Final Environmental Impact Report

Goleta Point Faculty Housing/Classroom

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1.0 INTRODUCTION

This Final Environmental Impact Report (EIR) addresses the proposed Goleta Point Faculty Housing/Classroom project located on the southeastern edge of the University, California Santa Barbara (UCSB) campus. The proposed project seeks to provide attractive on-campus faculty housing and additional classrooms. The purpose of this EIR is to identify the significant effects on the environment of a project, identify alternatives to the project, and indicate the manner to which such significant effects can be mitigated or avoided (CEQA Guidelines, 21002.1). A Notice of Preparation (NOP) was distributed for a 30-day agency and public review period on January 6th, 2025. Application Response Letter #1 was submitted to the applicant on January 13th, 2025, requesting additional information be provided on the proposed project. The EIR assists in the environmental review process for Santa Barbara County and the Coastal Commission. This EIR has been prepared pursuant to CEQA Guidelines 15161 -- examining all changes in the environment as a result from the development of the proposed, including planning, construction, and operation.

1.1 EIR Content

- **Section 2.0 Project Description**
  - Describes project location, objectives, technical and economic characteristics, related environmental review requirements required by federal, state, or local laws
- **Section 3.0 Environmental Setting**
  - Describes baseline physical environmental conditions within vicinity of project.
- **Section 4.0 Project Impacts**
  - Classifies the significance of potential construction or operation related impacts and describes respective feasible mitigation measures.
- **Section 5.0 Cumulative Impacts**
  - Describes the potential significance of multiple compounding effects on an environmental resource from other project sites in the region of influence.
- **Section 6.0 Project Alternatives**
  - Describes a range of reasonable alternatives to the project that would attain most basic objectives but substantially lessen significant effects of the project.
    - No Project Alternative: No project would be constructed.
    - Reduced Project Alternative: Faculty units/classroom size would be reduced.
    - Reconfigured Project Alternative: Includes alternate access road location.
    - Off-Site Project Alternative: Relocates project site to northeastern edge of UCSB campus, identified as the **Environmentally Superior Alternative**
- **Section 7.0 Public Comments and Responses**
  - Provides relevant comments from the public regarding the Draft EIR and changes made in response to public comments.

- Revisions to the DEIR are presented in the FEIR (additions = underlines; deletions = strikeouts)

1.2 Impact Summary

Table 1-1 summarizes Significant and Unavoidable (Class I) and Significant but Feasibly Mitigated to Less than Significant (Class II) impacts on the environmental setting from the proposed project and cumulative impacts resulting from the proposed project.

Table 1-1. Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Class I: Significant and Unavoidable

Impact	Mitigation Measure	Residual Impact
Impact WQ- 2: Construction activity, including substantial grading, could alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on-site.	**MM WQ-2:** To minimize the increase in substantial on-site erosion and siltation, the applicant shall develop an Erosion and Sediment Control Plan (ESCP), detailing water contamination prevention practices.	Significant and unavoidable

Class II: Significant but Feasibly Mitigated to Less than Significance

Impact WQ - 1: Runoff from construction sites has the potential to violate water quality standards and substantially degrade surface or ground water quality.	**MM WQ-1:** The applicant shall develop a Storm Water Pollution Prevention Plan (SWPP) that includes Best Management Practices (BMPs) designed to keep contaminants and sediments onsite.	Significant but feasibly mitigated to less than significance
Impact WQ-3: The addition of impervious surfaces would increase discharge of pollutants into an "impaired" waterbody during project operation, resulting in a potentially substantial impact on water quality and increase the amount of impervious	**MM WQ-3:** To reduce the discharge of pollutants from on-site impervious surface during project operation, the applicant shall prepare a Storm Water Management Plan (SWMP) that includes Best Management Practices (BMPs).	Significant but feasibly mitigated to less than significance

surfaces on site to 25% or more.		
Impact WQ- 4: The proposed project would potentially alter the drainage pattern of portion of the site located within a 100-year flood plain.	**MM WQ -4:** To prevent flooding on-site, the applicant shall provide a retention basin designed to retain, infiltrate and/or recharge all runoff water onsite, and maintain contaminants as part of the Storm Water Management Plan (SWMP).	Significant but feasibly mitigated to less than significance.
Impact CUM-WQ: The proposed project and other projects within the region of influence would cumulatively increase storm water pollutant runoff into an "impaired water body".	**MM CUM-WQ:** To reduce the discharge of pollutants from on-site impervious surface during project operation, the applicant shall prepare a Storm Water Management Plan (SWMP) that includes Best Management Practices (BMPs).	Significant but feasibly mitigated to less than significance.

2.0 PROJECT DESCRIPTION

The Project Description provides a context for proposed activities that have potential for environmental impacts, including construction and operation. This section is based on the Project Application (12/15/24), Response to Incomplete Letter (1/20/25), and the staff's site analysis (1/13/25).

2.1 Project Objectives

The Goleta Point Faculty Housing/Classroom Project seeks to convert the existing Open Space to Institutional/Residential Space, combining faculty residential units with educational classroom space. The three-story, 36-feet tall structure located at Campus Point would contain 23 residential units with 1, 2, or 3 bedrooms each and 9,510 square feet for approximately 12 classrooms. The proposed project would be located within a 10–15-minute walk from other instructional facilities, providing a reasonable commute time for students. Parking and classrooms would be located on the first floor while residential townhouse units would be on the second and third floor.

Since its relocation to Goleta in 1944, the University of California, Santa Barbara (UCSB) has employed or educated 14 Nobel Prize laureates. As Santa Barbara County real estate costs continue to rise, potential Nobel-quality faculty are potentially being lost to other universities with lower costs of living. An increase in attractive housing would attract more distinguished faculty, improving the quality of teaching at UCSB. An increase in the overall educational standard would further serve the public of California, especially underrepresented groups; UCSB ranks as one the top Hispanic-Serving Institutions in the country. Thus, project objectives include

- Improving educational quality through attractive faculty housing
- Maintaining accessible classrooms such that students can commute within 10-15 minutes of campus by walking
- Providing 23 residential units for faculty housing
- Promoting academic excellence through the addition of 12 classrooms

2.2 Project Location

The 1,055-acre UCSB campus is located in southern Santa Barbara County and west of Goleta. North of campus lies the Santa Barbara airport and the city of Goleta. Campus Point, the site location indicated in Figure 2-1, is located on the bluffs on the southeastern edge of Campus and is directly adjacent to the Campus Lagoon. Campus Point is approximately 40 feet above sea level. Campus Point is currently designated as Open Space (UCSB LRDP 2008).

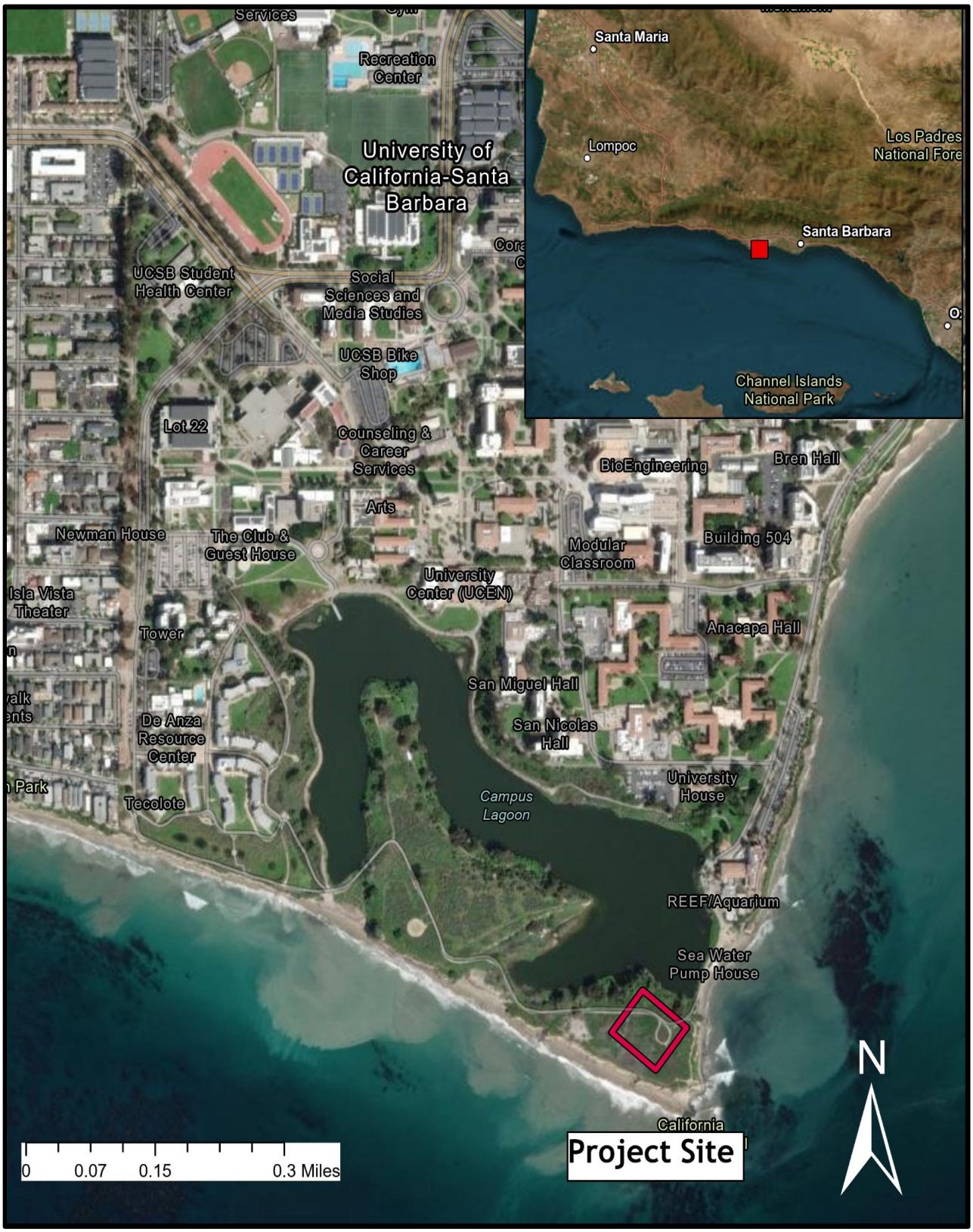


Figure 2-1 Regional location and Project Vicinity of Goleta Point Faculty Housing/Classroom

2.3 Surrounding Land Uses

The proposed project site has many relevant surrounding land uses. The Santa Ynez Mountains are to the north. Isla Vista, an unincorporated city that acts as the primary off-campus student housing at UCSB, lies directly west of Campus. The Pacific Ocean lies to the south of Campus. The primary road to Campus Point is Lagoon Road, which lies to the east along the beach. The Research, Experience, and Education Facility (REEF) is located at the end of Lagoon Road (see Figure 2-3). The Campus Point Pump House, a seawater filtration facility, is located along the Campus Point path adjacent to the beach (see Figure 2-2). A trail passes through Campus Point and around the Lagoon that is a popular source of recreation. Campus Point Beach is also popular among patrons for surfing, picnicking, and hiking. The closest student housing to the project site are Santa Cruz Hall and San Nicolas Hall, which are located to the north across the Lagoon.

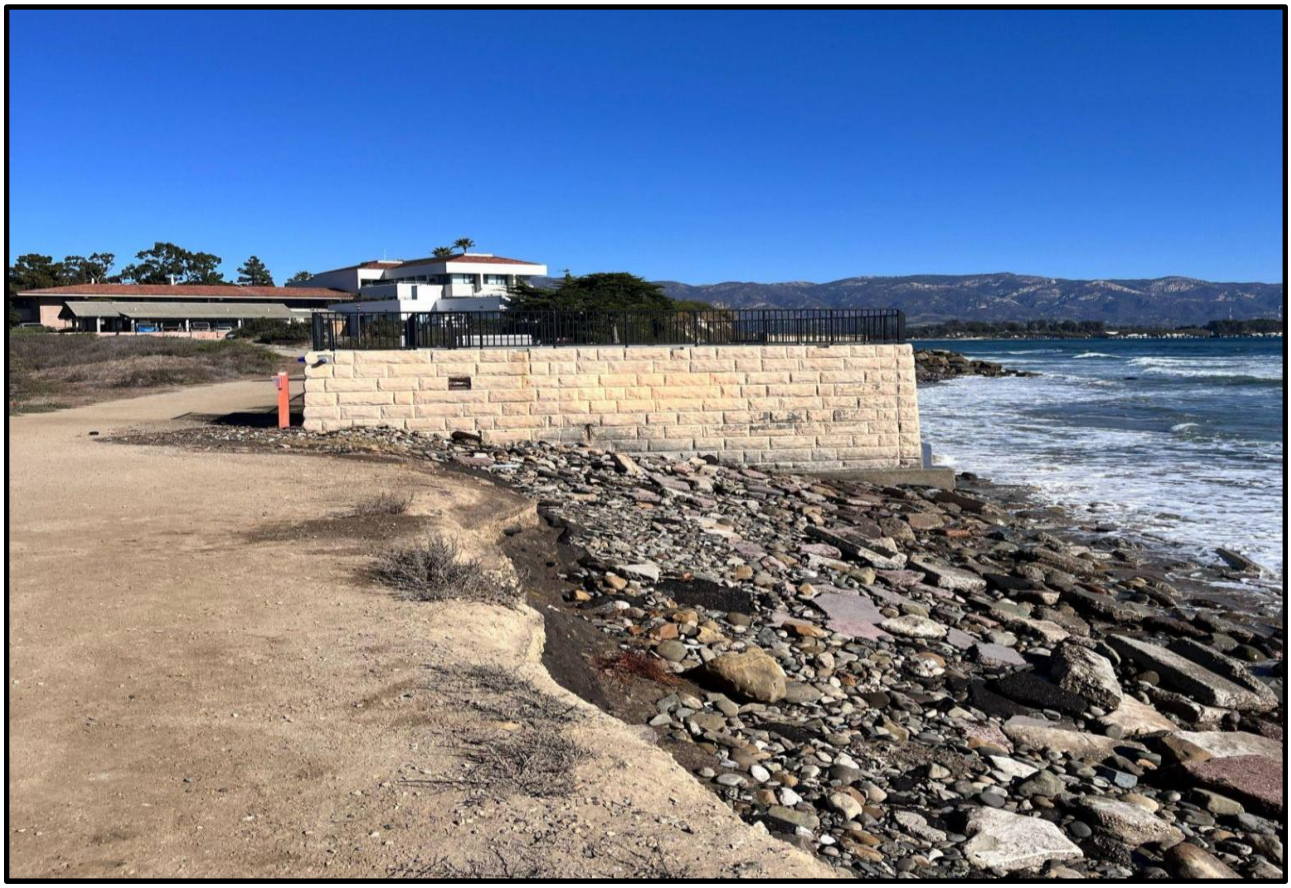


Figure 2-2. Campus Point Pump House, Looking Northeast (1/5/2025)

Figure 2-3. REEF Aquarium and Marine Science Building, looking Northeast (1/13/25)

2.4 Project Construction

Total construction would occur over a 10-month period. Grading would occur over a 4-month period. Condominium construction would occur over a 6-month period. Standard graders, dump trucks, backhoes and other standard equipment would be used. Construction would enter through UCSB Mesa Road. The total area of the project, excluding access road extension, would be approximately two acres.

