



City of Santa Barbara California

PLANNING COMMISSION STAFF REPORT

REPORT DATE: July 10, 2008
AGENDA DATE: July 10, 2008
PROJECT LOCATION: County of Santa Barbara Mission Canyon Area
 City of Santa Barbara Specific Plan Area #3
 City of Santa Barbara Sphere of Influence Area
TO: Planning Commission
FROM: Planning Division, (805) 564-5470
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 Heather Baker, AICP, Project Planner *HB*

I. INTRODUCTION

Mission Canyon, in the County of Santa Barbara, is within the City's Sphere of Influence. In 1984, a Joint Powers Agreement (JPA) between the County and City of Santa Barbara was adopted with a provision that sewer service for some areas of the Canyon would be provided by the City contingent upon the adoption of a County Specific Plan approved by the City. The Mission Canyon Specific Plan was subsequently approved by the City as Specific Plan 3 (SP-3). The JPA states that any amendments to the Specific Plan must be approved by both the City and the County. The County has proposed an update of the Mission Canyon Specific Plan through the adoption of the proposed Mission Canyon Community Plan (Attachment A) and Design Guidelines (Attachment B). In 2006, the County Board of Supervisors appointed a Mission Canyon Planning Advisory Committee (MCPAC) to assist Long Range Planning staff in drafting the Mission Canyon Community Plan and development of new residential design guidelines for the area. The MCPAC has been meeting since December 2006, working closely with County staff and the Mission Canyon community on the Mission Canyon Community Plan. The Plan was initiated by the County Planning Commission on June 4, 2008. The first major step in the City's consideration of the Community Plan is to initiate the Community Plan for review. Initiation is scheduled to be followed by environmental review, revised Community Plan document reviews and finally adoption of the Community Plan by both the County and City. County staff projects adoption to occur by Summer 2009. Addison Thompson and John Jostes of the City Planning Commission attended the County Planning Commission Initiation Hearing for the documents on June 4, 2008.

II. RECOMMENDATIONS

Staff recommends that the Planning Commission initiate the process for approval of the Draft Mission Canyon Community Plan to replace City Specific Plan 3. **This initiation does not imply any approval of, or formal position on a future Specific Plan Amendment other than acknowledging that the proposed change can proceed for further study and environmental review.** Staff also

requests that the Planning Commission make comments on the Draft Mission Canyon Community Plan and Guidelines, acknowledging both the positive aspects and any concerns.

III. PROJECT DESCRIPTION

Please refer to the County of Santa Barbara Staff Report for the County Planning Commission Initiation of the Plan, Exhibit C, for detailed background information about the Plan Area, reasons for the Plan initiation and significant issues addressed by the Plan. Following is the project description for the Mission Canyon Community Plan document. The Staff Report also describes the Residential Design Guidelines and Land Use and Development Code Amendments.

“The Mission Canyon Community Plan is intended to direct all aspects of preservation and development, including both policy and regulatory elements used in evaluating future development projects. The Community Plan will replace the 1984 Mission Canyon Area Specific Plan, and contains goals, policies, development standards and actions intended to regulate and guide future development and improvements.”

IV. MAJOR POSITIVE COMMENTS

Overall, the proposed amendments to the original Mission Canyon Specific Plan appear to provide important improvements. For example, the City finds the following proposals to be significant improvements over the current Plan: removing the possibility for new second units in the Extreme High Fire Area, new wastewater treatment standards, the creation of the Mission Canyon Scenic Corridor, new energy conservation standards, and the proposed implementing Design Guidelines.

A. ELIMINATION OF RESIDENTIAL SECOND UNITS. Given the unique constraints of the Plan area, the City fully supports the proposal to eliminate the allowance for residential second units in the Plan. The City prohibits second units in designated High Fire Hazard Areas because of safety and evacuation concerns.

B. WASTEWATER TREATMENT STANDARDS IMPROVEMENTS.

Sewer Service. Sewer service in the lower portion of Mission Canyon is provided by the County of Santa Barbara, which in turn conveys wastewater into the City's wastewater system for treatment under a Joint Powers Agreement (JPA) between the City and the County. The JPA provided for the County to pay for improvements to the City's collection system to accommodate flow from Mission Canyon and specifies a formula by which the County reimburses the City for the ongoing costs of operating and maintaining the wastewater system. These costs, plus the cost of operating the collection system in Mission Canyon, are the basis for sewer service rates paid by Mission Canyon residents. The JPA would be the basis for future sewer service in Mission Canyon. The El Estero Plant Wastewater Treatment Plant was built for a design capacity 11.0 mgd dry weather flow. At present the plant is operating at 73% plant capacity. It is anticipated that provisions will be needed for buy-in fees for dwelling units beyond those provided for in the JPA and for potential additional improvements to the City's collection system to accommodate the increased flows.

The City supports Action WW-MC-1.10 regarding inter-agency coordination to define areas where extending public sewer service and infrastructure may be appropriate and feasible. The City plans to continue to work together with the County regarding completing a feasibility study for sewer extension to some portions of Mission Canyon.

On-Site Wastewater Treatment Improvements. The City supports Policy WW-MC-1 and all associated items. Maintaining water quality and ensuring 75 years of reliable septic disposal ability to the maximum extent feasible is appropriate in Mission Canyon.

C. COMPATIBILITY WITH ADJACENT SANTA BARBARA HISTORIC MISSION. Due to the Plan's proximity to the nationally registered historic Mission, the City supports the proposal for the "Mission Canyon Scenic Corridor."

Minor Associated Suggestions

Jake Jacobus, City Staff Urban Historian, suggests "Table 13" on page 127 further establish the historic nature of the corridor. Mr. Jacobus suggests expanding the information for Map Reference Numbers 1, 2, and 5 as follows. Underlining indicates suggested new text.

Table 13, Item 1: Designated as City Landmarks, Mission Santa Barbara and Mission Historical Park are historically significant at the National, State, and local levels. Remnants of the aqueduct, built to convey water from the Mission Dam in the Botanic Garden to the Mission, can be seen on both sides of Los Olivos Road.

Table 13, Item 2: Built in 1891 to replace a wooden bridge, the stone bridge over Mission Creek is the oldest bridge in the County. The bridge signals the transition into Mission Canyon with views of Mission Creek and sycamores and oaks.

Table 13, Item 5: Adjacent to Rocky Nook Park is the Woman's Club, an attractive building designed by the significant architectural firm of Edwards, Plunkett, and Howell in 1927.

D. 2030 ENERGY CHALLENGE. As a participant in the National 2030 Energy Challenge Program, the City of Santa Barbara recently adopted and new energy ordinance which requires projects to have energy efficiency at a level 20% beyond what Title 24 requires. The City is pleased to see that a similar proposal is included as Policy PS-MC-1 on page 75. Regional coordination on important energy issues is essential to address climate change.

E. RECREATION PLANNING. Staff supports Area Plan Goal PRT-MC-1 on pages 56-57 regarding recreational opportunities and its associated policy, development standards and actions. See Comment 4 regarding recommended front yard fences, walls, and hedge regulations which would further support trail recreational opportunities in the area.

F. DESIGN GUIDELINES. Staff believes the addition of Design Guidelines are a good complement to the County's Community Plan. The current Draft Guidelines are similar in many ways to the City of Santa Barbara Single Family Residential Design Guidelines (SFDG) and should prove to be very useful to the Santa Barbara Board of Architectural Review

(SBBAR) and applicants. However, see comments under “Minor Issues” regarding how the Guidelines might be further strengthened with incorporation of more quantitative guidelines.

V. MAJOR ISSUES

City Staff provided comments to County Staff on an Administrative Draft version of the proposed Plan on March 12, 2008. A number of the comments from staff were addressed and a number of items are outstanding. Major comments in this section encourage continuity of land development patterns between the City and County, address fire and general transportation safety and biological resource protection issues. Minor suggestions which relate to major issue topics are also listed in this report section. Where specific wording changes are suggested to the Plan or Guidelines, underlining indicates suggested new text and ~~strike-out~~ indicates text suggested for deletion.

A. LAND USE DEVELOPMENT DENSITIES

Comment 1: p. 14 – 18. There are a substantial number of new units which could be located on existing 1-E-1 and other parcels in the Plan area according to the proposed Plan area zoning. The minimum lot size specified by the City for properties adjacent to the Plan area to the east is one acre with additional slope density requirements listed below. It appears from the map on page 113 of the Initiation Draft Plan that the average parcel slope of 1-E-1 zoned properties may be greater than greater than 20% in many cases. The City of Santa Barbara uses “Slope Density Requirements”, as shown below, to increase the minimum size of sloped lots per the table, below.

SLOPE DENSITY: The minimum lot areas specified shall be increased as follows:

Average Slope of Entire Parcel	Increase in Minimum Lot Size
0.000-9.999%	No increase in minimum lot size
10.000-20.000%	1.5 times minimum lot size
20.001-30.000%	2 times minimum lot size
30+%	3 times minimum lot size

The Plan includes an action item to study the feasibility of extending sewer into the lower half of the Maintenance area. Sewer extension to areas which currently have no sewer service and are vacant could allow more development than is currently allowed. The table on page 33 indicates a potential for an additional 157 units through build out if 30%+ slope lots are excluded from the build out calculation. If slope density requirements similar to those which the City implements were applied in Mission Canyon, the number of potential new units could probably be significantly reduced. Fewer potential new units in the area would be desirable to maintain fire safety and water quality. Additional residents in the Canyon would exacerbate current fire evacuation issues in the Canyon and likely result in degradation to area creek water quality. The City appreciates the prohibitions on certain kinds of development on slopes greater than 20% or 30% as outlined on page 118 in Policy GEO-MC-1, but additional provisions to allow fewer overall units in the Plan area may be appropriate.

Associated Minor Suggestion

Page 28: List and show the adjacent City of Santa Barbara Land Uses designations on the map.

B. FIRE SAFETY. The City of Santa Barbara Fire Department generally supports the Fire Protection section of the Mission Canyon Community Plan. If the area was in the City of Santa Barbara, Mission Canyon would be located in the Extreme Foothill Zone as delineated in the City of Santa Barbara Wildland Fire Plan. Portions of the City flank Mission Canyon to the east and west. Those areas are also in the City's Extreme Foothill Zone, which corresponds to the Very High Fire Hazard Severity Zone for Local Responsibility Areas (LRA's) as described by the California Department of Forestry and Fire Protection. The Plan outlines cooperative, multi-jurisdictional efforts to improve fuels management and City staff believes that such efforts should be an ongoing part of the Community Plan, along with evacuation preplanning and addition of a Wildland Fire Benefit Assessment District as noted on page 50 of the Plan. The following are advisory comments to enhance fire and life safety.

Comment 2: Defensible Space

1. In the Extreme Foothill zone, the Santa Barbara City Fire Department recommends a minimum of 150' of defensible space. If slopes within the project area are greater than 30%, the City may recommend a minimum of 200' of defensible space.
2. The City Fire Department recommends greater enforcement of current defensible space requirements for Mission Canyon homeowners.

Comment 3: Evacuation Preplanning. In comments for the Botanic Garden Draft EIR in 2007, the City noted that Mission Canyon presents extraordinary challenges for further development. Intensification of development of Mission Canyon increases the already challenging problems associated with a large evacuation of the area, should it become necessary, and therefore all recommended mitigation measures should be carefully considered. In addition to recommending a Wildland Fire Benefit Assessment to enhance fire protection and increase awareness, the City recommends further evacuation preplanning.

Although the Community Plan does not support designated evacuation routes, we encourage enhanced evacuation preplanning for the Canyon, including coordination with the City to establish additional emergency access and egress routes.

