3.4 BIOLOGICAL RESOURCES

This section presents:

- changes to biological resources existing conditions and applicable regulations since adoption of the GP/CLUP and certification of the 2006 Final EIR; and
- an analysis of the potential biological effects of proposed amendments to the existing GP/CLUP.

3.4.1 Existing Conditions

The type, extent, and status of biological resources within the City are essentially the same as described in the 2006 FEIR. These resources are summarized below.

3.4.1.1 Habitats

Approximately 1,209 acres (24 percent) of the City are natural aquatic and terrestrial habitats. The three primary habitat types are nonnative grassland (approximately 572 acres); eucalyptus woodland (approximately 214 acres); and riparian, marsh, and vernal pool types (approximately 210 acres).Table 3.4-1 indicates the habitat types in the City as identified in the existing GP/CLUP and the estimated acres of each type. Figure 3.4-1 depicts the distribution of habitat types in the City, with habitat types grouped as indicated in Table 3.4-1.

As in the Final EIR, this Supplemental EIR identifies special-status habitats in terms of areas that meet the definition of *Environmentally Sensitive Habitat Areas* (ESHAs) in the Conservation Element (CE) of the GP/CLUP. ESHAs include but are not limited to the following resources:

- marine resources;
- beach and shoreline resources;
- creek and riparian areas;
- wetlands, such as vernal pools;
- coastal dunes, lagoons or estuaries, and coastal bluff scrub;
- coastal sage scrub and chaparral;
- native woodlands and savannahs, including oak woodlands;
- native grassland;
- monarch butterfly aggregation sites, including autumnal and winter roost sites, and related habitat areas;
- beach and dune areas that are nesting and foraging locations for the western snowy plover;
- nesting and roosting sites and related habitat areas for various species of raptors;
- other habitat areas for species of wildlife or plants designated as rare, threatened, or endangered under state or federal law; and
- any other habitat areas that are rare or especially valuable from a local, regional, or statewide perspective.

Figure 3.4-2 depicts the approximate location of ESHAs within the City and reflects three corrections to the ESHA map in the existing GP/CLUP and the Final EIR. The corrections are those identified in Alternative 3: the boundary of the raptor/butterfly ESHA along Comstock Homes' northern and western boundary was corrected to be consistent with the Comstock Homes FEIR; Old San Jose Creek is identified with the creek pattern; and the ESHA designation was changed from "Riparian/Marsh/Vernal" to "Native Upland Woodlands/Savannah" for parcels 069-090-050, 069-380-001, 069-380-003, 069-380-004, 069-391-001, 069-391-002, 069-391-006, 069-391-007, 069-391-008, 069-401-001, 069-401-002, 069-401-003, 069-401-013, 069-401-016, and 069-401-017. The change in ESHA type for the 15 parcels was made following an infield confirmation by City staff that the area is native upland woodlands and not riparian. Acres of ESHA types are indicated on Table 3.4-1 and are essentially the same as in the Final EIR. The change to the 15 parcels decreased the Riparian/Marsh/Vernal and increased Native Upland Woodland/Savannah by 2.8 acres . The other corrections did not affect the Citywide total of any ESHA type.

3.4.1.2 Species

As described in the GP/CLUP and 2006 Final EIR, habitats in the City support a wide variety of wildlife and fish species, but the diversity and abundance of species vary greatly between the habitats. The abundance and variety of wildlife are greatest in riparian and oak woodland habitats due to the presence of shelter, food, and linkages to the foothills. Annual grassland, although dominated by nonnative species, provides important foraging habitat for local raptors and nesting habitat for many birds.

As in the Final EIR, this Supplemental EIR defines *special-status species* as plant, fish, and wildlife species that have limited distribution or abundance, are particularly vulnerable to human disturbances, or have special educational, scientific, or cultural/historic interest. These include:

- plant, fish, and wildlife species that have been officially designated as rare, threatened, or endangered by the California Fish and Game Commission, U.S. Fish and Wildlife Service (USFWS), or National Marine Fisheries Service (NMFS);
- plant, fish, and wildlife species that have been officially proposed as rare, threatened, or endangered by the State or Federal governments, and are undergoing public review;
- plant species that have been included on List 1B (Rare and Endangered) of the California Native Plant Society (CNPS) Rare Plant Inventory of California; and
- fish and wildlife species that have been designated as Species of Special Concern by the DFG.

Table 3.4-2 identifies the special-status species associated with the habitat types known to occur in the City.

TABLE 3.4-1
HABITAT TYPES IN THE CITY OF GOLETA

Habitat Type	Acres
ESHA Types	
Native Grassland	33.7
Native Scrub Southern Foredunes Southern Dune Scrub Southern Coastal Bluff Scrub Coastal Sage Scrub Coyote Bush Scrub	74.6
Native Upland Woodland/Savannah[1] Coast Live Oak Woodland	31.4
Riparian/Marsh/Vernal Southern riparian scrub Southern willow scrub Disturbed southern willow scrub Southern riparian forest Southern cottonwood-willow riparian forest Coast live oak riparian forest South coast live oak riparian forest Disturbed south coast live oak riparian forest Coastal salt marsh Freshwater marsh Vernal marsh Vernal pool Vernal swale	207.4
Unvegetated Open Creek Channel	22.0
Open Water	31.1
Shoreline/Sand[2]	31.5
Monarch Butterfly and/or Raptor Roosting Habitat[3]	132.2
Subtotal	563.9
Other Land Cover Types	
Nonnative Grassland	572.0
Non-ESHA Eucalyptus Woodland[3]	72.0
Disturbed/Landscaped	204.6
Golf Course	145.1
Orchards/Crops	154.5
Developed	3,363.3
Subtotal	4,511.5
Total	5,075.4

Notes
ESHA = Environmentally Sensitive Habitat Area
1. Includes 0.1 acre occupied by Santa Barbara honeysuckle (a special status species)
2. Includes approximately 15.5 acres of Western Snowy Plover Critical Habitat
3. A subset of 214 total acres of eucalyptus woodland in the City

TABLE 3.4-2
SPECIAL-STATUS SPECIES ASSOCIATED WITH HABITATS IN THE CITY

Common Name/Scientific Name	Listing Status Fed/State/CNPS	Preferred Habitat
Plants		
Contra Costa goldfields *Lasthenia conjugens*	--/--/1B	Vernal pools
Coulter's goldfields *Lasthenia glabrata* spp *coulteri*	--/--/1B	Salt marsh
Coulter's saltbush *Atriplex coulteri*	--/--/1B	Coastal scrub; alkaline or clay soils
Davidson's saltbush *Atriplex serenana* var *davidsonii*	--/--/1B	Coastal scrub
Dunedelion *Malacothrix incana*	--/--/4	Dune
Estuary seablite *Suaeda esteroa*	--/--/4	Coastal scrub, salt marsh
Gambel's watercress *Nasturtium gambelli (= Rorippa gambellii)*	E/ST/1B	Wetland obligate
Late-flowered mariposa lily *Calochaortus weedii var. vestus*	--/--/1B	Chaparral, oak woodland
Marsh sandwort *Arenaria paludicola*	E/E/1B	Wetland obligate
Plummer's baccharis *Baccharis plummerae* ssp. *Plummerae*	--/--/4	Coastal scrub; rocky soils
Santa Barbara honeysuckle *Lonicera subspicata var subspicata*	--/--/1B	Chaparral, oak woodland
Southern tarplant *Hemizonia parryi* ssp *australis*	--/--/1B	Seasonal wetlands and vernal pools
Wooly seablite *Suaeda taxifolia*	--/--/4	Coastal scrub, salt marsh
Invertebrates		
Globose dune beetle *Coelus globosus*	-/-/-	Foredune
Monarch butterfly *Danaus plexippus*	-/SC/-	Woodland
Sandy beach tiger beetle *Cicindela hirticollis gravid*	-/-/-	Sandy beach, estuarine
Vernal pool fairy shrimp *Branchinecta lynchi*	T/-/-	Vernal pool
Fish		
Southern steelhead (Southern California ESU) *Oncorhynchus mykiss irideus*	E/SC/-	Marine, creek
Tidewater goby *Eucylogobius newberryi*	E/CSC/-	Estuarine
Amphibians		
Red-legged frog *Rana aurora draytonii*	T/CSC/-	Riparian corridors

(continued on next page)

TABLE 3.4-2 CONTINUED

Common Name/Scientific Name	Listing Status Fed/State/CNPS	Preferred Habitat
Reptiles		
California horned lizard *Phrynosoma coronatum frontale*	-/CSC/-	Chaparral and scrub
California legless lizard *Anniella pulchra pulchra*	-/CSC/-	Sandy dunes and washes
Coast patch-nosed snake *Salvadora hexalepis virgultea*	-/CSC/-	Scrub and chaparral
Southwestern pond turtle *Clemmys marmorata pallid*	-/CSC/-	Ponds and streams
Two-striped garter snake *Thamnophis hammondii*	-/CSC/-	Coastal streams
Birds		
Belding's savannah sparrow *Passerculus sandwichensis beldingi*	-/E/-	Salt marsh
Brown pelican *Pelecanus occidentalis californicus*	E/E/-	Coastal waters
Burrowing owl *Athene cunicularia*	BCC/CSC/-	Grasslands
California least tern (nesting) *Sterna antillarum browni*	E/E,FP/-	Sloughs, beaches
California thrasher *Toxostoma redivivum*	-/-/-	Chaparral
Coast horned lark *Eremophila alpestris actia*	-/CSC/-	Grasslands
Cooper's hawk *Accipiter cooperi*	-/CSC/-	Woodlands
Golden eagle *Aquila chrysaetos*	-/CSC/-	Grasslands, scrub, riparian
Least Bell's vireo *Vireo bellii pusillus*	E/E/-	Riparian
Light-footed clapper rail *Rallus longirostris levipes*	E/E,FP/-	Coastal waters, marsh
Loggerhead shrike *Lanius ludovicianus*	BCC/CSC/-	Grasslands
Merlin *Falco columbarius*	-/CSC/-	Grassland, scrub, riparian, marsh
Northern harrier *Circus cyaneus*	-/CSC/-	Grasslands
Osprey *Pandion haliaetus*	-/CSC/-	Coastal waters
Peregrine falcon *Falco peregrinus anatum*	BCC/E/-	Open water, riparian
Prairie falcon *Falco mexicanus*	BCC/CSC/-	Grasslands
Sharp-shinned hawk *Accipiter striatus*	-/CSC/-	Grasslands, woodlands
Short-eared owl *Asio flammeus*	-/CSC/-	Grasslands
Tricolored backbird *Agelaius tricolor*	BCC/CSC/-	Freshwater marsh

(continued on next page)

TABLE 3.4-2 CONTINUED

Common Name/Scientific Name	Listing Status Fed/State/CNPS	Preferred Habitat
Turkey vulture *Cathartes aura*	*	Eucalyptus trees
Western snowy plover *Charadrius alexandrinus nivosus*	T/CSC/-	Beaches, dunes
White-tailed kite *Elanus leucurus*	--/FP/-	Grasslands, woodlands
Yellow warbler *Dendroica petechia*	-/CSC/-	Riparian woodland
Yellow-breasted chat *Icteria virens*	-/CSC/-	Riparian woodland
Mammals		
Badger *Taxidea taxus*	-/CSC/-	Open scrub, grasslands
Pallid bat *Antrozous pallidus*	-/CSC/-	Rock crevices, caves, mines, structures
Townsend's big-eared bat *Corynorhinus townsendii*	--/CSC/-	Rock crevices, caves, mines, structures
Western red bat *Lasiurus blossevillii*	-/CSC/-	Grassland, scrub, woodland
Yuma myotis *Myotis yumanensis*	-/CSC/-	Open woodland with water

Codes
Federal
E = listed as endangered under the federal Endangered Species Act
T = proposed for federal listing as threatened under the federal Endangered Species Act
BCC = on the list of Birds of Conservation Concern (2002).
State
E = listed as endangered under the California Endangered Species Act
CSC = species of special concern in California
FP = Fully Protected under the California Endangered Species Act
* = Locally protected species
California Native Plant Society (CNPS)
1B = List 1B species: rare, threatened, or endangered in California
4 = List 4 species: plants about which more information is needed to determine their status and plants of limited distribution

Since certification of the 2006 Final EIR:

- USFWS has stopped maintaining lists of "species of concern" and instead refers to "species at risk."
- The State status of burrowing owl changed back to Species of Special Concern; and
- Based on CNDDB as of June 2008, additional records for the following special status species occurrence have been reported in or near the City: southwestern pond turtle, ferruginous hawk, and white-tailed kite.
- "Species at risk" include candidates for federal listing and birds of conservation concern, together with lists maintained by other agencies and organizations. Candidate species and birds of conservation concern are identified in Table 3.4-2. Known occurrences of special-status species are shown in Figure 3.4-2 based on available records when the Final EIR was prepared.

