Final
Initial Study and
Mitigated Negative Declaration

Ellwood Mesa Coastal Trails
& Habitat Restoration Project

City Case # 13-039-CUP
14-MND-001

SCH #2014031069

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Acronyms

°F	Fahrenheit
ADT	Average Daily Traffic
ALUC	Airport Land Use Commission
ALUP	Airport Land Use Plan
APN	Assessor Parcel Numbers
B.P.	Before Present
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CALFIRE	California Department of Forestry and Fire Protection
CAP	Clean Air Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCC	California Coastal Commission
CCIC	Central Coastal Information Center
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CFR	Code of Federal Regulations
CH_4	methane
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
dBA	A-weighted decibels
DOGGR	California Division of Oil, Gas, and Geothermal Resources
EIR	Environmental Impact Report
ESH	Environmentally Sensitive Habitat
ESHA	Environmentally Sensitive Habitat Area
FEMA	Federal Emergency Management Agency
FPD	Fire Prevention Division
GHG	Greenhouse Gas
GP/CLUP	General Plan and Coastal Land Use Plan
GUSD	Goleta Union School District
GWSD	Goleta West Sanitary District
IS-MND	Initial Study-Mitigated Negative Declaration
lbs/day	pounds per day
LCP	Local Coastal Plan
Ldn	Day-Night Average Noise Level
Leq	Equivalent Noise Level
LOS	Level of Service
mgd	million gallons per day
MMT	million metric tons
mph	miles per hour
msl	mean sea level
MTD	Metropolitan Transit District
N_2O	nitrous oxide
NCDC	National Climatic Data Center
NFPA	National Fire Protection Association
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O_3	ozone
PAH	polynuclear aromatic hydrocarbon
PHD-EHS	Public Health Department - Environmental Health Services
PM_{10}	particulate matter less than ten microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
ROC	reactive organic compound
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SBCAG	Santa Barbara County Association of Governments
SBCAPCD	Santa Barbara County Air Pollution Control District
SBCFD	Santa Barbara County Fire Department
SBTC	Santa Barbara Trails Council
SBUSD	Santa Barbara Unified School District
SIP	State Implementation Plan
SO_2	sulfur dioxide
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TDML	Total Daily Maximum Loads
UCSB	University of California Santa Barbara
USACE	U.S. Army Corps of Engineers
USC	U.S. Code
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
V/C	Volume to Capacity

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ATTACHMENTS

CITY OF GOLETA
FINAL MITIGATED NEGATIVE DECLARATION
June 23, 2014

1. PROJECT TITLE:

Ellwood Mesa Coastal Trails and Habitat Restoration Project Request; City Case # 13-029-CUP

2. LEAD AGENCY NAME AND ADDRESS:

City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

3. CONTACT PERSON AND PHONE NUMBER:

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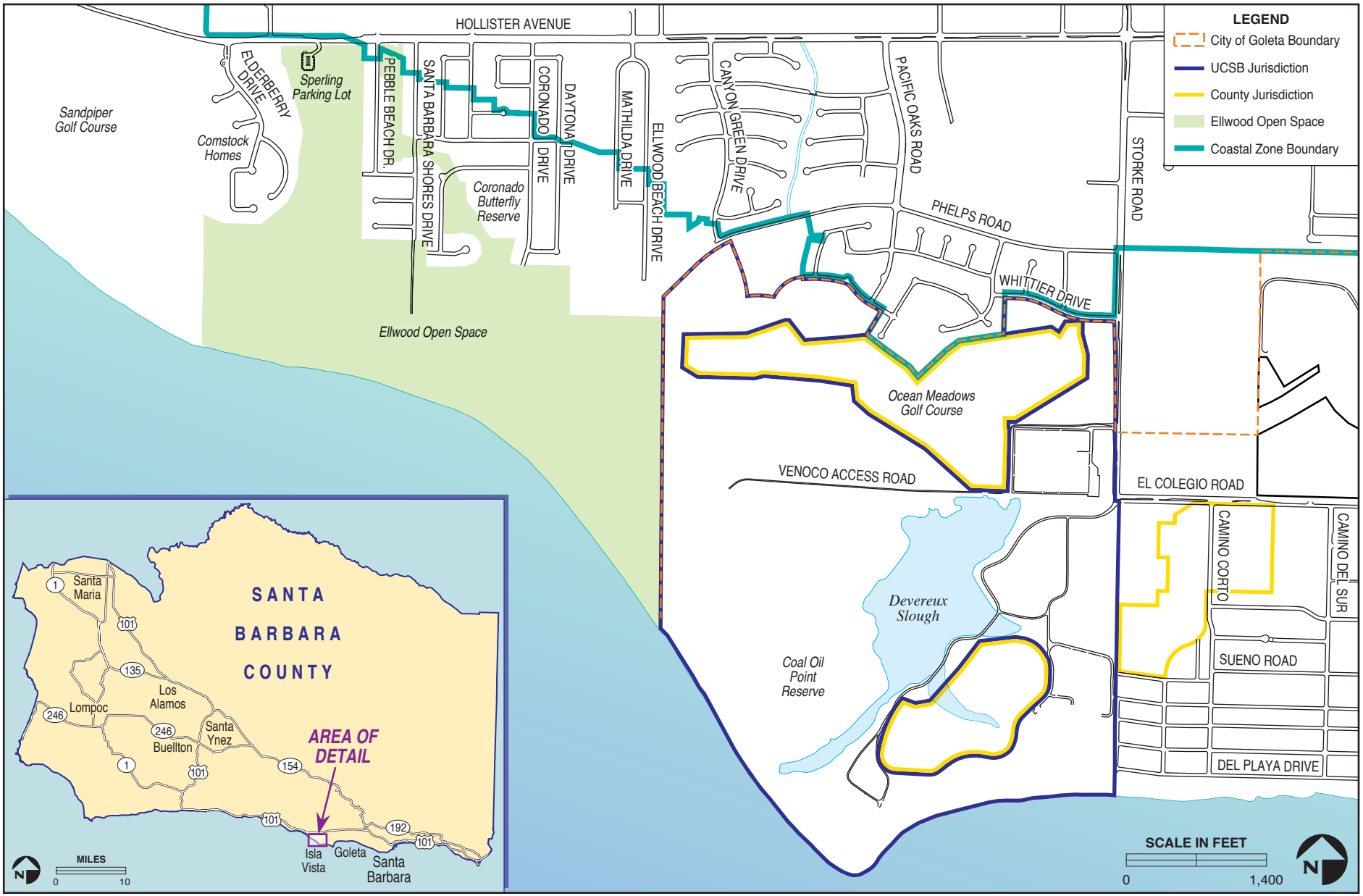
4. APPLICANT:

Santa Barbara Trails Council (SBTC)
3885 Cinco Amigos
Santa Barbara, CA 93105

5. PROJECT LOCATION:

The Project location is regionally known as the Ellwood Mesa Open Space Plan Area (Ellwood Mesa), an approximately 224-acre parcel located entirely within the City of Goleta's Coastal Zone and bordered by Hollister Avenue to the north, the Ellwood Shores neighborhood to the north and east, Venoco Ellwood Marine Terminal and Coal Oil Point Nature Reserve to the east, the Comstock Homes (The Bluffs) residential subdivision and Sandpiper Golf Course to the west, and the Pacific Ocean to the south (see Figure 1). The Project site contains Assessor Parcel Numbers (APN) 079-210-024, 079-210-069, 079-210-015, 079-210-014, 079-210-013, 079-210-072, 079-210-071, and 079-210-070.



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Ellwood Trails Vicinity Map

FIGURE 1

6. PROJECT DESCRIPTION:

The proposed Ellwood Mesa Coastal Trails and Habitat Restoration Project would enhance approximately 1.56 miles of existing trails by improving drainage and trail tread and restoring native habitats to reduce environmental impacts associated with the use of the existing California Coastal and Juan Bautista de Anza Trails on Ellwood Mesa. The proposed Project would also realign approximately 0.54 miles of trail in substantial conformance with the City of Goleta General Plan and Coastal Land Use Plan to enhance this trail system and include improvements to three drainage crossings and two beach access points.

The proposed Ellwood Mesa Coastal Trails and Habitat Restoration Project (Project) would improve approximately 2.1 miles of existing coastal trails on Ellwood Mesa. This would include improvements to 1.56 miles of existing trails as well as drainage improvements to direct surface flows off of trails and improvements in trail tread surface such as leveling and eliminating ruts or ridges within the trail. In addition, approximately 0.54 miles of trail would be realigned around sensitive areas in conformance with the City of Goleta General Plan and Coastal Land Use Plan (GP/CLUP) (see Figure 2). The proposed Project would also include improvements to three drainage crossings (i.e., Gully A, Drainage A, and Devereux Creek), and two existing beach access points (i.e., Beach Access Points E and F). Additionally, habitat restoration is proposed for approximately 13 acres adjacent to the trail and coastal blufftop as envisioned and planned for in the 2004 Ellwood-Devereux Coast Open Space and Habitat Management Plan (Open Space Plan).

Project Vicinity and Location

The Project area is bounded by Hollister Avenue to the north, the Ellwood Shores neighborhood to the north and east, the inactive Venoco Ellwood Marine Terminal and Coal Oil Point Nature Reserve to the east, the Comstock Homes (The Bluffs) residential subdivision and Sandpiper Golf Course to the west, and Ellwood Beach as well as the Pacific Ocean to the south. Hollister Avenue, a four-lane major arterial, runs in an east-west direction and provides access along its southern side to Sperling Parking Lot, a 40-space public trailhead parking lot at Ellwood Mesa, in close proximity to the Anza Trail, in the City of Goleta, California.

Trail Route Under the Proposed Project

The existing shared California Coastal (Coastal) Trail and Juan Bautista de Anza Trail (Anza Trail) begins at the Sperling Parking Lot, the public trailhead parking lot located along the southern side of Hollister Avenue. Under the proposed Project, the proposed improvements would occur along the existing shared trail until reaching the proposed realigned segment over Gully A and Drainage A. Following the crossing over Drainage A, the proposed realigned segment would reconnect with improvements occurring along the existing shared Coastal-Anza Trail heading south to the proposed crossing over Devereux Creek. The existing trail turns southeast along the bluff, where it would split into the existing Anza Trail and a proposed realigned segment of the Coastal Trail that would connect with the existing blufftop segment leading toward the University of California Santa Barbara's (UCSB's) Coal Oil Point Nature Reserve. Additionally, the existing Coastal Loop Route rounds the western end of Ellwood Mesa, adjacent to Sandpiper Golf Course, and continues along the blufftop connecting with the existing Coastal Trail at Beach Access Point F (see Figure 2).

