4.0 ENVIRONMENTAL IMPACT EVALUATION

This section describes the environmental setting, evaluates the potential significant environmental impacts and, if necessary, identifies mitigation measures for each environmental issue area evaluated in this Supplemental Environmental Impact Report (SEIR). The scope of this SEIR is based on the project description provided in Section 2.0, as well as comments received during the scoping process, focusing on environmental issues that could result in potentially significant impacts. This section of the SEIR analyzes how impacts identified in the GP/CLUP Final EIR would change if the GPA were adopted. To determine this, the GPA was evaluated in terms of two questions:

1. Does the GPA result in any increases to the severity of impacts previously identified in the GP/CLUP Final EIR (e.g., from Class III to Class II or from Class II to Class I)?
2. Does the GPA have the potential to result in additional potentially significant impacts? If yes, is there feasible mitigation to reduce the potentially significant impact to a less than significant level?

Environmental Impact Classifications

To aid in the description of project-related environmental impacts, four types of impacts may be identified by the SEIR analysis:

Class I. Significant and Unavoidable. An impact whose effect cannot be avoided or reduced below a level of significance through the implementation of reasonably available and feasible mitigation measures. If a project with significant impacts is approved, CEQA requires that decision-makers adopt findings explaining project impacts and mitigation, and a statement of overriding considerations explaining why project benefits outweigh the environmental effects (CEQA Guidelines §15093).

Class II. Potentially Significant and Mitigable. An impact that can be reduced to below a level of significance by implementing reasonably available and feasible mitigation measures. If a project is approved, CEQA requires that decision-makers adopt findings explaining project impacts and mitigation.

Class III. **Less Than Significant.** A project may result in environmental impacts that are adverse, however, the effect of the impact does not exceed the applicable impact significance criteria. These impacts are considered to be "less than significant." Measures recommended to reduce less than significant impacts are not required under CEQA but may be implemented to minimize environmental effects to the extent possible and project-related contributions to cumulative impacts.

Class IV. Beneficial. An effect that would reduce resource degradation, hazards, or improve the environment may be referred to as a "beneficial" impact.

Applicable Policies

At the conclusion of each section, the applicable General Plan policies by resource area that are applicable to the Project are noted and that, when implemented, reduce impacts.

4.1 AESTHETICS AND VISUAL RESOURCES

Section 3.1 of the GP/CLUP Final EIR describes the following within the City's boundary and its immediate environs:

- Environmental setting (existing conditions and regulatory setting) for aesthetics and visual resources relating to the buildout of the GP/CLUP.
- The impacts associated with aesthetics and visual resources that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

4.1.1 Physical Setting

Regional Setting. The existing conditions description in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the descriptions of visual character, visual resources, and key public viewpoints.

Visual Characteristics of the Project Site. The visual character of the project site is primarily defined by views of sloping vacant land that is surrounded by residential development to the north, east and west. The elevation of the project site ranges from 55 feet above sea level near the southwestern corner to 94 feet at the top of a knoll in the northeastern portion of the site. Slopes on the project site vary, with two to five percent slopes in the southern and southwestern portions of the site, and five to ten percent slopes just below the knoll.

Vegetation on the project site consists mostly of non-native annual grassland that is periodically mowed for weed control purposes. Other vegetation includes several non-native trees including salt cedar, Canary Island date palms, and tara. The most visually prominent vegetation is located on and adjacent to the western edge of the site, where riparian vegetation associated with El Encanto Creek is located. This vegetation is dominated by coast live oak, arroyo willow, sycamore, Canary Island date palms, and other non-native trees. Other prominently visible vegetation is located south of and adjacent to the project site and is associated with a drainage ditch located between the site and Calle Real. Vegetation in the drainage ditch includes coyote brush, two small walnut trees, and three arroyo willows. The two narrow "arm" parcels that are part of the project site and would be used to provide pedestrian and bicycle trails are generally bordered by residences and landscape vegetation to the north and south.

The visual character of the project site is generally defined by views of disturbed vacant land that is predominately surrounded by urban development. There are no significant topographic features on the project site that substantially contribute to the visual quality of the site or the project area, and the most prominent natural feature associated with the site is the riparian vegetation along its western perimeter. Overall, the site is considered to have "moderate" visual quality.

Surrounding Uses. Land uses to the east, west, and north of the project site are dominated by single- and multi-family residences, and a small commercial development is also located to the west at Ellwood Station Road. South of the project site, land uses are dominated by Calle Real, U.S. Highway 101, and Union Pacific railroad tracks.

Scenic Corridor. The U.S. 101 and Calle Real transportation corridor is identified as a scenic corridor by Figure 6-1, Scenic and Visual Resources, of the GP/CLUP. In the vicinity of the project site, the northern side of the U.S. 101 and Calle Real scenic corridor is almost entirely bordered by residential development. Views of the foothills and Santa Ynez Mountains are occasionally available. Views of the mountains, however, are often obscured by intervening landscaping and structures. Generally, when the mountains are visible from the U.S. 101 and Calle Real corridor, only the upper portions of the mountains can be seen. GP/CLUP Figure 6-1 also indicates that "one-direction" views are provided from the U.S. 101 and Calle Real scenic corridor northward across the project site. The view corridor identified by GP/CLUP Figure 6-1 across the project site provides foreground views of the vacant project site and views of the Santa Ynez Mountains in the background.

Views of the Project Site. Views of the project site that are available to the general public are primarily from Calle Real, which is south of and adjacent to the site. The project site is visible from U.S. 101, however, due to the speed of passing motorists and the presence of landscaping adjacent to the highway, only limited views of the site are provided from the highway. Public views of the project site are also provided from the end of Puerto Drive, which is a short street segment between Tuolumne Drive and the northern project site property line.

Private views of the project site are available to residences adjacent to the project site to the north, east and west. Most of the residences to the north that are adjacent to the site are oriented towards Tuolumne Drive, but may have views of the site from backyards, although landscaping and fencing would generally limit those views.

4.1.2 Regulatory Setting

Section 6.0 of the City's GP/CLUP, the Visual and Historic Resources Element, provides policies that address the issues related to the identification and protection of scenic resources. The GP/CLUP policies address a variety of issues, including: scenic views (Policy VH 1), local scenic corridors (Policy VH 2), community character (Policy VH 3), and design review (Policy VH 4).

4.1.3 Thresholds of Significance

City of Goleta Environmental Thresholds and Guidelines Manual

The City's adopted Environmental Thresholds and Guidelines Manual (City of Goleta 2008) provides specific thresholds for conducting CEQA analysis. Section 19 of the Thresholds Manual, "Visual Aesthetics Impact Guidelines," provides guidance for assessing the significance of potential impacts on visual resources associated with a proposed project.

Based on the guidelines in the Thresholds Manual, a proposed project would result in a potentially significant visual impact if it would result in one or more of the following conditions:

1a. The project site has significant visual resources by virtue of surface waters, vegetation, elevation, slope, or other natural or man-made features which are publicly visible.

1b. The proposed project has the potential to degrade or significantly interfere with the public's enjoyment of the site's existing visual resources.

2a. The project has the potential to impact visual resources of the Coastal Zone or other visually important area (i.e., mountainous area, public park, urban fringe, or scenic travel corridor).

2b. The project has the potential to conflict with the policies set forth in the Local Coastal Plan, the General Plan or any applicable community plan to protect the identified views.

3. The project has the potential to create a significantly adverse aesthetic impact though obstruction of public views, incompatibility with surrounding uses, structures, or intensity of development, removal of significant amounts of vegetation, loss of important open space, substantial alteration of natural character, lack of adequate landscaping, or extensive grading visible from public areas.

CEQA Thresholds

Based on the City's Initial Study Checklist (CEQA Guidelines, Appendix G; Environmental Checklist Form) a project would result in a significant aesthetic impact if it would:

a. Have a substantial adverse effect on a scenic vista.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

c. Substantially degrade the existing visual character or quality of the site and its surroundings.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

4.1.4 Impact Evaluation

The GP/CLUP Final EIR identified the following Class I impacts (significant and unavoidable impacts) related to aesthetics and visual resources.

Class I Impacts Identified in the GP/CLUP Final EIR

Impact 3.1-1 Impacts of GP/CLUP on Visual Resources within the City, Including Views from Hollister Avenue and City Gateways.

The project site is not located along or near Hollister Avenue and is not located near a gateway area. Therefore, the GPA would not result in changes to Impact 3.1-1 as described in the GP/CLUP Final EIR.

Impact 3.1-2 Impacts of GP/CLUP on Citywide Visual Character.

The GP/CLUP Final EIR identified the four Class I impacts described below related to City-wide visual character. Policies VH 1 (Scenic Views), VH 3 (Community Character), and VH 4 (Design Review), were identified as methods to preserve overall community character in the City. The GP/CLUP Final EIR found that these policies would reduce impacts to the visual character of the City resulting from buildout of the GP/CLUP, but not to a less than significant level. As described below, the GPA would contribute to some of these Class I impacts.

Impact 3.1-2a Impacts to the Visual Character of City Subareas.

The project site is not located in a residential subarea identified in the GP/CLUP Final EIR (the Old Town and Northeast Community Center Subareas) as being subject to Class I impacts related to commercial development that would be incompatible with existing residential uses. Therefore, the GPA would not result in changes to Impact 3.1-2a as described in the GP/CLUP Final EIR.

Impact 3.1-2b Impacts to the Visual Character of Natural Open Space and Agricultural Areas.

The GP/CLUP Final EIR determined that implementation of the GP/CLUP would have the potential to convert 55.7 acres of agricultural lands to urban uses. The Final EIR identified Policy VH 1, "Scenic Views," as a measure to protect and preserve scenic resources, including agricultural areas, but ultimately concluded that a significant impact could still occur.

The proposed GPA would change the land use designations of project site from "Single Family Residential" and "Agriculture" to "Planned Residential-6.2 units per acre." The existing "Agriculture" land use designation encompasses the southern 3.8 acres of the project site. The proposed land use designation change from "Agriculture" to a residential designation would result in a small increase in the amount of agricultural land in the City that may be converted to urban uses. The increase would be from 55.7 to 59.3 acres or a six percent increase. As described above, however, the entire Project site has a vacant appearance rather than the appearance of active or fallow agricultural land, and Policy VH 1 would limit but not reduce the severity of this impact. Therefore, the GPA would contribute to visual character impacts resulting from the conversion of the agricultural land to urban uses, however it would not increase the severity of the significant and unavoidable impact described in the GP/CLUP Final EIR.

Impact 3.1-2c Impacts to the Visual Character of the Santa Ynez Mountains and Foothills.

The GP/CLUP Final EIR determined that there are very few vacant lands in the northern half of the City that, if developed, would impact views of the mountains. However, the Final EIR concluded that development on vacant land would have the potential to result in Class I impacts to views of the Santa Ynez Mountains and foothills.

The proposed GPA would facilitate residential development on the entire project site and that development would have the potential to block views of the Santa Ynez Mountains as seen from the Calle Real/U.S. 101 transportation corridor, a City designated scenic corridor. Therefore, the GPA could contribute to loss of mountain view impacts, however, it would not increase the severity of the significant and unavoidable impacts to mountain views described in the GP/CLUP Final EIR.

Impact 3.1-2d Impacts to Views from Cathedral Oaks Road, Glen Annie Road, Los Carneros Road North of U.S. 101, and Fairview Avenue.

The GP/CLUP Final EIR identified a Class I visual/aesthetics impact related to future development along the specified scenic corridors. The project site is not located adjacent to any of the identified scenic corridors. Therefore, the GPA would not increase the severity of Impact 3.1-2d as described in the GP/CLUP Final EIR.

Class II Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class II impacts (significant impacts reduced to less than significant with mitigation) related to aesthetics and visual resources.

Impact 3.1-3 Impacts of GP/CLUP on Visual Resources within the City Including Scenic Corridors and Public Viewpoints.

The GP/CLUP Final EIR identified five Class II impacts related to scenic corridors and public viewpoints. The GP/CLUP Final EIR identifies Policies VH 1 (Scenic Views), VH 2 (Local Scenic Corridors), and VH 4 (Design Review) as methods to preserve and enhance the visual character and public views within and from Goleta's scenic corridors. Scenic corridors within the City include U.S. 101, Hollister Avenue, SR-217, Cathedral Oaks Road, Glen Annie Road, Los Carneros Road north of U.S. 101, and Fairview Avenue. The GP/CLUP Final EIR found that the implementation of policies identified above would reduce impacts to visual character resulting from buildout of the GP/CLUP to a less than significant level (Class II). As discussed below, the GPA would incrementally add to the Class II impacts identified in the GP/CLUP Final EIR, but not enough to increase the severity of a Class II impact to a significant and unavoidable (Class I) impact.

Impact 3.1-3a Impacts to Views from U.S. 101.

The project site is located approximately 100 feet north of edge of the closest (westbound) lane of U.S. 101 and is visible from the freeway. The construction of residential uses on the project site would have the potential to result in significant impacts to views from the freeway, however, potential impacts would be minimized because new development would appear to be an extension of existing residential development adjacent to the east, west and north of the site. Future residential development on the site must be consistent with GP/CLUP Policy VH 4 (Design Review), which provides design guidelines for residential areas. Therefore, the GPA would result in additional impacts to views from U.S.101 due to development of the project site, however, the GPA would not increase the severity of impacts previously identified in the GP/CLUP Final EIR and would not have the potential to result in additional potentially significant impacts.

Impact 3.1-3b Impacts to Views from SR-217.

The project site is not located near SR-217 and is not visible from SR-217. Therefore, the GPA would not result in changes to Impact 3.1-3b.

Impact 3.1-3c Impacts to Views from Public Viewing Areas within the City.

The GP/CLUP identified numerous public viewing areas within the City, and the only identified viewing area that provides views of the project site is U.S. 101. As described by the analysis provided above for impact, 3.1-3a, the GPA would not increase the severity of impacts previously identified in the GP/CLUP related to views from the freeway. Therefore, the GPA would not increase the severity of impacts previously identified in the GP/CLUP Final EIR and would not have the potential to result in additional potentially significant changes to Impact 3.1-3c.

Impact 3.1-3d Impacts to Views from Areas within the Coastal Zone.

The project site is not within the Coastal Zone and is not visible from areas within the Coastal Zone. Therefore, the GPA would not result in changes to Impact 3.1-3d.

Impact 3.1-3e Light and Glare.

The GP/CLUP Final EIR identified significant impacts related to the increase of light and glare resulting from development of vacant land visible from U.S. 101 and other identified scenic corridors. The project site is located near the U.S. 101 corridor and the GPA would facilitate the construction of additional residences that would contribute to this impact. The GP/CLUP Final EIR concluded that the potential for lighting-related impacts to scenic corridors would be reduced to a less than significant level with the implementation of Policies VH-1 (Scenic Views) VH 2 (Local Scenic Corridors) and VH 4 (Design Review).

Future development on the project site would increase the amount of light visible from U.S. 101. Development on the project site, however, would also be required to be consistent with applicable design policies, which would reduce the potential for lighting-related impacts to the

U.S. 101 corridor. Therefore, the GPA would increase the severity of this but would not have the potential to result in additional potentially significant impacts.

Class III Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class III impacts (less than significant impacts) related to aesthetics and visual resources.

Impact 3.1-4 Impacts from Light and Glare.

The GP/CLUP Final EIR identified less than significant impacts related to the increase of light and glare visible from public view locations outside the City's boundaries because the most intense development would be adjacent to urbanized uses. The project site is not near the City's boundary. Further, there are no public view locations outside the City's boundaries in this area. Therefore, the GPA would not incrementally increase this impact and would not change the classification of this impact as Class III (less than significant).

Class IV Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified Class IV (beneficial) impacts related to improvements to the visual quality at City Gateways (i.e., roadways entering the city limits) and creation of well-defined public spaces. The GPA would not result in changes to the Class IV impacts.

4.1.5 Cumulative Impacts

The GP/CLUP Final EIR found that implementation of the GP/CLUP would result in a less than significant cumulative impact (Class III) to the visual character or quality of the City for the following reasons. First, future development would continue to be guided by local General Plan and local design review procedures, which would continue to protect the visual character of the area, visual compatibility, view corridors, and scenic resources and vistas. Second, most development would occur on vacant or underutilized lands, which comprise approximately six percent of the land within City boundaries. The GP/CLUP also found that implementation of the GP/CLUP would result in the development of a minimal amount of vacant land and such development would result in a visual extension of existing residential neighborhoods and commercial areas, which would not result in a significant change to the overall visual character of the City.

The proposed GPA would not result in a cumulatively considerable increase in impacts related to the visual character of the City because development on the project site would also be viewed as an extension of existing urban neighborhoods. Other cumulative development projects, such as the proposed Shelby GPA, would increase the amount of open space/agricultural land in the City that is converted to urban uses, however, that cumulative increase would not result in a significant visual character impact on a city-wide basis because the Shelby project site is also located adjacent to existing residential areas and development on that site would appear to be an extension of existing uses.

The GP/CLUP Final EIR found that the implementation of the GP/CLUP would result in less than significant cumulative impacts (Class III) related to increased light and glare associated with development of vacant and underutilized land because most of this development would occur in areas that already have development and nighttime lighting. Also, new development would be subject to design review processes that would control the effects of new lighting. Similarly, the GPA would not result in a cumulatively considerable contribution to cumulative impacts associated with light and glare because the changes would affect only properties already surrounded by urban uses and would be subject to similar design review processes.

4.1.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation is required.

Residual Impacts. Implementation of the GPA would increase significant visual character impacts over what was identified in the GP/CLUP Final EIR, including additional impacts related to the conversion of open space/agricultural land and impacts to views of the Santa Ynez Mountains and foothills. These impacts would remain significant and unavoidable (Class I). Impacts related to views from U.S. 101 and additional nighttime lighting would remain significant but would continue to be reduced to a less than significant level with the implementation of existing policies (Class II).

4.1.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its aesthetic and visual resource impacts are identified below.

Policy VH 1: Scenic Views [GP/CP]

VH 1.1 Scenic Resources. [GP/CP]

VH 1.2 Scenic Resources Map. [GP/CP]

VH 1.4 Protection of Mountain and Foothill Views. [GP/CP]

VH 1.5 Protection of Open Space Views. [GP/CP]

VH 1.6 Preservation of Natural Landforms. [GP/CP]

VH 1.8 Private Views. [GP]

Policy VH 2: Local Scenic Corridors [GP]

VH 2.1 Designated Scenic Corridors. [GP]

VH 2.2 Preservation of Scenic Corridors. [GP]

VH 2.3 Development Projects Along Scenic Corridors. [GP]

VH 2.4 Public Improvements. [GP]

Policy VH 3: Community Character [GP]

VH 3.1 Community Design Character. [GP]

VH 3.2 Neighborhood Identity. [GP]

VH 3.3 Site Design. [GP]

VH 3.4 Building Design. [GP]

VH 3.5 Pedestrian-Oriented Design. [GP]

VH 3.6 Public Spaces. [GP]

Policy VH 4: Design Review [GP]

VH 4.1 Design Review Board. [GP]

VH 4.3 Single-Family Residential Areas. [GP]

VH 4.4 Multifamily Residential Areas [GP]

VH 4.9 Landscape Design. [GP]

VH 4.10 Streetscape and Frontage Design. [GP]

VH 4.12 Lighting. [GP]

VH 4.14 Utilities. [GP]

VH 4.15 Site-Specific Visual Assessments. [GP]

VH 4.16 Green Building. [GP]

4.2 AGRICULTURE AND FARMLAND

Section 3.2 of the GP/CLUP Final EIR (City of Goleta, 2006) describes the following within the City's boundary:

- Environmental setting (existing conditions and regulatory setting) for agriculture and farmland relating to buildout of the GP/CLUP.
- The impacts associated with agriculture and farmland that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

4.2.1 Existing Conditions

The existing conditions description in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the descriptions of farmland in California, Santa Barbara County, and Goleta.

The farmland on the Kenwood Village project site is identified as "Site 3 (Roman Catholic Archbishops)" by the GP/CLUP Final EIR. At the time the General Plan EIR was prepared (2006), the entire project site was leased to Goleta farmer John Lane, who grew various row crops for the local Lane Farms business. However, Mr. Lane vacated the property in the summer of 2007, and the land has not been farmed since. The property transferred ownership to the project applicant in January 2008.

Around 2006 when the GP/CLUP Final EIR was completed, the California Department of Conservation described the project site as 3.1 acres of Prime Farmland and 5.3 acres of Unique Farmland. Soils on the site include: 3.9 acres of Agueda Silty Clay Loam (0-2% slopes) – Class I (AaA); 0.1 acre of Milpitis-Positas Fine Sandy Loam (2-9% slopes, eroded) – Class III (MeC); 4.1 acres of Milpitis-Positas Fine Sandy Loam – Class IV (MeD2); and 1.3 acres of Diablo Clay (2-9% slopes) – Class II (DaC).

Since the GP/CLUP Final EIR was prepared, the Department of Conservation's 2010 Important Farmland Map (California Department of Conservation, Important Farmland Finder, http://maps.conservation.ca.gov/ciff/ciff.html, accessed December 11, 2015) revised the farmland designation of the project site to "Grazing Land." The designation was changed based on observations made by the Department of Conservation (Hennessy, 2014). The Department identified the project site as "fallow/non-irrigated" during the compilation of the 2006 Important Farmlands Map and the site tracked as fallow for four years. As a result, the farmland designation was changed to "grazing" on the 2010 map. As a result of the property's limited acreage and lack of adjacent agricultural land, it is not eligible for a Williamson Act Agricultural Preserve contract.

4.2.2 Regulatory Framework

The description of the regulatory framework in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the discussions of federal, state, and local regulations, except as supplemented below.

The conversion of any lands in the City that are designated as Agriculture and are 10 acres or more are required to comply with the provisions of Measure G. However, as described in Section 1.0, Summary, the project site is exempt from Measure G.

4.2.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta Environmental Thresholds and Guidelines Manual

The City's adopted Thresholds Manual (City of Goleta, 2008) incorporates the significance thresholds of CEQA Appendix G, as discussed below.

CEQA Thresholds

As suggested by Appendix G of the CEQA Guidelines, a project may have a significant impact related to agricultural resources if it would result in any of the following:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to nonagricultural use.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract.

c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.

4.2.4 Impact Evaluation

Class I Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class I impacts (significant and unavoidable impacts) related to agriculture and farmland.

Impact 3.2-1 Conversion of Agricultural Land and Loss or Impairment of Agricultural Productivity.

The GP/CLUP Final EIR identified that buildout of the GP/CLUP would convert 55.7 acres of agricultural land to non-agricultural uses. It also identified the conversion of approximately 6.5 acres of Prime Farmland and 22 acres of Unique Farmland. The conversion of this agricultural land to nonagricultural uses was found to be a significant impact in the GP/CLUP Final EIR.

The project site was classified as Farmland of Local Importance (Site 3, Roman Catholic Archbishops/Kenwood) when the GP/CLUP Final EIR was prepared. However, due to the Department of Conservation's subsequent reclassification of the project site to Grazing Land, no additional Prime Farmland, Farmland of Statewide Importance, or Unique Farmland would be converted as a result of the GPA. Therefore, the GPA would not result in an increase in Impact 3.2-1.

Class II Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class II impacts (significant impacts reduced to less than significant with mitigation) related to agriculture and farmland.

Impact 3.2-2 Incompatible Land Uses and Structures.

The project site is not adjacent to agricultural land uses or agricultural operations. Therefore, the GPA would not result in changes to Impact 3.2-2 as described in the GP/CLUP Final EIR.

Class IV Impacts Identified in the GP/CLUP Final EIR

Impact 3.2-3 Preservation of Agricultural Land.

The GP/CLUP Final EIR found that a Class IV (beneficial) impact would result from implementation of the GP/CLUP because the remaining existing agricultural lands within the City would be preserved as agricultural uses (approximately 353.1 acres). The GPA would allow 3.8 acres of land currently designated as agriculture to be converted to nonagricultural uses, thereby reducing this beneficial impact by approximately 1.1%.

4.2.5 Cumulative Impacts

Impact 3.2-4 Cumulative Loss of Agricultural Land.

The GP/CLUP Final EIR identified significant and unavoidable (Class I) cumulative impacts on agricultural resources because implementation would convert important farmland (defined as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as designated by the Department of Conservation). When combined with other development that is converting agricultural lands, the cumulative impact on agricultural land is significant. The conversion of the project site as a result of the GPA would not increase or contribute to the severity of Impact 3.2-4 because the project site is no longer considered important farmland by the Department of Conservation.

4.2.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation is required.

Residual Impacts. Implementation of the GPA would not increase significant impacts to agriculture and farmlands identified in the GP/CLUP Final EIR because the GPA would not result in the conversion of any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agriculture use. Impacts related to agricultural land conversion in the City would remain significant and unavoidable.

4.2.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its agriculture and farmland impacts are identified below.

Policy LU 7: Agriculture [GP]

LU 7.1 General. [GP]

LU 7.2 Purpose. [GP]

LU 7.3 Designation Criteria. [GP]

LU 7. 4 Permitted Uses. [GP]

LU 7.5 City of Goleta Heritage Farmlands.

Policy CE 11: Preservation of Agricultural Lands [GP/CP]

CE 11.1 Agricultural Uses. [GP/CP]

CE 11.2 Conversion of Agricultural Lands. [GP/CP]

CE 11.10 Permanent Protection of Agricultural Lands. [GP/CP]

4.3 AIR QUALITY AND GREENHOUS GAS EMISSIONS

Section 3.3 of the GP/CLUP Final EIR (City of Goleta 2006) describes the following within the City boundary:

- Environmental setting (existing conditions and regulatory setting) for air quality relating to buildout of the GP/CLUP.
- The impacts associated with air quality that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

Since the preparation of the GP/CLUP Final EIR, CEQA now requires an evaluation of a project's greenhouse gas (GHG) emission. This section also describes project-related effects associated with GHG emissions.

4.3.1 Physical Setting

Air Quality

Regional Climate and Meteorology. The climate in and around Goleta, as in most of Southern California, is dominated by the strength and position of the semi-permanent high-pressure center that results in cool summers, mild winters, and infrequent rainfall.

Temperatures in the Goleta area average 59°F annually. In contrast to the steady temperature regime, rainfall is highly variable. Measurable precipitation occurs mainly from early November to mid-April and normally averages 18 inches of rain annually. Winds in the region display several characteristic regimes. During the day, especially in summer, winds are from the south in the morning and from the west in the afternoon. Daytime wind speeds are five to 10 miles per hour (mph) on average. At night, especially in winter, the land becomes cooler than the ocean and an offshore wind of three to five mph develops. Early morning winds are briefly from the southeast parallel to the coastline before the daytime onshore flow becomes well established again. The effect of the wind pattern on air pollution is that locally-generated emissions are carried offshore at night and toward inland Santa Barbara County during the day. One other important wind regime occurs when high pressure builds over the western United States and creates hot, dry and gusty Santa Ana winds from the north and northeast across Santa Barbara County.

In addition to winds that control the rate and direction of pollution dispersal, Southern California experiences strong temperature inversions that limit the vertical depth through which pollution can be mixed. In summer, coastal areas are characterized by a sharp discontinuity between the cool marine air at the surface and the warm, sinking air aloft within the high pressure cell over the ocean to the west. This marine/subsidence inversion allows for good local mixing, but acts like a lid over the basin. A second inversion type forms on clear winter nights

when cold air off the mountains sinks to the surface while the air aloft remains warm. This process forms radiation inversions. These inversions, in conjunction with calm winds, trap pollutants near their sources.

Table 4.3-1
Summary of Air Quality Data at Goleta Monitoring Station

Pollutant	2009	2010	2011	2012	2013
Ozone (O_3)					
State maximum 1-hr concentration (ppm)	0.090	0.072	0.091	0.065	0.075
State maximum 8-hr concentration (ppm)	0.077	0.065	0.075	0.056	0.064
Days State 1-hour Standard Exceeded (>0.09 ppm)	0	0	0	0	0
Days Federal 8-hour Standard Exceeded (>0.075 ppm)	1	0	0	0	0
Days State 8-hour Standard Exceeded (>0.070 ppm)	1	0	1	0	0
Carbon Monoxide (CO)					
Maximum 8-hr concentration (ppm)	0.60	0.56	0.56	0.65	-
Maximum 1-hr concentration (ppm)	1.6	2.0	2.0	1.6	-
Days Federal 8-hour Standard Exceeded (>9 ppm)	0	0	0	0	-
Days State 8-hour Standard Exceeded (>9.0 ppm)	0	0	0	0	-
Days Federal 1-hour Standard Exceeded (>35 ppm)	0	0	0	0	-
Days State 1-hour Standard Exceeded (>20 ppm)	0	0	0	0	-
Nitrogen Dioxide (NO_2)					
Maximum 1-hr concentration (ppm)	0.046	0.044	0.052	0.041	0.132
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	0
Suspended Particulates (PM_{10})					
State maximum 24-hr concentration ($\mu g/m^3$)	-	45.2	70.0	48.0	44.0
National maximum 24-hr concentration ($\mu g/m^3$)	-	44.0	67.9	46.5	43.0
Days State 24-hour Standard Exceeded (>50 $\mu g/m^3$)	-	-	-	0	-
Days Federal 24-hour Standard Exceeded (>150 $\mu g/m^3$)	-	-	0	0	0
Suspended Particulates ($PM_{2.5}$)					
State maximum 24-hr. concentration ($\mu g/m^3$)	-	23.6	18.4	29.0	20.5
National maximum 24-hr concentration ($\mu g/m^3$)	-	-	-	-	-
Days Federal 24-hour Standard Exceeded (>35 $\mu g/m^3$)	-	-	-	-	-

Notes:
ppm = parts per million
$\mu g/m^3$ = micrograms per cubic meter
Source: California Air Resources Board, 2014

Existing Air Quality. The Project is located in the South Central Coast Air Basin, which encompasses San Luis Obispo, Santa Barbara, and Ventura Counties. The California Air Resources Board (ARB) and the Santa Barbara County Air Pollution Control District (SBCAPCD) operate ambient air monitoring stations that measure pollutant concentrations throughout Santa Barbara County. The nearest monitoring station to the project site is the Goleta monitoring station, at 380 North Fairview Avenue, which monitors ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), inhalable particulate matter (PM_{10}), and fine particulate matter

($PM_{2.5}$). Table 4.3-1 summarizes the last five years of published data from the monitoring station.

