4.3 BIOLOGICAL RESOURCES

This section identifies biological resources present on the project site and assesses the project’s impacts on those resources. The discussion of biological resources incorporates the results of a reconnaissance-level survey of the project site conducted by the City’s EIR consultant (see Appendix C), as well as a follow up survey conducted to address issues raised by the California Department of Fish and Wildlife on a Draft EIR comment letter and to confirm the findings of the original survey. The surveys updated the results of previous biological surveys of the site: an Arborist Report (McPherson, 2009), a Biological Assessment (Tierney, 2009), a Non-Wetland Report Clarification (Rindlaub, 2009), and a Biological Resources Update (Rindlaub, 2008). The field reconnaissance survey documented existing site conditions and the potential presence of sensitive biological resources, including sensitive plant and wildlife species, sensitive plant communities, jurisdictional waters and wetlands, and habitat for nesting birds.

4.3.1 Setting

a. Regional Setting. The project site is located within the South Coast region of Santa Barbara County within the Santa Ynez – Sulphur Mountains subsection of the Southern California Coast, an ecological unit that extends from the Santa Ynez River mouth in northern Santa Barbara County, south and east to the Sulphur Mountains in northern Ventura County. This ecological unit is generally defined by its topography and geography. Locally, the Santa Ynez Mountains to the north of the site form relatively steep hillsides vegetated by native chaparral and drained by incised streams along which grow bands of riparian shrubs and woodlands.

The presence and proximity of the 4,000+ feet high Santa Ynez Mountains adjacent to the Pacific Ocean influence climatic conditions by forcing moving air upwards, and causing an increase in precipitation along the South Coastal plain. Annual precipitation in this area ranges from 13 to 18 inches, increasing with elevation, and temperatures range from 45 to 65 degrees Fahrenheit (°F). Summer daytime temperatures are also often modified by morning fog and sea breezes and the growing season lasts 250 to 360 days per year.

Much of the coastal plain in the Goleta area between the Santa Ynez Mountains and Pacific Ocean is developed or has been historically disturbed by agriculture or ranching uses. Relatively undisturbed habitats are present along narrow riparian corridors, in scattered undeveloped lands of varying sizes, and in protected open space areas. The habitats and wildlife resources of the area reflect those typically found within the coastal plains of southern California. Native vegetation within the City of Goleta is fragmented, and consists primarily of riparian and upland woodlands and coastal scrub.

b. Project Site Setting. The project site is bounded on its north by the Union Pacific Railroad (approximately 35 feet north of the project site) and U.S. 101 (approximately 175 feet north of the project site), on its east and west by existing business park developments, and on its south by Cortona Drive and business park development.

Methodology. To identify potential biological resources on the project site, Rincon Consultants conducted an updated review of relevant databases within five miles of the site, including sensitive resource occurrences from the California Department of Fish and Wildlife (CDFW) California Natural Diversity Data Base (CNDDB), Biogeographic Information and Observation System (BIOS – www.bios.dfg.ca.gov), the U.S. Fish and Wildlife Service (USFWS) Critical Habitat Portal
(http://criticalhabitat.fws.gov), and the California Native Plant Society (CNPS) online Inventory of Rare and Endangered Plants of California (California Native Plant Society, 2013). Previous reports for the project site were reviewed including a Biological Resources Update (Rindlaub, 2008), a Biological Assessment (Tierney, 2009), an Arborist Report (McPherson, 2009), and a Non-Wetland Clarification (Rindlaub, 2009). Other sources of information about the site included aerial photographs, topographic maps, climatic data, and project plans. In addition, Rincon reviewed the City of Goleta Zoning Ordinance, the Final EIR General Plan/Coastal Land Use Plan (City of Goleta, 2006), and Santa Barbara County Coastal Zoning Ordinance – Chapter 35, Article II (1997) for determination of Environmental Sensitive Habitat Areas (ESHA) that may be present within the project boundaries.

This analysis incorporates the results of a reconnaissance-level survey within the project site boundary conducted on June 10, 2013 by a Rincon Consultants Senior Biologist and Associate Biologist, as well as a supplemental survey conducted by Rincon on April 22, 2014. The field reconnaissance surveys documented existing site conditions and the potential presence of sensitive biological resources, including sensitive plant and wildlife species, sensitive plant communities, jurisdictional waters and wetlands, and habitat for nesting birds. The results of the surveys were compared to existing biological reports to assess any changes within the project boundary. The field biologists surveyed the project site on foot and recorded the biological resources present onsite such as plant and wildlife species.

As discussed in the Jurisdictional Drainage and Wetland Evaluation (Appendix C), the project site also was inspected to evaluate the presence/absence of waters of the United States (U.S.), including wetlands potentially subject to the jurisdiction of the U.S. Army Corps of Engineers and thus, Section 404 of the Clean Water Act (CWA) ((33 U.S.C. §§ 1251 et seq., 33 C.F.R. §§ 320 and 323). The wetland delineation was conducted in accordance with the Wetlands Delineation Manual (Environmental Laboratory, 1987), Guidelines for Jurisdictional Determinations for Waters of the United States in the Arid Southwest (United States Army Corps of Engineers, 2001), Jurisdictional Determination Form Instructional Guidebook (United States Environmental Protection Agency and United States Army Corps of Engineers, 2007), Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0) (United States Army Corps of Engineers 2008a), A Field Guide to the Identification of the Ordinary High Water mark (OHWM) in the Arid West Region of the Western United States (2008b), and Code of Federal Regulations sections that pertain to factors constituting the ordinary high water mark (OHWM) for non-wetland waters (“other waters”) (33 C.F.R. § 328.3 and 33 C.F.R. § 328.4).

A Senior Biologist and Associate Biologist at Rincon Consultants conducted the jurisdictional drainage and wetland evaluation within the project site on June 10, 2013.

Existing Habitat. The field reconnaissance-level survey confirmed that conditions within the Cortona Apartments project boundaries appear to be the same as during previous site visits in 2008 and 2009. Plant communities observed during the 2013 survey were identified based on A Manual of California Vegetation, Second Edition (Sawyer et al., 2009) while previous surveys were based on the A Manual of California Vegetation (Sawyer and Keeler-Wolf, 1995). Updates to habitat nomenclature are addressed on an individual basis below.

As shown by the site photos in figures 4.3-1 and 4.3-2, the project site is dominated by both native and non-native plant communities including Baccharis pilularis Shrubland Alliance (coyote brush scrub), California Annual Semi-Natural Stand, and California Coastal Upland Cismontane Stand. The
Photograph 1. View looking northwest across the project site. Note recently mowed California annual semi-natural stand dominated by non-native grasses.