Project Setting

Ellwood Mesa provides one of the largest contiguous open space areas along the South Coast and attracts thousands of visitors per year. The Ellwood Mesa Open Space Plan Area is characterized by coastal mesas and steep coastal bluffs bisected by Devereux. Eucalyptus (*Eucalyptus* spp.) woodlands form a dense canopy surrounding Devereux Creek, while salt marsh habitat parallels the margins of the slough. Coastal bluff, dune scrub, and foredune habitats dominate the coastal bluff, and native grassland, non-native annual grassland, and coyote brush (*Baccharis pilularis*) scrub dominate the habitats on the mesa. Additionally, vernal pools are abundant in topographic depressions on Ellwood Mesa. The Ellwood Mesa Open Space Plan Area also includes the Coronado Butterfly Preserve, which is surrounded by residential development, but is one of the largest monarch butterfly (*Danaus plexippus*) overwintering groves in California (see Figure 6).

The Coastal and Anza trails run between the Comstock Homes Development (The Bluffs) to the west and the eucalyptus grove to the east.

The proposed Project is located entirely within Ellwood Mesa, including 223.6 acres of the Open Space Plan Area that is within the City of Goleta's coastal zone jurisdictional boundary. Project parcels are zoned for Recreation (REC) pursuant to the City of Goleta's Coastal Zoning Ordinance and managed for Open Space/Passive Recreation.

Project Objectives

The existing Ellwood Mesa trail network, including the two existing Beach Access Points E and F, is impacted by erosional gullies and potholes resulting from past grading and continuous trail use with limited maintenance. Gullied sections of the trail have become a serious problem, resulting in steep grades, which often make the trail difficult to use. These grades present the biggest impediment to trail use at the drainage crossings and beach access points, where the grade can reach 14 and 50 percent respectively. Additionally, trail users often bypass wet and muddy sections of the existing trail during the winter months, creating trail braids, resulting in damage to sensitive habitat (e.g., vernal pools) and exacerbating trail and blufftop erosion.

"Braiding effect" on the existing Ellwood Mesa trail network due to user bypass of poorly drained surfaces.

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Proposed Trail Route

FIGURE 2

The proposed Project would implement the following four major objectives developed during community outreach:

1) Improve safe access across gullies and drainage crossings and reduce impacts to riparian habitats in those areas. This includes the engineered crossings (e.g., culverts or boardwalk bridges) over Gully A, Drainage A, and Devereux Creek;

2) Restore damaged portions of the existing Coastal and Anza trails, especially along the blufftop portions of the Coastal Trail;

3) Provide habitat restoration along the trail corridors and adjacent Environmentally Sensitive Habitat Areas (ESHAs); and,

4) Provide safer public access to the beach and improved drainage at Beach Access Points E and F.

Trail Construction Techniques

A number of different construction techniques would be used to implement the proposed Project improvements within the existing trail corridors and along the proposed trail realignments. The proposed improvements and realignments would incorporate natural materials, tones, and design techniques to the maximum extent feasible while addressing trail network accessibility standards.

Trail Corridor

The proposed Project would make improvements to the existing Coastal and Anza trails within a 20-foot wide corridor, within approximately ten feet from the centerline of the existing trails. This would provide flexibility in designing the trail improvements to avoid sensitive habitats, improve erosion control, and to allow for slight adjustments as needed in the future. Where trails would be narrowed, the proposed project would include use of eucalyptus logs, branches or other non-structured techniques to guide trail users along a narrowed trail and protect newly revegetated areas. The proposed Project would include the following standards for trail width, which may be narrowed in places if needed to reduce environmental impacts:

- **Ten-foot** width in locations where there is high traffic, such as the initial part of the trail leading from Sperling Parking Lot that also serves the Coronado Butterfly Preserve traffic at the far eastern part of the Anza Trail;

- **Eight-foot** width for the most heavily traveled Coastal Trail segment from Access Point F east to the boundary with UCSB property (see Figure 2); and,

- **Six-foot** width for all other segments of the Coastal and Anza trails to maintain a natural aesthetic while also providing sufficient width to allow users to pass one another comfortably;

Changes in trail widths along the existing Coastal and Anza trails would generally involve narrowing wide trails to meet these standards. However, where trail would need to be widened to meet specific requirements, consideration would be given to existing and projected use and sensitivity of adjacent habitats. Where use levels permit and adjacent habitats are sensitive,

trails would be permitted to be narrower than these standards to avoid unnecessarily impacting adjacent habitats.

Construction Equipment and Staging

A mix of heavy construction equipment and hand held tools would be used to restore existing trail segments as well as to construct proposed realignments, crossings, and proposed beach access points and drainage improvements.

Table 1: Construction Equipment List

Construction Equipment	
• 36-inch-wide Kubota K-008 tractor • Small haul truck (e.g., pick-up truck) • Roller compactor • Compressors • Hammer drills • Shovels • Pickaxes	• Chainsaws • Loppers • Pry bars • Pulaskis • Other standard trail construction equipment

Mobile heavy construction equipment (e.g., small tractor, pick-up truck, and small roller compactor) would enter and exit the Ellwood Open Space via Santa Barbara Shores Drive; however, the trail construction crew would park at the Sperling Parking Lot. Construction equipment would be staged on the existing trail segments or immediately adjacent within disturbed or unvegetated areas. At the beach access points, construction equipment would be staged in flat areas adjacent to the trail characterized by disturbed vegetation. All construction equipment would be removed at the end of the day and stored in the haul truck or at a designated area with appropriate signage in the Sperling Parking Lot. Overnight equipment storage areas would be fenced.

Trail Fill Material and Tread

More than 70 percent of the existing Coastal and Anza trails are entrenched (i.e., below the grade of the surrounding area). The proposed Project would utilize a number of identified borrow pits at Ellwood Mesa (see Figure 2) for excavation of approximately 900 cubic yards of native cut and fill material that would be used to bring the trails up to grade or slightly above grade, allowing water to sheet flow off of the trail surface. These borrow sites include locations along the blufftop segments of the Coastal Trail on Ellwood Mesa where past grading has created berms alongside the trails. Removal of these berms would provide native fill material and, in addition, would allow re-establishment of natural drainage flows inland, away from the bluffs (see Figure 2).

Trail Compaction and Scarification

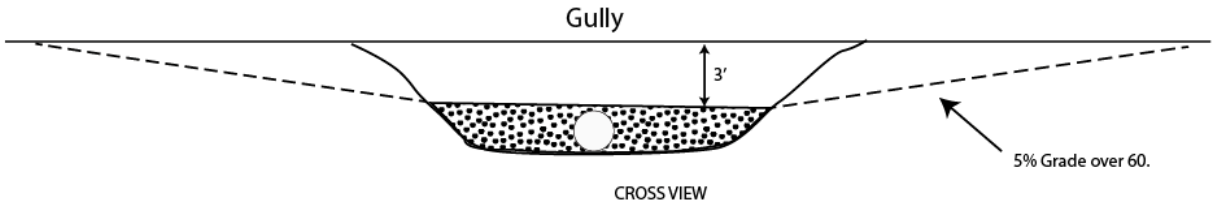
Following the addition of the 900 cubic yards of native fill material to selected trail segments, the Project would include the use of a roller compactor to bond the fill material to the existing trail segments. Additionally, the Project proposes shallow scarification using either a tractor or hand tools along the trail network to loosen several inches of the trail surface tread to establish a blended surface with native fill material.

Trail Flow and Erosion Control

The proposed Project would create a naturally meandering (i.e., curved) trail alignment along the existing Coastal and Anza trails on Ellwood Mesa in places where these trails are relatively straight for long distances or in places where there are substantial erosion issues. Additional erosion control measures would include the construction of dips or places for the water to flow off the trail at regular intervals. However, erosion control measures included in the proposed Project would focus primarily on elevating the existing trails so that they would be slightly above grade and outsloped, allowing water to flow off of the trail and away from the bluffs rather than ponding on its surface.[1] In some places where trails would be narrowed, eucalyptus logs, branches or other non-structured techniques would be used to guide trail users along a narrowed trail and protect newly revegetated areas from damage and erosion. More substantial erosion control measures associated with Beach Access Points E and F are described in detail below.

Gully Crossing and Boardwalk Bridges

The Project proposes the use of a culvert and fill, with rock facing, to span the inactive gully crossing south of Sperling Parking Lot (Gully A). The existing trail would be sloped into and out of the gully at a grade of five percent over 60 feet using an 18-inch culvert to permit drainage and wildlife passage. By gradually sloping the existing trail down to the gully crossing, the crossing would not be visible from more distant trail segments and would also not require handrails.



In addition to the crossing at Gully A, there are two locations, including crossings at Drainage A and Devereux Creek, where boardwalk style bridges would improve accessibility, minimize the need for expensive engineering, and maintain the area's natural aesthetic. The use of screw piling design would allow for the construction of boardwalks approximately 18 to 24 inches above ground level, eliminating the need for handrails. Additionally, to the extent feasible the decking on these boardwalk bridges would have spacing no greater than 0.5-inch in order to increase accessibility across the drainages.

Beach Access Asphalt Removal and Step Construction

At Beach Access Point E, the asphalt roadbed that once allowed residents from the Santa Barbara Shores neighborhood to drive down to the beach has become a substantial contributor to erosion damage at this access. The Project proposes to remove approximately 15 cubic

[1] Outslope—to grade the trail so that it slopes at an angle of from five to seven percent to the outside or lower edge, allowing water to sheet flow off the trail and away from it.

yards of the existing aging asphalt along Beach Access Point E, and to reduce the steepness of the grade at this location by creating a curvilinear trail (see discussion associated with Component 7 below). Asphalt would either be reused in drainage improvements at this access point or exported from the site. Additionally, in order to address long-term erosion impacts, the proposed Project would establish two bioswales to capture runoff along segments of the trail. These bioswales would be stabilized with the old asphalt removed from the roadbed or with imported rock and revegetated with native species. Runoff captured in these bioswales would be directed into two drain pipes that would outlet on the beach.[2] The downdrains would be approximately 20-30 feet in length and constructed within existing erosional gullies on the bluff face that would be backfilled with native fill material including asphalt, if acceptable, and revegetated with native species. Drainage from these downdrains would be conveyed down to an ungrouted outlet on Ellwood Beach.

At Beach Access Point F, where the existing 275-foot beach access trail is narrow and steep, the Project proposes to construct approximately 100 steps over the beach access trail. In order to maintain the natural character of the surrounding area, the steps would be constructed from six- by eight-foot rough sawn wood, treated with non-toxic materials, to form rectangular boxes that vary in length depending on the grade. Decomposed granite filler would be used to blend with the existing natural setting, while providing for durable, long-lasting use of the stairway. In order to address long-term erosion impacts associated with Beach Access Point F, a gravel infiltration trench with a buried perforated pipe and filter sleeve would be established on the eastern side of the trail. Runoff from the proposed stairs would percolate through the gravel trench into the 12-inch perforated filter cloth wrapped pipe and would be conveyed down to an ungrouted outlet on Ellwood Beach.