Sensitive Receptors. Sensitive receptors are generally defined as pollutant-sensitive members of the population or where air pollutant emissions could adversely affect use of the land. Sensitive members of the population include those who may be more negatively affected by poor air quality than other members of the population, such as children, the elderly, or persons with respiratory conditions. In general, residential areas, hospitals, daycare facilities, elder-care facilities, elementary schools, and parks typically contain a high concentration of these sensitive population groups. Sensitive receptors in the vicinity of the project site include adjacent residential areas to the west, north and east.

Greenhouse Gas Emissions

Background Information. Greenhouse gases are referred to as such because they contribute to the "greenhouse effect," which traps heat radiated from the Earth's surface in the atmosphere. "Global climate change" describes changes in the earth's climate, such as an increase or decrease in temperatures, or a shift in precipitation patterns.

There is a substantial body of scientific evidence demonstrating that climate change is occurring due to an increase in the concentration of greenhouse gases in the Earth's atmosphere. The United Nations Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report considers new evidence of climate change based on many independent scientific analyses, from observations of the climate system, paleoclimate archives, theoretical studies of climate processes, and simulations using climate models. The IPCC Fifth Assessment Report summarizes observed changes in the Earth's climate system, including:

- The atmospheric concentrations of carbon dioxide, methane, and nitrous oxide have increased to levels unprecedented in at least the last 800,000 years. Carbon dioxide concentrations have increased by 40% since pre-industrial times, primarily from fossil fuel emissions and secondarily from net land use change emissions. The ocean has absorbed about 30% of the emitted anthropogenic carbon dioxide, causing ocean acidification.

- Warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. The atmosphere and ocean have warmed, the amounts of snow and ice have diminished, sea level has risen, and the concentrations of greenhouse gases have increased.

- Each of the last three decades has been successively warmer at the Earth's surface than any preceding decade since 1850. In the Northern Hemisphere, 1983–2012 was likely the warmest 30-year period of the last 1400 years.

- Ocean warming dominates the increase in energy stored in the climate system, accounting for more than 90% of the energy accumulated between 1971 and 2010. It is virtually certain that the upper ocean (0−700 m) warmed from 1971 to 2010.

- There is high confidence that the rate of sea level rise since the mid-19th century has been larger than the mean rate during the previous two millennia. Over the period 1901 to 2010, global mean sea level rose by 0.19 meters.

According to the IPCC, global warming may cause a variety of environmental changes, such as:

- It is virtually certain that over most land areas, warmer and fewer cold days and nights would occur, and warmer and more frequent hot days and nights would occur.

- It is very likely that the frequency of warm spells/heat waves would be increased over most land areas.

- It is very likely that the frequency of heavy precipitation events would be increased over most areas.

- It is likely that areas affected by drought would be increased.

- It is likely that intense tropical cyclone activity would be increased.

- It is likely that there would be increased incidence of extreme high sea levels.

The effects of climate change may also include a rise in sea level caused by an expansion of the ocean water volume due to an increase in water temperature, melting glaciers and melting polar ice caps. Estimates of future sea level elevations vary considerably based on assumptions regarding greenhouse gas emission control effectiveness and other factors. Sea level rise predictions recommended for use by the California Coastal Commission (2015) indicate that compared to 2000 conditions, sea level could rise two to 12 inches by 2030; five to 24 inches by 2050; and 17-66 inches by 2100.

State law defines greenhouse gases to include the following: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. Another greenhouse gas is water vapor. Water vapor is not recognized in state law and climate change programs such as the Kyoto Protocol because there is no obvious correlation between water vapor concentration and specific human activities.

Greenhouse gases have varying global warming potential. The reference gas for global warming potential is carbon dioxide, which has been assigned a global warming potential of "1." Methane gas is another gas that contributes to global warming and has been assigned a global warming potential of 21, which means that is has a greater global warming effect than carbon dioxide on a molecule per molecule basis. Sulfur hexafluoride has a global warming potential of 23,900. The most important greenhouse gas in human-induced global warming is carbon dioxide.

While other greenhouse gases have higher global warming potential, carbon dioxide is emitted in such vastly higher quantities that it accounts for 85 percent of the global warming potential of all greenhouse gases emitted by the United States. Greenhouse gas emissions are typically measured in terms of carbon dioxide equivalents, which is the product of the mass of a particular greenhouse gas and its specific global warming potential.

4.3.2 Regulatory Setting

Air Quality

Air quality is regulated by the Federal Clean Air Act (CAA) and California Clean Air Act (CCAA), and by local air district planning that is conducted pursuant to the Acts. At the Federal level, the U.S. Environmental Protection Agency (EPA) administers the CAA. The CCAA is administered by the ARB and by the air quality management districts at the regional and local levels. The Santa Barbara County Air Pollution Control District (SBCAPCD) has local jurisdiction over the project region.

Ambient Air Quality Standards and Area Attainment Designations. EPA and ARB have established national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS), respectively, for the following six criteria air pollutants: ozone (O_3), particulate matter (PM_{10} and $PM_{2.5}$), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These standards currently in effect in California are shown in Table 4.3-2. Sources and health effects of criteria air pollutants are summarized in Table 4.3-3.

Other pollutants of concern in the project area are toxic air contaminants (TACs). Although no air quality standards exist for TACs, they may result in an increase in mortality or serious illness, or pose a present or potential hazard to human health. Health effects of TACs include cancer, birth defects, neurological damage, damage to the body's natural defense system, and various diseases. In 1998, following a 10-year scientific assessment process, ARB identified particulate matter from diesel-fueled engines, commonly called diesel particulate matter (DPM), as a TAC. Compared with other air toxics ARB has identified, DPM emissions are estimated to be responsible for about 70 percent of the total ambient air toxics risk (California Air Resources Board 2000).

Based on local monitoring data areas are classified as either in attainment or in nonattainment with respect to NAAQS and CAAQS. If a pollutant concentration is lower than the State or Federal standard, the area is considered to be in attainment of the standard for that pollutant. If pollutant levels exceed a standard, the area is considered a nonattainment area. If data are insufficient to determine whether a pollutant is violating the standard, the area is designated unclassified. Table 4.3-2 summarizes the attainment status of Santa Barbara County with regard to the NAAQS and CAAQS.

Table 4.3-2
Ambient Air Quality Standards

Criteria Pollutant	Averaging Time	California Standards	National Standards [a]		Attainment Status of Santa Barbara County [b]	
			Primary	Secondary	State	National
Ozone	1-hour	0.09 ppm	None	None	Nonattainment	-- [c]
	8–hour	0.070 ppm	0.075 ppm	0.075 ppm	Nonattainment	Unclassified/ Attainment
Particulate Matter (PM_{10})	24-hour	50 µg/m^3	150 µg/m^3	150 µg/m^3	Nonattainment	Attainment
	Annual mean	20 µg/m^3	None	None	Nonattainment	Attainment
Fine Particulate Matter ($PM_{2.5}$)	24-hour	None	35 µg/m^3	35 µg/m^3	--	Unclassified/ Attainment
	Annual mean	12 µg/m^3	12.0 µg/m^3	15.0 µg/m^3	Unclassified	Unclassified
Carbon Monoxide	8-hour	9.0 ppm	9 ppm	None	Attainment	Attainment
	1-hour	20 ppm	35 ppm	None	Attainment	Attainment
Nitrogen Dioxide	Annual mean	0.030 ppm	0.053 ppm	0.053 ppm	Attainment	Unclassified/ Attainment
	1-hour	0.18 ppm	0.100 ppm	None	Attainment	Unclassified/ Attainment
Sulfur Dioxide	Annual mean	None	0.030 ppm	None	--	--
	24-hour	0.04 ppm	0.014 ppm	None	Attainment	--
	3-hour	None	None	0.5 ppm	--	--
	1-hour	0.25 ppm	0.075 ppm	None	Attainment	--
Lead	30-day Average	1.5 µg/m^3	None	None	Attainment	--
	Calendar quarter	None	1.5 µg/m^3	1.5 µg/m^3	--	Attainment
	3-month average	None	0.15 µg/m^3	0.15 µg/m^3	--	Unclassified
Sulfates	24-hour	25 µg/m^3	None	None	Attainment	--
Hydrogen Sulfide	1-hour	0.03 ppm	None	None	Attainment	--
Vinyl Chloride	24-hour	0.01 ppm	None	None	--	--

µg/m^3 = micrograms per cubic meter

[a] National standards are divided into primary and secondary standards. Primary standards are intended to protect public health, whereas secondary standards are intended to protect public welfare and the environment.

[b] Local monitoring data are used to designate areas as nonattainment, maintenance, attainment, or unclassified for the NAAQS and CAAQS. The four designations are further defined as:

Nonattainment:—assigned to areas where monitored pollutant concentrations consistently violate the standard in question.

Maintenance—assigned to areas where monitored pollutant concentrations exceeded the standard in question in the past but are no longer in violation of that standard.

Attainment—assigned to areas where pollutant concentrations meet the standard in question over a designated period of time.

Unclassified—assigned to areas were data are insufficient to determine whether a pollutant is violating the standard in question.

[c] The Federal 1-hour standard of 12 parts per hundred million was in effect from 1979 through June 15, 2005. The revoked standard is referenced because it was employed for such a long period and is a benchmark for State Implementation Plans.

Source: California Air Resources Board 2013a, 2013b.

Table 4.3-3
Source and Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O_3)	Formed when reactive organic gases (ROG) and nitrogen oxides (NO_X) react in the presence of sunlight. ROG sources include any source that burns fuels, (e.g., gasoline, natural gas, wood, oil) solvents, petroleum processing and storage and pesticides.	Breathing difficulties, lung tissue damage, damage to rubber and some plastics
Respirable Particulate Matter (PM_{10})	Road dust, windblown dust (agriculture) and construction (fireplaces). Also formed from other pollutants (acid rain, NO_X, sulfur oxides [SO_X], organics). Incomplete combustion of any fuel.	Increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling
Fine Particulate Matter ($PM_{2.5}$)	Fuel combustion in motor vehicles, equipment and industrial sources, and residential and agricultural burning. Also formed from reaction of other pollutants (acid rain, NO_X, SO_X, organics).	Increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling
Carbon Monoxide (CO)	Any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment and residential heating.	Chest pain in heart patients, headaches, reduced mental alertness
Nitrogen Dioxide (NO_2)	See carbon monoxide	Lung irritation and damage. Reacts in the atmosphere to form ozone and acid rain
Lead (Pb)	Metal Smelters, Resource Recovery, Leaded Gasoline, Deterioration of Lead Paint	Learning disabilities, brain and kidney damage
Sulfur Dioxide (SO_2)	Coal or Oil Burning Power Plants and Industries, Refineries, Diesel Engines	Increases lung disease and breathing problems for asthmatics. Reacts in the atmosphere to form acid rain.
Visibility Reducing Particles	See $PM_{2.5}$	Reduces visibility (e.g., obscures mountains and other scenery), reduced airport safety, lower real estate value, discourages tourism.
Sulfates	Produced by the reaction in the air of SO_2 (see SO_2 sources), a component of acid rain.	Breathing difficulties, aggravates asthma, reduced visibility
Hydrogen Sulfide	Geothermal Power Plants, Petroleum Production and Refining, Sewer Gas	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations).

Source: California Air Resources Board, 2009

Santa Barbara County is designated as a Federal O_3 unclassifiable/attainment area for the 8-hour O_3 standard (the 1-hour Federal standard was revoked for Santa Barbara County). The State 8-hour O_3 standard has been exceeded and the State standard for PM_{10} continues to be exceeded. Santa Barbara County is, therefore, a nonattainment area for the State standards for O_3

and PM_{10}. The county is in attainment for the Federal $PM_{2.5}$ standard and unclassified for the State $PM_{2.5}$ standard, and is designated "attainment" or "unclassified" for other State standards and for all Federal clean air standards.

Air Quality Planning. State and Federal laws require local jurisdictions that do not meet clean air standards to develop plans and programs to bring those areas into compliance. These plans typically contain emission reduction measures and attainment schedules to meet specified deadlines. If and when attainment is reached, the attainment plan becomes a "maintenance plan."

In 2001, an attainment plan was developed by the SBCAPCD that was designed to meet both Federal and State planning requirements. The Federal attainment plan was combined with those from other statewide nonattainment areas to become the State Implementation Plan (SIP). The 2001 Clean Air Plan (CAP) was adopted as the Santa Barbara portion of the SIP, designed to meet and maintain Federal clean air standards.

The 2004 CAP demonstrates how the County will make progress towards meeting the State 1-hour ozone standard, while the 2007 CAP pertains to provisions of the Federal Clean Air Act that apply to the county's current designation as an attainment area for the Federal 8-hour O_3 standard. The 2010 CAP incorporated updated data and focused on the identification and implementation of measures related to achieving attainment with the State 8-hour O_3 standard. The 2013 CAP was adopted in March 2015 and is the sixth triennial update to the initial State Clean Air Plan adopted by the SBAPCD. Similar to other CAP updates, the 2013 CAP identifies and evaluates "an all feasible measures" strategy to ensure continued progress towards attainment of the State ozone standards.

Santa Barbara County Air Pollution Control District Rules and Regulations. SBCAPCD is responsible for establishing and enforcing local air quality rules and regulations that address the requirements of Federal and State air quality laws. The Project may be subject to the following SBCAPCD rules (as well as others):

- Rule 302—Visible Emissions
- Rule 303—Nuisance
- Rule 305—Particulate Matter
- Rule 323—Architectural Coatings
- Rule 329—Cutback and Emulsified Asphalt Paving Materials
- Rule 345—Control of Fugitive Dust from Construction and Demolition Activities
- Rule 352—Natural Gas-Fired Fan-Type Central Furnaces and Small Water Heaters
- Rule 360—Emissions of Oxides of Nitrogen From Large Water Heaters and Small Boilers

The SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (April 2015) provides various techniques to reduce emissions associated with construction-related fugitive dust to comply with Rules 302, 303, 305, and 345. The following SBCAPCD measures will be implemented:

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this must include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency must be required whenever the wind speed exceeds 15 mph. Reclaimed water must be used whenever possible.

- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.

- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days must be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site must be tarped from the point of origin.

- Gravel pads must be installed at all access points to prevent tracking of mud onto public roads.

- After clearing, grading, earth moving or excavation is completed, the disturbed area must be treated by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.

- The contractor or builder must designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties must include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons must be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

- Prior to land use clearance, the applicant must include, as a note on a separate informational sheet to be recorded with map, these dust control requirements. All requirements must be shown on grading and building plans.

- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines must be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.

- Diesel powered equipment should be replaced by electric equipment whenever feasible.

- If feasible, diesel construction equipment must be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.

- Catalytic converters must be installed on gasoline-powered equipment, if feasible.

- All construction equipment must be maintained in tune per the manufacturer's specifications.

- The engine size of construction equipment must be the minimum practical size.

- The number of construction equipment operating simultaneously must be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.

- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

The following is a list of regulatory requirements and control strategies that would be implemented to the maximum extent feasible. Measures will be shown on grading and building plans and adhered to throughout grading, hauling, and construction activities. The following measures are required by state law:

- All portable diesel-powered construction equipment must be registered with the state's portable equipment registration program OR shall obtain an APCD permit.

- Fleet owners of mobile construction equipment are subject to the CARB Regulation for In-use Off-road Diesel Vehicles (13 California Code of Regulations § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.

- All commercial diesel vehicles are subject to California Code of Regulations, Title 13, § 2485 which limits engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading is limited to five minutes; electric auxiliary power units should be used whenever possible.

To comply with SBAPCD Rules 323.1, 329, 352 and 360, the following measures will be implemented:

- Construction of new buildings and appurtenances could involve application of coatings that contain VOC. To minimize VOC emissions, Rule 323.1 requires that architectural coatings, as defined by the SBAPCD, must comply with VOC limits specified in SBAPCD Rule 323.1-1.

- Construction of new parking areas on site would require application of aggregate concrete (asphalt) that could create objectionable odors. Such odors would be temporary and localized and would be subject to SBCAPCD Rule 329. Rule 329 requires asphalting procedures that would minimize air quality impacts, including odor, associated with construction of new parking areas.

- Construction of the Project may involve the use of natural gas-fired fan-type central furnaces and water heaters. Rules 352 and 360 require that furnaces and water heaters meet specified limits to minimize NOX emissions and be certified by the APCD for use.

City of Goleta. All new residential buildings must comply with California Building Standards Code as adopted by the Goleta Municipal Code; the Green Building Code as adopted by the Goleta Municipal Code; and the Energy Efficiency Standards of the City to meet the objectives of greenhouse emissions reductions under the California Global Warming Solutions Act of 2006 (AB 32).

Greenhous Gas Emissions

Greenhouse gas emission reduction regulations applicable to the proposed Project are briefly described below.

California Executive Order S-3-05. Former Governor Schwarzenegger issued Executive Order (EO) S-3-05 in 2005 to establish statewide greenhouse gas emissions reduction targets. EO S-3-05 provides that by 2010, emissions be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions be reduced to 80 percent of 1990 levels. In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report. The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce greenhouse gas emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies.

California Global Warming Solutions Act (Health and Safety Code §§ 38500, *et seq*., aka "**AB 32").** AB 32 was signed into law in 2006 and established a statewide goal of reducing greenhouse emissions to 1990 levels by 2020 and requires the California Air Resources Board (CARB) to prepare a Scoping Plan that outlines strategies for reducing greenhouse gases to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide greenhouse gas emissions. The Scoping Plan was approved by CARB in 2008 and includes measures to address greenhouse gas emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. The Scoping Plan includes a range of greenhouse gas reduction actions that may include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms.

Senate Bill 97 (SB 97). SB 97 (adding Public Resources Code § 21083.05) was enacted in 2007 and acknowledges that climate change is an environmental issue that requires analysis in CEQA documents. The bill also required the Office of Planning and Research to develop, and the California Resources Agency to certify and adopt amendments to the CEQA Guidelines for the analysis of greenhouse gas emissions. Amendments to the CEQA Guidelines addressing greenhouse gas emissions became effective in 2010.

Senate Bill 375 (SB 375). SB 375 was enacted in 2008 and enhances the State's ability to reach AB 32 goals by directing CARB to develop regional greenhouse gas emission reduction targets primarily through a reduction in vehicle miles travelled. SB 375 directs each of the State's 18 major Metropolitan Planning Organizations to prepare a "sustainable communities strategy" that contains a growth strategy to meet specified emission targets for inclusion in the Regional Transportation Plan. In 2010, CARB adopted final regional targets for reducing greenhouse gas emissions from 2005 levels by 2020 and 2035. The Santa Barbara County Association of Governments was assigned targets of an eight percent reduction in greenhouse gases from transportation sources by 2020 and a 13 percent reduction in greenhouse gases from transportation sources by 2035.

City of Goleta Climate Action Plan. Consistent with California's objectives outlined in AB 32, the City added Conservation Element Implementation Action 5 (CE-IA-5) to its 2006 General Plan/Coastal Land Use Plan in 2009, which requires the City to develop a Greenhouse Gas Reduction Plan supporting the State's implementation of AB 32. The City's Climate Action Plan (2014) outlines a framework to reduce community greenhouse gas emissions in a manner that meets the intent of CE-IA-5 and is supportive of AB 32 and Executive Order S-3-05. The Plan identifies both quantified and non-quantified measures to meet greenhouse gas reduction targets; establishes a 2007 baseline inventory; a planning horizon of 2007 through 2030 and quantifies greenhouse gas greenhouse has emission from community-at-large and City operations; establishes reduction targets for 2020 and 2030; identifies measures to reduce greenhouse gas levels, focusing on those that the City has authority to implement; and provides guidance for monitoring progress on an annual basis. While CE-IA-5 does not specify a reduction target, the City has decided to use a target of reducing future emissions of greenhouse gases 11 percent below 2007 emissions by 2020 and 26 percent below 2020 levels by 2030.

The Climate Action Plan includes the following greenhouse gas emission reduction categories and general implementation actions:

- *Building Energy* measures are intended to reduce greenhouse gas emissions by improving the energy efficiency of both new and existing residential and commercial buildings, increasing the use of renewable energy, and improving community-wide understanding of energy management.

- *On-Road Transportation and Land Use* measures focus on reducing emissions by reducing vehicle miles traveled through multimodal transportation options, and reducing emissions by supporting design guidelines that will result in more compact, walkable, and transit-accessible neighborhoods.

- *Water Consumption* measure are intended to reduce water demand and conserve water, thereby reducing energy use for moving water and associated emission reductions.

- *Off-Road Transportation and Equipment* measures are intended to increase the use of alternative fuels in construction, landscaping, off-road equipment, and vehicles, and reduce the consumption of fossil fuels.

- *Solid Waste* measures reduce emissions by diverting waste from landfills, and supporting continual improvement in equipment and operations associated with solid waste management.

All new residential buildings must comply with applicable law including, without limitation, the Goleta Municipal Code, to meet the objectives of greenhouse gas emissions reductions under AB 32.

City of Goleta Energy Efficiency Standards. The Goleta City Council adopted the 2010 Edition of the California Green Building Standards Code (24 California Code of Regulations Part 11) as the Green Building Code of the City (as codified in Goleta Municipal Code Chapter 15.12). The Green Building Code mandates new requirements for planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, environmental quality, and installer and special inspector qualifications. In 2010, the City also adopted Goleta Municipal Code Chapter 15.13, entitled "Energy Efficiency Standards," establishing minimum energy efficiency standards for new building construction. The Municipal Code requires that new residential and nonresidential construction and additions greater than 500 square feet use a performance approach to demonstrate that they exceed the 2008 California Green Building Standards by 15 percent.

4.3.3 Thresholds of Significance

Air Quality

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

Thresholds of significance are provided by the SBCAPCD's adopted Environmental Thresholds and Guidelines Manual (Santa Barbara County Air Pollution Control District, 2015) and threshold standards from Appendix G of the CEQA Guidelines. Specific thresholds relating to air quality impacts are discussed below.

CEQA Thresholds

Per Appendix G of the CEQA Guidelines, a project would pose a significant air quality impact if any of the following were to occur as a result of the project:

- Conflict with or obstruct implementation of the applicable air quality plan.

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in a state of non-attainment under applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

- Expose sensitive receptors to substantial pollutant concentrations.

- Create objectionable odors affecting a substantial number of people.

SBCAPCD Thresholds

According to the CEQA Guidelines, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make significance determinations for items a through e above. The following criteria pollutant significance thresholds have been established by the SBCAPCD (Santa Barbara County Air Pollution Control District, 2015). The SBBAPCD thresholds have been used as they are more current than the City's air quality significance thresholds, which were initially approved by the Santa Barbara County Board of Supervisors in 1994. As indicated by the SBAPCD, a project will not have a significant impact on air quality, either individually or cumulatively, if operation of the project will:

1 Emit (from all project sources, both stationary and mobile) less than the daily trigger for offsets or Air Quality Impact Analysis set in the APCD New Source Review Rule, for any pollutant (i.e., 240 pounds per day for ROC or NO_x; and 80 pounds per day for PM_{10}. There is no daily operation threshold for CO; it is an attainment pollutant);

2. Emit less than 25 pounds per day of NO_x or ROC from motor vehicle trips only;

3. Not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone);

4. Not exceed the APCD health risk public notification thresholds adopted by the APCD Board (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than one for non-cancer risk); and

5. Be consistent with the latest adopted Federal and State air quality plans for Santa Barbara County.

The cumulative contribution of project emissions to regional levels should be compared with existing progress and plans, including the most recent CAP. Due to Santa Barbara County's nonattainment status for ozone and the regional nature of ozone as a pollutant, if a project's air pollutant emissions of either of the ozone precursors (NO_x or ROC) exceed the long-term thresholds, then the project's cumulative impacts will be considered significant. For projects that

do not have significant ozone precursor emissions or localized pollutant impacts, if emissions have been taken into account in the most recent CAP growth projections, regional cumulative impacts may be considered to be insignificant. When a project's emissions exceed the thresholds and are clearly not accounted for in the most recent CAP growth projections, then the project is considered to have significant cumulative impacts that must be mitigated to a level of insignificance.

The District does not currently have quantitative thresholds of significance for short-term or construction emissions. However, the APCD uses 25 tons per year for ROC or NO_x as a guideline for evaluating the significance of construction impacts.

Since Santa Barbara County does not comply with the state standard for PM_{10}, policies of the 1979 Air Quality Attainment Plan require that all discretionary construction activities implement dust control measures, regardless of the significance of fugitive dust impacts. Dust control measures are also required to minimize the potential for dust-related nuisance impacts.

Greenhouse Gas Emissions

According to the CEQA Guidelines, impacts related to greenhouse gas emissions would be significant if a project would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Neither the State of California, Santa Barbara Air Pollution Control District, nor the City of Goleta has established CEQA significance thresholds for greenhouse gas emissions. On June 2, 2010, the Bay Area Air Quality Management District's (BAAQMD) Board of Directors unanimously adopted thresholds of significance to assist in the CEQA review of projects. The thresholds establish the level at which the District determined air pollution emissions would cause significant environmental impacts. The BAAQMD's guidance on determining the significance of greenhouse gas emissions are summarized in Table 4.3-4.

Table 4.3-4
Bay Area Air Quality Management District
Greenhouse Gas Significance Determination Guidelines

Greenhouse Gas Emission Source	Operational Emissions
Non-Stationary Sources	1,100 MT of CO_2E/year OR 4.6 MT CO_2E/SP/year
Stationary Sources	10,000 MT CO_2E/year

SP = service population
MT = metric tons

According to the methodology used to establish the BAAQMD greenhouse gas threshold, the threshold of 1,100 MT CO2E/year is the emissions level below which a project's contribution to global climate change would be less than "cumulatively considerable." For projects that are not stationary sources, the BAAQMD established an "efficiency" threshold that is intended to avoid penalizing large projects that incorporate emissions-reducing features and/or that are located in a manner that results in relatively low vehicle miles traveled. This threshold establishes a maximum allowable quantity of emissions per capita or "service population," which is defined as project residents and employees. As defined by the BAAQMD thresholds, a project's contribution to greenhouse gas emissions would not be cumulatively considerable if the project would result in less than 4.6 metric tons of CO_2E/service population/year.

On March 5, 2012 the Alameda County Superior Court issued a judgment finding that the BAAQMD failed to comply with CEQA when it adopted its greenhouse gas emissions thresholds. The court did not determine whether the thresholds were valid on the merits, but found that the adoption of the thresholds was a project under CEQA. The court ordered the District to set aside the thresholds until it complied with CEQA. The District appealed the Alameda County Superior Court's decision. The Court of Appeal of the State of California, First Appellate District, reversed the trial court's decision. The Court of Appeal's decision was appealed to the California Supreme Court, which granted limited review.[1] On December 17, 2015, the California Supreme Court reversed the Court of Appeal's decision and remanded the matter back to the Court of Appeal for further consideration.

The BAAQMD greenhouse gas emissions thresholds included substantial evidence that compliance with the thresholds would demonstrate that a project would be consistent with the statewide emissions reduction goal established in AB 32, and therefore, would result in a less than significant impact under CEQA. For purposes of the proposed GPA, the City has determined that BAAQMD's greenhouse gas emissions significance thresholds have a strong regulatory and technical underpinning. In June 2010, the Santa Barbara County Planning and Development Department produced a memorandum, "Support for Use of Bay Area Air Quality Management District Greenhouse Gas Emissions Standards," providing evidentiary support for reliance on the BAAQMD standards as interim thresholds of significance in Santa Barbara County (SBCPD 2010). The memorandum notes that certain counties in the Bay Area are similar to Santa Barbara County in terms of population growth, land use patterns, general plan policies, and average commute patterns and times.

[1] In March 2012, an Alameda County Superior Court (*California Building Industry Assoc. v. Bay Area Air Quality Management District* (March 5, 2012) Alameda Super. Ct. Case No. RG10-548693) ruled that BAAQMD needed to comply with CEQA before adopting its 2010 Air Quality CEQA Guidelines, which included significance thresholds for criteria air pollutants and GHGs. On August 13, 2013, the Court of Appeal (*California Building Industry Assoc. v. Bay Area Air Quality Management District* (2013) 218 Cal.App.4th 1171, *rev. granted*) reversed the lower court's decision and upheld the BAAQMD Guidelines. That decision was appealed to the California Supreme Court, which granted review on November 26, 2013. On December 17, 2015, the California Supreme Court made a partial ruling, but remanded the substantive question, i.e., whether the 2010 Air Quality CEQA Guidelines were valid, back to the Court of Appeal for a decision (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369).

Given that the City of Goleta does not have established thresholds of significance for greenhouse gas emissions, and as the City is located in Santa Barbara County, the rationale for applicability of the BAAQMD thresholds should generally apply. Therefore, for this Project, the City has applied the following two thresholds of significance.[2] A significant impact related to greenhouse gas emissions would occur if the Project would:

1. Exceed the daily long-term greenhouse gas significance thresholds adopted by the BAAQMD of 1,100 metric tons of CO_2E/year, or 4.6 metric tons of CO_2E/service population/year.

