrub Alliance, <i>Artemisia californica</i> Association	S5-S4 (No)/Yes/Yes	2.08 <u>2.13</u>
		Coyote Brush Scrub Alliance, <i>Baccharis pilularis</i> Association	S5-No (No)/Yes/Yes	1.18
		Lemonade Berry Scrub Alliance, <i>Rhus integrifolia</i> Association	S3-S3 (Yes)/Yes/Yes	0.31 <u>0.64</u>
	Coastal Scrub Subtotal			3.57 <u>3.94</u>
Non-native Communities and Land Cover Types	Non-native Communities	Eucalyptus – Tree of Heaven – Black Locust Groves Alliance, <i>Eucalyptus (globulus, camaldulensis)</i> Association	SNA-SNA (No)/No/No	0.24 <u>0.23</u>
		Ice Plant Mats Alliance, <i>Carpobrotus (edulis)</i> Association	SNA-SNA (No)/No/No	0.14
		Pepper Tree or Myoporum Groves Alliance, <i>Myoporum laetum/ Arundo donax</i> Association	SNR-SNA (No)/No/No	0.07 <u>0.13</u>
		Parks and Ornamental Plantings	NA (No)/No/No	0.10
		Ruderal	NA (No)/No/No	0.17
	Land Cover Types	Developed	NA (No)/No/No	1.08 <u>1.10</u>
		Disturbed Habitat	NA (No)/No/No	1.45

Table 3.3-2. Summary of Existing Vegetation Communities and Land Cover Types

		Unvegetated Siltstone/Shale Bedrock	NA (No)/No/No	0.18
Non-native Communities and Land Cover Types Subtotal				3.22 3.50
Combined Total				13.92 15.82

Notes:

SNA – state not applicable. State status rank not applicable because the species or ecosystem is not a suitable target for conservation activities (NatureServe 2020).

SNR – state no rank (NatureServe 2020).

NA – not applicable. Not included in California Natural Communities List (CDFW 2020b).

Native Scrub Communities

California Brittle Bush – Ashy Buckwheat Scrub Alliance, *Encelia californica* Association (S3-Sensitive [Sensitive], County ESH, City ESHA). This community includes California brittle bush and/or ashy buckwheat (*Eriogonum cinereum*) as the dominant or co-dominant shrub in the canopy. California brittle bush – ashy buckwheat scrub has an intermittent to continuous shrub canopy less than two meters (seven feet) in height with a variable herbaceous ground layer. The California brittle bush – ashy buckwheat scrub alliance occurs on sunny, steep south-facing slopes often rocky or eroded, with soils derived from sandstone, volcanic or shale substrates (Sawyer et al. 2009). Species associated with California brittle bush scrub on site include quailbush (*Atriplex lentiformis*), California sagebrush, coyote brush, western prickly pear (*Opuntia littoralis*), and black mustard.

California brittle brush scrub occurs in limited patches within the project site, wildlife using this community is partly dictated by adjacent communities, which are generally other scrub communities. Brush rabbits (*Sylvilagus bachmani*) may occur within these areas, and some species of small mammals may occur here as well. The Coast Range western fence lizard (*Sceloporus occidentalis bocourti*) likely occur within this community and within adjacent communities. Songbirds with the potential to nest within this community include the mourning dove (*Zenaidura macroura*), bushtit (*Psaltiriparus minimus*), northern mockingbird (*Mimus polyglottos*), and song sparrow (*Melospiza melodia*).

California brittle brush scrub has a S3-Sensitive designation and is thus considered a sensitive vegetation community per CDFW (2020b). California brittle bush scrub is a state sensitive vegetation community, considered coastal bluff scrub per the County CLUP (County of Santa Barbara 2019), and supports sensitive plant species. Additionally, California brittle bush scrub is mapped as ESHA, considered coastal bluff scrub in the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003), and supports sensitive plant species. Therefore, California brittle bush scrub is considered County ESH and City ESHA.

The *Encelia californica* association within the California brittle bush – ashy buckwheat scrub alliance was mapped in the project site. This association occurs in the proposed trail alignment in and near the County's Rincon Beach County Park (see Figure 3.3-1). Approximately 0.96 acres of this community, or ~~6.9~~ 6.1% of the total biological survey area was identified.

California Brittle Bush – Ashy Buckwheat Scrub Alliance, *Encelia californica* – *Artemisia californica* Association (S3-Sensitive [Sensitive], County ESH, City ESHA). This community includes California brittle bush and/or ashy

buckwheat (*Eriogonum cinereum*) as the dominant or co-dominant shrub in the canopy. California brittle bush – ashy buckwheat scrub has an intermittent to continuous shrub canopy less than two meters (seven feet) in height with a variable herbaceous ground layer. The California brittle bush – ashy buckwheat scrub alliance occurs on sunny, steep south-facing slopes often rocky or eroded, with soils derived from sandstone, volcanic or shale substrates (Sawyer et al. 2009). Species associated with *Encelia californica* – *Artemisia californica* association on site include coyote brush, lemonade berry (*Rhus integrifolia*), seacliff buckwheat (*Eriogonum parvifolium*), and ladies' tobacco (*Pseudognaphalium californicum*).

Encelia californica – *Artemisia californica* association occurs in limited patches within the project site, and wildlife using this community is partly dictated by adjacent communities, which are generally other scrub communities. Similar to the *Encelia californica* association within the California brittle bush – ashy buckwheat scrub alliance, this community supports the following wildlife species, brush rabbits, Coast Range western fence lizard, mourning dove, bushtit, northern mockingbird, and song sparrow.

California brittle brush scrub has a S3-Sensitive designation and is thus considered a sensitive vegetation community per CDFW (2020b). California brittle bush scrub is a state sensitive vegetation community, considered coastal bluff scrub per the County CLUP (County of Santa Barbara 2019), and supports sensitive plant species. Additionally, California brittle bush scrub is mapped as ESHA, considered coastal bluff scrub in the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003), and supports sensitive plant species. Therefore, California brittle bush scrub is considered County ESH and City ESHA.

The *Encelia californica* – *Artemisia californica* association within the California brittle bush – ashy buckwheat scrub alliance was mapped in the project site. This association occurs within the southern portion of the project site along U.S. Highway 101 (see Figure 3.3-1). Approximately 0.48 acres of this community, or 3.0% of the total biological survey area was identified.

Quailbush Scrub Alliance, *Atriplex lentiformis* Association (S4-Not Sensitive [Not Sensitive], County ESH, City ESHA). This vegetation community includes quailbush as a dominant species. Quailbush scrub has an open to intermittent scrub canopy less than five meters (16 feet) in height with a variable herbaceous layer (Sawyer et al. 2009). In the proposed trail alignment, species associated with this community include California brittle bush, lemonade berry and Australian saltbush (*Atriplex semibaccata*).

Quailbush scrub provides shelter for brush rabbits and probably for other medium-sized mammal species such as the raccoon (*Procyon lotor*) and striped skunk (*Mephitis mephitis*). California voles (*Microtus californicus*) may occur in this vegetation community. Common reptile species that occur here include the Coast Range western fence lizard and San Diego gophersnake (*Pituophis catenifer annectens*). Nesting songbirds occurring here include the mourning dove, bushtit, northern mockingbird, and song sparrow. Songbirds that may perch on shrubs within this community include the black phoebe (*Sayornis nigricans*).

Quailbush scrub has a S4-Not Sensitive designation and thus is not considered a sensitive vegetation community per CDFW (2020b). Quailbush scrub, however, is considered coastal bluff scrub per the County CLUP (County of Santa Barbara 2019) and mapped as ESHA and considered coastal bluff scrub in the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003), and therefore considered County ESH and City ESHA. Additionally, this vegetation community supports sensitive plant species and has the potential to support the state species of special concern (SSC) California legless lizard and further warrants County ESH and City ESHA designations.

The *Atriplex lentiformis* association within the quailbush scrub alliance was mapped in the project site. It occurs extensively in the proposed trail alignment east of the UPRR and in patches west of the UPRR (see Figure 3.3-1). Approximately ~~6.18~~ 6.93 acres of this community, or ~~44.3~~ 43.8% of the total biological survey area was identified.

California Sagebrush – (Purple Sage) Scrub Alliance, *Artemisia californica* Association (S5-S4 [Not Sensitive], County ESH, City ESHA). This community includes California sagebrush (*Artemisia californica*) and/or purple sage (*Salvia leucophylla*) as the dominant or co-dominant shrub in the canopy. California sagebrush scrub has an intermittent to continuous shrub canopy less than two meters (seven feet) in height with a variable herbaceous ground layer (Sawyer et al. 2009). Species associated with this community include California brittle bush (*Encelia californica*), coast goldenbush (*Isocoma menziesii*) and coyote brush (*Baccharis pilularis*). Black mustard (*Brassica nigra*) and other non-native species are found in this community on site.

Wildlife occupying California sagebrush scrub includes many species common to other scrub communities within the project site. Brush rabbits seek cover in these areas, and small mammals such as California voles likely occur here. Coast Range western fence lizards and San Diego gophersnakes are reptiles that occur in scrub habitats. Songbirds nesting here include the mourning dove, northern mockingbird, California towhee (*Melospiza crissalis*), and song sparrow. White-crowned sparrows (*Zonotrichia leucophrys*) occur here in winter.

California sagebrush scrub has a S5-S4 designation thus is not considered a sensitive vegetation community per CDFW (2020b). California sagebrush scrub is considered coastal sage scrub per the County CLUP (County of Santa Barbara 2019) and mapped as ESHA and considered coastal sage scrub in the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003), and therefore considered County ESH and City ESHA. Additionally, this vegetation community supports sensitive plant species and further warrants County ESH and City ESHA designations.

The *Artemisia californica* association within the California sagebrush – (purple sage) scrub alliance was mapped in the project site. This association occurs in the western portion of the project site, near Carpinteria Avenue and U.S. Highway 101, in a heavily engineered portion of the proposed trail alignment graded during highway construction (see Figure 3.3-1). Smaller patches occur adjacent to the parking lot for Rincon Beach County Park and east of UPRR. Approximately ~~2.08~~ 2.13 acres of this community, or ~~14.9~~ 13.4% of the total biological survey area was identified.

Coyote Brush Scrub Alliance, *Baccharis pilularis* Association (S5-Not Sensitive [Not Sensitive], County ESH, City ESHA). Coyote brush scrub communities include greater than 50% relative cover of coyote brush and coyote brush as the dominant or co-dominant shrub in the canopy. Coyote brush scrub has a variable shrub canopy less than three meters (10 feet) in height with a variable herbaceous ground layer (Sawyer et al. 2009). Species associated with this community in the proposed trail alignment include scattered California sagebrush, California brittle bush, myoporum (*Myoporum laetum*) and black mustard.

Wildlife occurring in coyote brush scrub is very similar to that occurring in quailbush scrub and includes brush rabbits, raccoon, striped skunk, California voles, Coast Range western fence lizard, San Diego gophersnake, mourning dove, bushtit, northern mockingbird, song sparrow and black phoebe.

Coyote brush scrub has a S5-Not Sensitive designation thus is not considered a sensitive vegetation community per CDFW (2020b). Coyote brush scrub is not considered coastal sage scrub or associated with other ESH habitats by definition per the County CLUP (County of Santa Barbara 2019); however, coyote brush scrub does support sensitive plant species and as such is designated County ESH. Additionally, coyote brush scrub is mapped as ESHA

in the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003), and also supports sensitive plant species and therefore considered City ESHA.

The *Baccharis pilularis* association within the coyote brush scrub alliance was mapped in the project site. It occurs in the proposed trail alignment mostly near the western terminus, but also in small patches in the vicinity of Rincon Beach County Park. The coyote brush scrub between UPRR and U.S. Highway 101 occurs in old road cuts (see Figure 3.3-1). Approximately 1.18 acres of this community, or ~~8.5~~ 7.4% of the total biological survey area was identified.

Lemonade Berry Scrub Alliance, *Rhus integrifolia* Association (S3-S3 [Sensitive], County Not Sensitive, City Not Sensitive). This vegetation community includes lemonade berry (*Rhus integrifolia*) as either a dominant or co-dominant species. Lemonade berry scrub has a two-tiered, open to continuous shrub canopy less than five meters (16 feet) in height with an open herbaceous ground layer and sparse cover of emergent trees (Sawyer et al. 2009). Species associated with this community on site include coyote brush and myoporum.

Wildlife occurring in lemonade berry scrub is similar to that occurring in Coyote brush scrub and includes brush rabbits, raccoon, striped skunk, California voles, Coast Range western fence lizard, San Diego gophersnake, mourning dove, bushtit, northern mockingbird, song sparrow and black phoebe.

Lemonade berry scrub has a S3-S3 designation and thus is considered a sensitive vegetation community per CDFW (2020b). Lemonade berry scrub is not considered coastal sage scrub or associated with other ESH habitats by definition per the County CLUP (County of Santa Barbara 2019); however, it does support sensitive plant species and is a state sensitive vegetation community and thus is considered County ESH. Additionally, lemonade berry scrub is not considered coastal sage scrub or associated with other ESHA habitats by definition per the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003); however, it does support sensitive plant species and is a state sensitive vegetation community and thus is considered City ESHA.

The *Rhus integrifolia* association within the lemonade berry scrub alliance was mapped in the project site. This association occurs in two small patches west of the Rincon Beach County Park and along U.S. Highway 101 east of UPRR (see Figure 3.3-1). Approximately ~~0.31~~ 0.64 acres of this community, or ~~2.2~~ 4.0% of the total biological survey area was identified.

Non-Native Communities

Eucalyptus – Tree of Heaven – Black Locust Groves Semi-Natural Alliance, *Eucalyptus (globulus, camaldulensis)* Provisional Association (SNA-SNA [Not Sensitive], County Not Sensitive, City Not Sensitive). This alliance contains eucalyptus trees (*Eucalyptus* sp.), tree of heaven (*Ailanthus altissima*), or black locust (*Robinia pseudoacacia*) as the dominant species in the tree canopy. These groves have an open to continuous tree canopy less than 60 meters (197 feet) in height. Understory shrubs and herbaceous layers are sparse to intermittent, and the herbaceous layer is sparse to intermittent. Throughout California, this semi-natural groves alliance occurs as planted trees, groves, and windbreaks, naturalized on uplands or bottomlands and adjacent to stream courses, lakes, or levees (Sawyer et al. 2009).

The Eucalyptus – tree of heaven – black locust groves semi-natural alliance and specific *Eucalyptus (globulus, camaldulensis)* association is listed in MCV2 (Sawyer et al. 2009) and CNCL (CDFW 2020b), but is ranked SNA-SNA as it is composed of non-native species; it is not considered sensitive. Additionally, per the County CLUP (County of Santa Barbara 2019) eucalyptus trees are considered ESH if they are butterfly trees or provide habitat to sensitive

species. Per the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003) eucalyptus trees are considered ESHA if they provide habitat for butterfly habitat or sensitive, rare, threatened or endangered species habitat. Included below is a discussion of potential wildlife use of the eucalyptus trees.

Because of shade and possibly the allelopathic (toxic) properties of eucalyptus leaf litter, little other vegetation is present in this community, and relatively little wildlife is found here. But the relatively open ground under the canopy permits medium-sized mammals such as common raccoons and striped skunks to move easily through this community to access adjacent areas. Some bird species are adapted to this community. Yellow-rumped warblers (*Setophaga coronata*) feed on insects attracted to eucalyptus blossoms in the winter. Some birds of prey favor eucalyptus trees for nesting. Red-tailed hawks (*Buteo jamaicensis*), Cooper's hawks (*Accipiter cooperii*), and great horned owls (*Bubo virginianus*) also have the potential to nest in this community.

Monarch butterflies (*Danaus plexippus*) use eucalyptus trees for roosting in the region, but they are not known to use eucalyptus within the project site. The majority of eucalyptus trees within the project site are either singular and isolated, or do not form a large enough grove to provide adequate microclimate conditions and wind protection monarch butterflies require for overwintering sites. Several eucalyptus trees are located within the proposed trail alignment near its western terminus and U.S. Highway 101, and range in diameter from approximately 18 to 28 inches measured 4 feet from the ground. Additionally, a small stand of eucalyptus trees is present at the eastern terminus of the biological survey area, which are rooted next to the Rincon Beach County Park parking lot; however, there is low potential for monarchs to overwinter here as well due to the small relative size of this eucalyptus stand and vulnerability to strong winds and weather. There are also three eucalyptus trees present near the western terminus of the biological survey area, however they each grow individually and do not form a grove capable of supporting overwintering monarchs. There are also trees associated with the Rincon Point housing development that abut Rincon Beach County Park and are located south and east of the eastern portion of the biological survey area and include some eucalyptus trees. Monarch butterflies and monarch butterfly habitat are further discussed in Section 3.3.1.4.

The white-tailed kite is known to occur in the area (City of Carpinteria 2003). The City specifically cites the Carpinteria Bluffs as a location where this species occurs and is protected. However, no white-tailed kites were detected in the biological survey area, and the eucalyptus trees in and around the western portion of biological survey area are relatively small, and located in areas with high levels of human disturbance where kites are unlikely to nest. Marginally suitable woodland nesting habitat is present in the trees adjacent to the project site near Rincon Beach County Park, within the Rincon Point housing development. This species prefers open grassland or marshland habitats which are not present on site, and is found less commonly in agricultural areas or rights-of-way. This species is known to occur along the south coast, however most foraging and nesting activity in the County is restricted to more rural areas and in particular, the Goleta and Santa Maria Valleys (Lehman 2020).

The *Eucalyptus (globulus, camaldulensis)* provisional association within the eucalyptus - tree of heaven - black locust semi-natural alliance was mapped in the project site. Within the biological survey area this community is dominated by eucalyptus trees, which are sparse and do not create a windrow and do not provide habitat for sensitive species; and thus are not included as ESH per County of Santa Barbara (2009) or ESHA per City of Carpinteria (2003). Approximately ~~0.21~~ 0.23 acres of this community, or 1.5% of the biological survey area was identified.

Ice Plant Mats Semi-Natural Alliance, *Carpobrotus (edulis)* Association (SNA-SNA [Not Sensitive], County Not Sensitive, City Not Sensitive). Ice plant mats contains hottentot fig (*Carpobrotus edulis*), sea fig (*Carpobrotus chilensis*), or other ice plant taxa as the dominant or co-dominant species in the herbaceous layer. These species

invade coastal bluff scrub, dune mat, dune scrub, and coastal prairies and compete with native plants (Sawyer et al. 2009). Ice plant semi-natural alliance areas have an intermittent to continuous canopy within the herbaceous layer less than 0.5 meters (1.6 feet) in height.

Very few wildlife species occur in ice plant mats. California ground squirrels (*Spermophilus* [*Otospermophilus*] *beecheyi*) often inhabit this community. This community provides poor nesting habitat for birds. Common reptiles such as the western fence lizard likely occur here. This community is not generally valuable to special-status wildlife species.

The ice plant mats semi-natural alliance and specific *Carpobrotus* (*edulis*) association is listed in MCV2 (Sawyer et al. 2009) and CNCL (CDFW 2020b), but is ranked SNA-SNA as it is composed of non-native species; therefore, it is not considered sensitive. Additionally, ice plant mats vegetation community is not included on the list of ESH per the County CLUP (County of Santa Barbara 2019) or provide habitat for sensitive species. Ice plant mats are not mapped as ESHA, included as other ESHA habitats in the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003), and do not provide habitat for sensitive species, and therefore not considered locally sensitive.

The *Carpobrotus* (*edulis*) association within the ice plant mats semi-natural alliance was mapped in the project site. Approximately 0.14 acres of this community, or ~~1.0~~ 0.9% of the biological survey area was identified.

Pepper Tree or Myoporum Groves Semi-Natural Alliance, *Myoporum laetum*/*Arundo donax* Association (SNR-SNA [Not Sensitive], County Not Sensitive, City Not Sensitive). Pepper tree or myoporum groves consist of myoporum or pepper trees (*Schinus* spp.) as the dominant species in the tree canopy. Within the biological survey area, this community is dominated by myoporum. These groves have an open to continuous tree canopy less than 18 meters (59 feet) in height. Understory shrubs are infrequent or common and the herbaceous layer is simple to diverse lacking trees and shrubs. Throughout Central and Southern California, the pepper trees or myoporum groves semi-natural alliance occurs in coastal canyons, washes, slopes, riparian areas, and roadsides (Sawyer et al. 2009).

Several myoporum trees are located within the proposed trail alignment west of Rincon Beach County Park, and are largely multistemmed. Myoporum groves provide shelter for medium-sized mammal species such as the brush rabbit, common raccoon, and striped skunk. California voles may occur in this vegetation community. Common reptile species such as the western fence lizard likely occur. Nesting songbirds occurring here likely include the mourning dove, bushtit, and northern mockingbird. Wintering black phoebes are among birds that likely perch on myoporum. Some birds of prey, such the white-tailed kite and other raptors, may also perch in this community where it is adjacent to foraging habitat.

This semi-natural alliance and specific *Myoporum laetum*/*Arundo donax* association mapped on site are listed in MCV2 (Sawyer et al. 2009) and CNCL (CDFW 2020b), but is ranked SNA as it is composed of non-native species; thus, it is not considered sensitive. Additionally, myoporum is not included on the list of ESH per the County CLUP (County of Santa Barbara 2019) or provide habitat for sensitive species. Myoporum are not mapped as ESHA, included as other ESHA habitats in the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003), and do not provide habitat for sensitive species, and therefore not considered locally sensitive.

The *Myoporum laetum*/*Arundo donax* association within the pepper tree or myoporum groves semi-natural alliance was mapped in the project site. Approximately ~~0.7~~ 0.13 acres of this community, or ~~0.5~~ 0.8% of the biological survey area was identified.

Parks and Ornamental Plantings (NA [Not sensitive], County Not Sensitive, City Not Sensitive). This community is not described in CNCL or MCV2 because it is not a naturally occurring community in California; thus, it is not considered sensitive. It includes landscaping plants as dominants. Additionally, parks and ornamental plantings is not included on the list of ESH per the County CLUP (County of Santa Barbara 2019) or provide habitat for sensitive species. Parks and ornamental plantings are not mapped as ESHA, included as other ESHA habitats in the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003), and do not provide habitat for sensitive species, and therefore not considered locally sensitive.

The ornamental vegetation community in the proposed trail alignment is characterized by the dominance of landscaped plant species. Botta's pocket gopher (*Thomomys bottae*) and California ground squirrel are among common mammals found in this community. Western fence lizards are a common reptile found in parks and ornamental plantings. Common nesting birds such as Eurasian collared-dove (*Streptopelia decaocto*), California scrub-jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), bushtit, and house finch (*Haemorhous mexicanus*) may be found here.

Parks and ornamental plantings occur within the eastern part of Rincon Beach County Park (see Figure 3.3-1). Approximately 0.10 acres of this community, or ~~0.7~~ 0.6% of the biological survey area was identified.

Ruderal (NA [Not Sensitive], County Not Sensitive, City Not Sensitive). Ruderal is not described in CNCL or MCV2 because it is not a naturally occurring community in California; thus, it is not considered sensitive. Additionally, ruderal habitats are not included on the list of ESH per the County CLUP (County of Santa Barbara 2019) or provide habitat for sensitive species. Ruderal habitats are not mapped as ESHA, included as other ESHA habitats in the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003), and do not provide habitat for sensitive species, and therefore not considered locally sensitive.

