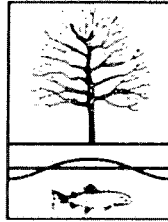




SANTA BARBARA
URBAN CREEKS COUNCIL



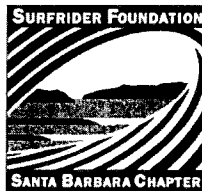
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CFA Citizens Planning
Association
of Santa Barbara County



CALIFORNIA
NATIVE PLANT SOCIETY



June 29, 2018

Das Williams, Chair
Santa Barbara County Board of Supervisors
105 East Anapamu Street
Santa Barbara, CA 93101
EMAIL: sbcob@co.santa-barbara.ca.us

Re: **Eastern Goleta Valley Community Plan ESH Map Update**

Dear Chair Williams and Supervisors:

The undersigned organizations urge you to approve the Eastern Goleta Valley Community Plan (“EGVCP”) Environmentally Sensitive Habitat (“ESH”) Map Update. Updating the map is required pursuant to EGVCP Action ECO-EGV-5A¹ and Program ECO-

¹ Action ECO-EGV 5A requires the County to update the ESH Map “to reflect the *current extent of known biological resources/habitat areas.*” (*Emphasis added.*)

EGV-5C.² Updating the ESH Map will ensure that landowners, the public, and planners are all working with the same, current information about the locations of ESH in Eastern Goleta Valley. We recommend that (1) specific, rare species habitat areas mapped in the California Department of Fish and Wildlife (“CDFW”) Natural Diversity Database (“NDDB”) be added to the ESH Map, (2) that the Board then adopt the Map as part of the EGVCP, and (3) that in the future the Map be updated to include other types of ESH.

The EGVCP defines ESH, in part, as areas which support “rare or vulnerable native vegetation alliances and/or *sensitive native plant and/or animal species.*” (Policy ECO-EGV-5.4; *emphasis added.*) The draft ESH Map identifies rare vegetation alliances as ESH *but omits the locations of “sensitive native plant and/or animal species.”* The Map is incomplete in this regard. The Lead Scientist at the CDFW NDDB submitted the June 15 letter to the Board of Supervisors *authorizing the County to include the rare species locations on the ESH Map* for the purposes of conservation.³ Please direct staff to add this information.

Other types of ESH protected by Policy ECO-EGV-5.4, including rare upland vegetation alliances under one acre, and rare wetland vegetation alliances under .25 acres,⁴ “Raptor/turkey vulture roosts,” “Critical wildlife habitats,” and “Wildlife corridors”⁵ were also omitted and should be added to the ESH Map as resources allow.

Our groups have observed continued clearing of unmapped ESH. We believe this is in part an inadvertent result of the current 1993 ESH Map’s exclusion of many ESHs. By updating the ESH Map as required to better identify ESH, including CDFW’s rare species data, the County’s natural resources and watersheds can be better protected pursuant to the County’s existing ESH Ordinance. Furthermore, updating the public ESH Map so that it does not omit certain ESHs will ensure that the public, landowners, and planners all have the same information.

In closing, please (1) direct staff to add the information from CDFW onto the ESH Map, (2) then adopt the ESH Map, and (3) add other types of ESHs listed in Policy ECO-EGV-5.4 to the ESH Map as County resources allow.

Thank you for your attention to our comments.

Sincerely,

Linda Krop, Chief Counsel
Environmental Defense Center

² Program ECO-EGV-5C requires the County to “incorporate any and all new data” on the ESH/RC Overlay Map.

³ Misty Nelson, Lead Scientist, CDFW letter to Santa Barbara County Board of Supervisors authorizing the County to map the CDFW’s rare species’ locations as ESH on the ESH Map as long as the species’ names are withheld from the ESH Map to avoid the potential for people using the Map to collect or harm rare species. June 15, 2018.

⁴ John Menke, Deborah Johnson, and Anne Hepburn, Aerial Information Systems, *Vegetation Mapping – Eastern Goleta Valley Community Plan Area, Final Vegetation Mapping Report*. March 2018. At page 13.

⁵ EGVCP Policy ECO-EGV-5.4

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