2. Fail to implement reasonable and feasible means to minimize greenhouse gas emissions from a qualitative standpoint in a manner that is consistent with the goals and objectives of AB 32 as implemented through the City's 2014 Climate Action Plan.

4.3.4 Impact Evaluation

Class I Impacts

Short-Term Impacts

The GP/CLUP Final EIR found that no short-term Class I air quality impacts (significant and unavoidable impacts) would result from GP/CLUP implementation.

Any short-term air quality or GHG impacts that would result from buildout of the GP/CLUP would be caused by construction emissions, which can be reduced to a less than significant level. Similarly, any short-term impacts resulting from construction activities on the project site and allowed by the proposed GPA would be less than significant with the implementation of standard construction-site dust control and emission reduction standards. The GPA would not result in any new or additional short-term Class I air quality or GHG impacts. Additional analysis of potential short-term air quality impacts is evaluated under Impact 3.3-1 below.

Long-Term Impacts

The GP/CLUP Final EIR found that no long-term Class I air quality impacts would result from GP/CLUP implementation.

Any long-term air quality impacts that would result from buildout of the GP/CLUP would be less than significant and are classified as Class III, as described below. Similarly, any incremental increase in long-term air quality impacts resulting from the GPA would also be less

[2] 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 greenhouse gas significance threshold for all present or future project analyses.

than significant. The GPA would not result in any new or additional long-term Class I air quality or GHG impacts. Additional analyses of potential long-term air quality impacts are evaluated under Impacts 3.3-2, 3.3-3, and 3.3-4, below.

Short-Term Class II Impacts

Impact 3.3-1 Construction Emissions.

The GP/CLUP Final EIR found that significant short-term, construction-related impacts would occur due to the disturbance of friable asbestos during demolition of older structures during the buildout of the Plan. However, demolition activity involving asbestos is required to be conducted in accordance with SBCAPCD Rule 1001, which requires SBCAPCD notification and use of licensed asbestos contractors to remove all asbestos prior to demolition. Compliance with Rule 1001 on all future demolition and construction activity with asbestos-containing materials would reduce impacts to less than significant level. SBCAPCD Rule 1001 implements the EPA's National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the reporting and removal of asbestos associated with demolition and renovation. The GPA project site does not contain any structures and implementation of future development on the project site would not have the potential to result in the release of asbestos fibers.

The GP/CLUP also found that significant short-term impacts could occur if construction activities occurred near sensitive receptors such as residences, schools, and hospitals. The GP/CLUP Final EIR identified Conservation, Land Use, Public Facilities, Safety, and Transportation policies that would protect air quality and minimize the risk to sensitive receptors and the environmental from toxic air contaminants.

In addition to the GP/CLUP policies, the SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (updated April, 2015) states that the following dust control measures are required for all projects involving earthmoving activities regardless of the project size or duration:

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.

- Minimize amount of disturbed area and reduce onsite vehicle speeds to 15 miles per hour or less.

- If importation, exportation, and stockpiling of fill material are involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.

- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.

- After clearing, grading, earthmoving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.

- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SBCAPCD prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

- Prior to land use clearance, the applicant shall include, as a note on a separate informational sheet to be recorded with a map, these dust control requirements. All requirements shall be shown on grading and building plans.

In addition to implementing the dust control measures required by the SBCAPCD, the following measures are recommended by the APCD to reduce construction equipment emissions:

- Diesel construction equipment meeting the CARB Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.

- Diesel-powered equipment should be replaced by electric equipment whenever feasible.

- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts, and diesel particulate filters as certified and/or verified by the EPA or California.

- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.

- All construction equipment shall be maintained in tune per the manufacturer's specifications.

- The engine size of construction equipment shall be the minimum practical size.

- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.

- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

Particulate emissions from diesel exhaust are classified as carcinogenic by the State of California. The following is a list of regulatory requirements and control strategies that would be implemented to the maximum extent feasible. Measures will be shown on grading and building plans, and adhered to throughout grading, hauling, and construction activities. The following measures are required by California law:

- All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR obtain an APCD permit.

- Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title13 California Code of Regulations § 2449), the purpose of which is to reduce diesel particulate matter and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.

All commercial diesel vehicles are subject to 13 California Code of Regulations § 2485 limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading must be limited to five minutes, and electric auxiliary power units should be used whenever possible.

The GP/CLUP Final EIR found that use of the dust control measures identified above during construction would reduce short-term impacts to sensitive receptors associated with construction-related emissions of dust and PM_{10} to less than significant levels. The GPA could result in an increase in short-term construction-related impacts because construction activities and resulting diesel emissions would occur near sensitive receptors such as the residences adjacent to the project site. The implementation of the diesel emission reduction measures listed above, and compliance with applicable GP/CLUP policies protecting air quality, would reduce construction-related air quality impacts to less than significant.

Long-Term Class II Impacts

The GP/CLUP Final EIR found that no long-term Class II air quality impacts (significant impacts reduced to less than significant with mitigation) would result from GP/CLUP implementation.

The proposed GPA would allow residential development to be constructed within 500 feet of the U.S. 101 freeway, which would have the potential to expose future residents to elevated concentrations of diesel particulate matter emitted primarily by passing trucks. Long-term exposure to diesel particulate matter has the potential to result in significant health-related effects that were not evaluated by the GP/CLUP. Therefore, the proposed GPA has the potential to result in an additional potentially significant impact. This impact, however, would be reduced to a less than significant level through the implementation of GP/CLUP policies, including Safety Element Policy SE 1: Safety in General, which states "*avoid siting of development or land use activities in hazardous areas, and where this is infeasible, require appropriate mitigation to lessen or minimize exposure to hazards.*" Implementation of this policy would require that future development on the project site demonstrate that appropriate measures have or can be included in

the project's design that would reduce exposure to diesel particulate matter impacts to a less than significant level. Therefore, with the implementation of measures related to reducing potential diesel particulate matter exposure, the GPA would not result in additional significant impacts that cannot be reduced to a less than significant level.

Class III Impacts

Impact 3.3-2 GP/CLUP Growth Projections Are Consistent with the Clean Air Plan.

Vehicle use, energy consumption, and associated air pollutant emissions are directly related to households and population growth. SBCAPCD'S 2013 Clean Air Plan (CAP) relies on the most recent households/population estimates developed by the Santa Barbara County Association of Governments (SBCAG), which acts as the Metropolitan Planning Organization (MPO) for Santa Barbara County. The household/population forecasts upon which the Santa Barbara County CAP are then used to estimate future emissions, also known as emissions inventories. These emission inventories are a factor used by the SBCAPCD to devise appropriate strategies to attain state and federal air quality standards. When household/population growth exceeds those forecasts, emissions inventories could be surpassed, which could adversely affect attainment of air quality standards.

The emission planning inventory is used to forecast emissions for Santa Barbara County to determine whether the 2013 CAP will reduce emissions enough to attain the State mandated 1-hour ozone standard while accounting for the growth that is expected in Santa Barbara County. To forecast future year emissions, estimates of the changes in the level of pollution-producing activities, known as activity indicators, are used. Examples of activity indicators include population, housing, employment, daily vehicle miles traveled, and daily vehicle hours.

According to the 2010 United States Census, the City's population was 28,888. Using this population figure as a baseline and adding the population increase resulting from GP/CLUP buildout (8,212), the City's population at GP/CLUP buildout in 2030 would be approximately 38,100. The proposed GPA would add 77 persons to the City's 2030 buildout population, resulting in a population of 38,177, which would be approximately 0.2% higher than the City's buildout population without the GPA (see section 4.10 of this SEIR, Population and Housing, for additional information).

SBCAG's 2010-2040 Regional Growth Forecast, which was used in the preparation of the 2013 CAP, projected the City's population to be 33,912 in the year 2035. A population of 33,912 would be 4,265 fewer people than the GP/CLUP buildout plus the proposed GPA population. The difference between the projected buildout population (with and without the GPA) and the Regional Growth Forecast would not result in a significant increase in emissions forecasted within Santa Barbara County by the 2013 CAP. Future development on the project site would be located near several employment centers in the City, which would be consistent with efforts by the CAP to implement transportation performance standards that will provide a substantial reduction in the rate of increase in passenger vehicle trips and vehicle miles traveled (VMT). A reduction in county-wide VMT is identified by the CAP as a major component of an overall strategy to reduce mobile emissions of ozone precursor pollutants (NOx and ROG) and to

achieve attainment of the State mandated 1-hour ozone standard. Future development on the project site would also be required to comply with SBCAPCD Rules related to air emissions and would contribute to programs to offset project-related contributions to congestion in the City, such as the Goleta Transportation Improvement Program. Therefore, the GPA would not conflict with the 2013 CAP or obstruct its implementation. The GPA's impacts with respect to consistency with the 2010 CAP would be less than significant (Class III).

The GP/CLUP Final EIR also identified the following plans and policies to further reduce impacts of GP/CLUP buildout to a less than significant level:

- Adherence to the requirements of the State Implementation Plan (SIP).
- Adherence to the provisions of the CAP.
- Implementation of CARB-recommended techniques in Table 4.3-5.

The proposed GPA could result in residential development located within 500 feet of a freeway. Please refer to the analysis of long-term Class II air quality impacts provided above. The GPA would not facilitate the development of distribution centers, dry cleaners, gasoline dispensing facilities or the other uses identified on Table 4.3-5.

In addition, the GP/CLUP Final EIR identified policies that would further reduce Impact 3.3.2 through the control of air emissions from construction, new development energy conservation, and transportation- and land use-related requirements. These policies apply City-wide and would be applicable to the GPA, thereby ensuring impacts would remain less than significant with the implementation of the GPA.

Table 4.3-5
Recommendations on Siting New Sensitive Land Uses

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000+ vehicles per day, or rural roads with 50,000+ vehicles per day.
Distribution Centers	Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU units operations exceed 300 hours per week). Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Rail Yards	Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	Avoid siting new sensitive land uses immediately downwind of ports in the most heavily impact zones. Consult with SBCAPCD or CARB on the status of pending analysis of health risks.
Refineries	Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with SBCAPCD to determine an appropriate separation.
Chrome Platers	Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners using Perchloroethylene	Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operation with two or more machines, provide 500 feet. For operations with three or more machines, consult with SBCAPCD. Do not site new sensitive land uses in the same building with dry cleaning operations.
Gasoline Dispensing Facilities	Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gas dispensing facilities.

Impact 3.3-3. The GP/CLUP Rate of Increase in Vehicle Miles Traveled Is Greater than the Rate of Population Growth for the Same Area.

The GP/CLUP Final EIR found that implementation of development under the GP/CLUP would result in an annual average vehicle miles traveled (VMT) growth rate of 1.15%, which was greater than the rate of population growth for the Goleta region as projected by the 2004 CAP referenced in the GP/CLUP Final EIR. However, the GP/CLUP Final EIR concluded that buildout would be consistent with the 2004 CAP and other regional plan strategies, such as the SBCAG's Regional Transportation Plan, to reduce the number of trips and the length of trips in the region and to improve the balance between jobs and housing at the subregional level. Because the GP/CLUP would facilitate the development of housing opportunities close to employment centers and transportation hubs, the GP/CLUP Final EIR found that the GP/CLUP was consistent with the goals and policies of the SBCAG's Regional Transportation Plan and 2004 CAP. The GP/CLUP Final EIR found this to be an adverse, but less than significant impact.

The GPA would result in an incremental increase in the growth rate of annual average VMT. However, the GPA would also facilitate housing opportunities close to employment centers. Therefore, the GPA would be consistent with the goals and policies of the Regional Transportation Plan and the 2013 CAP.

The GP/CLUP Final EIR found that adherence to the requirements of the SIP, the provisions under the 2013 CAP, and the air quality policies addressed under the land use and conservation elements in the GP/CLUP would ensure impacts remain less than significant. These requirements, provisions, and policies apply City-wide and therefore would also be applicable to the GPA, thereby ensuring impacts would remain less than significant with the GPA.

Impact 3.3-4 Long-term Operational Contributions to Air Pollutant Emissions as a Result of GP/CLUP Buildout.

The GP/CLUP Final EIR identified less than significant impacts associated with operational emissions created by stationary sources including the use of natural gas, landscape maintenance equipment, consumer products such as aerosol sprays, and various industrial and commercial processes (e.g., dry cleaning) allowed under the GP/CLUP. It found these non-vehicular operational emissions would represent an adverse but less than significant impact to air quality and that such emissions would be regulated and permitted on a project-by-project basis.

The GPA would allow for a potential increase in development above the level considered in the GP/CLUP, which would result in a minor increase in operational emissions related to the use of natural gas, landscape maintenance equipment, and consumer products (but not from industrial and commercial processes). The GPA would incrementally increase Impact 3.3-4, but would not change its classification as a Class III impact (less than significant).

Class IV Impacts

The GP/CLUP Final EIR did not identify any short- or long-term beneficial (Class IV) impacts to air quality that would result from GP/CLUP implementation. Development resulting from buildout of the GP/CLUP would not cause any short-term or long-term improvements to air quality. Similarly, the additional development resulting from the GPA would also not cause any short- or long-term Class IV impacts.

4.3.5 Cumulative Impacts

Impact 3.3-5 Cumulative ROG and NO_X Emissions.

The GP/CLUP Final EIR identified a significant contribution to cumulative increases in air emissions within the South Central Coast Air Basin that would adversely affect the ability of local agencies to achieve the goals and objectives of the 2004 CAP. Because Santa Barbara County is in nonattainment of state standards for ozone emissions, and any project-generated new ozone precursor (ROG and NO_X) emissions could exacerbate such nonattainment, the GP/CLUP buildout's contribution to cumulative levels of ozone emissions was considered significant and unavoidable (Class I). The emissions associated with development facilitated by

the GPA would also exacerbate the project area's nonattainment status. Impact 3.3-5, however, would remain at Class I if the GPA were implemented.

Impact 3.3-6 Cumulative PM_{10} Emissions.

The GP/CLUP Final EIR identified an adverse but less than significant contribution to cumulative air quality impacts related to PM_{10} emissions because implementation of Goleta Municipal Code Chapter 15.09 (Grading, Erosion and Sediment Control) and SBCAPCD dust-control measures would ensure any project's contribution to cumulative levels of PM_{10} emissions would be less than significant (see Impact 3.3-1 above for a description of PM_{10} emissions resulting from GP/CLUP buildout).

Development associated with the GPA would incrementally increase potential PM_{10} emissions. However, development would also be subject to standard City grading regulations and SBCAPCD dust-control measures. Therefore, the GPA's contributions to cumulative levels of PM_{10} emissions would also be less than significant. The GPA would incrementally increase Impact 3.3-6, but would not change its classification as a Class III impact (less than significant).

Impact 3.3-7 Long-term Cumulative Operational Contributions to Greenhouse Gas Emissions.

The GP/CLUP Final EIR did not evaluate the potential contribution to GHG emissions from GP/CLUP implementation. The 2009 Supplemental EIR for the Track 3 GP/CLUP amendments did evaluate GHG emissions resulting from the implementation of the original 2006 GP/CLUP as follows:

- **Transportation emissions:** new vehicle CO_2 emissions would result from new residential, commercial, industrial, and public service development.
- **Direct energy consumption emissions:** new buildings would consume natural gas for heating, cooking, and other processes and other area sources.
- **Indirect electricity emissions:** new buildings would consume electricity.
- **Industrial emissions:** new industries would also consume fossil fuels and other GHGs for industrial purposes.
- **Emissions associated with landfills:** development would result in increased generation of waste, which would require disposal in a landfill, which would increase methane emissions.
- **Agricultural emissions:** no net expansion in agricultural development would be expected so no new emissions from agricultural operations would occur.
- **Emissions associates with land use changes:** development would result in conversion of natural vegetation and agricultural lands that would result in the loss of carbon sinks.

Cumulative GHG emissions associated with implementation of the GP/CLUP would result in a Class II air quality impact (ICF Jones & Stokes 2009). Given the continued evolution

of climate change analyses, the City has not formalized GHG thresholds within its Thresholds Manual (City of Goleta 2008). However, as part of the mitigation implementation for the Track 3 GP/CLUP amendments adopted on November 17, 2009, the City adopted Implementation Action CE-IA-5, which required the City to develop a greenhouse gas inventory and related plan. The City's Climate Action Plan, adopted in July 2014, is the final result of Implementation Action CE-IA-5 and identifies a target of 11 percent below 2007 emissions for emissions in 2020 and 26 percent below 2020 levels for 2030. In addition, the City's 2014 Climate Action Plan includes several reduction categories of GHG sources and associated reduction measures. The Climate Action Plan is intended to address City-sponsored projects and operations as well as private development subject to ministerial and/or discretionary approval by the City.

The City's Climate Action Plan includes the following reduction measures:

- The Building Energy measures aim to reduce GHG emissions by improving the energy efficiency of both new and existing residential and commercial buildings, increasing the use of renewable energy sources and improving community-wide understanding of energy management.

- The On-Road Transportation and Land Use measures focus on reducing emissions by reducing VMT through multimodal transportation options, reduces emissions by supporting design guidelines that will result in more compact, walkable, and transit-accessible neighborhoods.

- The Water Consumption measure aims to reduce water demand and conserve water, thereby saving energy and avoiding associated emissions under the water energy nexus.

- The Off-Road Transportation and Equipment measures aim to increase use of alternative fuels in construction and landscaping off-road equipment and vehicles and reduce the consumption of fossil fuels.

- The Solid Waste measures reduce emissions by diverting waste from landfills, and supports continual improvement in equipment and operations for landfill management.

All new residential buildings must comply with the California Building Code (CBC) as adopted by the GMC, the Green Building Code as adopted by GMC § 15.12.010, and GMC Chapter 15.13, the City's Energy Efficiency Standards, to meet the objectives of GHG emissions reductions under AB 32.

The GPA would result in an incremental contribution to GHG emissions, as listed above, especially related to transportation emissions, direct energy consumption emissions, indirect electricity emissions, emissions associated with landfills, and emissions associated with land use changes. The GP/CLUP Final EIR found that compliance with air quality policies addressed under the energy, land use and conservation elements in the GP/CLUP, would ensure impacts remain less than significant. These requirements, provisions, and policies apply City-wide and

would also be applicable to the GPA, ensuring impacts would remain less than significant. The GPA would incrementally increase Impact 3.3-7 but would not change its classification as a Class II impact.

4.3.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to GP/CLUP policies are required.

Other Suggested Mitigation. No mitigation is required.

Residual Impacts. The GP/CLUP Final EIR found that all Class II air quality impacts would be reduced to less than significant levels, but that the residual cumulative contribution to ozone emissions within the South Central Coast Air Basin and the resulting effect of such a contribution on the ability of the local government agencies within Santa Barbara County to achieve the goals and objectives of the SBCPACD's 2004 CAP would remain significant and unavoidable (Class I).

Implementation of the GPA would also result in Class II air quality impacts that would be reduced to less than significant levels. However, the GPA would add an incremental increase to the residual cumulative contribution of ozone emissions identified in the GP/CLUP Final EIR. Therefore, the adverse effects on local government agencies within Santa Barbara County to achieve the goals and objectives of the SBCAPCD's 2013 CAP would remain significant and unavoidable.

The 2009 GP/CLUP Supplemental EIR found that all Class II GHG impacts would be reduced to a less than significant level. Implementation of the GPA would also result in Class II GHG impacts that would be reduced to less than significant levels.

4.3.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its air quality impacts are identified below.

Policy CE 12: Protection of Air Quality [GP]

CE 12.1 Land Use Compatibility. [GP]

CE 12.2 Control of Air Emissions from New Development. [GP]

CE 12.3 Control of Emissions during Grading and Construction. [GP]

Policy CE 13: Energy Conservation [GP]

CE 13.1 Energy Efficiency in Existing and New Residential Development. [GP]

CE 13.3 Use of Renewable Energy Sources. [GP]

4.4 BIOLOGICAL RESOURCES

Section 3.4 of the GP/CLUP Final EIR (City of Goleta 2006) describes the following within the City boundary:

- Environmental setting (existing conditions and regulatory setting) for biological resources relating to buildout of the GP/CLUP.
- The impacts associated with biological resources that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

This SEIR provides a programmatic evaluation of potential impacts to biological resources that could result from the proposed GPA. Impacts to biological resources located on and near the project site could be greater or less than what is evaluated below depending on the project-specific design ultimately proposed for the project site.

4.4.1 Physical Setting

The existing conditions description in Section 3.4.1 of the GP/CLUP Final EIR is incorporated by reference into this SEIR, including local and regional setting, habitats, wildlife and fish species, special-status habitats, special-status species, wildlife linkages, and existing preserves.

The approximately 10-acre project site is vacant and is bounded by El Encanto Creek and multi-family residential development on the west, single-family residential development to the north and east, and Calle Real to the south. U.S. Highway 101 is located just beyond Calle Real to the south. Vegetation on the site consists predominately of ornamental trees and shrubs, ruderal species, and annual grassland. A majority of the project site was cultivated in the past but the site is not currently used for agriculture. Two “arm” parcels are part of the project site and extend to the northeast and northwest of the main project parcel. The west “arm” extends to Ellwood Station Road and the east “arm” extends to Daffodil Lane. Both arms are used as walking paths and are fringed by mostly unmaintained landscape vegetation, weedy ruderal plant species, and elm trees.

An above-ground reach of EI Encanto Creek, part of the Devereux Slough watershed, flows north to south adjacent to the western border of the project site entering from a culvert at the northwest corner of the site and exiting into a culvert under Calle Real and the freeway. Although El Encanto Creek is not within the project site, a small portion of the riparian canopy associated with the creek overhangs the boundary of the project site. Pursuant to the GP/CLUP Conservation Element CE Subpolicy 2.2, a Streamside Protection Area extends 100 feet on either side of the creek. The City of Goleta right-of-way on the north side of Calle Real contains a drainage ditch capturing local street runoff. Overall, the project site is essentially an infill parcel surrounded by development on all sides.

4.4.2 Regulatory Setting

The description of the regulatory framework in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the descriptions of federal, state, and local regulations. Since the GP/CLUP Final EIR was prepared, the California Department of Fish and Game changed its name to the California Department of Fish and Wildlife.

4.4.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta Environmental Thresholds and Guidelines Manual

The City's adopted Thresholds Manual provides environmental thresholds specific to biological resources. This manual primarily uses Appendix G of the CEQA Guidelines for its criteria, which states that a project would have a significant impact on the environment if it exceeds any of the following thresholds:

- Conflicts with adopted environmental plans and goals of the community where it is located.
- Substantially affects a rare or endangered species of animal, plant, or the habitat of the species.
- Interferes substantially with the movement of any resident or migratory fish or wildlife species.
- Substantially diminishes habitat for fish, wildlife, or plants.

Determination of impacts is done on a project-by-project basis. Because of the complexity of biological resource issues, substantial variation can occur between projects. Impact assessment must account for both short-term and long-term impacts. Impacts are classified as significant or less than significant, depending on the size, type, and timing of the impact and the biological resources involved. Disturbance to habitats and/or species is considered significant if it affects significant biological resources in one or more of the following ways:

- Substantially reduces or eliminates species diversity or abundance.
- Substantially reduces or eliminates quantity or quality of nesting areas.
- Substantially limits reproductive capacity through loss of individuals or habitat.
- Substantially fragments, eliminates, or otherwise disrupts foraging areas and/or access to food sources.
- Substantially limits or fragments the geographic range or dispersal routes of species.
- Substantially interferes with natural processes, such as fire or flooding, upon which the habitat depends.

Policy-related impacts to biological resources may be considered less than significant where there is little or no importance to a given habitat and where disturbance would not create a significant impact. For example, disturbance to cultivated agricultural fields or small acreages of nonnative, ruderal habitat would be considered less than significant.

CEQA Thresholds

The City also assesses impacts based on the CEQA Guidelines. As suggested by Appendix G of the CEQA Guidelines, the proposed project may have a significant impact on biological resources if it would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the DFW or U.S. Fish and Wildlife Service (USFWS).
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the DFW or USFWS
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

CEQA Guidelines Appendix G also identifies the following criteria for determining whether a project's biological impacts would trigger mandatory findings of significance:

- Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?
- Does the project have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

4.4.4 Impact Evaluation

Class I Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify any Class I impacts (significant and unavoidable impacts) related to biological resources. Any short-term or long-term impacts to biological resources resulting from buildout of the GP/CLUP are categorized as either Class II or Class III, as described below. No additional Class I impacts would result from the GPA. Any incremental increases in short-term or long-term impacts resulting from additional development allowed by the GPA would still be categorized as Class II or Class III.

Class II Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class II impacts (significant impacts reduced to less than significant with mitigation) related to biological resources.

Short-term Impacts

Impact 3.4-1 Temporary Impacts to Special-status Habitats and Special-status Species.

The GP/CLUP Final EIR identified significant impacts associated with construction of planned land uses, which would have the potential to temporarily remove or degrade special-status habitats and temporarily affect special-status species. Development that would be allowed by the GPA could potentially impact the western pond turtle, a special-status species that was observed in the deep pool habitat within El Encanto Creek outside of the project site. Western pond turtle was not identified on GP/CLUP Final EIR Table 3.4-2 (Special Status Species Associated with Habitats in the City), therefore, the GPA could result in an increase in construction-related impact. It is anticipated that short-term construction-related impacts to western pond turtle could be reduced to a less than significant level by avoiding its habitat area during construction.

The GP/CLUP Final EIR identified wildlife and habitat protection policies that are applicable to the GPA and are incorporated here by reference. Specifically, Conservation Element CE Subpolicy 2.2 requires the establishment of a Streamside Protection Area that would extend 100 feet onto the project site. Other policies that would minimize temporary impacts include those related to environmentally sensitive habitat areas including creeks, wetlands, and riparian areas as well as other specific habitat protections, watershed management and water quality, park and open space uses, trails and bikeways, and protection of special-status species. The GP/CLUP Final EIR determined that implementation of these policies would reduce Impact 3.4-1 to a less than significant level. Similarly, these policies would also reduce impacts associated with the GPA to less than significant levels. The GPA would incrementally increase Impact 3.4-1 but would not change its classification as a Class II impact (less than significant with mitigation).

Long-term Impacts

Impact 3.4-2 Loss of Special-status Habitats.

The GP/CLUP Final EIR identified significant impacts associated with permanent loss of special-status habitats, including 40 acres of Environmentally Sensitive Habitat Areas (ESHAs). The project site has been extensively disturbed and as a result has little habitat value. However, development that would be allowed by the GPA would have the potential to result in loss of special-status habitat because the project site is adjacent to a riparian ESHA (El Encanto Creek) identified in the GP/CLUP Final EIR and the buffer for that ESHA extends onto the project site.

If a project design for the project site were to include project components within the 100-foot SPA buffer, such as roads, residences, drainage or recreational facilities, significant impacts on the ESHA could occur. Potential impacts that could result if the SPA buffer were reduced to a width of less than 100 feet but at least 25 feet[3] could include water quality impacts in the ESHA due to grading, vegetation removal, exposed soil, introduction of hazardous materials, and erosion. During the occupancy phase, pollutants such as pesticides, herbicides, fertilizers, oil, and grease could impact water quality in the ESHA. Depending on the severity of these impacts, the impact on the ESHA could be significant.

The GP/CLUP Final EIR identified wildlife and habitat protection policies that are applicable to the GPA. Policies include those related to environmentally sensitive habitat areas including creeks, wetlands, and riparian areas as well as other specific habitat protections, watershed management and water quality, park and open space uses, trails and bikeways, and protection of special-status species. The GP/CLUP Final EIR determined that implementation those policies would reduce Impact 3.4-2 to a less than significant level.

Implementation of the identified policies would reduce impacts associated with the additional development allowed by the GPA to less than significant levels if a 100-foot SPA buffer were provided. If the SPA buffer width were reduced to less than 100 feet but at least 25 feet, impacts on the ESHA could be significant after mitigation. Therefore, the GPA could incrementally increase Impact 3.4-2 and may change its classification to Class I (significant after mitigation) from a Class II impact (less than significant with mitigation) if future development on the project site facilitated by the GPA were to reduce the SPA buffer in such a manner that resulted in impacts to the ESHA.

[3] The requirements of Conservation Element CE Subpolicy 2.2 would not allow the SPA buffer to be reduced to less than 25 feet.

Impact 3.4-3 Long-term Degradation of Special-status Habitats.

The GP/CLUP Final EIR identified significant impacts associated with long-term degradation of special-status habitats, including increased occurrence of invasive non-native species, changes in hydrology and water flow, or disturbances from unauthorized recreation activities. The project site has been extensively disturbed and as a result has little habitat value. Development that would be allowed by the GPA, however, would have the potential to result in impacts to special status habitats because the project site is adjacent to a riparian ESHA identified in the GP/CLUP Final EIR.

The GP/CLUP Final EIR identified wildlife and habitat protection policies that are applicable to the GPA. Policies include those related to environmentally sensitive habitat areas including creeks, wetlands, and riparian areas as well as other specific habitat protections, watershed management and water quality, park and open space uses, trails and bikeways, and protection of special-status species. The GP/CLUP Final EIR determined that implementation those policies would reduce Impact 3.4-3 to a less than significant level.

Implementation of the identified policies would reduce impacts associated with the additional development allowed by the GPA to less than significant levels because future development on the project site would be required to avoid direct (i.e., removal) impacts and minimize potential indirect (i.e., water quality, lighting, etc.) impacts to the on-site ESHA. Therefore, the GPA could increase Impact 3.4-3 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.4-4 Fragmentation of Special-status Habitats.

The GP/CLUP Final EIR identified significant impacts associated with fragmentation of areas with special-status habitats, especially riparian corridors. The project site has been extensively disturbed and as a result has little habitat value. Development that would be allowed by the GPA, however, would have the potential to impact special status habitats because the project site is adjacent to a riparian ESHA identified in the GP/CLUP Final EIR.

