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September 14, 2022 13914

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Subject: **Draft Aquatic Resources Delineation for the 101 Garden Street Project in the City of Santa Barbara, California**

Dear Mr. Gilbert and Ms. Mauceri:

This letter report (report) summarizes the methods and results of a formal aquatic resources delineation completed for the 101 Garden Street Project (Project) located in the City of Santa Barbara. The aquatic resources delineation focused on the previously identified ditch feature described in the previous biological studies (SAIC 2007 and Dudek 2018). Additionally, Dudek conducted field surveys of the entire Project site for aquatic features that could be considered jurisdictional to the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), the California Coastal Commission (CCC), and the City of Santa Barbara under their Local Coastal Program (City 2019). An initial field survey was conducted in January 2019, and a follow-up survey was conducted in March 2022, to verify and update the findings of the 2019 survey.

1 Introduction

1.1 Project Location and Survey Area

The Project is located at 101 Garden Street in the City of Santa Barbara (City), California, and encompasses Assessor's Parcel Numbers (APN) 017-630-018, 017-630-008, 017-630-027, 017-630-024, 017-630-009, and 017-630-021. The site is bordered by Garden Street to the north and east, by Yanonali Street and Santa Barbara Street to the west, and the Union Pacific Railroad right-of-way to the south (Attachment A, Figure 1). The aquatic resources delineation study area (study area) includes the APNs identified above. Connectivity with adjacent jurisdictional waterways was assessed during the wetland delineation based on publicly available resources including aerial photography and City of Santa Barbara Laguna Watershed Study (City 2013).

1.2 Project Description

The proposed project consists of the construction of a new 250-room hotel, parking, and onsite amenities. There would be 130 extended stay rooms and 120 lifestyle rooms for guests. Parking onsite will be available in an underground 233-space structure and an additional 33 spaces at-grade (total 266 spaces). The total building square footage will be approximately 261,139 sf gross/235,690 sf net. Grading in the amount of 25,500 cubic yard (CY) cut, 0 CY fill and export of 25,500 CY (takes into account losses due to clearing, grubbing and shrinkage) would be required for site improvements. Five existing structures totaling 15,300 sf will be demolished. The

entitlements requested from the City include approval by the Historic Landmarks Commission and Planning Commission for a Coastal Development Permit, Development Plan, Parking Modification, and subsequent Public Works and Building Permits.

Vehicular access into the property will be provided by two separate points. The primary guest entrance will be located on Garden Street and will lead to a central motor court and lobby areas. One secondary entrance will be located off Santa Barbara Street and Yanonali Street. To comply with City standards, driveways will be at least 20-feet wide, paved, and capable of supporting standard fire apparatus. The proposed Garden Street entrance is angled and positioned in such a way to accommodate the alignment of Garden St, as advised by City transportation staff. The proposed project also includes pervious pavers adjacent to the Garden Street entrance, to enable pedestrian access. These modifications will result in minimal encroachment within an existing storm drain ditch, the "Garden Street Drain," considered to include a coastal wetland that is an environmentally sensitive habitat area (ESHA), in accordance with the City of Santa Barbara (City) Local Coastal Program (LCP; City 2019). The proposed project also includes enhancement and habitat restoration within the Garden Street Drain, including installation of native vegetation throughout, as required by LCP policies and in accordance with comments provided by the City's Land Development Team.

1.3 Hydrologic Unit and Watershed

The Project site is located within the South Coast Hydrologic Unit, specifically the Santa Barbara Hydrologic Area (315.32), as defined in the Water Quality Control Plan for the Central Coastal Basin (Basin Plan) (RWQCB 2019). City Creeks Division defines the Project site as located within the Laguna Watershed (City 2013).

2 Regulatory Setting

This section provides a summary of the federal and state regulatory framework pertinent to the aquatic features located in the study area. This section identifies and discusses the various federal and state policies and programs defining jurisdictional wetlands and waters as well as the regulatory requirements associated with these jurisdictional features.

2.1 U.S. Army Corps of Engineers

The USACE Regulatory Program regulates the discharge of dredge or fill material within wetland and other waters of the U.S., under Section 404 of the Clean Water Act (CWA). In light of the U.S. District Court for the District of Arizona's order on August 30, 2021, vacating the Navigable Waters Protection Rule, the Environmental Protection Agency (EPA) and USACE "have halted implementation of the rule and are interpreting "Waters of the U.S." consistent with pre-2015 regulatory regime" (EPA 2021). Therefore, "Waters of the U.S." include:

- Traditional navigable waterways (TNWs), interstate waters, and territorial seas
    - Also including wetlands "adjacent" to these features. Adjacent is defined as bordering, contiguous, or neighboring
- Certain lakes, ponds, and impoundments of Waters of the U.S.

- Tributaries of TNWs, impoundments, interstate waters and territorial seas
    - Tributaries need to meet the Relatively Permanent Standard **or** the Significant Nexus Standard
- Wetlands adjacent to impoundments and tributaries
    - Adjacent wetlands need to meet the Relatively Permanent Standard **or** the Significant Nexus Standard
- "Other Waters" that meet the Relatively Permanent Standard or Significant Nexus Standard

The Relatively Permanent Standard includes those waters that are relatively permanent, standing or continuously flowing, and waters with a continuous surface connection to such waters. A Relatively Permanent feature typically flows year-round or has continuous flow at least seasonally. Seasonal flow is generally defined as three months (as defined in USACE Approved Jurisdictional Determination forms).

Significant Nexus Standard applies to waters that either alone or in combination with similarly situated waters in the region, significantly affect the chemical, physical, or biological integrity of traditional navigable waters, interstate waters, or the territorial seas. For a non-navigable, non-Relatively Permanent Water reach to be jurisdictional under the CWA, the physical, biological, and chemical functions must show more than a speculative or insubstantial effect on a downstream TNW. The primary focus of a Significant Nexus determination is stream and wetland functions and the role those functions have in maintaining the health of downstream navigable waters.

The discharge of dredge or fill material into wetland and non-wetland Waters of the U.S. requires authorization from the USACE prior to impacts.

2.2 Regional Water Quality Control Board

The State Water Resources Control Board has authority over wetlands through Section 401 of the CWA, as well as the Porter–Cologne Act, California Code of Regulations Section 3831(k), and California Wetlands Conservation Policy. The CWA requires that an applicant for a Section 404 permit (to discharge dredge or fill material into Waters of the U.S.) first obtain certification from the appropriate state agency stating that the fill is consistent with the state's water quality standards and criteria. In California, the authority to either grant certification or waive the requirement for permits is delegated by the State Water Resources Control Board to the nine regional boards. The Central Coast RWQCB has authority for Section 401 compliance in the Project area. A request for certification is submitted to the RWQCB at the same time that an application is filed with the USACE.

The Porter–Cologne Water Quality Control Act established the State Water Resources Control Board and each RWQCB as the principal state agencies responsible for the protection of water quality in California. The Porter–Cologne Water Quality Control Act provides that "All discharges of waste into the waters of the State are privileges, not rights." Waters of the State are defined in Section 13050(e) of the Porter–Cologne Water Quality Control Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." All dischargers are subject to regulation under the Porter–Cologne Water Quality Control Act, including both point and nonpoint source dischargers. The Central Coast RWQCB has the authority to implement water quality protection standards through the issuance of permits for discharges to waters at locations within its jurisdiction.

2.3 California Department of Fish and Wildlife

Under Sections 1600–1616 of the California Fish and Game Code, the California Department of Fish and Wildlife (CDFW) regulates activities that would alter the flow, bed, channel, or bank of streams and lakes. The limits of CDFW's jurisdiction are defined in the code as the "bed, channel or bank of any river, stream, or lake designated by the department in which there is at any time an existing fish or wildlife resource or from which these resources derive benefit" (Section 1601). In practice, CDFW usually marks its jurisdictional limit at the top of the stream or bank, or at the outer edge of the riparian vegetation, whichever is wider.

2.4 City of Santa Barbara Local Coastal Program

Under the California Coastal Act (CCA), the CCC regulates impacts to wetlands within their jurisdiction (the "Coastal Zone") and requires a coastal development permit for almost all development within this zone. Within the City of Santa Barbara Coastal Zone, the City has assumed jurisdiction and is responsible for the issuance of a coastal development permit in accordance with its certified Local Coastal Program (LCP; City 2019), and the CCC assumes jurisdiction only if the City's permit action is appealed. Section 30121 of the CCA defines wetlands as "lands within the Coastal Zone which may be covered periodically or permanently with shallow water and include saltwater marshes, swamps, mudflats, and fens…." The CCA allows disking, filling, or dredging of wetlands for certain uses, such as restoration. Under Section 30121 of the CCA, coastal wetlands are defined as areas supporting a single wetland parameter (i.e., hydrophytic vegetation, hydric soils, and wetland hydrology—"one-parameter" wetlands), in contrast to the three-parameter definition of the USACE. Additionally, under Section 30231 of the CCA, the CCC policies include maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams. Activities that will potentially affect coastal wetland and riparian resources require a coastal development permit from the City under the LCP (City 2019).

Local Coastal Program

The Biological Resources section of the LCP (City 2019) both designates environmentally sensitive habitats areas (ESHAs) and setbacks for specific locations and provides guidelines for determining them elsewhere.

The general requirements for setbacks around ESHAs are stated in policy 4.1-15 of the LCP:

> **Policy 4.1-15 ESHA, Wetland, and Creek Habitat Buffers.** New development and substantial redevelopment in areas adjacent to ESHAs, wetlands, and creeks shall be sited and designed to prevent impacts that would significantly degrade those areas, and shall be compatible with the continuance of those habitat areas. A habitat buffer shall be required between new development or substantial redevelopment and any ESHA, wetland, or creek and shall be of sufficient size to: protect biological integrity, serve as transitional habitat, provide distance from human disturbances, and avoid hazards from erosion.
>
> **Policy 4.1-17 Development within Habitat Buffer Areas.**
>
> A. New development and substantial redevelopment shall only be allowed in ESHA, wetland, and creek habitat buffers if it does not significantly disrupt the habitat values of ESHAs, wetlands, or creeks and may include:

i. Habitat creation, restoration, and/or enhancement activities;

ii. Public accessways, trails, and associated minor improvements. Impervious trails, accessways, and associated minor improvements shall be located a minimum of 35 feet from the top of bank of any creek to the extent feasible;

iii. Directional, educational, and interpretive signs to protect public safety, manage open space areas, educate, and direct public access;

iv. Nature study;

v. ESHA-, wetland-, and creek-related educational uses;

vi. Bioswales or other bioengineered or non-structural storm water Best Management Practices (BMPs), provided that encroachment into the habitat buffer is minimized to the extent feasible and the BMP is designed to avoid impacts to ESHAs, wetlands, and creeks;

vii. Improvements to existing roads, road rights-of-way, utilities, public infrastructure and facilities, and public parking lots in a manner that involves no increase in development footprint for the portion within the habitat buffer area. If the improvement involves relocation, the new site shall be located no closer to ESHAs, wetlands, or creeks than the existing site and shall minimize encroachment into the habitat buffer to the maximum extent feasible;[1]

viii. Fuel modification required by the City Fire Department to meet the Fire Code Defensible Space Requirements for existing development in High Fire Hazard Areas;

ix. Geologic testing or boring;

x. Mosquito abatement; and

ix. The following uses may be allowed where the encroachment into the habitat buffer is minimized to the extent feasible, where all feasible mitigation measures have been provided to minimize adverse environmental effects, and the maximum feasible habitat buffer between the development and the habitat is provided:

a. Adjacent to wetland areas, incidental public services and utilities and development required to complete a project pursuant to Policy 4.1-7 *Diking, Filling, or Dredging of Coastal Waters and Wetlands*;

b. Adjacent to creek areas, flood control projects necessary for public safety or to protect existing development, and necessary water supply and wastewater projects;

c. Fuel modification only when required by the City Fire Department to meet the Fire Code Defensible Space requirements for a new or substantially redeveloped primary structure

[1] With regard to the wetland setback for the storm drain ditch, the City, in a December 2021 letter provided by its Land Development Team (City 2021), stated that "Staff recommends a 15-foot buffer from the top of bank for this wetland area."

in a High Fire Hazard Area. New and substantially redeveloped accessory structures shall be sited to ensure that vegetation management necessary to meet City High Fire Hazard Defensible Space Requirements does not occur within habitat buffers to ESHAs, wetland, or creeks;

d. Structural, non-earthen storm water BMPs, provided that they are located a minimum of 35 feet from top of bank of any creek;

e. Limited exterior lighting for safety purposes; and

f. Fences or natural barriers necessary for safety, restoration, protection of habitat, or water quality improvement.