Ruderal areas are characterized by limited native vegetation resulting in low function ecological processes. Plants in these areas are dominated by non-native species and there is not a dominant plant species or overall structure to the habitat. Ruderal areas provide little habitat or foraging potential for wildlife, due to the lack of significant cover by vegetation; however, there are often patchy areas of non-native plant species. Mammals may include common species, such as the California ground squirrel, but medium-sized mammals such as raccoons may use ruderal habitats as movement corridors. Among common reptiles that may use these areas is the western fence lizard. Seed-eating birds found here include the California towhee and white-crowned sparrow. Ruderal does not provide habitat for special-status wildlife species.

Mapped ruderal includes roadside areas and areas with disturbed non-native vegetation (see Figure 3.3-1). Approximately 0.17 acres of this community, or ~~1.3~~ 1.1% of the biological survey area was identified.

Land Cover Types

Developed (NA [Not Sensitive], County Not Sensitive, City Not Sensitive). Within the biological survey area, developed areas are unvegetated areas such as pavement and development with impervious materials, it is not described in CNCL or MCV2, and does not provide habitat for sensitive species. Developed areas include the parking lot at Rincon Beach County Park and the wide turnout at the eastern terminus of Carpinteria Avenue (see Figure 3.3-1). Approximately ~~1.08~~ 1.10 acres of developed area, or ~~7.7~~ 7.0% of the biological survey area was identified.

Disturbed Habitat (NA [Not Sensitive], County Not Sensitive, City Not Sensitive). This land cover type, which is not described in CNCL or MCV2, includes invasive non-native and other disturbance-tolerant species as dominants, and does not support sensitive species. Species occurring within this community, including some natives, are those that are tolerant to disturbances such as grading or vegetation clearing. On-site, species appearing in disturbed areas include poison hemlock (*Conium maculatum*), black mustard, Hottentot fig, and horseweed (*Erigeron canadensis*). Approximately 1.45 acres of this land cover type, or ~~10.45~~ 9.1% of the biological survey area was identified.

Unvegetated Siltstone/Shale Bedrock (NA [Not Sensitive], County Not Sensitive, City Not Sensitive). Within the biological survey area, unvegetated siltstone/shale bedrock areas are unvegetated areas with exposed siltstone/shale bedrock, it is not described in CNCL or MCV2, and does not provide habitat for sensitive species. Unvegetated siltstone/shale bedrock areas include the southern slope along UPRR and southern portion of the biological survey area along U.S. Highway 101 (see Figure 3.3-1). Approximately 0.18 acre of unvegetated siltstone/shale bedrock, or 1.1% of the biological survey area was identified.

3.3.1.3 Special-Status Plant Species

During 2018, ~~and 2019, and 2021~~, Dudek biologists performed floristic surveys for special-status plant species, as shown in Table 3.3-1. All plant species encountered during the field surveys were identified to subspecies or variety, if possible. Species that could not be identified in the field were brought into the laboratory for further investigation. Scientific and common names for plant species with a California Rare Plant Rank (CRPR) follow the California Native Plant Society On-Line Inventory of Rare, Threatened, and Endangered Plants of California (CNPS 2020). For plant species without a California Rare Plant Rank, scientific names follow the Jepson Interchange for California Floristics; Index to California Plant Names (Jepson Flora Project 2020) and common names follow the California Natural Community List (CDFW 2020b) or the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service Plants Database (USDA 2020b).

For the purpose of CEQA analysis, federal, state, CNPS CRPR 1A, 1B, 2A, and 2B plants, and locally rare plants (Wilken 2018) are considered special-status. CRPR 3 and 4 plants are CNPS designated rare, but not considered special-status as plant species but do add to the vegetation community value designated as County ESH and or City ESHA as CNPS CRPR 3 and 4 species.

In considering rarity beyond federal or state designations, the CNPS Inventory of Rare and Endangered Vascular Plants of California was the primary reference (CNPS 2020). Use of the CNPS inventory is helpful because it clearly defines levels of endangerment and rarity for all of the species addressed. The CNPS inventory divides its subject taxa into four ranks: CRPR 1 (which is further divided into 1A and 1B), CRPR 2 (which is further divided into 2A and 2B), CRPR 3, and CRPR 4. Plants with a CRPR of 1A are presumed extirpated or extinct because they have not been seen or collected in the wild in California for many years. Plants with a CRPR of 1B are rare throughout their range, with the majority of them endemic to California. Most of the plants that are ranked 1B have declined significantly over the last century. Plants with a CRPR of 2A are presumed extirpated because they have not been observed or documented in California for many years. Except for being common beyond the boundaries of California, plants with a CRPR of 2B would have been ranked 1B. Plants with a CRPR of 3 have not had sufficient information collected to assign them to one of the other ranks or to reject them. Nearly all of the plants constituting CRPR 3 are taxonomically problematic. Plants with a CRPR of 3 are plants about which more information is needed and 4 are of limited distribution or infrequent throughout a broader area in California, and their status should be monitored regularly. CRPR 3 plants lack necessary information to assign them to one of the other ranks or to reject them. Should the degree of endangerment or rarity of a CRPR 4 plant change, it would be transferred to a more appropriate rank.

CRPR plants are further defined as follows:

- .1 = seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- .2 = moderately threatened in California (20%–80% occurrences threatened/moderate degree and immediacy of threat)
- .3 = not very threatened in California (<20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

A total of ~~133~~ 138 plant species were observed and identified during surveys. Of these, ~~57~~ 61 (~~43~~ 44%) are considered native and ~~76~~ 77 (~~57~~ 56%) are considered non-native to California, included as Appendix C1, Plant and Wildlife Species Compendium. The CNDDB (CDFW 2018; CDFW 2020a) and CNPS (CNPS 2020) queries returned 34 special-status plant species that have been documented within the USGS White Ledge Peak 7.5 quadrangle as well as the four coastally influenced adjacent USGS 7.5 minute quadrangles (Ventura, Matilija, Pitas Point, Carpinteria), hereafter referred to as the region. Only the four coastally influenced adjacent USGS 7.5-minute quadrangles were queried for sensitive biological resources instead of all adjacent quadrangle maps, since the habitats north of the foothills vary greatly from the project site and would not be representative of what species are likely to occur in coastal habitats. Dudek analyzed the resulting special-status plant species potential to occur based on known elevation or geographic range, suitable habitat, or the species has been extirpated from the region. Appendix C2, Plant and Wildlife Species Not Expected to Occur within the Biological Survey Area provides a list of the 20 special-status plant species that are not expected to occur based on site surveys, lack of suitable habitat, and the site being out of the species range. The special-status plant species in Appendix C2 are not analyzed in this report as no direct, indirect, or cumulative impacts are expected.

Based on Dudek's habitat suitability analysis including elevation and habitats, 11 of the special-status plant species had the potential to occur within the project site, and 3 special-status plant species were observed during 2018, ~~and 2019, and 2021~~ rare plant surveys. These 14 special-status plant species include aphanisma (*Aphanisma blitoides*), Miles' milk-vetch (*Astragalus didymocarpus* var. *milesianus*), Ventura marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*), Coulter's saltbush (*Atriplex coulteri*), South Coast saltscale (*Atriplex pacifica*), southern tarplant (*Centromadia parryi* ssp. *australis*), Orcutt's pincushion (*Chaenactis glabriuscula* var. *orcuttiana*), mesa horkelia (*Horkelia cuneata* var. *puberula*), California satintail (*Imperata brevifolia*), Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), cliff malacothrix (*Malacothrix saxatilis* var. *saxatilis*), aparejo grass (*Muhlenbergia utilis*), south coast branching phacelia (*Phacelia ramosissima* var. *austrolitoralis*), Nuttall's scrub oak (*Quercus dumosa*), salt spring checkerbloom (*Sidalcea neomexicana*), and woolly seablite (*Suaeda taxifolia*) (Table 3.3-3).

Table 3.3-3. Special-Status Plant Species Observed or with Potential to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ^a	Habitat Requirements	Potential to Occur within the BSA
<i>Aphanisma blitoides</i>	aphanisma	None/None/1 B.2	Coastal bluff scrub, Coastal dunes, Coastal scrub; sandy or gravelly/annual herb/Feb–June/3–1,000 feet amsl	Low potential to occur. Suitable coastal scrub and coastal bluff scrub habitat is present, however the only CNDDB occurrence in the region was last confirmed in 1963 and located 1.5 miles west of the Ventura River (CDFW 2020a). This species was not

Table 3.3-3. Special-Status Plant Species Observed or with Potential to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ^a	Habitat Requirements	Potential to Occur within the BSA
				detected during 2018, 2019, or 2021 special-status plant species surveys.
<i>Astragalus didymocarpus</i> var. <i>milesianus</i>	Miles' milk-vetch	None/None/1 B.2	Coastal scrub (clay)/annual herb/Mar–June/66–295 feet amsl	Low potential to occur. Suitable coastal scrub habitat is present, although clay soils are absent (USDA 2020a). There are only two CNDDDB occurrences in the region the most recent of which was recorded in the 1970s in the Ojai area (CDFW 2020a). This species was not detected during 2018, 2019, or 2021 special-status plant species surveys.
<i>Atriplex coulteri</i>	Coulter's saltbush	None/None/1 B.2	Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley and foothill grassland; alkaline or clay/perennial herb/Mar–Oct/10–1,505 feet amsl	Low potential to occur. Suitable coastal bluff scrub and coastal scrub habitat is present, and the large quantities of quailbush on site indicate that suitable alkaline soils may be present. This species is known to occur along Carpinteria coastal bluffs, however this is from an occurrence last confirmed in 1927 (CDFW 2020a). This species was not detected during 2018, 2019, or 2021 special-status plant species surveys.
<i>Atriplex pacifica</i>	South Coast saltscale	None/None/1 B.2	Coastal bluff scrub, Coastal dunes, Coastal scrub, Playas/annual herb/Mar–Oct/0–460 feet amsl	Low potential to occur. Suitable coastal bluff scrub and coastal scrub habitat is present and the large quantities of quailbush on site indicate that suitable alkaline soils may be present. However, there is only one occurrence in the region which was last confirmed in 1972 about 1.5 miles west of the Ventura River (CDFW 2020a). This species was not detected during 2018, 2019, or 2021 special-status plant species surveys.

Table 3.3-3. Special-Status Plant Species Observed or with Potential to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ^a	Habitat Requirements	Potential to Occur within the BSA
<i>Centromadia parryi</i> ssp. <i>australis</i>	southern tarplant	None/None/1 B.1	Marshes and swamps (margins), Valley and foothill grassland (vernally mesic), Vernal pools/annual herb/May–Nov/0–1,570 feet amsl	Low potential to occur. Suitable habitat is present in the disturbed habitat and ruderal areas on site, as this species can occur in disturbed sites (CDFW 2020a). However, the only occurrence in the region was last confirmed in 1997 and is considered possibly extirpated (CDFW 2020a). This species was not detected during 2018, 2019, or 2021 special-status plant species surveys.
<i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i>	Orcutt's pincushion	None/None/1 B.1	Coastal bluff scrub (sandy), Coastal dunes/annual herb/Jan–Aug/0–330 feet amsl	Low potential to occur. Suitable coastal bluff scrub habitat is present. However, the only occurrence in the region was last confirmed in 1961 and is considered possibly extirpated (CDFW 2020a). This species was not detected during 2018, 2019, or 2021 special-status plant species surveys.
<i>Horkelia cuneata</i> var. <i>puberula</i>	mesa horkelia	None/None/1 B.1	Chaparral (maritime), Cismontane woodland, Coastal scrub; sandy or gravelly/perennial herb/Feb–July(Sep)/230–2,655 feet amsl	Low potential to occur. Suitable coastal scrub habitat is present, although the most recently confirmed occurrence in the region is from 1935 (CDFW 2020a). This species was not detected during 2018, 2019, or 2021 special-status plant species surveys.
<i>Imperata brevifolia</i>	California satintail	None/None/2 B.1	Chaparral, Coastal scrub, Mojavean desert scrub, Meadows and seeps (often alkali), Riparian scrub; mesic/perennial rhizomatous herb/Sep–May/0–3,985 feet amsl	Low potential to occur. Suitable coastal scrub habitat is present, and the large quantities of quailbush on site indicate that suitable alkaline soils may be present. However, there are only two occurrences in the region, both of which are located behind the transverse ranges north the site, approximately 11 miles northeast of the project site (CDFW 2020a). This species was not detected during 2018, 2019, or 2021 special-status plant species surveys.
<i>Lonicera subspicata</i> var. <i>subspicata</i>	Santa Barbara honeysuckle	None/None/1 B.2	Chaparral, Cismontane woodland, Coastal scrub/perennial evergreen shrub/May–	Low potential to occur. Suitable coastal scrub habitat is present. However, all the occurrences in the region are located within the

Table 3.3-3. Special-Status Plant Species Observed or with Potential to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ^a	Habitat Requirements	Potential to Occur within the BSA
			Aug(Dec–Feb)/33–3,280 feet amsl	foothills and not directly along the coast (CDFW 2020a). This species was not detected during 2018, 2019, or 2021 special-status plant species surveys.
<i>Malacothrix saxatilis</i> var. <i>saxatilis</i>	cliff malacothrix	None/None/4 .2 ^b	Coastal bluff scrub, Coastal scrub/perennial rhizomatous herb/Mar–Sep/10–655 feet amsl	Present. Detected during 2018, 2019, and 2021 special-status plant species surveys.
<i>Muhlenbergia utilis</i>	aparejo grass	None/None/2 B.2	Meadows and seeps, marshes and swamps, chaparral, coastal scrub, cismontane woodland; sometimes alkaline, sometimes serpentinite/perennial rhizomatous herb/Mar–Oct/82–7,625 feet amsl	Low potential to occur. Suitable coastal scrub habitat is present, and the large quantities of quailbush on site indicate that suitable alkaline soils may be present. However, the only occurrence in the region was last confirmed in 1964 and was located west of Matilija Lake (CDFW 2020a).
<i>Phacelia ramosissima</i> var. <i>austrolitoralis</i>	south coast branching phacelia	None/None/3 .2 ^b	Chaparral, Coastal dunes, Coastal scrub, Marshes and swamps (coastal salt); sandy, sometimes rocky/perennial herb/Mar–Aug/16–985 feet amsl	Present. Detected during 2018 or 2019 special-status plant species surveys.
<i>Quercus dumosa</i>	Nuttall's scrub oak	None/None/1 B.1	Closed-cone coniferous forest, Chaparral, Coastal scrub; sandy, clay loam/perennial evergreen shrub/Feb–Apr (May–Aug)/49–1,310 feet amsl	Low potential to occur. Suitable coastal scrub habitat is present, although clay soils are absent (USDA 2020a). The closest occurrence in the region was last confirmed in 1929 and was described as occurring in Carpinteria, and the remaining occurrences in the region are located within the foothills and not directly along the coast (CDFW 2020a). This species was not detected during 2018, 2019, or 2021 special-status plant species surveys.

Table 3.3-3. Special-Status Plant Species Observed or with Potential to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ^a	Habitat Requirements	Potential to Occur within the BSA
<i>Suaeda taxifolia</i>	woolly seablite	None/None/4 .2 ^b	Coastal bluff scrub, Coastal dunes, Marshes and swamps (margins of coastal salt)/perennial evergreen shrub/Jan–Dec/0–165 feet amsl	Present. Detected during 2018 and 2019 special-status plant species surveys.

Notes: amsl = above mean sea level.

^a **Status Legend:**

FE: Federally listed as endangered

SE: State listed as endangered

CRPR 1A: Plants presumed extinct in California

CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere

CRPR 2A: Plants rare, threatened, or endangered in California but common elsewhere

CRPR 2B: Plants rare, threatened, or endangered in California but more common elsewhere

CRPR 3: Plants about which more information is needed – a review list

CRPR 4: Plants of limited distribution – a watch list

.1 Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)

.2 Fairly endangered in California (20% to 80% of occurrences threatened)

.3 Not very endangered in California (less than 20% of occurrences threatened or no current threats known).

^b For the purpose of CEQA analysis, federal, state, and CNPS CRPR 1A, 1B, 2A, and 2B plants are considered special-status. CRPR 3 and 4 plants are not considered special-status as plant species but do add to the vegetation community value designated as County environmentally sensitive habitat and or City environmentally sensitive habitat areas as CNPS CRPR 3 and 4 species.

No federal, state, or CNPS CRPR 1 or 2 plant species were observed. Two CNPS CRPR 4.2 plant species, cliff malacothrix (*Malacothrix saxatilis* var. *saxatilis*) and woolly seablite (*Suaeda taxifolia*), and one CNPS CRPR 3.2 plant species, south coast branching phacelia (*Phacelia ramosissima* var. *austrolitoralis*) were detected within the biological survey area (see Figure 3.3-1). Cliff malacothrix, south coast branching phacelia, and woolly seablite are not included on the Rare Plants of Santa Barbara County list (Wilken 2018); therefore, these are not considered special-status plant species.

Cliff malacothrix (*Malacothrix saxatilis* var. *saxatilis*). This CNPS CRPR 4.2 species is a perennial herb that occurs in coastal bluff scrub and coastal scrub at 10 to 220 feet in elevation. It occurs along the coast from Orange County north to Santa Barbara County, and inland in Kern and San Bernardino Counties and blooms March through September. A total of ~~68,385~~ 70,252 square feet and ~~834~~ 902 individuals were documented (Figure 3.3-1) in the biological survey area.

South coast branching phacelia (*Phacelia ramosissima* var. *austrolitoralis*). This species is a perennial herb that is native to California and included as CNPS CRPR 3.2. It occurs in chaparral, coastal dunes, coastal scrub, marshes and swamps (coastal salt) in sandy sometimes rocky soils and blooms March through August. A total of 14 square feet and 2 individuals were documented (Figure 3.3-1) in the biological survey area.

Woolly seablite (*Suaeda taxifolia*). This CNPS CRPR 4.2 species is found in coastal bluff scrub, coastal dunes, and marshes and swamps at 0 to 165 feet elevation. It occurs along the coast from Orange County north to San Luis Obispo County, as well as on the Channel Islands and blooms January through December, year-round. In the project vicinity, this species is distributed in monotypic patches along the bluffs just west of Rincon Beach County Park, adjacent to the trail alignment (Figure 3.3-1). A total of 75,161 square feet and 617 individuals were documented in the biological survey area.

3.3.1.4 Special-Status Wildlife Species

Wildlife species were documented during the 2011 general biological survey and subsequent vegetation mapping, and special-status plant species surveys during 2018, 2019, and 2021. Additionally, a Dudek biologist documented wildlife observed during the general biological survey conducted in December 2020.

A total of 32 special-status wildlife species (25 birds, two invertebrates, three mammals, and two reptiles) were either directly observed or detected based on vocal cues or observation of sign, included as Appendix C1. The CNDDDB (CDFW 2018, 2020a) and USFWS (USFWS 2020a) queries returned 41 special-status wildlife species that have been documented within the USGS White Ledge Peak 7.5 quadrangle as well as the four coastally influenced adjacent USGS 7.5 minute quadrangles (Ventura, Matilija, Pitas Point, Carpinteria), herein after referred to as the region. Only the four coastally influenced adjacent USGS 7.5-minute quadrangles were queried for sensitive biological resources instead all adjacent quadrangle maps, since the habitats north of the foothills vary greatly from the project site and would not be representative of what species are likely to occur in coastal habitats.

A variety of special-status wildlife have recorded occurrences in the region (i.e., the five 7.5-minute quadrangles queried) and were evaluated for their potential to occur on the project site, including but not limited to the Monarch butterfly (*Danaus plexippus*; Special Animal), tidewater goby (*Eucyclogobius newberryi*; federally endangered [FE]), southern steelhead (*Oncorhynchus mykiss irideus*; FE), California red-legged frog (*Rana draytonii*; federally threatened [FT]), California legless lizard (*Anniella* sp.; California Species of Special Concern [SSC]), two-striped garter snake (*Thamnophis hammondi*; SSC), white-tailed kite (*Elanus leucurus*; state fully protected [FP]); light-footed clapper rail (*Rallus longirostris levipes*; FE, state endangered [SE], FP), snowy plover (*Charadrius nivosus*; FT) and Belding's savannah sparrow (*Passerculus sandwichensis beldingi*; SE). Appendix C2 provides a list of the 31 special-status wildlife species that are not expected to occur based on site surveys, lack of suitable habitat, and the site being out of the species range. The special-status wildlife species in Appendix C2 are not analyzed in this report as no direct, indirect, or cumulative impacts are expected.

Based on Dudek's knowledge of regional biological resources, distribution of local species, and species-specific habitat preferences, 8 of the special-status wildlife species queried had the potential to occur within the project site. These 8 special-status wildlife species include California legless lizard, Blainville's horned lizard (*Phrynosoma blainvillii*), coast patch-nosed snake (*Salvadora hexalepis virgulata*), white-tailed kite, western mastiff bat (*Eumops perotis californicus*), Townsend's big-eared bat (*Corynorhinus townsendii*), San Diego desert woodrat (*Neotoma lepida intermedia*), and the monarch butterfly and their overwintering population (Table 3.3-4).

Table 3.3-4. Special-Status Wildlife Species Observed or with Potential to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ¹ Fed/State/ County/City	Habitat Requirements	Potential to Occur within the BSA
Reptiles				
<i>Anniella</i> sp.	California legless lizard	None/SSC/None/None	Coastal dunes, stabilized dunes, beaches, dry washes, valley-foothill, chaparral, and scrubs; pine, oak, and riparian	Moderate potential to occur. Note that the species of legless lizard occurring in the region is not known (Papenfuss and Parham 2013). Suitable scrub habitat is present,

Table 3.3-4. Special-Status Wildlife Species Observed or with Potential to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ¹ Fed/State/ County/City	Habitat Requirements	Potential to Occur within the BSA
			woodlands; associated with sparse vegetation and sandy or loose, loamy soils	although loose, loamy soils are less abundant within the site due to extensive past grading to form the slopes adjacent to U.S. Highway 101. A 1952 CNDDB occurrence was within the western portion of the project site (CDFW 2020a). The next closest occurrence is located approximately 2 miles northwest of the site at Carpinteria State Beach (CDFW 2020a).
<i>Phrynosoma blainvillii</i>	Blainville's horned lizard	None/SSC/None/None	Open areas of sandy soil in valleys, foothills, and semi-arid mountains including coastal scrub, chaparral, valley-foothill hardwood, conifer, riparian, pine-cypress, juniper, and annual grassland habitats	Low potential to occur. Suitable coastal scrub habitat is present, although there is only one CNDDB occurrence in the region, located approximately 10.5 miles northeast of the site near the Los Robles Diversion Canal (CDFW 2020a).
<i>Salvadora hexalepis virgulata</i>	coast patch-nosed snake	None/SSC/None/None	Brushy or shrubby vegetation; requires small mammal burrows for refuge and overwintering sites	Low potential to occur. Suitable coastal scrub shrubby habitat is present, although all three CNDDB occurrences in the region are located in the montane areas behind the site and not in coastal areas, the closest of which is located approximately 10.5 miles north of the site along E Camino Cielo (CDFW 2020a).
Birds				
<i>Elanus leucurus</i> (nesting)	white-tailed kite	None/FP/ESH/ESHA	Nests in woodland, riparian, and individual trees near open lands; forages opportunistically in grassland, meadows, scrubs, agriculture, emergent wetland, savanna, and disturbed lands	Low potential to nest. Marginally suitable woodland nesting habitat is present in the trees adjacent to the project site near Rincon Beach County Park, within the Rincon Point housing development. This species prefers open grassland or marshland habitats which are not present on site, and is found less commonly in agricultural areas or rights-of-way. This species is known to occur along the south coast, however most foraging and nesting activity in the County is restricted to more rural areas and in particular, the Goleta and Santa Maria Valleys (Lehman 2020).