C. ROAD ACCESS FOR FIRE AND TRANSPORTATION SAFETY

Comment 4: 3 ½ foot front property line wall height limit. Fences, walls, and landscaping at the front property line or along driveways hinder visibility for pedestrians, bicyclists, equestrians, and vehicles exiting property driveways. Tall fences, walls and landscaping on the front property line are a concern where they are adjacent to driveways as fire truck access to sites can be severely limited. Fire and general transportation safety would be increased by limiting tall fences, walls and hedges along front property lines, which would increase sight

distance for vehicle egress and road traffic (vehicle/bicycle/emergency apparatus/pedestrian) moving through the area.

The City recommends that a development standard be added limiting the height of such vertical obstructions for safety reasons. The City's regulations allow for a maximum height of 42 inches (3 ½ feet) to maintain overall visibility. The City prohibits walls taller than 3 ½ feet within 10 feet of the front property line per Municipal Code 28.87.170.2. In some unique cases, where a taller fence, wall or hedge would be an appropriate improvement which would not impede safety, an application can be made to allow a "modification" to the Zoning Ordinance for a project. Staff recommends consideration of including a standard for walls and fences to be no taller than 3 ½ feet within at least 10 feet of the front property line. Besides improving safety, this will create a cohesive aesthetic feeling between the City and the County's Mission Canyon Area.

Comment 5: Consider the feasibility of entering into an inter-jurisdictional vegetation road clearance program within the Mission Canyon area to provide safe ingress and egress.

Comment 6: Bridges within the Mission Canyon Plan area should meet 60,000 pound minimum weight capacity to match City requirements. The City provides back-up Fire service in the Mission Canyon Plan area, and heavy fire trucks need to be able to safely access the upper reaches of Mission Canyon.

Comment 7: Policies CIRC-MC-3 and CIRC-MC-7 on page 70 appear to conflict with each other. MC-3 calls for maintaining landscaping along roadways to the maximum extent feasible and MC-7 instructs the County to actively abate such landscaping if it is illegal. The policies should clearly identify which items the community/county is trying to protect and those that require removal. Perhaps deleting the word "landscaping" from Policy CIRC-MC-7 would clarify that Policy CIRC-MC-3 addresses landscaping, while Policy CIRC-MC-7 addresses structure. Staff supports abatement of roadway encroachments to further Fire and Transportation safety.

Comment 8: Parking and an emergency turn around are not likely to both fit on the City-owned parcel at the end of Tunnel Road as referenced in Action CIRC-MC-3.3 on page 71. The uses would each need separate areas, since the uses are not compatible. The action item should list parking or an emergency turn around as the potential action item, rather than both.

Related Minor Suggestions

The third sentence of Development Standard FIRE-MC-2.1 on page 51 would be better separated into a separately numbered development standard. Oak trees in relation to roadways which are not required access should be a separate development standard for the purpose of clarity.

The City, County and State Fire Codes call for a minimum vertical clearance of 13'6" on required access roadways. For clarity, the following is suggested for the first sentence of Development Standard FIRE-MC-2.1. "Along required access roads and driveways, limbing of oak tree branches shall be subject to the vertical clearance requirements of the California Fire Code (a clearance minimum of 13'6") and Santa Barbara County Fire Department Development Standards. To the maximum extent feasible, vegetation management practices shall not result in the removal of protected healthy oak trees."

Design Guidelines Landscaping and Retaining Walls Item 7.11 on page 55.

Further guidelines to avoid long and tall front property line walls, fences and hedges are suggested. For example, the City's Single Family Design Guidelines (SFDG) page 56-H (in Attachment D) suggests the minimization of solid fences and walls to less than 50' in length and suggests heights less than 6' tall.

Encourage fences, hedges and walls to be set back for informal shoulder areas. Also, encouraging walls to be further setback from front property lines along existing substandard roadways can create additional opportunities for informal safety pull out areas. In the case of an emergency, as residents travel down substandard road widths, it can be difficult for support fire trucks to travel up the Canyon. Therefore, informal shoulder areas along substandard road widths could be helpful during evacuations. The City has not implemented a policy or guideline like this for the Riviera. However, such guidelines could be considered in the future for existing substandard road width areas in the City. It is also possible that traffic safety issues related to wildlife could become more important in Mission Canyon if walls and fences make private properties increasingly uncrossable to wildlife over time. Encouraging front yard wall setbacks might, for example, allow room for deer to be adjacent to some roadway segments, rather than on roadways, potentially improving traffic safety in some areas.

Related Positive Comment

Reducing cars parked on substandard width roads. The City supports Action CIRC-MC-3.2 on page 71, as it appears to suggest parking strategies be designed for safety reasons which could include removal of on street parking. If, as a result, fewer cars are parked on existing substandard width roadways, better fire access and traffic safety could be achieved.

D. FEDERALLY ENDANGERED STEELHEAD TROUT PROTECTION

The City of Santa Barbara has found it challenging to establish appropriate required creek setback standards throughout the City's jurisdiction due to the extent of urban development adjacent to the creeks. The City's General Plan Conservation Element, adopted in 1978, directed that appropriate creek setback standards be established throughout the City; however, such action has not been carried out beyond the existing Mission Creek 25' setback and informal 25' creek setbacks for other parts of the City, along with case-by-case analysis of individual projects. On a case-by-case basis, most setbacks have been 30' to 50' in the urban areas and occasionally as much as 100'. Typically, the current setbacks are applied in non-high fire hazard urban areas, where fire clearance is not an issue and creek habitat protection and

flood protection are the goals of the setback. Hillside projects in areas of the City with larger lots subject to discretionary Planning Commission Review are less common, but those that are reviewed are recommended to have 150' setbacks on a case by case basis. In 2003, a proposal for creek setbacks was made, featuring graduated setbacks, with urban areas to have 50' setbacks from creeks and the upper watershed to have 150' setbacks to allow for 100' of fire clearance and 50' of habitat preservation adjacent to the creek. However, many concerns were raised within the community. As a result, formalizing preferred creek setbacks is still a program goal for the City of Santa Barbara. A Watershed Management Plan, the current City General Plan Update process or other mechanisms may be used in the future to implement greater formal creek setbacks.

The City recognizes the value of protecting the federally listed endangered species Southern California Steelhead Trout, which used to spawn in the upper reaches of Mission Canyon. The City is embarking on creek enhancement projects with the California Department of Fish and Game (CDFG). To date, approximately \$300,000 has been granted by the CDFG for the City to create design plans for improving Steelhead Trout passage on Mission Creek at the Caltrans Channel, Tallent Road Bridge and Highway 192 bridge. Currently, the City has another \$500,000 grant application with the CDFG to perform additional design work. The estimated cost for constructing these improvements to allow Steelhead to migrate upstream are still very preliminary but the initial estimates are in the range of 15 million dollars. Once these improvements are complete (expected within 5 years), the trout will be able to access good spawning and rearing habitat within upper Mission and Rattlesnake Creeks.

The Steelhead Trout is an endangered species with as few as 300-500 individuals remaining in the wild Evolutionarily Significant Unit (ESU) of which Mission Creek is a part. The best water quality and trout spawning conditions are located within the upper watershed of Mission Creek (within the boundaries of the Mission Canyon Plan). Given the significant investment in public funds which is planned for habitat enhancement in the lower Mission Creek, good water quality currently available in the upper reaches of Mission Creek, and high biological value of the upper Mission Creek (including endangered species habitat), it makes sense to further expand creek setbacks for Mission and Rattlesnake Creeks within the County, where the fish would be likely to spawn. For proper spawning habitat, appropriate temperature, water flows, water quality and creek bottom material must be present. Providing adequate setbacks from the creeks for development and fire clearance activity will help ensure that good water quality and appropriate spawning conditions are maintained within upper Mission Creek watershed.

Because a number of parcels along Mission Creek have already been developed with structures within close proximity to Mission Creek, it is imperative that additional development not be placed within close proximity to the creek in order to preserve the valuable water quality and habitat resources within the upper Mission Creek watershed. Given that there are so few undeveloped parcels, it is important that increased development of existing structures that are already within 50-150 feet of the creek be carefully regulated to be as far away from the creek as practicle. Carefully written requirements for improvements to "nonconforming structures" will afford crucial habitat protection.

In addition to the importance of requiring development additions to be located away from creeks, another issue is allowing construction of dams in the creek as described in development standard BIO-MC-6.3. Dams and/or grade control structures within creek channels to protect development that has been located too close to the creek or to protect undersized bridges is probably the number two reason for the steelhead trout being listed as endangered within Southern California (with the primary cause probably being large dams for reservoirs). To continue allowing these structures within Mission Creek would undermine City and CDFG efforts to restore a healthy population of Steelhead Trout in the Mission Creek. It should also be noted that protection of Steelhead will have important secondary effects, including protection of other sensitive species, improved habitat, better water quality and other benefits. Per Appendices D and E of the Plan, other plant species which would benefit from increased habitat protection along creeks would include: California Red-legged Frog, Southwestern Pond Turtle, Cooper's Hawk and Two-striped Garter Snake as well as a number of plant species such as Ojai fritillary, Bitter gooseberry and Sonoran maiden fern.

However, Staff does recognize that many parcels along Mission Creek have already been developed within close proximity to Mission Creek. Therefore, Staff recommends the following approach to achieving the greatest development distance from creeks possible:

Comment 9: Steelhead Trout Protection through Environmentally Sensitive Habitat (ESH) mapping and standards.

The Environmentally Sensitive Habitat map on page 90 needs to be expanded to include any land within 50 linear feet of Mission or Rattlesnake Creek. It appears there are about 16 parcels not designated as ESH in the Plan Area which are likely to be within 50' of either Rattlesnake or Mission Creeks. Included in the 16 parcel is a Santa Barbara Botanical Gardens parcel. Although there may currently be significant native vegetation in some of the parcels immediately adjacent to the creek, the need for creek water quality protection in these areas for potential Steelhead trout use is high. By having 50' of ESH designated on either side of Rattlesnake and Mission Creeks, new structures and additions to existing structures would be directed away from the Creek. This would allow opportunities for native vegetation enhancement and protection from potential erosion were development activities to occur, both of which are key to maintaining water quality. Even bluff top ESH designation within 50' of the creek is important so that development would not occur too close to the bluff edge, causing potential erosion.

Development Standard BIO-MC-1.9: Clarify that projects meeting the criteria listed Item 3 are subject to the provisions of Item 2.

On page 100, revise as follows, ~~strike-out~~ = delete text and underline = new text.

DevStd. BIO-MC-6.1: The native riparian buffer shall be indicated on all site and grading plans. All ground disturbance and vegetation removal, including fire vegetation clearance

activities, shall be minimized in the buffer area to the maximum extent feasible, except for appropriate vegetation fuel management and required defensible space for existing development and public trails that would not adversely affect existing habitat.

Comment 10: Steelhead Trout Protection from Dams. Revise BIO-MC-6.3 regarding dams as shown below.

BIO-MC-6.3: No structures shall be located within a stream corridor except: public trails that would not adversely affect existing habitat, ~~dams necessary for flood control projects where no other method for protecting existing structures in the floodplain 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. All development shall incorporate the best mitigation measures feasible to minimize the negative impact to the greatest extent. Dams shall not be allowed in the natural stream corridor for any purpose. In stream structures (of ungrouted riprap or weirs) to reduce creek bed or bank erosion may be installed for protection of existing development but only if these structures do not preclude the upstream/downstream passage of trout or other aquatic species, and appropriate permits are obtained.

Related Minor Suggestions

The following are additional suggestions from the City's Creeks Division.

- The Plan should include Defensible Space Requirements and High Fire Hazard Guidelines. These requirements and guidelines should have a section with special requirements for vegetation management adjacent to creeks and tributaries, which protect sensitive biological and water quality resources.
- Page 99, add this text to BIO-MC-2.1: "Use of native fire resistant species shall be encouraged."
- Page 100, add this text to BIO-MC-5: "Natural stream channels shall be maintained in an undisturbed state to the maximum extent feasible in order to protect water quality and..."
- Page 100, BIO-MC-6.2: "...obtained from seed and rootstock within as close proximity to the site as feasible shall be required. Native seed and rootstock should come from as close as possible to the site within the Mission Creek Watershed or, if not available, from within the South Coast (Gaviota Creek to Rincon Creek) in order to protect local native plant genetics."
- Page 101, BIO-MC-7.1: Add: "Development shall not be allowed to fill or pipe ephemeral or intermittent creeks/tributaries and all development adjacent to ephemeral or intermittent stream/creeks shall have a minimum setback of 25 feet."

