ATTACHMENT 9
Planning Commission Hearing - Comment Letters

Villalobos, David

From: Scott Cooper <scooper@lifesci.ucsb.edu>
Sent: Tuesday, May 01, 2018 8:23 PM
To: Villalobos, David
Subject: To County Planning Commission: Comments on ESH map update for Eastern Goleta Valley Community Plan

Categories: Purple Category

I would like to submit the following comments to the County of Santa Barbara's Planning Commission regarding the Eastern Goleta Valley Community Plan ESH Map Update, being considered at today's (May 2) Planning Commission meeting. Thank you.

May 1, 2018

Chairman David Blough

County of Santa Barbara Planning Commission

123 East Anapamu St.

Santa Barbara, CA 93101

Dear Chair Blough and Commissioners,

Thank you for this opportunity to comment on the Eastern Goleta Valley Community Plan ESH Map Update. My name is Scott Cooper and I am a Research Professor of Ecology at UCSB, have conducted research in local watersheds for nearly 40 years, and have followed the approval of the Eastern Goleta Valley Community Plan (EGVCP) and the development of its associated map of Environmentally Sensitive Habitat (ESH). I offer the following comments to you because I think that complete, accurate ESH maps are an important part of sound, long-term planning because they provide property owners, developers, agencies, NGOs, and citizens with clear guidance about constraints on human development and activities in specific areas.

I think that County staff and their consultants have done a very good job of updating the vegetation map for the Eastern Goleta Valley, particularly in delineating sensitive and protected riparian zones and streams. The draft map, however, is not an ESH map because it neglects many of the habitats designated as ESH in the recently-approved EGVCP. Policy ECO-EGV-5.4 lists a set of habitats that are considered ESH, but not included on the map, such as chaparral supporting sensitive native plant and/or animal species, native grasslands, raptor-vulture roosts, and wildlife corridors. The minimum mapping area (1 acre for upland areas) was not fine enough to show local features, such as raptor-vulture roosts, and existing information on other ESH types (such as those supporting sensitive species), was not incorporated into the draft map. Further, Policy ECO-EGV-5.2 also indicates that areas with rare and endangered species, a rich fauna and flora, an unusual diversity of species, high biological productivity and ecological function, and protective of watershed ecology and species should be designated as ESH, but these criteria were not used in creating the draft map. In many cases, undesignated habitat, such as old growth chaparral, would qualify as ESH under these provisions. Finally, EGVCP Action AGV-5A calls for studies and the updating of maps given the current extent of known biological resources and habitat areas. Because there is extensive information on biological resources and habitat areas in the Eastern Goleta Valley that was not used in creating the draft map, it appears that this action has not been honored.

In short, the updated ESH map is an improved vegetation map, not an ESH map. The updated map is a good first step towards creating a complete ESH map, but needs to be augmented by additional studies, analyses, and mapping. I

suggest that the Planning Commission ask staff to prepare a project plan to map the ESH types listed in the EGVCP that were not incorporated into the updated draft map. I believe that these efforts would produce a complete ESH map congruent with the provisions of the EGVCP, providing a clear foundation for sound, rigorous planning.

Thank you for your time and consideration.

Sincerely,

Scott D. Cooper, Research Professor

Department of Ecology, Evolution, and Marine Biology

University of California

Santa Barbara, CA 93106

Villalobos, David

From: Gail Osherenko <gail.osherenko@gmail.com>
Sent: Tuesday, May 01, 2018 7:50 PM
To: Villalobos, David
Subject: Protecting ESH

Categories: Purple Category

I can't make your meeting but strongly support protection of ESHA in Santa Barbara County. We need these ecologically sensitive habitats.!
Gail

Gail Osherenko
835 Via Granada
SB 93103
--

BROKE:THE SANTA BARBARA OIL PIPELINE SPILL OF 2015

AGENDA ITEMS
ITEM #: 4
MEETING DATE: 5-2-18

May 1, 2018

Chairman Daniel Blough
Santa Barbara County Planning Commission
123 E. Anapamu Street
Santa Barbara, CA 93101

RECEIVED
MAY 02 2018
S.B. COUNTY
PLANNING & DEVELOPMENT
ITS/GIMS SUPPORT

Re: Eastern Goleta Valley Community Plan ESH Map Update

Dear Chair Blough and Commissioners:

Thank you for this opportunity to submit comments on the Eastern Goleta Valley Community Plan ("EGVCP") Environmentally Sensitive Habitat ("ESH") Map Update Project ("Project"). Los Padres ForestWatch is a non-profit organization working to protect the Los Padres National Forest and other public lands along California's central coast through advocacy, stewardship, and legal action. The Project identifies 236 acres of previously unmapped ESH, much of which is located within the Los Padres National Forest. We generally support this addition to the new ESH Map, and we support the language of the disclaimer included on the ESH Map that references missing types of ESH and applicable EGVCP policies. However, we have some suggestions to improve the Project going forward.