Grading, including excavations and filling, would be balanced on-site. It is reasonable to assume soil removal would exceed 20,000 cubic yards. The maximum vertical height of cut and fill slopes is estimated to be no greater than 6 feet, according to the applicant. All existing building materials on-site such as asphalt would be hauled off-site during construction. The applicant predicts that the removal of trees is unnecessary. All trees would be fenced off to prevent damage during construction.

It is reasonable to assume the extension of the Lagoon Road is required to have a 24-foot width. Point A on Figure 2-4 and Figure 2-5 indicates an area that would reasonably require a 22-foot cut into the mesa to support a 24-foot road. To keep consistent with Lagoon Road, asphalt would be used for the extension. Asphalt would also be used for parking spaces. Lighting along roadways would be limited to streetlamps. Sidewalks are not expected because of low pedestrian and vehicular traffic. It is reasonable to assume a bike path would be necessary for students who bike to class to keep consistent with the extensive UCSB bike paths.

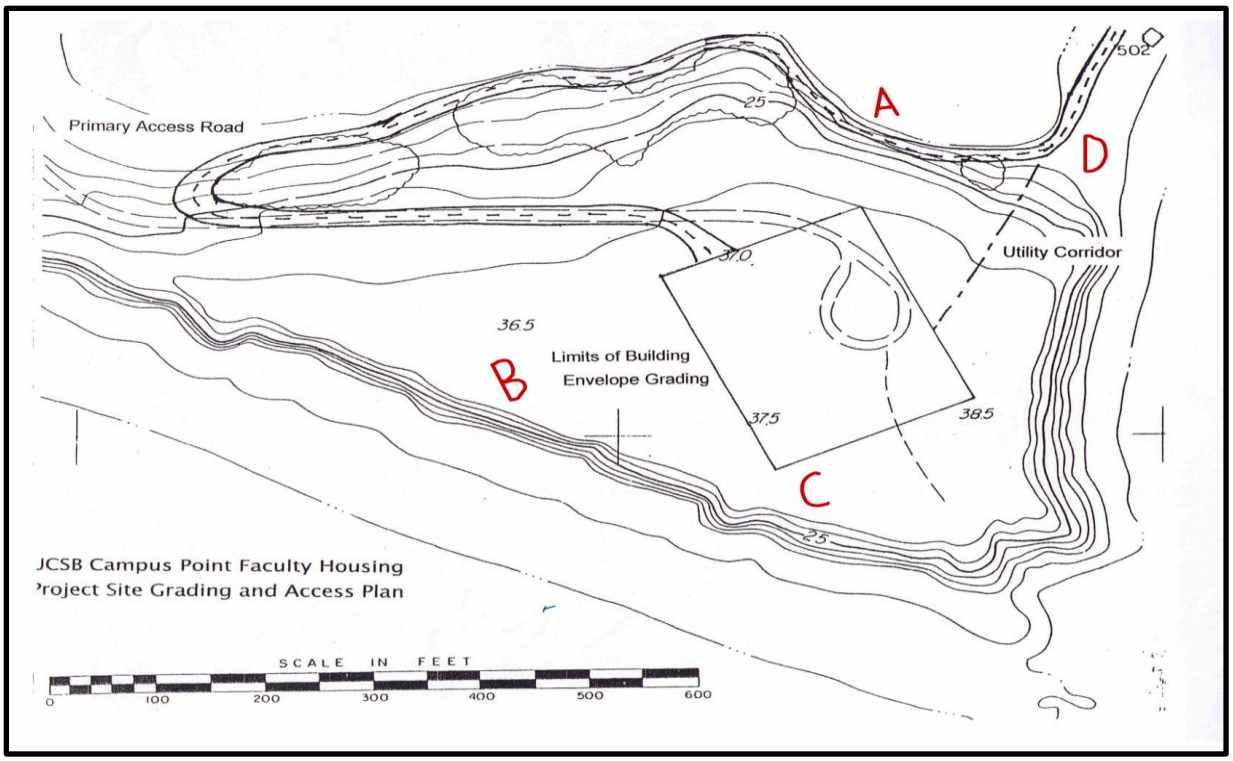


Figure 2-4 Project Site Grading and Access Plan

Figure 2-5. Proposed Lagoon Road Extension Section, Facing South (1/13/25)

2.5 Project Operation

2.5.1 Architecture

The proposed project is estimated to be around 36-feet tall. The 1-bedroom units would be occupied by a single faculty member. The 2-bedroom and 3-bedroom units would have an average occupancy of 2.0 and 3.5 persons per unit, respectively. Residential population is estimated to be between 60-80 people. Use of classroom areas would be designated by the University. The capacity of each classroom is 30 students and an instructor. The third-story and second-story of the townhouse are both shown in Figure 2-7. The design of the first-story of the townhouse are indicated by Figure 2-8. However, it is reasonable to assume there would be bike parking or lockers which are currently not shown. The color of the structure and materials would be similar to those found in Spanish Revival architecture (see Figure 2-6). Such traits include white-stucco walls and red-tile roofs found in downtown Santa Barbara.

2.5.2 Access and Parking

The parking would be located inside the main proposed building on the first floor (see Figure 2-7). The extension of Lagoon Road would traverse alongside the Lagoon and wrap around directly to the proposed building (see Figure 2-4). The width of the proposed road would be 24-feet and the materials would be asphalt. It is reasonable to assume a bike path would be placed along the outer edge of the access road. The road would be built a minimum two-feet above the 100-year floodplain surrounding the Lagoon.

2.5.3 Drainage

Existing Lagoon drainage (see Figure 2-9) would remain intact. It is reasonable to assume additional drains would be necessary to compensate for the increase in impervious surfaces in the area. The proposed road extension would be angled away from the lagoon so minimal runoff flows into the lagoon. Drainage adjacent to parking spaces and the proposed roadway would be engineered with catch basins and silt traps to minimize untreated runoff. No bioswales are proposed. Drainage around the bluff would include devices at the base of the drainage pipes to reduce potential scouring.

2.5.4 Landscaping

Landscaping is estimated to be 1,355-square feet. While no landscaping plan has been provided, it is reasonable to assume a mix of taller trees would be placed adjacent to the project site. Proposed trees include Canary Island palm trees, which grow up to 50-80 feet, and Norfolk Island pine, which grows up to 60-80 feet tall. Additional shrubbery would include lavender and Mexican sage. Vegetation around the Campus Lagoon that may potentially be removed includes exotic rip-gut brome grass (Bromus diandrus), wild radish (Raphanus satirus), scarlet pimpernel (Anagallis arvensis), Eucalyptus species, sheep sorrel (Rumex acetosella) and iceplant.

It is reasonable to assume an emphasis on low-water use, drought-tolerant plants would be used for landscaping. During construction, iceplant would be removed as necessary and native plants added to compensate for potential losses.

2.5.5 Utilities

No utility lines currently extend to the project site. Goleta Water District (GWD) and Goleta Sanitary District are expected to approve installation of utilities. The extension of the utilities from the REEF Building and Marine Science Lab would be placed along the roadway shoulder, then traverse the site in a way to minimize grading, as indicated by Point D in Figure 2-4. There is a singular existing water line that is extended from Lagoon Road to the project site as well as a fire hydrant. All proposed utilities like sewer lines would be underground and would follow the access road up to the units as identified in Figure 2-4.

2.5.6 Hours of Operation and Population

Dependent on the specific size of the 23 proposed residential units, it is reasonable to assume the maximum capacity of the faculty housing ranges from 60 to 80 persons. The maximum capacity for classrooms would be approximately 370 persons. The classrooms would not be used at night or on weekends to prevent conflict with faculty residences.

2.5.7 Lighting

Overall, exterior lighting for the proposed project would be low intensity, although specific lighting designs have not yet been designated. Lighting alongside the proposed lagoon road would be limited to city-required streetlamps. It is reasonable to assume no extra security lights are anticipated because of the security fence placed around the perimeter of the proposed project. Lighting for the addition of walking trails would be required.