Photograph 2. View looking east across the project site. Coyote brush scrub is on the right, existing oak trees and cismontane semi-natural stand at arrow.

Photograph 3. Cismontane semi-natural stand at northeast corner of the site.

Photograph 4. View from north looking south across the site. Existing oak trees are on the left.
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Photograph 5. View looking north from Cortona Road entrance.

Photograph 6. View looking west across the south edge of the coyote brush scrub.

Photograph 7. View looking north at the eastern boundary of the coyote brush scrub.

Photograph 8. View looking north near eastern boundary of coyote brush scrub.
Habitat Map

Project Area

Habitats
- Baccharis pilularis Shrubland Alliance
- California Annual Semi-Natural Stand
- California Coastal Cismontane Stand

Imagery provided by ESRI and its licensors © 2013.
approximate distribution of these habitats within the project site, based on the 2013 survey, is shown in Figure 4.3-3. Within the previous report (Tierney, 2009) only the coyote brush scrub and California Annual Semi-Natural Stand were identified in addition to a Purple Needlegrass Series (Nassella pulchra Herbaceous Alliance in Sawyer et al., 2009). The Purple Needlegrass Series is identified at the southwestern corner of the site and spans about 2,000 square feet. During the 2013 survey, this habitat was observed to cover only about 100 square feet. The central area of the habitat may have contained an expanded population but the area had recently been mowed. Due to its reduced percent coverage, the Purple Needlegrass Series was not identified as a distinct plant community during the 2013 survey. The April 2014 supplemental survey found approximately five isolated clumps of purple needlegrass totaling 0.07 acres (approximately 3,000 square feet) scattered among the California Annual Semi-Natural Stand. This was an increase from the original 100 square foot area identified within the Biological Resources Assessment prepared in 2013; however, the overall acreage (0.07 acres of purple needlegrass) represents only 0.61% of the total site and thus represents less than 10% of the total coverage and less than the 0.25-acre patch size necessary for an ESHA designation.

The dominant plant community present is California Annual Semi-Natural Stands (Ruderal) made up of multiple species of non-native weedy annual grasses and herbs. Plant species found include wild oats (Avena fatua), ripgut brome (Bromus diandrus), red brome (Bromus madritensis ssp. rubens), crabgrass (Digitaria sp.), foxtail (Hordium murinum), mustards (Brassica nigra and Hirschfeldia incana), red-leaved filaree (Erodium cicutarium), and wild radish (Raphanus sativus). Identification to alliance level (a classification level used in Sawyer et al., 2009) was not feasible due to a lack of dominant plant species and recent mowing of the project site which restricted identification of species’ definitive coverage.

Coyote brush scrub habitat is present along the northern and western edges of the project site. This habitat is dominated by coyote brush (Baccharis pilularis) interspersed with open areas dominated by wild radish, blue elderberry (Sambucus nigra ssp. caerulea), and weedy herbs and grasses. California Coastal Upland Cismontane Stand, dominated by native and non-native trees, is located in the northeast and southeast sections of the project site. Trees found within this habitat include coast live oak (Quercus agrifolia), Canary Island palm (Phoenix canariensis), Mexican fan palm (Washingtonia robusta), deodor cedar (Cedrus deodara), and Italian stone pine (Pinus pinea) with an understory dominated by non-native grasses and herbs. As with the oaks, these trees had been identified and assessed in the Arborist Report (see Figure 4.3-4). No new non-native trees were observed during the 2013 survey.

The project site provides habitat for wildlife species that occur in open weedy fields, shrub habitat and tree stands. Bird species observed on-site include: house finch (Carpodacus mexicanus), American crow (Corvus brachyrhynchos), black phoebe (Sayornis nigricans), American goldfinch (Spinus tristis), yellow warbler (Dendroica petechia), northern mockingbird (Mimus polyglottos), western scrub-jay ( Aphelocoma californica), Anna’s hummingbird (Calypte anna), bushtit (Psaltriparus minimus), song sparrow (Melospiza melodia), mourning dove (Zenaida macroura), and red-tailed hawk (Buteo jamaicensis). California ground squirrel (Otospermophilus beechnyi), brush rabbit (Sylvilagus bachmani), and western fence lizard (Sceloporus occidentalis) were also observed.

**Special-Status Plants.** For the purposes of this study, special-status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the United States Fish and Wildlife Service (USFWS) under the federal Endangered Species Act (7 U.S.C. § 136, 16 U.S.C. § 1531 et seq.); those listed or proposed for listing, or candidates for listing as rare, threatened, or endangered by the California Department of Fish and Wildlife (CDFW) under the state Endangered Species Act; animals designated as “Fully Protected,” “Species of Special Concern,” or “Rare,” by the
Existing Trees on the Project Site

- Coast Live Oak
- Deodar Cedar
- Canary Island Palm
- European Olive
- Italian Stone Pine

Source: McPerson, Arborist Report, 2009

Figure 4.3-4

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CDFW; and those species on the Special Vascular Plants, Bryophytes, and Lichens List (CDFG, 2010). This latter document includes the California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants of California, Seventh Edition (http://cnps.site.aplus.net/cgi-bin/inventory.cgi) as updated online. Those plants contained on the CNPS Lists 1, 2, 3, and 4 are considered special-status species in this EIR, per the CNPS code definitions:

- **List 1A** = Plants presumed extinct in California;
- **List 1B.1** = Rare or endangered in California and elsewhere; seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat);
- **List 1B.2** = Rare or endangered in California and elsewhere; fairly endangered in California (20-80% occurrences threatened);
- **List 1B.3** = Rare or endangered in California and elsewhere, not very endangered in California (<20% of occurrences threatened or no current threats known);
- **List 2** = Rare, threatened or endangered in California, but more common elsewhere;
- **List 3** = Plants needing more information (most are species that are taxonomically unresolved; some species on this list meet the definitions of rarity under CNPS and CESA);
- **List 4.2** = Plants of limited distribution (watch list), fairly endangered in California (20-80% occurrences threatened); and
- **List 4.4** = Plants of limited distribution (watch list), not very endangered in California (<20% occurrences threatened or no current threats known).

A search of the CNDDB records identified 12 special-status plant species tracked within 5 miles of the project site. The 12 special-status plant species are found in chaparral, coastal dune/bluff scrub, marshes and weeps, vernal pools, and coastal scrub habitats. None of these plant communities were found within the project boundaries. No special-status plant species were identified during either the 2009, 2013, or 2014 biological assessment surveys for this site. Special-status plants are not expected to occur within the project site due to the lack of suitable habitats and the highly disturbed nature of the area.