The new ESH Map does not include all ESHs as defined and protected in the EGVCP. The Project should include renaming the ESH Map to the EGVCP "Vegetation Map" in order to clarify for the public that the Map does not include many types of ESH, including: rare vegetation alliances under one acre (except wetlands), previously unknown alliances, finer-level rare vegetation associations, sensitive animal species, sensitive native flora, and other known ESHs such as turkey vulture and raptor roosts and nests.

Moreover, we encourage the Commission to recommend that the Board allocate additional funding to complete the ESH Map by adding the several omitted ESHs. As noted by Planning Staff, the County did not have the appropriate amount of funding to fully map these other ESHs. We encourage the Commission to direct Planning Staff to present a new ESH Mapping Project as part of the 2019 Long Range Planning Work Program. This ESH Mapping Project would map the types of ESH omitted from the current Project.

Thank you for this opportunity to provide comments on the EGVCP ESH Map Update Project.

Sincerely,

Bryant Baker

Bryant Baker, Conservation Director

Headquarters: Post Office Box 831 • Santa Barbara, CA 93102 I Post Office Box 98 • Ojai, CA 93024 I Post Office Box 499 • San Luis Obispo, CA 93406
805-617-4610 • WWW.LPFW.ORG

AGENDA ITEMS

ITEM #: 4

MEETING DATE: 5-2-18

May 2nd, 2018

Dear members of the Planning Commission,

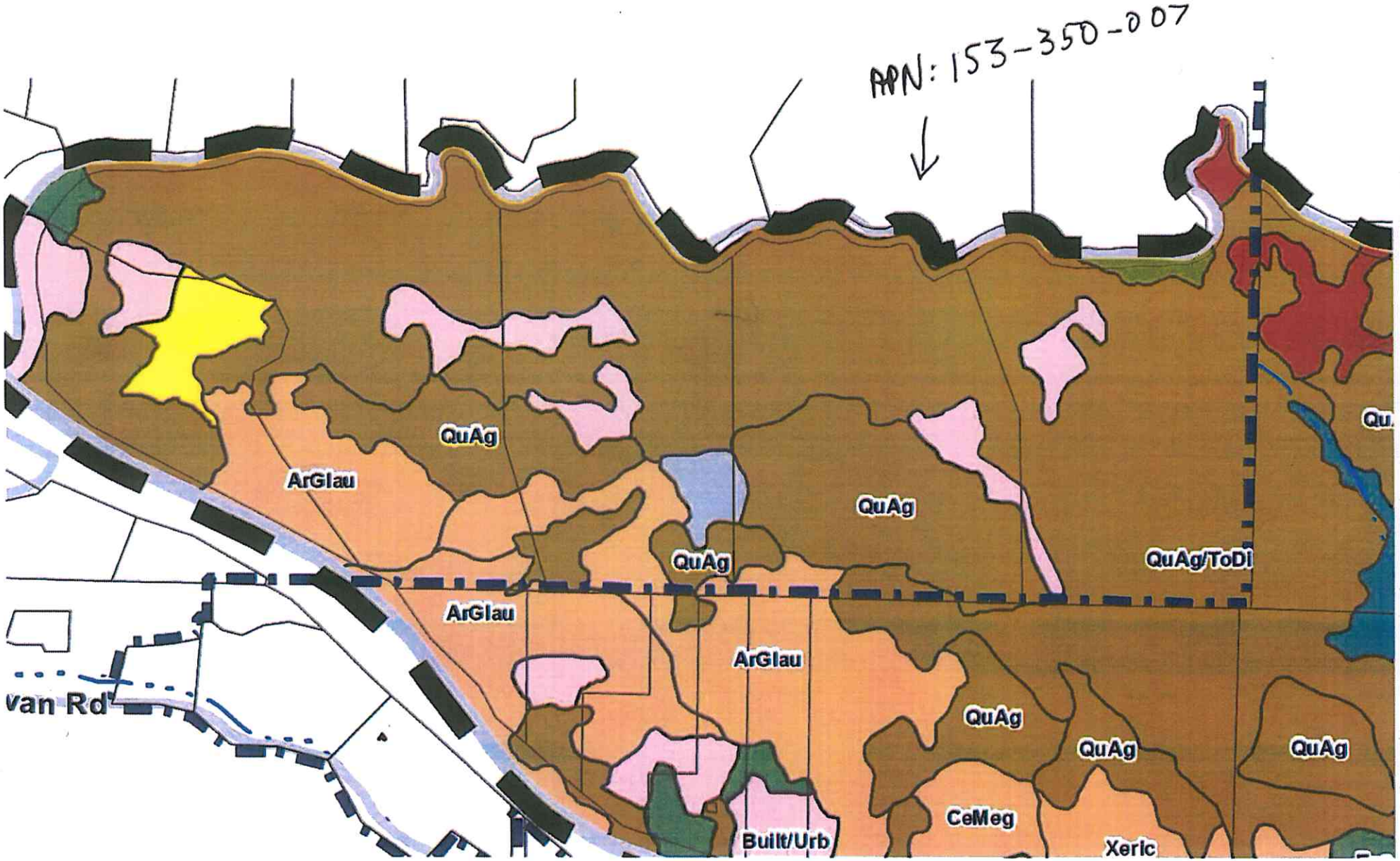
The ESH overlay proposed for my lot (APN 153-350-007) is inappropriate as the vegetation map must reflect reality on the ground. The map was derived from aerial photographs from 2015. No one from the planning staff or from Aerial Information Systems Inc. ever made an attempt to contact me to verify their assessment of the image interpreter. Figure 5 of the staff report states that field verification boiled down to taking some photographs along East Camino Cielo, which does not offer a view of the South side of my lot. The data is erroneous and the map is inaccurate. The attached photos, all taken in the area added to the EHS overlay show that the oak coverage is sparse, and that the ground has been stripped of weeds and brush. The designation of ESH implies that there is a habitat. As shown on the attached pictures, the vegetation below the oaks and in the open space is gone. The area added does not have any habitat and does not qualify as "sensitive habitat". Since the oaks are protected by the oak ordinance, the EHS overlay is not justified. I petition you to remove the added overlay, which raises the ESH designation on my lot from 40% to 95%. Thank you for your consideration.

