

## **1.0 EXECUTIVE SUMMARY**

### **1.1 INTRODUCTION**

The Santa Barbara Botanic Garden has requested approvals from the County of Santa Barbara in connection with its proposed Vital Mission Plan. This plan would modify and expand facilities and uses at the Garden. County of Santa Barbara Planning and Development (P&D) prepared a Draft Environment Impact Report (DEIR) for the project pursuant to requirements of the California Environmental Quality Act (CEQA). The DEIR was circulated for public review from July 4, 2007 through September 7, 2007 and a public hearing was held on July 26, 2007. Comments were received in the form of letters, emails, and public hearing testimony.

Among these were comments regarding the project's Fire Protection Plan (FPP) and the DEIR historic resources evaluation. DEIR mitigation measure FIRE 1-1 required the expansion and amendment of the applicant's FPP. Many commenters requested that the revised FPP be prepared prior to project approval and circulated for public review. In response, the applicant has revised its Fire Protection Plan (FPP) in accordance with DEIR mitigation measure FIRE 1-1. With regard to historic resources, commenters identified the need to evaluate the entirety of the Garden, with particular emphasis on its potential qualification as a historic landscape. In response, the County hired an independent consultant to prepare a Historic Resources Assessment for the entire Botanic Garden property. The revised FPP and Historic Resources Assessment constitute new information and are important in allowing for meaningful public review of the project's significant impacts and mitigation of those impacts. Therefore, in accordance with CEQA Guidelines Section 15088.5, this DEIR Recirculation Document has been prepared in order to allow for public review of those sections of the DEIR that have substantially changed as a result of this new information. These are Section 4.4 Cultural Resources and Section 4.5 Fire Protection.

In addition, the applicant has modified its project to improve its layout and design in response to several hearings before the South County Board of Architectural Review as well as to reduce its environmental impacts and ensure policy consistency in response to comments on the DEIR. These changes are presented herein for the public's information since the revised DEIR fire protection and cultural resources analyses are based on this modified project description. Changes to the project description that have been made since publication of the DEIR are summarized below and incorporated into the revised project description provided in Section 2.0 of this document.

Changes to the EIR text are indicated in strike-through/underline format and with a black line in the right margin. However, Section 4.5 Fire Protection has undergone substantial modification. This section would be difficult to read in strike-through/underline format and therefore tracked changes are not shown therein. You may view a copy of this section in strikethrough/underline format on P&D's website at <http://www.sbcountyplanning.org/projects/02NEW-00138/index.cfm>.

CEQA Guidelines Section 15088.5(c) states, "if the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified." As such, this DEIR Recirculation Document consists of the following revised DEIR sections: 2.0 Project Description, 3.0 Related Projects, 4.4 Cultural Resource, and 4.5 Fire Protection. In addition, the revised FPP and the Historic Resources Assessment, which are considered additions to the EIR Cultural Resources and Fire Protection appendices (Appendices D and E, respectively), are included in this document.

Other sections of the DEIR will be modified in response to public comments and changes to the project description. However, these changes do not result in new significant impacts or otherwise trigger the need for recirculation. These changes will be incorporated into the FEIR.

According to CEQA Guidelines Section 15088.5(f)(2), “*When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR.*” Accordingly, the County requests that commenters limit their comments to the revised portions of the DEIR, which are included in this DEIR Recirculation Document. The FEIR will include responses to comments on the Recirculation Document that pertain to the revised EIR sections as well as responses to comments received during the initial (July 4, 2007 through September 7, 2007) public review period pertaining to other sections of the DEIR.

## **1.2 PROJECT DESCRIPTION MODIFICATIONS**

A number of revisions to individual elements of the project have been made. In total, the proposed square footage of development at the site would decrease by 12,356 square feet (s.f.) as compared to the previously proposed project (65,442 s.f. of total development would occur as compared to 77,798 s.f. under the previously proposed project). The number of proposed new residential units at the site has been reduced from 8 to 3, a reduction of 5 units. A list of the revised Project Description elements is provided below.

