3.5 BIOLOGICAL RESOURCES

The following discussion describes the existing biological resources in the project area and analyzes potential effects resulting from development of the project.

3.5.1 Environmental Setting

The project area is approximately one-half square mile in size. Most of the project area was historically dominated by grasses and forbs. It was developed on a large scale with apartments and businesses with associated streets and parking lots in the 1960's and 1970's. Some of the few remaining undeveloped areas were under agricultural development at that time. Existing biological resources are limited to plants and wildlife that occur in unpaved, urban areas, vernal pools and associated riparian areas, the man-made Anisq'Oyo' Park, Estero Park, vacant Pacific Ocean bluff top open space, and eucalyptus tree windrows along the western and eastern project area boundaries.

The following description of the biological resources in the project area is primarily derived from information presented in the Final Camino Corto Park and Open Space Master Plan (Santa Barbara County 1996), Biological Field Research for the IV Master Plan EIR (Santa Barbara County 2003), IV Master Plan Project Overview and Scoping summary (Santa Barbara County 2004), Maintenance Plan: Del Sol Vernal Pool Reserve and Open Space and Camino Corto Open Space (Haupt 1991), and a wetland delineation report for Anisq'Oyo' Park (SAIC 2002). The following discussion provides scientific names for all plants and non-avian wildlife species discussed in text. Plant names follow the *Jepson Manual for Higher Plants of California* (Hickman 1993). Bird names follow standardized English nomenclature used in the American Ornithologist's Union (AOU) *Checklist of North American Birds*.

Vegetation and Wildlife Habitats

Ornamental Landscaping

Most of the project area is developed. Non-park areas (either residential or commercial land uses) are largely hardscape including buildings, roads, parking lots, and sidewalks. A few areas have small lawns or limited landscaping. Trees scattered along roads or in yards generally consist of non-native species including Peruvian pepper (*Schinus molle*) and various species of eucalyptus (*Eucalyptus* spp.). There are several eucalyptus tree windrows at the eastern and western ends of the project area. A few native coast live oaks (*Quercus agrifolia*) are present along Estero Road and other various locations in the project area; the Isla Vista Recreation and Park District (IVRPD) has planted several areas surrounding Estero Park with native western sycamore and coast live oak.

Environmentally Sensitive Habitat

Three Environmentally Sensitive Habitat Areas (ESHA) have been identified by the County within Isla Vista: Anisq'Oyo' Park ~~(2004)~~; the Camino Corto Open Space ~~(1990)~~; and the Del Sol Open Space and Vernal Pool Reserve ~~(1990)~~. Anisq'Oyo' Park is planted with a

variety of native and non-native landscape trees and shrubs and includes a large man-made pond with associated wetland area. In the southwest corner of the park, a small area has been planted with native species including coast live oak, toyon (*Heteromeles arbutifolia*), and California rose (*Rosa californica*). Trees near the pond include arroyo willow (Salix lasiolepis), Fremont cottonwood (*Populus fremontii*), black cottonwood (*P. balsamifera* ssp. *trichocarpa*), and western sycamore (*Platanus racemosa*). The willows are located within the fenced-off area, whereas the cottonwoods are located at the top edge of the bank. Most of the sycamores have been planted within 20 feet of the pond. In addition to the native trees in the park, other vegetation along the banks of the pond includes a combination of non-native landscape species and native plants including lemonade berry (*Rhus integrifolia*) and elderberry (*Sambucus mexicana*). Some of the native species were planted while others colonized the area through natural processes.

The Camino Corto Open Space and Del Sol Open Space and Vernal Pool Reserve are discussed below.

Grasslands

Many vacant lots and numerous parks located in the project area are dominated by non-native grassland. The habitat value of the grassland is inversely proportional to the abundance of non-native invasive species and prior ground disturbance. Most of these areas are dominated by non-native annual grasses and forbs such as ripgut brome (*Bromus diandrus*), slender oats (*Avena barbata*), wild oats (*Avena fatua*), rye (*Lolium multiflorum*), vetch (*Vicia sativa*), and bur-clover (*Medicago polymorpha*). In some areas, particularly where there are no active control measures, non-native annual and perennial invasive species including fennel (*Foeniculum vulgare*), wild radish (*Raphanus sativa*), and black mustard (*Brassica nigra*) have colonized non-native grasslands.

Some grassland areas are transitional to vernal pools and other wetlands. These occasionally contain native grassland species such as meadow barely (*Hordeum brachyantherum*) and purple needlegrass (*Nassella pulchra*). Many grassland communities support scattered individuals of coyote brush (*Baccharis pilularis*).

Wetland/ Riparian Areas and Vernal Pools

Some vernal pools and other wetland and riparian areas are present within the project area. Vernal pools are seasonally flooded wetlands that host a variety of plant species found only in this particular habitat and are uncommon throughout California because they form only under limited environmental conditions. The presence of vernal pools requires a shallow depression formed over relatively impermeable soil, which increases their vulnerability because these conditions are ideal for agricultural and other types of development. Vernal pool plant species typically germinate when the ponds are filled with water and grow and flower as the ponds dry. The area surrounding a vernal pool is essential to the sustainability of the pool because it acts as the drainage area that provides runoff into the pool. During especially wet years, runoff gathering in vernal pools can sometimes merge to form even bigger ponds.

Vernal flats are similar to vernal pools but have a smaller drainage area and only hold water in some years. They generally contain species typical of vernal pools during especially wet years, and upland species in dry years. Vernal pool species do not germinate in vernal flats in dry years.

Vernal pools are located at Del Sol Open Space and at Camino Corto Open Space. The Del Sol Open Space is located on the southeast corner of El Colegio Road and Camino Corto Road, encompassing 11.8 acres and containing 15 separate vernal pools. The Camino Corto Open Space is located at the southwest corner of the same intersection and covers 24 acres, including 4 acres of vernal wetland and one acre of riparian and freshwater wetland. In addition, several vernal pools and potential vernal pools are identified at various locations in Isla Vista, including along Del Playa Drive, Sabado Tarde Road, Camino Corto, and Camino Lindo (Santa Barbara County 1990). Two project applications requiring an EIR have been submitted and are in process for adjacent parcels which have potential vernal pools. These parcels are located on the 6800 block of Del Playa. ~~(See figure…..)~~

The Camino Corto Open Space, a vernal pool dominated by brown-headed rush (*Juncus phaeocephalus*), was once part of a large wetland that was associated with the southerly extent of the Goleta Slough. An arroyo at Camino Corto Open Space also drains into the north finger of Devereux Slough. It is dominated by wetland and riparian species including willows (*Salix lasiolepis*), brown-headed rush, and alta fescue (*Festuca arundinacea*).

Vernal pools at Del Sol Vernal Pools and Open Space and at Camino Corto Open Space are considered the remnants of a much large number that were probably abundant in the Isla Vista area prior to development in the 1960's and 1970's. The IVPRD manages public access to both Open Space areas, providing raised paths for recreational foot traffic, garbage collection, and establishing barriers to off-road vehicle use to reduce degradation of the resources.

