19LLA-00000-00003
FRAMPTION - LOT LINE ADJUSTMENT
TORO CANYON RD 3/12/19
SANTA BARBARA 155-230-007

BIOLOGICAL EVALUATION OF APNs 153-230-017 AND 153-230-018, TORO CANYON ROAD, SANTA BARBARA COUNTY, CALIFORNIA

View from southern edge of proposed building envelope on Lot 2, looking north. 10 December 2018.

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Biological Evaluation of APNs 153-230-017 and 153-230-018, Toro Canyon Road, Santa Barbara County, California

1.0 Project Description. The project is a Lot Line Adjustment between two (2) existing lots in the 10-E-1 zone district located at 785 (Lot 1) and 805 (Lot 2) Toro Canyon Road and includes reconfiguring the existing Building and Development Envelopes, redefining access corridors and modifying the 100-foot Fire Fuel Management Zones on each lot as previously established by the approval and recordation of Parcel Map 14,534 (Table 1).

Table 1. Size of Lots and Building/Development Envelopes.

Lot	Gross Area	Building Envelope	Development Envelope	FFMZ
1 (785 Toro Cyn Rd)	2.0 acres	0.45 acres	0.72 acres	0.39 acres
2 (805 Toro Cyn Rd)	10.2 acres	0.60 acres	1.00 acres	0.73 acres

2.0 Methods. The subject parcels were visited on 28 November 2018 to familiarize the biologist (Hunt) with the site and the proposed building and development envelopes. Another detailed site visit was conducted on 10 December 2018 between 1130 hrs and 1615 hrs to evaluate habitats on and around the parcels for special-status and unregulated wildlife, characterize existing conditions and land use, and to map vegetation in order to determine potential impacts on biological resources that may result from the proposed project and establish measures to mitigate such impacts, if necessary. The seasonal timing of the survey was not optimal for detecting annual plants, but was adequate for mapping vegetation and surveying for perennial species. The survey focused on those portions of the lots covered by the proposed Building Envelopes, Development Envelopes, the 100-foot fire fuel management zones (FFMZ) for both lots, and a 50-100-foot wide swath around the FFMZs. Due to winter dormancy, native grass occurrence was mapped and visually estimated as "greater than or less than 10% cover", the cover threshold used in County of Santa Barbara (2008) as classifying vegetation as "native grassland". The California Natural Diversity Data Base (CNDDB) records for the USGS 7.5-minute quadrangles on and surrounding the project site were consulted for special-status plant and wildlife records (CDFW, 2018). The coordinates of special-status plant and wildlife observations were mapped in the field to an accuracy of eight feet using a Garmin hand-held GPS unit (Model GPSmap 60CSx). Site photographs of the project area are included in Appendix 1.

3.0 Existing Conditions.

3.1 Location and Land Use. The subject parcels are located at 785 and 805 Toro Canyon Road, approximately 0.5 air miles northeast of its intersection with East Valley Road in the foothills of the south slope of the Santa Ynez Mountains, and in the upper watershed of Toro Canyon Creek at an elevation of approximately 845 feet above sea level (Fig. 1). The parcels are within a low-density residential, semi-rural neighborhood zoned "Inner-Rural" (10-E-1), with a minimum parcel size of 10 acres, and are subject to the Toro Canyon Community Plan Area policies and development standards (County of Santa Barbara, 2004). A residence with outbuildings and access roads formerly occupied portions of both proposed building/development envelopes.

These structures were removed in May 2004, per SB County Demolition Permit 04CNP -00412, as shown by aerial photographs.

3.2 Soils and Geology. A soils and geologic report, including a site-specific slope stability analysis, has been prepared for these properties (Coastal Geoscience, Inc., n.d.). Lodo-Sespe complex soils cover the steeper portions of both lots. These soils form in material weathered from sandstone or shale bedrock in foothill regions of the Santa Ynez Mountains. The lowest elevation portions of both lots, adjacent to Toro Canyon Road, are mapped as Todos clay loam, which has a similar origin and characteristics of Lodo-Sespe soils (Shipman, 1981). Toro Canyon Creek and its associated riparian vegetation runs along the east side of Toro Canyon Road, opposite the lots. Alluvial soils associated with this drainage do not occur on the subject lots.

3.3 Toro Canyon Creek. The Toro Canyon Creek watershed is one of the major drainages of this portion of the south slope of the Santa Ynez Mountains. The watershed is steeply inclined, going from a maximum elevation of 3,170 feet above sea level to sea level in about 3.8 air miles, a 16% average slope. Surface flows throughout the main stem are intermittent as a result of groundwater extraction for agricultural and municipal purposes. The reach opposite the subject lots is seasonal, experiencing 'flashy' surface flows only during the rainy season. The subject lots slope to the southeast and although located 220 to 310 feet west of this drainage, they drain to Toro Canyon Creek via existing drainage swales and culverts installed along Toro Canyon Road.

