Goleta Point Faculty Housing
Final Environmental Impact Report

Lead Agency:
Office of Campus Planning and Design
University of California, Santa Barbara
Santa Barbara, CA 93106-1030
805.893.3796, 805.893.4091

Agent:
Prime Time Consulting
Coast Village Road
Montecito, CA

Prepared by:
Lauren Sharwood

March 2015

Table of Contents

Section **Page**

Table of Contents (continued)

List of Figures **Page**

List of Tables **Page**

1.0 Executive Summary

This document is a Final Environmental Impact Report (FEIR) prepared in accordance with the California Environmental Quality Act (CEQA) and CEQA Guidelines to assess potential significant environmental impacts of the proposed Goleta Point Faculty Housing Project within the University of California, Santa Barbara campus. The UC Santa Barbara Office of Campus Planning and Design is the agency with principal responsibility for review of the proposed project and is therefore the lead agency for the FEIR. The proposed project applicant and property owner is University of California.

The Goleta Point Faculty Housing Project is a mixed-use undertaking that combines residential units with classroom space over 72,816 sq. ft. Its project objectives include (1) helping to address the shortage of housing and classrooms due to an influx of students and staff, (2) being done in an environmentally sustainable manner with at least LEED Silver certification, and (3) no disturbance of sensitive biological or archaeological resources.

The issue of developing over an Environmentally Sensitive Habitat Area (ESHA) has been raised by members of the public. Table 1.0 EIR Summary includes a list of impacts to biological resources along with mitigation measures to lessen their significance.

Table 1.0 EIR Summary

Environmental Impact	Level of Significance Without Mitigation	Mitigation Measure	Level of Significance with Mitigation
Impact BIO-1: Native Coast Live Oak removal	Class II	A qualified arborist shall prepare a Tree Protection Plan (TPP) and oak woodland restoration plan for Lead Agency review. Removed Coast Live Oaks shall be restored on a 5:1 ratio.	Less-than-significant
Impact BIO-2: Elimination of rare and native salt marsh species along with the habitat of these species	Class II	A qualified biologist shall prepare a Habitat Protection Plan (HPP) and restoration plan for Lead Agency review. Removed salt marsh habitat shall be on a 3:1 ratio.	Less-than-significant
Impact BIO-3: Removal of a current restoration site	Class II	A qualified biologist with CCBER shall prepare a new restoration plan for Lead Agency review.	Less-than-significant

Note: Class II: Significant but can be mitigated to less-than-significant

CEQA Guidelines Section 15126.6 also requires that an EIR describe a range of feasible alternative projects to the proposed project that would still attain the basic project objectives while avoiding or substantially lessening at least one or more of the project's significant impacts. Table 1.1 Comparison of Alternative Impacts identifies significant impacts of the Proposed Project, No Project Alternative, Reduced Project Alternative, and Off-site Project Alternative.

Table 1.1 Comparison of Alternative Impacts

Impact	Proposed Project	No Project Alt.	Reduced Project Alt.	Off-site Project Alt.
BIO-1: Native coast live oak removal	Class II	Class III (-)	Class III (-)	Class III (-)
BIO-2: Removal of native salt marsh species and habitat	Class II	Class III (-)	Class II (-)	Class III (-)
BIO-3: Interference of current restoration efforts	Class II	Class III (-)	Class II (-)	Class III (-)

Note:

- Class I: Significant and unmitigable
- Class II: Significant but can be mitigated to less-than-significant
- Class III: Insignificant
- Class IV: Beneficial
- Impacts with (=) would be equal to the project
- Impacts with (-) would be equal to the project
- Impacts with (+) would be equal to the project

The Off-site Project Alternative is the Environmentally Superior Alternative because it has the highest number of reduced impacts relative to the proposed project while still meeting all of the project objectives.

4.0 Impact Analysis:

4.1 Significance Criteria:

Thresholds of Significance are found in the California State CEQA Law (Statute) and Guidelines as well as County of Santa Barbara Planning and Development: Environmental Thresholds and Guidelines Manual (2008). CEQA Guidelines Section 15382 states that a "significant effect on the environment" means a substantial change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change alone shall not be considered a significant effect on the environment. According to the County of Santa Barbara Planning and Development: Environmental Thresholds and Guidelines Manual (2008), "qualitative guidelines rather than numerical thresholds" are typically used to assess the value of biological resources provided.

Types of Impacts to Biological Resources: Based on the County of Santa Barbara Environmental Thresholds Manual (2008), disturbance to habitats or species may be significant based on substantial evidence in the record (not public controversy or speculation), if they substantially impact significant resources by the following ways:

1) Substantially reduce or eliminate species diversity or abundance
2) Substantially limit reproductive capacity through losses of individuals or habitat
3) Substantially limit or fragment range and movement (seed dispersal routes).

CEQA Guidelines Appendix G states that a project would normally have a significant effect on the environment if it would conflict with adopted environmental plans and goals of the community where it is located.

4.2 Project Impacts:

4.2.1 Impact BIO-1:

Impact BIO-1: The construction activity of grading for the proposed road would result in native Quercus agrifolia (coast live oak) removal. County of Santa Barbara Environmental Thresholds Manual states that native specimen trees, regardless of size, are potentially significant, and rare native trees, which are very low in number or isolated in distribution may be potentially significant. The Thresholds Manual also states that disturbance to habitats or species may be significant if they "substantially reduce or eliminate species diversity or abundance" or "substantially limit reproductive capacity through losses of individuals or habitat." CEQA Guidelines Appendix G states that a project would normally have a significant effect on the environment if it would "substantially affect a rare or endangered species of plant or habitat of this species."

Construction Impacts: Grading for the proposed road would occur over a period of four months. The project applicant did not include what time of year the grading would occur. Therefore, it is reasonable to believe that the grading would prevent fallen acorns from germinating, limiting the reproductive capacity of the coast live oaks. Grading for the proposed road would also result in habitat fragmentation of the coast live oaks, removal of understory, and disruption of the canopy. Fragmenting the coast live oak habitat to make room for the road would create a permanent barrier to movement for the acorns. Cutting 24 ft. into the slope and creating a concrete retaining wall would permanently disrupt the coast live oak habitat. As stated in the Environmental Setting, based on the site visit, it appears that five underdeveloped coast live oaks along with three adult coast live oaks are located on the north-facing slope ranging from three to ten ft. away from the lagoon. According to Santa Barbara County thresholds, the loss of 10 percent or more of the trees of biological value on a project site is considered potentially significant. It appears that eight out of 30 coast live oaks would be removed to make room for the proposed road. Therefore, grading for the proposed road would result in the removal of greater than 10 percent of native coast live oaks

and their reproductive capacity would be limited. This would represent a *potentially significant impact*. Fig. 4.2.1 Coast Live Oaks Site Visit was taken at the January 15, 2015 site visit and is looking up at the North-facing slope. Illustrated are the five underdeveloped coast live oaks along the slope along with two of the three adult oaks.

Fig. 4.2.1 Coast Live Oaks Site Visit

Figure 4.2.1-1 Project Site Grading and Access Plan, courtesy of Stella Steele, also illustrates where the picture was taken and where the adult and underdeveloped coast live oaks are located in reference to the proposed road.