### West of Mission

- Increase in size of addition to office (E5) (+ 119 s.f. of floor area).
- Reduction in size of addition to Director’s Garage (E28) (- 57 s.f. of floor area).
- Change to entry sequence, including elimination of 1 building [P3 and P4 are combined into one building (referred to herein as P3)], reduction of 469 s.f. of floor area, relocation of proposed buildings off 30% slopes.
- Change to design of Education Center (P1B) including reduction of 3,941 s.f. of floor area.
- Addition of the Meadow Terrace project.

### East of Mission

- Change to design of Research/Herbarium (P5) resulting an increase of 687 s.f. of floor area.
- Change to design of Horticultural Unit to eliminate 2 buildings. P6, P7, and P8 are combined into one building (P6/7/8) resulting in a total net increase of 136 s.f. Relocation of proposed building off 30% slopes.
- A net increase of 38 s.f. of floor area to Horticulture Garage and Support (P9).
- Elimination of shade structure (E30) resulting in a decrease of 405 s.f.

### Hansen Site

- Restore existing duplex (E23) rather than demolition and replacement with new duplex (P14), resulting in a net decrease of 1,419 s.f. of floor area.
- Restore existing family dwelling (E24) rather than demolition and replacement with new duplex (P11), resulting in a net decrease of 1,260 s.f. of floor area.
- Reduction of Garage/Equipment Storage (P12) by 582 s.f. of floor area.
- Reduction of one of the new duplexes (P13) to a single dwelling unit for a net decrease of 1,133 s.f. of floor area.
- Change in design of single-family residence (P15) for a net increase of 100 s.f. of floor area.
- Elimination of lower garage (P16) for a decrease of 440 s.f. of floor area.

### Cavalli Site

- Elimination of residence previously proposed for Office/Garage (P21) for a decrease of 890 s.f. of floor area.
- Reduction from residential duplex to single-family residence (P22) for a net decrease of 2,824 s.f. of floor area.

### Fencing

- The fencing plan has been revised to replace proposed new cyclone fencing with wildlife and visually permeable perimeter fence (post and smooth wire or wood and stone post). The two horizontal wires or wood rails would be approximately 18 inches and about 3.5 feet from the ground, respectively, allowing for wildlife movement under and above the fence. Fencing would be set back from roadways to avoid pedestrian constraints where feasible. Existing cyclone fencing along Tunnel Road is proposed to be relocated a minimum of six feet from the road where feasible to allow for increased pedestrian movement along the shoulder and improved visual screening of the fence.

### Architecture

- The architectural design of proposed buildings has been modified to better blend into the environment, including the use of green roofs and flat roofs to reduce peak heights. The County's Board of Architectural Review (BAR) has provided conceptual support of the proposed design.

Section 2.0 Project Description of this document incorporates the above changes.

## **1.3 SUMMARY OF REVISED IMPACTS AND MITIGATION MEASURES**

**Table 1-1** summarizes the proposed project's environmental impacts and the measures identified to mitigate these impacts for those issue areas that have been included in this Recirculation Document, i.e., Cultural Resources and Fire Protection. The table also notes the significance of impacts before and after mitigation is implemented. Impacts are classified as follows:

- Class I – Significant impact that cannot be reduced to a less than significant level with implementation of mitigation measures.

- Class II – Significant impacts that can be reduced to a less than significant level with implementation of mitigation measures.
- Class III – Less than significant impacts. Mitigation measures are not required but may be recommended.
- Class IV – Beneficial impacts.

