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July 10, 2017

Ms. Shawna Schaffner
CAA Planning, Inc.
65 Enterprise, Suite 130
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Subject: Biological Resources Assessment for the Bacara Beach House Relocation Project, Goleta, Santa Barbara County, California

Dear Ms. Shaffner:

Kevin Merk Associates, LLC (KMA) at your request, prepared this biological resources assessment to characterize existing conditions within the study area and identify potential impacts associated with the proposed Bacara Beach House Relocation Project. The project is located on a portion of the Bacara Resort & Spa property (APN 079-200-006 and -009) in the City of Goleta, Santa Barbara County, California. The approximately 6.6-acre study area developed for the project is situated to the east of the Bacara Resort, south of Tennis Facility on Hollister Avenue, and covers the existing Beach House site, proposed relocation site, and surrounding area. The study area also extends to the east along the coastline to include the eroded bluff undermining an existing trail. Please refer to the attached Figures 1 and 2 for site location and aerial overview maps.

Project Summary

Haskell's Beach House at Bacara Resort is proposed to be relocated in response to significant erosion caused by wave run up undercutting the slope on which the beach house sits. During the 2015 winter storm season, the structural integrity of the Beach House was severely compromised by ocean run up generated by multiple large winter storms. Immediate action was taken to close the Beach House and secure the area using caution tape, temporary fencing and signage. In addition, the property owner, in conjunction with the City of Goleta and Coastal Commission, took measures to reinforce the slope area under the Beach House with approximately 850 linear feet of yard block, sand bags, and polyethylene plastic sheeting. The yard block was installed as a temporary measure to prevent the Beach House from falling into the ocean while a plan for either permanent protection or relocation could be developed by the property owner, City and Coastal Commission. The final resolution is that the Beach House and its amenities, including showers, restrooms, and a snack bar, will be demolished and reconstructed in an inland location away from potential ocean surge and wave run up. The relocated Beach House would be generally the same size and overall footprint and provide substantially the same function as the existing Beach House.

The following details the methods and results of the investigation.

METHODS

KMA conducted a review of available background information including historic aerial photographs

and previous biological studies conducted in the region. As part of the background review, the California Natural Diversity Database (CNDDB, March and June 2017) maintained by the California Department of Fish and Wildlife (CDFW) was reviewed for documented special status resources within a five-mile radius of the study area. This search distance was sufficient to identify those special status species and plant communities with potential to occur in the immediate vicinity of the study area. The database was used to evaluate nearby documented occurrences of special-status plant and wildlife and compare the recorded habitat attributes with those present onsite to make a determination if a particular species was expected to occur onsite.

The Natural Resources Conservation Service (NRCS) Web Soil Survey was reviewed to determine the soil mapping units present within the study area (U.S. Department of Agriculture 2017). The U. S. Fish and Wildlife Service's online National Wetland Inventory and Critical Habitat Mappers (http://www.fws.gov/wetlands/Data/Mapper.html; http://criticalhabitat.fws.gov/crithab/) were also reviewed to evaluate the extent of documented wetlands and designated critical habitat defined in the region.

For the purpose of this report, special status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the U.S. Fish and Wildlife Service (USFWS) under the federal Endangered Species Act (ESA); those listed or proposed for listing as Rare, Threatened, or Endangered by the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act (CESA); animals designated as "Species of Special Concern," "Fully Protected," or "Watch List" by the CDFW; and plants occurring on California Rare Plant Rank lists 1, 2, 3 and 4 developed by the CDFW working in concert with the California Native Plant Society. The specific code definitions are as follows:

- *1A = Plants presumed extinct in California;*
- *1B.1 = Rare or endangered in California and elsewhere; seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat);*
- *1B.2 = Rare or endangered in California and elsewhere; fairly endangered in California (20-80% occurrences threatened);*
- *1B.3 = Rare or endangered in California and elsewhere, not very endangered in California (<20% of occurrences threatened or no current threats known);*
- *2 = Rare, threatened or endangered in California, but more common elsewhere;*
- *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); and*
- *4.2 = Plants of limited distribution (watch list), fairly endangered in California (20-80% occurrences threatened).*
- *4.3= Plants of limited distribution (watch list), not very endangered in California.*

In addition, sensitive or special status natural communities are those habitat types listed in the CNDDB or identified as S1, S2 or S3 in the Manual of California Vegetation (Sawyer et al., 2009).

KMA Principal Biologist, Kevin Merk, conducted field work on the study area on March 30, May 10, and May 26, 2017. Weather during the surveys was generally clear with varying levels of marine low clouds that burned off by midday. Temperatures ranged from approximately 60-70 degrees

Fahrenheit. The entire study area was walked using existing trails and open areas within the native coastal scrub to identify plants, observe wildlife (including their sign), and characterize the vegetation types present. Existing plant communities were mapped on an aerial photograph obtained from Google Earth. Vegetation classification generally followed Holland's *Preliminary Descriptions of the Terrestrial Natural Communities of California* (1986) and was cross-referenced with *A Manual of California Vegetation, Second Edition* (Sawyer et al., 2009) for consistency. Plant taxonomy followed the *Jepson Manual, Second Edition* (Baldwin et al., 2012).

Since the field work occurred in the spring of 2017, focused surveys for special status plants to determine their presence or absence from the site were conducted and the results are included herein. The evaluation of special status animal species presence or absence and identification of habitat that could support these species was based on our field observations, knowledge of the particular species biology, and review of documented records included in the CNDDB. Definitive surveys for the presence or absence of the wildlife species identified in the region during the background review were not conducted. Wildlife species generally require specific survey protocols with extensive field survey time to be conducted only at certain times of the year.

RESULTS

The study area is located along the Pacific Ocean south of Hollister Avenue and Highway 101 in an area bounded by the existing Beach House to the south and the Tennis Facility to the north. The Tecolote Creek corridor and a large hill generally form the western and eastern site boundaries (please refer to Figures 1 and 2 for site location information). Elevation on the study area ranges from approximately 11 feet at the existing Beach House to approximately 31 feet in the northern limits of the study area near the Tennis Facility. The investigation included sufficient area to characterize biological resources present along the beach and bluff area where the Beach House would be demolished and extended inland to the Tennis Facility. The hillside to the east was also included to assess biological resources present in this location to determine if the proposed relocation activities could indirectly affect special status biological resources that may be present in the area.

The spring 2017 surveys identified two native habitats (coastal sage scrub and sandy beach) within the study area along with developed/landscaped areas and planted non-native trees. Focused spring surveys did not identify any special status plants within the study area, and the habitat suitability analysis did not identify any special status animals that could potentially occur within the proposed disturbance footprint.

A series of maps are provided as attachments to this report. Figure 1 is a site location map, and Figure 2 is an aerial overview map to show the site in its geographic context. Figure 3, the habitat map, documents observed habitat conditions within the study area, and Figure 4 illustrates the soil mapping units as defined by the USDA. Figures 5 and 6, the CNDDB occurrence maps, identify the recorded or known occurrences of special status biological resources and federal critical habitat from the project vicinity. Figure 7 is an aerial photograph overlaid with the City of Goleta's Environmentally Sensitive Habitat Areas (ESHA) information. Finally, photos of notable features were taken, and a photo plate is also included as an attachment to this report.

Below provides further detail of the biological resources observed within the study area, and includes an analysis of the potential for special status resources to occur onsite. Impact statements for biological resources that may be affected by the project are also included. For potentially significant impacts, mitigation measures to reduce project related impacts to a less than significant level pursuant to the California Environmental Quality Act (CEQA) are also provided.

Habitat Types

Natural habitat types within the Beach House Relocation Project study area consisted of Venturan Coastal Sage Scrub, and Sandy Beach (with some patchy cobble occurrences). Non-native habitats and features included the Developed/Landscaped (including ruderal/disturbed areas, lawn and palm tree plantings), Monterey cypress grove, and constructed trails and roadways. To the west of the study area is Tecolote Creek and its associated riparian corridor and wetland/estuary system at the creek mouth and ocean interface. Please refer to attached Figure 2, the aerial overview map, and Figure 3, the habitat map, for further detail.

Coastal Sage Scrub

The coastal sage scrub habitat observed onsite consisted primarily of woody shrubs planted as part of a restoration project implemented during the construction of the Bacara Resort. This habitat type is generally consistent with the Venturan Coastal Sage Scrub habitat described by Holland (1986) and the more recently described California Sagebrush Scrub described by Sawyer et al. (2009). Within the study area, it was dominated by a mix of shrubs including California sagebrush (*Artemisia californica*), bush sunflower (*Encelia californica*), and black sage (*Salvia mellifera*). Patches of giant wild rye (*Elymus condensatus*) were also present.