Table 3.3-4. Special-Status Wildlife Species Observed or with Potential to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ¹ Fed/State/ County/City	Habitat Requirements	Potential to Occur within the BSA
Mammals				
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	None/SSC/None/None	Mesic habitats characterized by coniferous and deciduous forests and riparian habitat, but also xeric areas; roosts in limestone caves and lava tubes, human-made structures, and tunnels	Low potential to occur, not expected to roost. Marginally suitable coastal scrub foraging habitat is present, while suitable roosting habitat is absent on site. There is only one CNDDDB occurrence in the region, last confirmed in 1941 at the Carpinteria Salt Marsh (CDFW 2020a).
<i>Eumops perotis californicus</i>	western mastiff bat	None/SSC/None/None	Chaparral, coastal and desert scrub, coniferous and deciduous forest and woodland; roosts in crevices in rocky canyons and cliffs where the canyon or cliff is vertical or nearly vertical, trees, and tunnels	Low potential to occur, not expected to roost. Suitable coastal scrub foraging habitat is present, while the slopes present on site are not large and far enough away from human disturbance to be suitable roosting habitat. There is only one CNDDDB occurrence in the region, which is located approximately 10 miles east of the site near Weldon (CDFW 2020a).
<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	None/SSC/None/None	Coastal scrub, desert scrub, chaparral, cacti, rocky areas	Moderate potential to occur. Suitable coastal scrub habitat is present, and this species is known to occur along the coast in the region, the closest occurrence of which was last confirmed in 1992 located approximately 2.75 miles southeast of the site just east of Punta Gorda (CDFW 2020a). Additionally, woodrat middens have been observed within the project site during various surveys.
<i>Puma concolor</i> (southern and central coast California evolutionary significant units)	mountain lion	None/SC/None/None	Dense undergrowth and cover in deserts, humid coast forests, arid hillsides, and scrub and oak woodlands.	Low potential to occur. Suitable habitat north and east of the project site across U.S. Highway 101 in the vicinity of State Route 150. This species is known to occur in more rural areas and may access areas east of the project site via Rincon Creek; however, project site access is constricted by U.S. Highway 101 and adjacent chain link fencing along the southbound lanes of the highway, the narrow and frequently used State Route 150, and the beach.

Table 3.3-4. Special-Status Wildlife Species Observed or with Potential to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ¹ Fed/State/ County/City	Habitat Requirements	Potential to Occur within the BSA
Invertebrates				
<i>Danaus plexippus</i>	monarch	FC/None/ESH ² /ESHA ²	Follows a pattern of seasonal migration and the Rocky Mountain population migrates southwest to wintering grounds along the California coast from Mendocino to the Mexico border extending into Baja, California, Mexico. Overwintering populations utilize wind-protected tree groves (typically eucalyptus [<i>Eucalyptus</i> sp.], Monterey cypress [<i>Hesperocyparis macrocarpa</i>], sycamore [<i>Platanus racemosa</i>], and coast live oak [<i>Quercus agrifolia</i>]) with nectar sources and nearby water sources.	Low potential to roost. While there are a few trees located on the project site including Monterey cypress and eucalyptus trees, most are isolated individuals, and none assemble into a woodland large enough to provide protection and other elements required by overwintering monarch butterflies. There is low potential for monarch butterflies to overwinter adjacent to the project site, including the stand of eucalyptus and trees associated with residential development at Rincon Point near Rincon Creek; however, monarch individuals were not observed during surveys and winter roost sites have not been documented in these areas (Xerces Society 2020). There are numerous occurrences in the region, including a stand of eucalyptus trees north of the project site along Rincon Creek and Bates Road north of Highway 101, last confirmed in 2002 (CDFW 2020a).

¹ **Federal Designations:**

- FC Candidate for federal listing as threatened or endangered
- (FD) Federally delisted; monitored for five years
- FE Federally listed Endangered
- FT Federally listed as Threatened
- FDL Federally delisted
- BCC Bird of Conservation Concern

State Designations:

- SC Candidate for state listing as endangered
- SSC Species of Special Concern
- FP California Department of Fish and Game Protected and Fully Protected Species
- SE State listed as Endangered
- ST State listed as Threatened
- SDL State delisted
- WL Watch List

- ² Monarch overwintering sites are protected under County CLUP (County of Santa Barbara 2019) and the City General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003) as County environmentally sensitive habitat and City environmentally sensitive habitat areas.

Two special-status wildlife species were determined to have a moderate potential to occur within the project site, including Northern California legless lizard (SSC) and San Diego desert woodrat (SSC).

California legless lizard. The California legless lizard is a state SSC and is a fossorial lizard that occupies suitable habitats such as coastal dune, valley and foothill grassland, chaparral, and coastal scrub from Contra Costa County south to the Mexico border. This species requires loose, friable soils for burrowing, and often requires moist substrates and environments (CDFW 2020a). This species has been recorded within the project site from a 1952 occurrence along the coastal bluffs near Rincon Road and Rincon Beach County Park (CDFW 2020a). Suitable habitat for this species occurs on site in the coastal scrub and coastal bluff scrub vegetation communities mapped over a large portion of the site

San Diego desert woodrat. The San Diego desert woodrat is a state SSC known to inhabit scrub habitats, such as coastal sage scrub. Its distribution tends to be on the west side of Coast Ranges from San Diego County north to at least San Luis Obispo County. The San Diego desert woodrat prefers moderate to dense canopies, and are particularly abundant in rock outcrops, rocky cliffs, and slopes (CDFW 2020a). Unlike dusky-footed woodrats, San Diego desert woodrats do not construct large stick nests. This species normally occupies openings in rocks, vegetation (such as openings among patches of cactus), and even debris, and sometimes small stick nests are built within an opening or crevice. Suitable habitat for this species occurs on site in the coastal scrub and coastal bluff scrub vegetation communities mapped over a large portion of the site. Woodrat middens have been observed during surveys on site.

White-tailed kite. The white-tailed kite, a state fully protected species, is known to occur in the area (City of Carpinteria 2003), and in addition to protections by the state, the white-tailed kite receives protection under the Santa Barbara County Coastal Land Use Plan (County of Santa Barbara 2019) and the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003). The City specifically cites the Carpinteria Bluffs as a location where this species occurs and is protected. However, no white-tailed kites were detected in the biological survey area, and the scrub vegetation that predominates there is unsuitable for foraging by this species, which hunts in habitats dominated by grasses and forbs. Trees in and around the site are relatively small, and located in areas with high levels of human disturbance where kites are unlikely to nest. Marginally suitable woodland nesting habitat is present in the trees adjacent to the project site near Rincon Beach County Park, within the Rincon Point housing development. This species prefers open grassland or marshland habitats which are not present on site, and is found less commonly in agricultural areas or rights-of-way. This species is known to occur along the south coast, however most foraging and nesting activity in the County is restricted to more rural areas and in particular, the Goleta and Santa Maria Valleys (Lehman 2020).

Monarch butterflies and overwintering sites. Monarch butterflies are currently a federal candidate species, while their overwintering sites are also protected under Santa Barbara County Coastal Land Use Plan (County of Santa Barbara 2019) and the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003) policies. The monarch butterfly follows a pattern of seasonal migration. The summer grounds of the species are found in New England, the Great Lakes region, the northern Rocky Mountains, and some portions of the Arid West (Pelton et al. 2016). The New England and Great Lakes populations generally migrate southwest to wintering grounds in the Sierra Madre mountain range of Mexico, while the Rocky Mountains population generally migrates southwest to wintering grounds along the California coast.

Monarchs require specific conditions for suitable wintering sites, and wintering sites in California are associated with wind-protected groves of large trees (primarily eucalyptus or pine) with nectar and water sources nearby, dappled sunlight, high humidity, and an absence of freezing temperatures or high wind, generally near the coast (Pelton et al. 2016). The majority of trees within the biological survey area are either singular and isolated, or do not form a large enough grove to provide adequate microclimate conditions and wind protection monarch butterflies

require for overwintering sites. There is a small portion of eucalyptus trees within the eastern portion of the biological survey area, however there is low potential for monarchs for overwinter here as well due to the small relative size of this eucalyptus stand and vulnerability to strong winds and weather. There are also three eucalyptus trees present at near the western terminus of the biological survey area, however they each grow individually and do not form a grove capable of supporting overwintering monarchs. Additionally, the eucalyptus trees present along the hills behind the biological survey on private property, specifically the eucalyptus trees around the residential development off Bates Ranch Road as well as the eucalyptus trees that extend beyond the terminus of Camino Carreta, appear to be planted windrows and do not form large protected groves that have the microclimate characteristics monarchs require for overwintering.

Monarch butterflies are known to occur near the biological survey area along Bates Road just north of U.S. Highway 101 in a eucalyptus stand associated with Rincon Creek (CNDDDB Occurrence No. 268; Xerces Site No. 2803) (CDFW 2020a). Additionally, this site was known to have been surveyed for overwintering monarch populations in 2017 during the Xerces Society New Year's Count, of which none were detected (Xerces Society 2020).

3.3.1.5 Critical Habitat

There is no USFWS designated critical habitat for any plant species or wildlife species within or adjacent to the project site (USFWS 2020b).

3.3.1.6 Wildlife Movement Corridors

The project site is located adjacent to the Pacific Ocean and does not connect important habitat areas used by large or small wildlife species. In addition, U.S. Highway 101 and adjacent chain link fencing along the southbound lanes of the highway provide impediments to wildlife movement between the bluffs and more inland areas. Additionally, development and restricted access from more open space areas to the north impede wildlife movement in accessing the project site. Large-sized mammal species such as mountain lion and California black bears (*Ursus americanus californiensis*) may utilize areas to the east of the biological survey area including Rincon Creek and the channelized portion under U.S. Highway 101 to access beach areas; however, the surrounding areas where Rincon Creek daylight is developed with residential homes and parking lot improvements, resulting in a high urban wildlife interface. Medium-sized mammal species such as the striped skunk (*Mephitis mephitis*) or northern raccoon (*Procyon lotor*) may move locally along the coast. The UPRR and associated right-of-way provides an unvegetated corridor approximately 50 feet wide containing a single track that divides the project alignment near its center. The UPRR tracks are at a much lower elevation than the adjacent bluffs creating an anthropogenic valley and break in continuous topography along the bluffs. The project includes a span bridge which connects the two bluffs and ultimately will not change the overall topography for wildlife to approach or cross the tracks. Additionally, minor changes to wind and weather patterns in a very local setting are not an impediment to birds moving long distance, particularly since the overall height of the slope should remain at the same elevation.

To evaluate the change in wind uplift patterns above the bluff face from the proposed regrading for the project, Dudek commissioned an Airflow Analysis for the Proposed Regrading of the Rincon Bluffs study (Airflow Analysis Report Study) by an expert in fluid dynamics; the Airflow Analysis Report Study is included as Appendix I of this Environmental Impact Report. Several different approaches were used, based upon published literature including wind tunnel experiments and direct field measurements of the amplification effects of a slope or vertical face on horizontal wind vectors perpendicular to the slope face. In the published literature reviewed for this Airflow Analysis Report Study, certain investigators compared the average slope angle of the entire slope or bluff face to determine

the wind amplification effect, while others compared the angle of just the upper portion of the slope. The analysis of the effects of the proposed regrading of the bluff face for the project concluded that the proposed regrading could reduce the vertical airflow velocity by 10% to 30% relative to current conditions; for altitudes relevant to paragliding and soaring activities, the reduction may be closer to the maximum reduction of 30% (Appendix I). ~~Based on available experimental results, the introduction of an upper bench above the trail is expected to provide a small increase in turbulence (of the order of 5%) at an altitude of 30 feet above the front of the bluffs, becoming negligible by an altitude of approximately 75 feet (Appendix I).~~ Migratory avian species travel hundreds to thousands of miles at various elevations during which they can be exposed to a variety of weather systems within days or weeks of each other and have behavioral plasticity in response to microscale through mesoscale conditions including extremely adverse weather (Sahmoun-Baranes 2017). The anticipated changes in ~~wind velocity and turbulence~~ would occur within a short linear distance relative to the distance traveled for a migrating avian species, and avian species regularly adjust to changing weather conditions. Additionally, the velocity ~~and turbulence~~ changes would be focused at altitudes near the bluff top and would not extend the whole altitude range for migrating birds.

3.3.1.7 Aquatic Resources

While a delineation of jurisdictional aquatic resources was not performed; no evidence of aquatic features was observed within the biological survey area during field surveys. Additionally, there are no USGS National Hydrography Dataset (USGS 2020) or USFWS National Wetlands Inventory (USFWS 2020b) mapped aquatic resources within the project site. On the adjacent Carpinteria Bluffs III site, to the south and west of the western most portion of the project site, multiple seasonal pools and ephemeral pools have been documented (Sage Institute Inc. 2009; Dudek 2012a, 2012b). As part of the Wetland Determination of Pool Features at Carpinteria Bluffs Area II per the California Coastal Act (Dudek 2012b), jurisdictional determinations for coastal wetlands were made for documented seasonal pools and ephemeral features. No documented coastal wetlands occur within the project site; however, coastal wetlands (Dudek 2012b) are approximately 123 feet from project ~~temporary impacts and 125 feet from project permanent impacts~~. The closest mapped riverine or stream/river feature is associated with the Rincon Creek outlet located approximately 50 feet from the eastern portion of the biological survey area.

3.3.2 Relevant Plans, Policies, and Ordinances

3.3.2.1 Federal

Clean Water Act, Section 404

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into waters of the United States, and regulating quality standards for surface waters. Under the CWA, the U.S. Environmental Protection Agency (USEPA) has implemented pollution control programs such as setting wastewater standards for industry and developing national water quality criteria recommendations for pollutants in surface waters.

The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. USEPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or human-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

Under Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers (USACE) has authority to regulate activities that could discharge fill of material into wetlands or other “waters of the United States.” Perennial and intermittent creeks are considered waters of the United States if they are hydrologically connected to other jurisdictional waters (typically a navigable water). USACE also implements the federal policy embodied in Executive Order 11990, which is intended to result in no net loss of wetland value or acres. In achieving the goals of the Clean Water Act, USACE seeks to avoid adverse impacts and offset unavoidable adverse impacts on existing aquatic resources. Any fill of wetlands that are hydrologically connected to jurisdictional waters would require a permit from USACE prior to the start of work. Typically, when a project involves impacts to waters of the United States, the goal of no net loss of wetland acres or values is met through avoidance and minimization to the extent practicable, followed by compensatory mitigation involving creation or enhancement of similar habitats.

Federal Endangered Species Act

Under the federal Endangered Species Act of 1973 (ESA), the Secretary of the Interior and the Secretary of Commerce jointly have the authority to list a species as threatened or endangered (16 USC 1533[c]). Pursuant to the requirements of the ESA, an agency reviewing a project within its jurisdiction must determine whether any federally listed threatened or endangered species may be present in the planning area, and determine whether the project would have a potentially significant impact on such species. In addition, the agency is required to determine whether the project is likely to jeopardize the continued existence of any species proposed to be listed under the ESA or result in the destruction or adverse modification of critical habitat proposed to be designated for such species (16 USC 1536[3][4]). The U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration National Marine Fisheries Service are responsible for implementation of the ESA.

USFWS also publishes a list of candidate species. Species on this list receive special attention from federal agencies during environmental review, although they are not protected otherwise under the ESA. The candidate species are those for which USFWS has sufficient biological information to support a proposal to list them as endangered or threatened.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act prohibits the take of any migratory bird or any part, nest, or eggs of any such bird. Under the Migratory Bird Treaty Act, “take” is defined as “pursue, hunt, shoot, wound, kill trap, capture, or collect, or any attempt to carry out these activities” (16 USC 703 et seq.). Additionally, Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, requires that any project with federal involvement address impacts of federal actions on migratory birds with the purpose of promoting conservation of migratory bird populations (66 FR 3853–3856). Executive Order 13186 requires federal agencies to work with USFWS to develop a memorandum of understanding. USFWS reviews actions that might affect these species. Currently, birds are considered to be nesting under the Migratory Bird Treaty Act only when there are eggs or chicks that are dependent on the nest.

3.3.2.2 State

California Endangered Species Act

The California ESA establishes state policy to conserve, protect, restore, and enhance threatened or endangered species and their habitats. Under the California ESA, CDFW is responsible for maintaining a list of threatened species and endangered species (California Fish and Game Code, Section 2070). CDFW also maintains a list of

candidate species, which are species that CDFW has formally noticed as under review for addition to the threatened or endangered species list. CDFW also maintains lists of California species of special concern, which serve as watch lists. Pursuant to the requirements of the California ESA, an agency reviewing a proposed project within its jurisdiction must determine whether any state-listed endangered or threatened species may be present in the area, and determine whether the proposed project would have a potentially significant impact on such species. CDFW encourages informal consultation on any proposed project that may impact a candidate species.

California Fish and Game Code

Under the California Fish and Game Code, CDFW provides protection from take for a variety of species, including fully protected species. “Fully protected” is a legal protective designation administered by CDFW and intended to conserve wildlife species that risk extinction within California. Lists have been created for birds, mammals, fish, amphibians, and reptiles.

Birds of prey are protected in California under California Fish and Game Code Section 3503.5. Section 3503.5 states that it is “unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “taking” by CDFW. Section 3511 prohibits take or possession of a fully protected species. In addition, Section 3513 states “It is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory [Bird] Treaty Act.” Any loss of fertile eggs or nesting raptors, or any activities resulting in nest abandonment would constitute a significant impact. Non-raptor native birds receive similar protection under California Fish and Game Code Section 3503. Project impacts to these species would not be considered significant unless the species are known to, or have a high potential to, nest in the area or rely on it for primary foraging.

The Native Plant Protection Act of 1977 (California Fish and Game Code, Section 1900 et seq.) gives CDFW authority to designate state endangered, threatened, and rare plants, and provides specific protection measures for identified populations.

CDFW also protects streams, water bodies, and riparian corridors through the Streambed Alteration Agreement process under Sections 1601–1606 of the California Fish and Game Code. The California Fish and Game Code stipulates that it is “unlawful to substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of any river, stream or lake” without notifying CDFW, incorporating necessary mitigation, and obtaining a Streambed Alteration Agreement. Through policy, CDFW asserts jurisdiction to the top of banks of all streams, including intermittent and ephemeral streams, extending laterally to the upland edge of adjacent riparian vegetation. CDFW uses the Cowardin system for wetland identification and classification, which typically results in a larger jurisdictional area than federal jurisdiction under the Clean Water Act. Under this system, wetlands must have one or more of the following three attributes: (1) at least periodically, the land supports predominantly hydrophytes; (2) the substrate is predominantly undrained hydric soil; and (3) the substrate is nonsoil and is saturated with water or covered by shallow water at some time during the growing season of each year.

3.3.2.3 Local

City of Carpinteria General Plan/Local Coastal Land Use Plan

The City's General Plan/Local Coastal Land Use Plan includes the following objectives and policies relevant to the proposed project and biological resources:

- OSC-1 Protect, Preserve and Enhance Local Natural Resources and Habitats
 - Policy OSC-1a. Protect ESHAs from development and maintain them as natural open space or passive recreational areas.
 - Policy OSC-1b. Prohibit activities, including development, that could damage or destroy ESHA.
 - Policy OSC-1c. Establish and support preservation and restoration programs for ESHA, including but not limited to Carpinteria Creek, Carpinteria Bluffs, Carpinteria Salt Marsh, seal rookery, Carpinteria reef, Pismo clam beds and the intertidal zones along the shoreline.
 - Policy OSC-1d. Property including ESHA should be designated with a zoning category that allows for the protection of, and access to, the resource area, such as Open Space/Recreation or Public Facility zoning. Any development on property including ESHA should be designed and conducted to protect the resources. Within environmentally sensitive habitat only uses dependent upon those resources shall be allowed and the resources shall be protected against any disruption.
 - Policy OSC-1f. Protect and restore degraded wetlands, butterfly habitat, native plant communities, and sensitive, rare, threatened or endangered species habitat on City-owned land to the maximum extent feasible.
- OSC-3 Preserve and Restore Wetlands Such as the Carpinteria Salt Marsh
 - Policy OSC-3a. Wetland delineations shall be based on the definitions contained in Section 13577 (b) of Title 14 of the California Code of Regulations
 - Policy OSC-3b. The upland limit of a wetland is defined as
 - the boundary between land with predominantly hydrophytic cover and land with predominantly mesophytic or xerophytic cover;
 - the boundary between soil that is predominantly hydric and soil that is predominantly non-hydric;
 - in the case of wetlands without vegetation or soils, the boundary between land that is flooded or saturated at some time during years of normal precipitation, and land that is not.
 - If questions exist, the limit shall be determined by a habitat survey made by a qualified biologist in consultation with the California Department of Fish and Game.
 - Policy OSC-3c. Development adjacent to the required buffer around wetlands should not result in adverse impacts including but not limited to sediment runoff, chemical and fertilizer contamination, noise, light pollution and other disturbances.
- OSC-7 Conserve Native Plant Communities.
 - Policy OSC-7b. When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. Structures shall be sited and designed to minimize the impact of grading, paving construction of roads, runoff and erosion on native vegetation. Sensitive resources that exhibit any level of disturbance shall be maintained, and if feasible, restored. New development shall include measures to restore any disturbed or degraded habitat on the project site. Cut and fill slopes and all areas disturbed by construction activities shall be landscaped or revegetated at the completion of

grading. Plantings shall be of native, drought-tolerant plant species consistent with the existing native vegetation on the site. Invasive plant species that tend to supplant native species shall be prohibited.

Santa Barbara County Article II Coastal Zoning Ordinance

Pursuant to PRC Section 30500 of the California Coastal Act of 1976, Santa Barbara County was required to prepare an LCP for portions of the unincorporated areas of Santa Barbara County within the coastal zone. Sections of the Santa Barbara County Article II Zoning Ordinance that may be relevant to the proposed project include Section 35-140, Tree Removal. Section 35-140 regulates the removal of qualifying trees within the coastal zone, and requires Coastal Development Permit (CDP) approval prior to removal of any qualifying tree. A qualifying tree is defined as a tree which is six inches or more in diameter measured four feet above the ground and six feet or more in height and which is 1) located in a County street right-of-way; or 2) located within 50 feet of any major or minor stream except when such trees are removed for agricultural purposes; or 3) oak trees; or 4) used as a habitat by the monarch butterflies. However, a CDP to remove trees in the coastal zone shall only be issued for reasons such as: the trees are dead; the trees prevent the construction of a project for which a CDP has been issued and project redesign is not feasible; the trees are diseased and pose a danger to healthy trees in the immediate vicinity; or the trees are so weakened by age, disease, storm, fire, excavation, removal of adjacent trees, or any injury so as to cause imminent danger to persons or property.

Santa Barbara County Coastal Land Use Plan

The Santa Barbara County Coastal Land Use Plan was partially certified by the Coastal Commission on March 17, 1981, adopted in 1982, and republished June 2019, as the Local Coastal Program for unincorporated Santa Barbara County. It details the rules and regulations of land use within Santa Barbara County's coastal areas. The following policies would apply to the proposed project. Policy 9-37 consists of the same guidelines discussed above in the Santa Barbara County Article II Zoning Ordinance Section 35-97.19, Development Standards for Stream Habitats. Policy 9-38 consists of the same guidelines discussed above in the Santa Barbara County Article II Zoning Ordinance Section 35-97.19.