Unlike the natural vernal pools described above, Anisq'Oyo' Park contains a large man-made pond created in the 1970's when much of residential and commercial development in Isla Vista was underway or recently completed. The pond is filled by stormwater runoff directly from Embarcadero del Norte and Embarcadero del Mar during the winter rainy season. However, during the dry season, the water level in the pond gradually declines. As no natural source of water is present in the vicinity of the feature, the IVRPD must artificially fill the pond during the dry summer and fall months. The artificial pond supports California bulrushes (*Scirpus californicus*) at its margins and has open water in the deeper regions, which contributes to its status as a wetland. The habitat, however, is sparse as it is confined to a narrow margin around the pond. The small number of trees and large shrubs in the transition area between the wetland and upland vegetation provide limited cover for wildlife. Stormwater runoff contains elevated levels of fertilizer nutrients, as well as human and pet wastes, that result in anaerobic conditions promoting algae and bulrush growth that further compromise the integrity of the habitat. Therefore, though it supports wetland vegetation, the fact that the pond was artificially created and is maintained seasonally by outside water sources distinguishes it from other natural ESHAs within the project area.

Wildlife

Animals associated with urban areas, open grassland, vernal pools, and disturbed habitats are known to or are expected to inhabit the project area. The value of these habitats to wildlife species is generally limited due to the extensive presence of people and their pets. The vernal pool complexes on the western portion of the project area provide an especially important and limited resource to many wildlife species in the area. Although most of the grassland habitat within the project area is substantially degraded by various human activities, it still provides suitable habitat for several common wildlife species. "Common" wildlife species are considered those that are widespread and are present throughout the project area on more than just rare occasions.

Most of the project area consists of developed areas, which provide habitat for wildlife typically adapted to high levels of human presence. Common bird species that are known to be present in the project area include: house sparrow; American crow; northern mockingbird; mourning dove; rock dove; house finch; Say's phoebe; Anna's hummingbird; and European starling.

Open space areas provide habitat for a wider range of wildlife species. These areas are also important in providing temporary foraging habitat for wide-ranging species such as raccoon, and providing cover and food for animals traveling between other undisturbed areas. The open space areas may support several species of raptors including American kestrels, white-tailed kites, red-shouldered hawks, and red-tailed hawks, as well as great horned owls and barn owls. The presence of open space areas in the vicinity is inviting to various mammal species that adapt to living with and near humans, such as: house mice (*Mus musculus*); raccoons (*Procyon lotor*); opossum (*Didelphis virginiana*); and striped skunk (*Mephitis mephitis*). Mammal species would be expected to forage in the developed areas, although some would also reside and forage in the open space and park areas.

Open space and park areas in the project area are likely to support reptile species such as gopher snake (*Pituophis melanoleucus*), southern alligator lizard (*Elgaria multicarinatus*), western fence lizard (*Sceloporus occidentalis*), and side-blotched lizard (*Uta stansburiana*). Some of the common mammal species would include rodents such as deer mice (*Peromyscus maniculatus*) and house mice, and other small mammals such as Audubon's cottontail (*Sylvilagus audubonii*), pocket gopher (*Thomomys bottae*), and California ground squirrel (*Spermophilus beecheyi*). Meadow voles (*Microtus californicus*) are often associated with aquatic habitats such as vernal pools. In turn, white-tailed kites are closely associated with voles, one of the kites' preferred prey items.

Though the trees are not native, eucalyptus tree windrows along the eastern and western end of the project area may provide nesting and roosting habitat for American crows and various raptors including red-tailed hawk, red-shouldered hawk, barn owl, and great-horned owl. For example, a pair of red-shouldered hawks were identified nesting in a eucalyptus tree within the western Estero Park area (Watershed Environmental 2004). Other species known to frequent the eucalyptus windrow trees throughout the project area include yellow-rumped warbler, California towhee, northern flicker, western scrub jay, Monarch butterfly and white-crowned sparrow.

Vernal pools provide resting places for local and migrating aquatic birds during the rainy season and when they are flooded, such as greater yellowlegs, western sandpiper, least sandpiper, mallard, great-blue heron, great egret, and snowy egret (Haupt 1991). In addition, there are many species of arthropods uniquely suited to vernal pool environments. Their eggs will only hatch when there is sufficient moisture, which prevents massive die-offs in very dry years. When the ponds fill, eggs hatch and arthropods multiply and lay eggs for the following wet season. The arthropods provide food for passing birds, and potentially for amphibians such as Pacific chorus frogs (*Pseudacris regilla*) and western toad (*Bufo boreas*). Vernal pools provide similar habitat to grasslands when they are not flooded.

The riparian habitat tributary to the north finger of Devereux Slough provides cover, shelter, and food for wildlife. Bird species expected to use this habitat include red-shouldered hawk, Cooper's hawk, barn owl, California towhee, black phoebe, song sparrow, and western scrub jay.

Other avian species that are expected to occur in the open grassland habitat include northern mockingbird, lesser goldfinch, horned lark, lark sparrow, and Brewer's blackbird. American kestrel, white-tailed kite, red-tailed hawk, and turkey vultures have all been observed foraging over the open habitat (SAIC n.d.).

Wetland vegetation within Anisq'Oyo' Park pond provides limited value for wildlife species. Wildlife habitat is limited by the narrow margin of wetland-associated plants around the pond, by the small number of trees and large shrubs that can provide cover, and intensity of human use in the vicinity. Mallard ducks have been observed at the pond. Other bird species that have been observed include kingfisher, egrets/herons, ducks, and an ibis. Mosquito fish (*Gambusia affinis*) are abundant in the water and Pacific chorus frogs are expected to use the water for breeding. Non-native species, including red-eared slider (a non-native turtle) and bullfrog (*Rana catesbiana*), have also been observed at the pond during preparation of this EIR.

The complex of vernal pools, wetlands, riparian areas, and open grasslands at the western and northern ends of the project area provide a connection between the Devereux watershed and the Goleta Slough watershed. This connection provides an important pathway for animals to travel from one area to another.

Sensitive Species

Table 3.5-1 provides a list of the state- and federally-listed threatened and endangered plants and wildlife, and other sensitive species found or expected to occur in the project vicinity. Species identified from sources listed below that may occur in the project area are protected under CEQA Guidelines Section 15380.

- California Natural Diversity Database (CDFG 2004).
- U. S. Fish and Wildlife Service (USFWS), Sacramento Fish and Wildlife Office, Plant and Animal Species of Concern List, Updated November (USFWS 2004).

- The California Fish and Game Code (contains prohibitions against taking or possession of certain species).

No state- or federally-listed species are known to occur in or use the habitats within the project boundary at present. However, the project area does provide suitable habitat for a variety of species that are state- and federally-listed or are California Species of Special Concern (CSC, Table 3.5-1). Contra Costa goldfields (*Lasthenia conjugens*), the one federally-listed, endangered plant species known from the project area, is apparently extirpated. Three additional CNPS list 1B species also are know to occur in the vicinity of Isla Vista. They include Coulter's saltbush (*Atriplex coulteri*), Southern tarplant (*Centromadia parryi* ssp. *australis)*, and Black-flowered figwort (*Scrophularia atrata*). Of these species, the southern tarplant may occur in the project area, and Coulter's saltbush and black-flowered figwort are considered unlikely to occur. No positive records for any sensitive bird species were recorded for the avian surveys conducted in 1991 (Haupt 1991). Also, there are no sensitive mammalian, reptile, or amphibian species reported in the project area. However, several raptor species with extensive foraging area are expected to occasionally use the open space area on the western portions of the project area, particularly given the eucalyptus windrows along the boundary that is available for roosting.

