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**On behalf of the City of Goleta**

George Thomson  
City of Goleta  
130 Cremona Drive, Suite B  
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Via email:  
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March 28, 2024  
Project No: 22-13734

Submitted to: Jacqueline Phelps  
California Coastal Commission  
South Central Coast District  
89 South California Street  
Ventura, California 93001  
Via email: [Jacqueline.Phelps@coastal.ca.gov](mailto:Jacqueline.Phelps@coastal.ca.gov)

**Subject: Final Implementation Plan and Public Access Plan for the Ellwood Mesa Open Space  
Neighborhoods Hazardous Fuel Reduction Project  
Goleta, CA 93117**

Dear Ms. Phelps:

On behalf of the City of Goleta (City), Rincon Consultants, Inc. (Rincon) has prepared this Final Implementation Plan and Public Access Plan for the Ellwood Mesa Open Space Neighborhoods Hazardous Fuel Reduction Project (project) located in Goleta, California. The purpose of the Final Implementation Plan is to summarize actions that the City will take during implementation of the project, consistent with the Special Conditions from the California Coastal Commission (CCC) Notice of Intent (NOI) to issue the Coastal Development Permit (CDP) No. 4-23-0215, dated December 14, 2023. The purpose of the Public Access Plan is to describe the methods by which safe public access will be maintained around approved work and staging areas during all project operations.

The Final Implementation Plan and Public Access Plan have been prepared pursuant to Special Conditions 2 and 3, which state:

- 2. Final Implementation Plan.** *PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and written approval of the Executive Director, a Final Implementation Plan for the proposed project. In addition to the information contained within the Community Wildfire Protection Plan Fuel Reduction/Treatment Types Zones Matrix and Figures 2a – 2d (Exhibits 4 and 5), the final plan shall contain the following:*

*A. Updated Figures*

- a. Figures 2a – 2d (Exhibit 5) shall be modified to update all treatment areas to reflect the designation contained within the Community Wildfire Protection Plan Fuel Reduction/Treatment Types Zones Matrix (Exhibit 4).*
- b. Figures 2a – 2d (Exhibit 5) shall be modified to reduce the size of the vegetation management polygons to only depict vegetation management*



*activities within 100 feet of aggregation sites and within 100 feet of existing development.*

- B. Species Monitoring and Avoidance. Species protection measures shall be implemented pursuant to the Nesting Bird Management Plan and Wildlife Species Protection Plan prepared by Storrer Environmental Services, LC, dated October 4 2023 and October 5, 2023, and both plans shall be incorporated into the Final Implementation Plan.*
- C. Monitoring. The applicant shall submit, for the review and approval of the Executive Director, on an annual basis, a written monitoring report prepared by a resource specialist, indicating the process of the vegetation management activities on the site. This report shall include information on the types of species 4-23-0215 (City of Goleta) 7 encountered during surveys, avoidance measures implemented, as well as photographs taken before and after vegetation management activities from predesignated sites. Each report shall be cumulative and shall summarize all previous results. At the end of the five-year permit term, a final detailed report on the vegetation management activities shall be submitted.*

*The Applicant shall undertake development in accordance with the final approved plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Coastal Commission approved amendment to this coastal development permit or a new coastal development permit unless the Executive Director determines that no new amendment or permit is legally required.*

- 3. Public Access Plan.** *PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and approval of the Executive Director, a public access plan that describes the methods (including signs, fencing, etc.) by which safe public access around approved work and staging areas shall be maintained during all project operations, adequate fencing and signage shall be used and the applicant shall post the site with a notice indicating the expected dates of construction and/or temporary closures. The applicant shall maintain public access pursuant to the approved final plan. Any proposed changes to the approved plan shall be reported to the Executive Director. No change to the plan shall occur without a Commission-approved amendment to the permit unless the Executive Director determines that no such amendment is required.*

The project involves immediate removal of dead and downed eucalyptus trees (hazardous fuel reduction activities) as described in the City's Community Wildfire Protection Plan (CWPP) at Ellwood Mesa. The project will be implemented based on the project description and other pertinent information provided in the Waiver de Minimis (waiver) package for the project, which was submitted to the CCC in March 2023 (Attachment 2).

## Final Implementation Plan

### Updated Figures

In addition to fuel management prescriptions provided in the CWPP Prescription Guidance for Vegetation Management Units, the City and its team of consulting biologists have further refined fuel reduction activities within individual treatment zones (Figures 1a through 1e). Figures 1a through 1e reflect the designation contained within the CWPP Fuel Reduction/Treatment Zones Matrix (Table 1). The figures and matrix have been updated pursuant to CDP Special Condition 2A.a, from the original corresponding Figures 2a through 2d and Attachment 6 of the waiver package.