Beach Ramping/Stairways

At both Beach Access Points E and F where the existing trail ends at the sandy shoreline, the bluff drops off approximately six feet from the lower bluff area down to the sand. At both access points, due to the impacts of poor trail design, erosion has created substantial damage along the lower edge of the bluffs. The Project would create ramps from native fill that would provide safer access to the beach. Ramps would be repaired as needed if damaged by wave action.

Mitigations Included in the Proposed Project

The proposed recontouring and minor realignments of the existing trail system on Ellwood Mesa would proactively include a number of mitigation measures intended to reduce potential impacts associated with the proposed Project. The proposed recontouring and minor realignments would provide safer public access and reduce erosion impacts associated with geological and hydrological resources. Additionally, the proposed trail route as well as the proposed Habitat Restoration Plan (see Attachment 1) included as a part of the proposed Project would reduce potential impacts to biological resources.

- Newly constructed segments of the Coastal and Anza trails (approximately 0.54 miles) would be routed to avoid ESHA, including vernal pools and riparian habitat, to the maximum extent feasible.

- The proposed Project would mitigate impacts to ESHA as a result of the construction of the drainage crossings at Drainage A and Devereux Creek along the shared Coastal-

[2] Downdrains would consist of pipe of 12 to 24 inches in diameter.

Anza Trail at more than a 3:1 mitigation ratio, resulting in approximately 0.05 acres of restoration at Drainage A and 0.19 acres of restoration at the Devereux Creek Crossing.

- Trail segments, including the beach access points, would be constructed or recontoured with a curvilinear flow that would reduce erosion and would include additional erosion control measures such as trail outsloping and bioswales, which would direct and route runoff away from the trail system and the bluff face.

- The use of the berms along the blufftops as borrow pits would redirect surface water runoff inland, away from the blufftop and consequently would reduce blufftop erosion. Additionally, the use of bioswales and downdrains at Beach Access Points E and gravel infiltration trenching and perforated drainage pipe at Beach Access Point F would address potential erosion impacts at these locations.

- The proposed Project would include approximately 13 acres of total habitat restoration, including the removal of non-native species, and increases in the coverage of native coastal scrub, wetland, and grassland vegetation. Consequently, the ratio of restoration to vegetation removal associated with trail realignments would be a minimum of 25:1 under the proposed Project.

- The proposed restoration would include planting of southern tarplant (*Centromadla parryz* ssp. *australzs*), a California Rare Plant Rank (CRPR) 1B.1 species (see Table 4).

Proposed Trail Route and Improvements

The proposed trail improvements have been broken down into seven components, which include specific segments of the existing trail. Please refer to Figure 2 for the location of each trail component.

The proposed Project would improve public access to the Ellwood Mesa and associated beach access points. The Project proposes specific trail improvements for seven areas of the existing trail system (refer to Figure 2), including the two beach access points connecting the blufftop to the Ellwood Beach. The trail system as proposed would largely follow the existing trail network, comprising the Coastal and Anza trails. For ease of understanding the treatment of different trail segments, the proposed Project has been divided into seven components (refer to Figure 2):

Sperling Parking Lot to Gully Crossings (Component 1)

Trail Component 1 would include drainage and tread improvements to the existing shared Coastal-Anza Trail as well as a minor realignment and the installation of drainage crossings over Gully A and Drainage A.

From the parking lot, the existing shared Coastal-Anza Trail continues for 500 feet to the south to a point where it veers to the southwest. The Project proposes to narrow this existing trail segment to a width of ten feet and to restore the adjacent areas; eucalyptus logs or other natural materials would be installed to guide trails users as needed. At the point where the trail veers to the southwest, the Project proposes to construct 550 feet of new trail through a meadow area along the alignment described in the City of Goleta General Plan and Coastal Land Use Plan (GP/CLUP). The original trail would be revegetated with native species and signs and eucalyptus logs, branches or other natural materials would be installed to guide trail users through restored areas and past the closed trail.

Approximately 275 feet along the proposed trail realignment, the proposed trail would cross an approximately six-foot deep and 20-foot wide gully (Gully A).

The Project proposes to ramp the proposed realigned trail down into and out of the gully at a grade of five percent, using an 18-inch diameter culvert to allow drainage and wildlife passage through the gully (see Figure 3). Native fill material from the trail grade would be used to cover the culvert and rock facing would be used to prevent erosion and reinforce the sides of the proposed trail crossing.

Drainage A: The proposed trail reconfiguration would include a boardwalk bridge across Drainage A, which would be constructed with screw piles. The decking on these boardwalk bridges would be designed to increase accessibility across the drainages.

Approximately 125 feet past the culvert crossing, the proposed realigned trail would cross Drainage A, a channel approximately four feet deep and 25 feet in width. The Project proposes to grade the realigned trail down to a point between 24 and 30 inches above the drainage floor and construct a boardwalk-style crossing utilizing screw piling technology that does not require engineered foundations on either side. Direct impacts—installation of screw pilings, and removal of old fill from the current trail—and indirect impacts—from shading by the eight- by 25-foot boardwalk—would total approximately 0.01 acres; however, the proposed Project would restore approximately 0.05 acres with native vegetation.

Immediately after the Drainage A boardwalk style crossing, the proposed trail realignment would reconnect with the existing shared Coastal-Anza Trail and cross another unnamed inactive gully that is divided into two segments by a narrow ridge. From the Drainage A crossing the existing trail would be graded down three feet and the excavated material would be used to fill the first part of the upper inactive gully. The trail would cut through the narrow middle ridge, which would be used for fill in the second part of the inactive gully. Additionally, rock facing would be used to protect the downstream sides of the fill areas within the gullies.

Devereux Creek Crossing (Component 2)

South of the unnamed inactive gully, the existing trail follows the west edge of the eucalyptus grove for 600 feet to Devereux Creek. The Project proposes minor tread work in this area, designed to improve water sheet flow off of the existing trail. At the midpoint of this section, the trail dips down abruptly at a small drainage crossing then climbs back up abruptly on the other side. The Project proposes sloping at both ends of the dip to achieve a gentler grade. Additionally, near the intersection of the trail with the Coastal Loop Route, the Project proposes adjusting the trail route slightly to the east to create a more direct route that improves accessibility.

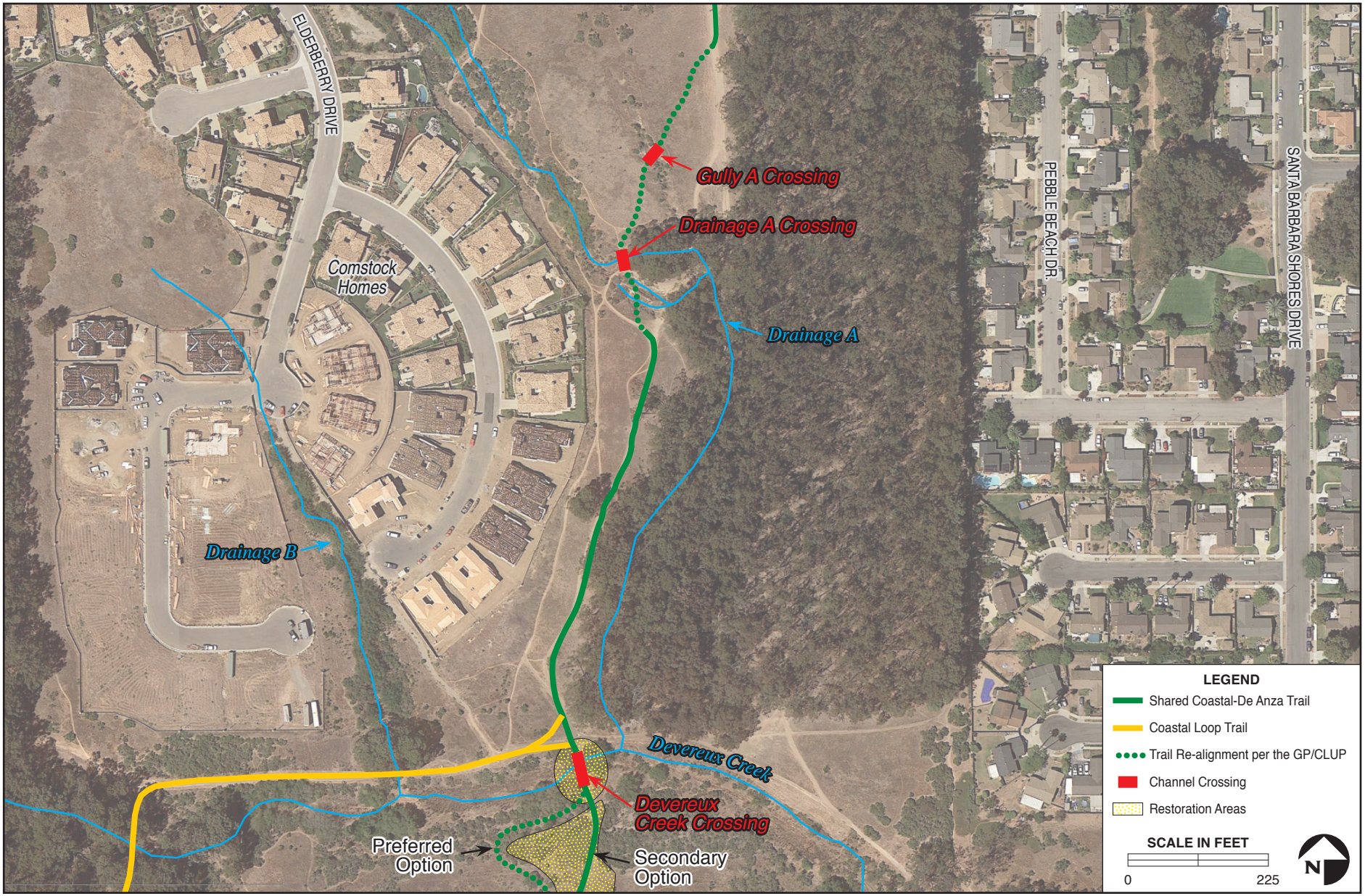
Devereux Creek: The proposed trail reconfiguration would include a boardwalk bridge across Devereux Creek, which would be constructed with screw piles similar to Drainage A. The crossing would be approximately eight feet wide and 60 feet in length.

Historically, access across Devereux Creek was made easier through the addition of fill with small drainage pipes in the center to create a raised roadway. While much of the drainage has filled in with sediment, the center part of the channel continues to flow through several of the pipes. However, at higher flows the water flows up over the old roadway and continues downstream. This process has created a deeper channel, with the existing trail blocking the normal flow of water.

