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March 14, 2023

Dana Eady
Planning Manager
City of Santa Maria
110 South Pine Street, Room 101
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Subject: Comments on the Draft Environmental Impact Report for the for the Richards Ranch Annexation Project (AN2021-0001) Project #2128, SCH #2022020194, Santa Barbara County

Dear Dana Eady:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) for the Richards Ranch Annexation Project (Project). The City of Santa Maria (City) is the lead agency preparing a DEIR pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 15082 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*

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

Project Description/Objectives: The Project's purpose is the pre-zoning of four parcels totaling 43.75 acres, located in unincorporated Santa Barbara County by the City of Santa Maria, and annexation of the property into the Santa Maria City limits. The parcels will be pre-zoned and developed with high density residential (27.4 acres) and general commercial uses (16.35 acres). The Project would require approval from the Santa Barbara County Local Agency Formation Commission (SBLAFCO) for the annexation of the parcels. The DEIR prepared for this Project is intended to meet SBLAFCO requirements for annexation.

Project Location: The Project site includes four parcels located to the northeast and southeast of the intersection of State Route 135 and Union Valley Parkway in the unincorporated community of Orcutt in Santa Barbara County. The Project site is adjacent to the southeastern limits of the City of Santa Maria and lies within the City's Sphere of Influence. The Project site is approximately 1.5 miles west of U.S. Route 101 and 2.3 miles northeast of State Route 1. The Santa Maria Airport District property is located to the west of State Route 135 and northwest of the Project site, with the terminus of the main runway approximately 0.75 mile to the northwest.

Existing land use to the north and east is open space, and housing is to the south and west.

Specific Comments

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: Overwintering Monarch Butterfly

Issue: Monarch butterflies (*Danaus plexippus plexippus*) are federal Endangered Species Act (FESA) candidate species and are considered a special-status species in California. The CEQA document does not adequately analyze Project impacts on monarch butterflies.

Specific impact: The Project will result in permanent impacts to monarch butterfly due to the removal of trees utilized for overwintering. The Project area is part of a significant overwintering site, and historical use of this area is documented on the California Natural Diversity Database (CNDDB) Occurrence 354. Monarchs can be found overwintering along the California coast in groves of trees primarily dominated by non-native eucalyptus (*Eucalyptus spp*.), with additional native species including Monterey pine (Pinus radiata) and Monterey cypress (*Hesperocyparis macrocarpa*) (Griffiths & Villablanca, 2015; Pelton et al., 2016). Overwintering groves have specific microclimatic conditions that support monarch populations (Fisher et al., 2018).

Why impacts would occur: Project-related activities have the potential to impact special-status species and overwintering habitat of the monarch butterfly. The Project proposes to remove 7.63 acres of on-site eucalyptus trees that support an inland overwintering monarch grove. Although CDFW has designated the Project site as an area of high conservation value for monarch butterflies (Area of Conservation Concern HEX ID 50049), the DEIR determined the removal of the trees was not significant. Likewise, the DEIR did not offer any avoidance, minimization, or mitigation measures to reduce impacts to monarch butterfly.

The DEIR cites the decline of numbers of monarch observed at the Project site as justification for not considering the site a significant winter roost. The DEIR states the Project site is not a roost due to 1) one year having no monarch butterflies recorded (2019) during an extended drought, and 2) low numbers of monarchs recorded overwintering in other years (using 6 years of data 2015-2019 and 2021/2022 season counts). The numbers of monarchs observed on the Project site has increased from 0 in 2019 to 34 during the 2021/22 survey count, consistent with lower numbers of monarchs range wide. The Pismo Preserve (San Luis Obispo County) cited by the DEIR as supporting over 22,000 monarchs only had 36 overwintering monarchs counted at the 2020/21 New Year Survey (Xerces, 2022). The majority of roosts supporting overwintering monarchs in Santa Barbara County from 2016 to 2022, tracked by CDFW and the Xerces Society, contain an average of 451 individuals. Of these Santa Barbara County data, many sites had a low population count of zero for many years, and the highest population was recorded at 34,000 individuals at The Nature Conservancy preserve in 2022.