B. New development and substantial redevelopment that is not allowed within ESHA, wetland, and creek habitat buffers pursuant to subsection A. above shall also not be allowed to overhang or otherwise partially encroach into ESHA, wetland, and creek habitat buffers.

Policy 4.1-39 Wetlands Defined. As outlined in Coastal Act Section 30121, wetlands are lands within the Coastal Zone that may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens. As detailed in Section 13577(b)(1) of the California Code of Regulations, wetlands shall be defined as land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and shall also include those types of wetlands where vegetation is lacking and soil is poorly developed or absent as a result of frequent and drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salts or other substances in the substrate. Such wetlands can be recognized by the presence of surface water or saturated substrate at some time during each year and their location within or adjacent to vegetated wetlands or deep-water habitats. Any areas that meet these definitions are wetlands and shall be accorded all of the protections provided for wetlands in the Coastal LUP, whether or not they were previously identified or mapped.

Policy 4.1-40 Environmentally Sensitive Habitat Areas Defined. As defined in Coastal Act Section 30107.5, areas in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments are Environmentally Sensitive Habitat Areas (ESHAs).

Policy 4.1-41 ESHA Determinations.

A. Identification of ESHAs shall be made on a case-by-case basis based upon site-specific evidence provided by a biological report prepared in accordance with Policy 4.1-42 Biological Reports and Wetland Delineations, and in consultation with a City Environmental Analyst. Any areas that meet the criteria outlined in Policy 4.1-40 Environmentally Sensitive Habitat Areas Defined shall be afforded all of the protections provided for ESHAs in the LUP, whether or not they have been previously identified or mapped.

B. Any determination of the location or extent of ESHAs must address:

Rare Species or Habitats. The first test to determine whether a habitat is an ESHA is whether a habitat or species (and its associated habitat) is rare. The California Natural Diversity Database (CNDDB) is a

state depository of lists of rare plant and animal species and rare natural communities (e.g., habitats, vegetation communities), generated by an array of regional, state, national, and international sources that are vetted, maintained, and continually updated by the Biogeographic Branch of the California Department of Fish and Wildlife (CDFW). The species and habitats on the following lists are considered rare:

a. Federal and state listed Rare, Threatened and Endangered Species;

b. Plants, animals, and natural communities ranked as of Global or state G1 or S1 (critically imperiled), G2 or S2 (imperiled), or G3 or S3 (vulnerable to extirpation or extinction) by the California Department of Fish and Wildlife's Natural Diversity Database and NatureServe;

c. California Fully Protected Species, California Species of Special Concern, and their habitats;

d. California Native Plant Society (CNPS) plant species designated 1B (rare or endangered in California and elsewhere), and 2 (rare, threatened, or endangered in California but more common elsewhere); and

e. Federal and state plants, animals, and natural communities that are candidates for listing or delisting.

Especially Valuable Species or Habitats. A second test to determine whether a habitat is an ESHA is whether a species or habitat is especially valuable because of its special nature or role in an ecosystem. Areas may be valuable because of their "special nature," such as being an unusually pristine example of a habitat type, containing an unusual mix of species, supporting species at the edge of their range, or containing species with extreme variation. Habitats or species may also be considered valuable because of their special "role in the ecosystem" because they provide habitat for endangered species, protect water quality, provide essential corridors linking one sensitive habitat to another, or provide critical ecological linkages such as the provision of pollinators or crucial trophic connections. While all species play a role in their ecosystem that is arguably "special," for a habitat or species to be considered an ESHA, its role must be considered "especially valuable;"

Potential for Human Induced Disturbance or Degradation. Thirdly, ESHAs are those areas that could be easily disturbed or degraded by human activities and developments. In most areas of coastal California affected by urbanization, native plants, animals, and natural communities are in danger of direct loss or significant degradation as a result of many factors related to anthropogenic changes; and

Habitat Quality. Finally, judgment of the viability and quality of a habitat area must be conducted by a qualified biologist, ecologist, or resource specialist on a case-by-case basis, taking into account the physical and biological conditions and requirements necessary for the health and sustainability of the respective species or habitat. Such consideration includes assessment of the following criteria:

a. Size of the population or habitat;

b. Evidence of population/habitat health (sprouts, seedlings, adult individuals of reproductive age);

c. Level of isolation/fragmentation;

d. Connectivity to other natural areas/open space;

e. Level of disturbance/degradation of the area;

f. Invasive, non-native species;

g. Disease or insect damage; and

h. Anthropogenic disturbance (development, grading, ornamental plants, agriculture, livestock, etc.). Certain habitats in specific locations may not be ESHAs because they are extremely degraded, too small to be sustainable, have been taken over by invasive and non-native species, or are so isolated or fragmented that they are not viable in the long term or do not have substantial habitat value or a special role in the ecosystem. However, some habitats, like coastal estuaries, wetlands, creeks, and many riparian areas, are so rare or play such an important role in the ecosystem that they should be considered ESHAs, even if significantly degraded. It is important to note that while habitat viability and quality are factored into decisions as to whether an area is an ESHA, once an area has been determined to be an ESHA, all the policies protecting ESHA in the Coastal LUP apply regardless of the quality of the ESHA.

C. Habitat types that could potentially occur in the City of Santa Barbara's Coastal Zone that usually meet the definition of an ESHA include, but are not limited to, the list below. General areas where these habitat types have the potential to occur are shown on Figure 4.1-1 *Potential Vegetation Communities*. For any particular area, site-specific evidence may indicate that the site does not meet the definition of an ESHA. Conversely, there are areas not contained in the following list that could be determined by site-specific evidence to meet the definition of an ESHA. The status and presence of certain habitats within the City is also subject to change over time.

i. Estuaries and Lagoons.

ii. Wetlands.

ii. Creeks and Streams.

iv. Riparian Areas.

v. Southern Coastal Bluff Scrub.

vi. Coastal Sage Scrub or Chaparral that:

a. Supports sensitive species;

b. Is within or adjacent to creeks, riparian, or wetland ESHAs and is an important component in the functioning of these habitats; or

c. Is a vegetation association or alliance with a global or state ranking of 1, 2, or 3 on the California Department of Fish and Wildlife's Natural Diversity Database or NatureServe

vii. Perennial Grasslands (Coastal Prairie).

viii. Oak Woodlands.

ix. Southern Foredune.

x. Western Snowy Plover Nesting Habitat.

xi. White-Tailed Kite Nesting and Communal Roosting Habitat.

xii. Monarch Butterfly Autumnal and Winter Roost Sites.

3 Methods

As the initial step of the formal aquatic resources delineation, Dudek conducted a literature review of publicly available sources documenting known or potential aquatic resources within the study area and in the local vicinity. These included National Wetland Inventory (NWI; USFWS 2022), the National Hydrography Dataset (NHD; USGS 2022), the U.S. Geological Survey (USGS) 7.5-minute Santa Barbara quadrangle map, historical aerial photographs, and previous biological studies completed within the study area. On January 2, 2019, Dudek surveyed the project site to delineate aquatic features and determine the extent of wetland and other waters of the U.S. potentially subject to USACE jurisdiction under the CWA. On March 3, 2022, Dudek regulatory and permitting specialist Heather Moine conducted a follow-up survey to verify the 2019 delineation. Both aquatic resources delineations were conducted in accordance with the procedures established in the *Corps of Engineers Wetlands Delineation Manual* (USACE Environmental Laboratory 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (USACE Environmental Laboratory 2008a). In the absence of wetlands, the limits of USACE jurisdiction in non-tidal waters, such as intermittent streams, extend to the ordinary high water mark (OHWM) (33 CFR 328.3(e)), the delineation of which follows *A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States* (USACE Environmental Laboratory 2008b).The aquatic resources delineations also included the collection of CDFW jurisdictional boundaries subject to Section 1600-1616 of the Fish and Game Code (DFG Code), which extend to the top of bank or the outermost edge of riparian vegetation, whichever is greater, associated with a stream channel or waterway. Lastly, the aquatic resources delineations included an evaluation of the study area for features meeting the definition of a coastal wetland under Section 30121 of the CCA. During the March 2022 verification, boundaries of potentially jurisdictional aquatic resources were mapped using a handheld iOS device equipped with the ESRI Collector app and a Trimble R1© Integrated GNSS System device for boosting the geographic information system (GIS) signal to submeter accuracy. Prior to the delineation field survey, Dudek also loaded the top of bank boundary for the drainage ditch as provided by Gilmour Land Surveying, Inc. During the field survey, Dudek compared the top of bank boundaries mapped in 2019 by Dudek and in 2022 by Gilmour Land Surveying with conditions observed in the field to determine the most accurate boundary.

4 Results

4.1 Wetland Habitat

Based on the findings of the formal aquatic resources delineation, Dudek determined that habitat meeting the definition of a one-parameter wetland is located within the Garden Street Drain. The Garden Street Drain was found to support indicators of riverine wetland hydrology and giant reed (*Arundo donax*) and California bullrush (*Schoenoplectus californicus*), species with wetland indicator status of FACW and OBL, respectively (Attachment A, Figure 2). The sole biological issue addressed in SAIC (2007) was the potential presence of jurisdictional resources. The report focused on the characterization of the above-mentioned Garden Street Drain, which "may qualify as a wetland pursuant to the Coastal Act." (SAIC 2007). The general findings of the wetland delineation completed by Dudek are largely consistent with those detailed in the SAIC biological analysis report (SAIC 2007), including the verification of only one aquatic feature extending along the boundary of the study area parallel to Garden Street. The single aquatic feature is characterized as an anthropogenic, vegetated, soft-bottom storm drain ditch supporting a limited variety of wetland- and upland-adapted, largely non-native plant species. In both 2019 and 2022, it was necessary to inspect and record the presence of indicators for a total of only two (2) sampling points (Attachment A, Figure 2). In addition, Dudek delineated the top of bank and edge of any riparian vegetation associated with the Garden Street Drain. Representative photographs of the aquatic feature are provided in Attachment B. Wetland Determination Data Forms are provided in Attachment C.

Hydrophytic vegetation was present within the Garden Street Drain and was limited to two plant species: giant reed and California bulrush. Each plant species encountered within the Garden Street Drain and its respective indicator status are listed in Table 1 below. Wetland indicator status is based on the Arid West 2020 Regional Wetland Plant List (USACE 2020). Giant reed, a facultative wetland species, is present in an isolated, monotypic stand within the Garden Street Drain. Facultative wetland species are found in both wetland and non-wetland habitats and can tolerate a variety of hydrologic regimes (Lichvar et al. 2012). California bulrush was found in one location within the Garden Street Drain. California bulrush was limited to a few individual plants and was not considered to be a dominant species within the ditch, although as an obligate wetland species, it almost always occurs in wetlands (Lichvar et al. 2012). Other dominant plant species identified within the storm drain ditch included upland-adapted species comprising castor bean (*Ricinus communis*), pampas grass (*Cortaderia selloana*), and Canary Island palm (*Phoenix canariensis*) in the shrub strata. The occurrence of these and other species shading and immediately along the Garden Street Drain support a highly degraded area of riparian vegetation (Figure 2). Note that, while the riparian vegetation in places overlaps existing development, overhanging a chain link fence bordering the Garden Street Drain, riparian vegetation was mapped to the edge of the canopy, as shown in Figure 2.