Only those species that have the potential to occur in the project area or have been reported in the project vicinity are included in the following discussion. The following species accounts provide the current listing status, the preferred habitat, species associations, current distribution, and factors threatening full recovery of the species.

Table 3.5-1 Sensitive Plant and Animal Species Potentially Present on or Adjacent to the Project Area

Scientific Name/ Common Name	*Status – Fed/ State/Other*	*Habitat and Description*	*Distribution in Project Area*
STATE OR FEDERALLY LISTED AND PROPOSED THREATENED OR ENDANGERED SPECIES			
PLANTS			
Lasthenia conjugens Contra Costa goldfields	E/-/1B	Occurs in vernal pools and in swales; blooms March to June.	An historical record for this species is present in a vernal flat on a bluff above the ocean (CNDDB 2004). However, it is thought to be extirpated.
OTHER SENSITIVE SPECIES			
PLANTS			
Atriplex coulteri Couter's saltbush	-/-/1B	Occurs on coastal bluff, scrub, and dunes and in alkaline low spots. Blooms March to September.	Occurs in Goleta and at UCSB, may occur in suitable habitat in project area.
Centromadia parryi ssp. *australis* Southern tarplant	--/--/1B	Margins of wetlands and grasslands; often in disturbed sites; blooms July to September.	This species is known from several sites in and around Isla Vista (CNDDB 2004).

Table 3.5-1 Sensitive Plant and Animal Species Potentially Present on or Adjacent to the project area (cont.)			
Scrophularia atrata Black-flowered figwort	--/--/1B	Sandy and diatomaceous earth areas in coastal scrub, chaparral, and riparian habitats; blooms April to July.	Known from 1 occurrence in the Devereux dunes. May be present in the project area, particularly in scrub or riparian vegetation.
WILDLIFE			
BIRDS			
Accipiter cooperii Cooper's hawk	--/CSC	Open grassland, chaparral, and oak woodland.	Suitable foraging habitat present.
Accipiter striatus Sharp-shinned hawk	--/CSC	Forages in open grassland, chaparral, and oak woodland.	Not observed in area, suitable foraging habitat present.
Athene cunicularia Western burrowing owl	FSC/CSC/ MNBMC	Open grassland.	No records in area, marginal wintering and foraging habitat present.
Charadius alexandrinus Western Snowy Plover	T-/CSC	Sandy beaches.	Known from Goleta Slough, Coal Oil Point; no suitable habitat in project area.
Elanus leucurus White-tailed kite	CSC/FP/ MNBMC	Open grassland, riparian and oak woodland.	Expected in open space areas, suitable foraging habitat present.
Eremophila alpestris California horned lark	--/CSC	Open grassland.	Likely to be present, suitable foraging and marginal breeding habitat present.
Lanius ludovicianus Loggerhead shrike	FSC/CSC/ MNBMC	Open grassland, chaparral, and oak woodland.	No records in area, marginal foraging habitat present.
Passerculus sandwichensis beldingi Belding's savannah sparrow	-/E	Tidal flat margins, nests in pickleweed plants	Haupt reports possible siting (1991), known from Goleta Slough; no suitable habitat in project area.
Rallus longirostris levipes Light-footed clapper rail	E/E	Dense pickle weed and cordgrass marshes with tidal influence.	Historically known from Goleta Slough; no Suitable habitat in project area.
INVERTEBRATES			
Coelus globosus Globose Dune Beetle	FSC/-	Foredunes and sand hummocks in coastal sand dunes, particularly beneath dune vegetation	Known from beach areas at Elwood and Haskells, not expected in project area

Table 3.5-1 Sensitive Plant and Animal Species Potentially Present on or Adjacent to the project area (cont.)			
Cicindela hirticolllis gravida Sandy Beach Tiger Beetle	FSC/-	Sand adjacent to non-brackish water	Observed at Coal Oil Point in 1979, suitable habitat not present in project area
Danaus plexippus Monarch butterfly	Local Concern	Open grassland, meadows, and wetlands with milkweed plants. Roosts in eucalyptus groves.	Individuals observed on site, no record of roost sites, marginal roost sites present.
Trionia imitator Mimic tryonia	-/-/-	Coastal lagoons, estuaries, and salt marshes in permanently flooded areas.	Known from the UCSB lagoon; no suitable habitat present in the project area.

Source: CNDDB 2004

Federal Status (determined by U. S. Fish and Wildlife Service):

E Endangered. In danger of extinction throughout all or a significant portion of its range.

T Threatened. Likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

FSC Federal Species of Concern, formerly List 2 Candidate Species (designation is not used by CNPS or CDFG). Species of Concern is an informal term used by some but not all U.S. Fish & Wildlife Service offices. Species of Concern receive no legal protection and the use of the term does not necessarily mean that the species will eventually be proposed for listing as a threatened or endangered species (USFWS, 2002)

MNBMC Migratory Nongame Birds of Management Concern

State Status (determined by California Department of Fish and Game):

E Endangered
T Threatened
CSC Species of Special Concern
FP Fully Protected

California Native Plant Society List (CNPS) List:

1B Plants considered rare or endangered in California and elsewhere
2 Plants considered rare or endangered in California but more common elsewhere.
3 Plants for which more information is needed.
4 Plants of limited distribution – a watch list.

Sensitive Plants

Contra Costa Goldfields (*Lasthenia conjugens*) (Federally listed as endangered, CNPS list 1B)

The Contra Costa goldfields generally occurs in somewhat meisic (wet) habitats such as vernal pools, swales, or low depressions. These habitats may be surrounded by scrub, woodland, or grassland. One observation for this species was recorded in the vicinity of Isla

Vista in 1973. It was in a depression in a grain field. It is since thought to be extirpated (eliminated from local presence) (CNDDB 2004).

Coulter's Saltbush (*Atriplex coulteri*) (CNPS list 1B)

Couter's saltbush grows on ocean bluff tops and ridges as well as low alkaline areas. It is known to occur at UCSB. Although there are no records for this species within the project area, there is a remote possibility it may be present on some bluff tops in Isla Vista.

Southern Tarplant (*Centromadia parryi* ssp. *australis)* (CNPS list 1B)

The southern tarplant occurs in disturbed areas, alkaline soils, and vernal pools near the coast. It is known to occur at several sites within the project area including the Camino Corto Open Space, the bluff top areas between Del Playa and the ocean, the margins of Devereux Slough, and UCSB lagoon. Because this species does well in disturbed habitats, the potential for it to occur in the project area is possible, particularly on the 30 undeveloped parcels in the project area.

Black-flowered Figwort (*Scrophularia atrata*) (CNPS list 1B)

The black-flowered figwort occurs primarily in diatomaceous shale and soils in the vicinity of Lompoc. A few localities are known from the Goleta area in sandy soils. These include one record by Pollard in 1958 within Devereux Dunes. It is unlikely to be present in the project area.

Sensitive Wildlife

White-Tailed Kite (*Elanus leucurus*) (California Fully Protected and Species of Local Concern)

The CDFG has designated white-tailed kites as a "Fully Protected" species. Fully Protected species may not be taken or possessed at any time and the CDFG does not issue licenses or permits for any take.

