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June 29, 2021

June 29 2021

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STATE CLEARINGHOUSE

Subject: Comments on the Draft Revised EIR Heritage Ridge Residential Project, SCH #2015041014, Santa Barbara County

Dear Ms. Chang:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Revised Environmental Impact Report (DEIR) for the Heritage Ridge Residential Project (Project). The City of Goleta (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 is located north of Camino Vista and east of South Los Carneros Road in the City of Goleta, in Santa Barbara County. Union Pacific Railroad tracks are located approximately 50 feet from the site's northern property line. United States Highway 101 southbound freeway on-ramp from South Los Carneros Road is immediately north of the railroad tracks, Calle Koral and South Los Carneros Road are located west of the Project site.

Project Description/Objectives: The Heritage Ridge Residential Project involves a Vesting Tentative Map to merge 13 existing lots into three-lots for residential use and one lot for a two-acre public park. A Development Plan is proposed for 332 residential apartment units in ten buildings, as well as two recreational buildings. The Project also includes an amendment to the General Plan that would revise Figure 3-5 of the Open Space Element and Figure 4-1 of the Conservation Element to remove an Environmentally Sensitive Habitat Area designation of Coastal Sage Scrub that does not occur on the property.

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: Wildlife Movement

Issue: CDFW is concerned the proposed 25-40-foot-wide wildlife movement corridor is not adequate in size and constitutes an impact to a known wildlife movement corridor, as identified by Conservation Biology Institute, (Figure 1).

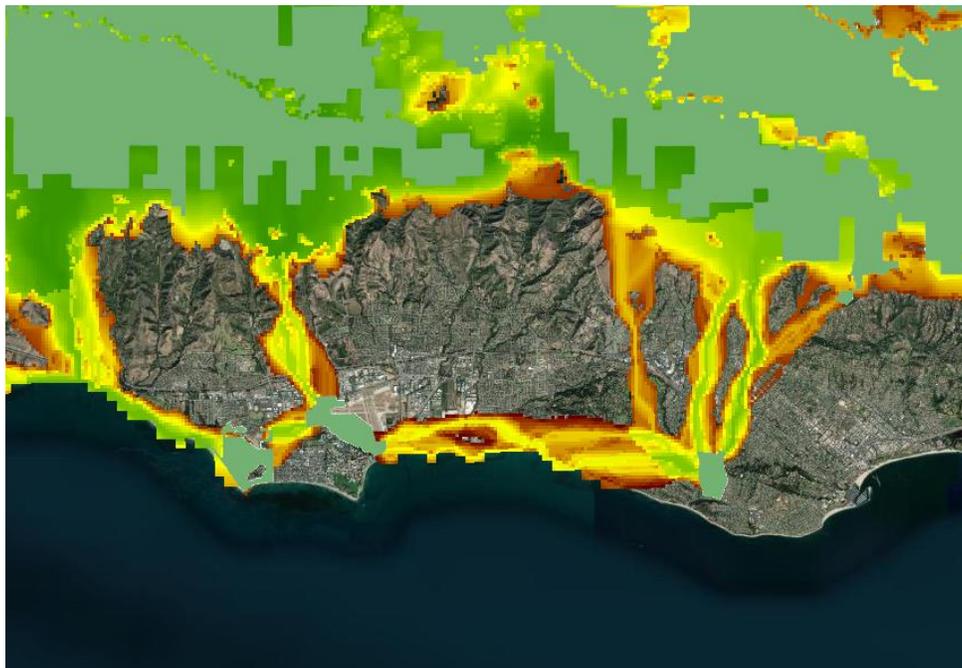


Figure 1. Local wildlife corridors of the Santa Barbara Coast, Conservation Biology Institute, 2019.

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Specific impact: The Project as proposed may impact wildlife populations by increasing human presence, traffic, noise, air pollutants and dust, artificial lighting, and will significantly and permanently reduce the width of the existing wildlife corridor.

Why impact would occur: The DEIR study found evidence of a wildlife linkage between the Santa Ynez Mountain foothills and the Los Carneros Wetlands through the Heritage Ridge Project site. The Los Carneros Wetland is a locally important property that includes freshwater-to-estuarine transitional habitat at the northern edge of the Goleta Slough. This on-site wildlife linkage is important for small- (raccoon, striped skunk) and medium- (coyote and bobcat) sized mammal species that use the wetlands and foothills to hunt, seek shelter, breed, and conduct other normal behaviors important for their survival, especially within the wilderness-urban interface.

The Los Carneros Wetland is upstream from and connected to the Goleta Slough through a small culvert traversing north-south beneath Hollister Road.

The DEIR mentions a 25-40-foot-wide wildlife movement corridor will be left between a sound wall and S. Los Carneros Road to allow for movement of mammals and other wildlife species between the Santa Ynez Mountain foothills and Los Carneros Wetland to the south.