The GP/CLUP Final EIR identified wildlife and habitat protection policies that are applicable to the GPA. Policies include those related to environmentally sensitive habitat areas including creeks, wetlands, and riparian areas as well as other specific habitat protections, watershed management and water quality, park and open space uses, trails and bikeways, and protection of special-status species. The GP/CLUP Final EIR determined that implementation those policies would reduce Impact 3.4-4 to a less than significant level.

Implementation of the identified policies would reduce impacts associated with the additional development allowed by the GPA to less than significant levels because future development on the project site would be required to avoid direct (i.e., removal) impacts and minimize potential indirect (i.e., water quality, lighting, etc.) impacts to the on-site ESHA. Therefore, the GPA could increase Impact 3.4-4 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.4-5 Harm to Listed Species.

The GP/CLUP Final EIR identified significant impacts associated with harm to listed species, including vernal pool fairy shrimp (*Branchinecta lynchi*), Southern California steelhead (Southern California ESU) (*Oncorhynchus mykiss irideus*), tidewater goby (*Eucyclogobius newberryi*), red-legged frog (*Rana aurora draytonii*), Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), California brown pelican (*Pelecanus occidentalis californicus*), burrowing owl (*Athene cunicularia*), California least tern (*Sterna antillarum browni*), least Bell's vireo (*Vireo bellii pusillus*), light-footed clapper rail (*Rallus longirostris levipes*), peregrine falcon (*Falco peregrinus anatum*), and western snowy plover (*Charadrius alexandrinus nivosus*). The habitats of these species are subject to federal and State regulations as well local ordinances and policies that are designed to protect the species from impacts. However, it is possible other species may be proposed for listing and become listed during implementation of the GP/CLUP. The California brown pelican and peregrine falcon have both been state and federally delisted, in 2009 for the state and 2009 and 1999, respectively, for the federal Endangered Species Act.

The project site has been extensively disturbed and as a result has little habitat value. However, the GPA would have the potential to result in impacts to listed species because the project site is adjacent to a riparian ESHA identified in the GP/CLUP Final EIR that could potentially provide habitat for the California red-legged frog. The additional development that could be approved by adopting the GPA would increase the potential exposure of this listed species to harm.

The GP/CLUP Final EIR identified wildlife and habitat protection policies that are applicable to the GPA. Policies include those related to ESHAs including creeks, wetlands, and riparian areas as well as other specific habitat protections, watershed management and water quality, park and open space uses, trails and bikeways, and protection of special-status species. The GP/CLUP Final EIR determined that implementing the identified policies would reduce Impact 3.4-5 to a less than significant level because future development on the project site would be required to avoid direct (i.e., removal of habitat or other biological resources) impacts and minimize potential indirect (i.e., water quality, lighting) impacts to the on-site ESHA. If, however, the 100-foot SPA buffer were reduced by subsequent development projects on the project site, and that reduction resulted in an increase in human presence, lighting, or other potential impacts to the adjacent ESHA, impacts on special-status wildlife could be increased, but would remain less than significant with mitigation (Class II).

Impact 3.4-6 Loss, Reduction, or Isolation of Local Populations of Native Species.

The GP/CLUP Final EIR identified significant impacts associated with loss, reduction, or isolation of local populations of native species, primarily from habitat loss and degradation. The project site has been extensively disturbed and as a result has little habitat value. However, the GPA would have the potential to result in impacts to native species because the project site is adjacent to a riparian ESHA identified in the GP/CLUP Final EIR. Developing vacant land not previously considered in the GP/CLUP Final EIR as a result of the GPA would increase the potential for habitat loss and degradation.

The GP/CLUP Final EIR identified wildlife and habitat protection policies that are applicable to the GPA. Policies include those related to environmentally sensitive habitat areas including creeks, wetlands, and riparian areas as well as other specific habitat protections, watershed management and water quality, park and open space uses, trails and bikeways, and protection of special-status species. The GP/CLUP Final EIR determined that implementation those policies would reduce Impact 3.4-6 to a less than significant level.

Implementation of the identified policies would reduce impacts associated with the additional development allowed by the GPA to a less than significant level because future development on the project site would be required to avoid direct (i.e., removal of habitat or other biological resources) impacts and minimize potential indirect (e.g., water quality, lighting) impacts to the on-site ESHA. Therefore, the GPA could incrementally increase Impact 3.4-6 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.4-7 Reduction in Amount or Quality of Habitat for Special-status Species.

The GP/CLUP Final EIR identified significant impacts associated with reduction of the amount and/or quality of habitat available for special-status species. The project site has been extensively disturbed and as a result has little habitat value. However, the GPA would have the potential to result in impacts to special status species because the project site is adjacent to a riparian ESHA identified in the GP/CLUP Final EIR. Development of the project site could increase the potential for a reduction in the amount or quality of habitat for special-status species that could inhabit the riparian ESHA.

The GP/CLUP Final EIR identified wildlife and habitat protection policies that are applicable to the GPA and are incorporated here by reference. Policies include those related to environmentally sensitive habitat areas including creeks, wetlands, and riparian areas as well as other specific habitat protections, watershed management and water quality, park and open space uses, trails and bikeways, and protection of special-status species. The GP/CLUP Final EIR determined that implementation these policies would reduce Impact 3.4-7 to a less than significant level because future development on the project site would be required to avoid direct (i.e., removal of habitat or other biological resources) impacts and minimize potential indirect (e.g., water quality, lighting) impacts to the on-site ESHA.

Implementation of the applicable policies identified in Section 4.4.7 would ensure that additional development allowed by the GPA does not result in significant impacts. Therefore, the GPA could incrementally increase Impact 3.4-7, but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.4-8 Break or Impairment of Functions of Existing Wildlife Linkages.

The GP/CLUP Final EIR identified significant impacts associated with breaking or impairing the functions of existing wildlife functions, specifically along riparian corridors. The project site has been extensively disturbed and as a result has little habitat value. However, development that could be allowed after the GPA was adopted would have the potential to result

in impacts to wildlife linkages because the project site is adjacent to a riparian ESHA identified in the GP/CLUP Final EIR.

The GP/CLUP Final EIR identified wildlife and habitat protection policies that are applicable to the GPA and are incorporated here by reference. Policies include those related to ESHAs including creeks, wetlands, and riparian areas as well as other specific habitat protections, watershed management and water quality, park and open space uses, trails and bikeways, and protection of special-status species. The GP/CLUP Final EIR determined that implementing these policies would reduce Impact 3.4-8 to a less than significant level. If, however, the 100-foot SPA buffer were reduced by subsequent development projects on the project site, and that reduction resulted in an increase in human presence, lighting, or other potential impacts to the adjacent ESHA, impacts on special-status wildlife could be increased, but would remain less than significant with mitigation (Class II).

Impact 3.4-9 Loss or Degradation of Conserved Habitat.

The GP/CLUP Final EIR identified significant impacts associated with biological resources in areas of conserved habitat. The project site has been extensively disturbed and as a result has little habitat value. Development that could be subsequently approved after the GPA would have the potential to result in this impact because the project site is adjacent to a riparian ESHA identified in the GP/CLUP Final EIR.

The GP/CLUP Final EIR identified wildlife and habitat protection policies that are applicable to the GPA and are incorporated here by reference. Policies include those related to environmentally sensitive habitat areas including creeks, wetlands, and riparian areas as well as other specific habitat protections, watershed management and water quality, park and open space uses, trails and bikeways, and protection of special-status species. The GP/CLUP Final EIR determined that implementation these policies would reduce Impact 3.4-9 to a less than significant level because future development on the project site would be required to avoid direct (i.e., removal of habitat or other biological resources) impacts and minimize potential indirect e.g., water quality, lighting) impacts to the on-site ESHA.

Implementation of the applicable policies would reduce impacts associated with the additional development allowed by the GPA to less than significant levels. Therefore, the GPA could incrementally increase Impact 3.4-9 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.4-10 Inconsistency with Approved Conservation Program or Local Conservation Policy.

The GP/CLUP Final EIR identified significant impacts associated with proposed activities that are inconsistent with approved conservation plans and local conservation policies for special-status species. The GPA would have the potential to result in this impact because the project site is adjacent to a riparian ESHA identified in the GP/CLUP Final EIR.

Future development on the project site could increase the potential for conflicts with habitat and special-status species protection policies associated with the preservation and

protection of riparian ESHA that is adjacent to the project site. The GP/CLUP Final EIR identified wildlife and habitat protection policies that are applicable to the GPA, including policies related to environmentally sensitive habitat areas including creeks, wetlands, and riparian areas as well as other specific habitat protections, watershed management and water quality, park and open space uses, trails and bikeways, and protection of special-status species. The GP/CLUP Final EIR determined that implementation these policies would reduce Impact 3.4-10 to a less than significant level.

Implementation of a 100-foot SPA buffer on the project site would be consistent with the requirements of GP/CLUP Subpolicy CE 2.2. However, if future development on the project site is approved that does not provide a 100-foot SPA buffer, such development could be inconsistent with Subpolicy CE 2.2 if the reduced buffer resulted in significant impacts to the ESHA and/or it is determined that there is a feasible alternative to the project that would not reduce the width of the SPA buffer If alternatives to reducing the SPA buffer are determined to not be feasible and the SPA reduction would not result in significant impacts to ESHA, then the future project's impact could be Class II because the project would be consistent with Subpolicy CE 2.2.

Class III Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class III impacts (less than significant impacts) related to biological resources.

Impact 3.4-11 Impacts to Non-special-status Habitats and Species.

The GP/CLUP Final EIR identified less than significant impacts associated with activities that would remove or degrade non-special-status habitats or adversely affect non-special-status species. The GP/CLUP Final EIR determined that the GP/CLUP would not substantially impact the non-special-status habitats and species. Development that would be allowed by the GPA would also result in impacts to non-special-status species, such as removal of non-native vegetation. Therefore, the GPA would incrementally increase Impact 3.4-11, but would not change its classification as a Class III impact (less than significant).

Class IV Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class IV impacts (beneficial) related to biological resources.

Impact 3.4-12 Resources Not Affected by Maintenance/Management.

The GP/CLUP Final EIR found that the maintenance/management of roads, trails, parks, and public facilities within the City's open space preserves would entail activities that would not fragment special status habitats or break existing wildlife linkages. The GPA would not affect the management and protection of these resources because the project site is not located near an open space preserve. Therefore the GPA would not result in a change to this impact.

Impact 3.4-13 Protection of ESHAs and Maintenance/Management of Regional and Neighborhood Open Space Areas.

The GP/CLUP Final EIR found that the protection of ESHAs and maintenance/management of regional and neighborhood open space areas, including Lake Los Carneros Natural and Historical Preserve, Sperling Preserve, Santa Barbara Shores Park, and Coronado Preserve have the potential to benefit special-status habitats and species by preserving lands used by special status species. The GPA project site would not affect the management and protection of resources in regional and neighborhood open space areas because the project site is isolated by existing urban development and is not located near the identified areas. Therefore, beneficial (Class IV) impacts would remain after implementation of the GPA.

4.4.5 Cumulative Impacts

Impact 3.4-14 Cumulative Impacts to Biological Resources.

The GP/CLUP Final EIR identified significant cumulative impacts on biological resources in the region, but found that contributions to these cumulative impacts resulting from the implementation of the GP/CLUP would be reduced to less than significant levels (Class III) by compliance with applicable federal and state regulations and the enforcement of GP/CLUP policies protecting biological resources.

The additional development allowed by the GPA on the project site would result in an incremental increase in cumulative impacts on biological resources in the region. Construction and occupation activities that infringe upon the SPA could cumulatively diminish the biological functionality of the riparian habitat along El Encanto Creek. Compliance with federal and state regulations and adopted GP/CLUP policies would reduce the cumulative riparian habitat impacts associated with the GPA to less than significant levels.

The project site provides open habitat for raptor foraging and prey such as rodents and lizards. It has been determined that only the Shelby project (see Table 3.1-1, List of Related Projects - City of Goleta) and a portion of the project site include property that was not considered for development in the GP/CLUP EIR. The total agricultural acreage between the two sites is 19.6 acres. If the property owners started using the land for agricultural purposes, any existing value for foraging would be further reduced because of the need to reduce rodents for optimum productivity.

The cumulative analysis within the GP/CLUP EIR included areas beyond the City of Goleta's boundaries. This cumulative analysis "included future growth within the region including the City of Santa Barbara Municipal Airport, Santa Barbara County from Highway 154 to the eastern City boundary and from Gaviota to the western City boundary, and UCSB. Most of the land outside Goleta city limits that is included in the cumulative projects list is also on parcels zoned for development, with consideration of the cumulative impacts on raptor foraging included in the GP/CLUP EIR." The 19.6 acres involved with the Kenwood and Shelby properties is a very small increment of the total land that has been, is currently, or will be developed in the reasonably foreseeable future. As a result, the proposed project's cumulative impact on raptor foraging habitat is not cumulatively considerable. The contribution does not

increase the loss of foraging habitat impact to a Class I or Class II impact and the Class III impact identified within the certified GP/CLUP FEIR remains. This impact has been minimized by compliance with the General Plan policies outlined in the GP/CLUP EIR. These policies include observing setbacks from historic and active nests during nesting season, limiting disturbance of natural drainage areas and vegetation, and preserving high value habitat, all of which have been included as mitigation measures or will be imposed as a standard conditions of approval for the proposed project. The project's contribution to cumulative effects on loss of raptor foraging habitat do not require additional mitigation.

4.4.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation is required.

Residual Impacts. Project-specific impacts to biological resource resulting from the proposed GPA would be similar to those identified in the GP/CLUP Final EIR and would be reduced to less than significant levels through implementation of GP/CLUP biological resource protection policies. If however, the required SPA buffer is reduced to less than 100 feet, potentially significant impacts could occur, and the significance of those impacts would be dependent upon the project-specific design of the future development project.

4.4.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its biological resource impacts are identified below.

Policy CE 1: Environmentally Sensitive Habitat Area Designations and Policy [GP/CP]

CE 1.1 Definition of Environmentally Sensitive Habitat Areas. [GP/CP]

CE 1.2 Designation of Environmentally Sensitive Habitat Areas. [GP/CP]

CE 1.3 Site-Specific Studies and Unmapped ESHAs. [GP/CP]

CE 1.4 Illegal Destruction of ESHAs. [GP/CP]

CE 1.5 Corrections to Map of ESHAs. [GP/CP]

CE 1.6 Protection of ESHAs. [GP/CP]

CE 1.7 Mitigation of Impacts to EHSAs. [GP/CP]

CE 1.8 ESHA Buffers. [GP/CP]

CE 1.9 Standards Applicable to Development Projects. [GP/CP]

CE 1.10 Management of ESHAs. [GP/CP]

Policy CE 2: Protection of Creeks and Riparian Areas [GP/CP]

CE 2.1 Designation of Protected Creeks. [GP/CP]

CE 2.2 Streamside Protection Areas. [GP/CP]

CE 2.3 Allowable Uses and Activities in Streamside Protection Areas. [GP/CP]

CE 2.4 Dedication of Easements or Other Property Interests. [GP/CP]

CE 2.5 Maintenance of Creeks as Natural Drainage Systems. [GP/CP]

CE 2.6 Restoration of Degraded Creeks. [GP/CP]

Policy CE 8: Protection of Special-Status Species [GP/CP]

CE 8.1 ESHA Designation. [GP/CP]

CE 8.2 Protection of Habitat Areas. [GP/CP]

CE 8.3 Site-Specific Biological Resources Study. [GP/CP]

CE 8.4 Buffer Areas for Raptor Species. [GP/CP]

4.5 CULTURAL RESOURCES

Section 3.5 of the GP/CLUP Final EIR describes the following within the City boundary:

- Environmental setting (existing conditions and regulatory setting) for cultural and paleontological resources relating to buildout of the GP/CLUP.
- The impacts associated with cultural, historic, and paleontological resources that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

4.5.1 Physical Setting

Regional Setting. The existing conditions description in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including prehistorical background, ethnographic background, historical background, and paleontological background.

Project Site Setting. The western edge of a recorded prehistoric archaeological site, CA-SBA-1093 West, is located on the northeast corner of the project site. This site was recorded in 1980 (Craig 1980) and described as "a scatter of weathered shellfish" on a "major promontory overlooking a creek." No other prehistoric tools including chipped stone or ground stone artifacts, or other food remains (animal bone) were identified during a "cursory inspection of the site" (Craig 1980).

In addition to a records search, aerial photographs of the project area from 1929 and 1938 were analyzed as part of the Phase 1 survey. The 1929 photograph indicates minor development of the project area. Structures are visible in the southwest and north-central portions of the project site. The 1938 photograph indicates major development of the project site, as agriculture and numerous dirt roads are visible in the southwestern portion of the site. A "complex" of several structures and possibly trees is visible in the north-central portion of the site. The 1938 photograph also indicates that the project site was graded and/or plowed, ostensibly for agricultural purposes.

Site CA-SBA-1093 West was recorded as extending east onto the adjacent parcel in 1980. However, a later survey of that parcel for development makes no mention of any shell or cultural material in the recorded area of CA-SBA-1093 West.

The entire project site was resurveyed at 15-meter intervals, with shovel scrapes every 15 meters along those transects. Six shell fragments were found during this resurvey, each located across the northern portion of the project site, from the western project boundary to the eastern project boundary. Along with re-survey of the project site, the portion of the CA-SBA-1093 West located on the project site was tested with six shovel probes (Dudek 2009). No prehistoric cultural materials or shellfish were recovered. Finally, a survey of CA-SBA-1093 West site and vicinity was conducted on June 19, 2013, and no prehistoric cultural materials were observed. Given the cursory recording of CA-SBA-1093 West originally, and the subsequent unsuccessful efforts to relocate the site, it appears that CA-SBA-1093 West may never have been more than

an extremely sparse scatter of weathered shell, and that this shell may or may not have been from prehistoric use of the area.

No buildings or other built environment resources are present on the project site. Some historic-period debris is among a clump of palm trees on the northern end of the site, the location of now-demolished structures. Air photo imagery indicates that structures were present at the northern portion of the site between 1929 and 1956, and that they had been removed by 1967. The materials observed at the location of these structures during the recent 2009 survey (Dudek 2009) included old truck tires and wheels and a low-density scatter of glass and ceramic tile fragments.

In a letter dated July 25, 2014, the City invited the local Native American community to a meeting to discuss the Project. No one attended the meeting. Kathleen Pappo of the Barbareño/Ventureño Band of Mission Indians provided a letter in response to the request for consultation and that letter stated that she would like to see some of the land that was formerly occupied by the Chumash Native Americans to remain undeveloped.

4.5.2 Regulatory Setting

The description of the regulatory framework in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the discussions of federal, state, and local regulations.

Assembly Bill 52 (AB 52) went into effect on July 1, 2015 and established a new category of resources in CEQA called "Tribal Cultural Resources" (Public Resources Code § 21074). AB 52 also created a process for consultation with California Native American Tribes in the CEQA process. Tribal Governments can request consultation with a lead agency and give input into potential impacts to tribal cultural resources before the agency decides what kind of environmental assessment is appropriate for a proposed project. The Public Resources Code now requires avoiding damage to tribal cultural resources, if feasible. If not, lead agencies must mitigate impacts to tribal cultural resources to the extent feasible. The Governor's Office of Planning and Research is currently working to update the State CEQA Guidelines to address the evaluation of impacts to tribal cultural resources, as also required by AB 52.

4.5.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta Environmental Thresholds and Guidelines Manual

The City's adopted Thresholds Manual provides specific thresholds for conducting CEQA analysis. Section 8 of the Thresholds Manual, "Cultural Resources Guidelines: Archaeological, Historical, and Ethnic Elements Thresholds," provides guidance for assessing the significance of cultural, archaeological, and historical impacts associated with a proposed project. The City's adopted thresholds indicate that a project would result in a significant impact on a cultural resource if it results in the physical demolition, destruction, relocation, or alteration

of the resource or its immediate surroundings such that the significance of such a resource would be materially impaired.

CEQA Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which identifies the circumstances that can lead to a determination of significant cultural, archaeological, paleontological, or historical impact:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 or disrupt or adversely affect a prehistoric or historic cultural site or affect a property of historic or cultural significance to the community or an ethnic or social group.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

If, based on research, field surveys, and evaluation, a building, structure, site, or feature is determined to not be significant (i.e., not listed or eligible for listing on local, state, or federal register or landmarks lists), then a project would not adversely or significantly affect the resource.

In addition, in compliance with the new requirements of AB 52, an impact would be significant if it would result in a substantial adverse change to a tribal cultural resource. No such resources have been identified at the project site; therefore, no impacts would occur, and this issue is not discussed further.

4.5.4 Impact Evaluation

Class I Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify Class I impacts (significant and unavoidable impacts) related to cultural resources. Any short-term or long-term impacts to cultural resources resulting from buildout of the GP/CLUP are categorized as Class II, as described below. Similarly, no additional Class I impacts would result with the GPA. Any incremental increases in short-term or long-term impacts resulting from additional development allowed by the GPA would still be categorized as Class II.

Class II Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

Impact 3.5-1 Damage to Sites of Cultural, Historical, or Paleontological Significance

The GP/CLUP Final EIR noted that damage to an archaeological site, Native American site, paleontological site, or historic building is, by definition, long-term, as described below in Impact 3.5-2. Exceptions to this might include a temporary impact to the setting, aesthetics, and integrity of a building or structure as the result of adjacent construction. In this instance, projects contiguous to historic buildings or structures could cause short-term, potentially significant but mitigable impacts (Class II). There are no historic buildings or structures located on or adjacent to the project site. Therefore, the GPA would not increase Impact 3.5-1 and would not change its classification as a Class II impact (less than significant with mitigation).

Long-term Impacts

Impact 3.5-2 Loss or Destruction of an Important Historical Building, Archaeological Site, or Paleontological Site

The GP/CLUP Final EIR identified significant impacts associated with the potential for loss or destruction of an important historical building, archaeological site, or historical site. It also identified potential significant impact to paleontological resources in areas of western Goleta and a few other areas in the City. The additional development allowed by the GPA could incrementally increase the potential for loss or destruction of such historical, archaeological, or paleontological resources.

Section 3.5.3.3 of the GP/CLUP Final EIR identified policies that would reduce Impact 3.5-2 to a less than significant level. These polices relate to protection of Native American and paleontological and historic resources, as well as historic and cultural landscapes. As stated in the GP/CLUP Final EIR, some projects within the GP/CLUP may require a mixed strategy to include inventory, excavation, and avoidance/preservation. Elements that comprise the built environment, such as buildings and structures, would typically require onsite preservation; archaeological sites may require data recovery excavation and/or preservation.

A portion of recorded archaeological site CA-SBA-1093 West is located on the northeastern corner of the project site. A 2009 archaeological survey made diligent efforts to re-locate CA SBA-1093 West, but no evidence of the site was found in its mapped location, and testing of the mapped site location yielded no evidence of the site. It is unlikely that future development of the project site would result in significant impacts to CA-SBA-1093, however, there is a low potential for development to encounter previously undetected cultural resources. Implementation of GP/CLUP policies related to the protection of cultural resources would reduce potential impacts associated with the GPA to less than significant levels. Therefore, the GPA would incrementally increase Impact 3.5-2, but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.5-3 Loss or Destruction of Significant Cultural Site

The GP/CLUP Final EIR identified significant impacts associated with potential for loss or destruction of significant cultural, historical, or paleontological resources within the City as a whole. It also identified potential significant impact to paleontological resources in areas of western Goleta and a few other areas in the City. The additional development allowed by the GPA could incrementally increase the potential for similar impacts.

Section 3.5.3.3 of the GP/CLUP Final EIR identified policies that would reduce Impact 3.5-3 to a less than significant level. These polices relate to protection of Native American and paleontological and historic resources, as well as historic and cultural landscapes. As stated in the GP/CLUP Final EIR, some projects within the GP/CLUP may require a mixed strategy to include inventory, excavation, and avoidance/preservation. Elements that comprise the built environment, such as buildings and structures, would typically require onsite preservation; archaeological sites may require data recovery excavation and/or preservation.

These policies and mitigation measures would reduce impacts associated with the GPA to less than significant levels. Therefore, the GPA would incrementally increase Impact 3.5-3 but would not change its classification as a Class II impact (less than significant with mitigation).

Class III Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify Class III impacts (less than significant impacts) related to cultural resources. Any short-term or long-term impacts to cultural resources resulting from buildout of the GP/CLUP are categorized as Class II, as described above. Similarly, no additional Class III impacts would result with the GPA. Any incremental increases in short-term or long-term impacts resulting from additional development allowed by the GPA would still be categorized as Class II.

Class IV Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the potential for Class IV impacts (beneficial impacts) related to cultural resources if future projects and land uses are designed to preserve important cultural resources, to develop cultural landscapes, or to use the discovery and recordation resources in an educational manner that serves the community as a whole. Development projects allowed by the GPA would have similar potential for Class IV impacts.

4.5.5 Cumulative Impacts

The GP/CLUP Final EIR found that policies in the GP/CLUP to protect cultural resources would ensure that contributions to cumulative impacts on cultural, historic, archaeological, and paleontological resources resulting from GP/CLUP buildout would be less than significant. These policies would minimize the degradation of cultural resources on a project-by-project basis, thereby maintaining cumulative impacts within the City as a whole below significant levels.

The same policies in the GP/CLUP would also be applicable to development on the GPA project site. Therefore, the GPA's incremental contribution to cumulative impacts on cultural, historic, archaeological, and paleontological resources would also be less than significant.

4.5.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation is required.

Residual Impacts. Following implementation of the GP/CLUP policies cultural resource impacts of the GPA would be less than significant

4.5.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its cultural resource impacts are identified below.

Policy OS 8: Protection of Native American and Paleontological Resources [GP/CP]

OS 8.1 Definition. [GP/CP]

OS 8.2 Inventory. [GP/CP]

OS 8.3 Preservation. [GP/CP]

OS 8.4 Evaluation of Significance. [GP/CP]

OS 8.5 Mitigation. [GP/CP]

OS 8.6 Monitoring and Discovery. [GP/CP]

OS 8.7 Protection of Paleontological Resources. [GP/CP]

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4.6 GEOLOGY, SOILS AND MINERAL RESOURCES

Section 3.6 of the GP/CLUP Final EIR describes the following within the City boundary:

- Environmental setting (existing conditions and regulatory setting) for geology, soils, and mineral resources relating to buildout of the GP/CLUP.
- The impacts associated with geology, soils, and mineral resources that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

4.6.1 Existing Conditions

The existing conditions description in the GP/CLUP Final EIR, including topography, geology, soils, and mineral resources, is incorporated by reference into this SEIR.

The project site has an elevation of ranging from 55 feet above mean sea level (msl) on the south to 94 feet above msl at the north. The site is located on a slope that dips down to the southwest at an average gradient of 6-to-1 (horizontal-to-vertical) and becomes generally level adjacent to Calle Real. Surface and sub-surface material at the site generally consist of clayey sands and moderately expansive soils. Using the Geologic Map of the Dos Pueblos Quadrangle[6], the material was interpreted to be Monterey Formation overlaid by Older Dissected Surficial Sediments.

There are no California designated Alquist-Priolo active earthquake faults mapped on the project site, nor within the City of Goleta. As shown by the City's GP/CLUP Geological Hazards Map[9], the closest faults to the site are an unnamed fault approximately 1,500 feet southeast of the project site, and the More Ranch and Glen Annie faults are approximately 0.7 miles south and 1.2 miles north of the project site, respectively. Subsequent to the preparation of the GP/CLUP Final EIR, and geologic map prepared by Minor and others (2009) shows the El Encanto fault as being located near the project site. The fault is depicted as trending from southeast to northwest, along and adjacent to Tuolumne Drive north of the project site.

4.6.2 Regulatory Framework

The description of the regulatory framework in the GP/CLUP Final EIR, including the descriptions of federal, state, and local regulations, is incorporated by reference into this SEIR.

4.6.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta Environmental Thresholds and Guidelines Manual

The Geologic Constraints Guidelines adopted by the City establish the following threshold:

"The purpose of these Guidelines is to provide preliminary criteria for determining whether a particular activity could have a potentially significant impact on the environment as described in Section 15064 of the CEQA Guidelines. Because geologic conditions are highly variable within Santa Barbara County, these guidelines are not fixed thresholds upon which a determination of significant impact would be made. They serve to point out when further study of site-specific conditions is required in order to assess geologic impacts. The level of project geologic impacts (i.e. potentially significant, potentially significant but subject to effective mitigation, or not significant) is made by City staff (in consultation with licensed geologists and engineers as necessary) upon review of project plans, proposed mitigation measures and site specific geologic information."

CEQA Thresholds

The City also assesses impacts based on the CEQA Guidelines. As suggested by Appendix G of the CEQA Guidelines, the proposed project may have a significant impact on geology, soils, or mineral resources if it would result in any of the following:

- Expose people or structures to potential substantial adverse effects resulting from the rupture of a known earthquake fault, seismic ground shaking, seismically induced landslides, or liquefaction.
- Be located on a geologic unit or soil that is unstable or would become unstable as a result of the construction or operation of the proposed project.
- Result in substantial accelerated soil erosion and/or the loss of a substantial amount of topsoil.
- Be located on an expansive soil that would create substantial risks to life or property.
- Have soils incapable of supporting the use of onsite wastewater disposal systems.
- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

4.6.4 Impact Evaluation

Class I Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify Class I impacts (significant and unavoidable impacts) related to geology, soils, and mineral resources. Any short-term or long-term impacts related to geology, soils, and mineral resources resulting from buildout of the GP/CLUP are categorized as Class II or Class III, as described below. Similarly, no additional Class I impacts would result with the GPA. Any incremental increases in short-term or long-term impacts resulting from development allowed by the GPA would still be Class II or Class III.

Class II Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class II impacts (significant impacts reduced to less than significant with mitigation) related to geology, soils, and mineral resources.

