Stow Grove Park Master Plan

Draft Initial Study – Mitigated Negative Declaration

prepared by

City of Goleta
Department of Neighborhood Services
130 Cremona Drive, Suite B
Goleta, California 93117
Contact: JoAnne Plummer, Parks and Recreation Manager

prepared with the assistance of

Rincon Consultants, Inc.
319 East Carrillo Street, Suite 105
Santa Barbara, California 93101

August 2023

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
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Initial Study

1. Project Title

Stow Grove Park Master Plan

2. Lead Agency Name and Address

City of Goleta
Department of Neighborhood Services
130 Cremona Drive, Suite B
Goleta, California 93117

3. Contact Person and Phone Number

JoAnne Plummer, Parks and Recreation Manager
805-562-5505

4. Project Location

The project is located in a residential area of the City of Goleta at 580 North La Patera Lane. Cathedral Oaks Road runs along the north side of the park. Figure 1 shows the regional location of the project in Santa Barbara County. The project site is approximately 11.75 acres and includes the entirety of Stow Grove Park (Assessor Parcel Number (APN) 077-160-009). Figure 2 shows the specific project location and its neighborhood context.

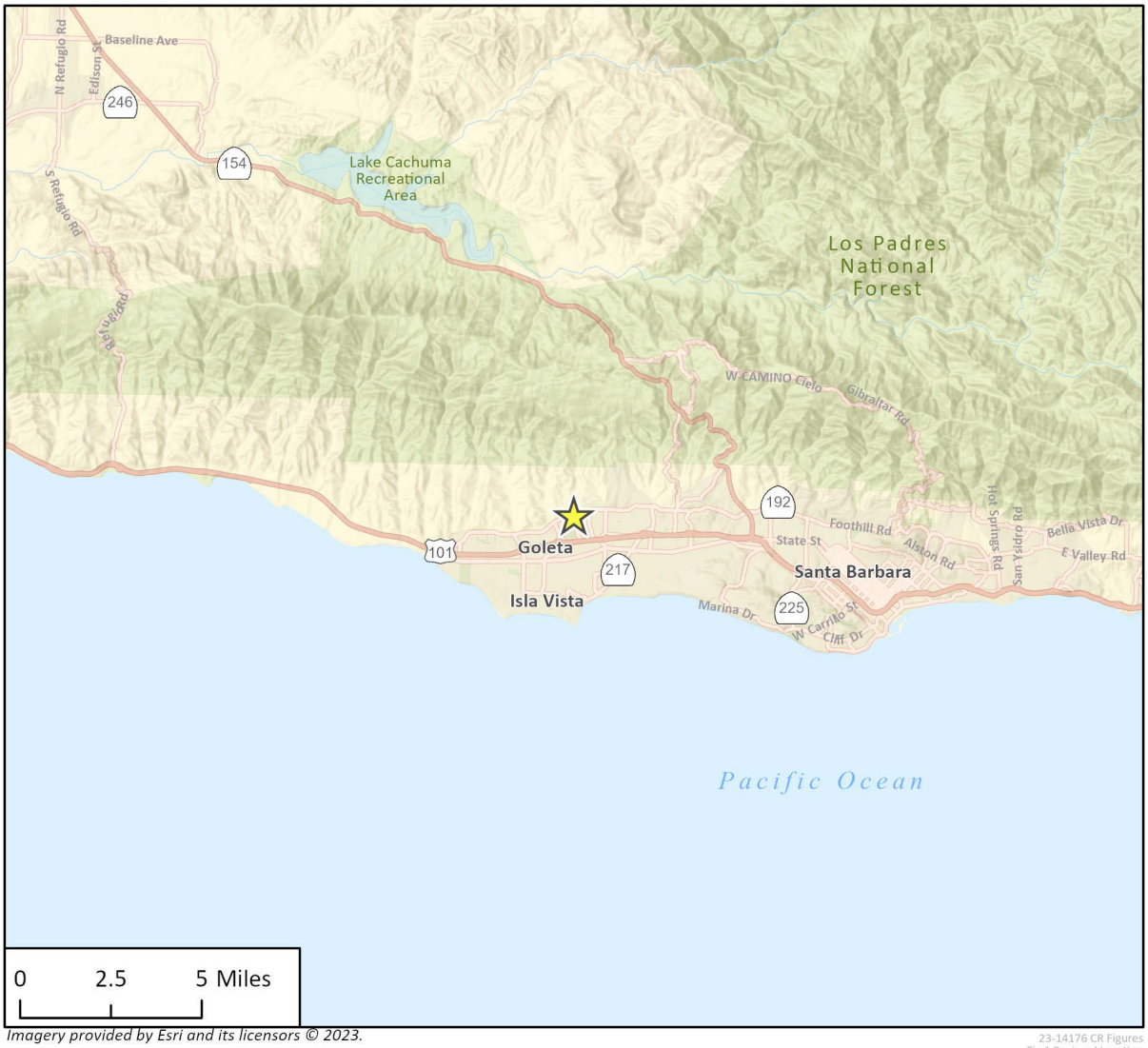
5. General Plan and Zoning Designation

The project site has a land use designation of Open Space - Active Recreation and is zoned Open Space Active Recreation (OSAR).

6. Project and Project Site Background

The earliest agricultural pioneers in the project area included the Hollister Ranch, Cooper Ranch, and Stow Ranch. What is currently Stow Grove Park was part of Stow Ranch. During this period, it was used as an unofficial gathering spot for members of the Stow Family and locals alike, who referred to the redwood grove as Stow's Grove. The grove was surrounded by lemon orchards owned by the family who lived in the Stow House southwest of the park. Stow Grove Park was donated to the County of Santa Barbara in 1964 and developed for active recreation.

Figure 1 Regional Location



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23-14176 CR Figures
Fig 1 Regional Location

Project Location

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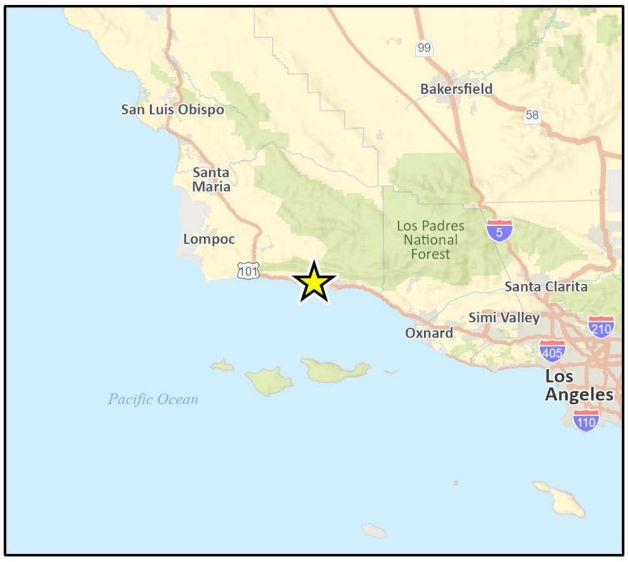
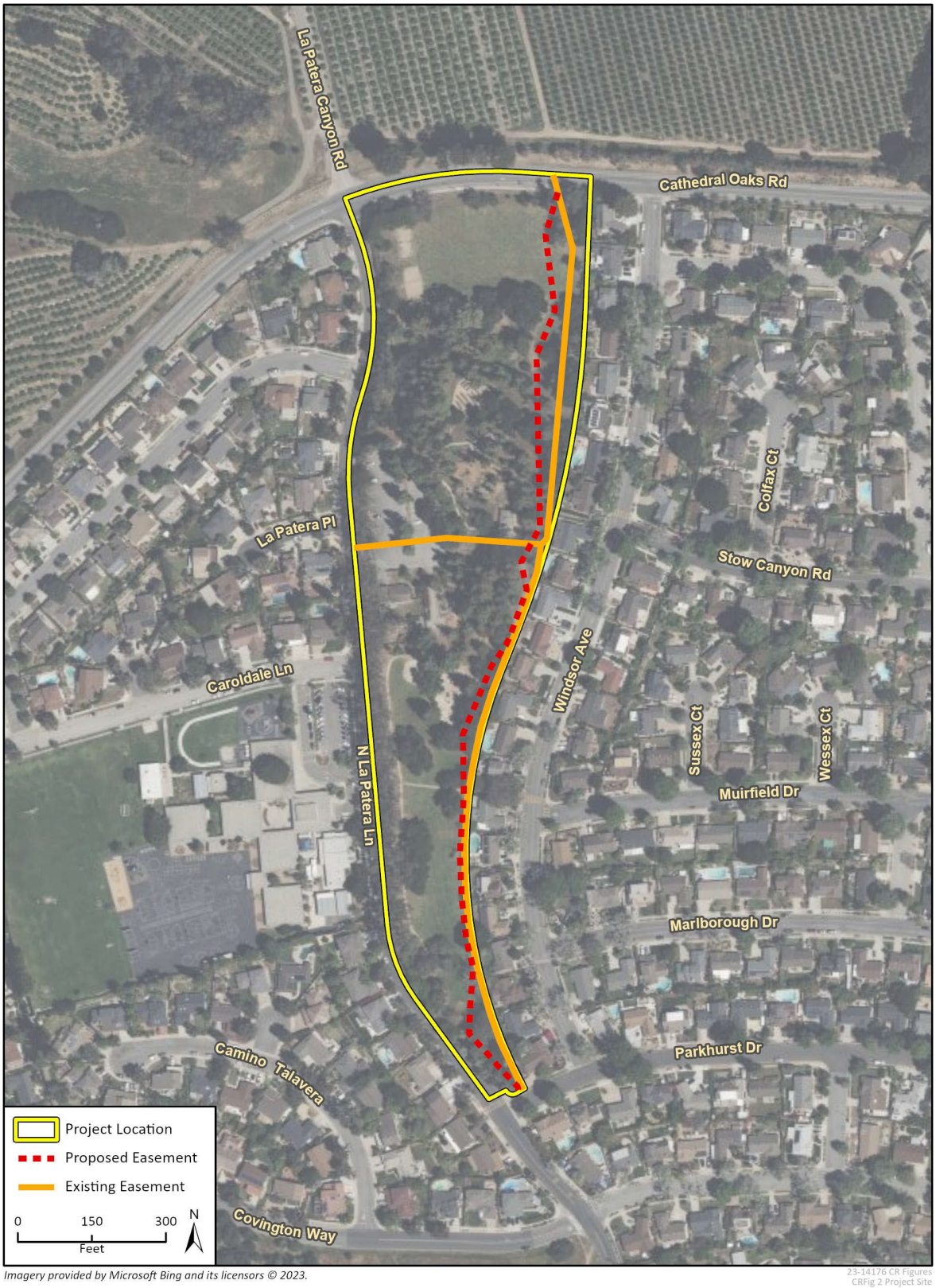


Figure 2 Project Location



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23-14176 CR Figures
CRFig 2 Project Site

*The Master Plan boundary terminates at the end of the park limits along Cathedral Oaks Road. The boundary depicted in Figure 2 illustrates County of Santa Barbara parcel data.

The City's General Plan/Coastal Land Use Plan (General Plan), adopted in 2006, requires the preparation of a citywide Park System Master Plan and individual Park Management Plans in Open Space Element Implementation Actions OS-IA-4 and OSIA-5, respectively. In 2015, the City's adopted Recreation Needs Assessment (RNA) identified a lack of available athletic fields for use by youth sports organizations. In January 2020, the City Council adopted the Parks, Facilities and Playgrounds Master Plan (PMP). The goal of the PMP's work effort was to complete a comprehensive assessment of Goleta's parks and playgrounds system, considering future growth in the community, and to guide maintenance, improvements, and related parks and playground development for the City of Goleta, consistent with the General Plan, over the next 10-20 years.

The PMP was intended to implement the vision of the Community Park designation, as detailed in the General Plan (see Table 3-1 of Open Space Element), while also reflecting community input regarding infrastructure improvements, in accordance with the Americans with Disabilities Act (ADA). City Council direction at its meeting of April 6, 2021, was to develop a Master Plan Design for Stow Grove Park consistent with the General Plan Open Space Element's Implementation Action OS-IA-5 Preparation of Individual Park Development and/or Management Plans. Similar to the Parks, Facilities and Playgrounds Master Plan for the entire City, park-specific master plans are intended to be used to determine resource development, expansion, maintenance, operation, and/or capital improvements and as a basis for pursuing funding opportunities for individual projects.

7. Description of Project

The project includes the development of the Stow Grove Park Master Plan (project) which envisions improved, new, expanded and renovated active and passive recreational park amenities at Stow Grove Park in the City of Goleta. The Master Plan includes 25 total components/amenities, of which nine are general park improvements, six are play/active, five are social/educational, and five are passive/nature based. The 25 components/amenities of the Master Plan are shown in Figure 3.

General Park Improvements

These nine improvements include alterations to the existing parking lot located on the western edge of the site, improvements to the existing restroom and installation of a new restroom, refurbishment of the existing maintenance facility with a trash enclosure, renovation of the caretaker cottage with potential opportunities for public use[1], horseshoe area, picnic areas, park entrances, and redwood grove/walking trails. The proposed general park improvements are shown in Figure 3 and described below in Table 1.

1 The caretaker's cottage is an existing on-site use which was previously occupied by a member of City staff. While the project includes operational improvements to the cottage for public use, the City may look to occupy the cottage by a City staff member again in the future.

Table 1 General Park Improvements

Amenity	Improvement Description
Parking Lot	Regrade and repave the existing parking lot to include a pass-through lane on the north end of the existing lot, introducing 200 square feet of paved area.
	Stormwater collection/drainage improvements (stormwater currently drains to the playground).
	Restripe the parking lot in accordance with Americans with Disability Act (ADA) requirements, including new ADA-compliant stalls
Existing Restroom	Repair exterior of the restroom building, upgrade utilities, and install ADA compliant upgrades.
New Restroom	Construct a ~375 square foot (sf) family and/or gender-neutral restroom.
Maintenance Facility	Reconfigure the existing maintenance area and install new fencing.
	Create a secondary entrance from North La Patera Lane for service vehicles only. Introduce ~1,400 sf of paved area that requires removal of one (placeholder for species) tree.
New Trash Enclosure	Construct a trash enclosure within the existing footprint of the maintenance facility containing floating trash bins.
Horseshoe Area	Install backboards, five new pits, benches/seating, curbing/edging, and placement of dirt at the horseshoe area. Existing horseshoe footprint would be maintained.
Park Entrances	ADA compliant upgrades (sidewalk accessibility) and install directional signage at the four Park entrances.
Existing Picnic Areas	Replacement and/or repair of broken picnic tables and existing shade structure, construct one new group picnic shade structure, new trash/recycle receptacles, repair barbeque equipment, and enhance signage and definition for the spaces of each picnic area.
Redwood Groves and Walking Trails/Entrances	Remove non-native plants, install mulching, plant native species, and repair fencing. Physical work requires use of hand tools only.

Play/Active Amenities

These six improvements include modifications to the existing playground, multi-use fields, walking/running paths, and volleyball courts and the introduction of a new fitness trail loop and nature/play area. The proposed play/active amenities are shown in Figure 3 and described below in Table 2.

Table 2 Play/Active Amenities

Amenity	Improvement Description
All Abilities Playground	Expand the playground by ~11,200 sf to the west of the existing playground[1]. Resurface with new equipment (swings, slides, spinners, sensory play elements, and create a larger inclusive play space).
Multi-Use Field	Refurbish the existing lawn at the northern portion of the park, install gopher deterrents, upgrade irrigation, and install a new fence backstop
Sand Volleyball Court	Remove one of the two existing sand pits, install new pole/netting, and introduce a new seating area around the perimeter.
Walking/Running Path	Install ~3,000 linear feet (lf) natural gravel/decomposed granite central walking/running path to connect the north side of the park to the south. This 8-foot-wide path would connect existing paths along the eastern edge, western loop in the southern portion, and western connection from the parking lot to the fields.
Fitness/Trail Loop	Create a ~1,000 ft long by up to 8 ft wide perimeter fitness trail/path around the multi-use field.
	Install five fitness equipment/pads (~200 sf each) at five locations surrounding the field.
	Total impact footprint includes ~13,000 sf [~9,000 sf of permanent disturbance (~8,000 sf of trail and ~1,000 sf of equipment pads) and up to~4,000 sf of temporary impact area].
Nature/Play Area	Install a new natural looking boulder course, balance logs, and other exploratory/nature play elements (such as a tree fort) in four use areas comprising ~1,670 sf.[2]

[1] There are three existing playgrounds, the project includes combining into one, expanded playground.
[2] The surface of the nature/play area would be a pour in place rubber surfacing material.

Social/Educational Amenities

These five improvements include rehabilitation to the Caretaker Cottage (to include a public use for education/social purpose), creation of a family activity area, and introduction of cultural, social, and educational amenities such as a Channel/Islands Plaza, entrance junction, and entry promenade. The proposed social/educational amenities are shown in Figure 3 and described below in Table 3.

