

PLANNING COMMISSION RESOLUTION 14-__
ATTACHMENT 1, EXHIBIT 4
GENERAL PLAN/COASTAL LAND USE PLAN CONSISTENCY ANALYSIS
ELLWOOD MESA COASTAL TRAILS AND HABITAT RESTORATION PROJECT
CASE NO. 13-039-DP

LAND USE ELEMENT

Policy LU 1: Land Use Plan Map and General Policies [GP/CP]

***Objective:** To maintain a land use pattern that provides continuity with the past and present use and development of the city and locates the various uses in a manner that is consistent with the fundamental goals and principles of the plan.*

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

Approvals of all new development shall require adherence to high environmental standards and the preservation and protection of environmental resources, such as environmentally sensitive habitats, consistent with the standards set forth in the Conservation Element and the City's Zoning Code.

Consistent: The Project is defined as "new development" in the General Plan, as this definition includes "grading, removing... of any materials." In this case, the Project would improve approximately 2.1 miles of existing coastal trails on Ellwood Mesa. Work would include drainage improvements to direct surface flows off of trails and improvements in trail tread surface such as leveling and eliminating ruts or ridges within the trail. Additionally, development is defined as "the placement or erection of any solid material or structure." The Project would also include the construction of engineered crossings (e.g., culverts or boardwalk bridges) to improve drainage. Consequently, the project's impact on environmental resources is analyzed within the Mitigated Negative Declaration ("MND") and requires mitigation measures including, but not limited to air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, recreation, and traffic as areas where there could be a significant impact, but the MND also sets out mitigation measures that would reduce the impacts to levels of insignificance. These measures have been incorporated into the conditions of approval for the project. As such, the project is consistent with LU 1.7.

Policy LU 6: Park and Open Space Uses [GP/CP]

***Objective:** To provide land areas for public parks, recreation, and open space land uses and private recreational lands within the city and recognize the importance of their contribution to the overall quality of life in Goleta.*

LU 6.2 Open Space/Passive Recreation. [GP/CP] This use category is intended to identify and reserve areas with significant environmental values or resources, wildlife habitats, significant views, and other open space values. It may be used to designate both private and public open space areas. The category includes areas reserved for natural drainage courses that may be managed as part of the City's stormwater management program. The following criteria and standards shall apply to lands within this designation:

- a. Open space lands are intended to maintain the land in a natural condition in order to protect and conserve sensitive habitats.
- b. Resource management activities, including, but not limited to, habitat restorations, are permitted.

- c. Minimal improvements to accommodate passive public use, such as trails, nature education, beach access, and public viewing areas, are permitted.
- d. Except for existing facilities, active recreational uses involving structures or improvements to the land shall not be permitted.
- e. Limited parking and public access improvements may be allowed provided that any adverse impacts on the associated resources are either avoided or mitigated.

Consistent: As the Project is proposing to improve the Open Space-designated area known as Ellwood Mesa. The Project does not propose a change in use from Passive to Recreational and meets the intention of a. through e. As such, the project is consistent with LU 6.2.

Policy LU 9: Coastal-Dependent and -Related Uses (Key Pacific Shoreline Sites) [GP/CP]

Objective: *To designate lands in appropriate locations near or on the shoreline for uses that are dependent upon coastal locations and cannot readily be provided at inland sites.*

LU 9.4 Site #4 – Santa Barbara Shores Park and Sperling Preserve Parcels (Open Space/Passive Recreation). [GP/CP] This group of parcels, with a total of about 229 acres, is owned by the City. These lands are subject to deed restrictions that require the use of the property to be restricted in perpetuity to passive recreational activities and habitat protection. The criteria applicable to these parcels are as follows (see Figure 2-2):

- a. All future actions shall be consistent with the primary purposes of (1) preserving and enhancing the properties' sensitive habitats, including habitats for monarch butterflies, various raptors, and western snowy plovers, as well as vernal pools, riparian areas, native grasslands, coastal scrub, and other sensitive aquatic and terrestrial habitats and (2) preserving or improving the past level of access and use by the public.
- b. Any development of structures shall be limited to a public restroom facility to be located at the public parking lot at Hollister Avenue.
- c. An extensive coastal access trail system shall be maintained, as shown in Figure 3-2 of the Open Space Element. The trails shall include segments of the California Coastal Trail and the Juan Bautista de Anza Historic Trail.
- d. Any trail improvements shall be designed to maintain the natural, low-impact appearance of the existing informal trails; surfacing materials shall be limited to compacted fines or native soil materials without binders. The widths of trails shall be the minimum necessary to accommodate the planned types of users.
- e. A public coastal access parking lot, not to exceed 45 parking spaces, shall be maintained at Santa Barbara Shores Park, with vehicular access from Hollister Avenue.
- f. Any ornamental landscaping shall be limited to native species that will maintain the natural appearance of the area and that will not impair or obstruct scenic views from Hollister Avenue to the coastal bluffs, Pacific Ocean, and Channel Islands and preserve views from within the property to the Santa Ynez Mountains. (See related Policy OS 5 and Figures 3-3 and 3-4.)

Consistent: The Project is proposing to improve the existing trail system located in the Santa Barbara Shores Park and Sperling Preserve Parcels (Open Space/Passive Recreation). The Project relates directly to the applicable criteria: “d) any trail improvements shall be designed to maintain the natural, low-impact appearance of the existing informal trails; surfacing materials shall be limited to compacted fines or native soil materials without binders. The widths of trails shall be the minimum necessary to accommodate the planned types of users.” The Project would realign approximately 0.54 miles of trail around sensitive areas in conformance with the General Plan. The proposed improvements and realignments would incorporate natural materials, tones, and design techniques to the maximum extent feasible while addressing trail network accessibility standards. Lastly, the proposed trail improvements and habitat restoration will not change or expand the use of the site. As such, the project is consistent with LU 9.4 Site #4.

OPEN SPACE ELEMENT

Policy OS 1: Lateral Shoreline Access [GP/CP]

Objective: *To provide for the creation of continuous public lateral beach and bluff-top access along the entire Goleta shoreline and increase and enhance opportunities for enjoyment of beach, shoreline, and bluff-top areas, consistent with the natural shoreline character, private property rights, and public safety.*

OS 1.3 Preservation of Existing Coastal Access and Recreation. [GP/CP] Goleta’s limited Pacific shoreline of approximately two miles provides a treasured and scarce recreational resource for residents of the city, region, and state. Existing public beaches, shoreline, parklands, trails, and coastal access facilities shall be protected and preserved and shall be expanded or enhanced where feasible (see related Policies LU 9 and OS 4).

Consistent: The Project is proposing to enhance the existing trail system (i.e. existing coastal access) located in the Santa Barbara Shores Park and Sperling Preserve Parcels (Open Space/Passive Recreation). The proposed trail improvements, improved Beach Access Points E and F, and habitat restoration will not change or expand the use of the site, nor create entirely new trails or access points. As such, the project is consistent with OS 1.3.

OS 1.10 Management of Public Lateral Access Areas. [GP/CP] The following criteria and standards shall apply to use and management of lateral shoreline access areas:

- a. Private commercial uses of public beach areas shall be limited to coastal dependent recreational uses, including but not limited to surfing schools, ocean kayaking, and similar uses. All commercial uses of beach areas and other lateral accessways shall be subject to approval of a permit by the City. The number, size, duration, and other characteristics of commercial uses of beach areas may be limited in order to preserve opportunities for use and enjoyment of the beach area by the general public. For-profit commercial uses at the City-owned Santa Barbara Shores Park and Sperling Preserve (the Ellwood-Devereux Open Space and Habitat Management Plan [OSHMP] area) are prohibited (see related Policy OS 5).

- b. Temporary special events shall minimize impacts to public access and recreation along the shoreline. Coastal Development Permits shall be required for any temporary event that proposes to use a sandy beach area and involves a charge for admission or participation.
- c. Where sensitive habitat resources are present, limited or controlled methods of access and/or mitigation designed to eliminate or reduce impacts to ESHAs shall be implemented.
- d. Lateral beach accessways shall be sited, designed, managed to avoid and/or protect marine mammal hauling grounds, seabird and shorebird nesting and roosting sites, sensitive rocky points and intertidal areas, and coastal dunes.
- e. New public beach facilities shall be limited to only those structures that provide or enhance public access and recreation activities. No structures shall be permitted on sandy beach areas.
- f. All lateral shoreline access and recreation improvements shall be designed to minimize any adverse impacts to visual resources and shall be compatible with maintenance of a natural appearance.
- g. Signs shall be designed to minimize impacts to scenic coastal resources and shall be limited to trail markers and regulatory and interpretative signs. Commercial signs are prohibited.

Consistent: The Project is proposing to enhance the existing trail system (i.e. existing coastal access) located in the Santa Barbara Shores Park and Sperling Preserve Parcels (Open Space/Passive Recreation). The proposed trail improvements and enhancements to Beach Access Points E and F will not change or expand the use of the site, nor create entirely new trails or access points. Lastly, the Project is not proposing any new lateral access or beach access and related signage. Further, the implementation of this Project will assist the City in its efforts in continued management of existing public lateral access areas. As such, the project is consistent with OS 1.10.