**Table 1-1  
Summary of Impacts and Mitigation Measures**

Description of Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
<p><b>Cultural Resources</b> Archaeological Resources – Impacts CULT 1 and CULT 2 <b>Class II.</b> Project elements that would involve surface and/or subsurface disturbance within or in close proximity to the previously identified boundaries of CA-SBA-22 include the relocation of the Caretaker’s Cottage (E1) and woodshed (E20), the building of P12, P13, and P15, the improvement of the road and parking areas associated with the existing and proposed structures above, and the grading for the roadways, underground utilities, parking areas, structures, and detention basins located on the southern portion of the Hansen Site east of Mission Canyon Road and north of Las Canoas Road. In addition, the introduction of residents in the southerly portion of the Hansen site would increase the potential for indirect impacts on archaeological resources at this location due to an increased potential for vandalizing, sabotaging and collecting artifacts.</p>	<p>Potentially Significant</p>	<p><b>CULT 1-1</b> <u>Avoidance.</u> Avoidance of impacts through redesign of the project is the preferred mitigation approach. Project alternatives that would avoid impacts to CA-SBA-22 are evaluated in this EIR. If avoidance is not feasible, further evaluation and resource recovery through Phase 2 &amp; 3 excavations are required.  <u>Phase 2 and 3 excavations.</u> Phase 2 excavations are defined as testing to the level of determining significance of a resource as well as identifying limits of the resource site. It is recommended that a Phase 2 study address the area within the previously identified boundaries of CA-SBA-22 as well as the area to the north and east of the site (approximately 20 meters in each direction). The Phase 2 study shall be performed consistent with County Archaeological Guidelines. The Phase 2 study will identify the need for a Phase 3 study. The Phase 3 studies would involve the recovery of a larger sample of the site’s resources and essentially result in the clearance of the area (preserving the site on paper and through curation rather than avoidance). If required, the Phase 3 study shall be performed consistent with County Archaeological Guidelines.</p>	<p>Less Than Significant</p>
<p>In addition to the above, the entire Garden property is considered sensitive for archaeological resources except those areas that have already experienced subsurface disturbance. Of particular sensitivity is the area around CA-SBA-22. In addition, historic archaeological resource may be uncovered during demolition of E26-R. Therefore, construction activity involving new subsurface disturbance throughout the project site and demolition of E26-R would result in potentially significant impacts on archaeological resources.</p>	<p>Potentially Significant</p>	<p><b>CULT 2-1</b> Archaeological monitoring shall be conducted by a qualified archaeologist in all areas of grading or ground alterations on the project site and during demolition of E26-R. The archaeological monitor shall have the authority to halt any activities impacting potentially significant archaeological resources and the monitor/archaeological consultant must be permitted to adequately evaluate the find in accordance with CEQA criteria. See mitigation measure CULT 2-2, below, for further discussion of measures to be taken if resources are encountered.</p>	<p>Less Than Significant</p>

Description of Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
		<p><b>CULT 2-2</b> In the event archaeological remains are encountered, work shall be stopped immediately or redirected until a P&amp;D approved archaeologist and Native American representative, as applicable, are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 Investigation of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program consistent with County Archaeological Guidelines, or other recommendations of the archaeologist, and funded by the applicant. Alternatively, if possible, the project may be revised to avoid this impact, subject to County P&amp;D review procedures.</p> <p>If human remains are uncovered, the County Coroner must be notified and, if the remains are determined to be of Native American origin, the Native American Heritage Commission (NAHC) shall be notified and permitted to identify the Most Likely Descendant (MLD). The disposition of the remains will be coordinated between the Coroner, NAHC, MLD, and archaeological consultant.</p> <p>All materials recovered from this property must be curated in a federally recognized repository. In this case, the Department of Anthropology, University of California, Santa Barbara, would be the most likely repository. The project applicant will be responsible for the curation costs.</p>	Significant

Description of Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
<p>Historic Resources</p> <p><b>Class II. Impact CULT 3 - Potential Impacts to the Historic Garden (Including Landmark #24).</b> The proposed project would result in substantial alterations to the Historic Garden. Alterations that have the potential to result in a significant impact on the Historic Garden are:</p> <ul style="list-style-type: none"> <li>• The relocation of the Caretaker’s Cottage and wood shed to locations outside the Historic Garden boundary,</li> <li>• Rehabilitation of the Blaksley Library, Caretaker’s Cottage, and Wood Shed,</li> <li>• The proposed new paving of trails, and</li> <li>• The Meadow Terrace alteration.</li> </ul>	<p>Potentially Significant</p>	<p><b>CULT 3-1</b> The volume, massing, and siting of all new construction both east and west of Mission Canyon Road shall respect the historic character and features of the Historic Botanic Garden and conform to the Secretary of the Interior’s <i>Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Restructuring Historic Buildings and Guidelines for the Treatment of Cultural Landscapes</i>.</p> <p><b>CULT 3-2</b> Limit pavement (including areas improved with pavers) and hardscape to the Administration/Education area, Horticulture/Support area, the currently paved central areas surrounding the Meadow, and selected adjacent areas for accessibility. Paved trail areas shall constitute no more than ten percent (10%) above the existing paved areas within the Historic Garden regardless of material. It is also recommended that the Applicant consider the repaving of the Administration/Education courtyard with more historically appropriate material based on historic photos. Trail design shall reflect the naturalistic and informal patterns historically associated with the trail system. It is recommended that for the currently paved areas and for areas to be paved in accordance with this measure (the 10% additional paved area), alternate materials such as decomposed granite and permeable grids be investigated and that a materials palette be developed to ensure sustainability, integration with the natural environment, and sensitive transition from hardscape to natural sections.</p>	<p>Less Than Significant</p>

