

Hunt & Associates Biological Consulting Services

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Subject: Modifications to Environmentally Sensitive Habitat (ESH) Areas and Recommendations for Fire Fuel Management Practices, APNs 155-230-007 and -018, Toro Canyon Road, Santa Barbara County, California.

Hunt & Associates prepared a Biological Evaluation for a proposed lot split of the subject parcels on 31 January 2019. That document mapped vegetation within the proposed development envelopes and within the 100-foot fire fuel management zones around the envelopes. Approximately 29,445 square feet (0.68 acres) of coastal sage scrub, a plant community classified as Environmentally Sensitive Habitat (ESH) by the County and California Department of Fish and Wildlife (CDFW), was mapped within these areas at that time (January 2019) (Table 1). The distribution and phenology of vegetation at that time was still strongly influenced by the combined effects of the Thomas Fire of December 2017 and severe, multi-year drought (2011-2019).

Vegetation within these fire fuel management areas was re-mapped based on a site visit on 4 April 2019 (Fig. 1), for two reasons: a) to update and more accurately portray the distribution of plant communities, particularly coastal sage scrub (ESH), at the height of the growing season during an above-average rainfall year, and; b) because recent removal of dead eucalyptus trees and eucalyptus duff (bark, branches, leaves) from a portion of the fire fuel management zone revealed little or no understory of coastal sage scrub, as originally reported in the Biological Evaluation.

Table 1. Updated areal estimate of ESH (coastal sage scrub and native grasses).

Vegetation Type	Biological Evaluation (December 2018 and January 2019)	Current Conditions (4 April 2019)
Coastal Sage Scrub (ESH)	29,445 sf (0.68 acres)	11,100 sf (0.25 acres)
Native Grasses (ESH)	2,110 sf (0.05 acres)	2,110 sf (0.05 acres)

Areas mapped as supporting concentrations of native grasses (*Stipa* sp.) remain unchanged from January 2019 to the present time. However, the extent of coastal sage scrub (ESH) within the 100-foot fire fuel management zone around the Building Envelopes on Lots 1 and 2 has significantly decreased. Areas north of the BE on Lot 2 supported remnants of what appeared to

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Figure 1. Revised ESH map based on conditions existing on 4 April 2019. Lot boundaries are shown by white lines (Lot 1 at left; Lot 2 at right); Building Envelopes are shown in green; Development Envelope boundaries are shown by blue line; 100-foot Fire Fuel Management limits from Building Envelopes is shown by red line. Vegetation: coastal sage scrub (ESH): purple; native grass concentrations (ESH): white; uncolored areas show non-native vegetation (ruderal, ornamental, eucalyptus-dominated woodland with scattered coast live oaks and a patchy understory of coastal sage scrub). Toro Canyon Road runs along bottom of image. North is to upper right. Imagery dated. 12 April 2018.

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be coastal sage scrub shrubs in January 2019 and these were mapped as coastal sage scrub (ESH). It was thought that these remnant shrubs would re-sprout in time. They did not and these areas are now dominated by non-native annual grasses.

Areas northwest and west of the BEs on Lots 1 and 2 supported a very sparse understory of coastal sage scrub shrubs beneath a canopy dominated by eucalyptus trees. These trees produced a thick duff (bark, leaves, and branches) that prevented native shrubs from colonizing these areas. This duff layer was removed by hand in March 2019 to reveal little to no native shrub understory—bare soil. This area was re-mapped as non-native eucalyptus woodland (Fig. 1), not as ESH. Table 1 gives an updated estimate of the extent of coastal sage scrub (ESH) on Lots 1 and 2 and concludes:

- a) No ESH occurs within the proposed BEs or DEs of either Lot, per conclusions in the 2019 Biological Evaluation, and;
- b) The amount of ESH found within the FFMZs on Lots 1 and 2 is reduced from 29,445 sf (0.68 acres) to 11,100 sf (0.25 acres). Coastal sage scrub is patchy and supports a sparse to dense canopy of eucalyptus that continue to degrade the quality of ESH here.

Recommendations for Protecting ESH within the FFMZs. The Lot Line Adjustment Map prepared by L&P Consultants and dated February 2019, shows the 35-foot, 70-foot, and 100-foot fire fuel management zones around the Building Envelopes on Lots 1 and 2. Recent removal of eucalyptus duff from portions of the FFMZs formerly mapped as ESH (coastal sage scrub) is consistent with habitat restoration efforts recommended in the Biological Evaluation (Hunt & Associates, 2019) and is considered a *Class IV (beneficial) impact*. The following recommendations supplement those made in the Biological Evaluation regarding fire fuel management activities:

- a) A qualified biologist should prepare a Fire Fuel Management Plan for review and comment by the County Fire Marshall. The Plan should contain the following elements:
 - a. Specific recommendations on how to manage native vegetation within the 0-35-foot, 35-70-foot, and 70-100-foot fire fuel management zones. Vegetation management should balance fire safety with maintaining habitat quality for native plants and wildlife.
 - b. Specific recommendations for the removal and control of eucalyptus trees in coastal sage scrub both within and outside of the FFMZs on both lots. Removal of these invasive, non-native species will greatly enhance native habitat quality. Eucalyptus should be cut at ground level and the stumps left in place to avoid unnecessary soil disturbance. Eucalyptus trunks should be scattered on-site to stabilize soils on steep slopes and to create valuable microhabitat for wildlife.
 - c. Eucalyptus duff should be removed by hand (e.g., raking) in order to create sites where native coastal sage scrub shrubs and native trees (e.g., coast live oak) can re-colonize. These cleared areas should be monitored to eradicate and control invasive, non-native herbaceous vegetation.

- b) A qualified biologist should survey eucalyptus and other non-native trees to be removed for nesting birds, per standards developed by the California Department of Fish and Wildlife.
- c) Dead or dying coast live oaks that do not present a safety hazard should be left in place as nesting and roosting habitat for a variety of birds.

Literature Cited

Hunt & Associates Biological Consulting Services. 2019. Biological evaluation of APNs 153-230-017 and 153-230-018, Toro Canyon Road, Santa Barbara County, California. Prep. for Kevin Frampton, Ojai, CA and L&P Consultants, Santa Barbara, CA. 31 January. 27 pp.

Sincerely,

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