Policy OS 2: Vertical Access to the Shoreline [GP/CP]

Objective: *To provide for expanded and enhanced public vertical access to Goleta's shoreline by preserving existing accessways and establishing new vertical access opportunities at key locations so as to increase opportunities for public enjoyment of beach, bluff-top, and other shoreline areas, consistent with the natural shoreline character, private property rights, and public safety.*

OS 2.3 Preservation of Existing Vertical Accessways. [GP/CP] Vertical access to Goleta's Pacific shoreline was limited to two locations as of 2005. These include access to Haskell's Beach within the Bacara Resort property and access at the City-owned Santa Barbara Shores Park and Sperling Preserve properties. The latter includes numerous trails that provide access to the bluff tops, although access from the bluff top to Ellwood Beach is available at only two locations. Existing public vertical coastal access facilities shall be protected and preserved and shall be expanded or enhanced where feasible (see related Policies LU 9 and OS 4).

Consistent: The Project is proposing to enhance the existing trail system (i.e. existing coastal access) located in the Santa Barbara Shores Park and Sperling Preserve Parcels (Open Space/Passive Recreation). The proposed enhancements to Beach

Access Points E and F will not change or expand the use of the site, nor create entirely new trails or access points. As such, the project is consistent with OS 2.3.

OS 2.8 Management of Vertical Accessways. [GP/CP] The following standards shall apply to management of vertical accessways:

- a. Where sensitive habitat resources are present, limited or controlled methods of access and/or mitigation designed to eliminate or reduce impacts to ESHAs shall be required.
- b. The hours during which vertical coastal access areas are available for public use shall be the maximum feasible while maintaining compatibility with nearby neighborhoods and land uses. The hours for public use shall be set forth in each individual coastal development permit. Unless specific hours are described within a permit, the access shall be deemed to be 24 hours per day, 7 days per week.
- c. In order to maximize public use and enjoyment, user fees for access to vertical beach and shoreline areas shall be prohibited. Activities and/or uses that would deter or obstruct public vertical access shall be prohibited.
- d. Private for-profit commercial use of vertical accessways shall be prohibited.
- e. Camping or other use of vertical accessways for overnight accommodations shall be prohibited.
- f. Motorized vehicles shall be prohibited on vertical accessways.

Consistent: The Project is proposing to enhance the existing trail system (i.e. existing coastal access) located in the Santa Barbara Shores Park and Sperling Preserve Parcels (Open Space/Passive Recreation). The proposed trail improvements and enhancements to Beach Access Points E and F will not change or expand the use of the site, nor create entirely new trails or access points. Lastly, the Project is not proposing any new vertical access and related signage. Further, the implementation of this Project will assist the City in its efforts in continued management of existing public vertical access areas. As such, the project is consistent with OS 2.8.

Policy OS 3: Coastal Access Routes, Parking, and Signage [GP/CP]

Objective: *To provide an adequate supply of public coastal access parking in lots or areas that are appropriately distributed along Goleta's shoreline with convenient and linkages to regional transportation routes.*

OS 3.2 Coastal Access Parking. [GP/CP] Adequate public parking shall be provided and maintained to serve coastal access and recreation uses to the extent feasible. The following criteria and standards shall apply:

- a. Existing and planned public coastal access parking areas are shown on Figure 3-1.
- b. Existing public parking areas serving coastal recreation users shall not be displaced unless a comparable replacement parking area is provided.
- c. New development shall be required to provide offstreet parking sufficient to serve the proposed uses in order to minimize impacts to public onstreet parking available for coastal access and recreation.
- d. New or expanded nonresidential development that may individually or cumulatively impact public shoreline access and recreation shall include parking areas that are

designed to serve beach access during weekends as well the proposed uses on weekdays. In addition, vehicular access to the shoreline with a drop-off point for marine recreation equipment shall be required in appropriate locations, as shown on the map in Figure 3-1.

Consistent: Mobile heavy construction equipment (e.g., small tractor, pick-up truck, and small roller compactor) would enter and exit the Ellwood Open Space via Santa Barbara Shores Drive; however, the trail construction crew would park at the Sperling Parking Lot. Construction equipment would be staged on the existing trail segments or immediately adjacent within disturbed or unvegetated areas. At the beach access points, construction equipment would be staged in flat areas adjacent to the trail characterized by disturbed vegetation. All construction equipment would be removed at the end of the day and stored in the haul truck or at a designated area with appropriate signage in the Sperling Parking Lot. Overnight equipment storage areas would be fenced. As the Project is not expanding the use of the Ellwood Mesa Open Space, no additional parking is needed. As such, the project is consistent with OS 3.2.

Policy OS 4: Trails and Bikeways [GP/CP]

Objective: *To designate, preserve, and expand a public trail system that will provide recreation opportunities for multiple types of users in diverse and attractive environmental settings and that will connect various parks and neighborhoods with the regional trail network and to Los Padres National Forest.*

OS 4.2 Adoption of Trail Plan Map. [GP/CP] The overall trail system plan, shown in Figure 3-2, is hereby adopted. The Trail Plan map identifies the city's existing and proposed trail segments, which are intended to provide diverse recreational and aesthetic experiences serving the entire community, achieve connections to parks and major recreational facilities, link with trail systems of adjacent jurisdictions, and facilitate recreational corridors between the Santa Ynez Mountains (Los Padres National Forest) and the coast. The alignments for proposed trail segments are conceptual only. Sidewalks and bikeways are intended to be connecting links to or between trails. The Pedestrian System Plan Map and the Bikeways Plan Map are Figures 7-5 and 7-6 in the Transportation Element.

OS 4.3 California Coastal Trail. [GP/CP] The California Coastal Trail segment within Goleta, as shown on the maps in Figures 3-1 and 3-3, shall be planned as a part of a continuous lateral shoreline trail system traversing the entire length of the state's coastline, connecting with contiguous California Coastal Trail segments within the jurisdictions of the County and UCSB. The following criteria and standards shall apply to the California Coastal Trail:

- a. The trail shall be sited as close to the ocean as possible, while maintaining an appropriate setback for safety purposes from the edge of the coastal bluff.
- b. The trail shall be connected at appropriate intervals to existing and proposed local trail systems and to vertical access facilities.
- c. The trail shall be sited to maximize ocean views and scenic coastal vistas.

- d. The trail shall be planned primarily as a pedestrian trail, although certain segments, particularly within the City-owned Ellwood-Devereux Open Space Area, may be planned to accommodate the needs of bicyclists and/or equestrians.
- e. Segments of the trail located along the beach and shoreline that may not be passable at all times shall, where feasible, have an alternate landward or bluff-top route that will allow continuous passage during all seasons and tide conditions.
- f. The trail shall be sited and designed to minimize impacts to environmentally sensitive habitat areas to the extent feasible. The trail surface shall generally be limited to groomed and/or compacted native soil or sand material, except that segments intended for handicapped access or to beach overlooks (vista points) may be improved to a higher standard.
- g. Trail easement dedication and installation of trail improvements shall be required as a condition of approval of all coastal development permits on properties located on the California Coastal Trail corridor, when dedication will mitigate impacts by the project on public access and/or recreation.

OS 4.4 Juan Bautista de Anza National Historic Trail. [GP/CP] The following criteria and standards apply to future improvements to the Anza Trail segment within Goleta:

- a. The planned corridor for the Anza Trail is shown on the maps in Figures 3-1 and 3-3.
- b. Within the City-owned Sperling Preserve and Santa Barbara Shores Park, the Anza Trail shall be planned for multiple user types, including pedestrians, bicyclists, and equestrians, as shown on the map in Figure 3-3.
- c. Within the City-owned open space property the Anza Trail shall generally be designed as follows:
 - 1) The equestrian path or tread may be separate from or combined with the main trail tread for pedestrians and bicyclists.
 - 2) The trail shall be designed to have the minimum width necessary to accommodate the multiple users. The surface may be native soil materials or imported compacted fines (such as decomposed granite) without stabilizer or binder.
- d. As it exits the public open space area, the future Anza Trail corridor extends along Hollister Avenue to the Bacara access road and along that road to the city's western boundary. Standards for improvements of this segment of the Anza Trail shall be flexible to respond to the amount of available space for trail improvements. Dedication of a public access easement for the trail shall be required as a condition of approval of all coastal development permits for properties located along the Anza Trail corridor.
- e. Connectivity of the Anza Trail in Goleta with segments within the jurisdictions of the County and UCSB shall be provided as indicated in the multi-jurisdictional Ellwood-Devereux OSHMP.

OS 4.5 Creekside Trails. [GP] Trails shall be sited to minimize damage to riparian areas while allowing some public access. To the extent feasible, trail corridors should be located outside riparian areas but provide occasional contact to streams to allow public access and enjoyment of the resources. Where feasible, public trail easements should be located within the boundaries of flood control easements. All trail construction should minimize removal of riparian vegetation and utilize natural features and/or lateral

fencing to discourage public access to streamside areas not directly within the trail alignment. Any fences constructed along trail corridors should allow for wildlife movement. Where necessary to prevent disturbance of nesting birds, sections of trails may be closed on a seasonal basis. At such times, alternative trail segments should be provided, where feasible. In order to protect riparian resources, the number of creek crossings should be limited and maintenance should be conducted to minimize introduction and spread of invasive plants.

Consistent: The Project is proposing to enhance the existing trail system (i.e. existing coastal access) known as the “California Coastal Trail” and the “Juan Baustista de Anza National Historical Trail” located in the Ellwood Mesa Open Space. The proposed trail improvements and enhancements to Beach Access Points E and F will not change or expand the use of the site, nor create entirely new trails or access points. Lastly, the Project is not proposing any new lateral or vertical access and related signage. Further, the implementation of this Project will assist the City in its efforts in continued management of existing public vertical access areas. As such, the project is consistent with OS 4.2, 4.3, and 4.4.