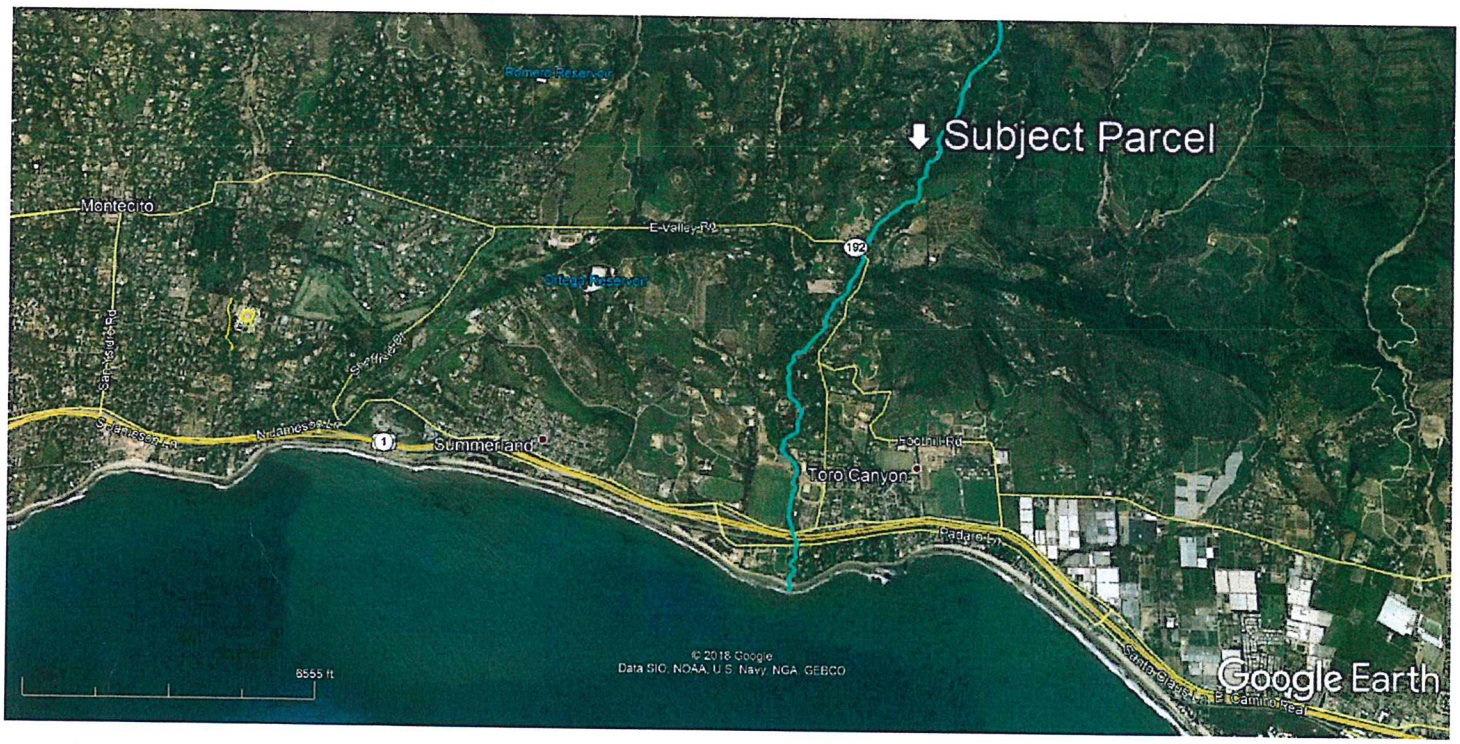

Figure 1. Project location off upper Toro Canyon Road in Montecito. Main stem of Toro Canyon Creek is shown by the blue line; creek contacts Pacific Ocean just west of Loon Point. Carpinteria is at lower right. Imagery dated 12 April 2018.

4.0 Biological Resources. The proposed Building and Development Envelopes on both lots have limited value as habitat for plants and animals because they are vegetated with weedy, non-native annual grassland that appears to be maintained by mowing. The FFMZs of both lots extend well into areas characterized as eucalyptus woodland with ruderal non-native grasses understory interspersed with coastal sage scrub vegetation that, although disturbed by previous road grading and tree removal, retains a high level of high biological diversity that provides habitat for a number of special-status plants and animals (Table 2). Coastal sage scrub has local and State protection (County of Santa Barbara, 2004; 2008; Sawyer et al., 2008).

4.1 Vegetation. Two discrete plant communities/wildlife habitats are present on the subject lots: **non-native annual grassland** and **coastal sage scrub** (nomenclature of Holland, 1986). These plant communities are mapped in Figure 2 as vegetative alliances based on dominant and sub-dominant species richness and cover (Sawyer et al., 2009). Appendix 2 lists plants observed on 10 December 2018 during the site survey of both lots.

Non-native annual grassland covers most of the proposed Building and Development Envelopes on both of the proposed lots (Fig. 2). These areas are currently maintained by periodic mowing. Based on dominant and sub-dominant species, this vegetation is classified as ***Bromus diandrus* Semi-Natural Herbaceous Stand**, per the alliance-based scheme developed by Sawyer et al. (2008). The dominant species observed here includes ripgut brome (*Bromus diandrus*) and red brome (*Bromus rubens*), with a diverse, non-native forb component dominated by redstem filaree (*Erodium cicutarium*). Black mustard (*Brassica nigra*) is a dominant forb in grassland within the FFMZ west of the development envelope on Lot 1. Plants found in this plant community on 10 December 2018 are listed in Appendix 2. Approximately 87,710 (2.01 acres) of non-native annual grassland occurs within the Building and Development Envelopes and FFMZs of Lots 1 and 2.

Coastal sage scrub occurs in the FFMZs on both of the proposed lots (Fig. 2). This vegetation type is classified as ***Malosma laurina* Shrubland Alliance** based on its species composition: laurel sumac (*Malosma laurina*), coast sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and black sage (*Salvia mellifera*), with a number of other woody shrubs. Coast live oak (*Quercus agrifolia*), elderberry (*Sambucus nigra*), Southern California black walnut (*Juglans californica*) are scattered throughout this community as single trees or small clumps of trees. Native needle grass (*Stipa* sp.), is a common understory plant, especially along the interface between scrub and grassland on-site.

Coastal sage scrub here is highly disturbed. A large number of invasive, non-native trees, including two species of eucalyptus (*Eucalyptus globulus* and an unidentified eucalypt tentatively identified as red ironbark, *E. sideroxylon*), Victorian box (*Pittosporum undulatum*), European olive (*Olea europaea*), and pepper tree (*Schinus molle*). These trees are scattered throughout coastal sage scrub on both lots, with eucalyptus being the most common species. Most of the eucalypts and other trees here were scorched in the Thomas Fire (December 2017) and are dead or severely diseased (see photos in Appendix 1). Plants found in this plant community are listed in Appendix 2.

oast Live Oaks. Coast live oak trees are scattered throughout coastal sage scrub on both lots and occur as isolated trees or clumps of trees interspersed with blue gum eucalyptus trees along the eastern and northern portions of Lot 2 (Fig. 2). The understory in these isolated oak patches is mostly barren but supports a few native shrubs, such as toyon (*Heteromeles arbutifolia*) and Southern California black walnut (see photos in Appendix 1). Many of the trees in both areas exceed 4 inches dbh (trunk diameter at breast height [4 ft above ground]) and thus are considered sensitive biological resources by County statute (County of Santa Barbara, 2004; 2008).

Ornamental Vegetation. A few ornamental species are patchily distributed across both lots as a result of either escaping from cultivation or having been intentionally planted as landscaping. Many of the non-native tree species that were originally planted as ornamentals have escaped cultivation and are spreading through coastal sage scrub habitat west and northwest of the proposed building envelopes on both lots (e.g., two species of *Eucalyptus*, pepper tree, Victorian box, and myoporum) (Fig. 2). Appendix 2 lists ornamental species found on the two proposed lots.