- Policy 9-36: When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. All development shall be sited, designed, and constructed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion on native vegetation. In particular, grading and paving shall not adversely affect root zone aeration and stability of native trees.
- Policy 9-37: The minimum buffer strip for major streams in rural areas, as defined by the land use plan, shall be presumptively 100 feet, and for streams in urban areas, 50 feet. These minimum buffers may be adjusted upward or downward on a case-by-case basis. The buffer shall be established based on an investigation of the following factors and after consultation with the Department of Fish and Game and Regional Water Quality Control Board in order to protect the biological productivity and water quality of streams:
 - 1) Soil type and stability of stream corridors;
 - 2) How surface water filters into the ground;
 - 3) Slope of the land on either side of the stream; and
 - 4) Location of the 100-year flood plain boundary.

Riparian vegetation shall be protected and shall be included in the buffer. Where riparian vegetation has previously been removed, except for channelization, the buffer shall allow for the reestablishment of riparian vegetation to its prior extent to the greatest degree possible. Riparian vegetation shall be protected

and shall be included in the buffer. Where riparian vegetation has previously been removed, except for channelization, the buffer shall allow for the reestablishment of riparian vegetation to its prior extent to the greatest degree possible.

- Policy 9-38: No structures shall be located within the stream corridor except: public trails, dams for necessary water supply projects, flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development; and other development where the primary function is for the improvement of fish and wildlife habitat. Culverts, fences, pipelines, and bridges (when support structures are located outside the critical habitat) may be permitted when no alternative route/location is feasible. All development shall incorporate the best mitigation measures feasible.

3.3.3 Thresholds of Significance

The County provides types of impacts to biological resources that may be considered significant if the project substantially alters biological resources in the following ways (County of Santa Barbara 2008):

1. Substantially reduce or eliminate species diversity or abundance
2. Substantially reduce or eliminate quantity or quality of nesting areas
3. Substantially limit reproductive capacity through losses of individuals or habitat
4. Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources
5. Substantially limit or fragment range and movement (geographic distribution or animals and/or seed dispersal routes)
6. Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends.

Furthermore, the size, type, and timing of impacts should be considered in assessing the significance of project impacts on biological resources (County of Santa Barbara 2008).

The significance criteria used to evaluate the project impacts to biological resources are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, a significant impact related to biological resources would occur if the project would:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.
- g) Result in cumulatively considerable impacts to biological resources.

3.3.4 Impact Analysis

- a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

For the purpose of CEQA analysis, federal, state, CNPS CRPR 1A, 1B, 2A, and 2B plants, and locally rare plants (Wilken 2018) are considered special-status plant species. CRPR 3 and 4 plants, which are CNPS “rare”, but not considered special-status plant species under CEQA. Yet these plant species do add to the vegetation community value designated as County ESH and or City ESHA as CNPS CRPR 3 and 4 species. No federal, state, or CNPS CRPR 1 or 2 species, or locally rare (Wilken 2018) species were observed. Two CNPS CRPR 4.2 plant species, cliff malacothrix and woolly seablite, and one CNPS CRPR 3.2 plant species, south coast branching phacelia, were detected within the biological survey area. Cliff malacothrix, south coast branching phacelia, and woolly seablite are not included on the Rare Plants of Santa Barbara County list (Wilken 2018) and therefore, are not considered special status plant species.

No special status plant species were observed; thus, impacts to special status plant species would be less than significant. CNPS’ CRPR 4 plant species are of limited distribution or are infrequent throughout a broader area in California, so that their vulnerability or susceptibility to threat appears low at this time, from a statewide perspective as described by the CNPS. Per CNPS, these species warrant regular monitoring for evidence of decline and subsequent transfer to a more sensitive rank.

Cliff malacothrix, CRPR 4.2, is known to occur in coastal bluff scrub and coastal scrub habitats from northern Santa Barbara County south through southern Orange County. It is not considered locally rare in Santa Barbara County (Wilken 2018), but is considered locally rare in Ventura County (Magney 2020). From 1980 to present, there have been 27 recorded observations of this species in Santa Barbara County and Ventura County (Calflora 2021). The recorded observations were along coastal bluffs that have likely not been developed or disturbed since recorded. Although there are an abundance of recorded cliff malacothrix observations in Santa Barbara County, this species is likely under documented and is known to occur in large areas adjacent to the project site and multiple locations along the Santa Barbara County and nearby Ventura County coast. Cliff malacothrix documented within the biological survey area is in habitats similar throughout the range of the species, coastal bluff scrub and coastal scrub habitats on siltstone/shale bedrock. The proposed project lies generally within an elevated marine terrace, which has been subject to extensive grading associated with current and former transportation facilities. The project site is located within Santa Barbara County immediately adjacent to Ventura County, which is well within the known geographic range of this species, northern Santa Barbara County south through southern Orange County. Cliff malacothrix is not included on the BLM Special Status Plants under the jurisdiction of the California State Office as of May 28, 2015 list (USDOI, BLM 2015), USFWS listed plants (USFWS 2021), are not listed or proposed under the ESA (USFS 2005). A total of approximately 418 cliff malacothrix individuals would be impacted by the project, approximately 46% of the individuals within the biological survey area. The project is within the geographic range of the species, cliff malacothrix is not considered locally rare in Santa Barbara County (Wilken 2018), the cliff malacothrix individuals were observed

on areas that were subjected to extensive grading associated with current and former transportation facilities, and the species occurs in coastal bluff scrub and coastal scrub on siltstone/shale bedrock which are common habitats and substrates for this species. Project impacts would not result in declines in cliff malacothrix to transfer to a more sensitive rank; therefore, impacts to cliff malacothrix would be **less than significant**.

Woolly seablite, CRPR 4.2, is known to occur in coastal bluff scrub, coastal dunes, and marshes and swamps (coastal margins) habitats from San Luis Obispo County south through southern San Diego County including the Channel Islands. It is not considered locally rare in Santa Barbara County (Wilken 2018), but is considered locally rare in Ventura County (Magney 2020). From 1980 to present, there have been 47 recorded observations of this species in Santa Barbara County and Ventura County (Calflora 2021). The recorded observations were along coastal bluffs and beach terraces that have likely not been developed or disturbed since recorded. Although there are an abundance of recorded woolly seablite observations in Santa Barbara County and Ventura County, this species is likely under documented and is known to occur in large areas adjacent to the project site and multiple locations along the Santa Barbara County and nearby Ventura County coast. Woolly seablite documented within the biological survey area is in habitats similar throughout the range of the species, coastal bluff scrub and coastal scrub habitats on siltstone/shale bedrock. The proposed project lies generally within an elevated marine terrace, which has been subject to extensive grading associated with current and former transportation facilities. The project site is located within Santa Barbara County immediately adjacent to Ventura County which is well within the known geographic range of this species, San Luis Obispo County south through southern San Diego County. Woolly seablite is not included on the BLM Special Status Plants under the jurisdiction of the California State Office as of May 28, 2015 list (USDOI, BLM 2015), USFWS listed plants (USFWS 2021) that are not listed or proposed under the ESA (USFS 2005). A total of approximately 256 woolly seablite individuals would be impacted by the project, approximately 41% of the individuals within the biological survey area. The project is within the geographic range of the species, woolly seablite is not considered locally rare in Santa Barbara County (Wilken 2018), the woolly seablite individuals were observed on areas that were subjected to extensive grading associated with current and former transportation facilities, and the species occurs in coastal bluff scrub and coastal scrub on siltstone/shale bedrock which are common habitats and substrates for this species. Project impacts would not result in declines in woolly seablite to transfer to a more sensitive rank; therefore, impacts to woolly seablite would be **less than significant**.

CRPR 3 plant species are those species about which more information is needed. Necessary information is lacking to assign these species to one of the other ranks or to reject them.

South coast branching phacelia, CRPR 3.2, is known to occur in chaparral, coastal dunes, coastal scrub, and marshes and swamps (coastal salt) habitats within sandy, sometimes rocky habitats from southern San Luis Obispo County south through central coastal San Diego County. It is not considered locally rare in Santa Barbara County (Wilken 2018), but is considered locally rare in Ventura County (Magney 2020). From 1980 to present, there have been 44 recorded observations of this species in Santa Barbara County and Ventura County (Calflora 2021). The recorded observations were along rivers, within La Purisima Mission State Historic Park, within Burton Mesa Ecological Reserve, and abandoned roads and trails that have likely not been developed or disturbed since recorded. Although there are an abundance of recorded south coast branching phacelia observations in Santa Barbara County and Ventura County, this species is likely under documented and is known to occur in multiple locations along the Santa Barbara County and nearby Ventura County coast. South coast branching phacelia documented within the biological survey area is in habitats similar throughout the range of the species, coastal scrub. The proposed project lies generally within an elevated marine terrace, which has been subject to extensive grading associated with current and former transportation facilities. The project

site is located within Santa Barbara County immediately adjacent to Ventura County which is well within the known geographic range of this species, southern San Luis Obispo County south through central coastal San Diego County. South coast branching phacelia is not included on the BLM Special Status Plants under the jurisdiction of the California State Office as of May 28, 2015 list (USDOL, BLM 2015). USFWS listed plants (USFWS 2021 that are not listed or proposed under the ESA (USFS 2005). The one individual of south coast branching phacelia documented within the biological survey area would be impacted by the project. The project is within the geographic range of the species, south coast branching phacelia is not considered locally rare in Santa Barbara County (Wilken 2018), the south coast branching phacelia individual was observed in an area that was subjected to extensive grading associated with current and former transportation facilities, and the species occurs in coastal scrub on siltstone/shale bedrock which are common habitats and substrates for this species. Project impacts would not result in declines in south coast branching phacelia to transfer to a more sensitive rank; therefore, impacts to south coast branching phacelia would be **less than significant**.

Habitat was documented for two special-status wildlife species, either within or adjacent to the trail alignment: California legless lizard and San Diego desert woodrat. Habitat for the California legless lizard was found in the proposed trail alignment immediately south of the UPRR crossing. California legless lizard individuals could suffer injury or mortality because of grading and other construction activities associated with the project. Therefore, impacts to California legless lizard would be potentially significant absent mitigation. Habitat for the woodrat is located throughout the scrub dominated portions of the site. Woodrat individuals could suffer injury or mortality because of grading and other construction activities. Therefore, impacts to woodrat would be potentially significant absent mitigation. Impacts to these species' habitats would be reduced to **less than significant with implementation of Mitigation Measure (MM) BIO-1 through MM-BIO-4**.

White-tailed kite is known to occur along the south coast, however most foraging and nesting activity in the County is restricted to more rural areas and in particular, the Goleta and Santa Maria Valleys (Lehman 2020). The City specifically cites the Carpinteria Bluffs as a location where white-tailed kites occur and their habitat is protected. However, no white-tailed kites were detected in the biological survey area, and the scrub vegetation that predominates there is unsuitable for foraging by this species, which hunts in habitats dominated by grasses and forbs. This species prefers open grassland or marshland habitats which are not present on site, and is found less commonly in agricultural areas or rights-of-way. Trees in and around the project site are relatively small, and located in areas with high levels of human disturbance where white-tailed kites are unlikely to nest. Marginally suitable woodland nesting habitat is present in the trees adjacent to the project site near Rincon Beach County Park and within the Rincon Point housing development; however, proposed project impacts are greater than 500 feet from these habitats. The trees within the vicinity of Rincon Beach County Park are not planned to be directly impacted. Therefore, impacts to white-tailed kites would be **less than significant**.

Monarchs require specific conditions for suitable wintering sites, and wintering sites in California are associated with wind-protected groves of large trees (primarily eucalyptus or pine) with nectar and water sources nearby, dappled sunlight, high humidity, and an absence of freezing temperatures or high wind, generally near the coast (Pelton et al. 2016). The majority of trees within the project site are either singular and isolated, or do not form a large enough grove to provide adequate microclimate conditions and wind protection monarch butterflies require for overwintering sites. There are three eucalyptus trees present near the western terminus of the project site, however they each grow individually and do not form a grove capable of supporting overwintering monarchs. There is a small portion of eucalyptus trees within the eastern portion of the biological survey area, however there is low potential for monarchs to overwinter here as well due to the small relative size of this eucalyptus stand and vulnerability to strong winds and weather. The easternmost proposed project impacts are over 1,000 feet from

these eucalyptus trees. Additionally, the eucalyptus trees present along the hills behind the project site on private property, specifically the eucalyptus trees around the residential development off Bates Ranch Road as well as the eucalyptus trees that extend beyond the terminus of Camino Carreta, appear to be planted windrows and do not form large protected groves that have the microclimate characteristics monarchs require for overwintering.

Monarch butterflies are known to occur near the project site along Bates Road just north of U.S. Highway 101 in a eucalyptus stand associated with Rincon Creek (CNDDDB Occurrence No. 268; Xerces Site No. 2803) (CDFW 2020a). Additionally, this site was known to have been surveyed for overwintering monarch populations in 2017 during the Xerces Society New Year's Count, of which none were detected (Xerces Society 2020). While this population is not within 100 feet of the project site, it conceivably could be affected by project implementation due to changed weather patterns. However, no impacts to this monarch overwintering site are anticipated since the overall height of the slope within Rincon Beach County Park south of Highway 101 will not be reduced, as work includes proposed terraces to stabilize the hill but will not decrease its overall height, and therefore no changes to the wind conditions at the overwintering site are expected. Additionally, this overwintering site is largely protected by the hill below the single residential development at 637 Bates Road, and any possible changes to weather and wind patterns due to project implementation would not affect the protective contour this hill independently provides. Therefore, monarch butterflies are not anticipated to be affected since there is low potential for the project site to support overwintering populations, and because known overwintering populations in the vicinity would not be adversely affected due to project implementation. Therefore, impacts to monarch butterfly individuals and monarch butterfly overwintering sites would be **less than significant**.

Several trees, including eucalyptus, Monterey cypress, pine, are located within the proposed trail alignment near its western terminus and U.S. Highway 101. These trees are relatively small and located in areas with high levels of human disturbance including U.S. Highway 101 vehicular traffic and pedestrian use of Carpinteria Avenue and adjacent areas. These isolated and singular trees lack dense foliage and are located in areas vulnerable to strong winds and weather. Several myoporum trees are located within the proposed trail alignment and are largely multistemmed. The myoporum located directly adjacent to the unsanctioned trail experiences high levels of human disturbance. Due to the locations of these trees in areas with high levels of human disturbance, relatively small size of these trees, isolated nature of the trees, and vulnerability to strong winds and weather, raptors are unlikely to nest in these trees. Therefore, removal of these trees would not substantially reduce or eliminate the quantity or quality of raptor nesting areas and impacts would be **less than significant**.

Additionally, a stand of trees is present at the eastern terminus of the biological survey area, which are rooted next to the Rincon Beach County Park parking lot. The eastern most proposed project impacts are over 1,000 feet from this stand of trees. The trees within the vicinity of Rincon Beach County Park are not planned to be directly impacted. Therefore, project impacts to raptor nesting trees would not substantially reduce or eliminate the quantity or quality of nesting areas and impacts to nesting trees would be **less than significant**.

b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

As discussed in Section 3.1.1.2, five native scrub communities ([California brittle bush – ashy buckwheat scrub alliance, *Encelia californica* association], [quailbush scrub alliance, *Atriplex lentiformis* association], [coastal sage scrub: California sagebrush – (purple sage) scrub alliance, *Artemisia californica* association], [coyote brush scrub alliance, *Baccharis pilularis* association], and [lemonade berry scrub alliance, *Rhus integrifolia* association]) are

found in the proposed trail alignment and adjacent areas. These five native scrub communities are designated sensitive by CDFW, County ESH by definition (coastal bluff scrub or coastal sage scrub habitat) or supporting sensitive species, and/or City ESHA by definition (coastal bluff scrub or coastal sage scrub habitat), mapped as ESHA by the City, or supporting sensitive species, as described in Table 3.3-5.

Communities impacted by the proposed project are shown in Table 3.3-5, below, and include California brittle bush – ashy buckwheat scrub alliance, *Encelia californica* association (0.42 acres permanent impacts) and quailbush scrub alliance, *Atriplex lentiformis* association (1.73 acres permanent impacts) as well as coastal sage scrub: California sagebrush – (purple sage) scrub alliance, *Artemisia californica* association (1.29 acres permanent impacts), coyote brush scrub alliance, *Baccharis pilularis* association (0.71 acres permanent impacts), and lemonade berry scrub alliance, *Rhus integrifolia* association (0.17 acres permanent impacts).

Table 3.3-5. Permanent Impacts to Sensitive Native Vegetation Communities

Vegetation Community Alliance, Association	Alliance-Association (State Sensitive)/ County ESH/ City ESHA	Permanent Impacts (acres)
Coastal Bluff Scrub		
California Brittle Bush – Ashy Buckwheat Scrub Alliance, <i>Encelia californica</i> Association	S3-Yes (Yes)/Yes/Yes	0.42
Quailbush Scrub Alliance, <i>Atriplex lentiformis</i> Association	S4-No (No)/Yes/Yes	1.73
Coastal Bluff Scrub Subtotal		2.15
Coastal Scrub		
California Sagebrush – (Purple Sage) Scrub Alliance, <i>Artemisia californica</i> Association	S5-S4 (No)/Yes/Yes	1.29
Coyote Brush Scrub Alliance, <i>Baccharis pilularis</i> Association	S5-No (No)/Yes/Yes	0.71
Lemonade Berry Scrub Alliance, <i>Rhus integrifolia</i> Association	S3-S3 (Yes)/Yes/Yes	0.17
Coastal Scrub Subtotal		2.17
Total		4.32

As shown in Table 3.3-5, approximately ~~3.55~~ 4.32 acres of CDFW sensitive, County ESH, and/or City ESHA habitats ~~would be temporarily impacted due to construction. An additional 0.76~~ 4.32 acres of CDFW sensitive, County ESH, and/or City ESHA habitats would be permanently impacted due to construction. These native plant communities are considered CDFW sensitive, County ESH, and/or City ESHA and protected under County CLUP (County of Santa Barbara 2019) and the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003) policies. Therefore, the proposed project would result in a substantial adverse effect on a sensitive natural community, and impacts would be potentially significant.

County CLUP (County of Santa Barbara 2019) and the City of Carpinteria General Plan and Local Coastal Plan (City of Carpinteria 2003) policies require County ESH and City ESHA avoidance. With implementation of **MM-BIO-1**, **MM-BIO-2**, **MM-BIO-5**, and **MM-BIO-6** impacts would be reduced to **less than significant with mitigation**.

- c) ***Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

As discussed in Section 3.1.1.8, above, no jurisdictional aquatic resources were detected at the biological survey area during the field survey. Therefore, no direct impacts to jurisdictional aquatic resources would occur. On the adjacent Carpinteria Bluffs III site, to the south and west of the westernmost portion of the project site, multiple seasonal pools and ephemeral pools have been documented (Sage Institute Inc. 2009; Dudek 2012a, 2012b). As part of the Wetland Determination of Pool Features at Carpinteria Bluffs Area II per the California Coastal Act (Dudek 2012b), jurisdictional determinations for coastal wetlands were made for documented seasonal pools and ephemeral features. These coastal wetlands (Dudek 2012b) are approximately 123 feet from project temporary impacts and 125 feet from project permanent impacts. The closest mapped riverine or stream/river feature is associated with the Rincon Creek outlet located approximately 50 feet from the eastern portion of the biological survey area and over 1,000 feet from the eastern terminus of proposed impacts. The existing developed areas near this portion of Rincon Creek included the Rincon Beach County Park asphalt parking lot and associated developments of a standard curb, vegetation, paved Rincon Point Lane, and additional vegetation.

The City of Carpinteria General Plan and Local Coastal Plan (City of Carpinteria 2003) includes implementation policies associated with wetlands which state, “*Maintain a minimum 100-foot setback/buffer strip in a natural condition along the upland limits of all wetlands. No structures other than those required to support light recreational, scientific and educational uses shall be permitted within the setback, where such structures are consistent with all other wetland development policies and where all feasible measures have been taken to prevent adverse impacts. The minimum setback may be adjusted upward to account for site-specific conditions affecting avoidance of adverse impacts.*”

Project impacts, both temporary and permanent, are greater than 100 feet from known coastal wetlands near the western terminus of the project and greater than 1,000 feet from Rincon Creek near the eastern terminus of the project. Therefore, the project would not have a substantial adverse effect on coastal wetlands including creeks and no impact would occur.

- d) ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

As discussed in Section 3.1.1.7, the proposed trail alignment is located adjacent to the Pacific Ocean and does not connect important habitat areas used by large or small terrestrial wildlife species. In addition, U.S. Highway 101 and the chain link fence adjacent to the southbound lanes of the highway provide impediments to movement of larger and medium-sized wildlife. Additionally, development and restricted access from more open space areas to the north impede wildlife movement in accessing the project site. Large-sized mammal species such as mountain lion and California black bears (*Ursus americanus californiensis*) may utilize areas to the east of the biological survey area including Rincon Creek and the channelized portion under U.S. Highway 101 to access beach areas; however, the surrounding areas where Rincon Creek daylight is developed with residential homes and parking lot improvements, resulting in a high urban wildlife interface. Medium-sized mammal species such as the striped skunk (*Mephitis mephitis*) or northern raccoon (*Procyon lotor*) may occasionally use the opening provided by the trail to move locally along the coast. The trail may provide some hazard to common, smaller terrestrial species such as the western fence lizard (*Sceloporus occidentalis*), common side-blotched lizard (*Uta*

stansburiana) and California pocket mouse (*Chaetodipus californicus*), but the trail and associated fencing will not present a physical barrier to their movement.

Concerning avian species, minor changes to wind and weather patterns in a very local setting are not an impediment to birds moving long distance, particularly since the overall height of the slope should remain at the same elevation. As identified in the Airflow Study (Appendix I), the analysis of the effects of the proposed regrading of the bluff face for the project concluded that the proposed regrading could reduce the vertical airflow velocity by 10% to 30% relative to current conditions; for altitudes relevant to paragliding and soaring activities, the reduction is expected to be closer to 30%. ~~Based on available experimental results, the introduction of an upper bench above the trail is expected to provide a small increase in turbulence (of the order of 5%) at an altitude of 30 feet above the front of the bluffs, becoming negligible by an altitude of approximately 75 feet.~~ Migrating avian species may experience reduced airflow velocity by approximately 30% ~~and an increase in turbulence (of the order of 5%)~~ at an altitude of 30 feet above the front of the bluffs. Migratory avian species travel hundreds to thousands of miles at various elevations during which they can be exposed to a variety of weather systems within days or weeks of each other and have behavioral plasticity in response to microscale through mesoscale conditions including extremely adverse weather (Sahmoun-Baranes 2017). The anticipated changes in velocity and turbulence would occur within a short linear distance relative to the distance traveled for a migrating avian species, and avian species regularly adjust to changing weather conditions. Additionally, the velocity and turbulence changes would be focused at altitudes near the bluff top and would not extend the whole altitude range for migrating birds. Therefore, changes in topography associated with regrading would not substantially impact migratory avian species and impacts would be **less than significant**.