Table 3 Social/Educational Amenities

Amenity	Improvement Description
Caretaker Cottage	Rehabilitate the cottage to provide shared use as a classroom, education or nature center.
	Install ~1,100 sf of decorative permeable paving to the walkway and install a new bioswale for stormwater collection
Family Activities Area	Allocate ~1,000 sf of rentable passive space for family activity, such as corn hole, bounce houses, ping pong, etc. No physical improvements and ground surface would remain permeable (i.e., mulch, dirt, grass).
Channel Islands Plaza	Introduce interpretive signage of Channel Islands flora at southern entrance.
Entrance Junction	Provide decorative boulders and directional signage at the intersection of the central internal pathway/trails.
Entry Promenade	Install ~2,800 sf of decorative permeable paving leading up the proposed entrance junction. The area would be vehicle accessible from the parking lot to the north.
	Install a new bioswale for stormwater collection

Figure 3 Conceptual Master Plan

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23-14176 BIO
Fig 3 Master Plan

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Passive/Nature Based Amenities

These five improvements include upgrades to the general use field and native tree grove, and creation of interpretive/bird watching trails, a botanical garden, a butterfly/pollinator garden. The proposed passive/nature-based amenities are shown in Figure 3 and described below in Table 4.

Table 4 Passive/Nature Based Amenities

Amenity	Improvement Description
General Use Field	Regrade and reseed areas of the general use field, upgrade/trench the irrigation system, and install gopher deterrents.
Interpretive/Bird Watching Trails	Install seating areas and interpretive signs throughout existing trails for education, bird watching, and refuge.
	Install misters/fogging devices to provide redwoods with moisture at a higher zone than standard irrigation.
Botanical/Native Garden	Create a new native species botanical area under the existing redwood groves with educational tags for plants
Butterfly/Pollinator Garden	Install educational signs and a new seating area for reading/relaxing/outdoor gathering.
Native Tree Grove Trail	Install natural colored concrete and decomposed granite (DG) trail areas[1] with interpretive signs throughout the park.

[1] Concrete - ~56 lf of 8-foot width and ~1,200 lf of 5-foot width; DG -~800 lf of at 8-foot width and ~360 lf at 5-foot width

Easements

As shown in Figure 2, an existing water line easement is located along the eastern boundary of the park and also bisects the park through the middle in the east/west direction. This easement would be abandoned and a new easement would be established for a directionally drilled water line, maintained by La Patera Ranch. As shown in Figure 2, the new easement would run along the eastern boundary of the site, connecting to existing infrastructure underneath Cathedral Oaks Road.

Environmentally Sensitive Habitat Area

Stow Grove Park includes designated Environmentally Sensitive Habitat Areas (ESHA) in two locations. These areas and protective buffers contain existing park amenities, including three group picnic areas, horseshoe pits, a multi-use turf field, volleyball courts, restrooms, parking lot, and walking/biking trails. Proposed improvements located within ESHA include refurbishing the existing horseshoe and picnic areas, maintenance facility and caretaker cottage, as well as constructing the new restroom and all-abilities playground. Under Chapter 17.30.040 of the Goleta Municipal Code, no new development is allowed within ESHA and ESHA buffer, except for Capital Improvement Program projects, public accessways and trails, habitat restoration and enhancement projects when consistent with Sections 17.30.060(G) and 17.54.020(A)(6), and nature education and research activities.

Project Schedule/Construction Details

Planned improvements under the Master Plan are anticipated to be implemented over the next 5-15 years, beginning in 2024. Approximately 2,000 cubic yards of soil would be disturbed to implement planned improvements. Minor use of heavy machinery (grader, roller, paver, and asphalt mixing equipment) would be required.

8. Surrounding Land Uses and Setting

The project site is surrounded by Single Family Residential land uses to the east, west, and south. La Patera Elementary School is located across North La Patera Lane, west of the project site. The site is bordered by Cathedral Oaks Road to the north, the extent of City limits. Agricultural uses are to the north across Cathedral Oaks Road.

9. Other Public Agencies Whose Approval is Required

The City of Goleta is the lead agency for the project. There are no responsible or trustee agencies whose approval is required. A deed restriction will be updated with the Stow Family for the on-site water line easement and park improvements.

10. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

California Assembly Bill 52 of 2014 (AB 52) was enacted in 2015 and expanded CEQA by defining a new resource category, "tribal cultural resources." Pursuant to AB 52, consultation letters were delivered to California Native American Tribes by certified by email and certified mail on June 23, 2023 and July 5, 2023, respectively. As discussed in Environmental Checklist Section 18, *Tribal Cultural Resources*, two Tribes requested consultation: the Barbareño Band of Chumash Indians on July 12, 2023 and the Northern Chumash Tribal Council on July 14, 2023. The City held a virtual meeting with the Barbareño Band of Chumash Indians on July 14, 2023 and there was mutual agreement to notify the Tribe of future development plans and for the City to provide a copy of the CEQA compliant Cultural Resources Report. The City held a virtual meeting with the Northern Chumash Tribal Council on July 31, 2023, who requested an interpretive panel be incorporated into the project design, that a Chumash monitor be present during ground disturbing activities, and for the City to provide a copy of the CEQA compliant Cultural Resources Report. The City has complied with the tribal consultation requirements of AB 52.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

□	Aesthetics	□	Agriculture and Forestry Resources	□	Air Quality
■	Biological Resources	■	Cultural Resources	□	Energy
■	Geology/Soils	□	Greenhouse Gas Emissions	□	Hazards & Hazardous Materials
□	Hydrology/Water Quality	□	Land Use/Planning	□	Mineral Resources
□	Noise	□	Population/Housing	□	Public Services
■	Recreation	□	Transportation	■	Tribal Cultural Resources
□	Utilities/Service Systems	□	Wildfire	■	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

□ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

□ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

□ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

□ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

JoAnne Plummer	July 31, 2023
Signature	Date
JoAnne Plummer	Parks and Recreation Manager
Printed Name	Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	□	□	■	□
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	□	□	□	■
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	□	□	■	□
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	□	□	■	□

Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

The Visual and Historic Resources Element in the City's General Plan (2006) identifies views of scenic resources that are to be protected, which include:

- Pacific Ocean/Santa Barbara Channel
- Views of the Channel Islands
- Pacific shoreline, including beaches, dunes, lagoons, coastal bluffs, and open coastal mesas
- Goleta and Devereux Sloughs
- Creeks and vegetation associated with riparian corridors
- Agricultural areas, including those under production as well as fallow agricultural lands

- Lake Los Carneros and the surrounding woodlands
- Prominent natural landforms, such as the Santa Ynez Mountains and foothills

Figure 6-1, *Scenic and Visual Resources*, in the General Plan identifies important views of these resources throughout the City. Views of the Pacific Ocean, other scenic resources along the shoreline, riparian corridors, and Lake Los Carneros are not visible from the project site. Views of agricultural areas and the Santa Ynez Mountains and foothills are visible to the north from the project site. Proposed project improvements would occur within Stow Grove Park and would not obstruct northward views of agricultural land or the Santa Ynez Mountains and foothills, as improvements would be small-scale, and would not include the construction of large buildings or structures that may obstruct views. Proposed amenities would enhance the existing recreational character of the park. Therefore, the project would not have a substantial adverse effect on scenic vista. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Scenic highways are California highways designated by a local governing body and protected by the State Scenic Highway Program for the purpose of protecting and enhancing the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. U.S. 101 through the City is eligible for designation as a state scenic highway but is not officially designated. The nearest officially designated state scenic highway is Route 154, approximately 4.5 miles northeast of the project site (California Department of Transportation [Caltrans] 2018). As discussed in Environmental Checklist Section 5, *Cultural Resources*, there are no historic resources on the project site. The project would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings, within a state scenic highway. There would be no impact.

NO IMPACT

c. Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The project site is located in an urbanized, residential area, characterized by single-family homes typical of a suburban neighborhood. The project includes general park improvements, as well as new recreational, social, educational, and nature-based amenities, which would enhance the existing recreational and visual character of Stow Grove Park. As discussed in Environmental Checklist Section 11, *Land Use and Planning*, project improvements would be consistent with the open space active park land use designation and zoning of the project site. The project would not conflict with applicable zoning or other regulations that govern scenic quality, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

The project is located within a primarily urbanized area of Goleta. Existing sources of light include streetlights on adjacent roadways, vehicle lights, and existing sources of glare include reflection off vehicles. Potential new sources of light could arise from the installation of new light fixtures within the parking lot, restroom, and entrance areas. Project lighting would be designed in accordance with City standards, including Goleta General Plan Visual and Historic Resources Element Policy VH 4.12, Lighting, which requires outdoor lighting fixtures to be aimed downward or toward structures (if properly shielded), retrofitted if feasible, and maintained in order to prevent over-lighting, energy waste, glare, light trespass, and sky glow (City of Goleta 2006a). In addition, all proposed on-site lighting would comply with Chapter 17.35, Lighting, of the Goleta Zoning Ordinance, which prohibits all exterior lighting from being directed upwards and requires light to be fully shielded and fully cut off to prevent light from trespassing onto adjacent properties. Chapter 17.35 also requires the preparation of an outdoor lighting plan for review by the City to ensure compliance with lighting standards. The project would not include the installation or use of reflective/glare generating sources. The project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	□	□	□	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	□	□	□	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	□	□	□	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	□	□	□	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	□	□	□	■

Impact Analysis

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

The project site is located on land designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as Urban and Built Up Land (Department of Conservation 2018). As such, the project would not have the potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The project site is zoned Open Space Active Recreation (OSAR) and is not under a Williamson Act contract. Also, there are no lands that contain or are zoned as forest lands or timberlands in the City of Goleta. Therefore, the project would not result in environmental changes that would involve the conversion of agricultural land to non-agricultural use, or the conversion of forest lands to non-forest uses. There would be no impact.

NO IMPACT

3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	□	□	□	■
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	□	□	■	□
c. Expose sensitive receptors to substantial pollutant concentrations?	□	□	■	□
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	□	□	■	□

Overview of Air Pollution

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, volatile organic compounds (VOC)/reactive organic gases (ROC),[2] nitrogen oxides (NO_X), particulate matter with diameters of ten microns or less (PM_{10}) and 2.5 microns or less ($PM_{2.5}$), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROC and NO_X. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog).

Air pollutant emissions are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories:

- Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat.

[2] CARB defines VOC and ROC similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROC and VOC are considered comparable in terms of mass emissions, and the term ROC is used in this IS-MND.

- Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products.

Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and can also be divided into two major subcategories:

- On-road sources that may be legally operated on roadways and highways.
- Off-road sources include aircraft, ships, trains, and self-propelled construction equipment.

Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Air Quality Standards and Attainment

The project site is located in the South Central Coast Air Basin (SCCAB), which includes Santa Barbara County, San Luis Obispo County, and Ventura County. The project site is located in Santa Barbara County and is under the jurisdiction of the Santa Barbara County Air Pollution Control District (SBCAPCD). As the local air quality management agency, SBCAPCD is required to monitor air pollutant levels to ensure the NAAQS and CAAQS are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the SCCAB is classified as being in "attainment" or "nonattainment." In areas designated as non-attainment for one or more air pollutants, a cumulative air quality impact exists for those air pollutants, and the human health impacts associated with these criteria pollutants, presented in Table 5, are already occurring in that area as part of the environmental baseline condition. Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The Santa Barbara County portion of the SCCAB is designated a nonattainment area for the State 8-hour ozone standard and the State PM_{10} (particulate matter less than 10 microns in diameter) standard (SBCAPCD 2023) This nonattainment status is a result of several factors, including fuel combustion at industrial facilities, motor vehicle usage, consumer products, and marine vessels in the SCCAB.

Table 5 Health Effects Associated with Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Carbon monoxide (CO)	Reduces oxygen delivery leading to: (1) aggravation of chest pain (angina pectoris) and other aspects of coronary heart disease; (2) decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (3) impairment of central nervous system functions; and (4) possible increased risk to fetuses.
Nitrogen dioxide (NO_2)	(1) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (2) risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (3) contribution to atmospheric discoloration.
Sulfur dioxide (SO_2)	(1) Bronchoconstriction accompanied by symptoms that may include wheezing, shortness of breath, and chest tightness during exercise or physical activity in persons with asthma.
Suspended particulate matter (PM_{10})	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).[1]
Suspended particulate matter ($PM_{2.5}$)	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.
Lead	(1) Short-term overexposures: lead poisoning can cause (a) anemia, (b) weakness, (c) kidney damage, and (d) brain damage; (2) long-term exposures: long-term exposure to lead increases risk for (a) high blood pressure, (b) heart disease, (c) kidney failure, and (d) reduced fertility.

Source: USEPA 2021a

Air Quality Management

Because Santa Barbara County currently exceeds the State 8-hour ozone standard and the State PM_{10} standard, SBCAPCD is required to implement strategies to reduce pollutant levels to achieve attainment of the CAAQS. The 2001 Clean Air Plan (CAP) was adopted as the County portion of the State Implementation Plan (SIP), designed to meet and maintain clean air standards. The 2022 Ozone Plan (2022 Plan) is the tenth triennial update to the initial state Air Quality Attainment Plan adopted by the SBCAPCD Board of Directors in 1991 (other updates were done in 1994, 1998, 2001, 2004, 2007, 2010, 2013, 2016, and 2019). The 2022 Plan is the first attainment plan to address the State ozone standards only because the County has been designated "attainment" for the federal 8-hour ozone standards (SBCAPCD 2022a). Each of the ozone plan updates have implemented an "every feasible measure" strategy to ensure continued progress toward attainment of the state ozone standards. SBCAPCD implements a control measure strategy targeting NO_X and ROC emissions, which

are precursors to ozone (SBCAPCD 2022a). Many of these control measures also contribute to reductions in PM_{10} emissions.

Air Pollutant Emission Thresholds

The following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual and Guidelines Manual,* which have been adopted by the City, and Appendix G of the *State CEQA Guidelines*. Impacts would be significant if the project would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard;
3. Expose sensitive receptors to substantial pollutant concentrations; or
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Construction Emissions Thresholds

The County does not currently have quantitative thresholds of significance for short-term construction emissions. SBCAPCD recommends that construction-related NO_X, ROC, PM_{10}, and $PM_{2.5}$ emissions, from diesel and gasoline powered equipment, paving, and other activities, be quantified. According to the *Scope and Content of Air Quality Sections in Environmental Documents,* SBCAPCD recommends quantification of construction-related emissions and suggest a 25 tons per year threshold for ROC or NO_X as a guideline for determining the significance of construction impacts (SBCAPCD 2022b). This is a limit that requires offsets if the construction activity is for a project that requires SBCAPCD permits and also provides guidance for other construction projects involving standard grading and building activities. The City of Goleta has elected to use this threshold.

Standard dust control measures must be implemented for any discretionary project involving earthmoving activities, regardless of size or duration. According to SBCAPCD, proper implementation of these required measures reduces fugitive dust emissions to a level that is less than significant (SBCAPCD 2022b). Therefore, all construction activity would be required to incorporate the SBCAPCD requirements pertaining to minimizing construction-related emissions and demolition of existing structures. The City of Goleta also requires implementation of standard emission and dust control techniques for all construction, as outlined in the Conservation Element Policy CE 12.3 (City of Goleta 2006).

Operational Emissions Thresholds

As described in the County's *Environmental Thresholds and Guidelines Manual,* a project would have a significant air quality effect on the environment if operation would:

- Emit (from all sources, both stationary and mobile) more than 55 pounds per day for ROC or NO_X, or more than 80 pounds per day for PM_{10}.
- Emit more than 25 pounds per day of NO_X or ROC from motor vehicle trips only.
- Exceed the APCD health risk public notification thresholds adopted by the APCD Board (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than 1.0 for non-cancer risk).
- Be inconsistent with the latest adopted in federal and state air quality plans for Santa Barbara County.

Due to the relatively low background ambient CO levels in Santa Barbara County, localized CO impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards (SBCAPCD 2022b). As such, CO hotspot analyses are not required.

Methodology

Air pollutant emissions generated by project construction and operation were estimated using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod utilizes project-specific information, including the project's land use(s), square footage for different uses (e.g., parking lot, city park, strip mall), and location, to model a project's construction and operational emissions. The analysis reflects the construction and operation of the project as described under Section 7, *Description of Project*.

Construction emissions modeled include emissions generated by construction equipment used on-site and emissions generated by vehicle trips associated with construction, such as worker and vendor trips. CalEEMod estimates construction emissions by multiplying the amount of time equipment is in operation by emission factors. Construction of the project was analyzed based on the applicant-provided project characteristics, disturbance areas, and construction activities. CalEEMod defaults were used to determine an approximate construction schedule and construction equipment list. Although the proposed amenities would be constructed over the next 5-15 years, emissions modeling assumes a proposed start date of June 2024 and CalEEMod default phases, with project construction occurring over approximately six months. A six-month schedule was applied for modeling purposes as it provides a conservative total of maximum daily emissions. The following assumptions were included in the model based on details described under Section 7, *Description of Project*:

- Regrading and paving of the existing parking lot and new secondary maintenance entrance were modeled using the land use subtype "parking lot".
- The playground expansion and new restrooms were modeled using the land use subtype "city park".
- The multi-use field was modeled using the land use subtype "non-asphalt surface".
- Construction may require up to 2,000 cubic yards (CY) of ground disturbance. Therefore, it is conservatively assumed that half of this quantity (1,000 CY) would be exported offsite.