Policy OS 5: Ellwood-Devereux Open Space Area [GP/CP]

Objective: *The portion of the Ellwood-Devereux Open Space Area within Goleta, which includes the City-owned Sperling Preserve and Santa Barbara Shores Park units, shall be managed to provide coastal access and passive, coastal-dependent recreational opportunities consistent with protection and enhancement of the site’s environmentally sensitive habitat areas and other environmental and scenic resources.*

OS 5.2 Adoption of Open Space and Habitat Management Plan Maps. [GP/CP] The Open Space and Habitat Management Plan maps in Figures 3-3 and 3-4, which respectively designate coastal access and recreation areas and environmentally sensitive habitat areas that are to be protected and/or enhanced, are hereby adopted.

OS 5.3 Public Access and Recreation. [GP/CP] The Ellwood-Devereux Open Space Area shall be managed to maintain the site’s historical public access and recreation uses while managing accessways to protect natural resources such as the monarch butterfly groves, vernal pools, native grasslands, beaches, coastal bluffs, and other environmentally sensitive habitat areas. The planned trail and beach access system, shown on the map in Figure 3-3, is based on the locations of existing informal trails created by repeated public use, with some trail segments being closed to avoid impacts to environmentally sensitive areas, to eliminate hazardous segments, and/or to eliminate parallel redundant trail segments. Although some trail closures are proposed, the planned trail system will not reduce overall access or trail experiences in the public open space area, but will redirect users to alternate routes located in close proximity. The following standards shall apply to public access and recreation in the open space area:

- a. The Anza Trail is one of two major planned east-west trails across the Ellwood Mesa. This trail extends from the eastern boundary with UCSB to the public access parking lot at Santa Barbara Shores Park adjacent to Hollister Avenue (see related OS 4.4).

- b. The California Coastal Trail segment within the Ellwood-Devereux Open Space Area, the other major east-west trail, is planned to have a bluff-top alignment (see related OS 4.3).
- c. The locations of additional planned trails are also shown on Figure 3-3. Although the trail system shall be planned primarily as footpaths for pedestrians, bicyclists and/or equestrians may also be accommodated on certain trail segments as shown in Figure 3-3. At least one trail from the Hollister parking lot to the bluff-top shall be designated for exclusive use by pedestrians.
- d. Except for the Anza Trail, trails shall generally be designed to utilize native soil materials with appropriate grooming and maintenance to provide for slightly crowned cross sections, defined trail edges, and proper drainage. Trail improvements shall be designed to maintain natural drainage patterns in order to avoid potential impacts to Devereux Creek and the associated eucalyptus groves that comprise the monarch butterfly aggregation sites. Trail improvements may include boardwalks and/or bridges across Devereux Creek in wet or eroded areas in the vicinity of the Ellwood Main grove.
- e. Two accessways from the bluff top to Ellwood Beach (identified as accessways E and F) are planned, as shown on Figure 3-3. These beach accessways shall be planned to accommodate pedestrians only.
 - 1) Improvements to accessway E, which is a steeply sloped former roadway with a badly eroded asphalt surface, are limited to repairs to improve the surface for the safety of users and to reduce further erosion of the bluff face and pathway.
 - 2) Improvements to accessway F, which is a steep pathway down the face of the bluff, shall be designed to smooth the surface, improve drainage, and reduce erosion of the path and bluff face and are generally limited to minor grading and placement of landscape ties or a similar material to stabilize the pathway.
- f. A public access parking lot consisting of not less than 40 parking spaces shall be provided adjacent to Hollister Avenue, as shown in Figure 3-3. The following standards shall apply to public parking serving the open space area:
 - 1) The Hollister Avenue lot shall be paved with permeable materials to reduce stormwater runoff and prevent pollution of surface waters.
 - 2) Landscaping of the parking lot and Hollister Avenue street frontage shall maintain a natural appearance and shall be limited to drought-tolerant species. Landscaping shall not impair views of the coastal bluff-top, ocean, and Channel Islands from Hollister Avenue.
 - 3) Onstreet parking on streets within the Ellwood neighborhood shall be available as needed for public coastal access, subject to appropriate restrictions on the hours of availability and duration of such parking.
- g. A limited amount of facilities or amenities may be provided within the open space area to better accommodate users and manage accessways to protect natural resources. These may include the following:
 - 1) A potential public restroom facility to be located between the public parking lot and Hollister Avenue, which shall be designed to avoid impairing views of the ocean and the Channel Islands from Hollister Avenue.
 - 2) Low-profile signs to identify permitted uses, guide pedestrians, interpret resources, and advise users on resource protection regulations.

- 3) Temporary or permanent barriers to establish protection for sensitive plants and animals and habitat restoration areas that are compatible with the natural appearance of the surroundings.
- 4) Benches at a limited number of selected scenic locations.
- 5) Trash receptacles, mutt-mitt dispensers, and other similar low-impact facilities.
- h. A signage program shall be prepared for the open space area. The overall intent or purposes of the sign program shall be to assist and inform visitors as to open space regulations, directions, and information. Signs shall be designed and located in a manner that is protective of environmental and visual resources and may include the following:
 - 1) A donor recognition sign.
 - 2) Trail markers identifying names, directions, and distances.
 - 3) Trail head signs.
 - 4) Interpretative signs.
 - 5) Regulatory signs, including trail and open space rules, closures, and hazardous areas.
 - 6) Habitat protection signs.

OS 5.4 Protection and Enhancement of Habitat Areas. [GP/CP] Within its boundaries, the Ellwood-Devereux Open Space Area encompasses a diverse array of sensitive aquatic and upland habitats, as shown on Figure 3-3. These habitats include beach and shoreline areas, dunes, rocky intertidal areas, coastal bluffs, monarch butterfly aggregation sites and associated eucalyptus groves, vernal pools, riparian areas along Devereux Creek and its tributaries, coastal sage and scrub areas, native grasslands, and raptor nesting and roosting areas. All environmentally sensitive habitat areas shall be managed and protected consistent with the policies and standards described in the Conservation Element of this plan. In addition, the following criteria and standards shall apply to the Ellwood-Devereux Open Space Area:

- a. Habitat management on City owned lands shall be implemented within a broad ecosystem context in which habitat management priorities will consider the role of the targeted habitats and the interrelationships with other habitats in the open space area. In addition to protection of existing habitats, management actions may include interventions to enhance or restore degraded habitat conditions. All management activities shall use an adaptive approach that includes monitoring and adjustments to ensure that self-sustaining habitats will be created that are not reliant on long-term human intervention.
- b. Priority habitat management activities include ensuring the long-term vitality of the eucalyptus groves and stability in the monarch butterfly population; restoration of native grasslands; enhancement of vernal pools and riparian habitats; and protection of special status species, including various raptors and the western snowy plover. Some examples of habitat management action areas are shown on Figure 3-4.
- c. Habitat management activities shall be designed to accommodate public access and use in or adjacent to habitat areas, where practicable, in a manner consistent with protection of the resource.
- d. In all habitat enhancement or restoration projects, genetic stock for seeds and plants from the Devereux Creek watershed shall be used, unless such use has been determined to be infeasible.

OS 5.5 Use and Management of the Open Space Area. [GP/CP] The following management policies shall apply to lands owned by the City within the Ellwood-Devereux Open Space area:

- a. An advisory committee may be established to provide advice and recommendations to the City regarding management of access, recreation uses, and habitat within the area. The committee may include residents of the adjacent neighborhoods as well as technical experts.
- b. Permitted uses include, but are not limited to, the following compatible passive and coastal-dependent recreation activities: hiking, bicycling on designated trails, horseback riding on designated trails, bird-watching, surfing, sunbathing and beach play, surf fishing as allowed by law, swimming, scuba diving and snorkeling, kayaking, picnicking, playing of nonamplified musical instruments, kite flying, small educational tours, habitat restoration, scientific studies, and other uses as deemed appropriate by the City. Particular uses may require advance approval of a permit by the City.
- c. Prohibited uses include, but are not necessarily limited to, the following: fireworks; camping; plant or wildlife collecting unless approved by the City; amplified music; radio-controlled motorized equipment such as model airplanes and cars; organized competitive sporting events such as track and field and bicycle races; large-scale special events and public gatherings; model rockets; fires of any kind, including in pits or in camp stoves; and archery, BB guns, pellet guns, paint guns, and firearms of all types.
- d. All private for-profit commercial uses of the City-owned portion of the Ellwood-Devereux Open Space Area shall be prohibited, including but not limited to commercial equestrian operations.
- e. Beach grooming using mechanical equipment shall be prohibited.
- f. Any group activity that causes damage to vegetation or soil outside of designated trails shall be prohibited.
- g. Use of herbicides, insecticides, and similar toxic substances shall not be permitted unless other nonchemical methods of pest control have been attempted or determined to be infeasible.

OS 5.6 Multi-jurisdictional Open Space Area. [GP/CP] The Ellwood-Devereux Open Space area within Goleta is a part of a planned contiguous open space area of over 650 acres along or near the Pacific shoreline. This larger multi-jurisdictional open space area includes lands managed by the Land Trust for Santa Barbara County, UCSB, and the County of Santa Barbara. The City intends to cooperate with the Land Trust of Santa Barbara County, UCSB, and the County of Santa Barbara in assuring connectivity of trails and in formulating and implementing habitat management strategies where such management activities have effects that extend beyond the boundaries of individual jurisdictions.

