

# LAW OFFICE OF MARC CHYTILO

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ENVIRONMENTAL LAW

February 20, 2012

Santa Barbara County Board of Supervisors  
105 E. Anapamu Street, Suite 407  
Santa Barbara, CA 93101

By email to [sbcob@co.santa-barbara.ca.us](mailto:sbcob@co.santa-barbara.ca.us)

*Dear Chair Farr and Honorable Members of the Board of Supervisors,*

This office represents the San Marcos Foothills Coalition, a community organization dedicated to preserving the unique resources present on the San Marcos Foothills Preserve property. The draft Goleta Valley Community Plan endeavors to refine the Environmentally Sensitive Habitat (ESH) Overlay to apply accurately to existing habitat resources, and expands the overlay coverage to the San Marcos Foothills portion of the planning area. Draft Policy ECO-EGV-5.2 identifies the general criteria utilized to determine which resources in the Eastern Goleta Valley are identified as ESH, and Policy ECO-EGV-5.4 identifies specific biological resources that *shall* be considered environmentally sensitive and designated on the ESH/Riparian Corridor Map.

After receiving input from the community including the Environmental Defense Center and Santa Barbara Urban Creeks Council, the Planning Commission directed the revision of Action ECO-EGV-5A in the Compendium Initiation Draft Goleta Valley Community Plan to provide for the potential addition of biological resources and habitats in Policy ECO-EGV-5.4 including chaparral habitat areas. We support the modified language of Action ECO-EVG-5A, but request that this Action identify other habitat types in addition to chaparral. Specifically, request that the Board direct the revision of this Action to include the following underlined text:

Action ECO-EGV-5A: The Land Use and Development Code and maps of ESH/RC overlay areas shall be studied and updated to reflect the current extent of known biological resources/habitat areas, with consideration of potential additional biological resources and habitats meeting the criteria of Policy ECO-EGV-1.1, including, but not limited to chaparral habitat areas, raptor/White-Tailed Kite foraging areas, Burrowing Owl wintering sites, and Grasshopper Sparrow nesting sites. If additional biological resources and/or habitat areas are ] identified, Policy ECO-EGV-5.4 shall be modified to include the updated resources list.

Specifically referencing these additional habitats in the draft policy will ensure that they are studied and reflected in updated maps. Additionally to ensure consistency and accuracy in the identification of native grasslands, we request that ECO-EGV-5.4 clarify that "Native Grasslands" are defined as "an area where native grassland species comprise 10 percent or more of the total relative cover" consistent with the County's Environmental Thresholds and Guidelines Manual (p. 31).

Sincerely,



Marc Chytilo

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