



CALIFORNIA
NATIVE PLANT SOCIETY

June 27, 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 the Santa Barbara County Supervisors,

Thank you very much for the opportunity to provide comments on the Eastern Goleta Valley Community Plan (“EGVCP”) Environmentally Sensitive Habitat (“ESH”) Map Update. We support the County’s current efforts, as they are a significant improvement from the 1993 ESH map. The current draft increases the mapped acreage of ESHs by 12% (a total of 236 acres), a portion of which constitute chaparral habitats.

The California Native Plant Society (“CNPS”) is a non-profit environmental organization with nearly 10,000 members in 35 local chapters. CNPS’ mission is to protect California’s native plant heritage and to preserve it for future generations through the 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.

The portion of California that experiences a Mediterranean climate regime, including all of Santa Barbara County, has been recognized as a Global Biodiversity Hotspot called the California Floristic Province (CA-FP)¹. Hotspots are identified as places where high biodiversity and many endemic species occur in concert with high threat level. Within the CA-FP, chaparral habitats feature prominently as reservoirs of biodiversity and living laboratories of evolution in action. The vast majority of the diversity of certain emblematic groups of plants, for example manzanitas (*Arctostaphylos* spp.) and wild lilacs (*Ceanothus* spp.), is contained in the chaparral habitats of the CA-FP. Chaparral is also home to many rare species, some of which are threatened by human actions, and are at risk of extinction. Increasingly, landowners in Santa Barbara County seek to clear these habitats on their properties. We continue to support provisions in the EGVCP that exempts defensible space around homes as a provision that balances environmental protection with public safety needs. Designating chaparral habitats as ESHs increases the level of protection for this very special ecosystem. With this in mind we provide the following comments on the Draft EGVCP ESH Map:

¹ Draft EGVCP ESH Ma

1. We urge the Board of Supervisors to approve the Draft EGVCP ESH Map, given that it increases the number of acres of habitat designated as ESH.

2. We continue to support the mapping of ESHs in Policy ECO-EGV-5.4. We also recommend that the County maps environmentally sensitive habitats as ESHs. These habitats include, but are not limited to vegetation alliances and associations identified as “sensitive natural communities” by the California Department of Fish and Wildlife (including upland stands less than one acre in extent)², wetland habitats (including rare vegetation alliances areas under one-quarter acre in extent), habitats containing plants identified as locally rare in Santa Barbara County³, and habitats containing plants on Rank 4 in the CNPS Inventory of Rare, Threatened, or Endangered Plants⁴.

3. This effort to identify and map ESHs can be greatly improved by incorporating the spatially-specific data included in the most-recent GIS layer in the California Department of Fish and Wildlife’s California Natural Diversity Database (CNDDDB)⁵. The CNDDDB tracks occurrences of rare plants, animals, and habitats statewide in a continuously updated database with associated maps. Any mapping of ESHs in the Eastern Goleta Valley should be considered incomplete without incorporating these data.

Once again, thank you very much for the opportunity to comment on the Draft EGVCP ESH Map. Please feel free to contact me with any questions.

Sincerely,



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² <https://www.wildlife.ca.gov/data/vegcamp/natural-communities>

³ https://www.sbbg.org/sites/default/files/pdfs/rare_list_santabarbara.pdf

⁴ <http://www.rareplants.cnps.org/result.html?adv=t&cnps=4&ccl=SBA>

⁵ <https://www.wildlife.ca.gov/data/cnddb/maps-and-data>