**Sensitive Plant Communities.** A search of the CNDDB records identified one special-status plant community tracked within 5 miles of the project site. This community, Southern Coastal Salt Marsh, is associated with near shore marine tidal influences. During the 2013 and 2014 surveys no sensitive plant communities were present nor were any of the individual indicator species associated with the communities observed.

Within the Conservation Element of the Goleta General Plan, coastal sage scrub, California native oak woodland, and native grassland habitats on the project site are identified as Environmentally Sensitive Habitat Areas (ESHAs). On Figure 4-1 of the Goleta General Plan coastal sage scrub is identified as occurring along the northern-most boundary within the project site. The Goleta General Plan defines Coastal Sage Scrub habitat as a drought-tolerant, Mediterranean habitat characterized by soft-leaved, shallow-rooted subshrubs such as California sagebrush (*Artemisia californica*), coyote brush, California encelia (*Encelia californica*), goldenbush (*Ericameria ericoides*), giant wild rye (*Elymus condensatus*), and annual non-native grasses. Of these species only coyote brush was observed within the project boundaries. The National Vegetation Classification Hierarchy as Applied to California Vegetation identifies coastal sage scrub as a macrogroup of multiple alliances, none of which includes coyote brush as the dominant alliance species.
Previous biological studies (Tierney 2009) included habitat descriptions and a detailed focus study to determine the classification of the on-site scrub community. The determination that the coyote brush habitat found on-site is not considered coastal sage scrub or any other unique, rare or fragile community is confirmed by the 2013 and 2014 surveys. Therefore, although according to Figure 4-1 in the Conservation Element of the Goleta General Plan the project site contains an ESHA with coastal sage scrub, this habitat was not observed within the project boundary or nearby areas.

Although purple needlegrass was observed within the project boundary, there are not enough individual species present to be collectively identified as a foothill grassland habitat. Additionally, although 12 coast live oak trees were observed within the project boundary, associated understory and woodland species were lacking and thus these trees cannot be collectively identified as an oak woodland ESHA. A Mexican elderberry shrub is present; however, although elderberry can be a constituent species within oak woodland, the single mature elderberry on site is located approximately 700 feet to the northwest of the nearest mature coast live oak and therefore does not justify classification of the existing oak trees as an oak woodland or ESHA.

**Special-Status Wildlife.** A search of the CNDDB records identified 11 special-status wildlife species tracked within 5 miles of the project site. Nine of the special-status wildlife species require coastal dune/bluff habitat, open native grasslands, or the presence of perennial flowing or ponded water, none of which are present within the project boundary. The remaining two special-status species include the ferruginous hawk (*Buteo regalis*) and the monarch butterfly. The ferruginous hawk was not observed during the 2009 survey on-site, flying over the site, nor using the site in any other capacity. However, the ferruginous hawk is a wintering species and would not have been expected to be present during late spring and summer surveys. Although eucalyptus trees are found approximately 100 feet north of the project site, plants that would serve as food sources for monarch butterflies are absent from within the project site and there are no historical reports of monarch butterflies using these trees for roosting aggregations. Although not identified in the CNDDB search, a yellow warbler (California Species of Special Concern) was observed within the project boundary during the 2013 survey. While this species was observed, the site lacks suitable nesting habitat (riparian habitat) for the species. No other special-status species were observed during the 2009, 2013, or 2014 surveys, nor are they expected to occur within the project site due to the lack of preferred habitats.

The project site contains habitat that can support nesting birds, including raptors, protected under the California Fish and Game (CDFG) Code Section 3503 and the Migratory Bird Treaty Act (MBTA) (16 U.S.C. §§ 703–712). Native trees, ornamental trees, woody palms, and woody shrubs are present within and adjacent to the project site that could provide suitable nesting habitat. However, no active or previously occupied nests were observed in the vegetation during the 2013 or 2014 surveys.

**Wildlife Movement Corridors.** Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging areas, or they may be regional in nature.

During the 2013 field reconnaissance survey, the potential presence of wildlife movement corridors was assessed. Within the proposed project site there is a low potential for wildlife to move locally through the site due to lack of connectivity with other adjacent undeveloped spaces and the highly urbanized characteristic of the surrounding areas. Therefore, the project site is not located within a corridor that facilitates wildlife movement on a local or regional basis.
**Jurisdictional Drainages and Wetlands.** Per Policy CE 3.1 in the Goleta General Plan: wetlands are any area that meets the definition of a wetland as defined by the California Coastal Commission, CDFW, and the U.S. Fish and Wildlife Service using presence of a single indicator (hydrophytic vegetation, hydric soils, or wetland hydrology) to determine the presence of a wetland. Evaluation for potential jurisdictional drainages and wetlands, for this project, was based on the presence of a single indicator.

**Hydrophytic Vegetation.** The potential presence of hydrophytic vegetation (i.e., wetland plants) was determined by creating a species list for those plants found within the project limits and then assigning an indicator status category to each species to determine whether wetland plants were present within the project area. Based on the plant species identified during the site survey, no hydrophytic vegetation occurs on the project site.

**Hydric Soils.** To establish whether hydric soils were present, a soil pit approximately 12 inches deep was dug to determine the presence or absence of positive field indicators for hydric soils as described in *Field Indicators of Hydric Soils in the United States* (United States Department of Agriculture, Natural Resources Conservation Service 2006) and *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (United States Army Corps of Engineers 2008a). The location of the soil pit is shown in Figure 3 of Appendix C. Soil color was determined using a Munsell® (2000) Soil Color Chart.

Based on a custom soil resource report for Santa Barbara County, California South Coastal Part (Natural Resources Conservation Service 2013), the proposed project site is dominated by soil map unit Goleta Fine Sandy Loam 0 – 2% slope. Other soil units found on site include Xerorthents, cut and fill areas. Goleta Fine Sandy Loam consists of well-drained soils that formed in alluvium derived mainly from sedimentary rock. Goleta Fine Sandy Loam soils are found in valleys and toe of slopes. Xerorthents 0 – 45% slope consist of well-drained soils derived from rock, concrete, asphalt, other debris or earthy fill.

Neither of these soil types is listed on the *National Hydric Soils List by State: California* (United States Department of Agriculture, Natural Resources Conservation Service 2011). Based on soil pit data from the field survey, hydric soils are not present.

**Wetland Hydrology.** The potential presence of wetland hydrology was determined by the presence or absence of primary and secondary indicators, such as surface water and drainage patterns, respectively. Data points were considered to be within a jurisdictional wetland if the area met the criteria for all three factors. One sample point was established at a potentially representative location (the northeast corner of the site) to determine the presence or absence of wetland indicators. Sampling information was entered into the United States Army Corps of Engineers’ Wetland Determination Data Form – Arid West Region.