- Page 118, GEO-MC-2.1: Add: “Natural drainage courses shall not be filled or piped.”
- Include a discussion of the National Pollutant Discharge Elimination System/Storm Water Management Plan in either the regulatory setting or the water quality setting.

Design Guidelines:

- As part of the “Green Design” section of the Design Guidelines on page 30, include low impact development techniques for storing and treating runoff from roofs and driveways.
- **Watershed Management Guidelines**, p. 25, following are some suggested revisions:

Add underlined words to the first paragraph: “Impacts from development occur from increased runoff rates and volumes which damage creek beds and riparian areas as well as pollutants from storm water runoff, such as bacteria, sediments,...”

3.12 “Use permeable paving materials for driveways, walkways and patios where feasible and preserve open space drainage ways.”

3.15 Add: “Direct roof downspouts to landscaping or other pervious areas.”

3.17 Add: “Preserve and restore riparian areas and open space drainage areas.”

E. GRADING & RETAINING WALLS

Retaining Wall Heights, Item 6.05, page 49.

Comment 11: Incorporating the quantitative guidelines for minimizing retaining wall heights in the SFDG pages 56 through 60 is recommended.

Hillside Housing Grading Guidelines, page 50. The Area Plan on pages 118 through 119 prohibits certain types of developments on slopes over 20% and 30%. Staff has found, however, that some applicants will propose inordinate amounts of grading on gently sloping lots. For example, some relatively flat lots can be proposed to be “built up” with excessive cubic yards of grading to afford a greater view for property owners. The City has an interest in minimizing grading truck trips into the Canyon Area as repeated heavy vehicle use can accelerate the degradation of roads leading into the area. Excessive grading can also pose risks associated with degraded creek water quality as well as air quality issues. Depending on the site plan, some areas of the canyon are visible from the City and there can be aesthetic concerns with significant alteration of hillside areas as viewed from the City.

Comment 12: Staff suggests further guidance to property owners regarding reasonable versus unreasonable amounts of grading for a single family home development be included in the Design Guidelines. Incorporation of the quantitative guidelines in the City’s SFDG page 52, (in Attachment D) is recommended. The guidelines suggest less than 250 cubic yards of grading outside the main building footprint for most reasonably sized developments and also

states that most projects rarely need to approach 500 cubic yards of grading outside the main building footprint.

VI. MINOR ISSUES

Along with major comments 1 – 12, Staff recommends the Planning Commission formally recommend the following list of minor comments 13 – 20 continue to be worked on by County and City staff through the environmental review process and revised drafts of the Plan. Minor comments address the need for further water conservation standards, the need for better provisions for neighborhood compatibility and noise regulation consistency between adjacent City and County residences, the need for more specific grading and retaining wall guidelines and other minor environmental topics. Minor suggestions which relate to minor issue topics are also listed in this report section. Where specific wording changes are suggested to the Plan or Guidelines, underlining indicates suggested new text and ~~strike-out~~ indicates text suggested for deletion.

A. WATER

The City's water service area includes Mission Canyon pursuant to a 1912 agreement. Virtually all existing residences in the area are customers of the City water system. New development would also be expected to be served by the City.

Comment 13: Because it is the City's responsibility to serve the Mission Canyon area, it is appropriate for City water conservation standards to apply. On the South Coast, approximately 50% of water is used for landscape irrigation. Accordingly, the Water Resources Division recommends that the updated Mission Canyon Specific Plan include provisions for new development to comply with the City's Landscape Design Standards for Water Conservation, as well as any other standards that may be developed from time to time that exceed otherwise applicable standards for water use efficiency. For example, the City Landscape Design Standards for Water Conservation currently require residential properties undergoing Design Review to have landscape plans with at least 80% "water wise" landscaped area, water conserving irrigation systems and two inches of mulch for planted areas. Please note that the current standards are in the process of being updated. The City's Ordinance Committee plans to review a proposed Ordinance amending the Santa Barbara Municipal Code Landscape Design Standards for Water Conservation this summer.

B. NEIGHBORHOOD COMPATIBILITY ISSUES

Compatibility with Nearby City Residential Neighborhoods. The City has concern that properties less than 15,000 square feet are not proposed to have maximum home sizes, consistent with City standards. Staff has seen that County homes near the Marina Drive neighborhood and other neighborhoods can be significantly larger than City properties in the same neighborhood. The disparity in home size range between jurisdictions can create compatibility issues within areas which function as neighborhoods even though they may be split by a City/County boundary. This issue is often highlighted in the City's practice of using a "20 closest homes analysis" to give background information to City hearing bodies for

purposes of determining appropriate size for a subject property. Unfortunately, City applicants often propose to mimic nearby oversized homes in the County.

Comment 14: Staff would prefer that floor to lot area ratios (FARs) be considered at least as guidelines and preferably as standards for parcels that are in proximity to City residential parcels. An excerpt from the City's Single Family Design Guidelines (SFDG), includes a table of example FAR requirements and guidelines in Attachment D.

Second Stories, page 36 of the Design Guidelines.

Comment 15: Aside from standard height issues, Staff would encourage the County to address the issue of "apparent height" and "horizontal run" of structures in hillside areas and provide numerical guidelines in relationship to these issues (see pages 47 – 51 in the SFDG). (in Attachment D).

Quality Architectural Materials, page 41 or 42 of the Design Guidelines.

Comment 16: On February 4th, the City's Single Family Design Board (SFDB) commented that quality windows need to be specified in the Design Guidelines to avoid vinyl or fiberglass on new structures, as applicants often need guidance to select quality materials. The City's Single Family Design Guidelines include a general guideline for overall architectural quality on page 25 "11.2 Architectural style expressed through building materials, colors, design, exterior treatment, roof articulation and overall design in construction should be of good quality and durable exterior materials. Typical architectural enhancements include: High quality construction and materials for exterior finishes, wood windows, recesses, articulation of openings, wood shutters and ornamental work..." A similar over-arching statement is needed somewhere in the Mission Canyon Design Guidelines to state a preference for quality exterior materials, including quality windows. Consistent quality materials use would help ensure neighborhood compatibility where City and County properties are in the same "neighborhood", even if in different jurisdictions.

Related Minor Suggestion

Listing the Plan area height limit as background information on page 36 may be helpful.

C. NOISE REGULATIONS

DevStd LU-MC-3.1 Noise: The City has a stricter requirement regarding noise levels that can be present at residential property lines. Santa Barbara City MC Code 9.16.025.C requires that mechanical equipment shall not exceed 60 dB(A) CNEL noise level at property lines in residential zones.

Comment 17: Stricter noise requirements are suggested for the Canyon given that City residential properties abut properties in the Plan Area. Also, City residents and tourists benefit from nature-related recreational opportunities in the area. A quiet ambience would create a more favorable environment for community recreation.

D. OTHER ENVIRONMENTAL ISSUES.

In regional cooperation towards water conservation, air quality, climate protection and Million Solar Roof program goals, staff also suggests the following be added to the Guidelines.

- **Invasive Plant Species List.** The table of “Native Alternatives to Exotics” for tree, shrub and grass species included in the appendices of the Plan and Guidelines appears to be a valuable planning resource. The City has included a recently updated California Invasive Plant Council list of invasive plants, with an additional local expert plants of concern list of plants to avoid in both the City’s Single Family Design Guidelines and Architectural Board of Review Guidelines (Appendix E).

Comment 18: In addition to the valuable table of native alternatives to exotics, the County may wish to consider including the Cal IPC list of invasive plants to avoid, which includes a more comprehensive list of invasive plants.

- **Built Green Program.** The City requires the Santa Barbara Built Green program be incorporated at the two-star level for projects involving new structures and additions which will result in over 4,000 net square feet. This requirement is suggested for Mission Canyon, especially considering the potential site conservation and corresponding water quality improvements which could result. Although the County’s Innovative Building Review Program (IBRP) is commendable, the focus of the program appears to be on energy conservation with some deference given to other green building topics. In contrast, the Built Green Program provides education and comprehensive point systems for not only energy conservation topics, but also site and water, indoor air quality and materials efficiency. In addition, the IBRP program is purely voluntary.

Comment 19: An ideal solution would appear to be to continue the IBRP program and also incorporate the Built Green program into the planning process for some projects.

- **Million Solar Roofs Program.** The City has adopted Solar Energy System Design Guidelines to encourage aesthetically compatible solar design. An important component is to “preplan” for future solar installation whenever major additions or new home construction occurs. If active solar is not included in the design, then setting aside space for a future solar energy system is helpful to avoid needing to “piece around” roof-top equipment.

Comment 20: The City suggests a guideline for setting aside areas on rooftops for future active solar use where feasible. The more aesthetically integrated solar energy systems can be, it is the City’s belief, the more prolific they will become, consistent with Million Solar Roofs Program goals. Refer to the City’s SFDG page 9, (in Attachment D) which suggest approximately 300 square feet of roof space be set aside for solar panels on major additions or new homes.

VII. COMPLIANCE WITH THE GENERAL PLAN

A full analysis of the proposed plan’s consistency with the City of Santa Barbara’s General Plan will be performed after the environmental review phase of the project is complete.

Preliminarily, it appears that greater consistency with the City's Conservation and Land Use Elements could be achieved through the Plan in areas of Fire Safety, Biological Resource Protection, Transportation Safety, Visual Resource Protection, Water Conservation and Noise. , Consistency between the Mission Canyon Community Plan and the City of Santa Barbara General Plan is desirable, but is not required for adoption.

VIII. CONCLUSION

The proposed Mission Canyon Community Plan would provide further protections and improvements over the existing regulatory system in the area. The City supports many of the proposals in the Plan, including the elimination of second unit allowances in the Plan area, wastewater development standards and actions, the Mission Canyon Scenic Corridor, and other items. However, the City would like to continue to work together with the County to further address Fire Safety, Transportation, Land Use Build Out, Neighborhood Compatibility and Federally Endangered Steelhead Trout protection and other issues. As the water purveyor for Mission Canyon, the City would also appreciate landscape water conservation standards which are applied in the City to also be applied in Mission Canyon.

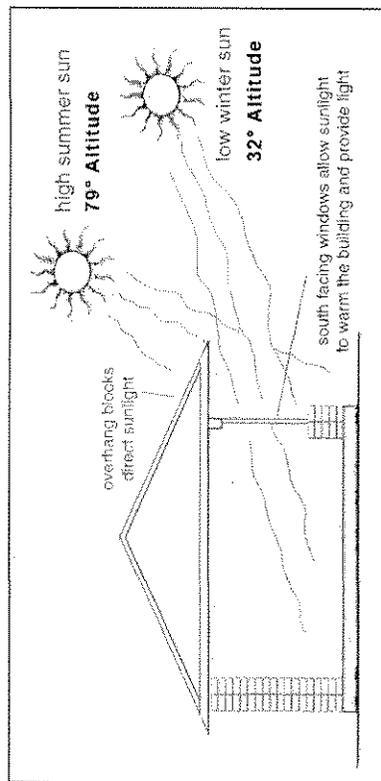
Exhibits:

- A. County Planning Commission Staff Report (May, 2008)
http://www.santabarbaraca.gov/Resident/Major_Planning_Efforts/Mission_Canyon
- B. Mission Canyon Initiation Draft Community Plan (May, 2008)
http://www.santabarbaraca.gov/Resident/Major_Planning_Efforts/Mission_Canyon
- C. Mission Canyon Initiation Draft Residential Design Guidelines (May, 2008)
http://www.santabarbaraca.gov/Resident/Major_Planning_Efforts/Mission_Canyon
- D. City of Santa Barbara Single Family Design Guidelines Excerpts, pages 9, 20, 47-53, 56-60.
- E. Invasive Plant Species List, excerpted from the City of Santa Barbara Single Family Design Board Guidelines.