RECEIVED

MAY 02 2018

S.B. COUNTY
PLANNING & DEVELOPMENT

Phillip Fanchon
5201 E. Camino Cielo
Santa Barbara, CA 93105
805 964 0387


APN: 153-350-007
QuAg
ArGlau
QuAg
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ArGlau
van Rd
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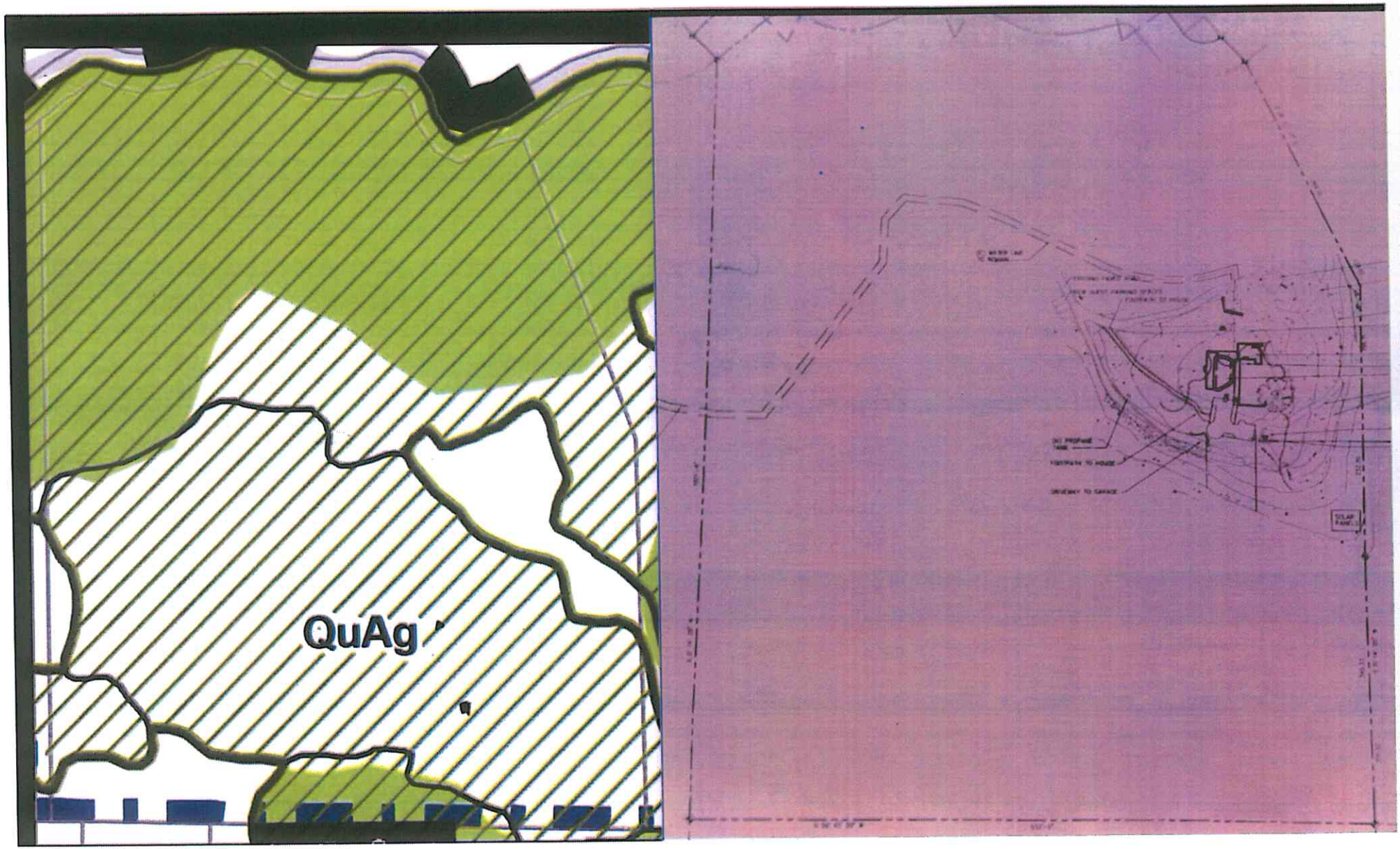
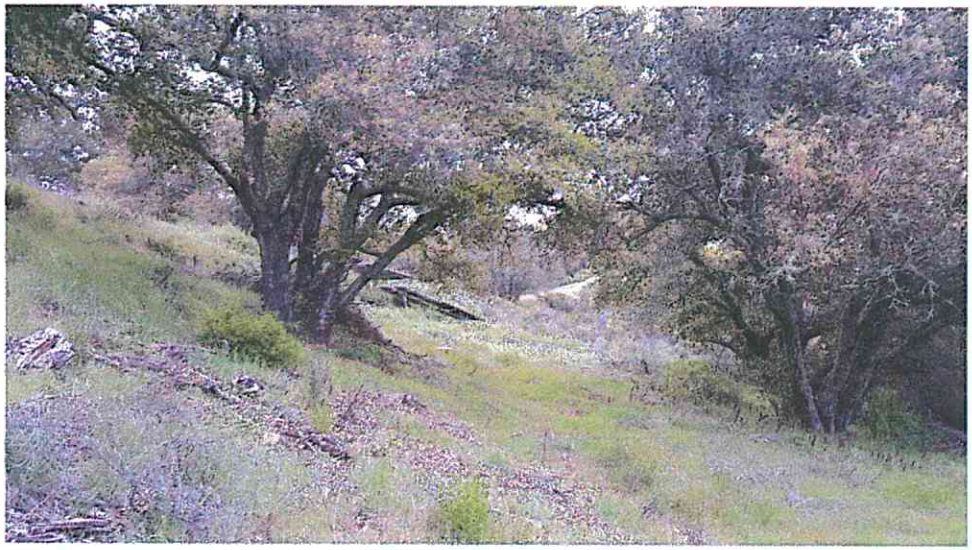
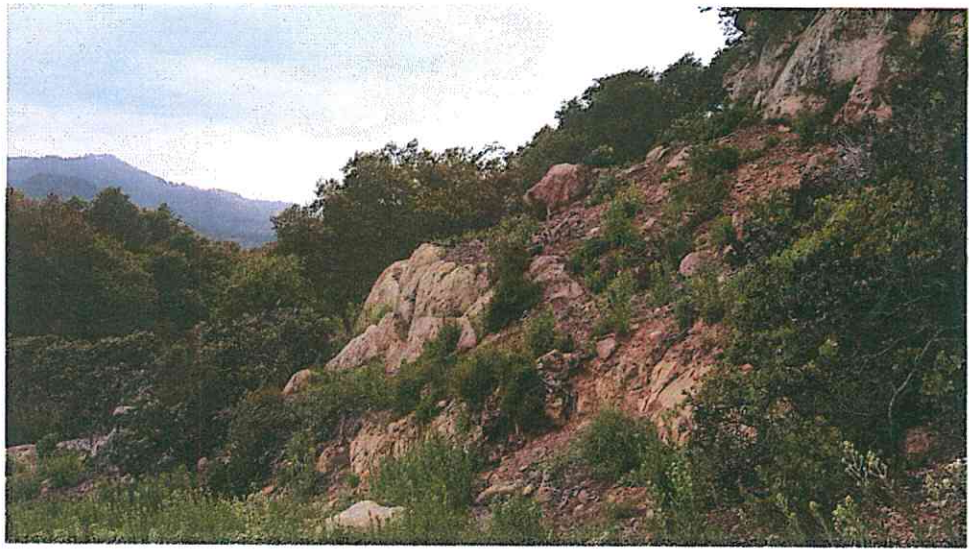
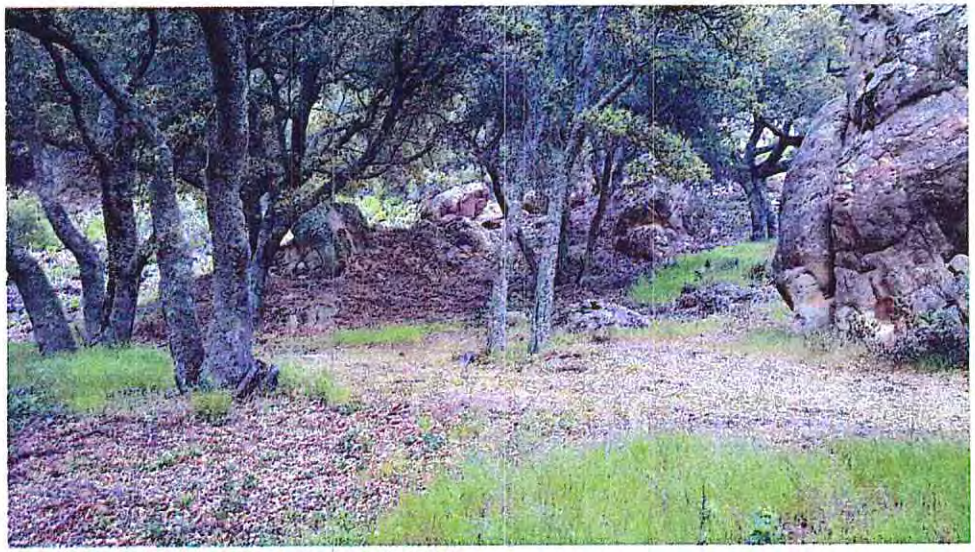
QuAg
QuAg
CeMeg
Built/Urb
Xeric