Inland winter roosts in the Santa Maria area contain lower numbers of monarch butterflies than coastal roosts but are still biologically significant resources for this species. The largest aggregation of monarchs historically observed in the Santa Maria Area was 1100 individuals (1998) in a grove on the south side of Pioneer Park, which was subsequently cut down between 2009-2012 for road/trail construction (CNDDB Occurrence 352). The value of inland Santa Maria overwintering sites in the DEIR should not be established by comparing these roosts to the larger Pismo Preserve coastal overwintering site. The inland Santa Maria overwintering sites have always been aggregations of smaller numbers of individuals but provide a valuable ecological niche to the species. Removal of smaller overwintering roosts forces the congregation of monarchs into larger colonies where stochastic events (disease, fire, grove removal, climate change) could cause loss of the entire species. Multiple overwintering sites that are widely distributed buffers the species against catastrophic loss and extinction. Based on the biological value of these smaller roosts in the inland Santa Maria area, CDFW considers the loss of this roost significant without the incorporation of mitigation to replace the overwintering habitat of this roost.

The CNDDB has records of several projects in the general vicinity of this Project (e.g., road construction grove removal at pioneer park, trail maintenance, food bank solar project) that have removed known monarch roosts. Based on the cumulative loss of monarch overwintering groves in the Santa Maria area documented in the CNDDB, CDFW considers the loss of this roost significant without the incorporation of mitigation to replace the overwintering value available to monarchs.

Evidence impact is potentially significant: During the last three decades, the western migratory monarch population that overwinters along the California coast has declined by more than 99% (Marcum & Darst, 2021). Habitat loss and fragmentation, including grove senescence, are among the primary threats to the population (Thogmartin et al., 2017). Monarch overwintering sites have specific microclimate conditions that are influenced by the configuration of trees and other foliage near the site (Griffiths & Villablanca, 2015). Alteration of the site and surrounding areas could impact microclimate conditions, thereby reducing the suitability of the site for monarchs (Weiss et al., 1991). Project activities have the potential to significantly impact the species by reducing possible overwintering habitat or altering habitat climatic conditions.

CEQA Guidelines Section 15130 requires the consideration of cumulative impacts within an EIR. Potential significant impacts associated with cumulative removal of eucalyptus trees and known overwintering groves in the Santa Maria area were not evaluated in the DEIR.

CDFW considers impacts to rare species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. Project(s) activities have the potential to significantly impact the species by reducing possible roosting habitat.

Recommended Potentially Feasible Mitigation Measures:

To evaluate potential impacts of the Project to monarch butterflies, CDFW recommends the following mitigation measures as conditions of approval in the Project's CEQA document.

Mitigation Measure #1: Avoidance

CDFW recommends redesigning the proposed development to avoid removal of the eucalyptus trees that support monarch overwintering habitat.

Monarch overwintering habitat should be avoided by delineating and observing a no-disturbance buffer of at least ½ mile from the outer edge of the habitat (Marcum & Darst, 2021). If buffers cannot be maintained, then consultation with CDFW is warranted to determine how to implement ground and tree-disturbing activities and avoid take.

Mitigation Measure #2: Monarch Butterfly Habitat Assessment

CDFW recommends consulting with a qualified biologist knowledgeable of the history of the grove to determine primary roosting trees and other structural components or flora integral to maintaining microclimate conditions. These plants should be marked and avoided during project activities. The Project proponent should avoid the cutting or trimming of trees within core overwintering habitat except for specific grove management purposes, and/or human health and safety purposes. The habitat should be assessed by conducting surveys following CDFW recommended protocols or protocol-equivalent surveys that have been developed by experts, such as the Xerces Society Western Monarch Count Protocol.

Mitigation Measure #3: Monarch Habitat Avoidance

Management activities in groves should be conducted between March 16 and September 14, in coordination with a qualified biologist (Marcum & Darst, 2021). A qualified biologist should be retained to conduct a habitat assessment, well in advance of Project implementation. The qualified biologist should assess habitat following the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (The Xerces Society, 2017) or other protocols with prior approval by CDFW.