Since this habitat area was part of a restoration project, it intergrades with landscaping (with both native and non-native plants) of the resort facility. Regular maintenance of trails includes trimming, weed removal, and watering vegetation. In addition, irrigation tubing was still present onsite. Although it appears that the irrigation system had been turned off, moisture tolerant shrubs such as mulefat (*Baccharis salicifolia*) were present mixed in with the drier coastal sage scrub species. Non-native weeds were also observed in this habitat type and included invasive species such as Cape ivy (*Delairea odorata*) and sticky eupatorium (*Ageratina adenophora*), both of which are adapted to moist conditions created by landscape irrigation. A small constructed swale feature was also present just north of the Beach House to help direct surface runoff to the west towards Tecolote Creek. While it was a minor topographic swale primarily composed of the coastal sage scrub species listed above, several clumps of common rush (*Juncus patens*) and rabbits foot grass (*Polypogon monspeliensis*) were observed in the area indicating the presence of increased seasonal moisture.

Coastal scrub communities provide cover and nesting habitat for a variety of animals such as western fence lizard (*Sceloporus occidentalis*), blue-gray gnatcatcher (*Polioptila caerulea*), wrentit (*Chamae fasciata*), California towhee (*Melazone crissalis*), and California mouse (*Peromyscus californicus*). Since this habitat type was restored in a degraded portion of the site during project construction activities, it is not yet expected to have the species richness compared to intact native stands of coastal scrub habitat present in the general region. In addition, the existing development

and regular human presence on the site is expected to adversely affect the distribution and diversity of wildlife in the general area.

Beach

The thin strip of sandy beach habitat below the existing Beach House is classified as marine, intertidal, unconsolidated shore, consisting of regularly flooded sand (Cowardin et al. 1979). This habitat is characterized by sandy substrate lacking vegetation except for occasional pioneering plants such as sea rocket (*Cakile maritima*). Common shorebirds including long-billed curlew (*Numenius americanus*), sanderling (*Calidris alba*), and willet (*Catoptrophorus semipalmatus*) frequently forage on sandy beach habitats. Sandy beaches provide habitat for a variety of macro-invertebrates that are an important food source for shorebirds, including sand crabs (*Emerita analoga*), isopods (*Excirolana chiltoni* and *Tylos punctata*), and several species of polychaete worms (*Euzonus mucronata*, *Excirolana chiltoni*, and *Hemipodus borealis*). Given the narrow strip of sandy beach within the study area, it is unlikely that the western snowy plover could use the site for breeding.

Monterey Cypress Plantings (including Eucalyptus trees)

Both Monterey cypress and various species of Eucalyptus trees have been planted throughout the Bacara Resort area. Within the eastern study area on the hill above the coastal plain, a dense grove of Monterey cypress (*Hesperocyparis macrocarpa*) is present. Several young plantings were also noted along the east side of the existing paved access road. While blue gum eucalyptus (*Eucalyptus globulus*) is also present on the hillside to the east and north of the study area, only one tree extended into the study area along a trail leading up the hill.

The eucalyptus occurrences to the east of the study area along Hollister Avenue and the railroad tracks historically supported a Monarch butterfly (*Danaus plexippus*) overwintering site. However, the structure of the historic site appears to have been impacted by road construction, railroad maintenance and trees falling over. As a result, Monarch butterflies have not been observed using the site in recent years (CNDDB, 2017). Large trees in the area including both Monterey cypress and blue gum Eucalyptus, could support foraging activities by the Monarch butterfly, but appear to lack sufficient structure as an overwintering site. They are expected to provide habitat for a suite of native and non-native birds, and could also support nesting raptors. No nest sites or bird nesting behavior was noted in the Monterey cypress grove or nearby Eucalyptus trees within the study area during the site visits conducted in March and May 2017.

Developed/Landscaped

Developed/Landscaped areas identified on Figure 3 are not native plant communities, and as such, are not described by vegetation classification systems used in this analysis since they are anthropogenic influenced land types. The developed/landscaped land type also is generally consistent with ruderal or disturbed land type, which typically occurs on heavily used and/or frequently disturbed sites. It includes weedy non-native species that are especially successful as colonizers of road edges and where the regular cycle of disturbance from weed eating and maintenance activities occur. The Beach House and surrounding areas, including along the trails and paved access road leading to the beach supported ruderal vegetation as the result of continual

disturbance by resort staff, vehicles and beachgoers. Typical ruderal species are primarily non-natives, such as various bromes (*Bromus* spp.), bur clover (*Medicago polymorpha*), and the native telegraph weed (*Heterotheca grandiflora*).

Although developed/landscaped areas are typically of marginal value to wildlife, its proximity to natural plant communities allow common and opportunistic species such as the western fence lizard and California ground squirrel (*Spermophilus beecheyi*) to utilize these areas for basking in the sun and foraging.

Soils

The USDA Natural Resources Conservation Service (NRCS; Soil Conservation Service) identified Goleta loam, 0-2% slopes as the primary soil map unit present within the study area. Other soil map units identified onsite included: Milpitas-Positas fine sandy loams, 2-9% slopes; Milpitas-Positas find sandy loams, 30-50% slopes, eroded; and Gullied Land. Generally speaking, these soils have formed on old terraces along the coastal plain in the region. They are typically well drained, and occupy low, rolling or gently undulating terraces that are dissected by small creeks. They are also subject to erosion, which is the case with the Gullied Land type mapped in the area.

Natural Drainage Features and Hydrology

No natural drainage features were present within the study area. As stated above, A small constructed drainage swale was observed onsite just to the north of the existing Beach House, and would also not likely be impacted during Beach House relocation activities. Tecolote Creek is located further west of the Beach House study area and would not be affected by the proposed project.

Special Status Biological Resources

The Goleta coastal region is known to provide habitat for numerous special status, or rare, plant communities, and species of plants and animals. Figures 5 and 6 identify the documented occurrences of these resources within a five-mile search radius of the study. Table 1 included as an attachment, contains a table of the CNDDB occurrence data and listing status for all special status species and habitats documented within the five mile search area. Also included in the table is analysis as to whether or not these species or habitats are expected to occur in the study area and be affected by the proposed project. Based on this investigation, no special status plant communities, plants or wildlife are expected to occur in the proposed disturbance footprint and be affected by the proposed Beach House Relocation Project.

Special Status Natural Communities

The CNDDB search identified the occurrence of one (1) special status plant community, Southern Coastal Salt Marsh, within the five mile search area. Our knowledge of the area identified other special status plant communities known to occur in the area, which included Coastal Bluff Scrub, Riparian Scrub/Woodland, and Wetland. While riparian scrub and wetland habitats were observed along Tecolote Creek to the west, no special status plant communities were observed onsite.

Special Status Plants

The CNDDB search identified ten (10) special status plants from the general site vicinity. Species that are known to occur in coastal sage scrub habitat such as Davidson's saltscale (*Atriplex serenana* var. *davidsonii*), mesa horkelia (*Horkelia cuneata* var. *puberula*) and black flowered figwort (*Scrophularia atrata*), were searched for during spring surveys to determine if they were present onsite. Please refer to the attached Table 1 - Special Status Biological Resources Occurrence Information for further detail. The ten species identified in the CNDDB as occurring within five miles of the site include:

- Black flowered figwort;
- Contra Costa goldfields (*Lasthenia conjugens*);
- Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*);
- Coulter's saltbush (*Atriplex coulteri*);
- Davidson's saltscale;
- Estuary seablite (*Suaeda esteroa*);
- Mesa horkelia;
- Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*);
- Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*); and
- Southern tarplant (*Centromadia parryi* ssp. *australis*).

While these species have been observed in the region, they are not expected to occur onsite based on the results of the spring 2017 surveys or the lack of suitable habitat.

Special Status Animals

The CNDDB contains records of 15 special status animal species within five miles of the site. Based on the habitat suitability analysis, these special status animals are not expected to occur on the study area due to a lack of suitable habitat. Special status wildlife identified in the CNDDB as occurring within five miles of the site, included:

- Belding's savannah sparrow (*Passerculus sandwichensis beldingi*);
- California red-legged frog (*Rana* draytonii);
- Crotch bumble bee (*Bombus crotchii*);
- Ferruginous hawk (*Buteo regalis*);
- Globose dune beetle (*Coelus globosus*);
- Light-footed clapper rail (*Rallus longirostris levipes*);
- Mimic Tryonia (=California brackishwater snail) (*Tryonia imitator*);
- Monarch butterfly;
- Sandy beach tiger beetle (*Cicindela hirticollis gravida*);
- Tidewater goby (*Eucyclogobius newberryi*);
- Townsend's western big-eared bat (*Corynorhinus townsendii*);
- Tri-colored blackbird (*Agelaius tricolor*);
- Western pond turtle (*Emys marmorata*);
- Western snowy plover (*Charadrius alexandrinus nivosus*); and
- White-tailed kite.

