March 17, 2000

Ventura County Planning Division
Attn: Becky Linder
800 South Victoria Avenue, L# 1740
Ventura, CA 93009

Re: **Yellow Hill Road, Santa Monica Mountains**

Subject: **Biology Review**

Dear Becky:

ENSR would like to update you on the status of the Biology Review for the property on Yellow Hill Road in the Santa Monica Mountains. After consultation with the appropriate parties we have identified some concerns which are discussed below.

As you know, the project applicant, Mrs. Barbara Rotter, has already graded 2.8 acres of Coastal Sage Scrub habitat in anticipation of the development of stables, barn, etc. As noted by Dr. Barbara Collins, ENSR field biologist, this grading has resulted in a complete removal of plants and an inability for us to determine with certainty which species had been present.

The key issue of concern is the regional and local loss of the Coastal Sage Scrub habitat. According to Diana Hixon of the California Department of Fish and Game (CDFG), 90 percent of Coastal Sage Scrub habitat has been removed by coastal development. Ms. Mary Meyer, Regional Botanist for the CDFG reported that the Ventura County Coastal Sage Scrub is state ranked with the California Natural Diversity Database (CNDDB) as very threatened. Under the California Environmental Quality Act a project will normally have a significant effect on the environment if it will substantially diminish habitat for fish, wildlife, or plants. Thus, we recommend that the County consider the removal of Coastal Sage Scrub habitat cumulatively significant when viewed in connection with other losses. Based on this determination we also recommend that the County propose a 2:1 re-vegetation effort, preferably onsite, to mitigate environmental impacts imposed on the subject area.

Dr. Collins noted in her review of the project that, *Calochortus plummerae* (a federal species of special concern) and *Pentachaeta lyonii* (state and federally listed as endangered) had the potential to have occurred on the site. However the grading of the site has eliminated the potential either for us to determine if it had been at the site, or for it to reestablish itself at the site.

A correlated issue is the impact to animals that can no longer use the Coastal Sage Scrub habitat. Mr. Mark de la Garza, ENSR contract biologist, noted that the federally threatened California

Coastal Gnatcatcher is a common resident of Coastal Sage Scrub habitat, and individuals living in the subject area would have suffered habitat loss due to Mrs. Rotter's action. Mr. Rick Ferris from the Ventura office of the U.S. Fish and Wildlife Service (USFWS) indicated that there have not been any Gnatcatchers reported in the subject area and therefore it is unlikely that Gnatcatchers would have been affected.

A number of special status species use Coastal Sage Scrub habitat and might have occurred in the subject area and suffered habitat loss. In order to compile an accurate listing of federally protected species ENSR has submitted a request to the USFWS for all listed, proposed, and candidate species that potentially occur in the area. We will include this list as supplemental information to the Biology Review.

Thus, in the absence of direct impacts to state or federally protected species, we recommend mitigation be imposed for the current disturbance of the 2.8 acres of Coastal Sage Scrub habitat.

Sincerely,

Bryan E. Bowe
Environmental Consultant

SECTION B
INITIAL STUDY CHECKLIST

Job: CUP - 5067 **Requester:** Keith Turner

Applicant: Barbara/Alvin Rotter **Date:** January 16, 2000

Survey Type: Field **Rationale:** Grading, proposed structures

Site Description: A field visit of the project site (Parcel no. 700-0-170-280)) was conducted on January 15, 2000. The parcel is located on 10502 Yellow Hill Rd, Malibu, in the Santa Monica Mts. east of Yerba Buena Road. The topography of the parcel is quite hilly and at one time was vegetated with coastal sage scrub. At present it is almost completely graded with only a few remnants of the initial vegetation visible. A cluster of about 12 to 14 coast live oaks (*Quercus agrifolia*) are present just south of the road, in the northwestern portion of the property, but all land surrounding the trees is completely graded. On the top of hill, above the horse arena area is a ring of Eucalyptus and pine trees. A few remnants of deerweed (*Lotus scoparius*), wild buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*) and purple sage (*Salvia leucophylla*) are also present.

	Project Impact Degree of Effect*				**Cumulative Impact Degree of Effect***			
	N	**LS**	**PS-M**	**PS**	**N**	**LS**	**PS-M**	**PS**
6. Biological Resources								
a. endangered, threatened or rare species			X					X
b. wetland habitat	X				X			
c. coastal habitat	X				X			
d. migration corridors	X				X			
e. Locally important species/communities			X					X

*N No impact
LS Less than significant
PS-M Potentially significant, unless mitigated to a level of insignificance
PS Potentially significant, even after mitigation

SECTION C
DISCUSSION OF RESPONSES

a. Coastal Sage Scrub habitat is state ranked with the California Natural Diversity Database (CNDDB) as very threatened. Grading of the property has already occurred, and has destroyed more than 2 acres of coastal sage scrub habitat. Without appropriate mitigation, the project will have a potentially significant impact.

Calochortus plummerae, a federal species of special concern, has been observed in coastal scrub north of highway 1, about 3 miles from the project site. It would be impossible to say for certain whether this plant was present on the property before the grading occurred. The chance of it coming up now after the grading would be extremely unlikely, and any future grading would have no impact on the plant.

Eriogonum crocatum, Conejo buckwheat, has been observed in the vicinity of Lake Sherwood on rocky outcrops above the lake. Conejo buckwheat only grows amidst such rocky outcrops and no such habitat was observed at the project site.

Dudleya cymosa ssp. *marcescens*, "marcescent dudleya", has been observed within 2 miles of the project site in Little Sycamore Canyon at the junction of Yerba Buena Rd. and Cotharin Road. The location is a north facing rock outcrop with moss, lichens and associated with *Lilium humboldtii* and *Pholistoma racemosum*. Marcescent dudleya is federally listed as threatened. It would not be expected on the project site, however, because there was no suitable habitat for its survival. Marcescent dudleya requires a rocky outcrop.