In addition, as discussed under Threshold a, above, 22 species of native birds were detected on site, including several with the potential to nest there. Nests, eggs and nestlings of all native bird species are protected by the Migratory Bird Treaty Act and the California Fish and Game Code. Vegetation clearing and grading, if occurring during the nesting season (typically mid-February to August), have the potential to destroy nests, eggs and nestlings, which could violate these regulations. Therefore, the project impacts to nesting birds from project disturbances would be potentially significant. With implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-7**, project impacts would be reduced to **less than significant with mitigation**.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As discussed in Section 3.1.1.4, three Monterey cypress trees (*Hesperocyparis macrocarpa*), a species native to California but not to the project region, exist on or near the proposed alignment, or within the ~~temporary grading~~ impact area. This includes a single tree near the western terminus of the project site near the pull-out off Carpinteria Ave., a single tree at the edge of the ~~temporary disturbance grading impact~~ area near disturbed habitat in the western half of the project, and a single tree adjacent to the myoporum grove along an unsanctioned trail within Rincon Beach County Park. Additionally, two newly planted pine saplings (*Pinus* sp.) exist near the edge of the ~~temporary disturbance grading impact~~ area in the western portion of the project, both of which were under 3 inches diameter measured 4 feet from the ground and were installed with supportive stakes and mulch. Several eucalyptus (*Eucalyptus* sp.) are adjacent to the western portions of the proposed trail, located within the City, as well as exist near the eastern terminus of the biological survey area overhanging the Rincon Beach County Park parking lot. All of the trees described above are not native or naturally occurring in the region, therefore they should not be considered native trees under Policy 9.36 of the Santa Barbara County Coastal Land Use Plan (County of Santa Barbara 2019).

Furthermore, the only trees on site that meet the definition for qualifying trees under the Santa Barbara County Article II Coastal Zoning Ordinance, are the few eucalyptus trees located at the eastern terminus of the biological survey area, the canopies of which spread across the Rincon Beach County Park parking lot. These few trees are large enough and are located within 50 feet of Rincon Creek satisfying the definition for a qualifying tree. Note that Rincon Creek is outside the biological survey area and greater than 1,000 feet from proposed project impacts. The trees associated with Rincon Creek and trees south of the Rincon Beach County Park parking lot are not proposed to be impacted or altered in any way, and thus the project would not conflict with the Coastal Zoning Ordinance. None of the other trees on site meet the definition of a qualifying trees under the Santa Barbara County Article II Coastal Zoning Ordinance as they are not located in a County street right-of-way, located within 50 feet of any major or minor stream, oak trees or used as a habitat by the monarch butterflies. In addition, none of the trees identified on site are not a part of any windbreak on the Carpinteria Bluffs, which are protected under the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003). Therefore, the project does not conflict with any local tree preservation policy and impacts to trees would be **less than significant**.

White-tailed kite is known to occur along the south coast, however, most foraging and nesting activity in the County is restricted to more rural areas and in particular, the Goleta and Santa Maria Valleys (Lehman 2020). The City specifically cites the Carpinteria Bluffs as a location where white-tailed kites occur and their habitat is protected. However, no white-tailed kites were detected in the biological survey area, and the scrub vegetation that predominates there is unsuitable for foraging by this species, which hunts in habitats dominated by grasses and forbs. This species prefers open grassland or marshland habitats which are not present on site, and is found less commonly in agricultural areas or rights-of-way. Trees in and around the project site are relatively small, and located in areas with high levels of human disturbance where white-tailed kites are unlikely to nest. Marginally suitable woodland nesting habitat is present in the trees adjacent to the project site near Rincon Beach County Park and within the Rincon Point housing development; however, proposed project impacts are greater than 500 feet from these habitats. The trees within the vicinity of Rincon Beach County Park are not planned to be directly impacted. Therefore, impacts to white-tailed kites would be **less than significant**.

Monarchs require specific conditions for suitable wintering sites, and wintering sites in California are associated with wind-protected groves of large trees (primarily eucalyptus or pine) with nectar and water sources nearby, dappled sunlight, high humidity, and an absence of freezing temperatures or high wind, generally near the coast (Pelton et al. 2016). The majority of trees within the project site are either singular and isolated, or do not form a large enough grove to provide adequate microclimate conditions and wind protection monarch butterflies require for overwintering sites. There are three eucalyptus trees present near the western terminus of the project site, however they each grow individually and do not form a grove capable of supporting overwintering monarchs. There is a small portion of eucalyptus trees within the eastern portion of the biological survey area, however, there is low potential for monarchs to overwinter here as well due to the small relative size of this eucalyptus stand and vulnerability to strong winds and weather. The easternmost proposed project impacts are over 1,000 feet from these eucalyptus trees. Additionally, the eucalyptus trees present along the hills behind the project sit on private property, specifically the eucalyptus trees around the residential development off Bates Ranch Road as well as the eucalyptus trees that extend beyond the terminus of Camino Carreta, appear to be planted windrows and do not form large protected groves that have the microclimate characteristics monarchs require for overwintering.

Monarch butterflies are known to occur near the project site along Bates Road just north of U.S. Highway 101 in a eucalyptus stand associated with Rincon Creek (CNDDB Occurrence No. 268; Xerces Site No. 2803) (CDFW 2020a). Additionally, this site was known to have been surveyed for overwintering monarch populations in 2017 during the Xerces Society New Year's Count, of which none were detected (Xerces Society 2020). While this

population is not within 100 feet of the project site, it could be affected by project implementation due to changed weather patterns. However, no impacts to this monarch overwintering site is anticipated since the overall height of the slope within Rincon Beach County Park south of U.S. Highway 101 will not be reduced, as work includes proposed terraces to stabilize the hill but will not decrease its overall height, and therefore no changes to the wind conditions at the overwintering site are expected. Additionally, this overwintering site is largely protected by the hill below the single residential development at 637 Bates Road, and any possible changes to weather and wind patterns due to project implementation would not affect the protective contour this hill independently provides. Therefore, monarch butterflies are not anticipated to be affected since there is low potential for the project site to support overwintering populations, and because known overwintering populations in the vicinity would not be adversely affected due to project implementation. Therefore, impacts to monarch butterfly individuals and monarch butterfly overwintering sites would be **less than significant**.

Several trees, including eucalyptus, Monterey cypress, and pine, are located within the proposed trail alignment near its western terminus and U.S. Highway 101. These trees are relatively small and located in areas with high levels of human disturbance including U.S. Highway 101 vehicular traffic and pedestrian use of Carpinteria Avenue and adjacent areas. These isolated and singular trees lack dense foliage and are located in areas vulnerable to strong winds and weather. Several myoporum trees are located within the proposed trail alignment and are largely multistemmed. The myoporum located directly adjacent to the unsanctioned trail experiences high levels of human disturbance. Due to the locations of these trees in areas with high levels of human disturbance, relatively small size of these trees, isolated nature of the trees, and vulnerability to strong winds and weather, raptors are unlikely to nest in these trees. Therefore, removal of these trees would not substantially reduce or eliminate quantity or quality of raptor nesting areas and impacts would be **less than significant**.

Additionally, a stand of trees is present at the eastern terminus of the biological survey area, which are rooted next to the Rincon Beach County Park parking lot. The easternmost proposed project impacts are over 1,000 feet from this stand of trees. The trees within the vicinity of Rincon Beach County Park are not planned to be directly impacted. Therefore, project impacts to raptor nesting trees would not substantially reduce or eliminate quantity or quality of nesting areas and impacts to nesting trees would be **less than significant**.

County environmentally sensitive habitat (ESH) and City environmentally sensitive habitat areas (ESHA) were evaluated based on definitions in the County *Coastal Land Use Plan* (CLUP) (County of Santa Barbara 2019) and the *City of Carpinteria General Plan and Local Coastal Plan* (City of Carpinteria 2003). As shown in Table 3.3-5, approximately ~~3.55 acres of CDFW sensitive, County ESH, and/or City ESHA habitats would be temporarily impacted due to construction. An additional 0.76~~ 4.32 acres of CDFW sensitive, County ESH, and/or City ESHA habitats would be permanently impacted due to construction. These native plant communities are considered CDFW sensitive, County ESH, and/or City ESHA and protected under County CLUP (County of Santa Barbara 2019) and the City's General Plan/Local Coastal Land Use Plan (City of Carpinteria 2003) policies. Therefore, the proposed project would result in a substantial adverse effect on a sensitive natural community, and impacts would be potentially significant. County CLUP (County of Santa Barbara 2019) and the City of Carpinteria General Plan and Local Coastal Plan (City of Carpinteria 2003) policies require County ESH and City ESHA avoidance. With implementation of **MM-BIO-1, MM-BIO-2, MM-BIO-5, and MM-BIO-6** impacts would be reduced to **less than significant with mitigation**.

As discussed in Section 3.1.1.8, above, no jurisdictional aquatic resources were detected in the biological survey area during the field survey. Therefore, no direct impacts to jurisdictional aquatic resources would occur. On the adjacent Carpinteria Bluffs III site, to the south and west of the western most portion of the project site, multiple

seasonal pools and ephemeral pools have been documented (Sage Institute Inc. 2009; Dudek 2012a, 2012b). As part of the Wetland Determination of Pool Features at Carpinteria Bluffs Area II per the California Coastal Act (Dudek 2012b), jurisdictional determinations for coastal wetlands were made for documented seasonal pools and ephemeral features. These coastal wetlands (Dudek 2012b) are approximately 123 feet from project ~~temporary impacts and 125 feet from project permanent impacts~~. The closest mapped riverine or stream/river feature is associated with the Rincon Creek outlet located approximately 50 feet from the eastern portion of the biological survey area and over 1,000 feet from the eastern terminus of proposed impacts. The existing developed areas near this portion of Rincon Creek included the Rincon Beach County Park asphalt parking lot and associated developments of a standard curb, vegetation, paved Rincon Point Lane, and additional vegetation.

The City of Carpinteria General Plan and Local Coastal Plan (City of Carpinteria 2003) includes implementation policies associated with wetlands which state, *Maintain a minimum 100-foot setback/buffer strip in a natural condition along the upland limits of all wetlands. No structures other than those required to support light recreational, scientific and educational uses shall be permitted within the setback, where such structures are consistent with all other wetland development policies and where all feasible measures have been taken to prevent adverse impacts. The minimum setback may be adjusted upward to account for site-specific conditions affecting avoidance of adverse impacts.*

Project impacts, ~~both temporary and permanent~~, are greater than 100 feet from known coastal wetlands near the western terminus of the project and greater than 1,000 feet from Rincon Creek near the eastern terminus of the project. Therefore, the project would not have a substantial adverse effect on coastal wetlands including creeks and **no impact** would occur.

f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No habitat conservation plans apply to the project area (CDFW 2019). **No impact** would occur.

g) *Would the project result in cumulatively considerable impacts to biological resources?*

The surrounding land uses of the project site include transportation, open space, residential development, and recreational facilities. While the project site is primarily composed of undeveloped lands, they have been previously subject to extensive grading to form the terraces and slopes that abut U.S. Highway 101 to the north and UPRR which bisects the site. The coastal bluffs west of the project site are moderately trafficked areas used for recreation, walking, and biking. In 2017, The Land Trust for Santa Barbara County partnered with the Citizens for the Carpinteria Bluffs, the City of Carpinteria, the County of Santa Barbara, and over a thousand community members to purchase, initiate restoration, and ensure long-term maintenance of the Carpinteria Bluffs III property (also referred to as Rincon Bluffs Preserve), the 21-acre property directly to the west of the project site. A conservation easement of the Carpinteria Bluffs III property/Rincon Bluffs Preserve has been recorded which provides permanent preservation and provides long-term conservation of the open space, scenery, habitat for native plants and animals, and coastal access and recreational opportunities. And within the eastern portion of the project site, the currently developed Rincon Beach County Park provides infrastructure for recreation and is highly utilized. Areas to the south are associated with undeveloped beach areas and the Pacific Ocean. As discussed in Section 3.1.1.7, the proposed trail alignment is located adjacent to the Pacific Ocean and does not connect important habitat areas used by large or small terrestrial wildlife species, and minor changes to wind and weather patterns in a very local setting are not an impediment to birds moving long distance, particularly since

the overall height of the slope would remain at the same elevation. Mitigation measures have been identified to reduce potential impacts to special-status wildlife species and sensitive vegetation communities to less-than-significant levels. Therefore, cumulative impacts resulting from the proposed project, in combination with the reasonably foreseeable future projects in the area, would be less-than-significant.

3.3.5 Mitigation

MM-BIO-1 Workers Environmental Awareness Program (WEAP). The City shall fund an approved biologist to prepare and implement a worker education and awareness program (WEAP) specific to the project. The program shall be presented to all individuals involved in the construction of the project. The program shall include information focused on sensitive vegetation communities, sensitive wildlife and plant species, and common wildlife species and their habitats and shall include, but not be limited to, the following:

- Description of sensitive vegetation communities.
- Workers shall be provided with photographs of sensitive biological resources including sensitive wildlife and plant species.
- Workers shall be informed verbally and in writing of the various project tasks that require biological surveys and monitoring for resource protection.
- Workers shall be provided with a photograph or description of the markers for active bird nests, trees, or other mitigation areas, so that they shall know these are not to be disturbed without a biological monitor present.
- Workers shall be informed not to litter. All trash and litter shall be picked up and removed from the construction sites at the end of each day.
- Workers shall be informed to obey a speed limit of 15 miles per hour while traveling on the project site to avoid collisions with wildlife.
- Workers shall avoid driving over or otherwise disturbing areas outside the designated construction areas.

Plan Requirements and Timing: The applicant shall submit the WEAP to the City of Carpinteria (City) and County of Santa Barbara (County) for review and approval prior to ~~implementation~~ issuance of zoning clearance. All workers, contractors, and visitors shall attend the WEAP prior to entering the project site and performing any work. The applicant shall provide copies of the training attendance sheets to City of Carpinteria and County staff as a record of compliance with this measure on a monthly basis. The WEAP shall be reviewed and approved by the City of Carpinteria and County prior to Zoning Clearance approval. Implementation of the WEAP training shall occur prior to the start of construction and as new crew members are added to the project.

Monitoring: The City of Carpinteria and County permit compliance staff will ensure compliance with the WEAP throughout construction by review of attendance sheets and hardhats, inspection of the site, and interviewing workers, as appropriate.

MM-BIO-2 Fencing. To prevent inadvertent impacts on adjacent sensitive vegetation communities including County ESH and City ESHA, native vegetation, special-status species, and common wildlife species and their habitats, construction limits will be fenced with highly visible fencing and staked. Wildlife-safe highly visible construction fencing shall be installed to identify the limits of grading/disturbance,

which would reduce potential human trampling outside of the construction limits and minimize the potential spread of non-native weeds or invasive plant species. Wildlife-safe construction fencing and flagging shall remain in place during construction and replaced as needed.

Plan Requirements and Timing: The detailed fencing plan, showing the location of required fencing shall be reviewed and approved by City of Carpinteria and County staff prior to Zoning Clearance approval. This condition shall be printed on all project plans. The detailed fencing plan, showing the location of fencing shall be submitted to City of Carpinteria and County staff for review and approval prior to Zoning Clearance approval. The fence shall be installed prior to the start of ground disturbing activities.

Monitoring: The City of Carpinteria and County staff will inspect the project plans and site, to ensure compliance with this measure as appropriate.

MM-BIO-3

Pre-construction California Legless Lizard Survey and Relocation. Prior to initiation of construction, capture and relocation efforts for California legless lizards shall be conducted. Trapping shall be conducted by a qualified biologist and shall include the following steps:

1. Prior to initiation of capture and relocation, a suitable receptor site shall be located. This site shall include areas with loose, moist soils occurring in scrub habitat with high coverage of deerweed (*Lotus scoparius*) or California goldenbush, in arroyo willow (*Salix lasiolepis*) thickets or in other suitable scrub or woodland habitat.
2. Capture and relocation shall take place no more than five days prior to the initiation of construction.
3. These surveys shall be performed by lightly raking loose soil, sand and leaf litter with a wooden rake for a sufficient period to determine that no legless lizards are present, or all legless lizards have been captured.
4. Any lizards found shall be placed in a receptacle with sand and a wet towel and relocated to the previously designated receptor site.

Plan Requirements and Timing: Prior to initiation of construction, capture and relocation efforts for California legless lizards shall be conducted where appropriate. Trapping shall be conducted by a qualified biologist.

Monitoring: The City of Carpinteria and County staff shall ensure the pre-construction survey and relocation efforts, if required, are completed prior to commencement of any earth-moving activities.

MM-BIO-4

Pre-construction Woodrat Survey and Relocation. Prior to initiation of construction, capture and relocation efforts for woodrat shall be conducted. Trapping shall be conducted by a qualified biologist and shall include the following steps:

1. Prior to initiation of capture and relocation, a suitable receptor site shall be located. This site shall be within similar habitat and an adequate distance away from any locations that might be subject to increased human disturbance, such as adjacent to a walking path.
2. These pre-construction surveys shall be performed searching all coastal sage scrub or coastal bluff scrub within the disturbance area for middens or other sign of the species.
3. Any middens and woodrats found shall be live-trapped and relocated to the pre-determined receptor site. The midden shall be dismantled and the materials placed at the relocation site.

Plan Requirements and Timing: Prior to initiation of construction, capture and relocation efforts for woodrat shall be conducted where appropriate. Trapping shall be conducted by a qualified biologist.

Monitoring: The City of Carpinteria and County staff shall ensure the pre-construction survey and relocation efforts, if required, are completed prior to commencement of any earth-moving activities.

MM-BIO-5

Habitat Mitigation and Monitoring Plan. Prior to ~~issuance of zoning clearance approval of a coastal development permit~~, the City shall contract with a qualified biologist to develop a Habitat Mitigation and Monitoring ~~Reporting~~ Plan (Plan) to mitigate for impacts to County ESH/City ESHA vegetation communities. The Plan shall outline efforts to restore or enhance coastal sage scrub and coastal bluff scrub communities, and, therefore, preserve or provide wildlife habitat, in areas impacted by construction of the trail but outside the trail-related impervious surfaces and within similar habitats adjacent to the impacted biological resources. The Plan may focus on the following:

- In-kind, on-site restoration of areas where coastal sage scrub or coastal bluff scrub has been removed;
- Enhancement of ~~temporarily~~ impacted areas on site currently occupied by ornamental, disturbed or developed areas;
- Restoration of areas occupied by non-native habitats or native habitats with large components of non-native vegetation, within similar habitats adjacent to the impacted biological resources.

A total of 4.32 acres of impacts are proposed to County ESH/City ESHA native vegetation communities. Under the Plan, impacts to S3/County ESH/City ESHA native vegetation communities (California brittle bush – ashy buckwheat scrub alliance, *Encelia californica* association and lemonade berry scrub alliance, *Rhus integrifolia* association) that total 0.59 acres shall be restored in-kind at 4:1. Impacts to S4 and S5/County ESH/City ESHA native vegetation communities (quailbush scrub alliance, *Atriplex lentiformis* association, California sagebrush – (purple sage) scrub alliance, *Artemisia californica* association, and coyote brush scrub alliance, *Baccharis pilularis* association) that total 3.73 acres shall be restored in-kind at 2:1. To the extent feasible, restoration should occur on site and, any additional mitigation required shall be carried out on areas within adjacent land controlled by the County or City, such as the Rincon Bluffs Preserve or Rincon Beach County Park.

A qualified biologist/botanist shall develop the Plan, which shall provide specific measures to restore or enhance habitat to replace the loss of coastal sage scrub and coastal bluff scrub communities. This Plan shall be focused on adaptive management principles, and shall identify detailed enhancement areas and strategies based on the parameters outlined below, with long-term timing and monitoring requirements. The Plan shall:

1. Provide an up-to-date inventory of on-site native vegetation resources.
2. Define attainable and measurable goals and objectives to achieve through implementation of the Plan. Goals and objectives shall focus on replacement of coastal sage scrub, coastal bluff scrub and rare plants removed during construction.
3. Provide site selection and justification. Prior to identifying habitat restoration mitigation areas, both within the project area and adjacent lands, the habitat shall be surveyed for sensitive vegetation communities and special-status plant species, to ensure avoidance of impacts during habitat restoration implementation. Additionally, potential adjacent mitigation

lands shall be assessed to ensure sites are suitable and appropriate for implementation of habitat restoration for the impacted native vegetation communities.

4. Detail a restoration work plan including methodologies, restoration schedule, plant materials (seed and container plant) sourcing – locally genetic stock, and implementation strategies.
5. Provide a detailed maintenance plan to include removal of invasive non-native species.
6. Define annual and final performance standards. Prior to grading, the project-related native coastal bluff scrub and coastal scrub vegetation communities shall be assessed by vegetation community type for percent cover (both basal and vegetative), species diversity, density, and abundance. This project site native vegetation community data shall be used to define performance standards for native habitat restoration by vegetation layers (tree, shrub, grass, and forb) for each vegetation community type and for non-native plant species.
7. Identify that the restoration areas shall be irrigation-free for at least 3 years and the performance standards have remained stable (no negative trend for richness/ diversity/ abundance/ cover of native species and no positive trend for invasive/non-native cover for each vegetation layer) for at least 3 years.
8. Provide a monitoring plan to include methods and analysis of results. Also, include goals, success or failure criteria, and an adaptive management plan, contingency actions, and suggestions for failed restoration efforts.

Plan Requirements and Timing: Prior to issuance of ~~a grading permit~~ zoning clearance, the City of Carpinteria shall contract with a qualified biologist to develop a Plan. The Plan shall outline efforts to restore or enhance coastal sage scrub and coastal bluff scrub communities in areas impacted by construction of the project.

Monitoring: The City of Carpinteria and County staff shall ensure development of the Plan and adherence to Plan measures are completed prior to commencement of any earth-moving activities. Additionally, California Department of Fish and Wildlife shall approve the Plan prior to issuance of zoning clearance ~~ground disturbance~~. City and County staff shall periodically conduct site inspections to ensure compliance on site. Restored areas shall be monitored for five years following planting. Annual reports and the final report shall be submitted to the City and County.

MM-BIO-6 Weed Management Plan. Prior to issuance of zoning clearance ~~approval of a coastal development permit~~, the City shall contract with a qualified biologist to develop a Weed Management Plan to be implemented during construction and implementation of the Habitat Mitigation and Monitoring Plan. The Weed Management Plan shall include, but is not limited to, the following:

- Prior to ground disturbance, a City approved qualified biologist shall map invasive weeds within the limits of impacts plus a 100-foot buffer. Invasive weeds shall be defined as California Invasive Plant Inventory Database (Cal-IPC) moderate and high ratings. Invasive species subject to control measures shall be identified. Note that non-native grasses such as bromes and wild oats shall be mapped but are not subject to control measures. Prior to ground disturbance, areas with invasive weeds shall be treated according to control methods below and BMPs for invasive weeds.

- To prevent the spread of invasive weeds and inhibit germination, the following shall be implemented.
 - Maintain vehicle wash and conduct inspections to monitor the types of materials brought on site to minimize the potential for invasive weed introduction
 - Limit disturbance areas to the permitted disturbance area
 - Limit ingress and egress to defined routes
 - Use certified weed-free products
- Invasive weed control methods shall include legally permitted herbicide, manual, and mechanical methods approved for application. The application of herbicides shall be in compliance with state and federal laws and regulations under the prescription of a pest control advisor, with the City's concurrence, and shall be implemented by a licensed qualified applicator. All product labels shall be followed. Spot treatments shall be the method of application and broadcast applications shall be avoided. Herbicides shall not be applied during or within 72 hours of a forecasted measurable rain event or during high wind conditions. Invasive weed debris accumulated during manual and mechanical methods shall be disposed of at an appropriate location off-site. Maintenance shall be timed to remove invasive weeds prior to seed production. The maintenance crew shall coordinate with the City approved biologist to avoid and minimize impacts to plant species and wildlife species.
- A City approved qualified biologist shall perform annual monitoring within the limits of disturbance and a 100-foot buffer to map and document invasive weed species. At any time during implementation of the Weed Management Plan, monitoring frequency may increase as needed to provide guidance to maintenance crews.