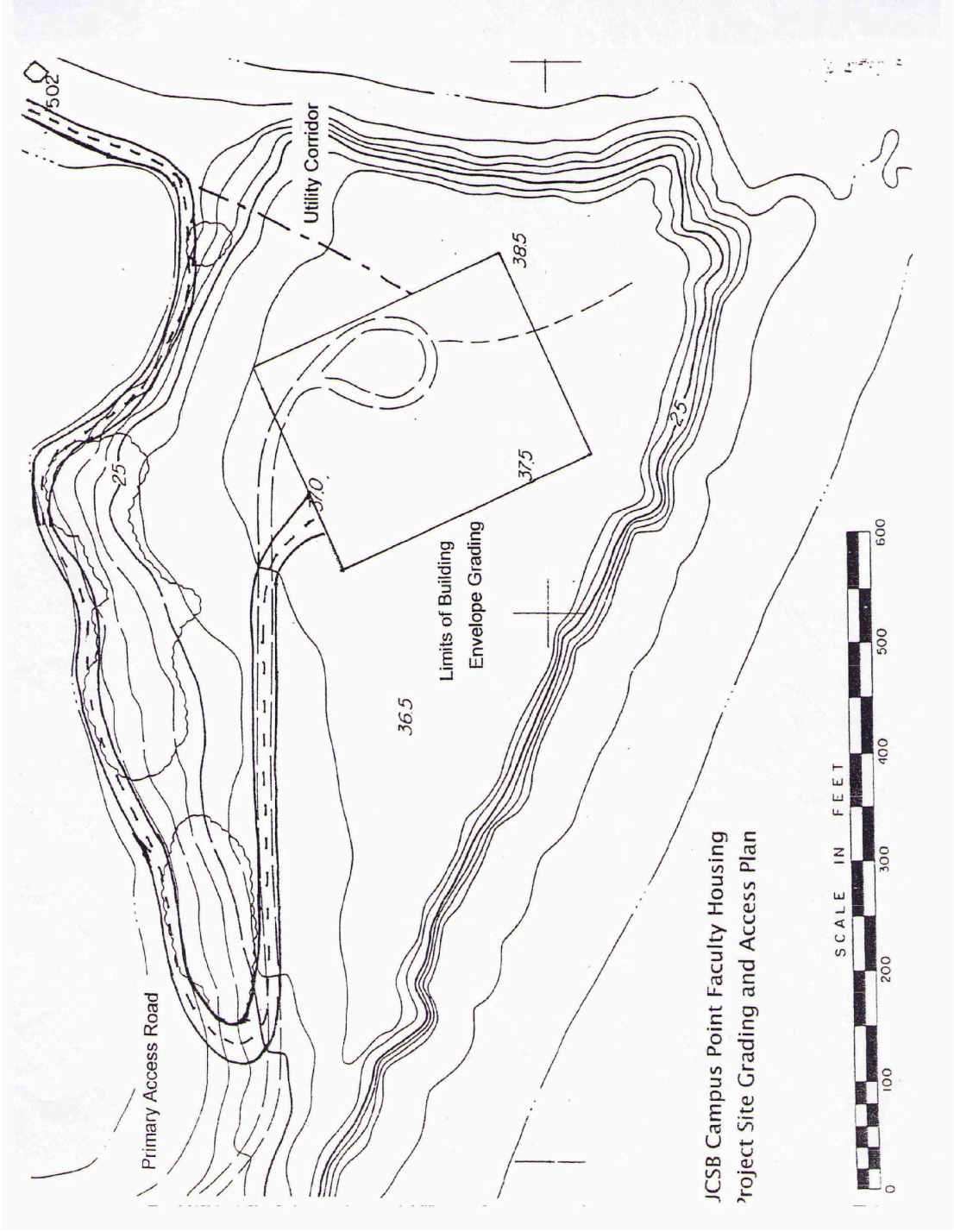


Figure 4.2.1-1 Project Site Grading and Access Plan

Operational Impacts: The proposed road and structure would permanently prevent acorn dispersal and remove and fragment coast live oak habitat on the north-facing slope. The removal of greater than ten percent of these native coast live oaks would be a *potentially significant impact*.

4.2.2 Impact BIO-2:

Impact BIO-2: The proposed structure would substantially reduce and eliminate rare and native salt marsh species diversity and abundance along with the habitat of these species. CEQA Guidelines Appendix G states that a project would normally have a significant effect on the environment if it would "substantially affect a rare or endangered species of plant or the habitat of the species." County of Santa Barbara Planning and Development Environmental Thresholds and Guidelines Manual states that disturbance to habitats or species may be significant if they "substantially reduce or eliminate species diversity or abundance."

Construction Impacts: Grading would occur over a period of four months and construction of the proposed structure and road would follow for six more months. Based on the January 15 site visit, the proposed structure and road are located directly on top of and adjacent to *Distichlis spicata* (saltgrass), *Jaumea carnosa* (marsh jaumea), *Salicornia virginica* (pickleweed), and *Frankenia salina* (alkali heath), all of which are native salt marsh species. The activity of construction would eliminate these native salt marsh species. According to CCBER, fewer than 30 salt marshes remain in Southern California. Construction of the proposed road and structure would significantly reduce one of these salt marshes by 200 sq. ft. In addition, it is reasonable to believe that the four months of grading could occur during winter months, which experience rain. The removal of topsoil could run off into the lagoon, disrupting the ability of native *Anemopsis californica* (lizard tail) and special status species, *Abronia maritime* (red sand verbena), *Malacothrix saxatilis* (cliff desertdandelion), *Lasthenia glabrata* (yellowray goldfields), and *Passerculus sandwichensis beldingi* (savannah sparrow) to grow.

Operational Impacts: The abundance of *Distichlis spicata* (saltgrass), *Jaumea carnosa* (marsh jaumea), *Salicornia virginica* (pickleweed), and *Frankenia salina* (alkali heath) would be permanently reduced by the proposed structure and road. The proposed structure and road would also fragment habitat of these species. In addition, because the second and third floor operations are residential, it is reasonable to assume that these units would allow the residence of domestic animals. Thus, domestic animals such as dogs could get out of the perimeter fencing and disrupt the remaining native species in the surrounding area. In addition, the proposed road would have a substantial increase of cars and pollutants such as oil in the area. Because the climate where the proposed project site is located often experiences rain in the winter, it is reasonable to assume that a rain event would cause oil runoff into native and special status species' habitat. Petroleum hydrocarbons act as toxins and directly reduce litter quality, which is a major determinant of litter decomposition rates in soil systems, and therefore fertility of the soil. This directly limits native flora's ability to grow. According to County of Santa Barbara Planning and Development: Environmental Thresholds and Guidelines Manual (2008), "because of the high value and extremely limited extent of salt marsh habitat in the County, small areas of such coastal salt marsh habitat may be considered significant". This reduced diversity and abundance of native and special status species along with reduction of 200 sq. ft. of extremely limited salt marsh habitat on the proposed project site and surrounding area would be a *potentially significant impact*.

4.2.3 Impact BIO-3:

Impact BIO-3: The proposed project would interfere with current restoration efforts on the premises. CEQA Guidelines Appendix G states that a project would normally have a significant effect on the environment if it would "conflict with the provisions of an adopted Habitat Conservation Plan,

Natural Community Conservation Plan, or any other local, regional, or state habitat conservation plan". The proposed project is located within CCBER's Lagoon Island and Campus Point management site. A combination of mitigation funding for the UCEN expansion and funding from Housing and Residential Services contributed to several large restoration projects in and around the lagoon in 1995, including the creation of salt marsh and coast live oak habitats. The proposed project would result in a permanent disruption of this restoration effort. In addition, according to CCBER, plants and animals located in the salt marsh are diverse and respond to delicate variations in salinity, topography, and hydrology, so they are challenging to restore. In figure 4.2.3 CCBER Restoration Site Map, courtesy of Stella Steele, striations drawn by Lauren Sharwood illustrate what is currently under CCBER Management. Because the proposed project would directly interfere with a current restoration site, this would be a *potentially significant impact*.