3.4.1.3 Wildlife Linkages

There have been no substantive changes in the remaining wildlife linkages within in the City since 2006. For ground-dwelling vertebrates, habitats in the City are more or less isolated from large expanses of similar habitats in the foothills of the Santa Ynez Mountains. City creeks are the last remaining physical linkages between the coast and relatively undisturbed and unfragmented habitats to the north of the City. Linkages provided by local creeks may occur only infrequently because there are many intervening barriers to dispersal, such as transportation corridors and associated culverted undercrossings and urban development.

3.4.1.4 Existing Preserves

There have been no additional preserves established in the City since 2006. The four existing nature preserves in the City are: Lake Los Carneros Natural and Historical Preserve (139.9 acres), Sperling Preserve (136.6 acres), Santa Barbara Shores Park (91.7 acres), and Coronado Preserve (6.9 acres). Note that the Sperling Preserve, Santa Barbara Shores Park, and the Coronado Preserve are collectively known as the Ellwood Mesa Open Space.

3.4.2 Changes in Regulatory Framework

3.4.2.1 Federal

There have been no substantial changes since 2006 to the following federal laws and regulations that pertain to the protection of the biological resources within the City:

- Endangered Species Act of 1973
- National Environmental Policy Act, 42 USC Section 4321 et seq.
- Fish and Wildlife Coordination Act
- Migratory Bird Treaty Act
- Clean Water Act of 1977, Section 404 and 401
- Federal Coastal Zone Management Act

Although no changes were made to the law itself, recent court decisions regarding the Clean Water Act are relevant to this Supplemental EIR because of requirements relating to identification of waters of the U.S. The court cases are Rapanos v. United States and Carabell v. United States Army Corps of Engineers (USACE).

In 2006, the U.S. Supreme Court again issued an opinion as to what extent the USACE had jurisdiction over certain waters under Section 404 of the CWA. The Rapanos-Carabell consolidated decisions addressed the question of jurisdiction over attenuated tributaries to waters of the United States as well as wetlands adjacent to those tributaries. In a plurality decision, five of the nine justices remanded both cases to the lower courts for re-evaluation. However, those five justices were not in alignment as to what the test for determining jurisdiction should be.

Justices Scalia, Roberts, Thomas, and Alito filed an opinion that held that “waters of the United States” includes only those relatively permanent, standing or continuously flowing bodies of water “forming geographic features” that are described in ordinary phrasing as “streams,

oceans, river and lakes," (i.e., with surface water connection to navigable waters). By describing "waters" as "relatively permanent" the court does not exclude streams, rivers, or lakes that might dry up in extraordinary circumstances such as drought or seasonal rivers, which contain continuous flow during some months of the year but no flow during dry months (Rapanos et al. v. United States, 547 U.S. 04-1034 2006). Justice Kennedy, in a separate opinion, concurred with Scalia, Roberts, Thomas, and Alito in their judgment that the USACE had potentially exceeded its authority. However, he concluded that Congress enacted the CWA to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters" (33 U.S.C. §1250(a)), and it pursued that objective by restricting dumping and filling in "waters of the United States" (§§1311(a), 1362(12)). The rationale for CWA wetlands regulation is that wetlands can perform critical functions related to the integrity of other waters, such as pollutant trapping, flood control, and runoff storage (33 C.F.R. §320.4(b)(2)). Accordingly, tributaries and adjacent wetlands possess the requisite nexus and thus come within the statutory phrase "navigable waters," if the tributaries and adjacent wetlands, alone or in combination with similarly situated lands in the region, significantly affect the chemical, physical, and biological integrity of other covered waters understood as navigable in the traditional sense. In summary, the CWA's jurisdiction reaches tributaries and other waters and wetlands with a significant nexus to waters that are in fact navigable or could reasonably be made so. In addition, the USACE must establish a significant nexus on a case-by-case basis when seeking to regulate wetlands based on adjacency to nonnavigable tributaries, in order to avoid unreasonable applications of the CWA.

The USACE and Environmental Protection Agency (EPA) issued guidance related to the *Rapanos* decision on June 5, 2007. The guidance identifies those waters over which the agencies (USACE and EPA) will assert jurisdiction categorically and on a case-by-case basis, based on the reasoning of the *Rapanos* opinions. In summary, the USACE will continue to assert jurisdiction over:

1. Traditional navigable waters (TNWs) and their adjacent wetlands.
2. Nonnavigable tributaries of TNWs that are relatively permanent (e.g., tributaries that typically flow year-round or have a continuous flow at least seasonally) and wetlands that directly abut such tributaries (e.g., not separated by uplands, berm, dike, or similar feature). Note*: Relatively permanent waters (RPWs) do not include ephemeral tributaries, which flow only in response to precipitation, and intermittent streams, which do not typically flow year round or have continuous flow at least seasonally (e.g., typically three months).*
3. Non-RPWs if determined (on a fact-specific analysis) to have a significant nexus with a TNW, including nonnavigable tributaries that do not typically flow year round or have continuous flow at least seasonally; wetlands adjacent to such tributaries; and wetlands adjacent to but that do not directly abut a relatively permanent, nonnavigable tributary. Absent a significant nexus, jurisdiction is lacking.

A significant nexus exists if the tributary, in combination with all of its adjacent wetlands, has more than a speculative or an insubstantial effect on the chemical, physical, and/or biological integrity of a TNW. Principal considerations when evaluating significant nexus include volume, duration, and frequency of the flow of water in the tributary and the proximity of the tributary to a TNW, plus hydrologic, ecologic, and other functions performed by the tributary and all of its adjacent wetlands.

Swales or erosional features (e.g., gullies and small washes characterized by low volume, infrequent, or short duration flow) are generally not waters of the United States because they

are not tributaries or they do not have a significant nexus to downstream traditional navigable waters. In addition, ditches (including roadside ditches) excavated wholly in and draining only uplands and that do not carry a relatively permanent flow of water are generally not waters of the United States because they are not tributaries or they do not have a significant nexus to downstream TNWs. Certain ephemeral waters in the arid west are distinguishable from the geographic features described above where such ephemeral waters are tributaries and have a significant nexus to downstream traditional navigable waters. For example, these ephemeral tributaries may serve as a transitional area between the upland environment and the traditional navigable water. These ephemeral tributaries may provide habitat for wildlife and aquatic organisms in downstream traditional navigable waters and support nutrient cycling, sediment retention and transport, pollutant trapping and filtration, and improvement of water quality. Even when not jurisdictional under Section 404 of the CWA, these features may still be jurisdictional at state or local levels, such as under Section 401 of the CWA, the Porter-Cologne Act, and/or Section 1602 of the California Fish and Game Code.

Prior to the *Rapanos* guidance, the USACE required the districts to request concurrence for only those jurisdictional determinations (JDs) where the district was planning to assert jurisdiction over a nonnavigable, intrastate, isolated water and/or wetland. The agencies now require that all determinations for nonnavigable, isolated waters be evaluated for the USACE and EPA headquarters review prior to the district making a final decision on the JD.

3.4.2.2 State

There have been no substantial changes since 2006 to the following state laws and regulations that pertain to the protection of the biological resources within the City:

- California Fish and Game Code, including the California Endangered Species Act
- Native Plant Protection Act of 1977
- California Coastal Act Section 30000 et seq.
- State of California General Plan Law and General Plan Guidelines
- California Coastal Act
- California Environmental Quality Act

3.4.2.3 Local

City of Goleta General Plan and Ordinances

Since adoption of the GP/CLUP and certification of the Final EIR, the City adopted five sets of General Plan amendments. First, the City adopted an amendment to Subpolicy CE 10.3 as part of the approval of the Village at Los Carneros. The amendment changed prohibitions against post-development stormwater discharge rates and was adopted on February 19, 2008. Second, the City adopted various clarifying amendments as part of the City-sponsored Track 2 amendments. The Track 2 amendments were adopted and the related CEQA Addendum was certified by the City Council on June 17, 2008. Third, the City adopted a land use designation re-classification (General Industrial to General Commercial) as part of the approval of the Harwin Family Trust project. Fourth, the City adopted various amendments related to Building Intensity Standards. The Track 2.5 amendments were adopted and the related CEQA Addendum was certified on May 19, 2009. These four amendments are reflected in the text of the GP/CLUP cited in the Supplemental EIR.

The fifth amendment is a revision to CE 2.2. The amendment was initially proposed in November 2007 (prior to the initiation of the Draft SEIR for the Track 3 amendments) in connection with a specific project (Haskell's Landing) and was adopted on May 19, 2009. The amended policy is stated below, with changes to the prior version of CE 2.2 shown in ***bold italic***.

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

a. In areas where land has already been fully subdivided and developed, the SPA ***upland*** buffer shall not be less than 50 feet outward on both sides of the creek, measured from the top of the bank or the outer limit of associated wetlands and/or riparian vegetation, whichever is greater. Exceptions may be allowed in instances where existing permitted development on a subject parcel encroaches within the 50-foot buffer, only if:

   (1) there is no feasible alternative siting for the development that will avoid the SPA;

   (2) the new development will not extend into an ESHA, and the resulting buffer will not be less than 25 feet; and

   (3) the new development will not encroach further into the SPA than the existing development on the parcel.

b. In all other instances, the SPA ***upland*** buffer shall not be less than 100 feet outward on both sides of the creek, measured from the top of the bank or the outer limit of associated wetlands and/or riparian vegetation, whichever is greater. ***If there is no feasible alternative siting for the development that will avoid the SPA, the City may consider changing the width of the SPA upland buffer on a case-by-case basis at the time of environmental review. Based on a site-specific assessment, the City may designate portions of an SPA upland buffer to be less than or greater than 100 feet wide, but not less than 50 feet, only if:***

   (1) substantial beneficial environmental improvements to the creek, its SPA, and/or related ESHAs are to be made as part of the project;

   (2) the new development will not extend into an ESHA, and the resulting buffer will not be less than 50 feet; and

   (3) the project's impacts will not have significant adverse effects on streamside vegetation or the biotic quality of the stream.

c. If the provisions above would result in any legal parcel created prior to the date of this plan being made unusable in its entirety for any purpose allowed by the land-use plan, exceptions to the foregoing may be made to

allow a reasonable economic use of the parcel, subject to approval of a conditional use permit. *(Amended by Reso. 09-30, 5/19/09)*

Compared with the alternatives considered in the Draft SEIR, this newly adopted policy can be viewed as a combination of Alternative 1 and 3. Technically, the new policy is the existing GP/CLUP policy. For purposes of the Final SEIR, the new policy is identified as Alternative 1a and the prior policy is identified as Alternative 1b in Table 2-1. The analysis in the Draft SEIR of potential impacts associated with alternatives does not require revision because the potential effects of Alternative 1a are encompassed by the analysis of Alternatives 1b and 3. Although no longer the existing policy, Alternative 1b has been retained in the Final SEIR as a potential choice for the City. That action is covered both by the Final SEIR and the 2006 Final EIR for the GP/CLUP. Unless otherwise noted, all references to CE 2.2 under Alternative 1 are to the policy as worded prior to May 19, 2009.

In addition to the four amendments, the City has also established a new ordinance to the municipal code, Chapter 25b, titled "Change of Owner, Operator, or Guarantor for Certain Oil and Gas Facilities." No other changes to the GP/CLUP and no new ordinances relative to land use designations and densities have been enacted by the City since October 2006. There have been modifications to enabling ordinances and resolutions related to the Design Review Board's review of projects and process. Moreover, in fall 2008, the City modified the Goleta Growth Management Ordinance to exempt from its consideration the Goleta Valley Cottage Hospital Replacement Projects, along with associated medical office space and parking.