The white-tailed kite requires large open fields and relatively undisturbed oak woodland, grassland, riparian, or coastal sage scrub for successful breeding. Small mammals are the normal prey item of this species. Eggs are laid as early as mid-March and as late as the end of May. White-tailed kite habitat usually requires a stretch of riparian corridor in which to nest (particularly cottonwoods, but including eucalyptus, willows, and live oaks), and adjacent fields in which to hunt. Nests are usually well hidden in the tree canopy.

This species is known to roost and forage in the general area (Santa Barbara County 1990) and is expected to occasionally forage in the western portion of the project area. Roost sites are located in a lemon orchard off of Ward Drive and at More Mesa. Both sites are within three miles of the project area, and have records of use for several decades. Roost sites support kites that are known to forage up to seven or more miles from the roost (Waian 1973).

Western Snowy Plover (*Charadrius alexandrinus nivosus*) (Federally listed as threatened)

The Pacific Coast population of the western snowy plover was listed as threatened by the U.S. Fish and Wildlife Service (USFWS) in 1993. This population breeds from mid-March to mid-September mainly on coastal beaches from southern Washington State to southern Baja California, Mexico. The plover's preferred habitats are sand spits, dune-backed beaches, unvegetated beach strands, open areas around estuaries, and beaches at river mouths. Plover nest sites, which are shallow scrapes or depressions lined with small pebbles, shells and plant debris, are usually in flat open sandy areas where vegetation or driftwood is absent or sparse. In winter, plovers are found on many of the beaches used for nesting as well as some beaches where they do not nest.

In 1999, the USFWS formally designated 28 areas along the coast of California, Oregon and Washington as critical habitat for the plover. Critical habitat is defined as specific areas that have physical or biological features essential to the conservation of the species and that may require special management consideration or protection.

Suitable habitat for this species is not known in the project area and the plover is not expected to breed or roost here. However, the beach area near Devereux Slough, located 0.75 miles to the west of the project area, is a roosting and breeding site for nearly 200 birds and Devereux Beach, including Coal Oil Point Reserve, is designated as critical habitat by the USFWS. Coal Oil Point Reserve has developed a management plan with the goal of reducing disturbance to the plovers while still allowing for public beach use and has an active volunteer docent program in place during the plover's breeding season. This docent program has proven very effective over the last several years at educating beach users about how to minimize impacts on the plovers.

Recently the County reviewed the Ocean Meadows Residences project, which is located approximately 0.3 mile northeast of the project area. Draft conditions for Ocean Meadows Residences require that the project contribute to a trust deposit to help fund a portion of the COPR snowy plover management plan, including the docent program. These funds are intended to establish a long term funding source for that management plan, thereby mitigating impacts associated with increased recreational use in areas near Western Snowy Plover critical habitat. The long-term funding for the docent program will ensure that the program continues to educate beach users regarding how to minimize impacts to plover into the future. The program is anticipated to provide adequate docent coverage to meet the needs of the Ellwood/Devereax projects as well as increased use of the beach that may occur due to IVMP build-out.

Cooper's Hawk (*Accipiter cooperii*) (Species of Special Concern)

The Cooper's hawk feeds predominantly on small to medium sized birds, but will also take mammals such as wood rats, small rabbits, and reptiles. The breeding season for this species begins in mid-March to early April. Nests are built in the upper canopy of a dense strand of trees such as live oak or cottonwood. Nests are occasionally built atop a wood rat or squirrel nest. After completion of the nest, three to five eggs are laid, and incubation lasts about a month. Young Cooper's hawks fledge at about four weeks of age. The Cooper's hawk is a secretive species, but is known to breed within urban settings (LFR 2002).

Cooper's hawk are expected to be occasional visitors to the area, but are unlikely to breed due to the lack of suitable nesting habitat that normally consists of dense oak woodland.

Loggerhead Shrike (*Lanius ludovicianus*) (Species of Special Concern)

The loggerhead shrike feeds predominantly on insects, lizards, and small rodents. The breeding season for this species begins in mid-March to early April. Nests are built in solitary shrubs or small trees in proximity to open grassland. This species forages in open grassland and coastal scrub.

Although marginal breeding habitat for this species exists in the western portion of the project area, the loggerhead shrike is not expected to breed in the area due to the high frequency of public use. It may occasionally forage in the open space areas.

Western Burrowing Owl (*Athene cunicularia*) (Species of Special Concern)

The western burrowing owl feeds predominantly on ground squirrels and small rodents. The breeding season for this species begins in mid-March to early April. Nests are built in burrows and on the ground in open grassland. This species forages in open grassland and coastal scrub.

There have been no burrowing owls observed on the site and, due to the presence of people and pets in the open spaces, this species is unlikely to breed or be present on a regular basis in the project area.

Monarch Butterfly *(Danaus plexippus*) *(*Species of Local Concern*)*

The Monarch butterfly does not have federal or state listing status, but is included as a sensitive species by the CNDDB and is a species of local concern in Santa Barbara County. Winter roost sites extend from Northern Mendocino to Baja California, Mexico. The listing by CDFG is based on limited wintering roost sites within the Central California coast portion of the butterfly's West Coast wintering range. The Monarch butterfly can be found in a variety of habitats, especially those supporting milkweed plants (*Asclepias* sp.), the primary food source of the caterpillars. These butterflies frequent grasslands, prairies, meadows, and wetlands, but avoid dense forests. In the winter, Monarchs cluster together in large numbers in eucalyptus, cypress, and Monterey pine trees, often on the edge of open areas.

The closest record of Monarch roosting within the project area (Meade 1999) is located in the eucalyptus trees along Atascadero Creek, between State Highway 217 and Maria Ignacio Creek (CNDDB 2003), and the Coronado Butterfly Preserve in Ellwood.

Occasional individual butterflies are expected within the project area, but there are no records of wintering roost habitat. The eucalyptus windrows present on the eastern and western borders of the property offer only marginal potential roost sites for wintering monarch butterflies, due to the lack of suitable protection against wind.

3.5.2 REGULATORY FRAMEWORK

Goleta Community Plan

Build-out under the Goleta Community Plan (GCP) was found in the GCP EIR (Santa Barbara County 1992) to result in *significant, unavoidable* (Class I) impacts on environmentally sensitive habitats, foraging areas, nesting and breeding areas, plant life diversity, animal species, wetlands (through loss), and stream quality (resulting from degradation due to urbanization). The Board of Supervisors adopted Findings of Overriding Considerations and incorporated the following policies and development standards, which are relevant to the proposed project, to minimize potential build-out impacts on biological resources.