Dominant plant species in the herbaceous strata include upland-adapted species comprising ripgut brome (*Bromus diandrus*) and smilo grass (*Stipa miliacea* var. *miliacea*). In several places within the Garden Street Drain, vegetation has been disturbed due to the presence of homeless encampments or accumulations of trash.

No indicators of hydric soils were encountered during the inspection of the sampling points. Soils within the study area have been historically disturbed by development and are mapped as Aquents, fill areas (USDA and NRCS 2022a), which are characterized as earthen fill from variable sources. This soil type is not listed as hydric on the NRCS Hydric Soil List (USDA and NRCS 2022b). However, as part of the wetland delineation, Dudek investigated soils for the presence of indicators described in the *Field Indicators of Hydric Soils in the United States: A Guide for*

Identifying and Delineating Hydric Soils (USDA and NRCS 2018) to determine hydric status. Based on the uniform nature of the feature, one sampling point was analyzed in the bottom of the ditch, immediately upstream of a concrete culvert, which was determined to be sufficient to characterize the hydric status of soils within the feature. This sampling point was selected due its location in a topographical depression within the ditch, presumably increasing the potential for ponding and creation of anaerobic conditions suitable for hydric soil formation. A second sampling point was inspected on the eastern slope of the ditch, approximately six (6) vertical feet above the bottom of the ditch. The sampling locations were selected based on accessibility and the apparent lack of human disturbance relative to other portions of the ditch.

Table 1. Plant Species List and their Wetland Indicator Status

Species	Common Name	Indicator Status
*Arundo donax**	giant reed	FACW
*Bromus diandrus**	ripgut brome	NL
Chenopodium murale	nettleleaf goosefoot*	FACU
*Cortaderia selloana**	Uruguayan pampas grass	FACU
*Eridoium cicutarium**	redstem stork's bill	NL
*Erodium moschatum**	musky stork's bill	NL
*Euphorbia peplus**	petty spurge	NL
Galium aparine	stickywilly	FACU
Hordeum murinum	mouse barley*	FACU
Malva parvaflora	Cheeseweed mallow*	NL
*Nicotiana glauca**	tree tobacco	FAC
*Oxalis pes-caprae**	sourclover	NL
*Phoenix canariensis**	Canary Island date palm	NL
Stipa miliacea var. *miliacea**	smilo grass	NL
*Ricinus communis**	castor bean	FACU
*Rumex crispus**	curly dock	FAC
Schoenoplectus californicus	California bulrush	OBL
*Sonchus oleraceus**	common sow thistle	UPL
*Tropaeolum majus**	nasturtium	UPL

* signifies a non-native species
Obligate Wetland (OBL), Facultative Wetland (FACW), Facultative (FAC), Facultative Upland (FACU), Upland (UPL), Not Listed (NL) Arid West 2020 Regional Wetland Plant List (USACE 2020)

Dudek determined that wetland hydrology was present within the Garden Street Drain (Attachment A, Figure 2). Hydrology was assessed within the sampling points as well as throughout the length of the Garden Street Drain to determine the presence of wetland hydrology indicators, an OHWM, or a defined bed and bank in accordance with the methodology described in Section 3. Additionally, Dudek assessed connectivity with adjacent jurisdictional waters. The Garden Street Drain was determined to flow in a north to south direction along a linear path, and to be confined within a relatively narrow channel, which begins as a shallow swale at the upstream end and turns into a relatively deep channel at the downstream end, where it discharges into a concrete culvert. Based on the literature review as well as observations

collected during the wetland delineation, the Garden Street Drain is an anthropogenic feature constructed to convey urban runoff and stormwater flows. The northern (upstream) end of the ditch is isolated from flows further to the north and east along Garden Street and Yanonali Street by curb and gutter features as well as a slight rise in the topography, which would preclude concentrated water inputs from entering the ditch. The ditch is separated from the remainder of the study area by a chain-link fence, and the majority of the water inputs are anticipated to originate from the study area via sheet flow during storm events. One culvert originating from the upland portion of the study area was identified, and it apparently discharges into a short swale, which connects to the concrete culvert in the Garden Street Drain. No other areas displaying evidence of concentrated flow were identified during the aquatic resources delineation. Wetland hydrology indicators identified during the wetland delineation included water marks (B1), drift deposits (B3 – riverine) and drainage patterns (B10 – riverine) within the Garden Street Drain.

4.2 Waters of the U.S. and State

An OHWM was also identified and mapped based on the presence of a debris wrack line and water marks averaging approximately 3.0 feet in width. No other OHWM indicators (e.g., break in bank slope, change in sediment texture, or a change in vegetation cover) were encountered, which indicates that the flows within the ditch are generally slow moving and constitute low-energy runoff discharges. The OHWM was discontinuous within the Garden Street Drain due to human disturbances associated with homeless encampments. The defined bed and bank was also identified and mapped during the wetland delineation. While the extent of a typical channel bed would be determined based on indicators including a break in the bank slope, shelving, or benching, the low energy discharges within the Garden Street Drain are presumed to be insufficient to create these signs of flow. Absent these more typical indicators, the bed was determined to be coterminous with the OHWM width, based on the presence of a debris wrack line and water marks, which indicates a clearly defined flow path. The top of bank was determined based on the clear transition to uplands on both the east and west side of the Garden Street Drain, and was mapped at the point where the steeply-sloping bank shifts to a flat upland terrace lacking any indication of flow and associated riparian vegetation. The mapped extent of hydrology indicators are displayed on Attachment A, Figure 2.

Dudek confirmed that the Garden Street Drain is hydrologically connected to a TNW, the Pacific Ocean, via Laguna Channel. As noted above, the ditch discharges into a concrete culvert, at which point no visible connection is apparent. However, the City map (City 2013) maps show that this feature is hydrologically connected to Laguna Channel, which discharges into the Pacific Ocean approximately 0.26 mile (1,400 feet) downstream of the study area.

5 Jurisdictional Determination

Based on the results of the aquatic resources delineation, the Garden Street Drain identified within the study area is determined to be jurisdictional to the USACE, RWQCB, and CDFW (Table 2; Attachment A, Figure 2). The jurisdictional determination for each agency is provided below based on the agencies' respective jurisdictional definition described in Section 2.

The aquatic resources delineation resulted in the identification of wetland hydrology and isolated patches of hydrophytic vegetation within the Garden Street Drain. However, indicators of hydric soils were absent. As such, the Garden Street Drain is determined not to meet the definition of wetland waters of the U.S. under the CWA. Regardless, the ditch was found to support a readily identifiable OHWM based on the presence of a wrack line and water marks, and it is connected to Laguna Channel via a culvert under Garden Street, ultimately discharging into the Pacific Ocean. While a stormwater conveyance feature is not considered USACE jurisdictional by rule, the feature

is located within 4,000 linear feet of the Pacific Ocean (a TNW) and is therefore evaluated on a case-specific basis for a significant nexus with a jurisdictional water. Based on the connection with Laguna Channel and the presence of an OHWM, the feature is considered similarly situated and would be under the jurisdiction of the USACE within the extent of the OHWM as other waters of the U.S. (Attachment A, Figure 2).

Table 2. Jurisdictional Wetlands and Waters within the Study Area

Agency	Jurisdictional Resource	Acres/square feet
USACE, RWQCB, CDFW, and City (LCP)	Other Waters of the U.S., coastal wetland	0.025/1,085
RWQCB, CDFW	Waters of the State (riparian, streambed and bank)	0.207/9,017

Under Section 401 of the CWA, the RWQCB jurisdiction is coterminous with the USACE and would include the other waters of the U.S. described above (Attachment A, Figure 2). In addition, the RWQCB also regulates impacts to water quality and beneficial uses of waters of the State as defined in the Basin Plan. Although the Garden Street Drain is hydrologically connected to Laguna Channel, no beneficial uses are listed for this waterway (RWQCB 2017). However, as discussed in Section 2.2, waters of the State include "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code 13050(e)). Currently, the RWQCB also regulates riparian vegetation as waters of the State. Riparian vegetation includes hydrophytic as well as upland-adapted species that are supported by the hydrologic conditions within a jurisdictional waterway. Within the Garden Street Drain, riparian vegetation is made up almost entirely of non-native species including giant reed, castor bean, and Uruguayan pampas grass; however, the vegetation is supported by the hydrologic conditions within the ditch, and therefore is considered riparian. Within the study area, the surface waters are contained within the top of bank of the Garden Street Drain, but riparian vegetation extends beyond the banks in several places. Therefore, the outer limit of the combined area delimited by the top of bank and the edge of riparian, where it extends beyond the top of bank, meets the definition of waters of the State, which includes other waters of the U.S., and is considered to be under the jurisdiction of the RWQCB (Attachment A, Figure 2).

The CDFW jurisdiction extends to the outermost limit of the defined bed and bank and associated riparian vegetation of ephemeral, intermittent, and perennial waterways (Attachment A, Figure 2). The area described above and defined as waters of the State under the jurisdiction of RWQCB encompasses each of the components of CDFW jurisdiction, including the defined bed and bank and riparian vegetation. Therefore, in this case, CDFW jurisdiction in coterminous with that of the RWQCB.

CCC may, in some cases, retain appeal jurisdiction surrounding coastal wetlands that are within the City's LCP jurisdiction, as these habitats are considered ESHA under the CCA and LCP (City 2019) Policy 4.1-41. As discussed above, "one-parameter" wetlands were identified within the Garden Street Drain, which was found to support indicators of wetland hydrology and of hydrophytic vegetation within the area supporting hydrology (Attachment A, Figure 2). The City's Post LCP Certification Permit and Appeal Jurisdiction Map does show the subject property within CCC's appeal jurisdiction. However, this designation is not based on the presence of coastal wetlands or ESHA, but rather on the presence of public trust lands that are filled, developed, and committed to urban uses, pursuant to CCA Section 30613. Therefore, the coastal wetlands on site are not considered jurisdictional to CCC, and no further approvals or permitting actions are required by CCC for the proposed development.

Although the Garden Street Drain supports areas of riparian vegetation supported by hydrological conditions within the drain, as described above, these areas are highly degraded and do not qualify as ESHA under the LCP policies (City 2019). Policy 4.1-41 states that "For any particular area, site-specific evidence may indicate that the site does not meet the definition of an ESHA." Under Policy 4.1-41, the location or extent of ESHA is determined by several factors: presence of rare species or habitats; whether a species or habitat is especially valuable (e.g., due to its role in water quality, its importance as a habitat linkage, or its special role in the ecosystem); potential for human-induced disturbance or degradation; and viability and quality of the habitat. Because the Garden Street Drain is highly degraded, supporting almost entirely non-native vegetation and a high level of existing disturbance, it does not meet any of these ESHA criteria, as explained in detail below.

Presence of rare species or habitat. No rare plant species have been detected within the Garden Street Drain or anywhere on site, and given the highly disturbed nature of the site, the presence of extensive invasive vegetation, and its isolation from other natural habitats, no rare species have the potential to occur. Several rare species, and species listed under the federal Endangered Species Act (ESA) occur in the vicinity. However, the site does not support the persistent aquatic habitat required to support many of these species, it is unsuitable and too limited in extent to support any sensitive bird species, and it lacks dune or beach habitat suitable for species preferring these areas. One special-status wildlife species known to occur in the area along Laguna Creek and El Estero Drain is western pond turtle (*Emys marmorata*), a California species of special concern. But, in addition, to lacking habitat that could support this species in its aquatic phase, the site is separated from these areas by more than 400 feet of development, including Garden Street and associated vehicle traffic.

