CHAPTER 5
IMPACTS FOUND NOT TO BE SIGNIFICANT

This chapter describes the rationale for impacts found not to be significant and thus not analyzed further in Chapter 4.

Note: After the Draft EIR was released, the applicant chose to remove the car wash facilities from the Project site, and use of the car wash area is no longer part of the proposal. All references to future use of the car wash area have been removed from the project description and the impact analysis.

5.1 AGRICULTURE AND FORESTRY RESOURCES

The Project site does not contain agriculture or forestry resources, nor are any present in the surrounding area. Thus, **no impacts** would occur.

5.2 AIR QUALITY

Air emissions would occur only during construction. Quantitative thresholds of significance are not currently in place for short-term construction emissions. However, short-term impacts such as exhaust emissions from construction equipment and fugitive dust generation during grading must be discussed. The Santa Barbara County Air Pollution Control District (SBCAPCD) recommends that construction-related emissions of oxides of nitrogen (NO_X), reactive organic compounds (ROC), and particulate matter smaller than 10 and 2.5 microns, respectively (PM_{10} and $PM_{2.5}$) from diesel- and gasoline-powered equipment, paving, and other activities be quantified. SBCAPCD uses 25 tons per year for NO_X and ROC as a guideline for determining the significance of construction impacts.

SBCAPCD Rule 345 regulates generation of visible fugitive dust emissions at demolition and construction sites. Section 6 of their guidance document, *Scope and Content of Air Quality Sections in Environmental Documents* (SBCAPCD 2015) also includes dust control measures required for all projects involving earthmoving activities regardless of the project size or duration. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions. Implementation of SBCAPCD's required standard dust control measures, therefore, would result in **less-than-significant** (Class III) fugitive dust emissions.

The Project's construction emissions were calculated by using the California Emissions Estimator Model (CalEEMod) Version 2013.2.2 air quality modeling software, which is the most current version available. The results are shown in Table 5-1 and are included in Appendix G. As shown, construction emissions would be well under 25 tons per year, and impacts would be **less than significant (Class III)**.

Table 5-1 Construction Emissions (tons per year)

	ROC	NO_x	CO	Total PM_{10}	Total $PM_{2.5}$	Total Emissions
Project Emissions	0.0135	0.1246	0.0925	0.0124	0.00936	0.25236
Threshold	25	25	None	None	None	None
Threshold Exceeded?	No	No	No	No	No	No

Notes:

ROC = reactive organic compounds; NOx = oxides of nitrogen; CO = carbon monoxide;
PM_{10} = particulates smaller than 10 micrograms; $PM_{2.5}$ = particulates smaller than 2.5 micrograms

Source: CalEEMod v.2013.2.2

5.3 ENERGY CONSERVATION

The Project requires minimal construction, limited to 21 work days and involving four to six construction workers. The only energy consumed would be fuel for construction equipment. The Project would not generate a long-term demand for energy. Thus, any impacts associated with energy consumption would be short-term and **less than significant (Class III)**.

5.4 GREENHOUSE GAS EMISSIONS

The City of Goleta does not have established thresholds of significance for greenhouse gas (GHG) emissions, but for this Project, has adopted the thresholds established by the Bay Area Air Quality Management District (BAAQMD).[1] For this Project, a significant impact related to GHGs would occur if the Project would:

1. Exceed the daily significance threshold adopted by the BAAQMD; i.e., 1,100 metric tons of carbon dioxide equivalent emissions per year (CO_2e/year) for occupational GHG emissions and/or result in significant GHG emissions based on a qualitative analysis.
2. Fail to employ reasonable and feasible means to minimize GHG emissions from a qualitative standpoint, in a manner consistent with the goals and objectives of Assembly Bill (AB) 32, which is implemented through the City's 2014 Climate Action Plan.

Construction-related emissions were estimated to be generated from heavy-duty construction equipment and on-road vehicle exhaust emissions as well as the removal and addition of vegetation. Occupational emissions, which result from activities such as resident and visitor vehicle trips to and from the Project, would not be generated.

GHG emissions from construction activities were calculated using CalEEMod Version 2013.2.2 (Appendix G). No specific threshold has been established for construction emissions, but the Project would generate approximately 12.1079 metric tons of CO_2e during the entire construction period, which is well under the threshold for long-term emissions shown under Criterion 1 above. Additionally, following completion of the Project, construction-related GHG emissions would cease. Therefore, these emissions would be minor and temporary and would not be inconsistent with the City's Climate Action Plan. Impacts from GHG would be **less than significant (Class III)**.

[1] Use of the BAAQMD threshold does not imply that it is a threshold that the City of Goleta has formally adopted, or should adopt, as a GHG significance threshold for all present or future Project analyses.

