



State of California – Natural Resources Agency
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August 26, 2024

Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
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**SUBJECT: MITIGATED NEGATIVE DECLARATION FOR THE RANCHO LUIS
EQUESTRIAN FACILITY PROJECT; SANTA BARBARA COUNTY,
SCH#2024070884**

Dear Jacquelynn Ybarra,

The California Department of Fish and Wildlife (CDFW) has reviewed the Mitigated Negative Declaration (MND) for the Rancho Luis Equestrian Facility Project (Project) from the Santa Barbara County Planning Department (County). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's 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 & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. 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 (Pub. 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 & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*),

Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 2 of 16

CDFW recommends the Project Applicant obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Objective: The Project applicant is requesting approval of a County Conditional Use Permit and Development Plan for the operation of a large animal boarding and equestrian training facility, and to further develop the site with various structures to support an existing ranch property. Development would include a 2,165 square-foot warehouse, a 630 square-foot warehouse, 1,680 square feet of animal shade structures, a 720 square-foot barn conversion to a guesthouse, a 1,300 square-foot warehouse and employee dwelling unit, an 850 square-foot warehouse, and a 2,655 square-foot warehouse. Unpermitted structures would be validated, including a 289 square-foot shed and two 320 square-foot storage containers. Total development on site would be 37,541 square feet and would occur over approximately 10 years. Up to 54 large animals would be boarded, and equestrian training would occur Monday – Sunday, with special events occurring up to four times a year. A total of 27 on-site parking spaces would be added, portions of the site would be screened and landscaped, and a private road accessing the site would be widened to 20 feet at certain locations.

Location: The Project site is a 25.1-acre parcel (Assessor's Parcel Number 137-120-073) at 826 Ballard Canyon Road, located in the Santa Ynez Valley in unincorporated Santa Barbara County. The parcel is north of Highway 246 and north of the Santa Ynez River along Thumbelina Creek between the City of Buellton and the City of Solvang.

Biological Setting: Thumbelina Creek, an ephemeral tributary of the Santa Ynez River, runs along the entire western side of the Project area. The Santa Ynez River and associated willow riparian woodland is located less than one mile downstream from the Project site.

The Project site is currently an equestrian facility with stalls and pastures used to board horses and other livestock. The majority of the property is perennial rye pasture with coast live oak (*Quercus agrifolia*), and valley oak (*Quercus lobata*) trees spread throughout the site. Wildlife species expected to inhabit the site include common species such as turkey vulture (*Cathartes aura*), red-tailed hawk (*Buteo jamaicensis*), western scrub jay (*Aphelocoma claiornica*), brush rabbit (*Sylvilagus bachmani*), western gray squirrel (*Sciurus griseus*), and western fence lizard (*Sceloporus occidentalis*). The following special-status wildlife species have a high to moderate potential to occur in the Santa Ynez River and the riparian woodland vegetation that exists in the southern portion of the property: southern steelhead trout (*Oncorhynchus mykiss irideus*; federal Endangered Species Act (ESA) listed-endangered); California red-legged frog (*Rana draytonii*; ESA listed -threatened; California Species of Special Concern (SSC)); least Bell's vireo (*Vireo bellii pusillus*; ESA- and California Endangered Species Act (CESA)- listed endangered); southwestern willow flycatcher (*Empidonax traillii*; ESA- and CESA- listed-endangered); western pond turtle (*Actinemys marmorata*;

Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 3 of 16

currently under consideration for ESA listing, SSC); pallid bat (*Antrozous pallidus*; SSC); and two-striped garter snake (*Thamnophis hammondi*; SSC). These special-status species have a low potential to occur in the area where new structures and equestrian event facilities will be built.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the County in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

Comment #1: Impacts to Streams

Issue: The Project may result in runoff of pollutants into Thumbelina Creek, a tributary to the Santa Ynez River.

Specific impacts: The proposed Project site utilizes a driveway from Ballard Canyon Road that aligns with the historic alignment of Thumbelina Creek. That access road will likely see heavy traffic use and potentially require maintenance. The existing equestrian facility and proposed expansion may create pollutants that could flow into Thumbelina Creek, which is adjacent to the Project site. In addition, the riparian vegetation may be degraded through habitat modification (e.g., encroachment and edge effects leading to introduction of non-native plants).

Why impacts would occur: It is unclear if runoff is already entering Thumbelina Creek from the Project site or if runoff will start after the Project has been completed. Downstream and associated biological resources beyond the Project development footprint may also be impacted by altered watershed effects resulting from Project activities, such as riparian habitat.