3.4.3 Project Impacts and Mitigation

As in the 2006 Final EIR, the evaluation in this Supplemental EIR concerns the potential effects on biological resources that would result from implementation of the GP/CLUP policies and, in this case, from alternate versions of those policies in the form of GP/CLUP amendments.

3.4.3.1 Thresholds of Significance

The thresholds of significance applied in this Supplemental EIR are the same as those in the Final EIR.

City of Goleta Environmental Thresholds Manual

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

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

Determination of impacts is done on a project-by-project basis. Because of the complexity of biological resource issues, substantial variation can occur between projects. Impact assessment

must account for both short-term and long-term impacts. Impacts are classified as significant or less than significant, depending on the size, type, and timing of the impact and the biological resources involved. Disturbance to habitats and/or species are considered significant if they affect significant biological resources in the following ways:

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

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

CEQA Thresholds

The City of Goleta also assesses impacts based on the State CEQA Guidelines. As suggested by Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.), a proposed project may have a significant impact on biological resources if it would:

1. 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 DFG or USFWS.
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the DFG or USFWS.
3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
4. 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.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

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

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

3.4.3.2 Discussion of Relevant GP/CLUP Policies

The action under consideration by the City is to amend the existing GP/CLUP to approve the changes in Alternatives 2a, 2b, or 3, combine or eliminate changes proposed in Alternatives 2a, 2b, and 3, or choose not to change the GP/CLUP at this time (Alternative 1).

Existing GP/CLUP Policies

The existing Conservation, Open Space, and Land Use elements of the GP/CLUP contain policies to protect biological resources by:

- designating specific resources and areas as protected,
- restricting activities and uses in protected areas,
- providing for the management of the resources on City lands,
- requiring project-level review and project-level impact avoidance, minimization, and mitigation measures for types of activities and by type of affected biological resource, and
- providing guidance for development and conservation decisions over the long-term.

The policies anticipate the potential impacts to biological resources from the land uses and activities that will occur under the GP/CLUP and serve to avoid, reduce, and/or mitigate those impacts. Table 3.4-3 lists these policies and indicates if the policy specifies resource protection/preservation, resource management, impact avoidance, impact mitigation, or other resource-related actions. To provide a context for comparing alternatives, policies proposed for change in Alternatives 2a, 2b, or 3 are highlighted in bold. It should be noted that the amendments propose changes to one or more sub-policies, not necessarily to the policy as a whole. Additional descriptions of these policies in the existing GP/CLUP follow Table 3.4-3.

TABLE 3.4-3
EXISTING GP/CLUP POLICIES RELEVANT TO PRESERVATION OF AND REDUCTION OF IMPACTS TO BIOLOGICAL RESOURCES

GP/CLUP Element/ Policy Number and Name	Preservation	Management	Restricted Use	Impact Avoidance	Impact Mitigation	Design Criteria/BMPs
Conservation Element						
CE 1: ESHA Designations and Policy	**X**	**X**	**X**	**X**	**X**	**X**
CE 2: Protection of Creeks and Riparian Areas	**X**	**X**	**X**	**X**	**X**	**X**
CE 3: Protection of Wetlands	**X**	**X**	**X**	**X**	**X**	**X**
CE 4: Protection of Monarch Butterfly Habitat Areas	X	X	X	X	X	X
CE 5: Protection of Other Terrestrial Habitat Areas	X	X	X	X		
CE 6: Protection of Marine Habitat Areas	X	X	X	X		X
CE 7: Protection of Beach and Shoreline ESHAs	**X**	**X**	**X**	**X**		**X**
CE 8: Protection of Special-Status Species	**X**			**X**		**X**
CE 9: Protection of Native Woodlands	**X**			**X**	**X**	**X**
CE 10: Watershed Management and Water Quality		X		X		
Open Space Element						
OS 1: Lateral Shoreline Access		**X**		**X**	**X**	**X**
OS 2: Vertical Access to the Shoreline		X		X	X	X
OS 3: Coastal Access Routes, Parking, and Signage				X		X
OS 4: Trails and Bikeways		X	X	X	X	X
OS 5: Ellwood-Devereux Open Space Area	X	X	X	X	X	X
OS 6: Public Park System Plan		X	X	X		X
OS 7: Adoption of Open Space Plan Map	**X**	**X**	**X**		**X**	
OS 8: Financing Public Parks, Open Space, and Recreation Facilities		X			X	
Land Use Element						
LU 1: Land Use Plan Map and General Policies						X
LU 6: Park and Open Space Uses		X	X			
LU 9.4: Site #4 Santa Barbara Shores Park and Sperling Preserve			X			X
LU 12: Land Use in Goleta's Environs				X		X

Bold text = policies where changes to one or more sup-policies are proposed in Alternatives 2a, 2b, or 3.

Existing Conservation Element

Policies in the existing Conservation Element reinforce State and Federal regulations that protect special-status habitats and species and apply additional local restrictions to identify, preserve, and protect the City's biological resources. Protections and guidelines are stated in Policy CE 1, which includes the following provisions:

- No development, except as otherwise allowed by Policy CE 1 is allowed within ESHAs.
- A setback or buffer separating all permitted development from an adjacent ESHA is required and must meet the minimum width requirements identified in the Conservation Element.

- Public accessways and trails are considered resource-dependent uses and may be located within and adjacent to ESHAs.
- Where there are no feasible, less environmentally damaging alternatives, the following uses may be located in ESHAs and ESHA buffers provided that measures are implemented to avoid or lessen impacts to the maximum extent feasible: public road crossings, utility lines, resource restoration and enhancement, nature education, and biological research.
- Exceptions may be made to allow a reasonable economic use of a parcel, provided the development footprint does not exceed 20 percent of the parcel area. Alternatively, the City may establish a program to allow transfer of development rights from the constrained parcel to other suitable areas.
- Any land use, construction, grading, or removal of vegetation that is not specified in Policy CE 1 is prohibited.
- New development must be sited and designed to avoid impacts to ESHAs. If there are no feasible alternatives that can eliminate all impacts, the alternative with the fewest or least significant impacts will be selected. Any impacts that cannot be avoided must be fully mitigated. Onsite mitigation will be given priority; offsite mitigation will be approved only when is it not feasible to mitigate fully onsite.
- Development adjacent to an ESHA must minimize impacts to habitat values or sensitive species in the ESHA area to the maximum extent feasible.
- ESHA buffers shall have native habitat to serve as transitional habitat and must be of sufficient size to ensure the biological integrity and preservation of the ESHA they are intended to protect.
- Development in or adjacent to ESHA is subject to the following standards:
    - Site designs shall preserve wildlife corridors or habitat networks.
    - Land divisions for parcels (except for open space lots) shall be allowed only if the new lot(s) can be developed without building in an ESHA or ESHA buffer and without impacts to ESHAs related to fuel modification for fire safety purposes.
    - Site plans and landscaping shall be designed to protect ESHAs, with priority given to protecting, supporting, and enhancing wildlife habitat values. Planting of nonnative invasive species is prohibited in ESHAs and ESHA buffers.
    - All new development shall be sited and designed to minimize grading, alteration of natural landforms and physical features, and vegetation clearance in order to reduce or avoid soil erosion, creek siltation, increased runoff, and reduced infiltration of stormwater and to prevent net increases in baseline follows for any receiving water body.
    - Light and glare will be controlled and directed away from wildlife habitat. Exterior night lighting shall be minimized, restricted to low intensity fixtures, shielded, and directed away from ESHAs.
    - Noise levels from new development should not exceed an exterior noise level of 60 L_{dn} at the habitat site. During construction, this level may be exceeded if it can be demonstrated that significant adverse impacts on wildlife will be avoided or will be temporary.
    - All new development shall be sited and designed to minimize the need for fuel modification or weed abatement for fire safety in order to preserve natural vegetation in and adjacent to ESHAs.

  - The timing of grading and construction activities shall be controlled to minimize potential disruption of wildlife during critical time periods such as nesting or breeding seasons.
  - Grading, earthmoving, and vegetation clearance adjacent to an ESHA shall be prohibited during the rainy season, generally from November 1 to March 31, except where necessary to protect or enhance the ESHA or to remediate hazardous flooding hazardous geologic conditions.
  - In areas not adjacent to ESHAs where grading may be allowed, erosion control measures shall be implemented prior to and concurrent with all grading operations.

- Management of ESHAs is subject to the following standards:
  - Use of insecticides, herbicides, artificial fertilizers, or other toxic chemical substances that have the potential to degrade ESHAs are prohibited in and adjacent to ESHAs, except where necessary to protect or enhance the ESHA.
  - Use of insecticides, herbicides, or other toxic substances by City employees and contractors in construction and maintenance of City facilities and open space shall be minimized.
  - Mosquito abatement in and adjacent to ESHAs shall be limited to implementation of the minimum measures necessary to protect human health and shall be undertaken in a manner that minimizes adverse impacts to ESHAs.
  - Weed abatement and brush-clearing for fire safety purposes shall be the minimum necessary to accomplish the intended purpose and shall be limited to mowing. Disking is prohibited.
  - Where there are feasible alternatives, existing sewer lines and other utilities that are located in an ESHA shall be taken out of service, abandoned in place, and replaced with facilities outside the ESHA.
  - Removal of nonnative invasive plant species in ESHAs may be allowed, unless the nonnatives contribute to habitat values.
  - Desilting, obstruction clearance, and minor vegetation removal may be allowed in creek and creek protection areas.

Other policies in the Conservation Element provide additional details regarding preservation, impact avoidance and reduction, and project-level standards for specific types of ESHA, including creeks and riparian areas, wetlands, monarch butterfly habitat areas, other terrestrial habitat areas (native grasslands, coastal sage scrub and chaparral), marine habitat areas, beach and shoreline habitats, special status species, and native woodlands.

Existing Open Space Element

The existing Open Space Element integrates the ESHA-related requirements into the City's policies regarding open space, recreation, and coastal access, with an emphasis on coastal public accessways, trails, the Ellwood-Devereux Open Space Area, the City's park system, and adoption of the Open Space Map. The accessway and trail policies indicate that impact avoidance and minimization is required in areas with sensitive habitats.

- Policy OS 5 incorporates the relevant provisions of Ellwood-Devereux Open Space and Habitat Management Plan into the GP/CLUP. Key park-related policies identify standards for and restrict uses of neighborhood and regional open space areas.

- Policy OS 6 identifies neighborhood open space as areas that integrate natural features and undeveloped landscape with the adjacent neighborhood and sets the following standards for such areas: (1) primary emphasis is on the protection of the natural resource; and (2) uses are limited to passive recreation, such as trails, with structural or land improvements (except dirt trails and resting areas) are to be avoided. Policy OS 6 also identifies regional open space as areas that are contiguous to or encompass significant natural resources and sets the following standards for such areas: (1) they should be easily accessible from surrounding neighborhoods, (2) they are designed to be primarily passive in character, and (3) they are intended to protect open space and natural values.
- Policy OS 7 (Adoption of the Open Space Map) is intended to designate, preserve, and protect significant open space resources, including the natural resources identified in the Conservation Element as ESHAs. Standards that apply to areas designated as open space for preservation of natural resources are as follows:
    - The designated natural resource areas shall be managed by the City in accordance with the policies described in the Conservation Element.
    - The City may require dedication of open space easements as a condition of approval for development on sites that have open space resources as shown on GP/CLUP Figure 3-5.
    - The City encourages the donation of easements or fee-simple interests in open space lands to the City or other appropriate nonprofit entity, such as a land trust.

Existing Land Use Element

The Land Use Element indicates that all new development must meet high environmental standards for the preservation and protection of sensitive resources, including the standards for ESHAs identified in the Conservation Element.