- **DevStd BIO-GV-2.2:** New development within 100 feet of an Environmentally Sensitive Habitat Area (ESHA) shall be required to include setbacks or undeveloped buffer zones from these habitats consistent with those detailed in specific habitat protection policies as part of the proposed development, except where setbacks or buffer zones would preclude reasonable use of the parcel.
- **DevStd BIO-GV-2.4:** Landscaping which includes exotic invasive species shall be prohibited in or near ESHA areas, Riparian Corridors and appropriate buffers. The California Native Plant Society publishes a list of invasive species to which the applicant may refer. Landscaping in ESHA areas and appropriate buffers shall include compatible native species.
- **DevStd BIO-GV-8:** The minimum buffer strip and setbacks from streams and creeks for new development and actions within the ESHA overlay that are regulated by the County Zoning Ordinances shall be as follows for ESHA areas within urban, inner rural and existing developed rural neighborhoods: a setback of 50 feet from either side of top-of-bank of creeks or existing edge of riparian vegetation, whichever is further, minimizing all ground disturbance and vegetation removal, small be indicated on all grading plans.
- **DevStd BIO-GV-8.1:** The minimum buffers, identified above, may be adjusted upward or downward on a case-by-case basis but shall not preclude reasonable use of a parcel.
- **DevStd BIO-GV-8.2:** Installation of a temporary protective fence may be required along the outer buffer boundary, at the applicant's expense, prior to initiation of any grading or development activities. Storage of equipment, supplies, vehicles, or placement of fill or refuse shall not be permitted within the fenced buffer region.
- **Policy BIO-GV-11:** Wetland areas and surrounding habitats that have been damaged by pollution and artificial stream channelization shall be restored to their natural condition to the maximum extent feasible.
- **DevStd BIO-GV-15.3:** In those cases where adverse impacts to biological resource cannot be avoided after impacts have been minimized to the greatest extent feasible, onsite restoration may be required. Restoration may also be required for parcels on which development is proposed and on which disturbance has previously occurred if the currently proposed development would exacerbate the existing impact. Where onsite

preservation is infeasible, or not desirable in terms of long-term preservation, an offsite easement and/or restoration may be considered.

- **Policy BIO-GV-16:** To the maximum extent feasible, "protected trees" shall be preserved. Protected trees are defined for the purposes of this policy as mature native trees that are healthy and structurally sound and have grown in the natural stature particular to the species.
- **DevStd BIO-GV-16.3:** A Tree Protection Plan may be required where the project site contains native oaks or other biologically valuable trees (e.g., oaks, willows, sycamores, cottonwoods, cypress, eucalyptus) that would be potentially damaged by project activities;
- **Policy BIO-GV-17:** Oak trees shall be protected to the maximum extent feasible. All land use development applications shall be processed in such a manner as to avoid damage to native oak trees. Regeneration of oak trees shall be encouraged.
- **Policy BIO-GV-18:** Trees serving as known raptor nesting or key raptor roosting sites shall be preserved to the maximum extent feasible.
- **DevStd BIO-GV-18.1:** A buffer shall be established around trees serving as raptor nesting sites or key roosting habitat except in cases where such a buffer would preclude reasonable use of a parcel.
- **DevStd BIO-GV-19.1:** For all new development, sedimentation, silt, and grease traps shall be installed in paved areas as necessary to act as filters to minimize pollution reaching downstream habitats. These filters shall address short-term construction and long-term operational impacts.
- **DevStd BIO-GV-19.2:** Washing of concrete, paint or other construction equipment shall be allowed only in areas where polluted water can be contained during construction.
- **DevStd BIO-GV-22.2:** A minimum replacement ratio of 2:1 shall be required for significant native habitat areas eliminated.

The California Coastal Act Section 30107.5 defines environmentally sensitive areas within the Coastal Zone as those that are "rare or especially valuable because of their special nature or role in the ecosystem, and which could be easily disturbed or degraded by development or other human activity."

GCP development standards BIO-GV-2.2, BIO-GV-2.4, and BIO-GV-8, identified above, implement Section 30240 of the Coastal Act, which states the ESHAs shall be protected against any significant disruption, only uses dependent on those resources shall be allowed within ESHAs, and development in areas adjacent to ESHAs shall be designed to prevent impacts thereto. In addition, the Santa Barbara Local Coastal Plan includes policies to protect sensitive habitats such as wetlands. Policy 9-9, in particular, requires a minimum buffer of 100 feet along the periphery of delineated wetlands.

3.5.3 THRESHOLDS OF SIGNIFICANCE

Methodology

The impact assessment method generally consists of the following:

(1) identifying how different project activities could affect biological resources;

(2) quantifying the effect of the project to the extent feasible (e.g., amount of habitat affected);

(3) applying the significance criteria; and

(4) determining the significance of impacts in accordance with the significance criteria.

Less than Significant Impacts

There are many areas in the County where there is little or no importance to a given habitat and it is presumed that disruption would not create a significant impact. Examples of areas where impacts to habitat are presumed to be insignificant include:[1]

a. Small acreages of non-native grassland if wildlife values are low;

b. Individuals or stands of non-native trees if not used by important animal species such as raptors or monarch butterflies;

c. Areas of historical disturbance such as intensive agriculture;

d. Small pockets of habitats already significantly fragmented or isolated, and degraded or disturbed; and

e. Areas of primarily ruderal species resulting from pre-existing man-made disturbance.

Impact Assessment Factors

The following factors are used in assessing the significance of project impacts on biological resources.

(a) Size

- The amount of the resource in question that would be impacted in terms of percentage of the whole area and square footage both on and off the project site; and

- The percent of area or species that would be impacted related to the remaining populations off the project site.

(b) Type of Impact

- The adverse indirect effects to wildlife (light, noise, barriers to movement, etc.);

[1] Pursuant to CEQA, a presumption based upon County thresholds that a project's impact is insignificant is rebutted if there is substantial evidence in light of the whole record before the lead agency that the project may have a significant impact on the environment (Pub. Res. code §21082.2

- Whether the project would remove the resource or cause an animal to abandon the area or a critical activity (e.g., nesting) in that area; and

- Whether the project would fragment the area's resources.

(c) Timing

- Whether the impact would occur at a critical time in the life cycle of an important plant or animal (e.g., breeding, nesting, or flowering periods);

- Whether the impact was temporary or permanent; and if temporary, how long would it take the resource to recover; and

- Whether the impact was periodic, of short duration, or repeated.

The timing and duration of project activities are important to consider when determining the effects on biological resources since some species are present only part of the year. Other species are only sensitive to human disturbance during certain phases of their lives, such as during breeding. Additionally, information from other resource areas, such as surface water and groundwater analyses, is used in assessing impacts to biological resources. Next, mitigation measures are identified to enable avoidance, reduction, or compensation for the impact The likely effectiveness of the mitigation measures can then be evaluated using the professional judgment of the investigators, and finally, the residual impact is identified.

Significance Criteria

Project-specific impacts on biological resources are both direct (e.g., removal of vegetation and the replacement of undeveloped open space by development), and indirect (e.g., fire management, increased public access disturbance, and long-term effects on downstream vegetation and wildlife habitats as a result of increased runoff into those areas).

California Environmental Quality Act (CEQA) Guidelines Section 15065 states that a lead agency shall find that a project may have significant effect on the environment if the project has the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

CEQA Guidelines Appendix G states that a project will normally have a significant effect on the environment if it will:

a. Conflict with adopted environmental plans and goals of the community where it is located;

b. Substantially affect protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to: marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means.

c. Substantially affect a rare or endangered species of animal, plant or the habitat of the species;

d. Interfere substantially with the movement of any resident or migratory fish or wildlife species: and

e. Substantially diminish habitat for fish, wildlife or plants.

The *Santa Barbara County Thresholds and Guidelines Manual* (2002) and the *Santa Barbara County Planning and Development Standard Conditions of Approval and Standard Mitigation Measures* (1995) established significance criteria and thresholds for determination of significant environmental effects. Disturbance of habitats or species may be significant if they substantially impact significant resources in the following ways:

a. Substantially reduce or eliminate species diversity or abundance;

b. Substantially reduce or eliminate quantity or quality of nesting areas (trees);

c. Substantially limit reproductive capacity through losses of individuals or habitat;

d. Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources;

e. Substantially limit or fragment range and movement (geographic distribution of animals and/or seed dispersal routes); or

f. Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends

Habitat-Specific Impact Assessment Guideline

The following section provides additional County guidelines specific to impact assessment for several biological communities. Guidelines are to be used in conjunction with the general impact assessment guidelines described above.