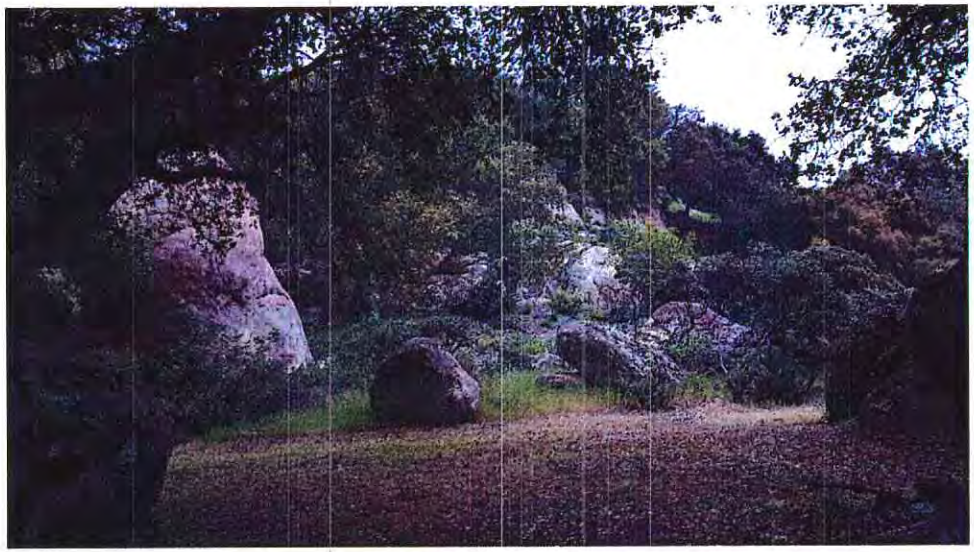

QuAg


© 2018 Google
Google Earth
Tour Guide
1994
Imagery Date: 2/3/2018 34°30'30.73" N 119°48'47.72" W elev 2342 ft eye alt 2919 ft









CALIFORNIA
NATIVE PLANT SOCIETY

Santa Barbara County
Planning Commission
123 E. Anapamu Street
Santa Barbara, CA 93101
Submitted electronically to: David Villalobos, dvillalo@co.santa-barbara.ca.us

RE: Eastern Goleta Valley Community Plan Environmentally Sensitive Habitat/Riparian Corridor Land Use and Zoning Overlays Map Update

Dear Santa Barbara County Planning Commission,

Thank you very much for the opportunity to provide comments on the Eastern Goleta Valley Community Plan (EGVCP) Environmentally Sensitive Habitat and Riparian Corridor (ESH/RC) Land Use Overlay, for the Rural Area, of the Land Use Element of the Santa Barbara County Comprehensive Plan. The mapping of ESHs highlights the importance of chaparral and other sensitive habitats and provides an increased opportunity for the conservation of important biological resources in the EGVCP area.

The California Native Plant Society ("CNPS") is a non-profit environmental organization with nearly 10,000 members. CNPS' mission is to protect California's native plant heritage and preserve it for future generations through application of science, research, education, and conservation. CNPS works closely with decision-makers, scientists, and local planners to advocate for well-informed and environmentally friendly policies, regulations, and land management practices. In line with our mission, we provide the following comments and recommendations regarding the mapping of ESHs in the EGVCP area.

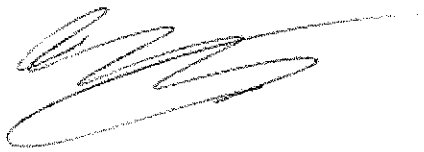
The current version of the draft of the map is a step forward in identifying and protecting sensitive biological resources in the Eastern Goleta Valley. Notably, it identifies an additional 236 acres of ESHs. However, there are a number of key omissions from the current mapping effort including rare vegetation associations identified in the Manual of California Vegetation[1] and the California Department of Fish and Wildlife's Sensitive Natural Communities List[2], known stands of rare vegetation alliances under one acre in size, habitat for rare plant and/or animal species, and stands of native grasses. Considering these omissions it is inaccurate to characterize the ESH as a map of all "Environmentally Sensitive Habitats." These omissions could lead to land management decisions that could adversely affect habitats that should be prioritized for protection but are not included in the current mapping effort.