4.2 Environmentally Sensitive Habitat (ESH).

Coastal Sage Scrub. The Toro Canyon Community Plan lists coastal sage scrub as Environmentally Sensitive Habitat (ESH) on the ESH Area-Toro Canyon (ESH-TCP) Overlay for inland areas (County of Santa Barbara, 2004). Additionally, coastal sage scrub (Diegan series), which occurs on-site, is considered 'sensitive' by the State of California (Holland, 1986). Coastal sage scrub habitat on-site also supports stands of Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), a California Native Plant Society (CNPS) List 1B.1 species (rare, threatened, or endangered in California) (Table 3; Fig. 4; Tibor, 2001). As noted in the previous section, coastal sage scrub here is fragmented and disturbed and has been invaded by non-native trees (eucalyptus, Victorian box, etc.). Coastal sage scrub does not occur within the Building and Development Envelopes on either Lot 1 or Lot 2, but an area encompassing approximately 29,445 sf (0.68 acres) within the FFMZs for both lots supports a mixture of patches of disturbed coastal sage scrub and these non-native trees (Fig. 3).

Native Grasses. The Santa Barbara County Planning & Development Department (2004; 2008), defines native grasslands on the basis of relative percent cover, *"Native grasslands which are dominated by perennial bunch grasses such as purple needlegrass (Stipa pulchra) tend to be patchy (the individual plants and groups of plants tend to be distributed in patches). Therefore, for example, where a high density of small patches occurs in an area of one acre, the whole acre should be delineated if native grassland species comprise 10 percent or more of the total relative cover, rather than merely delineating the patches that would sum to less than one acre." Removal or disturbance to a patch or patches of native grasses less than 0.25 acres, which is clearly isolated and is not part of a significant native grassland or an integral component of a larger ecosystem, is usually considered insignificant."* (County of Santa Barbara, 2008). Needle grass populations that meet the County's relative cover criteria for 'native grassland', i.e., greater than 10% cover of native grasses, have previously been documented in Toro Canyon, including several acres along upper Toro Canyon Road (800 and 900 blocks) (Philbrick, 1990, as cited in County of Santa Barbara, 2004). These areas are not shown on the ESH map in the Toro Canyon Community Plan because of the scale of the mapping effort.

Figure 2. Vegetation on subject lots (Lot 1 at left; Lot 2 in center and right): non-native annual grassland (white) and coastal sage scrub (purple). Uncolored area on right side of image is open, eucalyptus-dominated woodland with scattered coast live oaks and a patchy understory of ruderal, non-native annual grassland and coastal sage scrub. Individual coast live oaks around proposed Building Envelopes are indicated by white dots. Vista Linda Lane is at left; Toro Canyon Road runs along bottom of image. North is to upper right. Imagery dated 12 April 2018.