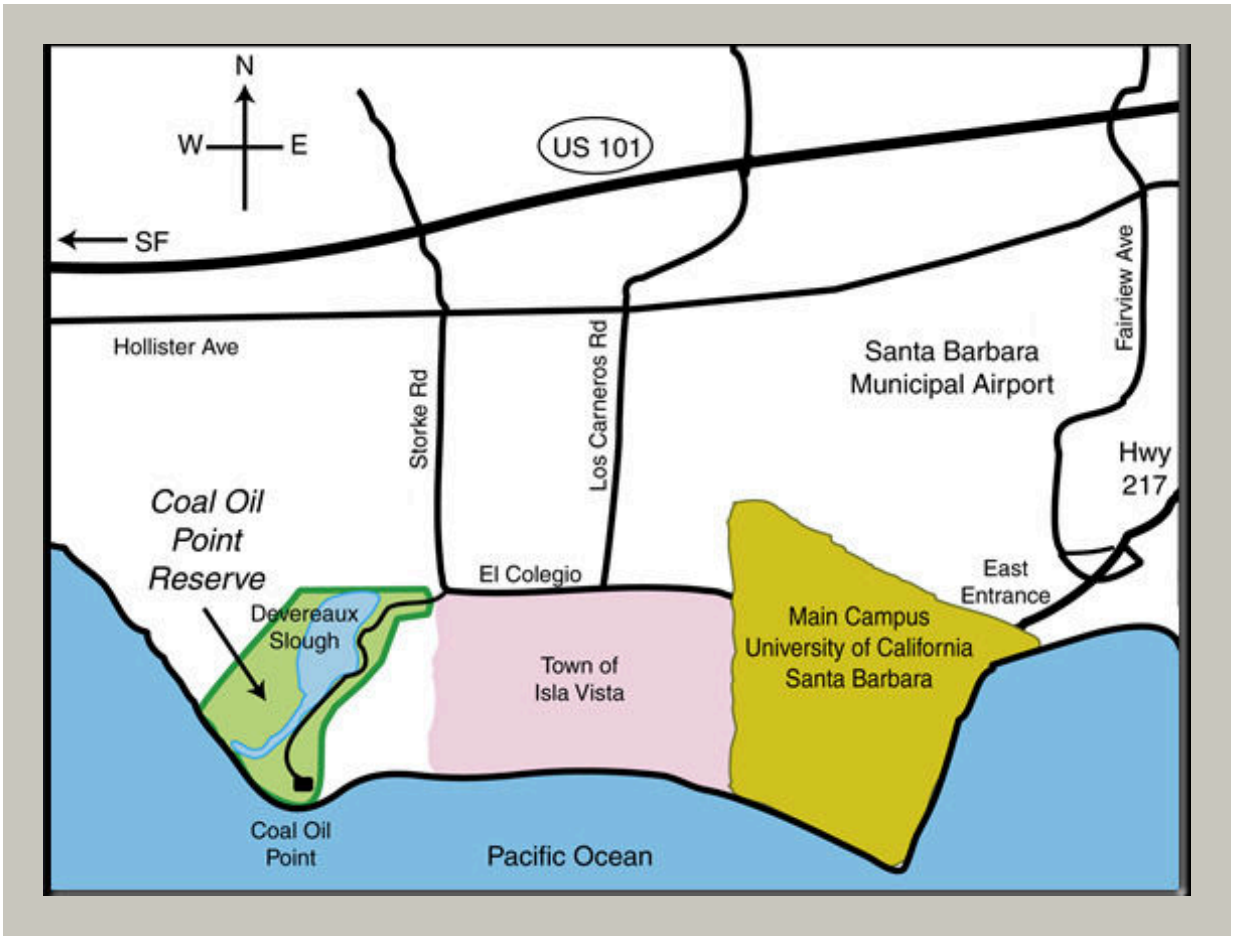
5.0 Mitigation Measures

The following measures would be required to address significant environmental impacts on native species, habitat, and restoration site removal resulting from construction and operation of the proposed project.

5.1 Mitigation Measure BIO-1:

MM BIO-1: In order to *minimize* and *restore* the impact of removal of greater than 10 percent of native coast live oaks, the applicant shall develop best management practices in the form of a coast live oak protection plan and restoration plan that includes measures capable of recovering the current coast live oaks or planting new coast live oak trees on a ratio of 5:1. Because not all trees planted would survive, it is imperative for the applicant to plant enough to ensure the survival of five times the original eight removed during the construction process. The coast live oaks shall be planted in a natural oak woodland habitat near the property. Figure 5.1 Proposed Site for Coast Live Oak Planting highlights an area in orange near the Devereux lagoon where an oak woodland habitat is currently located. If the applicant chooses to plant within Coal Oil Point Reserve, it is necessary to contact the head restoration manager for that site for further instructions.

Figure 5.1 Proposed Site for Coast Live Oak Planting



Mitigation Monitoring Requirement Plan (MMRP) Regulations: The applicant shall submit a Tree Protection Plan (TPP) prepared by an International Society of Arboriculture (ISA) certified arborist. The project arborist shall attend a pre-construction meeting with the contractors to explain the tree protection and monitoring requirements.

- Prior to any clearing and grading, fencing at least 4-feet tall shall be placed around trees not expected to be removed in order to preserve the foliage and preserve roots to minimize tree loss.

- The arborist shall monitor all grading and construction activities onsite. It may be easier to recover the underdeveloped oaks and plant them as perimeter shrubbery, as the applicant stated there would be perimeter shrubbery around the property in section 2.7.3 Perimeter Shrubbery.
- Because the grown coast live oaks most likely would not survive removal and transplantation, the rest of the trees required would either be started off from seed or transplanted from elsewhere.
- If it becomes necessary to remove a tree not planned for removal, if feasible, the tree shall be boxed and replanted. If an approved arborist certifies that it is not feasible to replant the tree, it shall be replaced on a 5:1 basis from locally obtained seed. Local seed may be obtained from CCBER.
- If replacement trees cannot all be accommodated on site as perimeter shrubbery, a plan must be approved by the arborist for replacement trees to be planted offsite. These replacement trees shall be limited to coast live oaks strictly.
- If the applicant cannot feasibly meet the 40 oak tree mitigation measure, they shall pay a *compensation* fee of $300 per tree. This money shall be given to CCBER to plant coast live oaks elsewhere.

The applicant may refer to CCBER's Oak Woodland Restoration Plan for suggestions. CCBER planted acorns within blue plastic cylinders or "tree tubes" that extend approximately 1.5 ft. below ground and 1.5 ft. above ground. The tubes help protect the seedlings from gophers, ground squirrels, brush rabbits, and other herbivores while also providing shade and collecting moisture which is beneficial to young seedlings. CCBER planted two acorns within each tube due to low germination rates. Oak survival has been high over the four years of monitoring, with the majority of the oaks being in "good or medium condition". New planted and transplanted trees shall be gopher and chain link fenced, irrigated with drip irrigation on a timer, and weaned off of irrigation over a period of two years to ensure survival.

Residual Impacts: The removal of any number of coast live oaks would result in a significant impact. However, by compensation or ensuring five times the original eight survive in a nearby location, the mitigation measure would reduce the significant impact to *less that significant (Class II).*

Table 5.1 Mitigation Measure BIO-1

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM BIO-1	A qualified arborist shall prepare the TPP and oak woodland restoration plan for Lead Agency review. These plans shall detail the location and specifications of mechanisms to be used to ensure maximum tree survival.	The applicant shall demonstrate to compliance staff that habitat correction is completed prior to Final Building Clearance. The TPP and oak woodland restoration plan shall be reviewed and approved by the UCSB Office of Planning and Research prior to issuance of building permits, occupancy clearance, and vegetation removal.	An approved arborist shall monitor the coast live oaks every three months over a period of ten years, or until coast live oaks are established, to ensure the survival of at least 80 trees.

5.2 Mitigation Measure BIO-2:

MM BIO-2: In order to *minimize* the impact of substantially reducing and eliminating native species diversity and abundance and the habitat of these species, the applicant shall use best management practices in the form of a Habitat Protection Plan (HPP) and *restore* removed habitat area on a 3:1