Recommendation #1: Cumulative Impact CEQA Impact Analysis

The CEQA document should address and fully analyze the cumulative impacts, and specifically against the loss of smaller inland roosts that serve a separate biological function to the larger coastal roosts.

Recommendation #2: Biological Significance CEQA Impact Analysis

The CEQA document should evaluate how the proposed development would impact the known overwintering monarch habitat on site as well as how this would affect both the local and regional overwintering populations. Mitigation measures to mitigate for the loss of an

overwintering inland roost should be included to ensure no net loss of overwintering roost habitat.

COMMENT #2: Monarch Butterfly – Pesticides

Issue: Use of pesticides during all phases of the Project have the potential to impact monarch butterflies, a special-status species, and their overwintering habitat. The use of pesticides has been linked to direct and indirect effects on the monarch population (The Center for Biological Diversity et al., 2014).

Specific Impact: Potential significant impacts associated with the Project's use of pesticides include poisoning of adult and larval monarchs, reduced vigor or reproductive success, mortality of adult and larval monarchs, and loss of essential habitat.

Why impact would occur: Pesticide use on the Project site has the potential to impact monarchs in two ways. First, if the overwintering grove is avoided and left on site, monarch using the site would be exposed to pesticides used around nectar plants on the Project site as well as direct spray exposure. Second, if the on-site grove is removed, the monarchs in the general vicinity that use landscape plants on the Project site would be exposed to pesticides either by direct spray exposure or residually in pollen/nectar.

The widespread use of pesticides is a major threat to monarch butterfly populations. Broadcast spraying of herbicides like glyphosate have led to a decline in abundance of milkweed, which directly impacts monarchs' ability to reproduce (Pleasants & Oberhauser, 2013; Thogmartin et al., 2017). Insecticides like neonicotinoids show up in the tissues and nectar of milkweed and other flowering plants, reducing survival of larval and adult monarchs (Halsch et al., 2020; Krischik et al., 2015).

Evidence impact is potentially significant: Monarch butterflies are ESA candidate species and are considered a special-status species in California. CDFW considers impacts to rare species a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures.

Project(s) activities have the potential to significantly impact the species by reducing possible foraging habitat and exposing all stages of the monarch lifecycle to detrimental substances such as pesticides.

Recommended Potentially Feasible Mitigation Measures:

Mitigation Measure #1: Pesticide Avoidance

The CEQA document should include measures that minimize/prohibit the use of synthetic pesticides and herbicides on the Project site. Use of neonicotinoids, which may include nursery plants or seeds that have been treated with neonicotinoids, should be avoided. Spraying pesticides within a mile of an overwintering site from mid-September to mid-March should be prohibited (Marcum & Darst, 2021).

Mitigation Measure #2: Pesticide Use

If pesticide use cannot be precluded from the Project, a qualified biologist should survey the Project area for suitable monarch breeding or foraging habitat and the presence of monarchs in various life stages. If monarchs are found to be present on the site, only targeted pesticide application techniques should be used within a mile of the Project area. If monarchs are not present at the site and the Project intends to broadcast spray pesticides, CDFW recommends that all manufacturer recommended application techniques and precautions be followed, including those for storage and disposal. The CEQA document should require the use of pesticides and techniques recommended for use near pollinators by the United States Environmental Protection Agency (USEPA) and California Department of Pesticide Regulation (DRP). Guidance can be found at the USEPA website and the DPR website. Pesticide application should minimize drift of pesticides outside of the target area by maintaining a spatial buffer of at least 40 feet from suitable monarch habitat (Marcum & Darst, 2021; Pelton et al., 2018). All pesticide application must be conducted by a Licensed and Certified Pesticide Applicator.

Recommendation #1: Impact Analysis

The CEQA document should disclose the use of pesticides and discuss its associated impacts, including the risk of secondary poisoning to non-target species.

COMMENT #3: California Tiger Salamander

Issue: The Project is within the range that supports California tiger salamander (*Ambystoma californiense*) upland dispersal habitat adjacent to a breeding pond. The Project site contains an emergent wetland that could support water for extended periods during wet years.