Based on the drainage and wetland evaluation, there are no drainages or riparian habitat either crossing or adjacent to the project site. The nearest drainage is Glen Annie Creek that passes the project site to the north of U.S. 101, drains east to Los Carneros Road, and empties into the Goleta Slough. Water appears to move across the project site via sheet flow in a northwest to southeast pattern following the prevailing gradient but interspersed with topographic low spots.

**Finding.** Based on the analysis of Rincon’s evaluation for jurisdictional drainages and wetlands, the project site lacks any wetland factor (hydrophytic vegetation, hydric soils, or wetland hydrology).
This finding is in concurrence with previously published studies (Rindlaub 2009, Tierney 2009) indicating the lack of jurisdictional drainages or wetlands.

Protected Trees. The City of Goleta does not have a specific tree protection plan or ordinance. Protection of trees within the City is regulated by Section 4.0 Conservation Element (CE) of the Goleta General Plan and the Draft State of the Goleta Urban Forest Report: An Urban Resource Assessment for the City of Goleta (dated November 17, 2009; herein referred to as the Goleta Urban Forest Report). The objective of Policy CE 9: Protection of Native Woodlands in the Goleta General Plan is to maintain and protect existing native trees and woodlands as a valuable resource needed to support wildlife and provide visual amenities. Protected trees area defined (Policy CE 9.1 in the Goleta General Plan) as oaks (Quercus spp.), walnut (Juglans californica), sycamore (Platanus racemosa), cottonwood (Populus spp.), willows (Salix spp.), or other native trees that are not otherwise protected in Environmentally Sensitive Habitat Areas (ESHAs). Protected trees can include: 1) Heritage Trees, which are defined as an outstanding specimen because of size, form, shape, age, color, rarity, genetic constitution, or other distinctive features; 2) a distinctive community landmark; 3) a specimen associated with a historic person, place, event or period; 4) a representative of a crop grown by ancestors and their successors that is at risk of disappearing from cultivation; or, 5) a specimen recognized by members of a community as deserving heritage recognition.

Currently within the City there are no legal administrative processes for protecting any Heritage Tree or tree of significance on public or private property. The Goleta Urban Forest Report includes references to City ordinances adopted from the County of Santa Barbara at the time of City’s incorporation although none directly pertain to native tree protection or mitigation measures related to native tree removal.

Coast live oak trees (Quercus agrifolia) were observed during the 2013 and 2014 surveys and had been previously documented within the Arborist Report (2009). A review of the Arborist Report (2009) and observations made during the Rincon Consultants 2013 and 2014 surveys found no new protected trees within the project site (Figure 4.3-4). Additionally, all protection measures and mitigation requirements presented in the Arborist Report (2009) met the City’s regulatory requirements. The Arborist Report documented the future status of all trees identified within the project (Table 4.3-1). Trees will be retained, removed, or relocated to an off-site location depending on the location of the tree in relation to the proposed construction and a tree’s ability to survive relocation.

c. Regulatory Setting. The following is a brief summary of the regulatory context under which biological resources are managed at the federal, state, and local levels. A number of federal and state statutes provide a regulatory structure that guides the protection of biological resources.

Federal.

Endangered Species Act of 1973. The Federal Endangered Species Act (ESA) and implementing regulations (Title 16 United States Code (U.S.C.)§§ 1531 et seq., Title 50 Code of Federal Regulations (C.F.R.) §§ 17.1 et seq.) include provisions for the protection and management of federally listed threatened or endangered plants and animals and their designated critical habitats. Section 7 of the ESA requires a permit to take threatened or endangered species during lawful project activities. The administering agency is the USFWS for terrestrial, avian, and most aquatic species.
### Table 4.3-1

**Future Status of Trees Within the Project Boundary**

<table>
<thead>
<tr>
<th>Tree #</th>
<th>Common Name</th>
<th>Scientific Name</th>
<th>DBH (in inches)</th>
<th>Height (in feet)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>24</td>
<td>15</td>
<td>Retain</td>
</tr>
<tr>
<td>2</td>
<td>Deodar cedar</td>
<td><em>Cedrus deodara</em></td>
<td>19</td>
<td>30</td>
<td>Remove</td>
</tr>
<tr>
<td>3</td>
<td>Deodar cedar</td>
<td><em>Cedrus deodara</em></td>
<td>30</td>
<td>40</td>
<td>Remove</td>
</tr>
<tr>
<td>4</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>7</td>
<td>12</td>
<td>Remove</td>
</tr>
<tr>
<td>5</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>6</td>
<td>12</td>
<td>Remove</td>
</tr>
<tr>
<td>6</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>9.5</td>
<td>12</td>
<td>Remove</td>
</tr>
<tr>
<td>7</td>
<td>Deodar cedar</td>
<td><em>Cedrus deodara</em></td>
<td>(26, 21)</td>
<td>50</td>
<td>Retain</td>
</tr>
<tr>
<td>8</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>7.5</td>
<td>10</td>
<td>Remove</td>
</tr>
<tr>
<td>9</td>
<td>Deodar cedar</td>
<td><em>Cedrus deodara</em></td>
<td>34</td>
<td>60</td>
<td>Retain</td>
</tr>
<tr>
<td>10</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>6</td>
<td>10</td>
<td>Retain, Remove</td>
</tr>
<tr>
<td>11</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>12</td>
<td>15</td>
<td>Remove</td>
</tr>
<tr>
<td>12</td>
<td>Italian stone pine</td>
<td><em>Pinus pinea</em></td>
<td>Multi-trunked (12,6,8,10,8,6)</td>
<td>15</td>
<td>Remove</td>
</tr>
<tr>
<td>13</td>
<td>Deodar cedar</td>
<td><em>Cedrus deodara</em></td>
<td>33</td>
<td>60</td>
<td>Remove</td>
</tr>
<tr>
<td>14</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>(12, 7)</td>
<td>15</td>
<td>Retain</td>
</tr>
<tr>
<td>15</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>(18,26,24,24)</td>
<td>65</td>
<td>Retain</td>
</tr>
<tr>
<td>16</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>9</td>
<td>12</td>
<td>Remove</td>
</tr>
<tr>
<td>17</td>
<td>Deodar cedar</td>
<td><em>Cedrus deodara</em></td>
<td>33</td>
<td>60</td>
<td>Remove</td>
</tr>
<tr>
<td>18</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>(14, 5)</td>
<td>20</td>
<td>Remove</td>
</tr>
<tr>
<td>19</td>
<td>Coast live oak</td>
<td><em>Quercus agrifolia</em></td>
<td>8</td>
<td>10</td>
<td>Remove</td>
</tr>
<tr>
<td>A1-2</td>
<td>Canary Island pine</td>
<td><em>Pheonix canariensis</em></td>
<td>2 specimens</td>
<td>Female, 20</td>
<td>Transplant off site</td>
</tr>
<tr>
<td>B1-4</td>
<td>Canary Island pine</td>
<td><em>Pheonix canariensis</em></td>
<td>4 specimens</td>
<td>Male, 20-30</td>
<td>Transplant off site</td>
</tr>
<tr>
<td>C</td>
<td>Canary Island pine</td>
<td><em>Pheonix canariensis</em></td>
<td>1 specimen</td>
<td>Female, 35</td>
<td>Transplant off site</td>
</tr>
<tr>
<td>D1-8</td>
<td>Canary Island pine</td>
<td><em>Pheonix canariensis</em></td>
<td>8 specimens</td>
<td>Male, 20-30</td>
<td>Transplant off site</td>
</tr>
<tr>
<td>E1-5</td>
<td>Canary Island pine</td>
<td><em>Pheonix canariensis</em></td>
<td>5 specimens</td>
<td>Male, 20-30</td>
<td>Transplant off site</td>
</tr>
<tr>
<td>F</td>
<td>Canary Island pine</td>
<td><em>Pheonix canariensis</em></td>
<td>1 specimen</td>
<td>Male, 20</td>
<td>Transplant off site</td>
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<td>G</td>
<td>Mexican fan palm</td>
<td><em>Washingtonia robusta</em></td>
<td>1 specimen</td>
<td>Male</td>
<td>Retain (Street tree)</td>
</tr>
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<td>H</td>
<td>Mexican fan palm</td>
<td><em>Washingtonia robusta</em></td>
<td>1 specimen</td>
<td>Male</td>
<td>Retain (Street tree)</td>
</tr>
</tbody>
</table>