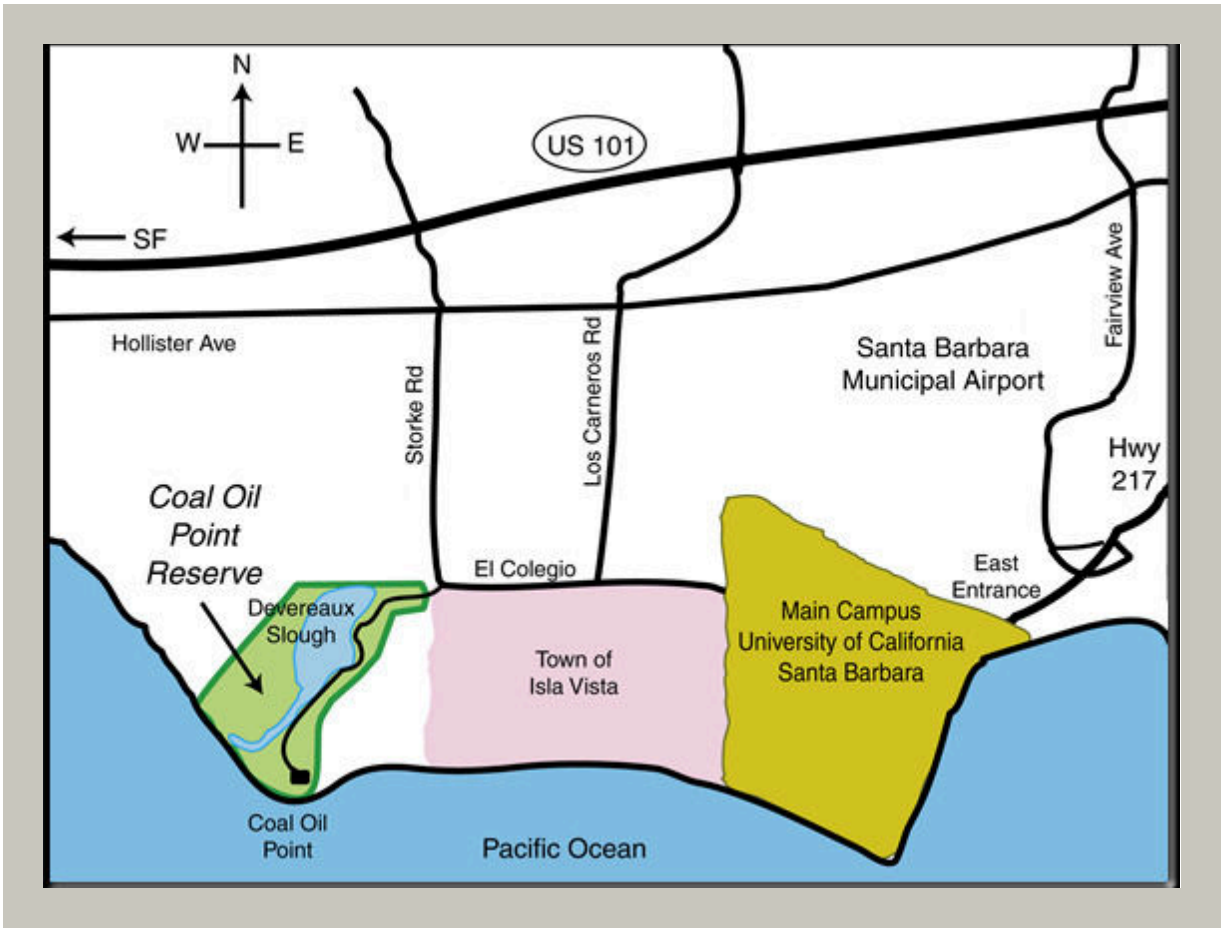
ratio. The applicant shall create a Habitat Protection Plan (HPP) with various elements to minimize habitat and species removal.

MMRP Regulations: Though the applicant may choose specific methods to do this, the following must be included in the HPP:

- Excavation work within or adjacent to sensitive habitats including salt marshes shall be avoided to the maximum extent feasible.
- An approved biologist shall direct the work.
- Where excavation must be performed within sensitive areas, it shall be performed with hand tools only. If the use of hand tools is infeasible, excavation work may be completed with rubber-tired construction equipment weighing five tons or less.
- Grading shall be designed to ensure that habitat areas have proper drainage during and after construction, per biologist recommendations.
- To prevent further damage during construction, all *Distichlis spicata* (seashore saltgrass), *Jaumea carnosa* (marsh jaumea), *Salicornia virginica* (pickleweed), and *Frankenia salina* (alkali heath) native salt marsh species shall be temporarily fenced with chain-link. Any excavation within the sensitive root zone of any specimen within the habitat, cleanly cutting any roots of one inch in diameter or greater within the habitat, and tree removal and trimming within the habitat shall all be done by hand and under supervision of an approved biologist. This would feasibly add about an extra month of construction.
- Wherever feasible, specimens shall be boxed and replanted.
- All landscaping, excluding some perimeter shrubbery for coast live oaks, on the proposed project site shall be done with native salt marsh plants and seed stock from locally obtained sources.

Residual Impacts: The HPP would not reduce impacts below a significant level because the project would still substantially reduce and eliminate native species diversity and abundance and the habitat of these species. Therefore, restoration on a 3:1 ratio of the removed area would be implemented. The highlighted orange area in Figure 5.2 Proposed Site for Salt Marsh Habitat and Species Restoration illustrates a suggested area to place the 3:1 restored salt marsh area.

Figure 5.2 Proposed Site for Salt Marsh Habitat and Species Restoration



A good restoration program for this site would be with CCBER. CCBER handles most restoration efforts nearby. The new restoration site shall consist of at least 40 percent cover of the removed native salt marsh species. The applicant, with the help of CCBER, shall determine how they will reach this standard and illustrate it through a restoration plan monitoring report.

Vegetation cover percentages through each season, GIS monitoring, photo monitoring, hours spent performing manual labor, and any project updates shall be included in the monitoring report. A critical part of a restoration effort is percent native vs. percent nonnative cover. The site shall not exceed 20 percent nonnative cover by the fifth year of monitoring. In addition, the restoration plan report and monitoring report shall include a baseline vegetation cover in order to compare to current seasons to see progress. The HPP and restoration on a 3:1 ratio of lost salt marsh habitat would reduce the significant impact to *less that significant (Class II)*.