Passive Solar Design

Buildings with passive solar building designs use the sun for free heating, cooling and lighting. Passive solar design includes carefully orienting building walls, windows and roof details on a site in response to sun patterns for energy conservation and a naturally more comfortable home environment. For more information about Passive Solar design principles, see the City of Santa Barbara's "Passive Solar Building Design Guidelines and Recognition Program."

Generous roof overhangs provide a quality appearance for structures (when appropriate to the structure) and can assist with seasonal heating and cooling. However, overly extended overhangs can create a bulky appearing structure.



This drawing shows a home that uses passive solar heating principles. In the summer, the overhang blocks the warm sun. In the winter, south-facing windows allow sunlight for warmth.

Active Solar Design

Solar energy systems such as photovoltaic electricity-producing solar panels and hot water solar thermal systems are encouraged as an environmentally superior alternative to energy sources such as fossil fuels. Active solar energy solar systems can also save homeowners money over time. Even if a homeowner does not choose to include an active solar energy system in a project design when a new home or addition is first planned, simple considerations can make installing such systems later much easier and more attractive. Consider leaving a 300' square-foot rectangular area of roof space free of mechanical equipment and vents facing south, west or east. The area could then easily accommodate a regularly shaped, sufficiently sized solar energy system in the future. Or, consider a parapet-style roof system which could hide a future solar energy system.

For more information about designing solar energy systems to be both highly efficient and compatible with a neighborhood, please see the City's "Solar Energy System Design Guidelines and Recognition Program," available at 630 Garden Street.



A "carefully designed & mounted panel solar energy system."

APPLICABILITY

Maximum FARs as requirements apply to a home taller than one story and a basement on lots smaller than 15,000 square feet in size in single-family zones. The maximum requirements also apply to homes taller than 17' from natural or finished grade, whichever is lower on lots smaller than 15,000 square feet in single-family zones. Other properties, such as those 15,000 square foot lots or larger, or properties in multi-family zones, the FARs are applied as guidelines, rather than requirements.

The only way to exceed a required maximum FAR for most projects would be to request a "Planning Commission Modification" (see page 21-C for exception). However, for any project, no matter the location or height, a review board can request a smaller size if it is necessary in order for an approval to be made, for example to ensure the NPO Findings on page 5-D or other findings on page 6-D can be made.

Table 1: Formula Table

Lot Size in Sq. Ft	Range	Max. Home Size (in sq. ft.) incl. garage/carport
≤ 4000 sq. ft.		2200
4000 - 10000 sq. ft.		1200 + (0.25 x lot size)
10000 - 14999 sq. ft.		2500 + (0.125 x lot size)
15000 - 19999 sq. ft.		4180 + (0.013 x lot size)
≥ 20000 sq. ft.		4430 + (0.013 x lot size)

*Garage/Carport Allowance	
Lot Size	Allowance
< 20000	500
> 20000	750*
≥ 20000	750*

*Where zone district allows, see Municipal Code 28.87.160.4

**Garage/carport allowance does not need to be used only for garage/carport space for maximum square footage calculations. Max. sq. ft. can be distributed anywhere if consistent with Zoning regulations. Ex.: two-car covered parking minimum space requirement is 400 sq. ft. and 100 sq. ft. of remaining "allowance" could be used in the home instead of in the garage/carport.

Table 2: Example FAR Calculations Table

Lot Size	Proposal			
	100% Maximum Home Size excluding garage/carport	Maximum Home Size excluding garage/carport allowance **	85% of Max. Home Size incl. garage/carport	Maximum FAR including garage/carport
4000	2200	1700	1870	0.55
5000	2450	1950	2083	0.49
6000	2700	2200	2295	0.45
7000	2950	2450	2508	0.42
7499	3075	2575	2614	0.41
7500	3075	2575	2614	0.41
8000	3200	2700	2720	0.40
9000	3450	2950	2933	0.38
10000	3750	3250	3188	0.38
11000	3875	3375	3294	0.35
12000	4000	3500	3400	0.33
13000	4125	3625	3506	0.32
14000	4250	3750	3613	0.30
14999	4375	3875	3719	0.29

15000	4375	3875	3719	0.29
20000	4690	3940	3987	0.23
1/2 acre	4713	3963	4006	0.22
3/4 acres	4855	4105	4127	0.15
1 acre	4996	4246	4247	0.11
1.5 acres	5279	4529	4488	0.08
2 acres	5563	4813	4728	0.06
2.5 acres	5846	5096	4969	0.05
3 acres	6129	5379	5210	0.05
3.5 acres	6412	5662	5450	0.04
4 acres	6695	5945	5691	0.04
4.5 acres	6978	6228	5932	0.04
5 acres	7261	6511	6172	0.03
5.5 acres	7545	6795	6413	0.03
6 acres	7828	7078	6654	0.03

REQUIRED

GUIDELINES ONLY

28. APPARENT HEIGHT

Structures should have a modest “apparent height” (lowest point of contact with grade to highest point of building dimension).

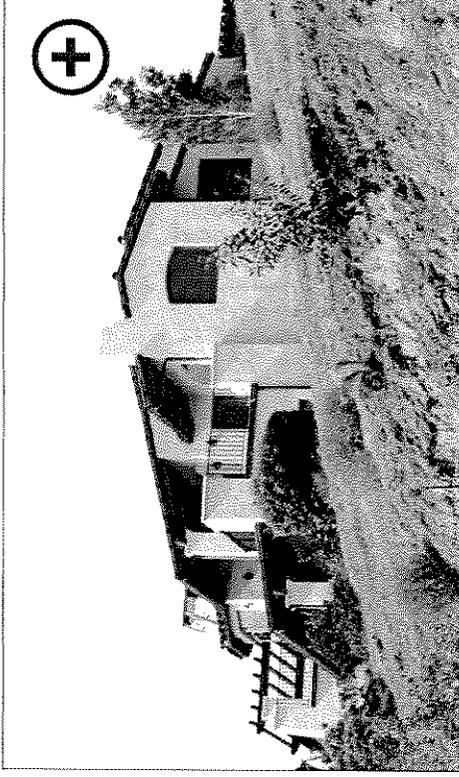
- 28.1 Homes with an apparent height less than 30’ are preferable. Design review boards will carefully consider appropriateness of homes exceeding an apparent height of 30’.
- 28.2 Although the Municipal Code height limit is 30’ in single family residential zones, appropriate hillside project proposals usually have a height of 25’ or less, especially where the slope is less than 25%.
- 28.3 Retaining walls which create a grade higher than natural grade underneath a residence contribute to a structure’s apparent height.
- 28.4 Homes with a total run of less than 60’ in horizontal distance for combined steps are preferred.
- 28.5 More spilldown is appropriate on very steep lots to minimize grading than would be appropriate on moderately steep or gently sloping lots.

Two elevations are shown for three home scenario examples on the same site on pgs. 46-49.

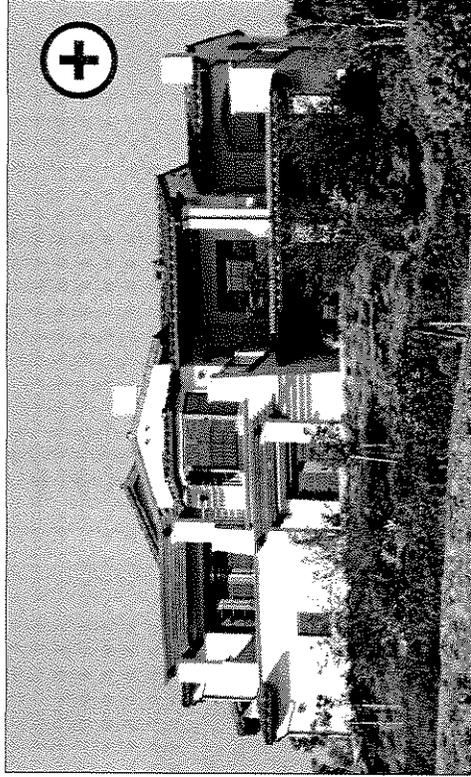
Ex. 1: Two-story home cut into the hillside, consistent with 28, 28.1, 28.2, & 28.4 above.

Ex. 2: Three-story home cut into the hillside, inconsistent with 28, 28.1, 28.2 & 28.4 above.

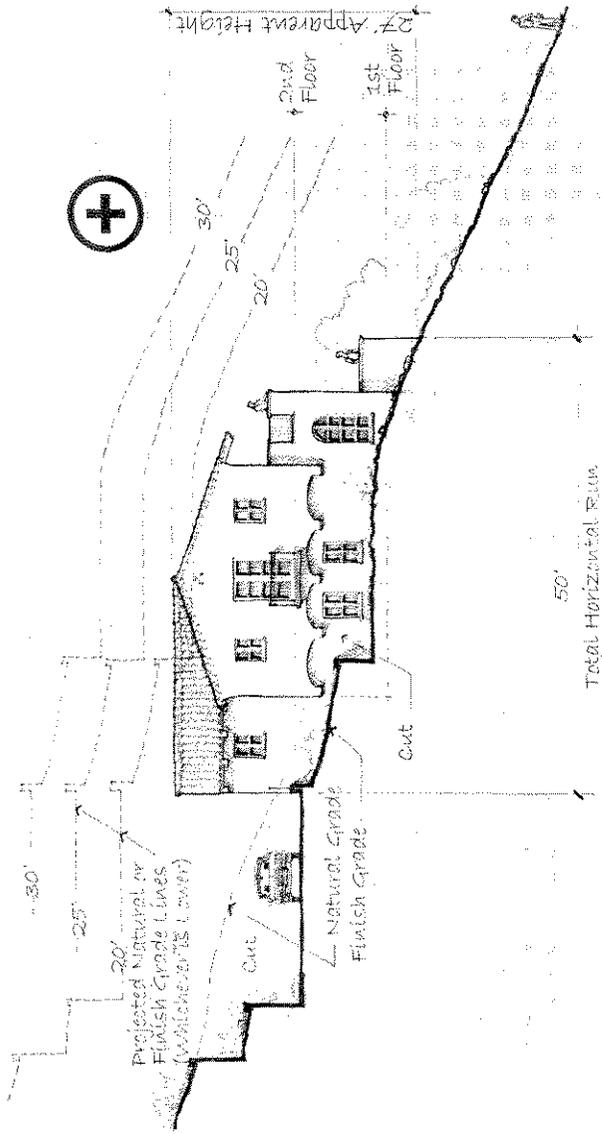
Ex. 3: Three-story home not significantly cut into the hillside, extremely inconsistent with 28, 28.1, 28.2, & 28.4 above.