Description of Impact	Proposed Mitigation Measures	Significance Before Mitigation	Significance After Mitigation
	<p><b>CULT 3-3</b> The Applicant shall re-design the proposed Meadow Terrace project so that hardscape is minimized and the terrace reflects the naturalistic and informal design historically associated with the area. The hard edge of terrace retaining walls shall be softened, potentially with earthen berms and plantings, to minimize the effect of abrupt changes in elevation. Terrace surfaces and areas between the retaining walls shall remain unpaved and the retaining walls shall not continue east of the footpath surrounding the Meadow. Archival photographs and plans can be used for guidance.</p> <p><b>CULT 3-4</b> The Applicant shall train Garden staff in the maintenance of historic buildings, structures, objects, and furnishings.</p> <p><b>CULT 3-5</b> The Applicant shall change the relocation site for the Caretaker's Cottage and Wood Shed such that both buildings are relocated to a site within the boundaries of the Historic Garden. Plans for structural removal and relocation shall be designed by a P&amp;D qualified architectural historian and comply with County and Secretary of the Interior's Standards and Guidelines. (Potential alternative locations within the Historic Garden that would avoid or lessen impacts to the Historical Garden are evaluated in Section 6.0 of this EIR.)</p> <p><b>CULT 3-6</b> Demolition, removal or destruction, partially or entirely, exterior alterations, additions or changes (other than normal maintenance and repair) to the structures or features identified as being part of Landmark #24 shall be prohibited unless express consent in writing is first had and obtained from Historic Landmarks Advisory Commission, with reasonable conditions imposed as deemed necessary.</p>		

Description of Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
<p><b>Class II.</b> Impact CULT 4 - Potential Impacts to the Gane House: The Gane House is proposed to be remodeled and restored to its original design and its use changed to offices, workrooms, conference rooms, restrooms, storage, and an employee lounge. Without measures to assure that character-defining features of the Gane House would not be compromised during renovation and remodeling, restoration and remodeling of the Gane House would result in a potentially significant impact to historic resources.</p>	<p>Potentially Significant</p>	<p><b>CULT 3-7</b> All historical resource features to be renovated or remodeled shall be documented by a P&amp;D approved architectural historian and completed in accordance with the County and Secretary of the Interior's <i>Standards for the Treatment of Historic Properties</i> to insure maintenance of the integrity.</p> <p><b>CULT 3-8</b> Restoration, renovation, and remodeling of historic structures shall follow the historical guidelines of the County and Secretary of the Interior's <i>Standards for the Treatment of Historic Properties</i>. A P&amp;D-qualified historian shall be retained to identify appropriate preservation and restoration/renovation guidelines for on-site structures pursuant to County Historical guidelines.</p> <p><b>Recommended Mitigation</b></p> <p><b>CULT 3-9</b> The Applicant shall also develop an interpretive program to educate the public on the Garden's development history. This program shall be incorporated into existing docent training, Garden maps, and other materials.</p> <p><b>CULT 4-1</b> Rehabilitation of the Gane House shall conform to the Secretary of Interior's <i>Standards for the Treatment of Historic Properties</i>.</p>	<p>Less Than Significant</p>