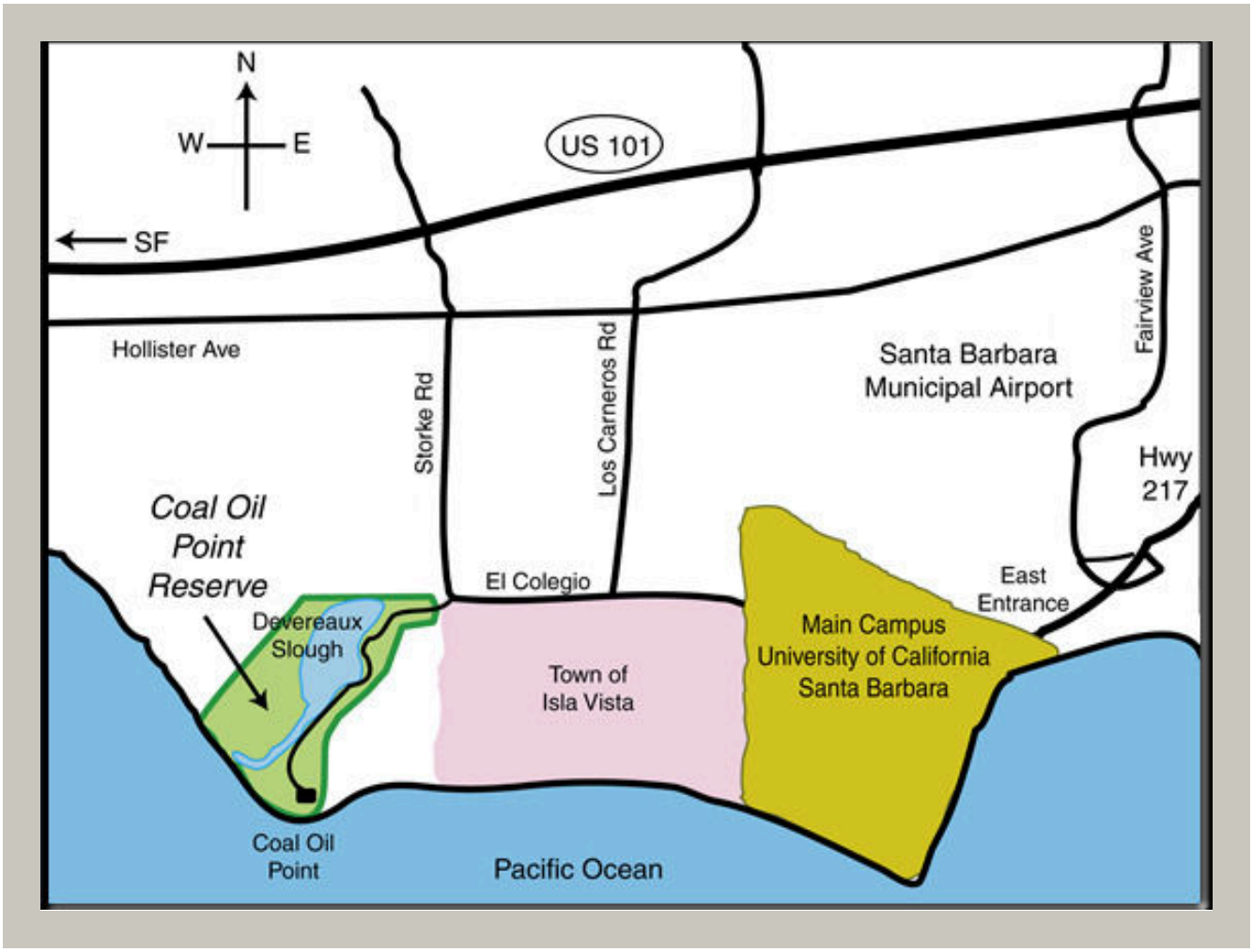
Table 5.2 Mitigation Measure BIO-2

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM BIO-2	A qualified biologist shall prepare the HPP and restoration plan for Lead Agency review. These plans shall detail the location and specifications of mechanisms to be used to minimize salt marsh habitat loss and restore removed habitat area on a 3:1 ratio.	The HPP and restoration plan report shall be reviewed and approved by the UCSB Office of Planning and Research prior to issuance of building permits, occupancy clearance, and vegetation removal.	A restoration plan monitoring report shall be sent in each year to the California Coastal Commission to monitor effectiveness of the mitigation. Monitoring shall occur at least once a month for a minimum of ten years or until the restored salt marsh habitat is complete and stable.

5.3 Mitigation Measure BIO-3:

In order to *rectify* the 200 sq. ft. loss of a current restoration site on the proposed project site, the applicant shall develop a new restoration plan in a nearby location. The university currently owns the parcel of land between Devereux Slough and the community of Isla Vista highlighted in orange on Figure 5.2 Proposed New Restoration Site, below. This parcel of land could be a possible new restoration site.

Figure 5.3 Proposed New Restoration Site



MMRP Plan Regulations: The university shall allocate the highlighted property in Figure 5.2 Proposed New Restoration Site as the new restoration site for the proposed project. The applicant shall hire a restoration program to head the restoration effort. Once more, a suggested restoration program would be CCBER because their restoration site is the area that the proposed project would remove. The area of the restoration site shall be the same size as the removed restoration site, 200 sq. ft. The restoration effort shall restore oak woodlands, coastal dunes, vernal marshes, and coastal sage scrub habitats found on the current restoration site that would be removed by the proposed project. If feasible, these habitats shall all be found in the new restoration site. The special status species *Abronia maritima* (red sand verbena), *Malacothrix incana* (dunedelion), *Lasthenia glabrata ssp. coulteri* (coulter's goldfields), *Passerculus sandwichensis beldingi* (belding's savannah sparrow) must account for at least 51 percent of the vegetative cover by the fifth year. In addition, wetland vegetation shall be planted in soils with the highest clay content in order to maximize survival in these especially sensitive species.

CCBER shall keep a site monitoring report to measure effectiveness of the mitigation. Vegetation cover percentages through each season, GIS monitoring, photo monitoring, hours spent performing manual labor, and any project updates shall be included in the monitoring report. The

site shall not exceed 20 percent nonnative cover by the fifth year of monitoring. CCBER shall include a baseline vegetation cover in order to compare to current seasons to see progress.

Residual Impacts: The proposed project would still remove a restoration site; however, by creating a new restoration site of equal size less than two miles away, the mitigation measure would reduce the significant impact to *less that significant (Class II)*.

Table 5.3 Mitigation Measure BIO-3

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM BIO-3	A qualified biologist with CCBER shall prepare a restoration plan for Lead Agency review. These plans shall detail the location and specifications of the restoration mechanisms to be used. A site monitoring report shall also be prepared for the California Coastal Commission.	The restoration plan shall be reviewed and approved by the UCSB Office of Planning and Research prior to issuance of building permits, occupancy clearance, and vegetation removal.	A restoration site monitoring report shall also be prepared for the California Coastal Commission each year to monitor effectiveness of the mitigation. Monitoring shall occur at least once a month for at least ten years or until restoration is complete and stable.

6.0 Cumulative Impacts:

CEQA Guidelines Section 15130 requires the consideration of cumulative impacts within an EIR when a project's incremental effects are cumulatively considerable. Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The conversion of the site from Open Space/ESHA to a developed classroom/housing development would contribute to the cumulative, adverse biological impacts associated with the ongoing development in the local area. This analysis of the proposed project will be based off of qualitative as well as quantitative reasoning. Table 6.1 Cumulative Project Impacts lists proposed, approved, and reasonably foreseeable future projects within the region of influence in attempts to identify if the proposed project would provide a contribution to regional impacts. Attached, Figure 6.0 Region of Influence from 2010 UCSB LRDP illustrates location of the projects considered for cumulative impacts. The region of influence for the proposed project is any area within the vicinity of the UCSB campus that would affect any coast live oaks, ESHAs, or disrupt any current restoration efforts. Figure 6.0 Region of Influence shows the entire region of influence, which extends as far north as the Goleta Slough, east as the edge of the campus lagoon, south as Campus Point, and west 500 ft. past Coal Oil Point Reserve.

6.1 Projects Considered for Cumulative Analysis:

Pursuant to CEQA Guidelines Section 15130 (1)(A), these proposed, approved, and probable future projects listed under Table 6.1 Cumulative Project Impacts shall be considered with the project, as they could compound or increase environmental impacts. All projects listed below would adversely affect an ESHA or restoration site or remove native trees in some way.

Table 6.1 Cumulative Project Impacts

Project Name	Number on Figure F5 (Location)	Size/Units	Land Use/Characteristics	Status
Dos Pueblos O'Shaughnessy (County of Santa Barbara Resource Management Department)	1	18 holes	Golf Course: This pending project would be located about 500 ft. to the west of Coal Oil Point Reserve, a protected natural area, which is part of the Natural Reserve System. Because the pending project is near this restoration site, it is reasonable to believe that construction and grading would cause minor harm to the restoration efforts.	Pending
Ellwood Devereux Regional Plan (St. Athanasius Church Complex Proposed Final EIR)	2	225 acres	Passive Recreational Park: The proposed project would be located on an ESHA and would be maintained as open space. Because it would be maintained as open space, the project's impacts compared to the cumulative impacts are minor because they would faintly disturb an ESHA.	Proposed

Devereux School Master Plan (St. Athanasius Church Complex Proposed Final EIR)	3	20 units/1 acre/ 43,560 sq. ft.	Residential: The Devereux School Master Plan puts 20 dwelling units directly above an ESHA and ESHA Buffer. The conversion of 43,560 sq. ft. of ESHA to residential units will have a considerable effect compared to all projects within the region of influence.	Approved
City of Santa Barbara Airport Facilities Plan (St. Athanasius Church Complex Proposed Final EIR)	4	60,000 sq. ft.	Terminal & Airport Operations: According to the Airport Master Plan, facilities shall include additional parking, runways, taxiways, support facilities, as well as navigational aids. Sections 30230, 30231, and 30233 of the Coastal Act of 1976 require protection of marine resources and estuaries such as those found within the Goleta Slough System. The conversion of 60,000 sq. ft. of a slough system to airport facility structures will have a considerable impact.	Approved
IV Redevelopment (County of Santa Barbara Resource Management Department)	5	N/A	Redevelopment: The approved projects will consist of renovating structures in Isla Vista, Ca. In figure 6.0 Region of Influence, (5) is located in the middle of Isla Vista because redevelopment will be occurring all over. The redevelopment of some structures may be adjacent to ESHAs, disturbing the habitat. The redevelopment may also remove native trees. This would have minimal impacts on the region of influence.	Approved
Sing Warehouse (County of Santa Barbara Resource Management Department)	6	3,000 sq. ft.	Warehouse: The development of the 3,000 sq. ft. warehouse is located on an already developed area, surrounded by an ESHA. Due to the project's small size and location on developed land, construction and use would cause minimal harm to an ESHA.	Approved

