Attachment 11: Storrer Environmental Services Peer Review

STORRER
ENVIRONMENTAL
SERVICES

2565 Puesta Del Sol Road #3
Santa Barbara, CA 93105
(805) 682-2065
storrer.john@verizon.net

To: Nicole Lieu, SBCo P&D Development Review Division

From: Jessica Peak, Consulting Biologist

Date: May 31, 2015

Re: Review of "Dos Pueblos Creek Restoration, Maintenance and Monitoring Plan"

Per your request, I reviewed the referenced Restoration, Maintenance and Monitoring Plan (Plan) (April 2015) prepared by Dudek on behalf of the California Rangeland Trust (CRT) in collaboration with Standard Portfolios Asset Management Co., LLC (Developer), who currently owns the Santa Barbara Ranch property. The Plan was submitted as a component of the "Inland Development Agreement (IDA) tied to the entitlement of the Santa Barbara Ranch (SBR) Project, including portions of Dos Pueblos Ranch (DPR), which received approval from the County of Santa Barbara (County) on October 21, 2008.

Please consider the following comments:

The Plan outlines on-site "riparian restoration and enhancement activities" in disturbed portions of Dos Pueblos Creek ("Restoration Areas") as part of the Dos Pueblos Creek Restoration Project (Project). The Project area is depicted in Figures 2 and 4. Restoration Areas are located along an approximate 3-mile stretch of Dos Pueblos Creek in locations with "previous creek disturbances and built improvements". The Plan is intended to focus on areas of past disturbance, not the entire creek reach.

Responsible parties and funding sources for the Project are described in Section 1.4. In accordance with the IDA, the Project will be initially funded by the Developer and implemented, maintained, and monitored by a non-profit conservation organization (CRT). Project goals and the development agreement are outlined in Section 2.2.1.

Methods for development of the Plan included a review of past surveys of the Project area and current field reconnaissance surveys. Areas of past creek disturbance and man-made obstructions were identified by Impact Sciences in 2010 during an assessment of the overall condition of the Dos Pueblos Creek drainage. The Plan utilized and expanded on the information gathered by Impact Sciences. Dudek and Balance Hydrologics staff conducted site visits of the Project area and collected additional data on March 10 and 11, 2015.

Restoration and enhancement activities will include the following: removal of barriers to fish passage; installation of structures more conducive to fish passage; removal of sediment; installation of bio-retention facilities for sediment capture; removal of non-native vegetation;

planting of native riparian vegetation; modifications to, or elimination of farm access road ("Arizona") creek crossings; modifications to the Caltrans Hwy 101 bridge drop structure; and modifications to the agricultural water diversion structure upstream of the Restoration Areas. Project objectives and restoration opportunities are summarized in Section 2.2.2.

Each of the 12 proposed Restoration Areas (i.e., Restoration Areas A through L) are thoroughly described in Section 2.3.1 (Areas South of Hwy 101 – Dos Pueblos Ranch Property) and Section 2.3.2 (Areas North of Hwy 101 – Schulte Property). Restoration Areas are depicted on vegetation maps (Figures 5a-5i) and Restoration Area maps (Figures 6a-6l). The Restoration Area maps provide details on exactly where restoration activities are proposed and what activities will be performed at each location. Photographs of each Restoration Area are also provided (Figures 7A-7L).

A detailed report of Hydrology and Aquatic Resource Data collected by Balanced Hydrologics is provided in Appendix B. The geomorphology data and estimated profile of the stream are summarized in Sections 2.4.3 and 2.4.4. The stream profile is broken down into three reaches and the geomorphology and aquatic habitat conditions of each reach are described in detail.

An evaluation of presence or potential for occurrence of special status biotic communities and plant and wildlife species is included in the Plan. Special-status species evaluations are based on data provided in the Santa Barbara Ranch Final Environmental Impact Report (FEIR) (URS 2008). Descriptions and classifications of plant communities and species conform to accepted sources and nomenclature (e.g. Sawyer et al. 2009; Baldwin et al. 2012) and vegetation maps of the Project area are included (see Figures 5a-5i). A list of vascular plant species observed within the Project area is included as Appendix A.