The Project proposes to dredge out the middle of the channel to reestablish a normal creek flow, including removal of the existing pipes, and to replace the current trail with a boardwalk-style crossing using screw piling technology that would not require engineered foundations on either side. Direct impacts—installation of screw pilings, and removal of old fill from the current trail—and indirect impacts—from shading by the eight-foot wide by 60-foot long boardwalk—would total approximately 0.05 acres; however, the proposed Project would restore approximately 0.19 acres with native vegetation.

Under the Preferred Option, Trail Component 2 would include a 200 foot-long realignment of the existing trail to improve accessibility. However, under the Secondary Option, the proposed Project would only include drainage and tread improvements to the existing shared Coastal-Anza Trail.

Immediately south of the Devereux Creek crossing, the current route heads steeply uphill at a grade of 12 to 14 percent, exceeding accessibility standards and resulting in erosion and damage to the trail tread. The preferred option for the proposed Project would be to re-route the trail in order to reduce the grade to five percent. This would address long-term erosion impacts and improve overall accessibility. Under the preferred option, following the Devereux Creek crossing, the proposed trail would turn west traveling approximately 180 feet before curving back to the east and rejoining the existing trail (refer to Figure 2). The switchback segment would avoid native vegetation to the maximum extent possible. Further, where feasible, perennial vegetation intersecting the proposed realigned segment would be relocated. However, the secondary option for this segment would be to restore the trail along its existing alignment. While re-grading along the existing alignment would address some of the existing erosion issues, it would not improve accessibility over the steep grade.



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Gully and Drainage Crossings

FIGURE 3

Coastal Loop Trail (Component 3)

The existing Coastal Loop Trail intersects with the existing Coastal Trail just a few feet before the Devereux Creek crossing. Due to its less intensive use, the Project does not propose major changes to this existing trail. However, the Project proposes to make improvements to the trail tread and add erosion control measures, including increasing the trail outslope and adding dips where water can be directed off the trail.

The proposed Project would remove fennel and mustard within the trail corridor that currently obstructs coastal views from the trail.

Near the Sandpiper Golf Course boundary, the trail turns south and crosses Devereux Creek. The drop down into and out of the creek is abrupt and in places roots from the nearby eucalyptus trees present a minor safety hazard. However, because safe accessibility issues have been addressed on the main creek crossing, the Project only proposes sloping the existing trail at these locations rather than constructing an engineered crossing. As the trail reaches the mesa, it flattens out and continues along the golf course fence line for 600 feet until it reaches the blufftop. Along this segment, the Project proposes to create a more natural curvilinear flow. Additionally, trail scarification would be employed to loosen the existing tread and native fill material would be used to bring the tread up to grade.

Once the Coastal Loop Trail reaches the bluffs, it turns east and follows the bluffs for 2,200 feet to its intersection with the Coastal Trail route near Beach Access Point F. These sections are characterized by moderate entrenchment (i.e., below grade trail segments) and in some cases an overly wide trail has been created. In addition, invasive species such as fennel (*Foeniculum vulgare*) and mustard (*Brassica* spp.) have obstructed views from the bluff and displaced native species. The Project proposes to add native fill in the entrenched areas, narrow the existing trail width to six feet, remove non-native species adjacent to the trail, and install eucalyptus logs, branches, or other natural material to guide trail users.

Coastal-Anza Connector Trails (Component 4)

Trail Component 4 would include drainage and tread improvements to the existing shared Coastal-Anza Trail as well as a minor realignment where the Coastal Trail splits from the Anza Trail. This realignment would avoid sensitive vernal pool habitat, which is currently impacted by existing trail use.

Once the shared Coastal-Anza Trail crosses Devereux Creek and climbs onto the mesa, the existing trail follows a diagonal to the east, climbing gradually to the point where the proposed Project would split the trails, with the Anza Trail continuing due east and the realigned Coastal Trail continuing towards the bluffs (refer to Figure 2). Due to the location of several vernal pools along one of the existing routes to the blufftop, Policy OS 5 of the GP/CLUP requires an alignment that avoids the pools by heading southeast to Beach Access Point F (refer to Figure 3-3 in the GP/CLUP). The proposed Project would improve the trail corridor by bringing the existing entrenched trail up to grade, adding dips and other erosion

control measures, and realigning the shared Coastal-Anza Trail per the GP/CLUP alignment to avoid the sensitive vernal pool areas (refer to Figure 3).

Currently, most trail users either continue east on the Anza Trail or take one of the existing connector routes to the blufftop. The main route to the bluffs currently crosses through a vernal pool and, as a result of Policy OS 5 of the GP/CLUP, requires a realignment of the trail so that it diagonals directly to Beach Access Point F. The Project proposes to construct a six foot-wide trail along the GP/CLUP alignment, with tread compaction and restoration along the trail corridor. Because the realignment passes through dense populations of Harding grass (*Phalaris stenoptera*) and mustard, the Project proposes to remove non-native vegetation within 30 feet on either side of the trail centerline and replace it with native species (see Attachment 1). Signs and eucalyptus logs, branches or other natural materials would be installed to guide trail users through restored areas and past closed trails that cross vernal pools.

Juan Bautista De Anza Trail (Component 5)

Trail Component 5 would include improvements to the existing Anza Trail as well as a minor realignment to avoid sensitive vernal pool habitat, which is currently impacted by existing trail use.

Emergency access to Ellwood Mesa is provided in this area via Santa Barbara Shores Drive, which enters the mesa from the north, approximately 600 feet east of the proposed divergence of the Coastal and Anza Trails. Under the proposed Project, emergency access would continue to be provided across the Mesa on the existing natural surface trail that connects with Santa Barbara Shores Drive; any future potential improvements to emergency access would be considered separately.

At the proposed point that the Coastal and Anza Trails diverge, the Anza Trail trends east across the middle of Ellwood Mesa for approximately 2,000 feet, primarily along the worn emergency road that has deteriorated into a slightly entrenched double track. The proposed Project would make improvements to the double track sections of the existing trail corridor, bringing the trail up to grade, narrowing the trail width to six feet, and adding dips as well as other erosion control measures.

The GP/CLUP also calls for a realignment of the Anza Trail to bypass a number of vernal pools on the eastern end of the Project area per Policy OS 5 (refer to Figure 3-3 in the GP/CLUP). The Project proposes to construct a 1,230 foot long trail segment six feet wide around the vernal pools along the GP/CLUP alignment. Signs and eucalyptus logs, branches or other natural materials would be installed to guide trail users through restored areas and past closed trails that cross vernal pools.

Once the proposed realignment reconnects with the existing Anza Trail, the trail turns from double to single track and winds its way for 600 feet to a wide north-south roadway near the boundary of Ellwood Mesa with UCSB. The Project proposes to either widen the single track trail to a standard width of six feet or optionally leave this narrow segment intact to minimize impacts to native grassland. If the trail is widened, due to the high density of native grasses in the area, this section would require a detailed restoration plan for removal and transplant of the native grasses elsewhere. The existing Anza Trail turns south and continues along the East Boundary road for 900 feet to a point where it turns east and crosses onto UCSB property. The Project proposes to narrow the boundary road to a width of eight feet and create a more curvilinear trail alignment that allows water to sheet flow off of the trail. Eucalyptus logs,

branches or other natural materials would be installed where needed to guide trail users along this narrow segment.

Coastal Blufftop Trail (Component 6)

The main blufftop portion of the existing Coastal Trail stretches from Beach Access Point F for 2,100 feet west to Beach Access Point E and then an additional 600 feet to the point where it crosses onto UCSB property. The Coastal Trail is characterized by deep entrenchment that has resulted in a proliferation of social trails, rough, rutted trail surface, and potholes often filled with muddy water.

The blufftop trail section of the Coastal Trail is the second most heavily used trail section on Ellwood Mesa. The trail is located very near the bluff edge and is below grade resulting in the creation of gullies and potholes as well as erosion from surface water runoff over the bluff.

The Project proposes to use native fill material from a nearby berm to address the existing trail degradation and reduce sheet flow over the blufftop. Fill material would be used to eliminate the entrenchment areas and to implement erosion control measures that would prevent future trail degradation. Eucalyptus logs, branches or other natural materials would be installed where needed to guide trail users past restoration areas.

Beach Access Points (Component 7)

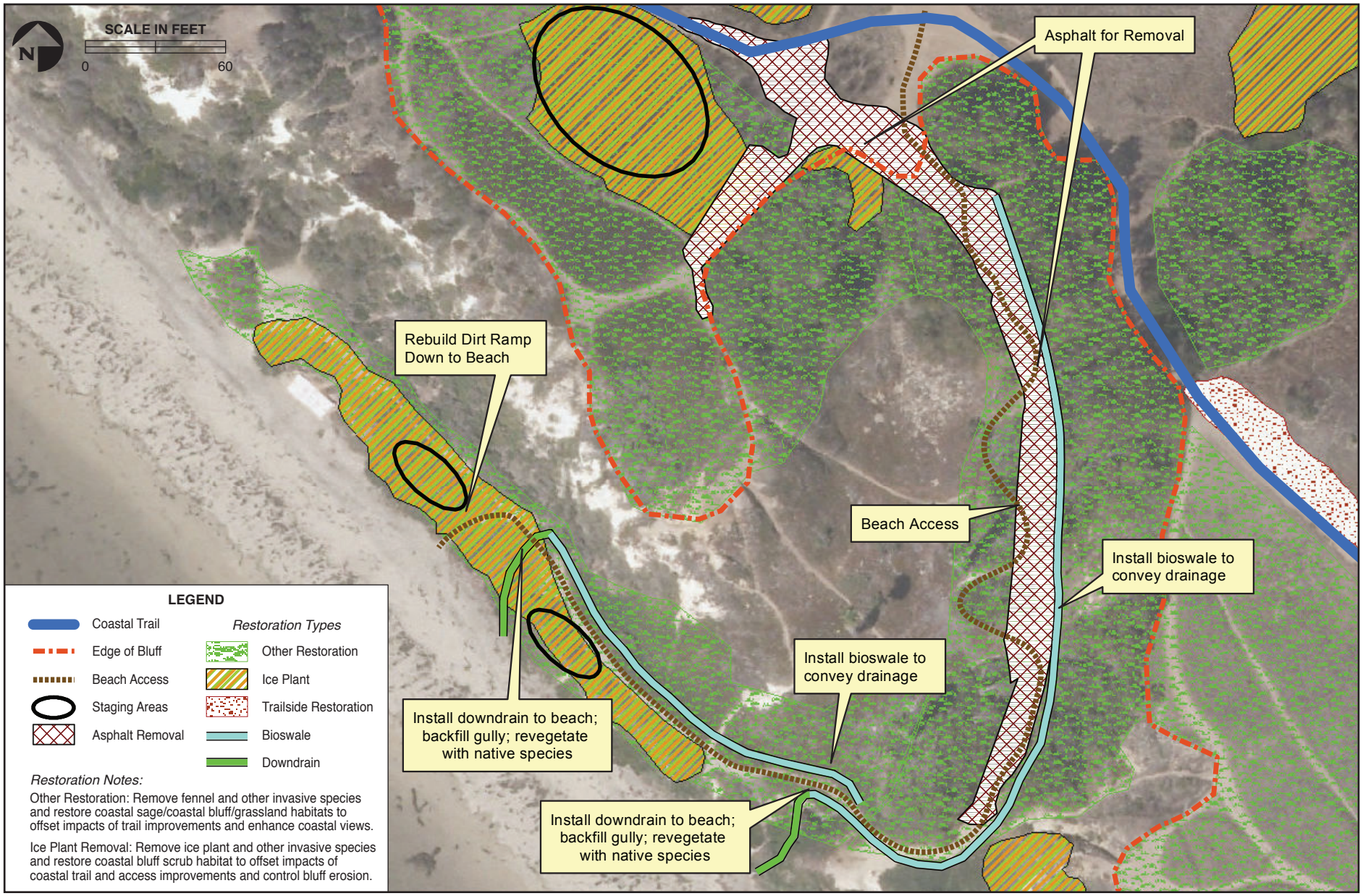
Beach Access Point E was originally constructed almost 50 years ago to provide pedestrian and vehicle access to a recreation area for Santa Barbara Shores neighborhood residents. Over time, water flowing down the road from the mesa has caused substantial erosion and damage to the trail as well as the lower bluff edge.