Campus Housing: Eastside Residential Hall Additions (San Miguel & San Nicolas) (UCSB 2010 LRDP D-9)	7	246 new units (934 beds)	Student Housing: The plan proposes removing four units and adding parking to provide for the new units at the target ratio of one space per four beds in a location on or nearby the site. Because removal and construction of the units would be directly adjacent to an ESHA to the north, it is reasonable to believe that some of the ESHA habitat would be disturbed from construction.	Will be proposed in the reasonably foreseeable future
Devereux (UCSB 2010 LRDP D-9)	8	125 units/17-acres	Faculty/Staff Residential: The University purchased the former Devereux School site in 2007. This 2010 UCSB LRDP states that the site could serve as temporary space for both housing and academic uses as existing housing complexes are redeveloped and academic buildings are refurbished. Because this site is directly adjacent to the Devereux Slough, it is reasonable to believe that the refurbishing of the school into residential units would disturb that ESHA.	Proposed

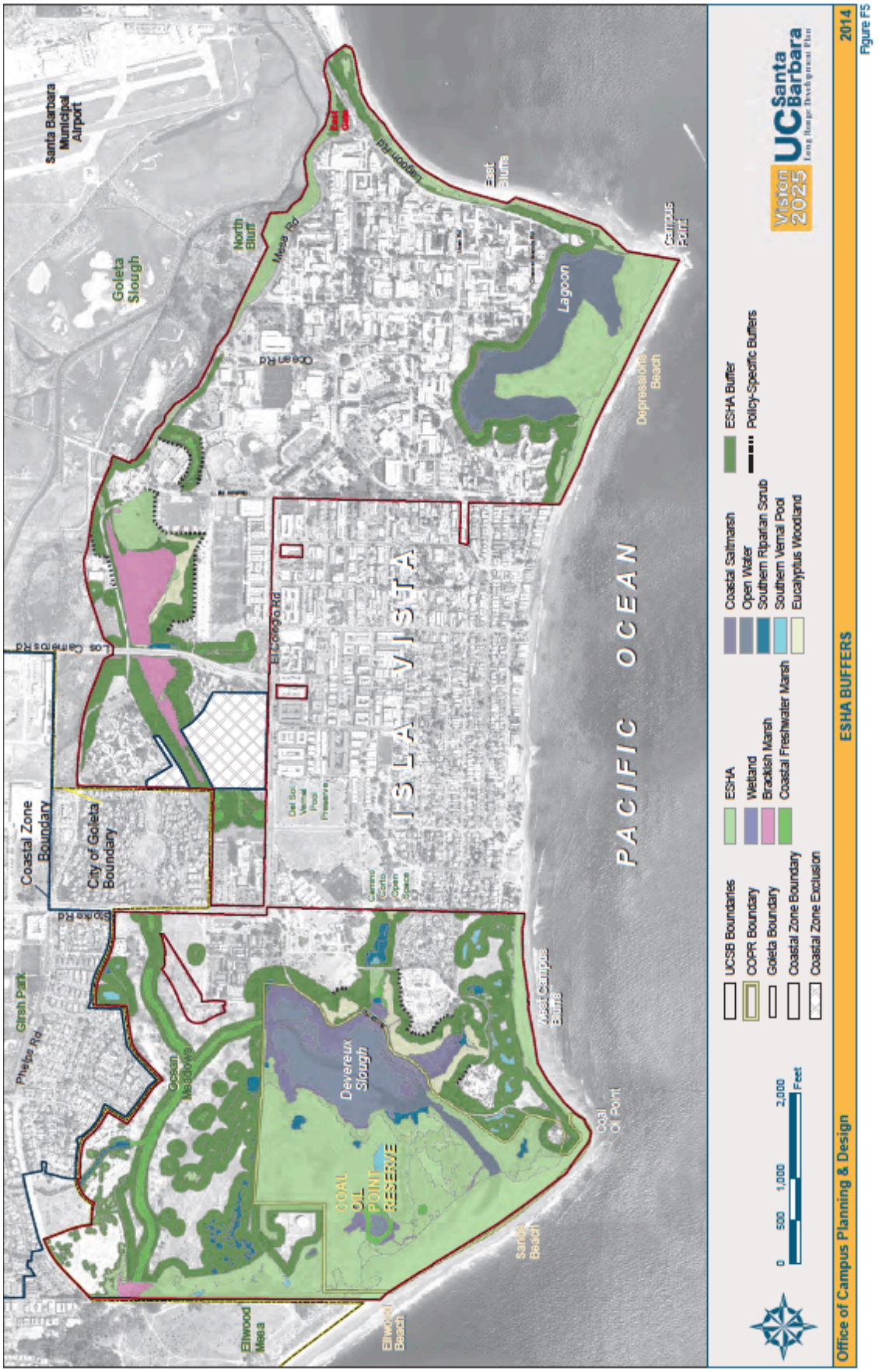
6.2 Analysis of Cumulative Impacts:

The total building coverage on the proposed project site, including covered parking and accessory structures, is 72,816 sq. ft. Thus, the proposed project would remove over 70,000 sq. ft. of an ESHA (Impact BIO-3). Removing ESHAs are very uncommon today; the only other two projects on table 6.1 Cumulative Project Impacts that remove an ESHA are the City of Santa Barbara Airport Facilities Plan and Devereux School Master Plan. The Airport Facilities Plan plans on removing 60,000 sq. ft. of the Goleta Slough, an ESHA. The Devereux School Master Plan plans on building 20 residential units over 1 acre (43,560 sq. ft.). Therefore, the proposed project would contribute to approximately 41.2% of the cumulative impact of directly removing ESHA habitat (Impact BIO-3). One project contributing to 41.2% of the cumulative impact of ESHA removal is a reasonably considerable impact. In addition, other projects including Devereux, Campus Housing, and Dos Pueblos O'Shaughnessy would not completely remove an ESHA, but the grading and construction processes would harm that area. These projects would contribute a minimal amount to the cumulative impacts on biological resources because the ESHA would be able to recover. The construction of Dos Pueblos O'Shaughnessy golf course would require off site grading and would cause a recoverable amount of harm to the restoration efforts on Coal Oil Point Reserve (Impact BIO-3). The fact that the majority of the other projects on the list would harm sensitive habitats (Impact BIO-2) or restoration efforts (Impact BIO-3) decreases the proposed project's relative share of the cumulative impact. However, those sensitive habitats and reserves will recover. Therefore, it is reasonable to believe that the proposed project's impact would be roughly 33% of the total impacts on biological resources in the area of influence. Consequently, development of the individual

proposed project would have a *cumulatively significant impact* on biological resources in the area of influence.

6.2 Potentially Feasible Mitigation Measures:
In attempts to *reduce* the substantial cumulative impacts on biological resources, the following mitigation measures shall be applied. First, in order to *minimize* the impact of removal of greater than 10 percent of native coast live oak, the applicant shall develop a coast live oak restoration plan that includes measures capable of recovering the current coast live oaks or planting new coast live oak trees on a ratio of 5:1 (MM BIO-1). Second, in order to *minimize* the impact of substantially reducing and eliminating native species diversity and abundance and the habitat of these species, the applicant shall follow a Habitat Protection Plan (HPP) and *restore* removed habitat area on a 3:1 ratio (MM BIO-2). Finally, in order to *rectify* the 200 sq. ft. loss of a current restoration site on the proposed project site, the applicant shall develop a new restoration plan in a nearby location (MM BIO-3). Residual impacts would be the ESHA and coast live oaks that the proposed project would not feasibly be able to save. For any residual impacts, the applicant shall pay a *compensation* fee of $200 per every $100ft^2$ of disturbed ESHA to be used for future restoration of ESHAs along with $300 per every coast live oak removed to be used for coast live oak planting.

Figure 6.0 Region of Influence



7.0 Project Alternatives:
CEQA Guidelines Section 15126.6 requires that an EIR describe a range of feasible alternative projects to the proposed project that would still *attain the basic project objectives* while *avoiding or substantially lessening at least one or more of the project's significant impacts*. Each alternative will also be screened for feasibility. CEQA's general definition of feasibility is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Therefore, project alternatives must not cost over 1.5 times the budget for the proposed project, must not take more than 1.5 times the duration of the proposed project to construct, and must incorporate the same or similar technology.

Table 7.0 Project Objectives

Project Objective 1:	To help address the shortage of housing and classrooms due to an influx of students and staff.
Project Objective 2:	To be done in an environmentally sustainable manner with at least LEED Silver certification.
Project Objective 3:	To disturb no sensitive biological or archaeological resources.