WETLAND IMPACT ASSESSMENT GUIDELINES

The following types of project-created impacts to wetlands may be considered significant:

a. Projects which result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or would threaten the continuity of wetland-dependent animal or plant species are considered to have a potentially significant effect on the environment (California Environmental Quality Act: Guidelines, Appendix G; items c, d, and t).

b. Projects which substantially interrupt wildlife access, use and dispersal in wetland areas would typically be considered to have potentially significant impacts.

c. Projects which alter the hydrology of wetlands systems affecting the wetland's function and values.

VERNAL POOLS IMPACT ASSESSMENT GUIDELINES

The following types of project-created impacts to vernal pool habitat may be considered significant:

a. Direct removal of vernal pool or vernal pools complex.

b. Direct or indirect adverse hydrologic changes such as altered freshwater input, changes in the watershed area or run-off quantity and/or quality, substantial increase in sedimentation, introduction of toxic elements or alteration of ambient water temperature.

c. Disruption of larger plant community (e.g.: grassland) within which vernal pool occurs, isolation or interruption of contiguous habitat which would disrupt animal movement patterns, seed dispersal routes or increase vulnerability of species to weed invasion or local extirpation.

IMPACT ASSESSMENT FOR INDIVIDUAL NATIVE TREES

In general, the loss of 10% or more of the trees of biological value or the loss of native specimen trees, regardless of size, on a project site is considered potentially significant.

The CEQA Guidelines Appendix G checklist and the Santa Barbara County thresholds and guidelines criteria have been the analysis of project impacts has determined that impacts relative to the following significance criteria would be less than significant, and are therefore not discussed in detail.

- Would the project substantially affect protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to: marsh, vernal pool, coastal wetland, etc.) through direct removal, filling, hydrological interruption, or other means?

- *Although the wetlands within the Anisq'Oyo' Park pond are protected by definition under Section 404 of the Clean Water Act, proposed Downtown Catalyst projects would not substantially affect the limited wildlife habitat or water quality of the wetland area. Downtown Catalyst project improvements at Anisq'Oyo' Park would actually increase the overall value of the wetland habitat by: planting additional native wetland species; reducing fertilizer input to the pond; improving screening or filtration of water entering the pond to reduce pollutants; changing the pond bottom composition to improve filtration; reconfiguring the pond to require less water additions in the summer and fall; and reconfiguring to accommodate areas for additional transitional upland/wetland habitat. Therefore, the proposed project would not reasonably be expected to adversely impact any protected wetland.*

- Would the project substantially affect the population of a state or federally listed, proposed, or candidate species, or would it reasonably expect to affect the breeding or foraging habitat of such a species resulting in substantially increased mortality or reduced reproductive success?

- *There are no state- or federally-listed plants or animal species expected to occur in, or use the habitats within, the project area. Therefore, the proposed project is not reasonably expected to impact any other listed plant or wildlife species.*

- Would the project interfere substantially with the movement of any resident or migratory fish or wildlife species?

- *Disturbances to wildlife traveling through the project area resulting from implementation of the Master Plan would be similar to existing conditions. As a result, the proposed project would not substantially affect the ability of any resident wildlife to use travel corridors within the project area to migrate between natural habitats in the vicinity.*

3.5.4 PROJECT IMPACTS AND MITIGATION MEASURES

Impact BIO-1: Increased residential development encroachment and increased human and pet use associated with build-out in the southwestern project area has the potential to result in direct or indirect adverse hydrologic changes to vernal pool habitat including the potential for altered freshwater input or increase in sedimentation.

The Proposed Isla Vista Redevelopment Project EIR (Santa Barbara County 1990) and the IV Master Plan Project Overview and Scoping summary (Santa Barbara County 2004) identify eight parcels located along the south side of Del Playa Drive as supporting known ESH vernal pool habitat. Of those eight parcels, six of them are publicly owned. A Coastal Development Permit was issued for the remaining two parcels in 2004. An increase in the Isla Vista population resulting from project area build-out would result in increased foot traffic and pet use of open space that could include vernal pool habitat. Development in the vicinity of the eight parcels along the south side of Del Playa Drive that contain known ESH vernal pool habitat would result in a *potentially significant indirect impact on biological resources.*

Based on a recent aerial photo there are no remaining undeveloped parcels in this sensitive area, no direct or indirect impacts on unrecorded ESH vernal pool habitat in the western area of the project area would occur.

The following mitigation measure is identified to reduce impacts to recorded ESH vernal pool habitat along the south side of Del Playa Drive, and would ensure consistency with GCP Development Standard BIO-GV-15.3 recommending on- or off-site restoration where adverse impacts on biological resource cannot be avoided.

Mitigation Measure BIO-1: The following measures shall be undertaken on the County and IVRPD owned parcels (APN 75-181-21, 24, 25, 26, and 27) to reduce and/or avoid impacts to the smaller vernal pools located along Del Playa Drive. These improvements shall include:

a. Provide convenient garbage collection and bags for disposal of pet droppings;

b. Maintain established access trails through the open space areas and enhance barriers on sides of trails to discourage encroachment;

c. Protect vernal pool habitat during the critical winter season (November 15 to April 15) by introducing educational signage relating to habitat sensitivity during this time; and

d. Provide signage prohibiting bicycle use off established trails and unleashed pet use in vernal pool habitat areas.

Residual Impact: Improving the established access trails through parcels on the south side of Del Playa Drive, increasing awareness to vernal pool habitat sensitivity during the critical winter season, and establishing signage prohibiting biking off established trails and unleashed pet use of the area would effectively limit disturbance of native species and sensitive habitats and would reduce direct or indirect adverse hydrologic changes to vernal pool habitat including the potential for increased sedimentation. Implementing the proposed mitigation measures would reduce impacts on biological resources to *adverse, but less than significant levels* (Class II).

Impact BIO-2: Increased residential populations associated with Isla Vista Master Plan build-out would intensify human and pet visitation at the two protected ESH vernal pool habitats in the northwestern project area and could result in direct or indirect adverse changes to vernal pool habitat including the potential for increased sedimentation or disruptions to the larger plant community (e.g., grassland) within which vernal pools occur.

The Proposed Isla Vista Redevelopment Project EIR (Santa Barbara County 1990) and the IV Master Plan Project Overview and Scoping summary (Santa Barbara County 2004) identify ESH vernal pool habitat within the Camino Corto Open Space and the Del Sol Vernal Pool Reserve and Open Space, in the northwestern corner of the project area. More recently, the Ellwood-Devereux Open Space Habitat and Management Plan (OSHMP) (City of Goleta, UCSB, and Santa Barbara County 2004) have considered the Camino Corto Open Space and the Del Sol Vernal Pool Reserve and Open Space in the larger Devereux Creek watershed recreational plan. Existing foot trails within the Del Sol Vernal Pool Reserve and Camino Corto Open Space, and pedestrian/bike trails within the Camino Corto Open Space connecting to the UCSB West Campus would be maintained. Within the County portion of the Open Space plan area, the Isla Vista Parks and Recreation District would continue to manage the Camino Corto and Del Sol Preserves.