*Fish and Wildlife Coordination Act.* Section 7 of Fish and Wildlife Coordination Act (16 U.S.C., § 742a, *et seq.*, 16 U.S.C., § 1531, *et seq.*, and 50 C.F.R. § 17.1 *et seq.*) require consultation if any project facilities could jeopardize the continued existence of an endangered species. Applicability depends on federal jurisdiction over some aspect of the project (e.g., dredge or fill activities in “waters of the US”). The administering agency is typically the US Army Corps of Engineers (USACE) in coordination with the US Fish and Wildlife Service (USFWS).
Migratory Bird Treaty Act of 1918. The Migratory Bird Treaty Act (16 U.S.C. §§ 703-711) includes provisions for protection of migratory birds, which prohibits the taking of migratory birds under the authority of the USFWS and CDFW.

Clean Water Act of 1977, Section 404. This section of the Clean Water Act (33 U.S.C. §§ 1251 et seq., 33 C.F.R. §§ 320 and 323) gives the USACE authority to regulate discharges of dredge or fill material into waters of the US, including wetlands.

California Endangered Species Act of 1984. The California Endangered Species Act and implementing regulations in the Fish and Game Code, Section 2050 through Section 2098, include provisions for the protection and management of plant and animal species listed as endangered or threatened, or designated as candidates for such listing. The Act includes a consultation requirement “to ensure that any action authorized by a State lead agency is not likely to jeopardize the continued existence of any endangered or threatened species...or result in the destruction or adverse modification of habitat essential to the continued existence of the species” (Fish and Game Code § 2090). Plants of California declared to be endangered, threatened, or rare are listed within the California Code of Regulations (C.C.R.) Title 14 Section 670.2. Animals of California declared to be endangered or threatened are listed at 14 CCR Section 670.5. 14 C.C.R. §§ 15000 et seq. describes the types and extent of information required to evaluate the effects of a project on biological resources of a project site.

California Species Preservation Act 1970: California Fish and Game Code §§ 900 – 903. This law includes provisions for the protection and enhancement of the birds, mammals, fish, amphibians, and reptiles of California, and is administered by the CDFW.

Fish and Game Code. The Fish and Game Code provides specific protection and listing for several types of biological resources, including:

- Fully Protected Species
- Streams, rivers, sloughs, and channels
- Significant Natural Areas
- Designated Ecological Reserves

Fully Protected Species are listed in Section 3511 (fully protected birds), Section 4700 (fully protected mammals), Section 5050 (Fully Protected reptiles and amphibians), and Section 5515 of the Fish and Game Code. The Fish and Game Code of California prohibits the taking of species designated as Fully Protected.

The Fish and Game Code Section 1600 requires a Streambed Alteration Agreement for any activity that may alter the bed and/or bank of a stream, river, or channel. Typical activities that require a Streambed Alteration Agreement include excavation or fill placed within a channel, vegetation clearing, structures for diversion of water, installation of culverts and bridge supports, cofferdams for construction dewatering, and bank reinforcement.

The Fish and Game Code Section 1930 designates Significant Natural Areas. These areas include refuges, natural sloughs, riparian areas, and vernal pools and significant wildlife habitats. An inventory of Significant Natural Areas is maintained by the CDFW Natural Heritage Division and is part of the NDDB.
Section 1580 of the Fish and Game Code lists Designated Ecological Reserves. Designated Ecological Reserves are significant wildlife habitats to be preserved in natural condition for the general public to observe and study.

The Fish and Game Code Sections 2081(b) and (c) allow CDFW to issue an incidenta l take permit for a State listed threatened and endangered species only if specific criteria are met. These criteria can be found in Title 14 C.C.R., § 783.4(a) and (b). No Section 2081(b) permit may authorize the taking of “fully protected” species and “specified birds.” If a project is planned in an area where a fully protected species or specified bird occurs, an applicant must design the project to avoid all takings; the CDFW cannot authorize takings under these circumstances. The Fish and Game Code Section 3503 specifies that it is unlawful to take, possess, or needlessly destroy the nest of any bird, except as otherwise provided by this code. Section 3503.5 specifies it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey), to take, possess, or needlessly destroy the nest of any such bird, except as otherwise provided by this code.

CEQA, Public Resources Code Section 2100 et seq, and CEQA Guidelines, Title 14 California Code of Regulations Section 15000 et seq. The CEQA Guidelines provide a framework for the analysis of impacts to biological resources. The administering agency is the CEQA Lead Agency, which is in this case the City of Goleta.

Native Plant Protection Act of 1977. The Native Plant Protection Act of 1977 and implementing regulations in Section 1900 et seq. of the Fish and Game Code designates rare and endangered plants and provides specific protection measures for identified populations. It is administered by the CDFW.