Plan Requirements and Timing: Prior to issuance of zoning clearance ~~a grading permit~~, the City of Carpinteria shall contract with a qualified biologist to develop a Plan. The Plan shall outline efforts to implement a weed management plan to control invasive weeds. Pre-construction survey results shall be reported and ongoing invasive weed control efforts and annual survey results shall be submitted annually and for the five year duration of the Habitat Mitigation and Monitoring Plan.

Monitoring: The City of Carpinteria and County staff shall ensure development of the Plan and adherence to Plan measures are completed prior to commencement of any earth-moving activities. City and County staff shall periodically conduct site inspections to ensure compliance on site and to ensure the plan is fully implemented.

MM-BIO-7 **Pre-construction Nesting Bird Surveys.** Within 30 days prior to any vegetation clearing, ground disturbance, or use of noise-generating equipment associated with construction or grading that would occur during the nesting/breeding season of native bird species potentially nesting on the site (typically mid-February through August in the project region, or as determined by a qualified biologist), the City shall have weekly surveys conducted by a qualified biologist to determine if active nests of special-status bird species, or of any bird species protected by the Migratory Bird Treaty Act or the

California Fish and Game Code, are present in the disturbance zone or within 300 feet (500 feet for raptors) of the area to be disturbed. The surveys shall occur on a weekly basis, with the last survey being conducted no more than seven days prior to initiation of disturbance work. If ground disturbance is delayed, then additional pre-disturbance surveys shall be conducted such that no more than seven days will have elapsed between the survey and ground disturbance activities. The City or contractor shall provide the biologist with plans detailing the extent of proposed ground disturbance prior to the survey effort.

If active nests are found, including any nests for Cooper's hawk, clearing and use of noise-generating construction equipment within 300 feet of the nest (500 feet for raptors) shall be postponed or halted, at the discretion of the biologist, until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with highly visible construction fencing, and construction personnel shall be instructed on the sensitivity of nest areas. The results of the surveys, including graphics showing the locations of any nests detected, and any avoidance measures recommended, shall be submitted to the City and County within 14 days of completion of the pre-construction surveys to document compliance with applicable state and federal laws pertaining to the protection of native birds.

Plan Requirements and Timing: Pre-construction nesting bird surveys shall be completed within 30 days prior to any vegetation clearing or ground disturbance associated with construction or grading during the bird nesting season (typically mid-February to August). The surveys shall occur on a weekly basis, with the last survey being conducted no more than seven days prior to initiation of disturbance work.

Monitoring: The City of Carpinteria and County staff shall ensure the pre-construction nesting bird surveys and any avoidance requirements are completed prior to commencement of any earth-moving activities.

3.3.6 Level of Significance After Mitigation

Implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3** would reduce impacts to California legless lizard to less than significant. Implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-4** would reduce impacts to San Diego desert woodrat to less than significant. After implementation of **MM-BIO-1**, **MM-BIO-2**, **MM-BIO-5**, and **MM-BIO-6** impacts to sensitive vegetation communities, including County ESH and City ESHA, would be less than significant. After implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-7**, impacts to nesting birds during the bird nesting season would be less than significant.

Section 3.5, Geology & Soils

3.5.4 Impact Analysis

- a) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?*
 - ii. *Strong seismic ground shaking?*
 - iii. *Seismic-related ground failure, including liquefaction?*
 - iv. *Landslides?*

The California Department of Conservation provides an index map that identifies all Official Maps of Earthquake Fault Zones delineated by the California Geological Survey through December 2010 under the Alquist-Priolo Earthquake Fault Zoning Act. According to the most recent data, the proposed project is not located within an Alquist-Priolo earthquake fault zone; however, the project site is to the north of the Pitas Point quadrangle (CGS 2018c). The northwestern corner of the Pitas Point quadrangle encompasses a very small portion of Santa Barbara County, consisting of the Rincon Point neighborhood south of Rincon Point Lane. The fault line within the Pitas Point Quadrangle that is closest to the proposed project runs northwest-southeast, north of La Conchita Beach in Ventura County, approximately two miles southeast from Rincon Beach County Park (Dibblee and Ehrenspeck 1986).

According to the City of Carpinteria's General Plan Fault Map, the Rincon Creek fault is located to the north of the proposed project and the Carpinteria Fault is located to the south (City of Carpinteria 2003). In the immediate vicinity of the proposed trail and parking lot, the project is located on the up-thrown side on an inferred fault located to the north of US Highway 101 near the connection to Highway 150 (City of Carpinteria 2003). According to the Santa Barbara County's South Coast Seismic Tectonic Map, the entire south coast portion of the county, including the project site, is rated as having a high seismic potential with a moderate possible variation from the assigned rating (County of Santa Barbara 2011). The Santa Barbara County South Coast Seismic Tectonic Map indicates that the Red Mountain fault is the closest known potentially active fault and traverses the proposed trail near the intersection of the UPRR and the trail alignment. The Red Mountain fault is approximately 39 km (24 miles) long and trends in a generally east-west direction, running parallel to the coastline, near the project area. A maximum credible earthquake of moment magnitude 6.8 has been assigned to this reverse displacement fault (CGS 1996).

The proposed project consists of a shared-use path with pedestrian bridge and other trail improvements. The project would not introduce new buildings that would be subject to structural damage in the unlikely event of strong seismic ground shaking. Moreover, there are no existing buildings within the project area that would pose a risk of loss, injury, or death as a result of potential structural damage caused by earth movement. However, the pedestrian bridge structure could be damaged by seismic activity if not designed to withstand the potential peak ground acceleration of 0.8 g, as identified in the Bengal geotechnical report (Appendix E).

Previously manipulated and engineered slopes along the trail alignment are proposed to be re-graded to achieve a finished slope face that is more gradual (less steep) than the existing slope faces. Slopes adjacent to US Highway 101 would be reshaped with those above the trail having a slope ratio of 1.25:1, fill slopes (which would be present only adjacent to the bridge over the UPRR) are proposed to have slope ratios between 2:1

and 4:1. For the portion of the path on the ocean side of the UPRR alignment, the regraded slopes for the trail “bench” would employ cut slopes with a ratio of 1:1 above the trail, while a ratio of 1.25:1 would be employed for the “reinforced” fill slopes below the trail. These slope angles are each shallower than existing conditions, ~~and mid-elevation benches in the slopes and~~ would further decrease the potential for mass soil movement (shallow landslides). It is important to note that all of the earthwork proposed for the project involves manipulation of manufactured slopes (previously modified landforms) and not natural topography. In addition, the project proposes to vegetate all new slope areas to minimize the potential for shallow erosion to occur.

The Carpinteria Valley is subject to geologic hazards related primarily to earthquakes and secondary hazards, such as landslides and liquefaction; the project includes manufactured slopes and a bridge structure that could be damaged by seismic ground shaking. As such, potential impacts relating to adverse effects caused by strong seismic ground shaking, or seismic related ground failure would be potentially significant. **Mitigation Measure (MM) GEO-1** through **MM-GEO-3** would reduce impacts to **less than significant with mitigation**.

b) *Would the project result in substantial soil erosion or the loss of topsoil?*

Soils within the project site have been classified as Xerorthents, cut and fill areas (USDA 2020). The NRCS Web Soil Survey provides an erosion hazard rating that indicates the hazard of soil loss from off-road and off-trail areas after disturbance activities that expose the soil surface. Xerorthents in the project area have a moderate erosion hazard rating, which indicates that some erosion is likely and that erosion control measures may be needed (USDA 2020). The project does propose to vegetate all new slope area to minimize the potential for soil erosion to occur.

To prepare the site for trail construction, the trail alignment along with adjacent slopes would be graded to meet the proposed finished grade surface and to achieve stable slope profiles above and below the trail. It is anticipated that total cut would be approximately ~~107,386~~ 96,040 cubic yards and total fill would be approximately ~~14,860~~ 10,519 cubic yards during the grading phase. Cut material on site would be utilized for the necessary fill material, as feasible. The re-grading of previously manufactured slopes is intended to reduce the angle of the slope face, decreasing historic erosion rates and increasing the long-term stability of the slope faces. The lower angle slopes would not be noticeably different from the existing manufactured slopes but should eliminate or greatly reduce the amount of soil materials moving down the slope areas to be deposited on the trail or areas below the trail. Erosion potential would be lessened with the proposed engineered slope design. However, soil erosion could be increased unless proper slope construction techniques are employed. Accordingly, soil erosion impacts would be potentially significant. **MM-GEO-3** would reduce impacts to **less than significant with mitigation**.

Section 3.8 Hydrology & Water Quality

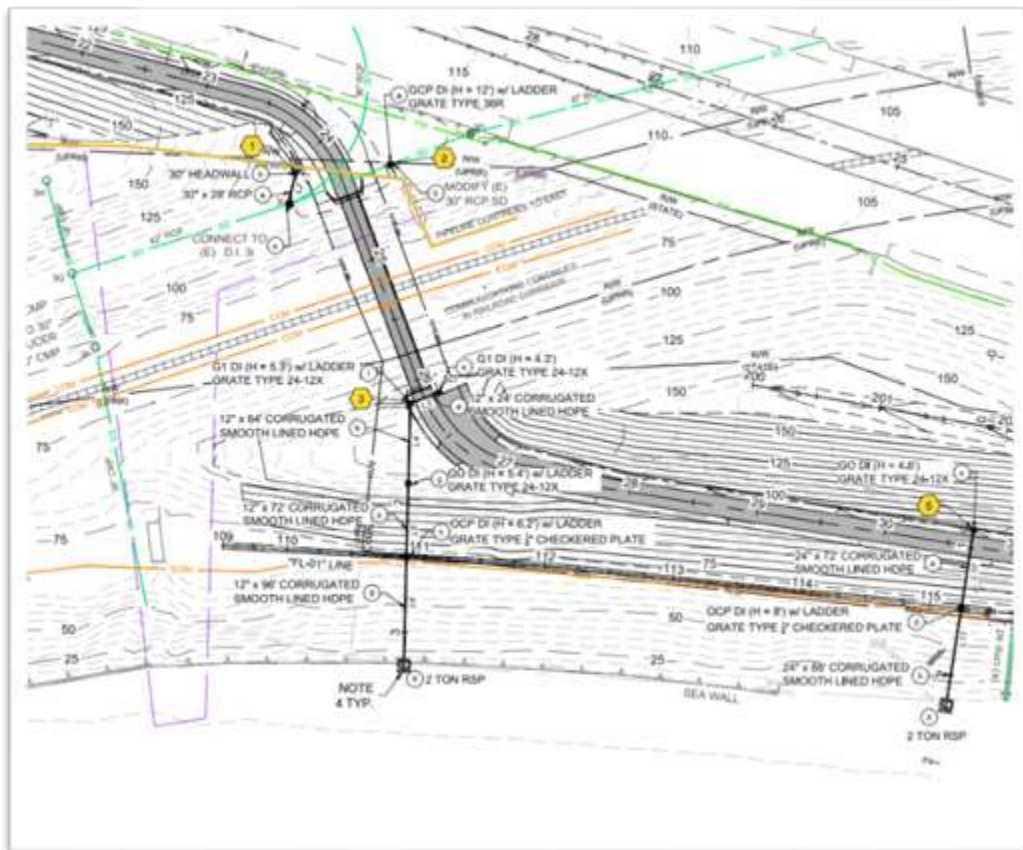
3.8.4 Impact Analysis

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***
- i. *result in substantial erosion or siltation on or off-site?***
 - ii. *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site?***
 - iii. *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?***

iv. impede or redirect flood flows?

The project would moderately alter the existing drainage patterns of the site, via regrading of project slopes and short-term removal of vegetation, as well as through introduction of the impervious trail surface (approximately 1 acre of new impervious surface). Increased stormwater runoff and erosion potential during construction and until new vegetation is established are addressed under **MM-WAT-1**, **MM-WAT-2**, and **MM-WAT-3**. Long-term stormwater runoff from the trail surface would be collected by a concrete v-ditch adjacent to the trail, and released through a series of short length storm drains with discharge along the adjacent beach. The provision of project-specific storm drains would accommodate the storm runoff volumes anticipated from the project's impervious surfaces, and also avoid directing stormwater to existing public storm drain systems in the project vicinity that could lack surplus capacity to accommodate the project. Release of project storm drainage along the beach would not result in substantial erosion, as the introduction of impervious surface would be minimal compared to the overall project drainage area and the trail drainage will be divided into 6 5 separate outlets to minimize the discharge volume from any of the outlets. Illustration 3.8-1 2.6 (Project Description) illustrates these 6 5 outlets., ~~three exist (blue color) and three would be new (magenta).~~ The Project would remove two heavily degraded storm drains and outlets and construct four new storm drain lines for the segment of trail south of the UPRR alignment.

Illustrations 3.8-2 and 3.8-3 provide plan sheet excerpts of the proposed drainage system outlets, with connection to other drainage conveyance elements.



SOURCE: Bengal Engineering

Illustration 3.8-2

Design Details for Storm Drain Outlets #3 and #5



SOURCE: Bengal Engineering

Illustration 3.8-3 Design Details for Storm Drain Outlets #6 and #7

The proposed storm drain system includes concrete v-ditch for collection and conveyance of runoff water, drop inlets connecting to vertical drainpipes, and outlets at the beach elevation. The concrete v-ditch components would be durable, and not prone to weathering or failure over time. The vertical drains are proposed to be composed of a 12-inch diameter corrugated metal pipe. The pipe would be buried to cross beneath the trail section and would descend partly down the bluff face. However, in order to allow visual access for inspection of the pipe integrity, the lower portion of the storm drainpipe would be mounted on the surface of the slope/bluff face. The corrugated metal material was selected for weight consideration and as a superior material to PVC for withstanding damage from fire or sun exposure. However, the metal is prone to rust or corrosion, with the potential for collapse or failure over time. Leaks from the vertical drains would contribute to erosion of the bluff face, failure of a vertical storm drain could lead to significant erosion of the bluff face. The storm drains would be installed by the project, **MM-WAT-5** requires periodic inspection and maintenance of the storm drains in perpetuity to prevent failure of such facilities. Accordingly, the project's impacts on existing drainage patterns and storm drain systems would be potentially significant. Incorporation of **MM-WAT-5** would reduce impacts to **less than significant with mitigation**.

Section 3.9, Land Use and Planning

In response to comments received on May 3, 2021 by the County of Santa Barbara Planning and Development, the following changes have been made to Section 3.9.2, Relevant Plans, Policies, and Ordinances, included in the Draft EIR.

Santa Barbara County Comprehensive Plan

As indicated above, California State Government Code Section 65300 requires all cities and counties adopt a comprehensive, long-term general plan that outlines physical development of the county or city. The County of Santa Barbara refers to theirs as a Comprehensive Plan, to avoid confusion with the City of Santa Barbara General Plan. The comprehensive plan must cover a local jurisdiction's entire planning area so that it can adequately address the broad range of issues associated with the city or county's development. Ultimately, the comprehensive plan expresses the community's development goals and embodies public policy relative to the distribution of future public and private land uses. The Santa Barbara County Comprehensive Plan contains the following Elements: Agriculture, Circulation, Coastal Land use Plan, Conservation, Energy, Environmental Resources Management, Hazardous Waste, Housing, Land Use, Noise, Open Space, Scenic Highways, Seismic Safety & Safety. The Coastal Land Use Plan is described in further detail below, including applicable objectives and policies. The remaining elements of the County Comprehensive Plan are described within the EIR sections to which they pertain. The Santa Barbara County Comprehensive Plan Open Space Element includes the following applicable policies.

Coastal Land Use Plan Policy 7-33: To encourage walking and biking as alternatives to travel by automobile, the County shall strongly encourage development of new pedestrian and/or bicycle-friendly paths along the highway corridor. Improvements to Highway 101 shall not remove existing bikeways or pedestrian paths or preclude the development of proposed bikeways or pedestrian paths that are identified in the County's Comprehensive Plan, Coastal Land Use Plan and community plans, without providing comparable or better replacement facilities.

Coastal Act Policy 30211. Development shall not interfere with the public's right of access to the sea where acquired through use, custom, or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Coastal Act Policy 30252. The location and amount of new development should maintain and enhance public access to the coast by: (1) facilitating the provision or extension of transit service; (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads; (3) providing non-automobile circulation within the development; (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation; (5) assuring the potential for public transit for high-intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of on-site recreational facilities to serve the new development.

Coastal Act Policy 30210. In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall

be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners and natural resource areas from overuse.

Coastal Act Policy 30212.5 Wherever appropriate and feasible, public-facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.

Coastal Act Policy 30213. Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Coastal Land Use Plan Policy 7-8: Increased opportunities for beach access shall be provided in the Carpinteria planning area.

Coastal Land Use Plan Policy 3-13: Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.

Coastal Land Use Plan Policy 3-14: All development shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited for development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

Coastal Act Policy 30240 (b). Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

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

Circulation Element Policy 5C: The County shall continue to develop programs that encourage the use of alternative modes of transportation including, but not limited to, an updated bicycle route plan, park and ride facilities, and transportation demand management ordinances.

3.9.4 Impact Analysis

- a) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

The project site within the City of Carpinteria has a Carpinteria General Plan/Coastal Land Use Plan land use designation of Visitor-Serving Commercial (2003) and has been zoned for Resort Zone District use. The portion of the project within the County of Santa Barbara is designated as Other Open Land and Recreation and is zoned Transportation Corridor and Recreation (County of Santa Barbara 2010). The proposed trail is an apt use for the

City's and County's vision for the properties within each jurisdiction. The provision of the proposed multi-use trail within the coastal zone would also meet the objectives in Coastal Act Policies to expand low cost recreation opportunities, enhance access to coastal and beach resources, and to support alternative modes of transportation. The proposed multi-use trail would assist in achieving similar objectives in Carpinteria and Santa Barbara County coastal land use policies that strongly encourage development of a trail parallel to the US Highway 101 corridor, provision of alternative transportation facilities, and enhancement of public access to the beach While the proposed trail in some areas would traverse areas designated as environmentally sensitive habitat area (ESHA), the avoidance of which is generally prioritized in local coastal plan and Coastal Act policies. mitigation measures require the restoration of areas outside the trail to fully offset the removal of native plants to accommodate trail construction (refer to Section 3.3, Biological Resources). The proposed trail would involve substantial earthwork, which is generally discouraged by local coastal land use policies; however the earthwork is focused on the remediation of artificially steep slope areas which are remnants of previous transportation facilities within the Project corridor, and does not involve modification of natural landforms. Mitigation measures require that new slopes follow specifications in the Project geotechnical study to achieve replacement slopes that are stable. With the incorporation of mitigation measures identified in this document to reduce environmental impacts to less than significant levels, the proposed project would not conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project. In addition, no habitat conservation plans or natural community conservation plans apply to the project site. Overall, the proposed project would achieve the goal of enhanced coastal access. In addition, with respect to consideration of parking related to coastal access, construction is not anticipated to reduce parking availability. No parking spaces would be removed by the proposed project. However, absent mitigation, impacts due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be potentially significant. **Mitigation Measures (MM) AES-1; MM-BIO-1 through MM-BIO-6; MM-CR-1 through MM-CR-4; MM-GEO-1 through MM-GEO-3; MM-HAZ-1; MM-WAT-1 through MM-WAT-6; MM-NOI-1 through MM-NOI-2; MM-TCR-1** would reduce impacts to conflicts with any land use plan, policy, or regulations to **less than significant with mitigation.**

b) Would the project result in cumulatively considerable impacts to land use and planning?

The proposed project would be consistent with the land use and zoning designations that have been assigned to the project site parcels. It would also implement a number of policies aimed at increasing public access to the beach as well as providing transportation alternatives for non-vehicle travel. While portions of the proposed trail would traverse designated ESHA, **MM-BIO-1 through MM-BIO-4** would be required to fully offset the project's reduction in habitat area (refer to Section 3.3). The proposed trail would involve substantial earthwork; however, the earthwork is focused on the remediation of artificially steep slope areas which are remnants of previous transportation facilities within the Project corridor. **MM-GEO-1 through MM-GEO-3** would ensure that all trail elements and replacement slopes are stable. In addition, impacts due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be potentially significant. Therefore, **Mitigation Measures (MM) AES-1; MM-BIO-1 through MM-BIO-6; MM-CR-1 through MM-CR-4; MM-GEO-1 through MM-GEO-3; MM-HAZ-1; MM-WAT-1 through MM-WAT-6; MM-NOI-1 through MM-NOI-2; MM-TCR-1** would reduce impacts to conflicts with any land use plan, policy, or regulations to less than significant with mitigation. Therefore, with implementation of all mitigation included in the EIR, the proposed project would not have a considerable contribution to any cumulative land use or planning impact.

Section 3.11, Recreation

3.11.4 Impact Analysis

- a) ***Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

The proposed project includes a shared-use path for walking and biking. The proposed trail would fill in an existing segment of the California Coastal Trail between the Carpinteria Bluffs Nature Preserve, which includes several miles of interconnected coastal bluff open space trails, and Rincon Beach County Park with 1 mile of the trail along the bluff. As the Rincon segment will expand the Carpinteria Coastal Trail System and would connect the City of Carpinteria with Rincon Beach County Park and points east and west along the Pacific Coast Bikeway and California Coastal Trail, it would provide additional recreation and access opportunities along the Santa Barbara County and Ventura County coastline. The proposed trail also would serve to fill in missing segments in the California Missions Trail and the Juan Bautista de Anza National Historic Trail. The project would provide a safe, direct and scenic coastal pedestrian and bike trail link to Ventura County paralleling U.S. Highway 101 and would formalize one railroad overcrossing along this segment, providing for safe access to the coast.

Although the air space above the proposed trail is not a public recreational facility for the purposes of the CEQA Guidelines, the proposed trail also is not expected to significantly impair the ability of paragliders and hang-gliders. Members of the paragliding and hang-gliding community have expressed concern that the proposed regrading of slopes along the trail alignment could adversely impact wind uplift conditions, such that paragliding and hang-gliding opportunities in the air space above the property could be eliminated, or substantially reduced.

The portion of the bluff face that would be regraded for the proposed trail was previously altered to create a bench for the UPRR alignment, and this steep manufactured slope is not considered to be stable in the long term with or without the project (the railroad was previously re-aligned away from this slope). Reducing the steepness of the slope face (making it less vertical) is necessary to avoid it collapsing over time and ensuring the longevity of the proposed new trail. Comments from the soaring community indicate a belief the proposed lessening of the bluff face slope angle could reduce or eliminate wind uplift patterns along the re-graded bluff slope area.

In order to evaluate the change in wind uplift patterns above the bluff face from the proposed regrading for the project, Dudek commissioned an Airflow Analysis for the Proposed Regrading of the Rincon Bluffs study (Airflow Study) by an expert in fluid dynamics; the Airflow Study is included as Appendix I of this Environmental Impact Report. Several different approaches were used, based upon published literature including wind tunnel experiments and direct field measurements of the amplification effects of a slope or vertical face on horizontal wind vectors perpendicular to the slope face. In the published literature reviewed for this Airflow Study, certain investigators compared the average slope angle of the entire slope or bluff face to determine the wind amplification effect, while others compared the angle of just the upper portion of the slope. The analysis of the effects of the originally proposed regrading of the bluff face for the project (which previously included a mid-elevation bench above the trail) concluded that the proposed regrading could reduce the vertical airflow velocity by 10% to 30% relative to current conditions; for altitudes relevant to soaring activities, the reduction is expected to be closer to 30% (Appendix I). Given the updated project design that no longer incorporates a mid-elevation bench above the trail, the Air Flow Study (Appendix I) found that the elimination of the upper bench would result

in a reduction in the vertical wind speed along the bluff edge by 10% to 20%, rather than the 30% maximum reduction resulting from the originally proposed project. In practical terms, a reduction in vertical wind speeds along the bluffs caused by regrading could maintain conditions favorable for paragliding and hang-gliding activities to occur in the air space over the trail alignment. A vertical wind speed reduction of 10% to 20% would have a lower effect upon soaring opportunities than the 30% reduction associated with the originally proposed project. As such, the updated project design could result in conditions that allow for soaring more frequently than the originally proposed project. Based on available experimental results, the introduction of an upper bench above the trail is expected to provide a small increase in turbulence (on the order of 5%) at an altitude of 30 feet above the front of the bluffs, becoming negligible by an altitude of approximately 75 feet (Appendix I).