- Policy LU 6 sets the criteria and standards for open space/passive recreation uses on areas with significant environmental values or resources, wildlife habitats, significant views, and other open space values. These criteria and standards require that open space lands be maintained in a natural condition to protect and conserve sensitive habitats, allow management activities such as habitat restoration, allow only minimal improvements to accommodate passive public uses, prohibit active recreational uses involving structures or similar improvements to the land, and allow limited parking and public access improvements providing that impacts on resources are avoided or reduced.
- Policy LU 9 specifies the uses and restrictions on the parcels comprising the Santa Barbara Shores Park and Sperling Preserve, as also specified in the Ellwood-Devereux Coast Open Space and Habitat Management Plan.
- Policy LU 12 describes the City's intent to address resource protection and impact avoidance and mitigation issues on lands outside the City but within its planning and service areas consistent with the policies that apply within the City.

Proposed Amendments

The City is considering amendments to 34 sections of the existing GP/CLUP, including alternate versions of amendments to 20 of the sections; 29 of the sections are in the Conservation and Open Space elements and concern protection of natural resources (see Table 2-1 for wording of each proposed change). Table 3.4-4 summarizes which Conservation and Open Space policies and sub-policies are proposed for change under Alternatives 2a, 2b, and 3 and if the same or different changes are proposed to the same section. Table 3.4-4 is intended to show where

alternatives propose the same or different wording for policy amendments. For example, Alternatives 2a and 2b include similar revisions to CE 1.1, while Alternative 3 proposes a different approach to policy wording. The other proposed changes are to sections of the Land Use and Transportation elements, plus a change to the lateral access policy in the Open Space element. Because these other amendments do not entail changes that would increase the amount of land developed in the City or alter the protection of biological resources under the GP/CLUP, they are not considered further in this analysis.

TABLE 3.4-4
SECTIONS OF CONSERVATION AND OPEN SPACE ELEMENTS PROPOSED FOR CHANGE UNDER ALTERNATIVES 2a, 2b, AND 3

GP/CLUP Element/Section Proposed for Change	Alternative 2a	Alternative 2b	Alternative 3
Conservation Element			
CE 1.1. Definition of Environmentally Sensitive Habitat Areas	S	S	V
CE 1.2. Designation of Environmentally Sensitive Habitat Areas	S	S	V
CE 1.3. Site-Specific Studies and Unmapped ESHAs.	S	S	NC
CE 1.5 Corrections to Map of ESHAs.	S	S	S
CE 1.6. Protection of ESHAs.	S	V	S
CE 1.9 Standards Applicable to Development Projects	S	S	V
CE 2.2 Streamside Protection Areas	V	V	V
CE 2.3. Allowable Uses and Activities in Streamside Protection Areas	S	S	S
CE 2.5. Maintenance of Creeks as Natural Drainage Systems	S	S	S
CE 3.1. Definition of Wetlands	S	V	S
CE 3.4. Protection of Wetlands in the Coastal Zone	S	V	S
CE 3.5. Protection of Wetlands Outside the Coastal Zone	V	V	V
CE 4.5. Buffers Adjacent to Monarch Butterfly ESHAs	S	S	V
CE 4.6. Standards Applicable to New Development Adjacent to Monarch ESHAs	S	S	V
CE 5.1. Designation of ESHAs	S	S	V
CE 5.3. Protection of Coastal Sage Scrub and Chaparral	S	S	V
CE 8.1. ESHA Designation	S	S	V
CE 8.2. Protection of Habitat Areas	S	S	V
CE 8.4. Buffer Areas for Raptor Species	V	V	V
CE 9.1. Definition of Protected Trees	S	S	S
CE 9.3. Native Oak Woodlands or Savannas	S	S	V
CE 9.4. Tree Protection Standards	S	S	S
CE 9.5. Mitigation of Impacts to Native Trees	S	S	S
CE 10.3, Incorporation of Best Management Practices for Stormwater Mgmt	S	S	V
CE-IA-4. Preparation of a Tree Protection Ordinance	S	S	S

(continued on next page)

TABLE 3.4-4 CONTINUED

GP/CLUP Element/Section Proposed for Change	Alternative 2a	Alternative 2b	Alternative 3
Conservation Element			
CE Page 4 2 (text revision)	S	S	NC
CE Figure 4-1 (ESHA Map)	S	S	V
CE Table 4-2 (ESHA Table)	V	V	NC
Open Space Element			
OS 7.3. Open Space for Preservation of Natural Resources.	S	S	NC

Codes
S = Same Change Proposed
V = Different Change Proposed
NC = No Change Proposed

3.4.3.3 Project Impacts

Methodology

Final EIR

In the Final EIR, the source of direct and indirect impacts was identified as: (1) the conversion of existing vacant sites to the land uses designated for those areas in the GP/CLUP, (2) the construction of the roads, trails, parks, and public facilities identified in the GP/CLUP; and (3) the maintenance and management of the roads, trails, parks, and public facilities. These three groups of activities were analyzed on a "program" level. The analysis considered whether the type of activity (e.g., construction of trails) had the potential to affect biological resources and, based on the maps and descriptions in the GP/CLUP, would occur in areas with sensitive biological resources. The potential for impacts to specific resources was analyzed as follows:

- Habitat impacts were examined in terms of potential habitat loss (temporary and permanent), habitat degradation, and habitat fragmentation. All ESHAs identified in the GP/CLUP were treated as special-status habitats.
- Species impacts were examined in terms of harm or displacement of listed species; loss, reduction, or isolation of local populations of native species; and reduction in the amount or quality of habitat for special status species.
- Impacts to wildlife linkages were examined in terms of land uses and activities that: 1) break or substantially narrow an existing linkage, or 2) degrade the habitat quality and function of an existing linkage.
- Impacts to existing preserves and approved conservation programs/plans were examined in terms of inconsistencies of proposed uses or policies and loss or degradation of conserved habitat.

Identified impacts were evaluated in terms of their potential significance based on the thresholds indicated in subsection 3.4.3.1 and the classes of impacts (I through IV) used by the City for CEQA analyses. Cumulative impacts were examined in terms of the combined effects of the

impacts associated with GP/CLUP implementation and foreseeable projects in areas adjacent to the City. Residual impacts were examined in terms of the potential for significant effects to occur after mitigation of any Class I, Class II, or significant cumulative impacts. The Final EIR also identified GP/CLUP policies that would reduce potentially significant impacts resulting from Plan buildout to less-than-significant levels.

Supplemental EIR

This Supplemental EIR applies the same methodology used in the Final EIR, with the following additional considerations regarding the proposed amendments:

1. Is the change to a policy cited as mitigation for a Class II impact of the existing GP/CLUP?
2. If the change were accepted, would implementation of the amended GP/CLUP result in greater or different impacts than those analyzed in the Final EIR?
3. Does the change have the potential to result in: potentially significant impacts to biological resources; inadequate mitigation for a Class II impact identified in the Final EIR; or a cumulatively significant impact when considering the combined effects of the individual changes proposed in an alternative?

The examination of potential impacts in this Supplemental EIR is divided into two components. Potentially significant impacts associated with individual changes is presented in the "Amendment-level Analysis" section. The effects of each alternative are examined in the "Program-level Analysis" section.

Amendment-level Analysis

To assess the potential effects of individual amendments, a preliminary screening was conducted in which the questions above were applied to each proposed change in each alternative. The results of the evaluation are presented in detail in Appendix B.

- Table 3.4-5 identifies the biological impacts identified in the Final EIR mitigated by CE or OS policies proposed for revision under one or more alternative.
- Table 3.4-6 identifies the proposed changes in each alternative that were identified in the screening as having the potential to result in significant impacts to biological resources and/or inadequate mitigation for a Class II impact identified in the Final EIR.
- Table 3.4-7 identifies the types of potentially significant impacts associated with each alternative.
- Table 3.4-8 identifies the factors that reduce the potentially significant impacts associated with the proposed amendments.

In response to comments on the proposed changes to CE 2.2, clarifying information about the resources within 50 and 100 feet of creeks in the City was compiled and added to this Final SEIR. The additional information is provided following Table 3.4-8.

TABLE 3.4-5
POLICIES PROPOSED FOR AMENDMENT THAT ARE CITED AS MITIGATION FOR CLASS II BIOLOGICAL RESOURCES IMPACTS IN FINAL EIR

Class II Biological Impacts in the 2006 Final EIR	GP/CLUP Policy Proposed for Change and Cited in Final EIR as Mitigation for Class II Impacts								
	CE 1	CE 2	CE 3	CE 4	CE 5	CE 8	CE 9	CE 10	OS 7
Impact 3.4-1. Temporary Impacts to Special-Status Habitats and Species	●	●	●	●	●	●	●	●	●
Impact 3.4-2. Loss of Special Status Habitats	●	●	●	●	●		●	●	●
Impact 3.4-3. Long-Term Degradation of Special Status Habitats	●	●	●	●	●		●	●	
Impact 3.4-4. Fragmentation of Special Status Habitats	●	●	●	●	●		●	●	●
Impact 3.4-5. Harm to Listed Species	●	●	●	●	●	●	●	●	
Impact 3.4-6. Loss, Reduction, or Isolation of Local Populations of Native Species	●	●	●	●	●	●	●	●	●
Impact 3.4-7. Reduction in Amount or Quality of Habitat for Special Status Species	●	●	●	●	●	●	●	●	●
Impact 3.4-8. Break or Impairment of Function of Existing Wildlife Linkages	●	●	●	●	●		●	●	●
Impact 3.4-9. Loss or Degradation of Conserved Habitat	●	●	●	●	●		●	●	●
Impact 3.4-10. Inconsistency with Approved Conservation Program or Local Conservation Policy	●	●	●	●	●		●	●	●

TABLE 3.4-6
POTENTIAL FOR PROPOSED AMENDMENTS TO RESULT IN SIGNIFICANT IMPACTS

GP/CLUP Element/Section with Proposed Amendment	Alternative 2a	Alternative 2b	Alternative 3
CE 1.1. Definition of Environmentally Sensitive Habitat Areas	N	N	N
CE 1.2. Designation of Environmentally Sensitive Habitat Areas	Y	Y	N
CE 1.3. Site-Specific Studies and Unmapped ESHAs	Y	Y	NA
CE 1.5 Corrections to Map of ESHAs	N	N	N
CE 1.6. Protection of ESHAs.	Y	Y	Y
CE 1.9 Standards Applicable to Development Projects	N	N	N
CE 2.2 Streamside Protection Areas	Y	Y	Y
CE 2.3. Allowable Uses and Activities in Streamside Protection Areas	Y	Y	Y
CE 2.5. Maintenance of Creeks as Natural Drainage Systems	N	N	N
CE 3.1. Definition of Wetlands	N	N	N
CE 3.4. Protection of Wetlands in the Coastal Zone	Y	Y	Y
CE 3.5. Protection of Wetlands Outside the Coastal Zone	Y	Y	Y
CE 4.5. Buffers Adjacent to Monarch Butterfly ESHAs	Y	Y	N
CE 4.6. Standards Applicable to New Development Adjacent to Monarch ESHAs	Y	Y	N
CE 5.1. Designation of ESHAs	Y	Y	N
CE 5.3. Protection of Coastal Sage Scrub and Chaparral	Y	Y	N
CE 8.1. ESHA Designation	Y	Y	Y
CE 8.2. Protection of Habitat Areas	N	N	N
CE 8.4. Buffer Areas for Raptor Species	N	Y	N
CE 9.1. Definition of Protected Trees	N	N	N
CE 9.3. Native Oak Woodlands or Savannas	N	N	N
CE 9.4. Tree Protection Standards	N	N	N
CE 9.5. Mitigation of Impacts to Native Trees	N	N	N
CE 10.3, Incorporation of Best Management Practices for Stormwater Mgmt	N	N	N
CE-IA-4. Preparation of a Tree Protection Ordinance.	NA	NA	NA
CE Page 4 2 (text revision)	NA	NA	NA
CE Figure 4-1 (ESHA Map)	NA	NA	NA
CE Table 4-2 (ESHA Table)	NA	NA	NA
OS 7.3. Open Space for Preservation of Natural Resources	Y	Y	NA

Codes
Bold = change to a policy cited as mitigation in Final EIR
Y = Change has potential to result in a significant impact
N = No significant impacts identified with change
NA = Not Applicable (no change or change is not to a policy)

