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MEMORANDUM

To: Mary Chang, City of Goleta Planning and Environmental Review

From: Justine Cooper and John Storrer, Consulting Biologists

Date: July 4, 2018

Re: Review of "Biological Resource Assessment for the Bacara Beach House Relocation Project, Goleta, Santa Barbara County, California" and "Supplemental Biological Technical Report for the Ritz-Carlton Bacara Beach House Demolition and Replacement Project, Santa Barbra County, California"

Per your request, we reviewed the referenced Supplemental Technical Report (Supplemental Report) prepared by Dudek for Watermark Capital Partners, LLC (Watermark) dated May 11, 2018. The Supplemental Report was submitted in support of Watermark's application for a permit to demolish and replace the existing Beach House on Ritz-Carlton's Bacara Resort property in western Goleta (Project). The Biological Resource Assessment (Assessment) prepared for previous landowners by Kevin Merk Associates, LLC (KMA) dated 10 July 2017, was also reviewed. Our review and comments focus on information concerning biological resources in the Project vicinity, potential for impacts to these resources, and adequacy and practicality of proposed minimization and avoidance measures.

Please consider the following comments:

The KMA Assessment provides details on the existing conditions, a Project impact assessment, and recommended mitigation measures. However, the precise location for the new Beach House had not been defined when the Assessment was prepared. The Dudek Supplemental Report provides a more relevant analysis of the existing conditions and potential Project impacts. The Assessment will only be referenced in this review in regard to its recommended mitigation measures - these are supported by Dudek in their Supplemental Report.

The current location of the Bacara Beach House at Haskell's Beach is on an elevated terrace above the cobble-lined shoreline. The proposed facility is situated further inland, to the east of the fire access road and adjacent to the northwestern slope of the "East Terrace" (Appendix A – Figure 1) (Site).

The Supplemental Report consisted of both background review and field survey. The field survey was performed on April 19, 2018. The Supplemental Report is intended to "describe the existing biological resources (including vegetation, flora, fauna, jurisdictional features, and wildlife habitats/movement corridors), potential project impacts, and recommended avoidance, minimization, and mitigation measures associated with Project".

Sources regarding presence or potential for occurrence of special-status biotic communities and plant and wildlife species were consulted. These included a query of the California Natural Diversity Data Base (CNDDB), U.S. Fish and Wildlife Service (USFWS) critical habitat information, and the National Wetlands Inventory, and City of Goleta Environmentally Sensitive Habitat (ESHA) overlay. The database information focused on special-status species known to occur in the six surrounding USGS quadrangles (Santa Ynez, Lake Cachuma, San Marcos Pass, Tajiguas, Dos Pueblos Canyon, and Goleta). Lists generated from the database query are provided in Appendices B and C.

Descriptions and classifications of plant communities and species conform to accepted sources and nomenclature (e.g., Baldwin et al. 2012). Primary vegetation types were mapped and described (Appendix A – Figure 2). Field surveys included mapping of vegetation within the Site and sensitive wildlife surveys. Sensitive wildlife surveys specific for the Monarch butterfly were performed in February 2017 (Appendix D). Inventories of plant and animal species observed on the Site are not provided. However, given the relatively narrow scope of the project and the level of associated impacts, the evaluation of habitat value provided is sufficient.

No special-status plant or animal species were detected during field surveys and no rare plant species are expected to occur within the Site boundaries. The Project is not expected to impact potential wildlife movement routes or corridors. These conclusions seem valid in consideration of the Site context and prior level of disturbance within the development footprint.

All Project impacts are limited to disturbed or developed/landscaped areas. However, the proposed beach facilities are within a 25-foot Coastal Sage Scrub ESHA buffer. The City of Goleta's General Plan (City GP)/County Coastal Land Use Plan (CLUP) Policy CE 1.6 requires a sufficient setback or buffer from ESHA to ensure that habitat value and function isn't degraded directly or indirectly by development of a project.

The analysis of the proposed reduction of the ESHA buffer (Appendix E) concluded that it will not result in significant impacts to the Coastal Sage Scrub ESHA because:

- The proposed location of the new beach facilities is situated on previously disturbed land just west of the existing emergency access road.
- The proposed location of the new beach facilities avoids impacts to existing enhanced coastal sage scrub habitat from previous project mitigation and the Monterey cypress mitigation site to the north.
- No special-status species are known to occur within the scrub on the property, nor is the habitat unique for the area.
- The development of the new beach facilities will not affect the availability of food, shelter, nesting, or movement between other habitats.
- The current location of the beach facilities is between two ESHA types (beach/shoreline and coastal sage scrub). If the Project is approved the existing facilities could be demolished and restored at least in part to native habitat.
- The City did not map the East Terrace as ESHA in their CP/CLUP.

The only potentially significant impact identified in the KMA Report that was relevant to the current Project and supported by Dudek, was the potential for the future development of the site

to adversely affect nesting birds during construction (Bio Impact 3). The mitigation measures provided in the KMA Report are reasonable and would successfully minimize impacts to nesting bird species.

A restoration plan for the Haskell's Beach House Demolition was included in the Report (Appendix F). Implementation strategies outlined in the Plan, including planting palettes, planting specifications, site preparation, and irrigation requirements are thorough and appropriate to the Site. A comprehensive list of Best Management Practices (BMPs) to be implemented during restoration is also included.

The implementation and maintenance schedules are accurate and provide sufficient detail. The Plan also includes contingencies for plant replacement, re-seeding, and irrigation for each restoration area. Maintenance activities include weed control using a combination of hand weeding and herbicide treatment, mowing, plant replacement, and Site protection (e.g., fencing).

Success criteria and performance standards are reasonable and fitting for the habitat types being restored. A combination of qualitative and quantitative methods will be used to evaluate progress toward attainment of performance standards. Monitoring methods, frequency of monitoring, and reporting requirements are adequately described. Appropriate adaptive management techniques and corrective measures are also outlined.

In summary, the Supplemental Report provides an accurate description of wildlife habitat and vegetation types within and adjacent to the Site. The general evaluation of the potential for special-status plant and animal species is appropriate for the size and scope of the Project. The proposed restoration plan for the demolition of the Beach House was found to be thorough and appropriate to the Site. Rationale for development within the degraded 25-foot ESHA buffer is provided and the conclusion that no significant adverse effects to the Coastal Sage Scrub ESHA will result from Project implementation is well reasoned. The recommended mitigation measure to minimize impacts to nesting bird species is also reasonable. Please call me if you have any questions concerning our comments.

Sincerely,

Justine Cooper
Storrer Environmental Services, LLC

John Storrer
Storrer Environmental Services, LLC

References

Baldwin, B. G., D. H. Goldman, D. J. Keil, R. Patterson, T. J. Rosatti, and D. H. Wilken, editors. 2012. *The Jepson Manual: Vascular Plants of California, Second Edition*, Revised. University of California Press, Berkeley and Los Angeles.

Dudek. 2018. Supplemental Biological Technical Report for the Ritz-Carlton Bacara Beach House Demolition and Replacement Project, Santa Barbra County, California. Prepared by Dudek, Santa Barbara, CA. Prepared for Watermark Capital Partners, LLC., Chicago, IL. May 11.

KMA (Kevin Merk Associates, LLC). 2017. Biological Resources Assessment for the Bacara Beach House Relocation Project, Goleta, Santa Barbara County, California. Prepared by Kevin Merk Associates, LLC, San Luis Obispo, CA. Prepared for CAA Planning, Inc., Aliso Viejo, CA. July 10.