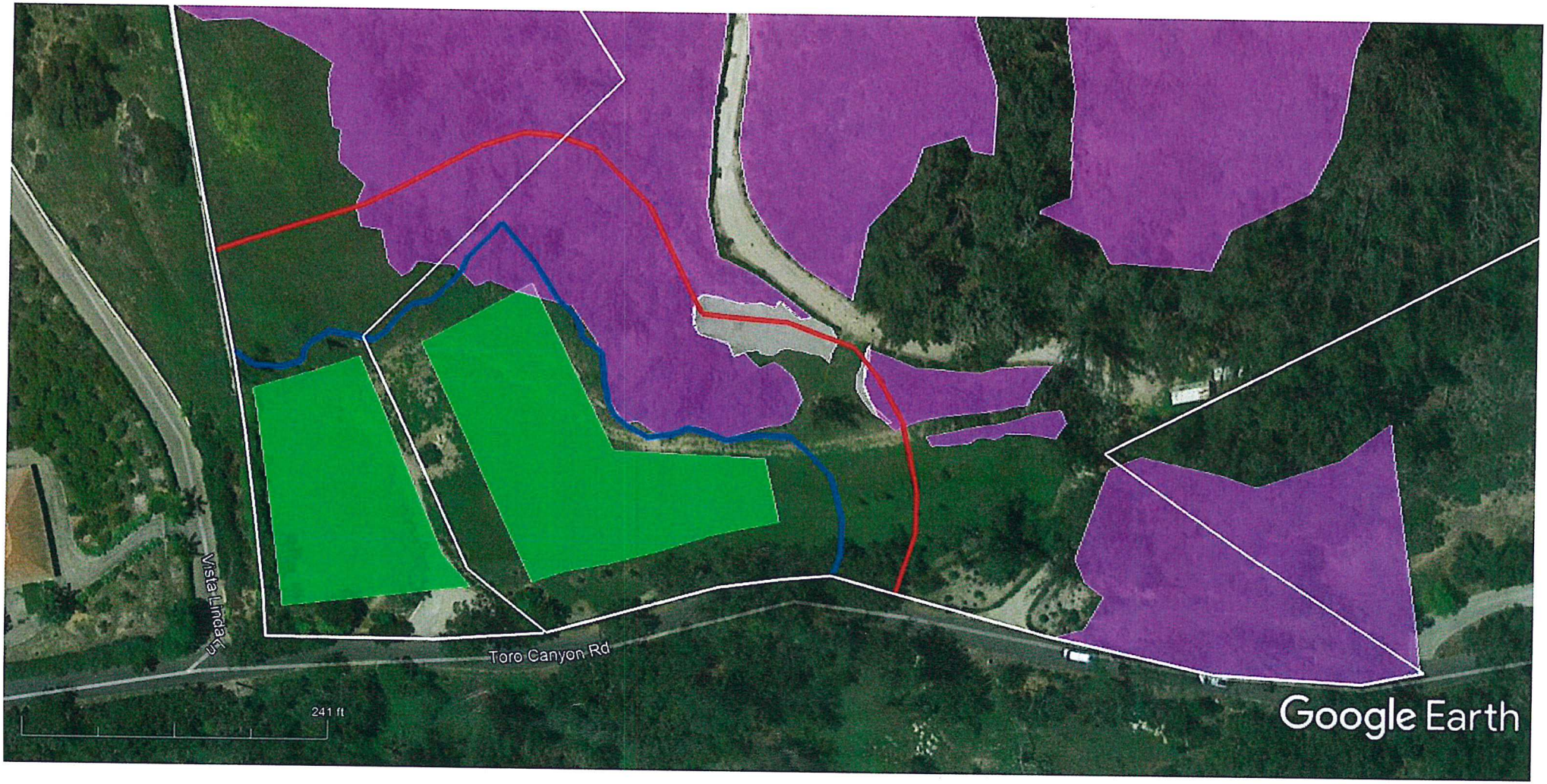

Figure 3. Occurrence of ESH in vicinity of subject lots (Lot 1 at left; Lot 2 at right): coastal sage scrub (purple); needle grass (*Stipa* sp.) (white polygons). Uncolored areas on right side of image are open, eucalyptus-dominated woodland with scattered coast live oaks and a patchy understory of ruderal, non-native annual grassland and coastal sage scrub. Building Envelopes are shown in green; Development Envelopes are outlined in blue. The 100-foot fire fuel management zone around Building Envelopes is indicated by the red line. Parcel boundaries are indicated by the white lines. Toro Canyon Road runs along bottom of image. North is to upper right. Imagery dated 12 April 2018.

Needle grass was not found within the Building and Development Envelope or FFMZ on Lot 1 (Fig. 3; Table 2). Patches that appear to exceed the minimum percent cover for classification as 'native grassland' and Environmentally Sensitive Habitat (ESH) occur within the FFMZ on Lot 2, and total approximately 2,110 sf (0.05 acres) (Fig. 3; Table 2).

Table 2. Occurrence of Needle Grass (*Stipa* sp.) on Lots 1 and 2 (Fig. 3).

Lot	Occurrence w/in Building Envelope	Occurrence w/in Development Envelope	Occurrence w/in 100-foot FFMZ	Total
1	0	0	0	**0**
2	0	Individual plants (not ESH)	2,110 sf (0.05 acres) (ESH)	**2,110 sf (0.05 acres) (ESH)**

4.3 Special-Status Species. Table 3 lists special-status plants and wildlife found in the project region (CDFW, 2018).

Table 3. Special-Status Plants and Animals in Project Region.

COMMON NAME	SCIENTIFIC NAME	REGULATORY STATUS (*)	HABITAT ASSOCIATIONS	LIKELIHOOD OF OCCURRENCE IN PROJECT AREA
PLANTS				
Santa Barbara locoweed	*Astragalus trichopodus* var. *trichopodus*	Locally Sensitive	Oak-sycamore riparian woodland; coastal bluff scrub	Low potential; lack of suitable habitat.
White-veined monardella	*Monardella hypoleuca* ssp. *hypoleuca*	1B	Occurs in woodland and chaparral from 165-4,700 feet.	Moderate potential in coastal sage scrub; found in chaparral at San Marcos Pass and in woodland and chaparral above Santa Barbara and Montecito (CNDDB, 2018).
South Coast branching phacelia	*Phacelia ramosissima* var. *austrolitoralis*	3	Occurs in coastal sage scrub and woodland/chaparral from 15-1,000 feet.	Moderate potential in coastal sage scrub; found in scrub and woodland/chaparral above Santa Barbara and Montecito (CNDDB, 2018).
Michael's rein orchid	*Piperia michaelii*	4	Coastal sage scrub and chaparral from 10-3,000 feet.	Moderate potential in coastal sage scrub.
Sonoran maiden fern	*Thelypteris puberula* var. *sonorensis*	2B	Occurs along creeks and mesic canyons from 160-2,000 feet.	Low potential in coastal sage scrub.
Plummer's baccharis	*Baccharis plummerae*	List 4	Coastal sage scrub, chaparral, oak woodland, typically on cool-moist, north-facing slopes, but found in many shaded canyons on south slope of	Coyote bush (*B. pilularis*) occurs on-site; *B. plummerae* prefers cool, shaded canyons. Low to no potential.

			Santa Ynez Mtns.	
Long-spined spineflower	*Chorizanthe polygonoides* var. *longispina*	1B	Occurs in dry, open chaparral from 100-4,500 feet.	Low potential in coastal sage scrub; found in chaparral above Montecito (CNDDB, 2018; CalFlora, 2018).
Mesa horkelia	*Horkelia cuneata* subsp. *puberula*	List 1B	Chaparral, oak woodland, coastal sage scrub, and sandhill scrub on sandy soils along South Coast and sand dunes in western Santa Barbara County	Low to moderate potential; soils on-site generally not suitable.
Santa Barbara bedstraw	*Galium cliftonsmithii*	List 4	Chaparral and oak woodland	Low to moderate potential for occurring in open oak woodland in coastal sage scrub on-site.
Santa Barbara honeysuckle	*Lonicera subspicata* var. *subspicata*	List 1B	Coastal sage scrub and oak woodlands, endemic to south slope of Santa Ynez Mountains	**Observed.** Extensive patches of this species are scattered throughout coastal sage scrub on Lot 2.
South Coast Range morning-glory	*Calystegia collina* ssp. *venusta*	List 4	Oak woodland, chaparral, and coastal scrub	Moderate to high potential of occurring in chaparral on-site.
Nuttall's scrub oak	*Quercus dumosa*	List 1B	Coastal sage scrub and chaparral along south coast of Santa Ynez Mountains from Montecito to Goleta area	No scrub oaks observed in coastal sage scrub or grassland on either lot; moderate potential elsewhere in CSS on Lot 2.
Hoffmann's gooseberry	*Ribes amarus* var. *hoffmannii*	List 3	Chaparral and riparian woodland along south slope Santa Ynez Mtns from Montecito to Gaviota Pass	Low potential in coastal sage scrub on-site.
Humboldt lily	*Lilium humboldtii* ssp. *ocellatum*	List 4	Chaparral, coastal sage scrub, and riparian woodland	Low potential for occurring in coastal sage scrub on-site.
INVERTEBRATES				
Monarch butterfly	*Danaus plexippus*	CSC (State Insect)	Overwinters (October-April) in dense roosts in eucalyptus woodland and, to a lesser degree, sycamore-oak woodland, generally in association with drainages; several known overwintering and autumnal roosts in region, but none reported from near project area	No autumnal or overwintering roosts known from vicinity; no monarchs observed on-site during survey. Eucalyptus trees on-site in or near development envelope and FFMZ on Lots 1 and 2 are single trees. Dense clump of eucalyptus occurs in northern portion of Lot 2 but trees were severely damaged by Thomas Fire in 2017 and are dead or dying.
Shoulderband snails	*Helminthoglypta* spp.	Locally Sensitive	Occurs in leaf/stick litter and other mesic microhabitats in coastal sage scrub and oak woodland	One or more species likely to occur in coastal sage scrub on-site, but status of these species is poorly known.
AMPHIBIANS				
South Cost newt	*Taricha torosa torosa*	CSC	Resident in scour pools and runs in several perennial drainages along South Coast; restricted to upper watersheds in developed areas.	Known from upper watersheds of several creeks in Montecito area (CDFW, 2018), and may occur in upper watershed of Toro Cyn Creek; no potential to occur on-site due to distance from Toro Canyon Creek.