The functional width of usable linkages should be described and maintained outside of the zone of influence of edge effect. The scientifically accepted minimum width for a functioning wildlife linkage is 1000 feet from any human disturbance or uses, including edge effects (Monica, 2003). The effective corridor width is the minimum spatial dimension needed to mitigate human influence on animal movement through the corridor (Ford et al., 2020). The current site starts at 1,000 feet wide at the northern boundary and narrows to 400 feet at the southern boundary. CDFW is concerned that 25-40 feet is not adequate to ensure the continued, unimpacted use of this corridor by the species the DEIR identifies as currently relying on it. CDFW is also concerned the DEIR conclusion that the 16% increase in traffic from the Project would not affect wildlife as the increase would be “during daytime hours when wildlife is least active”. The Federal Highway Administration Research and Technology Report (FHWA-HRT-08-034) states wildlife vehicle collisions are most prevalent in the early morning (5-9am) and at evening (4-12pm), which is when traffic volume would be significantly increased during commuting times. CDFW is concerned the DEIR does not cumulatively include the increase in traffic from recent, adjacent Projects in this analysis.

Evidence impact would be significant: The cumulative impacts from previous projects have developed the immediate area, leaving the Project site as the only north/south access to the Los Carneros Wetlands and two creeks as the main corridors for north south wildlife movement to Goleta Slough. Poorly designed corridors can act as populations sinks, because the large amount of edge exposes animals to predation from matrix dwellers and competition from generalist species (Hess and Fischer, 2001). CDFW is concerned that the current design of a 25-foot-wide corridor between a sound wall and a busy street is not adequate to ensure continued use of this corridor by wildlife. CDFW is concerned pushing this corridor between a sound wall and a road will result in increased death as roads create noise and vibration that interfere with ability of reptiles, birds, and mammals to communicate, detect prey, or avoid predators.

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Some reptiles sense ground-transmitted vibrations through their jaw (Heatherington, 2005) and are repelled even from low-speed 2-lane roads, resulting in reduced species richness (Findlay and Houlihan, 1997). Increased numbers of dogs, cats, and other pets can act as subsidized predators, killing millions of wild animals each year (Courchamp and Sugihara, 1999) (May and Norton, 1996). Artificial night lighting, which can impair the ability of nocturnal animals to navigate through a corridor (Beier, 2006) and has been implicated in decline of reptile populations (Perry and Fisher, 2006).

Recommendation #1: CDFW recommends a scientifically defensible wildlife corridor width be required. CDFW recommends keeping the minimum width of 400 feet that the property currently provides for wildlife use and movement. Continued monitoring of any Project wildlife corridor should be a condition of approval to ensure any approved design continues to provide adequate wildlife movement.

Recommendation #2: Human use of wildlife movement corridor should be restricted away from structures/paths intended for wildlife movement.

Recommendation #3: Install wildlife-proof trash and recycling receptacles. Require trash companies servicing this area to provide all residents, including individually owned homes. wildlife-proof trash cans.

Comment 2: Mitigation for White-tailed Kite Foraging Habitat

Issue: Status of white-tailed kite (*Elanus leucurus*) nesting at Los Carneros Wetland is not disclosed. The use of the site for foraging and/or roosting of white-tailed kite is not disclosed.

Specific Impact: Project impacts would potentially reduce the number and/or restrict the range of the white-tailed kite or contribute to the continued abandonment of a nesting site and/or loss of significant foraging habitat for a given nest territory. This would result in “take” as defined under CEQA.

Why Impact Would Occur: The opportunity for white-tailed kites to successfully nest at Los Carneros Wetland is heavily dependent on foraging habitat within 0.5 miles. The DEIR does not adequately address the cumulative and ongoing reductions in foraging habitat and consider how these habitat losses reduce number of white-tailed kites that can locally be supported.

The DEIR states white-tailed kites were documented nesting at Los Carneros Wetland in 1990, but presence/absence data for nesting kites is lacking for the wetland for most years since 1990. The DEIR also concludes that the possibility of kites returning to roost or nest at the Los Carneros Wetland cannot be discounted as the site contains numerous prey species and foraging value with large trees located adjacent to the Project site. CDFW is concerned that the survey data to disclose the local status of white-tailed kites to support the conclusion of the DEIR that removal of 17.4 acres of suitable foraging habitat, well within the range of average territory sizes, would not significantly affect white-tailed kites.

Evidence Impact would be significant: CDFW records indicate white-tailed kites can roost in saltgrass and non-native grassland communities, which are present on the site. White-tailed kite is a fully protected species. CDFW cannot authorize the take of any fully protected species as defined by State law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take except for

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collecting those species for necessary scientific research and relocation of the bird species for protection of livestock (Fish & G. Code, §§ 3511, 4700, 5050, 5515). Take of any species designated as fully protected under the Fish and Game Code is prohibited.