The OSHMP has identified various policies directed at these recreational and biological amenities. Those relevant to resources within the project area include the following:

Public Access Goal 1: Provide public access and passive recreation opportunities at the Open Space project area compatible with natural resource protection and the preservation of

undeveloped open space, and with the management programs of existing reserves and preserves.

Public Access Policy 1.2. Integrate the trail system with existing managed areas and with proposed residential development.

Public Access Policy 1.3. Ensure that public access and public uses in the Open Space plan area do not adversely affect resources, programs, and management in the COPR.

Public Access Goal 2. Maintain the natural, undeveloped, and scenic character of the Open Space plan area while protecting coastal resources.

Public Access Policy 2.3. Prohibit commercial bicycling operations or other commercial recreation operations in the Open Space plan area.

Public Access Policy 2.4. Enforce existing dog leash policies, regulations, and ordinances of each sponsoring agency in their jurisdiction.

Public Access Goal 3. Maintain the overall historic public access and uses, while providing a variety of passive recreation uses throughout the Open Space plan area.

Public Access Policy 3.1. Maintain historic public access points to the Open Space plan area.

Public Access Policy 3.2. Establish and maintain a trail system that recognizes historic trails and uses while managing access to protect natural resources.

An increase in residential population within the project area resulting from Master Plan build-out would increase the intensity of passive recreational use (including pets) within these open spaces and vernal pool complexes. The existing extensive visitation within the open space areas by walkers, bikers, and pet owners would be increased. This increase in use has the potential to result in damage to the ESH vegetation, as well as decrease the ESH value to wildlife. These changes would be *potentially significant indirect impacts on biological resources*.

The following measure would provide increased specificity to the Public Access Goals and Policies identified in the recent Ellwood-Devereux OSHMP, and build upon existing constructive management strategies maintained by IVRPD.

Mitigation Measure BIO-2: Existing access trails to the Camino Corto Open Space and the Del Sol Vernal Pool Reserve shall be improved to reduce the potential risk of increased disturbance to native species and sensitive habitats resulting from increased passive recreational use, consistent with the Open Space and Habitat Management Plan (March 2004) policies for these habitat areas. These improvements within the existing vernal pool open space areas shall include:

a. Provide convenient garbage collection and bags for disposal of pet droppings;

b. Maintain established access trails through the open space areas and enhance barriers on sides of trails to discourage encroachment;

c. Protect vernal pool habitat during the critical winter season (November 15 to April 15) by introducing educational signage relating to habitat sensitivity during this time; and

d. Provide signage prohibiting bicycle use off established trails and unleashed pet use in vernal pool habitat areas.

Residual Impact: Improving the established access trails through the Camino Corto Open Space and the Del Sol Vernal Pool Reserve, increasing awareness to vernal pool habitat sensitivity during the critical winter season, and establishing signage prohibiting biking off established trails and unleashed pet use of the area would effectively limit disturbance of native species and sensitive habitats and would reduce direct or indirect adverse changes to vernal pool habitat including the larger plant community (e.g.: grassland) within which vernal pools occur. Implementing the proposed mitigation measures would reduce impacts on biological resources to *adverse, but less than significant levels* (Class II).

Impact BIO-3: Development resulting from Master Plan implementation would have the potential to substantially reduce or eliminate the quantity or quality of nesting areas and to degrade wildlife habitat used for foraging raptor species.

Development activities within the project area that would potentially affect native vegetation and trees, or that would potentially disturb ground surfaces in the vicinity of the eucalyptus tree windrows could impact individual animals and wildlife habitat. Affected species would include primarily birds, the most important of which are nesting raptors that have been recorded to nest in the area and foraging raptors such as white-tailed kites. These raptors species have a nesting season identified between March 1 to August 15. In a report prepared for the Isla Vista Parks and Recreation District, Watershed Environmental (2004) recommended that construction activities within the vicinity of potential raptor nesting habitat be scheduled outside of the nesting season. If avoiding the nesting season would not be feasible, establishing a buffer of ~~300~~ 500 feet between construction activities and observed raptor nests is recommended.

Five vacant parcels are located within 300 feet of the eastern project area boundary and eucalyptus windrow, native vegetation, and trees (from south to north: APN 075-222-012; 075-222-016; 075-171-014; 075-121-004; and 075-041-012). Within these parcels, marginal habitat is present for several sensitive bird species including white-tailed kite, Cooper's hawk, loggerhead shrike, and nesting raptors. Proposed Master Plan land use designations would allow for increased residential densities in this area. It is reasonable to expect that the new designations would be an incentive to redevelop existing, aging structures and achieve a higher economic return on the property's potential. In addition, a pair of nesting red-shouldered hawks has been observed within a eucalyptus tree in the western portion of Estero Park (Watershed Environmental 2004). Proposed Estero Park improvements would occur within the vicinity of this tree. Disturbances to nesting raptors resulting from construction

equipment noise and disturbance to nesting or roosting trees would be a *potentially significant impact on biological resources.*

No vacant parcels exist within the vicinity of the western project area boundary and eucalyptus windrow. The proposed land use designation of RES-3.3 (Residential 3.3 dwelling units per acre) within 300 feet of the western project area boundary would be comparable to the existing RES-4.6/3.3 designation, and is not anticipated to result in the intensification of future residential development. Therefore, no new impacts on raptor nesting or roosting within the nesting season would occur.

The Goleta Community Plan Development Standards BIO-GV-18 and BIO-GV-18.1 require that trees providing raptor nesting or roosting habitat be preserved to the maximum extent feasible and that buffers be established around trees to protect raptor use. The following measure would ensure consistency with GCP development standards BIO-GV-18 and 18.1 and would minimize potential construction impacts on sensitive bird species habitats.

Mitigation Measure BIO-3: For construction activity on vacant parcels within ~~300~~ 500 feet of the eucalyptus windrows at the eastern edge of Isla Vista ~~Camino Majorca~~ and/or Estero Park, requiring a coastal development permit and occurring between ~~March~~ February 1 and August 15, project area, project applicants shall fund biological surveys to identify any presence of raptor nesting and/or roosting sites in eucalyptus windrows or other native vegetation or trees. The surveys shall be conducted 2 weeks prior to the start of ground clearing or grading activity. If survey results indicate the presence of raptor species nesting or foraging within or adjacent to any of these parcels, a ~~300~~500-foot "no construction disturbance zone" measured from each raptor nest or roosting site shall be maintained during construction activities. Conducting these surveys will decrease the likelihood that raptor reproductive cycles are impacted by construction activities proposed in this project.

Residual Impact: Mitigation Measure BIO-~~1.4~~3 would reduce impacts on sensitive and common bird species habitats, including nesting raptors, to *adverse, but less than significant levels* (Class II).

Impact BIO-4: Proposed roadway improvements, widening of sidewalks, landscaping, parkland improvements, and other infrastructure improvements could result in substantial impacts on non sensitive wildlife species diversity or abundance.