A home in the Alta Vista neighborhood is set into hillside to create a “low profile”. (27.2, 27.3, 27.4, 28.1, 28.2)

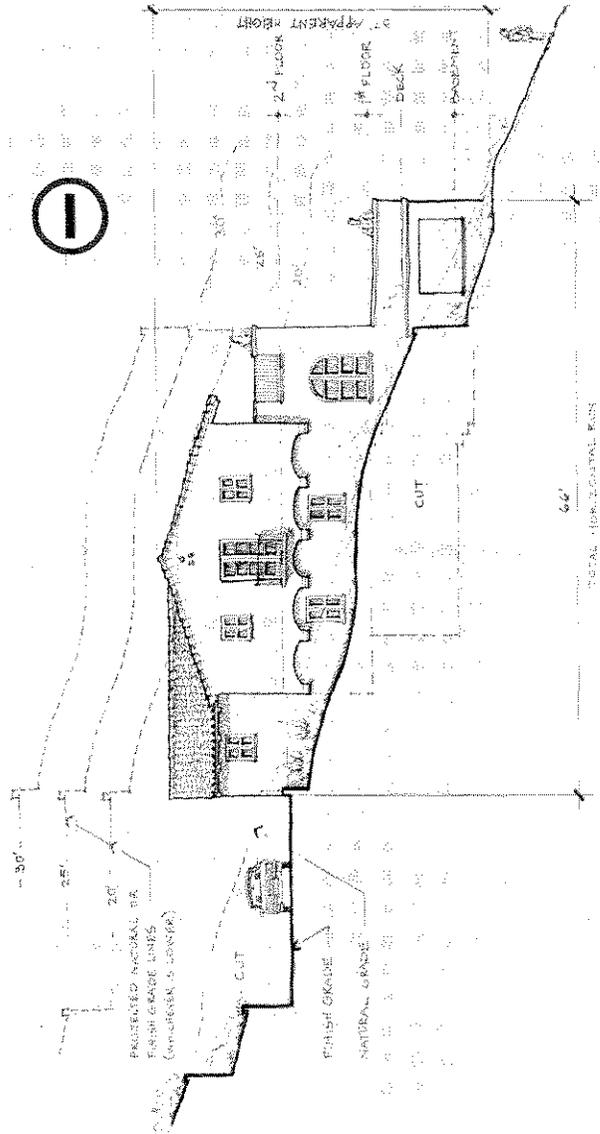


The same Alta Vista neighborhood home viewed from the front of the house. Setting the house into the hillside reduces the apparent height. (27.1, 28.1, 28.2)



**EXAMPLE 1 - APPARENT HEIGHT 27'
SIDE ELEVATION SITE SECTION VIEW**

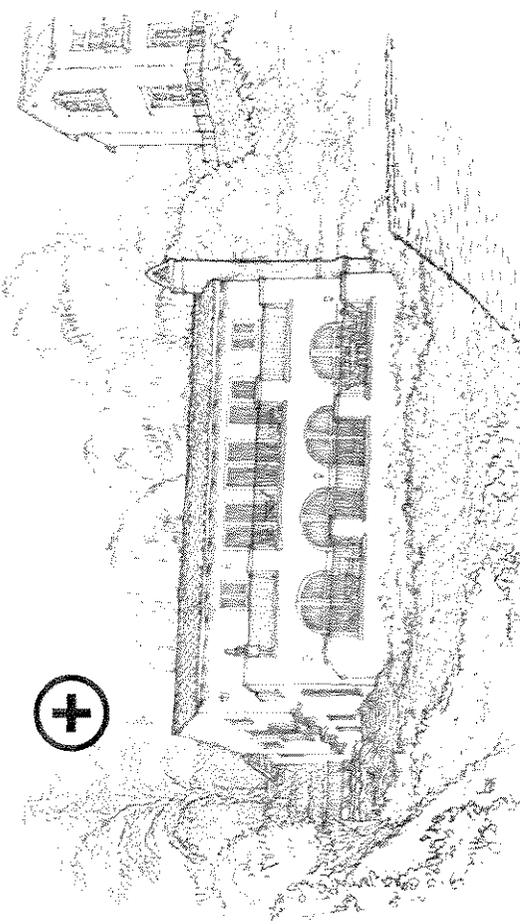
- Modest horizontal downhill run.
- Limited to 2 stories.
- Lower floor cut into hillside helps reduce apparent height.



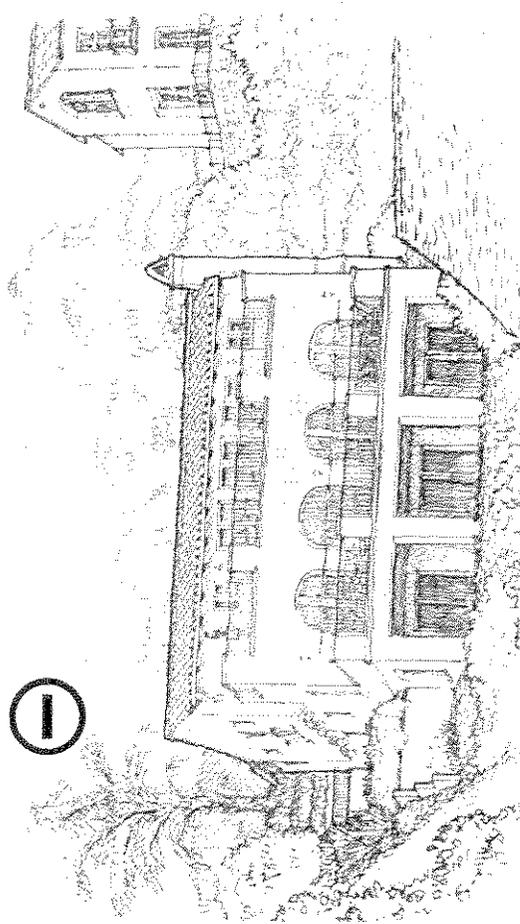
**EXAMPLE 2 - APPARENT HEIGHT 37'
SIDE ELEVATION SITE SECTION VIEW**

- Significant horizontal downhill run.
- Significant cut into hillside does not adequately reduce apparent height, as number of stories and horizontal run are too aggressive.
- All 3 stories are fully apparent for full width of structure on the downhill side.

Hillside Housing Guideline #28 (cont'd) Structures should have a modest apparent height



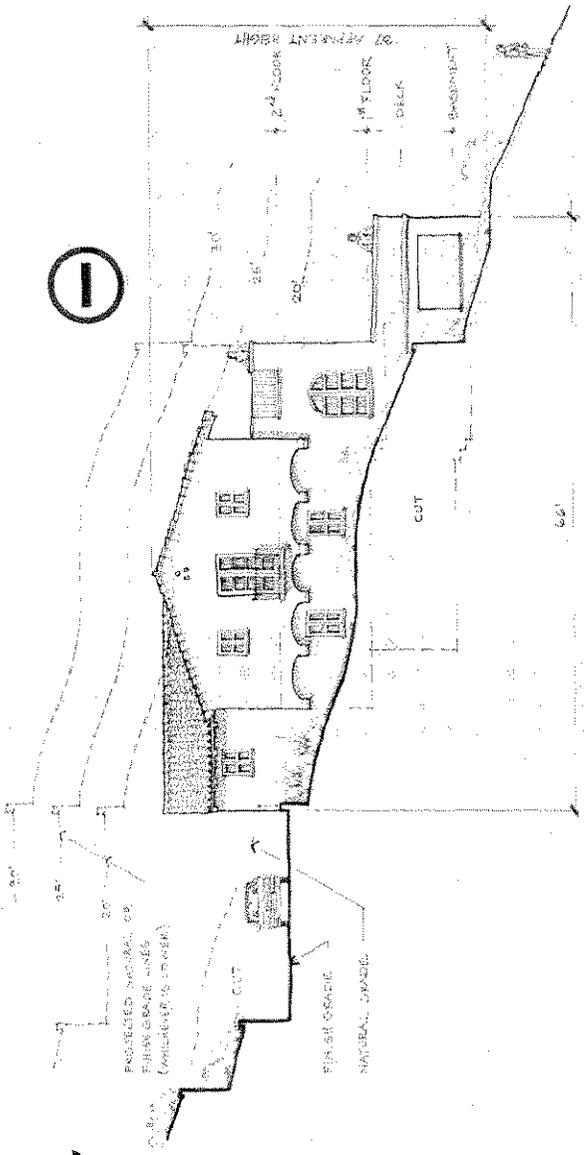
EXAMPLE 1 - APPARENT HEIGHT 27'
DOWNHILL ELEVATION VIEW



EXAMPLE 2 - APPARENT HEIGHT 37'
DOWNHILL ELEVATION VIEW

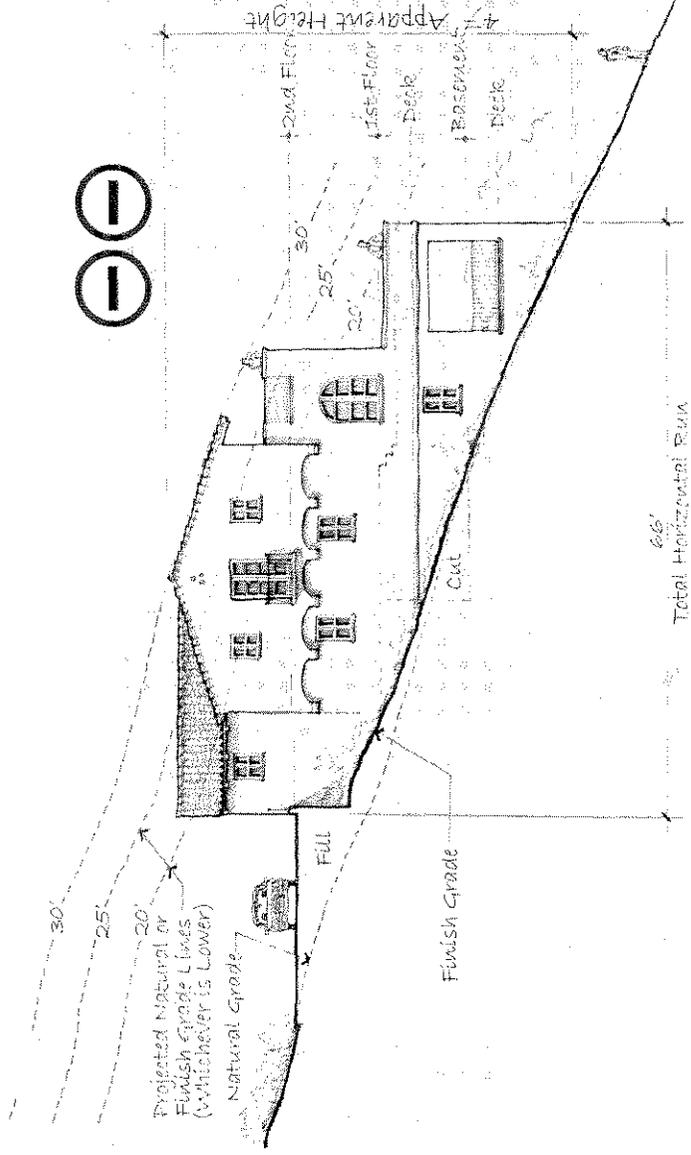
EXAMPLE 2 (REPEATED) - APPARENT HEIGHT 37'
SIDE ELEVATION SITE SECTION VIEW

- Significant horizontal downhill run.
- Significant cut into hillside does not adequately reduce apparent height, as number of stories and horizontal run are too aggressive.
- All 3 stories are fully apparent for full width of structure on the downhill side.