It is assumed that all construction equipment used would be diesel-powered. This analysis assumes that the project would comply with all applicable regulatory standards. In particular, the project would comply with SBCAPCD standard dust control measures and Conservation Element Policy CE 12.3, which requires site watering to reduce windborne emissions, covering haul trucks to reduce loose materials, enclosing stockpiles, and revegetating graded areas.

Operational emissions modeled include energy emissions, mobile source emissions, and area source emissions. Mobile source emissions are generated by vehicle trips to and from the project site. It is assumed that the project would generate a nominal increase in vehicle trips by visitors or maintenance staff. As discussed in Environmental Checklist Section 17, *Transportation*, the project would generate fewer than 110 vehicle trips per day. For the purposes of emissions modeling, the project is assumed to generate a conservative maximum of 110 vehicle trips per day. Mobile source emissions are based on the daily trip rate and CalEEMod defaults for trip lengths and fleet mixes for the "City Park" land use. Emissions attributed to energy use include natural gas consumption for space and water heating. Area source emissions are generated by landscape maintenance equipment, consumer products and architectural coatings.

Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The SBCAPCD Guidelines state that a project is consistent with the Clean Air Plan if its direct and indirect emissions have been accounted for in the Clean Air Plan's emissions growth assumptions. Therefore, the project as a whole would be considered to be inconsistent if the project's direct and indirect emissions have not been accounted for in the Clean Air Plan's emissions growth assumptions. In addition, a project would be inconsistent with the 2022 Ozone Plan if the project fails to incorporate all applicable control measures. The Clean Air Plan's direct and indirect emissions inventory for the County, as a whole, are reliant on population projections provided by the Santa Barbara County Association of Governments (SBCAG).

The project does not include any residential or commercial uses and would not directly or indirectly increase population growth. The proposed park improvements would provide amenities for local Goleta residents such as play structures, multi-use fields, well-maintained walking trails, restrooms, and improved parking. The project would result in a nominal increase in vehicle trips to and from the project site and would not conflict with transportation control measures (e.g., traffic flow improvements, trip reduction programs, parking management, bicycle and pedestrian programs). There are no other control measures in the 2022 Ozone Plan that are applicable to the project. Therefore, the project would not conflict with or obstruct the implementation of the 2022 Ozone Plan and there would be no impact.

NO IMPACT

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The Santa Barbara County portion of the SCCAB is designated nonattainment for the CAAQS for ozone and PM_{10}. The following subsections discuss emissions associated with construction and operation of the project.

Construction Emissions

Project construction would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment/vehicles as well as ROC emissions released during the drying phase of architectural coating. Table 6 summarizes the estimated maximum daily emissions of pollutants during project construction. As shown therein, construction-related emissions would not exceed applicable thresholds for construction impacts. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Construction related impacts would be less than significant.

Table 6 Estimated Maximum Daily Construction Emissions (lbs/day)

Construction Year	ROC	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
2024	3	13	11	<1	3	2
Thresholds	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

lbs/day = pounds per day; ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
Notes: See Appendix A for modeling results. Some numbers may not add up due to rounding. Emissions presented are the highest of the winter and summer modeled emissions.

Operational Emissions

Operational emissions are typically associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (e.g., appliances and space and water heaters) and mobile sources (e.g., vehicle trips to and from the project site). The project would result in operational emissions from area, mobile, and energy sources.

Table 7 summarizes the project's maximum daily operational emissions by emission source. As shown therein, operational emissions would not exceed the County's operational thresholds for criteria pollutants. Emissions of all criteria pollutants would be less than two percent of their respective total emissions thresholds. Additionally, mobile source emissions would not exceed the SBCAPCD threshold of 25 lbs/day for ROC and NO_X. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment, and impacts would be less than significant.

Table 7 Estimated Maximum Daily Operational Emissions (lbs/day)

Emissions Source	ROC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	<1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	1	<1	3	<1	<1	<1
Total	**1**	**<1**	**3**	**<1**	**<1**	**<1**
Thresholds	55	55	None	None	80	None
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**No**	**N/A**

lbs/day = pounds per day; ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
Notes: See Appendix A for modeling results. Some numbers may not add up due to rounding.

LESS THAN SIGNIFICANT IMPACT

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Certain population groups, such as children, the elderly, and people with health problems, are particularly sensitive to air pollution. Therefore, most sensitive receptor locations are schools, hospitals, and residences. Sensitive receptors in the project vicinity include single-family residences located immediately east and west of the project site as well as La Patera Elementary School located immediately west of the project site. Localized air quality impacts to sensitive receptors typically result from CO hotspots and toxic air contaminants (TACs), which are discussed in the following subsections.

Carbon Monoxide Hotspots

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 ppm or the federal and state eight-hour standard of 9.0 ppm (CARB 2016).

The entire SCCAB is in conformance with state and federal CO standards, and most air quality monitoring stations no longer report CO levels. As shown in Table 6, maximum daily CO emissions generated by project construction would be less than 0.1 pound. Furthermore, SBCAPCD indicates that localized CO impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards (SBCAPCD 2022b). Based on the low background level of CO in the project area, ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the project's low level of operational CO emissions, the project would not create new CO hotspots or contribute substantially to existing CO hotspots. Therefore, the project would not expose sensitive receptors to substantial CO concentrations, and localized air quality impacts related to CO hot spots would be less than significant.

Toxic Air Contaminants

TACs are defined by California law as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. The following subsections discuss the project's potential to result in impacts related to TAC emissions during construction and operation.

Construction

Construction-related activities would result in temporary project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts (CARB 2023) and is therefore the focus of this analysis.

Generation of DPM from construction projects typically occurs in a single area for a short period. Use of heavy machinery during construction of the project was modeled to occur over approximately 6 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure the person with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed

Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with a project (OEHHA 2015). Thus, the duration of the proposed construction activities (i.e., 6 months) is less than one percent of the total exposure period used for 70-year health risk calculations. Current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of 9, 30, and 70 years, which do not closely resemble the temporary and highly variable nature of construction activities, resulting in difficulties in producing accurate estimates of health risk (Bay Area Air Quality Management District 2017).

The maximum PM_{10} and $PM_{2.5}$ emissions would occur during site preparation and grading activities. These activities would last for approximately 12 days. PM emissions would decrease for the remaining construction period because construction activities such as building construction (new restroom), trail maintenance, and architectural coating would require less intensive construction equipment. While the maximum DPM emissions associated with site preparation and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. This would represent less than one percent of the total 30-year exposure period for health risk calculation. DPM generated by project construction would not create conditions where the probability is greater than one in one million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. Therefore, project construction would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant.

Operation

CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). The South Coast Air Quality Management District (SCAQMD) adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005)[3]. Together, CARB and SCAQMD guidelines recommend siting distances both for the development of sensitive land uses in proximity to TAC sources and for the addition of new TAC sources in proximity to existing sensitive land uses. City park/recreational land uses are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. It is expected that the temporary quantities of hazardous TACs utilized on-site (e.g., cleaning solvents, paints, landscape pesticides) for the types of proposed amenities would be below thresholds warranting further study under the California Accidental Release Program. Since the project would not include substantial TAC sources and is consistent with CARB guidelines, it would not result in the exposure of off-site sensitive receptors to significant amounts of carcinogenic or toxic air contaminants. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

[3] In 2017, SBCAPCD released a supplemental guidance document, *District Guidance for Development near Busy Roadways in Santa Barbara County*. This guidance document specifically addresses siting of sensitive uses near high-volume roadways and does not consider stationary sources of TAC emissions. Therefore, the recommended guidance from SCAQMD is used in this analysis.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust and during idling. However, these odors would be intermittent and temporary, ceasing upon completion, and odors disperse with distance. Overall, project construction would not generate other emissions, such as those leading to odors, affecting a substantial number of people. Construction-related impacts would be less than significant.

The project would comply with SBCAPCD Rule 303 (Nuisance), which prohibits the discharge of quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety or any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property (SBCAPCD 1978).

The project does not include amenities which have the potential to generate other emissions, such as those leading to odors, that would affect a substantial number of people. No operational impacts would occur.

LESS THAN SIGNIFICANT IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	□	■	□	□
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	□	■	□	□
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	□	□	□	■
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	□	□	■	
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	□	■	□	□
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	□	□	□	■

Setting

Rincon Consultants prepared a Biological Resources Assessment (BRA) in July 2023. The BRA, included as Appendix B, evaluated biological resources that occur, or have the potential to occur, within the park, based on results of field visits and a desktop review. The BRA provides an assessment of impacts to biological resources as a result of the project. In particular, the BRA addresses the potential for direct and indirect impacts to the monarch butterfly (*Danaus plexippus*), Cooper's hawk (*Accipiter cooperii*), and white-tailed kite (*Elanus leucurus*), and ESHAs. The following setting and analysis has been summarized based on information and analysis in the BRA.

Setting

The following habitats in Goleta and are identified as ESHA: marine resources, beach and shoreline resources, coastal dunes, coastal bluff scrub, foredune, oak woodlands/savannah, dense stands of native grasslands, all wetlands such as vernal pools, riparian habitats, monarch butterfly overwintering roosts, raptor roosts and nests, and habitats that support special status-plant and wildlife species. In the Conservation Element of the Goleta General Plan/Coastal Land Use Plan, ESHAs in Goleta are generally mapped in Conservation Element Figure 4-1 (updated 2023). However, per General Plan Policy CE 1.3, any area not designated on the ESHA map in Conservation Element Figure 4-1 that meets the ESHA criteria shall be granted the same protections as if the area was shown on the map. As depicted in Conservation Element Figure 4-1, a portion of the project site is designated as ESHA, including coast live oak woodland and the eucalyptus grove that provides habitat for monarch butterfly aggregations (City of Goleta 2023).

Impact Analysis

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Special Status Plant Species

Based on database and literature review, as well as the field reconnaissance survey, 28 special status plant species are known or have the potential to occur in the project site (Appendix B). No special status plants are expected to occur within the project site, based on the altered vegetation communities and high levels of recurring maintenance and disturbance in the park. In addition, the project site is not located in any designated critical habitat or preserves for special status plant species and no special status plant species were observed during the field survey within the project site. Because no special status plant species are expected to occur on the project site, this impact would be less than significant.

Special Status Wildlife Species

Based on database and literature review, 54 special status wildlife species are known or have the potential to occur in the vicinity of the project site (Appendix B). Of these 54 species, three have a moderate or higher potential to occur, the monarch butterfly, and two raptors, Cooper's hawk and white-tailed kite. No special status wildlife species were observed during the field survey and no designated critical habitat for threatened or endangered species is designated within the project site (Appendix B).

The remaining 51 special status species are not expected to occur based on the BRA's evaluation for potential to occur. Impacts to these species would be less than significant. The species reasonably anticipated to occur were determined based on the published ranges of the species and the type, extent, and condition of habitat available at the site. The monarch butterfly and raptor species with potential to occur in the project site are described below.

Monarch Butterfly – California Overwintering Population

Removal of or damage to trees that create monarch butterfly overwintering habitat/ESHA may directly impact the quality of roosting habitat. The creation of a secondary entrance to North La Patera Lane that requires the removal of one coast live oak tree is not anticipated to have a substantial impact on the long-term suitability of the monarch habitat, although removal could alter wind protection to roosting monarchs. Construction, grading and trenching for project improvement elements may adversely impact tree root zones and affect their longevity to provide shelter for roosting monarchs.

Construction activities with heavy machinery and work crews have the potential to disturb and disrupt the overwintering behavior of monarch butterflies in the Stow Grove ESHA if conducted during the monarch overwintering season (Oct 15 - April 15) and nesting bird season (generally January 15 - August 15). Overwintering monarch butterflies have the potential to be impacted in the short-term by direct impacts to or disturbance of suitable habitat during the overwintering season. This would be a potentially significant impact.

Mitigation Measures BIO-1 and BIO-2 outline specific procedures to follow prior to and during construction and require preparation of a Monarch Roosting Protection Plan and Tree Removal and Monarch Roost Protection Plan introducing minimization efforts. Mitigation Measure BIO-3 requires preparation of a landscaping plan outlining specific limitations on types of pollinator species to be planted and insecticide/herbicide, toxic substance use during maintenance. Construction activities causing ground disturbance could impact tree roots and subsequently tree health, resulting in impacts to the monarch habitat. Mitigation Measure BIO-5 requires tree protection measures to ensure that impacts to mature native (protected) trees are minimized to the extent feasible or avoided, consistent with Policy CE 9 prior to the start of project activities. With implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4, potential short-term direct and indirect impacts to monarch butterflies and monarch butterfly ESHA would be reduced to a less than significant level. In addition to these required mitigation measures, the project incorporates elements such as the Butterfly/Pollinator Garden, which would improve the quality of the monarch butterfly overwintering habitat in the long term, further reducing potential impacts to monarch roosting habitat.

Raptors and Nesting Birds

The project site contains suitable habitat to support regulated nesting birds protected under the CFGC Section 3503 and the MBTA (16 United States Code §§ 703–712). Potential nesting locations for raptors were observed throughout the project site during the field survey, with the most suitable locations being mature native and non-native trees (e.g., eucalyptus, sycamore, cottonwood, coast live oak). An inactive historic nest was observed in the redwood trees within the project site during the tree survey. The Santa Barbara Audubon Society's Breeding Bird portal shows observations of great horned owls tending young owls as recently as 2019, and Cooper's hawk doing the same in 2009. Although white-tailed kites are fully protected species that could be indirectly impacted by construction disturbance within its 0.5-mile foraging range during breeding season, foraging habitat for the kite is poor and no changes to the open foraging areas would occur (Appendix B).

Raptors and nesting birds (including special status species Cooper's hawk and white-tailed kite) may be directly impacted if individuals and/or active nests are present in the work area through direct mortality, physical impacts to active nests, or causing abandonment of nests. Additionally, indirect impacts from noise and human presence may cause disturbance if active nests or foraging individuals are within the vicinity of construction and could ultimately result in nest failure. This is a potentially significant impact.

Mitigation Measure BIO-5 would require a pre-construction nesting bird survey to identify presence, and avoidance measures to follow, if present. With implementation of Mitigation Measure BIO-5 direct and indirect impacts to nesting birds would be reduced to a less than significant level.

In addition to this required mitigation, the project's restoration and habitat enhancements, including eucalyptus and native understory planting, would improve long-term habitat for raptors and nesting birds, further reducing potential impacts to these species.

Mitigation Measures

BIO-1 Monarch Butterfly Roost Protection

The City will implement measures to avoid and minimize indirect impacts on monarch butterfly overwintering roosts consistent with Policy CE 4. Construction activities (including tree/vegetation removal and infrastructure improvement) within 200 feet of monarch butterfly ESHA shall be scheduled to occur between April 1 and September 30 where feasible, to avoid overwintering monarch butterflies.

If construction and infrastructure improvement activities within 200 feet of monarch butterfly ESHA cannot feasibly be scheduled to avoid the overwintering season, the following measures shall be implemented prior to construction activities (including tree/vegetation removal and/or infrastructure improvement):

- A monarch specialist or qualified biologist shall conduct a survey for roosting monarchs prior to the start of work and confirm the absence of roosting monarchs before the work can commence. Roosting monarch surveys must follow the Xerces Society Protocol (2022). Surveys shall be conducted in the early morning while temperatures are low enough that monarch butterflies remain clustered from the evening before (usually when temperatures are below 13 °C or 55 °F).
- During the overwintering season and during construction and infrastructure improvement activities that occur, roosting monarch surveys shall be conducted weekly to confirm continued absence or to identify, map, and describe roost locations if presence of roosting monarchs is confirmed. Mapped roosting locations may be adjusted as needed under the guidance of a monarch specialist or qualified biologist.
- Any construction, infrastructure improvement activities, or tree/vegetation removal within 200 ft of roosting monarchs within the monarch butterfly ESHA shall be prohibited (consistent with CE 4.5 and CE 4.6d).
- A monarch specialist or qualified biologist shall be present to document monarch butterfly protection. The monarch monitor shall document that roosting monarchs are not disturbed by work activities. The monarch monitor shall have authority to stop work if monarchs show signs of unnatural disturbance.
- Trees removed from the monarch butterfly ESHA and trees heavily impacted by construction, grading, and trenching of the project improvement elements within the monarch butterfly ESHA

shall be replaced at a 2:1 ratio within the ESHA and as close to the removed tree as is reasonably feasible.

Plan Requirements and Timing: This condition shall be noted on any project plans. For construction during the overwintering season, prior to construction. The biological monitor shall be approved by the City prior to issuance of grading or building permits. **Monitoring**. If construction occurs during the overwintering season, surveys shall be conducted to determine presence or absence of roosting monarchs. If monarchs are not present, no buffer or monitoring are required. If monarchs are present, the requirements apply during the overwintering season, prior to any grading or construction and throughout all development activities until occupancy clearance issued.