Section 3.0 (Regulatory Framework and Jurisdictional Areas) gives a thorough discussion of applicable federal, state, and local (County) land use policies, regulations, and permit requirements. Aformal wetland delineation was not completed as part of the initial field reconnaissance performed by Dudek. Based on the results of the initial site reconnaissance and vegetation mapping Dudek concluded that the Project area likely supports wetlands and waters under the jurisdiction of federal, state, and local regulatory agencies. The Plan calls for a jurisdictional wetland delineation to be conducted at each of the Restoration Area locations, "in order to determine the full extent of waters of the U.S., including wetlands, under ACOE, CDFW, RWQCB, and CCC jurisdiction".

Temporary disturbance to the riparian corridor related to stream restoration work and potential permanent impacts resulting from modifications to existing structures, may occur within Restoration Areas. "Impacts associated with the Project are limited to the modification and/or removal of the previous built obstructions and modified grading required to reconfigure the creek where proposed and to restore natural geomorphic conditions where possible." The Plan states that the total temporary and permanent impacts will be determined once detailed construction plans are prepared. Because the goal of the Project is to "improve aquatic resource functions and services of the creek, no compensatory mitigation is proposed or required for these impacts, as the project is self-mitigating".

The Implementation Program and Work Plan (Section 5.0) provides a comprehensive overview of the restoration implementation strategy. The Implementation Program includes a preliminary

schedule (Table 3), detailed protection measures for existing resources in proximity to the Restoration Areas, including water quality protection, aquatic resource protection, sensitive species protection, and cultural resource protection. Site preparation (e.g., topsoil salvage, initial exotic species removal, temporary irrigation system, and erosion control Best Management Practices), plant installation, and seed application methods are also thoroughly described.

Restoration planting design (Section 5.5) includes container plant installation and native seed application for specific vegetation communities. The recommended planting palettes for each plant community are appropriate for the region and Project area with the exception of two species listed in the Riparian Woodland Vegetation Communities (Table 4). I recommend that San Diego sagewort (*Artemisia palmeri*) and San Diego marsh alder (*Iva hayesiana*) be removed from this planting palette, as these species do not occur in Santa Barbara County.

Section 6.0 (Long-term Five-year Maintenance Program) provides detailed guidelines for weed removal techniques (e.g., hand removal, mechanical removal, and chemical treatments), irrigation requirements, and remedial planting and seeding efforts. Table 9 provides a list of priority non-native exotic species to be controlled within the Restoration Areas, and techniques for removal. One native species, cocklebur (*Xanthium strumarium*), is listed in Table 9 as a non-native exotic. I recommend removal of cocklebur from the target exotic species list, as it is native to California and the Project region.

General site requirements, performance standards for each vegetation community, monitoring methods (e.g., California Rapid Assessment Method (CRAM), qualitative monitoring, and quantitative data collection), and annual reporting requirements are appropriate and thoroughly described in Section 7.0. Contingency measures, adaptive management strategies, and descriptions of long-term site maintenance, management, and site protection are also adequate and complete.

In summary, the Plan is comprehensive, provides thorough descriptions of restoration objectives, and is a feasible approach to restore habitat value and hydrologic functions to the Dos Pueblos Creek drainage. The implementation program is appropriate, performance standards are attainable, and long-term maintenance, monitoring, and reporting objectives are described.

Please call me if you have any questions concerning my comments.

Best regards,

Jessica Peak
Storrer Environmental Services, LLC

References

Baldwin, B. G., D. H. Goldman, D. J. Keil, R. Patterson, T. J. Rosatti, and D. H. Wilken, editors. 2012. *The Jepson Manual: Vascular Plants of California, Second Edition*, Revised. University of California Press, Berkeley and Los Angeles.

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. *A Manual of California Vegetation, Second Edition*. California Native Plant Society, Sacramento.

URS Corporation (URS). 2008. Proposed Final Environmental Impact Report, Santa Barbara Ranch Project. SCH# 2005011049.