Especially valuable species or habitat. The Garden Street Drain meets none of the criteria listed in Policy 4.1-41 to qualify as "especially valuable." As mentioned above, it is isolated from other natural habitats and is highly degraded from invasive species and human disturbance, so it does not play a "special role in the ecosystem" and is not "an unusually pristine example of a habitat type." It does not support "an usual mix of species" or support "species at the edge of their range." Because the feature drains only a small area encompassing a portion of the project site, it does not play an important role in water quality. Because of its limited size and isolation from other habitats, it plays no role as an ecological linkage.

Potential for human-induced degradation or disturbance. The Garden Street Drain is currently highly disturbed, with several existing homeless encampments and several trash piles providing breaks in the vegetative cover. The entire surrounding area is already developed. Because of this baseline of disturbance, the feature does not meet this criterion as ESHA.

Viability and quality of habitat. Policy 4.1-41 lists a variety of factors to judge habitat quality. Several relate to population size and isolation, and as the Garden Street Drain supports no sensitive species and is highly isolated by surrounding development, it does not meet these criteria. Others relate to disturbance level and presence of invasive species, and as described above the drain is highly disturbed and supports mostly invasive species.

Given the above analysis, the riparian vegetation supported by the Garden Street Drain outside the coastal wetland does not meet any of the criteria for ESHA in Policy 4.1-41. Therefore, the extent of ESHA within the Garden Street Drain and the site is limited to coastal wetland as shown in Figure 2.

6 Project Impacts to Aquatic Resources

The proposed project is expected to result in 99 square feet of permanent impacts to the Garden Street Drain and associated non-native riparian vegetation due to widening of the driveway at the Garden Street entrance (Table 3; Attachment A, Figure 3). In addition, grading and recontouring adjacent to the driveway will result in 244 square feet of temporary impacts to the Garden Street Drain and associated non-native riparian vegetation (Table 4; Attachment A, Figure 3). These impacts will be limited to waters of the State under the jurisdictions of CDFW and RWQCB. As required by the City (2021), the proposed project incorporates a 15-foot development setback from the top of bank of the Garden Street Drain (Attachment A, Figure 3). However, based on City requirements for site access at the Garden Street entrance, widening of the existing driveway will also result in encroachment of 763 square feet of the setback from the top of bank. The project will result in no impacts to coastal wetland that is considered ESHA or to any area under the jurisdiction of USACE. The project's Habitat Restoration Plan (Attachment D) describes revegetation of the Garden Street Drain and 15-foot setback with native vegetation.

Table 3. Proposed Permanent Impacts to Jurisdictional Waters and Wetlands

Agency	Jurisdictional Resource	Square Feet	Linear Feet
USACE, RWQCB, CDFW, and CCC	Other Waters of the U.S., Coastal Wetland/ESHA	0	0
RWQCB, CDFW	Waters of the State	99	10

Table 4. Proposed Temporary Impacts to Jurisdictional Waters and Wetlands

Agency	Jurisdictional Resource	Square Feet	Linear Feet
USACE, RWQCB, CDFW, and City (LCP)	Other Waters of the U.S., Coastal Wetland/ESHA	0	0
RWQCB, CDFW	Waters of the State	244	10

7 Summary

Aquatic resources within the Garden Street Hotel project site are limited to a storm drain ditch along Garden Street (the Garden Street Drain), which supports 0.025 acres of other waters of the U.S. subject to the jurisdiction of USACE that is also waters of the State subject to the jurisdiction of RWQCB, streambed and bank subject to the jurisdiction of CDFW, and coastal wetland subject to the jurisdiction of the City's LCP (as the implementing authority of the CCA). An additional 0.207 acres within the Garden Street Drain and associated non-native riparian that is not considered waters of the U.S. is subject to RWQCB and CDFW jurisdictions. The project would result in 99 square feet of permanent impacts to a portion of the Garden Street Drain and associated non-native riparian subject to RWQCB and CDFW jurisdictions. It would result in an addition 244 square feet of temporary impacts to these jurisdictions. Encroachment within the Garden Street Drain 15-foot setback due to modifications to the Garden Street entrance to the site are necessary to meet site access requirements. The remainder of the Garden Street Drain and setback will be restored and enhanced in accordance with specifications of the Habitat Restoration Plan (Attachment D).

If you have any questions regarding the contents of this letter report, please feel free to contact Heather Moine at 805.308.8522 (office) or 805.403.6241 (cell) or via email at hmoine@dudek.com. Or contact Dave Compton at 805.308.8536 (office) or 805.252.0557 (cell) or via email at dcompton@dudek.com.

Sincerely,

Heather Moine

Heather Moine
Aquatic Resource and Permitting Specialist

Dave Compton
Senior Biologist

Att.: *A Figures*
B Data Forms
C Photographs
D Habitat Restoration Plan
cc: *Carolyn Groves, Dudek*
Dave Irelan, Delawie

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Attachment A

Figures

SOURCE: ESRI World Imagery

DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location

Garden Street Hotel Aquatic Resources Delineation

Project Site

Potential Jurisdictional Areas

Other Waters of the U.S./Waters of the State - USACE, RWQCB, CDFW, CCC wetland/ESHA

Streambank/Riparian - RWQCB, CDFW

Top of Bank

15-foot Setback from Top of Bank

Non-Jurisdictional Resources

2022 Wetland Sampling Point (SP)

2019 Data Station (DS)

Culvert

Culvert Pipe

Headwall

Swale

Yanonali St

119° 41' 18.725" W
34° 25' 1.431" N

SP01

SP02

DS1

DS2

Headwall

Culvert Inlet

Swale

Culvert Pipe

Culvert Outlet

Santa Barbara St

Gray Ave

Garden St

119° 41' 15.741" W
34° 24' 53.949" N

SOURCE: Sanborn 2020

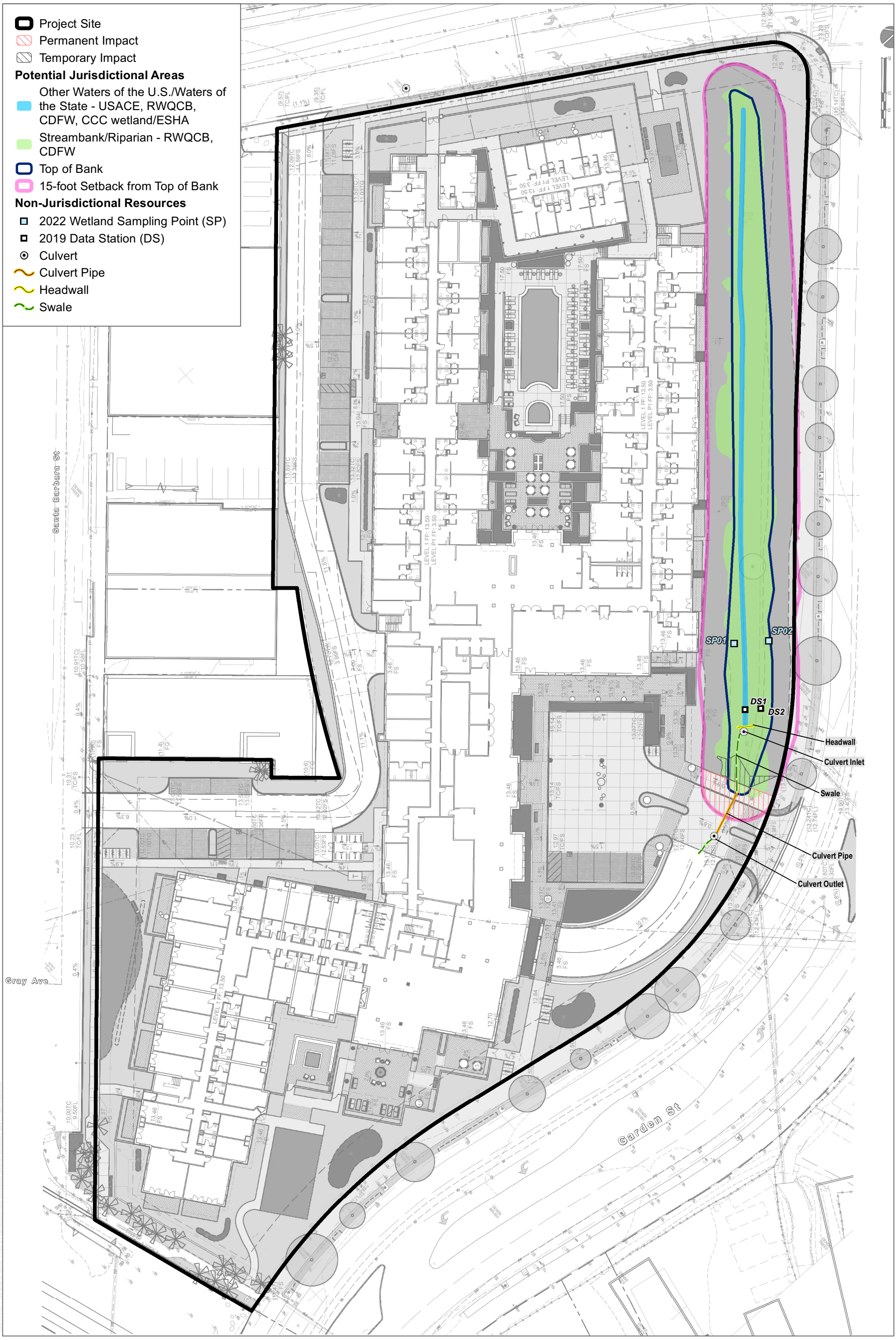
DUDEK

0 25 50 Feet

FIGURE 2

Aquatic Resources Delineation

Garden Street Hotel Aquatic Resources Delineation



SOURCE: Sanborn 2020, Flowers and Associates 2022

DUDEK

0 25 50 Feet

FIGURE 3

Impacts

Garden Street Hotel Aquatic Resources Delineation

Attachment B
Photos

Photo 1. Looking northwest along the storm drain ditch, March 3, 2022

Photo 5. Looking southeast along the storm drain ditch, March 3, 2022

Photo 5. Debris within the storm drain ditch, March 3, 2022

Photo 5. Looking northwest to SP02, March 3, 2022

Photo 5. Soil profile for sample point SP01, March 3, 2022

Photo 6. Soil profile for sample point SP02, March 3, 2022

Photo 7. Trash associated with homeless encampment, August 3, 2022

Photo 8. Trash within Garden Street Drain, August 3, 2022

Attachment C

Data Forms

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: 101 Garden Street City/County: Santa Barbara / Santa Barbara Sampling Date: 3/3/2022
Applicant/Owner: State: CA Sampling Point: SP01
Investigator(s): Heather Moinie Section, Township, Range: 23, 04N, 27W
Landform (hillslope, terrace, etc.): ditch Local relief (concave, convex, none): concave Slope (%): ~1
Subregion (LRR): C Lat: 34.416373°N Long: 119.687730°W Datum:
Soil Map Unit Name: Aquents, fill areas NWI classification: N/A
Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No ____ (If no, explain in Remarks.)
Are Vegetation ____, Soil ____, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes X No ____
Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No X	Is the Sampled Area within a Wetland? Yes ____ No X
Hydric Soil Present?	Yes ____	No X	
Wetland Hydrology Present?	Yes X	No ____	

Remarks: high amounts of trash present within feature and within soil. Transient persons observed within feature