BIO-2: Tree Removal and Monarch Roost Protection Plan

A Tree Removal and Monarch Protection Plan is required prior to any Monarch ESHA tree removal consistent with Policy CE 4. The Plan shall include the following.

- Removal of trees of any diameter possessing living foliage is prohibited within the monarch butterfly ESHA unless a tree is identified as an imminent hazard to property or life, is dead, or is otherwise approved by the City Arborist consistent Policy CE 4. Trees being considered for removal shall be evaluated and approved by both a certified arborist and a monarch specialist or qualified biologist for critical habitat protection before project work commences (consistent with Policy CE 4.4).
- Trees removed from the monarch butterfly ESHA and trees heavily impacted by construction, grading, and trenching of the project improvement elements within the monarch butterfly ESHA shall be replaced at a 3:1 ratio within the ESHA and as close to the removed tree as is reasonably feasible.

Plan Requirements: The Tree Removal and Monarch Protection Plan shall be prepared and approved by the City prior to construction. **Monitoring and Reporting:** Trees planted as mitigation for this project will be mitigated through replacement plantings as described in Mitigation Measures BIO-1 and BIO-5. The trees and tree health shall be monitored at a minimum of twice annually. Annual monitoring reports, prepared by an arborist shall be submitted to the City for three consecutive years.

BIO-3 Pollinator Garden Landscape Plan

Prior to construction of the pollinator garden, a Landscape Plan with the proposed pollinator species shall be approved by the City. The Plan shall also limit the use of insecticides, herbicides, or other toxic substances by City employees and contractors in construction and maintenance. Invasive species shall be prohibited. A list of pollinator species is included in the *Stow Grove Park Monarch Butterfly ESHA-Impact Analysis and Minimization Measures* (Althouse and Meade 2023).

Plan Requirements and Timing: The Landscape Plan shall be approved by the City prior to construction. This condition shall be noted on any plans. M**onitoring:** City staff will spot check plants to confirm consistency with the approved Landscape Plan.

BIO-4 Tree Protection Measures

The following tree protection measures shall be implemented to ensure that impacts to mature native (protected) trees are minimized to the extent feasible or avoided, consistent with Policy CE 9 prior to the start of project activities All measures below will be conducted by or under the direct supervision of an ISA certified arborist:

- A certified arborist or qualified biologist shall monitor any ground disturbance or vegetation removal activities that have a potential to impact protected trees.
- A minimum 3-foot-tall snow fence shall be placed around the TPZ in areas where project activities have the potential to impact protected trees. Fencing shall be maintained and in place throughout the duration of these activities.
- Any grading, cut-and fill, trenching, or other ground disturbance shall be done slowly using hand tools as feasible to avoid ripping or tearing roots. Roots two inches or greater in diameter shall be avoided to the extent feasible.
- Any root pruning shall be done at a 90-degree angle with a clean sharp blade, and new cuts shall be wetted and covered with absorbent tarp or heavy cloth fabric until backfill is completed.
- No equipment or materials shall be stored within TPZs as feasible. In areas where vehicles or equipment may impact tree roots, steel plates shall be installed to protect the root zones as needed.
- Pruning shall be limited to only what is necessary for project activities. Inadvertent damage to limbs and branches from equipment shall be immediately trimmed with clean blades. All pruning shall rely on best practices as determined by the arborist.
- If any protected trees are damaged to the point where continued viability is threatened, as determined by a certified arborist, the tree will be replaced at a 3:1 ratio with like species grown from locally obtained seed. Replacement shall occur on site as feasible, or off site (within the same watershed) if on site replacement is not feasible. Replacement trees shall be monitored for a period of 5 years.

Plan Set Requirements and Timing: This condition shall be noted on any plans. The name and contact information for the arborist shall be submitted to the City prior to commencement of construction. **Monitoring:** For construction with the potential to impact protected trees, the arborist or qualified biological monitor shall be approved prior to the start of construction. Monitoring shall occur throughout all development activities with the potential to impact protected trees until occupancy clearance issued.

BIO-5 Pre-Construction Nesting Bird Surveys

- To avoid disturbance of nesting and special-status birds, including raptor species protected by the MBTA and CFGC, project activities including vegetation removal, ground disturbance, construction, and demolition shall occur outside of the bird breeding season (February 1 through August 31), if feasible.
- If work must begin during the breeding season, a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of project activities. The nesting bird survey shall be conducted inside the project footprint plus a 500-foot for raptors and special-status species and a 300-foot buffer for all other birds. Inaccessible parts of the survey area shall be scanned using binoculars. The survey shall be conducted by a City-approved biologist familiar with the identification of bird species known to occur in southern California communities.
- If active nests (those containing eggs, nestlings, or associated with dependent fledglings) are found on-site, an avoidance buffer shall be implemented around each nest and demarcated with fencing or flagging. The size of the buffers shall be determined by the biologist based upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site. No project activity shall occur inside a nest buffer until the biologist determines that the nest is no longer active.

- If no nesting birds are observed during pre-construction surveys, no further actions would be necessary.

Plan Requirements and Timing: This condition shall be noted on any plans. The name and contact information for the avian biologist shall be submitted to the City for approval prior to commencement of construction. **Monitoring:** If a nesting bird survey is required (construction occurs during the nesting bird season), the survey shall be conducted no more than seven days prior to initiation of project activities. A summary memo shall be submitted to the City for approval within 14 days of the survey.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

According to the CNDDB, one sensitive plant community, southern coastal salt marsh, has been documented within five miles of the project site; this community is not present within the project site (Appendix B). No other CNDDB sensitive plant communities were observed during the field survey and there are no riparian habitats present on the site (Appendix B).

Two types of ESHA are mapped within the project site: landscaped native upland woodlands, comprised of the trees and landscaped vegetation, and monarch butterfly and raptor roosting habitat, which is also comprised of trees. Construction activities including ground disturbance, improvements to existing buildings and infrastructure, and creation of new buildings and infrastructure could potentially impact ESHA. Specifically, construction activities causing ground disturbance could impact tree roots and subsequently tree health. This impact would be potentially significant.

Mitigation Measures BIO-1 and BIO-2 outline specific procedures to follow prior to and during construction and require preparation of a Monarch Roosting Protection Plan and Tree Removal and Monarch Roost Protection Plan introducing minimization efforts. Mitigation Measure BIO-3 requires preparation of a landscaping plan outlining specific limitations on types of pollinator species to be planted and insecticide/herbicide, toxic substance use during maintenance. Mitigation Measures BIO-4 and BIO-5 require tree protection measures and nesting bird surveys to identify presence, and procedures to follow if nests are found. With implementation of Mitigation Measures BIO-1 through BIO-5, potential project short-term direct and indirect impacts to special status species and ESHA would be reduced to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No waters, wetlands, or riparian vegetation that meet the standards for federal protection under jurisdiction of the United States Army Corps of Engineers, RWQCB, or CDFW were observed during the field survey and there are no waters or wetlands identified by the Conservation Element National Wetlands Inventory, or National Hydrography Dataset mapped within the project site (Appendix D). There would be no impact.

NO IMPACT

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The project site is not in an area identified as a wildlife corridor and the potential movement of wildlife through the project site is minimal given the densely developed nature of the site and adjacent properties to the south, east, and west (Appendix B). Although open space is present north of the project site, Cathedral Oaks Road is a substantial barrier to wildlife movement. The project would not impede wildlife movement and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As discussed in Environmental Checklist Item a, a portion of the project site is designated as ESHA, including coast live oak woodland and the eucalyptus grove that provides habitat for monarch butterfly aggregations. Project construction and operation has the potential to result in impacts to ESHA, thereby potentially resulting in conflicts with City policies intended to protect biological resources. Conservation Element Policies CE 1.1-1.3, 1.5, 1.6, 1.7, 1.9, and 1.10 define ESHA uses, development standards, on-site and off-site mitigation, setbacks/buffers, and management. Policy CE 4 relates to protection of monarch butterfly habitat areas, and Policy CE 9 relates to protection of native woodlands. Mitigation Measures BIO-1 through BIO-5 address potential project short-term direct and indirect impacts to special status species and ESHA by requiring implementation of a monarch roost protection plan, tree removal and monarch roost protection plan, preparation of landscape plan comprising of specific lists of species for planting/maintenance, implementing native tree protection measures, and requiring nesting bird surveys to identify presence.

Table 8 provides a consistency analysis, illustrating how the project would be consistent with policies protecting biological resources, with implementation of Mitigation Measures BIO-1 through BIO-5. Impacts would be less than significant with mitigation incorporated.

Table 8 City of Goleta Biological Resource Policy Consistency Analysis

Policy	Discussion
Policy CE 1: Environmentally Sensitive Habitat Area Designations and Policy.	
CE 1.1-1.3 and 1.5: ESHA Designation and Mapping	**Consistent.** ESHA has been designated and mapped consistent with Policies CE 1.1, 1.2, and 1.3 to the extent of current and previously designated ESHA. No map correction specified under CE 1.5 is required or proposed (Appendix B)
CE 1.4, 1.6, and 1.8: Protection of ESHAs and ESHA Buffers	**Consistent.** The public access improvement components of the project (e.g., walking/running path, fitness/ trail loop, parking lot replacement) are considered allowed use in ESHA under Policy CE 1.6.c. The butterfly/pollinator garden and native garden are considered allowed use (resource restoration and enhancement) under CE 1.6.d. The project was designed to minimize impacts to ESHA. All impacts would be mitigated to a less than significant level with implementation of required mitigation. The design requires minimal modification and alteration of natural landforms as possible. An ESHA buffer under CE 1.8 is not required since the project use is allowed to be located within ESHA.

Policy	Discussion
CE 1.7: Mitigation of Impacts to ESHA	**Consistent**. With implementation of Mitigation Measures BIO-1 through BIO-3 and BIO-4 potential project short-term direct and indirect impacts would be less than significant to monarch butterflies and monarch butterfly ESHA. Two trees are anticipated to be removed, one for the La Patera entrance and one for the maintenance facility refurbishment. Project impacts are mitigated through Mitigation Measures BIO-2 and BIO-5, which require tree replacements. Impacts to trees' roots and canopies would be mitigated through BIO-1, BIO-2, and BIO-4 for all project activities including for establishment of trails, improvements to buildings and infrastructure, and building of new structures. Potential direct and indirect impacts to nesting birds would be reduced by BIO-5 to less than significant. Environmental protection practices that describe best management practices during construction would be developed and included with the project construction specifications.
CE 1.9: Standards Applicable to Development Projects	**Consistent**. No night lighting or non-native species planting is proposed. The design preserves existing wildlife corridors and habitat networks and are of sufficient width to protect habitat and dispersal zones for small mammals, amphibians, reptiles, and birds. Stow Grove Park has been heavily modified from its natural landform and landscaped with both native and non-native woodlands and vegetation. With adherence to the site plan, development would minimize grading, alteration of current landforms and physical features, and vegetation clearance in order to reduce or avoid soil erosion, increased runoff, and reduced infiltration of stormwater and prevent net increases in baseline flows for any receiving water body.
CE 1.10: Management of ESHAs	**Consistent**. Construction impacts would be avoided though adherence to Mitigation Measures BIO-1 through BIO-5, including a prohibition on invasive species and limits on chemical use under BIO-3. Adherence to City and State stormwater requirements would ensure any grading during the rainy season would be conducted consistent with CE 1.10.j and would maintain the ESHA ecological functions.
Policy CE 4: Protection of Monarch Butterfly Habitat Areas	
CE 4.1 through4.3: Definition of Habitat Area, Designation of Monarch Butterfly ESHAs, and Site-Specific Studies and Unmapped Monarch ESHAs.	**Consistent.** Current and historical butterfly habitat and roosts have been recently mapped and identified as ESHA by the City. All suitable habitat in the project site have been surveyed according to City and current Xerces protocol.
CE 4.4: Protection of Monarch Butterfly ESHAs, CE 4.5 Buffers Adjacent to Monarch Butterfly ESHAs.	**Consistent**. The project components are allowed uses in monarch butterfly ESHA and has been sited to avoid impacts to aggregation sites and potential habitat. The only monarch butterfly ESHA vegetation removal proposed includes the removal of an individual eucalyptus tree located in the eucalyptus stand along the western boundary of the park. Removed trees would be replaced with the objective of monarch butterfly habitat restoration and enhancement.
CE 4.6: *Standards Applicable to New Development Adjacent to Monarch ESHAs*.	**Consistent.** Mitigation Measure BIO-1 requires construction to outside the overwintering period (April 1 to September 30), and avoidance measures if construction must occur during the overwintering season. Impacts to habitat as a result of tree removal would be addressed through BIO-1 and BIO-2
CE 8: Protection of Special-Status Species	**Consistent.** Direct and indirect impacts to nesting raptors (if present) in the project site would be avoided though adherence to BIO-1, BIO-2, and BIO-5.

Policy	Discussion
Policy CE 9: Protection of Native Woodlands	
CE 9.1, 9.2, and 9.4: Tree Protection Plan and Standards	**Consistent.** Based on Policy CE 9.1, 9.2, and 9.4, impacts (including removal, fragmentation of habitat, removal of understory, disruption of canopy, alteration of drainage patterns, siting of structures/roads/driveways) to mature native trees will be avoided or minimized to the extent feasible through project design and implementation of Mitigation Measures BIO-2 and BIO-4. Policy CE 9 does not include specific tree protection standards; as such, the tree protection measures include industry protection standards (measures to be implemented prior to, during, and after construction including methods of avoiding injury, damage treatment and inspections, activities permitted/prohibited within tree protection zones (TPZs), and monitoring requirements for work within TPZs). Mitigation Measure BIO-2 requires mitigation at a 3:1 ratio for removal of trees.
CE 9.3: Native Oak Woodlands or Savannas	**Consistent.** Native oak woodlands are mapped as ESHA within the project site and tree trimming, weed abatement, and brush clearance under the project would be the same as is currently being conducted, which is the minimum required to achieve public safety and habitat restoration. The project would not impact native oak woodlands.
CE 9.5: Mitigation of Impacts to Native Trees	**Consistent.** Based on Policy CE 9.5, mitigation for the removal of native trees shall include, at a minimum, the planting of replacement trees on site, if suitable area exists on the subject site, or off site (within the same watershed) if suitable onsite area is unavailable. Mitigation sites shall be monitored for a period of 5 years. The project is not anticipated to threaten the continued viability of any native trees. Encroachment into the TPZ would be minimized through project design and Mitigation Measures BIO-2 and BIO-4.

Source: Rincon Consultants, Inc. 2023; Appendix B

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The project is not within the coverage area of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (Appendix B). There would be no impact.

NO IMPACT

5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	□	□	□	■
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	□	■	□	□
c. Disturb any human remains, including those interred outside of formal cemeteries?	□	□	■	□

Rincon Consultants prepared a Cultural Resources Technical Report in July 2023, documenting background and archival research, records searches conducted for the project site, and Phase 1 and Extended Phase 1 survey testing results (Rincon 2023).[4] The following setting has been summarized based on information presented and cited in the Technical Report.

Setting

Indigenous History

The project site is in what is generally described as the Northern Bight archaeological region, one of eight organizational divisions of the state. The Northern Bight encompasses the northern portion of the California Bight, which is marked by the curve of the coastline along central California. The prehistoric cultural chronology for the Northern Bight is generally divided into six periods: Paleo-Indian Period (ca. 10,000 - 7000 BCE), Millingstone Period (7000 - 5000 BCE), Early Period (5000 - 2000 BCE), Middle Period (2000 BCE - 1 CE), Middle-Late Transition Period (1 - 1000 CE), and Late Period (1000 CE - Historic Contact).

Ethnographic Setting

The project site lies within Chumash ethnographic territory, which extends from the current city of Malibu, north beyond San Luis Obispo, and inland as far as 42 miles. The Chumash also inhabited the northern Channel Islands. The Chumash are divided into three main groups, including Interior, Coastal, and Northern Channel Islands Chumash. Although the Chumash languages are no longer commonly spoken (Timbrook 1990), many descendants of the Chumash still live in the region and a cultural revitalization has been ongoing since the 20th century. Today, the Santa Ynez Band of

[4] This report is confidential and therefore not included for public distribution. Archaeological site locations are exempt from the California Public Records Act, as specified in Government Code 6254.10, and from the Freedom of Information Act (Exemption 3), under the legal authority of both the National Historic Preservation Act (PL 102-574, Section 304[a]) and the Archaeological Resources Protection Act (PL 96-95, Section 9[a]).

Chumash Indians, whose reservation is approximately 17.5 miles northwest of the project site, is the only federally recognized Chumash tribe.