Specific Impact: The Project site is on the border of mapped California tiger salamander range, with a small portion of the Project falling inside mapped suitable California tiger salamander habitat. The Project site contains suitable upland habitat and potentially suitable aquatic habitat for California tiger salamander. The Project site is immediately adjacent to the line drawn on CNDDB as the species range. Surveys were not completed to determine presence or absence of California tiger salamander on the Project.

Why impact would occur: CDFW is concerned with the potential for Project related impacts to California tiger salamander aquatic and upland habitat on the Project site and is concerned with the potential for take of California tiger salamander. CDFW and the United States Fish and Wildlife Service have developed survey protocol (Guidelines) to be used to detect California tiger salamander in aquatic and upland habitat with the potential to support California tiger salamander (Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander, http://www.dfg.ca.gov/wildlife/nongame/docs/CTSFinalGuide10-03.pdf). Examples of take include killing of California tiger salamander by heavy equipment during grading activities or during wetland removal. Without completing surveys following CDFW and United States Fish and Wildlife Service Guidelines, the Project may result in undisclosed and unmitigated take of California tiger salamander.

Evidence impact is potentially significant: Under the California Endangered Species Act (CESA), take of any endangered, threatened, candidate species, or state-listed rare plant

species that results a project is prohibited, except as authorized by State law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, any activity during the life of a project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)).

Revisions to the Fish and Game Code, effective January 1998, require CDFW to issue a separate CEQA document for the issuance of a CESA permit, unless the project CEQA document addresses all project impacts to the listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. It is imperative with these potential permitting obligations that the CEQA documents include a thorough and robust analysis of the potentially significant impacts to California tiger salamander and their habitat which may occur as a result of the proposed Project. For any such potentially significant impacts, the City should also analyze and describe specific, potentially feasible mitigation measures to avoid or substantially lessen any such impacts as required by CEQA and, if an ITP is necessary, as required by the relevant permitting criteria prescribed by Fish and Game Code section 2081, subdivisions (b) and (c). The failure to include this analysis in the CEQA documents could preclude CDFW from relying on the city's analysis to issue an ITP without CDFW first conducting its own, separate lead agency subsequent or supplemental analysis for the project (See, e.g., Cal. Code Regs., tit. 14, § 15096(f); Pub. Resources Code, § 21166).

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: Surveys

Protocol surveys following the Guidelines should be conducted on site to determine presence or absence of California tiger salamander. If California tiger salamander are present, the City should consult with CDFW under CESA for potential take coverage resulting from this Project.

Comment #4: Lake and Streambed Alteration Agreement (LSAA)

Issue: CDFW has determined that features subject to Fish and Game Code, section 1600 et seq. may be impacted by the proposed Project.

Specific Impact: The DEIR states the Project could result in impacts to features CDFW regulates under section 1600 et seq. The Project proposes to remove riparian vegetation, fill a freshwater emergent wetland/seep, and alter surface drainage patterns.

Why impact would occur: The Project may divert surface drainage or otherwise alter the existing drainage pattern of the Project site. Runoff with high total suspended solids and total dissolved solids has been shown to be high in nutrients as well as other contaminants.

The Project may substantially adversely affect the existing drainage patterns of the Project site through the alteration or diversion of water, which absent specific mitigation, could result in substantial erosion or siltation on-site or off-site of the Project.

Evidence impact would be significant: The Project may impact streams and associated riparian habitats. CDFW exercises its regulatory authority (Fish and Game Code, section 1600 *et seq*.) to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. Fish and Game Code, section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream, or lake.

CDFW requires a Lake and Streambed Alteration Agreement (LSA) Agreement when a project activity may substantially adversely affect fish and wildlife resources. For reasons discussed above, the Project continues to have a substantial adverse effect on streams and associated riparian habitat through direct removal, filling, hydrological interruption, or other means.

Mitigation Measure #1: Notification

CDFW has concluded that the Project may result in the alteration of features regulated by CDFW. For any such activities, the Project applicant (or "entity") must provide notification to CDFW pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. Please visit CDFW's Lake and Streambed Alteration Program webpage to for information about LSAA notification and online submittal through the Environmental Permit Information Management System (EPIMS) Permitting Portal (CDFW 2023).