Short-term Impacts

Impact 3.6-1 Substantial Accelerated Soil Erosion and/or Loss of a Substantial Amount of Topsoil.

The GP/CLUP Final EIR identified significant impacts associated with ground disturbance and vegetation removal during construction, resulting in soil exposure to rain and wind and potentially causing accelerated erosion and deposition of sediment into nearby drainages and/or waterways. Such erosion and sedimentation could result in a short-term increase in turbidity in these waterways, potentially causing water quality degradation. Accelerated erosion and loss of a substantial amount of topsoil resulting from buildout under the GP/CLUP would be a significant impact.

The additional development allowed by the GPA could also result in construction-related erosion impacts. The GP/CLUP Final EIR identified policies addressing construction-related erosion impacts that are relevant to the project site, and the implementation of those policies would reduce construction-related impacts to a less than significant level. In addition, future construction projects on the project site must comply with Goleta Municipal Code Chapter 15.09, Grading, Erosion and Sediment Control, and prepare and implement an approved Stormwater Pollution Prevention Plan (SWPPP). The SWPPP will identify best management practices (BMPs) to prevent substantial soil erosion or loss of substantial topsoil associated with development. Therefore, the GPA would increase Impact 3.6-1 but would not change its classification as a Class II impact (less than significant with mitigation).

Long-term Impacts

Impact 3.6-2 Exposure of People or Structures to Substantial Adverse Effects Resulting from the Rupture of a Known Earthquake Fault, Seismic Ground Shaking, Seismically Induced Landsliding, or Liquefaction.

The GP/CLUP Final EIR identified significant impacts associated with exposure to surface fault rupture, strong ground shaking, seismically induced landslides, and/or liquefaction. The additional development allowed by the GPA could increase the exposure to such seismic hazards and result in similar impacts.

The GP/CLUP Final EIR identified policies related to public safety, seismic hazards and emergency preparedness, and implementation of those policies would reduce potential geologic hazard impacts to a less than significant level. Those policies would also reduce impacts associated with the GPA to less than significant levels. In addition, future construction projects on the project site must comply with Goleta Municipal Code Chapter 15.09, Grading, Erosion and Sediment Control. Therefore, the GPA would increase Impact 3.6-2 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.6-3 Exposure of People or Structures to Substantial Adverse Landslide Effects Resulting from Buildout on Unstable Geologic Units or Soils or Steep Slopes.

The GP/CLUP Final EIR identified significant impacts associated with exposure to landslides in areas of steep slopes or unstable geologic units or soils, particularly in the northern and southern areas of the City.

The GP/CLUP Final EIR identified policies related to public safety and slope stability, and implementation of those policies would reduce potential geologic hazard impacts to a less than significant level. Those policies would also reduce impacts associated with the GPA to less than significant levels. In addition, future construction projects on the project site must comply with Goleta Municipal Code Chapter 15.09, Grading, Erosion and Sediment Control. Therefore, the GPA would increase Impact 3.6-3 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.6-4 Location of Development on Expansive and/or Compressible Soil That Could Lead to Risks to People and Structures.

The GP/CLUP Final EIR identified significant impacts associated with development in areas with expansive and/or compressible soils. The GP/CLUP Final EIR identified policies related to public safety and slope stability, and implementation of those policies would reduce potential geologic hazard impacts to a less than significant level. Those policies would also reduce impacts associated with the GPA to less than significant levels. In addition, future construction projects on the project site must comply with Goleta Municipal Code Chapter 15.09, Grading, Erosion and Sediment Control. Therefore, the GPA would incrementally increase Impact 3.6-4 but would not change its classification as a Class II impact (less than significant with mitigation).

Class III Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class III impacts (less than significant impacts) related to geology, soils, and mineral resources.

Short-term Impacts

The GP/CLUP Final EIR did not identify short-term Class III impacts related to geology, soils, and mineral resources. Any such short-term impacts resulting from buildout of the GP/CLUP are categorized as Class II, as described above. Similarly, no additional Class III impacts would result with the GPA. Any incremental increases in short-term impacts resulting from additional development allowed by the GPA would be considered Class II.

Long-term Impacts

Impact 3.6-5 Exposure of People to Elevated Levels of Indoor Radon

The GP/CLUP Final EIR identified less than significant impacts associated with exposure to Rincon Formation areas capable of emanating radon gas, especially along the City's northern border. The potential for such exposure is considered an adverse but less than significant impact. The additional development allowed by the GPA would by located over the Monterey Formation and would not increase Impact 3.6-5 or change its classification as a Class III impact (less than significant).

Class IV Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify Class IV impacts (beneficial impacts) related to geology, soils, and mineral resources. Buildout of the GP/CLUP is not expected to reduce any hazards related to geology and soils, nor will any mineral resources be preserved as a result of implementation of the GP/CLUP. Similarly, no additional Class IV impacts would occur as a result of additional development allowed by the GPA.

4.6.5 Cumulative Impacts

As described in the GP/CLUP Final EIR, impacts related to geologic processes and/or exposure of people and structures to geologic hazards are generally site-specific and do not interact to constitute a cumulative impact. Therefore, no such cumulative impacts are anticipated as a result of GP/CLUP implementation. Similarly, any such impacts resulting from additional development allowed by the GPA would also not interact to constitute a cumulative impact; therefore no cumulative impacts would result from the GPA.

4.6.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to GP/CLUP) are required.

Other Suggested Mitigation. No additional mitigation is required for the GPA.

Residual Impacts. Implementation of the applicable GP/CLUP policies would reduce potential impacts related geology, soils and mineral resources to less than significant levels (Class II or Class III).

4.6.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its geology, soils and mineral resources impacts are identified below.

SAFETY ELEMENT

Policy SE 1: Safety in General [GP/CP]

SE 1.3 Site-Specific Hazards Studies. [GP/CP]

SE 1.4 Deed Restriction in Hazardous Areas. [GP/CP]

SE 1.5 Subdivision of New Lots in Hazard Areas. [GP/CP]

SE 1.6 Enforcement of Building Codes. [GP]

Policy SE 5: Soil and Slope Stability Hazards [GP/CP]

SE 5.1 Evaluation of Slope-Related Hazards. [GP/CP]

SE 5.2 Evaluation of Soil-Related Hazards. [GP/CP]

SE 5.4 Avoidance of Soil-Related Hazards. [GP/CP]

SE 5.5 Minimization of Grading in Hazardous Areas. [GP/CP]

4.7 HAZARDS AND HAZARDOUS MATERIALS

Section 3.7 of the GP/CLUP Final EIR describes the following within the City boundary:

- Environmental setting (existing conditions and regulatory setting) for hazards and hazardous materials relating to buildout of the GP/CLUP.
- The impacts associated with hazards and hazardous materials that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

4.7.1 Physical Setting

The existing conditions description in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including urban and wildland fire hazards; oil and gas production, processing, and transport hazards; hazardous materials and wastes; hazardous materials disclosure program; hazardous materials incidence response; documented releases of hazardous materials and wastes; airport-related hazards; electromagnetic fields (EMFs); and emergency preparedness.

The project is vacant and was previously used for agricultural purposes. A review of aerial photos indicates that farming operations on the project site ceased sometime around 2005. A Phase 1 Environmental Site Assessment was prepared (Rincon, 2007) for the project site to identify the possible presence of recognized environmental conditions associated with possible soil and groundwater contamination. A recognized environmental condition is defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The Environmental Site Assessment did not detect the presence of aboveground tanks or evidence of underground storage tanks; drums; hazardous substances or petroleum products; unidentified containers; odors; pools of liquid; transformers or hydraulic equipment; or other conditions of concern. The Environmental Site Assessment did conclude that due to the historic use of the site for agriculture, there is a potential that the property could be affected with pesticides or other chemicals used routinely in agricultural production, which represents a recognized environmental condition.

4.7.2 Regulatory Framework

The description of the regulatory framework in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the descriptions of federal, state, and local regulations.

4.7.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta Environmental Thresholds and Guidelines Manual

The City's adopted Thresholds Manual provides specific thresholds for conducting CEQA analysis. Section 14, "Public Safety Thresholds," and Section 9, "Electromagnetic Fields Thresholds," provide guidance for assessing the significance of hazards impacts associated with a proposed project.

The City's adopted thresholds address public safety impacts resulting from involuntary exposure to hazardous materials. These thresholds focus on the activities that include the installation or modification of facilities that handle hazardous materials, transportation of hazardous materials, or nonhazardous land uses in proximity to hazardous facilities. A significant impact with regard to hazards and hazardous materials would be expected to occur if the proposed project (i.e., the GP/CLUP) resulted in an increase of public safety risks that exceed risk-based thresholds contained in the City's Thresholds Manual. For the purposes of this analysis, an impact would be considered significant if it results in an unsafe exposure of people to a variety of hazards or hazardous materials as listed in Section 3.7.1 of the GP/CLUP Final EIR. For hazardous materials releases, determination of whether unsafe exposure levels exist is dependent upon the following: type of hazardous material released, media to which the hazardous material was released (e.g., to air, soil, or water), concentration of which such hazardous material exists in air, soil, or water, duration of the release, and persistence of the hazardous material in the environment. Permissible exposure levels if such releases occur are estimated in the National Institute of Occupational Safety and Health Handbook.

According to the Thresholds Manual, there is potential of significant impact on public safety from a project if any of the following conditions within the proposed development exist:

- Oil wells and gas wells and associated production.
- Gas and hazardous liquid pipelines.
- Oil and/or gas processing and storage facilities.

Hazards and hazardous materials releases associated with these types of facilities, which may result in significant impacts, are discussed in Section 3.7.1.2 of the GP/CLUP Final EIR.

The Thresholds Manual also includes a threshold for EMF exposure—in particular, radio frequency radiation (RFR). No specific threshold has been adopted in the City of Goleta for extremely low frequency (ELF); instead, ELF exposure should be analyzed on a case-by-case basis using the most current scientific data. For RFR, standards have been established for effects resulting from thermal heating of body tissue. The most widely used conservative standards are the Institute of Electrical and Electronic Engineers-American National Standards Institute (IEEE-ANSI) C95.1-1992, which are based on power densities (see Figures 2 and 3 of Section 9, City of Goleta 2003). A significant impact to humans would occur if:

- Humans are exposed to RFR in excess of the IEEE-ANSI C95.1-1992 standard, through the siting of new projects next to RFR sources or through the siting of new RFR sources adjacent to sensitive receptors (If the Federal Communications

Commission [FCC] rulemaking committee adopts a revised standard, said standard shall apply).

CEQA Thresholds

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this document, implementation of the GP/CLUP may have a significant adverse impact related to hazards and hazardous materials if it would result in any of the following:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- Include a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.
- Create a safety hazard for people residing or working in an area within two miles of a public or public use airport.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

4.7.4 Impact Evaluation

Class I Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class I impacts (significant and unavoidable impacts) related to hazards and hazardous materials.

Short-term Impacts

The GP/CLUP Final EIR did not identify short-term Class I impacts involving the creation of a public safety hazard, exposure of people to hazardous materials, or conflicts with any emergency response or evacuation plan. Any such impacts are classified as long-term impacts as they are not of a transient nature. Similarly, no additional short-term Class I impacts would occur as a result of additional development allowed by the GPA.

Long-term Impacts

Impact 3.7-1 Risk of Upset at Venoco Facilities.

The project site is located more than 1.5 miles from the Venoco facilities. While the project site is not in the vicinity of the Venoco facilities, the Class I impacts identified in the GP/CLUP Final EIR would remain. The GPA would not result in changes to Impact 3.7-1 as described in the GP/CLUP Final EIR.

Impact 3.7-2 Transport.

The GP/CLUP Final EIR identified significant impacts associated with exposure of people to risks associated with the transportation of hazardous materials on U.S. 101, State Route 217, Hollister Avenue, and the Union Pacific Railroad (UPRR) tracks. These hazards were considered to be significant.

The project site is approximately 145 feet north of the center median of U.S. 101 and 370 feet north of the UPRR railroad tracks. The probability of the project site being affected by an accidental release of hazardous materials from trains or trucks traveling near the project site is extremely low, however, the consequences of a release could be significant should an accident and major release occur. The GPA would increase the number of people that could reside on the project site, which would incrementally increase potential hazard material exposure risks in the unlikely event of an accident and major release. Therefore, the GPA would contribute to the transport risk impacts in the City but would not increase the severity of the significant and unavoidable impact described in the GP/CLUP Final EIR.

Class II Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

The GP/CLUP Final EIR did not identify Class II impacts (significant impacts reduced to less than significant with mitigation) involving the creation of a public safety hazard, exposure of people to hazardous materials, or conflicts with any emergency response or evacuation plan. Any such impacts are classified as long-term impacts as they are not of a transient nature. Similarly, no additional short-term Class II impacts would occur as a result of additional development allowed by the GPA.

Long-term Impacts

Impact 3.7-3 Risk of Upset at S.L. 421 Wells.

The project site is not near the State Lands (S.L.) 421 wells. Therefore, the GPA would not result in changes to Impact 3.7-3 as described in the GP/CLUP Final EIR.

Impact 3.7-4 Risk of Upset at Ellwood Marine Terminal.

The project site is not near the Ellwood Marine Terminal and the terminal is no longer in operation. Therefore, the GPA would not result in changes to Impact 3.7-4 as described in the GP/CLUP Final EIR.

Impact 3.7-5 Airport.

The project site is not within Airport Clear Zones or Airport one-mile markers. Therefore, the GPA would not result in changes to Impact 3.7-5 as described in the GP/CLUP Final EIR.

Impact 3.7-6 Wildland Fires.

The GP/CLUP Final EIR identified significant impacts associated with wildland fires in areas classified by the California Department of Forestry and Fire Protection (CDF) as wildland fire hazard areas. The project site is not within a wildland fire hazard area. Therefore, the GPA would not result in changes to Impact 3.7-6 as described in the GP/CLUP Final EIR.

Impact 3.7-7 Surface Water.

The GP/CLUP Final EIR identified significant impacts associated with ordinary use or spills of hazardous materials such as fuels, solvents, paint, and other similar substances used during site grading and construction that could adversely affect local surface water quality. These impacts are considered potentially significant. The additional development allowed by the GPA could potentially result in similar impacts during site grading and construction activities.

The GP/CLUP Final EIR stated that implementation of Stormwater Pollution Prevention Plans (SWPPPs) would reduce impact from spills of hazardous materials during construction activities at a project site. Requirements to prepare and implement a SWPPP would also reduce impacts associated with the GPA to a less than significant level. Therefore, the GPA would incrementally increase Impact 3.7-7 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.7-8 Exposure of Population to Listed/Contaminated Sites.

The project site is not a listed/contaminated site as defined by Government Code § 65962.5 and there are no identified contaminates sites located near the project site. Therefore, the GPA would not result in changes to Impact 3.7-8 as described in the GP/CLUP Final EIR.

Impact 3.7-9 Contaminated Soil.

The project site is in an area with past oil development activities that may include contaminated soils. However, no known oil exploration or production activities have occurred on the project site. The California Department of Conservation, Division of Oil, Gas & Geothermal

Resources Well Finder[4] has no record of wells being developed on the project site. Several wells are located within 1,000 feet of the project site, including two dry holes located to the west of the site, and two plugged wells located to the east of the site. The GPA would not result in changes to Impact 3.7-9 as it relates to contamination that may have resulted from former oil production activities.

The project site has historically been farmed; agricultural operations ceased in 2007. Due to the previous use of the project site for agricultural purposes, it is reasonable to assume that herbicides and pesticides were applied to the site sometime in the relatively recent past. If residual concentrations of herbicides and pesticides are present in the project site soil, the disturbance of the site by grading and construction activities could have the potential to result in health impacts to on-site workers and nearby residents, primarily through the creation of dust that could transport contaminants. The potential for the project to result in health-related impacts due to the presence of residual herbicides and pesticides in on-site soils is considered to be a potentially significant and mitigable (Class II) impact.

Policy SE 10.7 (Identification, Transport, and Disposition of Potentially Contaminated Soil) of the City's Safety Element states that if contaminated soils are encountered on the project site the City shall require the preparation and implementation of a Soil Management Plan and a project-specific Health and Safety Plan. Implementation of the required plans would identify measures to remove or remediate contaminated soils in a manner that does not result in significant health effects to persons on or near the project site. Through compliance with these policy requirements the GPA would incrementally increase Impact 3.7-9 but would not change its classification as a Class II impact (less than significant with mitigation).

Class III Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class III impacts (less than significant impacts) related to hazards and hazardous materials.

Short-term Impacts

The GP/CLUP Final EIR did not identify short-term Class III impacts involving the exposure of people or the environment to hazards and hazardous materials. Any such impacts are classified as long-term impacts as they are not of a transient nature. Similarly, no additional short-term Class III impacts would occur as a result of additional development allowed by the GPA.

[4] http://maps.conservation.ca.gov/doggr/index.html#close. Accessed August 25, 2015

Long-term Impacts

Impact 3.7-10 Exposure of Populated Areas to Oil and Gas Pipelines.

The GP/CLUP Final EIR identified less than significant impacts associated with the location of oil and gas pipelines in populated areas because safety factors, practices, and policies are already in place that collectively reduce potentially adverse public safety and environmental impacts to less than significant levels.

There are no oil or gas pipelines located on the project site, however, a Southern California Gas Company gas transmission line is located near the southwest corner of the project site (https:www.socalgas.com/safety/pipeline-maps/santa-barbara). As described by the GP/CLUP Final EIR the location of a gas pipeline near the project site would not result in a significant hazard impact. The GPA would increase the number of residents that may be located on the project site and near the gas pipeline but would not result in changes to Impact 3.7-10 as described in the GP/CLUP Final EIR.

Impact 3.7-11 Ellwood Facility.

The project site is located more than 1.5 miles from the Venoco facilities. Therefore, the GPA would not result in changes to Impact 3.7-11 as described in the GP/CLUP Final EIR.

Impact 3.7-12 EMFs.

There are no high voltage transmission lines on or adjacent to the project site. Therefore, the GPA would not result in changes to Impact 3.7-12 as described in the GP/CLUP Final EIR.

Impact 3.7-13 Upset and Accident Conditions.

The GP/CLUP Final EIR identified less than significant impacts associated with the potential of a release of hazardous materials into the environment through reasonably foreseeable upset and accident conditions at residential or school properties. The residential uses that could be developed on the project site would not be a substantial source of hazardous materials that could potentially be released to the environment, and the additional development allowed by the GPA would not be located near a school that could result in a hazardous material release. Therefore, the additional residences on the project site facilitated by the GPA would incrementally increase Impact 3.7-13 but would not change its classification as a Class III impact (less than significant).

Impact 3.7-14 Contaminated Groundwater.

The GP/CLUP Final EIR identified less than significant impacts associated with exposure of the community to contaminated groundwater associated with a federal National Priorities List hazardous waste site or leaking underground storage tank site.

A Phase 1 Environmental Site Assessment conducted for the project site (Rincon, 2007) included a database search of public lists of sites that generate, store, treat, or dispose of

hazardous materials or sites where a release or incident has occurred. The search included properties within one-quarter of a mile of the project site. The data base search identified nine sites, however, only one of those sites was listed in a database indicative of a hazardous materials release. That site was the 7-Eleven Store west of the project site, and it was listed as a leaking underground storage tank site. A recent query of the State Water Resources Control Board Geotracker[5] website indicated that the 7-Eleven case involved only soil contamination and that the case was closed by the Santa Barbara County Fire Protection District, Fire Prevention Division in February, 2013. No other active contamination remediation cases were identified in the vicinity of the project site. Therefore, the GPA would not increase Impact 3.7-14 and would not change its classification as a Class III impact (less than significant).

Class IV Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify Class IV impacts (beneficial impacts) related to hazards and hazardous materials. Buildout of the GP/CLUP is not expected to reduce any exposure to public safety hazards or exposure of people to hazardous materials. Similarly, no additional Class IV impacts would occur with the GPA.

4.7.5 Cumulative Impacts

The GP/CLUP Final EIR found that the implementation of the GP/CLUP would increase the number of persons potentially exposed to hazards and hazardous materials. Developing Emergency Preparedness Programs and implementing GP/CLUP policies, however, would provide adequate safety protection for the public and the environment. The GP/CLUP Final EIR also noted that risks resulting from exposure of people and the environment to hazards and hazardous materials are usually site-specific and generally do not combine with similar effects that could occur with other projects throughout the cumulative study area. Therefore, any cumulative impacts resulting from such exposures are less than significant. However, the GPA would result in a city-wide increase in the number of residents that could potentially be affected by an accidental release of hazardous materials in the unlikely event of a major transportation accident along U.S. 101 or the UPRR tracks, which would be a Class I cumulative impact. The increase in potential future resident exposure to a transportation-related exposure of hazardous materials resulting from development of the project site under the GPA cannot be reduced to less than significant. This is a new Class I impact not identified in the GP/CLUP Final EIR.

4.7.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation is identified.

Residual Impacts. No changes to Impacts 3.7-1 and 3.7-2 would result with the GPA, and those impacts would remain significant and unavoidable (Class I). As described above,

[5] http://geotracker.waterboards.ca.gov. Accessed August 12, 2015

following implementation of the GP/CLUP policies applicable to Impacts 3.7-3 through 3.7-14, the incremental increases to those impacts resulting from the GPA would be reduced to less than significant levels (Class II or Class III). Cumulative impacts of the GPA related to the transportation of hazardous materials would be a new significant impact that cannot be reduced to a less than significant level.

4.7.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its hazards and hazardous material impacts are identified below.

SE 1.9 Reduction of Radon Hazards. [GP]

Policy SE 7: Urban and Wildland Fire Hazards [GP/CP]

SE 7.1 Fire Prevention and Response Measures for New Development. [GP/CP]

SE 7.2 Review of New Development. [GP/CP]

SE 7.3 Identification of Fire Hazard Areas. [GP/CP]

SE 7.5 Automatic Fire Sprinkler Systems. [GP]

4.8 LAND USE AND RECREATION

Section 3.10 of the GP/CLUP Final EIR describes the following within the City boundary:

- Environmental setting (existing conditions and regulatory setting) for land use and recreation relating to buildout of the GP/CLUP.
- Impacts associated with land use and recreation that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

4.8.1 Physical Setting

The existing conditions description in Section 3.10.1 of the GP/CLUP Final EIR is incorporated by reference into this SEIR, including land use, built environment, and recreation and open space.

The project site is located north of and adjacent to Calle Real in western portion of the City of Goleta. Residential uses border the site to the north, east and west, and U.S. 101 and UPRR tracks are near the site to the south.

4.8.2 Regulatory Setting

The description of the regulatory framework in Section 3.10.2 of the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the descriptions of federal, state, and local regulations.

Since adoption of the GP/CLUP, the City, County, and the University of California, Santa Barbara (UCSB) entered into a Mitigation Implementation and Settlement Agreement. The Agreement outlines measures to be implemented by UCSB to reduce impacts related to housing, traffic, and other public services that could result from the implementation of the UCSB 2010 Long Range Development Plan.

To ensure that UCSB provides an adequate amount of housing for new enrollment occurring with implementation of the 2010 LRDP, UCSB must contribute to a Housing Impact Fund for each new student bed not located on UCSB land to address property tax revenue loss to the City or County that will be used to support public services serving the off-campus population. In addition, UCSB will pay traffic mitigation fees based on specified traffic volume monitoring criteria.

4.8.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta Environmental Thresholds and Guidelines Manual

The City's adopted Thresholds Manual does not provide environmental thresholds specific to land use and recreation. The Thresholds Manual does, however, state that "quality of life" should be considered when evaluating land uses proposed by a given project. Quality of life can be broadly defined as the aggregate effect of all impacts on individuals, families, communities, and other social groupings and on the ways those groups function. Where a substantial physical impact to the quality of the human environment is demonstrated, the project's effect on quality of life shall be considered significant. Quality of life issues, while difficult to quantify, are often primary concerns to the community affected by a project. Examples of such issues that directly involve land use and planning include the loss of privacy and/or neighborhood incompatibility.

CEQA Thresholds

The City also assesses impacts based on the CEQA Guidelines. As stated by Appendix G of the CEQA Guidelines, the proposed project may have a significant impact on land use and planning if it would result in any of the following:

- Physically divide an established community.
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning regulations) adopted for the purpose of avoiding or mitigating an environmental effect.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

As stated by Appendix G of the CEQA Guidelines, a project may have a significant impact related to recreation if it would result in either of the following:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.8.4 Impact Evaluation

Class I Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR found that implementation of the GP/CLUP would not result in any short- or long-term Class I impacts (significant and unavoidable impacts) related to land use or recreation. Any impacts related to Land Use and Recreation resulting from buildout of the GP/CLUP are categorized as Class II or Class III, as described below. No additional Class I impacts would result with the GPA. Any incremental increases in impacts resulting from development allowed by the GPA would still be Class II or Class III.

Class II Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class II impacts (significant impacts reduced to less than significant with mitigation) related to land use and recreation.

Short-term Impacts

Impact 3.10-1 Conflict with Applicable Land Use Policies and/or Regulations Due To Buildout (Construction) of GP/CLUP Land Uses, Transportation Improvements, and Public Facilities.

The GP/CLUP Final EIR identified significant impacts associated with construction-related activities that have the potential to result in temporary impacts due to conflicts with applicable land use policies and/or regulations. The additional development allowed by the GPA also has the potential to result in conflicts resulting from construction-related activities, such as increased fugitive dust, and short-term noise increases and water quality impacts. GP/CLUP policies such as those related to protection of natural resources, air quality, and short-term noise impacts would reduce impacts associated with the GPA to less than significant levels. Therefore, the GPA would incrementally increase Impact 3.10-1 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.10-2 Adverse Physical Effect on the Environment Due to Construction of Planned Recreational Facilities.

The project site is not near planned recreational facilities identified in the GP/CLUP Final EIR. Therefore, the GPA would not result in changes to Impact 3.10-2 as described in the GP/CLUP Final EIR.

Long-term Impacts

Impact 3.10-3 Conflict with Other Applicable Land Use Policies and/or Regulations Due to Buildout of GP/CLUP Land Uses, Transportation Improvements, and Public Facilities.

The City of Goleta Planning Area includes lands within the jurisdiction of the City of Santa Barbara (Santa Barbara Municipal Airport); lands within the UCSB campus subject to the jurisdiction of the University of California Board of Regents; the California Coastal Commission, and a variety of special districts (Goleta Water District, Goleta Sanitary District, Goleta West Sanitary District, Embarcadero Community Services District, Isla Vista Recreation and Park District, Santa Barbara County Fire Protection District, Santa Barbara County Flood Control District, Metropolitan Transit District, and others). In addition to local agency jurisdictional requirements, certain activities conducted within the City are subject to state and federal agency regulations.

Buildout of adopted GP/CLUP land uses have potential to conflict with the applicable environmental impact mitigation policies and/or regulations of the other agencies that maintain full or partial jurisdictions within the City planning area. The GP/CLUP includes policies related

to land use within and near the city, housing, hazards, and agency coordination that consider the requirements of the various jurisdictional agencies. The GP/CLUP Final EIR found that the requirements of these policies would reduce this potential impact to a less than significant level.

The additional development allowed by the GPA has the potential to result in conflicts with such land use policies and/or regulations. The policies included in the GP/CLUP would also reduce the similar impacts of the GPA to less than significant levels. Therefore, the GPA would incrementally increase Impact 3.10-3 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.10-4 Conflict with Any Applicable Habitat Conservation Plan or Natural Community Conservation Plan Due to Buildout of GP/CLUP Land Uses.

The GP/CLUP Final EIR identified significant impacts associated with activities that are inconsistent with approved conservation plans and local conservation policies. Development of the project site would also have the potential to result in this impact because it is adjacent to ESHA identified in the GP/CLUP Final EIR (El Encanto Creek).

The GP/CLUP Final EIR identified policies that would reduce Impact 3.10-4 to a less than significant level. The identified policies include those related to new development and residential land uses. Similarly, these policies would also reduce impacts associated with the GPA to less than significant levels. Therefore, the GPA would increase Impact 3.10-4 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.10-5 Loss of Privacy and/or Neighborhood Incompatibility Due to Buildout of GP/CLUP Land Uses.

The GP/CLUP Final EIR identified significant impacts associated with the loss of privacy or the creation of other conditions incompatible with existing neighborhoods. Development of the project site consistent with the proposed GPA would also have the potential to result in this impact because it is adjacent to existing neighborhoods. Although the development of residential uses on the project site could result in compatibility impacts, this would not be a new impact associated with the project site as the use of the site for agricultural production would also have the potential to result in conflicts associated with agricultural production, such as noise, odors, spraying and dust.

The GP/CLUP Final EIR identified policies that would reduce Impact 3.10-5 to a less than significant level. The identified policies include those related to residential development standards, densities, community, and residential character, design review, and others. These policies would also reduce impacts associated with the GPA to less than significant levels. Therefore, the GPA would increase Impact 3.10-5 but would not change its classification as a Class II impact (less than significant with mitigation).

Impact 3.10-6 Adverse Physical Effect on the Environment Due to Buildout of Planned Recreational Facilities.

The GP/CLUP Final EIR identified significant impacts associated with physical effects on the environment due to buildout of planned recreational facilities. Development of the project site as facilitated by the GPA would not have the potential to result in an increase of this impact because the project site does not include and is not adjacent to any of the planned recreation facilities identified by the GP/CLUP. Therefore, the GPA would not result in changes to Impact 3.10-6 as described in the GP/CLUP Final EIR.

Impact 3.10-7 S*ubstantial Physical Deterioration or Accelerated Deterioration of Existing Recreational Facilities Due to Buildout of GP/CLUP Land Uses.*

The GP/CLUP Final EIR identified significant impacts associated with increased use of existing recreation facilities due to the additional development/population. Development of the project site as proposed by the GPA would have the potential to increase this impact due to additional population on the project site.

