

**From:** [Andy Newkirk](mailto:andy.newkirk@cityofgoleta.org)  
**To:** [Andy Newkirk \(anewkirk@cityofgoleta.org\)](mailto:andy.newkirk@cityofgoleta.org)  
**Subject:** FW: Goleta City NZO and Wetland Mitigation  
**Date:** Monday, May 13, 2019 12:45:00 PM

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**From:** Brian Trautwein <[btrautwein@environmentaldefensecenter.org](mailto:btrautwein@environmentaldefensecenter.org)>  
**Sent:** Monday, May 13, 2019 12:16 PM  
**To:** Anne Wells <[awells@cityofgoleta.org](mailto:awells@cityofgoleta.org)>  
**Cc:** Tara Messing <[tmessing@environmentaldefensecenter.org](mailto:tmessing@environmentaldefensecenter.org)>  
**Subject:** Goleta City NZO and Wetland Mitigation

Dear Anne,

I wanted to call your attention to the NZO revisions in Section 17.30.110 which specify a 3:1 maximum and a 2:1 minimum mitigation ratio for fill of wetlands in the coastal zone and inland area. The California Coastal Commission requires **4:1 minimum** for wetlands, as evidenced by the Gaviota Plan and Eastern Goleta Valley Community Plan. For example, see the California Coastal Commission's Suggested Modification #2 to the Gaviota Plan, Policy NS-11: Restoration (Coastal) below:

**Policy NS-11: Restoration.** (COASTAL) In cases where adverse impacts to biological resources as a result of new development cannot be avoided and impacts have been minimized, restoration shall be required. A minimum replacement ratio of 3:1 shall be required to compensate for adverse impacts to native habitat areas or biological resources, **except that mitigation for impacts to wetlands shall be a minimum 4:1 ratio.** Where onsite restoration is infeasible, the most proximal and in-kind offsite restoration shall be required. Preservation in perpetuity for conservation and/or open space purposes of areas subject to restoration shall be required as a condition of the CDP and notice of such restriction shall be provided to property owners through a recorded deed restriction or Notice to Property Owner.

Just wanted to flag this issue as an FYI. Please let us know if you have any questions.

Thank you,  
Brian

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