The MND identifies the extent of stream resources on site in Figure 5 of Appendix A; however, it does not discuss the potential need for a Section 1602 Lake and Streambed Alteration Agreement for activities that may deposit or dispose of material into any river or stream. Furthermore, there is no discussion of potential maintenance work to be done on the driveway, or associated culvert that directs Thumbelina Creek. As a result, the Project could result in unmitigated significant impacts to streams and associated habitat.

Evidence impacts would be significant: Changes to hydrology, both within the Project area and downstream, may result in direct and indirect physical changes in the environment. Any changes to hydrology from project activities and their potential impacts on biological resources should be analyzed and disclosed in the environmental

Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 4 of 16

document. Adequate disclosure is necessary for CDFW to assist a lead agency in adequately identifying, avoiding, and/or mitigating a project's significant, or potentially significant, direct, and indirect impacts on biological resources.

CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 *et seq.* to conserve fish and wildlife resources which include 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 (LSA) Notification when a project activity may substantially adversely affect fish and wildlife resources. The Project may result in significant impacts on streams and associated natural communities if development of sites identified by the Project or future projects would be in close proximity to these resources. Without appropriate mitigation, the Project may have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on fish and wildlife resources, including rivers, streams, or lakes and associated natural communities identified by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: The Project shall include an assessment of direct and indirect impacts to Thumbelina Creek. CDFW recommends the MND include an analysis of potential impacts on biological resources resulting from the proposed runoff. The analysis should discuss changes in hydrology and hydraulics using the following considerations:

1. under pre-project (i.e., baseline) conditions, the volume of runoff from the Project area, including sediment and pollutant loads;
2. under proposed Project conditions, any potential changes to the amount of runoff from the Project site and how the proposed bio-swales or bio-filters will reduce the level of pollutants entering the River to less than significant; and
3. an analysis of potential Project-related changes to Thumbelina Creek. This includes water depth (percent change), wetted perimeter (acres gained/lost), and velocity (percent change).

Mitigation Measure #2: If Project activities will substantially adversely affect fish and wildlife species, the Project shall notify CDFW pursuant to Fish and Game Code 1602 and obtain LSA authorization from CDFW prior to initiating activities that could affect streambed resources. The County shall include a requirement to comply with mitigation measures detailed in any LSA authorization issued by CDFW. The County shall also

Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 5 of 16

include a requirement to provide compensatory mitigation for any impacted stream and associated natural community acceptable to CDFW. Please visit CDFW's Lake and Streambed Alteration Program webpage for more information (CDFW 2024a).

Recommendation #1: CDFW's issuance of a LSA Agreement 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 lead agency/project applicant for the project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 *et seq.* and/or under CEQA, a project's 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 Agreement. To compensate for any on and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity.

Comment #2: Buffer Zone

Issue: The Project may result in direct and indirect impacts to wildlife in the on-site riparian habitat.

Specific impacts: The Project may result in reduced reproductive capacity, population declines, or local extirpation of wildlife. In addition, indirect impacts from lighting, noise, and increased anthropogenic presence may also occur.

Why impacts would occur: According to the MND, page 24 states,

...[a]ll construction and grading activities would occur outside of the jurisdictional boundaries of Thumbelina Creek, and no direct impacts are expected to occur. However, indirect impacts may occur from construction sediment transport from adjacent construction and grading activities. To ensure there are no indirect impacts to the drainage feature, Mitigation Measure Bio-07 Habitat Setback would require that the feature be fenced with silt fencing to protect the area from sediment transport, and that no development would occur within 100 feet from the top of the creek bank.

The MND does not provide science-based evidence that a 100-foot buffer is sufficient to prevent impacts to riparian habitat, Thumbelina Creek, and wildlife that may inhabit these areas. Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats (Sun and Narins 2005, Patricelli and Blickley 2006, Gillam and McCracken 2007, Slabbekoorn and Ripmeester 2008). Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cues (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely

Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 6 of 16

more on visual detection of predators when auditory cues may be masked by noise (Rabin et al. 2006, Quinn et al. 2017). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009) and cause increased stress that results in decreased immune responses (Kight and Swaddle 2011).

The adverse ecological effects of artificial night lighting on terrestrial and aquatic resources such as fish, birds, mammals, and plants are well documented (Johnson and Klemens 2005, Longcore and Rich 2016, Rich and Longcore 2006). Night lighting can disrupt the circadian rhythms of many wildlife species. Many species use photoperiod cues for communication (e.g., bird song; Miller 2006), determining when to begin foraging (Stone et al. 2009), behavior thermoregulation (Beiswenger 1977), and migration (Longcore and Rich 2004). Even aquatic species can be affected; migration of salmonids can be slowed or halted by the presence of artificial lighting (Tabor et al. 2004, Nightingale et al. 2006). Phototaxis, a phenomenon which results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it (Longcore and Rich 2004).