TABLE 3.4-7
POTENTIALLY SIGNIFICANT IMPACTS ASSOCIATED WITH PROPOSED AMENDMENTS

Potentially Significant Impact	Proposed Amendment with Potentially Significant Impact		
	Alt 2a	Alt 2b	Alt 3
Certain biological resources potentially would receive less protection and therefore would be more at risk than under the existing sub-policy. The change has the potential to increase the impacts to special status species and habitats under the GP/CLUP.	CE 1.2 CE 1.3 CE 5.1 OS 7.3	CE 1.2 CE 5.1 CE 8.4 OS 7.3	CE 1.6 CE 8.1
More types of activities potentially could occur in and near designated ESHAs and the total amount of ESHA affected might be greater than under the existing sub-policy. The change has the potential to increase the impacts to special status species and habitats under the GP/CLUP.	CE 1.6 CE 2.3	CE 2.3	CE 2.3
Creeks where the minimum buffer would have been 100 feet potentially would be at greater risk of impacts from adjacent activities than under the existing sub-policy. The change has the potential to increase the impacts to special status species and habitats under the GP/CLUP.	CE 2.2	CE 2.2	CE 2.2
Some wetlands potentially would have smaller buffers and hence potentially at greater risk of impacts from adjacent uses than under the existing sub-policy. The change has the potential to increase the impacts to special status species and a regulated resource (wetlands).	CE 3.4 CE 3.5	CE 3.4 CE 3.5	CE 3.4 CE 3.5
Because the details of the plan/manual are not known, it is not possible to determine if the provisions of the habitat management plan would provide protections at least equal to those under the existing sub-policy. Certain resources potentially would be at greater risk than under the existing GP/CLUP. The approach also potentially defers mitigation.	CE 4.5 CE 4.6 CE 5.3	CE 1.3 CE 1.6 CE 2.2 CE 3.4 CE 3.5 CE 4.5 CE 4.6 CE 5.3 CE 8.1	
Certain habitats that could but currently do not support special status species would receive less protection and therefore potentially would be more at risk than under the existing sub-policy. There potentially would be fewer benefits to special status species than under the existing GP/CLUP policies. The change has the potential to reduce the total amount of available to listed and other special status species under the GP/CLUP.	CE 8.1	CE 8.1	CE 8.1

TABLE 3.4-8
FACTORS THAT REDUCE POTENTIALLY SIGNIFICANT IMPACTS ASSOCIATED WITH PROPOSED AMENDMENTS

Proposed Amendment with Potential for Significant Impacts	Factors that Reduce the Level of Significance		
	Alternative 2a	Alternative 2b	Alternative 3
CE 1.2. Designation of Environmentally Sensitive Habitat Areas	The change does not alter the protection of designated ESHAs or project-level review and mitigation requirements. Fewer areas might be designated as ESHAs, the type of resources potentially qualifying as ESHAs would stay the same.	The change does not alter the protection of designated ESHAs or project-level review and mitigation requirements. Fewer areas might be designated as ESHAs, the type of resources potentially qualifying as ESHAs would stay the same.	The change does not alter the protection of designated ESHAs or project-level review and mitigation requirements. Fewer areas might be designated as ESHAs, the type of resources potentially qualifying as ESHAs would stay the same.
CE 1.3. Site-Specific Studies and Unmapped ESHAs	Same as for CE 1.2	Subsequent CEQA review would be required of the details of the habitat management plan. The problem of the change constituting deferred mitigation could be addressed by maintaining the existing sub-policy until the plan is adopted by the City.	NA
CE 1.6. Protection of ESHAs	The change potentially allows more activities but does not alter project-level review and mitigation requirements. The change also makes the sub-policy consistent with other CE sub-policies that allow mitigation for impacts to ESHAs (and hence allow activities precluded under the existing sub-policy).	Same as for CE 1.3	The change potentially allows more activities but does not alter project-level review and mitigation requirements. The change also makes the sub-policy consistent with other CE sub-policies that allow mitigation for impacts to ESHAs (and hence allow activities precluded under the existing sub-policy).
CE 2.2 Streamside Protection Areas	The change proposes a different minimum width buffer but does not eliminate the requirement for an upland buffer as part of the SPA. Some areas that would no longer be part of the mandated SPA buffer would likely be protected under other CE policies that require protection of ESHAs and buffers around ESHAs (including wetlands. Several of the creeks in the City have various non-riparian ESHA types within 50 feet of the riparian along the creek (e.g., butterfly roost buffers.) See note 1. Also see "Additional Information" following this table.	Same as for CE 1.3 See note 2. Also see "Additional Information" following this table.	The change proposes a different minimum width buffer but does not eliminate the requirement for an upland buffer as part of the SPA. Some areas that would no longer be part of the mandated SPA buffer would likely be protected under other CE policies that require protection of ESHAs and buffers around ESHAs (including wetlands. Several of the creeks in the City have various non-riparian ESHA types within 50 feet of the riparian along the creek (e.g., butterfly roost buffers). See note 3. Also see "Additional Information" following this table.

(continued on next page)

TABLE 3.4-8 CONTINUED

Proposed Amendment with Potential for Significant Impacts	Factors that Reduce the Level of Significance		
	Alternative 2a	Alternative 2b	Alternative 3
CE 2.3. Allowable Uses and Activities in Streamside Protection Areas	Same as for CE 1.6	The change potentially allows more activities but does not alter project-level review and mitigation requirements. The change also makes the sub-policy consistent with other CE sub-policies that allow mitigation for impacts to ESHAs (and hence allow activities precluded under the existing sub-policy).	Same as for CE 1.6
CE 3.4. Protection of Wetlands in the Coastal Zone	Same as for CE 2.2.	Same as for CE 1.3	Same as for CE 2.2
CE 3.5. Protection of Wetlands Outside the Coastal Zone	Same as for CE 2.2	Same as for CE 1.3	Same as for CE 2.2
CE 4.5. Buffers Adjacent to Monarch Butterfly ESHAs	Subsequent CEQA review would be required of the details of the habitat management plan. The problem of the change constituting deferred mitigation could be addressed by maintaining the existing sub-policy until the plan is adopted by the City.	Same as for CE 1.3	NA
CE 4.6. Standards Applicable to New Development Adjacent to Monarch ESHAs	Same as for CE 4.5	Same as for CE 1.3	NA
CE 5.1. Designation of ESHAs	Same as for CE 1.2	Same as for CE 1.2	NA
CE 5.3. Protection of Coastal Sage Scrub and Chaparral	Same as for CE 4.5	Same as for CE 1.3	NA
CE 8.1. ESHA Designation	Same as for CE 1.2. Also, some potential habitat would be conserved for special status species in ESHAs and buffers designated under other CE sub-policies. In addition, the reduction in benefits to special status species from not conserving potential habitat would not constitute a significant adverse impact per se under CEQA.	Same as for CE 1.2. Also, some potential habitat would be conserved for special status species in ESHAs and buffers designated under other CE sub-policies. In addition, the reduction in benefits to special status species from not conserving potential habitat would not constitute a significant adverse impact per se under CEQA.	Same as for CE 1.2. Also, some potential habitat would be conserved for special status species in ESHAs and buffers designated under other CE sub-policies. In addition, the reduction in benefits to special status species from not conserving potential habitat would not constitute a significant adverse impact per se under CEQA.
CE 8.4. Buffer Areas for Raptor Species	Same as for CE 8.1. Also, conservation of potential but not occupied habitat or nest sites would not constitute adequate mitigation for impacts to raptors (conserving occupied habitat and active nest sites would). Raptors also would remain protected under federal and state law.	Same as for CE 8.1. Also, conservation of potential but not occupied habitat or nest sites would not constitute adequate mitigation for impacts to raptors (conserving occupied habitat and active nest sites would). Raptors also would remain protected under federal and state law.	NA
OS 7.3. Open Space for Preservation of Natural Resources	Same as for CE 1.2	Same as for CE 1.2	NA

Notes:

1. Alternative 2a proposes a change that applies the same standard to developed and non-developed areas; 50 feet would be the minimum width of the upland portion of the SPA. The alternative does not impose any restriction on the maximum width of the SPA; does not change restrictions on allowable uses or development standards within the SPA or designated ESHAs and ESHA buffers under the existing GP/CLUP; and does not exempt projects from site-specific assessments and determinations in accordance with the GP/CLUP and applicable federal and state regulations. The results of the change are not substantially greater or different than determined in the Final EIR for the existing GP/CLUP; no unmitigated significant impacts would result.
2. Alternative 2b proposes that the mandated widths of the SPA be specified in a Citywide Ordinance rather than in the GP/CLUP. The mitigating factors will be clarified in the Final SEIR to indicate that adoption of such an ordinance is subject to CEQA review, which would address potential effects of special status species and habitats. It is recommended that an interim ordinance, consistent with the current adopted General Plan, be adopted as part of the approval of Alternative 2b (if this alternative is selected) to address creek setback issues as an interim measure that would remain in effect until the final Citywide Ordinance is finalized.
3. Alternative 3 differs from Alternative 2a in that it proposes a further clarification of the upland portion of the SPA. Alterative 2b also proposes wording to provide for case-by-case evaluations of the overall SPA. The factors and changes to the SEIR identified for Alternative 2a in note 1 above would essentially be the same for Alternative 3.

Additional Information

To provide an indication of where the conservation of ESHAs and ESHA buffers could augment the protections of a 50-foot SPA, ESHA and other cover types within 50 and 100 feet of creeks in the City were identified based on the GIS files used to create Figure 4-1 in the existing GP/CLUP. The 50- and 100-foot areas were measured from the edge of the riparian/wetland vegetation mapped along the creek; only nonchannelized portions of creeks were considered. The results indicate that other ESHA types occur within 50 and 100 feet of the riparian edge of at least 8 of the 12 creeks in the City. Along these creeks, there are approximately 13 acres of other ESHA types within 50 feet and approximately 28 acres within 100 feet of the riparian/wetland edges (Table 3.4-9). Where there are not other ESHA types, the lands within 100 and 50 feet are primarily developed, disturbed/landscaped, orchards/crops, and small amounts of nonnative grassland. The protection of SPAs in a natural state along these creek segments would not be augmented by the occurrence of other ESHA types. However, under the existing policy and alternatives, the determination of whether the SPA is being adequately protected in a natural state would be made based on site specific considerations, regardless of whether or not other ESHAs occur within 100 or 50 feet.

To quantify the difference in the resulting SPAs under Alternatives 1, 2a, and 3, two scenarios were examined using vacant parcels adjacent to creeks as the basis for the analysis. To approximate SPAs under the existing GP/CLUP, areas on vacant parcels within 100 feet of the riparian/wetland edge of creeks were mapped and categorized by land cover type using the GIS database for Figure 4-1 in the GP/CLUP. No adjustments were made where parcels were in developed areas and a 50-foot SPA (or narrower) would apply under the existing policy. The second scenario approximates the SPAs under Alternatives 2a and 3 by considering areas on vacant parcels within 50 feet of the riparian edge. No assumptions were made about site-specific conditions that would require a wider SPA, and no adjustments were made where a narrower SPA might be allowed. The results indicate that:

1. There are 12 vacant parcels within 100 or 50 feet of the riparian edge of creeks in the City (Figure 3.4-3). Six parcels would qualify for the 50-foot or narrower minimum SPA under the existing policy because of the level of adjacent development.
2. If a 100-foot setback were applied to all 12 parcels, approximately 7 acres of upland vegetation would be captured in the SPAs, primarily nonnative grasslands. Most of the land within 100 feet is developed, disturbed/landscaped, or orchards/crops.

3. If a 50-foot setback is applied to all 12 parcels, about 4 acres of upland vegetation would be the SPAs, primarily nonnative grassland.
4. There is less than a 4-acre difference in the amount of upland vegetation captured by a 100- versus a 50-foot setback. If ESHAs are removed from the equation (since they would be conserved whether in or out of an SPA), the primary difference between the two buffers is about 3 acres of nonnative grassland. See Table 3.4-10.
5. While it is not a substitute for the site-specific considerations required when setting the width of the actual SPA for a parcel, the parcel-level evaluation herein supports the conclusions in the Draft SEIR regarding potential impacts to special-status species and habitats from the changes proposed under Alternatives 2a and 3. There is not a substantially greater risk to such resources under Alternatives 2a and 3 than under the existing policy because such resources would be limited within 100 or 50 feet of the creek, would be identified in the site-specific considerations for SPAs, and would be protected under ESHA provisions whether designated part of the SPA or not. Under the existing policy and Alternatives 2a and 3, the adequacy of the buffer to protect the SPA in a natural state would be determined on a site-specific basis, not by applying the minimum width allowed under CE 2.2. As a result, the effects of the alternatives are essentially the same.