Treatment zones have been adjusted to limit the proposed vegetation management activities to areas within 100 feet of aggregation sites or within 100 feet of existing development (habitable structures) per Special Condition 2A.b. Aggregation sites were determined based on the forested eucalyptus grove canopy within Ellwood Open Space and consistent with the western monarch overwintering site boundaries in the Xerces Society Map of Overwintering Sites and the monarch butterfly and/or raptor roosting habitat environmentally sensitive habitat areas (ESHAs) mapped by the City's General Plan/Coastal Land Use Plan Conservation Element Figure 4-1.

### **Species Monitoring and Avoidance**

Pursuant to CDP Special Condition 2B, species protection measures will be implemented pursuant to the Nesting Bird Management Plan (NBMP; Attachment 2) and Wildlife Species Protection Plan (WSPP; Attachment 3) prepared by Storrer Environmental Services, LLC dated October 4, 2023 and October 5, 2023. Both reports are hereby incorporated into this FIP.

In addition to the measures listed in the NBMP and WSPP, the project will also adhere to the best management practices (BMPs) indicated in CDP Special Condition 4 as follows:

- A. Prior to the commencement of any project activities, the limits of the work areas and staging areas shall be delineated in cooperation with a qualified biologist, limiting the potential area affected by project activities. All vehicles and equipment shall be restricted to pre-established work areas and haul routes and to established or designated staging areas.
- B. During project Activities, all trash and debris shall be properly contained, removed from the worksite, and disposed of on a daily basis, and no tools or other materials shall be stored at the work site overnight. No materials, debris, or waste shall be placed or stored where it may enter sensitive habitat, receiving waters or a storm drain, or be subject to wind, rain, or erosion and dispersion. Any debris inadvertently discharged into coastal waters shall be recovered immediately and disposed of consistent with the requirements of this coastal development permit.
- C. Temporarily stockpiles of excavated sediment/vegetation should be protected with geofabric or other appropriate cover. Permanent stockpiling of excavated material on 4-23-0215 (City of Goleta) 8 site shall not be allowed. Vegetation and sediment shall be removed from the site on a regular basis during enhancement activities to prevent the accumulation of sediment and debris on the worksite.
- D. Any fueling and maintenance of construction equipment shall occur within upland areas outside of environmentally sensitive habitat areas or within designated staging areas. Mechanized heavy equipment and other vehicles used during the project activities shall not be refueled or washed within 100 feet of coastal waters. Thinners or solvents shall not be discharged into sanitary or storm sewer systems.
- E. The discharge of any hazardous materials into any receiving waters shall be prohibited.
- F. Best Management Practices (BMPs) and Good Housekeeping Practices (GHPs) designated to prevent spillage and/or runoff of sediment, non-native invasive vegetation or weeds, trash or contaminants associated with project activity, shall be implemented prior to the on-set of such activity.
- G. All BMPs shall be maintained in a functional condition throughout the duration of enhancement activities.

Project tools, materials, and equipment will be stored at designated staging areas as shown in Figure 2 and will not be stored at work sites overnight, pursuant to Special Condition 4B



## Monitoring

Pursuant to CDP Special Condition 2C, the City will submit an annual written monitoring report throughout the 5-year permit term, as well a final monitoring report on vegetation management activities.

## Public Access Plan (PAP)

During project activities, trails will be closed within at least 100 feet of work for public safety. Work areas are anticipated to change daily or weekly based on a strategic treatment zone approach, crew availability, and sensitive biological resource restrictions/avoidance. Trails will be open every day, after activities conclude. During daily activities, signs will be posted to reroute the public to the open trails. The City will post the weekly schedule on their website dedicated to this effort. Signs will be posted at all 13 entrances to the open space with the following information: Need for Project, City Contact, Background, Applicable Permits, and a For More Information link. Alternative routes and construction staging areas will not disrupt native habitats and will utilize the existing trail network, as shown in Figure 2. Signs, site demarcation materials, and equipment will be removed daily. No overnight trail closures will occur.

Sincerely,

Yuling Huo  
Senior Biologist / Project Manager

Christopher Julian  
Principal Biologist / Regulatory Specialist

## Attachments

- Figure 1a CWPP Fuel Reduction/Treatment Zones - Overview
- Figure 1b CWPP Fuel Reduction/Treatment Zones
- Figure 1c CWPP Fuel Reduction/Treatment Zones
- Figure 1d CWPP Fuel Reduction/Treatment Zones
- Figure 1e CWPP Fuel Reduction/Treatment Zones
- Figure 2 Public Access
- Table 1 CWPP Fuel Reduction/Treatment Zones Matrix
- Attachment 1 Waiver Package
- Attachment 2 Nesting Bird Management Plan
- Attachment 3 Wildlife Species Protection Plan

## References

Xerces Society. 2023. Map of Overwintering Sites. Available online at:  
<https://westernmonarchcount.org/map-of-overwintering-sites/>. Accessed December 2023.