In order to analyze if a project may have a significant effect on the environment, the Project related impacts, including protocol survey results for CEQA-rare, California Species of Special Concern (SSC), or CESA-listed species (including fully protected species) that could occur in the Project footprint need to be disclosed. This disclosure 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).

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.”

Impacts to special status wildlife species 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 special status wildlife 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 United States Fish and Wildlife Service (USFWS).

Recommendation #1: The DIER should include survey results to determine if white-tailed kites are currently utilizing the Project site for foraging.

Mitigation Measure #1: Permanent impacts to foraging habitat for white-tailed kite should be offset by setting aside replacement habitat to be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012), which amended Government Code sections 65965-65968. Under Government Code section 65967(c), the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A white-tailed kite mitigation plan should include measures to protect the targeted habitat values in perpetuity from direct and indirect negative impacts. Issues that should be addressed include, but are not limited to, restrictions on access; proposed land dedications; control of illegal dumping; water pollution; and increased human intrusion. A conservation easement and endowment funds should be fully acquired, established, transferred, or otherwise executed prior to implementing Project related ground disturbing activities.

Comment 3: Mitigation for Sensitive Vegetation Communities

Issue: The DEIR does not include CDFW sensitive vegetation community alliance information and only considers the county definition of a native grassland.

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Specific Impact: 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.

Why Impact Would Occur: CDFW considers *Nassella* spp. Alliance, ranked S3, a sensitive vegetation community. *Atriplex lentiformis* Shrubland (Quailbush Scrub) Alliance is ranked an S4 community by CDFW and given the loss of this vegetation community in the coastal Goleta area, CDFW considers this S4 species as a locally sensitive vegetation community. *Baccharis pilularis* (Coyote brush scrub) Alliance is ranked S5 by CDFW but given the local losses of this vegetation community in the coastal Goleta area, CDFW considers this a locally sensitive vegetation community.

Sensitive vegetation communities are defined and have membership requirements, as defined in the Manual of California Vegetation. The DEIR should consider the vegetation as present, even if it was planted as part of mitigation for another project. The presence of these vegetation communities should be acknowledged if they meet the membership requirements. The quality of the vegetation community is considered when mitigation ratios are considered, but the vegetation either meets the membership criteria, or it doesn't. If it meets the membership criteria, the vegetation communities should be mitigated to ensure no net loss of these locally important vegetation communities.

The DEIR states the on-site native grassland must meet a 10% relative cover requirement to be considered a native grassland, however CDFW's alliance-based classification has several different criteria that can be met including: 1) a 5% absolute cover of *Nassella pulchra* as membership criteria if it is co-dominant, or, 2) *Nassella pulchra* or if other *Nassella* sp. has a clear presence in the stand with > 5% absolute cover in the herbaceous layer.

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."

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.

Evidence Impact would be significant: Inadequate avoidance, minimization, and mitigation measures for impacts to these CEQA locally sensitive 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 should be mitigated at a 4:1 ratio and impacts to the S4 and S5 communities be mitigated at a 2:1 ratio due to the overall decline of coastal bluff/scrub habitats region wide.

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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).

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.

Comment #4: Lake Streambed Alteration (LSA) Agreement

Issue #1: Potential impacts to Los Carneros Creek and the new culvert under the Union Pacific Railroad are not clear.

Specific Impacts: The Project may remove or otherwise alter drainage channels and potentially affect the usability of a wildlife undercrossing under the Union Pacific Railroad tracks, as well as the function of Los Carneros Wetland. The Project may also impact watershed function. The proximity of the carports to drainage features might constitute an impact to drainage features regulated by CDFW.

Why impacts would occur: The Project may impact surface and subsurface water flow beyond the drainage channels identified in the DEIR. The Project may divert surface drainage or otherwise alter the existing drainage pattern of the Project site.

Evidence impacts would be significant: The Project may substantially adversely affect the existing stream or 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.

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Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: CDFW has concluded that the Project may result in the alteration of streams. 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 2020d).

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 City of Glendale 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.

Recommendation #1: As part of the LSAA Notification process, CDFW requests a map showing features potentially subject to CDFW’s broad regulatory authority over streams. CDFW also requests a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions.

Recommendation #2: CDFW recommends that this Project and similar development projects use permeable pavement to permit natural water filtration and percolation into groundwater basin. CDFW also recommends using native plants for landscaping to reduce water consumption and application of pesticides and herbicides that may seep into the groundwater table (see Additional Recommendation #3). Pesticides and herbicides may be transported via runoff into adjacent wetlands, intermittent or ephemeral streams.

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).

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Conclusion

CDFW appreciates the opportunity to comment on the DEIR to assist the City of Goleta 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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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

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References

Beier, P. 2006. Effects of artificial night lighting on terrestrial mammals. Pages 19-42 In C. Rich and T. Longcore, editors, Ecological consequences of artificial night lighting. Island Press, Covelo, California.