Description of Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
<p><u>Cumulative Cultural Resources Impacts</u>  <b>Class II.</b> Over time, archaeological and historic resources are destroyed either through natural events or as a result of development projects or other human activities. As these resources become scarcer, the value of those that remain becomes higher. Planned and pending projects in the area are not expected to adversely affect any historic or archaeological resources, though with any development there is the potential to disrupt or destroy unknown resources, especially given the large number of known sites within the Mission Canyon area. The past projects completed at the Garden did not involve significant ground disturbance and therefore did not significantly impact archaeological resources. However, the pavers installed within the designated County For Landmark within the Garden have incrementally added to the alteration of the historic landscape design concept that is considered significant. For these reasons, cumulative impacts are thus considered potentially significant. Due to the known significance of cultural resources at the Garden, and their growing scarcity in the area, the impacts on archaeological and historic resources identified above are also considered cumulatively considerable.</p> <p><b>Fire Protection</b>  <u>Defensibility from Wildland Fire – Impact FIRE.1</u>  <b>Class II.</b> The proposed project exacerbates on-site fire hazard issues to the extent that it introduces additional structures, staff, residents and visitors that would be exposed to the high fire risk that exists in Mission Canyon. However, the proposed project also includes many fire safety measures to improve conditions on the site as compared to existing conditions. A comprehensive and detailed FPP has been prepared in response to mitigation measures and comments on the DEIR. A number of the FPP requirements would benefit both existing and proposed development and protect existing and future visitors, facility staff, and residents.</p>	<p>Potentially Significant</p>	<p>The mitigation measures identified above for project-specific cultural resource impacts would also reduce the project’s contribution to cumulative impacts to a less than considerable level.</p>	<p>Less Than Significant</p>
<p><b>FIRE 1-1</b> The FPP is documented in the report entitled <i>Santa Barbara Botanic Garden Vital Mission Plan Conceptual Fire Protection Plan</i>, Dudek, Draft November 2008 (contained in Appendix E). SBBG shall be required to implement all requirements set forth in this FPP, which has been approved by the SBCFD and P&amp;D, or subsequent updated versions of the plan as approved by the SBCFD and P&amp;D.</p> <p><b>FIRE 1-2</b> All construction shall be prohibited on red flag days as declared by the County Fire Chief.</p>	<p>Significant</p>	<p>The FPP is documented in the report entitled <i>Santa Barbara Botanic Garden Vital Mission Plan Conceptual Fire Protection Plan</i>, Dudek, Draft November 2008 (contained in Appendix E). SBBG shall be required to implement all requirements set forth in this FPP, which has been approved by the SBCFD and P&amp;D, or subsequent updated versions of the plan as approved by the SBCFD and P&amp;D.</p> <p>All construction shall be prohibited on red flag days as declared by the County Fire Chief.</p>	<p>Less Than Significant</p>

Description of Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
<p>These include expanded fuel modification requirements around all structures, improved water supply/fire flow facilities and capacity throughout the site, improved internal circulation for existing and new development, restrictions on activity during High Fire Season Preparedness periods, closure to the public on red flag alert days declared by the County Fire Chief and an emergency response plan that includes provisions for temporary on-site relocation if necessary.</p> <p>The FPP was reviewed by the Santa Barbara County Fire Department (SBCFD). SBCFD and was found to provide an adequate level of defensibility for the Garden and improve the resources available to emergency personnel for responding to fires in the Mission Canyon area. It was also found that implementation of the FPP in conjunction with the proposed project would result in a reduced fire hazard situation than currently exists in Mission Canyon. However, prior to imposition of a mitigation measure to assure that the FPP will be fully implemented during project construction and throughout the life of the project, the proposed project would result in the potential for a significant impact related to defensibility from wildland fire risks.</p>	<p>Significant</p>	<p>The mitigation measures identified above (Fire 1-1 and 1-2) would to also mitigate this impact.</p>	<p>Less Than Significant</p>
<p><u>Emergency Access in the Mission Canyon Area – Impact FIRE 2</u>  <b>Class II.</b> Fire and other emergency first responders must use a single access (Mission Canyon Road) that the residents and Garden visitors use to relocate or evacuate during a fire event. The relatively narrow Mission Canyon Road with poor sight distances exacerbates this deficiency. The existing risk to canyon residents in terms of emergency evacuation would be exacerbated by the increase in canyon population (both temporary and permanent). However, as described above, the project's FPP includes measures that include the closure of the Garden to public visitors during red flag alert days as declared by the County Fire Chief and a limit on the number of attendees at special events and requires the use of shuttles/small buses for events over 80 guests during High Fire Season Preparedness periods.</p>	<p>Significant</p>	<p>The mitigation measures identified above (Fire 1-1 and 1-2) would to also mitigate this impact.</p>	<p>Less Than Significant</p>