The California red-legged frog, mimic Tryonia, tidewater goby, and western pond turtle, for instance, are aquatic species known to occur in the general region. The site does not include any natural drainage features with aquatic habitat, and therefore, these aquatic species are not expected to occur onsite. While they could potentially occur in nearby drainage features such as Tecolote Creek to the west or Bell Canyon Creek to the east, project activities would not result in direct or indirect impacts to these species.

Other special status species identified in the CNDDB are primarily associated with coastal dunes (i.e., globose dune and sandy beach tiger beetles) and salt marsh habitats (i.e., Belding's savanna sparrow and light-footed clapper rail) that are not present onsite. The narrow strip of sandy beach habitat would also not be expected to support potential nesting activities for the western snowy plover due to high tides extending up to the toe of the coastal bluff. Non-native tree habitats in the region are known to support overwintering sites for the Monarch butterfly, and no potentially suitable overwintering habitat is present in the study area. The Monterey cypress trees and scattered eucalyptus trees in the area could potentially provide nesting opportunities for a variety of song birds and raptors known to occur in the region. For special status raptors such as the white-tailed kite (*Elanus leucurus*), no evidence of stick nests or direct observations of foraging individuals were made during the surveys.

Other special status wildlife that are known to occur in the region, and that are highly mobile species with the potential to occur onsite during foraging activities include a variety of birds protected under the Migratory Bird Treaty Act. As stated above, no large stick nests characteristic of raptors were observed in the study area, but small songbirds could utilize the various trees and shrub habitats for nesting. No signs of large wildlife activity were noted during the surveys. Due to regular human presence from visitors as well as maintenance personnel, wildlife activity other than small songbirds and western fence lizards, was low.

IMPACT ANALYSIS AND RECOMMENDED MITIGATION MEASURES

The following discussion, impact analysis and recommended mitigation measures are intended to help guide future development planning, and support the California Environmental Quality Act (CEQA) review process. The impact discussion addresses the range of impacts that would be expected to result from implementation of the proposed project. Review of the Beach Facilities Design Review Plan prepared by WATG (June 2017) coupled with the 2017 survey results provided the basis for this analysis.

The project as proposed would demolish the existing Beach House and construct a new similar facility to the east along the existing roadway. The footprint of the proposed new beach facilities as shown in the project plans prepared by WATG would be sited just outside the limits of mapped ESHA per the City of Goleta's ESHA map. Field work for this investigation confirmed that the existing paved road and immediately adjacent areas (i.e., the road shoulder) is disturbed and does not have contiguous cover of native plants. Still a small amount of the restored coastal sage scrub habitat would likely be impacted during construction. The existing Beach House footprint would be maintained similar to surrounding areas for continued beach visitor access, and select areas along the restored bluff would be restored with native habitat characteristic of surrounding areas.

Bio Impact 1. Demolition of the Beach House is expected to impact developed and landscaped areas. This is expected to be a less than significant impact pursuant to CEQA and no mitigation is required.

The proposed project would result in the removal of landscaping composed of trees and shrubs and the existing infrastructure associated with demolition of the Beach House. This is considered a less than significant impact from a biological resources perspective. Disturbed areas from those areas dominated by non-native species are not considered sensitive plant communities by the CDFW and are common throughout the region. Therefore, any loss of the existing developed or landscaped areas would be considered a less than significant impact pursuant to CEQA and mitigation would not be required to offset these impacts to a less than significant level.

In many instances, mitigation required for a separate potentially significant impact would further reduce impacts to developed and landscaped areas deemed less than significant during CEQA review. Such would be the case with the below discussion in Bio Impact 3 related to potential impacts to nesting birds.

Bio Impact 2. Construction of the new Beach House facility could impact the outer limits of restored coastal sage scrub habitat. This is a potentially significant impact that can be reduced to less than significant with the incorporation of mitigation.

The construction of the new Beach House facility would remove a thin band of coastal sage scrub estimated to be approximately 500 square feet of marginal habitat. Although the road edge and ongoing maintenance activities create a disturbance zone along the restored coastal sage scrub habitat, the edge effect of the new structure footprint and associated fuel management zone that may be required could create a larger area of disturbance. As such, defining the limits of construction activities and post-project habitat restoration would be required to offset the loss of coastal sage scrub habitat resulting from project implementation.

Prior to construction, a qualified biologist working with the project construction team shall delineate the limits of construction. Orange protective fencing or similar equivalent shall be installed along the perimeter of the native habitat areas to be preserved and protected.

Coastal sage scrub and native grassland restoration should occur in select areas where the Beach House is removed as well as any other temporary disturbance areas associated with construction of the new facility. Restoration activities shall be performed post grading to restore disturbance areas to native habitats. Habitat restoration and biotechnical erosion controls shall be an integral part of the project and restoration areas shall be identified on project plans.

All bare soils areas shall have appropriate erosion controls and other Best Management Practices (BMPs) installed to prevent erosion. The following seed mix or similar equivalent as evaluated by a qualified biologist shall be applied to the graded areas through either direct hand seeding or hydroseeding methods:

Native Grassland Erosion Control Seed Mix

Species	Application Rate (lbs/acre)
Bromus carinatus (California brome)	5
Hordeum brachyantherum (meadow barley)	5
Vulpia microstachys (six weeks fescue)	3
Stipa pulchra (purple needlegrass)	10
Trifolium wildenovii (tomcat clover)	5
Total	**28**

As part of the impacts to coastal sage scrub, a habitat mitigation and monitoring plan shall be prepared detailing the methods and techniques to restore areas impacted by the proposed project. The plan shall be developed by a qualified restoration ecologist and submitted to the City for their review and approval. The plan shall include at a minimum the goals and objectives of the program, the areas to be planted or seeded following grading and any weed abatement activities, planting and weed control methodologies, measures to protect plantings during the establishment period, irrigation methods and timing, monitoring methods and timing, success criteria, and reporting requirements. The plan shall be implemented concurrent with or immediately following construction. The plan shall also include contingency measures to cover unforeseen circumstances. An education program shall also be developed to inform the construction personnel of the important biological resources on the project site, and the importance of protecting these resources during construction.

Hydroseeding, hand seeding and installation of container plants shall be completed during the late fall or winter months to ensure success of the program. Should erosion controls be needed within the mitigation area, they shall be biodegradable. During construction, all appropriate stormwater Best Management Practices (BMPs) shall be employed to protect the beach from inadvertent impacts that could occur during construction.

Implementation of the above mitigation measure would reduce impacts to native bunchgrass grassland to a less than significant level.

Bio Impact 3. Future development of the site could adversely affect wildlife including nesting birds during construction. This is a potentially significant impact that can be reduced to less than significant with the incorporation of mitigation.

Because of the size of the site and degree of habitat diversity in the region, the loss of a small strip of scrub vegetation and developed/landscaped areas for the construction of the proposed project is anticipated to be less than significant. Further, the site does not provide a known wildlife movement corridor, and therefore construction of the new facility would not be expected to adversely affect wildlife migration or movement in the region. Considering the extent of current development in the region in relation to the amount of open space nearby, development would be considered a less than significant impact to wildlife resources.

Night Lighting. Existing development in the area already contributes to the light pollution at night, and any future development proposal of the site is not anticipated to increase the existing condition. Certain species of aerial-foraging bats may actually be helped by night lighting because

of their attraction to prey items such as flying insects. Night lighting should be kept to the minimum necessary for safety purposes and should comply with current City standards. Decorative lighting should be of as low intensity as possible.

Non-Native Species. The proposed project is not expected to further increase non-native animals such as house sparrows, European starlings, Norway and black rats, and house mice at the site. Given the site currently supports human activities, these species are present already. Future development could potentially introduce or maintain non-native invasive plants through landscaping, thereby promoting the spread of non-native plants and escape of ornamentals. This has been shown to impact wildlife, including special-status species in the region due to loss of food resources and cover. The landscaping plan developed for the project should be consistent with the project's restoration plan discussed under Impact Bio-2 above, and all previous restoration work conducted onsite to date.

Nesting Birds. To minimize impacts to nesting bird species, including species protected by the Migratory Bird Treaty Act, all shrub/tree trimming and removal shall be limited to outside the nesting season and focused during the time period between September 1 and February 1 as feasible. If initial site disturbance, grading, and shrub removal cannot be conducted during this time period, a pre-construction survey for active bird nests onsite shall be conducted by a qualified biologist.

Surveys shall be conducted within two weeks prior to any construction activities. If no active nests are located, ground disturbing/construction activities can proceed. If active nests or roosts are located, then all construction work shall be conducted outside a non-disturbance buffer zone to be developed by the qualified biologist based on the species (i.e., 50 feet for common species and upwards of 250 feet for raptors), slope aspect and surrounding vegetation. No direct disturbance to nests shall occur until the young are no longer reliant on the nest site as determined by the qualified biologist. The biologist shall conduct monitoring of any active nest identified during the survey until all young have fledged or the nest has been confirmed abandoned.