Local History

Following Mexican independence from Spain, the Goleta area was divided into two large land grants: Rancho Dos Pueblos and Rancho La Goleta, named for the sailing ship or "goleta", which wrecked several years earlier. After California officially became a U.S. state, the larger ranchos were subdivided into smaller, individual farms, and the Goleta Valley became an agricultural center known as a prominent lemon-growing region during the late 19th and 20th centuries. The earliest agricultural pioneers in the area included the Hollister Ranch, Cooper Ranch, and Stow Ranch, where the project site was originally located. What is currently Stow Grove Park was part of Stow Ranch. During this period, it was used as an unofficial gathering spot for members of the Stow family and locals alike, who referred to the redwood grove as Stow's Grove. The grove was surrounded by lemon orchards owned by the family who lived in the Stow House southwest of the park.

Agriculture continued to be the driving economic force in the area until the late 1950s when the completion of Cachuma Dam brought a reliable source of water to Goleta, the aerospace industry established offices, and the University of California, Santa Barbara was established in the area. Following these developments, new residents flooded into the area and single-family residential communities were constructed in the former agricultural fields, including those surrounding Stow Grove Park. To further support increased residential development, additional amenities and institutional facilities such as parks, hospitals, and schools were constructed. Stow Grove Park was donated to the County of Santa Barbara in 1964 and developed for active recreation. Goleta was incorporated as a city in 2002.

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

On May 16, 2023, Rincon submitted a records search request to the Central Coast Information Center (CCIC), located at the Santa Barbara Museum of Natural History. Rincon also reviewed the National Register of Historic Places (NRHR), the California Register of Historical Resources (CRHR), the California Historical Landmarks list, and the Built Environment Resources Directory (BERD), as well as its predecessor the California State Historic Property Data File. Additionally, Rincon reviewed the Archaeological Determination of Eligibility list.

Field survey and background research resulted in the identification of one historic-age property within the project site, Stow Grove Park. The property was recorded and evaluated on DPR forms for listing in the NRHP, CRHR, and local listing and was recommended ineligible for listing for all three under all criterions (Rincon 2023). Since Stow Grove Park is ineligible for listing in the NRHP, CRHR, and local designation, it is not considered a historical resource pursuant to the CEQA. Because there are no historical resources on the site, the project would not result in adverse change to the significance of a historical resource. There would be no impact.

NO IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

City staff requested a contact list of Native American Tribes culturally affiliated with the project area from NAHC on May 11, 2023. Rincon contacted the NAHC on May 16, 2023, to request a search of the Sacred Lands File (SLF) . On June 15, 2023, the NAHC responded to Rincon's request; the results of the SLF request were positive, indicating that a sacred land is recorded within the Public Lands Survey System section that encompasses the project site. The California Historical Resources Information System (CHRIS) records search results from the CCIC identified 14 cultural resources studies that have been previously conducted within 0.5-mile of the project site (Rincon 2023). Of these studies, one covered the northern portion of the project site, along Cathedral Oaks Road. Review of the CHRIS records search, the Santa Barbara County Built Environment Resource Directory, and the City of Goleta Historic Resources Inventory identified 11 cultural resources that have been previously recorded within 0.5-mile of the project site (Rincon 2023).

Rincon conducted a Phase 1 cultural resources pedestrian survey of the project site on May 23, 2023. Substantial evidence of past ground-disturbing activities in association with park development and landscaping was visible throughout the entire project site. Soils observed throughout the project site included dark brown to dark grayish brown and silty sand. Two shell fragments were observed on the ground surface during the Phase 1 pedestrian survey, resulting in completion of an Extended Phase I Study to determine the presence or absence of subsurface archaeological materials within the project site. A total of four shovel test pits were excavated. Native American monitoring during the Extended Phase 1 excavations was conducted by the Honorable Eleanor Fishburn of the Barbareño Band of Chumash Indians. No archaeological deposits were found through the course of the Extended Phase 1 testing (Rincon 2023).

Although no resources were found on-site as part of the Phase 1 and Extended Phase I Studies, based on the presence of Native American resources nearby, the project site is considered sensitive for archaeological resources (Rincon 2023). Construction of the proposed park amenities would therefore have the potential to uncover previously unidentified archaeological or tribal cultural resources, which could lead to damage or destruction of the resource. Impacts to archaeological and tribal cultural resources would therefore be potentially significant. With implementation of Mitigation Measures CR-1, CR-2, and CR-3, the City would require a Worker's Environmental Awareness Program training, retain an on-call archaeologist, require Native American monitoring, and follow adequate procedures in case of unanticipated discovery of archaeological or tribal cultural resources, including halting of work to evaluate the find. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

CR-1 Worker's Environmental Awareness Program

Prior to the start of ground disturbance, the construction crews shall participate in training led by an archaeologist under the direction of a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for prehistoric archaeology (NPS 1983) on the proper procedures to follow in the event that cultural resources are uncovered during the project excavations, site preparation, or other related activities. A Native American representative shall be provided the opportunity to participate and present in the WEAP training. This Worker Environmental Awareness Program shall include a comprehensive discussion of applicable laws and penalties under the law, samples or visuals of artifacts that might be found in the vicinity of the project site, a

discussion of what such artifacts may look like when partially buried or wholly buried and then freshly exposed, a discussion of what prehistoric and historic-period archaeological deposits look like at the surface and when exposed during construction, and instruction that employees are to halt work in the vicinity of a discovery (within 100 feet). This information shall be provided in an informational brochure that outlines reporting procedures in the event of a discovery. **Plan Requirements:** This condition shall be printed on all building/grading plans. **Monitoring:** The City shall check plans prior to issuance of a permit and City compliance monitoring staff shall spot check in the field throughout grading.

CR-2 Native American Monitoring

A City-qualified archaeologist and Native American observer shall monitor all excavation related activities throughout the project site to ensure that if prehistoric materials important to the Native American community are identified, they are assessed consistent with City of Goleta Cultural Resources Guidelines. In the unlikely event human remains are encountered during grading, excavation must be immediately suspended, and the protocol identified in CEQA Guidelines section 15065.4(e) and the State Public Resources Code section 5097.98 shall be followed. Any diagnostic prehistoric artifacts that are identified must be recovered and either curated at the Repository for Archaeological and Ethnographic Collections located at University of California, Santa Barbara or reburied at a location determined through consultation between the City of Goleta and tribal representatives.

Timing: This condition shall be printed on all building/grading plans. Before the City issues permits for any excavation related activities, verify contact information of the Native American consultant, and the agreed upon procedures to be followed. If remains are found and if the remains are found to be of Native American origin, the County Coroner shall notify the Native American Heritage Commission and the Commission shall name the Most Likely Descendant (MLD). The MLD, City-retained archaeologist, and City staff shall consult as to the disposition of the remains. If the remains are not identified of Native American origin, the County Coroner will take possession of the remains and comply with all state and local requirements in the treatment of the remains. **Monitoring:** The Department of Neighborhood Services Director, or designee, shall confirm that a Native American Monitor is retained, that the County Coroner is notified in the event human remains are found, and that the Native American Heritage Commission is contacted if the remains are of Native American Chumash origin.

CR-3 Unanticipated Discovery of Cultural Resources

In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any

significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. In compliance with City of Goleta Development Standards (17.43.040) set forth in Council Resolution No. 08-40, the City of Goleta shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the CHRIS, per CCR Guidelines Section 15126.4(b)(3)(C). **Plan Requirements:** This condition shall be printed on all building/grading plans. **Monitoring:** The City shall check plans prior to issuance of a grading permit and compliance monitoring staff shall spot check in the field if a resource is found.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

The discovery of human remains is always a possibility during ground disturbing activities. In compliance with City of Goleta Development Standards (17.43.040), if human remains are unexpectedly found, no further disturbance would occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the City of Goleta Planning and Environmental Review Department and County Coroner would be notified immediately. If the human remains are determined to be of Native American origin, the Coroner would notify the NAHC, which would determine and notify an MLD. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner would reinter the remains in an area of the property secure from subsequent disturbance. Adherence to existing regulations would reduce impacts to less than significant.

LESS THAN SIGNIFICANT IMPACT

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6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	□	□	■	□
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	□	□	■	□

Setting

As a state, California is one of the lowest per capita energy users in the United States, ranked 49th in the nation, due to its energy efficiency programs and mild climate (United States Energy Information Administration 2022). Electricity and natural gas are primarily consumed by the built environment for lighting, appliances, heating and cooling systems, fireplaces, and other uses such as industrial processes in addition to being consumed by alternative fuel vehicles. Petroleum fuels are primarily consumed by on-road and off-road equipment in addition to some industrial processes, with California being one of the top petroleum-producing states in the nation (CEC 2021). Gasoline, which is used by light-duty cars, pickup trucks, and sport utility vehicles, is the most used transportation fuel in California with 13.8 billion gallons sold in 2021 (CEC 2022a). Diesel, which is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles, is the second most used fuel in California with 1.8 billion gallons sold in 2021 (CEC 2022b).

In 2018, Senate Bill 100 accelerated the state's Renewable Portfolio Standards Program, codified in the Public Utilities Act, by requiring electricity providers to increase procurement from eligible renewable energy and zero-carbon resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. Electricity and natural gas service would be provided to the project by Southern California Edison. Table 9 summarizes the electricity and natural gas consumption for Santa Barbara County and for Southern California Edison, as compared to statewide consumption.

Table 9 2021 Electricity and Natural Gas Consumption

Energy Type	Santa Barbara County	Southern California Edison (SCE)	California	Proportion of SCE Consumption	Proportion of Statewide Consumption[1]
Electricity (GWh)	2,733	81,129	280,738	3.4%	1.0%
Natural Gas (millions of therms)	131	5,101	11,923	2.6%	1.1%

GWh = gigawatt-hours

[1] The population of Santa Barbara County (440,557 persons) is approximately 1.1 percent of the population of California (38,940,231 persons) (California Department of Finance 2023).

Source: CEC 2023a; 2023b

Table 10 summarizes the petroleum fuel consumption for Santa Barbara County, as compared to statewide consumption.

Table 10 2021 Annual Gasoline and Diesel Consumption

Fuel Type	Santa Barbara County (gallons)	California (gallons)	Proportion of Statewide Consumption1
Gasoline	168	13,818	1.2
Diesel	17	1,883	0.9

[1] The population of Santa Barbara County (440,557 persons) is approximately 1.1 percent of the population of California (38,940,231 persons) (California Department of Finance 2023).
Source: CEC 2023c

Energy consumption is directly related to environmental quality in that the consumption of nonrenewable energy resources releases criteria air pollutant and greenhouse gas (GHG) emissions into the atmosphere. The environmental impacts of air pollutant and GHG emissions associated with the project's energy consumption are discussed in detail in Environmental Checklist Section 3, *Air Quality*, and Environmental Checklist Section 8, *Greenhouse Gas Emissions*, respectively.

Impact Analysis

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The project would use nonrenewable and renewable resources for construction and operational activities. The anticipated use of these resources is detailed in the following subsections. CalEEMod outputs for the air pollutant and GHG emissions modeling (Appendix C) were used to estimate energy consumption associated with the project.

Construction Energy Demand

The project would require site preparation and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping. During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. As shown in Table 11, project construction would require approximately 119 gallons of gasoline and

approximately 8,185 gallons of diesel fuel. These construction energy estimates are conservative as they assume that the construction equipment utilized in each phase of construction is operating every day of construction.

Table 11 Estimated Fuel Consumption during Construction

	Fuel Consumption (gallons)	
Source	**Gasoline**	**Diesel**
Construction Equipment & Hauling Trips	N/A	8,185
Construction Worker Vehicle Trips	56	N/A

See Appendix C for energy calculation sheets.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, per applicable regulatory requirements such as 2022 CALGreen, the project would comply with construction waste management practices to divert a minimum of 65 percent of construction debris. These practices would result in the efficient use of energy necessary to construct the project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and construction impacts related to energy consumption would be less than significant.

Operational Energy Demand

As discussed in Environmental Checklist Section 3, *Air Quality*, the project would result in a nominal increase in vehicle trips upon completion of construction activities. Additionally, the proposed 375 sf restroom would be a new source of operational energy consumption.

Vehicle trips associated with future visitors and maintenance personnel represent the greatest operational use of energy associated with the project. Table 12 summarizes estimated operational annual energy consumption for the project[5]. As shown therein, project operation would result in the consumption of approximately 8,955 gallons of gasoline and 2,011 gallons of diesel for transportation fuels, 1,402 kWh of electricity, and zero U.S. therms of natural gas, on an annual basis.

[5] The operational energy consumption is based on a modeled a conservative maximum of 110 vehicle trips per day. As discussed in Environmental Checklist Section 17, *Transportation*, as the project would not change the use nor add substantial new facilities that would draw substantial additional recreators to use the park, the modeled operational energy use is presented as a worst case maximum.

Table 12 Estimated Project Annual Operational Energy Consumption

Source	Energy Consumption[1]	
Transportation Fuels		
Gasoline	8,955 gallons	983 MMBtu
Diesel	2,011 gallons	256 MMBtu
Electricity	1,402 kWh	5 MMBtu
Natural Gas Usage	0 U.S. therms	0 MMBtu

MMBtu = million metric British thermal units; kWh = kilowatt-hours
[1] Energy consumption is converted to MMBtu for each source
See Appendix C for energy calculation sheets and Appendix A for CalEEMod output results for electricity and natural gas usage.

The project would be required to comply with all standards set in the latest iteration of the California Building Standards Code (California Code of Regulations Title 24), which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation. CALGreen standards (California Code of Regulations Title 24, Part 11) require implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2022 Building Energy Efficiency Standards (California Code of Regulations Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to result in energy efficient performance so that buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, per CALGreen, all plumbing fixtures used for the project would be high-efficiency fixtures, which would minimize the potential the inefficient or wasteful consumption of energy related to water and wastewater.

Therefore, project operation would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The City of Goleta adopted the Strategic Energy Plan in July 2019, which is intended to assist the City of Goleta meet its 100 percent renewable electricity goals and address resiliency concerns by promoting renewable energy development (Goleta 2019). As detailed in Environmental Checklist Section 8, *Greenhouse Gas Emissions*, the Goleta General Plan (2006) Conservation Element contains goals and policies related to energy conservation, including Policy CE 13.4: *Energy Conservation for City Facilities and Operations*, which ensures compliance with Title 24 energy regulations and encourages project design that increases energy efficiency. As demonstrated in Environmental Checklist Section 8, *Greenhouse Gas Emissions*, the project would not conflict with the energy-related policies of the City's General Plan. The project would be required to comply with the nonresidential mandatory measures in 2022 CALGreen, which would reduce energy consumption compared to standard building practices. The project would also be required to comply with the energy standards in the California Building Energy Efficiency Standards. Measures included in the project to meet these energy standards include low-flow plumbing fixtures, water-efficient irrigation systems, and energy-efficient lighting. Compliance with these regulations would avoid potential conflicts with adopted

energy conservation plans. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and this impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	□	□	■	□
2. Strong seismic ground shaking?	□	□	■	□
3. Seismic-related ground failure, including liquefaction?	□	□	■	□
4. Landslides?	□	□	□	■
b. Result in substantial soil erosion or the loss of topsoil?	□	□	■	□
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	□	□	■	□
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	□	□	■	□
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	□	□	□	■
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	□	■	□	□

Impact Analysis

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The project site is not located in an Alquist-Priolo Earthquake Fault Zone. The closest Alquist-Priolo mapped earthquake fault to the project site is the Pitas Point—Red Mountain Fault South Strand Fault, located over 20 miles to the southeast (Department of Conservation 2022). The project site is located in a region of high seismic activity, with the potential for large seismic events that could generate strong ground shaking. Primary seismic risks at the project site would be earthquakes generated by local faults, as well as larger regional faults, such as the San Andreas Fault. Figure 5-1, *Geologic Hazards Map*, in the Goleta General Plan identifies these local faults. Faults within one mile of the project site include the Glen Annie Fault and Carneros Fault (City of Goleta 2006a).

The project would not include construction of buildings that would be permanently occupied by humans. Furthermore, the design and construction of the new restroom, upgrades to the Caretaker's House, trail features and other components would be constructed in conformance with California Building Code (CBC) Title 24, which identifies specific construction design requirements to reduce damage from strong seismic ground shaking. These CBC Title 24 requirements are adopted and incorporated into the Goleta Municipal Code and include recompaction measures to ensure structural stability during a seismic event. Compliance with applicable CBC requirements would reduce impacts related to rupture of a known earthquake fault and the risk of loss, injury, or death involving strong seismic ground shaking, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Liquefaction is the sudden loss of soil strength due to rapid increase in soil pore water pressures resulting from ground shaking during an earthquake. According to the City's General Plan, areas most vulnerable to liquefaction and seismic settlement are underlain by younger alluvium where groundwater and granular sediments are both present. These areas include low-lying lands adjacent to rivers, creeks, beaches, and estuaries (City of Goleta 2006a). The project site is not located in a low-lying area adjacent to a river, creek, beach, or estuary. The project would be designed and constructed in conformance with CBC Title 24, which identifies specific construction design requirements to reduce damage from liquefaction. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The project site exhibits a predominately level topography with minimal variation in elevation. There are no adjacent hillsides that pose landslide hazards, and as identified by Figure 5-1, *Geologic Hazards Map*, in the Goleta General Plan, the project site is not located in an area of moderate or high landslide potential (City of Goleta 2006a). Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. There would be no impact.