[1] http://vegetation.cnps.org/
[2] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline

Additionally, we support "disclaimer" language recommended by planning department staff that clarifies the types of sensitive habitats that are not included on the maps. Specifically, we support labeling the map as a "Vegetation Map" rather than an "ESH Map." Furthermore, we support future revisions to the map that include the omitted habitats detailed above. The Planning Commission should direct the staff to bring forth a new ESH Mapping Proposal as part of the Long Range Planning Division's 2019 Work Program.

Thank you very much for this opportunity to comment. Please feel free to contact me with any questions.

Sincerely,



Nicholas Jensen, PhD
Southern California Conservation Analyst
California Native Plant Society
1500 North College Ave
Claremont, CA 91711
(530) 368-7839
njensen@cnps.org

Villalobos, David

From: Don & Sally Webb <sdwebb@cox.net>
Sent: Tuesday, May 01, 2018 11:50 AM
To: Villalobos, David
Subject: Protecting ESH

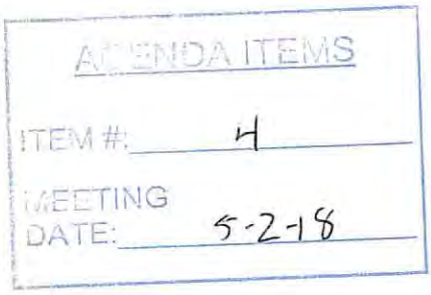
- I support the draft ESH Map. However, since it omits several types of ESH and maps only vegetation types, it must be renamed a Vegetation Map.
- Staff's disclaimer language properly identifies missing types of ESH and should be prominently highlighted on the map.
- I urge you to recommend that the Board of Supervisors allocate funds to the Long Range Planning Division to map the other types of ESH through the 2019 Work Plan.

Sally Webb
621 Cowles Rd.
Santa barbara, CA 93108

Villalobos, David

From: blumvicky@gmail.com
Sent: Tuesday, May 01, 2018 10:53 AM
To: Villalobos, David
Subject: Protecting ESH

Categories: Purple Category



To: The Santa Barbara Planning Commission

I support the draft ESH Map, although since it maps only vegetation types and omits several types of ESH, I believe that it should be named a Vegetation Map.

I also believe that the BOS should allocate funds to the Long Range Planning Division to map the other types of ESH through the 2019 Work Plan. I hope that you'll make that recommendation.

Thank you for your consideration,

Vicky Blum

Villalobos, David

From: Barbara Massey <masseybarb@aol.com>
Sent: Tuesday, May 01, 2018 10:08 AM
To: Villalobos, David
Subject: Eastern Goleta Valley Community Plan, Item 4 on PC Agenda

Categories: Purple Category

AGENDA ITEMS
ITEM #: 4
MEETING DATE: 5-2-18

Planning Commissioners,

I ask that you approve the draft ESHA Map. Since it omits several types of ESH and maps only vegetation types, it should be renamed a Vegetation Map. Language properly identifying the missing types of ESH should be highlighted on the map.

Please recommend that the Board of Supervisors allocate funds to the Long Range Planning Division for the mapping of the other types of ESH through the 2019 Work Plan.

Thank you for helping protect our critical habitat in the Eastern Goleta Valley.

Sincerely, Barbara Massey
Goleta
masseybarb@aol.com

RECEIVED
MAY 01 2018
S.B. COUNTY
PLANNING & DEVELOPMENT
HEARING SUPPORT

Villalobos, David

From: Sue Mellor <sbsuem@gmail.com>
Sent: Tuesday, May 01, 2018 9:25 AM
To: Villalobos, David
Subject: Protecting ESH

Categories: Purple Category

To Santa Barbara County Planners

I am a long time resident of Santa Barbara County and take pride in its environmental leadership. My hope is that our county will continue to be a beacon to the nation for stewardship of our sensitive habitats.

The draft map of the environmentally sensitive habitats (ESH) shows only vegetation types and should be renamed as a Vegetation Map. The missing types of ESH should be prominently highlighted on the map.

County funds should be allocated to the Long Range Planning Division to map the other types of ESH through the 2019 Work Plan.

Let our County continue to give priority to preserving our natural habitat for future generations.

Yours truly,

Susan Mellor
(County Courthouse Docent for 35 years)

Villalobos, David

From: Paula Schaefer <PSchaefer@sbbg.org>
Sent: Tuesday, May 01, 2018 8:35 AM
To: Villalobos, David
Subject: Environmentally Sensitive Habitats Map for the Eastern Goleta Valley

Categories: Purple Category

Dear County Planning Commission,

I support the draft Environmentally Sensitive Habitats (ESH) Map. However, since it omits several types of ESH and maps only vegetation types, it must be renamed a Vegetation Map. Staff's disclaimer language properly identifies missing types of ESH and should be prominently highlighted on the map. I urge you to recommend that the Board of Supervisors allocate funds to the Long Range Planning Division to map the other types of ESH through the 2019 Work Plan.

Thank you very much.