Another threatened species of dudleya, *Dudleya cymosa* ssp. *ovatifolia*, (Santa Monica Mountains dudleya) has also been found within 5 miles of the project site. Like marcescent dudleya, it would not be expected to occur in the project site because it also requires a rocky outcrop and none was present.

About 5 miles from the project site, *Hemizonia minthornii*, Santa Susana tarplant, has been observed at Charmlee County Park. Santa Susana tarplant is usually found adjacent to sandstone rock outcrops. No evidence of Santa Susana tarplant was observed on the property and its presence is highly unlikely because no sandstone outcroppings were observed.

Braunton's milkvetch, *Astragalus brauntonii*, is a short-lived perennial, listed as endangered by the U.S. Fish and Wildlife Service. It is found in chaparral or coastal sage scrub, often in brushy places, and seems to favor limestone-based soils. It is possible that fire promotes germination. Although Braunton's milkvetch could occur at the project site, it is unlikely. Previous sightings have been in openings in chaparral, just below ridgelines or, as in Thousand Oaks, in an oak woodland, near a temporary stream. Habitat at the project site is likely not favorable for the growth of the milkvetch.

Lyon's pentachaeta, *Pentachaeta lyonii*, is state and federal listed as endangered. It has been reported within 5 miles of the project site. Lyon's pentachaeta occurs in chaparral or coastal sage scrub, usually in clearings or exposed areas on compact clay soil. It is often associated

with goldfields (Lasthenia chrysostoma) and grasses. Because much of the vegetation in the project area has been removed, it is not possible to tell whether Lyon's pentachaeta was there before the disturbance. Once the ground is bulldozed or seriously disturbed, Lyon's pentachaeta will not come back.

Leo Carillo State Beach, just north of Highway 1, and the junction of Highway 1 with Yerba Buena Road are known habitats for the monarch butterfly, *Danaus plexippus*. The monarchs seem to prefer roosting on Eucalyptus trees along the coast. Although there were a few Eucalyptus trees on the property, monarchs would not be expected to use this site. The monarchs require a source of water and nectar nearby, and a habitat in the mountains this far from the coast and a water source would be unlikely. In addition, the monarchs come back to the same trees year after year, and no sighting of the monarchs has occurred other than the areas indicated. Grading at the project site would have no effect on the survival of the monarchs.

Although there are several coast live oaks, *Quercus agrifolia*, on the property, it would in no way be considered a coast live oak riparian forest. A southern coast live oak riparian forest would be located in a canyon and would be a closed canopy woodland dominated by *Quercus agrifolia* with associated *Platanus racemosa*.

b. The parcel does not contain a wetland habitat, so there should be no destruction of a wetland habitat.

c. The project site is not located in the vicinity of the coast, so no adverse impact would be expected.

d. Wildlife movement would not be likely to occur on the property, because the parcel has been almost completely graded or cleared of vegetation. It is extremely unlikely that the animals would use this area for a migration route. Proposed structures will be built in already graded areas and should have no impact on the wildlife or plant species. Houses are present on the southeastern and eastern border of the property and construction is presently occurring west of the property.

e. A small grove of coast live oak trees is present on the northwest segment of the property. However, no plans are in place to remove or disturb the trees. Grading has already occurred on the slope above the trees and most of the proposed development will not be near the trees. Therefore, no expected impact should occur. However, we feel that it is important that during the grading and building process, care is taken to prevent any harm to the oaks. This is particularly true for the construction of the leach field, with a proposed location about 50 feet south of the closest tree. It is important that the oaks are protected with at least a 5 foot clearance from the dripline.

SECTION D
MANTATORY FINDINGS OF SIGNIFICANCE

Based on the information contained within Sections B and C:	YES/MAYBE	NO
1 Does the project have the potential to significantly degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	X	
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one which occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).		X
3. Does the project have impacts which are individually limited, but cumulatively considerable? (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant).	X	
4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X

SECTION E
DETERMINATION OF ENVIRONMENTAL DOCUMENT

On the basis of this initial evaluation:

I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION should be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measure(s) described below will be applied to the project. A MITIGATED NEGATIVE DECLARATION should be prepared.

I find the proposed project, individually and/or cumulatively MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.

Mitigation Measures

We recommend that the County consider the removal of Coastal Sage Scrub habitat cumulatively significant when viewed in connection with other losses. Based on this determination we also recommend that the County propose a 2:1 re-vegetation effort, preferably onsite, to mitigate environmental impacts imposed on the subject area.

During the grading and construction process, care must be taken to avoid any disturbance of the coast live oak trees located in the northwest segment of the property. This is particularly true for the construction of the leach field, with a proposed location about 50 feet south of the closest tree. It is important that the oak trees are protected with at least a 5 foot clearance from the dripline.

Signature of Preparer

Apr 21, 2000
Date

LISTED AND PROPOSED SPECIES THAT MAY OCCUR IN THE TRIUNFO PASS AREA OF THE SANTA MONICA MOUNTAINS LOS ANGELES COUNTY, CALIFORNIA

Plants

Braunton's milk-vetch	*Astragalus brauntonii*	E
Lyon's pentachaeta	*Pentachaeta lyonii*	E
Santa Monica Mountains live-forever	*Dudleya cymosa* ssp. *ovatifolia*	T
Marcescent dudleya	*Dudleya cymosa* ssp. *marcescens*	T

Key:

E - Endangered T - Threatened CH - Critical habitat

C - Candidate species for which the Fish and Wildlife Service has on file sufficient information on the biological vulnerability and threats to support proposals to list as endangered or threatened.