NO IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

Project construction and ground disturbing activities, including grading, have the potential to cause a loss of topsoil and soil erosion. During construction activities, short-term erosion impacts would be reduced by compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit, which would require the implementation of a stormwater pollution prevention plan (SWPPP) and the implementation of various best management practices (BMPs) to reduce erosion during construction activities. Compliance with the NPDES permit and implementation of BMPs during construction, such as straw wattles and silt fencing, would reduce impacts resulting from loss of topsoil. In addition, the project would be required to prepare an Erosion and Sediment Control Plan prior to the issuance of a grading permit in the City, pursuant to Section 15.09.290 of the Goleta Municipal Code. Compliance with these regulations would reduce impacts to soil erosion and a loss of topsoil to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Unstable soils may experience liquefaction, subsidence, lateral spreading, settlement, or landslides during seismic events. Liquefaction specifically refers to the loss of soil strength during seismic activity, subsidence refers to the downward sinking of the ground surface, lateral spreading involves horizontal movement of soil or rock layers, and settlement encompasses the vertical movement or subsidence of the ground. As discussed under Checklist Item a.3., the project would not exacerbate or increase exposure to liquefaction hazards. As discussed under Checklist Item a.4., the project would not result in exposure to landslide hazards. Project components would be designed and constructed in conformance with CBC Title 24, which identifies specific construction design requirements to reduce damage from potential lateral spreading, subsidence, and collapse. Pursuant to compliance with applicable CBC requirements, the project would not result in on- or of-site landslide, lateral spreading, subsidence, liquefaction, or collapse. This impact would be less than significant impact.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils have a high shrink/swell potential. Clay minerals in these soils expand when moisture content increases and shrink when moisture content decreases. According to the City's General Plan, soils deriving from the Rincon and Monterey Formations are associated with high shrink/swell potentials (City of Goleta 2006a). Soils underlying the project site include Milpitas-Positas fine sandy loams with 2 to 9 percent slopes (MeC); Goleta loam with 0 to 2 percent slopes (GdA); and Camarillo fine sandy loam, fine substratum (Cb) (United States Department of Agriculture Natural Resources Conservation Service 2023). On-site soils do not belong to the Rincon and Monterey Formations. As such, the project would not be located on expansive soil. Additionally, project components would be designed and constructed in conformance with CBC Title 24, which identifies specific construction design requirements to reduce damage from expansive soils. The project would not create substantial direct or indirect risks to life or property due to expansive soils and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The new restroom would connect to the existing sewer system. The use of septic tanks or other alternative wastewater disposal systems would not be required. Therefore, the project would have no impact from proposed septic tanks or wastewater.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Most of the project site has been previously disturbed and does not contain unique geologic formations. The project site is in an urbanized, residential area of the City, where it is unlikely that unique paleontological resources exist in surficial soils on the project site. Although project implementation is not expected to uncover paleontological resources, the possibility to encounter sub surface paleontological resources exists during ground disturbing related activities. Construction of the proposed park amenities would have the potential to uncover previously undiscovered paleontological resources, which could lead to damage or destruction of the resource. Impacts to paleontological resources would therefore be potentially significant. Mitigation Measure GEO-1 requires implementation of specific procedures should unanticipated resources be found, including halting of work and retainment of a qualified professional paleontologist to monitor and evaluate the find. With implementation of Mitigation Measure GEO-1, impacts to paleontological resources would be less than significant.

Mitigation Measure

GEO-1 Unanticipated Discovery of Paleontological Resources

In the event an unanticipated fossil discovery is made during the course of project development, construction activity shall be halted in the immediate vicinity of the fossil, and a qualified professional paleontologist shall be notified and retained to evaluate the discovery, determine its significance, and

determine if additional mitigation or treatment is warranted. Work near the discovery may resume once the find is properly documented and the qualified professional paleontologist authorizes resumption of construction work. Any significant paleontological resources found during construction monitoring shall be prepared, identified, analyzed, and permanently curated in an approved regional museum repository under the oversight of the qualified paleontologist. **Plan Requirements & Timing:** If paleontological resources are encountered during construction, identify and retain a qualified paleontologist prior to additional ground disturbing activity in the vicinity of the find. This condition shall be printed on all building/grading plans. **Monitoring:** The Department of Neighborhood Services Director, or designee, must verify compliance before grading/construction in the vicinity of a find may be resumed.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	□	□	■	□
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	□	□	■	□

Overview of Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of GHG emissions contributing to the "greenhouse effect," a natural occurrence which takes place in Earth's atmosphere and helps regulate the temperature of the planet. Most radiation from the sun hits Earth's surface and warms it. The surface, in turn, radiates heat back towards the atmosphere in the form of infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping into space and re-radiate it in all directions.

GHG emissions occur both naturally and from human activities, such as fossil fuel burning, decomposition of landfill wastes, raising livestock, deforestation, and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of a specific GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).

The United Nations IPCC expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatons of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature. Potential climate

change impacts in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (California Natural Resource Agency 2019).

Significance Thresholds

Most individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA guidelines*, Section 15064[h][1]).

According to the *State CEQA Guidelines*, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the proposed project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (2016) in its white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions.

The City of Goleta has not adopted quantitative GHG emissions thresholds for land use development projects. The City adopted a Climate Action Plan (CAP) in 2014 which identified measures enabling the City to meet the GHG reduction target for 2020 consistent with AB 32. However, the CAP does not establish a pathway to achieving the State's goal for 2030. Therefore, the CAP does not qualify as a GHG reduction plan for projects with horizon years beyond 2020. On January 26, 2021, Santa Barbara County adopted new Interim GHG Emissions Thresholds of Significance (referred to herein as "Interim GHG Thresholds"), which are recommended for use until completion of the County's 2030 Climate Action Plan.[6] The Interim GHG Thresholds recommend that land use projects be first assessed against a screening criterion of 300 MT CO_2e. For projects that exceed the screening threshold, a service population threshold of 3.8 MT CO_2e is recommended.

The City of Goleta is in Santa Barbara County, and thresholds deemed applicable in Santa Barbara County would also reasonably apply to projects within the City of Goleta. The City has consistently relied on these standards as the methodology for establishing a threshold for analyzing the potential greenhouse gas impacts of a project. Therefore, this analysis uses the County's recommended screening criterion of 300 MT CO_2e with a service population threshold of 3.8 MT CO_2e for projects that exceed the screening criterion to assess the potential significance of project GHG emissions. In addition, the project is evaluated based on consistency with the 2022 Scoping Plan, City of Goleta General Plan/Coastal Land Use Plan, and City of Goleta CAP for the purposes of reducing GHG emissions and mitigating the effects of climate change.

Methodology

GHG emissions associated with project construction and operation were estimated using CalEEMod, version 2022.1, with the assumptions described under Environmental Checklist Section 3, *Air Quality*. Construction emissions occur for a limited period of a project's lifetime; as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime. The project is assumed

[6] The 2030 Climate Action Plan is planned for adoption in 2023.

to have a 25-year lifespan. Therefore, GHG emissions from construction are amortized over a period of 25 years and combined with annual operational GHG emissions.

Impact Analysis

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

The project would generate GHG emissions from construction and operation. As discussed in Environmental Checklist Section 17, *Transportation,* the project would result in a net increase in vehicle trips and would therefore result in operational mobile source emissions.

Construction activities facilitated by the project would generate temporary GHG emissions primarily from the operation of construction equipment onsite, as well as from vehicles transporting construction workers to and from the project site, and heavy trucks to transport materials. As shown in Table 13, construction associated with the project would generate 74 metric tons (MT) of CO_2e. Amortized over a 25-year period, construction associated with the project would generate 3 MT of CO_2e per year.

Table 13 Construction GHG Emissions

Year	Emissions (MT of CO_2e)
2024	74
Total	**74**
Amortized over 50 years	**3**

MT = metric tons; CO_2e = carbon dioxide equivalents

Source: Table 2.2 "Construction Emissions by Year, Unmitigated" emissions. Annual emissions results are shown for all emissions. See CalEEMod worksheets in Appendix AQ.

Project operation would generate GHG emissions primarily from mobile sources, energy sources (i.e., water heating and electricity consumption), water conveyance, and area sources (i.e., landscaping equipment). As shown in Table 14, project operation would generate approximately 78 MT of CO_2e per year. Combined with amortized construction emissions, the project would generate a total of 81 MT of CO_2e per year. Mobile sources would represent the vast majority of project emissions. Overall project emissions would not exceed the County of Santa Barbara's recommended screening criterion of 300 MT CO_2e. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.

Table 14 Combined Annual GHG Emissions

Emission Source	Annual Emissions (MT of CO_2e per year)
Construction	3
Operational	
Area	<1
Energy	<1
Mobile	78
Solid Waste	<1
Water	<1
Total Emissions	**814**
Screening Threshold	**300**
Exceeds Threshold?	**No**

MT = metric tons; CO_2e = carbon dioxide equivalents

Source: Table 2.2 "Construction Emissions by Year, Unmitigated" emissions. Annual emissions results are shown for all emissions. See CalEEMod worksheets in Appendix A.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Plans and policies have been adopted to reduce GHG emissions in the City of Goleta and Santa Barbara County, including the City of Goleta CAP, City of Goleta General Plan/Coastal Land Use Plan, and the State's 2022 Scoping Plan. The City of Goleta CAP and General Plan/Coastal Land Use Plan both contain policies aimed at reducing GHG emissions from municipal operations through upgrades, water conservation strategies, and improved building standards (City of Goleta 2006; 2014). The project would be consistent with these policies by providing general improvements to an existing public park and constructing a new restroom that meets water use and energy efficiency requirements. The project would also be consistent with General Plan/Coastal Land Use Plan policies OS 6.10 (Design and Management of Public Parks and Open Space) and OS 7.9 (Open Space or Greenbelt around Goleta), which support preservation of open green spaces and expansion of pedestrian trail networks. Therefore, the project would be consistent with the City of Goleta CAP and General Plan/Coastal Land Use Plan.

The new restroom would comply with 2022 CALGreen standards for plumbing and wastewater conveyance. In addition, the project would comply with the latest Title 24 building standards by installing energy-efficient light fixtures. Therefore, the project would be consistent with the Draft County of Santa Barbara 2030 CAP.

This analysis also evaluates the project against the goals of the 2022 Scoping Plan (CARB 2022). One of the goals of the 2022 Scoping Plan is to support climate adaptation and biodiversity that includes protection of the state's water supply, natural and working lands, and infrastructure to achieve carbon neutrality as soon as possible (CARB 2022). The proposed improvements would ensure continued preservation of the existing open space without introducing a significant source of GHG emissions. Therefore, the project would maintain natural lands. Although the project would generate

temporary construction emissions, the project would be consistent with the goals of CARB's 2022 Scoping Plan.

The project would not conflict with any applicable plans, policies, or regulations to reduce GHG emissions and impacts related to GHG emissions would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	□	□	■	□
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	□	□	■	□
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	□	□	■	□
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	□	□	□	■
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	□	□	□	■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	□	□	■	□
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	□	□	■	□

Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction and operation/maintenance activities of the park improvements would not involve the use or transport of hazardous materials beyond those used in operation of typical construction equipment or typical landscaping materials. Materials used for construction would be transported to and within the project site for regular construction activities, and may include: diesel fuel, lubricants, adhesives, cleaning solutions, and chemical toilets. Hazardous materials used during project operation would include pesticides for landscaping purposes, and such use would not increase compared to existing operational conditions.

Hazardous materials use and transport during both construction and operation of the project would be required to comply with pertinent federal, State, and City regulations regarding their storage, on-site use, and off-site disposal such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. These regulations would ensure safe transport of hazardous materials on roads to the project site, as well as safe disposal of hazardous materials used for the project. Compliance with applicable regulations would ensure the project has a less than significant impact.

LESS THAN SIGNIFICANT IMPACT

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

The nearest school to the project site is La Patera Elementary School, located approximately 70 feet to the west across North La Patera Lane. Although greater than 0.25 mile, three other schools are located near the project site: Goleta Valley Junior High School and Santa Barbara Charter School (approximately 0.45 mile to the east), and Montessori Center School of Santa Barbara (approximately 0.65 mile to the east). The project includes park improvements which would not involve the use of large quantities of hazardous materials. In addition, as discussed in Environmental Checklist Items a and b, although small quantities of potentially hazardous materials such as fuels, lubricants, solvents, and oils could be used during construction and operation of the project, the transport, use, and storage of any and all hazardous materials would be conducted in accordance with all applicable State and federal laws, as discussed in Environmental Checklist Items a and b. The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Government Code Section 65962.5 requires the California Environmental Protection Agency to develop an updated Hazardous Waste and Substances Sites List, also known as the Cortese List. The California Department of Toxic Substances Control (DTSC) is responsible for a portion of the information contained in the Cortese List; other state and local government agencies are also required to provide additional hazardous material release information for the Cortese List. The analysis for this section included a review of the following resources on June 28, 2023, to provide hazardous material release information:

- State Water Resources Control Board (SWRCB) GeoTracker database (SWRCB 2023)
- DTSC EnviroStor database (DTSC 2023)

The project site is an existing park and has an existing land use and zoning designation of Open Space Active Recreation (OSAR). Based upon review of the SWRCB and DTSC databases, there are no active hazardous material sites mapped within the project site. As such, the project would not create a significant hazard to the public or the environment due to listed cleanup sites. Therefore, the project would have no impact regarding hazardous materials sites compiled pursuant to Government Code Section 65962.5.

NO IMPACT

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The project does not include habitable structures. The project site is located approximately one mile north of the Santa Barbara Municipal Airport and is outside of the airport's safety zones and noise exposure contours (SBCAG 2023). The project does not involve the construction of any structures or features that would subject users of the project site to substantial aircraft safety risks. The project would have no impact involving aircraft safety hazards or excessive aviation-related noise.

NO IMPACT

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City of Goleta, in cooperation with the Federal Emergency Management Agency (FEMA), the County of Santa Barbara, and State Offices of Emergency Services, is responsible for emergency preparedness and response. Components of emergency preparedness and response include identification of evacuation routes and secondary emergency accesses, as well as provision of information to the community regarding appropriate individual actions in the event of various types of emergencies. The City of Goleta maintains an Emergency Operations Plan that provides directions to staff on the first steps that need to be taken in an emergency, and lays out the general response structure to the event. The Plan does not identify specific emergency response/evacuation routes (City of Goleta 2021).

Project construction would not impair implementation of an adopted emergency response plan or emergency evacuation plan, as construction staging and construction worker parking would occur on-site and would not impede existing roadway traffic. The project would not result in the construction

of new facilities or establishment of new uses that could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan during project operation. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project site is located approximately 80 feet south of a High Fire Hazard Severity Zone and one mile southeast of a Very High Fire Hazard Severity Zone (California Department of Forestry and Fire Protection [CAL FIRE] 2023). The project site itself is not located within a Fire Hazard Severity Zone in a State Responsibility Area and is within the incorporated area of local responsibility (City of Goleta 2006a). The project site is located within an urbanized area of the City of Goleta and is surrounded by existing residential development. Project components include the expansion and development of recreational amenities, and the project would not construct housing or other habitable structures. The project would not expose people or structures to a significant risk involving wildland fires or worsen the risk of wildfire and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	□	□	■	□
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	□	□	■	□
c. 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:				
(i) Result in substantial erosion or siltation on- or off-site;	□	□	■	□
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	□	□	■	□
(iii) 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	□	□	■	□
(iv) Impede or redirect flood flows?	□	□	■	□
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	□	□	□	■
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	□	□	■	□

Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction Impacts

Overall construction for the project would result in disturbance of up to approximately 2,000 cubic yards of soil and would require the minor use of heavy machinery. Grading and other construction activities would have the potential to impact soil erosion and increase sediment loads in stormwater runoff resulting from exposed or disturbed soil. Additionally, spills, leakage, or improper handling and storage of substances such as oils, fuels, chemicals, metals, and other substances used during various construction phases could be collected in stormwater runoff and impact water quality.

The City of Goleta's Stormwater Management Program protects water quality in accordance with the Regional Water Quality Control Board (RWQCB) pursuant to NPDES requirements (City of Goleta 2020a). On-site construction activities would be subject to the NPDES Statewide General Construction Activity Stormwater permit, which would require visual monitoring of stormwater and non-stormwater discharges, sampling, analysis, and monitoring of non-visible pollutants; and compliance with applicable water quality standards established for receiving waters potentially affected by construction discharges. Additionally, construction site operators would be responsible for preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP) which would outline project-specific BMPs (e.g., straw waddles and silt fencing) to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants in stormwater.