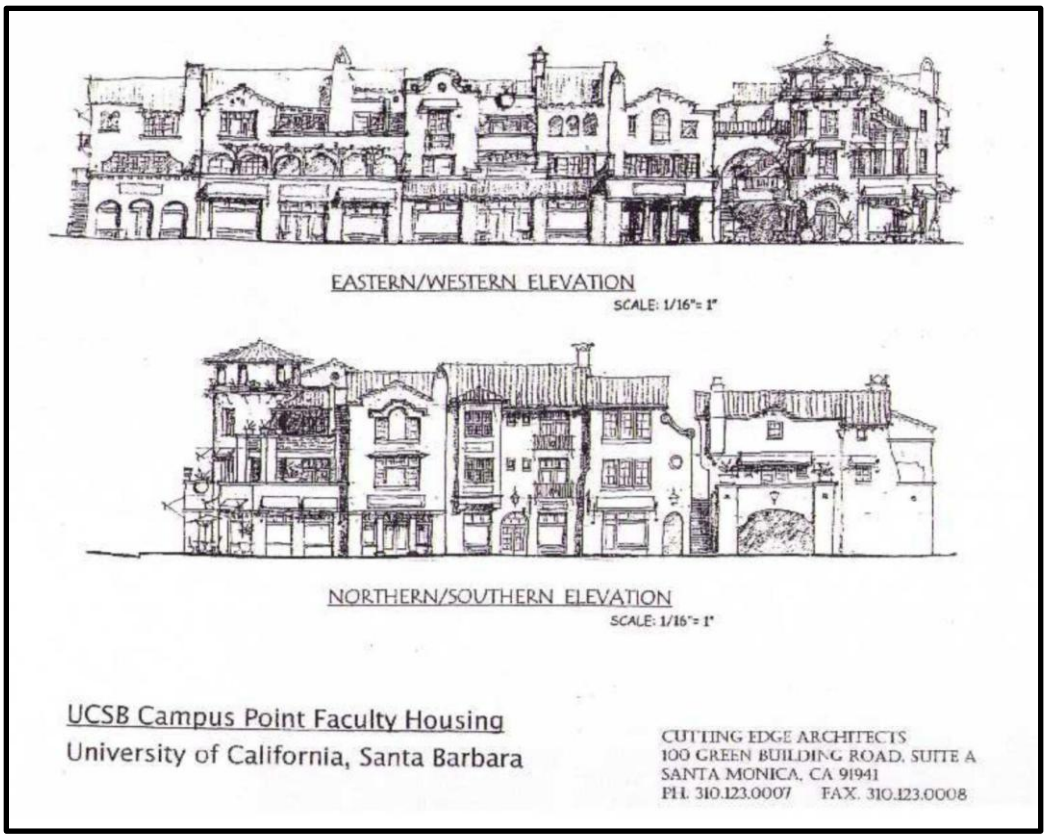


Figure 2-6 Architectural Elevation for UCSB Campus Point Faculty Housing

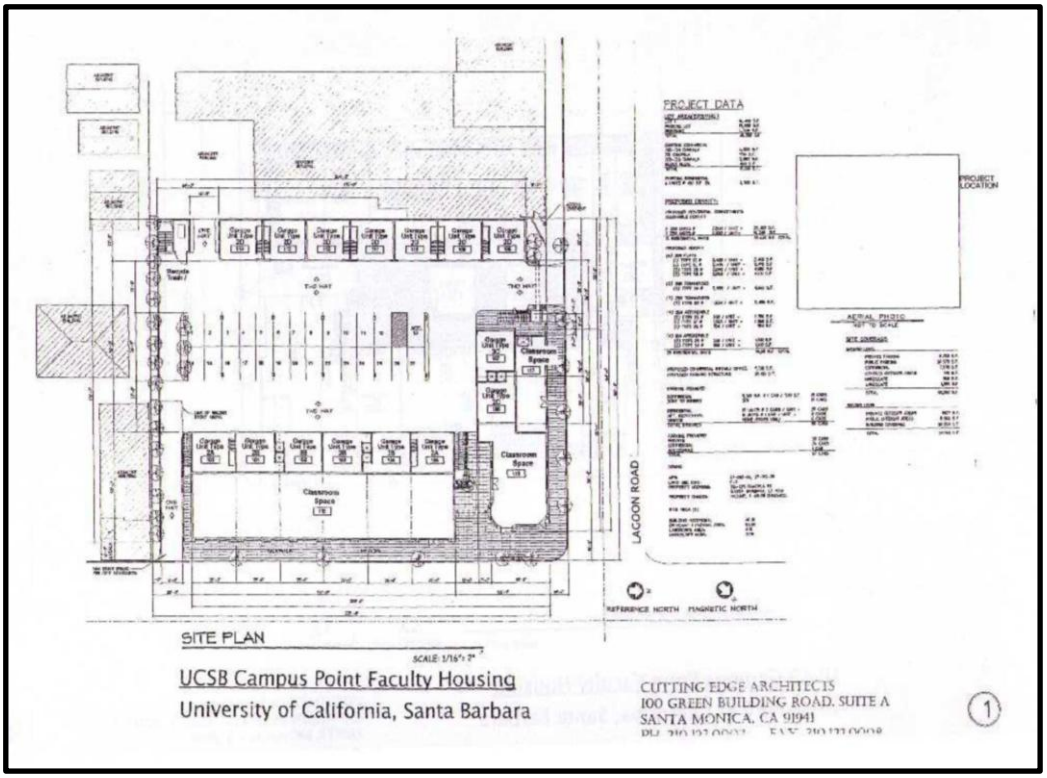


Figure 2-7 First Floor Plan of UCSB Campus Point Faculty Housing

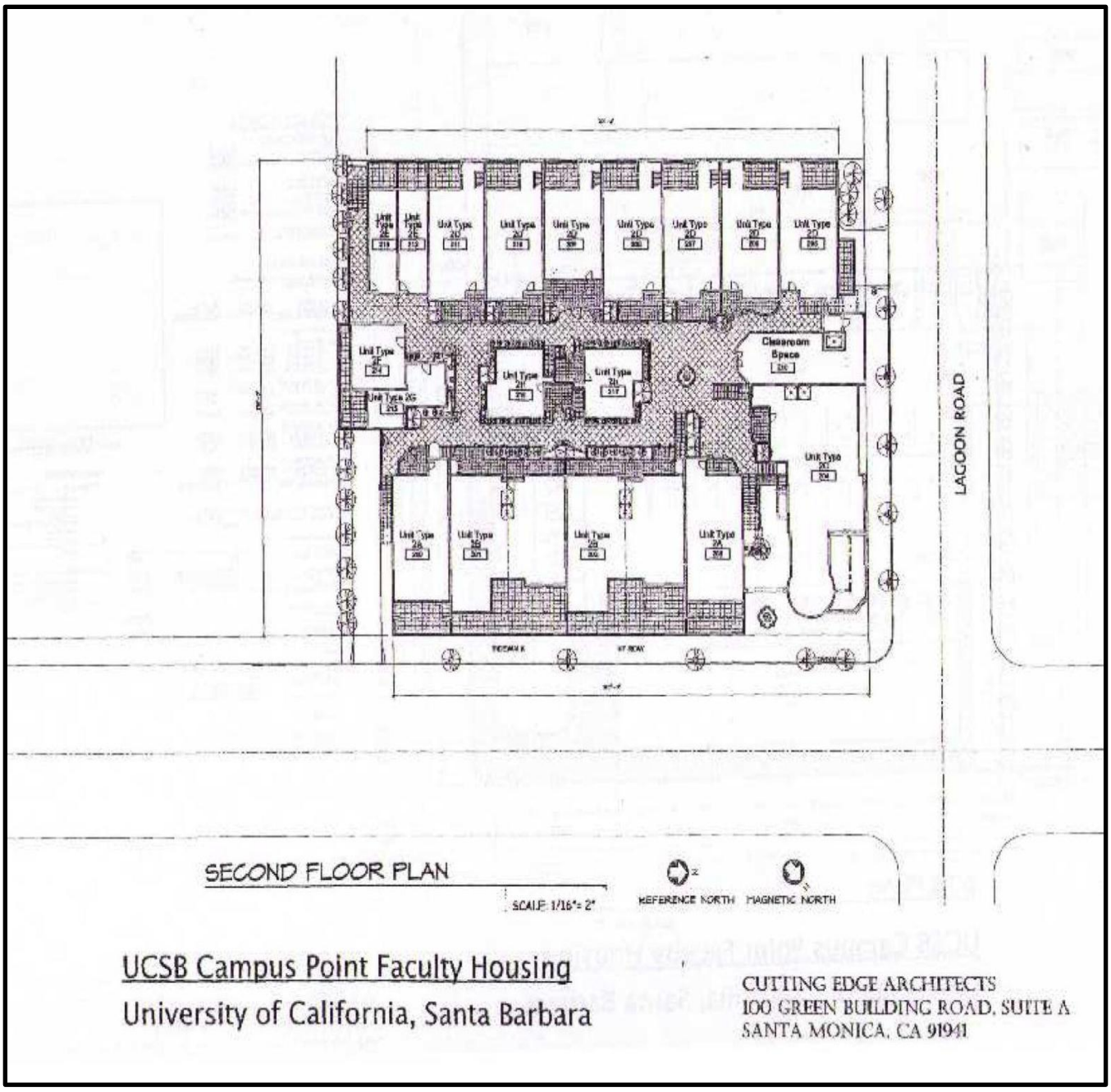


Figure 2-8 Second Floor Plan of UCSB Campus Point Faculty Housing

Figure 2-9. Lagoon/Stormwater Drainage to Ocean, Facing East (1/13/25)

3.0 ENVIRONMENTAL SETTING

This section describes the existing physical environmental characteristics of the hydrology and water resources where the proposed project would be constructed and in the immediate vicinity. Topics include drainage, flooding, water quality, and regulatory compliance.

3.1 Surface Water Resources

The UC Santa Barbara campus lies in the Goleta Slough Watershed (see Figure 3-1). Surrounding watersheds include Ellwood Canyon, Glen Annie Canyon, East Fork Maria Ygnacio Creek and San Roque Canyon (see Figure 3-1). A watershed is a delineated region that channels rainfall to creeks, streams, and rivers to eventual outflow points such as the Pacific Ocean. The major drainage sites at UCSB are Devereux Slough, Stork Wetlands, and the Campus Lagoon.

3.1.1 Campus Lagoon

The 31-acre Campus Lagoon is located in the southern region of the Main Campus adjacent to the Pacific Ocean. The Lagoon was created in 1942 through the construction of a berm along its western edge; The UCSB Long Range Development Plan designated the water body as an environmentally-sensitive habitat (UCSB 2008). Water elevation varies from four to seven feet above sea level. An overflow weir to the west of the Lagoon and an outfall culvert at the eastern end control its maximum water level (see Figure 3-2). The primary source of water supporting the lagoon is the seawater discharged from the UCSB Marine Science Laboratories that originates from the Campus Point Pump House (see Figure 2-2). Receiving water input from eight storm drains, surface flows, and seawater from the marine science laboratories and aquaria, the Lagoon's brackish nature provides essential habitat for riparian and freshwater wetland ecosystems (CCBER 2016).

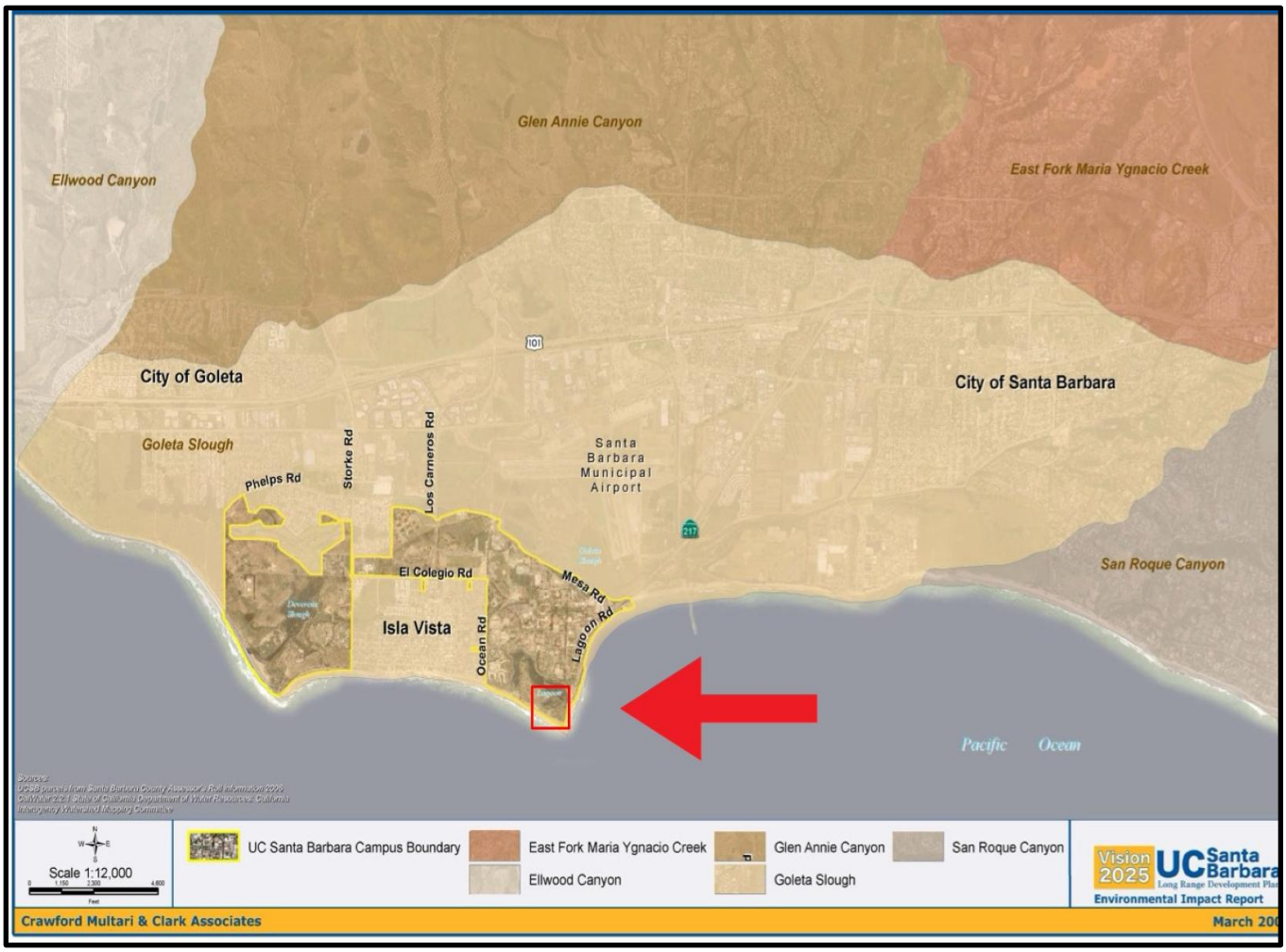
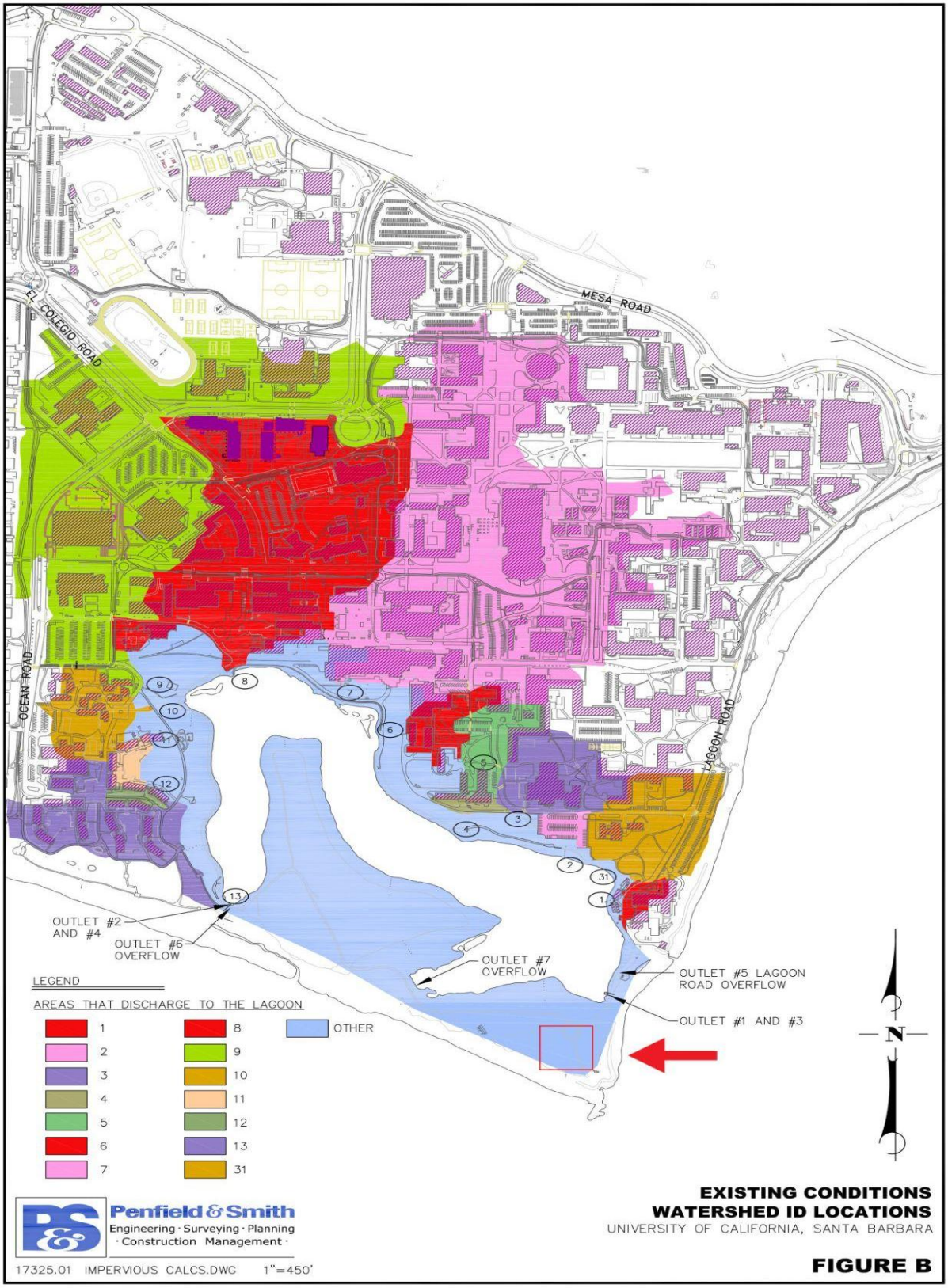


Figure 3-1. Regional Watersheds. Red arrow indicates project site (UCSB LRDP 2008)



3-2. Watershed and Drainage Outlet Locations (Penfield & Smith 2008)

3.2 Stormwater Drainage and Infrastructure

3.2.1 Precipitation

UC Santa Barbara has received a mean yearly rainfall of 18.5 inches since 1942. Due to its mediterranean climate, the region has large inter-annual and intra-annual precipitation variance (see Figure 3-3), receiving 33 inches in 2022 and 7 inches in 2014 (Santa Barbara County Flood District 2024). During the wet years, extended precipitation events can create floods causing rapid rise in stream flow.

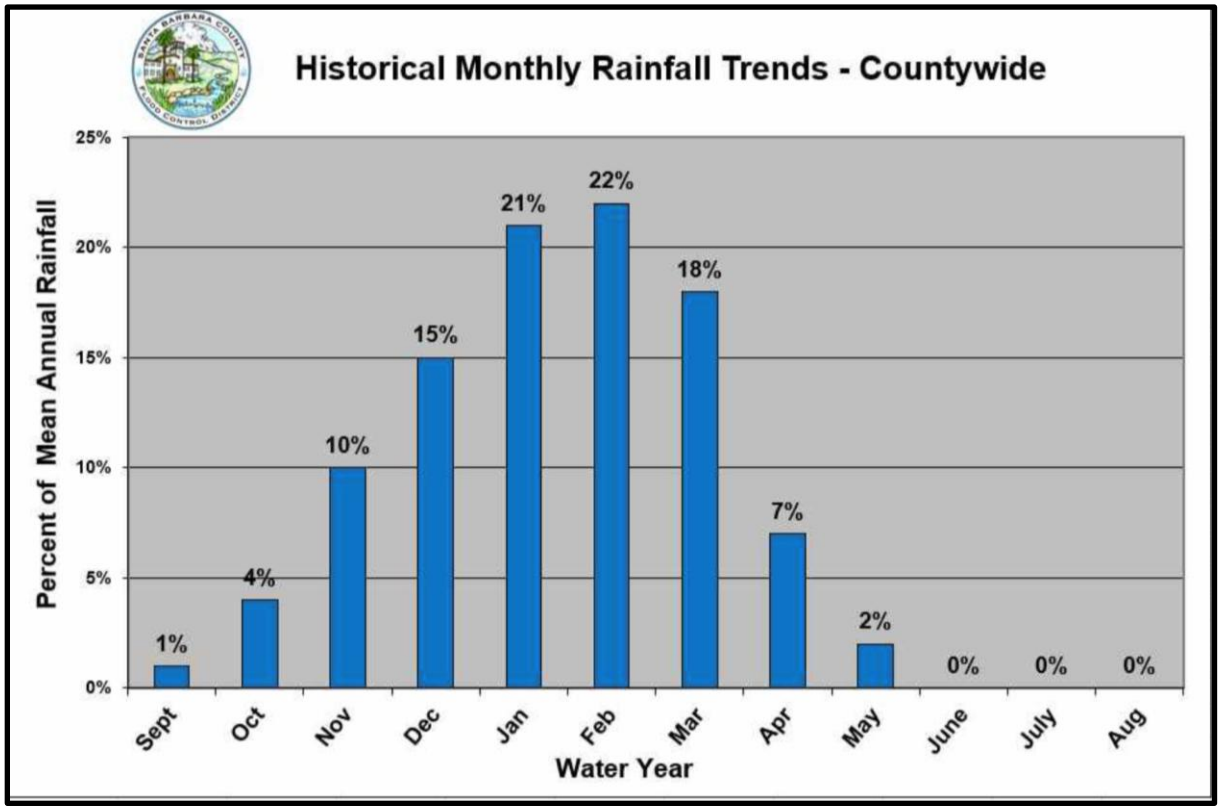


Figure 3-3. Monthly Distribution of Rainfall in Santa Barbara County (Santa Barbara County Flood Control District 2024)

3.2.2 Drainage

The proposed project site drains directly to the Campus Lagoon (see Figure 3-4). The 2008 Campus Lagoon Hydrology Report identifies there are six storm drain outlets that directly discharge water directly to the Pacific Ocean (see Figure 3-2) (Penfield and Smith 2008). Three outlets are located along the proposed Lagoon Road extension and one outlet is located to the east of the project site. Outlets 1 and 3 are located underneath the proposed Lagoon Road extension (see Figure 3-2, 2-9). Drainage types include catch basins and drop inlets (see Photos 5 and 6).