Description of Impact	Significance Before Mitigation	Proposed Mitigation Measures	Significance After Mitigation
<p>It includes improved fuel modification requirements for all on-site structures and improvements in on-site circulation. In addition, the FPP calls for the implementation of a number of fire safety measures that would benefit the Mission Canyon area (not just the Garden property). These include the provision of an emergency helispot to be used by fire crews during wildfire events, establishing a Remote Area Weather Station with connection to local fire agencies to assist Red Flag Fire Alert declarations, provision of a portable pumpkin tank for helicopter buckets or siphoning, and establishing Mission Canyon residents and all SBBG telephone numbers with Santa Barbara County Sheriff's Department so that use of the Reverse 911 Emergency Notification System works efficiently during a wildfire emergency. Given the above, it is expected that the proposed project including the FPP would not substantially exacerbate existing evacuation issues and the restrictions in Garden activity would ameliorate these issues. However, prior to imposition of a mitigation measure to assure that the FPP, including all restrictions on use, will be fully implemented during project construction and throughout the life of the project, and absent restrictions on construction activities during declared red flag days, the proposed project would result in the potential for a significant impact related to evacuation of the area.</p>	<p>Significant</p>	<p>Water supply and pressure shall be enhanced to meet County Fire Department standards as set forth in Mitigation PF 2-1.</p>	<p>Less Than Significant</p>
<p><b>Fire Flow and Water Pressure – Impact FIRE 3</b>  <b>Class II.</b> Existing water supply and pressure at the Garden is substandard for serving the project site. Water supply for fire protection purposes to serve the proposed project, including the addition of several fire hydrants as dictated by the County Fire Department, would improve fire flows and water pressure for fire suppression activities. However, based on an analysis of the existing water supply system surrounding the Garden and flow tests of hydrants served by the existing water supply system, fire hydrants served by the proposed water system improvements would not meet County Fire Department standards for commercial flows and pressure as currently proposed (i.e. 1,250 gpm at 20 psi residual pressure for 2 hours), though they would meet residential standards (750 gpm). While this would be an improvement over its existing system, because it would not meet</p>			

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<p>County Fire Department requirements for commercial facilities, impacts related to fire flow and water pressure would still be considered significant.</p> <p><u>Increased Potential for Wildland Fires – Impact FIRE.4</u></p> <p><b>Class II.</b> An increase in human activity and operation of construction equipment in the project area would increase the potential for wildfires caused by human activities. However, as described above, the project’s FPP includes measures that would reduce on-site population during declared red flag alert days and High Fire Season Preparedness periods. With these measures, the project would not result in a significant increase in the potential for wildfires. Nevertheless, prior to imposition of a mitigation measure to assure that the FPP will be fully implemented during project construction and throughout the life of the project, and absent restrictions on construction activities during declared red flag alert days, the proposed project would result in the potential for a significant impact related to an increased potential for wildland fires.</p>	<p>Significant</p>	<p>The mitigation measures identified above (Fire 1-1 and 1-2) would to also mitigate this impact.</p>	<p>Less Than Significant</p>
<p><u>Cumulative Fire Hazard Impacts</u></p> <p><b>Class II.</b> The Mission Canyon community, including the Garden and surrounding residential neighborhoods, is presently subject to a significant risk from a wildland fire. Related projects include currently planned development projects in the area north of Foothill Road: new single-family residences, several other smaller residential additions and rebuilds, and minor projects at the Garden itself. The proposed project in combination with additional development in the area would exacerbate existing fire risks, which is considered a significant cumulative impact. However, the project’s FPP measures would increase fire protection at the site and would improve the fire fighting abilities of local emergency personnel in this area of the canyon. Nevertheless, prior to assurance of full and continued implementation of the FPP, the project’s contribution to cumulative fire impacts is considered cumulatively considerable.</p>	<p>Significant</p>	<p>The mitigation measures identified above (Fire 1-1, 1-2 and PF 2-1) would also reduce the project’s contribution to cumulative impacts to a less than considerable level.</p>	<p>Less Than Significant</p>