



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

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Governor's Office of Planning & Research

April 28, 2021

Apr 28 2021

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STATE CLEARINGHOUSE

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

Dear Mr. Bobroff:

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

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

CDFW's Role

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

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

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

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

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

COMMENTS AND RECOMMENDATIONS

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

Comment 1: Adequacy of CEQA-Evaluation for Rare Plants

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

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

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

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

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

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

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

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

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

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

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

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

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

Comment 2: Mitigation for Impacts to Rare Plants

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

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

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

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

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

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

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

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

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

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

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

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

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

Comment 3: Mitigation for Sensitive Vegetation Communities

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Filing Fees

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

Conclusion

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

Sincerely,

DocuSigned by:

Erinn Wilson-Olgin

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Environmental Program Manager I
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ec: CDFW

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References

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

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

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

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

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

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

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

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

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

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	have documented topsoil salvage had no effect on the recolonization of the target plant species (Hinshaw, 1998, Dixon, 2018). Based on the scientific literature available, relying on topsoil salvage alone to mitigate impacts to CEQA		
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