California red-legged frog	*Rana draytonii*	FT; CSC	Resident in perennial streams, seeps in several South Coast drainages.	Known from upper watersheds of several creeks in Montecito area (CDFW, 2018), and may occur in upper watershed of W Fork Toro Cyn Creek; low to no potential to occur on-site due to distance from Toro Canyon Creek.
REPTILES				
California legless lizard	*Anniella pulchra* (= *A. stebbinsi*)	CSC	Known from sandstone-derived soils in Santa Barbara area	Low potential for occurring generally on-site because soils are too dense, but may occur in woodrat nest in SE corner of Lot 2 where looser soils are found.
Two-striped garter snake	*Thamnophis hammondii*	CSC	Resident in perennial and seasonal aquatic habitats in riparian woodland, riparian scrub, and adjacent scrub habitats	Likely occurs in Toro Canyon Creek riparian corridor and may range into woodland and scrub habitats on-site.
BIRDS				
White-tailed kite	*Elanus leucurus*	FP	Resident in grassland and oak savanna in region; may form communal roosts in oak and willow woodland	Fall/winter communal roosts observed in oak woodland in upper watershed of Toro Canyon Creek in 1990s (Holmgren and Rindlaub, as cited in County of Santa Barbara, 2004), but current status unknown. No suitable roosting habitat on-site.
Cooper's hawk	*Accipiter cooperi*	CSC	Resident in oak riparian woodland throughout region	Expected to occur on-site (foraging and possible nesting) in oaks and eucalyptus trees, especially on Lot 2.
Sharp-shinned hawk	*Accipiter striatus*	CSC	Winter visitor to oak and riparian woodlands throughout region	May occur in oaks and eucalyptus woodland on-site during fall and winter months (Sept-Apr)
Allen's hummingbird	*Selasphorus sasin*	CSC (nesting)	Uncommon spring migrant to shrublands and woodlands along south slope of Santa Ynez Mtns.	Moderate to high potential to feed and possibly nest in coastal sage scrub and ornamental vegetation on-site.
Pacific slope flycatcher	*Empidonax difficilis*	CSC	Uncommon to fairly common spring and summer migrant to riparian woodland throughout region	Moderate to high potential to occur and nest in oaks in coastal sage scrub vegetation on-site.
MAMMALS				
Red bat	*Lasiurus blossevillii*	CSC	Migratory species; may overwinter along coast	Moderate potential to occur on-site in fall and winter; known from temporary (daytime) roosts at several locations in Montecito (CDFW, 2018).
San Diego desert woodrat	*Neotoma lepida intermedia*	CSC	Rock outcrops in open chaparral and coastal sage scrub along coastal slope of Santa Ynez Mtns	Known from area, but no suitable habitat on-site. Occupied big-eared woodrat (*N. macrotis*) nest found in SE corner of Lot 2.
American badger	*Taxidea taxus*	CSC; FPF	Several observations along south slope of Santa Ynez Mountains	Moderate potential of occurrence in coastal sage scrub and open woodland habitat on and around site; no sign (tracks, scat, burrows, digs) found on-site.
Ringtail	*Bassariscus astutus*	FPF	Occurrence poorly known because of secretive habits, but likely occurs in middle	Moderate to high potential of occurring on-site in coastal sage scrub and open woodland.

			and upper portions of coastal watersheds throughout the south slope of the Santa Ynez Mtns.	
Mountain lion	*Felis concolor*	FPF	Relatively common, but highly secretive, in middle and upper watersheds along south slope of Santa Ynez Mtns.	Known from several recent sightings in Montecito and Carpinteria foothills; moderate to high potential of occurring on-site as part of larger home range.

(*) Key:

Plants: CNPS (California Native Plant Society; Tibor, 2001):

List 1B = plants considered rare, threatened, or endangered in California and elsewhere by CNPS and CDFW
List 2 = plants rare, threatened, or endangered in California but more common elsewhere by CNPS and CDFW
List 3 = Uncommon to rare species for which more information is needed to determine regulatory status.
List 4: Plants of limited distribution; a "watch" list
Locally Sensitive Plants: plants with limited local distributions (*Smith, 1998 and Santa Barbara Botanic Garden, 1988).*

Animals:

FT = Listed as Threatened under the Federal Endangered Species Act (U.S. Fish and Wildlife Service)
CSC: California Species of Special Concern (California Department of Fish and Wildlife), and protected by the California Environmental Quality Act
FP = Fully Protected (California Department of Fish and Wildlife)
FPF: Fully Protected Furbearer – California Department of Fish and Wildlife Code.

Sources: CNDDB (2018) for the Carpinteria, Santa Barbara, Old Man Mountain, and Wheeler Springs quadrangles; relevant environmental documents for region; L.E. Hunt field observations and www.calflora.org.

Plants. Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), a CNPS List 1B species (rare, threatened, or endangered in California and elsewhere), is scattered throughout coastal sage scrub habitat on Lot 2, and as individual plants north of the development envelope on Lot 2 (Fig. 4; Appendix 1). Individual mature coast live oaks are considered to be sensitive resources in the Toro Canyon Community Plan (County of Santa Barbara, 2004; 2008a).

Wildlife. No special-status wildlife were observed during the site visit, but a number of species may occur there based on the presence of suitable habitat on-site and known observations in the vicinity of the project site (Table 3). Despite habitat fragmentation on-site and low-density residential development in the area, a large amount of open space and relatively undisturbed habitat occurs within and around the project site. The large number of mature coast live oaks, eucalyptus, and other ornamental trees on both lots provides suitable roosting and possibly nesting habitat for raptors, such as Cooper's hawk, sharp-shinned hawk, white-tailed kite, and owls. However, the Thomas Fire in December 2017 scorched or burned a large number of eucalyptus trees across both lots and these trees are dead or dying (see photos in Appendix 1).