Consistent: The Project is proposing to enhance the existing trail system (i.e. existing coastal access) known as the “California Coastal Trail” and the “Juan Baustista de Anza National Historical Trail” located in the Ellwood Mesa Open Space. Habitat restoration is proposed for approximately 13 acres adjacent to the trail and coastal blufftop as envisioned and planned for in the 2004 Ellwood-Devereux Coast Open Space and

Habitat Management Plan (Open Space Plan). Implementation of the proposed Project would be consistent with the Ellwood-Devereux Coast Open Space and Habitat Management Plan and would not conflict with any other adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plan. As such, the project is consistent with OS 5.2, 5.3, 5.4, 5.5, and 5.6.

Policy OS 6: Public Park System Plan [GP]

Objective: *To develop a well-maintained, interconnected system of multi-functional parks, recreation facilities and public open spaces that will meet the needs of existing and future residents and employees and that are attractive, safe, and accessible to all segments of the city's population, and supportive of established neighborhoods.*

OS 6.7 Regional Open Space. [GP] Regional open space areas are contiguous to or encompass significant natural resources and may include areas of historical, environmental, or ecological value. These areas may contain special amenities or features that attract people from throughout the city and the surrounding region. The following standards apply to regional open space areas:

- a. The typical service area shall be within a 0.5- to 1.0-hour drive.
- b. The typical size shall be appropriate for the protection of the associated natural or open space values.
- c. Regional open spaces should be easily accessible from the surrounding neighborhoods and easily accessible by automobile for visitors from more distant locations. Since these areas may attract people from distant locations, they may provide on-site parking and restroom facilities. Such services should be located on the periphery of the open space area and designed in a way to minimize any adverse impact on natural and visual resources. The capacity of such parking and restroom facilities shall be consistent with the character and carrying capacity of the open space area.
- d. Typical facilities provided in regional open space areas are designed to be primarily passive in character, although historical and special purpose attractions may be included. The primary purpose of these areas is to protect their open space and natural values and passive recreation shall be managed in a way that does not conflict with these values, while still providing appropriate public access.

Consistent: The Project is located in Ellwood Mesa and designated regional open space due to its size and passive use. The proposed trail improvements and enhancements to Beach Access Points E and F will not change or expand the use of the site. The Project will not change or alter accessibility to the site. As such, the project is consistent with OS 6.7.

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

Objective: *To designate, preserve, and protect significant open space resources including agricultural, ecological, recreational, and scenic lands in Goleta and surrounding areas for current and future generations.*

OS 7.2 Adoption of Open Space Plan Map. [GP] Figure 3-5 designates land areas in Goleta that are planned for preservation as public and private open space.

OS 7.3 Open Space for Preservation of Natural Resources. [GP] Goleta's natural resource lands include sandy beaches and dunes; rocky intertidal areas; coastal lagoons; coastal bluffs; eucalyptus groves and monarch butterfly aggregation sites; native grasslands; streams and associated riparian areas; wetlands, lakes, and ponds; and habitats for various protected plant and animal species. Figure 3-5 designates all ESHAs as protected open space. The following standards shall apply to these areas:

- a. The designated natural resource areas shall be managed by the City in accord with the policies described in the Conservation Element.
- b. The City may require dedication of open space easements as a condition of approval of development on sites that have open space resources as shown in Figure 3-5.
- c. The City encourages the donation of easements or fee-simple interests in open space lands to the City or other appropriate nonprofit entity, such as a land trust.

Consistent: The Project is located in Ellwood Mesa and designated Open Space in the Open Space Plan Map (GP, Figure 3-5). The proposed trail improvements and enhancements to Beach Access Points E and F will not change or expand the use of the site. Habitat restoration is proposed for approximately 13 acres adjacent to the trail and coastal blufftop as envisioned and planned for in the 2004 Ellwood-Devereux Coast Open Space and Habitat Management Plan (Open Space Plan). Implementation of the proposed Project would be consistent with the Ellwood-Devereux Coast Open Space and Habitat Management Plan and would not conflict with any other adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plan. As such, the project is consistent with OS 7.2 and 7.3.

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

Objective: *To identify and protect prehistoric and historic cultural sites and resources from destruction or harmful alteration.*

OS 8.3 Preservation. [GP/CP] The City shall protect and preserve cultural resources from destruction. The preferred method for preserving a recorded archeological site shall be by preservation in place to maintain the relationship between the artifacts and the archaeological context. Preservation in place may be accomplished by deed restriction as a permanent conservation easement, avoidance through site planning and design, or incorporation of sites into other open spaces to prevent any future development or use that might otherwise adversely impact these resources.

OS 8.4 Evaluation of Significance. [GP/CP] For any development proposal identified as being located in an area of archaeological sensitivity, a Phase I cultural resources inventory shall be conducted by a professional archaeologist or other qualified expert. All sites determined through a Phase 1 investigation to potentially include cultural resources must undergo subsurface investigation to determine the extent, integrity, and significance of the site. Where Native American artifacts have been found or where oral

traditions indicate the site was used by Native Americans in the past, research shall be conducted to determine the extent of the archaeological significance of the site.

OS 8.5 Mitigation. [GP/CP] If research and surface reconnaissance shows that the project area contains a resource of cultural significance that would be adversely impacted by proposed development and avoidance is infeasible, mitigation measures sensitive to the cultural beliefs of the affected population shall be required. Reasonable efforts to leave these resources in an undisturbed state through capping or covering resources with a soil layer prior to development shall be required. If data recovery through excavation is the only feasible mitigation, the City shall confer with the affected Native American nation or most-likely descendants, as well as agencies charged with the responsibility of preserving these resources and organizations having a professional or cultural interest, prior to the removal and disposition of any artifacts.

OS 8.6 Monitoring and Discovery. [GP/CP] On-site monitoring by a qualified archaeologist and appropriate Native American observer shall be required for all grading, excavation, and site preparation that involves earth moving operations on sites identified as archaeologically sensitive. If cultural resources of potential importance are uncovered during construction, the following shall occur:

- a. The grading or excavation shall cease and the City shall be notified.
- b. A qualified archeologist shall prepare a report assessing the significance of the find and provide recommendations regarding appropriate disposition.
- c. Disposition will be determined by the City in conjunction with the affected Native American nation.

OS 8.7 Protection of Paleontological Resources. [GP/CP] Should substantial paleontological resources be encountered during construction activities, all work that could further disturb the find shall be stopped and the City of Goleta shall be notified within 24 hours. The applicant shall retain a qualified consultant to prepare a report to the City that evaluates the significance of the find and, if warranted, identifies recovery measures. Upon review and approval of the report by the City, construction may continue after implementation of any identified recovery measures.

Consistent: The proposed Project would include minor ground disturbing activities (e.g., planting) over approximately 13 acres, including approximately 900 cubic yards of cut from the identified borrow sites, recontouring within the trail corridor, and planting associated with restoration activity. No significant historical, archaeological, or paleontological resources are known to occur within these areas of ground disturbances/excavations. Additionally, the proposed borrow sites have been previously disturbed by historic land use. Therefore, Project construction is not expected to adversely impact cultural resources including prehistoric or historic artifacts. However, given the historical presence of Chumash in the Santa Barbara area, there is a possibility for unknown resources to be encountered onsite during improvements. Potentially significant impacts to archaeological, paleontological, and historical resources could result. Mitigation measures, MM CR-1 and MM CR-2, which require a Cultural Resources Monitoring Plan and establish a protocol for the handling of human remains, would ensure that impacts would be less than significant. As such, the project is consistent with OS 8.3, 8.4, 8.5, 8.6, and 8.7.

CONSERVATION ELEMENT

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

Objective: *To identify, preserve, and protect the city's natural heritage by preventing disturbance of ESHAs.*

CE 1.6 Protection of ESHAs. [GP/CP] ESHAs shall be protected against significant disruption of habitat values, and only uses or development dependent on and compatible with maintaining such resources shall be allowed within ESHAs or their buffers. The following shall apply:

- a. No development, except as otherwise allowed by this element, shall be allowed within ESHAs and/or ESHA buffers.
- b. A setback or buffer separating all permitted development from an adjacent ESHA shall be required and shall have a minimum width as set forth in subsequent policies of this element. The purpose of such setbacks shall be to prevent any degradation of the ecological functions provided by the habitat area.
- c. Public accessways and trails are considered resource-dependent uses and may be located within or adjacent to ESHAs. These uses shall be sited to avoid or minimize impacts on the resource to the maximum extent feasible. Measures— such as signage, placement of boardwalks, and limited fencing or other barriers—shall be implemented as necessary to protect ESHAs.
- d. The following uses and development may be allowed in ESHAs or ESHA buffers only where there are no feasible, less environmentally damaging alternatives and will be subject to requirements for mitigation measures to avoid or lessen impacts to the maximum extent feasible: 1) public road crossings, 2) utility lines, 3) resource restoration and enhancement projects, 4) nature education, 5) biological research, and 6) Public Works projects as identified in the Capital Improvement Plan, only where there are no feasible, less environmentally damaging alternatives.
- e. If the provisions herein would result in any legal parcel created prior to the date of this plan being made unusable in its entirety for any purpose allowed by the land use plan, exceptions to the foregoing may be made to allow a reasonable economic use of the parcel. Alternatively, the City may establish a program to allow transfer of development rights for such parcels to receiving parcels that have areas suitable for and are designated on the Land Use Plan map for the appropriate type of use and development. *(Amended by Reso. 09-59, 11/17/09)*

CE 1.10 Management of ESHAs. [GP/CP] The following standards shall apply to the ongoing management of ESHAs:

- a. The use of insecticides, herbicides, artificial fertilizers, or other toxic chemical substances that have the potential to degrade ESHAs shall be prohibited within and adjacent to such areas, except where necessary to protect or enhance the ESHA itself.