Bond, Monica. 2003 . Principles of Wildlife Corridor Design. Center for Biological Diversity. Accessed at: <http://www.biologicaldiversity.org/publications/papers/wild-corridors.pdf>.

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.

Courchamp, F., G. Sugihara. 1999 .Biological control of introduced predator populations to protect native island species from extinction. Ecological Applications, 9(10), pp.112-123

Dixon, P. 2018. Assessment of Topsoil Salvage and Seed Augmentation in the Restoration of Coastal Sage Scrub on Santa Catalina Island, California. Western North American Naturalist, 78(4), 711-721.

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.

Hess, G. R., and R. A. Fischer. 2001. Communicating clearly about conservation corridors. *Landscape and Urban Planning* 55: 195–208.

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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.

Fisher, R. A. and J. C. Fischenich. 2000. Design recommendations for riparian corridors and vegetated buffer strips. U.S. Army Engineer Research and Development Center. ERDC-TN-EMRRPSR-24. Available online

May, S. A., and T. W. Norton. 1996. Influence of fragmentation and disturbance on the potential impact of feral predators on native fauna in Australian forest ecosystems. *Wildlife Research* 15:387–400.

Perry, G., and R.N. Fisher. 2006. Night Lights and Reptiles: Observed and Potential Effects. Pp 169-191 In C. Rich and T. Longcore, editors, *Ecological consequences of artificial night lighting*. Island Press, Covelo, California.

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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-Wildlife Corridor	CDFW recommends a scientifically defensible wildlife corridor width be required. CDFW recommends keeping the minimum width of 400 feet that the property currently provides for wildlife use and movement. Continued monitoring of any Project wildlife corridor should be a condition of approval to ensure any approved design continues to provide adequate wildlife movement.	Prior to Finalizing the EIR	City of Goleta
REC-Bio-2-CEQA-Wildlife Corridor	Human use of wildlife movement corridor should be restricted away from structures/paths intended for wildlife movement.	Prior to Finalizing the EIR	City of Goleta
REC-Bio-3-CEQA-Wildlife Corridor	Install wildlife-proof trash and recycling receptacles. Require trash companies servicing this area to provide all residents, including individually owned homes. wildlife-proof trash cans.	Prior to Finalizing the EIR	City of Goleta
REC-Bio-4-White Tailed Kite	The DIER should include survey results to determine if white-tailed kites are currently utilizing the Project site for foraging.	Prior to Finalizing the EIR	City of Goleta
MM-Bio-1-CEQA- White Tailed Kite	Permanent impacts to foraging habitat for white-tailed kite should be offset by setting aside replacement habitat to be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012), which amended Government Code sections 65965-65968. Under Government Code section 65967(c), the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A white-tailed kite mitigation plan should include measures to protect the targeted habitat values in perpetuity from direct and indirect negative impacts. Issues that should be addressed include, but are not limited to, restrictions on access; proposed land dedications; control of illegal dumping; water pollution; and increased human intrusion. A conservation easement and endowment funds should be fully acquired, established, transferred, or otherwise executed prior to implementing Project related ground disturbing activities.	Prior to Finalizing the EIR	City of Goleta

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<p>MM-Bio-2-CEQA-Sensitive Vegetation Communities</p>	<p>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 should be mitigated at a 4:1 ratio and impacts to the S4 and S5 communities be mitigate at a 2:1 ratio due to the overall decline of coastal bluff/scrub habitats region wide.</p> <p>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).</p>	<p>Prior to Finalizing the EIR</p>	<p>City of Goleta</p>
<p>MM-Bio-3-CEQA-Sensitive Vegetation Communities</p>	<p>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.</p> <p>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</p>	<p>Prior to Finalizing the EIR</p>	<p>City of Goleta</p>

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	CEQA-rare plant species does not appear to provide any value to mitigate impacts to the plant.		
MM-Bio-4-CEQA-Lake and Streambed	As part of the LSAA Notification process, CDFW requests a map showing features potentially subject to CDFW's broad regulatory authority over streams. CDFW also requests a hydrological evaluation of the 200, 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. Germplasm designated for long-term storage to provide protection against extinction and as a source material for future restoration and recovery.	Prior to Finalizing the EIR	City of Goleta
MM-Bio-5-CEQA-Lake and Streambed	CDFW recommends that this Project and similar development projects use permeable pavement to permit natural water filtration and percolation into groundwater basin. CDFW also recommends using native plants for landscaping to reduce water consumption and application of pesticides and herbicides that may seep into the groundwater table (see Additional Recommendation #3). Pesticides and herbicides may be transported via runoff into adjacent wetlands, intermittent or ephemeral streams.	Prior to Finalizing the EIR	City of Goleta