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: ____)	Absolute % Cover	Dominant Species?	Indicator Status
1. N/A			
2.			
3.			
4.			
	Ø = Total Cover		
Sapling/Shrub Stratum (Plot size: 20m²)			
1. Cortaderia selloana	40	Y	FACU
2. Ricinus communis	10	N	FACU
3. Nicotiana glauca	10	N	FAC
4.			
5.			
	60 = Total Cover		
Herb Stratum (Plot size: 20m²)			
1. Schoenoplectus californicus	10	Y	OBL
2. Tropaeolum majus	5	N	UPL
3. Rumex crispus	<1	N	FAC
4. Galium aparine	<1	N	FACU
5. Euphorbia peplus	<1	N	NL
6.			
7.			
8.			
	~15 = Total Cover		
Woody Vine Stratum (Plot size: ____)			
1.			
2.			
	Ø = Total Cover		

% Bare Ground in Herb Stratum 25 % Cover of Biotic Crust Ø

Dominance Test worksheet:
Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)
Total Number of Dominant Species Across All Strata: 2 (B)
Percent of Dominant Species That Are OBL, FACW, or FAC: 50 (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species 10	x 1 = 10
FACW species 0	x 2 = 0
FAC species 10	x 3 = 30
FACU species 50	x 4 = 200
UPL species 5	x 5 = 25
Column Totals: 75 (A)	265 (B)

Prevalence Index = B/A = 3.53

Hydrophytic Vegetation Indicators:
N Dominance Test is >50%
N Prevalence Index is ≤3.0[1]
N Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
N Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ____ No X

Remarks: NL = Not Listed
Bare ground - is covered w/ thatch, old dead plant material

SOIL

Sampling Point: SP01

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0-5	—	—	—	—	—	—	—	organic dead plant material
5-8	10YR 3/2	100	—	—	—	—	loam	high amounts organic dead plant material
8-16	10YR 2/2	100	—	—	—	—	loam	high amount of rocks

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5) (**LRR C**)
- ___ 1 cm Muck (A9) (**LRR D**)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Vernal Pools (F9)

Indicators for Problematic Hydric Soils[3]:

- ___ 1 cm Muck (A9) (**LRR C**)
- ___ 2 cm Muck (A10) (**LRR B**)
- ___ Reduced Vertic (F18)
- ___ Red Parent Material (TF2)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type: rock

Depth (inches): 16

Hydric Soil Present? Yes ____ No X

Remarks:

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1) (**Nonriverine**)
- ___ Sediment Deposits (B2) (**Nonriverine**)
- ___ Drift Deposits (B3) (**Nonriverine**)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Water-Stained Leaves (B9)
- ___ Salt Crust (B11)
- ___ Biotic Crust (B12)
- ___ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- X Water Marks (B1) (**Riverine**)
- ___ Sediment Deposits (B2) (**Riverine**)
- X Drift Deposits (B3) (**Riverine**)
- X Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present? Yes ____ No X Depth (inches): —

Water Table Present? Yes ____ No X Depth (inches): —

Saturation Present? (includes capillary fringe) Yes ____ No X Depth (inches): —

Wetland Hydrology Present? Yes X No ____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: 101 Garden Street City/County: Santa Barbara / Santa Barbara Sampling Date: 3/3/2022

Applicant/Owner: State: CA Sampling Point: SP02

Investigator(s): Heather Moine Section, Township, Range: 23, 04N, 27W

Landform (hillslope, terrace, etc.): hillslope Local relief (concave, convex, none): Convex Slope (%): ~10

Subregion (LRR): C Lat: 34.416418 °N Long: 119.687690 °W Datum:

Soil Map Unit Name: Aquents, fill areas NWI classification: N/A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes X No _____

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____	No X	**Is the Sampled Area within a Wetland?** Yes _____ No X
Hydric Soil Present?	Yes _____	No X	
Wetland Hydrology Present?	Yes _____	No X	

Remarks:

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
	Ø = Total Cover		
Sapling/Shrub Stratum (Plot size: _____)			
1. Ricinus communis	<1	Y	FACU
2.			
3.			
4.			
5.			
	Ø = Total Cover		
Herb Stratum (Plot size: 20 m²)			
1. Bromus diandrus	20	Y	NL
2. Erodium cicutarium	20	Y	NL
3. Chenopodium murale	3	N	FACU
4. Malva parviflora	15	N	NL
5. Hordeum murinum	2	N	FACU
6.			
7.			
8.			
	60 = Total Cover		
Woody Vine Stratum (Plot size: _____)			
1.			
2.			
	Ø = Total Cover		

% Bare Ground in Herb Stratum 40 % Cover of Biotic Crust Ø

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: Ø (A)

Total Number of Dominant Species Across All Strata: 3 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: Ø (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species Ø	x 1 = Ø
FACW species Ø	x 2 = Ø
FAC species Ø	x 3 = Ø
FACU species 5	x 4 = 20
UPL species Ø	x 5 = Ø
Column Totals: 5 (A)	20 (B)

Prevalence Index = B/A = 4

Hydrophytic Vegetation Indicators:

N Dominance Test is >50%

N Prevalence Index is ≤3.0[1]

N Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

N Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes _____ No X

Remarks:

SOIL

Sampling Point: SP02

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0-13	10YR 3/3	100	—	—	—	—	loam	Some large rocks

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5) (**LRR C**)
- ___ 1 cm Muck (A9) (**LRR D**)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Vernal Pools (F9)

Indicators for Problematic Hydric Soils[3]:

- ___ 1 cm Muck (A9) (**LRR C**)
- ___ 2 cm Muck (A10) (**LRR B**)
- ___ Reduced Vertic (F18)
- ___ Red Parent Material (TF2)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type: rock

Depth (inches): 13

Hydric Soil Present? Yes _____ No X

Remarks: Small mammal burrows

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1) (**Nonriverine**)
- ___ Sediment Deposits (B2) (**Nonriverine**)
- ___ Drift Deposits (B3) (**Nonriverine**)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Water-Stained Leaves (B9)
- ___ Salt Crust (B11)
- ___ Biotic Crust (B12)
- ___ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water Marks (B1) (**Riverine**)
- ___ Sediment Deposits (B2) (**Riverine**)
- ___ Drift Deposits (B3) (**Riverine**)
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present? Yes _____ No X Depth (inches): —

Water Table Present? Yes _____ No X Depth (inches): —

Saturation Present? (includes capillary fringe) Yes _____ No X Depth (inches): —

Wetland Hydrology Present? Yes _____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

OHWM DATA SHEET

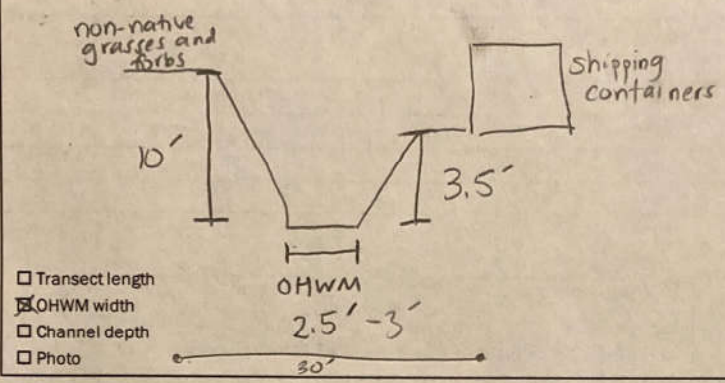
Project: 101 Garden Street Date: 3/3/2022 Feature ID: Garden

Investigator(s): Heather Moine Transect ID: Garden-OHWM-T-01

Site Location: 101 Garden Street - along Garden Street and adjacent E Yanonali Street

Feature Type: ☒ Ephemeral ☐ Intermittent ☐ Perennial ☐ Other

Transect (cross-section) drawing(s): View Facing: S



☐ Transect length
☒ OHWM width
☐ Channel depth
☐ Photo

OHWM Indicators (at OHWM; primary indicators indicated with *)

- ☐ Natural line impressed on the bank
- ☐ Shelving
- ☐ Changes in the character of soil (texture)*
- ☐ Destruction of terrestrial vegetation
- ☐ Presence of litter and debris
- ☒ Wracking - of debris
- ☐ Vegetation matted down, bent, or absent
- ☐ Sediment sorting
- ☐ Leaf litter disturbed or washed away
- ☐ Scour
- ☐ Deposition
- ☒ Bed and banks
- ☐ Water staining
- ☒ Change in plant community and/or cover*

☐ Break in Slope at OHWM*: ☐ Sharp (>60°) ☒ Moderate (30-60°) ☐ Gentle (<30°)

Soil Texture

	Clay/Silt	Sand	Gravel	Cobbles	Boulders
Above OHWM	X	X	X		
Below OHWM	X	X	X		

Total Vegetation Cover

	Tree (%)	Shrub (%)	Herb (%)	Bare (%)
Above OHWM	Ø	Ø	60	40
Below OHWM	Ø	60	15	25

Veg Stage: ☐ Early (herbs & seedlings) ☒ Mid (herbs, shrubs, saplings) ☐ Late (herbs, shrubs, mature trees)

Upland Species:	*Bank Species:*	*Emergent Species:*
Bromus diandrus Erodium cicutarium Chenopodium murale Malva parviflora Hordeum murinum	→ Same	Cortaderia selloana Ricinus communis Nicotiana glauca Schoenoplectus californicus Tropaeolum majus Rumex crispus Galium aparine Euphorbia peplus

OHWM DATA SHEET

Condition/Disturbances/Anthropogenic Influences (e.g., erosion, grazing, culverts, etc.):

anthropogenic disturbances - transients habitating feature. High amounts of trash present

Hydrology

☐ Flowing water	Avg. depth: —	Min. depth: —
☐ Standing water	Temp: —	Max. depth: —
☐ Saturated		
☒ Dry		

Checklist of resources (if available):

☒ Aerial photography	☐ Vegetation maps	☒ GPS unit
☐ Remotely-sensed images	☒ Soil maps	☐ Stream gage data
☐ Topographic maps	☐ Rainfall/precipitation data	☐ Other studies:
☐ Geologic maps	☒ Existing delineation(s) for site	

Other drawings (aerial view), notes:

Other forms related to this feature: ☒ Yes ☐ No

☒ Terrace, fringe, or floodplain wetland (wetland datasheet)

☐ Low flow channel or other representative section (OHWM datasheet)

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: 101 Garden St City/County: Santa Barbara Sampling Date: 1/2/19

Applicant/Owner: State: CA Sampling Point: DS1

Investigator(s): R. McTaggart Section, Township, Range:

Landform (hillslope, terrace, etc.): Ditch Local relief (concave, convex, none): concave Slope (%): 2-1

Subregion (LRR): C Lat: 34.416316640 Long: -119.687614107 Datum:

Soil Map Unit Name: Aquents, fill areas NWI classification: N/A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes X No _____

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____	No _____	**Is the Sampled Area within a Wetland?** Yes _____ No _____
Hydric Soil Present?	Yes _____	No _____	
Wetland Hydrology Present?	Yes _____	No _____	

Remarks: In a storm drain feature. Selected a representative location where water likely flows / ponds. Disturbances from homeless encampments w/in the feature.

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status
1. N/A			
2.			
3.			
4.			
	= Total Cover		
Sapling/Shrub Stratum (Plot size: 2m)			
1. Cortaderia selloana	50	Y	FACW
2. Ricinus communis	10	N	FACW
3.			
4.			
5.			
	60 = Total Cover		
Herb Stratum (Plot size: 1m)			
1. (Nasturtium) Tropaeolum majus	10	Y	UPL
2. Sonchus oleraceus	1	N	UPL
3. Bromus diandrus	10	Y	NL
4.			
5.			
6.			
7.			
8.			
	21 = Total Cover		
Woody Vine Stratum (Plot size: _____)			
1. N/A			
2.			
	= Total Cover		

% Bare Ground in Herb Stratum 79 % Cover of Biotic Crust _____

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across All Strata: 3 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0 (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species _____	x 1 = _____
FACW species _____	x 2 = _____
FAC species _____	x 3 = _____
FACU species 60	x 4 = 240
UPL species 21	x 5 = 105
Column Totals: 81 (A)	345 (B)

Prevalence Index = B/A = 4.25

Hydrophytic Vegetation Indicators:

___ Dominance Test is >50%

___ Prevalence Index is ≤3.0[1]

___ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes _____ No X

Remarks: Leaf litter makes up ~50% of the bare ground.