The Project proposes to remove the asphalt and restroom foundations (while keeping the red brick post that signals the start of the trail down to the beach) and create a curvilinear trail alignment that allows water flow off of its surface. Additionally, a sloping ramp-style path down to the sand would be constructed to improve safe access to Ellwood Beach (see Figure 4). As previously described, in order to address long-term erosion impacts, the proposed Project would establish two bioswales to capture runoff from areas adjacent to the access trail and would direct it into two downdrains that would outlet on Ellwood Beach. The downdrains would be approximately 20-30 feet in length and constructed within existing erosional gullies on the bluff face that would be backfilled with native fill material and revegetated with native species.

Beach Access Point F was a steep dirt road that was originally constructed to serve oil equipment near the beach. Over time, the road has disintegrated and erosion has entrenched the trail to a depth of three to four feet on the top half, with tread that is less than one foot wide in places.

Beach Access Point F: Under the proposed Project, safe beach access would be provided by a stairway, which would be constructed at specifications that meet the natural surroundings of Ellwood Mesa. The stairway (right) would also serve as a permanent solution to erosion and gullying along Beach Access F.

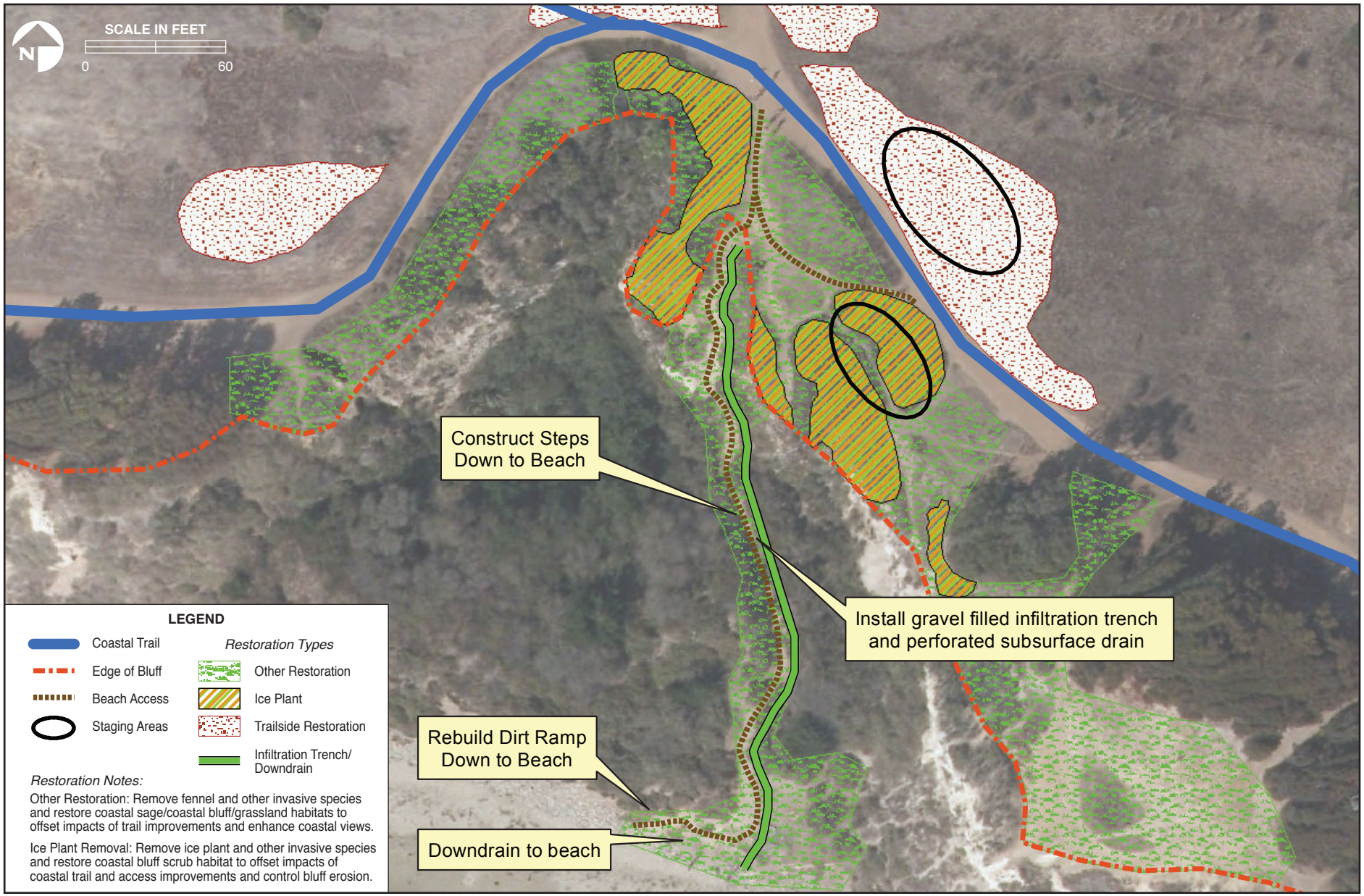
The Project proposes to construct a series of steps (approximately 100 steps over 275 feet) through the entrenched areas and to restore the open area at the access point, including the removal of the fire pit and regrading of the sloping ramp to minimize the impacts of trail use and erosion. In addition, the Project proposes restoration and erosion control (e.g., berms) at the top of the trail to divert the majority of water inland, away from the access point so it no longer flows off the mesa and down the trail (see Figure 5). In order to capture the remaining runoff at Beach Access Point F, the proposed Project would construct a gravel infiltration trench with a buried perforated pipe wrapped in filter fabric on the eastern side of the trail. Runoff from the proposed stairs would percolate through the gravel trench into the 12-inch pipe and would be conveyed down to the outlet at the beach.



amec

Beach Access Point E

FIGURE 4



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Beach Access Point F

FIGURE 5

Trail Improvements & Maintenance

Implementation of the proposed Project would include approximately 0.54 miles of realigned trail and up to approximately 0.51 acres of associated vegetation removal. All other trail improvements would follow the existing trail network.

Approximately 75 percent of trail improvements (i.e., 1.56 miles) would follow the existing trail network and would only require minor grading to improve drainage or narrowing to reduce overly wide trails. A limited amount of earthwork would also be necessary to create standard trail widths as described above. The remainder of the improvements (approximately 0.54 miles) would consist of minor realignments, consistent with the GP/CLUP, that would pass through open areas of the mesa and would require clearing a corridor six to ten-feet wide, or between approximately 0.31 and 0.51 acres of vegetation removal, with restoration along the trail corridors and the identified borrow sites. Restoration would include the implementation of a five-year monitoring plan (see Attachment 1). Trail construction equipment that would be used during trail construction and maintenance is listed in Table 1. Construction would be performed by experienced trail builders, occurring over approximately three months, in compliance with Goleta standard construction schedule requirements.

Trail work would be scheduled to occur in late fall, winter, or early spring while the soil is still workable. However, implementation of the improvements would be phased in accordance with biological constraints including nesting bird and butterfly aggregation seasons.

The proposed trail improvements would incorporate features that minimize erosion, limit downstream sedimentation, and reduce ongoing maintenance requirements using erosion control and minimization best management practices (BMPs) that manage and control water flows affecting the trails. Design would also include features to minimize conflicts between different user groups and enhance user safety (e.g., stairs at Beach Access Point F). In addition, trail construction would include weed eradication and control practices to minimize the spread of non-native species along the trail corridors.

Maintenance activities on the Ellwood Trails would focus on trail tread repair, erosion control, trail slumping, and removal of slides, but would also include targeted removal of invasive weed species.

Proposed Trail Corridor Restoration

In addition to the proposed trail improvements, including approximately 900 cubic yards of native cut and fill for proposed recontouring, the Project also proposes to restore approximately 13 acres of natural habitat. The Restoration Plan included in the proposed Project (see Attachment 1) would remedy many of the impacts to native vegetation and environmentally sensitive habitats that have resulted from past land uses (e.g., grazing and oil production) at Ellwood Mesa. Additionally, restoration under the proposed Restoration Plan would mitigate impacts resulting from vegetation removal associated with the proposed trail realignments.

While the habitat types would largely remain unchanged under the Restoration Plan, major enhancements of the habitat value are proposed for the trail corridors, including the area between the Coastal Trail and the blufftop, as well as the drainage crossings and beach access points. The restoration activities would be implemented in phases over three years, with the first year being the most intensive. Project monitoring for maintenance activities would occur on a

quarterly basis and annual reports would be prepared over a period of three years, documenting the status of the restoration activities relative to the performance standards included in the Restoration Plan.

A general description of the proposed restoration activities has been included below. For details regarding the planting list as well as specific restoration activities within each trail component, refer to the Restoration Plan (Attachment 1). The details presented in the Restoration Plan are included for environmental review and permitting purposes; however, the Final Restoration Plan would be reviewed and approved by the City prior to the commencement of any restoration activities.