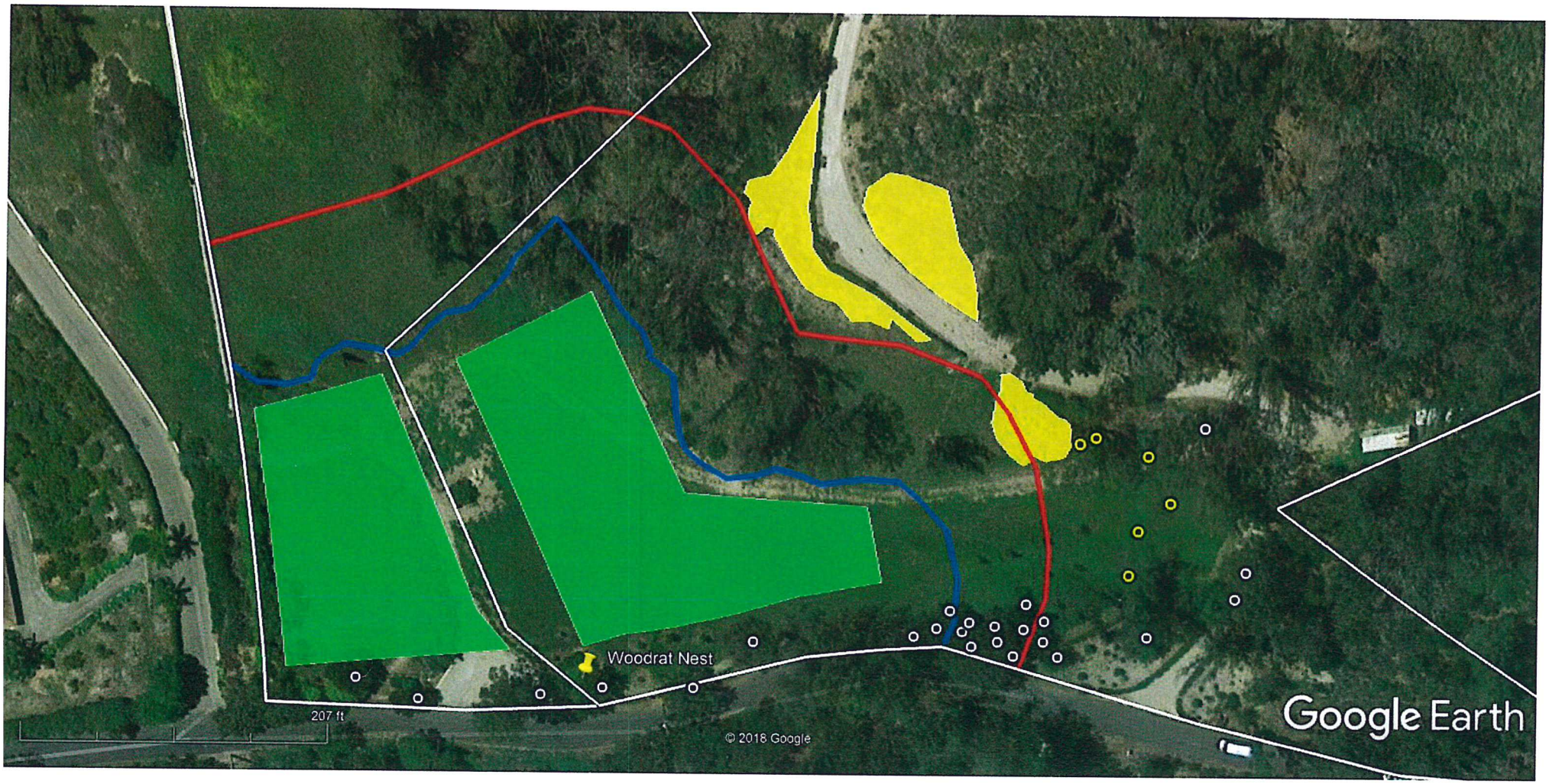

Figure 4. Occurrence of special-status species in vicinity of proposed lots (Lot 1 at left; Lot 2 at center and right): Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*) (yellow polygons and yellow dots); coast live oaks (*Quecus agrifolia*) (white dots); big-eared woodrat (*Neotoma macrotis*) nest shown by marker in SE corner of Lot 2. Occurrence of SB honeysuckle on entirety of Lot 2 was not mapped, only those patches within 50-100 feet of the FFMZ. Approximately 420 sf of SB honeysuckly occurs within the 100-foot FFMZ on Lot 2. Coast live oaks are scattered throughout coastal sage scrub habitat west and north of the development envelope on both lots, but cannot be distinguished from eucalyptus trees at this scale. Building envelopes are shown in green; development envelopes are outlined in blue. The 100-foot fire fuel management zone around the building envelopes is indicated by red line. Parcel boundaries are indicated by white lines. Toro Canyon Road runs along bottom of image. North is to upper right. Imagery dated 12 April 2018.

A large stick nest constructed by the big-eared woodrat (*Neotoma macrotis*), a common inhabitant of woodland and scrub habitats throughout the region, occurs in the SE corner of Lot 2 (Fig. 4; see photos in Appendix 1). The size of the nest indicates that it has been here for years. Although not protected by local or State statutes, the nest of this species, particularly long-standing nests such as this occurrence, provides suitable microhabitat for a number of special-status species, such as shoulderband snails (*Helminthoglypta* spp.), legless lizards (*Anniella* sp.), two-striped garter snake (*Thamnophis hammondii*), as well as a refuge for a host of other commensal species. As such, these nests are foci of local biodiversity (Hunt, pers. observ.), and thus qualify as a special-status habitat feature, per County guidelines (County of Santa Barbara, 2008).

5.0 Impact Analysis and Mitigation Measures. Build-out of the proposed Building and Development Envelopes on Lots 1 and 2 will not directly impact sensitive biological resources because these envelopes have been sited in non-native annual grassland that has been disturbed by previous development. Potentially significant impacts may arise from required fire fuel management practices. The Development Envelope on Lot 2 abuts coastal sage scrub habitat that has been fragmented and disturbed by invasive, non-native trees, so the required 100-foot Fire Fuel Management Zone (FFMZ) around the Building Envelope on Lot 2 has the potential to significantly impact special-status plants and Environmentally Sensitive Habitat (ESH).