In 2008, the California Regional Water Quality Control Board identified the following conditions that indicate healthy watersheds to be met by 2025.

- Rainfall surface runoff at pre-development levels;
- Watershed storage of runoff, through infiltration, recharge, baseflow, and interflow, at pre-development levels;
- Watercourse geomorphic regimes within natural ranges including sediment supply and transport and;
- Optimal riparian and aquatic habitats including stream flow, water columns, and biotic conditions.

Some factors that may prevent these goals or conditions from being attained include (UCSB Stormwater Management Guidance Document 2014).

- Proximity to Ocean – if a storm water system discharges directly to ocean, reducing flow volumes or peak flow rates may be unnecessary.
- Urban Infill Construction – when constructing urban infrastructure, there may not be a possibility or economic feasibility of reducing erosion and restoring riparian habitat.
- Geologic Site Conditions – infiltration in areas where site soils are subject to liquefaction due to too much water introduction may be detrimental to neighbors.

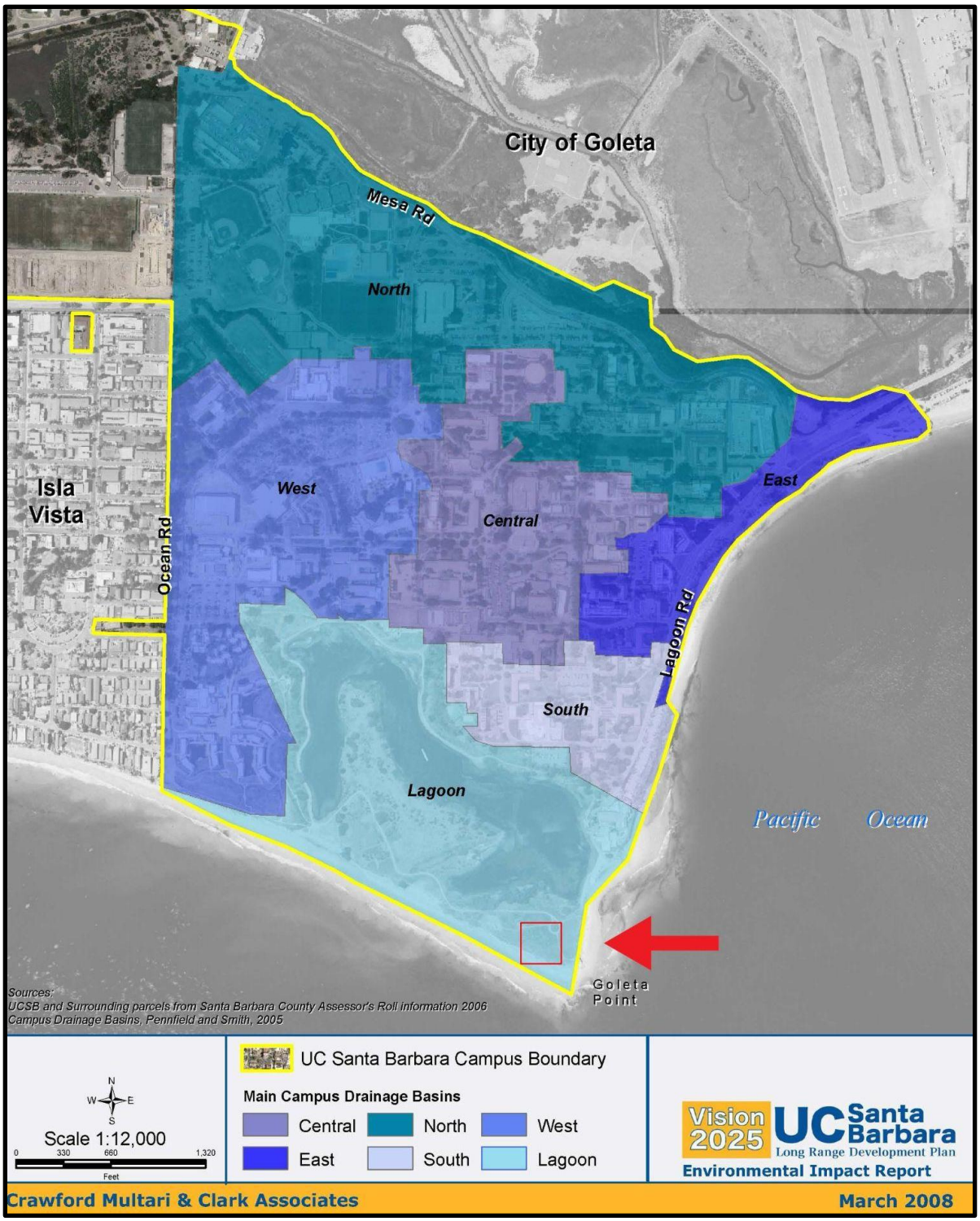


Figure 3-4. Regional Drainage Basins (UCSB LRDP 2008)

Figure 3-5. Campus Lagoon Grate Drain, Facing Northwest (Penfield & Smith 2008)

Figure 3-6. Campus Lagoon Storm Water Drain, Facing South (Penfield & Smith 2008)

3.3 Water Quality

Urban development increases the amount of impervious surface areas, reducing infiltration rates of stormwater into the ground. Because of the seasonal variation in rainfall, pollutants accumulate along roads, rooftops, parking lots, and other impervious surfaces during periods of minimal precipitation. When stormwater runoff flows over these surfaces, the pollutants drain into present water bodies. These "First-flush" precipitation events that produce runoff from particularly urban areas contain the most pollutants, including oil, fertilizer, animal waste, sediment, pesticides, bacteria, and viruses (UCSB 2008).

The following information is from the Cheadle Center for Biological and Ecological Restoration (CCBER) Campus Lagoon Water Quality Report (Stratton 2016). An existing water quality issue with the Campus Lagoon is the consistent input of high nutrient concentration from the storm drains during wet and dry seasons (see Figure 3-5, 3-6). These nutrients support growth of phytoplankton and large blooms of micro algae. Research on the historical use of the Campus Lagoon indicates the eastern portion was used for sewage disposal which may be a cause of its high nutrients (see Figure 3-8). A water quality experiment ran multiple times in the Manzanita bioswales indicated that bioswales significantly reduce nitrogen runoff in the dry and wet season (see Figure 3-7). The most problematic nutrient, nitrogen, is significantly diminished through the biologic processes that occur in bioswales. (CCBER 2016).

The 2016 Campus Lagoon Water Quality Report by CCBER concludes that the Lagoon is an "impaired water body" or a water body contaminated by pollutants. The Lagoon is diminished by excess nutrient inputs and subsequent eutrophication (see Table 3-1). Additionally, metal toxicity near storm drains and high pH-triggered ammonia toxicity events further impact benthic invertebrates and the food web. See the Biological Resources Section for more information on relevant riparian ecosystems.

Samplings of runoff near the Lagoon Road area revealed elevated copper and zinc concentrations likely because of the proximity to an asphalt parking lot and construction-related activities. Elevated zinc concentration could be attributed to galvanizing agents used to protect iron and steel from corrosion (UCSB 2008).

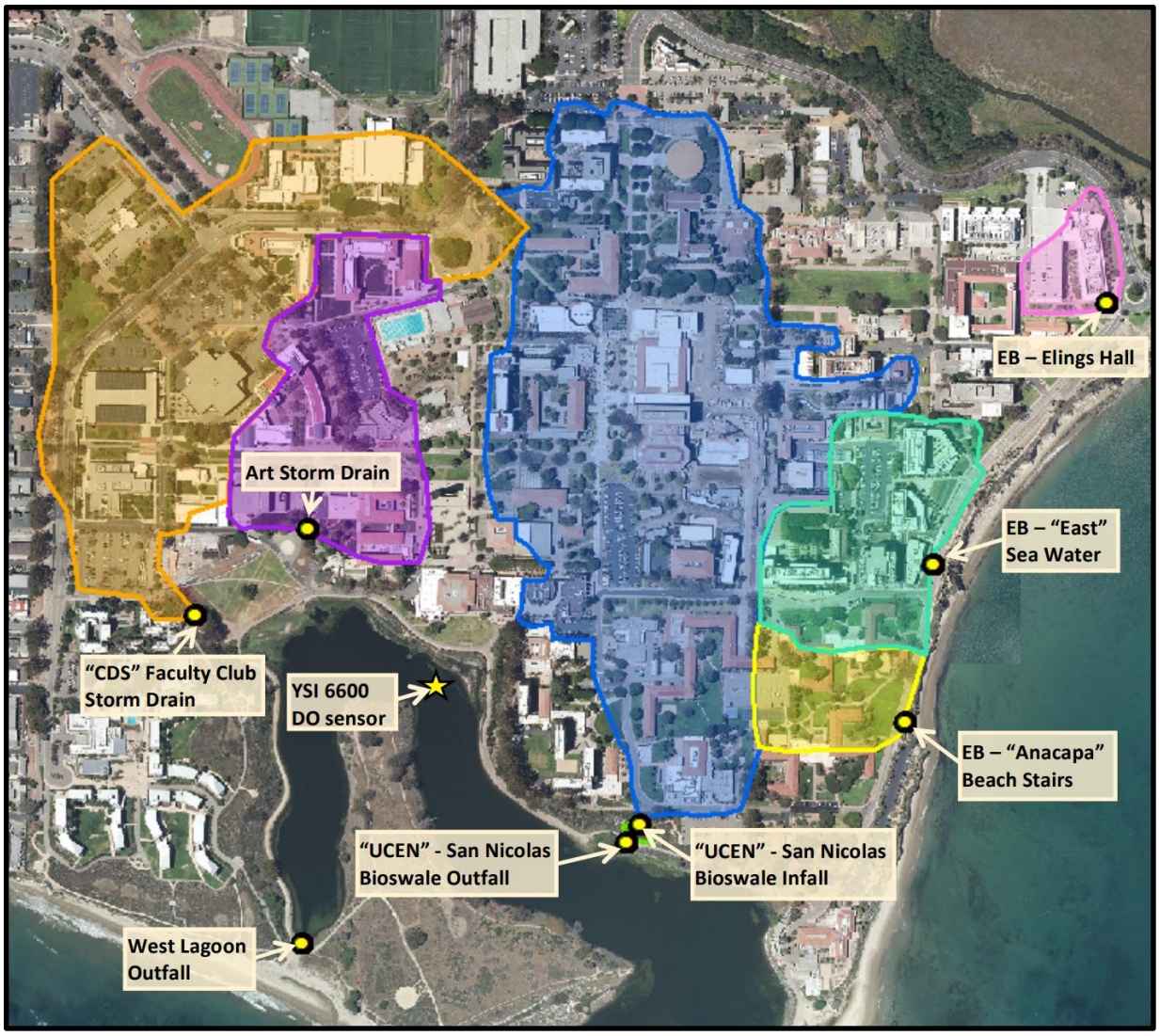


Figure 3-7. Map of Campus Lagoon Water Quality Report Sampling Locations and Associated Drainage Areas (CCBER 2016)

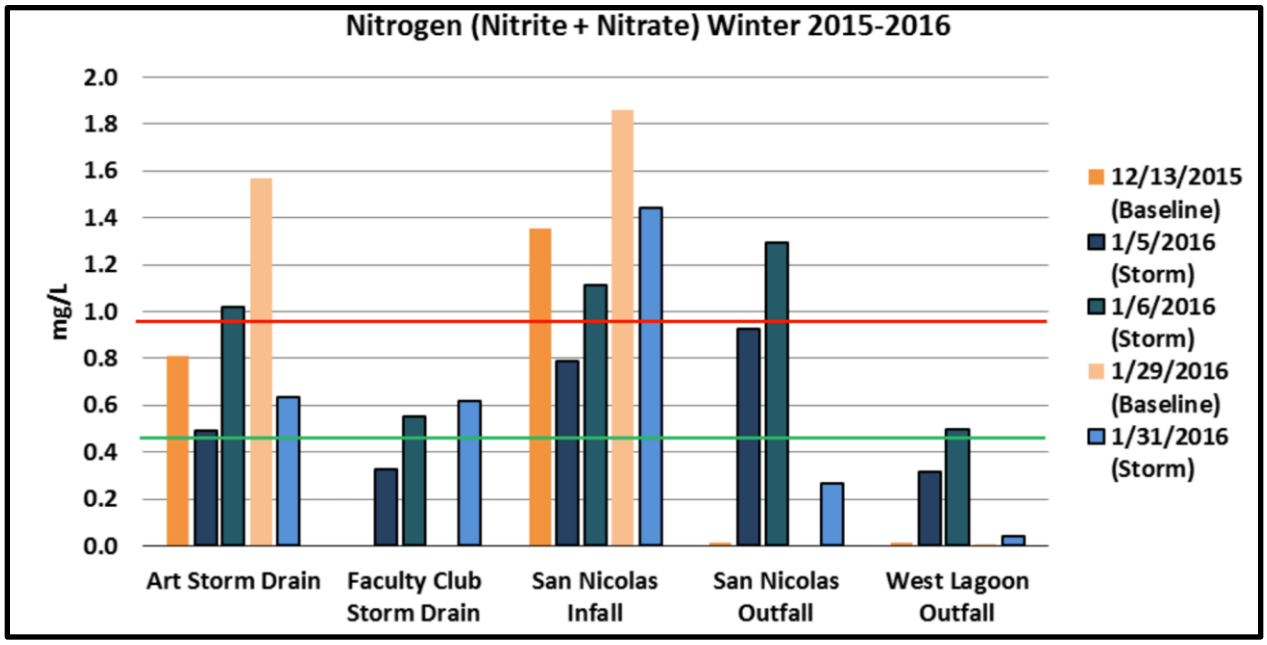


Figure 3-8. Nitrogen Levels. Sampling occurred at five locations during two baseline flows and three storm events. Red and green lines represent EPA recommended cut points. (CCBER 2016)