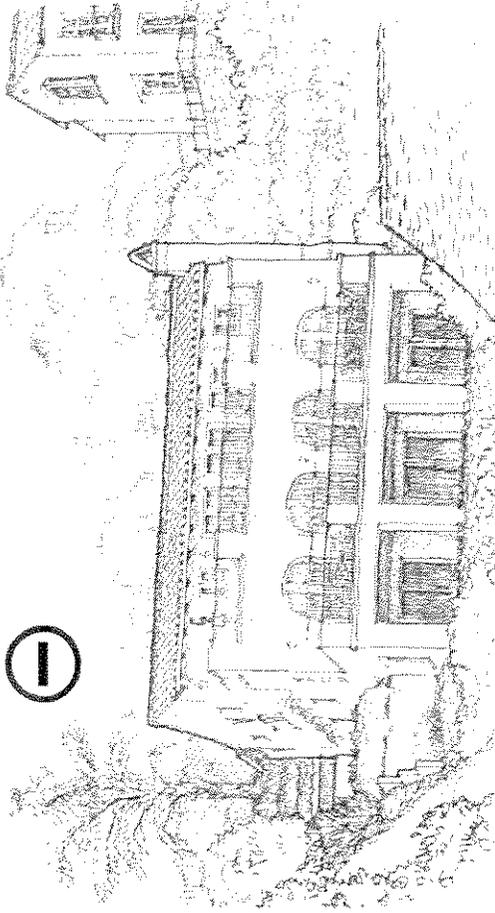


EXAMPLE 3 - APPARENT HEIGHT 47'
SIDE ELEVATION SITE SECTION VIEW

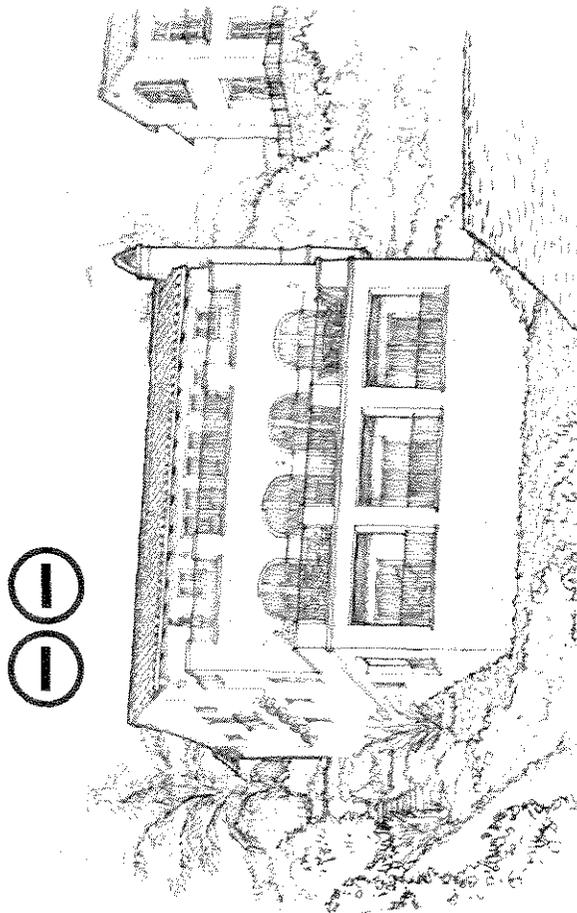
- Horizontal downhill run is too long.
- Too many stories.
- No cut into hillside to minimize apparent height, especially along side elevations
- All 3 stories are fully apparent for full width of structure on the downhill side.



Hillside Housing Guideline #28 (cont'd) Structures should have a modest apparent height



EXAMPLE 2 (REPEATED) - APPARENT HEIGHT 37'
DOWNHILL ELEVATION VIEW



EXAMPLE 3 - APPARENT HEIGHT 47'
DOWNHILL ELEVATION VIEW

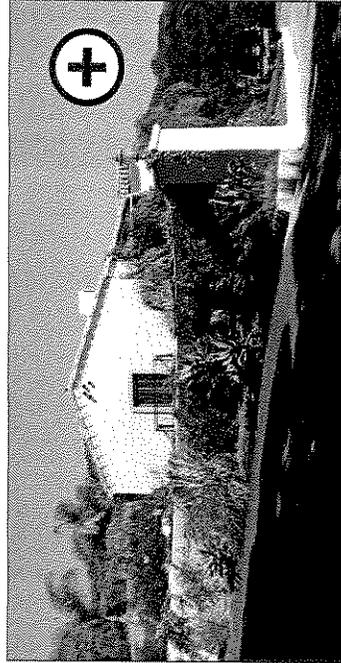
29. GRADING

Limit the amount of grading to avoid erosion, visual, and other impacts.

29.1 Carefully plan your project to minimize grading both underneath the main building footprint and on the entire site. Most reasonably sized development projects should be able to achieve a project program with less than 250 cubic yards of grading on a property. Only rarely do projects need to approach 500 cubic yards of grading, not including grading under the building footprint, to achieve reasonable development of a property.

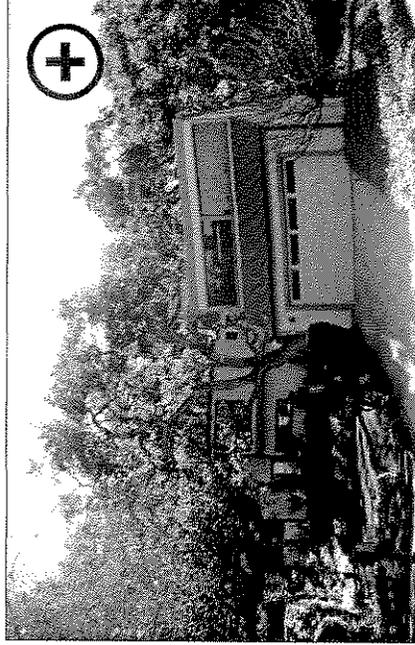
29.2 Preserve slopes greater than 30% by avoiding grading and clearing.

29.3 Avoid visual scarring.



The project follows natural contours, minimizing grading. (26.2, 29.1). Landscape "softens" lower exterior or retaining walls (26.7). The structure has low profile and limited stories (27.3, 27.2, 31.1). The structure is cut into the slope (29.5). The driveway follows natural contours (30.2, 30.4).

- 29.4 Retaining walls should be incorporated under the house.
- 29.5 Minimize the visual impact of grading by doing most of the cut under the buildings.
- 29.6 Attempt to balance cut and fill on site, while recognizing that export may be necessary to preserve the natural topography.
- 29.7 Excess materials may be used elsewhere on the site if the grading results in minimum changes to the natural contours and will not be distinguished from surroundings within a short period of time.
- 29.8 Man-made contours should mimic natural contours.
- 29.9 Avoid hiding downhill foundations with fill.

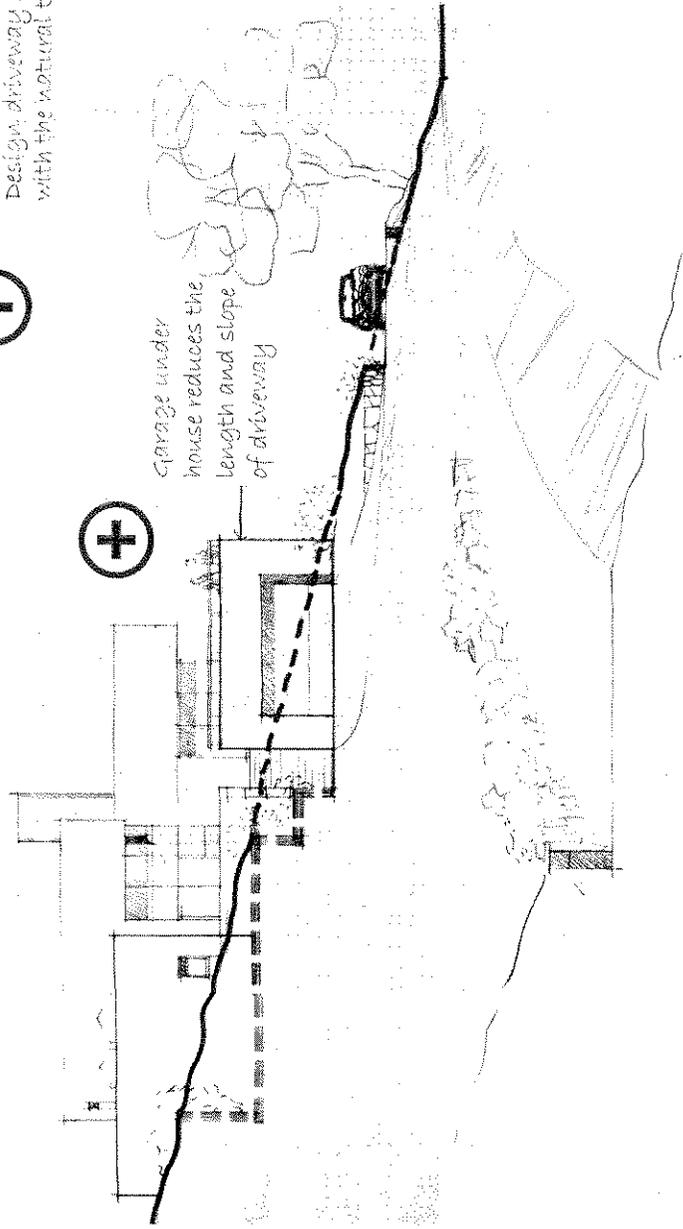
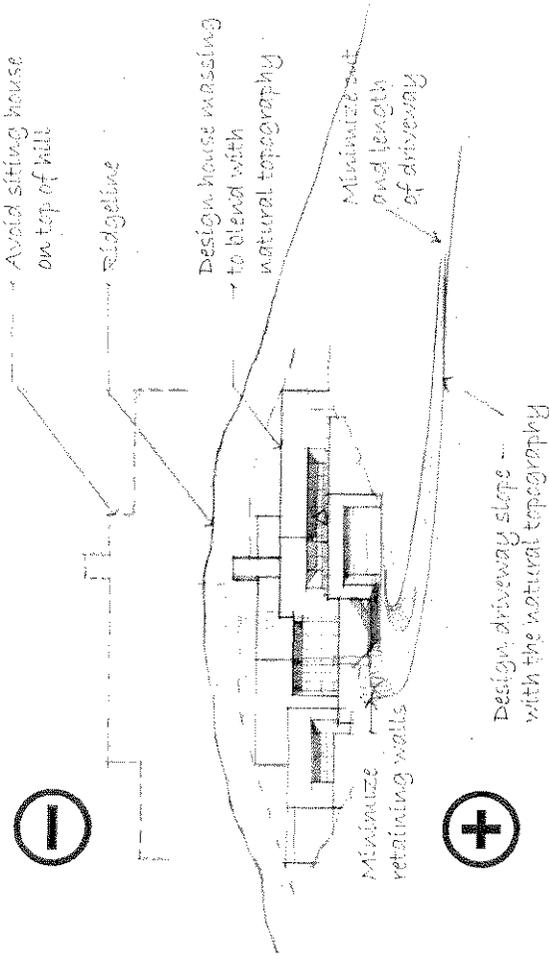


Stepped building placement works with the contours and minimizes grading (26.5, 29.1). Natural landscaping blends the structure into the surroundings. (26.7). The higher portion of the project is set back further from the street. (27.1). Build contours are natural looking (29.8). Garage is near the street to maintain a short driveway. (30.1) Structure has varied rooflines (31.1). The project is of modest scale (32.1).

30. GRADING FOR DRIVEWAYS

Minimize and mitigate visual effects of grading for driveway purposes.

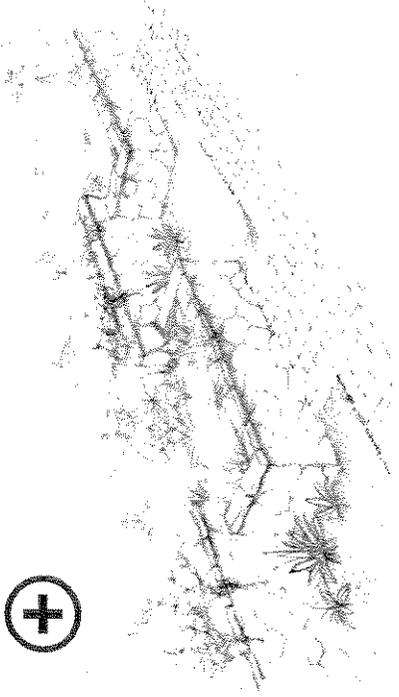
- 30.1 Set house on the site so that the length of the driveway is minimized.
- 30.2 Minimize the visibility of driveway cuts from the property.
- 30.3 Use planting, wall materials, and colors to minimize visual effects of driveway cuts.
- 30.4 Design driveway slope with the natural topography.



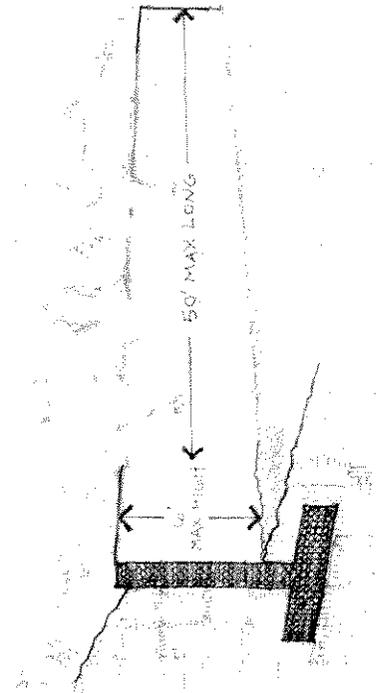
34. RETAINING WALLS

Design retaining walls to blend into their surroundings.