Evidence impact would be significant: Mitigation measures should be adequately discussed and the basis for setting a particular measure should be identified [CEQA Guidelines, § 15126.4(a)(1)(B)]. The MND does not provide enough information regarding the suitability of the buffer to facilitate meaningful public review and comment on the appropriateness of this measure. Therefore, it is unclear how the mitigation strategy would be developed in order to reduce impacts to biological resources to less than significant. Additionally, the Project may have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS). Impacts to wildlife could result from increased anthropogenic presence which includes increased noise disturbances, light disturbances, human activity, and dust. All of these direct and indirect impacts should be addressed in the mitigation strategy and included in the environmental document for the Project.

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #2: The MND should be amended to provide a biological, science-based justification as to the chosen buffer(s) distance and prescribe larger buffers if appropriate. Buffers should be determined based upon the results of species surveys; species' sensitivity to noise, vibration, and general disturbance; current site conditions (screening vegetation, terrain, etc.); ambient levels of human activity; Project-related construction activities; and other features.

Comment #3: Tree Diseases, Pests, and Pathogens

Issue: The Project will remove trees and potentially spread material infected with invasive tree diseases, pests, and pathogens.

Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 7 of 16

Specific impacts: Project activities may spread invasive tree diseases, pests, and pathogens into areas not currently exposed to these stressors. This could result in expediting the loss of native trees and plant communities. Loss of trees from Project activities may result in loss of foraging and perching habitat for small mammals, birds, and raptors.

Why impacts would occur: The Project may remove trees that could host diseases and pests. One such pathogen is sudden oak death. Sudden oak death has become the most common cause of mortality of oak (*Quercus* genus) and other native trees (Phytosphere 2015). Mortality rates of oak trees are greater than 50 percent in some areas impacted by sudden oak death (Phytosphere 2012). Tree dieback can have cascading impacts on the habitat and ecosystem, particularly avian distribution and abundance (Monahan and Koenig 2006). Another pest is the polyphagous shot hole borer, which hosts on many native trees species that include box elder (*Acer negundo*), California sycamore (*Platanus racemosa*), willows (*Salix* genus), oaks, cottonwoods (*Populus* sp.), and alders (*Alnus* sp.) (Calinvasives 2021). Diseases such as sudden oak death can spread via equipment and transport of infected material. These fragments can be spread to new locations if equipment and tools are not disinfected or cleaned before moving to the next work location. Infected material that is transported off site for disposal may expose trees and plant communities to pest and disease. This could result in expediting the loss of oak woodlands, and other native trees and plant communities within and adjacent to a Project site.

Evidence impacts would be significant: The Project may have a substantial adverse effect on sensitive natural communities identified in local or regional plans, policies, and regulations or by the CDFW. The Project may result in a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW that are dependent on woodlands susceptible to invasive tree diseases, pests, and pathogens.

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #3: Prior to tree removal, a certified arborist should evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013). If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist should prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a Project site without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures. If possible, all tree material, especially infected tree material, should be left on site. The

Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 8 of 16

material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.

COMMENT #4: Impacts to Nesting Birds

Issue: The Project may impact nesting birds on site.

Specific impact: Direct impacts to nesting birds on site could occur as a result of Project activities, including grading, ground disturbance, and vegetation clearing.

Why impact would occur: Per the MND, there is suitable habitat on site for nesting birds. Mitigation Measure (MM) BIO-23 states that if construction must occur within the avian nesting season, a nesting bird pre-construction survey will be conducted within seven days prior to initiation of ground disturbance and/or vegetation removal. This timeline is not appropriate to avoid impacts, as it leaves enough time for a nest to become established between the time a survey is completed and when vegetation removal begins.

Evidence impact may be significant: Evidence impact would be significant: Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #3: Nesting Birds: CDFW recommends that MM BIO-23 be modified as follows: (suggestions in strikethrough and **bold**)

“If construction must begin within the nesting season, then the pre-construction nesting bird survey shall be conducted no more than ~~one week (7 days)~~ **three days** prior to commencement of vegetation removal, grading, or other construction activities.”

Additional Recommendations

Data

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Special status species information should be submitted to the CNDDDB by completing the [Online Field Survey Form](#) (CDFW 2024f). To submit information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and](#)

Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 9 of 16

[Releve Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2024g). The County should ensure all pertinent data, such as locations of special status species, have been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting the Project's environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The County should provide CDFW with confirmation of data submittal.