Worker Education. Before any construction activities commence on the project, the approved biologist shall conduct an environmental awareness training for all construction personnel. At a minimum, the training shall include a description of the biological resources present onsite and the general measures in place to avoid and protect them. Handouts may be used in the training session as appropriate.

CONCLUSION

The proposed demolition of the Bacara Resort Beach House would impact developed and landscaped areas. Construction of the new facility would be sited primarily on an existing paved road, and would extend onto the road shoulder and into a thin band of restored coastal sage scrub habitat. No special status habitats, plants or wildlife were identified within the study area during surveys conducted in the spring of 2017, and no state or federal listed species are expected to be impacted by the proposed project. The demolition of the existing Beach House and construction of the new facility would require removal of landscape vegetation and some native restored coastal sage scrub habitat. As a result, project activities could potentially affect nesting birds if construction occurs during the nesting bird season (defined as between February 1 and August 31).

In addition, the new facility would be in close proximity to restored coastal scrub habitat, some of which is defined as ESHA by the City of Goleta. Although City mapped ESHA would not be directly impacted by the project, and removal of common shrubs such as California sagebrush would not be a significant impact from a biological perspective, edge effects (i.e., the spread of non-native plants) once the project is constructed could further disrupt plant distribution and wildlife activities near the new facility. As such, mitigation measures identified above implemented prior to and during construction would reduce potential impacts to biological resources to a less than significant level pursuant to CEQA.

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Thank you for the opportunity to provide environmental consulting services for this project. I trust the above information is sufficient for your reporting requirements at this time. If you have any questions regarding the information contained herein, please contact me at the phone number listed above or via email at kmerk@kevinmerkassociates.com.

Sincerely,
KEVIN MERK ASSOCIATES, LLC

Kevin B. Merk
Principal Biologist

Attachments: *Table 1 – Special Status Biological Resources Occurrence Information*
Photo Plate
Figure 1 – Site Location Map
Figure 2 – Aerial Overview Map with NWI Data
Figure 3 – Habitat Map
Figure 4 – Soils Map
Figure 5- CNDDB Map (Plants)
Figure 6 – CNNDB Map (Wildlife)
Figure 7 – City of Goleta ESHA Map

Table 1. Special Status Biological Resources Occurrence Information.

Species	Status* Fed/CA/CNPS	Habitat Requirements	Project Site Suitability/Observations
PLANTS			
Black-flowered figwort *Scrophularia atrata*	--/--/1B.2	Perennial herb; blooms April through July; ranges from 10 to 500 meters in elevation; occurs in closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub, and riparian scrub habitats, typically on sandy or diatomaceous shale soils.	**Not expected.** Site contains suitable coastal scrub habitats, but no black-flowered figwort individuals were observed during site surveys conducted during the appropriate bloom period (March – June). Only the common *Scrophularia californica* was observed onsite. Nearest recorded occurrences in the CNDDB are to the west along the Union Pacific Railroad, and east near Devereux Slough and Coal Oil Point.
Contra Costa goldfields *Lasthenia conjugens*	FE/--/1B.1	Annual herb, occurs in association with vernal pools, wet meadows, and depressions, between 4 and 180 meters in elevation. Typically blooms from March through June.	**Not expected.** No suitable habitat present onsite for this species. While a small constructed swale was observed along the trail system in the southern part of the site, no Contra Costa goldfields or any other species of *Lasthenia* was observed. A single record of this species exists from 1973 when it was documented in a depression in a grain field in the vicinity of Isla Vista; however, it is since thought to be extirpated in the region and is not expected to occur in the project area.
Coulter's goldfields *Lasthenia glabrata* ssp. *coulteri*	--/--/1B.1	Annual herb that grows in coastal salt marshes, playas, valley and foothill grassland, and vernal pools usually on alkaline soils from 1- 1,400 meters in elevation.	**Not expected.** No suitable habitat present onsite for this species. While a small constructed swale was observed along the trail system in the southern part of the site, no species of *Lasthenia* was observed. Historically reported from Goleta Slough, and could occur further east of the site in the more developed salt marsh of Bell Canyon.
Coulter's saltbush *Atriplex coulteri*	--/--/1B.2	Perennial herb known from coastal bluff scrub, coastal dunes, coastal scrub and grassland habitats between 2 and 460 meters in elevation. Typically blooms from March through October.	**Not expected.** While potentially suitable coastal sage scrub is present within the study area, this species was not observed onsite during the field surveys. CNDDB record for this species in the region is from 1950's along the railroad right of way, and it questions whether it was an introduced occurrence.

Table 1. Special Status Biological Resources Occurrence Information.

Species	Status* Fed/CA/CNPS	Habitat Requirements	Project Site Suitability/Observations
Davidson's saltscale *Atriplex serenana* var. *davidsonii*	--/--/1B.2	Annual herb known to occur on alkaline soils in coastal sage scrub, wetland and riparian habitats, between 0 and 470 meters in elevation. Typically blooms from April through October.	**Not expected.** No suitable alkaline soils present within the study area. Not observed onsite. Species would have been in identifiable condition if observed during field surveys. CNDDB has 1947 record from general vicinity of Arroyo Burro/Hendry's Beach further east of the site, and it is uncertain if this species is still present in the area.
Estuary Seablite *Suaeda esteroa*	--/--/1B.2	Coastal salt marshes and swamps in southern California; elevation 0-120 meters. Typically blooms from May through October.	**Not expected.** No suitable habitat present in the project area. Historically reported from Goleta Slough near the beach. Not observed during field surveys.
Mesa horkelia *Horkelia cuneata* var. *puberula*	--/--/1B.1	Perennial herb that grows in sandy or gravelly sites in chaparral, coastal scrub and cismontane woodland; 15 to 1,645 meter elevation range. Typically blooms from February through July.	**Not expected.** While marginal habitat is present in the restored coastal sage scrub habitat within the project area, no species of *Horkelia* was observed during surveys. This herbaceous perennial would have been in identifiable condition if present. Further, nearest known occurrences in CNDDB are over 50 years old.
Santa Barbara honeysuckle *Lonicera subspicata* var. *subspicata*	--/--/1B.2	A shrub known to occur in chaparral, cismontane and coastal scrub habitats from 5 to 825 meters in elevation. Typically blooms from May through August.	**Not expected.** Although suitable coastal sage scrub habitat is present within the study area, it consisted of a dense stand of California sagebrush, *Encelia*, and coyote brush, and no honeysuckle plants were observed during the field surveys. Further, this species is typically found away from the immediate shoreline.
Sonoran maiden fern *Thelypteris puberula* var. *sonorensis*	--/--/2B.2	Rhizomatous fern that grows along streams, meadows and freshwater seeps typically in cool, shaded locations under riparian trees, between 40 and 790 meters in elevation. Typically blooms from January through September.	**Not expected.** No suitable habitat present. Not observed during surveys. Not expected to occur within the site or be affected by any project activities. Majority of occurrences in the region are at higher elevation sites in the Santa Ynez Mountains to the north.
Southern tarplant *Centromadia parryi* ssp. *australis*	--/--/1B.1	Annual herb found primarily on margins of marshes and swamps, and within valley and foothill annual grassland habitats containing vernal pools. Elevations range from 200 to 1320 meters. Often found in disturbed sites near the coast, and in alkaline soils. Typically blooms from May through November.	**Not expected.** Marginal habitat present within the restored coastal sage scrub and along road and trail margins. Not observed during field surveys, and closest known occurrences of this species are on the UCSB campus to the east and to the west of the site along the south side of Highway 101 between Eagle Canyon and Dos Pueblos Canyon.

Table 1. Special Status Biological Resources Occurrence Information.