The GP/CLUP Final EIR identified policies that would reduce Impact 3.10-7 to a less than significant level. The identified policies include those related to residential development standards, neighborhood open space, financing public parks and open space, and others. These policies would also reduce impacts associated with the GPA to less than significant levels. Therefore, the GPA would incrementally increase Impact 3.10-7 but would not change its classification as a Class II impact (less than significant with mitigation).

Class III Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts.

The GP/CLUP Final EIR did not identify short-term Class III impacts (less than significant impacts) related to land use or recreation. Any short-term impacts related to land use or recreation are classified as Class II, as described above. The incremental increases in short-term impacts resulting from additional development allowed by the GPA would also be classified as Class II. No additional short-term Class III impacts would occur with the GPA.

Long-term Impacts

Impact 3.10-8 Physical Division of an Established Community Due to Buildout of GP/CLUP Land Uses.

Buildout of the GP/CLUP would generally result in more efficient growth and development, with vacant sites having land use designations similar to existing land uses surrounding those sites. Transportation improvements identified in the GP/CLUP would not result in the physical division of an established community. The GP/CLUP Final EIR identified impacts associated with division of established communities by projects and transportation improvements as less than significant.

Development of the project site would occur on a vacant property that is surrounded by residential uses. No new roads or right-of-ways that would physically divide an established community would be required to serve development on the project site. In addition, development on the project site has the potential to result in the development of trails available for use by the public that could improve connections to nearby residential neighborhoods, public transportation, and commercial uses along Calle Real. Therefore, the GPA would not result in any change to Impact 3.10-8.

Class IV Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify Class IV impacts (beneficial impacts) related to land use and recreation. Increased development resulting from buildout of the GP/CLUP is not expected to result in any beneficial impacts on land use and planning or recreation. Similarly, no additional Class IV impacts would occur with the additional development allowed by the GPA.

4.8.5 Cumulative Impacts

The GP/CLUP Final EIR anticipated that development of the identified related projects and general regional growth would be reviewed for consistency with adopted and applicable land use plans and policies, in accordance with the requirements of CEQA, the Planning and Zoning Law (Government Code §§ 65000, *et seq*.), and the Subdivision Map Act (Government Code §§ 66410, *et seq*.), all of which require findings of general plan and policy consistency before the City can consider approving discretionary development entitlements. For this reason, the GP/CLU Final EIR deemed cumulative impacts associated with inconsistency of future development with adopted plans and policies to be less than significant.

Development that could result from the GPA would also be subject to these consistency reviews. Therefore, the GPA would result in an incremental contribution to these cumulative impacts, but would not change their classification as less than significant.

The GP/CLUP Final EIR also identified a less than significant contribution to cumulative impacts related to recreational facilities due to planned recreation, policies supporting maintenance of existing facilities in the GP/CLUP, and the requirement for in-lieu fees for parks or donation of parkland pursuant to the Quimby Act (Government Code § 66477) required for individual projects. The incremental increase in population due to development associated with the GPA would not result in significant cumulative impacts to recreational facilities for the same reasons.

4.8.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation is required.

Residual Impacts. The GP/CLUP Final EIR concluded that implementation of the GP/CLUP land use policies would reduce all significant Class II land use impacts to a less than

significant level. As noted above, the incremental increases in these impacts that may result from the proposed GPA would also be reduced to a less than significant level with implementation of the same GP/CLUP land use policies.

4.8.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its land use and recreation impacts are identified below.

Policy LU 1: Land Use Plan Map and General Policies

LU 1.2 Residential Character. [GP/CP]

LU 1.7 New Development and Protection of Environmental Resources. [GP/CP]

LU 1.8 New Development and Neighborhood Compatibility. [GP/CP]

LU 1.9 Quality Design in the Built Environment. [GP/CP]

LU 1.13 Adequate Infrastructure and Services. [GP/CP]

Policy LU 2: Residential Land Uses [GP/CP]

LU 2.1 Residential Land Use Categories. [GP/CP]

LU 2.2 Residential Use Densities. [GP/CP]

LU 2.3 Residential Development Standards. [GP/CP]

LU 2.4 Single-Family Residential Use Category (R-SF). [GP/CP]

Policy LU 11: Growth Management [GP]

LU 11.1 Pacing of Growth. [GP]

Policy OS 6: Public Park System Plan [GP]

OS 6.5 Neighborhood Open Space. [GP]

Policy OS 7: Adoption of Open Space Plan Map [GP]

OS 7.4 Open Space for Managed Production of Resources. [GP]

Policy CE 14: Preservation and Enhancement of Urban Forest [GP]

CE 14.1 Definition of Urban Forest. [GP]

CE 14.2 Public Urban Forest Management. [GP]

CE 14.3 Tree Species List. [GP]

CE 14.4 Conservation of Trees on Public Property. [GP]

4.9 NOISE

Section 3.11 of the GP/CLUP Final EIR describes the following within the City boundary:

- Environmental setting (existing conditions and regulatory setting) for noise relating to the proposed project.
- The impacts associated with noise that would result from the proposed project.
- Mitigation measures that would reduce these impacts.

4.9.1 Physical Setting

The existing conditions description in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including noise sensitive land uses, noise fundamentals and terminology, and existing noise levels.

The project site is vacant and not a substantial source of noise. Noise sources in the project area include vehicle traffic on Calle Real and U.S. 101, and the Union Pacific Railroad (UPRR) tracks. Continuous sound level measurements were conducted at a location near the southeast corner of the project site from Friday through Saturday, September 4-5, 2009. Peak measured noise levels at the project site of up to 94 dBA occurred when trains passed by. The Ldn noise level at the southern perimeter of the project site was calculated to be 75 dBA. The calculated 65 dBA Ldn noise contour is located near the center of the project site. Sensitive noise receptors near the project site include residences to the north, east and west.

4.9.2 Regulatory Setting

The description of the regulatory framework in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the discussions of federal, state, and local regulations.

4.9.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta Environmental Thresholds and Guidelines Manual

Appendix G of the CEQA Guidelines provides guidance that lead agencies can use to develop specific CEQA significance thresholds. Section 12 of the Thresholds Manual, Noise Thresholds, provides guidance for assessing the significance of noise impacts associated with a proposed project.

The following are thresholds of significance that may be used to evaluate the significance of noise impacts. The thresholds are intended to be used with flexibility, as each project must be viewed in its specific circumstances.

a. A proposed development that would generate noise levels in excess of 65 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL) and could affect sensitive receptors would generally be presumed to have a significant impact.

b. Outdoor living areas of noise sensitive uses that are subject to noise levels in excess of 65 dBA CNEL would generally be presumed to be significantly impacted by ambient noise. A significant impact would also generally occur where interior noise levels cannot be reduced to 45 dBA CNEL or less.

c. A project would generally have a significant effect on the environment if it would increase substantially the ambient noise levels for noise sensitive receptors adjoining areas. Per item a., this may generally be presumed when ambient noise levels affecting sensitive receptors are increased to 65 dBA CNEL or more. However, a significant effect may also occur when ambient noise levels affecting sensitive receptors increase substantially but remain less than 65 dBA CNEL, as determined on a case-by-case level.

d. Noise from grading and construction activity proposed within 1,600 feet of sensitive receptors, including schools, residential development, commercial lodging facilities, hospitals or care facilities, would generally result in a potentially significant impact. According to the USEPA guidelines, the average construction noise is 95 dBA at a 50-foot distance from the source. A 6 dB drop occurs with a doubling of the distance from the source. Therefore, locations within 1,600 feet of the construction site would be affected by noise levels over 65 dBA. Construction within 1,600 feet of sensitive receptors on weekdays outside of the hours of 8 a.m. to 5 p.m. and on weekends would generally be presumed to have a significant effect. Noise attenuation barriers and muffling of grading equipment may also be required. Construction equipment generating noise levels above 95 dBA may require additional mitigation.

CEQA Thresholds

Appendix G of the CEQA Guidelines provides guidelines for assessing the significance of noise impacts under CEQA. The CEQA Guidelines indicate that a significant noise impact can occur if a project would result in any of the following:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

- Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels.

- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

- For a project is located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would expose people residing or working in the project area to excessive noise levels.

- For a project within the vicinity of a private airstrip, would expose people residing or working in the project area to excessive noise levels.

4.9.4 Impact Evaluation

Class I Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class I impacts (significant and unavoidable impacts) related to noise.

Short-term Impacts

Impact 3.11-1 Exposure of Noise Sensitive Land Uses to Noise from Single-Event and Nuisance Noise Sources.

The GP/CLUP Final EIR identified significant and unavoidable impacts associated with exposure of noise-sensitive land uses to single-event and nuisance noise levels from construction. Development that would be facilitated by the GPA would also result in short-term construction noise impacts to noise-sensitive residences located north, east and west of the project site.

The GP/CLUP Final EIR identified noise policies related to noise and land use compatibility standards. Implementation of those policies would place specific limits on noise from construction activities. Although the policies would reduce construction-related noise impacts resulting from buildout of the GP/CLUP, they would not reduce impacts to a less than significant level in all cases, such as during certain building activities that are critical to construction that may temporarily exceed acceptable short-term noise levels set by City policies or regulations. Similarly, the policies would also reduce impacts associated with the GPA, but may not reduce them to a less than significant level. Therefore, the GPA would incrementally increase Impact 3.11-1, but would not change the level of impacts and impacts would remain significant and unavoidable.

Long-term Impacts

Impact 3.11-2 Exposure of Existing or Planned Noise Sensitive Receptors Uses to Increased Noise.

The GP/CLUP Final EIR identified significant and unavoidable impacts associated with noise levels at sensitive receptors from increased vehicle traffic, and in some cases noise levels would exceed 65 dBA CNEL. The project site is near U.S. 101 and GP/CLUP Final EIR Figure 3.11-3 shows that much of the project site is within the 65 dBA roadway noise contour for 2030 GP/CLUP buildout conditions.

The GP/CLUP Final EIR identified noise policies related to traffic noise sources, project design criteria to attenuate noise, and land use compatibility standards that would reduce traffic noise impacts. Although the policies would reduce traffic noise impacts resulting from buildout of the GP/CLUP, they would not reduce impacts to a less-than-significant level in all cases. The policies would also reduce impacts associated with the GPA, but may not reduce them to a less-than-significant level. Therefore, the GPA would incrementally increase Impact 3.11-2 by exposing additional people to potentially significant traffic noise impacts, however, the GPA would not change the level of impacts and impacts would remain significant and unavoidable.

Impact 3.11-3 Exposure of Proposed Noise Sensitive Land Uses to Traffic Noise.

The GP/CLUP Final EIR identified significant and unavoidable impacts associated with noise levels at sensitive receptors from increased vehicle traffic, and in some cases noise levels would exceed 65 dBA CNEL. The project site is near U.S. 101 and GP/CLUP Final EIR Figure 3.11-3 shows that much of the project site is within the 65 dBA roadway noise contour for 2030 GP/CLUP buildout conditions.

The GP/CLUP Final EIR identified noise policies related to traffic noise sources, project design criteria to attenuate noise, and land use compatibility standards that would reduce traffic noise impacts. Although the policies would reduce traffic noise impacts resulting from buildout of the GP/CLUP, they would not reduce impacts to a less-than-significant level in all cases. The policies would also reduce impacts associated with the GPA, but may not reduce them to a less-than-significant level. Therefore, the GPA would incrementally increase Impact 3.11-3 by exposing additional people to potentially significant traffic noise impacts, however, the GPA would not change the level of impacts and impacts would remain significant and unavoidable.

Impact 3.11-4 Exposure of Proposed Noise Sensitive Land Uses to Railway Noise.

The GP/CLUP Final EIR identified significant and unavoidable impacts associated with noise levels at sensitive receptors from train operations, and in some cases noise levels would exceed 65 dBA CNEL. The project site is near the UPRR tracks and GP/CLUP Final EIR Figure 3.11-4 shows that the southern perimeter of the project is within the 65 dBA noise contour for train operations in 2030.

The GP/CLUP Final EIR identified applicable noise policies that would minimize train-related noise impacts, including project design criteria to attenuate noise, and land use compatibility standards. Although the policies would reduce train noise impacts resulting from buildout of the GP/CLUP, they would not reduce impacts to a less-than-significant level in all cases. The policies would also reduce impacts associated with the GPA, but may not reduce them to a less-than-significant level. Therefore, the GPA would incrementally increase Impact 3.11-4 by exposing additional people to potentially significant train noise impacts, however, the GPA would not change the level of impacts and impacts would remain significant and unavoidable.

Impact 3.11-5 Exposure of Noise Sensitive Land Uses to Industrial and Other Point Sources.

The GP/CLUP Final EIR identified significant and unavoidable impacts associated with noise that may be generated by commercial and industrial operations. Land uses adjacent to the project site are residential uses that are not a substantial source of noise. Therefore, the GPA would not result in changes to Impact 3.11-5 as described in the GP/CLUP Final EIR.

Class II Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify any Class II impacts (significant impacts reduced to less than significant with mitigation) related to noise. Impacts related to noise identified by the GP/CLUP Final EIR are classified as Class I (described above) or Class III (described below). No additional short-term Class II impacts would result from the proposed the GPA.

Class III Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

The GP/CLUP Final EIR did not identify any short-term Class III impacts (less than significant impacts) related to noise. No additional short-term Class III impacts would result from the proposed the GPA.

Long-term Impacts

The GP/CLUP Final EIR identified the following long-term Class III impact related to noise.

Impact 3.11-6 Exposure of Proposed Noise Sensitive Land Uses to Airport Noise.

The project site is approximately 4,000 feet northwest of the 65 dBA noise contour that results from existing (2003) aircraft operations at the Santa Barbara Municipal Airport. The project site Village property is not affected by high aircraft noise levels. Therefore, the GPA would not result in changes to Impact 3.11-6 as described in the GP/CLUP Final EIR.

Class IV Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify Class IV impacts (beneficial impacts) related to noise. Development resulting from buildout of the GPA would not cause any beneficial reduction in sources of noise within the City. Similarly, no additional Class IV impacts would occur with the additional development allowed by the GPA.

4.9.5 Cumulative Impacts

Impact 3.11-7 Cumulative Traffic Noise.

The GP/CLUP Final EIR identified a significant and unavoidable cumulative traffic noise impact to noise-sensitive land uses located along the following roadways in the City:

- Cathedral Oaks Road east of Patterson Avenue
- Cathedral Oaks Road east of Ribera Avenue
- Fairview Avenue north of Hollister Avenue
- Hollister Avenue west of Pacific Oaks Drive
- Storke Road north of Marketplace Drive
- Storke Road north of Phelps Road

Traffic generated by development facilitated by the GPA would likely contribute to cumulative traffic noise condition on Storke Road north of Marketplace Drive and north of Phelps Road. Therefore, the GPA would contribute to the significant and unavoidable cumulative traffic noise impacts identified by the GP/CLUP Final EIR.

4.9.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation measures are required.

Residual Impacts. Implementation of the GPA would increase noise impacts over what was identified in the GP/CLUP Final EIR, including impacts related to the exposure of noise-sensitive land uses to construction noise, and the exposure of additional population to traffic and train noise. These impacts would remain significant and unavoidable (Class I).

4.9.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its noise impacts are identified below.

Policy NE 1: Noise and Land Use Compatibility Standards [GP]

NE 1.1 Land Use Compatibility Standards. [GP]

NE 1.2 Location of New Residential Development. [GP]

NE 1.3 Noise Buffers. [GP]

NE 1.4 Acoustical Studies. [GP]

NE 1.5 Acceptable Noise Levels. [GP]

Policy NE 2: Traffic Noise Sources [GP]

NE 2.7 Traffic-Calming Measures. [GP]

NE 2.8 Maintenance of Paved Roadways. [GP]

Policy NE 6: Single-Event and Nuisance Noise [GP]

NE 6.4 Restrictions on Construction Hours. [GP]

NE 6.5 Other Measures to Reduce Construction Noise. [GP]

Policy NE 7: Design Criteria to Attenuate Noise [GP]

NE 7.1 Control of Noise. [GP]

NE 7.2 Site-Design Techniques. [GP]

NE 7.3 Architectural Techniques. [GP]

NE 7.5 Implementation of Recommendations from Acoustical Analyses. [GP]

NE 7.7 Acoustic Design Manual Requirements. [GP]

4.10 POPULATION AND HOUSING

Section 3.8 of the GP/CLUP Final EIR describes the following within the existing City boundary:

- Environmental setting (existing conditions and regulatory setting) for population and housing relating to buildout of the GP/CLUP.
- Population and housing impacts associated with implementation of buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

4.10.1 Physical Setting

Population

The population conditions description in the GP/CLUP Final EIR is incorporated by reference into this SEIR and updated as follows.

The January 2015 population of the City of Goleta was 30,765 (California Department of Finance, 2015). The Santa Barbara County Association of Governments' (SBCAG's) *Regional Growth Forecast 2010-2040 Report* includes the population projections for the City and the County as shown on Table 4.10-1.

Table 4.10-1
SBCAG Population Projections

Jurisdiction	2010	2015	2020	2025	2030	2035	2040
City of Goleta	28,888	30,000	*	*	*	33,900	34,600
County Total	423,800	428,600	445,900	470,400	495,000	507,500	522,000

Source: SBCAG 2012
* The SBCAG's Regional Growth Forecast did not provide specific data for these years.

Household and Family Size

The City had 10,903 households as reported in the 2010 Census. In 2010, family households comprised approximately 62 percent of all households in the City, slightly less than the 65 percent for the County as a whole. The estimated average household size for the City is 2.76 (California Department of Finance, 2015), and the average family size was 3.23 (U.S. Census Bureau 2013a). The 2009 to 2013 median annual household income within the current City limits was $73,691, compared to the County median of $62,779 and state median of $61,094 (City of Goleta, 2015).

Employment

The employment conditions description in the GP/CLUP Final EIR is incorporated by reference into this SEIR and updated as follows.

The civilian workforce over 16 years old during 2009 to 2013 was 68.9 percent of the population in Goleta. From 2011 to 2013, by industry, educational services/health care/social assistance was the largest industry type, with 29.9 percent of the civilian employed population over 16 years old. Retail and professional, scientific management administration, and waste management services were about 10.8 percent, followed by manufacturing at 10.3 percent (City of Goleta, 2015).

Jobs-Housing Ratio and Jobs-Employed Residents Ratio

The jobs-housing ratio and jobs-employed residents ratio descriptions in the GP/CLUP Final EIR are incorporated by reference into this SEIR and updated as follows.

Table 4.10-2
US Census Estimated Daytime Population and Employment-Residence Ratios (2006–2010)

Place Name	Total Resident Population	Total Workers Working in Place	Total Workers Living in Place	Employment – Residence Ratio
City of Goleta	29,888	21,764	14,932	1.46
Isla Vista Census Designated Place	23,096	3,903	9,978	0.39
City of Santa Barbara	88,410	66,437	44,778	1.48
City of Santa Maria	99,553	42,182	39,178	1.08
City of Carpinteria	13,040	6,318	6,737	0.94
City of Lompoc	42,434	10,806	16,774	0.65
Santa Barbara County	423,895	201,240	189,106	1.06

Source: City of Goleta, 2015

Housing Characteristics

The housing characteristics description in the GP/CLUP Final EIR is incorporated by reference into this SEIR and updated as follows.

As of January 2015, there were an estimated 11,640 housing units in the City, which was 7.5% of the County's housing units at that time (California Department of Finance 2015). Comparisons of housing units, vacancy rates, and persons per household for January 2011 are shown in Table 4.10-3.

Table 4.10-3
2011 Housing Estimates

	Santa Barbara County Total	Percent of County	City of Goleta	Percent of City
Housing Units	155,353	100%	11,640	100%
Single Family Detached Units	91,086	58.6%	5,416	46.5%
Single Family Attached Units	10,348	6.7%	991	8.5%
Multiple Family (2–4 Units)	15,023	9.7%	1,052	9.0%
Multiple Family (5+ Units)	30,911	19.9%	3,560	30.6%
Mobile Homes	7,985	5.1%	621	5.3%
				Difference with County
Percent Vacant	7.1%		5.0%	-2.1%
Persons per Household	2.9		2.7	-0.2

Source: City of Goleta, 2015

Housing Affordability and Costs

According to the U.S. Census American Community Survey, 55.3 percent of housing in the City is owner occupied. The median sales price for homes in the City for March through June 2015 was $710,000, which represents an increase of 18.5 percent compared to the prior quarter and an increase of 5.2 percent compared to the prior year. Sales prices have appreciated 23.5 percent over the last 5 years in Goleta (City of Goleta, 2015).

Regional Housing Needs and Available Land

The regional housing needs and available land description in Section 3.8.1 of the GP/CLUP Final EIR is updated as follows:

Since the GP/CLUP Final EIR, SBCAG updated the Regional Housing Need Allocation (RHNA) (SBCAG 2013). The City was allocated a total of 979 units for the 2015 to 2023 planning period as shown in Table 4.10-4.

Table 4.10-4
Regional Housing Need Allocation (RHNA) for Goleta (2015–2023)

Income Level	Number of Units	Percent of Housing Units
Very Low Income	235	24.0%
Low Income	157	16.0%
Moderate Income	174	17.8%
Above Moderate Income	413	42.2%
Total	979	100%
Total low and Very low Income (defined as total “lower income units)	392	40%

Source: City of Goleta, 2015

California law requires the City’s General Plan Housing Element include an inventory of vacant or underutilized sites with the potential for residential development during the planning

period. The 5th cycle RHNA projection period began January 1, 2014; units completed after that date are credited toward the City's RHNA allocation. Table 4.10-5 shows the City's remaining need.

Table 4.10-5
Summary of Remaining Regional Housing Needs 2015–2023

Category	Extremely Low Income	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA	118	117	157	174	413	979
Units Completed after 1/1/14 or approved but unbuilt as of 8/18/14	--	5	5	10	458	478
Remaining Need	118	112	152	164	--	546

Source: City of Goleta, 2015

Housing Development Potential in Goleta

The housing development potential description in the GP/CLUP Final EIR is incorporated by reference into this SEIR. No update is needed.

4.10.2 Regulatory Setting

The description of the regulatory framework in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the descriptions of federal, state, and local regulations.

Since adoption of the GP/CLUP, the City, County, and the University of California, Santa Barbara (UCSB) entered into a Mitigation Implementation and Settlement Agreement. The Agreement outlines measures to be implemented by UCSB to reduce impacts related to housing, traffic, and other public services that could result from the implementation of the UCSB 2010 Long Range Development Plan.

To ensure that UCSB provides an adequate amount of housing for new enrollment occurring with implementation of the 2010 LRDP, UCSB must contribute to a Housing Impact Fund for each new student bed not located on UCSB land to address property tax revenue loss to the City or County that will be used to support public services serving the off-campus population. In addition, UCSB will pay traffic mitigation fees based on specified traffic volume monitoring criteria.

4.10.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta Environmental Thresholds and Guidelines Manual

The City's Thresholds Manual does not contain significance thresholds for population and housing.

CEQA Thresholds

Appendix G of the CEQA Guidelines states that a project may have a significant effect on the environment if it would result in any of the following:

- Induce "substantial" population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

4.10.4 Impact Evaluation

Table 4.10-6 summarizes the changes in population, jobs, and the jobs-to-housing ratio as a result of build-out of the GP/CLUP, as identified in the GP/CLUP Final EIR, and the additional impacts resulting from the GPA.

Table 4.10-6
City of Goleta General Plan/Coastal Land Use Plan
Potential Buildout and GPA Additional Buildout

	GP/CLUP EIR Total Estimated Buildout Through 2030	GPA Change/Additional Buildout	GP/CLUP + GPA Total
Population	38,100	77	38,177
Jobs	28,690 to 29,190	Negligible change (excludes temporary construction jobs)	28,690 to 29,190
Total Residential Units	14,877	28	14,905
Jobs to Housing Ratio	1.92 to 1.96	Negligible change in ratio(negligible change in jobs)	1.92 to 1.96

Residential unit density on a project site in the City is calculated based on the gross acreage of the site less any on-site area that has environmental constraints. The existing land use designations of the main (9.39-acre) portion of the project site are Single Family Residential

(maximum of five units per acre) on the northern portion of the site, and Agriculture on the southern portion. The northern residentially-zoned portion of the site has a "net" developable area of approximately 5.6 acres that excludes riparian ESHA associated with El Encanto Creek. The eastern "arm" parcel that is part of the project site is 0.17 acres and has a land use designation of Single Family Residential (maximum of 5 units per acre); and the western arm parcel is 0.53 acres and has a land use designation of Planned Residential (8 units per acre). Overall the "net" area of the project site that currently has a residential land use designation is approximately 6.3 acres. Using a development density of five units per acre, the northern portion of the project site could support the development of approximately 31 residential units (6.3 acres x 5 units per acre); and one residential unit could be developed on the southern portion of the site, for a total of 32 units. The proposed GPA includes a request to change the land use designations of the entire approximately 10-acre project site to Planned Residential 6.2 units per acre, which would facilitate the development of 60 residential units, an increase of 28 units when compared to the maximum amount of development that could occur under the site's existing land use designations.

With an average household size in the City of 2.76 persons, the GPA would result in a net increase in population on the Project site of approximately 77 people (28 additional units x 2.76 people/unit). This would be an increase of approximately 0.2 percent over the population projected at buildout of the GP/CLUP.

Class I Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR found that implementation of the GP/CLUP would not result in any short- or long-term Class I impacts (significant and unavoidable impacts) related to population and housing. Any impacts related to population and housing are classified as Class II or Class III (as discussed below). The incremental increases in these impacts due to additional development allowed by the GPA would not change their classification as Class II or Class III. No additional Class I impacts would occur with the GPA.

Class II Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class II impacts (significant impacts reduced to less than significant with mitigation) related to population and housing.

Short-term Impacts

Impact 3.8-1 *The Result of the Increased Population Would Be the Need for Additional Housing and Jobs, Which Would Result in the Physical Alteration of Vacant and Previously Developed Land within the City.*

The GP/CLUP Final EIR identified significant impacts associated with the secondary or indirect effects of population growth. The GPA would result in additional population growth if the project site were developed in accordance with the assumptions described above. The population growth would be approximately 0.2 percent greater than that evaluated by the GP/CLUP Final EIR, which could contribute to additional secondary or indirect effects.

Resource protection and growth management policies identified by the GP/CLUP Final EIR would reduce indirect impacts of the GPA to less-than-significant levels. Therefore, the GPA would incrementally increase Impact 3.8-1 but would not change its classification as Class II (less than significant with mitigation).

Long-term Impacts

Impact 3.8-2 Population Growth Associated with Implementation of the GP/CLUP Is Anticipated to Result in an Increase in the Population by 24 Percent at Full or Ultimate Buildout.

The GP/CLUP Final EIR identified significant impacts associated with the 24% population growth that would result from full buildout of the GP/CLUP. The population growth itself over the 24 years assumed to GP/CLUP buildout was not considered significant, but the indirect impacts of the population increase would be considered potentially significant. The GPA would add 0.2% to the population increase identified in the GP/CLUP Final EIR, for a 24.2% population growth over 24 years.

The GP/CLUP Final EIR identified policies that would reduce Impact 3.8-2 to a less-than-significant level. Those policies relate to growth management and are anticipated to reduce population growth and housing impacts resulting from both buildout of the GP/CLUP and GPA to a less-than-significant level. No additional mitigation is required. Therefore, the GPA would incrementally increase Impact 3.8-2, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.8-3 Ultimate Buildout of the City in Accordance with the GP/CLUP Could Result in the Addition of 3,880 Residential Units to the City's Housing Stock.

The GP/CLUP Final EIR identified significant impacts due to population growth associated with the addition of 3,880 residential units that could be constructed at full buildout of the GP/CLUP. The GPA could add an additional 28 residential units, for a total of 3,908 units over 24 years.

The GP/CLUP Final EIR identified programs in the City's Housing Element that identify specific numerical targets for units and anticipated dates by which the RHNA targets are proposed to be accomplished. The GP/CLUP Final EIR also identified policies to provide adequate housing stock and meeting the RHNA targets. The GP/CLUP Final EIR found that implementation of these policies would reduce potential impacts related to providing an adequate and serviceable housing stock to a less-than-significant level. No additional mitigation is required.

The identified policies would also reduce impacts associated with the GPA's incremental addition to the City's housing stock to a less-than-significant level. Therefore, the GPA would incrementally increase Impact 3.8-3, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.8-4 Ultimate Buildout of the City in Accordance with the GP/CLUP Would Result in the Addition of Approximately 3,400 to 3,900 Jobs.

The GP/CLUP Final EIR stated that the 3,880 additional housing units resulting from GP/CLUP buildout would help maintain an existing balance between jobs and housing, or between jobs and employed residents, within the City. The GP/CLUP Final EIR also stated that any increase in jobs resulting from the development of additional commercial/industrial space not coordinated with the construction of new residential development within the City could result in an imbalance in the current jobs-to-housing balance and could result in an increase in the net out-commute, thereby potentially increasing the existing traffic volumes on US Highway 101. This imbalance was considered a potentially significant impact.

The GPA would result in up to 28 additional residential units within the City, but would not result in an increase in job-producing commercial or industrial uses. The additional units would improve the City's jobs-to-housing balance, but not to a significant degree. The GP/CLUP Final EIR identified population and housing related policies that would reduce Impact 3.8-4 to a less-than-significant level. Those policies address the jobs-to-housing balance and management of non-residential growth. Therefore, the GPA would not result in any incremental increases to Impact 3.8-4, and would not change its classification as Class II (less than significant with mitigation).