Table 7.0-1 Project Impacts

Impact BIO-1:	The construction activity of grading for the proposed road would result in native coast live oak removal.
Impact BIO-2:	The proposed structure would substantially reduce and eliminate native species diversity and abundance along with the habitat of these species.
Impact BIO-3:	The proposed project would interfere with current restoration efforts on the premises.

In attainment with this CEQA Guideline, alternatives evaluated and discussed within this section include: No Project Alternative, Reduced Project Alternative, Off-site Project Alternative, as well as an Environmentally Superior Alternative.

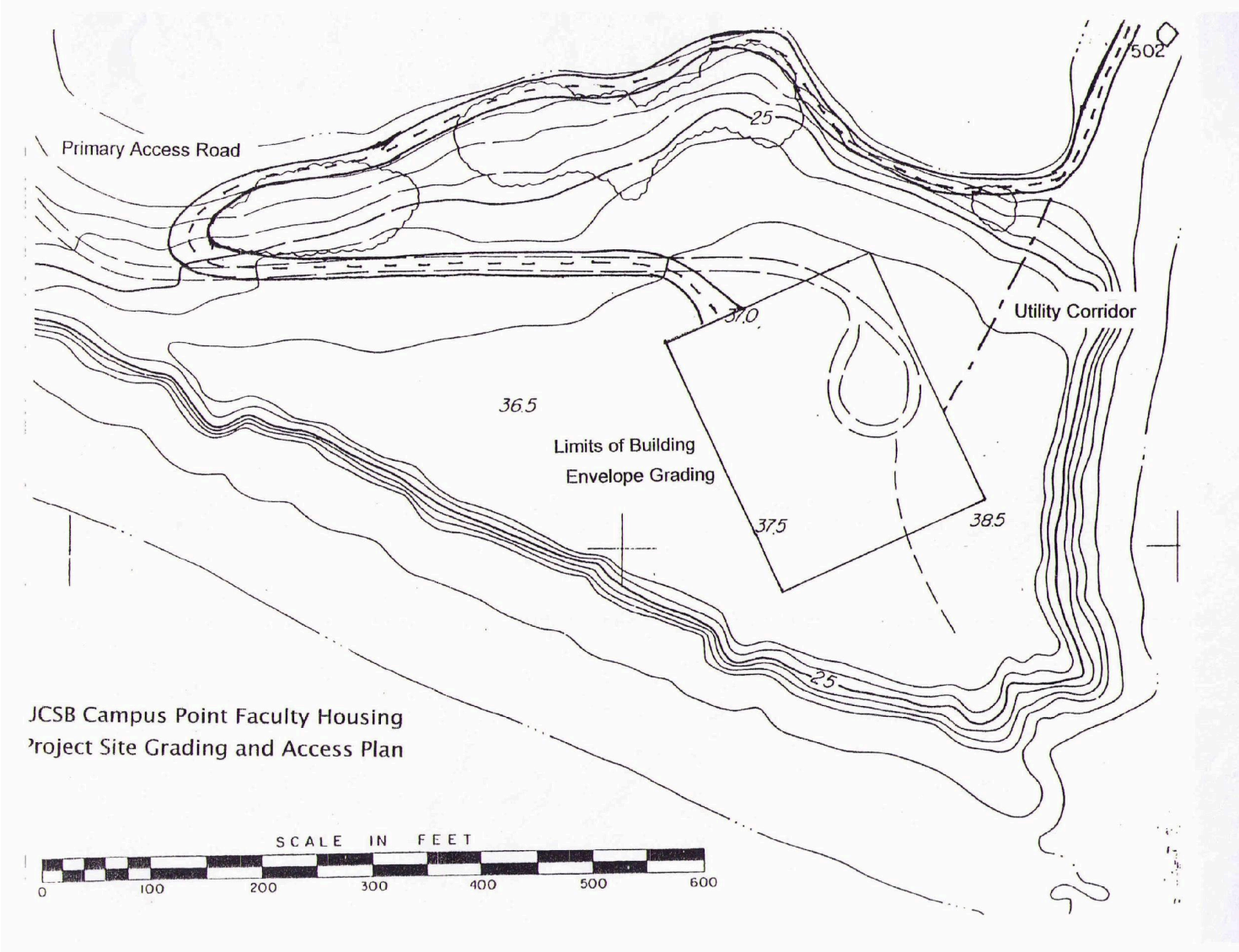
7.1 No Project Alternative:
CEQA Guidelines Section 15126.6 encourages consideration of no project when significant effects of the project might be avoided or substantially lessened. Implementation of the No Project Alternative would result in the retention of the site in its present condition. Under current zoning and available infrastructure, the proposed project site would remain "open space." This alternative would avoid the impacts to biological communities existing on the site, including ESHAs, native salt marsh habitats, and native coast live oaks.

7.1.1 Comparison of Environmental Impacts and Objectives:
One beneficial impact of the proposed project would be the removal of invasive and nonnative species, which would not occur with the No Project Alternative. However, if the project were not to occur, there would be no removal or impact on ESHA/native salt marsh habitat (Impact BIO-2), coast live oaks (Impact BIO-1), and restoration efforts (Impact BIO-3). However, the No Project Alternative would not meet any of the three project objectives.

7.1.2 Feasibility:
This alternative is feasible because it would consist of no payment, time, or technology.

7.2 Reduced Project Alternative:
CEQA Guidelines Section 15126.6 encourages consideration of a reduced project when significant effects of the project might be avoided or substantially lessened. The Reduced Project Alternative would consist of similar components as the proposed project, see Figure 7.2 Reduced Project Alternative Map. First, it would consist of a five-story structure instead of three-story structure. Parking and classrooms would be located on the first three floors and residential townhouse units would be located on the fourth and fifth floors. This would reduce the square footage 40%, from approximately 45,000 sq. ft. to 27,000 sq. ft. Therefore, this would save approximately 18,000 sq. ft. of a current restoration site. This 18,000 sq. ft. of a restoration site includes approximately 10,000 sq. ft. of native salt marsh species and habitat. Grading and construction of the proposed road would remove eight coast live oaks. To minimize the removal of coast live oaks, the access road would not wrap around the lagoon and structure. Instead, to decrease the access road length, the road shall head straight up the slope to the proposed structure and would only remove one out of 30 trees (below the 10% threshold of significant impacts). Minimal grading would be required to make the slope accessible for vehicles. Figure 7.2 Reduced Project Alternative Map illustrates the new route for the access road and reduced size of the structure.

Figure 7.2 Reduced Project Alternative Map



7.2.1 Comparison of Environmental Impacts and Objectives:
One beneficial impact of the proposed project would be the removal of nonnative and invasive species, which would be reduced with the Reduced Project Alternative. On the other hand, adverse impacts associated with the proposed project overall are much more than the Reduced Project Alternative: Removal of eight coast live oaks, reduction of approximately 45,000 sq. ft. of a current restoration site and native salt marsh species and habitat within that are substantial impacts. The Reduced Project Alternative would save seven coast live oaks by rerouting the proposed access road and save 18,000 sq. ft. of a restoration site and approximately 10,000 sq. ft. of salt marsh species and habitat within that compared to the proposed project. Therefore, it would reduce the coast live oak removal (Impact BIO-1) to below the significant threshold of 10%, but would not decrease the impact of removal of a native salt marsh habitat (Impact BIO-2) and a restoration site (Impact BIO-3) to less than significant. This Reduced Project Alternative and proposed project would both meet two of the three project objectives: (1) to help address the shortage of housing (23 dwelling units) and classrooms (approx. 12 rooms) due to an influx of students and staff and (2) to be done in an environmentally sustainable manner with at least LEED Silver certification. However, both projects would not meet the last project objective because they would both disturb sensitive biological resources.

7.2.2 Feasibility:
The Reduced Project Alternative would reduce the grading and construction process for the proposed access road. However, building the structure to five stories as opposed to three would add additional time to the construction process. These effects would cancel themselves out and construction process would take around the same amount of time. Cost of the proposed access road would be decreased due shortening the route and decreasing the amount of grading needed. However, cost would be slightly more for the five-story building due to more permits and the use of more technology to ensure it is structurally sound. Though slightly more technology is used to make a five-story building instead of a three-story building, the technology is similar. Therefore, because cost, duration, and technology of both the proposed project and Reduced Project Alternative should be similar, this Reduced Project Alternative is screened *feasible*.