Species	Status* Fed/CA/CNPS	Habitat Requirements	Project Site Suitability/Observations
WILDLIFE			
Belding's savannah sparrow *Passerculus sandwichensis beldingi*	--/SE/--	Coastal salt marshes from Santa Barbara County to the Mexican border. Nests on the ground in natural depression or scrape, primarily in pickleweed habitat above the reach of the highest spring tides.	**Not expected.** No suitable salt marsh and pickleweed habitat present in the study area.
California red-legged frog *Rana draytonii*	T/SSC/--	Lowlands and foothills in or near permanent or semi-permanent sources of deep water (at least 0.5 meter) bordered by emergent wetland and/or riparian vegetation. May use a variety of aquatic and upland habitats during the year for refugia and dispersal.	**Not expected.** No suitable habitat present in the study area. Suitable habitat and known occurrences of CRLF are present in Tecolote Creek to the west and Bell Canyon Creek to the east.
Crotch bumble bee *Bombus crotchii*	--/ SSC / --	Open grassland and scrub habitats from central California to Baja California del Norte, Mexico, including the western edges of the deserts and the Central Valley. Not found in the mountains or cool north coastal areas of California	**Unlikely**. Sites appear to be too close to the immediate coastline (i.e., cool coastal area). Scrub habitat onsite may provide sufficient pollen sources and the general vegetative diversity to attract or support the species, but unlikely to be affected by the proposed relocation of the Beach House on the site.
Ferruginous hawk *Buteo regalis*	--/WL/-- (nonbreeding/ wintering)	Open grasslands, sagebrush flats, desert scrub, low foothills and fringes of pinyon-juniper habitats. Eats mostly lagomorphs, ground squirrels and mice.	**Not expected.** No suitable grassland foraging habitat present on-site. This species typically does not nest in California. Could occur as a seasonal transient during fall/winter months that would not be affected by the proposed project.
Globose dune beetle *Coelus globosus*	--/SA/--	Foredunes and sand hummocks immediately bordering the coast from Bodega Bay Head to Ensenada, Baja California, and all of the Channel Islands except San Clemente Island.	**Not expected.** No suitable sand dune habitat present in the study area. Previous surveys of Tecolote Creek and Bell Canyon Creek dune areas have observed the species outside of the study area.
Light-footed clapper rail *Rallus longirostris levipes*	FE/SE	Saltwater tidal marshes dominated by pickleweed and cordgrass, from Santa Barbara County to San Diego County.	**Not expected.** No suitable salt marsh and pickleweed habitat present in the study area.

Table 1. Special Status Biological Resources Occurrence Information.

Species	Status* Fed/CA/CNPS	Habitat Requirements	Project Site Suitability/Observations
Mimic tryonia (=California brackishwater snail) *Tryonia imitator*	--/SA/--	Found only in permanently submerged areas in coastal lagoons.	**Not expected.** No suitable habitat present in study area.
Monarch butterfly *Danaus plexippus*	--/SA/--	Wind-protected tree groves of eucalyptus, Monterey pine and cypress with nectar and water sources nearby.	**Not expected.** No suitable overwintering habitat present within the study area. Species is known to historically overwinter in eucalyptus groves to the north and could potentially forage in study area, but recent analysis by Meade et al considered the historic overwintering site adversely affected by infrastructure development and tree removal.
Sandy beach tiger beetle *Cicindela hirticollis gravida*	--/SA/--	Inhabits area adjacent to non-brackish water along the coast of California from San Francisco Bay to Northern Mexico.	**Not expected.** No suitable habitat present within the study area. Potentially present in dunes located at the mouth of Tecolote and Bell Canyon Creeks.
Tidewater goby *Eucyclogobius newberryi*	E/SSC/--	Brackish water and lagoon habitats along the California coast from San Diego county to Del Norte county.	**Not expected.** No suitable aquatic habitat present in the study area. Documented in aquatic/brackish habitat within the lower reach of Tecolote and Bell Canyon Creeks, which is outside the disturbance area for this project.
Townsend's western big-eared bat *Corynorhinus townsendii*	--/-SSC/--	Requires caves, tunnels, mines, or similar man-made structures for roosting. This bat feeds primarily on moths, but will eat a variety of soft-bodied insects.	**Not expected.** No suitable roosting habitat present onsite. Could potentially forage over the study area, but not expected to adversely affected by the project.
Tri-colored blackbird *Agelaius tricolor*	CE/--/SSC (nesting)	Nests in freshwater marshes with tules or cattails, or in other dense vegetation such as thistle, blackberry, thickets, etc., in close proximity to open water. Forages in a variety of habitats including pastures, agricultural.	**Not expected.** No suitable nesting habitat present onsite. Could potentially forage over the study area, and nest in the Tecolote and Bell Canyon Creek lagoon areas. Not expected to adversely affected by the project.
Western pond turtle *Emys marmorata*	--/SSC/--	Permanent or nearly permanent water bodies in many habitats. Basking sites such as partially submerged logs, vegetation mats, or open mud banks.	**Not expected.** No suitable habitat present in the study area. Suitable habitat present in Tecolote Creek to the west and Bell Canyon Creek to the east, but no documented sightings in the immediate project vicinity.

Table 1. Special Status Biological Resources Occurrence Information.

Species	Status* Fed/CA/CNPS	Habitat Requirements	Project Site Suitability/Observations
Western snowy plover *Charadrius alexandrinus nivosus*	T/SSC/-- (nesting)	Sandy beaches, salt pond levees or shores of large alkali lakes. Sandy, gravelly or friable soils required for nesting. Federal listing refers only to the Pacific coastal population.	**Not expected.** No coastal dunes that could provide suitable nesting or foraging habitat present onsite. Could potentially forage along the immediate shoreline in close proximity to the study area, but not expected to nest in close proximity to the Beach House relocation site or be affected by the project.
White-tailed kite *Elanus leucurus*	--/FP/-- (nesting)	Riparian woodlands near agricultural fields; forages over open grasslands and scrub.	**Not expected**. No suitable nesting habitat within the proposed Beach House relocation site. While Monterey cypress and eucalyptus plantings are present in the general area, no large stick nests were observed onsite during surveys. Species is known to forage in grassland habitats to the west and east of the site, but would not be affected by the proposed project.
SPECIAL STATUS NATURAL COMMUNITIES and CRITICAL HABITATS			
Coastal Bluff Scrub			Not present in study area.
Riparian Scrub			Not present in study area
Southern Coastal Salt Marsh			Not present in study area.
Tidwater goby			Not present in study area.
Western snowy plover			Not present in study area.
Wetland			Not present in study area.

**E = Endangered; T = Threatened; R = Rare CE = Candidate for Endangered Status; SSC = California Species of Special Concern; FP = Fully Protected; WL = Watch List; SA – Special Animal; '—' = no status; List 1A – presumed extinct; List 1B – Rare, threatened, or endangered in California and elsewhere; List 2 – Rare, threatened or endangered in California, but more common elsewhere; List 4 – Limited distribution (Watch List). Source: California Natural Diversity Database (California Department of Fish and Wildlife 2017); California Native Plant Society Online Inventory of Rare Plants, accessed April 2017 (online at www.cnps.org); Special Animals List* (*California Department of Fish and Wildlife 2017); Special Vascular Plants, Bryophytes, and Lichens List (California Department of Fish and Wildlife 2017).*

Photo Plate

Photo 1. 1994 aerial of the site prior to construction.

Photo 2. 2002 aerial showing Beach House and Tennis Facility. Note the line demarcating the limits of landscaping in regards to coastal sage scrub habitat restoration.

Photo 3. 2003 aerial showing coastal sage scrub plantings establishing (circular vegetation pattern between Beach House and Tennis Facility).

Photo 4. 2007 aerial with coastal sage scrub habitat establishing with areas of grassland still visible (beige color pattern). Note amount of bluff present between Beach House/trails and ocean.

Photo 5. 2016 aerial with restored coastal sage scrub habitat established between Beach House and Tennis Facility. Note erosion of bluff at Beach House and trails.

Photo 6. Close up view of Beach House with temporary wall protecting tidal surge and bluff erosion. Note the ruderal/disturbed area along the road edges.

Photo 7. Easterly view of eroding bluff. The extent of exposed cobble varies throughout the season and becomes covered in sand later in the summer season.

Photo 8. Close up view of the temporary wall protecting the Beach House. Note sand with no exposed cobble in this location.

Photo 9. Westerly view of eroded bluff face below trail. Note fence near edge of bluff.

Photo 10. Westerly view looking toward Bell Canyon Creek mouth showing eroded bluff face with old exposed pipes.

Photo 11. Existing paved road and fire truck turn-around. Note actively used road margins with stockpiles of landscape materials to the right under the Monterey cypress plantings on hill.