CDFW's issuance of an LSAA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 1600 et seq. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSAA.

Any LSAA issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project site. The LSAA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to aquatic resources, additional mitigation conditioned in any LSAA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

Additional Recommendations

Weed Management Plan. A weed management plan should be developed for the Project area and implemented both during and for at least three years post-Project. Soil disturbance promotes establishment and growth of non-native weeds. As part of the Project, non-native weeds should be prevented from becoming established both during and after construction, to control the local spread of invasive plants. The Project area should be monitored via mapping

for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan. Monitoring for spread of invasive weeds to adjacent lands should also be included.

Project Landscaping. CDFW encourages landscaping using native trees and shrubs to benefit native wildlife such as insect pollinators. Insect pollinators such as the monarch butterfly and native bees have declined drastically relative to 1980s levels and have had an especially drastic decline since 2018 (Goulson et al., 2015; Marcum & Darst, 2021). Habitat loss may be a primary driver of monarch decline in the west (Crone et al., 2019). CDFW recommends planting native flowering species over non-native ornamental species where possible. Tropical milkweed (*Asclepias currasavica*) should never be included in landscaping. In addition, the planting of native milkweed species can help to provide breeding habitat for monarch butterfly (not recommended within five miles of the coast north of Santa Barbara County and within one mile of the coast south of Santa Barbara County (Marcum & Darst, 2021)).

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 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) 848-8382 or by email at Kelly.Schmoker@wildlife.ca.gov.

Sincerely,

DocuSigned by:
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Erinn Wilson-Olgin
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Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP should reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		**Timing**	**Responsible Party**
MM-BIO-1- Monarch Butterfly-Avoidance, Project Development Redesign	CDFW recommends redesigning the proposed development to avoid removal of the eucalyptus trees that support monarch overwintering habitat. Monarch overwintering habitat shall be avoided by delineating and observing a no-disturbance buffer of at least ½ mile from the outer edge of the habitat (Marcum & Darst, 2021). If buffers cannot be maintained, then consultation with CDFW is warranted to determine how to implement ground and tree-disturbing activities and avoid take.	Prior to Project construction and activities	City of Santa Maria/ Applicant
MM-BIO-2- Monarch Butterfly-Habitat Assessment	CDFW recommends consulting with a qualified biologist knowledgeable of the history of the grove to determine primary roosting trees and other structural components or flora integral to maintaining microclimate conditions. These plants should be marked and avoided during project activities. The Project proponent should avoid the cutting or trimming of trees within core overwintering habitat except for specific grove management purposes, and/or human health and safety purposes. The habitat should be assessed by conducting surveys following CDFW recommended protocols or protocol-equivalent surveys that have been developed by experts, such as the Xerces Society Western Monarch Count Protocol.	Prior to Project construction and activities	City of Santa Maria/ Applicant
MM-BIO-3- Monarch Butterfly-Habitat Avoidance	Management activities in groves should be conducted between March 16 and September 14, in coordination with a qualified biologist (Marcum & Darst, 2021). A qualified biologist shall be retained to conduct a habitat assessment, well in advance of Project implementation. The qualified biologist shall assess habitat	Prior to Project construction	City of Santa Maria/ Applicant