Table 5-2 GHG Construction Emissions (metric tons per year)

	CO_2e/
Project Emissions	12.1079
Threshold	1,100.00
Threshold Exceeded?	No

Source: CalEEMod v.2013.2.2

5.5 HAZARDS AND HAZARDOUS MATERIALS

Construction would require the use of common hazardous materials, such as diesel fuel. As discussed in Chapter 2, staging, equipment refueling, and materials storage all would occur in one central area in accordance with the provisions of California Stormwater Quality Association (CASQA) BMP Fact Sheets NS-8, Vehicle & Equipment Cleaning; NS-9, Vehicle & Equipment Fueling; NS-10, Vehicle & Equipment Maintenance; and WM-1, Material Delivery and Storage. This area may change throughout construction, depending on where activities take place, but it would not be located near a storm drain inlet or drainage swale, or adjacent to a fill slope. The area would be inspected frequently to ensure no spilled hazardous materials contaminated the existing ground. Should this occur, the spill would be cleaned up immediately, in accordance with CASQA BMP Fact Sheet WM-4, Spill Prevention and Control and applicable accepted standards and procedures of local governmental agencies.

Because appropriate procedures would be implemented both to prevent accidental releases of hazardous materials and to clean up any spills that occurred, the Project would not create a hazard to the public or environment through the routine transport, use, or disposal of hazardous materials, or otherwise cause a public hazard. The Project site is within 2 miles of Santa Barbara Municipal Airport, but this would not pose an undue hazard to construction workers, and impacts would be **less than significant (Class III)**; nor would the limited construction involved affect any adopted emergency response plans or evacuation plans. The Project would improve public safety by providing fire protection improvements at Rancho ~~Goleta~~Estates, and any adverse impacts would be **less than significant (Class III)**.

5.6 MINERAL RESOURCES

The Project site includes an existing mobile home park, a narrow strip between a creek identified as an Environmentally Sensitive Habitat Area (ESHA), and a developed residential neighborhood. It does not contain mineral resources, and **no impacts** would occur.

5.7 POPULATION AND HOUSING

The Project would not affect population and housing. Construction would require only four to six workers, who would be readily available from the local labor pool, and no housing would be lost or gained. **No impacts** would occur.

5.8 RECREATION

A recreational trail is located on the strip of land where the emergency access road would be located. Access to this portion of the trail would be precluded during construction, but appropriate signage would be used to notify those using the trail of the temporary closure, and the trail connects with other trails both east and west of the Project site so that access to different parts

of the open space area would be preserved. While vehicular traffic would not be allowed on the access road, pedestrian and bicycle access would be regained once construction was complete.

Habitats associated with Devereux Creek are regularly used for birdwatching, and the existing trail along the proposed emergency access route (approximately 500 feet long) provides an easy birdwatching location at the northern edge of the riparian corridor. Existing trails through the riparian corridor also provide numerous birdwatching opportunities adjacent to the project site as well as throughout the area. Construction activities adjacent to the creek would be brief (lasting only from 8 AM to 5 PM on Monday through Friday for 21 work days). Therefore, the period when birds would be expected to avoid areas adjacent to the site due to construction disturbances would also be brief. The Project site comprises only a small portion of the Devereux Creek corridor, and it is adjacent to a large open space area. Therefore, birds displaced by construction activities would be expected to relocate to nearby areas, where birdwatching could continue unimpeded. No habitat disturbance would occur directly off the end of Coronado Drive or to the west in the vicinity of the Coronado Seep.

Although nine trees would be removed during construction, these trees do not extend the entire length of the proposed, approximately 500-foot-long, access road. Four of the willows and the oaks are located within an approximately 90-foot span, and the other willow is isolated, located about 100 feet to the east. The one sycamore tree to be removed is isolated between the existing trail and the housing fence line. Because these trees are adjacent to an existing pedestrian and bicycle trail and a residential neighborhood, their habitat value for birds is lower than other trees in the creek corridor due to the regular human activities immediately adjacent to them. The south side of Devereux Creek in the Project area is heavily vegetated and contains ample habitat for birds. Therefore, once construction was completed, bird watching would be able to continue as at present.

Nearby areas are also used for viewing monarch butterflies. As discussed under Impact BIO-1, monarch butterflies are not expected to be adversely affected by construction and operation of the emergency fire access road and water line because no aggregation habitat would be lost or disturbed. Thus, this activity would not be adversely affected.

AThus, any recreational impacts would be temporary and **less than significant (Class III)**.

5.9 TRANSPORTATION AND TRAFFIC

Traffic would be generated during the 6-week (21-working-day) construction period by the four to six construction workers; trucks needed to bring in supplies, such as gravel, pipe, and Allen block for the retaining wall; and trucks needed to dispose of the approximately 75 cubic yards of exported material and 80 cubic yards of vegetation and any removed trees, along with limited amounts of rubbish. As discussed in Chapter 2, approval would be obtained from the City of Goleta's Department of Public Works (Roads Division) for appropriate haul routes and times, and to the extent feasible, construction-related truck trips would be scheduled during non-peak hours to help reduce truck traffic and automobile congestion on roadways serving the Project site. Given these measures, traffic generated during construction would not adversely affect the local circulation system or increase hazards, nor would the limited amount of construction required adversely affect emergency access. Impacts would be **less than significant (Class III)**.

No long-term impacts would occur because creating an emergency access road closed to vehicular traffic along a short (approximately 500-foot) segment of an existing trail would not attract more visitors to this area.