Elements of the Master Plan including roadway improvements, widening of sidewalks, landscaping, parkland improvements, and other infrastructure improvements could result in the loss of habitat used by a variety of wildlife in the project area. However, most of the wildlife in the project area is accustomed to urban development and extensive human presence. Most of the planned improvements discussed in the Master Plan are centered in the most populated areas that offer the least value to most wildlife species, and are therefore expected to result in only minimal impacts to wildlife and wildlife habitat. Also, most of the undeveloped habitat within undeveloped parcels in the project area is highly degraded and supports primarily non-native annual grasses and herbaceous species, which are known to be common locally and regionally. Therefore, the loss of non-native annual grasses and

herbaceous species would not contribute to the decline of any unique wildlife species and would be *an adverse, but less than significant impact* (Class III) on biological resources.

Impact BIO-5: Master Plan build-out has the potential to substantially affect individuals of sensitive plant species, including southern tarplant.

Incremental, small project development on 30 currently undeveloped parcels could occur as part of project area build-out. The most recent CNDDB (2003) lists several recent records of sensitive plant species in the project vicinity. Southern tarplant, a species considered to be rare or endangered by the California Native Plant Society, has been recorded within the project area. The exact plant locations are not known because the extent of the local population can change from year to year. Results from biological investigations of the ten Master Plan affordable housing sites have not identified this species. However, proposed development would potentially result in degradation of habitat for sensitive plant species, and loss of individuals or habitat by direct disturbance i.e., grading. These would be *potentially significant impacts on biological resources.*

The following measure would minimize impacts to sensitive plant species in the project area, such as southern tarplant, and would ensure consistency with GCP development standard BIO-GV-15.3 requiring onsite preservation or off-site compensation for important biological resources.

Mitigation Measure BIO-5: Because the presence of southern tarplant is unknown and can change from year to year, the following measure shall be implemented to determine the level of impacts that could occur for specific development projects within the 30 currently undeveloped parcels in the project area.

a. For sites that are undeveloped, upon application submittal and prior to an application being deemed complete, County staff will conduct a site visit to determine if the site includes potential tarplant habitat. If such conditions are identified, the applicant shall cause a sensitive plant species survey to be prepared by a P&D qualified biologist.

b. If southern tarplant specimen(s) are found during a particular survey, the project applicant shall develop and implement a species mitigation plan that shall include protection measures such as avoidance, seed collection, topsoil salvage, off-site restoration or enhancement, or off-site compensation acceptable to the appropriate permitting agencies for the level of impact that would occur. This measure would minimize impacts on the southern tarplant and provide a means of regenerating lost specimens due to disturbance from construction.

Residual Impact: Impacts to sensitive plant species in the project area would be reduced to *less than significant levels* (Class II) with the implementation of measures to avoid, mitigate, or compensate for impacts to southern tarplants on any parcels where they are found.

Impact BIO-6: IVMP build-out and improvements have the potential to remove native and non-native trees and vegetation that could conflict with local policies protecting such species.

Overall Master Plan build-out would remove an unknown, yet potentially substantial number of native and non-native trees and vegetation. IVMP components, including roadway improvements, widening of sidewalks, landscaping, additional housing build-out, and other infrastructure improvements, could result in the loss of trees and vegetation. Introduction of new street trees along major thoroughfares, however, would likely offset the loss of some of these existing trees and vegetation, particularly in the Downtown project area.

Relevant local policies that protect native species and vegetation include the following. The Santa Barbara County Coastal Plan Policy 9-35 requires that all land use activities be carried out to avoid damage to oak trees. The Santa Barbara County Coastal Zoning Ordinance, Article II, Sec. 35-140 regulates removal of any tree meeting certain criteria for size, location, and habitat value. In addition, trees are not to be removed unless they are dead, diseased, otherwise weakened, or are preventing construction of an already approved project. Goleta Community Plan Policy BIO-GV-16 and BIO-GV-17 require preservation and protection of mature, healthy native trees to the maximum extent feasible, and Development Standard BIO-GV-16.3 states that a Tree Protection Plan (TPP) may be required where the project site contains native oaks or other biologically valuable trees that would be potentially damaged by project activities. A TPP would be prepared by a certified arborist who would summarize the type of project, identify the potential impacts, and document the type and number of trees affected. The TPP would then make conclusions and recommendations accordingly.

Adhering to local policies and development standards, the impact to biological resources from the potential removal of native and non-native trees from IVMP implementation is considered *adverse, yet less than significant (Class III)*.

The removal of native and non-native trees from sidewalk widening and installation is a *potentially significant* impact to biological resources. The following measure will reduce the impacts to trees resulting from the installation of new sidewalks.

Mitigation Measure BIO-6.1: Where feasible, during installation of new sidewalk or sidewalk widening projects, the Public Works department shall install street trees along the street frontage at spacing no greater than 50 feet on center.

Residual Impacts: Impacts resulting from removal of street trees throughout the project area for new sidewalk construction would be *mitigated to less than significant levels (Class II)* with the implementation of measures requiring new street tree plantings. Impacts from other IVMP components remain less than significant.

Cumulative Impacts

Build-out of the IVMP, together with the pending and approved projects identified in chapter 3, will result in cumulative impacts to biological resources. Together, these cumulative projects will ultimately generate 3,352,973 sf of commercial and industrial development and

3,313 new residential units throughout the Goleta Valley, UCSB and Isla Vista area. This will result in a cumulatively significant amount of development that has the potential to affect biological habitats.

Proposed project area impacts on biological resources, including direct and indirect impacts on ESHA, native and non-native trees and vegetation, and sensitive wildlife species would be mitigated to *adverse, but less than significant* (Class II) with proposed measures BIO-1 through BIO-6.2. As there are only 30 remaining undeveloped parcels throughout the highly developed and urban project area, impacts to biological habitat would be limited.

Increased population, as a result of IVMP build-out, has the potential to impact the Western Snowy Plover (*Charadrius alexandrinus nivosus*). Suitable habitat for the Western Snowy Plover is not known in the project area and the plover is not expected to breed or roost there. However, the beach area near Devereux Slough, which is located 0.75 miles west of the project area, is a roosting and breeding site for nearly 200 birds. This stretch of Devereux Beach, including the Coal Oil Point Reserve, is designated as critical habitat by the USFWS. Devereux Beach is also a popular recreational area for Isla Vista residents. It is anticipated that an increase in beach usage and visitation will result from IVMP build-out.

The Coal Oil Point Reserve currently facilitates and manages an active volunteer docent program during the plover's breeding season. The purpose of this program is to reduce disturbances to the plovers while still allowing for public beach use. This docent program has proven very effective over the last several years in terms of educating beach users on how to minimize impacts on the plovers. In addition, it is anticipated that the docent program will be expanded with implementation of the Joint Proposal for the Ellwood-Devereux Coast, and that a full time docent coordinator will be hired. Continuation of this program during the plover breeding season will reduce cumulative project impacts.

Mitigation Measure BIO-C-1: The Redevelopment Agency shall cause interpretive panels to be constructed and installed at the following beach access points in Isla Vista.

1. Camino Majorca
2. Escondido Pass
3. Camino Del Sur
4. Camino Pescadero
5. El Embarcadero

Those interpretive panels shall include information about how to avoid snowy plover habitat as well as other information pertinent to snowy plover biology and habitat. The placement of these panels will ensure all existing, and any future, users that walk to Devereux Beach on the beach, or through UCSB property, will encounter information regarding the snowy plover prior to reaching Devereux Beach.

The IVMP will contribute a significant amount of this cumulative growth to the area (1,447 housing units and 51,485 sf of commercial development). As a result, the project's

cumulative biologic impacts would be *significant, but feasibly mitigated to less than significant* (Class II).