- b. The use of insecticides, herbicides, or other toxic substances by City employees and contractors in construction and maintenance of City facilities and open space lands shall be minimized.
- c. Mosquito abatement within or adjacent to ESHAs shall be limited to the implementation of the minimum measures necessary to protect human health and shall be undertaken in a manner that minimizes adverse impacts to the ESHAs.
- d. Weed abatement and brush-clearing activities for fire safety purposes shall be the minimum that is necessary to accomplish the intended purpose. Techniques shall be limited to mowing and other low-impact methods such as hand crews for brushing, tarping, and hot water/foam for weed control. Disking shall be prohibited.
- e. Where there are feasible alternatives, existing sewer lines and other utilities that are located within an ESHA shall be taken out of service, abandoned in place, and replaced by facilities located outside the ESHA to avoid degradation of the ESHA resources, which could be caused by pipeline rupture or leakage and by routine maintenance practices such as clearing of vegetation.
- f. Removal of nonnative invasive plant species within ESHAs may be allowed and encouraged, unless the nonnatives contribute to habitat values.
- g. The following flood management activities may be allowed in creek and creek protection areas: desilting, obstruction clearance, minor vegetation removal, and similar flood management methods.

Consistent: The Project would provide habitat restoration along the trail corridors and adjacent Environmentally Sensitive Habitat Areas (ESHAs). Specifically, the Project proposes removal of non-native plant species, including mustard, fennel, iceplant (*Carpobrotus edulis*) and Harding grass, along the trail corridors of the Coastal and Anza trails, the borrow pits, and the entire length of the bluffs on the ocean side. These areas would be replanted with appropriate native species to improve the ESHAs designated in the Ellwood Mesa Open Space Plan Area. Additionally, the proposed Project would restore ESHA in the vicinity of the Drainage A and Devereux Creek crossings, leading to a substantial net increase in native wetland habitat in these drainages. As such, the project is consistent with CE 1.6 and 1.10.

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

Objective: *Enhance, maintain, and restore the biological integrity of creek courses and their associated wetlands and riparian habitats as important natural features of Goleta's landscape.*

CE 2.2 Streamside Protection Areas. [GP/CP] A streamside protection area (SPA) is hereby established along both sides of the creeks identified in Figure 4-1. The purpose of the designation shall be to preserve the SPA in a natural state in order to protect the associated riparian habitats and ecosystems. The SPA shall include the creek channel, wetlands and/or riparian vegetation related to the creek hydrology, and an adjacent upland buffer area. The width of the SPA upland buffer shall be as follows:

- a. The SPA upland buffer shall be 100 feet outward on both sides of the creek, measured from the top of the bank or the outer limit of wetlands and/or riparian vegetation, whichever is greater. The City may consider increasing or decreasing the width of the SPA upland buffer on a case-by-case basis at the time of environmental

review. The City may allow portions of a SPA upland buffer to be less than 100 feet wide, but not less than 25 feet wide, based on a site specific assessment if (1) there is no feasible alternative siting for development that will avoid the SPA upland buffer; and (2) the project's impacts will not have significant adverse effects on streamside vegetation or the biotic quality of the stream.

- b. If the provisions above would result in any legal parcel created prior to the date of this plan being made unusable in its entirety for any purpose allowed by the land use plan, exceptions to the foregoing may be made to allow a reasonable economic use of the parcel, subject to approval of a conditional use permit. *(Amended by Reso. 09-30, 5/19/09 and Reso. 09-59, 11/17/09)*

CE 2.3 Allowable Uses and Activities in Streamside Protection Areas. [GP/CP] The following compatible land uses and activities may be allowed in SPAs, subject to all other policies of this plan, including those requiring avoidance or mitigation of impacts:

- a. Agricultural operations provided they are compatible with preservation of riparian resources.
- b. Fencing and other access barriers along property boundaries and along SPA boundaries.
- c. Maintenance of existing roads, driveways, utilities, structures, and drainage improvements.
- d. Construction of public road crossings and utilities provided that there is no feasible, less environmentally damaging alternative.
- e. Construction and maintenance of foot trails, bicycle paths, and similar low-impact facilities for public access.
- f. Resource restoration or enhancement projects.
- g. Nature education and research activities.
- h. Low-impact interpretive and public access signage.
- i. Other such Public Works projects as identified in the Capital Improvement Plan, only where there are no feasible, less environmentally damaging alternatives. *(Amended by Reso. 09-59, 11/17/09)*

CE 2.5 Maintenance of Creeks as Natural Drainage Systems. [GP/CP] Creek banks, creek channels, and associated riparian areas shall be maintained or restored to their natural condition wherever such conditions or opportunities exist. Creeks carry a significant amount of Goleta's stormwater flows. The following standards shall apply:

- a. The capacity of natural drainage courses shall not be diminished by development or other activities.
- b. Drainage controls and improvements shall be accomplished with the minimum vegetation removal and disruption of the creek and riparian ecosystem that is necessary to accomplish the drainage objective.
- c. Measures to stabilize creek banks, improve flow capacity, and reduce flooding are allowed but shall not include installation of new concrete channels, culverts, or pipes except at street crossings, unless it is demonstrated that there is no feasible alternative for improving capacity.
- d. Drainage controls in new development shall be required to minimize erosion, sedimentation, and flood impacts to creeks. Onsite treatment of stormwater through

retention basins, infiltration, vegetated swales, and other best management practices (BMPs) shall be required in order to protect water quality and the biological functions of creek ecosystems.

- e. Alteration of creeks for the purpose of road or driveway crossings shall be prohibited except where the alteration is not substantial and there is no other feasible alternative to provide access to new development on an existing legal parcel. Creek crossings shall be accomplished by bridging and shall be designed to allow the passage of fish and wildlife. Bridge abutments or piers shall be located outside creek beds and banks, unless an environmentally superior alternative exists. *(Amended by Reso. 09-59, 11/17/09)*

CE 2.6 Restoration of Degraded Creeks. [GP/CP] Segments of several creeks in Goleta have been covered or channelized by concrete culverts, causing degradation of the creek ecosystem. Restoration activities for improving degraded creek resources shall include the following:

- a. Channelized creek segments and culverts shall be evaluated and removed to restore natural channel bed and bank, where feasible.
- b. Creek courses in public rights-of-way shall be uncovered as part of public works improvement projects.
- c. Barriers that prevent migration of fish such as anadromous salmonids from reaching their critical habitat shall be removed or modified.
- d. Restoration of native riparian vegetation and removal of exotic plant species shall be implemented, unless such plants provide critical habitat for monarch butterflies, raptors, or other protected animals.
- e. Creek rehabilitation projects shall be designed to maintain or improve flow capacity, trap sediments and other pollutants that decrease water quality, minimize channel erosion, prevent new sources of pollutants from entering the creek, and enhance in-creek and riparian habitat.
- f. The use of closed-pipe drainage systems for fish-bearing creeks shall be prohibited unless there is no feasible, less environmentally damaging alternative. When the use of culverts is necessary, the culverts shall be oversized and have gravel bottoms that maintain the channel's width and grade.

Consistent: The Project area is traversed by Devereux Creek, which is included on the Clean Water Act Section 303(d) list of impaired waters (SWRCB 2010). During construction-related activities, particularly those associated with the construction of the drainage crossings, implementation of the proposed Project would result in exposed sediments that may erode during storm events causing localized siltation and sedimentation of Devereux Creek. However, this impact would not result in violations of any water quality standards and would be less than significant with the incorporation of MM WAT-1, -2, -3, and -4, which would require a storm water permit as well as a Notice of Intent, SWPPP, and a Notice of Termination. Additionally, there would be no wastewater generated as a result of the proposed Project and over the long-term, erosion and associated water quality impacts would be reduced as a result of improvements to the trail system on Ellwood Mesa. Implementation of the proposed Project would not result in any alteration to the course of Devereux Creek or its tributaries as proposed trail recontouring and construction would be consistent with

GP/CLUP Policy OS 5.3(d). However, an 18-inch diameter culvert would be constructed within Gully A, north of Devereux Creek. there would be no substantial long-term increase in the rate or amount of erosion or surface water runoff which would result in flooding of Devereux Creek or its tributaries on- or off-site. Additionally, Drainage A and Devereux Creek would be spanned by boardwalk style crossings that would have beneficial impacts on wetland habitat and drainage (refer to Biological Resources). Consequently, these impacts would be less than significant. As such, the project is consistent with CE 2.2, 2.3, 2.5, and 2.6.