Environmentally Sensitive Habitat Areas

The Project proposes removal of non-native plant species, including mustard, fennel, iceplant (*Carpobrotus edulis*), and Harding grass, along the trail corridors of the Coastal and Anza trails, the borrow pits, and the entire length of the blufftops on the ocean side. These areas would be replanted with appropriate native species to improve the ESHAs designated in the Ellwood Mesa Open Space Plan Area. Additionally, the proposed Project would restore ESHA in the vicinity of the Drainage A and Devereux Creek crossings, leading to a substantial net increase in native wetland habitat in these drainages (see discussion below).

Coastal Bluff

Coastal bluff scrub is found along the entire blufftop at Ellwood Mesa as well as along the bluff face (see Figure 6). However, this habitat, particularly along the eastern end the bluff face, is highly degraded by erosional gullies and extensive coverage of non-native species. The Project proposes to remove these non-native species located to the south of the Coastal Trail and revegetate with native coastal species. Erosional gullies on the bluff face in these areas would also be revegetated to address bluff erosion.

Riparian Habitats

Riparian habitat occurs along the drainages in the Ellwood Mesa Open Space Plan Area including Devereux Creek, which traverses the western half of the mesa and Ocean Meadows Golf Course before discharging to Devereux Slough at Venoco Road. Riparian habitats within the Ellwood Mesa Open Space Plan Area include freshwater marsh, riparian scrub, and riparian forest. Freshwater marshes occur along drainages where there is seasonal winter flow and prolonged soil moisture. The Project proposes to realign the shared Coastal-Anza Trail to conform to the GP/CLUP alignment so that it skirts the eucalyptus groves south of the parking lot. Additionally, the proposed Project would restore the nearby gully areas, including Drainage A and the Devereux Creek crossing, which have been impacted by overuse from trail users. The proposed Project would install a boardwalk-style bridge across Drainage A, disturbing approximately 0.01 acres of wetland habitat. However, the proposed Project would restore approximately 0.05 acres of habitat in this area and would provide a crossing that would discourage future disturbance. Similarly, the proposed Project would install a boardwalk-style bridge across Devereux Creek. In this area, the screw pilings and shading from the proposed bridge would impact approximately 0.05 acres of wetland habitat; however, the proposed Project would restore approximately 0.19 acres as a part of the proposed Restoration Plan.

Southern Vernal Pools

Prior land uses, including horse grazing and oil development, have degraded the vernal pools in the Ellwood Mesa Open Space Plan Area. The Project proposes to enhance the existing vernal pools, realign sections of the Coastal and Anza Trails to avoid identified vernal pools, and to add several new vernal pools by borrowing material for trail fill and restoring the areas with plants unique to vernal habitats.

Native Grassland

Though native grasslands have very limited distribution in Santa Barbara County due to the introduction of non-native grasses and herbs, livestock grazing, and modification of the natural fire regime, Ellwood Mesa contains one of the largest stands of native grasslands in Santa Barbara County. The Project plan proposes to increase native grasslands at Ellwood Mesa by adding native species along the trail, borrow pits, and other restoration areas. Additionally, any native grasses impacted by trail realignment would be relocated to suitable habitat and/or used in restoration plantings.

Coastal Sage and Scrub

Coastal sage scrub and coastal bluff scrub occur in various locations of the Ellwood Mesa Open Space Plan Area. Small isolated patches of coastal sage scrub frequently intergrade with native and non-native annual grassland and coyote bush. The Project proposes to increase coastal sage and bluff habitats along the entire blufftop at Ellwood Mesa by removing non-native species and planting native coastal species to the south and adjacent to the Coastal Trail.

<u>Public Outreach</u>

In the spirit of Coastal Act Finding 30006, two public outreach meetings, including a site walk, were conducted during the development of the proposed Project. The goal of these meetings was to review the Project objectives, gather community input, and subsequently demonstrate how community input has been incorporated into the design of the proposed Project. The first outreach meeting was conducted at Ellwood School on 6 September 2012. During this meeting, the SBTC described the current state of the trail system and provided goals as well as conceptual options for improving problematic areas. Additionally, there were breakout sessions during which the community was provided the opportunity to address Project elements specifically, including trail design, habitat restoration, engineered crossings, and beach access. During the second public outreach meeting conducted on 5 December 2012, the SBTC provided a pared down set of specific design options to address the public's goals for the trail system. After much internal discussion among City Staff and the SBTC Project team, six

Following the first public outreach meeting, a site walk was conducted on 8 September 2012. The site walk attracted a diverse group of attendees, including hikers, dog owners, and bicyclists.

design principles were developed by SBTC for presentation at the second outreach meeting in December 2012.

1) Trails should be natural, wider in some places and narrower in others, with an average width of six feet in areas without significant traffic and eight feet in more heavily used areas.
2) Borders should be natural and include addition of native plants to enhance the habitat along the trail corridors and the trails should have a natural surface composed of native soil.
3) The trail design should complement existing parallel trails along the blufftop that allows users to move freely and enjoy views while traveling between and on the parallel trails and the Coastal Trail.
4) Restoration along the trail corridors should be designed to improve the natural setting of the Ellwood Mesa-Sperling Preserve and enhance user experience. Non-native plants, such as fennel and mustard, should be removed along the blufftop to improve visibility and to enhance the native habitat, especially in environmentally sensitive areas.
5) Gully and creek crossings should include designs that allow for safe passage while at the same time be as non-intrusive and natural as possible. Use of boardwalk-style designs as close to the surrounding surface is important as they would not require use of handrails and have the least impact on the viewshed.
6) Alternatives should include options that require the least amount of change possible.

Additional coordination with stakeholders (e.g., the public, interested parties, and land-owners in the vicinity of the Ellwood Mesa) will also occur during the public review period for this Initial Study-Mitigated Negative Declaration (IS-MND) and during Goleta Planning Commission and California Coastal Commission (CCC) project consideration. During the comment period, stakeholders will have the opportunity to voice opinions, concerns, and suggestions prior to implementation of the final design.

7. APPROVAL REQUIRED BY OTHER PUBLIC AGENCIES:

California Coastal Commission (CCC)

8. SITE INFORMATION:

Table 2: Site Information

Site Information	
General Plan and Coastal Land Use Plan Designation	*Open Space/Passive Recreation*
Zoning Ordinance, Zone District	*Recreation (REC)*
Site Size	*223.6 acres*
Present Use and Development	*Recreational Use as Open Space and Trails*
Surrounding Use/Zoning	*Design Residential, Planned Residential, Single Family Residential, Industrial Research Park*
Access	*Sperling Trailhead Parking Lot via Hollister Avenue*
Utilities and Public Services	*Water Supply: N/A (Water required for restoration planting would be imported to the site.)* *Sewage: N/A* *Power: N/A* *Natural Gas: N/A* *Telephone: N/A* *Fire: Santa Barbara County Fire Department (SBCFD)* *School District: N/A*

9. ENVIRONMENTAL SETTING:

Project CEQA Baseline

Following the adoption of the Ellwood-Devereux Open Space and Habitat Management Plan in 2004, the Project site was designated as Open Space. The Project site is traversed by the Coastal Trail and Anza Trail, which begin at the Sperling trailhead parking lot to the north of the site off of Hollister Avenue. The Project site is also characterized by a number of connector trails and social trails, which form a larger trail network. However, the trail network is currently affected by ponding, trail braiding, steep grades, and other signs of degradation, including severely eroded beach access points, which may prohibit use by some trail users.

Surrounding Land Use

The Project site (i.e., the Ellwood Mesa Open Space Plan Area) is surrounded by a mix of uses to the north, including Recreation, Residential, and Industrial land uses, as well as Hollister Avenue. Additionally, the Project site is bordered to the east by the Coal Oil Point Reserve which is a part of the University of California Reserve System and to the west by the Sandpiper Golf Course and the Comstock Homes (The Bluffs) subdivision.

Slope/Topography

Much of Ellwood Mesa is on a gently sloping marine terrace that has been uplifted by the More Mesa Fault System. The marine terrace that forms the mesa is approximately 40-85 feet above sea level. However, stream erosion has dissected the marine terrace to produce isolated mesas and intervening drainages that form most of the upland portions of the Ellwood Mesa Open Space Plan Area. Grades of five to ten percent characterize most of the northern portion of the area, and steepen to more than 30 percent towards Devereux Creek. The sea cliff along Ellwood Mesa is steep to very steep, ranging in grade from 50 to 300 percent. Remnants of an old asphalt road down to the beach are still present at the southwest end of the Ellwood Mesa Open Space Plan Area, within Beach Access Point E. This road is believed to be an old oil field access road from a gas plant formerly located near the top of the bluffs leading to a small road at the base of the bluffs. The road was used to access piers and wells located along the shoreline (City of Goleta 2004).

Topography in the vicinity of Devereux Creek, as well as the gullies within the Ellwood Mesa Open Space Plan Area, is characterized by grades exceeding ten percent. These steep grades exceed safety thresholds and can make the trail inaccessible for some users.

Flora and Fauna and Surface Water Bodies

The habitats and wildlife resources within the Project area reflect those found within the coastal plains of southern California. Previous and existing human activities related to recreation, grazing, oil development, farming, and other land uses are responsible for the large proportion of nonnative species found in the Project area. Grassland and eucalyptus woodland are the dominant habitat types found in the Project area. Several other habitat types also are present in smaller acreages, including southern vernal pools, which form as winter rains fill topographic depressions where underlying claypan layers prevent the water from percolating through to the subsurface. In addition, Devereux Creek and two drainages to the north cut through the Project area in relatively deep channels (City of Goleta 2004).

The Project area supports a variety of wildlife species typical of coastal ecosystems. Avian resources are diverse as the eucalyptus and other woodland habitats provide perching, nesting, and roosting areas and grasslands provide foraging resources for a number of bird species. However, urban areas and transportation corridors have created barriers to dispersal for terrestrial wildlife, especially for medium and large carnivores. Additionally, habitats in the Project area are more or less isolated from large expanses of similar habitats in the foothills of the Santa Ynez Mountains. Devereux Creek and its northern tributaries, such as Phelps Ditch, are the last remaining physical linkages between the Ellwood Mesa Open Space Plan Area and relatively undisturbed and unfragmented habitats to the north. However, these may be open, semi-permeable, or impermeable movement corridors for ground-dwelling vertebrates,

depending on the species, its body size, dispersal ability, and tolerance for habitat disturbance (City of Goleta 2004).