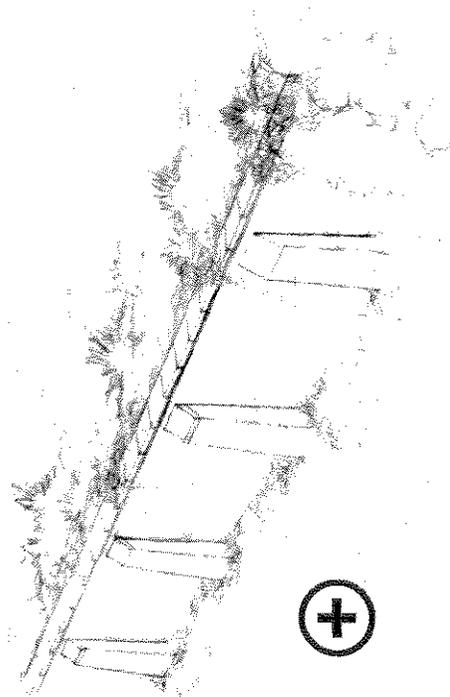
- 34.1 Minimize length of solid fences, landscape walls, and retaining walls on hillsides. Walls should not exceed 50' in length.
- 34.2 Minimize fence and wall heights. An 8' wall may be acceptable if the materials are aesthetically pleasing (for example, stone), but a 6' height limit is more appropriate for materials such as stucco.



Undulating wall

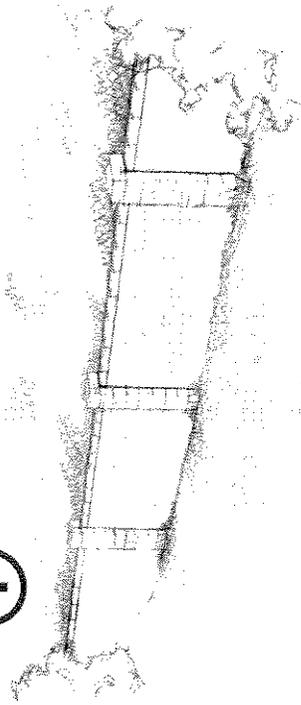


- 34.3 Long, continuous walls may be acceptable if they undulate, are broken up by buttresses or pilasters, and are of appropriate natural materials such as stone or adobe. Plaster walls may be acceptable at the SFDB's discretion.



Buttress Wall

34. RETAINING WALLS CONTINUED.

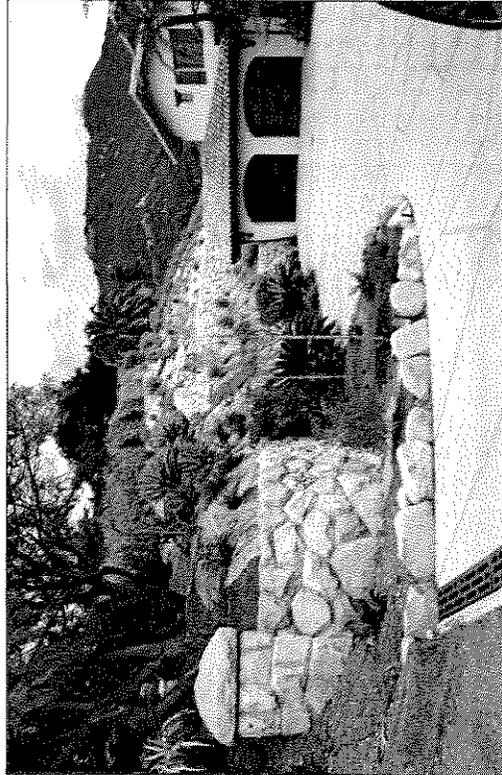


Pilaster wall

- 34.4 Use horizontal lines and proportions to reduce perception of height and bulk.
- 34.5 Follow topography with fence and wall design.
- 34.6 Use earth tone colors that tend to blend with the surrounding natural colors of the hillsides and minimize visual effects. Avoid use of colors contrasting with the surrounding natural terrain such as bright white walls or large areas of bright non-native flowers.
- 34.7 Use stone or other native, natural materials.
- 34.8 Integrate vegetation and landscaping with fence and wall design.
- 34.9 Avoid locating retaining walls near existing walls.
- 34.10 Retaining walls with fill behind them can be particularly visually disruptive.



An example of quality wall design and complementary landscaping in the Cielito neighborhood. (34.7, 34.8, 34.9)



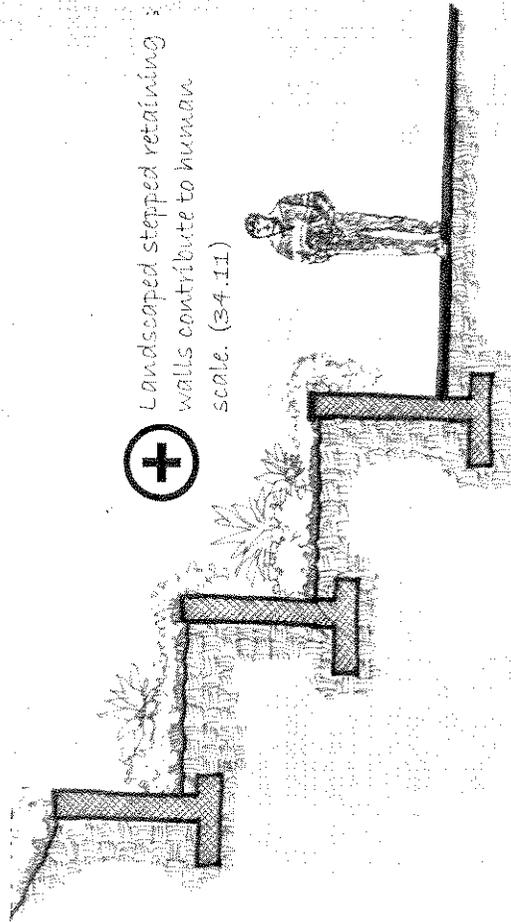
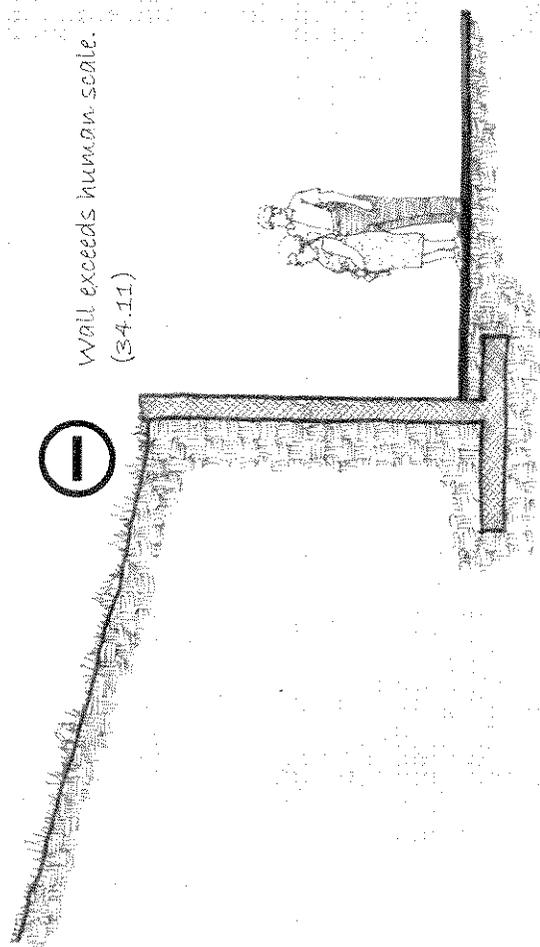
Newly completed terraced retaining walls in the Cielito neighborhood blend well with the surrounding terrain and adjacent home. Landscaping plants also complement the terrain and walls. (34.7, 34.8, 34.9)

34. RETAINING WALLS CONTINUED.

- 34.11 Stepped or terraced retaining walls, with planting in between, may be an acceptable alternative to tall retaining walls.
- 34.12 The minimum distance between two terraced retaining walls should be at least the average height of the two walls.

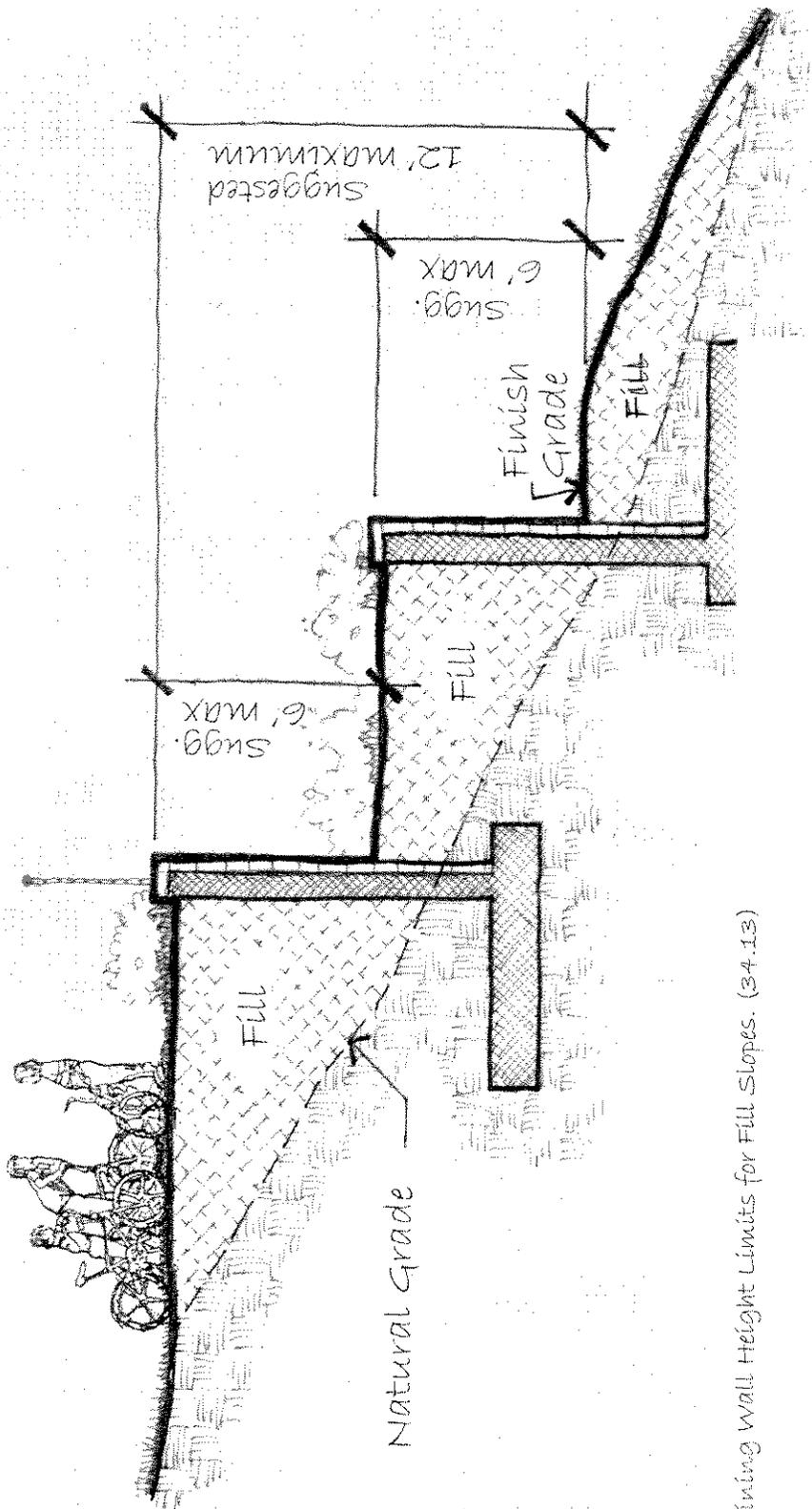


A stepped terrace design avoids creating a tall retaining wall and plantings obscure the short terrace walls in this example on Foothill Road. (34.2, 34.11)