Policy CE 3: Protection of Wetlands [GP/CP]

Objective: *To preserve, protect, and enhance the functions and values of Goleta's wetlands.*

CE 3.4 Protection of Wetlands in the Coastal Zone. [CP] The biological productivity and the quality of wetlands shall be protected and, where feasible, restored in accordance with the federal and state regulations and policies that apply to wetlands within the Coastal Zone. Only uses permitted by the regulating agencies shall be allowed within wetlands. The filling, diking, or dredging of open coastal waters, wetlands, estuaries, and lakes is prohibited unless it can be demonstrated that:

- a. There is no feasible, environmentally less damaging alternative to wetland fill.
- b. The extent of the fill is the least amount necessary to allow development of the permitted use.
- c. Mitigation measures have been provided to minimize adverse environmental effects.
- d. The purposes of the fill are limited to: incidental public services, such as burying cables or pipes; restoration of wetlands; and nature study, education, or similar resource-dependent activities.

A wetland buffer of a sufficient size to ensure the biological integrity and preservation of the wetland shall be required. Generally the required buffer shall be 100 feet, but in no case shall wetland buffers be less than 50 feet. The buffer size should take into consideration the type and size of the development, the sensitivity of the wetland resources to detrimental edge effects of the development to the resources, natural features such as topography, the functions and values of the wetland, and the need for upland transitional habitat. A 100-foot minimum buffer area shall not be reduced when it serves the functions and values of slowing and absorbing flood waters for flood and erosion control, sediment filtration, water purification, and ground water recharge. The buffer area shall serve as transitional habitat with native vegetation and shall provide physical barriers to human intrusion. *(Amended by Reso. 09-59, 11/17/09)*

Consistent: Implementation of the proposed Project would include the construction of boardwalk style crossings over Drainage A and Devereux Creek as well as the installation of an 18-inch concrete culvert in Gully A. Gully A is not considered a jurisdictional wetland (AMEC 2013 [unpublished]); however, Drainage A and Devereux Creek have been delineated as jurisdictional wetlands (City of Goleta 2004; AMEC 2013 [unpublished]). Construction of a boardwalk style bridge over each of these drainages would result in approximately 0.01 acres of indirect impacts to wetland habitat in Drainage A and 0.05 acres of indirect and direct impacts to wetland impact in Devereux

Creek. However, restoration efforts within these areas would restore approximately 0.05 acres of wetland habitat in Drainage A and 0.19 acres of wetland habitat in Devereux Creek. Further, the boardwalk bridges would reduce long-term disturbance of these habitats and a drainage analysis that was conducted for the proposed crossings demonstrated that the proposed boardwalk bridges would increase the drainage capacities of Drainage A and Devereux Creek. The proposed Project would also include the relocation of the existing Anza Trail around an existing vernal pool on the eastern end of the Project site as well as the restoration of this area. Potentially adverse impacts to these surface water bodies, including the vernal pools on Ellwood Mesa, may result from sedimentation during trail recontouring and construction as well as construction of the proposed improvements. However, these impacts would be reduced to less than significant levels with implementation of mitigation measures for impacts to Hydrology and Water Quality and Geology and Soils (MM WAT-1, -2, -3, and -4 as well as MM GEO-3), which would require a storm water permit, Stormwater Pollution Prevention Plan (SWPPP), Notice of Intent, and Notice of Termination as well as other related BMPs required by the City. Further, long-term impacts to biological resources associated with the proposed Project would be beneficial as the proposed Project would enhance southern vernal pool habitat, restore wetland habitat within jurisdiction wetlands, and remove segments of the shared Coastal-Anza Trail that pass through the high water marks of Drainage A and Devereux Creek. As such, the project is consistent with CE 3.4.

CE 3.8 Vernal Pool Protection. [GP/CP] Vernal pools, an especially rare wetland habitat on the south coast of Santa Barbara County, shall be preserved and protected. Vernal pools in Goleta, which are generally small in area and only a few inches deep, are found at scattered locations on the City-owned Ellwood Mesa and Santa Barbara Shores Park. These appear to be naturally formed and exhibit little or no evidence of altered hydrology. Trails on these two properties shall be sited and constructed in a manner that avoids impacts to vernal pool hydrology and that will allow restoration by removing several informal trail segments that bisect vernal pool habitats. Additional vernal pools are found at Lake Los Carneros Natural and Historical Preserve.

Consistent: Vernal pools within the Project area, which are located throughout the flat mesa, are generally small in area, only a few inches deep, and are dominated by ephemeral annual and perennial hydrophytes such as wooly heads (*Psilocarphus brevissimus*), coyote thistle (*Eryngium vaseyi*), common spikerush (*Eleocharis macrostachya*), and lowland cudweed (*Gnaphalium palustre*) (City of Goleta 2004). Long-term beneficial impacts on the Ellwood Mesa Open Space Area would include the overall reduction in erosion associated with the trail network including the removal of the berms which direct surface water flow toward to the bluffs. Additionally, the proposed Project would improve the quality of ESHA, consistent with the intent of GP/CLUP Policy OS 5.4, as it would include habitat restoration along the trail corridor and realignment of the Coastal and Anza trails per the GP/CLUP to avoid sensitive riparian and southern vernal pool habitat. As such, the project is consistent with CE 3.8.

Policy CE 4: Protection of Monarch Butterfly Habitat Areas [GP/CP]

Objective: *To preserve, protect, and enhance habitats for monarch butterflies in Goleta, including existing and historical autumnal and winter roost or aggregation sites, and promote the long-term stability of over-wintering butterfly populations.*

CE 4.4 Protection of Monarch Butterfly ESHAs. [GP/CP] Monarch butterfly ESHAs shall be protected against significant disruption of habitat values, and only uses or development dependent on and compatible with maintaining such resources shall be allowed within these ESHAs or their buffer areas. The following standards shall apply:

- a. No development, except as otherwise allowed by this policy, shall be allowed within monarch butterfly ESHAs or ESHA buffers.
- b. Since the specific locations of aggregation sites may vary from one year to the next, the focus of protection shall be the entire grove of trees rather than individual trees that are the location of the roost.
- c. Removal of vegetation within monarch ESHAs shall be prohibited, except for minor pruning of trees or removal of dead trees and debris that are a threat to public safety.
- d. Public accessways are considered resource-dependent uses and may be located within a monarch ESHA or its buffer; however, such accessways shall be sited to avoid or minimize impacts to aggregation sites.
- e. Interpretative signage is allowed within a monarch ESHA or its buffer, but shall be designed to be visually unobtrusive.
- f. Butterfly research, including tree disturbance or other invasive methods, may be allowed subject to City approval of a permit.

CE 4.5 Buffers Adjacent to Monarch Butterfly ESHAs. [GP/CP] A buffer of a sufficient size to ensure the biological integrity and preservation of the monarch butterfly habitat, including aggregation sites and the surrounding grove of trees, shall be required. Buffers shall not be less than 100 feet around existing and historic roost sites as measured from the outer extent of the tree canopy. The buffer area shall serve as transitional habitat with native vegetation and shall provide physical barriers to human intrusion. The buffer may be reduced to 50 feet in circumstances where the trees contribute to the habitat but are not considered likely to function as an aggregation site, such as along narrow windrows. Grading and other activities that could alter the surface hydrology that sustains the groves of trees are prohibited within or adjacent to the buffer area.

Consistent: Overwintering habitat for the Monarch Butterfly is protected under Policy CE 4 of GP/CLUP as an ESHA (City of Goleta 2006). Five monarch butterfly overwintering sites occur in the complex – Sandpiper Aggregation, Ellwood North, Ellwood West, Ellwood Main, and Ocean Meadows Roost. Approximately 50 acres of eucalyptus woodland in the Ellwood Complex support overwintering monarchs on a regular basis. If trail-construction activities within 100 feet of the edge of the eucalyptus groves that host known monarch butterfly aggregation sites would occur during the overwintering season for monarch butterflies (October 1 through March 31), a City-approved biologist must survey all eucalyptus trees within a 100-foot distance of the relevant trail and habitat

restoration areas (i.e., along the shared Coastal-Anza Trail and the western extent of the Coastal Loop Trail) to determine use by monarchs per GP/CLUP Policy CE 4.5. If butterfly aggregations are found within 100 feet of the work area, trail-construction must be halted until a City-approved biologist has determined monarchs have left the site. As such, the project is consistent with CE 4.4 and 4.5.

Policy CE 5: Protection of Other Terrestrial Habitat Areas [GP/CP]

Objective: *To preserve, protect, and enhance unique, rare, or fragile native flora and plant communities.*

CE 5.2 Protection of Native Grasslands. [GP/CP] In addition to the provisions of Policy CE 1, the following standards shall apply:

- a. For purposes of this policy, existing native grasslands are defined as an area where native grassland species comprise 10 percent or more of the total relative plant cover. Native grasslands that are dominated by perennial bunch grasses tend to be patchy. Where a high density of separate small patches occurs in an area, the whole area shall be delineated as native grasslands.
- b. To the maximum extent feasible, development shall avoid impacts to native grasslands that would destroy, isolate, interrupt, or cause a break in continuous habitat that would (1) disrupt associated animal movement patterns and seed dispersal, or (2) increase vulnerability to weed invasions.
- c. Removal or disturbance to a patch of native grasses less than 0.25 acre that is clearly isolated and is not part of a significant native grassland or an integral component of a larger ecosystem may be allowed. Removal or disturbance to restoration areas shall not be allowed.
- d. Impacts to protected native grasslands shall be minimized by providing at least a 10-foot buffer that is restored with native species around the perimeter of the delineated native grassland area.
- e. Removal of nonnative and invasive exotic species shall be allowed; revegetation shall be with plants or seeds collected within the same watershed whenever feasible.