Implementation of construction BMPs would minimize surficial erosion and transport of pollutants and provide compliance with applicable NPDES requirements. In addition to the permit and SWPPP requirements, the project would be required to comply with the City of Goleta Municipal Code Section 15.09.290, which requires preparation of an Erosion and Sediment Control Plan. The Plan would contain requirements of the City's BMPs for erosion and sediment control, which would prevent erosion and siltation in surface water runoff and in the storm drain system during site grading and soil disturbance activities. Compliance with existing regulations and implementation of construction BMPs would ensure that the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Construction related impacts would be less than significant.

Operational Impacts

Project operation could impact water quality from stormwater generated by new impervious parking lots, sidewalks, and paved areas on the project site, which could contain pollutants from automotive chemicals, trash, landscaping, and sediment. The project would include the introduction of new bioswales, located by the caretaker's cottage and by the entry promenade, for stormwater collection, which would reduce average concentrations of a broad range of contaminants from entering the City's stormwater system.

The project would be subject to the Central Coast RWQCB's Post Construction Requirements, which apply to all development projects resulting in 2,500 square feet or more of net impervious surface area. In compliance with the Central Coast Post Construction Requirements, the City would need to submit a complete Stormwater Control Plan for the project to the RWQCB, which would demonstrate adequate stormwater management features and facilities to treat and capture stormwater on-site. In addition, the Stormwater Control Plan would include an operation and maintenance plan which would

identify the individuals responsible for maintenance of the stormwater control facilities. The Stormwater Control Plan would be reviewed and approved by the City of Goleta Engineering Division. Pursuant to compliance with applicable regulations and measures, the project would not violate water quality standards or waste discharge requirements. Operational impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Water for the project would be provided by the Goleta Water District (GWD), which relies on four sources of water to meet its existing and future demands: (1) surface water via the Cachuma Project; (2) surface water from the State Water Project (SWP); (3) groundwater from the Goleta Groundwater Basin; and (4) recycled water (GWD 2021). The GWD operates under the Wright Judgment which prohibits overdrafting of the Goleta Groundwater Basin (GGWB) and mandates the maintenance of the basin in a hydrologically balanced condition (*Wright v. Goleta Water Dist. (1985) 174 Cal. App. 3d 74.*). The GGWB is designated as a very low-priority basin (Department of Water Resources 2023), and a Groundwater Sustainability Plan has not been prepared.

The project would not involve on-site groundwater extraction that would result in substantial drawdown of an underlying aquifer. However, the proposed new bathroom facility would generate new water demand. The caretaker's cottage would also use water, but the project would not increase the amount of water compared to existing conditions. The potential increase in operational water use from the new bathroom facility would be minimal. As such, no substantial decrease in groundwater supplies would occur. Anticipated runoff from the addition of approximately 9,500 square feet of new impervious surfaces would flow into the surrounding landscaped areas and proposed bioswales, facilitating groundwater recharge.

As discussed in Environmental Checklist Item a, the project would not violate water quality standards or degrade water quality during construction or operation. There is no applicable sustainable groundwater management plan for the GGWB. Therefore, the project would not substantially decrease groundwater supplies or interfere with groundwater recharge and would not conflict with a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c.(i) Would the project 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 result in substantial erosion or siltation on- or off-site?

c.(ii) Would the project 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 off-site?

c.(iii) Would the project 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 that would 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?

c.(iv) Would the project 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 impede or redirect flood flows?

The project site is not located in a flood zone, as discussed under Environmental Checklist Item d, and does not contain a river or stream which would be altered and result in flooding on- or off-site. Construction or modification of project components, such as the parking lot, maintenance facility, fitness trail loop, and native tree grove trail, would alter the existing drainage pattern of the site through the addition of paved areas. However, compliance with NPDES requirements, implementation of SWPPP BMPs, and the project-specific Erosion and Sediment Control Plan would prevent erosion or siltation on or off the project site. Furthermore, the project would implement a Stormwater Control Plan that would demonstrate adequate stormwater management features and facilities to treat and capture stormwater on-site. Therefore, the project would not substantially alter the existing drainage patterns of the site or area in a manner that would result in substantial erosion or siltation, in runoff that leads to flooding, in runoff that exceeds stormwater drainage capacity, or in a manner that would impede or redirect flood flows. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

According to the FEMA National Flood Hazard Layer Viewer, the project site is not located in a flood zone (FEMA 2012). According to Figure 5-2 of the City's General Plan/Coastal Land Use Plan, the project site is not located in a Tsunami Inundation Zone (City of Goleta 2016). In addition, the project site is not located near a large body of water with seiche hazards. Therefore, there would be no risk of release of pollutants due to inundation associated with a flood hazard, tsunami, or seiche, and the project would have no impact.

NO IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	□	□	□	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	□	□	■	□

Impact Analysis

a. Would the project physically divide an established community?

The project would not divide an established community. The project site is an existing park located within a residential neighborhood. The project would not expand the existing park such that it would lead to the division of the neighborhood. Rather, the project would include connectivity improvements, such as a walking/running path that would connect the northern and southern ends of Stow Grove Park, that would facilitate access to the new and expanded recreational amenities. There would be no impact involving the physical division of an established community.

NO IMPACT

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The project would not require a General Plan amendment or Specific Plan amendment and would not conflict with a land use plan adopted for the purpose of avoiding or mitigating an environmental effect. As a park-specific master plan, the project is designed to be consistent with the City's General Plan Open Space Element. The project site has a land use designation of Open Space Active Recreation (OSAR), and project components—which include general park improvements as well as recreational, social, educational, and nature-based amenities—would be consistent with permitted land uses under this designation. Therefore, the project would not cause a significant environmental impact due to conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	□	□	□	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	□	□	□	■

Impact Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The City of Goleta General Plan/Coastal Land Use Plan EIR indicates that there are no existing or planned surface mining operations within the City (City of Goleta 2006b). The Ellwood Oil Field is the only extractive industry with the City of Goleta, located approximately 2.6 miles southwest of the project site in the Ellwood Mesa. The project would not result in the loss of availability of known or locally important mineral resources and there would be no impact.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	□	□	■	□
b. Generation of excessive groundborne vibration or groundborne noise levels?	□	□	■	□
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	□	□	□	■

Overview of Sound Measurement

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz and less sensitive to frequencies around and below 100 Hertz (Kinsler, et. al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible

(8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud [(10.5x the sound energy) Crocker 2007].

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of sources (e.g., point or line, the path the sound will travel, site conditions, and obstructions). Noise levels from a point source typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance (e.g., construction, industrial machinery, ventilation units). Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) result simply from the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site (e.g., soft dirt, grass, or scattered bushes and trees) (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features such as hills and dense woods, and man-made features such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). Structures can substantially reduce exposure to noise as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level (L_{eq}); it considers both duration and sound power level. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. Typically, L_{eq} is summed over a one-hour period. L_{max} is the highest root mean squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007).

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours. It is also measured using CNEL, which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by L_{dn} and CNEL usually differ by about 1 dBA. The relationship between the peak-hour L_{eq} value and the L_{dn}/CNEL depends on the distribution of traffic during the day, evening, and night. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60-plus CNEL range. Normal conversational levels are in the 60 to 65-dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (FHWA 2018).

Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body starts from a low frequency of less than 1 Hz and goes to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (Federal Transit Administration [FTA] 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern related to vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is impacted by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean squared (RMS) vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Sensitive Noise Receivers

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. According to the City of Goleta Noise Element, the following land uses are considered noise-sensitive: residential neighborhoods, schools, libraries, hospitals and rest homes, auditoriums, certain open space areas, and public assembly places (City of Goleta 2006).

Vibration-sensitive receivers, which are similar to noise-sensitive receivers, include residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas. Vibration-sensitive receivers also include buildings where vibrations may interfere with vibration-sensitive equipment that is affected by vibration levels that may be well below those associated with human annoyance (e.g., recording studios or medical facilities with sensitive equipment).

The nearest sensitive receivers to project construction include the single-family residences along Windsor Avenue adjacent to the eastern project site boundary, single-family residences across North

La Patera Lane approximately 70 feet west of the project site, and La Patera Elementary School located approximately 70 feet west of the project site.

Noise Sources and Regulation

The primary existing noise source in the vicinity of the project site is vehicular traffic on Cathedral Oaks Road. Secondary noise sources include vehicular traffic on North La Patera Lane and other local neighborhood roadways.

City of Goleta Noise Element Policy NE 6.4 restricts construction activities near or adjacent to residential buildings and other sensitive receptors to the hours of 8:00 AM to 5:00 PM Monday through Friday and 7:00 AM to 4:00 PM Monday through Friday for construction in nonresidential areas. Noise Element Policy NE 6.5 requires the following measures to be incorporated into grading and building plan specifications to reduce construction noise:

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

Goleta Municipal Code Chapter 9.09 regulates noise in the City. The purpose of the chapter is to preserve public peace and comfort for citizens of Goleta from unwarranted noise and disturbances. The Goleta Municipal Code prohibits loud and unreasonable noise from 10:00 PM to 7:00 AM Sunday through Thursday and 12:00 AM to 7:00 AM Friday and Saturday. Loud and unreasonable noise is defined as sound which is clearly discernible at a distance of 100 feet from the property line of the property upon which it is broadcast or sound which is above 60 dBA at the edge of the property line upon which the sounds is broadcast. The City does not have any code requirements related to noise from construction activities.

For traffic-related noise, impacts would be considered significant if project-generated traffic would result in exposure of sensitive receptors to an unacceptable increase in noise levels. For purposes of this analysis, a significant impact would occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 3 dBA or more.

Impact Analysis

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Noise

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise sensitive receivers near the project site. RCNM provides reference noise levels for standard construction equipment, with an attenuation rate of 6 dBA per doubling of distance for stationary equipment.

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the L_{eq} of the operation (FHWA 2018). Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some having higher continuous noise levels than others, and some having high-impact noise levels.

Construction activity would result in temporary noise in the project site vicinity, exposing surrounding nearby receivers to increased noise levels. It is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location. In addition, construction equipment would not be in constant use during the 8-hour operating day. Project construction would involve relatively light construction activities (e.g., minor site preparation, grading, and building construction). Therefore, for this analysis it was conservatively assumed the two loudest pieces of equipment, a crane and a backhoe, would operate simultaneously.

The nearest sensitive receivers to the project site are single-family residences directly adjacent to the east and those to the west across North La Patera Lane. Over the course of a typical construction day, construction equipment would be located as close as 50 feet to the properties but would typically be located at an average distance farther away due to the nature of construction and the lot size of the project. For example, during a typical construction day, the equipment may operate across the horizontal distance of the site (50 to 350 feet) from a nearby noise receiver. Therefore, it is assumed that over the course of a typical construction day the construction equipment would operate at an average distance of 200 feet from the single-family residences.

At a distance of 200 feet, a crane and a backhoe are estimated at a noise level of 64.1 dBA L_{eq} at the exterior of nearby residential sensitive receptors, which would not exceed the threshold of 65 dBA (calculations are included in Appendix D). At distances greater than 200 feet, noise levels would be lower due to the attenuation of sound at increased distances. Therefore, the La Patera Elementary School would not be exposed to noise levels exceeding the City threshold of 65 dBA. Construction activities would also be required to comply with Policy NE 6.4 and NE 6.5 of the Goleta General Plan, which limit noise-generating construction activities to the hours of 8:00 a.m. and 5:00 p.m. on weekdays and require implementation of noise reducing measures during construction (i.e., shutting off idling equipment, installation of acoustic barriers, and implementing sound-control devices on heavy machinery). These measures are required by the City on a case-by-case basis and would further reduce noise levels below the noise level determined above. Therefore, the project would not result

in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impacts would be less than significant.

Operation

As discussed in Environmental Checklist Section 17, *Transportation*, the project would generate fewer than 110 daily vehicle trips per day, which would be a new source of operational noise. Generally, a doubling of traffic (i.e., a doubling of the sound energy) would result in a 3 dBA increase. A potential maximum increase of 110 daily trips would be much lower than a doubling of traffic[7]; therefore, project-related traffic would not result in a 3 dBA increase in noise levels. Additional park improvements would improve existing facilities and would not constitute new sources of operational noise. As such, project operation would not generate a substantial temporary increase in ambient noise levels in the vicinity of the project, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

The project does not include any substantial vibration sources associated with operation. Thus, construction activities have the greatest potential to generate ground-borne vibration affecting nearby receivers, especially during grading and excavation of the project site. The greatest vibratory source during construction in the project vicinity would be a large bulldozer. Neither blasting nor pile driving would be required for construction of the project. Construction vibration estimates are based on vibration levels reported by FTA (FTA 2018). Table 15 shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration (FTA 2018).

Table 15 Vibration Levels Measured during Construction Activities

Equipment	PPV at 25 ft. (in/sec)
Large Bulldozer	0.089
Loaded Trucks	0.076
Small Bulldozer	0.003

Source: FTA 2018

Maximum recommended vibration limits by the American Association of State Highway and Transportation Officials (AASHTO) are identified in Table 16. Based on AASHTO recommendations, limiting vibration levels to below 0.2 In/sec PPV at residential structures would prevent structural damage regardless of building construction type. These limits are applicable regardless of the frequency of the source.

[7] According to the City of Goleta General Plan Figure 7-1 *Existing and Projected Future Traffic Volumes and Intersection LOS*, 2005 PM peak hour vehicle trips averaged 922 vehicle trips.

Table 16 AASHTO Maximum Vibration Levels for Preventing Damage

Type of Situation	Limiting Velocity (in/sec)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5

Source: Caltrans 2020

A dozer creates approximately 0.089 in/sec PPV at a distance of 25 feet. A dozer may be used within 100 feet of the nearest off-site structure; at this distance, vibration levels would be 0.019 in/sec PPV. This would be lower than the structural damage impact of 0.20 in/sec PPV. Therefore, the project would not result in generation of excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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

Santa Barbara Airport is the nearest public airport, located approximately 1.3 miles to the south of the project site. According to the noise compatibility contours figure for Santa Barbara Airport in the Santa Barbara County Airport Land Use Compatibility Plan (Santa Barbara County Airport Land Use Commission 2023), the project site is located outside the airport's 60-65 CNEL noise contour. The project would not expose construction workers or park users to excessive noise levels from the airport. No impact would occur.

NO IMPACT

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14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	□	□	□	■
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	□	□	□	■

Impact Analysis

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project includes improvements to an existing park intended to serve existing Goleta residents. The project does not include new residences that would directly induce population growth, nor would it facilitate indirect growth. As such, the project would not induce a substantial unplanned population growth in the area either directly or indirectly. The project includes improvements to the caretaker cottage and the project site does not contain existing residences that could be displaced because of the project. As such, it would not displace substantial numbers of existing people or housing. There would be no impact.

NO IMPACT

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15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1 Fire protection?	□	□	■	□
2 Police protection?	□	□	■	□
3 Schools?	□	□	□	■
4 Parks?	□	□	□	■
5 Other public facilities?	□	□	□	■

Impact Analysis

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Fire protection services would continue to be provided by the Santa Barbara County Fire Department, and police protection services would continue to be provided by the Santa Barbara County Sheriff's Office under contract to the City. The nearest fire station to the project site is Santa Barbara County Fire Station 14, located at 320 North Los Carneros Road, 0.5 mile west from the project site, adjacent to Los Carneros Park. The nearest police station is approximately four miles east from the project site, located at 4434 Calle Real in the unincorporated County of Santa Barbara. The project site is located in an urbanized residential area of Goleta. The site is an existing park that is currently served by fire and police protective services. The project entails minor park improvements that would not introduce new uses at the site that would demand increased fire or police protection services such that new or

expanded police or fire protective facilities would be required. Impacts involving fire and police protection services would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

As discussed in Environmental Checklist Section 14, *Population and Housing*, the project would not include the construction of housing and would not generate population growth. Since the project would not introduce new students to the local school districts, the project would not require new or altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. There would be no impact.

NO IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

The project involves the expansion and development of recreational facilities and amenities. As discussed in Environmental Checklist Section 14, *Population and Housing*, the project would not induce population, and consequently would not increase demand for existing parks/recreational facilities. Since the project would not require other new or physically altered parks, there would be no impact.

NO IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

As discussed in Environmental Checklist Section 14, *Population and Housing*, the project would not include the construction of housing and would not generate population growth. Implementation of the project would not introduce new residents to the area, thereby resulting in an increased need for new or altered public facilities, such as libraries. The project would not result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts. There would be no impact.

NO IMPACT

16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	□	□	□	■
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	□	■	□	□

Impact Analysis

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The project includes improvements to an existing park, which would not increase the use of this or other existing parks or recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated. In fact, the project would replace already deteriorated facilities at Stow Grove Park and include improvements that would extend the lifetime of the existing park. In addition, as discussed in Environmental Checklist Section 14, *Population and Housing*, the project would not induce population, thereby increasing demand for existing recreational facilities. The environmental impacts associated with construction activities necessary to implement the Master Plan are analyzed in this IS-MND in Environmental Checklist Sections 1-20. There would be no impact.