Class III Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

The GP/CLUP Final EIR did not identify short-term Class III impacts (less than significant impacts) related to population and housing. Any short-term impacts related to population and housing are classified as Class II (as discussed above). The incremental increases in these short-term impacts due to additional development allowed by the GPA would not change their classification as Class II. No additional short-term Class III impacts would occur with the GPA.

Long-term Impacts

Impact 3.8-5 The GP/CLUP Would Not Result in the Displacement of a Substantial Number of People or Existing Homes.

The GP/CLUP Final EIR found that the implementation of the GP/CLUP would not result in the displacement of a substantial number of people or existing homes. The GPA would not result in any residential displacement because the project site is vacant. Therefore, no additional significant impacts would occur and no mitigation is necessary.

Class IV Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify short-term Class IV impacts (beneficial impacts) related to population and housing. The anticipated improvement in the City's jobs-to-housing ratio from 2.3:1 to 1:1 at full GP/CLUP buildout was considered a long-term Class IV impact in the GP/CLUP Final EIR. As described above, the GPA would not substantially affect the anticipated jobs-to-housing ratio. Therefore, the GPA would not substantially change the level of this beneficial impact.

4.10.5 Cumulative Impacts

The GP/CLUP stated that cumulative development is anticipated to both accommodate and induce population growth, depending upon the type of development proposed. However, population growth has been forecast by local and regional planning programs, and appropriate plans, policies, and regulations are in place to accommodate this growth. The GP/CLUP was intended to address population and growth issues in Goleta and the region, including a substantial affordable housing shortage in the County. The residential use and associated population increases for the cumulative study area have been projected and considered in regional growth plans. The estimated population increase of 24% over the next 25 years due to GP/CLUP buildout is not considered in and of itself to be a significant impact. Therefore, the contribution of the GP/CLUP to impacts associated with an inducement of substantial population growth in the area, either directly or indirectly, would not be cumulatively considerable and would result in a less than significant impact.

The GPA would result in an additional maximum population increase of 77 persons, or a 0.2% increase over what was projected in the GP/CLUP Final EIR. This incremental increase does not represent a significant change from the population projection at GP/CLUP buildout. Therefore the GPA would not result in a cumulatively considerable contribution to impacts associated with an inducement of substantial population growth in the area. The GPA would not change the classification of these impacts as less than significant.

Other cumulative development projects in the City, such as the proposed Shelby GPA, would increase the population of the City above what was considered by the GP/CLUP Final EIR. The Shelby project would have the potential to increase the buildout population of the City by 195 people (City of Goleta, 2015). While this additional growth could contribute to indirect population-related environmental impacts, the increase is not substantial and growth management plans, policies, and regulations are in place to accommodate this growth. Furthermore, other recently approved projects (Westar, Village at Los Carneros, Cortona Apartments, The Hideaways, etc.) will result in approximately 1,000 fewer residential units and a corresponding reduction in population than what would have resulted if the maximum densities of those projects were developed consistent with what was allowed by the GP/CLUP (City of Goleta, 2015a OTV). Therefore, cumulative increases in dwelling units and population would not be a significant impact.

4.10.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation is required.

Residual Impacts. The GP/CLUP Final EIR found that there would be no residual impacts related to population and housing. Implementation of the GPA would also result in no significant residual impacts related to population and housing.

4.10.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its population and housing impacts are identified below.

Policy HE 2: Facilitate New Housing Development to Meet Growth Needs for Persons of All Income Levels [GP]

HE 2.1 Encourage a Diverse Range of New Housing.

HE 2.5 Inclusionary Housing.

HE 2.7 Encourage Accessory (Second) Residential Units.

4.11 PUBLIC SERVICES AND UTILITIES

Section 3.12 of the GP/CLUP Final EIR describes the following within the City boundary:

- Environmental setting (existing conditions and regulatory setting) for public services and utilities relating to buildout of the GP/CLUP.
- The impacts associated with for public services and utilities that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

4.11.1 Physical Setting

The existing conditions description in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including police protection, fire protection services, water supply, wastewater management services, solid waste, privately provided utilities, public schools, library services, parks and recreation facilities, and public services and utilities.

The project site is vacant and is bordered by residential development to the east, west and north. Water service would be provided by the Goleta Water District and sewer service would be provided by the Goleta West Sanitary District. The project site must be annexed into the Goleta West Sanitary District service area before sewer services can be provided. Other services, such as police and fire protection, and other utilities are also available to serve the project site.

4.11.2 Regulatory Framework

The description of the regulatory framework in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the descriptions of federal, state, and local regulations.

4.11.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta Environmental Thresholds and Guidelines Manual

The City's Thresholds Manual provides specific thresholds for conducting CEQA analysis. Section 15, "School Thresholds," and Section 17, "Solid Waste Thresholds," provide guidance for assessing the significance of project impacts to area schools and the City's solid waste generation based on landfill capacity.

Schools. The project would have a significant impact if it would:

- Generate sufficient students to require an additional classroom (this assumes 29 students per classroom for elementary/junior high and 28 students per classroom for high school, based on the lowest student per classroom loading standards of the State school building program). This threshold is to be applied in those school districts which are currently approaching, at, or exceeding their current capacity.

Solid Waste. The project would have a significant impact if it would:

- Generate five percent or more of the expected average annual increase in waste generation thereby using a significant portion of the remaining landfill capacity (the numerical value associated with this 5 percent is approximately 196 tons per year increase). If a proposed project generates 196 or more tons per year, after receiving a reduction and recycling credit of 50 percent, impacts would be considered significant and unavoidable.

CEQA Thresholds

Appendix G of the CEQA Guidelines identifies the circumstances that can lead to a determination of significant public service impact. Significant impacts would occur with implementation of the GP/CLUP if results included substantial adverse physical impacts associated with the provision of, or need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

- Fire protection
- Police protection
- Schools
- Parks
- Other public facilities

Appendix G of the CEQA Guidelines identifies the following circumstances that can lead to a determination of significant utility and service system impact:

- The project exceeds wastewater treatment requirements of the applicable RWQCB.
- The project requires or results in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- The project results in a determination by the wastewater treatment provider that serves or may serve the project that it does not have adequate capacity to serve the project's projected demand.

- The project is served by a landfill with inadequate capacity to meet the project's solid waste disposal needs.

- The project does not comply with federal, state, and local statues and regulations related to solid waste.

Thresholds and impact analysis related to water supply are provided in Section 4.13, Water Resources, of this SEIR. Thresholds and impact analysis related to public parks and recreation are provided in Section 4.8, Land Use and Recreation.

4.11.4 Impact Evaluation

Class I Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify any short-term or long-term Class I impacts (significant and unavoidable impacts) related to public services and utilities. Any impacts related to public services and utilities are classified as either Class II or Class III, as described below. The incremental increases in these impacts due to additional development allowed by the GPA would not change their classification as Class II or Class III. No additional Class I impacts would result with the GPA.

Class II Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

The GP/CLUP Final EIR did not identify any short-term Class II impacts (significant impacts reduced to less than significant with mitigation) related to public services and utilities. Impacts to the capacity of public services and utilities are not transient in nature and therefore are considered long-term impacts. Similarly, no additional short-term Class II impacts would result with the GPA.

Long-term Impacts

The GP/CLUP Final EIR identified the following long-term Class II impacts (significant impacts reduced to less than significant with mitigation) related to public services and utilities.

Impact 3.12-1 Increased Demand for Police Protection.

The GP/CLUP Final EIR identified significant impacts associated with increased demand for police services in the City due to population growth, creating the need for an additional seven to ten police officers, additional equipment, and capital projects such as additions to existing facilities or new facilities.

The additional development allowed by the GPA would also increase the demand for police services and would incrementally add to this Class II impact identified in the GP/CLUP Final EIR. The GP/CLUP Final EIR identified policies related to coordination of facilities with future development and other general public safety policies that would reduce impacts to police

protection services associated with GP/CLUP buildout to a less-than-significant level. Those policies would also reduce impacts resulting from the GPA to a less-than-significant level. Therefore, the GPA would incrementally increase Impact 3.12-1, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.12-2 Increased Demand for Fire Protection.

The GP/CLUP Final EIR identified significant impacts associated with increased demand for fire protection services in the City due to population growth, creating the need for additional personnel, equipment, and facilities or new facilities. The increased population would exacerbate existing deficiencies in fire protection in the City.

The additional development allowed by the GPA would also increase demand for fire protection services and would incrementally add to this Class II impact identified in the GP/CLUP Final EIR. The GP/CLUP Final EIR identified multiple policies and objectives in the GP/CLUP intended to address fire protection service and to accommodate projected growth, including the addition of a new fire station, which has not yet been constructed. Those policies would also reduce impacts resulting from the GPA to a less than significant level. Therefore, the GPA would incrementally increase Impact 3.12-2, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.12-3 Increased Demand for Wastewater Collection, Treatment, and Disposal.

The GP/CLUP Final EIR identified significant impacts associated with increased demand on the City's wastewater collection and service providers due to population growth. The additional development allowed by the GPA would also increase demand for such wastewater services and would incrementally add to this Class II impact identified in the GP/CLUP Final EIR.

The GP/CLUP Final EIR concluded that growth under the GP/CLUP could create an increase of 0.92 million gallons per day (mgd) to 1.06 mgd in wastewater treatment demand, which would be shared between the Goleta Sanitary District (GSD) and the Goleta West Sanitary District (GWSD). The GWSD has approximately 1.41 mgd of remaining capacity at the GSD treatment plant under the existing maximum permitted daily effluent discharge volume.

Sewer service in the project area is provided by GWSD, and treatment of wastewater collected by GWSD is provided through a contract with GSD. Applying GWSD's wastewater generation rate of 184 gallons/day (gpd) per equivalent residential unit, total wastewater effluent from the 28 additional residences facilitated by the proposed GPA would be 5,152 gpd, or 0.005 mgd. Total waste water generation by the 60 residential units that could be constructed on the project site would be 11,040 gpd or 0.011 mgd. Adding this to the increase identified in the GP/CLUP Final EIR would not cause an exceedance of the available unused capacity in the local wastewater treatment system and would not change the conclusions of the GP/CLUP Final EIR:

> "*…although wastewater services demand would increase as a result of Plan implementation, the existing facilities and service providers have sufficient, currently unused and available treatment capacity to accommodate the increased flows resulting*

from the buildout of the GP/CLUP. Additionally, the GP/CLUP includes several policies and objectives to ensure that appropriate wastewater infrastructure and treatment capacities are available to accommodate projected growth."

The GP/CLUP Final EIR identified policies that would reduce impacts to the City's wastewater treatment facilities and service providers associated with GP/CLUP buildout to a less-than-significant level. These policies relate to coordination with other agencies and future development as it relates to water and sewer facilities. Those policies would also reduce impacts resulting from the GPA to a less-than-significant level. Therefore, the GPA would incrementally increase Impact 3.12-3, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.12-4 Increased Demand for Utility Services.

The GP/CLUP Final EIR identified significant impacts associated with increased demand for utilities such as electricity and natural gas due to population growth. The additional development allowed by the GPA would also increase demand for these utilities and would incrementally add to this Class II impact identified in the GP/CLUP Final EIR.

The GP/CLUP Final EIR identified policies that would reduce impacts related to demand for utilities associated with GP/CLUP buildout to a less-than-significant level. Those policies are related to energy conservation, standards for public facilities and coordination of facilities with future development and other agencies. Those policies would also reduce impacts resulting from the GPA to a less-than-significant level. Therefore, the GPA would incrementally increase Impact 3.12-4, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.12-5 Increased Demand on Local School Districts

The GP/CLUP Final EIR identified significant impacts associated with increased demand on local school districts due to population growth. The additional development allowed by the GPA would also increase demand on local school districts and would incrementally add to this Class II impact identified in the GP/CLUP Final EIR.

The scoping document prepared for the Draft Kenwood Village Project EIR (Goleta, 2012) states that the development of 60 residential units on the project site would result in the generation of 17 school-age children (12 elementary, two junior high, and three high school) and that there is adequate capacity at local schools to accept the additional students. In addition, the GP/CLUP Final EIR Section 3.12.3.3 identified a policy related to school facilities that would reduce impacts related to demand on school districts associated with GP/CLUP buildout to a less-than-significant level. This policy states that the City will ensure that adequate public school services and facility capacities are available to meet the long-term needs of both existing and new development in the city as well as service demands from outside Goleta's boundaries. This policy would also ensure that impacts resulting from the GPA are reduced to a less than significant level. Therefore, the GPA would incrementally increase Impact 3.12-5, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.12-6 Increased Demand on Library Facilities.

The GP/CLUP Final EIR identified significant impacts associated with increased demand on library facilities due to population growth. The additional development allowed by the GPA would also increase demand on library facilities and would incrementally add to this Class II impact identified in the GP/CLUP Final EIR.

The GP/CLUP Final EIR identified policies that would reduce impacts related to demand on library facilities associated with GP/CLUP buildout to a less-than-significant level. Those policies are related to standards for public and other facilities and coordination of facilities with other agencies. Those policies would also reduce impacts resulting from the GPA to a less than significant level. Therefore, the GPA would incrementally increase Impact 3.12-6, but would not change its classification as Class II (less than significant with mitigation).

Class III Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

The GP/CLUP Final EIR did not identify any short-term Class III impacts (less than significant impacts) related to public services and utilities. Impacts to the capacity of public services and utilities are not transient in nature and therefore are considered long-term impacts. Similarly, no additional short-term Class III impacts would result with the GPA.

Long-term Impacts

The GP/CLUP Final EIR identified the following long-term Class III impacts related to public services and utilities.

Impact 3.12-7 Exceedance of Capacity of Landfills to Accommodate Additional Solid Waste Stream.

The GP/CLUP Final EIR identified less than significant impacts associated with increases in solid waste generation due to population growth. Development of the project site as allowed by the GPA would also cause an incremental increase in solid waste generation. The City of Goleta's solid waste generation factor identified in the adopted Environmental Thresholds and Guidelines Manual is 0.95 tons per capita. The population associated with 28 additional residences on the project site would be 77 persons, based on an average of 2.76 persons per household. Therefore, buildout of the project site would result in an increase of approximately 73 additional tons of solid waste. Applying a 50 percent reduction for source reduction, recycling, and composting would result in a solid waste disposal increase of approximately 37 tons.

As specified by the City's Environmental Thresholds and Guidelines Manual, any project that would generate in excess of 196 tons of solid waste/year after a 50 percent credit for waste reduction would be considered to result in a significant solid waste impact. Waste generated by additional residences facilitated by the GPA would fall below this threshold. The GPA would

incrementally increase Impact 3.12-7, however, it would not change its classification as Class III (less than significant) and no mitigation is required.

Class IV Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify Class IV impacts (beneficial impacts) related to public facilities and services. Buildout of the GP/CLUP is not expected to result in additional capacity to public facilities and services that would exceed what would be required to accommodate levels of development projected by the GP/CLUP. Similarly, no additional Class IV impacts would occur with the GPA.

4.11.5 Cumulative Impacts

Police and Fire Protection

The GP/CLUP Final EIR identified less than significant contributions to cumulative impacts for police and fire services due to the requirements of the Goleta Development Impact Fees program for new development. The Police Facility Development Impact Fee is required pursuant to Chapter 16.21 of the Goleta Municipal Code. The Fire Facility Development Impact Fee is required for properties within the City pursuant to County Ordinance No. 4353 (adopted March 23, 1999) as adopted by the City Council by Ordinance Nos. 02-17 (adopted April 22, 2002) and 02-22 (adopted June 17, 2002).

Development resulting from the GPA would also be subject to these fees. Therefore, the GPA's cumulative impacts on police and fire services would not be cumulatively considerable. The GPA would not change the less than significant classification of the cumulative police and fire impacts identified by the GP/CLUP Final EIR.

Solid Waste

The GP/CLUP Final EIR found that there would not be a cumulatively considerable contribution to cumulative impacts on solid waste disposal because there is adequate landfill capacity in the regional landfill to accommodate GP/CLUP buildout. The incremental increase in landfill demand that would result from development associated with the GPA would not cause demand to exceed the landfill capacity. Therefore, the GPA's cumulative impact on solid waste disposal would not be cumulatively considerable. The GPA would not change the less than significant classification of the cumulative solid waste impacts identified by the GP/CLUP Final EIR.

Water Supply

Cumulative water supply impacts are evaluated in Section 4.13, Water Resources.

Wastewater

The GP/CLUP Final EIR found that there would not be a cumulatively considerable contribution to cumulative impacts on wastewater treatment because there is adequate capacity within the existing infrastructure to accommodate GP/CLUP buildout. The incremental increase in wastewater treatment resulting from development associated with the GPA would not exceed the wastewater treatment system capacity. Therefore, the GPA's cumulative impact on wastewater treatment would not be cumulatively considerable. The GPA would not change the less than significant classification of the cumulative wastewater impacts identified by the GP/CLUP Final EIR.

Schools

The GP/CLUP Final EIR found that there would not be a cumulatively considerable contribution to cumulative impacts on schools because new private development would be required to pay impact fees to the corresponding school district to help fund construction of additional facilities. Under California law, payment of these fees is deemed to constitute full mitigation per CEQA (Government Code § 65996(b)). The incremental increase in school population resulting from development associated with the GPA also would be mitigated by the payment of mandatory fees. Therefore, the GPA would not result in a cumulatively considerable contribution to cumulative impacts on schools. The GPA would not change the less than significant classification of the cumulative school capacity impact identified by the GP/CLUP Final EIR.

Private Utility Services

The GP/CLUP Final EIR found that there would not be a cumulatively considerable contribution to cumulative impacts on private utility services because the utility companies have indicated that they could supply future demand without jeopardizing existing service. Adequate capacity would be available for the incremental increase in demand for private utility services resulting from development associated with the GPA. Therefore, the GPA would not result in a cumulatively considerable contribution to cumulative impacts on private utility services. The GPA would not change the classification of these cumulative impacts as less than significant.

Libraries

The GP/CLUP Final EIR found that there would not be a cumulatively considerable contribution to cumulative impacts on libraries because implementation of GP/CLUP policies along with payment of applicable development impact fees would reduce impacts on libraries resulting from current and future demand to less than significant levels. These same policies and fees would be applicable to development that would result from the GPA. Therefore, the GPA would not result in a cumulatively considerable contribution to cumulative impacts on libraries. The GPA would not change the classification of these cumulative impacts as less than significant.

Parks and Recreation

Cumulative impacts on parks and recreation facilities are addressed in Section 4.8 (Land Use and Recreation).

4.11.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation is required.

Residual Impacts. Following implementation of the GP/CLUP policies related to the Class II impacts on public services and facilities, the impacts of the GPA would be reduced to less than significant levels.

4.11.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its public services and utilities impacts are identified below.

Policy CE 13: Energy Conservation [GP]

CE 13.1 Energy Efficiency in Existing and New Residential Development. [GP]

CE 13.3 Use of Renewable Energy Sources. [GP]

Policy PF 3: Public Safety Services and Facilities [GP]

PF 3.1 Fire Protection Standards. [GP]

PF 3.2 New Fire Station in Western Goleta. [GP/CP]

PF 3.3 Impact Fees for Fire Protection Facilities/Equipment. [GP]

PF 3.4 Fire Safety in New Development. [GP/CP]

PF 3.6 Police Service Standards. [GP]

PF 3.7 Police Facilities. [GP]

PF 3.8 Impact Fee for Police Facilities. [GP]

PF 3.9 Safety Considerations in New Development. [GP]

Policy PF 4: Water and Sewer Facilities [GP/CP]

PF 4.1 Water Facilities and Services. [GP/CP]

PF 4.2 Sewer Facilities and Services. [GP/CP]

PF 5: School Facilities [GP]

PF 5.2 Assessment of School Impacts of Large Development Projects. [GP]

PF 5.7 School Impact Fees. [GP]

Policy PF 6: Utilities [GP]

PF 6.1 Referral of Development Applications. [GP]

PF 6.2 Undergrounding of Overhead Utilities. [GP]

Policy PF 9: Coordination of Facilities with Future Development [GP/CP]

PF 9.2 Phasing of New Development. [GP/CP]

PF 9.3 Responsibilities of Developers. [GP/CP]

PF 9.7 Essential Services for New Development. [GP/CP]

Policy HE 4: Energy Conservation and Sustainable Development [GP]

HE 4.2 Resource Conservation in Existing and New Residential Development.

HE 4.3 Use of Renewable Energy Sources.

4.12 TRANSPORTATION AND CIRCULATION

Section 3.13 of the GP/CLUP Final EIR describes the following within the existing City boundary:

- Environmental setting (existing conditions and regulatory setting) for transportation and circulation relating to buildout of the GP/CLUP.
- The impacts associated with transportation and circulation that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

4.12.1 Physical Setting

The existing conditions description included in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including roadways, public transit, passenger rail service, and non-motorized transportation.

The primary ingress/egress for the project site is from Calle Real. Arterial roadways near the project site include Calle Real west of Glen Annie Road, and Storke Road north of Hollister Avenue. These roadways currently carry volumes within the City's acceptable capacity designations for arterial roadways.

Major intersections in the project area include: Cathedral Oaks Road at Glen Annie Road; U.S. 101 northbound ramps at Storke Road; U.S. 101 southbound ramps at Storke Road; and Hollister Avenue at Storke Road. Each of these intersections operate at LOS C or better during the morning (A.M.) and evening (P.M.) peak hours, which is considered acceptable based on the City's LOS operating standards.

4.12.2 Regulatory Setting

The description of the regulatory framework in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including the discussions of federal, state, and local regulations.

Since adoption of the GP/CLUP, the City, County, and UCSB entered into a Mitigation Implementation and Settlement Agreement (2010 UCSB Long Range Development Plan Mitigation Implementation and Settlement Agreement) related to overlapping jurisdiction with various property boundaries. It was determined that, with implementation of the UCSB 2010 LRDP, increased enrollment could impact City and County housing, traffic, and other public services beyond that identified in the 2010 LRDP EIR. UCSB will pay traffic mitigation fees based on specified traffic volume monitoring criteria.

4.12.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta LOS Standard

The City has adopted a standard of Level of Service (LOS) C. Based upon this standard, a significant impact was identified if the project would result in any of the following:

- Analysis showed that the 2030 buildout would result in violation of the standard, as compared to existing conditions.

- Analysis showed that the LOS standard would be violated under existing conditions, but that a higher congestion level would be expected to result from the 2030 buildout.

City of Goleta Environmental Thresholds and Guidelines Manual

The threshold criteria established by the City provide a basis for the analysis of the potential traffic impacts of the GPA. The following threshold criteria assume that an increase in traffic that creates a need for road improvements is "substantial in relation to the existing traffic load and capacity of the street system." It should be noted that the following criteria are guidelines for the majority of potential impacts. The list of criteria is not intended to be all-inclusive because the potential for impact may vary depending upon the environmental setting and the nature of the project.

Threshold Criteria—Significant Adverse Impact

A significant traffic impact occurs when:

1. The addition of project traffic to an intersection increases the volume to capacity ratio (V/C) by the value provided in Table 4.12-1, or adds at least 5, 10, or 15 trips to intersections operating at LOS F, E, and D, respectively.

Table 4.12-1
City of Goleta LOS Significance Thresholds

LOS (including project)[1]	Increase in V/C greater than
A	0.20
B	0.15
C	0.10
	Or the addition of:
D	15 trips[2]
E	10 trips[2]
F	5 trips[2]

[1] The adopted standard for City roadways and intersections is LOS C, with the exception of the intersection of Hollister Avenue/Storke Road, which has been built to its planned capacity, and thus under GP/CLUP policy subsection TE 4.2 has a standard of LOS D.

[2] For purposes of analysis of the 2030 buildout, it was conservatively assumed that any increase in V/C projected over existing conditions reflects an increase of at least the threshold number of trips defined in this table, indicating a significant impact.

2. Project access to a major road or arterial road would require a driveway that would create an unsafe situation or a new traffic signal or major revisions to an existing traffic signal.

3. Project adds traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) or receives use which would be incompatible with substantial increases in traffic (e.g., rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use) that will become potential safety problems with the addition of project or cumulative traffic. Exceedance of the roadway's designated Transportation Element Capacity may indicate the potential for the occurrence of the above impacts.

4. Project traffic would utilize a substantial portion of an intersection's capacity where the intersection is currently operating at acceptable LOS (A through C) but with cumulative traffic would degrade to or approach LOS D (V/C 0.80) or lower. Substantial is defined as a minimum change of 0.03 V/C for intersections that would operate from 0.80 to 0.85 V/C and a change of 0.02 V/C for intersections that would operate from 0.86 to 0.90 V/C, and 0.01 V/C for intersections operating at anything lower.

If analysis of the 2030 buildout showed that these thresholds would be exceeded when compared to existing conditions, a significant impact was identified.

CEQA Thresholds

Criteria for determining the significance of impacts related to transportation are based upon criteria contained in Appendix G of the CEQA Guidelines. The proposed project would have a significant impact on the environment if it would result in any of the following:

- Cause an increase in traffic that is substantial in relation to the existing traffic volumes and capacity of the roadway system (e.g., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections).
- Exceed, either individually or cumulatively, a LOS standard established by local jurisdictions for designated roadways or highways.
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks.
- Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Result in inadequate emergency access.
- Result in inadequate parking capacity.
- Conflict with adopted policies supporting alternative transportation.

Traffic projected as a result of the 2030 buildout was considered significant if, as compared to existing conditions, it is expected to result in violation of either the City's adopted LOS standard or the LOS significance thresholds, as previously described.

4.12.4 Impact Evaluation

Class I Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

The GP/CLUP Final EIR did not identify any short-term Class I impacts (significant and unavoidable impacts) related to transportation or circulation. Program-level impacts resulting from buildout of the GP/CLUP are not transient in nature and are thus considered long-term impacts. Similarly, no additional short-term Class I impacts would result with the GPA.

Long-term Impacts

The GP/CLUP Final EIR identified the following long-term Class I impacts related to transportation and circulation.

Impact 3.13-1 Exceed, Either Individually or Cumulatively, a LOS Standard Established by Local Jurisdictions for Designated Roadways or Highways.

The GP/CLUP Final EIR identified one intersection where a long-term significant and unavoidable transportation/circulation impact would occur: at Hollister Avenue and Storke Road. The City considers LOS C as the minimum acceptable operating standard for all intersections, with the exception of the Storke Road/Hollister Avenue intersection, which has an acceptable operation standard of LOS D because the intersection is built to its planned capacity (under GP/CLUP policy subsection TE 4.2). During the PM peak hour, this intersection currently operates at LOS C, but was forecasted to operate at LOS E under buildout of the GP by the GP/CLUP Final EIR.

The GPA would allow up to 28 additional dwelling units at the project site for a total development potential of 60 residential units. Based on the traffic analysis provided by the Draft Kenwood Village Project-Specific EIR (City of Goleta, 2016), development of the project site would result in the addition of 12 P.M, peak hour trips to the Storke Road/Hollister Avenue intersection. The analysis concluded that based on the City's significance thresholds, traffic generated by the Project would not result in project-specific impacts to the Storke Road/Hollister Avenue intersection. Therefore, the additional 28 dwelling units at the project site allowed by the GPA would not result in a significant traffic impact at the Storke Road/Hollister Avenue intersection.

The project-specific analysis of cumulative impacts determined that development of the project site would result in a volume/capacity increase of 0.003 at the Storke Road/Hollister Avenue intersection, which would not result in a significant impact based on the City's cumulative traffic impact threshold of a volume to capacity increase of 0.03 or more. The project-specific traffic analysis also concluded that under cumulative conditions (buildout of the GP/CLUP), the intersection is projected to operate at LOS D. The segment of Storke Road north of Hollister Avenue was recently widened to include three travel lanes in the northbound direction (five lanes total), which has resulted in improved future intersection operations.

Therefore, the GPA would not increase the identified significant and unavoidable impact identified in the GP/CLUP Final EIR related to the Storke Road/Hollister Avenue intersection and Impact 3.13-1 would remain classified as significant and unavoidable (Class I).

Class II Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

The GP/CLUP Final EIR did not identify any short-term Class II impacts (significant impacts reduced to less than significant with mitigation) related to transportation or circulation. Program-level impacts resulting from buildout of the GP/CLUP are not transient in nature and are thus considered long-term impacts. Similarly, no additional short-term Class II impacts would result with the GPA.

Long-term Impacts

The GP/CLUP Final EIR identified the following long-term Class II impacts related to transportation and circulation.

Impact 3.13-2 Exceed, Either Individually or Cumulatively, a LOS Standard Established by Local Jurisdictions for Designated Roadways or Highways.

Intersections

The GP/CLUP Final EIR identified intersections where significant but mitigable impacts would occur as a result of additional traffic from buildout of the GP/CLUP. With the implementation of mitigation measures identified by the GP/CLUP Final EIR, traffic impacts at the following intersections would be reduced to a less than significant level:

- Hollister Avenue/Canon Green Drive
- Hollister Avenue/Pacific Oaks Road
- Cathedral Oaks/Los Carneros Road
- Los Carneros Road/Calle Real Road
- Los Carneros Road/U.S. 101 SB Ramp
- Los Carneros Road/Hollister Avenue
- Fairview Avenue/Stow Canyon Road
- Fairview Avenue/Calle Real
- Fairview Avenue/U.S. 101 NB Ramp
- Hollister Avenue/Fairview Avenue
- Hollister Avenue/Kellogg Avenue
- Hollister Avenue/SR-217 SB Ramp
- Patterson Avenue/U.S. 101 NB Ramp
- Patterson Avenue/U.S. 101 SB Ramp
- Hollister Avenue/Patterson Avenue
- Fairview Avenue/U.S. 101 SB-Ramp

Development on the project site that would be allowed by the GPA could increase traffic at the intersections identified above, but would not result in significant impacts to those intersections (City of Goleta, 2016). Therefore, the GPA would not result in changes to the intersection impacts described in Impact 3.13-2. In addition, the GP/CLUP Final EIR identifies policies that would reduce intersection impacts to a less than significant level. Those policies relate to use of an integrated multi-modal transportation system, improving planned streets and roads, establishing target LOS standards, implementing mitigation of traffic impacts of specific development, and other relevant transportation policies contained in the GP/CLUP. As

determined in the GP/CLUP Final EIR, the GP/CLUP policies would reduce intersection impacts associated with the GPA to less than significant levels. Although the GPA would incrementally increase the intersection impacts described in Impact 3.13-2, it would not change the Class II classification (less than significant with mitigation).

