

13 November 2017

To: Santa Barbara County Board of Supervisors  
Re: Tajiguas Resource Recovery Project

By email to sbcob@co.santa-barbara.ca.us

County Supervisors:

After reviewing the documents associated with the revised Tajiguas Resource Recovery Project (TRRP), involving both new, pioneering actions and wildlands disturbances and new, on-site disturbances (Final EIR 2015, AECOM Biological section of FSEIR 2013, Addendum to FEIR 2017) I am concerned and confident that significant impacts to the listed California Red-Legged Frog (CRLF), and potentially other species of concern, could result from the proposed action, and such possibility warrants new CRLF surveys and a new environmental analysis.

Specifically, new biological data regarding the CRLF is needed to adequately assess the level of impacts of the TRRP on the CRLF, including but not necessarily limited to:

- Regional meta-population and individual population boundary delineation,
- Individual population viability analysis (including clearly defined inter- and intra-seasonal migration patterns).
- Breeding and non-breeding season surveys for at least 5 years to determine actual population stability and migration/emigration patterns that could be affected by additional changes to the Tajiguas landfill. To date, the mitigation measures are based on inadequate surveys and minimal, fragmented data.
- Revisions and expansion of mitigation measures to address the increased population sizes in recent years. There was clearly a failure of translocation effort, and this failure has not been incorporated into mitigation measure methods—new mitigation methods need to be tested, researched, outlined and included in an expanded environmental review.
- Re-evaluate assumptions of a small CRLF frog population on-site due to limited surveys incorporating the new, larger populations size of 21 seen in last three wet season surveys. This increase in population size amplifies the potential for severe, and at least significant, impacts to the CRLF population and its habitat, from the TRRP.
- Assess the potentially significant impacts to the use of lights that will directly illuminate a portion of the habitat of the nocturnally active, CRLF.
- Evaluate how placement of the Anaerobic Digester location would directly and indirectly impact STB-6, critical habitat for the CRLF. Other inadequacies withstanding, this alone would constitute a potentially significant impact on such a small population that has been constrained by past and proposed landfill activities.

To summarize, there are multiple reasons why additional environmental review and analysis are needed regarding the TRRP, including inadequate surveys, lack of incorporation of new CRLF population data, lack of assessment of impacts of nighttime lights on site, and inadequate mitigation measures based on limited data. Furthermore, it is my opinion that relocation of the anaerobic digester facility alone constitutes a substantial adverse effect on the habitat of the CRLF.

Best regards,

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