Public Resources Code Sections 25500 & 25527. These code sections prohibit the siting of development in certain areas of critical concern for biological resources, such as ecological preserves, wildlife refuges, estuaries, and unique or irreplaceable wildlife habitats of scientific or educational value. If there is no alternative, strict criteria are applied under the authority of the CDFW.

Local.

City of Goleta General Plan/Coastal Land Use Plan, 2006, as amended. The Goleta General Plan includes policies that protect and preserve biological resources within the City by designating specific resources and areas as protected, including Environmentally Sensitive Habitat Areas (ESHA), restricting activities and uses in protected areas, providing for the management of the resources on City lands, specifying impact avoidance and mitigation requirements for types of activities and by type of biological resource, and providing guidance for development and conservation decisions over the long-term. The policies anticipate the potential impacts to biological resources from the land uses and activities that will occur under the Goleta General Plan and serve to avoid, reduce, and/or mitigate those impacts. The following key policies regarding biological resources are in the Conservation Element.

CE 3 Protection of Wetlands.

Objective: To preserve, protect, and enhance the functions and values of Goleta’s wetlands.

CE 3.1 Definition of Wetlands. Wetlands are defined as any area that meets the definition of a wetland as defined by the California Coastal Commission, California
Department of Fish and Game, and U.S. Fish and Wildlife Service. The most protective of definitions shall be applied and used to determine the boundary of a wetland. The City of Goleta uses the identification of a single indicator (soil, hydrology, or plants) to determine the boundary of a wetland.

CE 9 Protection of Native Woodlands.

**Objective:** To maintain and protect existing native trees and woodlands as a valuable resource needed to support wildlife and provide visual amenities.

CE 9.1 Definition of Protected Trees. New development shall be sited and designed to preserve the following species of native trees: oaks (Quercus spp.), walnut (Juglans californica), sycamore (Platanus racemosa), cottonwood (Populus spp.), willows (Salix spp.), or other native trees that are not otherwise protected in ESHAs, unless as otherwise allowed in CE 9.

### 4.3.2 Impact Analysis

**a. Methodology and Significance Thresholds.** The analyses in this portion of the EIR are based on the methodology described above under Section 4.1.1, Project Site Setting.

CEQA Guidelines Appendix G. In accordance with Appendix G of the CEQA Guidelines, the project would have a significant impact on biological resources if it would:

a. Have 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 the California Department of Fish and Wildlife or US Fish and Wildlife Service;

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service;

c. Have a substantial adverse effect on federally 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;

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

City of Goleta Environmental Thresholds and Guidelines Manual. The City of Goleta’s *Environmental Thresholds and Guidelines Manual* defines the following thresholds of significance:
Types of Impacts to Biological Resources. Disturbances to habitats or species may be significant, based on substantial evidence in the record, 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.**
c. **Substantially limit reproductive capacity through loss of individuals or habitat.**
d. **Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food resources.**
e. **Substantially limit or fragment range and movement (geographic distribution of animals and/or seed dispersal routes).**
f. **Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends.**

Less Than Significant Impacts. The Environmental Thresholds and Guidelines Manual provides examples of areas in the City of Goleta where impacts to habitat are presumed to be less than significant, including:

- **Small acreages of non-native grassland if wildlife values are low**
- **Individuals or stands of non-native trees if not used by important animal species such as raptors or monarch butterflies**
- **Areas of historical disturbance such as intensive agriculture**
- **Small pockets of habitats already significantly fragmented or isolated, and disturbed or degraded**
- **Areas of primarily ruderal species resulting from pre-existing man-made disturbance**

b. Project Impacts and Mitigation Measures.

**Impact BIO-1** Biological surveys of the project site identified a lack of special-status plant species or suitable habitat for special-status wildlife species. However, the project site contains habitat that could support nesting birds protected under state and federal law. Impacts on sensitive species are Class II, **significant but mitigable.**

As discussed under Project Site Setting, a database search of biological resources and a site survey were conducted to identify potential sensitive species and habitats on the project site. Although a search of the CNDB records identified 11 special-status plant species tracked within five miles of the project site, none were identified during the 2009, 2013, or 2014 biological assessment surveys for this site. Special-status plants are not expected to occur within the project site, due to the lack of suitable habitats and the highly disturbed nature of the area.

The biological assessment surveys identified the ferruginous hawk and monarch butterfly as potentially occurring on the project site, based on their habitat requirements. The hawk species was not observed on or flying over the site, however, while host and food plants for monarch butterflies are absent from within the project site. A yellow warbler (California Species of Special Concern) was observed on the site during the 2013 survey, although the site lacks riparian habitat that could provide nesting areas for the species. No other special-status species were observed during the 2009, 2013, or 2014 surveys, nor are they expected to occur within the project site due to the lack of preferred habitats.
Based on the survey results, special-status plant and wildlife species have a low potential to occur on-site and a low probability of being impacted by the proposed project. Nevertheless, native trees, ornamental trees, and woody shrubs within and adjacent to the project site could provide suitable habitat for nesting birds, including raptors, that are protected under the California Fish and Game (CDFG) Code Section 3503 and the Migratory Bird Treaty Act (MBTA). While no active or previously occupied nests were observed in the vegetation during the 2013 or 2014 surveys, impacts from the removal of woody vegetation on the northern and eastern margins of the site would be potentially significant.

**Mitigation Measures.** The following mitigation measure is required to reduce potential impacts to nesting birds to a less than significant level. Mitigation Measure BIO-1(a) is drawn from the Biological Resources Assessment in Appendix C and replaces Preliminary Mitigation Measure 4 from the Biological Resources section of the *Initial Study*, which also pertained to the protection of nesting birds.

**BIO–1 Nesting Bird Surveys.** If vegetation removal or construction activities are expected to commence during the avian breeding season (typically February to August, but variable based on seasonal climatic conditions) a survey for active nests must be conducted by a qualified avian biologist approved by the City at the site one week before any scheduled tree removal. If active nests are located, all project work must be conducted at a distance (buffer) determined by the City-approved biologist to ensure that active nests are not disturbed and that any young have fledged and become independent of the adults. Project activities may encroach into the buffer at the discretion of the City-approved biologist.

**Plan Requirements and Timing:** Prior to issuance of a grading permit, the permittee must submit the name and qualifications of the project biologist that will conduct such survey work to the City for staff review and approval. The results of the survey must be submitted to the City for staff review and approval before the issuance of any grading or building permits for the project.