	following the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (The Xerces Society, 2017) or other protocols with prior approval by CDFW.	and activities	
MM-BIO-4- Monarch Butterfly-Pesticide Avoidance	The CEQA document shall include measures that minimize/prohibit the use of synthetic pesticides and herbicides on the Project site. Use of neonicotinoids, which may include nursery plants or seeds that have been treated with neonicotinoids shall be avoided. Spraying pesticides within a mile of an overwintering site from mid-September to mid-March should be prohibited (Marcum & Darst, 2021).	Prior to/ During/ After Project construction and activities	City of Santa Maria/ Applicant
MM-BIO-5- Monarch Butterfly**-** Pesticide Use	If pesticide use cannot be precluded from the Project, a qualified biologist should survey the Project area for suitable monarch breeding or foraging habitat and the presence of monarchs in various life stages. If monarchs are found to be present on the site, only targeted pesticide application techniques should be used within a mile of the Project area. If monarchs are not present at the site and the Project intends to broadcast spray pesticides, CDFW recommends that all manufacturer recommended application techniques and precautions be followed, including those for storage and disposal. The CEQA document should require the use of pesticides and techniques recommended for use near pollinators by the United States Environmental Protection Agency (USEPA) and California Department of Pesticide Regulation (DRP). Guidance can be found at the USEPA website and the DPR website. Pesticide application should minimize drift of pesticides outside of the target area by maintaining a spatial buffer of at least 40 feet from suitable monarch habitat (Marcum & Darst, 2021; Pelton et al., 2018). All pesticide application must be conducted by a Licensed and Certified Pesticide Applicator.	Prior to/ During/ After Project construction and activities	City of Santa Maria/ Applicant
MM-BIO-6- California Tiger Salamander-Presence/Absence Surveys	Protocol surveys following the Guidelines should be conducted on -site to determine presence or absence of California tiger salamander. If California tiger salamander are present, the City should consult with CDFW under CESA for potential take coverage resulting from this Project	Prior to Project construction and activities	City of Santa Maria/ Applicant
MM-BIO-7- LSAA-Notification	CDFW has concluded that the Project may result in the alteration of features regulated by CDFW. For any such activities, the Project applicant (or "entity") must provide notification to CDFW pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW determines	Prior to Project construction	City of Santa Maria/ Applicant

	whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. Please visit CDFW's Lake and Streambed Alteration Program webpage to for information about LSAA notification and online submittal through the Environmental Permit Information Management System (EPIMS) Permitting Portal (CDFW 2023). CDFW's issuance of an LSAA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 1600 et seq. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA. Any LSAA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project site. The LSAA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to aquatic resources, additional mitigation conditioned in any LSAA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.	and activities	
REC-BIO-1- Analysis of Cumulative impacts to Monarch Butterfly	The CEQA document should address and fully analyze the cumulative impacts, and specifically, against the loss of smaller inland roosts that serve a separate biological function to the larger coastal roosts. Absent of this analysis the Project may still result in significant impacts.	Prior to Project construction and activities	City of Santa Maria/ Applicant
REC-BIO-2- Analysis of Overwintering Habitat for Monarch Butterfly	The CEQA document should evaluate how the proposed development would impact the known overwintering monarch habitat on site as well as how this would affect both the local and regional overwintering populations. Mitigation measures to mitigate for the loss of an overwintering inland roost should be included to ensure no net loss of overwintering roost habitat.	Prior to Project construction and activities	City of Santa Maria/ Applicant

REC-BIO-3- Analysis of Pesticide Use	The CEQA document should disclose the use of pesticides and discuss its associated impacts, including the risk of secondary poisoning to non-target species.	Prior to Project construction and activities	City of Santa Maria/ Applicant
Rec-BIO-4- Weed Management Plans	A weed management plan shall be developed for the Project area and implemented both during and for at least 3 years post-Project. Soil disturbance promotes establishment and growth of non-native weeds. As part of the Project, non-native weeds should be prevented from becoming established both during and after construction, to control the local spread of invasive plants. The Project area should be monitored via mapping for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan. Monitoring for spread of invasive weeds to adjacent lands should also be included.	Prior to Project construction and activities	City of Santa Maria/ Applicant
REC-BIO-5- Landscaping	The Project shall use native trees and shrubs to benefit native wildlife such as insect pollinators. Insect pollinators such as the monarch butterfly and native bees have declined drastically relative to 1980s levels and have had an especially drastic decline since 2018 (Goulson et al., 2015; Marcum & Darst, 2021). Habitat loss may be a primary driver of monarch decline in the west (Crone et al., 2019). CDFW recommends planting native flowering species over non-native ornamental species where possible. Tropical milkweed (*Asclepias currasavica*) should never be included in landscaping. In addition, the planting of native milkweed species can help to provide breeding habitat for monarch butterfly (not recommended within five miles of the coast north of Santa Barbara County and within one mile of the coast south of Santa Barbara County (Marcum & Darst, 2021)).	Prior to Project construction and activities	City of Santa Maria/ Applicant