TABLE 3.4-9
ESHA AND OTHER LAND COVER TYPES WITHIN 50 AND 100 FEET OF THE RIPARIAN/WETLAND EDGE OF CREEKS IN THE CITY[1]

Land Cover Type	Acres within 50 ft of Creek	Acres within 100 ft of Creek
Developed	59.6	129.7
Disturbed/Landscaped	11.0	18.0
Eucalyptus Woodland	7.3	15.5
Golf Course	5.1	10.0
Native Grassland	0.2	0.4
Native Upland Woodland/Savannah	1.5	2.5
Nonnative Grassland	10.1	20.7
Open Water	0.2	0.5
Orchards/Crops	9.0	18.8
Riparian/Marsh/Vernal[2]	1.2	4.0
Sand	0.2	0.4
Scrub	1.7	4.0
Unvegetated Open Channel	0.3	0.9
Total	107.4	225.4

Notes

1 Estimated and mapped based on GIS-database for Figure 4-1 in the existing GP/CLUP.

2 Riparian/Marsh/Vernal excludes riparian/wetland types along the edge of creek; limited to areas not connected to the riparian/wetland vegetation along the creek.

TABLE 3.4-10
LAND COVER TYPES ON PORTIONS OF VACANT PARCELS WITHIN 100 AND 50 FEET OF CREEKS[1]

	Acres on Vacant Parcels		
Land Cover Type	**Within 100 ft of Creek**	**Within 50 feet of Creek**	**Difference**
Developed	0.753	0.599	0.154
Disturbed/Landscaped	8.500	4.000	4.500
Eucalyptus Woodland	0.867	0.552	0.315
Golf Course	0	0	0
Native Grassland	0	0	0
Nonnative Grassland	6.367	3.177	3.190
Open Water	0	0	0
Orchards/Crops	3.281	1.522	1.759
Riparian/Marsh/Vernal[2]	0.114	0.049	0.065
Sand	0	0	0
Scrub	0	0	0
Unvegetated Open Channel	0	0	0
Total	19.882	9.899	9.983

Notes

1 Estimated and mapped based on GIS-database for Figure 4-1 in the existing GP/CLUP with overlay of vacant parcels.

2 Riparian/Marsh/Vernal excludes riparian/wetland types along the edge of creek; limited to areas not connected to the riparian/wetland vegetation along the creek.

Program-level Analysis

The following analysis examines the potential impacts to biological resources associated with implementation of the GP/CLUP as amended under Alternatives 2a, 2b, and 3 and as compared with those associated with Alternative 1 (the existing GP/CLUP).

Class I Impacts—None

Alternative 1: No Changes (No Project). As indicated in the 2006 Final EIR, there are no short- or long-term significant and unavoidable impacts to biological resources associated with implementation of the City's adopted GP/CLUP.

Alternative 2a: City-Initiated Revisions. The proposed changes would not substantially alter the location or type of expected development and related activities within the City or remove the key protections that apply to special status habitat and species under City policies or State and Federal regulations. No class I impacts to biological resources are associated with Alternative 2a.

Alternative 2b: Options Associated with City-Initiated Revisions. For the same reasons that apply to Alternative 2a, no class I impacts to biological resources are associated with Alternative 2b.

Alternative 3: SEIR Recommended Revisions. For the same reasons that apply to Alternative 2a, no class I impacts to biological resources are associated with Alternative 3.

Class II Impacts

Short-Term Impacts

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

Alternative 1: No Changes (No Project). As indicated in the 2006 Final EIR, development of vacant sites and the construction and maintenance of roads, trails, parks, and public facilities have the potential to temporarily remove or degrade special status habitats and to have temporary adverse impacts on species status species (*Final EIR Impact 3.4-1*). Although temporary, such impacts are potentially significant when they affect regulated habitats (riparian and wetlands), habitats occupied by listed species, habitats with nesting birds, and special status habitats that occur only in small isolated patches (e.g., native grassland).

The following policies in the existing GP/CLUP reduce the potentially significant impacts of temporary habitat loss and modification by requiring impact avoidance where feasible, setting design criteria and management guidelines, and requiring mitigation for impacts to special status habitats (**bold** indicates policies proposed for change under Alternative 2a, 2b, or 3):

- **Policy CE 1: Environmentally Sensitive Habitat Area Designations and Policy**
- **Policy CE 2: Protection of Creeks and Riparian Areas**
- **Policy CE 3: Protection of Wetlands**
- **Policy CE 4: Protection of Monarch Butterfly Habitat Areas**
- **Policy CE 5: Protection of Other Terrestrial Habitat Areas**
- Policy CE 6: Protection of Marine Habitat Areas
- Policy CE 7: Protection of Beach and Shoreline Habitats
- **Policy CE 8: Protection of Special-Status Species**
- **Policy CE 9: Protection of Native Woodlands**
- **Policy CE 10: Watershed Management and Water Quality**
- Policy OS 1: Lateral Shoreline Access
- Policy OS 2: Vertical Access to the Shoreline
- Policy OS 3: Coastal Access Routes, Parking, and Signage
- Policy OS 4: Trails and Bikeways
- Policy OS 5: Ellwood-Devereux Open Space Area
- Policy OS 6: Public Park System Plan
- **Policy OS 7: Adoption of Open Space Plan Map**
- Policy LU 1: Land Use Plan Map and General Policies
- Policy LU 6: Park and Open Space Uses
- Policy LU 9: Coastal-Dependent and -Related Uses (Key Pacific Shoreline Sites)

Alternative 2a: City-Initiated Revisions. Alternative 2a has the same potential for short-term significant adverse impacts to special status habitats and species as the existing GP/CLUP (Alternative 1) and would reduce those impacts through policies that are substantially the same as those is the existing GP/CLUP. Because Alternative 2a includes policy changes that would reduce the minimum width of certain buffers and provide a more detailed list of allowed activities

in and near ESHAs, it can be viewed as having a greater potential for temporary short-term impacts than Alternative 1, especially in terms of temporary habitat disturbance or degradation from adjacent activities. Further, because Alternative 2a changes the how ESHAs are formally designated within the City, it is possible that the number of acres and types of ESHA protected from temporary impacts would be fewer than under Alternative 1 and consequently more acres and types would be subject to short-term impacts. However, none of the policy changes under Alternative 2a would amend the GP/CLUP in ways that eliminate or substantially change the requirements to avoid, minimize, and mitigate potentially significant impacts to special status biological resources. In addition, none of policy changes under Alternative 2a alter the resource protection and impact mitigation requirements that apply to special status habitats and species under federal and state regulations, including CEQA.

Alternative 2b: Options Associated with City-Initiated Revisions. Alternative 2b has substantially the same potential for short-term class II impacts as Alternative 2a. Alternative 2b differs from Alternative 1 and 2a in that it calls for the City to replace the measures included in ESHA-related policies in the existing GP/CLUP with a comprehensive habitat management plan and comprehensive guidelines for biological assessments and ESHA determinations within the City. Because Alternative 2b defers to a plan and guidelines not yet developed, it creates an interim scenario in which special status habitat and species are potentially more at risk from short-term impacts than would occur under Alternative 1 or 2a. However, as with Alternative 2a, none of policy changes under Alternative 2b would eliminate or substantially change the City policies or applicable federal and state regulations that apply to the protection of special status habitats and species.

Alternative 3: SEIR Recommended Revisions. Alternative 3 has the same potential for short-term significant adverse impacts to special status habitats and species as the existing GP/CLUP (Alternative 1) and would reduce those impacts through policies that are substantially the same as those is the existing GP/CLUP. Because Alternative 3 includes policy changes that provide a more detailed list of allowed activities in and near ESHAs and also reduces the minimum width of buffers, it can be viewed as having a greater potential for temporary short-term impacts than Alternative 1, especially in terms of temporary habitat disturbance or degradation from adjacent activities. Alternative 3 also includes policy changes which remove the exterior noise level limit, but still requires that noise impacts to special status species in adjacent ESHAs be minimized. As with Alternative 2a, the policy changes under Alternative 3 would not eliminate or change requirements under other City policies and under federal and state regulations regarding mitigation for significant impacts to special status biological resources.

Long-Term Impacts

Impact 3.4-2. Loss of Special Status Habitats

Alternative 1: No Changes (No Project). As indicated in the Final EIR, development of vacant sites and the construction and maintenance of roads, trails, parks, and public facilities entail activities that would permanently remove some existing special status habitats (*Final EIR Impact 3.4-2)*. Based on the habitat mapping depicted in Figure 3.4-2, the vacant sites identified in the existing GP/CLUP include approximately 40 acres of ESHA. Most of the ESHAs on or near vacant sites are located near creeks or existing preserves. The actual ESHA impacts of each development would be calculated as part of the planning process and CEQA documentation for individual projects. Although the GP/CLUP policies require impact avoidance and restrict development in ESHA areas, exceptions are allowed. Some loss of existing special status habitats would occur as a result of site development, and such losses are potentially significant.

Proposed roads, trails, parks, and public facilities are planned mainly for areas outside of ESHAs. However, the GP/CLUP explicitly allows for the inclusion of trails and some roads in ESHAs and ESHA buffers. Plans for the proposed facilities are not at a stage where impacts to ESHAs can be calculated with reasonable certainty. Actual ESHA impacts will be calculated as part of the planning process and CEQA documentation for individual projects. Some loss of existing special status habitats would occur as a result of road, trail, park, and other public facility construction, and such losses are potentially significant.

Maintenance of existing and future facilities (roads, trails, parks, other facilities) will occur in areas with ESHAs and in ESHA buffers. Actual ESHA impacts will depend on the type, timing, and location of the maintenance and management activities. A limited amount permanent habitat loss may result from some maintenance activities, and such losses are potentially significant.

The following policies in the existing GP/CLUP reduce the potentially significant impacts of permanent loss of existing habitat by requiring impact avoidance where feasible, setting design criteria and management guidelines, and requiring that any allowed impacts to special status habitats be fully mitigated (bold indicates policies proposed for change under Alternative 2a, 2b, or 3):

- **Policy CE 1: Environmentally Sensitive Habitat Area Designations and Policy**
- **Policy CE 2: Protection of Creeks and Riparian Areas**
- **Policy CE 3: Protection of Wetlands**
- **Policy CE 4: Protection of Monarch Butterfly Habitat Areas**
- **Policy CE 5: Protection of Other Terrestrial Habitat Areas**
- Policy CE 6: Protection of Marine Habitat Areas
- Policy CE 7: Protection of Beach and Shoreline Habitats
- **Policy CE 9: Protection of Native Woodlands**
- **Policy CE 10: Watershed Management and Water Quality**
- Policy OS 1: Lateral Shoreline Access
- Policy OS 2: Vertical Access to the Shoreline
- Policy OS 3: Coastal Access Routes, Parking, and Signage
- Policy OS 4: Trails and Bikeways
- Policy OS 5: Ellwood-Devereux Open Space Area
- Policy OS 6: Public Park System Plan
- **Policy OS 7: Adoption of Open Space Plan Map**
- Policy LU 1: Land Use Plan Map and General Policies
- Policy LU 6: Park and Open Space Uses
- Policy LU 9: Coastal-Dependent and -Related Uses (Key Pacific Shoreline Sites)

Alternative 2a: City-Initiated Revisions. Alternative 2a has the potential to result in permanent loss of special status habitats. Further, because Alternative 2a changes the how ESHAs are formally designated within the City, it is possible that the number of acres and types of ESHA

permanently preserved in the City would be fewer than under Alternative 1 and consequently more acres and types potentially would be removed. However, none of the policy changes under Alternative 2a would amend the GP/CLUP in ways that eliminate or substantially change the requirements to avoid, minimize, and mitigate potentially significant impacts to special status biological resources as stated in other City policies. In addition, none of policy changes under Alternative 2a alter the resource protection and impact mitigation requirements that apply to special status habitats under federal and state regulations, including CEQA.