Cultural Resources

The Ellwood Mesa Open Space Plan Area under the City of Goleta's jurisdiction has experienced long and significant occupation by humans going back at least 8,000 years. There are a number of remains of this occupation known to be present in the general Project region (City of Goleta 2004). An early Holocene occupation has been identified in the archaeological record that reflects the early emergence of non-agricultural village-based groups in the region. Current archaeological evidence suggests that a relatively small population existed in these areas, but by 2000 years before present (B.P.), populations appear to have expanded considerably into resource-rich coastal and near-shore estuarine environments. By the time of European contact to this area of the California coast, some of the large coastal villages had hundreds of occupants and were engaged in both terrestrial and maritime long distance trade (City of Goleta 2004).

10. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist and the following analysis.

☐ Aesthetics and Visual Resources	☐ Land Use and Planning
☐ Agricultural Resources	☐ Mineral Resources
☐ Air Quality	☒ Noise
☒ Biological Resources	☐ Population/Housing
☒ Cultural Resources	☐ Public Services
☒ Geology and Soils	☒ Recreation
☐ Greenhouse Gas Emissions	☒ Transportation/Traffic
☒ Hazards and Hazardous Materials	☐ Utilities and Service Systems
☒ Hydrology and Water Quality	☐ Mandatory Findings of Significance

11. DETERMINATION:

On the basis of this environmental checklist/initial study:

☐ I find that the project COULD NOT have a significant effect on the environmental and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the project could have a significant effect on the environment, there will not be a significant effect in this case because revision in the project have been made by or

agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that although the project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier environmental impact report or mitigated negative declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier environmental document, including revisions or mitigation measures that are imposed upon the project and that a subsequent document containing updated and/or site specific information should be prepared pursuant to CEQA Sections 15162/15163/15164.

☐ I find that although the project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier environmental impact report or mitigated negative declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier environmental document, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

Mitigated Negative Declaration Determination made on June 23, 2014 by Anne Wells, Advance Planning Manager, City of Goleta Planning and Environmental Services (on file).

12. EVALUATION OF ENVIRONMENTAL IMPACTS:

(a) All answers must take into account the whole action involved, including project specific, cumulative, construction, operational, onsite, offsite, direct, and indirect impacts. The explanation of each issue should identify the existing setting, any applicable threshold of significance, impacts, mitigation measures, and residual impact statement.

(b) A brief explanation is required for all answers except "No Impact". The discussion must be supported by appropriate information sources. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to requests such as the project.

(c) The checklist answers must indicate whether the impact is: Potentially Significant, Less than Significant with Mitigation Incorporated, Less than Significant, or No Impact.

(d) A "Potentially Significant" response is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant" entries when the determination is made, then an EIR is required.

(e) A "Less than Significant with Mitigation Incorporated" response is appropriate where such incorporation of mitigation would reduce a potentially significant impact to a less than significant level. If there are one or more "Less than Significant with Mitigation

Incorporated" entries when the determination is made, then a Mitigated Negative Declaration may be prepared.

(f) Supporting Information Sources: References and sources should be attached, including but not limited to, reference documents, special studies, other environmental documents, and/or individuals contacted.

(g) Consistency with Applicable Plans and Policies: The City of Goleta's adopted General Plan includes the City's Coastal Land Use Plan (CLUP), which has not been certified by the Coastal Commission as of this date. Until CLUP certification, development projects within the City's coastal zone are analyzed for consistency with the policies and regulations of the California Coastal Act. This document references Coastal Act provisions that are directly applicable to the following resource analyses and also provides discussion of potential consistency with the City's adopted General Plan and CLUP policies.

13. ISSUE AREAS:

Aesthetics and Visual Resources

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Have a substantial adverse effect on a scenic vista?			×		
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			×		
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			×		
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				×	

Existing Setting

The Ellwood Mesa Open Space Plan Area is located in the southwestern portion of the City of Goleta along the Pacific coastline. Regionally, this area consists of coastal bluffs and terraces rising toward the rocky slopes of the Santa Ynez Mountains, stretches of undeveloped beaches, parklands, open space, and agricultural lands. High quality views of these resources are available from U.S. Highway 101, public streets, trails and parks, and the surrounding beaches (City of Goleta 2004).

The proposed Project site has gently undulating topography that is traversed by Devereux Creek. The northern region of the site slopes toward an unnamed drainage channel that is a tributary to Devereux Creek and is bordered on both sides by large eucalyptus stands. South of the drainage, the topography of the coastal mesa rises to a high point and then gently drops toward the creek before rising again to the coastal blufftops, with unobstructed views of the Pacific coast. Vegetative cover on the site is predominantly disturbed non-native grassland with intermittent clumps of native grassland, coastal sage scrub, and chaparral as well as other non-native plants such as fennel. The site also includes large eucalyptus groves, including the Coronado Butterfly Preserve, which serve as a seasonal migration roost for Monarch butterflies.

The Project site is surrounded by a variety of uses with varying visual characteristics. Hollister Avenue lies immediately north of the site and is characterized by limited commercial uses including a storage facility and parking lots. Additionally, Ellwood Elementary School lies across Hollister Avenue to the northeast of the Sperling trailhead parking lot. Sandpiper Golf Course is located immediately west of the Project site and is screened to the west of the Comstock Homes Development (The Bluffs) by a fairly dense windrow of eucalyptus. To the north of the Project site, east of the existing shared Coastal-Anza Trail, is the Santa Barbara Shores residential development. The Santa Barbara Shores neighborhood is screened from the Project site by a dense grove of eucalyptus.

Views to the east of Ellwood Mesa are obstructed by dense eucalyptus, views of the Comstock Home Development to the west of the eucalyptus grove are provided along the northernmost portions of the shared Coast-Anza Trail (left).

The Coastal Trail provides views of the Santa Ynez Mountain Range (left) as well as the Pacific Ocean coastline (right). The Coastal Trail along the blufftop comprises the some of the most heavily used trail segments as they provide the most unobstructed views of the ocean to the south.

Views of the Pacific Ocean are available from many locations on the Project site, including the coastal trail which skirts the blufftop on Ellwood Mesa. On a clear day, the Channel Islands are visible in the distance from most locations on the Project site. Views of the Santa Ynez

Mountains can also be observed from most locations on the Project site, except where obscured by trees. Adjacent development off Hollister Avenue, including the Santa Barbara Shores neighborhood and the Comstock Homes Development (The Bluffs), is also partially visible to the north from certain locations on Ellwood Mesa.

Thresholds of Significance

A significant aesthetic/visual resources impact would occur if the project resulted in any of the impacts noted in the above checklist (a-d). In addition, per the City's Environmental Thresholds and Guidelines Manual (Thresholds Manual), affirmative answers to the following questions also indicate potentially significant impacts on aesthetic/visual resources:

e) Does the project site have significant visual resources by virtue of surface waters, vegetation, elevation, slope or other natural or man-made features which are publicly visible? If so, does the project have the potential to degrade or significantly interfere with the public's enjoyment of the site's existing visual resources?

f) Does the project have the potential to impact visual resources of the Coastal Zone or other visually important area (i.e., mountainous area, public park, urban fringe, or scenic travel corridor)? If so, does the project have the potential to conflict with the policies set forth in the Local Coastal Plan, the Comprehensive Plan or any applicable community plan to protect the identified views?

g) Does the project have the potential to create a significantly adverse aesthetic impact through obstruction of public views, incompatibility with surrounding uses, structures, or intensity of development, removal of significant amounts of vegetation, loss of important open space, substantial alteration of natural character, lack of adequate landscaping, or extensive grading visible from public areas?

Project Specific Impacts

a) The Project site is bounded to the north by Hollister Avenue, which is designated as a Local Scenic Corridor, with protected scenic views in the immediate vicinity of Sperling Parking Lot. Further, three additional protected scenic views are located on the Ellwood Mesa blufftop south of Devereux Creek along the California Coastal Trail, two of which are located in the immediate vicinity of Beach Access Points E and F (City of Goleta 2006). Policies VH 1.3 and VH 1.4 of the GP/CLUP require that ocean, island, and mountain views from public viewing areas shall be protected through limitations and constraints on development. Additionally, Policy VH 2 requires the protection of Scenic Corridors (City of Goleta 2006).

   Implementation of the proposed Project would consist of trail improvements, including drainage crossings, beach access point improvements, and minor re-grading. The Project would result in localized and temporary obstruction of views over the three-month trail construction period. During this time, a viewer would see a mix of trail construction equipment along the trails on Ellwood Mesa, particularly concentrated near the proposed crossings and beach access points. Additionally, portions of the California Coastal Trail and Anza Trail may be temporarily closed during trail construction. These impacts would be consistent with temporary impacts that may be experienced during future trail maintenance activities.

The proposed Project would not result in any long-term adverse impacts to any of the protected views on Ellwood Mesa, including views of the ocean to the south and the mountains to the north. Removal of the asphalt at Beach Access Point E may result in short-term construction-related impacts to the viewshed from this location. Additionally, construction-related activities at Beach Access Point F may also result in short-term impacts to the viewshed; however, the proposed series of steps down through the entrenched areas of this access point would be constructed using sawn wood and decomposed granite filler to create a natural aesthetic that would be consistent with the character of Ellwood Mesa and therefore consistent with GP/CLUP Policy OS 2.7(b). Consequently, implementation of the proposed Project would improve the view from this area following construction. Further, the proposed crossings at Drainage A and Devereux Creek would be constructed using a board-walk style bridge that would be natural in character and would not substantially detract from the views along the shared Coastal-Anza Trail. Further, the removal of non-native species, including fennel that blocks views of the ocean, would improve the public viewshed and enhance the native habitat in ESHAs. Therefore, these improvements may result in minor long-term beneficial impacts to visual resources within the Project area.

Hollister Avenue is a designated Local Scenic Corridor (refer to Figure 6-1 in the GP/CLUP), which provides scenic views of the mountains and ocean. Implementation of the proposed Project would result in temporary trail construction and habitat restoration activities that would be visible from this vantage point.

b) The Project area does not contain any rock outcroppings or historic buildings within a state scenic highway; however, it does contain drainage courses as well as a number of native and non-native trees. The proposed Project would result in the removal or trimming of a number of non-native tree species. Additionally, herbicide would be applied to a Monterey cypress (*Cupressus macrocarpa*) tree within the entrenched Beach Access Point F and immature eucalyptus trees (i.e., saplings) at Beach Access Point E would be extensively trimmed in order to remove the existing asphalt. However, no native tree species or mature eucalyptus would be removed as a part of the proposed Project.

Additionally, the views of drainage courses within the Project area would not be substantially altered. The design principles for the proposed crossings utilize natural and non-intrusive structures that would not require handrails. Consequentially, while these crossings would provide safe access for trail users they would not be visible from a distance and would not impacts views of Devereux Creek or its tributaries.