34. RETAINING WALLS CONTINUED.

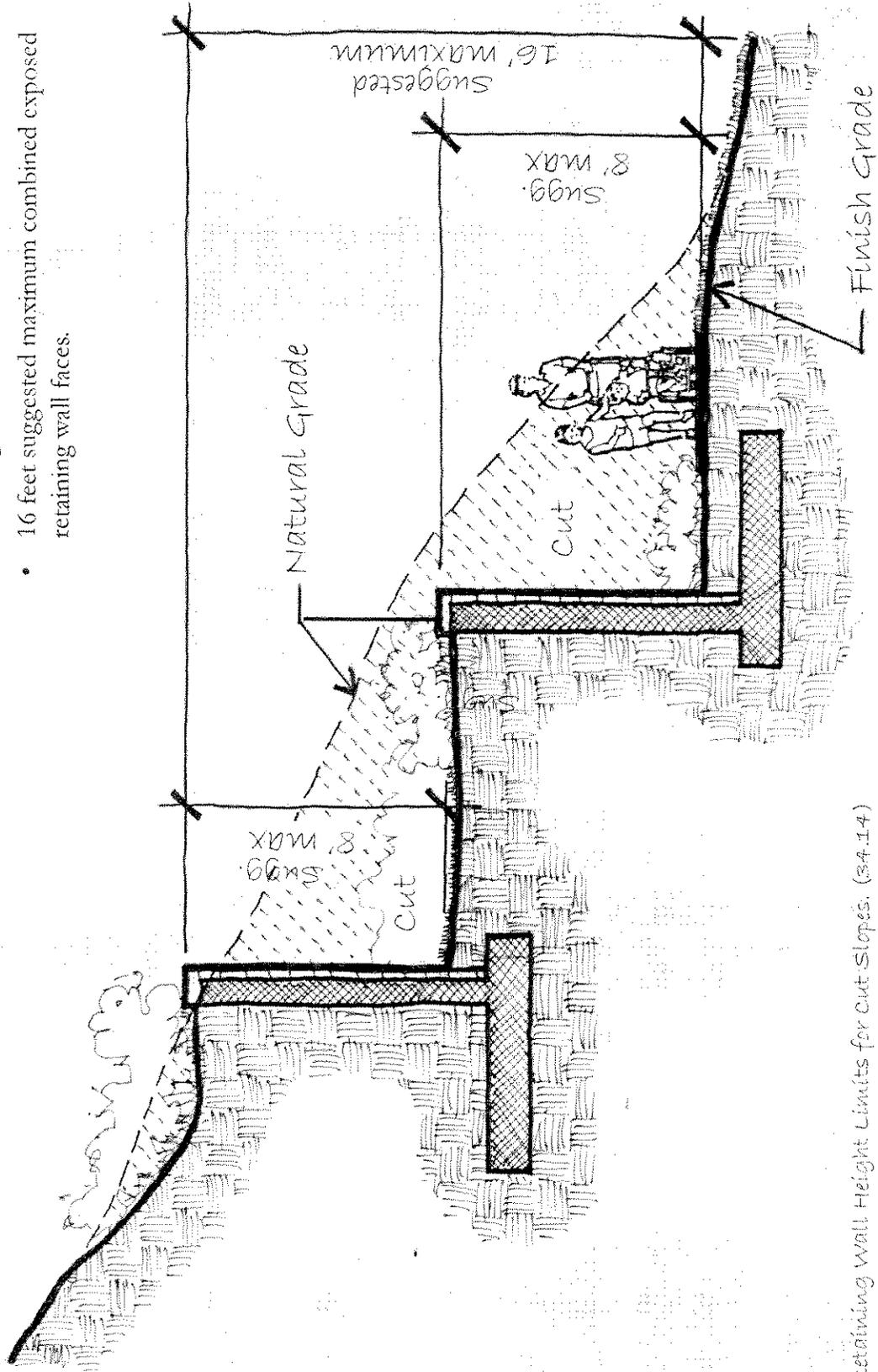
- 34.13 The following are suggested maximum heights for fill slope retaining wall systems:
- 6 feet suggested maximum exposure for individual retaining walls
 - 12 feet suggested maximum combined exposed retaining wall faces.



Retaining Wall Height Limits for Fill Slopes. (34-13)

34. RETAINING WALLS CONTINUED.

- 34.14 The following are suggested maximum heights for cut slope retaining wall systems:
- 8 feet suggested maximum exposure for individual retaining walls.
 - 16 feet suggested maximum combined exposed retaining wall faces.



Retaining Wall Height Limits for Cut Slopes. (34.14)

Cal-IPC List of Exotic Plants of Greatest Ecological Concern in California

The following information has been excerpted from the California Invasive Plant Council (Cal-IPC) website, www.cal-ipc.org, last updated 2/07. Species of concern are sorted alphabetically and “high”, “moderate” and “limited” invasive statuses are listed for each plant. Additional recommendations for local invasive species to avoid according to local plant experts are noted on this list.

Key to plant list:

- Bold** The species has invaded the Southwest California ecological region, in which Santa Barbara is located. For more information, see: www.cal-ipc.org/ip/inventory/pdf/Inventory2006.pdf
- !** “Alert” status has been issued by the Cal-IPC.
-  Local plant experts have expressed concern regarding the invasiveness of this species.
-  Local plant experts have expressed concern regarding the invasiveness of this species near sensitive habitats such as creeks.
- Shaded** Plants typically available for sale

Cal-IPC Invasive Status Definitions

High. These species have severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal and establishment. Most are widely distributed ecologically.

Moderate. These species have substantial and apparent—but generally not severe—ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal, though establishment is generally dependent upon ecological disturbance. Ecological amplitude and distribution may range from limited to widespread.

Limited. These species are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic.

Alert. Specific combinations of section scores that indicate significant potential for invading new ecosystems triggers an Alert designation so that land managers may watch for range expansions.

EXHIBIT E

Plant Species

Invasive Status

<i>Crataegus monogyna</i> (English hawthorn)	Limited
<i>Cynara cardunculus</i> (artichoke thistle)	Moderate
☞ <i>Cynodon dactylon</i> (bermudagrass) – esp. flowering varieties	Moderate
<i>Cynosurus echinatus</i> (hedgehog dogtailgrass)	Moderate
<i>Cytisus scoparius</i> (Scotch broom)	High
<i>Cytisus striatus</i> (Portuguese broom, striated broom)	Moderate
<i>Dactylis glomerata</i> (orchardgrass)	Limited
☞ <i>Delairea odorata</i> (<i>Senecio mikanioides</i>) (Cape-ivy, German-ivy) locally – especially invasive when planted near wildlands	High
<i>Descurainia sophia</i> (flixweed, tansy mustard)	Limited
<i>Dipsacus sativus</i> (fuller's teasel)	Moderate
! <i>Dittrichia graveolens</i> (stinkwort)	Moderate
<i>Echium candicans</i> (pride-of-Madeira)	Limited
<i>Egeria densa</i> (Brazilian egeria)	High
<i>Ehrharta calycina</i> (purple veldtgrass)	High
<i>Ehrharta erecta</i> (erect veldtgrass)	Moderate
! <i>Ehrharta longiflora</i> (long-flowered veldtgrass)	Moderate
! ☞ <i>Eichhornia crassipes</i> (water hyacinth)	High
! <i>Emex spinosa</i> (spiny emex, devil's thorn)	Moderate
<i>Erodium cicutarium</i> (redstem filaree)	Limited
☞ <i>Eucalyptus camaldulensis</i> (red gum)	Limited
☞ <i>Eucalyptus globulus</i> (Tasmanian blue gum)	Moderate
! <i>Euphorbia esula</i> (leafy spurge)	High
! <i>Euphorbia terracina</i> (carnation spurge)	Moderate
<i>Festuca arundinacea</i> (tall fescue)	Moderate
<i>Ficus carica</i> (edible fig)	Moderate
<i>Foeniculum vulgare</i> (fennel)	High
<i>Genista monspessulana</i> (French broom)	High
<i>Geranium dissectum</i> (cutleaf geranium)	Moderate
☞ <i>Hedera helix</i> , <i>H. canariensis</i> (English ivy, Algerian ivy) locally – especially invasive when planted near wildlands	High
<i>Hirschfeldia incana</i> (shortpod mustard, summer mustard)	Moderate
<i>Holcus lanatus</i> (common velvetgrass)	Moderate
<i>Hordeum marinum</i> , <i>H. murinum</i> (Medit. barley, hare barley, wall barley)	Moderate
! <i>Hydrilla verticillata</i> (hydrilla)	High
! <i>Hypericum canariense</i> (Canary Island hypericum)	Moderate
<i>Hypericum perforatum</i> (common St. Johnswort, klamathweed)	Moderate
<i>Hypochaeris glabra</i> (smooth catsear)	Limited
<i>Hypochaeris radicata</i> (rough catsear, hairy dandelion)	Moderate
<i>Iris pseudacorus</i> (yellowflag iris)	Limited
<i>Lepidium latifolium</i> (perennial pepperweed, tall whitetop)	High
<i>Leucanthemum vulgare</i> (oxeye daisy)	Moderate
<i>Linaria genistifolia</i> ssp. <i>dalmatica</i> (<i>L. dalmatica</i>) (Dalmation toadflax)	Moderate
! <i>Linaria vulgaris</i> (Yellow toadflax)	Moderate

Plant Species

Invasive Status

	<i>Salsola tragus</i> (Russian-thistle)	Limited
!	<i>Salvinia molesta</i> (giant salvinia)	Moderate
	<i>Saponaria officinalis</i> (bouncingbet)	Limited
	<i>Schinus molle</i> (Peruvian or California peppertree)	Limited
	<i>Schinus terebinthifolius</i> (Brazilian peppertree)	Limited
	<i>Schismus arabicus</i> , <i>S. barbatus</i> (mediterraneangrass)	Limited
	<i>Senecio jacobaea</i> (tansy ragwort)	Limited
!	<i>Sesbania punicea</i> (red sesbania, scarlet wisteria)	Moderate
	<i>Silybum marianum</i> (blessed milkthistle)	Limited
	<i>Sinapis arvensis</i> (wild mustard, charlock)	Limited
	<i>Sisymbrium irio</i> (London rocket)	Moderate
!	<i>Spartina alterniflora hybrids</i> (smooth cordgrass, Atlantic cordgrass)	Moderate
!	<i>Spartina densiflora</i> (dense-flowered cordgrass)	Moderate
	<i>Spartium junceum</i> (Spanish broom)	Moderate
	<i>Taeniatherum caput-medusae</i> (medusahead)	Moderate
	<i>Tamarix aphylla</i> (athel tamarisk)	Limited
	<i>Tamarix parviflora</i> (smallflower tamarisk)	Moderate
	<i>Tamarix ramosissima</i> (saltcedar, tamarisk)	Moderate
	<i>Torilis arvensis</i> (hedgearsley)	Moderate
	<i>Trifolium hirtum</i> (rose clover)	Moderate
	<i>Ulex europaeus</i> (gorse)	Moderate
	<i>Undaria pinnatifida</i> (wakame)	Limited
☞	<i>Vinca major</i> (big periwinkle)	Moderate
	<i>Vulpia myuros</i> (rattail fescue)	Moderate
!	<i>Washingtonia robusta</i> (Mexican fan palm, Washington palm)	Moderate
	<i>Zantedeschia aethiopica</i> (calla lily)	Limited