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STATE CLEARINGHOUSE

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Notice of a Draft Environmental Assessment for the Cabin and Campsite Improvements at Wall Beach, Santa Barbara County

Dear Colonel, Mastalir:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Draft Environmental Assessment (EA) for the Cabin and Campsite Improvements at Wall Beach (Project). The Lead Agency is the U.S. Air Force.

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]. 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). CDFW is charged 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.

Project Description and Summary

Objective: The purpose of the Proposed Action is to generate revenue by improving a previously disturbed recreation area by installing four separate prefabricated kit cabins, and five tent camping sites. Each cabin would be approximately 23 feet long by 14 feet wide by 10.5 feet high and supported by 16 concrete pier foundations, 8 to 16 inches above grade. There would be no utilities or plumbing associated with the cabins.

Campsites would not have any facilities or amenities other than picnic tables and would not include fire pits. All open fires would be prohibited. Wall beach is currently not available to overnight use, this Project would introduce extended use, including overnight use, of the site.

Location: Vandenberg Air Force Base (VAFB) is located on California's south-central coast, approximately halfway between San Diego and San Francisco, in western Santa Barbara County. The Proposed Project area is located on north VAFB at Wall Beach, which is centrally located within VAFB, less than 5 miles from California Boulevard. Wall Beach is accessible by existing paved roads such as New Beach Road and 35th Street. An existing, paved, 0.5 acre parking area at the western terminus of New Beach Road provides access to the adjacent beach and proposed Project area. The proposed cabins and campsites would be installed immediately east of the parking area. The proposed Project would disturb approximately 0.60 acres.

Comments and Recommendations

CDFW appreciates the coordination over the last few years and the level of interest in gaining CDFW concurrence with the Vandenberg Integrated Natural Resource Management Plan (INRMP).

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

Comment #1: State threatened and endangered animals

Issue: CDFW is concerned that the Project may impact California Endangered Species Act (CESA)-listed Belding's savannah sparrow (*Passerculus sandwichensis alaudinus*), California least tern (*Sternula antillarum browni*) peregrine falcon (*Falco peregrinus anatum*), and Species of Special Concern western snowy plover (*Charadrius nivosus*) through accommodating higher levels of human occupancy and disturbance in and adjacent to areas occupied by the above species.

Specific Impact: Grading, vegetation removal, and other ground disturbances could crush and bury listed or sensitive plants and animals, resulting in direct mortality. The Project may also affect adjacent habitat by loud noises, lighting, increased human presence and activity, fugitive dust, and spreading invasive weeds, resulting in stress, displacement, and mortality of these species

The EA states that biological resources would continue to be managed in accordance with the INRMP and recent BOs issued for Wall Beach Cabin and Campsite

Construction at Vandenberg Air Force Base (USFWS 2019), but a specific mechanism for ensuring the Air Force is closely monitoring the cabin and tent occupants is not described in the EA. Without an enforceable mechanism for compliance, the Project has the potential to directly or indirectly impact Belding's Savannah Sparrow, California least tern, Peregrine Falcon, western snowy plover.

Why impact would occur: The Project would result in direct and indirect impacts through grading, habitat conversion, noise, lighting, dust, and habitat fragmentation. Additionally, unsupervised overnight cabin and tent occupants could potentially cause significant damage to listed species and their habitat without clear education, oversight, and monitoring by Air Force personnel.

Site construction and operations may result in a substantial amount of noise through road use, equipment, and other project-related activities. Increase visual disturbance, from the current low-use baseline, is also a potential impact to listed species

Increased ambient lighting levels can increase predation risks and disorientation and disrupt normal behaviors of birds in adjacent feeding, breeding, and roosting habitat (Longcore and Rich 2004).

Evidence impact would be significant: Project implementation would result in a substantial adverse effect, either directly via removal of habitat or through habitat modifications caused by alteration of existing public use, on a species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the Wildlife Agencies (CDFW or U.S. Fish and Wildlife Service). It is unclear how Project impacts would be reduced to less than significant without appropriate avoidance, minimization, or mitigation measures.

Anthropogenic noise can disrupt the communication of many wildlife species including birds (Sun and Narins 2005, Patricelli and Blickley 2006, Gillam and McCracken 2007, Slabbekoorn and Ripmeester 2008). Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise (Rabin et al. 2006, Quinn et al. 2017). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009) and cause increased stress that results in decreased immune responses (Kight and Swaddle 2011). Without assessing noise disruptions or providing appropriate minimization or mitigation measures, the Project may result in substantial impacts to sensitive wildlife species.

Recommended potentially feasible mitigation measure(s):

Mitigation Measure #1: CDFW recommends Project construction be limited to outside of the western snowy plover breeding season (1 March – 30 September) to minimize effects on breeding plovers.

Mitigation Measure #2: CDFW recommends the Project restrict use of equipment and lighting to hours least likely to disrupt wildlife (e.g., not at night or in early morning before 9am). Generators should not be used except for temporary use in emergencies. CDFW recommends use of noise suppression devices such as mufflers or enclosure for generators. Sounds generated from any means should be below the 55-60 dB range within 50 feet from the source.

Mitigation Measure #3: CDFW recommends pile driving not be used during construction of the Project. Alternative methods to construct Project features, that produce less noise and vibration, should be utilized if technically possible.

Mitigation Measure 4: Parking, driving, lay-down, stockpiling, and vehicle and equipment storage should be limited to previously compacted and developed areas. No off-road vehicle use should be permitted beyond the Project site and designated access routes. Disturbances to the adjacent native vegetation should be minimized. CDFW recommends a minimum 250-meter buffer between Project operations and listed species habitat.