SOIL

Sampling Point: DS1

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0-1.5								Organic material
1.5-6.5	10YR 2/2	100	N/A				gravelly loam	Abundant leaf litter
6.5-12.5	10YR 3/2	100	N/A				gravelly loam	Abundant rocks

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5) (**LRR C**)
- ___ 1 cm Muck (A9) (**LRR D**)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Vernal Pools (F9)

Indicators for Problematic Hydric Soils[3]:

- ___ 1 cm Muck (A9) (**LRR C**)
- ___ 2 cm Muck (A10) (**LRR B**)
- ___ Reduced Vertic (F18)
- ___ Red Parent Material (TF2)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type: Rock.

Depth (inches): 12.5

Hydric Soil Present? Yes _____ No X

Remarks: Abundant organic material (leaf litter) in the upper 5" of soil. O horizon ~1.5" thick. Some red minerals but no apparent redox. Soil has trash & debris mixed in as well.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1) (**Nonriverine**)
- ___ Sediment Deposits (B2) (**Nonriverine**)
- ___ Drift Deposits (B3) (**Nonriverine**)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Water-Stained Leaves (B9)
- ___ Salt Crust (B11)
- ___ Biotic Crust (B12)
- ___ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- X Water Marks (B1) (**Riverine**)
- ___ Sediment Deposits (B2) (**Riverine**)
- X Drift Deposits (B3) (**Riverine**)
- X Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present? Yes _____ No X Depth (inches): _____

Water Table Present? Yes _____ No X Depth (inches): _____

Saturation Present? (includes capillary fringe) Yes _____ No X Depth (inches): _____

Wetland Hydrology Present? Yes X No _____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: Wracking present (leaf litter) also.

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: 101 Garden St. City/County: Santa Barbara Sampling Date: 1/2/19

Applicant/Owner: State: CA Sampling Point: DS 2

Investigator(s): R. McInvale Section, Township, Range:

Landform (hillslope, terrace, etc.): hill slope Local relief (concave, convex, none): Concave Slope (%): ~10

Subregion (LRR): C Lat: 34.4163866708 Long: -119.68760039208 Datum:

Soil Map Unit Name: Agents, fill areas NWI classification: N/A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes X No _____

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____ No _____	**Is the Sampled Area within a Wetland?** Yes _____ No _____
Hydric Soil Present?	Yes _____ No _____	
Wetland Hydrology Present?	Yes _____ No _____	

Remarks: On slope above the bottom of the ditch, approximately 6 vertical feet above base of ditch.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species?	Indicator Status
Tree Stratum (Plot size: _____)			
1. N/A			
2.			
3.			
4.			
	_____ = Total Cover		
Sapling/Shrub Stratum (Plot size: 2m)			
1. Ricinus communis	3	N	FACU
2.			
3.			
4.			
5.			
	_____ = Total Cover		
Herb Stratum (Plot size: 1m)			
1. Bromus diandrus	90	Y	NL
2. Erodium moschatum	1	N	NL
3. Oxalis pes-caprae	1	N	NL
4.			
5.			
6.			
7.			
8.			
	92 = Total Cover		
Woody Vine Stratum (Plot size: _____)			
1. N/A			
2.			
	_____ = Total Cover		

% Bare Ground in Herb Stratum 8 % Cover of Biotic Crust _____

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across All Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0 (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:	
OBL species _____	x 1 =	_____
FACW species _____	x 2 =	_____
FAC species _____	x 3 =	_____
FACU species 3	x 4 =	12
UPL species 92	x 5 =	460
Column Totals: 95 (A)		472 (B)

Prevalence Index = B/A = 4.96

Hydrophytic Vegetation Indicators:

___ Dominance Test is >50%

___ Prevalence Index is ≤3.0[1]

___ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes _____ No X

Remarks:

SOIL

Sampling Point: DS2

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0-16	7.5YR 3/3	100	N/A				Sandy loam	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5) (**LRR C**)
- ___ 1 cm Muck (A9) (**LRR D**)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)
- ___ Vernal Pools (F9)

Indicators for Problematic Hydric Soils[3]:

- ___ 1 cm Muck (A9) (**LRR C**)
- ___ 2 cm Muck (A10) (**LRR B**)
- ___ Reduced Vertic (F18)
- ___ Red Parent Material (TF2)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes _____ No X

Remarks: Soil is very loose - examined in-situ. Some trash & debris mixed in the soil (bricks, wire, glass). Reddish minerals appear to be brick fragments.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1) (**Nonriverine**)
- ___ Sediment Deposits (B2) (**Nonriverine**)
- ___ Drift Deposits (B3) (**Nonriverine**)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Water-Stained Leaves (B9)
- ___ Salt Crust (B11)
- ___ Biotic Crust (B12)
- ___ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water Marks (B1) (**Riverine**)
- ___ Sediment Deposits (B2) (**Riverine**)
- ___ Drift Deposits (B3) (**Riverine**)
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present? Yes _____ No X Depth (inches): _____

Water Table Present? Yes _____ No X Depth (inches): _____

Saturation Present? (includes capillary fringe) Yes _____ No X Depth (inches): _____

Wetland Hydrology Present? Yes _____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

No evidence of hydrology.

Arid West Ephemeral and Intermittent Streams OHWM Datasheet

Project: 601 Garden St. **Date:** 1/2/19 **Time:**
Project Number: **Town:** Santa Barbara **State:**
Stream: Unnamed storm drain ditch **Photo begin file#:** **Photo end file#:**
Investigator(s): R. Mahan

Y ☒ / N ☐ Do normal circumstances exist on the site?

Y ☐ / N ☒ Is the site significantly disturbed?

Location Details: OHWM DS 1

Projection: **Datum:**
Coordinates:

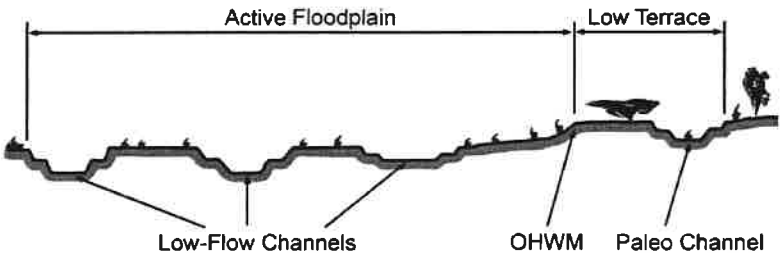
Potential anthropogenic influences on the channel system:
Storm drain subject to runoff & other inputs from surrounding built environment. Homeless encampments appear to have altered the bed material in multiple locations.

Brief site description:
Storm drain b/t developed property & Garden St. Variable overall depth of ditch, generally 2' at northern end, up to 10'-11' at the southern end. Enters a culvert which presumably flows into the storm sewer system.

Checklist of resources (if available):

- ☒ Aerial photography
  Dates:
- ☐ Topographic maps
- ☐ Geologic maps
- ☐ Vegetation maps
- ☐ Soils maps
- ☐ Rainfall/precipitation maps
- ☐ Existing delineation(s) for site
- ☐ Global positioning system (GPS)
- ☐ Other studies
- ☐ Stream gage data
  Gage number:
  Period of record:
- ☐ History of recent effective discharges
- ☐ Results of flood frequency analysis
- ☐ Most recent shift-adjusted rating
- ☐ Gage heights for 2-, 5-, 10-, and 25-year events and the most recent event exceeding a 5-year event

Hydrogeomorphic Floodplain Units

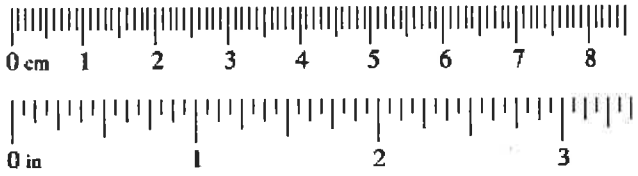


Procedure for identifying and characterizing the floodplain units to assist in identifying the OHWM:

1. Walk the channel and floodplain within the study area to get an impression of the geomorphology and vegetation present at the site.
2. Select a representative cross section across the channel. Draw the cross section and label the floodplain units.
3. Determine a point on the cross section that is characteristic of one of the hydrogeomorphic floodplain units.
   a) Record the floodplain unit and GPS position.
   b) Describe the sediment texture (using the Wentworth class size) and the vegetation characteristics of the floodplain unit.
   c) Identify any indicators present at the location.
4. Repeat for other points in different hydrogeomorphic floodplain units across the cross section.
5. Identify the OHWM and record the indicators. Record the OHWM position via:
   - ☐ Mapping on aerial photograph
   - ☐ Digitized on computer
   - ☒ GPS
   - ☐ Other:

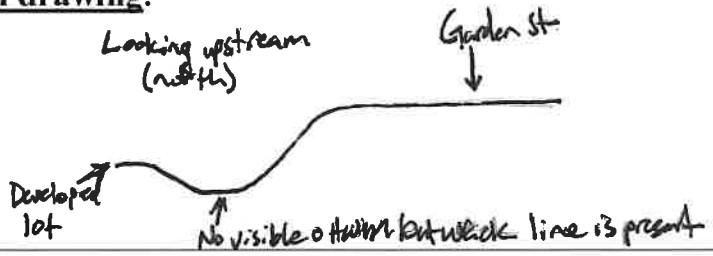
Wentworth Size Classes

Inches (in)	Millimeters (mm)	Wentworth size class	
10.08	256	Boulder	
		Cobble	Gravel
2.56	64	Pebble	
0.157	4	Granule	
0.079	2.00	Very coarse sand	
0.039	1.00	Coarse sand	
0.020	0.50	Medium sand	Sand
1/2 0.0098	0.25	Fine sand	
1/4 0.005	0.125	Very fine sand	
1/8 0.0025	0.0625	Coarse silt	
1/16 0.0012	0.031	Medium silt	
1/32 0.00061	0.0156	Fine silt	Silt
1/64 0.00031	0.0078	Very fine silt	
1/128 0.00015	0.0039	Clay	Mud



Project ID: **Cross section ID:** **Date:** 1/2/19 **Time:**

Cross section drawing:



OHWM

GPS point: _____

Indicators:

- ☐ Change in average sediment texture
- ☐ Change in vegetation species
- ☐ Change in vegetation cover
- ☐ Break in bank slope
- ☐ Other: _____
- ☐ Other: _____

Comments:

Feature closely resembles a swale that is composed of soft sediments, leaf litter/vegetation & trash & debris. No ohwm indicators observed with the exception of a wrack line & water marks - ~3' wide

Floodplain unit: ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace

GPS point: _____

Characteristics of the floodplain unit:

Average sediment texture: _____

Total veg cover: _____ % Tree: 0 % Shrub: 50 % Herb: 60 %

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☒ Mid (herbaceous, shrubs, saplings)
- ☐ Late (herbaceous, shrubs, mature trees)

Indicators:

- ☐ Mudcracks
- ☐ Ripples
- ☐ Drift and/or debris
- ☐ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

Comments:

Vegetation is largely upland adapted. See wetland delineation sampling forms.