Alternative 2b: Options Associated with City-Initiated Revisions. Alternative 2b has substantially the same potential as Alternative 2a to result in loss of special status habitats. Alternative 2b differs from Alternative 1 and 2a in that it calls for the City to replace the measures included in ESHA-related policies in the existing GP/CLUP with a comprehensive habitat management plan and comprehensive guidelines for biological assessments and ESHA determinations within the City. Because Alternative 2b defers to a plan and guidelines not yet developed, it creates an interim scenario in which special status habitat and species are potentially more at risk of being altered or removed than would occur under Alternative 1 or 2a. However, as with Alternative 2a, none of policy changes under Alternative 2b would eliminate or substantially change the City policies or applicable federal and state regulations that apply to the protection of special status habitats.

Alternative 3: SEIR Recommended Revisions. Alternative 3 has the same potential to result in loss of special status habitats as the existing GP/CLUP (Alternative 1) and would reduce those impacts through policies that are substantially the same as those in the existing GP/CLUP. Because Alternative 3 includes policy changes that provide a more detailed list of allowed activities in ESHAs and those activities may entail habitat removal, it can be viewed as having a greater potential for habitat loss than Alternative 1. Alternative 3 also proposes reducing the minimum width of buffers surrounding SPAs which may reduce the amount of SPA habitat preserved. However, as with Alternative 2a, the policy changes under Alternative 3 would not eliminate or change requirements under other City policies and under federal and state regulations regarding mitigation for significant impacts to special status biological resources.

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

Alternative 1: No Changes (No Project). As indicated in the Final EIR, development of vacant sites and the construction and maintenance of roads, trails, parks, and public facilities entail activities that could result in the long-term degradation of special status habitat (*Final EIR Impact 4.3-3*). Examples include increased occurrence of invasive nonnative species within special-status habitats due to the proximity of such nonnative species in adjacent landscaping, changes in hydrology and water flow that would degrade the quality and function of riparian systems, or habitat disturbances from unauthorized recreation activities. Because of the relatively small size and fragmented distribution of the ESHAs in the City, degradation of habitat conditions has the potential to result in permanent habitat loss as well as impaired habitat functions. Such impacts are potentially significant.

The following policies in the existing GP/CLUP reduce the potentially significant impacts of activities that directly or indirectly result in habitat degradation by requiring buffers and setbacks separating ESHAs from adjacent uses, identifying standards for uses in and adjacent to ESHAs and ESHA buffers, and requiring that impacts to ESHA be fully mitigated (**bold** indicates policies proposed for change under Alternative 2a, 2b, or 3):

- **Policy CE 1: Environmentally Sensitive Habitat Area Designations and Policy**
- **Policy CE 2: Protection of Creeks and Riparian Areas**

- **Policy CE 3: Protection of Wetlands**
- **Policy CE 4: Protection of Monarch Butterfly Habitat Areas**
- **Policy CE 5: Protection of Other Terrestrial Habitat Areas**
- Policy CE 7: Protection of Beach and Shoreline Habitats
- **Policy CE 9: Protection of Native Woodlands**
- **Policy CE 10: Watershed Management and Water Quality**
- Policy OS 5: Ellwood-Devereux Open Space Area
- Policy LU 1: Land Use Plan Map and General Policies
- Policy LU 6: Park and Open Space Uses
- Policy LU 9: Coastal-Dependent and -Related Uses (Key Pacific Shoreline Sites)

Alternative 2a: City-Initiated Revisions. Because Alternative 2a includes policy changes that would reduce the minimum width of certain buffers and provide a more detailed list of allowed activities in and near ESHAs, it can be viewed as having a greater potential for long-term habitat degradation than Alternative 1, especially in terms of habitat disturbance or degradation from adjacent activities. Further, because Alternative 2a changes the how ESHAs are formally designated within the City, it is possible that the number of acres and types of ESHA protected from long-term impacts would be fewer than under Alternative 1 and consequently more acres and types would be subject to long-term degradation. However, none of the policy changes under Alternative 2a would amend the GP/CLUP in ways that eliminate or substantially change the requirements to avoid, minimize, and mitigate potentially significant impacts to special status biological resources as stated in other City policies. In addition, none of policy changes under Alternative 2a alter the resource protection and impact mitigation requirements that apply to special status habitats under federal and state regulations, including CEQA.

Alternative 2b: Options Associated with City-Initiated Revisions. Alternative 2b has substantially the same potential for long-term habitat degradation as Alternative 2a. Alternative 2b differs from Alternative 1 and 2a in that it calls for the City to replace the measures included in ESHA-related policies in the existing GP/CLUP with a comprehensive habitat management plan and comprehensive guidelines for biological assessments and ESHA determinations within the City. The plan and guidelines potentially provide ways to prevent and remedy habitat degradation in a more systematic and hence potentially more effective way than under Alternative 1 or 2a.

Alternative 3: SEIR Recommended Revisions. Alternative 3 has the same potential for long-term habitat degradation as the existing GP/CLUP (Alternative 1) and would reduce those impacts through policies that are substantially the same as those is the existing GP/CLUP. Because Alternative 3 includes policy changes that provide a more detailed list of allowed activities in and near ESHAs and reduces the minimum buffer width in SPAs, it can be viewed as having a greater potential for long-term habitat degradation than Alternative 1. Alternative 3 also revises the policy regarding exterior noise level limits for development near ESHAs which could increase long-term degradation of special status habitats. However, as with Alternative 2a, the policy changes under Alternative 3 would not eliminate or change requirements under other City policies and under federal and state regulations regarding mitigation for significant impacts to special status biological resources and noise levels adjacent ESHAs would still be required to be minimized.

Impact 3.4-4. Fragmentation of Special Status Habitats

Alternative 1: No Changes (No Project). As indicated in the Final EIR, development of vacant sites and the construction (but not the maintenance) of roads, trails, parks, and public facilities entail activities that could result in the fragmentation of existing areas of special status habitats, especially in riparian corridors (*Final EIR Impact 3.4-4*). Given the limited amount of ESHAs and the linear nature of the riparian areas, fragmentation of ESHAs has the potential to result in permanent habitat loss as well as permanently impaired habitat functions. Such effects are potentially significant. GP/CLUP policies that reduce the impact are the same as those for *Final EIR Impact 3.4-2* and *3.4-3.*

Alternative 2a: City-Initiated Revisions. Because Alternative 2a changes the how ESHAs are formally designated within the City, it is possible that the number of acres and types of special status habitat preserved and protected from impacts would be fewer than under Alternative 1 and consequently more acres, types, and locations would be subject to fragmentation. However, none of the policy changes under Alternative 2a would amend the GP/CLUP in ways that eliminate or substantially change the requirements to avoid, minimize, and mitigate potentially significant impacts to special status biological resources as stated in other City policies. In addition, none of policy changes under Alternative 2a alter the resource protection and impact mitigation requirements that apply to special status habitats under federal and state regulations, including CEQA.

Alternative 2b: Options Associated with City-Initiated Revisions. Alternative 2b has substantially the same potential for habitat fragmentation as Alternative 2a. Alternative 2b differs from Alternative 1 and 2a in that it calls for the City to replace the measures included in ESHA-related policies in the existing GP/CLUP with a comprehensive habitat management plan and comprehensive guidelines for biological assessments and ESHA determinations within the City. The plan and guidelines potentially provide ways to prevent and remedy habitat fragmentation in a more systematic and hence potentially more effective way than under Alternative 1 or 2a.

Alternative 3: SEIR Recommended Revisions. Alternative 3 has the same potential for habitat fragmentation as the existing GP/CLUP (Alternative 1) and would reduce those impacts through policies that are substantially the same as those is the existing GP/CLUP. Because Alternative 3 includes policy changes that provide a more detailed list of allowed activities in and near ESHAs and reduces the minimum width of buffers surrounding SPAs, it can be viewed as having a greater potential for habitat fragmentation than Alternative 1. However, as with Alternative 2a, the policy changes under Alternative 3 would not eliminate or change requirements under other City policies and under federal and state regulations regarding mitigation for significant impacts to special status biological resources.

Impact 3.4-5. Harm to Listed Species

Alternative 1: No Changes (No Project). As indicated in the Final EIR, development of vacant sites and the construction and maintenance of roads, trails, parks, and public facilities entail activities that could result harm to listed species (*Final EIR Impact 3.4-5)*. Listed species that are known to occur or have the potential to occur in the City are identified in Table 3.4-2. The habitats of these species are subject to Federal and State regulations as well local ordinances and policies that are designed to protect the species from impacts, except as authorized under the Federal and State Endangered Species Acts. Impacts to listed species are reduced by GP/CLUP Policy CE 8: Protection of Special Status Species, and by the habitat-related policies identified for *Final EIR Impacts 3.4-1* and *3.4-2*. These policies provide for the protection of listed, proposed species, and non-listed special-status species. The protections are largely

habitat-based, which provides protection to listed and non-listed species in the same locations. Harm to any listed species would require authorization from USFWS, NMFS, and/or DFG as appropriate in accordance with the Federal and State Endangered Species Acts. Such authorization would be a condition of any City approval of any project that would result in harm to a listed species. In addition, Policy CE 8 applies to any species that fit the definitions of special status species.

Alternative 2a: City-Initiated Revisions. Because Alternative 2a changes the how ESHAs are formally designated within the City, it is possible that the number of acres and types of permanently preserved ESHAs occupied by listed species would be fewer than under Alternative 1. Consequently, the risk of harm to listed species that occur outside of permanent preserves could be viewed as potentially greater than under Alternative 1. However, none of policy changes under Alternative 2a would amend the GP/CLUP in ways that eliminate or substantially change the City, State, or Federal requirements to avoid, minimize, and mitigate impacts to listed species. The potential for harm to listed species would be essentially the same as under Alternative 1 and would be minimized and mitigated in the same way.

Alternative 2b: Options Associated with City-Initiated Revisions. The potential for Alternative 2b to result in harm is the same as under Alternative 2a and would be minimized and mitigated in the same way as under Alternative 2a and 1.

Alternative 3: SEIR Recommended Revisions. Alternative 3 has the same potential for harm to listed species as the existing GP/CLUP (Alternative 1) and would reduce those impacts through policies that are substantially the same as those is the existing GP/CLUP. Because Alternative 3 includes policy changes that provide a more detailed list of allowed activities in and near ESHAs and reduces the minimum width of buffers surrounding SPAs, it can be viewed as having a greater potential for harm than Alternative 1. Alternative 3 also revises the policy regarding exterior noise level limits for development near ESHAs which could increase the potential for harm to listed species. However, as with Alternative 2a, the policy changes under Alternative 3 would not eliminate or change requirements under other City policies and under federal and state regulations regarding mitigation for significant impacts to special status biological resources.

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

Alternative 1: No Changes (No Project). As indicated in the Final EIR, development of vacant sites and the construction (but not the maintenance) of roads, trails, parks, and public facilities entail activities that could result in the loss, reduction, or isolation of local populations of native species, primarily through habitat loss and degradation (*Final EIR Impact 3.4-6).* Such impacts are potentially significant, especially given the small size and scattered distribution of habitat for native species of plants, wildlife, and fish. Populations of endemic species such as vernal pool invertebrates and plants generally are at most risk. Most known areas of native grassland (the rarest native habitat in the City) are conserved within an existing reserve; a few areas exist on the residences at Sandpiper site and the Comstock Homes site. The impacts to local populations of native species are reduced to less-than-significant levels by the same GP/CLUP policies that reduce *Final EIR Impact 3.4-1, 3.4-2,* and *3.4-5*.

Alternative 2a: City-Initiated Revisions. Because Alternative 2a changes the how ESHAs are formally designated within the City, it is possible that the number of acres and types of ESHAs occupied by native species would be fewer than under Alternative 1. Further, some policy changes in Alternative 2 can be viewed as providing less protection to non-listed species than would occur under Alternative 1. Consequently, more non-listed native species would be at risk

under Alternative 2a than under Alternative 1. However, none of policy changes under Alternative 2a would amend the GP/CLUP in ways that eliminate or substantially change the City's conservation goals for native species or the priority given to native species conservation under local, state, and federal regulations and policies.