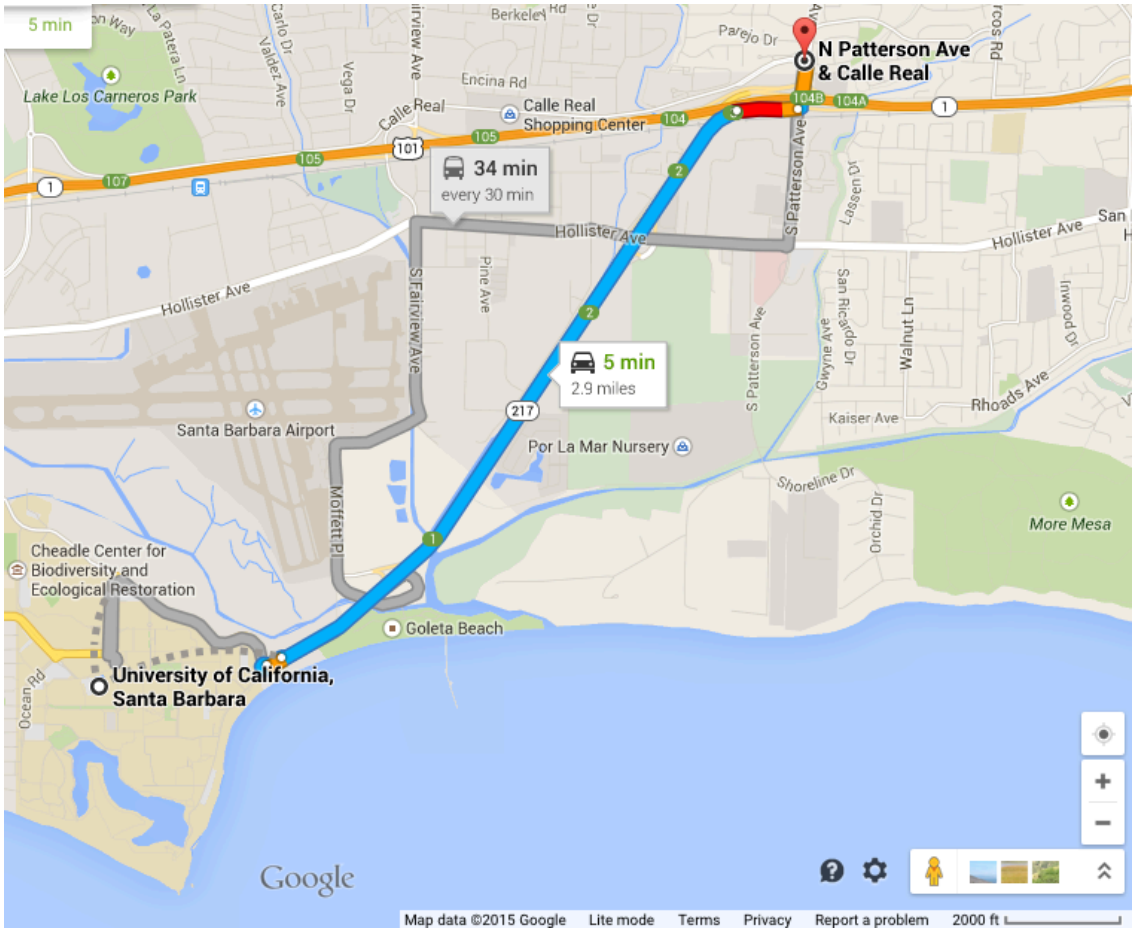
7.3 Off-site Project Alternative:
CEQA Guidelines Section 15126.6 encourages consideration of an alternative site in a nearby location when significant effects of the project might be avoided or substantially lessened. The Off-site Project Alternative would be located at Georgi-Calle Real/North Patterson Avenue Corner. Figure 7.3 Off-site Project Alternative Map shows the location of this project alternative. According to the Goleta Valley Community Plan EIR, this 1.53-acre (66,646.8 sq. ft.) parcel is in an urban area and is currently planted with orchards. The proposed 3-story project requires 44,691 sq. ft. for its structures and 28,125 for its roads/parking/walkways, totaling 72,816 sq. ft. However, the Off-site Project Alternative would not require the access road, decreasing the needed square footage to approximately 66,000. North Patterson Avenue, which is a four-lane major roadway, borders the site to the east. To the south is a commercial self-storage complex. Residential uses, located to the north and northeast and to the west are within the City of Goleta. A beneficial aspect of moving the proposed project to this site is that it is already surrounded by a single-family residential development, which would seem appealing because it is reasonable to believe that residents would prefer to be surrounded by other residents, instead of in the middle of a university main campus. Unfortunately, most undergraduate students would have a further distance to travel to class, seeing as the majority of undergraduate students live in the bordering residential community, Isla Vista. Therefore, it would be reasonable to make the 12 units graduate classrooms because graduate

students tend to live in Goleta, Ca. The site is generally flat and does not contain any significant visual resources such as surface waters, slopes, or other significant features. In addition, no key viewpoints or public vistas are located in proximity to the site (Goleta Valley Community Plan EIR 4.3-13). This site is approximately 3 miles away from UCSB's main campus and would be approximately a 5-minute drive. Figure 7.3 Off-site Project Alternative Map illustrates where the Off-site Alternative is located compared to UCSB Main Campus and the proposed project site.

7.3.1 Comparison of Environmental Impacts and Objectives:

One beneficial impact of the proposed project would be the removal of invasive and nonnative species, which would not occur with the Off-site Project Alternative. However, alternative impacts associated with the proposed project are much more than the Off-site Project Alternative: Removal of eight coast live oaks (Impact BIO-1), reduction of approximately 45,000 sq. ft. of a current restoration site (Impact BIO-3) and native salt marsh species and habitat (Impact BIO-2) within that are substantial impacts. The Off-site Project Alternative would not cause any of these impacts. The Off-site Project Alternative would also meet all three project of the objectives: (1) to help address the shortage of housing (23 dwelling units) and classrooms (approx. 12 rooms) due to an influx of students and staff, (2) to be done in an environmentally sustainable manner with at least LEED Silver certification, and (3) to not disturb any sensitive biological or archaeological resources. The proposed project would only meet two of these objectives.

Figure 7.3 Off-site Project Alternative Map



7.3.2 Feasibility:
Vegetation removal on the Off-site Project Alternative would be required because it is currently planted with orchards. However, the proposed project is planted with coast live oaks as well as native and non-native species, so vegetation removal would be required there as well. Because the parcel of land is generally flat, grading would not be required, decreasing duration of construction. Construction of a proposed access road would also not occur in the Off-site Project Alternative, overall decreasing the amount of time required for construction. In addition, the same technology would be used for the proposed project and Off-site Project Alternative. Not having to grade the parcel and construct an access road would reduce the cost of the Off-site Project Alternative. Thus, cost of the Off-site Project Alternative would overall be cheaper. Because duration and cost of construction is reduced and technology of the proposed project and Off-site Project Alternative are similar, this alternative project is screened *feasible*.

7.4 Environmentally Superior Alternative:
Based on Table 1.1 Comparison of Alternative Impacts, the No Project Alternative and Off-site Project Alternative both reduce all of the impacts (Impact BIO-1, Impact BIO-2, and Impact BIO-3); however, the No Project Alternative does not meet any of the project objectives. Thus, the Off-site Project Alternative is the Environmentally Superior Alternative because it has the highest number of reduced impacts relative to the proposed project while still meeting all of the project objectives.

Table 1.1 Comparison of Alternative Impacts

Impact	Proposed Project	No Project Alt.	Reduced Project Alt.	Off-site Project Alt.
BIO-1: Native coast live oak removal	Class II	Class III (-)	Class III (-)	Class III (-)
BIO-2: Removal of native salt marsh species and habitat	Class II	Class III (-)	Class II (-)	Class III (-)
BIO-3: Interference of current restoration efforts	Class II	Class III (-)	Class II (-)	Class III (-)

Note:

Class I: Significant and unmitigable
Class II: Significant but can be mitigated to less-than-significant
Class III: Insignificant
Class IV: Beneficial
Impacts with (=) would be equal to the project
Impacts with (-) would be equal to the project
Impacts with (+) would be equal to the project