Published records of wind speeds favorable to paragliding and hang-gliding above the bluffs along the trail alignment do not exist. However, the Torrey Pines Gliderport is a dedicated soaring facility adjacent to the ocean bluffs in San Diego County, that exhibit similar characteristics to the bluffs along the Rincon Trail alignment. At Torrey Pines, about 7-15 mph of wind coming from the west (perpendicular to the bluffs) is generally needed for paragliding tandems; hang gliding tandems generally need 10-18 mph, also from the west (Torrey Pines Gliderport 2021). This evidences a wind regime that is successful in supporting soaring operations with an approximately 50% range of wind speeds (lowest viable wind speed representing 50% of the top speed). Consequently, the maximum predicted reduction in vertical wind velocity (~~30%~~ 20%) caused by the proposed regrading of bluffs along the trail segment south of the UPRR alignment should not eliminate favorable wind uplift patterns above the bluff face for soaring activities. The existing ~~20%~~ 30% of the upper portion of wind speeds successful for soaring should continue to provide acceptable uplift conditions; thus the proposed trail alignment would not cause paragliders and hang-gliders to use other air space, such that substantial physical deterioration of those facilities would occur or be accelerated. The upper end of the wind speed regime considered acceptable for soaring activities also may be extended somewhat by reduced updraft velocities, which may create additional opportunities for soaring activities during conditions with high wind velocities. In addition, the bluff west of where the proposed trail would cross the UPRR alignment would not be altered in any way by the proposed trail. Therefore, while the proposed regrading of the ocean bluffs will cause some modification of vertical wind velocities supporting soaring activities, it is unknown what the net effect will be on the number of days annually in which the wind conditions within the project alignment are favorable for soaring. Given the uncertainty above and the Airflow Study analysis that the maximum predicted reduction in vertical wind velocity will be ~~30%~~ 20% given the absence of a mid-elevation bench above the trail, the proposed project would have a **less than significant impact on recreational resources.**

Section 6.0, Alternatives

6.6.2 Maximize Existing Benchwork/Topography Alternative (Alternative 2)

Project Alternative 2 Impact Analysis

Biological Resources

The Maximum Existing Benchwork/Topography Alternative, would overall disturb ~~less~~ more area than the proposed project. The project impacts a total of 5.05 acres and this alternative impacts a total of 6.30 acres, resulting in an increase of 1.25 acres. ~~Project temporary impacts total 4.02 acres and this alternative has no temporary impacts identified, resulting in a net decrease of 4.02 acres of temporary impacts. It should be noted that although temporary impacts have not been identified, this alternative will likely result in temporary impacts. Project~~

permanent impacts total 1.02 acres and this alternative includes 0.67 acres of permanent impacts resulting in a net decrease of 0.35 acres of permanent impacts. Overall, the net impacts will decrease by 4.37 acres under this alternative since less grading and earthwork is required. More specifically, the project would result in 4.32 acres of impacts to County ESH and City ESHA and this alternative would result in 5.48 acres of impacts to County ESH and City ESHA, resulting in an increase of 1.16 acres of impacts to County ESH and City ESHA. More specifically, the project would result in 3.55 acres of temporary impacts to County ESH and City ESHA and this alternative has no temporary impacts identified, resulting in a net decrease of 3.55 acres of temporary impacts to County ESH and City ESHA. The project will result in 0.76 acres of permanent impacts to County ESH and City ESHA and this alternative includes 0.51 acres of permanent impacts to County ESH and City ESHA, resulting in a net decrease of 0.25 acres of permanent impacts to County ESH and City ESHA. Overall, the net impacts to County ESH and City ESHA would decrease by 3.80 acres under this alternative since less grading and earthwork is required.

Because the vast majority of impacts under the proposed project are occurring within sensitive native vegetation communities identified as County ESH and City ESHA and require mitigation, this alternative would result in fewer more overall impacts. However, mitigation measures associated with County ESH and City ESHAs would still be required. While less more area is proposed to be impacted under this alternative, similar impacts to special-status wildlife species and nesting birds may occur and would require similar mitigation. Therefore, due to the decreased increased overall direct impacts to sensitive native vegetation communities identified as County ESH and City ESHA, impacts to biological resources would be reduced increased under the Maximum Existing Benchwork/Topography Alternative, Alternative 2 and MM-BIO-1 through MM-BIO-6 would continue to be required.

6.6.3 Steeper Slopes/Reduced Earthwork Alternative (Alternative 3)

Project Alternative 3 Summary

Under the proposed project, to achieve compliance with pathway surface slope limitations under the Americans with Disability Act (ADA), the existing benched slope would be regraded along the entire trail alignment. On some portions of the trail (along the segments north of the UPRR alignment), the proposed project also includes creation reconstruction of an existing second earthwork bench on the new slope above the trail to reduce erosion potential. Several agencies provided comments indicating that earthwork should be reduced as much as possible in order for the Project to achieve compliance with applicable resource protection policies and to minimize environmental impacts. In response, a refined The Steeper Slopes/Reduced Earthwork Alternative (Alternative 3) has been developed that would: 1) reduce the paved width of the trail from 16 feet to 14 feet for the segment south of the UPRR crossing; 2) re-align the trail slightly in the segment south of the UPRR crossing to re-use a longer portion of the existing historic bench; and, 3) remove one of the earthwork benches that was originally proposed on the slope above the trail alignment, for a portion of the trail length segment south of the UPRR crossing.

Figure 6-2 (Concept Design 6% Grade) illustrates the alignment of the trail for the segment south of the UPRR crossing under the refined Steeper Slopes/Reduced Earthwork Alternative (Alternative 3). In order to capitalize on the existing historic bench, the trail would need to descend slightly more steeply from the UPRR over-crossing bridge, resulting in a trail segment of approximately 690 feet in length with trail surface slope of 6% as compared to the proposed project that employs a 5% grade along this trail segment. It should be noted that 5% is the maximum trail surface slope for a path/trail to be ADA compliant, and consequently the easterly 690 foot portion of the trail southward of the UPRR crossing would not evidently achieve ADA compliance under the refined Alternative 3. The U.S. Access Board (USAB) is responsible for developing accessibility guidelines for the construction and alteration of facilities covered by the Americans with Disabilities Act (ADA) of 1990 and the Architectural Barriers Act (ABA) of

1968. The guidelines ensure that the facilities are readily accessible to and usable by people with disabilities. The Access Board issued the current guidelines in 2004. According to the USAB guidelines, segments of the trail may qualify for an exception to the maximum surface slope, where compliance is not practicable due to terrain. Not practicable may be defined as requiring extensive cuts or fills that are difficult to construct and maintain, cause drainage or erosion impacts, or create other adverse environmental impacts (<https://www.access-board.gov/aba/guides/chapter-10-outdoor/#conditions-for-exceptions-1019>). If this exception were to be granted for the 690 foot segment with 6% ground slope, the entire trail could potentially be considered ADA compliant.

The cross sections proposed under Alternative 3 are shown in Illustration 6-1, Steeper Slopes/Reduced Earthwork Alternative (Alternative 3) Trail Cross Section, below. Alternative 3 would result in a 7.6% reduction of earthwork, or 10,015 less CY, compared to the project. Regarding the export of earth materials from the site, refined Alternative 3 would reduce exported materials volume by approximately 121 CY (from 85,521 CY to 85,400 CY) compared to the proposed project. Under refined Alternative 3, the proposed alignment would be the same as the proposed project for the segment north of the UPRR corridor. Similar to the proposed project, a bridge would be provided to provide safe crossing for trail users over the UPRR. However, the exact alignment and cross section of the trail south of the UPRR crossing, on the eastern portion of the trail alignment, would be different. More specifically, Alternative 3 would not provide benches above the trail (to control drainage and rockfall); the trail would intersect the existing historic railroad bench at a more westerly point; and, a segment of the trail approximately 690 feet in length would descend at a slightly steeper grade (6%).

Project Alternative 3 Impact Analysis

Air Quality

Alternative 3 would result in ~~96,077 CY of cut and 10,570 CY of fill, resulting in 85,507~~ 85,400 CY of export. This is lower than the proposed project's ~~92,526~~ 85,521 CY of export and therefore would result in fewer haul trucks during construction. Therefore, criteria air pollutant emissions during construction are expected to be less than the proposed project. Impacts would be less than significant during construction. During operation, Alternative 3 would result in emissions from maintenance activities similar to the proposed project. Maintenance activities include landscape watering, vegetation control and other trail amenity care and repair, which would involve the temporary use of a light-duty truck that would generate nominal air pollutant emissions. Operational impacts would be considered less than significant, and similar to that of the proposed project.

Biological Resources

Alternative 3 would disturb approximately the same area as the proposed project. While the volume of sediment removed and grading configuration proposed for this alternative would reduce overall earthwork, it would occur within the same overall grading and development footprint since the location of the trail alignment would be substantially the same as for the proposed project. Additionally, impacts to special-status wildlife species and nesting birds would be similar under this alternative since the impact footprint is approximately the same. The Steeper Slopes/Reduced Earthwork Alternative would result in similar impacts to biological resources as the proposed project and would require similar mitigation because development would generally occur within the same footprint as the proposed project. Therefore, the Steeper Slopes/Reduced Earthwork Alternative would result in similar impacts to biological resources and MM-BIO-1 through MM-BIO-7 would continue to be required to address potentially significant biological resources impacts under Alternative 3.

Cultural Resources

Alternative 3 would disturb approximately the same area as the proposed project. As discussed in Section 3.4, cultural resources are present between the UPRR crossing bridge and U.S. Highway 101. Development under Alternative ~~2~~ **3** would still result in development of the trail segment north of the UPRR crossing in the identical alignment to the proposed project, same area, and would therefore result in equivalent impacts to these existing cultural resources. In addition, the project could still potentially impact undiscovered cultural resources along the overall trail alignment, including archaeological resources and human remains. **MM-CR-1** through **MM-CR-4** would still be required. Impacts would be similar to the proposed project.

Energy

Alternative 3 would result in ~~96,077 CY of cut and 10,570 CY of fill, resulting in 85,507~~ 85,400 CY of export. This is lower than the proposed project's ~~92,526~~ 85,521 CY of export and therefore would result in fewer haul trucks during construction. Therefore, energy use during construction is expected to be less than the proposed project. During operation, Alternative 3 would result in energy use from maintenance activities similar to the proposed project. Maintenance activities include landscape watering, vegetation control and other trail amenity care and repair, which would involve the temporary use of a light-duty truck that would generate nominal energy usage. Operational impacts would be considered less than significant, and similar to the proposed project.

Geology and Soils

Alternative 3 would result in ~~110,019~~ 40 less CY of earthwork excavation, compared to the project, and 121 CY less exported earth materials. Under Alternative 3, the proposed alignment would be substantially the same as the proposed project. However, for the cross section of the trail south of the UPRR crossing, on the eastern portion of the trail alignment, Alternative 3 would re-align the trail slightly to re-use a longer portion of the existing historic bench and would employ a trail surface slope of 6% for the easterly 690 feet of the trail not provide benches above the trail. Given the slightly lower volume of earthwork involved, temporary erosion impacts during construction would be slightly reduced with this alternative; however, **MM-GEO-3** would continue to be required. The same bridge structure over the UPRR alignment would be employed, and therefore **MM-GEO-1** and **MM-GEO-2** would continue to be required. Updated geotechnical design details would be needed to address long-term stability of the regraded slopes south of the UPRR alignment, but the project engineers have indicated that feasible methods to achieve such stability are available and could be detailed in an updated geotechnical report if Alternative 3 were to be selected for implementation. It should be noted that **MM-GEO-3** mandates preparation of an updated geotechnical investigation to address final trail design, and incorporation of all identified recommendations from the updated geotechnical investigation during implementation of the final selected trail design. Therefore, impacts would be similar to the proposed project.

Greenhouse Gas Emissions

Alternative 3 would result in ~~96,077 CY of cut and 10,570 CY of fill, resulting in 85,507~~ 85,400 CY of export. This is lower than the proposed project's ~~92,526~~ 85,521 CY of export and therefore would result in fewer haul trucks during construction. Therefore, GHG emissions during construction are expected to be less than the proposed project. Impacts would be less than significant during construction. During operation, Alternative 3 would result in GHG emissions from maintenance activities similar to the proposed project. Maintenance activities include landscape watering, vegetation control and other trail amenity care and repair, which would involve the temporary

use of a light-duty truck that would generate nominal air pollutant emissions. Operational impacts would be considered less than significant, and similar to the proposed project.

Hazards and Hazardous Emissions

Alternative 3 would involve an identical trail length to the project, but would reduce ~~earthwork~~ the volume of exported earth materials by approximately ~~10,019~~ 121 CY. The use of heavy equipment would be slightly reduced in duration, compared to the project, due to the reduced ~~earthwork~~ volume of exported earth materials. The section of the trail north of the UPRR corridor (the western portion) would have the same potential to encounter soils with ADL. Overall, impacts would remain similar or the same as the project relative to the volumes of hazardous materials associated with construction and the risk of release, as well as handling and disposal of ADL containing soils. **MM-WAT-2** and **MM-HAZ-1** would continue to be required, and residual impacts under Alternative 3 would also be less than significant.

Hydrology and Water Quality

Alternative 3 would involve an identical trail length to the project and would have substantially similar total earthwork volumes as the project ~~but would reduce earthwork by approximately 10,019~~. With slightly reduced ~~earthwork~~ volume of excavated and exported earth materials, the potential for erosion during construction would be reduced under Alternative 3, as compared to the proposed project; however, **MM-WAT-1**, **MM-WAT-2**, and **MM-WAT-3** would continue to be required to address potential erosion and other water quality impacts during construction. The trail alignment under Alternative 3 would substantially match the project, and therefore all of the proposed storm drain components would continue to adequately serve the stormwater runoff volumes from the project. As with the proposed project, **MM-WAT-4**, **MM-WAT-5**, and **MM-WAT-6** would continue to be required to address long-term operational effects upon water quality. Overall, Alternative 3 would marginally reduce hydrology and water quality impacts when compared to the project.

Land Use and Planning

The proposed project would result in less than significant impacts to land use and planning with incorporation of **MM-BIO-1** through **MM-BIO-4**, which prescribe required mitigation measures to satisfy requirements found in City and County policies governing ESHA. As discussed under Biological Resources, above, Alternative 3 would disturb approximately the same area as the proposed project, resulting in similar impacts to ESHA. In addition, the project would result in less than significant impacts to conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect with implementation of **MM-AES-1**; **MM-BIO-1** through **MM-BIO-7**; **MM-CR-1** through **MM-CR-4**; **MM-GEO-1** through **MM-GEO-3**; **MM-HAZ-1**; **MM-WAT-1** through **MM-WAT-6**; **MM-NOI-1** through **MM-NOI-2**; **MM-TCR-1**. It is anticipated that Alternative ~~2~~ 3 would require similar mitigation measures to reduce potential land use impacts. Thus, impacts to land use and planning would be similar under this alternative.

Noise

Alternative 3 would involve an identical trail length and substantially similar alignment to the project but would reduce the volume of exported earth material by approximately 121 CY, compared to the proposed project earthwork by approximately 10,019 CY. With reduced earthwork volume, the duration for earthwork activities using heavy equipment would be lessened, and lessening the number of off-site haul truck trips; nonetheless **MM-NOI-1** and **MM-NOI-2** would continue to be required to reduce construction noise impacts to a less than significant level. Noise impacts from Alternative 3 would be similar to the project, but somewhat less due to the reduced earthwork volumes involved, as compared to the project.

Recreation

Under Alternative 3, a multi-use trail for cyclists and pedestrians ~~identical~~ that is substantially similar to the proposed project would be constructed and operated, and the substantial gap that currently exists in the Coastal Trail system would be filled. Enhancement of local and regional biking and hiking opportunities delivered by the project would also be achieved under Alternative 3, and recreational benefits of the project would be realized. A critical difference would be incorporated, however, in the grading profile for the trail segment along the bluff face adjacent to the ocean; this segment would not be re-graded to create a second bench above the trail bench (unlike the proposed project). The Air Flow Study (Appendix I) found that the elimination of the upper bench would result in a reduction in the vertical wind speed along the bluff edge by 10% to 20%, rather than the 30% maximum reduction resulting from the proposed project. In practical terms, a reduction in vertical wind speeds along the bluffs caused by regrading could maintain conditions favorable for paragliding and hang gliding activities to occur in the air space over the trail alignment. A vertical wind speed reduction of 10% to 20% would have a lower effect upon soaring opportunities than the 30% reduction associated with the proposed project. As such, Alternative 3 ~~could have lesser impacts on recreation resources and opportunities than the project, specifically in regard to soaring opportunities.~~ Alternative 3 would continue to meet primary recreational objectives for the project by providing a trail that offers views of the Pacific Ocean, ~~that is ADA compliant,~~ and which achieves a safe connection between Carpinteria and the Rincon Beach County Park that can function as an alternative transportation mechanism. ~~This alternative would therefore have lesser impacts on recreation resources than the proposed project.~~

In order to capitalize on the existing historic bench that exists in the trail alignment for the portion south of the UPRR alignment, the design for Alternative 3 (refined) descends slightly more steeply from the UPRR over-crossing bridge, resulting in a trail surface slope of 6% as compared to the proposed project that employs a 5% grade along this trail segment (which measures approximately 690 feet in length). It should be noted that 5% is the maximum trail surface slope for a path/trail to be ADA compliant, and consequently the 690 foot portion of the trail southward of the UPRR crossing would not achieve ADA compliance under the refined Alternative 3. A definition of slope percent is useful for understanding this proposed trail surface slope. A 5% trail surface means that the elevation of the trail changes 5 vertical feet for every 100 feet of distance traveled along the trail. By comparison, a 6% trail would have a change in elevation of 6 feet for every 100 feet of travel. From a practical perspective, an increase of 1% slope in the trail surface over the ADA limit should not substantially reduce the usability of the trail segment south of the UPRR crossing. For bicycling, a slope of 4-6% is considered a manageable gradient (The Climbing Cyclist, 2013); the proposed trail slope would remain in this range. For walking or hiking, 5% slopes are comfortable, with a maximum slope of not more than 10% recommended to maintain enjoyment for the widest variety of trail users (Ventura County Trails, 2004). Persons with mobility limitations should be able to access the portion of the proposed Alternative 3 trail from the western terminus to the overlook at the south end of the UPRR crossing bridge, as this segment would achieve compliance with the ADA 5% maximum slope limit. Consequently, the incorporation of a 6% slope for a 690 foot portion of the trail segment south of the UPRR crossing would still support use of the entire project trail alignment by cyclists and pedestrians, while preservation of the trail surface slope at no greater than 5% for the remainder segments would allow access from Rincon Bluffs Preserve to the trail overlook on the south side of the UPRR bridge for visitors that may have mobility limitations. Recreation objectives of the project would therefore be substantially met under Alternative 3.

Furthermore, the U.S. Access Board (USAB) is responsible for developing accessibility guidelines for the construction and alteration of facilities covered by the Americans with Disabilities Act (ADA) of 1990 and the Architectural Barriers Act (ABA) of 1968. The guidelines ensure that the facilities are readily accessible to and usable by people with disabilities. The Access Board issued the current guidelines in 2004. According to the USAB guidelines,

segments of the trail may qualify for an exception to the maximum surface slope, where compliance is not practicable due to terrain. Not practicable may be defined as requiring extensive cuts or fills that are difficult to construct and maintain, cause drainage or erosion impacts, or create other adverse environmental impacts (<https://www.access-board.gov/aba/guides/chapter-10-outdoor/#conditions-for-exceptions-1019>). If this exception were to be granted for the 690-foot segment with 6% ground slope, the entire trail could potentially be considered ADA compliant. Because of the slightly greater slope percent (690 feet of the trail at 6% instead of 5%), the refined Alternative 3 would have marginally greater impacts on recreation than the project.

Transportation

Under Alternative 3, a multi-use trail for cyclists and pedestrians ~~identical~~ substantially similar to the project would be constructed and operated. In order to capitalize on the existing historic bench that exists in the trail alignment for the portion south of the UPRR alignment, the design for Alternative 3 (refined) descends slightly more steeply from the UPRR over-crossing bridge, resulting in a trail surface slope of 6% for a 690 foot portion as compared to the proposed project that employs a 5% grade along this trail segment; this slight increase in the proposed trail surface slope would not be expected to deter use of the trail by pedestrians or cyclists (refer to Recreation discussion above). Alternative 3 would therefore also close the substantial gap that currently exists in the Coastal Trail system, equivalent to the project. The use of a vehicle by residents in visiting the Rincon Beach County Park would be expected to decline under Alternative 3 as well, due to the existence of a new safe alternative to vehicle travel from points within Carpinteria. Transportation hazards associated with pedestrians crossing the UPRR alignment to navigate to Rincon Beach County Park would be resolved. In this regard, the enhancements of local and regional biking and hiking opportunities delivered by the project would occur under Alternative 3, and a solution to existing pedestrian hazards of the project would also be realized. This alternative would have transportation benefits and impacts equivalent to the project.

Utilities and Service Systems

Alternative 3 would involve an identical trail length to the project but would reduce ~~earthwork~~ excavation volumes by approximately 40 CY and exported earth materials volume by approximately 10,019 121 CY. Although Alternative 3 would result in these reduced earthwork volumes, impacts to existing drainage patterns of the site would still occur. Therefore, **MM-WAT-1, MM-WAT-2, MM-WAT-3, and MM-WAT-4** would continue to be required. Therefore, impacts to utilities and service systems would be similar under Alternative 3.

Relation to Project Objectives

~~Given that~~ Alternative 3 would employ substantially the same alignment as the proposed project and would incorporate an ~~identical~~ trail width the same as, or similar to, the project (the Alternative 3 trail would continue to have a paved width of 16 feet for the segments north of the UPRR corridor, but would employ a paved width of 14-feet south of the UPRR corridor). Alternative 3 would also be ADA compliant in the segments north of the UPRR corridor but would marginally exceed the 5% maximum allowable trail surface by 1% for a 690 foot segment of the trail south of the UPRR corridor. This alternative would be ~~equivalent~~ substantially comparable to the project in meeting all the stated project objectives, with the exception of an intent to ensure that the entire trail length would be accessible to individuals that have impaired mobility. It should be noted, according to USAB guidelines, segments of the trail may qualify for an exception to the maximum surface slope, where compliance is not practicable due to terrain. Not practicable may be defined as requiring extensive cuts or fills that are difficult to construct and maintain, cause drainage or erosion impacts, or create other adverse environmental impacts; If this exception were to be

granted for the 690-foot segment with 6% ground slope, the entire trail could potentially be considered ADA compliant.

The incorporation of a 6% slope for a 690 foot portion of the trail segment south of the UPRR crossing would still support use of the entire project trail alignment by cyclists and pedestrians, while preservation of the trail surface slope at no greater than 5% for the remainder segments would allow access from Rincon Bluffs Preserve to the trail overlook on the south side of the UPRR bridge for visitors that may have mobility limitations. With regard to the project objective of reducing regional greenhouse gas emissions, Alternative 3 would be marginally more successful in meeting this objective, as earthwork exported earth material volumes and therefore haul truck operations would be reduced under this alternative, leading to fewer construction equipment emission contributions to greenhouse gas levels.