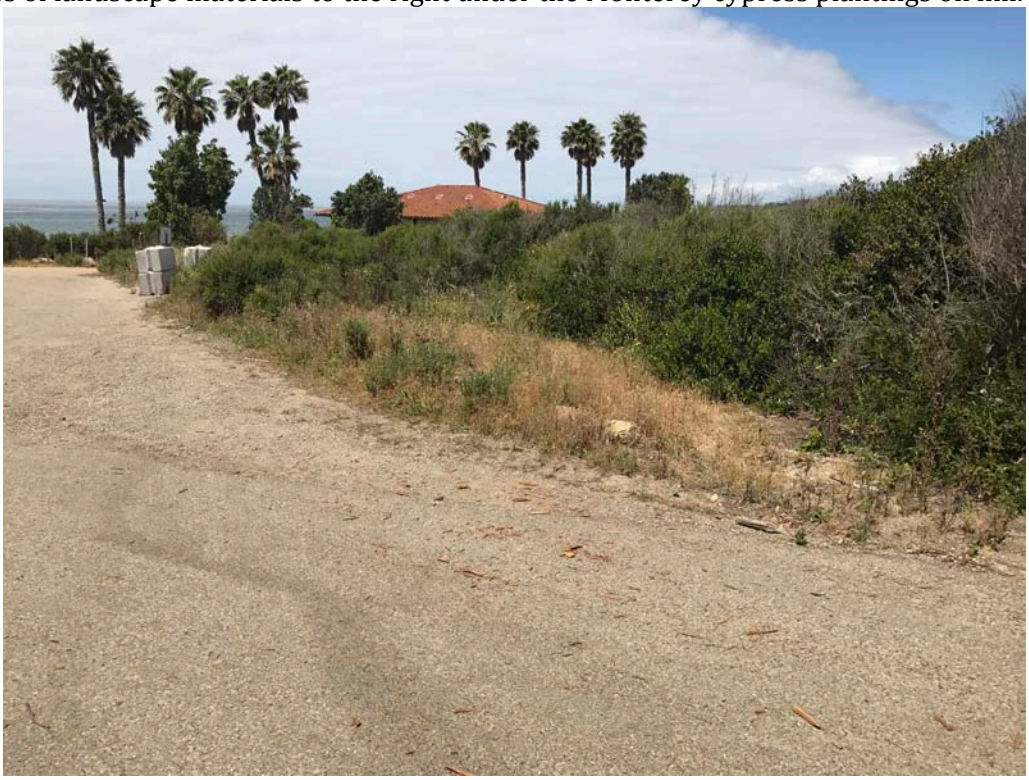
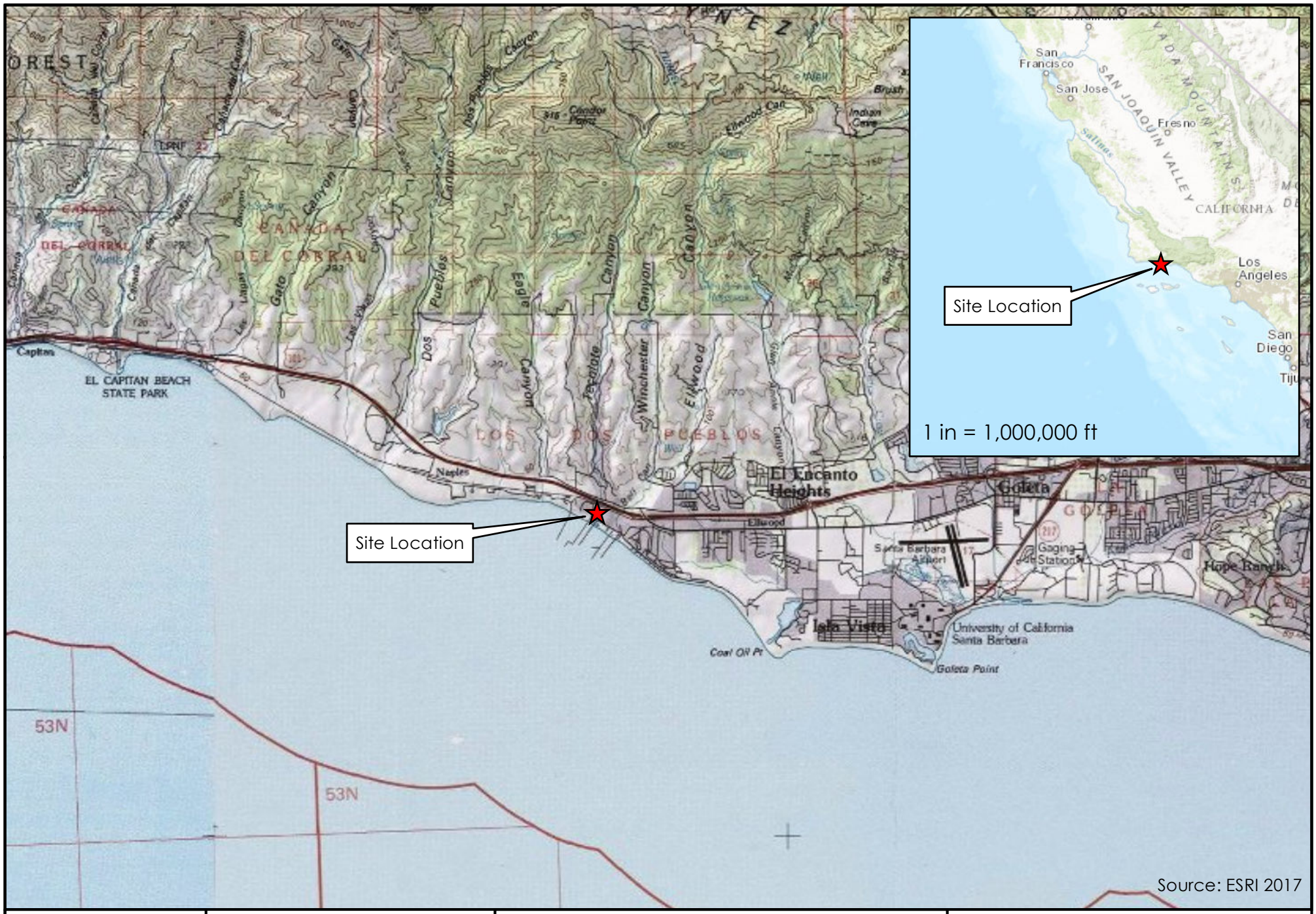


Photo 12. Proposed Beach House relocation site composed of pavement and disturbed road margin with non-native weeds that transition into coastal sage scrub restoration plantings.

Photo 13. Close up view of ruderal/disturbed area adjacent to road. Beach House relocation would reposition the road into this existing disturbed area.

Photo 14. Representative view of intact coastal sage scrub restored between the Beach House (visible to the left) and Tennis Facility. Resort is visible in the distance.