Consistent: The Project plan proposes to increase native grasslands at Ellwood Mesa by adding native species along the trail, borrow pits, and other restoration areas. Additionally, any native grasses impacted by trail realignment would be relocated to suitable habitat and/or used in restoration plantings. As such, the project is consistent with CE 5.2.

CE 5.3 Protection of Coastal Bluff Scrub, Coastal Sage Scrub, and Chaparral ESHA. [GP/CP] In addition to the provisions of Policy CE 1, the following standards shall apply:

- a. For purposes of this policy, coastal bluff scrub is defined as scrub habitat occurring on exposed coastal bluffs. Example species in bluff scrub habitat include Brewer's saltbush (*Atriplex lentiformis*), lemonade berry (*Rhus integrifolia*), seashore blight (*Suaeda californica*), seacliff buckwheat (*Eriogonum parvifolium*), California sagebrush (*Artemisia californica*), and coyote bush (*Baccharis pilularis*). Coastal

sage scrub is defined as a drought-tolerant, Mediterranean habitat characterized by soft-leaved, shallow-rooted subshrubs such as California sagebrush (*Artemisia californica*), coyote bush (*Baccharis pilularis*), and California encelia (*Encelia californica*). It is found at lower elevations in both coastal and interior areas where moist maritime air penetrates inland. Chaparral is defined as fire- and drought-adapted woody, evergreen shrubs generally occurring on hills and Lower Mountain slopes. The area must have both the compositional and structural characteristics of coastal bluff scrub, coastal sage scrub, or chaparral habitat as described in Preliminary Descriptions of Terrestrial Natural Communities of California (Holland 1986) or other classification system recognized by the California Department of Fish and Game.

- b. To the maximum extent feasible, development shall avoid impacts to coastal bluff scrub, coastal sage scrub, or chaparral habitat that is part of a wildlife movement corridor and the impact would preclude animal movement or isolate ESHAs previously connected by the corridor such as (1) disrupting associated bird and animal movement patterns and seed dispersal, and/or (2) increasing erosion and sedimentation impacts to nearby creeks or drainages.
- c. Impacts to coastal bluff scrub, coastal sage scrub, and chaparral ESHAs shall be minimized by providing at least a 25-foot buffer restored with native species around the perimeter of the ESHA, unless the activity is allowed under other CE sub policies and mitigation is applied per CE 1.7.
- d. Removal of nonnative and invasive exotic species shall be allowed; revegetation shall be with plants or seeds collected within the same watershed whenever feasible. (*Amended by Reso. 09-59, 11/17/09*)

Consistent: Coastal sage scrub and coastal bluff scrub occur in various locations of the Ellwood Mesa Open Space Plan Area. Small isolated patches of coastal sage scrub frequently intergrade with native and non-native annual grassland and coyote bush. The Project proposes to increase coastal sage and bluff habitats along the entire blufftop at Ellwood Mesa by removing non-native species and planting native coastal species to the south and adjacent to the Coastal Trail. Coastal bluff scrub is found along the entire blufftop at Ellwood Mesa as well as along the bluff face. However, this habitat, particularly along the eastern end the bluff face, is highly degraded by erosional gullies and extensive coverage of non-native species. The Project proposes to remove these non-native species located to the south of the Coastal Trail and revegetate with native coastal species. Erosional gullies on the bluff face in these areas would also be revegetated to address bluff erosion. As such, the project is consistent with CE 5.3.

Policy CE 7: Protection of Beach and Shoreline Habitats [GP/CP]

Objective: *To preserve and protect the biological integrity of Goleta's beaches, dunes, coastal bluffs and other shoreline resources.*

CE 7.2 Protection of Dunes. [GP/CP] Dune ESHAs shall be protected and, where feasible, enhanced. Vehicle traffic through dunes shall be prohibited. Where pedestrian access through dunes is allowed, well-defined footpaths or other means of directing use and minimizing adverse impacts shall be used. Active nesting areas for sensitive birds, such as the western snowy plovers and least terns, shall be protected by fencing, signing, and other means.

CE 7.5 Shoreline Protective Structures. [GP/CP] New shoreline protective structures such as seawalls, revetments, and riprap shall be prohibited, except as provided in Policies SE 2 and SE 3.

Consistent: Implementation of the proposed Project would consist of trail improvements, including drainage crossings, beach access point improvements, and minor re-grading. No work is proposed for the coastal dunes. The Project does not include construction for seawalls, revetments, and riprap. As such, the project is consistent with CE 7.2 and 7.5.

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

Objective: *To preserve and protect habitats for threatened, endangered, or other special-status species of plants and animals in order to maintain biodiversity.*

CE 8.2 Protection of Habitat Areas. [GP/CP] All development shall be located, designed, constructed, and managed to avoid disturbance of adverse impacts to special-status species and their habitats, including spawning, nesting, rearing, roosting, foraging, and other elements of the required habitats.

CE 8.4 Buffer Areas for Raptor Species. [GP/CP] Development shall be designed to provide a 100-foot buffer around active and historical nest sites for protected species of raptors when feasible. In existing developed areas, the width of the buffer may be reduced to correspond to the actual width of the buffer for adjacent development. If the biological study described in CE 8.3 determines that an active raptor nest site exists on the subject property, whenever feasible no vegetation clearing, grading, construction, or other development activity shall be allowed within a 300-foot radius of the nest site during the nesting and fledging season.

Consistent: Implementation of the proposed Project would result in long-term beneficial impacts to a number of these special status species. Trail realignment per the GP/CLUP would relocate the shared Coastal-Anza Trail such that it avoids the eucalyptus grove to the north, reducing the long-term exposure of this riparian area to recreational use. Additionally, the proposed Project includes habitat restoration with objectives including the establishment of southern tarplant within the Ellwood Mesa Open Space Area using techniques utilized by the UCSB Cheadle Center for Biodiversity an Ecological Restoration, a center under the Office of Research provides stewardship and restoration of campus lands as well as preservation and management of natural collections . Consequently, implementation of the proposed Project may result in long-term beneficial impacts to sensitive species. As such, the project is consistent with CE 8.2 and 8.4.

Policy CE 10: Watershed Management and Water Quality [GP/CP]

Objective: *To prevent the degradation of the quality of groundwater basins and surface waters in and adjacent to Goleta.*

CE 10.3 Incorporation of Best Management Practices for Stormwater Management. [GP/CP] New development shall be designed to minimize impacts to water quality from increased runoff volumes and discharges of pollutants from nonpoint sources to the maximum extent feasible, consistent with the City's Storm Water

Management Plan or a subsequent Storm Water Management Plan approved by the City and the Central Coast Regional Water Quality Control Board. Post construction structural BMPs shall be designed to treat, infiltrate, or filter stormwater runoff in accordance with applicable standards as required by law. Examples of BMPs include, but are not limited to, the following:

- a. Retention and detention basins.
- b. Vegetated swales.
- c. Infiltration galleries or injection wells.
- d. Use of permeable paving materials.
- e. Mechanical devices such as oil-water separators and filters.
- f. Revegetation of graded or disturbed areas.
- g. Other measures as identified in the City's adopted Storm Water Management Plan and other City-approved regulations. (*Amended by Reso. 08-06, 2/19/08 and Reso. 09-59, 11/17/09*)

CE 10.4 New Facilities. [GP/CP] New bridges, roads, culverts, and outfalls shall not cause or contribute to creek bank erosion or creek or wetland siltation and shall include BMPs to minimize impacts to water quality. BMPs shall include construction phase erosion control, polluted runoff control plans, and soil stabilization techniques. Where space is available, dispersal of sheet flow from roads into vegetated areas, or other onsite infiltration practices, shall be incorporated into the project design.

CE 10.7 Drainage and Stormwater Management Plans. [GP/CP] New development shall protect the absorption, purifying, and retentive functions of natural systems that exist on the site. Drainage Plans shall be designed to complement and use existing drainage patterns and systems, where feasible, conveying drainage from the site in a nonerosive manner. Disturbed or degraded natural drainage systems shall be restored where feasible, except where there are geologic or public safety concerns. Proposals for new development shall include the following:

- a. A Construction-Phase Erosion Control and Stormwater Management Plan that specifies the BMPs that will be implemented to minimize erosion and sedimentation; provide adequate sanitary and waste disposal facilities; and prevent contamination of runoff by construction practices, materials, and chemicals.
- b. A Post-Development-Phase Drainage and Stormwater Management Plan that specifies the BMPs—including site design methods, source controls, and treatment controls—that will be implemented to minimize polluted runoff after construction. This plan shall include monitoring and maintenance plans for the BMP measures.

Consistent: In order to protect the genetic integrity of the native plant populations on the undeveloped portions of the subject property, the Final Restoration Plan must explicitly prohibit the use of non-locally collected native plants and seed materials restoration within or adjacent to open space areas. All seed or plant material must come from sources within the Devereux Creek watershed per GP/CLUP Policy OS 5.4(d). The Final Restoration Plan for the proposed Project must prohibit buried irrigation infrastructure; all temporary irrigation components must be placed above ground in open space areas. The potential for damage to the pipe by vandalism or exposure is

considered insufficient to offset the environmental damage caused by trenching to install pipes and structures and subsequent digging to remove pipes and structures. Pipes must be inspected monthly for leaks and all leaks must be repaired promptly to avoid erosion, weed establishment, or other environmental damage. As such, the project is consistent with CE 10.3, 10.4 and 10.7.