NO IMPACT

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The project includes improvements to an existing park. The improvement/construction of recreational facilities could have potential environmental impacts and are the basis for this Initial Study. As discussed in Environmental Checklist Section 4, *Biological Resources*, mitigation measures are required to reduce potential impacts to special status species and ESHA. Environmental Checklist Section 5, *Cultural Resources*, and Section 7, *Geology and Soils*, note that impacts to archaeological and paleontological resources would be potentially significant. Mitigation measures in these respective sections would reduce potential environmental impacts to a less-than-significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	□	□	■	□
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	□	□	■	□
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	□	□	□	■
d. Result in inadequate emergency access?	□	□	■	□

Impact Analysis

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Construction

Traffic impacts during project construction would be primarily associated with worker vehicles and construction equipment and material deliveries. During project construction, it is expected that vehicles would continue to utilize the surrounding street system and existing parking lot within Stow Grove Park. The increased number of vehicles on adjacent roadways would be minimal during the temporary construction period and would cease once construction is complete. Project construction would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

Operation

The project would include restriping the existing parking lot in accordance with ADA regulations and would introduce a second drive aisle to improve circulation. As discussed in Environmental Checklist Item b, project operation would add fewer than 110 vehicle trips to the circulation network and existing park users would continue to utilize the parking lot on-site when accessing by vehicle. Although some residents/visitors would continue to access Stow Grove Park by vehicle, most users would be pedestrian and bicycle users from the immediate area and surrounding neighborhoods. Worker vehicle trips and supply deliveries may occur during project operation when maintenance of the park is needed or for landscaping purposes; however, it is anticipated that these numbers would

be minimal, similar to existing conditions, and not affect the local circulation network. Project operation would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The project would result in the development of recreational and open space amenities with active transportation facilities, including walking trails, walking/running paths, a fitness/trail loop, bird watching trails, and native tree grove trail. These amenities would provide recreational options for pedestrians and bicyclists within an existing suburban area. Pursuant to the Resolution No. 20-44 adopting the City's Vehicle Miles Traveled (VMT) related thresholds and screening criteria for small projects, a project is presumed to have a less than significant VMT impact if the project generates 110 or fewer average daily trips (City of Goleta 2020b). The project site is an existing public park, and the proposed project includes upgrades to the existing facilities. The project would not change the use nor add substantial new facilities that would draw substantial additional recreators to use the park. As such, the project would not generate more than 110 vehicle trips per day and would thus be under the City's screening criteria for impacts to VMT. The project would have a less than significant impact involving VMT and would thus be consistent with CEQA Guidelines section 15064.3, subdivision (b).

LESS THAN SIGNIFICANT IMPACT

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

During construction, equipment staging would occur on-site, and construction personnel would park on-site, minimizing the potential for construction to increase hazards from construction equipment. The project would not involve changes to existing roadways and the new secondary access point for maintenance/emergency vehicles would comply with Chapter 17.38 of the Goleta Municipal Code, which outlines requirements for ingress/egress. Project operation would not introduce new incompatible uses, as the site is an existing park and proposed improvements would not change this use. Since the project does not include features which would increase hazards due to design or incompatible uses, there would be no impact.

NO IMPACT

d. Would the project result in inadequate emergency access?

The project would not involve the construction of any new roadways. Ingress/egress to the Park would be maintained and improved through construction of the additional drive aisle in the parking lot and the addition of a secondary access point for maintenance/emergency vehicles. As discussed under Checklist Item a, project construction equipment and staging areas would not interfere with the local circulation system. During construction, equipment staging would occur on-site, and construction personnel would park on-site, minimizing the potential for construction to result in inadequate emergency access. Adherence to Chapter 17.38 of the Goleta Municipal Code would ensure operation of the project would provide adequate egress for emergency access. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	□	■	□	□
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	□	■	□	□

Background

AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*
2. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.*

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

On May 16, 2023, Rincon contacted the NAHC and requested a search of the SLF. City staff also contacted NAHC and requested a contact list of Native Americans culturally affiliated with the project area. The NAHC responded on June 15, 2023, stating that the results of the SLF search were positive. The City prepared and mailed letters to local Native American groups listed in the SLF results on June 23, 2023.

Of the eight Native American groups, two responded and requested consultation: the Barbareño Band of Chumash Indians on July 12, 2023 and the Northern Chumash Tribal Council on July 14, 2023. The City held a virtual meeting with the Barbareño Band of Chumash Indians on July 14, 2023 and there was mutual agreement to keep them included during the development of plans to include information related to educational opportunities and native species plantings. The City held a virtual meeting with the Northern Chumash Tribal Council on July 31, 2023, who requested an interpretive panel be incorporated into the project design, that a Chumash monitor be present during ground disturbing activities, for the City to provide a copy of the CEQA compliant Cultural Resources Report.

As discussed in Environmental Checklist Section 5, *Cultural Resources*, although no resources were found on-site as part of the Phase 1 and Extended Phase I Studies, based on the presence of Native American resources nearby, the project site is considered sensitive for archaeological resources. Construction of the proposed park amenities would therefore have the potential to uncover previously unidentified tribal cultural resources, which could lead to damage or destruction of the resource. Impacts to tribal cultural resources would therefore be potentially significant. Mitigation Measures CR-1, CR-2, and CR-3 require a Worker's Environmental Awareness Program training, retain an on-call archaeologist, Native American monitoring, and adequate procedures to follow in case of unanticipated discovery of archaeological or tribal cultural resources, including halting of work to

evaluate the find. Although the City has not received any other responses requesting further consultation to date, the City will respond to any correspondence received from tribal contacts in response to these notices consistent with the requirements of AB 52. Impacts would be less than significant with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	□	□	■	□
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	□	□	■	□
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	□	□	■	□
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	□	□	■	□
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	□	□	■	□

Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Stow Grove Park is currently served by water, wastewater, stormwater, electric, gas, and telecommunication facilities. The project would require minor relocations or improvements of utilities, such as stormwater collection/drainage improvements and replacement of water line. However, these improvements would occur within the footprint of existing on-site development and

are included in the environmental analysis herein. As discussed in Environmental Checklist Item b, the project would not increase water demand such that off-site improvements would be necessary, and as discussed in Environmental Checklist Item c, the project would not exceed existing wastewater infrastructure capacity such that offsite improvements would be necessary. The project would not require relocation of utilities which would create significant environmental effects. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Water for the project would be provided by GWD, which relies on four sources of water to meet its existing and future demands: (1) surface water via the Cachuma Project; (2) surface water from the State Water Project (SWP); (3) groundwater from the Goleta Groundwater Basin; and (4) recycled water. According to the most recent Urban Water Management Plan, GWD has adequate water supplies to meet its projected demands through the year 2040 in normal, dry, and multiple dry years; the projected water supply in a normal year 2040 is 16,244 acre-feet (AF) (GWD 2021).

The project would require water to supply the caretaker's cottage, which is an existing use that would not operationally change as part of the project, as well as water to supply the new restroom. The project would continue to utilize water for landscaped park and recreational areas. The City's Urban Water Management Plan estimates the total amount of water required for landscaping purposes throughout the City as 445 AF in 2040 (GWD 2021).

Based on water demand generation factors included in the County's 2021 *Environmental Thresholds and Guidelines Manual and Guidelines Manual*, the new restroom would demand approximately 0.1 AFY.[8] The project's water use would be nominal, and constitute a fraction of the 445 AF, which is 2.7 percent of the City's total estimated water supply of 16,244 AF in 2040. The project would not result in substantial water supply reductions and sufficient water supply is available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. This impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Wastewater from the project would be collected and treated by the Goleta Sanitary District (GSD), which services approximately 80,000 people. GSD operates the Goleta Wastewater Treatment Plant, which has a maximum capacity of 9.7 million gallons per day (MGD) based on the average daily flow rate. However, the discharge is restricted under the facility's NPDES Order R3-2017-0021 permit CA0048160 to an average daily dry weather flow of 7.64 MGD (Central Coast RWQCB 2017). Current average daily dry weather flows are approximately 4.8 MGD, therefore, the Goleta Wastewater Treatment Plant operates with approximately 2.8 MGD average available capacity. (GSD 2018).

The project site is within GSD's service area and is currently served by GSD for wastewater produced by the existing on-site bathrooms and caretaker's cottage. The construction of a new on-site

[8] There is no generation factor for Open Space land uses in Goleta Valley in the County's 2021 *Environmental Thresholds and Guidelines Manual and Guidelines Manual*. The commercial land use water demand (0.3 AFY per 1,000 square feet) has been applied for the proposed 375 square foot restroom.

bathroom would not substantially increase wastewater production such that the project would exceed the Goleta Wastewater Treatment Plant's available capacity. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Waste generated within the City is handled at the South Coast Recycling and Transfer Station, where recyclable and organic materials are sorted. The remaining solid waste is disposed of at the Tajiguas Landfill, which is owned by the County of Santa Barbara. Waste collection and disposal services are provided by Marborg Industries in the City of Goleta. The Tajiguas Landfill has a maximum permitted capacity of 23.3 million cubic yards and a maximum daily capacity of 1,500 tons per day (California Department of Resources Recycling and Recovery [CalRecycle] 2023a). Construction of the project would generate minimal construction waste during repairs of existing amenities and resurfacing the parking lot. Construction contractors would be required to comply with CalGreen Construction and Demolition Debris Recycling Requirements, which require the diversion of 65 percent of construction waste. In addition, waste from construction activities would be temporary.

Pursuant to the County's *Environmental Thresholds and Guidelines Manual*, a project is considered to result in significant impacts if the project would generate an increase of 196 tons per year of solid waste sent to local landfills. The City maintains a Franchise Agreement with MarBorg Industries for waste collection and hauling services; MarBorg Industries currently provides solid waste services to the park. Operational solid waste generation would be minimal, given the project's existing use as a recreational and open space park, and would not exceed the City's project specific impact threshold of 196 tons of solid waste per year (County of Santa Barbara 2021). Therefore, the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

According to CalRecycle, the City, which is a part of the Santa Barbara Regional Integrated Waste Management Reporting Authority, is meeting its waste disposal requirements under AB 939 (CalRecycle 2023b). The project is a City Capital Improvement Project and would be required to comply with applicable solid waste diversion programs and state reduction statutes. Therefore, the project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	□	□	■	□
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	□	□	■	□
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	□	□	■	□
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	□	□	■	□

Impact Analysis

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project site is not located in a State Responsibility Area and is within the incorporated area of local responsibility (City of Goleta 2006a). Although the site is not located within a Fire Hazard Severity Zone, it is located approximately 80 feet south of a High Fire Hazard Severity Zone and one mile southeast of a Very High Fire Hazard Severity Zone (CAL FIRE 2023). As discussed in Environmental Checklist Section 9, *Hazards and Hazardous Materials*, the project would require the movement of construction equipment, hauling of construction materials, and transport of construction workers which could temporarily increase traffic on the roadways in the vicinity of the site. However, any minor delays during project construction would be temporary in nature and would not impair an

adopted emergency response plan or emergency evacuation plan. Therefore, impacts to emergency response plan or emergency evacuation plan would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project site is not located in a State Responsibility Area and is within the incorporated area of local responsibility (City of Goleta 2006a). Although the site is not located within a Fire Hazard Severity Zone, it is located approximately 80 feet south of a High Fire Hazard Severity Zone and one mile southeast of a Very High Fire Hazard Severity Zone (CAL FIRE 2023).

Construction equipment utilized on the site may produce sparks that could ignite vegetation. PRC Section 4442 mandates the use of spark arrestors, which prevent the emission of flammable debris from exhaust on earth-moving and portable construction equipment with internal combustion engines that are operating on any forest-covered, brush-covered, or grass-covered land. PRC Section 4428 requires construction contractors to maintain fire suppression equipment during the highest fire danger period (April 1 to December 1) when operating on or near any forest-covered, brush-covered, or grass-covered land. Therefore, in consideration of compliance with applicable PRC provisions, project construction would not substantially exacerbate wildfire risk.

Project components include the expansion and development of recreational amenities and the project would not construct housing or other habitable structures. Part of the grove restoration would include removal of dry/dead brush and limbs and provide new plantings with improved irrigation. The project would not expose project occupants to pollutant concentrations from wildfires, exacerbate wildfire risks through the installation or maintenance of infrastructure, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	□	■	□	□
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	□	□	■	□
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	□	□	■	□

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As discussed in Environmental Checklist Section 4, *Biological Resources*, the project site contains ESHA and habitat for three special status species. Mitigation Measures BIO-1 through BIO-5 include requirements related to monarch and tree protection and pre-construction nesting bird surveys. Additionally, the project would serve a beneficial purpose through the creation of the butterfly/pollinator garden, which would improve the long term quality of the monarch butterfly overwintering habitat, as well as restoration and habitat enhancements to the eucalyptus and native understory to improve long-term habitat for raptors and nesting birds.

As discussed in Environmental Checklist Section 5, *Cultural Resources*, and Section 18, *Tribal Cultural Resources*, Mitigation Measures CR-1, CR-2, and CR-3 would minimize potential effects of related to unanticipated discovery of cultural resources at the project Site. Since the project site does not contain important examples of the major periods of California history or prehistory, the project would not have a significant effect on these resources. All mitigation measures identified in this Initial Study would be included in the required Mitigation Monitoring and Reporting Program. Therefore, the project's potential impacts would be reduced below applicable thresholds of significance with mitigation incorporated.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

As described in the discussion of Environmental Checklist Sections 1 through 20, with respect to all environmental issues, potential impacts associated with project construction and operation would be no impact, less than significant, or reduced to a less than significant level with implementation of required mitigation. This is because project construction would be temporary and not exceed established thresholds of significance with implementation of required mitigation and project operation would not result in adverse effects on the environmental baseline conditions.

Cumulatively considerable impacts could occur if construction of other projects would occur at the same time as the project and in the same vicinity, such that the effects of similar impacts of multiple projects combine to expose a resource to greater levels of impact than would occur under the project. Certain resource areas (e.g., Geology and Soils, Hazards and Hazardous Materials) are by their nature specific to a project location, such that impacts at one location typically do not add to impacts at other locations. Other resource areas include an evaluation of potential cumulative impacts alongside the evaluation of project-level impacts. As noted in Environmental Checklist Section 3, *Air Quality*, and Section 8, *Greenhouse Gas Emissions*, the project would comply with the applicable plans and policies, along with other regulations that would reduce the project's air quality impacts and greenhouse gas emissions to less than-significant levels. The 2022 Ozone Plan is designed such that a project that demonstrates compliance with these items would not have an individually or cumulatively significant impact. Consequently, the project would not contribute considerably to a cumulative impact to air quality or greenhouse gas emissions.

The project is surrounded by residential development to the east and west, La Patera Elementary School to the west, and the extent of City limits to the north. Any cumulative projects that may be developed near Stow Grove Park would be subject to similar regulatory requirements as the proposed project. These include, but are not limited to, the federal Endangered Species Act, California Endangered Species Act, and Migratory Bird Treaty Act. These regulations are designed to protect individual species and their habitats. Cumulative projects would be required to abide by the provisions of these regulations and subject to review from agencies including, but not limited to, CDFW and USFWS, to ensure potential impacts to species or habitat are minimized. However, existing regulatory requirements alone cannot guarantee species loss, habitat loss, or other impacts to biological resources due to cumulative development would be avoided. The project may temporarily impact habitat utilized by special status species; however, the project would implement required mitigation measures, such as biological monitoring, implementation of species and tree protection and landscaping plans, and special status species relocation or avoidance, which would ensure the project

would not contribute considerably to a cumulative species loss, habitat loss, or other regional effects on biological resources.

Anticipated project impacts are temporary, localized effects that would occur during construction. As discussed in Environmental Checklist Sections 14, *Population and Housing*, Section 15, *Public Services*, and Section 19, *Utilities and Service Systems*, the project would not generate or induce growth in the area and existing utilities are available to service operation of the project. The project would not have significant long-term adverse environmental impacts or induce development in the area that could combine with other projects' effects to create cumulatively significant impacts. All environmental impacts that could occur as a result of the project would be reduced to a less-than-significant level through compliance with existing regulations and implementation of mitigation measures. The project would not increase beyond a level of significance project-generated impacts that would cumulatively impact the environment. Required mitigation measures would similarly ensure that the project's contribution to cumulative species loss, habitat loss, or other regional environmental effects, would not be cumulatively considerable. Therefore, the project would not result in a cumulatively considerable contribution to a significant cumulative impact.

LESS THAN SIGNIFICANT IMPACT

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

Impacts to human beings are typically associated with air quality, hazardous materials, noise, and wildfire impacts. These impacts are addressed in Environmental Checklist Section 4.3, *Air Quality*, Section 4.9, *Hazards and Hazardous Materials*, Section 4.13, *Noise,* and Section 4.20, *Wildfire*. As discussed in these sections, the project would not result in substantial adverse effects to humans due to the release of pollutants which would violate ambient air quality standards, would not result in the creation of public safety hazards due to exposure to hazardous materials, and would not result in the exposure to excessive noise or wildfire hazards. The project would not have environmental effects which would cause substantial adverse effects on human beings and impacts would be less than significant.

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