6.6.4 Freeway Adjacent Trail Avoiding Bluff Face Alternative (Alternative 4)

Project Alternative 4 Impact Analysis

Biological Resources

Alternative 4 would overall disturb more area than the proposed project. The proposed project impacts a total of 5.05 acres and this alternative impacts a total of 6.10 acres, resulting in an increase of 1.05 acres. More specifically, the project would result in 4.32 acres of impacts to County ESH and City ESHA and this alternative would result in 5.21 acres of impacts to County ESH and City ESHA, resulting in an increase of 0.89 acres of impacts to County ESH and City ESHA.

Because the vast majority of impacts under the proposed project are occurring within sensitive native vegetation communities identified as County ESH and City ESHA and require mitigation, this alternative would result in more overall impacts and the mitigation measures associated with County ESH and City ESHAs would still be required. While more area is proposed to be impacted under this alternative, similar impacts to special-status wildlife species and nesting birds may occur and would require similar mitigation. Therefore, due to the increased overall direct impacts to sensitive native vegetation communities identified as County ESH and City ESHA, impacts to biological resources would be increased under the Freeway Adjacent Trail Avoiding Bluff Face Alternative, Alternative 4, and MM-BIO-1 through MM-BIO-7 would continue to be required to address potentially significant biological resources impacts under Alternative 4.

~~Based on impacts within the biological survey area, this alternative would result in a decrease of impacts to sensitive biological resources. However, since a portion of the trail alignment under this alternative has not been surveyed (vegetation mapping, special-status plant species, wildlife species, and tree assessment) a complete comparison analysis cannot be performed to determine if impacts to sensitive biological resources would be increased or reduced under the Freeway Adjacent Trail Avoiding Bluff Face Alternative. Therefore, additional surveys to detect potential sensitive biological resources would be required, and would include vegetation mapping, special-status plant species surveys, a special status wildlife species habitat assessment, and a tree assessment. While it is unlikely that additional special-status plant or wildlife species may be present along the new trail alignment, since it is located within similar habitats and along previously disturbed and graded slopes within the proposed project footprint, this alternative may result in greater impacts to sensitive vegetation communities included as County ESH and City ESHA, and qualifying trees. The trail alignment under Alternative 4 is longer as compared to the proposed project resulting in more permanent impacts to undeveloped land, and may require removal of eucalyptus trees~~

located at the eastern terminus of the Rincon Beach County Park parking lot, which are qualifying trees and require mitigation for removal under Santa Barbara County Article II Zoning Ordinance. Therefore, Alternative 4 may require additional mitigation for impacts to sensitive vegetation communities, including County ESH and City ESHA. More specifically, Alternative 4 may result in greater areas of impacts to vegetation communities and therefore require greater mitigation acreages, outlined in a Habitat Mitigation and Monitoring Plan (see **MM-BIO-5**). Mitigation for removal of any qualifying trees impacted would also be required under Alternative 4. Similar impacts to special-status wildlife species and nesting birds are anticipated and would require similar mitigation.

Cultural Resources

Alternative 4 would result in greater ground disturbance compared to the proposed project, due to the longer length of the trail. It is anticipated that impacts to existing cultural resources would still occur, and that potential impacts to undiscovered cultural resources, including archaeological resources and human remains would be greater due to greater the increased area of development. However, the presence of cultural resources within the area expanding the project footprint southeast, past the Rincon Beach County Park, and terminating at Bates Road, are unknown at this time. Although the proposed additional ground disturbance for Alternative 4 extends into a previously recorded archaeological site, there is significant evidence that the proposed ground disturbance would occur within previously disturbed soils and imported fill soils. The area unique to Alternative 4 area proposed, or expanding the project footprint southeast, past the Rincon Beach County Park, and terminating at Bates Road, has been subject to significant ground disturbances including massive cut and fill grading and construction of the following: original UPRR railroad, original and widening of Highway 2, Highway 101 road and ramp construction, and the Bates Road overcrossing. Evidence of ground disturbance is documented in as-built plans for Highway 101 and the archaeological site record for CA-SBA-1 and associated field notes. The full potential presence and extent of cultural resources within the area expanding the project footprint are not fully known at this time since evidence points to any existing native soils being buried by several feet of disturbed and fill soils. Therefore, development in this area would require additional investigation to appropriately determine the presence of existing cultural resources and potential impacts to these resources. MM-CUL-1 through MM-CUL-4 would still be required. Due to the longer length of the trail under Alternative 4, impacts to cultural resources would be slightly greater than the proposed project and additional , but would be appropriately addressed through implementation of MM-CUL-1 through MM-CUL-4. mitigation may be required.

Section 8, References

Section 3.3 Biological Resources

Calflora. 2021. Search for Plants. <https://www.calflora.org/>. Accessed. June 3, 2021

LSA Associates Inc. 1997. Evaluation Report Carpinteria Bluffs Biological Resources and Environmentally Sensitive Habitat Areas. Prepared for: City of Carpinteria. May 29.

Magney, David L. 2020. Checklist of Ventura County Rare Plants. California Native Plant Society, Rare Plant Program, Locally Rare Project. Updated September 21, 2020. <http://www.cnpsci.org/html/PlantInfo/ChecklistofVenturaCountyRarePlants-24thEdition-20200921.pdf>

NatureServe. 2020. *NatureServe Explorer: An Online Encyclopedia of Life*. Arlington, Virginia: NatureServe. Accessed December 2020. <https://explorer.natureserve.org/AboutTheData/Statuses>.

USFWS. 2021. Listed Plants. Environmental Conservation Online System. <https://ecos.fws.gov/ecp0/reports/ad-hoc-species-report?kingdom=P&status=E&status=T&status=EmE&status=EmT&status=EXPE&status=EXPN&status=SAE&status=SAT&mapstatus=3&fcrithab=on&fstatus=on&fspecrule=on&finvpop=on&fgroup=on&ffamily=on&header=Listed+Plants>. Accessed June 3, 2021.

USDOI, BLM. (U.S. Department of the Interior, Bureau of Land Management). 2015. BLM Special Status Plants under the jurisdiction of the California State Office as of May 28, 2015. [programs-natural-resources-native-plants-california-special-status-plants-concise-list_1.pdf](https://www.blm.gov/sites/default/files/2015-06/programs-natural-resources-native-plants-california-special-status-plants-concise-list_1.pdf) (blm.gov). Accessed June 3, 2021.

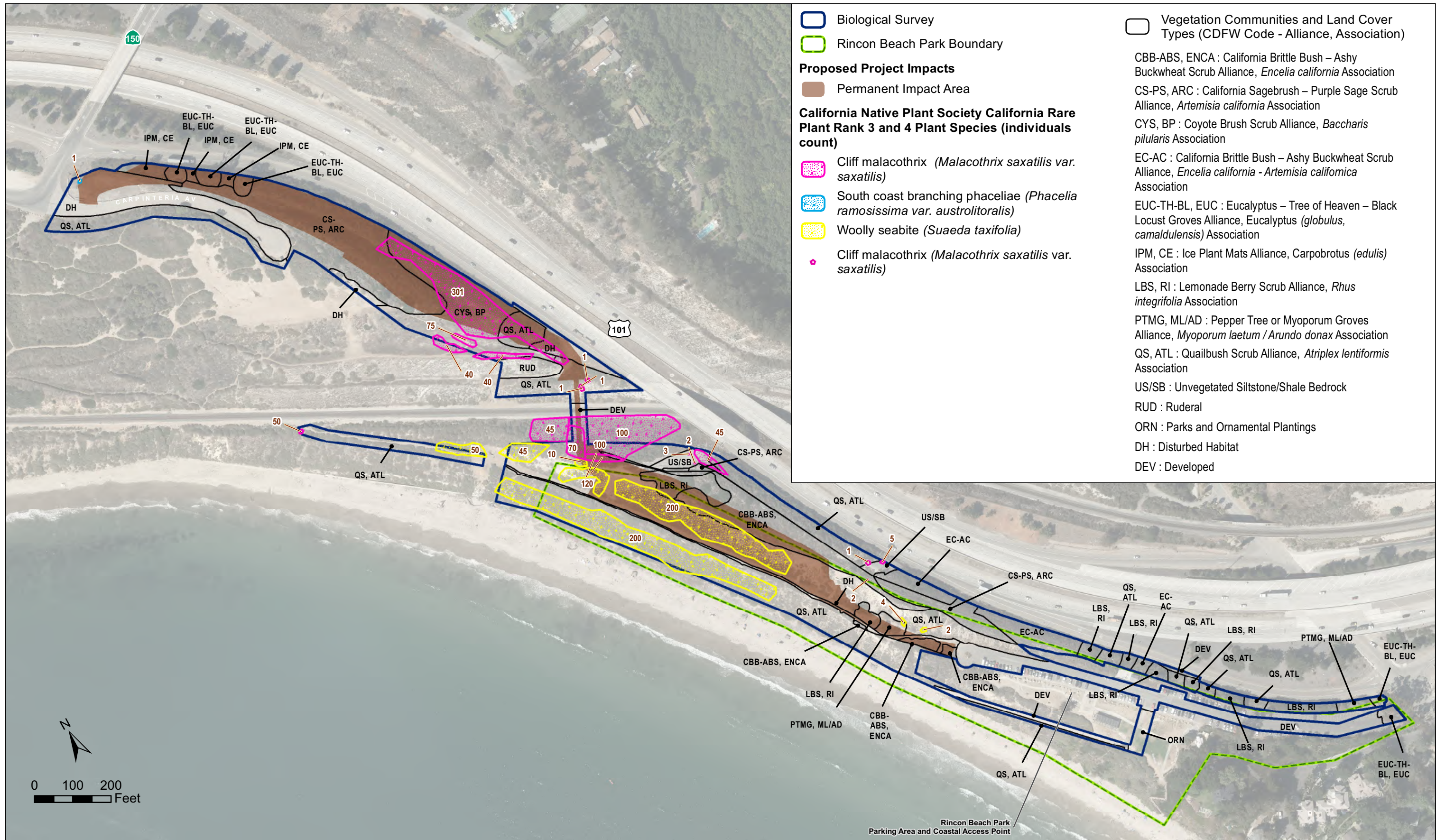
USFS (U.S. Forest Service). 2005. Forest Service Sensitive Species that are not listed or proposed under the ESA. [Copy of publicFinal USFS SS list updates 2005.xls](#). Accessed June 3, 2021

Section 3.8 Recreation

The Climbing Cyclist. 2013 Gradients and Cycling. <http://theclimbingcyclist.com/gradients-and-cycling-an-introduction/>. Accessed November 1, 2021.

Ventura County Trails. 2004. Trail Difficulty Rating System. <https://www.venturacountytrails.org/TrailMaps/TrailSymbols.htm>. Accessed November 1, 2021

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AERIAL SOURCE: Sanborn 2020
ENGINEERING SOURCE: Bengal 2021

FIGURE 3.3-1
Biological Resources

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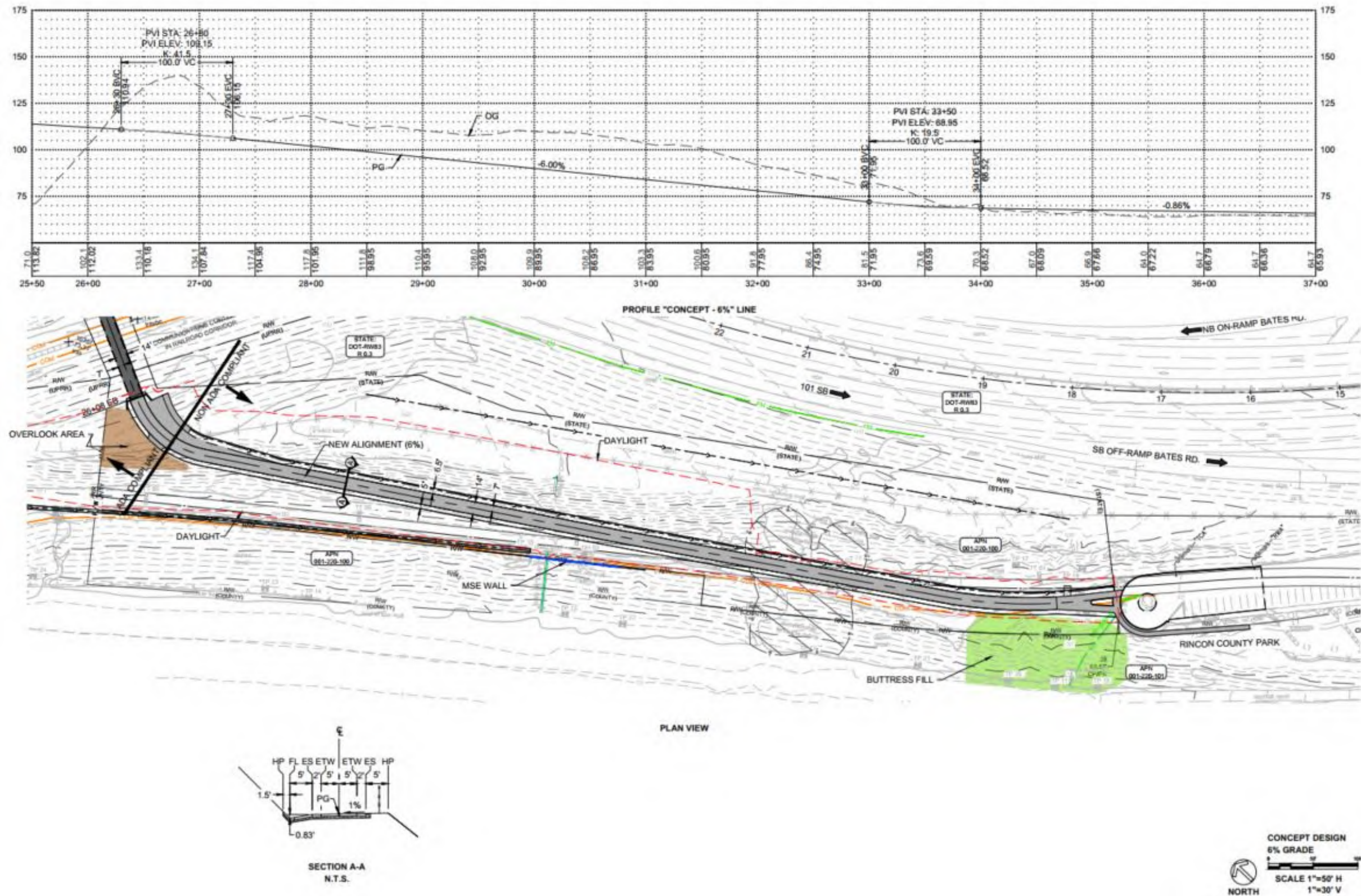


FIGURE 6.2

Concept Design Alternative 3

Carpinteria Rincon Trail EIR

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Appendix C1, Plant and Wildlife Species Compendium

ASTERACEAE—SUNFLOWER FAMILY

Artemisia douglasiana—Douglas' sagewort

BRASSICACEAE—MUSTARD FAMILY

* Sisymbrium altissimum—tall tumbled mustard

CRASSULACEAE—STONECROP FAMILY

Dudleya edulis—fingertips

LAMIACEAE—MINT FAMILY

* Salvia mellifera—black sage

RUBIACEAE—MADDER FAMILY

Galium aparine—stickywilly

Appendix C2, Plant and Wildlife Species Not Expected to Occur within the Biological Survey Area

Special-Status Plant Species Not Expected to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ¹	Habitat Requirements	Potential to Occur within the BSA
<i>Arenaria paludicola</i>	marsh sandwort	FE/SE/1B.1	Marshes and swamps (freshwater or brackish); sandy, openings/perennial stoloniferous herb/May–Aug/10–560	Not expected to occur. Suitable marsh or swamp habitat is not present.
<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i>	Ventura marsh milk-vetch	FE/SE/1B.1	Coastal dunes, Coastal scrub, Marshes and swamps (edges, coastal salt or brackish)/perennial herb/(June)Aug–Oct/3–115	Not expected to occur. While suitable coastal scrub habitat is present, this species rarely occurs on sandy bluffs as compared to within coastal salt marsh margins or coastal dunes (CDFW 2020). There is only one occurrence in the region ² which is considered

Special-Status Plant Species Not Expected to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ¹	Habitat Requirements	Potential to Occur within the BSA
				possibly extirpated (CDFW 2020).
<i>Calochortus fimbriatus</i>	late-flowered mariposa lily	None/None/1B.3	Chaparral, Cismontane woodland, Riparian woodland; often serpentinite/perennial bulbiferous herb/June–Aug/902–6,250	Not expected to occur. The site is outside of the species' known elevation range. Additionally, suitable habitat is not present.
<i>Calochortus palmeri</i> var. <i>palmeri</i>	Palmer's mariposa lily	None/None/1B.2	Chaparral, Lower montane coniferous forest, Meadows and seeps; mesic/perennial bulbiferous herb/Apr–July/2,325–7,840	Not expected to occur. The site is outside of the species' known elevation range. Additionally, suitable habitat is not present.
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	salt marsh bird's-beak	FE/SE/1B.2	Coastal dunes, Marshes and swamps (coastal salt)/annual herb (hemiparasitic)/May–Oct(Nov)/0–100	Not expected to occur. Suitable dune, marsh, or swamp habitat is not present.
<i>Delphinium umbraculorum</i>	umbrella larkspur	None/None/1B.3	Chaparral, Cismontane woodland/perennial herb/Apr–June/1,310–5,245	Not expected to occur. The site is outside of the species' known elevation range. Additionally, suitable habitat is not present.
<i>Fritillaria ojaiensis</i>	Ojai fritillary	None/None/1B.2	Broadleafed upland forest (mesic), Chaparral, Cismontane woodland, Lower montane coniferous forest; rocky/perennial bulbiferous herb/Feb–May/738–3,270	Not expected to occur. The site is outside of the species' known elevation range. Additionally, suitable habitat is not present.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Coulter's goldfields	None/None/1B.1	Marshes and swamps (coastal salt), Playas, Vernal pools/annual herb/Feb–June/3–4,000	Not expected to occur. Suitable vernal pool, playa, marsh, or swamp habitat is not present.

Special-Status Plant Species Not Expected to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ¹	Habitat Requirements	Potential to Occur within the BSA
<i>Layia heterotricha</i>	pale-yellow layia	None/None/1B.1	Cismontane woodland, Coastal scrub, Pinyon and juniper woodland, Valley and foothill grassland; alkaline or clay/annual herb/Mar–June/984–5,590	Not expected to occur. The site is outside of the species' known elevation range. Additionally, only marginally suitable habitat is present.
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>	white-veined monardella	None/None/1B.3	Chaparral, Cismontane woodland/perennial herb/(Apr)May–Aug(Sep–Dec)/164–5,000	Not expected to occur. No suitable chaparral or woodland habitat present. Although this species is mapped along Rincon Creek all the way to the ocean just behind the project site, it is associated with the riparian habitat of the creek which is not present on site (CDFW 2020).
<i>Nasturtium gambelii</i>	Gambel's water cress	FE/ST/1B.1	Marshes and swamps (freshwater or brackish)/perennial rhizomatous herb/Apr–Oct/16–1,080	Not expected to occur. Suitable marsh or swamp habitat is not present.
<i>Navarretia fossalis</i>	spreading navarretia	FT/None/1B.1	Chenopod scrub, Marshes and swamps (assorted shallow freshwater), Playas, Vernal pools/annual herb/Apr–June/98–2,145	Not expected to occur. Although chenopod scrub habitat is present, vernal pools are absent within the project site. This species is not known to occur within the region ² (CDFW 2020).
<i>Navarretia ojaiensis</i>	Ojai navarretia	None/None/1B.1	Chaparral (openings), Coastal scrub (openings), Valley and foothill grassland/annual herb/May–July/902–2,030	Not expected to occur. The site is outside of the species' known elevation range.

Special-Status Plant Species Not Expected to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ¹	Habitat Requirements	Potential to Occur within the BSA
<i>Navarretia peninsularis</i>	Baja navarretia	None/None/1B.2	Chaparral (openings), Lower montane coniferous forest, Meadows and seeps, Pinyon and juniper woodland; mesic/annual herb/(May)June–Aug/4,920–7,545	Not expected to occur. The site is outside of the species' known elevation range. Additionally, suitable habitat is not present.
<i>Nolina cismontana</i>	chaparral nolina	None/None/1B.2	Chaparral, Coastal scrub; sandstone or gabbro/perennial evergreen shrub/(Mar)May–July/459–4,180	Not expected to occur. The site is outside of the species' known elevation range.
<i>Orcuttia californica</i>	California Orcutt grass	FE/SE/1B.1	Vernal pools/annual herb/Apr–Aug/49–2,165	Not expected to occur. Suitable vernal pool habitat is absent within the project site. Additionally, this species is not known to occur within the region ² (CDFW 2020).
<i>Sagittaria sanfordii</i>	Sanford's arrowhead	None/None/1B.2	Marshes and swamps (assorted shallow freshwater)/perennial rhizomatous herb (emergent)/May–Oct(Nov)/0–2,130	Not expected to occur. Suitable marsh or swamp habitat is not present. Additionally, the only one occurrence in the region ² is considered extirpated (CDFW 2020).
<i>Sidalcea neomexicana</i>	salt spring checkerbloom	None/None/2B.2	Chaparral, Coastal scrub, Lower montane coniferous forest, Mojavean desert scrub, Playas; alkaline, mesic/perennial herb/Mar–June/49–5,015	Low potential to occur. Suitable coastal scrub habitat is present, however mesic habitats such as springs or marshes are absent. The only occurrence in the region ² was last confirmed in 1962 and is located in Oak View (CDFW 2020). This species was not detected during 2018, 2019, or 2021 special-status plant species surveys.

Special-Status Plant Species Not Expected to Occur within the Biological Survey Area

Scientific Name	Common Name	Regulatory Status ¹	Habitat Requirements	Potential to Occur within the BSA
<i>Streptanthus campestris</i>	southern jewelflower	None/None/1B.3	Chaparral, Lower montane coniferous forest, Pinyon and juniper woodland; rocky/perennial herb/(Apr)May–July/2,950–7,545	Not expected to occur. The site is outside of the species' known elevation range. Additionally, suitable habitat is not present.
<i>Thelypteris puberula</i> var. <i>sonorensis</i>	Sonoran maiden fern	None/None/2B.2	Meadows and seeps (seeps and streams)/perennial rhizomatous herb/Jan–Sep/164–2,000	Not expected to occur. Suitable meadow or seep habitat is not present.

¹ Status Legend:

FE: Federally listed as endangered

SE: State listed as endangered

CRPR 1A: Plants presumed extinct in California

CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere

CRPR 2A: Plants rare, threatened, or endangered in California but common elsewhere

CRPR 2B: Plants rare, threatened, or endangered in California but more common elsewhere

CRPR 3: Plants about which more information is needed – a review list

CRPR 4: Plants of limited distribution – a watch list

.1 Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)

.2 Fairly endangered in California (20% to 80% of occurrences threatened)

.3 Not very endangered in California (less than 20% of occurrences threatened or no current threats known).

² **Region:** "Region" refers to species recorded in the USGS 7.5-minute White Ledge Peak quadrangle, as well as the surrounding coastal quadrangles including Carpinteria, Pitas Point, Ventura, and Matilija (CDFW 2020; CNPS 2020).