**Monitoring:** City Planning and Environmental Review staff must verify compliance before the issuance of any grading/building permits for the project. Further, periodic site inspections by Planning and Environmental Review Staff must take place during grading operations to verify compliance with any restrictions on construction activity posed by either this mitigation measure and/or the biological survey.

**Residual Impact.** In the event of construction during the avian breeding season, Mitigation Measure BIO-1(a) would ensure that any active nests receive adequate protection to protect fledging birds. With the implementation of this measure, impacts would be reduced to a less than significant level.
Impact BIO-2  The Goleta General Plan identifies the presence of coastal sage scrub, an Environmentally Sensitive Habitat (ESHA), on the project site. However, biological assessment surveys for this EIR indicate that no protected habitat ESHAs are present on-site. Impacts on sensitive habitats would be Class III, less than significant.

The primary plant community on the project site, California Annual Semi-Natural Stands, consists of non-native weedy annual grasses and herbs. Pursuant to the Conservation Element of the Goleta General Plan this plant community is not considered to be an ESHA. Coastal sage scrub is identified in the Conservation Element as an ESHA occurring along the northern-most property boundary within the project site. Nevertheless, the 2013 biological assessment survey and 2014 supplemental survey confirm the results of the 2009 survey that the coyote brush habitat in this portion of the site does not constitute coastal sage scrub or any other unique, rare, or fragile community. Coast live oak trees were also observed on the project site, although associated understory and woodland species were lacking and thus these trees cannot be collectively identified as an oak woodland, which is identified as an ESHA in the General Plan. Therefore, coastal sage scrub habitat or other protected habitat ESHAs are not present within the project site boundary, and impacts related to sensitive habitats would be less than significant.

Mitigation Measures. Mitigation is not required as impacts would be less than significant. Although the Initial Study proposes several preliminary mitigation measures to protect coastal sage scrub and native grass habitats, and any ESHAs on-site, surveys of biological resources indicate that no sensitive habitats are present on the project site. Consequently, these preliminary mitigation measures are not warranted for the proposed project.

Residual Impact. Impacts would be less than significant without mitigation.

Impact BIO-3  The project site lacks hydric soils, and wetland hydrology and therefore does not meet any of the City’s criteria for wetland determinations. Impacts on wetlands would be Class III, less than significant.

As detailed in the Jurisdictional Drainage and Wetland Evaluation (Appendix C) and summarized under Project Site Setting, the project site lacks drainages or riparian habitat. Furthermore, the Jurisdictional Drainage and Wetland Evaluation found that hydric vegetation, hydric soils, and wetland hydrology do not occur on the site; the presence of any one of these three characteristics would signify that the site contains wetland habitat, according to the City’s criteria for wetland determinations. Since the site lacks these characteristics, it does not have jurisdictional drainages and wetlands. Therefore, the proposed project would not affect wetlands and impacts would be less than significant.

Mitigation Measures. Mitigation is not required as impacts would be less than significant.

Residual Impact. Impacts would be less than significant without mitigation.

Impact BIO-4  The project site does not serve as a corridor for wildlife movement, due to its poor connectivity with other undeveloped spaces and its location within a highly developed area. Therefore, impacts on wildlife movement would be Class III, less than significant.
A field reconnaissance survey in 2013 assessed the potential presence of wildlife movement corridors on the project site, as discussed under Project Site Setting. This survey found that the site has a low potential for wildlife to move locally through the site, due to the lack of connectivity with other adjacent undeveloped spaces and the highly urbanized character of surrounding areas. Although undeveloped open space is located to the north of the project site, on the opposite side of U.S. 101, the latter serves as a physical barrier to wildlife movement from this area. In addition, the multi-lane Storke Road bounds the site to the west. Existing business park development abuts the site to the east, south, and west. Therefore, the project site is not located within a corridor that facilitates wildlife movement on a local or regional basis, and the project’s impacts on wildlife would be less than significant.

Mitigation Measures. Mitigation is not required as impacts would be less than significant.

Residual Impact. Impacts would be less than significant without mitigation.

Impact BIO-5 Construction of the proposed project would involve removal of coast live oak trees that are protected by the Policy 9.1 in the Conservation Element of the Goleta General Plan. Mitigation of these protected trees would be required. Impacts would be Class II, significant but mitigable.

According to the 2009 Arborist Report, 12 coast live oak trees (Quercus agrifolia) are present on the project site. The 2013 biological resources assessment confirmed the existence of these specimens. Coast live oak trees are protected under the City’s Conservation Element Policy 9.1, as discussed in the Regulatory Setting. If removed, protected oak trees must be compensated at a 10 to 1 ratio by replacement planting, or by protection of naturally occurring oak trees between six inches and six feet tall on the lot. Based on the Preliminary Landscape Plan, as shown in Figure 2-11, three six existing oak trees would be protected and integrated into the site design. In addition, small existing oak saplings (of 5 to 15 gallon size) would be protected along the eastern property line. Nevertheless, the proposed project would remove nine protected oak trees, as indicated on Table 4.3-1 (page 4.3-12). One of the oaks (tree #10) is proposed for removal because it would otherwise eventually impact one of the cedars (tree #9) so removal would better preserve the cedar long term. Nevertheless, impacts would be potentially significant without mitigation in conformance with the Conservation Element Policy 9.1.

Construction of the proposed project also would involve removal of non-native specimen trees such as Canary Island palms (Phoenix canariensis), deodar cedars (Cedrus deodara) and Italian stone pines (Pinus pinea). Although the Arborist Report includes preservation directives for all trees native and non-native during construction activities, City regulatory requirements do not enforce these directives for trees other than oaks (Quercus sp.). Therefore, impacts from the removal of non-native trees on the project site would be less than significant.

Mitigation Measures. Mitigation is required to protect coast live oak trees on the project site. Mitigation Measure BIO-5(a) is derived from the Biological Resources Assessment (Rincon Consultants, 2013) and updates the first Preliminary Mitigation Measure in the Biological Resources section of the Initial Study.

BIO-5 Tree Protection. Construction impacts to the coast live oaks which are to be preserved should must be minimized. A tree protection zone (dripline plus five feet) should be established before any ground disturbance by the
installation of exclusionary fencing. If any areas of the protection zone would be intruded upon by excavation activity, areas within the protection zone must be hand dug and overseen by a qualified arborist. Mitigation for removed trees must be implemented with like species trees at a ratio of 10:1 if using one gallon container size trees or 3:1 if using 24-inch box trees (Goleta Municipal Code Title 15, Chapter 15.09 Appendix A Grading Ordinance Guidelines for Native Oak Tree Removal). A long-term maintenance program of no less than five years of monitoring must be implemented to insure mitigation success.