Project ID: **Cross section ID:** **Date:** **Time:**

Floodplain unit: ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace

GPS point: _____

Characteristics of the floodplain unit:

Average sediment texture: _____

Total veg cover: _____ % Tree: _____ % Shrub: _____ % Herb: _____ %

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☐ Mid (herbaceous, shrubs, saplings)
- ☐ Late (herbaceous, shrubs, mature trees)

Indicators:

- ☐ Mudcracks
- ☐ Ripples
- ☐ Drift and/or debris
- ☐ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

Comments:

N/A

Floodplain unit: ☐ Low-Flow Channel ☐ Active Floodplain ☐ Low Terrace

GPS point: _____

Characteristics of the floodplain unit:

Average sediment texture: _____

Total veg cover: _____ % Tree: _____ % Shrub: _____ % Herb: _____ %

Community successional stage:

- ☐ NA
- ☐ Early (herbaceous & seedlings)
- ☐ Mid (herbaceous, shrubs, saplings)
- ☐ Late (herbaceous, shrubs, mature trees)

Indicators:

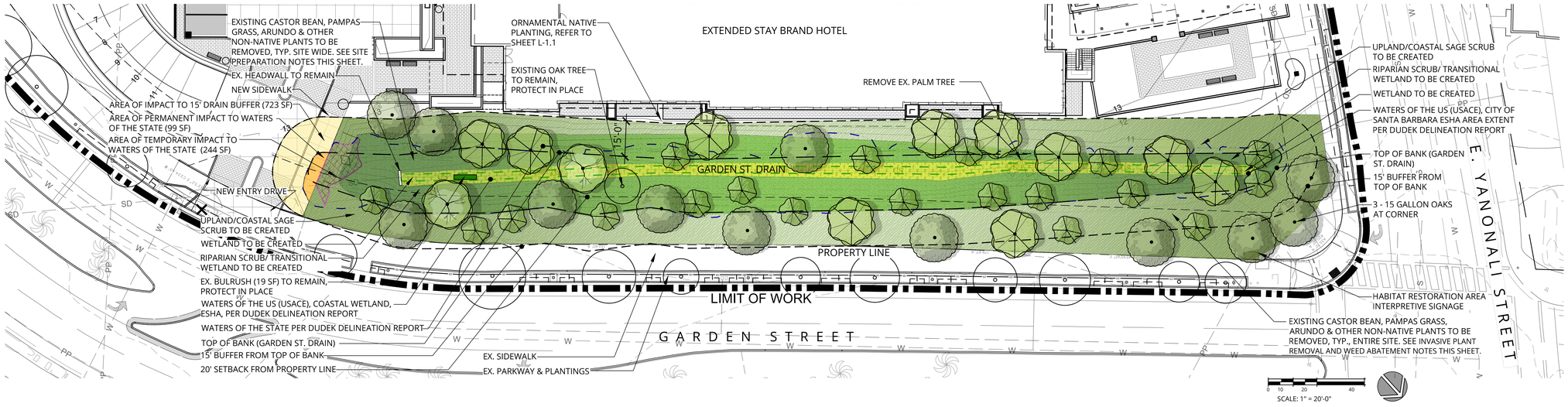
- ☐ Mudcracks
- ☐ Ripples
- ☐ Drift and/or debris
- ☐ Presence of bed and bank
- ☐ Benches
- ☐ Soil development
- ☐ Surface relief
- ☐ Other: _____
- ☐ Other: _____
- ☐ Other: _____

Comments:

N/A

Attachment D

Habitat Restoration Plan



GARDEN STREET DRAIN PRELIMINARY HABITAT RESTORATION PLAN

SITE PREPARATION

The site contains an unnamed drainage feature which daylights from a stormdrain pipe onto the site at the at the northerly corner of the parcel at the corner of E. Yannonali Street and Garden streets, and flow southeasterly across the property, where it exits the site at an existing headwall and storm drain culvert, which ultimately connects to the Laguna Channel and Pacific Ocean. For the purposes of this restoration plan, the unnamed drainage feature will be called the Garden Street Drain. Currently the drainage channel is characterized by vegetation dominated by exotic non-native and invasive plants and ruderal vegetation. A complete survey was completed by the Project Biologist (Dudek). Currently native vegetation is 19 SF of Bulrush and one coast live oak (437 SF).

Site preparation for habitat restoration areas at the Garden Street Drain will include removal of existing non-native, invasive plants, removal of trash and debris, and potential minor re-contouring of the channel to facilitate implementation of the Habitat Restoration Plan (HRP). Construction of the hotel access driveway and sidewalk is estimated to permanently impact 99 SF and temporarily impact 244 SF of area below Top of Bank of the Drain and within edge of riparian canopy (non-native riparian) classified as Waters of the State, and 763 SF of the 15' Top of Bank Buffer. Existing area classified as Coastal Wetland / ESHA/ Waters of the US will not be impacted by the proposed development. The existing native and ruderal vegetated area is 22,386 SF; proposed habitat restoration area will be 22,569 SF with a net creation of new native habitat area of 14,716 SF. Of the new native habitat, 8,816 SF will be riparian habitat, for a net increaseof 1,419 SF over the mostly non-native existing riparian habitat.

INVASIVE PLANT REMOVAL AND WEED ABATEMENT

Garden Street Drain currently contains dense stands of Castor Bean, Pampas Grass, Yucca, Smilo Grass, and various non-native grasses and forbs, including mustard and tree tobacco, in addition to one Canary Island Palm, *Phoenix canariensis*. One (1) native Coast Live Oak, *Quercus agrifolia*, exists in the channel and will remain and be protected during construction.

Initial weed abatement treatments to include removal of all non-native plant species by mechanical, manual, and aquatic approved herbicides for the channel and upland banks. Arundo and Castor Bean may require manual cut back, herbicide treatment, and mechanical removal of surface roots/stumps to facilitate HRP implementation and avoid re-sprout of these tenacious species. Other mechanical treatments such as weed whipping, hand pulling may be employed. All materials shall be removed from the restoration areas and disposed of off-site in a legal manner.

A minimum of two (2) grow-kill cycles (treating weeds, allowing them to germinate and grow, and treating them again) shall occur on site. Weed removal during grow-kill cycles will primarily be conducted by hand-pulling and mechanical means. Spot applications of appropriate herbicides will be used to supplement hand-pulling and mechanical weed removal, as necessary, under the direction of the Project Restoration Manager. Herbicide application will target highly invasive species (e.g., castor bean, arundo, tree tobacco).

Trash and debris, such as scrap metal, concrete, trash, etc., shall be removed by the contractor and disposed of off-site in a legal manner. Once the site has been cleared of non-native vegetation and trash, minor land contouring shall occur to create smooth even grades which drain to the existing channel.

EROSION CONTROL

The cleared banks shall have a biodegradable coconut fiber/hemp rope erosion control blanket (no plastic materials) rated for 24 months applied to the surface, and fiber rolls placed as required at 20' intervals per methods prescribed by the Civil Engineer. Erosion control blankets shall be applied to the drainage channels and extend up over the top of bank by at least 5 feet, and secured, with 12" overlap. Work shall be performed by the Grading or Landscape Contractor. Erosion control measures shall be installed within 5 days of site clearing, unless rain is predicted, then it shall be installed prior to a forecast of 50% or greater chance of rain. All flat upland areas shall be initially mulched with a minimum four to six (4"-6") layer of wood chip mulch free of weed seed, trash, and debris.

HABITAT RESTORATION PLANT PALETTE

Refer to the Habitat Restoration Plant List, this sheet, for the complete list of container plants proposed for the HRP. Restoration efforts will focus on establishment of native vegetation communities to increase habitat value, improve ecosystem function, and support a wider diversity of plant and wildlife. All plants proposed are native to the south coast of Santa Barbara County, and shall be propagated from locally sourced genetic material obtained from local south coast watersheds from Gaviota to Rincon, and from the Mission Creek and Sycamore Creek watersheds where available. The plant palette includes species to create a complex ecosystem structure of trees, shrubs, and herbaceous plants.

Wetland plants are proposed at toe of slope at approximately the 9' elevation contour. Riparian Scrub / Transitional Wetland plants are proposed on the banks from approximately the 9' to 10' contour elevations up to the outer edge of top of bank. The Upland Coastal Sage Scrub plants occur in the Wetland Buffer and areas outside of the buffer.

Container plants will be installed in the Emergent Wetland Riparian Scrub-Transitional Upland, and Upland Coastal Sage Scrub restoration areas in fall/winter, following site preparation. The Upland Coastal Sage Scrub may also be supplemented via hand-broadcast seed application following plant installation to aid in soil stabilization and promote native plant germination while container plants mature. Cutting installation of Arroyo Willow will occur within the Riparian Scrub-Transitional upland restoration area along the banks of the Garden Street Drain. Container plantings are recommended for all three restoration zones because container plantings tend to become established more readily and are more successful at competing with the nonnative seed bank, and a thick layer of mulch may be applied around them to control erosion and suppress weed growth.

PLANT INSTALLATION

Container plants and cuttings shall be planted in fall/early winter to take advantage of winter rainfall. Planting should be performed by the Landscape Contractor, under the supervision of the Project Restoration Manager or Biologist, to ensure proper spacing and clustering, and increase likelihood of survivorship. All container-grown plants shall be placed by hand in a planting hole that is at least two times the diameter and 4 to 6 inches deeper than the container the plant was grown in. A backfill mix with mycorrhizal fungi and slow release organic fertilizer with humate, or a tablet containing those elements, will be used in each planting hole.

IRRIGATION

A temporary drip irrigation system for uplands and overhead spray system for banks will be used to irrigate and establish the restoration zones. The area within 15' of the building, or as required by the Fire Department, will be permanently irrigated. The temporary irrigation systems will be used during the first and second years to ensure successful germination and plant establishment. Frequency of irrigation will depend on water availability, climatic conditions, and soil moisture, and may be adjusted as needed by the Project Restoration Manager or Landscape Contractor. Both the overhead system and drip irrigation should utilize a programmable irrigation controller with a flow sensor to detect leaks. Irrigation systems shall be installed and tested prior to installation of 4" to 6" layer of wood chip mulch.

New plantings will be watered two to three times a week for the first three months after installation. After the initial three-month period, watering frequency should be reduced to one to two times per week or until seasonal rainfall provides sufficient moisture. Watering will be gradually decreased the second year after planting at the discretion of the Project Restoration Manager, Biologist, or Landscape Architect. Irrigation may continue in the third year after planting if drought conditions exist or if determined necessary by the Project Restoration Manager, Biologist, or Landscape Architect.

MAINTENANCE

The restoration zones will be maintained for a period of 5 years, or until success criteria and performance standards have been attained. Maintenance activities performed during this period will include weed eradication, irrigation, trash removal, supplemental planting or plant replacement (as necessary), and maintenance of erosion control materials.

Remove weeds via mechanical or chemical means to control non-native species. Weeding shall occur bi-monthly during the rainy season (November to April), and monthly thereafter during the first two years. Weeding may be reduced in years three on to once or twice a month, as required, to meet performance standards.

Some plant mortality is expected, and dead plants shall be replaced like in kind with same size and species during the first three years, unless determined differently by the Project Restoration Manager/Biologist.

All erosion control methods shall be routinely inspected and repaired if needed. Mulch shall be reapplied annually.

MONITORING AND REPORTING

The Project Restoration Manager will oversee the monitoring and reporting program throughout the 5-year maintenance period or until success criteria have been satisfied and the Project is considered complete. City Creeks Division Staff and the Project Restoration Manager shall perform an inspection of the restoration areas after initial installation is complete and annually thereafter for the 5-year maintenance period.