Sincerely,
Paula Schaefer

Paula Schaefer
Multimedia Coordinator
Santa Barbara Botanic Garden
(805) 682-4726, x121

Villalobos, David

From: Christiane Schlumberger <c.schlumberger@me.com>
Sent: Monday, April 30, 2018 10:05 PM
To: Villalobos, David
Subject: Protecting ESH

Categories: Purple Category

I am writing to urge you to help preserve sensitive habitats in the Eastern Goleta Valley.

- I support the draft ESH Map. However, since it omits several types of ESH and maps only vegetation types, it must be renamed a Vegetation Map.
- Staff's disclaimer language properly identifies missing types of ESH and should be prominently highlighted on the map.
- I urge you to recommend that the Board of Supervisors allocate funds to the Long Range Planning Division to map the other types of ESH through the 2019 Work Plan.

Thank you for helping protect critical sensitive habitat in the Eastern Goleta Valley!

Christiane Schlumberger

Santa Barbara

Villalobos, David

From: karendorfman@cox.net
Sent: Monday, April 30, 2018 9:29 PM
To: Villalobos, David
Subject: Protecting ESH

Categories: Purple Category

- Hi, as a long-time Goleta resident who has watched with dismay as this town has been over-developed and over-paved, I support the draft ESH Map. However, since it omits several types of ESH and maps only vegetation types, it must be renamed a Vegetation Map.
- Staff's disclaimer language properly identifies missing types of ESH and should be prominently highlighted on the map.
- I urge you to recommend that the Board of Supervisors allocate funds to the Long Range Planning Division to map the other types of ESH through the 2019 Work Plan.

Thank you for helping protect critical sensitive habitat in the Eastern Goleta Valley.

Karen Dorfman

(Goleta resident)

Villalobos, David

From: Arthur Kennedy <artkennedy1@cox.net>
Sent: Monday, April 30, 2018 6:28 PM
To: Villalobos, David
Subject: Protecting ESH

Categories: Purple Category

I am to understand that the Staff's disclaimer language properly identifies missing types of ESH and should be prominently highlighted on the map, or the map should be relabeled as an ESH Vegetation Map.

thank you

Arthur Kennedy

Villalobos, David

From: Lindy Carlson <lcswede81@gmail.com>
Sent: Monday, April 30, 2018 6:18 PM
To: Villalobos, David
Subject: Protecting ESH

Categories: Purple Category

- I support the draft ESH Map. However, since it omits several types of ESH and maps only vegetation types, it must be renamed a Vegetation Map.
- Staff's disclaimer language properly identifies missing types of ESH and should be prominently highlighted on the map.
- I urge you to recommend that the Board of Supervisors allocate funds to the Long Range Planning Division to map the other types of ESH through the 2019 Work Plan.

Lindy Carlson
For the Earth, LC

Villalobos, David

From: James Vollaro <jamesvollaro@me.com>
Sent: Monday, April 30, 2018 5:59 PM
To: Villalobos, David
Subject: Protect Environmentally Sensitive Habitats

Categories: Purple Category

Dear County Planning Commission:

I support the draft Environmentally Sensitive Habitats Map, however, several types of Environmentally Sensitive Habitats including native grasslands and habitats for rare plants and animals have been omitted. Please include all known Environmentally Sensitive Habitats on the map.

If these Environmentally Sensitive Habitats are omitted the map should be renamed a Vegetation Map and the missing types of Environmentally Sensitive Habitats should be prominently highlighted on the map.

I also urge you to recommend that the Board of Supervisors allocate funds to the Long Range Planning Division to map the other types of Environmentally Sensitive Habitats through the 2019 Work Plan.

Sincerely,

James Vollaro
549 Lehigh Lane
Buellton, CA 93427

Villalobos, David

From: Will Holmes <will_holmes@cate.org>
Sent: Monday, April 30, 2018 4:47 PM
To: Villalobos, David
Subject: showing support

Categories: Purple Category

Hello -

I am in favor of the protection of sensitive habitat. Please keep this in mind during the May 2 planning commission meeting.

Thank you,

Will

Villalobos, David

From: Ruth Ackerman <dr.ruth1232@gmail.com>
Sent: Monday, April 30, 2018 4:38 PM
To: Villalobos, David
Subject: Protecting ESH

Categories: Purple Category

- I support the draft ESH Map. However, since it omits several types of ESH and maps only vegetation types, it must be renamed a Vegetation Map.
- Staff's disclaimer language properly identifies missing types of ESH and should be prominently highlighted on the map.
- I urge you to recommend that the Board of Supervisors allocate funds to the Long Range Planning Division to map the other types of ESH through the 2019 Work Plan.

Sent from my iPhone

Villalobos, David

From: Dan Silver <dsilverla@me.com>
Sent: Monday, April 30, 2018 4:29 PM
To: Villalobos, David
Subject: Protecting ESH

Categories: Purple Category

Honorable Chair and Members of the Commission:

Endangered Habitats League supports the designation and protection of Environmentally Sensitive Habitats. However, as some habitat types are left out, we recommend that the Board of Supervisors allocate funds to the Long Range Planning Division to map the other types of ESH through the 2019 Work Plan.