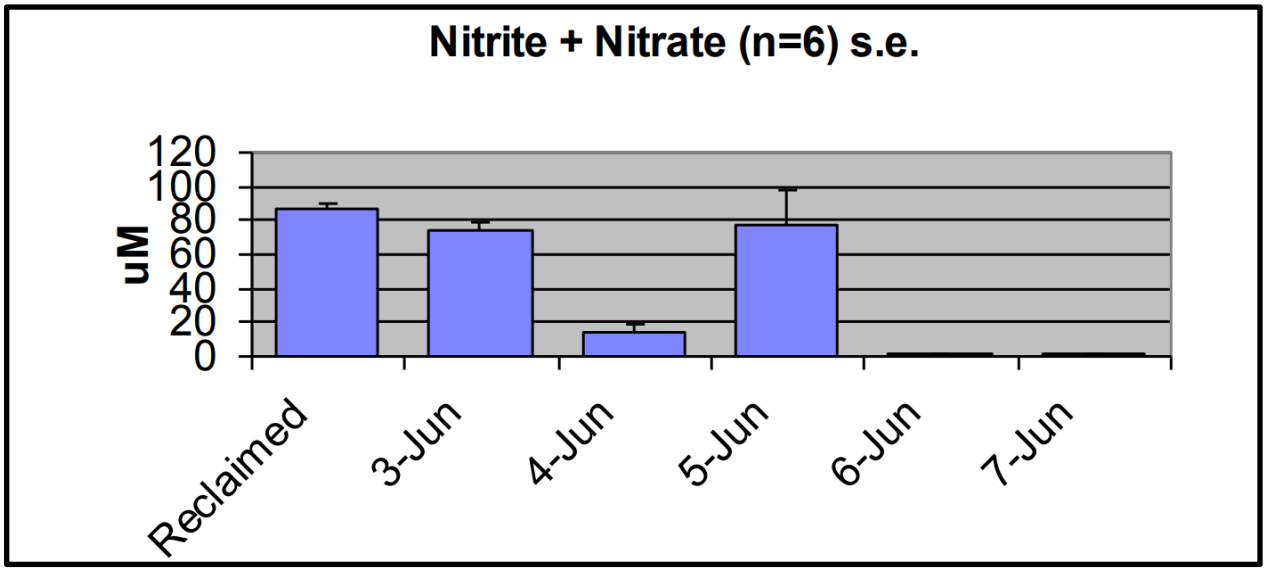


Figure 3-9. Nitrogen (Nitrite + Nitrate) concentration over time in bioswales pools, June 2009 (CCBER 2016)

Water Quality Indicators	Poor Quality	Fair Quality	Good Quality
Dissolved Oxygen (DO)	<2 mg/L	2-5 mg/L	>5 mg/L
Lagoon DO	*Bottom 50 cm year round.*	*Full water profile seasonally in this range (April-Sept)*	*Surface waters in the winter*
Nitrogen	>1.0 mg/L	0.5-1.0 mg/L	<0.5 mg/L
Storm drain Nitrogen	*Dry season runoff frequently exceeds*	*Majority of storm events generate levels in this range*	
Lagoon Nitrogen			*Generally within the lagoon, levels are reduced by algal growth*
Phosphorous	>0.1 mg/L	0.01-0.1 mg/L	<0.01 mg/L
Storm drain phosphorous	*Dry and wet season runoff greatly exceed*		
Lagoon phosphorous		*Frequently within moderate range*	
Chlorophyll *a*	>20 ug/l	5.0-20 ug/l	< 5.0 ug/l
Lagoon Chl. a	*Seasonally, far exceed these levels*		*Can be in this range depending on annual variation in conditions*
Water Clarity (% light penetration to 1 m)	< 10%	10-20%	>20%
Lagoon water clarity	*Mean of 9.6%*		*Occasionally above 20%*

Table 3-1. Campus Lagoon water quality status compared to highlighted indicators and cut point values used in water quality assessment from EPA (CCBER 2016)

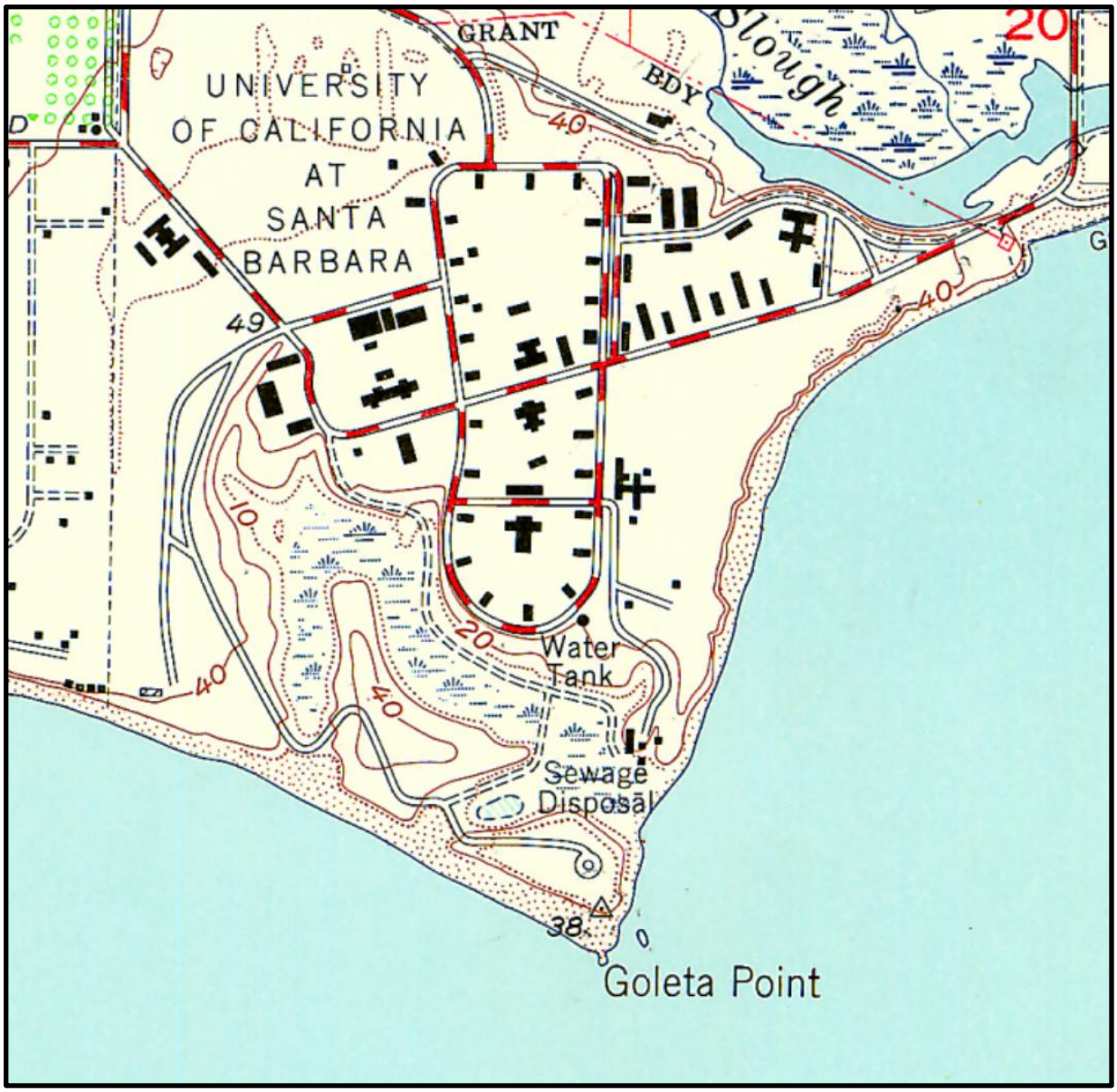


Figure 3-10. USGS topographic map from the 1950's indicates eastern portion of Campus Lagoon may have been used for sewage disposal (CCBER 2016)

3.4 Flooding

The proposed project site has been determined to be outside the 0.2% chance annual floodplain as indicated by the Federal Emergency Management Agency Flood Insurance Rate Map (FEMA FIRMs) due to its elevation. The proposed access road extension, however, is subject to a 100-year storm – meaning there is a 1% chance each year that a storm will flood that area (see Figure 3-9 and 3-10).

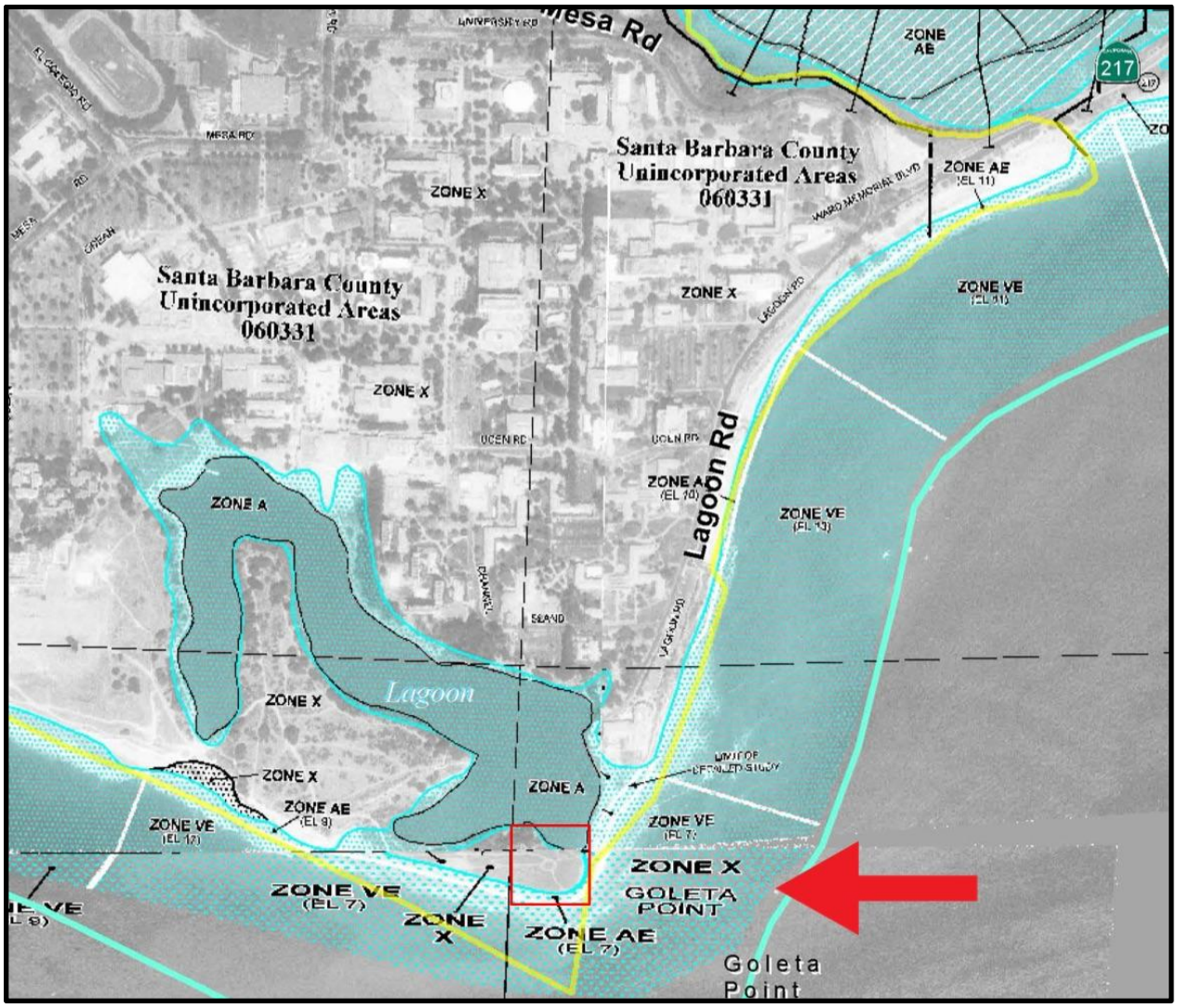


Figure 3-11. FEMA Flood Hazard Map. Project site indicated by red arrow (UCSB LRDP 2008)

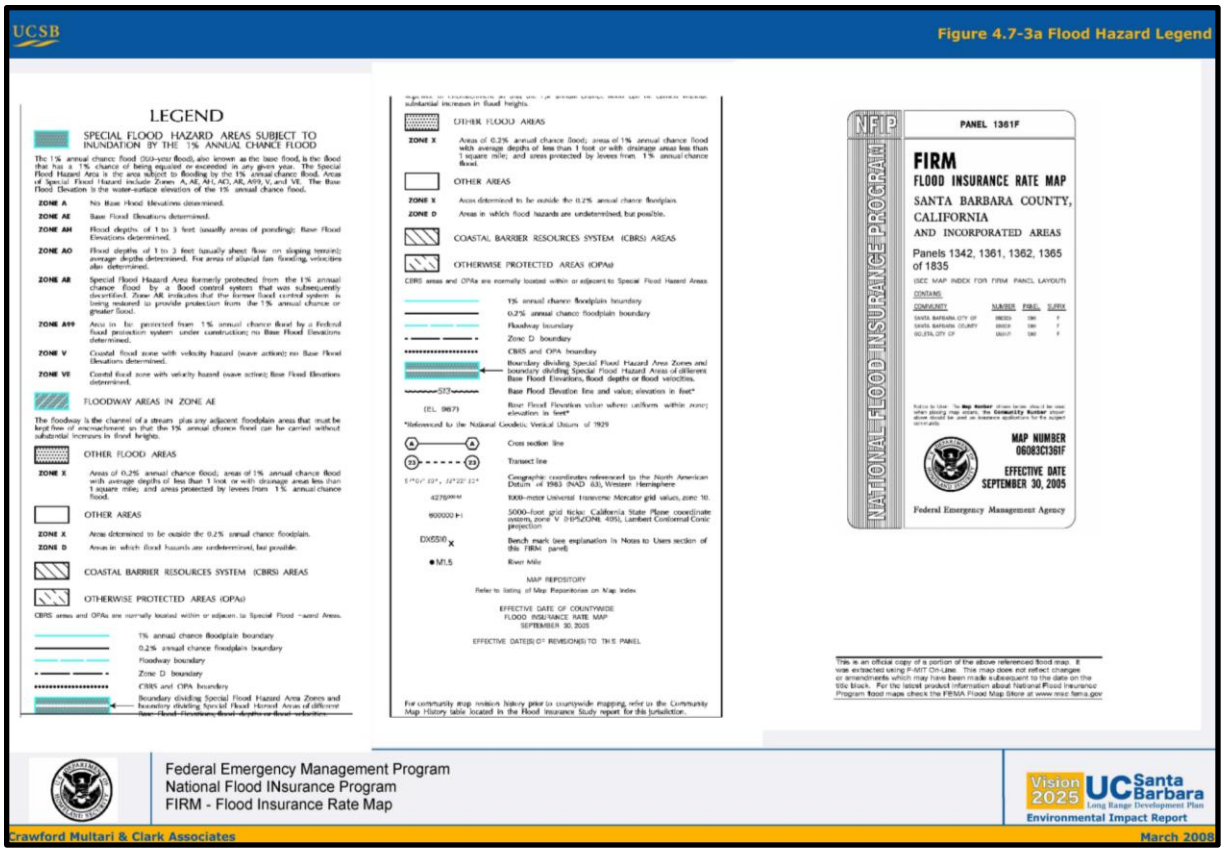


Figure 3-12. FEMA Flood Hazard Legend (UCSB LRDP 2008)

3.5 Erosion

Erosion along drainage ways results from natural erosion processes and increased runoff due to impervious surfaces. Accelerated erosion can increase sediment loads in waterways, diminishing water quality, negatively impacting biologic and hydrologic systems. (UCSB 2008) The drainage outlets along Lagoon and Ocean Road may be contributing to erosion of bluffs. (Penfield & Smith 2008). The rate and quantity of erosion largely depends on the relevant soil type. See the Geological Resources section for more information on soil type at the project site.