The monitoring program will include oversight during the remediation, site preparation, seeding/planting, and maintenance phases of the Project. A combination of quantitative and qualitative methods will be used to evaluate progress toward attainment of habitat restoration goals and objectives. The following criteria will be used to evaluate progress toward restoration goals and objectives:

- Native plant diversity.
- Mortality of native plantings (qualitative).
- Health and vigor of native plantings (qualitative).
- Size of native plantings (quantitative).
- Percent cover native and non-native vegetative cover (annual quantitative surveys)
- Percent of bare ground (annual quantitative surveys)
- Evidence of native plant recruitment.
- Evidence of erosion.
- Evidence of wildlife usage.
- Need for implementation of adaptive management strategies (e.g., plant protection, erosion control, reseeding, additional planting, and additional weed control).

MONITORING METHODS

A monitoring log will be kept by the Project Restoration Manager. Monitoring logs will include details regarding timing and nature of weed control efforts, erosion control maintenance, germination and establishment of native species, description of problems encountered, and adaptive management techniques employed to resolve the problems.

Annual quantitative surveys will include identification of approximate percent cover of vegetation within the restoration areas utilizing vegetation relevés following CNPS protocol (CNPS 2009) and/or a line-transect method with a one-meter squared quadrat or point-intercept sampling technique (as described in A Manual of California Vegetation, Sawyer and Keeler- Wolf, 1995). Annual sampling should occur in late-spring or early summer (April-June) when annual species are identifiable. Annual quantitative surveys will also include measurements of tree diameter at breast height (DBH) for all planted native trees to track growth over the 5-year monitoring period.

Qualitative surveys will include an inventory of plant species throughout the restoration areas, evaluation of the overall health/vigor of plantings, visual estimation of the percent cover of native and non-native species, and evidence of functional value (i.e., use of habitat by wildlife, etc.).

REPORTING REQUIREMENTS

An annual report shall be performed each year, and shall describe the work completed, summarize maintenance activities, and discuss monitoring results. The annual report will be submitted to the regulatory agencies by December 31 for each year of the Project (five annual reports.

Photographs will be taken from established photo-points during each phase of the Project (e.g., site preparation, planting, maintenance). Photo-points will be noted on graphics submitted with the annual reports. Annual monitoring reports shall clearly state whether the restoration areas are meeting success criteria, the number of container plantings that died (if any), the number of container plantings that were replaced (if any), and adaptive management strategies implemented throughout the year (e.g., installation of caging to prevent herbivory, replanting, addition of mulch, etc.).

A final monitoring report will be submitted at the end of Year 5, or when success criteria have been achieved. The final report will include the information outlined above for Years 2, 3, and 4, as well as an evaluation of whether the restoration areas have met the goals and objectives of the HRP.

SUCCESS CRITERIA

The qualitative and quantitative monitoring methods described above will be used to evaluate progress toward attainment of the restoration goals and objectives. In general, the goal of this HRP is to improve ecosystem function and habitat value for native plants and wildlife, with significantly reduced cover of weeds. Success criteria are designed to measure progress toward this goal. The success criteria are summarized below. Non-native annual grasses that are listed as naturalized by the Jepson Herbarium E-flora (University of California 2016) and not ranked as highly invasive by the California Invasive Plant Council (Cal-IPC 2017) will not be considered in the total weed cover (e.g., *Avena* sp., *Bromus diandrus, Hordeum* sp.).

Performance criteria for the initial planting effort are as follows: 85% survival one year after planting, 90% survival of remaining plants two years after planting, 95% survival of remaining plants three years of planting.

Relative cover of native/naturalized species shall be 20% by Year 2, 25% by Year 3, 50% by Year 4, and 80% by Year 5.

Invasive weed control: Cover by targeted invasive plant species shall be less than 10% for Years 1 and 2. After Year 2, the cover by targeted invasive plant species shall be less than 5%, including all woody, perennial invasive species. Targeted invasive plant species do not include annual grasses that are not considered highly invasive by Cal-IPC.

ADAPTIVE MANAGEMENT

Adaptive management is a process for improving restoration success and/or dealing with unexpected outcomes and natural events that occur (e.g., severe storms, drought). It is often difficult to anticipate negative influences on restoration success, but contingency measures can be implemented to address commonly encountered problems such as herbivory, erosion, aggressive weed invasion, low germination success, or massive plant die-off.

Potential contingencies include the following:

- Protective cages for container plantings to prevent herbivory by gophers or other rodents;
- Aggressive control of gopher and rodents via trapping or installation of raptor perches;
- Repair and/or replace erosion control materials;
- Increased frequency of weed removal events;
- Reseeding and replanting to increase native cover; and,
- Adjustments to frequency of irrigation and placement of overhead rotors and/or drip line.

HABITAT RESTORATION PLANT LIST

TREES	CODE	QTY	BOTANICAL NAME	COMMON NAME	CONT	WATER USE	
	PLA R15	10	Platanus racemosa	California Sycamore	15 gal	Medium	
	POP BAL	2	Populus balsamifera trichocarpa	Black Cottonwood	5 gal	Medium	
	QUE AG1	12	Quercus agrifolia	Coast Live Oak	1 gal (3) 15 gal	Low	
	SAM CAE	19	Sambucus nigra caerulea	Blue Elderberry	5 gal	Low	
SHRUB AREAS	**CODE**	**QTY**	**BOTANICAL NAME**	**COMMON NAME**	**CONT**	**WATER USE**	**SPACING**
		1,998 sf	WETLAND (TO BE CREATED)				
	CAR PRA	231	Carex praegracilis	California Field Sedge	4"pot	Medium	25% @ 18" o.c.
	DIS SPI	924	Distichlis spicata	Saltgrass	72 cell plugs	Low	25% @ 9" o.c.
	ELY AL2	416	Elymus triticoides	Alkali Rye	4" Pots or Tubes	Low	20% @ 12" o.c.
	JUN PAT	185	Juncus patens	California Gray Rush	1 gal	Low	20% @ 18" o.c.
	SCH AME	52	Schoenoplectus americanus	Three-square Bulrush	1 gal	High	10% @ 24" o.c.
		8,816 sf	RIPARIAN SCRUB / TRANSITIONAL WETLAND (TO BE CREATED)				
	ART DOU	204	Artemisia douglasiana	Mugwort	1 gal	Low	20% @ 36" o.c.
	BAC SAL	58	Baccharis salicifolia	Mulefat	1 gal	Low	10% @ 48" o.c.
	CAL CYC	29	Calystegia macrostegia cyclostegia	Coast Morning Glory	1 gal	Low	5% @ 48" o.c.
	CLE LIG	29	Clematis ligusticifolia	Western White Clematis	1 gal	Low	5% @ 48" o.c.
	ROS CAL	74	Rosa californica	California Wild Rose	1 gal	Low	20% @ 60" o.c.
	RUB URS	51	Rubus ursinus	California Blackberry	1 gal	Low	20% @ 72" o.c.
	SAL EXI	13	Salix exigua	Coyote Willow	1 gal	High	5% @ 72" o.c.
	SAL LAS	18	Salix lasiolepis	Arroyo Willow	1 gal	High	12% @ 96" o.c.
	SCR CAL	69	Scrophularia californica	California Figwort	1 gal	Low	3% @ 24" o.c.
		11,755 sf	UPLAND COASTAL SAGE SCRUB (TO BE CREATED)				
	ACM DEE	68	Acmispon glaber	Deerweed	1 gal	Low	5% @ 36" o.c.
	ART CAL	50	Artemisia californica	California Sagebrush	1 gal	Low	5% @ 42" o.c.
	ASC FAS	39	Asclepias fascicularis	Narrowleaf Milkweed	1 gal	Low	5% @ 48" o.c.
	BAC CON	11	Baccharis pilularis consanguinea	Coyote Brush	1 gal	Low	3% @ 72" o.c.
	BRO CAR	611	Bromus carinatus	California Brome	72 cell plugs	Low	5% @ 12" o.c.
	DIS SP2	2,172	Distichlis spicata	Saltgrass	72 cell plugs	Low	10% @ 9" o.c.
	ELY CON	28	Elymus condensatus	Giant Wild Rye	1 gal	Low	2% @ 36" o.c.
	ELY AL3	611	Elymus triticoides	Alkali Rye	4" Pots or Tubes	Low	5% @ 12" o.c.
	ENC CAL	50	Encelia californica	California Encelia	1 gal	Low	5% @ 42" o.c.
	ERI PAR	68	Eriogonum parvifolium	Cliff Buckwheat	1 gal	Low	5% @ 36" o.c.
	ERI CON	153	Eriophyllum confertiflorum	Golden Yarrow	1 gal	Low	5% @ 24" o.c.
	FRA CA3	25	Frangula californica	California Coffeeberry	1 gal	Low	5% @ 60" o.c.
	HET AR2	17	Heteromeles arbutifolia	Toyon	1 gal	Low	5% @ 72" o.c.
	ISO MNZ	50	Isocoma menziesii menziesii	Menzie's Goldenbush	1 gal	Low	5% @ 42" o.c.
	MIM AUR	68	Mimulus aurantiacus	Sticky Monkeyflower	1 gal	Low	5% @ 36" o.c.
	MUH RIG	39	Muhlenbergia rigens	Deer Grass	1 gal	Low	5% @ 48" o.c.
	RHU INT	17	Rhus integrifolia	Lemonade Berry	1 gal	Low	5% @ 72" o.c.
	SAL LEU	25	Salvia leucophylla	Purple Sage	1 gal	Low	5% @ 60" o.c.
	STI PUL	306	Stipa pulchra	Purple Needle Grass	3" plugs	Low	10% @ 24" o.c.

GARDEN STREET DRAIN PRELIMINARY HABITAT RESTORATION PLAN

PLAN PREPARED BY KIMBERLY TRUE, MLA, ASLA, TRUE NATURE UNDER CONSULTATION OF DUDEK. DUDEK WILL PREPARE FULL ASSESSMENT AND FINAL HABITAT RESTORATION PLAN.

RESPONSIBLE PARTY:

DAUNTLESS DEVELOPMENT
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Santa Monica, CA 90404
Shaun Gilbert
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DELINEATION LINE KEY:

- COASTAL WETLAND / ESHA / USACE WATERS OF THE US
- WATERS OF THE STATE
- TOP OF BANK
- 15' BUFFER FROM TOP OF BANK

Table 1: Summary of Habitat Types

Vegetation Community	Existing SF	Proposed Native Habitat Area SF	Net Habitat Creation SF
Non-native (ruderal)	14,533	0	0
Wetland (Native)	19	1,998	1,979
Riparian / Transitional (Ex. Is Non native, Arundo etc.)	7397	8,816	1,419
Native Upland / Coastal Sage Scrub (Ex. Is Oak)	437	11,755	11,318
TOTAL:	22,386	22,569	14,716

Table 2: Summary of Habitat Impacts & Mitigation

Vegetation Community	Area Impacted SF	Mitigation Ratio Required SF	Mitigation Area Required SF	Net Habitat Restoration Area Proposed SF
Coastal Wetland	0	N/A	N/A	N/A
Waters of the State, Permanent	99	5:1	495	1,419
Waters of the State, Temporary	244	3:1	732	1,419
15' Drain Buffer	763	N/A	N/A	N/A
Total impacted area requiring mitigation	343		1,227	1,419
Native Riparian/Transitional habitat type proposed for Required Mitigation				

GARDEN STREET HOTEL

CLIENT / DEVELOPER:

DAUNTLESS DEVELOPMENT
101 GARDEN STREET
SANTA BARBARA, CA 93101

CLIENT: D5 PARTNERS LLC
DEVELOPER: DAUNTLESS DEVELOPMENT

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ARCHITECT OF RECORD:

delawie
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REVISIONS

#	DATE	DESCRIPTION
	11/9/21	DART
	02/22/22	DART #2
	05/11/22	HLC
	05/20/22	DART #3
	08/05/22	DART #4
	09/08/22	DART #4

SHEET TITLE:

PRELIMINARY HABITAT RESTORATION PLAN

SHEET NUMBER:

L-1.2