Any unanticipated damage to trees or sensitive habitats identified for protection/preservation on the approved Land Use Permit plans from construction activities must be mitigated in a manner approved by the City. This mitigation must include, without limitation, posting of a performance security, tree replacement on a 10:1 ratio, and hiring of an outside consulting biologist or arborist approved by the City to assess damage and recommend mitigation. The required mitigation must be done under the direction of the City-approved biologist or arborist before any further work occurring on site. Any performance securities required for installation and maintenance of replacement trees will be released by City staff after its inspection and approval of such installation and maintenance.

To help ensure the long-term survival of on-site oaks, no permanent irrigation systems are permitted within six (6) feet of the dripline of any oaks. Any landscaping must be of compatible species requiring minimal irrigation. Drainage plans must be designed so that tree trunk areas are properly drained to avoid ponding.

**Plan Requirements and Timing:** This condition must be printed on project plans submitted for Land Use Permit grading and building plan approval. Fencing must be graphically depicted on all project plans submitted for approval of any Land Use Permit for the project or issuance of any building or grading permit.

**Monitoring:** City Planning and Environmental Review staff must review plans and confirm fence installation before grading/building permit issuance. City Planning and Environmental Review staff must conduct site inspections to ensure compliance during all grading and construction activities.

**Residual Impact.** With protection of existing coast live oak trees and mitigation of removed trees in accordance with the Goleta Municipal Code, Chapter 15.09, impacts on protected trees would be reduced to a less than significant level.

**Impact BIO-6** Landscaping on the project site could facilitate the spread of invasive plant species in existing natural habitats in surrounding areas. Impacts would be Class II, significant but mitigable.
Invasive plant species are non-native organisms that escape into surrounding ecosystems, where they become established and proliferate. Many invasive species form monocultures (dense stands of one plant) that push out native species and impair wildlife habitat (Cal-IPC, Invasive Plant Definitions, 2013). Some invasive species also can change fundamental processes in ecosystems including the hydrologic cycle, fire regimes, and soil chemistry.

The proposed project could facilitate the spread of invasive species depending on the plant palette in its landscaping plan. According to the project’s Preliminary Landscape Plan, the suggested plant palette includes several species listed as invasive by the California Invasive Plant Council (Cal-IPC):

- *Olea europaea* (olive)
- *Washingtonia robusta* (Mexican fan palm)
- *Cordyline* species (grass palm)
- *Hedera helix* (English ivy)
- *Zantedeschia aethiopica* (calla lily)

Not all of these plants, based on their breeding or location in southern California, would be invasive in the Goleta area. The cultivars of *Olea europaea* that are listed in the Preliminary Landscape Plan (‘Swan Hill’ and ‘Little Ollie’) are fruitless and would not produce seeds that could disperse into natural areas (Malone, 2013). Furthermore, although proposed landscaping on the project site could include the invasive species *Cordyline australis* (New Zealand cabbage tree), Cal-IPC describes its distribution in California as “limited to two infestations in coniferous forests” in northern California and finds that it is not aggressively invasive (Cal-IPC, Invasive Plant Inventory, 2013). Therefore, this species would not be at risk of invading natural areas in Goleta.

Nevertheless, the Preliminary Landscape Plan includes other species known to be invasive in southern California. In particular, *Washingtonia robusta* (Mexican fan palm) is known to create monospecific stands in riparian areas, and *Zantedeschia aethiopica* (calla lily) can invade coastal prairies and wetlands (Cal-IPC, Invasive Plant Inventory, 2013). The project also could include *Cistus* species (rockrose). Cal-IPC added *Cistus ladanifer* (gum rockrose) to its Watchlist in December 2010, based on reports that it has started to become invasive in natural areas in California (Cal-IPC, Watchlist, 2013).

Based on the Preliminary Landscape Plan, the proposed project could facilitate the spread of invasive species in natural areas. To protect native biodiversity in Goleta and surrounding natural areas, the final landscape plan would be required to eliminate any species that may become invasive. Impacts related to invasive species would be significant but mitigable.

**Mitigation Measures.** Mitigation is required to prevent the spread of invasive species on the project site. Mitigation Measure BIO-6 is additional to the aesthetic landscaping requirements listed in Mitigation Measure AES-3(e).

**BIO-6 Landscaping.** Invasive plant species must not be used for project landscaping. Excluded species must include those listed as problematic and/or invasive by CNPS, Cal-IPC, or which are listed as ‘noxious weeds’ by the State of California or the U.S. Federal Government and/or otherwise determined to be problematic and/or invasive by the City of Goleta. Boston ivy (*Parthenocissus tricuspidata*), Japanese honeysuckle (*Lonicera japonica*),
and rockrose (Cistis ladanifer) must be among those species excluded from use in landscaping.

**Plan Requirements and Timing:** The final landscape plan must identify all existing and new trees, shrubs, and groundcovers by species. No species included in the final landscape plan may be listed as problematic and/or invasive by the California Native Plant Society or the California Invasive Plant Council, or listed as a 'noxious weed' by the State, Federal, or City government.

**Monitoring:** The final landscape plan must be reviewed and approved by the DRB and submitted to Planning and Environmental Review Director for final review and approval before the City issues a grading permit. All landscaping in or near an open space area must be subject to Santa Barbara County Fire Department Protection District approval before the City issues a building permit for construction. The approved plant palette must be adhered to throughout the life of the project.

**Residual Impact.** By avoiding the planting of invasive species through the life of the project, biological impacts from invasive species would be reduced to a less than significant level.

c. **Cumulative Impacts.** Cumulative development in the central Hollister area of Goleta consists of infill of remaining undeveloped parcels (e.g., the Westar and Willow Springs II projects) within an urbanized area. Previous development in this area has permanently eliminated extensive tracts of native plant communities, some of them now classified as rare or threatened. Native habitats support native wildlife species, many of which cannot survive in, or do not adapt to, the noise and disturbance associated with residential and urban developments. Species that do tolerate developed, landscaped, and disturbed sites include aggressive, non-native species that further displace native plants and wildlife, or may prey upon native species.

As discussed in the *Project Site Setting*, vegetation on the majority of the project site consists of non-native grasses and herbs. The proposed change in land use from existing conditions to residential development would not be cumulatively considerable, as the reduction and fragmentation of native habitats (including sensitive habitats), loss of native plant species diversity and populations, and reduction in native wildlife diversity and populations has already occurred in the past. Moreover, mitigation measures would protect existing biological resources on the project site, such as nesting birds and coast live oak trees. Therefore, the project’s contribution to cumulative impacts is not considerable, and the proposed change in land use would not have a cumulatively significant effect.