Roadway Segments

The GP/CLUP Final EIR identified the following roadway segments where significant transportation/circulation impacts would occur because the projected average daily trips (ADT) associated with buildout by 2030 would exceed the LOS C threshold:

- Storke Road south of U.S. 101
- Los Carneros Road south of Hollister Avenue
- Storke Road south of Whittier Drive

Development of the project site that would be allowed by the GPA would affect the Storke Road south of U.S. 101 roadway segment. Based on the traffic analysis included in the Draft Kenwood Village Project-Specific EIR (City of Goleta, 2016), after the addition of project-generated traffic, Storke Road north of Hollister Avenue/south of U.S. 101 is forecast to operate within its acceptable capacity rating. The project-specific analysis of cumulative impacts determined that under cumulative and cumulative plus project conditions, Storke Road north of Hollister Avenue/south of U.S. 101 is forecast to carry volumes within its acceptable capacity rating.

Since development on the project site that would be facilitated by the GPA (a total of 60 units) would not result in significant impacts to the Storke Road north of Hollister Avenue/south of U.S. 101 roadway segment, the GPA, which would facilitate the development of 28 additional units on the project site, would not result in changes to the roadway operation impacts described in Impact 3.13-2. In addition, the GP/CLUP Final EIR identifies policies that would reduce roadway impacts to a less than significant level. Those policies relate to use of an integrated multi-modal transportation system, improving planned streets and roads, establishing target LOS standards, implementing mitigation of traffic impacts of specific development, and other relevant transportation policies contained in the GP/CLUP. As determined in the GP/CLUP Final EIR, the GP/CLUP policies would reduce roadway operation impacts associated with the GPA to less than significant levels. Although the GPA would incrementally increase the roadway operation impacts described in Impact 3.13-2, it would not change the Class II classification (less than significant with mitigation).

Class III Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

The GP/CLUP Final EIR did not identify any short-term Class III impacts (less than significant impacts) related to transportation or circulation. Program-level impacts resulting from buildout of the GP/CLUP are not transient in nature and are thus considered long-term impacts. Similarly, no additional short-term Class III impacts would result with the GPA.

Long-term Impacts

The GP/CLUP Final EIR identified the following long-term Class III impacts related to transportation and circulation.

Impact 3.13-3 Increased Traffic Volumes, Either Individually or Cumulatively, without Violation of LOS Standards Established by Local Jurisdictions for Designated Roadways or Highways.

Intersections

The GP/CLUP Final EIR identified the following intersections where less than significant transportation/circulation impacts would occur:

- Hollister Avenue/Calle Real
- Hollister Avenue/Entrance Road
- Storke Road/Market Place Drive
- Storke Road/Phelps Road
- Cathedral Oaks/Glen Annie Road
- Glen Annie Road/Del Norte Drive
- Glen Annie Road/Calle Real/U.S. 101 NB Ramp
- Storke Road/U.S. 101 SB Ramp
- Cathedral Oaks/Alameda Avenue
- Los Carneros Road/U.S. 101 NB Ramp
- Los Carneros Road/Calle Koral Road
- Los Carneros Road/Castilian Drive
- Los Carneros Road/Hollister Avenue
- Hollister Avenue/Aero Camino Road
- Hollister Avenue/La Patera Lane
- Cathedral Oaks/Fairview Avenue
- Fairview Avenue/Encina Lane
- Hollister Avenue/Pine Avenue
- Hollister Avenue/Rutherford Street
- Cathedral Oaks/Cambridge Drive
- Calle Real/Kellogg Avenue
- Hollister Avenue/SR-217 NB Ramp
- Patterson Avenue/Overpass Road

- Ellwood Station Road/Calle Real
- Hollister Avenue/U.S. 101 SB Ramp
- Winchester Canyon Road/Calle Real
- Cathedral Oaks/Hollister Avenue

The GPA could contribute traffic at some of these intersections, including:

- Hollister Avenue/Calle Real
- Cathedral Oaks/Glen Annie Road
- Glen Annie Road/Calle Real/U.S. 101 NB Ramp
- Storke Road/U.S. 101 SB Ramp
- Cathedral Oaks/Alameda Avenue
- Ellwood Station Road/Calle Real
- Hollister Avenue/U.S. 101 SB Ramp
- Winchester Canyon Road/Calle Real

Roadway Segments

The GP/CLUP Final EIR identified the following roadway segments where less than significant impacts would occur because the projected ADT with the 2030 buildout would increase but would not exceed the LOS C threshold:

- Hollister Avenue west of Patterson Avenue
- Hollister Avenue west of Fairview Avenue
- Hollister Avenue east of Los Carneros Road
- Hollister Avenue east of Storke Road
- Hollister Avenue east of U.S. 101 Interchange
- Cathedral Oaks Road east of Fairview Avenue
- Cathedral Oaks Road east of Los Carneros Road
- Cathedral Oaks Road west of Glen Annie Road
- Cathedral Oaks Road north of U.S. 101 Interchange
- Calle Real east of Los Carneros
- Calle Real west of Glen Annie Road
- Storke Road north of U.S. 101 Interchange
- Los Carneros Road north of U.S. 101 Interchange
- Los Carneros Road south of U.S. 101 Interchange
- Fairview Avenue north of Calle Real

- Fairview Avenue south of U.S. 101 Interchange
- Patterson Avenue south of U.S. 101 Interchange

The GPA could potentially contribute traffic at some of these roadway segments, including the following, but the impacts would not exceed the LOS C threshold:

- Calle Real west of Glen Annie Road
- Storke Road north of U.S. 101 Interchange

Traffic generated by the additional units facilitated by the GPA would incrementally increase Impact 3.13-3, but would not change its classification as Class III (less than significant).

Class IV Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

The GP/CLUP Final EIR did not identify any short-term Class IV impacts (beneficial impacts) related to transportation or circulation. Program-level impacts resulting from buildout of the GP/CLUP are not transient in nature and are thus considered long-term impacts. Similarly, no additional short-term Class IV impacts would result with the GPA.

Long-term Impacts

The GP/CLUP Final EIR identified the following long-term Class IV impacts related to transportation and circulation.

Impact 3.13-4 LOS under 2030 Buildout Is Expected to Improve or Remain Unchanged at Hollister Avenue/Market Place Drive and Cathedral Oaks/Calle Real.

The GP/CLUP Final EIR identified that the LOS at the intersections of Hollister Avenue/Market Place Drive and Cathedral Oaks/Calle Real would remain unchanged or would improve under conditions at buildout of the GP/CLUP in 2030. The additional development allowed by the GPA could add traffic to these intersections, thereby reducing these beneficial impacts, but would not result in significant adverse impacts.

Impact 3.13-5 No Impacts to Air Traffic Patterns.

The GP/CLUP Final EIR identified that no adverse impacts to air traffic patterns would result from implementation of the GP/CLUP. The additional development allowed by the GPA would not result in changes to air traffic patterns.

Impact 3.13-6 Increase Transit Ridership and Support Alternative Modes of Transportation.

The GP/CLUP Final EIR identified beneficial impacts associated with proposed bicycle and pedestrian plans and increased ridership as a result of GP/CLUP implementation. The GPA would not alter the development or implementation of these proposed bicycle and pedestrian plans. Implementation of the GPA would facilitate the construction of local pedestrian

circulation enhancements, including additional sidewalks adjacent to the project site, and on-site trails that would be available to the public. Also, the additional development allowed by the GPA would not significantly increase ridership on local public transit systems. Therefore, the GPA would not affect this impact.

4.12.5 Cumulative Impacts

The analysis presented in this section reflects cumulative conditions.

4.12.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation is required.

Residual Impacts. The GP/CLUP Final EIR identified significant and unavoidable impacts at the Hollister Avenue/Storke Road intersection. The GPA would not affect this finding. At other intersections and roadway segments where significant impacts were identified in the GP/CLUP Final EIR, the implementation of GP/CLUP policies would reduce impacts of the GPA to less than significant levels.

4.12.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its transportation and circulation impacts are identified below.

Policy TE 1: Integrated Multi-Modal Transportation System [GP/CP]

TE 1.2 Transportation and Land Use. [GP/CP]

TE 1.4 Multi-Use Street System. [GP/CP]

Policy TE 3: Streets and Highways Plans and Standards. [GP]

TE 3.3 Major Arterials. [GP/CP]

TE 3.6 Local Streets and Roads. [GP/CP]

TE 3.9 Right-of-Way Dedications and Improvements. [GP/CP]

Policy TE 4: Target Level of Service Standards [GP]

TE 4.1 General Level of Service Standard. [GP]

TE 4.6 LOS Effects of Future Land Use Plan Amendments. [GP]

Policy TE 6: Street Design and Streetscape Character [GP]

TE 6.3 Drainage. [GP]

TE 6.7 Widths of Paved Surfaces. [GP]

TE 6.8 Street Lighting. [GP]

Policy TE 9: Parking [GP/CP]

TE 9.1 Off-Street Parking. [GP/CP]

TE 9.2 Adequacy of Parking Supply in Proposed Development. [GP/CP]

TE 9.3 Parking in Residential Neighborhoods. [GP/CP]

Policy TE 10: Pedestrian Circulation [GP]

TE 10.4 Pedestrian Facilities in New Development. [GP]

Policy TE 13: Mitigating Traffic Impacts of Development [GP]

TE 13.1 Traffic Studies for Development Proposals. [GP]

TE 13.2 Content of Traffic Studies. [GP]

TE 13.3 Maintenance of LOS Standards. [GP]

TE 13.5 Developer-Constructed Transportation Improvements. [GP]

Policy TE 14: Financing Transportation Improvements [GP]

TE 14.1 Traffic Impact Fees. [GP]

4.13 WATER RESOURCES

Section 3.9 of the GP/CLUP Final EIR describes the following within the existing City boundary:

- Environmental setting (existing conditions and regulatory setting) water resources relating to buildout of the GP/CLUP.
- The impacts associated with water resources that would result from buildout of the GP/CLUP.
- Mitigation measures that would reduce these impacts.

4.13.1 Physical Setting

The existing conditions description in the GP/CLUP Final EIR is incorporated by reference into this SEIR, including surface water, groundwater, flooding, discharge controls, and water supply and demand.

Drought Emergency. In response to on-going drought conditions, on September 9, 2014 the GWD Board of Directors adopted Resolution 2014-31 declaring a Stage II Water Shortage Emergency consistent with the criteria contained the District's *Drought Preparedness and Water Shortage Contingency Plan.* The Board of Directors also adopted Resolution 2014-32 directing the denial of applications for new and additional service connections for potable water beginning on October 1, 2014. Projects with existing entitlement to potable water are exempt from the restrictions on new and additional service connections. A letter from Ryan Drake, GWD Water Supply & Conservation Manager, dated December 14, 2015, states that the project site meets this exemption for 1.86 acre feet per year.

On May 12, 2015, the GWD Board of Directors declared a Stage III Water Shortage Emergency (Resolution 2015-20). Achieving Stage III water demand reduction targets will rely on water use limits and prohibitions to reduce non-essential uses, coupled with the implementation of a drought surcharge to achieve a 35 percent system-wide demand reduction.

Since declaring a Stage I Water Shortage in March 2014, there has been a 12 percent reduction in the District's system-wide water demand compared to 2013 water use, which includes a significant unanticipated increase in agricultural demand. While this falls short of the District's 25 percent reduction target for Stage II, District customers remain one of the lowest per capita water users in the State (GWD, 2015a).

4.13.2 Regulatory Framework

Wright Judgement. GWD's rights to groundwater drawn from the Goleta Groundwater Basin were adjudicated through *Wright v. Goleta* Water District court case in 1985. The Wright Judgment gave the GWD the right to pump up to 2,000 AFY from the Basin in addition to the right to surplus waters, injected water, return flows, and rights transferred from private pumpers. Based on these conditions, the GWD has conservatively reported an entitlement of 2,350 AFY

from the Basin. The Wright Judgment also gave GWD the right to inject excess surface water supplies into the Basin to recharge the Basin and replenish groundwater supplies.

Goleta Water District SAFE Water Supplies Ordinance of 1991. The Safe Water Supplies Ordinance (SAFE) was approved by GWD voters in 1991 and amended in 1994. SAFE sets certain restrictions on GWD use of groundwater, including the creation of a "Drought Buffer" of water that is stored in the Central Basin, which may be pumped and distributed by the GWD to existing customers only in the event that a drought causes a reduction in the District's annual deliveries from Lake Cachuma. The Drought Buffer supplies may not be used as a source of supplemental water supply to serve new or additional demands for District water. SAFE also restricts deliveries to new developments by limiting the release of water to new customers to one percent of its total potable water supply. A determination of available water allocation for new uses is made on an annual basis. The SAFE Ordinance also continued an existing prohibition on new service connections until water supplies for existing customers were secured. Those conditions were met in 1997.

The SAFE ordinance prohibits the District from providing new or additional service connections except when the following conditions are met:

a. The District is receiving 100% of its deliveries normally allowed from the Cachuma Project;

b. The District has met its legal obligations required by the judgment in Wright v Goleta Water District;

c. Water rationing by the District is eliminated; and

d. The District has met its obligation to make its Annual Storage Commitment to the Drought Buffer.

The GWD was notified by the Cachuma Operations and Maintenance Board in early 2015 that for the water year that runs from October 1, 2014 to September 30, 2015, the District will receive only 45% of its normal water deliveries from the Cachuma Project. As a result, condition (a) above is no longer being met, and new or additional service connections are not allowed under the Safe Ordinance requirements.

2010 Urban Water Management Plan Update (2011). An Urban Water Management Plan (UWMP) is a planning tool that generally discloses the actions of water management agencies. Every five years, water suppliers such as the GWD are required to update the UWMP. The California Urban Water Management Planning Act requires preparation of an UWMP that: demonstrates water supply planning over a 20-year period in five-year increments; identifies and quantifies adequate water supplies, including recycled water, for existing and future demands, in normal, single-dry, and multiple-dry years; an implements conservation and efficient use of urban water supplies.

GWD Drought Preparedness and Water Shortage Contingency Plan (2014). The objectives of this Plan are to describe the conditions that constitute a water shortage emergency; to define and discuss the various stages of action in response to water shortages; and provide guidance and procedures to undertake during a declared water shortage. The Plan allows the District to identify and quickly respond to shortage in a manner that provides for public health and safety while minimizing the impacts to customers.

Executive Order B-29-15. On April 1, 2015 Governor Brown issued Executive Order B-29-15, which requires for the first time in the State's history the implementation of mandatory conservation for all residents, and directs several state agencies, including the State Water Resources Control Board (SWRCB), to take immediate action to safeguard the state's remaining potable urban water supplies.

4.13.3 Thresholds of Significance

The following thresholds of significance were used for the GP/CLUP Final EIR and for this SEIR.

City of Goleta Environmental Thresholds and Guidelines Manual

The following thresholds would be applicable to individual future projects that may occur on the project site. A significant water quality impact is presumed to occur if a project:

1. Is located within an urbanized area of the City and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land.
2. Increases the amount of impervious surfaces on a site by 25% or more.
3. Results in channelization or relocation of a natural drainage channel.
4. Results in removal or reduction of riparian vegetation or other vegetation (excluding nonnative vegetation removed for restoration projects) from the buffer zone of any streams, creeks, or wetlands.
5. Is an industrial facility that falls under one or more of categories of industrial activity regulated under the National Pollutant Discharge Elimination System (NPDES) Phase I industrial stormwater regulations (facilities with effluent limitation; manufacturing; mineral, metal, oil and gas, hazardous waste, treatment or disposal facilities; landfills; recycling facilities; steam electric plants; transportation facilities; treatment works; and light industrial activity).
6. Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB's) Basin Plan, or otherwise impairs the beneficial uses of a receiving waterbody.
7. Results in a discharge of pollutants into an impaired waterbody that has been designated as such by the State Water Resources Control Board (SWRCB) or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act).

8. Results in a discharge of pollutants of concern to a receiving water body, as identified by the RWQCB.

CEQA Thresholds

The following thresholds, based on Appendix G of the CEQA Guidelines, provide that a project may have a significant impact on water resources if it would result in any of the following:

1. Violate any water quality standards or waste discharge requirements.

2. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

4. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would increase flooding on- or off-site.

5. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

6. Otherwise substantially degrade water quality.

7. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

8. Place within a 100-year flood hazard area structures which would impede or redirect flood flows.

9. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

10. Result in inundation by seiche, tsunami, or mudflow.

11. Have insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

4.13.4 Impact Evaluation

Class I Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify any Class I impacts (significant and unavoidable impacts) related to water resources. Any short-term or long-term impacts related to water resources resulting from buildout of the GP/CLUP are classified as either Class II or Class III. No additional Class I impacts would result with the GPA.

Class II Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR identified the following Class II impacts (significant impacts reduced to less than significant with mitigation) related to water resources.

Short-term Impacts

Impact 3.9-1 Degradation of Water Quality from Construction-Related Contaminants

The GP/CLUP Final EIR identified significant impacts associated with construction-related earth disturbing activities for future development and infrastructure projects associated with buildout of the GP/CLUP. Impacts may include soil erosion, sedimentation of local waterways, and hazardous materials leaks. The GPA could result in a small increase in construction-related impacts due to earth-disturbing activities on the additional lands made available for development by the GPA.

The GP/CLUP Final EIR identified policies related to the protection of creeks, riparian areas, and wetlands and to watershed management and water quality that would reduce Impact 3.9-1 to a less-than-significant level. Similarly, these policies would also reduce impacts associated with additional development allowed by the GPA to less-than-significant levels. Therefore, the GPA would incrementally increase Impact 3.9-1, but would not change its classification as Class II (less than significant with mitigation).

Long-term Impacts

Impact 3.9-2 Adequacy of Water Supplies to Serve New Development.

The GP/CLUP Final EIR identified significant impacts associated with inadequate water supplies during a critical dry year. The additional development allowed by the GPA could result in a small increase in water demand and slightly increase the potential for inadequate water supplies during a critical dry year.

The GP/CLUP Final EIR identified policies that would reduce Impact 3.9-2 to a less than significant level. Those policies include requirements to ensure that water supplies are adequate to serve proposed development, including phasing development in the City until resources can be identified that provide adequate supplies and improvements. Additionally, development will be allowed only when and where all essential utility services are adequate based on the service standards of their providers and without reducing levels of service below the level of service guidelines.

Water demand for development that could be facilitated by the GPA was calculated using demand factors contained in the City of Santa Barbara's Water Demand Factor Update Report (2009) for single family residences with lot sizes less than 7,000 square feet (0.0.26 AFY per unit) and multi-family units (0.16 AFY per unit). These factors were developed from data based on 2006 and 2007 usage, which included both an average rainfall year and a low rainfall year to establish an average water use.

GWD average water use per parcel for single family properties of all sizes is 0.34 AFY and 0.20 AFY for multi-family units (GWD 2015). This is based on the 2012-2013 water year when there were no drought restrictions and thus reflects normal water use. For this analysis, water demand using the GWD average for the 2012-2013 water year were used because they are higher (more conservative) than the City of Santa Barbara demand factors.

Based on the project site's existing land use designations, approximately 32 residential units could be constructed on the project property.[6] Therefore, the proposed GPA would result in an increase of 28 units (60 -32 = 28) when compared to the maximum amount of development that could occur under the site's existing land use designations. The water demand of the additional 28 units would depend on the unit mix (i.e., the number of single-family dwellings and the number of multi-family units), but would range between 9.52 AFY if all 28 were single-family dwellings, and 5.6 AFY if all 28 were multi-family units.

Buildout of the project site with 60 units (13 single family units plus 47 multi-family units) as would be facilitated by the proposed GPA would result in a water demand of 13.82 AFY. This estimate is conservative and does not include recently enacted state and local water conservation requirements. This estimate is also is higher than the GWD's current residential demand factors, which are lower than normal due to restrictions based on the current drought and may not continue when the drought conditions no longer exist. The factors used to estimate the water demand of the GPA are based on more typical conditions that have occurred in the past, and are appropriate for long-term planning.

The project site water demand estimate also is based on the use of potable water for landscape irrigation. If recycled water were included as a source, the demand for potable water would be lower. A recycled water service pipeline is located near the project site, therefore, it would be feasible for recycled water to be used on the project site for irrigation purposes.

A project site water demand of 13.82 AFY would only be approximately 0.45 percent of GWD's existing water supply surplus (3,070 AFY) that exists during normal water supply conditions. However, project site buildout demand would exceed the project site's existing water right of 1.86 AFY. This would result in a significant impact because the project site does not have water rights sufficient to support 60 residences and the project site would require additional water service from GWD. As described in Section 4.13.1 new water service is not available from GWD due to the declared drought emergency.

[6] Please refer to Population and Housing Section 4.10.4 for a more detailed description of development that could occur on the project site based on its existing land use designations.

As described in the GP/CLUP Final EIR, policies are in place that would reduce water supply impacts of the GPA to less than significant levels because development could not occur unless there was sufficient water available. Therefore, the GPA would incrementally increase Impact 3.9-2, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.9-3 Changes in Groundwater Supply Resulting from New Development

The GP/CLUP Final EIR identified significant impacts associated with the increased amounts of impervious surfaces and the decreased amount of rainfall reaching the groundwater basin. The development of the project site as a result of the GPA could result in an increase in impervious surfaces and reduction in groundwater recharge.

The GP/CLUP Final EIR identified policies related to the protection of creeks and riparian areas, water management and water quality, and water conservation that would reduce Impact 3.9-3 to a less than significant level. Those same policies would also reduce impacts associated with the GPA to less than significant levels. Therefore, the GPA would incrementally increase Impact 3.9-3, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.9-4 Alterations in Existing Drainage Patterns and Downstream Flooding and Erosion.

The GP/CLUP Final EIR identified significant impacts associated with the increased amounts of impervious surfaces causing increased drainage flows and earlier peak flows, with the potential to cause flooding or erosion impacts downstream. The development of the project site as would be allowed by the proposed GPA could result in an increase in impervious surfaces affecting drainage flows, peak flows, flooding, and erosion similar to those described in the GP/CLUP Final EIR.

The GP/CLUP Final EIR identified policies related to land use planning, protection of creeks and riparian areas, watershed management and water quality, public facilities standards, safety, flood hazards, and street design and streetscape that would reduce Impact 3.9-4 to a less-than-significant level. Those policies would also reduce impacts associated with the GPA to less-than-significant levels. Therefore, the GPA would incrementally increase Impact 3.9-4, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.9-5 Construction of Structures or Housing in a 100-Year Flood Hazard Area.

The project site is not within areas subject to a 100-year floodplain. Therefore, the GPA would not result in changes to Impact 3.9-5 as described in the GP/CLUP Final EIR.

Impact 3.9-6 Risk to New Development from Inundation by a Tsunami, Mudslide, or Seiche.

The GP/CLUP Final EIR identified significant impacts associated with tsunami run-up and mudslides. The project site would not be susceptible to tsunami run-up because it is not in the potential tsunami run-up area identified in the GP/CLUP Final EIR, but would be within

areas with slopes potentially subject to mudslides. A mudslide could cause significant damage to structures constructed on such slopes and also cause injury or death to people living in those structures.

The GP/CLUP Final EIR identified policies related to safety, seismic and seismically induced hazards, soil and slope stability hazards, emergency preparedness, and public facilities standards that would reduce Impact 3.9-6 to a less-than-significant level. Those policies would also reduce impacts associated with the GPA to less-than-significant levels. Therefore, the GPA would incrementally increase Impact 3.9-6, but would not change its classification as Class II (less than significant with mitigation).

Impact 3.9-7 Increases in Point Source and Nonpoint Source Pollution from New Development.

Point source water pollution results from a discernible, confined, and discrete conveyance of pollutants, such as an industrial plant. Nonpoint source water pollution comes from many diffuse sources such as contaminants that are absorbed by rain and conveyed to lakes, rivers, wetlands, coastal waters and ground waters. These contaminants include oils and volatile organic compounds from roadways and parking lots, and fertilizers and pesticides from lawn and landscape maintenance.

The GP/CLUP Final EIR identified significant impacts associated with nonpoint source pollution. It found that new development would increase the amount of nonpoint sources of wastewater generated, with corresponding increases in the volume of wastewater being discharged. It also identified potential point-source discharges associated with commercial or industrial uses that could adversely affect water quality.

The additional development allowed by the GPA could result in an increase in nonpoint source contaminants similar to those described in the GP/CLUP Final EIR. No point-source discharges would occur because the GPA would not involve commercial or industrial uses.

The GP/CLUP Final EIR identified policies related to the protection of creeks and riparian areas, watershed management and water quality, hazardous materials and facilities, energy, water and sewer facilities, and street design and streetscape that would reduce Impact 3.9-7 to a less-than-significant level. Those policies would also reduce impacts associated with the GPA to less-than-significant levels. Therefore, the GPA would incrementally increase Impact 3.9-7, but would not change its classification as Class II (less than significant with mitigation).

Class III Impacts Identified in the GP/CLUP Final EIR

Short-term Impacts

The GP/CLUP Final EIR did not identify short-term Class III impacts (less than significant impacts) related to water resources. Any short-term related to water resources resulting from buildout of the GP/CLUP are classified as Class II (as described above). The incremental increases in these impacts due to additional development allowed by the GPA would

not change their classification as Class II. No additional short-term Class III impacts would occur with the GPA.

Long-term Impacts

The GP/CLUP Final EIR identified the following long-term Class III impact (less than significant impact) related to water resources.

Impact 3.9-8 Risk to New Development from Dam Failure and Resultant Flooding.

The GP/CLUP Final EIR identified a less-than significant impact associated with risk to new development from the unlikely failure of Bradbury Dam, which was built on the Santa Ynez River to create Lake Cachuma. A failure of the dam would affect areas downstream on the Santa Ynez River and would not directly affect the Goleta planning area. Therefore, the GPA would not result in changes to Impact 3.9-8 as described in the GP/CLUP Final EIR.

Class IV Impacts Identified in the GP/CLUP Final EIR

The GP/CLUP Final EIR did not identify Class IV impacts (beneficial impacts) related to water resources. Buildout of the GP/CLUP is not expected to result in any beneficial impacts to water quality or water supplies. Similarly, no additional Class IV impacts would occur with additional development allowed by the GPA.

4.13.5 Cumulative Impacts

Impact 3.9-9 Water Quality Impacts from Discharge to Surface Water Bodies Where Water Bodies Are 303(d) Listed.

The GP/CLUP Final EIR identified a significant and unavoidable (Class I) contribution to a significant impact to the water quality of Goleta Slough, which is listed as impaired under Section 303(d) of the Clean Water Act (codified at 33 U.S.C. §§ 1251, *et seq*.). The project site ultimately drains to the Devereux Slough and is not tributary to the Goleta Slough. Therefore, the GPA would not increase or reduce this significant and unavoidable cumulative impact.

Impact 3.9-10 Cumulative Effects on Water Supply.

The GP/CLUP Final EIR identified a less than significant (Class III) contribution to cumulative demand on the Goleta area's water supply. The North-Central portion of the Goleta Groundwater Basin (Basin) was adjudicated in the Wright Judgment, which determines the safe yield of the Basin and distributes appropriate groundwater pumping allocations to various users (including GWD) based on this safe yield. GWD would only pump its annual allocated quantity plus any banked groundwater supplies that are available and needed. Therefore, cumulative groundwater pumping would not exceed the safe yield and groundwater supplies would not be substantially depleted by development anticipated in the buildout of the GP/CLUP.

As evaluated for Impact 3.9-2 above, the development of 60 new residences on the project site would exceed the project site's available water right, and GWD cannot provide

additional water service at this time. The GP/CLUP includes policies, however, that would preclude any development unless adequate water supplies were available. Therefore, the GPA would incrementally increase Impact 3.9-10, but would not change its classification as Class III (less than significant).

4.13.6 Mitigation Measures and Residual Impacts

Modifications to General Plan Policies. No modifications to General Plan policies are required.

Other Suggested Mitigation. No mitigation is required.

Residual Impacts. The GP/CLUP Final EIR found that there would be no significant residual impacts related to water resources. Implementation of the GPA would also result in no significant residual impacts related to water resources.

4.13.7 Applicable Policies

General Plan policies that are applicable to the Project and when implemented would reduce its water resources impacts are identified below.

Policy CE 10: Watershed Management and Water Quality [GP/CP]

CE 10.1 New Development and Water Quality. [GP/CP]

CE 10.2 Siting and Design of New Development. [GP/CP]

CE 10.3 Incorporation of Best Management Practices for Stormwater Management. [GP/CP]

CE 10.4 New Facilities. [GP/CP]

CE 10.6 Stormwater Management Requirements. [GP/CP]

CE 10.7 Drainage and Stormwater Management Plans. [GP/CP]

CE 10.8 Maintenance of Stormwater Management Facilities. [GP/CP]

CE 10.9 Landscaping to Control Erosion. [GP/CP]

Policy CE 15: Water Conservation and Materials Recycling [GP]

CE 15.3 Water Conservation for New Development. [GP]

Policy SE 6: Flood Hazards [GP/CP]

SE 6.6 Enforcement of Watercourse Setback Ordinance. [GP/CP]

Policy PF 4: Water and Sewer Facilities [GP/CP]

PF 4.1 Water Facilities and Services. [GP/CP]