Alternative 2b: Options Associated with City-Initiated Revisions. The potential impacts and proposed mitigation for impacts on local populations of native species under Alternative 2b are essentially the same as that under Alternative 2a.

Alternative 3: SEIR Recommended Revisions. The potential impacts and proposed mitigation for impacts on local populations of native species under Alternative 2b are essentially the same as that under Alternative 1.

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

Alternative 1: No Changes (No Project). As indicated in the Final EIR, development of vacant sites and the construction and maintenance of roads, trails, parks, and public facilities entail activities that could reduce the amount and/or the quality of habitat for special status species (*Final EIR Impact 3.4-7)*. Species associated with grassland habitats (including nonnative grassland) and endemic species such as vernal pool plants and invertebrates are potentially most at risk from habitat reduction. Impacts are reduced to less-than-significant levels by the same GP/CLUP policies that reduce *Final EIR Impact 3.4-1, 3.4-2*, and *3.4-5*.

Alternative 2a: City-Initiated Revisions. Because Alternative 2a changes the how ESHAs are formally designated within the City, it is possible that the amount of habitat preserved and protected for special status species would be less than under Alternative 1. Further, some policy changes in Alternative 2a can be viewed as providing less protection to ESHAs than would occur under Alternative 1, potentially resulting in reduced habitat quality. However, none of policy changes under Alternative 2a would amend the GP/CLUP in ways that eliminate or substantially the requirements for project's to avoid, minimize, and mitigate impacts to the habitats of special status species.

Alternative 2b: Options Associated with City-Initiated Revisions. The potential impacts and proposed mitigation for impacts on habitat for special status species under Alternative 2b are essentially the same as that under Alternative 2a.

Alternative 3: SEIR Recommended Revisions. The potential impacts and proposed mitigation for impacts on local populations of native species under Alternative 3 is essentially the same as that under Alternative 1. Reducing the minimum buffer width near SPAs could potentially decrease the amount of habitat for special status species that use riparian areas for habitat. However, none of policy changes under Alternative 3 would amend the GP/CLUP in ways that eliminate or substantially the requirements for project's to avoid, minimize, and mitigate impacts to the habitats of special status species.

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

Alternative 1: No Changes (No Project). As indicated in the Final EIR, development of vacant sites and the construction (but not maintenance) of roads, trails, parks, and public facilities entail activities that could result in the break of an existing wildlife linkage or impairment of the linkage's function (*Final EIR Impact 3.4-8).* Riparian corridors, which also provide movement corridors to upland habitats, are most at risk because of the tenuous nature of existing linkages and impacts from existing surrounding development. Loss of a linkage or impairment of a linkage's function is a potentially significant impact. This impact is reduced to a less-than-

significant level by the same GP/CLUP policies that would reduce *Final EIR Impacts 3.4-2, 3.4-3,* and *3.4-4.*

Alternative 2a: City-Initiated Revisions. Because Alternative 2a changes the how ESHAs are formally designated within the City, it is possible that the number of acres and types of ESHAs preserved in the City – especially upland types such as grassland and sage scrub -- would be fewer than under Alternative 1. This difference has repercussions for the preservation of wildlife linkages, which often rely on a mosaic of upland as well as riparian types. However, none of the policy changes under Alternative 2a would amend the GP/CLUP in ways that eliminate or substantially change the requirements to avoid, minimize, and mitigate potentially significant impacts to special status resources, including linkages.

Alternative 2b: Options Associated with City-Initiated Revisions. Alternative 2b would have essentially the same impacts on wildlife linkages as Alternative 2a. As with the mitigation for long-term habitat degradation, the comprehensive plan and guidelines developed under Alternative 2b has substantially the same potential for long-term habitat degradation as Alternative 2a. Alternative 2b differs from Alternative 1 and 2a in that it calls for the City to replace the measures included in ESHA-related policies in the existing GP/CLUP with a comprehensive habitat management plan and comprehensive guidelines for biological assessments and ESHA determinations within the City. The plan and guidelines potentially provide ways to prevent and remedy habitat degradation in a more systematic and hence potentially more effective way than under Alternative 1 or 2a.

Alternative 3: SEIR Recommended Revisions. The potential impacts and proposed mitigation for impacts on local populations of native species under Alternative 3 is essentially the same as that under Alternative 1.

Impact 3.4-9. Loss or Degradation of Conserved Habitat

Alternative 1: No Changes (No Project). As indicated in the Final EIR, development of vacant sites and the construction and maintenance of roads, trails, parks, and public facilities entail activities could result in potentially significant impacts on biological resources in areas of conserved habitat (*Final EIR Impact 3.4-9*). These potential impacts are similar to those included in *FEIR Impacts 3.4-1* through *3.4-8*. Impacts to conserved habitat are reduced to a less-than-significant level by the same GP/CLUP policies that reduce *Impacts 3.4-1* through *3.4-8*.

Alternative 2a: City-Initiated Revisions. Because some policy changes in Alternative 2a can be viewed as providing less protection to ESHAs from adjacent uses than would occur under Alternative 1, it has the potential for greater impacts to existing conserved habitat than Alternative 1. However, none of policy changes under Alternative 2a would amend the GP/CLUP in ways that eliminate or substantially the requirements for projects to avoid, minimize, and mitigate impacts to already conserved areas.

Alternative 2b: Options Associated with City-Initiated Revisions. The potential impacts and proposed mitigation for impacts on conserved habitat under Alternative 2b are essentially the same as that under Alternative 2a.

Alternative 3: SEIR Recommended Revisions. The potential impacts and proposed mitigation for impacts on local populations of native species under Alternative 3 is essentially the same as that under Alternative 1.

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

Alternative 1: No Changes (No Project). As indicated in the Final EIR, development of vacant sites and the construction and maintenance of roads, trails, parks, and public facilities may entail proposed activities that are inconsistent with approved conservation programs and local conservation policies (*Final EIR Impact 3.4-10).* Such effects are reduced to a less-than-significant level by the same GP/CLUP policies that reduce *Final EIR Impacts 3.4-1* through *3.4-9*.

Alternative 2a: City-Initiated Revisions. The impacts and mitigation under this alternative would be essentially the same as under Alternative 1.

Alternative 2b: Options Associated with City-Initiated Revisions. The impacts and mitigation under this alternative would be essentially the same as under Alternative 1.

Alternative 3: SEIR Recommended Revisions. The impacts and mitigation under this alternative would be essentially the same as under Alternative 1.

Class III Impacts—None

Short-Term Impacts

Alternative 1: No Changes (No Project). As indicated in the 2006 Final EIR, there are no short-term Class III impacts to biological resources associated with implementation of the City's adopted GP/CLUP.

Alternative 2a: City-Initiated Revisions. Same as Alternative 1.

Alternative 2b: Options Associated with City-Initiated Revisions. Same as Alternative 1.

Alternative 3: SEIR Recommended Revisions. Same as Alternative 1.

Long-Term Impacts

Impact 3.4-11. Impacts to Non-Special-Status Habitats and Species

Alternative 1: No Changes (No Project). As indicated in the Final EIR, development of vacant sites and the construction and maintenance of roads, trails, parks, and public facilities entail activities could remove and degrade non-special–status habitats and adversely affect non-special–status species (*Final EIR Impact 3.4-10)*. However, these activities would not substantially alter the non-special–status resources. Such effects are not potentially significant and do not require mitigation.

Alternative 2a: City-Initiated Revisions. Because fewer area potentially would qualify as ESHAs under this alternative, it potentially would result in greater impacts to non-special--status resources than Alternative 1. Such effects are not potentially significant and do not require mitigation.

Alternative 2b: Options Associated with City-Initiated Revisions. The impacts under this alternative would be essentially the same as under Alternative 2a.

Alternative 3: SEIR Recommended Revisions. The impacts under this alternative would be essentially the same as under Alternative 1.

Class IV Impacts

Short-Term Impacts

Alternative 1: No Changes (No Project). As indicated in the 2006 Final EIR, there are no short-term Class IV impacts to biological resources associated with implementation of the City's adopted GP/CLUP.

Alternative 2a: City-Initiated Revisions. Same as Alternative 1.

Alternative 2b: Options Associated with City-Initiated Revisions. Same as Alternative 1.

Alternative 3: SEIR Recommended Revisions. Same as Alternative 1.

Long-Term Impacts

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

Under all four alternatives, maintenance/management of roads, trails, parks, and public facilities entail activities that would not fragment special status habitats or break existing wildlife linkages

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

Under all four alternatives, protection of ESHAs and maintenance/management of regional and neighborhood open space areas have the potential to benefit special status habitats and species by preserving lands with these resources, providing for their ongoing management, and maintaining linkages to other habitat areas. Management and protection of resources in the City's preserves (Lake Los Carneros Natural and Historical Preserve, Sperling Preserve, Santa Barbara Shores Park, and Coronado Preserve) have the potential to enhance the sustainability of the species and habitats on those sites and thereby could have long-term beneficial effects. However, the magnitude and duration of the beneficial effects of reserve management will depend on maintaining linkages to other habitat areas. Protection of ESHAs outside of preserves at a minimum will have short-term beneficial effects for the species and habitats in those locations.

3.4.3.4 Cumulative Impacts

Impact 3.4-14. Cumulative Impacts to Biological Resources

Alternative 1: No Changes (No Project). As indicated in the Final EIR, in addition to the development and related activities that will occur in the City, various projects are proposed for lands controlled by the City of Santa Barbara, County of Santa Barbara, and University of California (see Table 3-1). As in the City of Goleta, many of these projects will occur on vacant sites within already developed communities. However, some projects will be in or adjacent to areas with special status habitats and species and will have indirect as well as direct adverse effects on those resources. Individually and collectively, the projects in the surrounding area and GP/CLUP study area will contribute to:

- loss of natural open space;
- loss of special status habitats, including breeding habitat for special status species;
- degradation and fragmentation of upland and riparian habitats;
- loss of foraging habitat (grassland) for resident and migratory raptors;

- further degradation of water quality in Devereux Creek and Devereux Slough from increased pollutant runoff and sedimentation;
- loss and impairment of wildlife linkages;
- increased occurrence of nonnative and/or non-indigenous plants;
- increased potential for harm to listed species; and
- increased impacts to local populations of native species, including disruption of breeding due to increased disturbance from adjacent land uses.

While the cumulative effects of the combined projects are potentially significant, the cumulative effects attributable to projects in the City would be reduced to less-than-significant levels (Class III) in accordance with the GP/CLUP policies and applicable federal and state regulations.

The following GP/CLUP policies would further reduce project contributions to Impact 3.4-14 (**bold** indicates policies proposed for change under Alternative 2a, 2b, or 3).

- **Policy CE 10: Watershed Management and Water Quality**
- Policy OS 5: Ellwood-Devereux Open Space Area
- Policy LU 9: Coastal-Dependent and -Related Uses (Key Pacific Shoreline Sites)
- Policy LU 12: Land Use in Goleta's Environs

Alternative 2a: City-Initiated Revisions. The impacts and mitigation under this alternative would be essentially the same as under Alternative 1.

Alternative 2b: Options Associated with City-Initiated Revisions. The impacts and mitigation under this alternative would be essentially the same as under Alternative 1.

Alternative 3: SEIR Recommended Revisions. The impacts and mitigation under this alternative would be essentially the same as under Alternative 1.

In sum, the proposed amendments evaluated in this Supplemental EIR would not affect the level of significance of cumulative impacts determined for the 2006 Final EIR.

3.4.3.5 Mitigation

Modifications to Proposed GP/CLUP Policies
Proposed modifications to selected GP/CLUP policies are presented in Chapter 2.0 as amendments to the GP/CLUP. No further modifications are proposed for consideration beyond those identified as alternatives in this Supplemental EIR.

Other Mitigation
No additional mitigation is identified.

3.4.3.6 Residual Impacts

For all alternatives, the residual contribution to cumulative impacts to biological resources would be reduced to less-than-significant levels (Class III) through implementation of the biological resource protection policies described under GP/CLUP.

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