3.6 Tsunami

A tsunami is a large wave caused by movement along a fault or an underwater landslide. The project site locations along the coast result in potential tsunami risk. Along the South Coastal Plain Areas of Santa Barbara County, tsunami risk zones are designated 1-mile inland and up to 30-food elevations above sea level.

The recurrence of tsunami events in Santa Barbara is low; they occur on a few hundred-year scale. The Campus Lagoon, specifically because of its horizontal and vertical proximity to the Pacific Ocean, is at

risk for potential run-up. The National Oceanographic and Atmospheric Administration (NOAA) established the *TsunamiReady* program, providing requirements for emergency communication and safety areas. UCSB was the first university to be *TsunamiReady*, meaning there are defined communication systems and evacuation routes that lead to designated shelter outside of the tsunami hazard zones (UCSB 2008).

3.7 Regulatory Compliance

3.7.1 National Flood Insurance Act and Flood Disaster Protection Act

The following information for the subsection is from the 2008 UCSB LRDP. In 1968 and 1973, Congress passed the National Flood Insurance Act and Flood Disaster Protection Act, respectively, to reduce costs of disaster relief and reduce unnecessary flood control structures through the restriction of development in floodplains. FEMA administers the National Flood Insurance Program to subsidize flood insurance to communities that comply with its limits on development in floodplains. FEMA FIRMs delineate flood hazard zones in communities participating in the National Flood Insurance Program (UCSB 2008). UC Santa Barbara is subject to coastal storm inundation (see Figure 3-9).

3.7.2 Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1969 established the State Water Resource Control Board (SWRCB), including the 9 regional boards as the primary agency controlling water quality in California. The Act allowed the SWRCB to establish water quality guidelines for ground water and surface water management programs (UCSB 2008).

3.7.3 Central Coast Regional Water Quality Control Board Basin Plan (Central Coast RWQCBP)

UCSB lies within the jurisdiction of the Central Coast RWQCBP, which has the authority to implement water quality standards through permitting for discharges to waters that reside within its jurisdiction. The Central Coast Basin Plan sets surface water and water quality objectives and guidelines enforced by the Central Coast RWQCBP. UCSB lies within the Goleta Hydrologic Subarea, where the present groundwater is suitable for agricultural water supply, municipal and domestic water supply, and industrial use (UCSB 2008).

3.7.4 Clean Water Act

Section 303(d) of the Clean Water Act requires listing a water body as “impaired” when designated beneficial uses of that water body are being compromised by water quality. The Basin Plan designates these beneficial uses (wildlife habitat, fishing, agricultural supply). Once a body has been deemed

“impaired, a Total Maximum Daily Load (TMDL) must be established for that water body. A TMDL is an estimate of the total pollutants from point and non-point sources that a water may receive without exceeding water quality standards.

3.7.5 Campus Storm Water Management Plan

Through designation from the SWRCB, UCSB has prepared a Storm Water Management Plan (SWMP) that addresses six general control measures.

1. Public education and outreach;
2. Public participation and involvement;
3. Illicit discharge detection and elimination;
4. Construction site stormwater runoff control for sites greater than one acre;
5. Post-construction stormwater management in new development and redevelopment and;
6. Pollution prevention for operations.

The University developed a Storm Water Work Group with representatives from various campus departments. This Work Group provides input on the development and implementation of the Campus SWMP. This SWMP is the primary measure of regulatory compliance used to address construction stormwater runoff. Additionally, the SWRCB requires discharges to eliminate non-stormwater discharges to stormwater systems, develop and implement a Storm Water Pollution Prevention Plan that implements best management practices to minimize impacts to storm water quality.

4.0 IMPACT ASSESMENT

This section will present the level of potentially adverse environmental impacts on hydrology and water quality from the construction and operation of the proposed project.

4.1 Project Impact Criteria

In accordance with Appendix G, section VIII of the 2024 CEQA Guidelines, the proposed project would have a significant impact on hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
    - Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
- Place within a 100-year flood hazard area structures that would impede or redirect flood flows;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

In accordance with Santa Barbara County Thresholds Manual, the proposed project would have a significant impact on water quality if it would

- Increase the amount of impervious surfaces on a site by 25 percent or more.

4.2 Project Impacts

4.2.1 Short-Term Construction Impacts

Impact WQ - 1: Implementation of the proposed project would result in construction activity extending through Lagoon Road and Campus Point**. Runoff from construction sites has the potential to violate water quality standards and substantially degrade surface or ground water quality.**

Implementation of the proposed project would result in the construction of additional buildings, roadways, parking areas and other impervious surfaces that would increase the volume and velocity of surface runoff which, in turn, may result in violations of surface water quality standards.

Based on previous projects built by the University, it is reasonable to assume construction of the proposed project would occur over a 1–2-year span, including the duration of the wet season. The project site is approximately 2-acres. Proposed construction activities include grading and excavating, erection of new structures, paving, and finishing and coating (see 2.4 Project Construction). Each of these activities have the potential to impair water quality standards due to the release of construction-related pollutants such as concrete, asphalt, paints, fuel, and other chemicals next to the Campus Lagoon (CCBER 2016). The close proximity to the Campus Lagoon, a significant storm water drainage basin for the UCSB campus, increases the susceptibility to construction-induced water quality degradation due to runoff.

According to the EPA's National Pollutant Discharge Elimination System (NDPES), common pollutants associated with construction are solid waste, phosphorus, nitrogen, lead, copper, zinc, oil and grease, pesticides, and construction debris. The site-adjacent Lagoon greatly exceeds EPA standards for nitrogen and phosphorus concentrations (see Table 3-1). Water quality sampling at Lagoon Road revealed criteria-exceeding levels of metals including copper, zinc, lead, and nickel. High nutrient input from stormwater drains is an existing water quality issue in the Campus Lagoon (CCBER 2016).

Santa Barbara's mediterranean climate indicates more frequent and extreme precipitation events during the wet season (see Figure 3-3). Construction can occur during the wet season, increasing the chances of substantial stormwater pollutant runoff. **Construction activity extending from Lagoon Road to Campus point would result in a significant short-term impact on water resources.**

Impact WQ- 2: Construction activity, including substantial grading, would potentially alter the existing drainage pattern of the site or area in a manner which **would result in substantial erosion or siltation on-site.**

The proposed extension of Lagoon Road would result in substantial grading of the mesa adjacent to the Campus Lagoon (see Points A and D in Figure 2-2). Based on the measurements of the potential road taken on a site visit, approximately 20,000 square feet of soil would be required to be removed (see 2.4 Project Construction). The replacement of soil with impervious surfaces would increase the volume and velocity of surface runoff, thus increasing erosion. Additionally, the removal of topsoil for grading and construction leads to sedimentation as more sediment is loosened and prone to transport via runoff. Excess sediment from grading would increase on-site siltation, leading to increased levels of solids in waterways (UCSB 2008). Proposed construction activity like grading would increase erosion along the Campus Point bluffs, which are already vulnerable to erosion from the Pacific Ocean during storm events (see Point B and C in Figure 2-2).

The University's proposed project would disturb an area greater than one acre in size; therefore, the University would be required to finale file a Notice of Intent to comply with the National Pollutant Discharge Elimination System (NPDES) general construction activities stormwater discharge permit from the State Water Resources Control Board (SWRCB) and develop and implement a Stormwater Management Plan (see 3.7.5 Campus Storm Water Management Plan). **Substantial grading would**

alter the existing drainage pattern of the project site, resulting in a significant short-term impact on water resources.

4.2.2 Long-Term Operation Impacts

Impact WQ-3: The addition of impervious surfaces would increase discharge of pollutants into an "impaired" waterbody during project operation, **resulting in a potentially substantial impact on water quality and increase the percentage of on-site impervious surfaces 25% or more.**

Although the SWRCB does not consider the Campus Lagoon an "impaired" water body under the Clean Water Act 303(d) list, the 2016 Campus Lagoon Hydrology Report describes it as "impaired" due to the high concentration of phosphorus, nitrogen, and copper. Project operation would increase pollutants such as

- Fertilizers from landscaping upkeep;
- Oil and gas from increased vehicular traffic and;
- Heavy metals from proximity to asphalt roads and construction.

Specifically, the disturbed areas within the project site could lead to a potential increase in the volume and velocity of stormwater runoff and sediment load potentially carrying the listed pollutants that can be expected to leave the site and eventually be discharged into the Lagoon and coastal waters.

It is reasonable to estimate that the proposed project and Lagoon Road extension would increase the impervious surfaces by 25% (see Figure 2-2). **The addition of impervious surfaces to the project site would result in a significant long-term impact on water resources.**

Impact WQ- 4: The proposed project would potentially alter the drainage pattern of portion of the site **located within a 100-year flood plain.**

As shown by the Federal Emergency Management Agency Flood Insurance Rate Map, the Lagoon Road extension is located within the 100-year flood plain (see Figures 3-9, 3-10). The impervious surface would alter the drainage pattern, potentially increasing the volume and velocity of storm water runoff into the lagoon, thus increasing the risk of flooding for low-lying areas (UCSB 2008). **The alteration of a portion of the project site within a 100-year flood plain would result in a significant long-term impact on water resources.**

4.3 Mitigation Measures and Residual Impact

The following measures would be required to address significant environmental impacts on water resources resulting from construction and operation of the project.

Impact WQ-1: Implementation of the proposed project would result in construction activity extending through Lagoon Road and Campus Point. Runoff from construction sites would have the potential to violate water quality standards and substantially degrade surface or ground water quality.

MM WQ-1: In order to minimize potentially significant water quality impacts from construction runoff, the applicant shall develop a Storm Water Pollution Prevention Plan (SWPP) that includes Best Management Practices (BMPs) designed to stabilize the site, protect natural water bodies, prevent erosion, and convey storm water runoff to existing drainage systems keeping contaminants and sediments onsite. According to the publicly available 2014 UCSB Stormwater Guidance Documents, inspections during construction would be done **weekly** by either of the following departments at UCSB: Design and Construction Services, Environmental Health & Safety, and Facilities Management. Post-construction inspections are done **continuously**. Specific inspection dates are not currently available but will remain consistent with UCSB construction guidelines.

The SWPP requirements shall be implemented prior to the commencement of grading throughout the year. These BMPs shall involve

- Sand bags
- Erosion control blankets
- Diversion ditches
- Spill prevention and control

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM WQ-1: Implementation of the proposed project would result in construction activity extending through Lagoon Road and Campus Point.	A qualified hydrologist or civil engineer shall prepare the Storm Water Pollution Prevention Plan (SWPPP). The SWPPP requirements shall be implemented prior to the commencement of grading and throughout the year.	The University is required to file a Notice of Intent to comply with the National Pollutant Discharge Elimination System (NDPES) General Construction Permit and develop a site-specific SWPPP for individual construction projects.	The UCSB Office of Planning and Research shall oversee all SWPP components and perform site inspections throughout the construction phase. The plan shall be designed to address construction-related erosion and pollution control during all

			phases of development.

Residual Impacts WQ-1

Incorporation of measure MM WQ-1 would feasibly contain runoff that would possibly contain pollutants from construction such that impacts on water resources would be **reduced to less than significant (Class II).**

Impact WQ- 2: Construction activity, including substantial grading, could alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on-site.

MM WQ-2: To minimize the increase in substantial on-site erosion and siltation, the applicant shall develop an Erosion and Sediment Control Plan (ESCP). Grading and erosion control plans shall be designed to minimize erosion during construction and shall be implemented for the duration of the grading structures. The applicant shall prevent water contamination during construction by implementing the following ESCP measures

- All entrances/exits to the construction site shall be stabilized using methods designed to reduce transport of sediment off site including:
    - Gravel pads
    - Steel rumble plates
    - Temporary paving
- Apply concrete, asphalt, and seal coat only during dry weather
- Cover storm drains and manholes within the construction area when paving or applying seal coat, slurry, fog seal, etc.
- Store, handle and dispose of construction materials and waste such as paint, mortar, concrete slurry, fuels, etc. in a manner which minimizes the potential for storm water contamination.
- Revegetation of graded surfaces within 30 days of grading

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM WQ-2: Construction activity, including substantial grading, could alter the existing drainage pattern of the site or	A civil engineer shall prepare the Erosion and Sediment Control Plan (ESCP), detailing mechanisms of mitigation. The	The ESCP shall be reviewed and approved by the UCSB Office of Planning and Research prior to	The UCSB Office of Planning and Research shall confirm that all ESCP components are installed prior to

area in a manner which would result in substantial erosion or siltation on-site.	ESCP shall be prepared prior to grading permit issuance.	grading permit issuance and land clearance issuance.	construction and ensure proper management practices throughout construction.

Residual Impacts WQ-2:

The incorporation of measure MM WQ-2 would not feasibly contain potential erosion and sedimentation during construction due quantity of substantial grading and proximity to the Campus Lagoon such that the residual impact on water resources would remain **significant and unavoidable (Class I).**

Impact WQ-3: The addition of impervious surfaces would increase discharge of pollutants into an "impaired" waterbody during project operation, resulting in a potentially substantial impact on water quality and increase the amount of impervious surfaces on site to 25% or more.

MM WQ-3: To reduce the discharge of pollutants from on-site impervious surface during project operation, the applicant shall prepare a Storm Water Management Plan (SWMP) that includes Best Management Practices (BMPs). The SWMP shall address six general control measures: 1) public education and outreach; 2) public participation/involvement; 3) illicit discharge detection and elimination; 4) construction site stormwater runoff control for sites greater than one acre; 5) post-construction stormwater management in new development and redevelopment; and 6) pollution prevention/good housekeeping for operations. All BMPS shall be designed in accordance with the California Storm Water BMP Handbook for New Development and Redevelopment (California Storm Water Quality Association) or other approved methods. BMPs include the addition of

- Stormwater Retention Basins
- Bioswales
- Permeable Pavement
- Infiltration Trenches
- Storm Water Retention-Roof Runoff Collection
- Storm Water Retention-Buffer Strips

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM WQ-3: The addition of impervious surfaces would increase discharge of	The University's Storm Water Work Group, comprised of representatives from various campus	The University is required to file a Notice of Intent to comply with the National Pollutant	The requirements of the NPDES program extend through the post-construction

pollutants into an "impaired" waterbody during project operation, resulting in a potentially substantial impact on water quality and increase the amount of impervious surfaces on site to 25% or more.	departments and student groups, shall provide input into development and implementation of the SWMP prior to issuance of grading permit.	Discharge Elimination System (NDPES) General Construction Permit and develop a site-specific SWPPP for individual construction projects prior to issuance of grading permit.	period and require the installation and maintenance of project appropriate best management practices to address long-term risks. The applicant shall demonstrate to compliance monitoring staff and Building and Safety grading inspector(s) that all required components of the approved SWMP are in place as required**.**

Residual Impacts WQ-3:

Incorporation of measure MM WQ-3 would feasibly contain stormwater runoff that would possibly contain pollutants during operation such that impacts on water resources would be **reduced to less than significant (Class II).**

Impact WQ-4: The proposed project would potentially alter the drainage pattern of portion of the site located within a 100-year flood plain.

MM WQ-4: To prevent flooding on-site, the applicant shall provide a retention basin designed to retain, infiltrate and/or recharge all runoff water onsite, and maintain contaminants. The applicant shall include the retention basin in the Storm Water Management Plan (SWMP).