Filing Fees

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

Conclusion

We appreciate the opportunity to comment on the Project to assist the County in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the County has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at (562) 292-6821 or by email at Andrew.Valand@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Victoria Tang
Environmental Program Manager
South Coast Region

EC: California Department of Fish and Wildlife
Jennifer Turner – Senior Environmental Scientist (Supervisory)
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Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 10 of 16

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Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 11 of 16

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Jacquelynn Ybarra
 County of Santa Barbara – Planning and Development
 August 26, 2024
 Page 12 of 16

Attachment A: Draft Mitigation and Monitoring Reporting Plan

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

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-1 – Jurisdictional Delineation	<p>The Project shall include an assessment of direct and indirect impacts to Thumbelina Creek. CDFW recommends the MND include an analysis of potential impacts on biological resources resulting from the proposed runoff. The analysis should discuss changes in hydrology and hydraulics using the following considerations:</p> <ol style="list-style-type: none"> 1. under pre-project (i.e., baseline) conditions, the volume of runoff from the Project area, including sediment and pollutant loads; 2. under proposed Project conditions, any potential changes to the amount of runoff from the Project site and how the proposed bio-swales or bio-filters will reduce the level of pollutants entering the River to less than significant; and, 3. an analysis of potential Project-related changes to Thumbelina Creek. This includes water depth 	<p>Prior to Project-related ground-disturbing activities and vegetation removal</p>	<p>Project Applicant/ County of Santa Barbara</p>

Jacquelynn Ybarra
 County of Santa Barbara – Planning and Development
 August 26, 2024
 Page 13 of 16

	(percent change), wetted perimeter (acres gained/lost), and velocity (percent change).		
<p>MM-BIO-2 – LSA Notification</p>	<p>If Project activities will substantially adversely affect fish and wildlife species, the Project shall notify CDFW pursuant to Fish and Game Code 1602 and obtain LSA authorization from CDFW prior to initiating activities that could affect streambed resources. The County shall include a requirement to comply with mitigation measures detailed in any LSA authorization issued by CDFW. The County shall also include a requirement to provide compensatory mitigation for any impacted stream and associated natural community acceptable to CDFW. Please visit CDFW’s Lake and Streambed Alteration Program webpage for more information (CDFW 2024a).</p>	<p>Prior to Project-related ground-disturbing activities and vegetation removal</p>	<p>Project Applicant/ County of Santa Barbara</p>

Jacquelynn Ybarra
 County of Santa Barbara – Planning and Development
 August 26, 2024
 Page 14 of 16

<p>MM-BIO-3 – Nesting Bird Surveys</p>	<p>If construction must begin within the nesting season, then the pre-construction nesting bird survey shall be conducted no more than one week (7 days) three days prior to commencement of vegetation removal, grading, or other construction activities.</p>	<p>Prior to Project-related ground-disturbing activities and vegetation removal</p>	<p>Project Applicant/ County of Santa Barbara</p>
<p>REC-1 – CEQA Requirements</p>	<p>CDFW’s issuance of an LSA Agreement 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 lead agency/project applicant for the project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 <i>et seq.</i> and/or under CEQA, a project’s 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 Agreement. To compensate for any on and off-site impacts to aquatic and riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures; avoidance of resources; protective measures for downstream resources; on and/or off-site habitat creation; enhancement or restoration; and/or protection and management of mitigation lands in perpetuity shall be of adequate size to accommodate the spread of roots laterally in perpetuity.</p>	<p>Prior to Project-related ground-disturbing activities and vegetation removal</p>	<p>Project Applicant/ County of Santa Barbara</p>

Jacquelynn Ybarra
 County of Santa Barbara – Planning and Development
 August 26, 2024
 Page 15 of 16

<p>REC-2 – Buffer Zone</p>	<p>The MND should be amended to provide a biological, science-based justification as to the chosen buffer(s) distance and prescribe larger buffers if appropriate. Buffers should be determined based upon the results of species surveys; species’ sensitivity to noise, vibration, and general disturbance; current site conditions (screening vegetation, terrain, etc.); ambient levels of human activity; Project-related construction activities; and other features.</p>	<p>Prior to Project-related ground-disturbing activities and vegetation removal</p>	<p>County of Santa Barbara</p>
<p>REC-3 – Tree Pathogens</p>	<p>Prior to tree removal, a certified arborist should evaluate trees for infectious tree diseases including but not limited to: sudden oak death (<i>Phytophthora ramorum</i>), thousand canker fungus (<i>Geosmithia morbida</i>), polyphagous shot hole borer (<i>Euwallacea</i> spp.), and goldspotted oak borer (<i>Agrilus auroguttatus</i>) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013). If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist should prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a Project site without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures. If possible, all tree material, especially infected tree material, should be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent</p>	<p>Prior to Project-related ground-disturbing activities and vegetation removal</p>	<p>Project Applicant/ County of Santa Barbara</p>

Jacquelynn Ybarra
County of Santa Barbara – Planning and Development
August 26, 2024
Page 16 of 16

	introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.		
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