KEVIN MERK ASSOCIATES

1 in = 10,000 ft

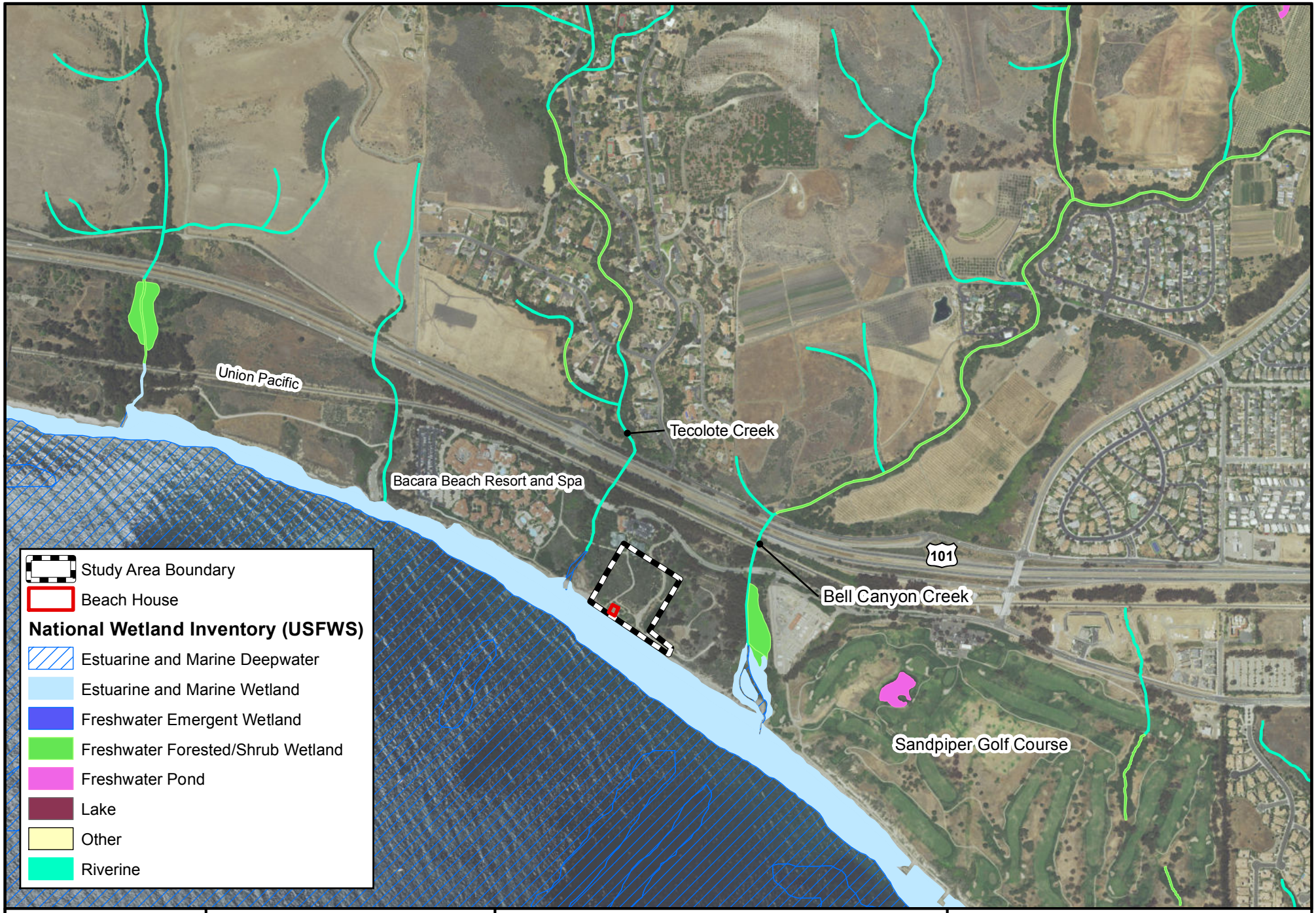
0 0.5 1 2 Miles

The Beach House Relocation Project

Bacara Resort and Spa

Figure 1

Site Location



KEVIN MERK ASSOCIATES

N
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1 in = 1,000 ft

0 335 670 1,340 Feet

The Beach House Relocation Project

Bacara Resort and Spa

Figure 2

Aerial Overview

KEVIN MERK ASSOCIATES

1 in = 150 ft

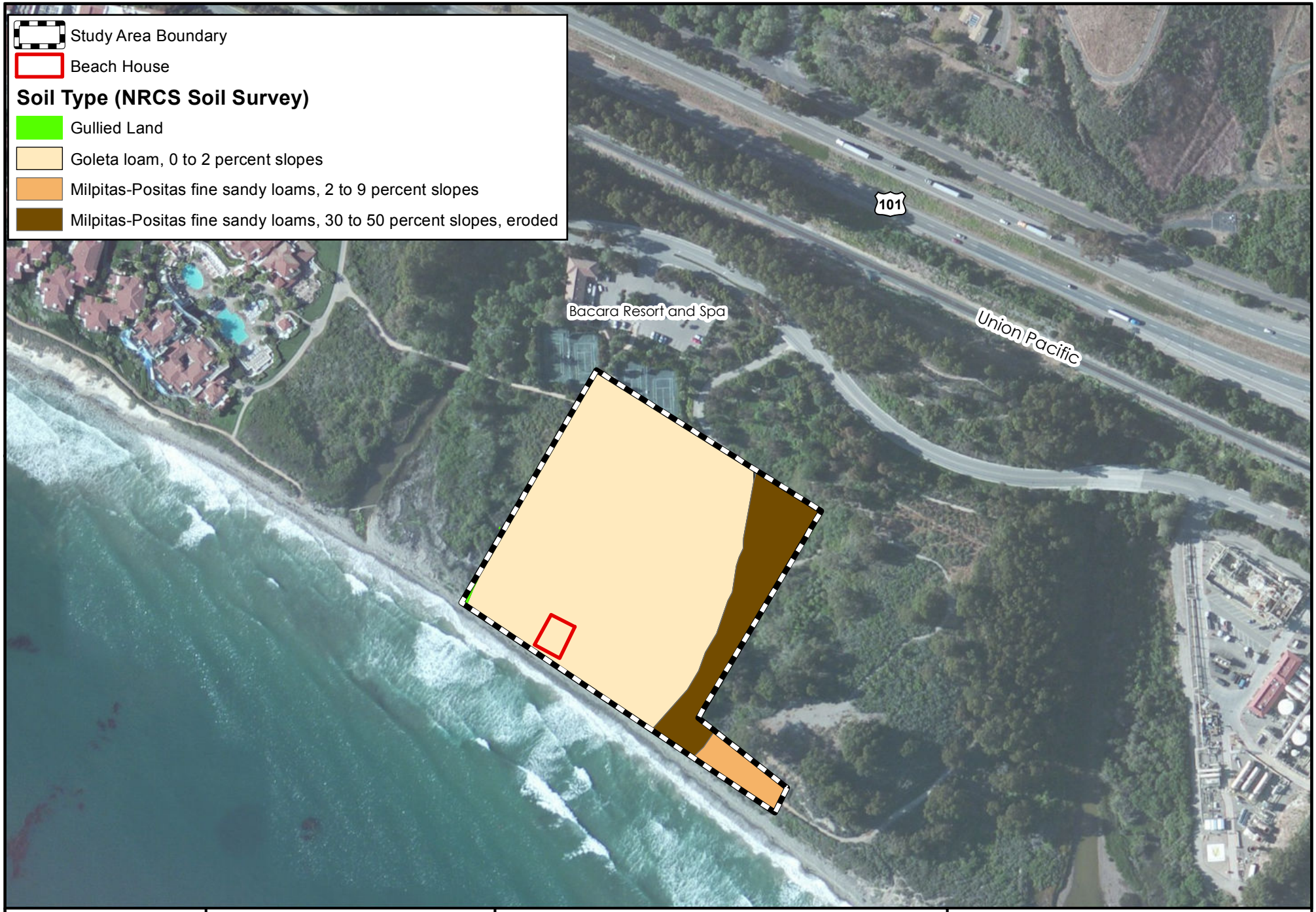
0 50 100 200 Feet

The Beach House Relocation Project

Bacara Resort and Spa

Figure 3

Habitat Map



KEVIN MERK ASSOCIATES

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1 in = 250 ft

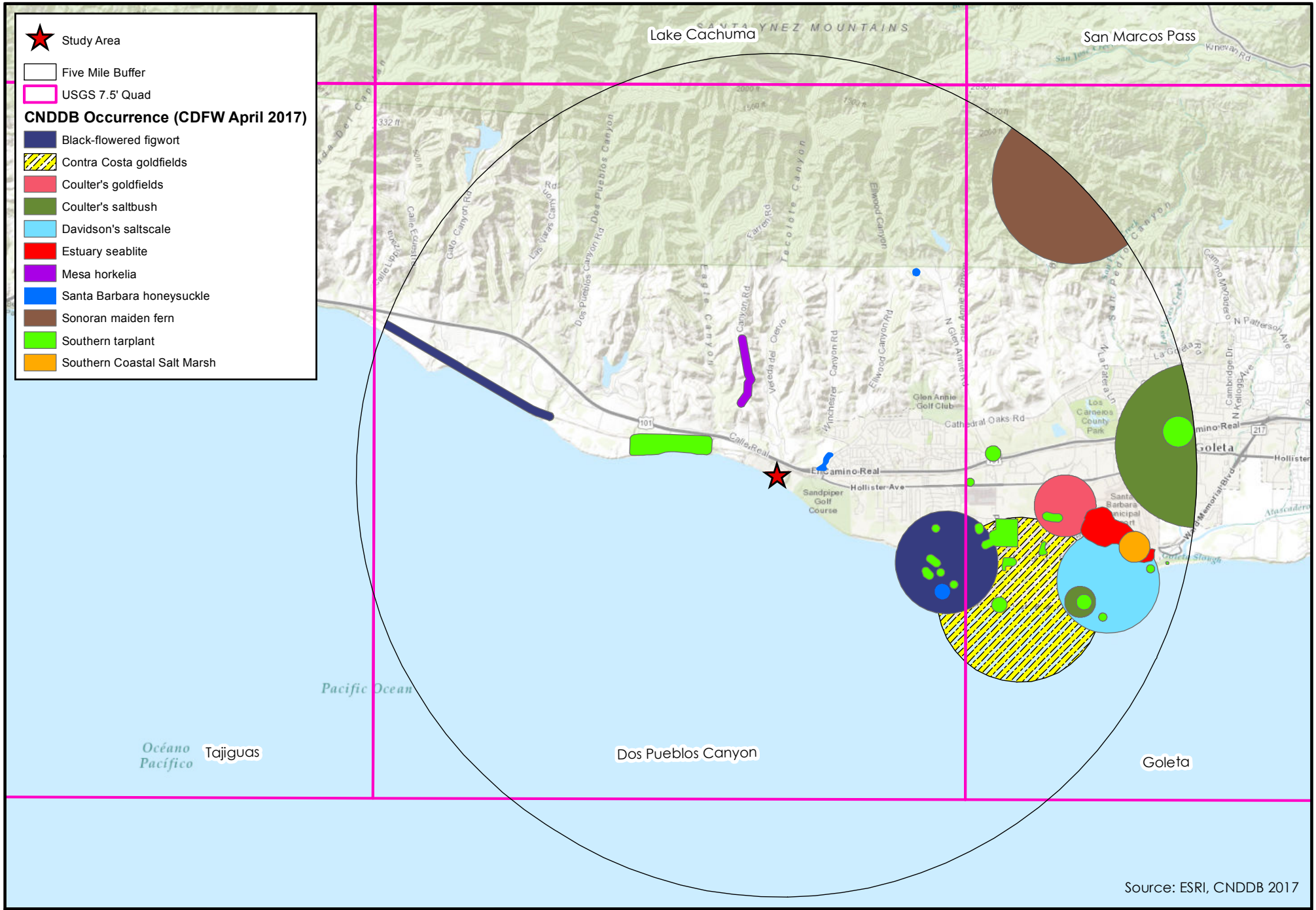