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM WQ-4: To prevent flooding on-site, the applicant shall provide a retention basin designed to retain,	A qualified civil engineer shall prepare the specifications, parameters and location of the	The location and design parameters of the retention basin shall be reviewed by the UCSB Office of	Installation and maintenance for five years shall be ensured through a performance security

infiltrate and/or recharge all runoff water onsite, and maintain contaminants.	retention basin. Retention and/or recharge basins shall be installed prior to Final Building Inspection Clearance.	Planning and Research and Santa Barbara County Flood Control for review and approval prior to issuance of grading permit.	provided by the applicant. County Flood Control and grading inspectors shall oversee installation.

Residual Impacts WQ-4:

Incorporation of measure MM WQ-4 would feasibly contain extreme stormwater runoff that would possibly prevent on-site flooding such that impacts on water resources be **reduced to less than significant (Class II).**

5.0 CUMULATIVE IMPACTS

This section discusses the cumulative impacts of the proposed project on water quality. A cumulative impact is defined as an impact which is created as a result of the combination of impacts from the proposed project together with other projects causing related impacts (CEQA 15130).

5.1 Region of Influence

The geographic scope of the area must be defined when assessing cumulative impacts of a proposed project (CEQA Guidelines 15130(b)(3)). The region of influence for impacts on water resources are defined as the potential for projects to contribute to the degradation of impaired water bodies. In this region, impaired water bodies include the Campus Lagoon, Deveraux Slough, and the Goleta Slough. Any projects that have clear and direct potential for stormwater runoff towards these impaired water bodies would be considered within the water resource region of influence.

5.2 Related Projects for Analysis

The EIR cumulative impact assessment considers the list of all past, present and reasonably foreseeable projects identified in the Goleta Fire Station 10 EIR. All such projects are indicated by Figure 5-1 and Table 5-1.

Figure 5-1. Related Projects for Cumulative Impact Analysis (Goleta Fire Station 10 EIR, 2018)

Table 5-1. Related Projects for Cumulative Impact Analysis (Goleta Fire Station 10 EIR 2018, UCSB 2008)

Project No.	Project Name	Description	Location	Project Status
Projects Under Construction				
1	Village at Los Carneros	Residential, 465 units	Calle Koral and Los Carneros Road	Under construction
2	Fairview Commercial Center	7,476 s.f. commercial / retail building	151 South Fairview Avenue	Under construction
3	Harvest Hill Ranch	7-Lot Residential Subdivision with 6 new homes	880 Cambridge Drive	Under construction
4	Islamic Society of SB	6,183 s.f. building with prayer room, meeting area and 1 caretaker unit	N/E Corner of Los Carneros and Calle Real	Under construction
5	Citrus Village	Residential, 10 units	7388 Calle Real	Under construction
6	Old Town Village	Residential and Commercial mixed use, 175 townhomes with shopkeeper and live-work unit	South Kellogg Avenue	Under construction
7	Marriott Residence Inn	80,989 s.f. hotel, 118 rooms	6300 Hollister Avenue	Under construction

8	Highway Recycling	Concrete and asphalt recycling facility with temporary and permanent equipment. Includes new creek restoration, fencing, landscaping, trash enclosure, retaining wall, and drainage improvements	909 South Kellogg Avenue	Under construction
Approved Projects (Not Constructed)				
9	McDonalds Drive Thru Expansion	Second drive-thru lane, revised parking and circulation, and new landscaping	1465 South Fairview Avenue	Approved
10	Rancho Estates Mobile Home Park Fire Improvements (Rancho Goleta)	New fire access road, new/upgraded fire hydrants, new water lines, and bring existing car wash into conformance	7465 Hollister Avenue	Approved
11	Pacific Beverage at Cabrillo Business Park Reduced Project	Reduction in 24,398 s.f. from previously approved building	355 Coromar Drive	Approved
12	Site Improvements	768-s.f. elevator addition, 1,100-s.f. new building, and 314-s.f. addition to rear of building	130 Robin Hill Road	Approved
13	Schwann Self Storage	Addition of basements to 3 previously approved but unconstructed buildings for a 135,741 s.f. self-storage facility	10 South Kellogg Avenue	Approved
14	Cortona Apartments	Residential, 176 units	6830 Cortona Drive	Approved

15	Fuel Depot	Reconstruction of convenience store/auto-service building (2,396 s.f.); no changes to existing fueling stations or canopy	180 North Fairview Avenue	Approved
16	Somera Medical Office Building	20,000 s.f. net new medical/dental office building	454 South Patterson Avenue	Approved
17	Ward Renovations and Lot Split	New building façade, new site renovations, and lot split	749 and 759 Ward Drive	Approved
Pending Projects (Complete Applications)				
18	Shelby	Residential, 60 units	7400 Cathedral Oaks Road	Pending, Complete Application
19	Kenwood Village	Residential, 60 units	7300 Calle Real	Pending, Complete Application
20	Fairview Gardens	Master Use Permit and Special Events	598 North Fairview Avenue	Pending, Complete Application
21	Heritage Ridge	Residential, 228 apartments and 132 senior apartments	North of Calle Koral and East of Los Carneros	Pending, Complete Application
22	Ellwood Mesa Coastal Trails and Habitat Restoration Project	Improve 7.1 miles of trails, improve 3 drainage crossings, improve 2 beach access points, and 13 acres of habitat restoration	Ellwood Mesa Preserve	Pending, Complete Application
Pending Projects (Incomplete Applications)				

23	Cabrillo Business Park, Lot 5	New 23,882-s.f. building within Cabrillo Business Park	6789 Navigator Way	Pending, Incomplete Application
24	Cabrillo Business Park, Lot 6	New 16,750-s.f. building within Cabrillo Business Park	6765 Navigator Way	Pending, Incomplete Application
25	Cabrillo Business Park, Lot 7	New 31,584-s.f. building within Cabrillo Business Park	6759 Navigator Way	Pending, Incomplete Application
26	Cabrillo Business Park, Lot 9	New 44,924-s.f. building within Cabrillo Business Park	301 Coromar Drive	Pending, Incomplete Application
27	Cabrillo Business Park, Lot 14	New 44,004-s.f. building within Cabrillo Business Park	289 Coromar Drive	Pending, Incomplete Application
28	Calle Real Hotel	3-story hotel, 134 rooms	5955 Calle Real	Pending, Incomplete Application
29	Fuel Depot with Car Washes	1,667 s.f. new drive-in carwash, self-serve car wash, gas fueling dispensers and manager's residence; Zizzo's Coffee building to remain	370 Storke Road	Pending, Incomplete Application
30	Willow Industrial Park	146,000 s.f. new Light Industrial with outdoor storage and 2,587 s.f. office building	891 South Kellogg Avenue	Pending, Incomplete Application
31	Providence Middle/High School	Façade improvement to existing 21,408 s.f. building and other associated site improvements	5385 Hollister Avenue	Pending, Incomplete Application
32	Cortona Industrial Project	23,000-s.f. light industrial building use building and tentative parcel map	6864/6868 Cortona Drive	Pending, Incomplete Application

33	Santa Barbara Honda	Includes façade improvements, a 1.628 s.f. enclosure of existing canopy for added showroom, a new 5,175 s.f. new enclosed canopy, and a new 300 s.f. new parts room	475 South Kellogg Avenue	Pending, Incomplete Application
34	Verizon Wireless Antenna at U.S. Post Office	New 66 ft. tall monopine wireless tower	400 Storke Road	Pending, Incomplete Application
35	Sywest	70,594 s.f. high cube industrial building	907 South Kellogg Avenue	Pending, Incomplete Application
UCSB Related Projects				
36	San Benito Housing	Residential, 11.8-acre site, 750 units	6765 Navigator Dr	Approved
37	Ocean Road Housing	Residential, 16.7-acre site 540 units	Ocean Rd	Under Construction
38	ILP Classrooms Building	Educational, 2,000 classroom seats, 5 stories	UCSB Campus	Complete
39	Henley Hall	Research facility, 53,000 s.f.	552 University Rd	Complete
Totals		**2,556,260 s.f**		

5.3 Cumulative Impacts

5.3.1 Combined Cumulative Impact

Along with the proposed project, Project No. 5 and No. 19 indicated on Figure 5-1 potentially would contribute to cumulative impacts to water resources. Table 5-2 describes the characteristics of these projects.

Table 5-2. Projects Identified for Cumulative Impact Analysis

Project No.	Project Name	Description	Location	Project Status
5	Citrus Village	Residential, 10 units, 40,946 s.f.	7388 Calle Real	Under construction
19	Kenwood Village	Residential, 60 units, 435,600 s.f.	7300 Calle Real	Pending, complete application
Total		**476, 547 s.f.**		

The total acres of the related projects within the region of influence are approximately 11 acres. The total residential occupancy is 70 units. It is reasonable to assume that Projects Citrus Village and Kenwood Village are located within substantial proximity to Devereux Creek. Devereux Creek drains into the Devereux Lagoon, which ultimately contributes to the water quality of the Devereux Slough. Devereux Slough is listed as an impaired water body within 303(d) of the Clean Water Act. The increase in impervious surfaces and pollutants from construction and operation of residential housing and the proposed project combined with proximity to a stream that drains into an impaired water body indicates that **the combined cumulative impact of the related projects would be significant, per WQ-4.**

5.3.2 Project Contribution to Cumulative Impact

The proposed project site is approximately 40,000 square feet (s.f). Related + proposed projects indicated in Table 5-2 would impact 476, 547 s.f.. Therefore, the projects contribution to cumulative impacts is 40,000 / 476,547 = 8.4%. Although the project's contribution to cumulative impacts is relatively small, the proposed projects adjacency to the Campus Lagoon, an impaired water body, makes its impact to water resources **cumulatively considerable.**

5.3.3 Mitigation Measures and Residual Impacts

The cumulative mitigation measure would be the same mitigation measure as MM WQ-3 (see Section 4.2.3 MM WQ-3).

MM CUM-WQ: To reduce the discharge of pollutants from on-site impervious surface during project operation, the applicant shall prepare a Storm Water Management Plan (SWMP) that includes Best Management Practices (BMPs). The SWMP addresses six general control measures: 1) public education and outreach; 2) public participation/involvement; 3) illicit discharge detection and elimination; 4) construction site stormwater runoff control for sites greater than one acre; 5) post-construction stormwater management in new development and redevelopment; and 6) pollution prevention/good housekeeping for operations. All BMPS shall be designed in accordance with the California Storm Water BMP Handbook for New Development and Redevelopment (California Storm Water Quality Association) or other approved methods. BMPs include the addition of

- Stormwater Retention Basins
- Bioswales
- Permeable Pavement
- Infiltration Trenches
- Storm Water Retention-Roof Runoff Collection
- Storm Water Retention-Buffer Strips

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM CUM-WQ	The Universities Storm Water Work Group, comprised of representatives from various campus departments and student groups, shall provide input into development and implementation of the SWMP.	The University is required to file a Notice of Intent to comply with the National Pollutant Discharge Elimination System (NDPES) General Construction Permit and develop a site-specific SWPPP for individual construction projects.	The requirements of the NPDES program extend through the post-construction period and require the installation and maintenance of project appropriate best management practices to address long-term risks. The applicant shall demonstrate to compliance monitoring staff and Building and Safety grading inspector(s) that all required components of the approved SWMP are in place as required.

Residual Impacts CUM-WQ:

Incorporation of measure MM WQ-3 on the proposed project would feasibly contain stormwater runoff that would possibly contain pollutants during operation such that cumulative impacts on water resources would be **reduced to less than cumulatively considerable (Class II).**

6.0 PROJECT ALTERNATIVES

This section discusses alternatives to the project or its location, which are capable of substantially lessening any significant effects of the project on water resources, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly, as defined by CEQA Guidelines 15126.6(b).

6.1 Project Objectives

The first step in determining a reasonable range of alternatives to be analyzed is to consider the basic project objectives as previously defined in Section 2.1. Such objectives include:

- Improving educational quality through attractive faculty housing
- Maintaining accessible classrooms such that students can commute within 10-15 minutes of campus by walking
- Providing 23 residential units for faculty housing
- Promoting academic excellence through the addition of 12 classrooms

6.2 Significant Environmental Impacts

The second step in identifying a feasible range of project alternatives is to define all potentially significant impacts to water resources associated with the proposed project. Only potentially significant impacts can be used to identify feasible project alternatives. These are listed below:

- **Impact WQ-1:** Runoff from construction sites has the potential to adversely affect water quality standards;
- **Impact WQ-2:** Construction activity such as grading could alter existing drainage pattern of the site, resulting in substantial on-site erosion or siltation;
- **Impact WQ-3:** The addition of impervious surfaces would increase discharge of pollutants into an “impaired” waterbody during operation and increase the amount of impervious surfaces onsite to 25% and more;
- **Impact WQ-4:** The proposed project would potentially alter the drainage pattern of a portion of the site located within a 100-year flood plain.

6.3 Project Alternatives Screening Criteria

A range of feasible alternatives that meet most of the basic proposed project objectives in Section 6.1 and avoid or reduce the extent of significant environmental impacts in Section 4.0 include

- Reducing classrooms from 12 to 8
- Reducing residential units from 23 to 12
- Being located within a 10-15 walk from campus
- Being located in an area with attractive scenery
- Avoiding degradation of water quality
- Avoiding construction and operation within a 100-year flood plain
- Avoiding substantial siltation and erosion into an impaired water body

These meet most of the proposed objectives (> 50%) while reducing the amount of construction necessary, thereby reducing potential pollutants in stormwater runoff.

6.4 "No Project" Alternative

The purpose of describing a "no project" alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The "no project" alternative analysis shall discuss the existing conditions as well as what would be reasonably expected to occur, as defined by CEQA 15126.6(e). It is reasonable to assume that construction for trail maintenance adjacent to the Campus Lagoon would occur in the foreseeable future, expanding the trail from 2 feet to 4 feet. Potential ground disturbances include the removal of invasive iceplant. Based on the site visit, it is also reasonable to assume that removal of invasive species like ice plants would occur, causing potential sedimentation into the adjacent water body

Impact WQ-1: Under the No Project, impacts associated with runoff from construction sites would not occur. It is reasonable to assume that no substantial construction would occur for the foreseeable future, preventing pollutants entering stormwater runoff and hindering water quality standards. **Impact WQ-1 under the No Project Alternative would be eliminated *and would be less than the proposed project.***

Impact WQ-2: Under the No Project, impacts associated with construction activity, such as substantial on-site erosion or siltation, would not occur. It is reasonable to assume, however, that construction for trail maintenance adjacent to the Campus Lagoon would occur in the foreseeable future, expanding the trail from 2 feet to 4 feet. It is also reasonable to assume that removal of invasive species like ice plants would occur, causing potential sedimentation into the adjacent water body. This construction has potential for siltation and erosion into a water body. **Impact WQ-2 under the No Project Alternative would be reduced to less than significant (Class III) *and would be less than the proposed project.***

Impact WQ-3: Under the No Project, impacts associated with the addition of impervious surfaces adjacent to an impaired water body would not occur. It is reasonable to assume that impervious surfaces

would not increase by 25% in the foreseeable future. **Impact WQ-3 under the No Project Alternative would be eliminated *and would be less than the proposed project.***

Impact WQ-4: Under the No Project, impacts associated with the construction within a 100-year floodplain would not occur. It is reasonable to assume that the construction within the floodplain would not occur. **Impact WQ-4 under the No Project Alternative would be eliminated *and would be less than the proposed project***.