Impact BIO-1: ***Grading, construction, and/or fire fuel management practices on Lot 2 could disturb or eliminate at least 420 sf of Santa Barbara honeysuckle, a List 1B.1 species that is classified as rare, threatened, or endangered in California and elsewhere by the California Native Plant Society and California Department of Fish and Wildlife) (Fig. 4). This is a Class II impact (significant, but can be mitigated to less than significant levels).***

Mitigation Measure BIO-1a (Map Species Occurrence on Construction Plans): The location and extent of SB honeysuckle plants (see Fig. 4), shall be shown on all construction plans and landscaping plans and flagged for avoidance during construction and landscaping.

Mitigation Measure BIO-1b (Delimit work areas): The limits of the Development Envelope and the 100-foot FFMZ around the Development Envelope shall be fenced with orange construction fence prior to any ground disturbance.

Mitigation Measure BIO-1c (Species Avoidance During Fire Fuel Management Activities): Because SB honeysuckle patches are discrete and not distributed throughout the FFMZ on Lot 2, fire fuel management practices should avoid removing this species (Fig. 4). The limits of the 100-foot FFMZ shall be permanently staked with rebar or other permanent markers in the field so that personnel conducting fire fuel management activities do not exceed the vegetation management boundaries. SB honeysuckle stands shall be permanently staked or fenced for avoidance during vegetation management.

Impact BIO-2: ***Fire fuel management practices on Lot 2 will impact disturbed coastal sage scrub within a 0.68-acre area, and up to 2,110 sf (0.05 acres) of native needle grass that appears to meet the criteria for classification as 'native grassland'. Both of these habitats are listed as Environmentally Sensitive Habitat (ESH) by the County of Santa Barbara (2004;***

2008) and by the California Department of Fish and Wildlife (2018), because they support high biodiversity, including a number of special-status species. This is a Class II impact (significant, but can be mitigated to less than significant levels).

Additionally, fire fuel management practices used to create and maintain a 100-foot wide "defensible space" around the Building Envelopes on each lot could significantly impact native plant communities by creating conditions favoring the spread of invasive, non-native species, particularly fountain grass (*Pennisetum* sp.), which already occurs on-site. If not controlled, fountain grass and other non-native grasses could proliferate. Once established, these non-native grasses prevent native shrubs and grasses from re-colonizing. Habitats dominated by non-native, annual grasses are significantly more prone to fire than coastal sage scrub and of substantially lower habitat quality for native plants and wildlife.

Mitigation Measure BIO-2a (Delineate FFMZs): Prior to Land Use Permit issuance, the limits of the 100-foot fire fuel management zone (FFMZ) on both lots shall be permanently marked with rebar or other metal stakes to delineate the zone during future fire fuel management activities.

Mitigation Measure BIO-2b (Fire Fuel Management and Habitat Improvement Plan): Fire fuel management practices that are indiscriminately applied to Lot 2 could disturb up to 0.68 acres within the 100-foot FFMZ that supports disturbed coastal sage scrub (including patches of SB honeysuckle--see Impact BIO-1), and 0.05 acres of needle grass grassland. Both of these habitats are listed as Environmentally Sensitive Habitat by the County of Santa Barbara (2004; 2008). Policy BIO-TC-1 in the Toro Canyon Community Plan requires mitigating impacts to ESH at a 3:1 ratio, which equals approximately 2.04 acres of coastal sage scrub and 0.15 acres of native grassland. Coastal sage scrub habitat on Lots 1 and 2 are thoroughly infested with dead and dying eucalyptus trees and other non-native trees, as well as non-native grasses. These invasive species are degrading the value of these habitats for native plants and wildlife.

Prior to Land Use Permit issuance, a qualified biologist shall prepare a Fire Fuel Management and Habitat Improvement Plan that specifically addresses the methods to be used to protect ESH (coastal sage scrub habitat, SB honeysuckle, and native grassland) within the FFMZ during fire fuel management operations. The Plan shall address how native vegetation within the FFMZs on both lots will be modified, methods and measures to be implemented to selectively remove and control the spread of invasive, non-native grasses and shrubs, and selective removal of dead and dying non-native trees. Plan goals shall balance maximizing habitat values with fire safety.

The Plan shall include procedures for improving the quality of coastal sage scrub habitat by removal and control of non-native grasses and shrubs and selective removal of dead and dying eucalyptus and other non-native trees. Non-native vegetation shall be controlled so that native shrubs and trees can naturally recolonize these areas. The goal of the Plan shall be improving habitat quality of coastal sage scrub by removing dead and dying non-native trees and controlling invasive, non-native grasses, in order to allow native, locally-occurring shrubs and trees to recolonize areas formerly infested with non-native vegetation. There is more than enough disturbed coastal sage scrub on Lot 2 to meet the 3:1 mitigation requirement. The Plan shall be

submitted to County P&D for review and comment and the Plan should be reviewed by the local Fire Marshall for consistency with fire fuel management practices.

Mitigation Measure BIO-2c (Landscaping Species): Prior to issuance of the land use permit, a qualified biologist shall review the proposed species palette on all landscaping plans to ensure that native, locally-occurring species are incorporated into the landscaping plan and that the planting palettes do not include invasive, non-native species.

Impact BIO-3: ***Construction and/or landscaping could destroy a large woodrat nest located in the SE corner of Lot 2. The nests of this native mouse provides suitable microhabitat for a number of special-status wildlife species, including shoulderband snails, California legless lizards, and/or two-striped garter snakes. This is a Class II impact (significant, but can be mitigated to less than significant levels).***

Mitigation Measure BIO-3a: If the nest can be avoided, it shall be surrounded with orange construction fence for the duration of construction and landscaping under the supervision of a qualified biologist. If not, a qualified biologist shall be retained to dismantle the nest and capture and relocate all inhabitants to suitable habitat nearby.

Impact BIO-4: ***Construction, landscaping, and/or fire fuel management practices could remove or damage mature coast live oak trees, eucalyptus trees, and other ornamental trees that may be used as foraging, roosting, and/or nesting habitat, particularly Cooper's hawk, sharp-shinned hawk, Allen's hummingbird, white-tailed kite, Pacific Slope flycatcher, and red bats, which are known to occur in the project region. This is a Class II impact (significant, but can be mitigated to less than significant levels).***

Mitigation Measure BIO-4a: A qualified biologist shall survey any mature trees that are proposed for removal or trimming prior to commencing work. Particular trees that are routinely used by these species as roosting or nesting habitat or that contain active nests, shall be avoided.