0 80 160 320 Feet

The Beach House Relocation Project

Bacara Resort and Spa

Figure 4

Soil Map



KEVIN MERK ASSOCIATES

1 in = 8,000 ft

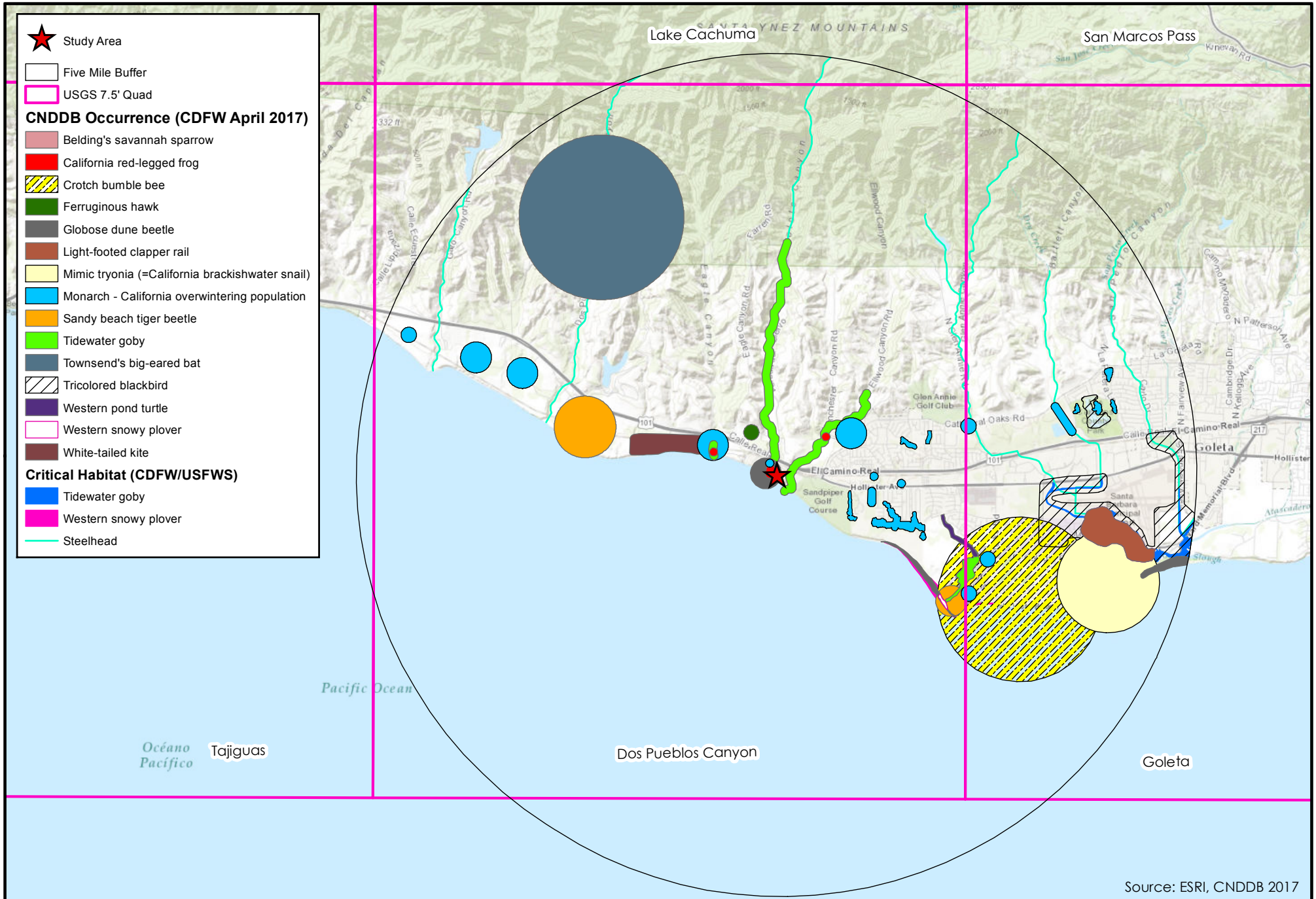
0 2,650 5,300 10,600 Feet

The Beach House Relocation Project

Bacara Resort and Spa

Figure 5

CNDDB Occurrence Map



KEVIN MERK ASSOCIATES

1 in = 8,000 ft

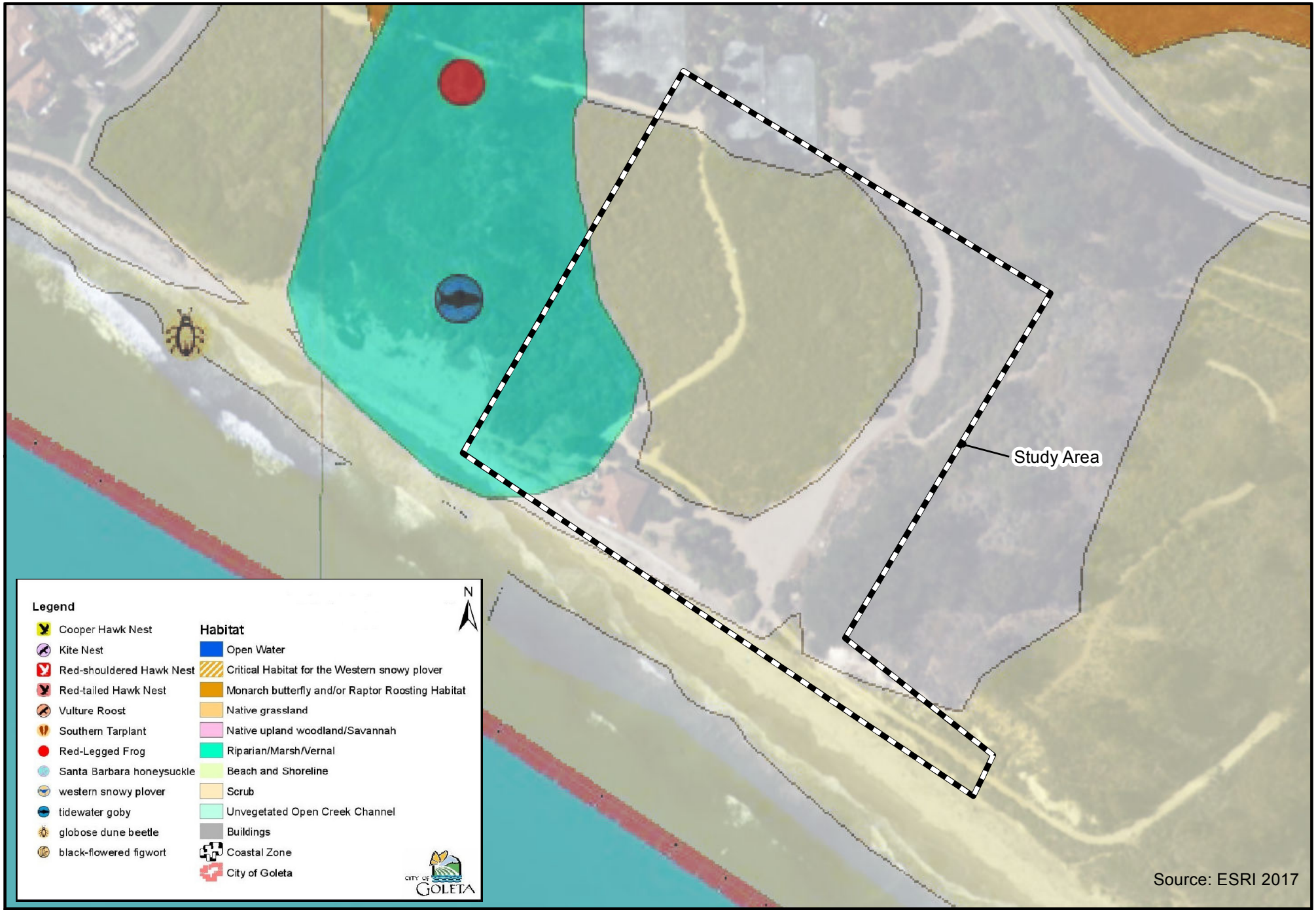
0 2,650 5,300 10,600 Feet

The Beach House Relocation Project

Bacara Resort and Spa

Figure 6

CNDDB Animal Occurrence Map



KEVIN MERK ASSOCIATES

N W E S

1 in = 150 ft

0 50 100 200 Feet

The Beach House Relocation Project

Bacara Resort and Spa

Figure 7

ESHA Delineation Map