Under the No Project Alternative, most of the basic objectives of the proposed project would not be achieved.

6.5 Reduced Project Alternative

The reduced project alternative would reduce the residential units from 23 to 12 and the classrooms from 12 to 8. This would reduce the total surface area required to be graded and filled, the total parking spaces required, the size of the project, and the number of stories necessary to be built from 3 to 2.

Impact WQ-1: Under the Reduced Project, impacts associated with runoff from construction sites would occur. It is reasonable to assume that substantial construction from the implementation of Lagoon Road would increase the amount of pollutants present on site, increasing the amount of pollutants in storm water runoff during construction. Due to the decrease in construction necessary, however, the total time of construction would decrease reasonably to around 1 year. This would prevent construction during the wet season, reducing total stormwater runoff during construction. **Impact WQ-1 under the Reduced Project Alternative would be potentially significant, but feasibly mitigated (Class II), *and would be similar to the proposed project.***

Impact WQ-2: Under the Reduced Project, impacts associated with construction and grading that could result in substantial sedimentation and siltation would still occur. The construction of Lagoon Road would remain the same due to the necessity of its width for fire safety. The main contribution of sedimentation and erosion to the Campus Lagoon would originate from construction of the access road. Since no change to the access road would occur, **Impact WQ-2 under the Reduced Project Alternative would remain significant and unavoidable (Class I), *and would be similar to the proposed project.***

Impact WQ-3: Under the Reduced Project, impacts associated with impervious surface-induced runoff from operation would still occur. Although the total surface area of the project would decrease with fewer classrooms and residential units, it is reasonable to assume that the impervious surfaces on the project site would increase by over 25%. The location is still adjacent to an impaired water body. Under the Reduced Project Alternative, **Impact WQ-3 would be reduced to less than significant (Class II) and *would be similar to the proposed project.***

Impact WQ-4: Under the Reduced Project, impacts associated with construction within a 100-year floodplain would still occur. The extension of Lagoon Road lies within the 100-year flood plain and is at risk of flooding from both the Lagoon and damage from the ocean. Because the access road remains the same as the proposed project, **Impact WQ-4 would be reduced to less than significant (Class II) and *would be similar to the proposed project.***

6.6 Reconfigured Project Alternative

The proposed project would have 23 units and 12 classrooms and remain on-site, but the access road would be relocated to come in from the west instead of the north (see Figure 6-1). Additionally, the parking spaces would be placed underneath the proposed site instead of atop it.

Impact WQ-1: Under the Reconfigured Project, impacts associated with runoff from construction sites would occur. It is reasonable to assume that the reconfiguration of the access road would reduce pollutant runoff because it is not being constructed directly adjacent to the Campus Lagoon. **Impact WQ-1 would be reduced to potentially adverse but less than significant (Class II) and *would be similar to the proposed project.***

Impact WQ-2: Under the Reconfigured Project, impacts associated with substantial erosion and siltation into a water body would occur. It is reasonable to assume that the reconfiguration of the access road would reduce sediment from accumulating along the Lagoon. The excavation required for the parking spaces, however, would increase the amount of total grading required, thus increasing possible sedimentation and erosion. **Impact WQ-2 would be reduced to potentially adverse but less than significant (Class II) and *would be less than the proposed project.***

Impact WQ-3: Under the Reconfigured Project, impacts associated with the increase in impervious surfaces and runoff during operation would occur. It is reasonable to assume that the increase in impervious surfaces on-site would be greater than 25%. The Reconfigured Project is still located adjacent to an impaired water body, providing substantial risk for pollutant runoff during operation. **Impact WQ-3 would be reduced to potentially adverse but less than significant (Class II) and *would be similar to the proposed project.***

Impact WQ-4: Under the Reconfigured Project, impacts associated with construction within a 100-year floodplain would not occur. It is reasonable to assume that the proposed access road under the Reconfigured Project would not be located within the 100-year flood plain (see Figure 6-1). **Impact WQ-4 would be eliminated and *would be less than the proposed project.***

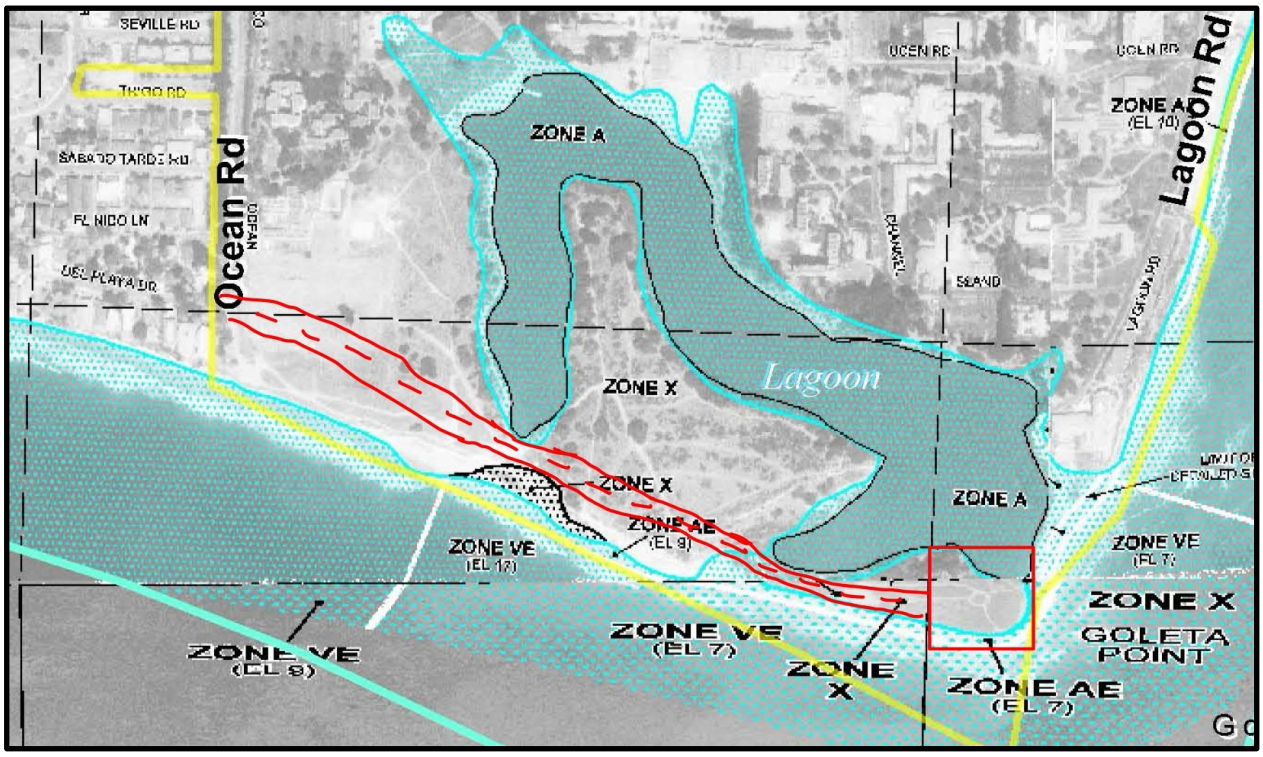


Figure 6-1. FEMA Flood Hazard Map with Reconfigured Access Road

6.7 Off Site Project Alternative

The proposed off-site project is located on the northeastern portion of campus at the location where Ocean Road Housing is proposed (see Figure 6-3). The proposed site does not lie within substantial proximity to any water body. The two water bodies of concern that lie within the same watershed as the proposed off-site project are the Campus Lagoon and the Goleta Slough (UCSB 2010).

Locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR, per CEQA 15126.6 (f)(2a). The proposed project location would have a minimal effect on water resources because it is located a substantial distance away from major water bodies.

Impact WQ-1: Under the Off-Site Project Alternative, impacts associated with runoff from construction sites occur. It is reasonable to assume that substantial construction would occur, increasing the quantity of pollutants entering stormwater runoff, hindering water quality standards. **Impact WQ-1 under the Off-Site Alternative would be reduced to potentially adverse but less than significant (Class III) and *would be less than the proposed project.***

Impact WQ-2: Under the Off-Site Project Alternative, impacts associated with construction activity resulting in substantial on-site erosion or siltation would occur, but not to the extent of the proposed project. It is reasonable to assume that erosion from grading would occur, however, the distance from any major water is significant. Although the off-site project drains into the Campus Lagoon, the large distance of off-site project from the Lagoon would indicate minimal sedimentation from stormwater runoff. **Impact WQ-2 under the Off-Site would be potentially adverse but mitigations reduce it to less than significant (Class II)** ***and would be less than the proposed project.***

Impact WQ-3: Under the Off-Site project alternative, impacts associated with the addition of impervious surfaces adjacent to an impaired water body would not occur. It is reasonable to assume that impervious surfaces would increase by 25%. The off-site project, however, is not located within close proximity of an impaired water body. **Therefore, Impact WQ-4 under the No Project Alternative would be potentially adverse but reduced to less than significant (Class III) and** ***would be less than the proposed project.***

Impact WQ-4: Under the Off-Site project alternative, impacts associated with the construction within a 100-year floodplain would not occur. It is reasonable to assume that the construction within the floodplain would not occur. **Impact WQ-4 under the No Project Alternative would be eliminated (Class IV) and** ***would be less than the proposed project.***

Most of the basic objectives would be achieved with the alternative; 23 faculty residential units and 12 classrooms would be included in the alternative. Views of the Santa Ynez Mountains would provide attractive scenery. It is reasonable to assume the location along the northeastern portion of campus is feasible for students to commute within 15 minutes by walking.

Figure 6-3. Proposed Off-Site Project Alternative Located at Site 37

6.8 Environmentally Superior Alternative

The No Project alternative is the environmentally superior alternative, however "the EIR shall also identify an environmentally superior alternative among the other alternatives" (CEQA Guidelines 15126.6 (e)(2)). **The alternative that has the greatest ability to reduce the severity of most of the significant project impacts is the Offsite Alternative (see Table 6-1).**

Table 6-1. Comparison of Project Alternatives

Impact	Proposed Project	No Project Alt.	Reduced Alt.	Reconfigured Project Alt.	Offsite Alt.
WQ-1: Runoff during construction	Class II	None (-)	Class II (=)	Class II (=)	Class II (=)
WQ-2: Sedimentation and erosion during construction	Class I	Class III (-)	Class I (=)	Class II (-)	Class III (-)
WQ-3: Runoff during operation	Class II	None (-)	Class II (=)	Class II (=)	Class III (-)
WQ-4: Location within 100-year floodplain	Class II	None (-)	Class II (=)	None (-)	None (-)

Note: Impacts with (-) would be less than project.
Impacts with (=) would be equal to project.
Impacts with (+) would be greater than project

7.0 PUBLIC COMMENTS AND RESPONSE

Public participation is an essential component of the environmental impact report review process. Comments should sufficiently address the adequacy of sections of the EIR (CEQA 15201).

GOLETA POINT FACULTY HOUSING/CLASSROOM PUBLIC COMMENT #1

March 10, 2025

Isla Vista, CA

Dear Vikesh Dheeriya,

On behalf of the Santa Barbara City Planning Environmental Planning Committee, thank you for submitting your Draft EIR. The committee has completed their review of your DEIR. We have made several comments reviewing the proposed Goleta Point Faculty Housing/Classroom project. These comments are forwarded for use in preparing your finalized EIR. Should you need any further information or clarification on comments, we recommend you reach out directly to the firm's environmental planning committee.

1. Incomplete details on Landscaping

In Section 2.5.4 Landscaping, Removal of vegetation needed? Inclusion of species removed is provided, however provide inclusion of any species needed to be removed in addition to the landscaping. Additionally, include any species that may use it as habitat. Incomplete details on landscaping may affect proper assessment of biological setting and indirect effects on water quality.

2. Incomplete details regarding mitigation measure inspections and regulations

In Section 4.2.3 Mitigation Measures MM WQ-1, the discussion on how often inspections should be done in order to ensure compliance is missing. Please include whether construction would halt as well as whether or not this mitigation measure would continue past the construction period. Include specifics on recurring dates as well as qualifications needed for inspection. Incomplete information would affect proper assessment and ability to maintain mitigation measures and/or maintain water quality.

3. Incomplete details on BMP maintenance.

In Section 4.2.3 Mitigation Measures MM WQ-1. Some BMPs need maintenance for continued functionality. The committee requests further information regarding long term effectiveness and maintenance of BMPs mentioned in MM WQ-1. Incomplete information may affect proper assessment of water quality.

4. Maintain Terminology

Throughout the draft EIR, unless necessary, maintain cohesion for terms like storm water as one repetitive name storm water or stormwater without a space to maintain cohesion. Global revisions

required.

Sincerely,

William Dohn

GOLETA POINT FACULTY HOUSING/CLASSROOM PUBLIC COMMENT #1 RESPONSE

1. Incomplete details on Landscaping

The Section 2.5.4 Landscaping in the DEIR will be revised to include the fact that the removal of vegetation would be needed. The revisions below will be included within Section 2.5.4.

Vegetation around the Campus Lagoon that may potentially be removed includes exotic rip-gut brome grass (Bromus diandrus), wild radish (Raphanus satirus), scarlet pimpernel (Anagallis arvensis), Eucalyptus species, sheep sorrel (Rumex acetosella) and iceplant.

The changes made to the DEIR will not result in substantial changes and therefore will not result in recirculation.

2. Incomplete details regarding mitigation measure inspections and regulations

This comment addresses a valid concern with the MM-WQ1 within the DEIR. It will be revised to include inspection frequency. The following revisions will be added to MM-WQ1.

According to the publicly available 2014 UCSB Stormwater Guidance Documents, inspections during construction would be done **weekly** by either of the following departments at UCSB: Design and Construction Services, Environmental Health & Safety, and Facilities Management. Post-construction inspections are done **continuously**. Specific inspection dates are not currently available but will remain consistent with UCSB construction guidelines.

The changes made to the DEIR will not result in substantial changes and therefore will not result in recirculation.

3. Incomplete details on BMP maintenance.

This comment addresses a lack of information regarding maintenance frequency for the proposed Best Management Practices under the Stormwater Pollution Prevention Plan within MM-WQ1. The following revisions will be added to the MM-WQ1.

The DEIR will be revised to include maintenance frequency for Best Management Practices within the Stormwater Pollution Prevention Plan. Departments such as Design and Construction Services, Environmental Health & Safety, Facilities Management, and Grounds Services are responsible for implementing the maintenance schedule for every structural BMP throughout UCSB **annually**. Adherence to these strict maintenance schedules ensures the function of BMP's is adequate to minimize water quality degradation.

The changes made to the DEIR will not result in substantial changes and therefore will not result in recirculation.

4. Maintain Terminology

Both storm water and stormwater are used interchangeably. This comment does not address the adequacy of the EIR analysis, and no response is necessary.

8.0 REFERENCES

Association of Environmental Professionals. (2024). *2024 California Environmental Quality Act (CEQA) statute and guidelines handbook*. Association of Environmental Professionals.

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4.5