Mitigation BIO-4b: A qualified biologist shall conduct a pre-construction survey of both lots no more than one week prior to initial vegetation grubbing and shall monitor initial grubbing and grading to salvage wildlife disturbed by this activity.

6.0 References.

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APPENDIX 1. SITE PHOTOGRAPHS
(all photographs taken on 10 December 2018)

Proposed Lot 1 (southern) parcel, looking east from western edge of proposed development envelope. Toro Canyon Road is visible at driveway entrance. Parcel supports ruderal, non-native annual grassland; hedges surrounding parcel and driveway are mainly composed of ornamental species, such as European olive and myoporum.

Proposed Lot 1, looking northwest from center of parcel. Proposed development envelope extends approximately to the Italian cypress in distance; 100-foot fire fuel management zone around envelope extends upslope into ruderal grassland and coastal sage scrub vegetation and trees in distance.

Southwestern portion of proposed Lot 2 (northern) parcel, looking west from center of parcel. Primary vegetation type on parcel is ruderal, non-native annual grassland. Proposed development envelope extends westward to boundary of woody vegetation in background; fire fuel management zone extends well into woodland.

Southwestern portion of proposed Lot 2, looking east from west of development envelope. Lot 1 is off right side of photo. Proposed building envelope ends at boundary between mowed grassland in background and unmowed grassland in foreground; development envelope extends eastward to about the bottom of the photograph.

Northern half of proposed Lot 2, looking north from center of parcel, showing primary vegetation: ruderal, non-native annual grassland. Proposed development envelope extends northward to beyond the staked trees at right and borders the vegetation at left.

Lo 2, looking south from approximate center of building envelope. Vegetation in building envelope and development envelope is classified as non-native annual grassland.

Five-foot high nest of big-eared woodrat (*Neotoma macrotis*) in dense clump of Southern California black walnut (*Juglans californica)* and toyon (*Heteromeles arbutifolia*) in SE corner of Lot 2 where driveway meets Toro Canyon Road (Fig. 4).

Sparse needle grass (*Stipa* sp.) growing in northern portion of proposed development envelope of Lot 2. This density does not meet minimum percent cover criterion of 10% and is not classifiable as Native Grassland.

Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), a CNPS List 1B species, growing north of proposed development envelope boundaries of Lot 2.

Coast live oak woodland/eucalyptus woodland with coastal sage scrub understory west of proposed development envelope on Lot 2. Fire fuel management zone around proposed building envelope extends well into this habitat. Woody shrubs visible in lower left foreground and center background around trees are Santa Barbara honeysuckle, a CNPS List 1B species. Vegetation clearing and mulching is evident in foreground.

Patches of needle grass growing with non-native annual grasses west (upslope) of proposed development envelope in Lot 2 showing higher density of individual clumps that potentially meet relative percent cover criterion for classification as Native Grassland (ESH). These patches are in the 100-foot fire fuel management zone around the building envelope on Lot 2.

APPENDIX 2. PLANTS OBSERVED ON-SITE (10 December 2018)

Appendix 2. Plants Observed During Site Visits. The following plant species were observed on one or both of the proposed lots during the site visit conducted on 10 December 2018. Species are listed alphabetically by scientific name; native species are bolded.

***Bromus diandrus* Semi-Natural Herbaceous Stand (Non-Native Annual Grassland of Holland, 1986):**

***Asclepias fasciculatus* (narrow-leaved milkweed)**
Asphodelus fistulosus (onionweed)
Brassica nigra (black mustard)
Bromus diandrus (ripgut brome)
Bromus rubens (red brome)
Carduus pycnocephalus (Italian thistle)
Convolvulus arvensis (bindweed)
Cynodon dactylon (Bermuda grass)
Erodium cicutarium (redstem filaree)
Foeniculum vulgare (sweet fennel)
***Heterotheca grandiflora* (telegraph weed)**
***Lonicera subspicata* var. *subspicata* (Santa Barbara honeysuckle)**
Malva nicaeensis (bull mallow)
Marrubium vulgare (horehound)
Oxalis pes-caprae (sour-grass)
Pennisetum sp. (fountain grass)
Picris echioides (bristly ox-tongue)
Piptatherum miliaceum (rice grass)
Plantago lanceolata (English plantain)
Raphanus sativa (wild radish)
Ricinus communis (castor bean)
***Stipa* sp. (needle grass)**
Trifolium sp. (non-native clover)

***Malosma laurina* Shrubland Alliance (Diegan Coastal Sage Scrub of Holland, 1986)**

***Artemisia californica* (coast sagebrush)**
***Artemisia douglasiana* (mugwort)**
***Baccharis pilularis* (coyote bush)**
Bromus diandrus (ripgut brome)
Bromus rubens (red brome)
Carduus pycnocephalus (Italian thistle)
***Ceanothus megacarpus* (bigpod ceanothus)**
***Eriogonum fasciculatum* (California buckwheat)**
Eucalyptus globulus (blue gum)
Eucalyptus cf. E. sideroxylon (red ironbark)
***Hazardia squarrosa* var. *squarrosa* (sawtooth goldenbush)**
***Heteromeles arbutifolia* (toyon)**
***Juglans californica* (Southern California black walnut)**
***Lonicera subspicata* var. *subspicata* (Santa Barbara honeysuckle)**
***Malacothamnus fasciculatus* (chaparral mallow)**
***Malosma laurina* (laurel sumac)**
Olea europaea (European olive)
Pittosporum undulatum (Victorian box)
***Quercus agrifolia* (coast live oak)**
***Rhus integrifolia* (lemonade berry)**
***Salvia mellifera* (black sage)**
***Sambucus nigra* (elderberry)**

Schinus molle (pepper tree)
***Stipa* sp. (needle grass)**
***Toxicodendron diversilobum* (poison oak)**

Ornamental Vegetation (Planted and/or escaped):

Crassula ovata (jade plant)
Cupressus sempervirens (Mediterranean cypress)
Eucalyptus globulus (blue gum)
Eucalyptus cf. E. sideroxylon (red ironbark)
Hedera helix (European ivy)
Myoporum laetum (myoporum)
Nerium oleander (oleander)
Olea europaea (European olive)
Osteospermum sp. (African daisy)
Pelargonium sp. (geranium)
Pinus sp. (unidentified pine)
Pittosporum undulatum (Victorian box)
Schinus molle (pepper tree)
Unidentified hedge-forming shrub
Vinca sp. (periwinkle)