Sincerely,
Dan Silver

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
www.ehleague.org

environmental
DEFENSE CENTER

AGENDA ITEMS
ITEM #: 4
MEETING DATE: 5-2-18

April 27, 2018

Chairman Daniel Blough
Santa Barbara County Planning Commission
123 E. Anapamu Street
Santa Barbara, CA 93101

RECEIVED
APR 27 2018
S.B. COUNTY
PLANNING & DEVELOPMENT
PERMIT SUPPORT

Re: Eastern Goleta Valley Community Plan ESH Map Update

Dear Chair Blough and Commissioners:

The Environmental Defense Center ("EDC") submits this letter regarding the Eastern Goleta Valley Community Plan ("EGVCP") Environmentally Sensitive Habitat ("ESH") Map Update Project ("Project") on behalf of the Santa Barbara Urban Creeks Council ("SBUCC"). SBUCC is a non-profit organization working to preserve and restore creeks and watersheds. EDC is a non-profit public-interest environmental law firm which protects and enhances the south-central California environment through education, advocacy, and legal action. As noted in the Staff Report, the Map depicts some but not all rare types of vegetation as ESH and omits other types of ESH as defined in the EGVCP. To avoid potential confusion: (1) the Map should be renamed the EGVCP *Vegetation* Map; (2) Staff's proposed disclaimer should be highlighted; and (3) the Commission should recommend mapping of the omitted ESHs.

I. The Map Should be Renamed the EGVCP Vegetation Map.

The staff report acknowledges that the Map does not include all ESH that are protected in the EGVCP. Therefore, to call the Map an "ESH Map" could mislead landowners and the public. Instead, the Map should be renamed the EGVCP "Vegetation Map" to be completely clear and unambiguous.

The Project scope included mapping known types of rare vegetation alliances generally over 1 acre, but excluded (1) rare vegetation alliances under one acre (except wetlands)[1], (2) previously unknown alliances, (3) finer-level rare vegetation associations[2]; (4) sensitive animal

[1] Aerial Information Systems. *Final Vegetation Mapping Report* at 13 (March 2018).
[2] Julie Evans, California Native Plant Society Vegetation Mapping Director. Email to Brian Trautwein, Analyst/Watershed Program Coordinator (May 11, 2017).

906 Garden St. Santa Barbara, CA 93101
PHONE (805) 963-1622 FAX (805) 962-3152
www.EnvironmentalDefenseCenter.org

species; (5) native grasslands[3]; (6) sensitive native flora[4]; and (6) other known ESHs such as turkey vulture and raptor roosts and nests.[5] Members of the public, scientists, and other agency staff expressed concerns about the limited nature of the mapping effort.

Accordingly, EDC and SBUCC sought to augment the County's mapping efforts. Through close coordination with the County's planning and mapping staff, EDC developed a map of 141 specific locations of rare plant and animal species' habitats. Planning staff stated that these points would be included in the map "if there is readily available, vetted, and mapped information on the location of the species and habitat."[6] Planning staff encouraged EDC to submit its mapped data to the California Department of Fish and Wildlife California Natural Diversity Database ("CNDDB"), so that it would be vetted and could be included on the Map[7] and EDC did this. Unfortunately, however, the 141 ESH locations EDC submitted plus all rare species' habitats in CNDDB have not been mapped, leaving the Map "incomplete" as described by staff at the May 7 public workshop.

Because the Map does not include many types of ESH, the name of the Map should be changed to avoid confusion.

II. The Proposed Disclaimer Should be Highlighted.

We appreciate the Staff's suggestion to include a disclaimer on the Map. We support the proposed language, which references both the missing types of ESH as well as the applicable EGVCP policies. We urge the County to make the disclaimer as prominent as possible so that the public, landowners, and applicants will understand the limitations of the Map and the potential presence of other ESH.

III. The Commission Should Recommend Mapping of the Omitted ESH.

EDC and SBUCC support the Map as a starting point for identifying some ESH areas, but the map omits several ESHs. According to Staff, the County did not have enough funding to map the other ESHs. We urge the Commission to recommend that the Board allocate additional funding to complete the ESH Map and ask Staff to include this project in the 2019 Long Range Planning Work Program.

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[3] May 2, 2018 Planning Commission Staff Report at 5.
[4] *Id.*
[5] Mapping Consultant Aerial Information Systems ("AIS") also identified and mapped high quality old-growth chaparral and, with CDFW, recommended such areas as ESH. This was not included in the draft Map. See e.g., August 4, 2017 email from Debbie Johnson, General Manager, AIS to Julie Harris, P&D.
[6] Email from Dan Klemann, County Long Range Planning Director, to Brian Trautwein, Analyst/Watershed Program Coordinator, EDC (April 24, 2017). Attached.
[7] *Id.*

Thank you for your consideration of these comments.

Sincerely,

Linda Krop
Chief Counsel

Brian Trautwein
Analyst/Watershed Program Coordinator