Policy CE 12: Protection of Air Quality [GP]

Objective: *To maintain and promote a safe and healthy environment by protecting air quality and minimizing pollutant emissions from new development and from transportation sources.*

CE 12.3 Control of Emissions during Grading and Construction. [GP] Construction site emissions shall be controlled by using the following measures:

- a. Watering active construction areas to reduce windborne emissions.
- b. Covering trucks hauling soil, sand, and other loose materials.
- c. Paving or applying nontoxic solid stabilizers on unpaved access roads and temporary parking areas.
- d. Hydroseeding inactive construction areas.
- e. Enclosing or covering open material stockpiles.
- f. Revegetating graded areas immediately upon completion of work.

Consistent: Short-term construction-related air quality impacts generally occur during Project grading activities. Preliminary earthwork quantities for the proposed Project are estimated at 900 cubic yards of cut and 900 cubic yards of fill, with approximately 15 cubic yards of exported material (i.e., asphalt proposed for removal from Beach Access Point E and potentially removed from the site if not suitable as fill). As a result, PM10 associated with construction grading is estimated to be approximately 37 lbs./day. Construction-related ROC and NOx emissions associated with the proposed Project are estimated to be approximately 12 lbs./day and 71 lbs./day respectively (please refer to Attachment 2, URBEMIS daily summer emission summary). Neither the City of Goleta nor the SBCAPCD has adopted any significance thresholds for construction-generated ROC, NOx, or PM10. However, these emissions have been incorporated into the 2010 CAP in terms of the overall emissions inventory for construction activities. Therefore, air quality impacts associated with Project construction are considered adverse, but less than significant. Further construction-related air quality impacts would be minimized with the implementation of MM AQ-1, -2, and -3, which would reduce PM10 emissions as well as equipment exhaust and diesel exhaust emissions and pollutants. As such, the project is consistent with CE 12.3.

VISUAL AND HISTORIC RESOURCES ELEMENT

Policy VH 1: Scenic Views [GP/CP]

Objective: *To identify, protect, and enhance Goleta's scenic resources and protect views or vistas of these resources from public and private areas. (Amended by Reso. 08-30, 6/17/08)*

VH 1.3 Protection of Ocean and Island Views. [GP/CP] Ocean and island views from public viewing areas shall be protected. View protection associated with development

should be accomplished first through site selection and then by use of design alternatives that enhance rather than obstruct or degrade such views. To minimize impacts to these scenic resources and ensure visual compatibility, the following development practices shall be used, where appropriate:

- a. Limitations on the height and size of structures.
- b. Limitations on the height and use of reflective materials for exterior walls (including retaining walls) and fences.
- c. Clustering of building sites and structures.
- d. Shared vehicular access to minimize curb cuts.
- e. Downcast, fully shielded, full cut off lighting of the minimum intensity needed for the purpose.
- f. Use of landscaping for screening purposes and/or minimizing view blockage as applicable.
- g. Selection of colors and materials that harmonize with the surrounding landscape.
(Amended by Reso. 08-30, 6/17/08)

VH 1.5 Protection of Open Space Views. [GP/CP] Views of open space, including agricultural lands, from public areas shall be protected. View protection associated with development should be accomplished first through site selection and then by use of design alternatives that enhance rather than obstruct or degrade such views. To minimize impacts to these scenic resources, the following development practices shall be used, where appropriate:

- a. Limitations on the height and size of structures.
- b. Clustering of building sites and structures.
- c. Shared vehicular access to minimize curb cuts.
- d. Downcast, fully shielded, full cut off lighting of the minimum intensity needed for the purpose.
- e. Use of landscaping for screening purposes and/or minimizing view blockage as applicable.
- f. Selection of colors and materials that harmonize with the surrounding landscape.
(Amended by Reso. 08-30, 6/17/08)

VH 1.6 Preservation of Natural Landforms. [GP/CP] Natural landforms shall be protected. Protection associated with development should be accomplished first through site selection to protect natural landforms and then by use of alternatives that enhance and incorporate natural landforms in the design. To minimize alteration of natural landforms and ensure that development is subordinate to surrounding natural features such as mature trees, native vegetation, drainage courses, prominent slopes, and bluffs, the following development practices shall be used, where appropriate:

- a. Limit grading for all development including structures, access roads, and driveways. Minimize the length of access roads and driveways and follow the natural contour of the land.
- b. Blend graded slopes with the natural topography.
- c. On slopes, step buildings to conform to site topography.
- d. Minimize use of retaining walls.
- e. Minimize vegetation clearance for fuel management.

- f. Cluster building sites and structures.
- g. Share vehicular access to minimize curb cuts. (*Amended by Reso. 08-30, 6/17/08*)

Consistent: Implementation of the proposed Project would consist of trail improvements, including drainage crossings, beach access point improvements, and minor re-grading. The Project would result in localized and temporary obstruction of views over the three-month trail construction period. During this time, a viewer would see a mix of trail construction equipment along the trails on Ellwood Mesa, particularly concentrated near the proposed crossings and beach access points. Additionally, portions of the California Coastal Trail and Anza Trail may be temporarily closed during trail construction. These impacts would be consistent with temporary impacts that may be experienced during future trail maintenance activities. Implementation of the proposed Project would result in localized, short-term construction-related impacts to visual resources. Long-term impacts to visual resources would be beneficial and would not contribute considerably to any adverse cumulative impacts with regard to visual resources. As such, the project is consistent with VH 1.3, 1.5, and 1.6.

NOISE ELEMENT

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

Objectives: *To protect Goleta's residents, workers, and visitors from excessive noise by applying noise standards in land use decisions. To ensure compatibility of land uses with noise exposure levels, and to neither introduce new development in areas with unacceptable noise levels nor allow new noise sources that would impact existing development.*

NE 6.1 Enforcement of Noise Ordinances. [GP] The City shall enforce regulations and standards set forth in a City Noise Ordinance. The City shall periodically review noise regulations and update or add regulations that control noise generation appropriately.

NE 6.2 Enforcement of Restrictions in Open-Space Areas. [GP] The City shall enforce restrictions or prohibitions on motorized vehicles in City-owned open-space areas unless such operation is allowed by permit. Signage stating such restrictions or prohibitions shall be provided and maintained in good order, and the need for additional signage shall be considered periodically.

NE 6.4 Restrictions on Construction Hours. [GP] The City shall require, as a condition of approval for any land use permit or other planning permit, restrictions on construction hours. Noise-generating construction activities for projects near or adjacent to residential buildings and neighborhoods or other sensitive receptors shall be limited to Monday through Friday, 8:00 a.m. to 5:00 p.m. Construction in nonresidential areas away from sensitive receivers shall be limited to Monday through Friday, 7:00 a.m. to 4:00 p.m. Construction shall generally not be allowed on weekends and state holidays. Exceptions to these restrictions may be made in extenuating circumstances (in the event of an emergency, for example) on a case by case basis at the discretion of the Director of Planning and Environmental Services. All construction sites subject to such restrictions shall post the allowed hours of operation near the entrance to the site, so that workers on site are aware of this limitation. City staff shall closely monitor

compliance with restrictions on construction hours, and shall promptly investigate and respond to all noncompliance complaints.

NE 6.5 Other Measures to Reduce Construction Noise. [GP] The following measures shall be incorporated into grading and building plan specifications to reduce the impact of construction noise:

- a. All construction equipment shall have properly maintained sound-control devices, and no equipment shall have an unmuffled exhaust system.
- b. Contractors shall implement appropriate additional noise mitigation measures including but not limited to changing the location of stationary construction equipment, shutting off idling equipment, and installing acoustic barriers around significant sources of stationary construction noise.
- c. To the extent practicable, adequate buffers shall be maintained between noise generating machinery or equipment and any sensitive receivers. The buffer should ensure that noise at the receiver site does not exceed 65 dBA CNEL. For equipment that produces a noise level of 95 dBA at 50 feet, a buffer of 1600 feet is required for attenuation of sound levels to 65 dBA.

Consistent: Implementation of the proposed Project would result in an incremental contribution to cumulative construction-related noise. However, within implementation of MM NOI-1, -2, and -3, which would limit construction timing, shield noise, and implement BMPs. the proposed Project's contribution would be minor. Additionally, noise as result of construction-related activity would be short-term and no long-term increases in noise would result. As such, the project is consistent with NE 6.1, 6.2, 6.4, and 6.5.

TRANSPORTATION ELEMENT

Policy TE 10: Pedestrian Circulation [GP]

Objective: *To encourage increased walking for recreational and other purposes by developing an interconnected, safe, convenient, and visually attractive pedestrian circulation system.*

TE 10.1 Pedestrian System Map. [GP] Figure 7-5 depicts the various locations that are planned to serve as pedestrian pathways, including sidewalks within public street rights-of-way, trails, parks, open spaces, and beaches. The map identifies locations of proposed improvements to the pedestrian circulation system, particularly where there are missing links in the existing system as of 2005.

Consistent: Implementation of the proposed Project would result in short-term construction related impacts associated with an increase in construction-related traffic and use of Sperling Parking Lot. Implementation of the proposed Project would require approximately five round trips from haul truck with a three cubic yard haul capacity. These trips would incrementally increase traffic within the vicinity of the Ellwood Mesa Open Space Plan Area. Additionally, approximately five to ten parking spaces would be occupied during construction activities. However, these impacts would be short-term and minor and would not considerably contribute to adverse cumulative impacts. As such, the project is consistent with 10.1.