Mitigation Measure #5: Non-native plants, including noxious weeds (as listed by the California Invasive Plant Council), should be prevented from establishing in temporarily disturbed areas, either by hand-weeding or selective application of herbicide. A weed monitoring program with regular inspection, mapping, and removal should be implemented.

COMMENT #2: Vegetation Communities

Issue: The EA utilized a system other than the State of California's current mapping standard nomenclature. The state's standard is consistent with the National Vegetation Classification System which utilizes alliance and association-based classification of unique vegetation stands. Without an accurate list of vegetation communities, CDFW is unable to analyze affect and provide appropriate avoidance, minimization and mitigation measures for any sensitive vegetation communities impacted.

Specific impact: CDFW is not able to analyze impacts to vegetation communities that may occur on and adjacent to the Project, or provide avoidance, minimization, and mitigation recommendations, without a narrative about the alliance-based vegetation communities or a map depicting the location of these communities.

Why impact would occur: In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish and Game Code §1940). This standard complies with the National Vegetation Classification System which utilizes alliance and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the MCV, found online at <http://vegetation.cnps.org/>. Through this new vegetation classification system, CDFW tracks Sensitive Natural Communities and their respective rankings using the MCV

Alliance and Association names for vegetation communities. The EA uses Holland ecosystem classification to identify vegetation communities. Without MCV names identified for the vegetation communities potentially affected by the Project, CDFW is unable to determine if the project may impact sensitive vegetation communities or wildlife/rare plant species that depend on these communities or recommend appropriate avoidance and/or minimization measures.

Evidence impact would be significant: An S3 ranking indicates there are 21-80 occurrences of this community in existence in California, S2 has 6-20 occurrences, and S1 has less than 6 occurrences. CDFW considers natural communities with ranks of S1-S3 to be sensitive natural communities that meet the CEQA definition (CEQA Guidelines, §§ 15380, 15063, and 15065) to be addressed in CEQA (CEQA Guidelines, § 15125[c]). Without appropriate vegetation classification, the Project may result in substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any Sensitive Natural Communities and S1-S3 ranked species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: In order for the EA to determine the rarity ranking of vegetation communities potentially affected by the Project, the MCV alliance/association community names should be provided as CDFW tracks rare natural communities using this classification system. The EA should include a map clearly depicting MCV vegetation communities located within the Project survey area.

Mitigation Measure #2: CDFW recommends conducting floristic, alliance- and/or association-based mapping and vegetation impact assessments at the project site and within the neighboring vicinity following the updated CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>). The Manual of California Vegetation should be used to inform this mapping and assessment to fully allow CDFW to comment on Project impact significance to vegetative communities (Sawyer et al. 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

Mitigation Measure #3: CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. This includes keeping areas with sensitive natural communities closed to recreation activities. If avoidance is not feasible, the Department recommends mitigating at a ratio of no less than 5:1 for impacts to S3 ranked communities and 7:1 for S2 communities. This ratio is for the acreage and the individual plants that comprise each unique community.

Comment #3: Botanical Surveys

Issue: The EA does not include surveys for State or federally rare, threatened, or endangered plants, nor include any discussion of rare, threatened, or endangered plants.

Specific impact: CDFW is concerned that the Project is impacting an area known to have beach spectaclepod (*Dithyrea maritima*), a CESA-listed species that is critically imperiled, and surf thistle (*Cirsium rothophilum*), a CESA-listed species, as well as numerous other rare plant species.

Project induced native plant population declines or local extirpation of special status plant species may result from immediate death or injury from trampling, habitat fragmentation, alteration of soil chemical and physical makeup, increased competition with exotic invasive weeds, and reduce photosynthesis and reproductive capacity. The effects of these impacts would be permanent or occur over several years.

Why impact would occur: Impacts to botanical resources could occur from Project construction, maintenance, mitigation, irrigation, and recreational activities that result in vegetation crushing, trimming or removal, human intrusion, and the erosion, crushing and compaction or excavation of soil. The Project may introduce exotic invasive species such as Argentine ant (*Linepithema humile*) onto habitats supporting botanical resources and their arthropod pollinators and dispersal agents. It has been documented that wildlife habitat located within 200 meters of areas infested with Argentine ants were more likely to have been invaded. Within invaded sites, native ants were largely displaced, and their median species richness declined by more than 60% compared with uninvaded sites. (Fisher, Mitrovich, Matsuda and Pease, 2010).

Evidence impact would be significant: Botanical surveys for the Project appear to have not been conducted and may overlook the presence or actual density of some special status plant species on or near the Project. Take of special status plant species including State- and federal- listed species may occur without adequate detection, avoidance and mitigation measures. Therefore, the Project may continue to result in a substantial adverse 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.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #1: To reduce impacts to less than significant, and follow sensitive species avoidance guidance in the INRMP, CDFW recommends that protocol-botanical surveys be conducted using methods to maximize detection of special status plants on the Project site and that these results be disclosed in the EA. All botanical surveys should be floristic in nature and follow CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (Survey Protocols) see: (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>).

Mitigation Measure #2: CDFW recommends avoidance of any special status plant species. CDFW does not consider translocation of rare/sensitive plant resources into a Projects' landscaping appropriate mitigation to offset biological values.

Mitigation Measure #3: CDFW recommends consulting CDFW's California Natural Diversity Data Base (CNDDDB) to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp;

Conclusion

We appreciate the opportunity to comment on the Project to assist the Air Force in adequately analyzing and minimizing/mitigating impacts to biological resources, consistent with the INRMP. If you have any questions or comments regarding this letter, please contact Kelly Schmoker-Stanphill, Senior Environmental Scientist (Specialist), at (626) 335-9092 or by email at Kelly.schmoker@wildlife.ca.gov.

Sincerely,



Erinn Wilson
Environmental Program Manager I

cc: CDFW

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