Further, native species, including native trees and riparian vegetation would be planted as a part of restoration proposed within the Project area. Approximately 13 acres of restoration is proposed within the trail corridors, the drainage crossings, borrow pits, and the bluff areas, including a small 0.4-acre Coast Live Oak (*Quercus agrifolia*) woodland south of Devereux Creek. Eradication of the fennel and other non-native plants and

revegetation with low-growing coastal plant species native to the Ellwood Open Space Plan Area would enhance the visitor experience at Ellwood Mesa, resulting in overall beneficial impacts to visual resources within the Project area.

c) As previously described, pursuant to direction received during the public outreach meetings, the design principles for the proposed Project emphasize minimal change and maintenance of the natural setting that characterizes Ellwood Mesa. Consequently, the proposed Project emphasizes improvements to existing trails, which would generally not constitute a substantial change in its existing visual character. The proposed gully and creek crossings would utilize designs allowing for safe pedestrian passage while appearing as non-intrusive and natural as possible. The Project proposes the use of culvert and fill material, gradually sloping the trail down to the Gully A crossing and then back up, to reduce visibility and eliminate the need for handrails. Two locations, across Drainage A and Devereux Creek, would use boardwalk-style bridge crossings to facilitate accessibility, minimize the need for extensive engineering, and preserve a natural aesthetic trail design. Use of screw-piling design would allow for the construction of lower profile boardwalks approximately 18-24 inches above ground level, eliminating the need for handrails, and reducing the prominence of the crossings. The proposed steps at Beach Access Point F would replace the existing entrenched access in this location. As described previously, the steps would be constructed using sawn wood and decomposed granite filler in order to create a natural aesthetic that would be consistent with the character of Ellwood Mesa. Consequently, implementation of the proposed Project would have a less than significant impact on the existing visual character of the Project area.

d) The proposed Project would not introduce any new sources of light or glare that would affect daytime or nighttime views in the Project area. All engineered crossings and beach access point improvements would utilize wood or other non-reflective construction materials that would improve safety for trail users while maintaining the natural character of the Project area.

Cumulative Impacts

Implementation of the proposed Project would result in localized, short-term construction-related impacts to visual resources. Long-term impacts to visual resources would be beneficial and would not contribute considerably to any adverse cumulative impacts with regard to visual resources.

Required Mitigation Measures

As the impacts associated with aesthetics and visual resources are considered less than significant, no mitigation measures are required or recommended.

Residual Impacts

Under implementation of the proposed Project, residual impacts associated with aesthetics and visual resources would remain less than significant.

Agricultural Resources

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Convert Prime Farmland, Unique Farmland, or farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				×	
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?				×	
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?				×	

Note: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resource, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project; and forest carbon measurement methodology provide in Forest Protocols adopted by the California Air Resources Board (CARB).

Existing Setting

Portions of the Ellwood Mesa Open Space Plan Area were historically used to cultivate eucalyptus trees (as evidenced by the remnant groves) that were intended to be used as pier pilings in the early 1900s by Ellwood Cooper (Tompkins 1976). Additionally, Ellwood Mesa has been used as rangeland and to grow crops, including dry farming. This trend began with the arrival of the Spanish missionaries in the late 1700s, escalated in the mid- to late-1800s, involved the conversion of wetlands to agriculture in the early- to mid-1900s, and ended by the mid- to late-1960s when urbanization and development in the area effectively removed any remaining agricultural operations from the subject area (City of Goleta 2004).

No active agricultural operations have existed for over four decades on the Project site and there are no designated Prime Farmland or lands under Williamson Act contracts present in the Project area.

Thresholds of Significance

A significant impact to agricultural resources would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additionally, a project may pose a significant environmental effect on agricultural resources if it conflicts with adopted environmental plans and goals of the City or converts prime agricultural land to non-agricultural use or impairs the agricultural productivity of prime agricultural land.

Project Specific Impacts

a) The proposed Project area would not convert farmland to non-agricultural use. The proposed trail improvements and habitat restoration would be consistent with the area's land use designation for recreation (City of Goleta 2004).

b) The proposed Project would not conflict with existing zoning for agricultural use or a Williamson Act contract (City of Goleta 2004).

c) The proposed Project would not involve changes in the existing environment, which could result in conversion of farmland to non-agricultural use (City of Goleta 2004).

Eucalyptus trees were cultivated on Ellwood Mesa during the early 1900s; however, due to their irregular grain, the trees were not particularly suitable for construction projects.

Cumulative Impacts

Implementation of the proposed Project would not result in any adverse impacts associated with agricultural resources. Therefore, the proposed Project would not contribute to any cumulatively considerable impacts to agricultural resources.

Required Mitigation Measures

There are no impacts associated with agricultural resources and therefore, no mitigation measures are required or recommended.

Residual Impacts

Under implementation of the proposed Project, residual impacts associated with agricultural resources would remain less than significant.

Air Quality

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Conflict with or obstruct implementation of the applicable air quality plan?			×		
b) Violate any air quality standard or contribute substantially to an existing or project air quality violation?			×		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			×		
d) Expose sensitive receptors to substantial pollutant concentrations?			×		
e) Create objectionable odors affecting a substantial number of people?				×	

Note: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Existing Setting

Climate

The City of Goleta is characterized by a Mediterranean climate with warm summers, mild winters, and moderate rainfall totaling approximately 21 inches annually (National Climatic Data Center [NCDC] 2011). Average temperatures during the summer range from approximately 59 degrees Fahrenheit (°F) to 74 °F and average temperatures during the winter range from 48 °F 66.1 °F (NCDC 2011). Almost all precipitation occurs between November and April; however, during these months, the weather is generally sunny for a majority of the time. Cyclic land and sea breezes are the primary factors influencing the region's mild climate. The daytime winds are normally sea breezes, predominantly from the west, that flow at relatively low velocities. Additionally, cool, humid, marine air causes frequent fog and low clouds along the coast, generally during the night and morning hours in the late spring and early summer (City of Goleta 2004).

Criteria Pollutants

Air quality at a given location can be described by the concentration of various pollutants in the atmosphere. The criteria pollutants of primary concern include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter less than ten microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). Also regulated are sulfates, lead, hydrogen sulfide (H_2S), and vinyl chloride. Ozone air pollution is formed when nitrogen oxides (NO_x) and reactive organic compounds (ROCs) react in the presence of sunlight. According to the Santa Barbara County Air Pollution Control District (SBCAPCD), the

major sources of ozone precursor emissions in Santa Barbara County are motor vehicles, the petroleum industry, and solvent usage (paints, consumer products, and certain industrial processes). Sources of PM_{10} include grading, demolition, agricultural tilling, road dust, mineral quarries, and vehicle exhaust (City of Goleta 2012b).

Ambient Air Quality Standards

The U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established federal and state ambient air quality standards as well as emergency episode criteria for various pollutants. Air quality standards are set at concentrations that provide a sufficient margin of safety to protect public health and welfare. The significance of a pollutant concentration is determined by comparing the concentration to an appropriate federal or state ambient air quality standard.

The SBCAPCD is in attainment for all criteria pollutants under federal standards; however, the County continues to exceed the California 8-hour ozone standard as well as the state standard for PM_{10}. Santa Barbara County is therefore a non-attainment area for these criteria pollutants.

Table 3: Federal and State Air Quality Criteria

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone (O_3)	8 hour	0.070 ppm	N	0.075 ppm	U/A
	1 hour	0.09 ppm (180 µg/m^3)	-	-	-
Carbon monoxide (CO)	8 hour	9.0 ppm (10 mg/m^3)	A	9.0 ppm (10 mg/m^3)	A
	1 hour	20.0 ppm (23 mg/m^3)	A	35.0 ppm (40 µg/m^3)	A
Nitrogen dioxide (NO_2)	annual average	0.030 ppm (56 µg/m^3)	A	53 ppb	U/A
	1 hour	0.18 ppm (338 µg/m^3)	A	100 ppb	U/A
Sulfur dioxide (SO_2)	annual average	-	-	Revoked	-
	24 hour	0.04 ppm (105 µg/m^3)	A	Revoked	-
	1 hour	0.25 ppm (655 µg/m^3)	A	75 ppb	-
Particulate matter (PM_{10})	annual arithmetic mean	20 ug/m3	N	Revoked	A
	24 hour	50 µg/m^3	N	150 µg/m^3	A
Particulate matter ($PM_{2.5}$)	annual arithmetic mean	12 µg/m^3	U	15 µg/m^3	U/A
	24 hour	-	-	35 µg/m^3	U/A
Sulfates	24 hour	25 µg/m^3	A	-	-

Pollutant	Averaging Time	California Standards		National Standards	
		Concentration	Attainment Status	Concentration	Attainment Status
Lead (Pb)	calendar quarter	-	-	1.5 µg/m^3	A
	30 day average	1.5 µg/m^3	A	-	-
	rolling 3-month average	-	-	0.15 µg/m^3	U
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m^3)	A	-	-
Vinyl chloride (chloroethene)	24 hour	0.010 ppm (26 µg/m^3)	-	-	-
Visibility reducing particles	8 hour (1000 to 1800 PST)	-	A	-	-

Notes:

Units
mg/m^3 – milligrams per cubic meter
ppb – parts per billion
ppm – parts per million
µg/m^3 – micrograms per cubic meter

Attainment Status
A – Attainment
N – Nonattainment
U – Unclassified
U/A – Unclassifiable/Attainment

Source: SBCAPCD 2012.

Air Quality Planning

State and federal regulations require that jurisdictions that do not meet clean air standards develop plans and programs that will bring those areas into compliance. These plans contain emission reduction measures and attainment schedules to meet specified deadlines. The 2010 Clean Air Plan (CAP), which was adopted as the Santa Barbara County portion of the State Implementation Plan (SIP), is designed to meet and maintain federal clean air standards (SBCAPCD 2010). The adopted 2010 CAP incorporates updated data and is currently the most recent plan aimed at meeting the state ozone standard (SBCAPCD 2010).

Thresholds of Significance

A significant air quality impact could occur if the project resulted in any of the impacts noted in the above checklist (a-e). In addition, per the City's Thresholds Manual, a significant air quality impact could occur, if the project would:

f) Interfere with progress toward the attainment of the ozone standard by releasing emissions which equal or exceed the established long-term quantitative thresholds for NO_X and ROC (same as reactive organic gases [ROG]). Thresholds are 25 pounds per day (lbs/day) of either NOX or ROC;

g) Equal or exceed the state or federal ambient air quality standards for any criteria pollutant (as determined by modeling);

h) Result in toxic or hazardous air pollutants in amounts which may increase cancer risks for the affected population.

SBCAPCD Thresholds

The following significance thresholds have been established by the SBCAPCD (SBCAPCD 2011). While the City of Goleta has not yet adopted any new threshold criteria, these SBCAPCD thresholds are considered appropriate for use as a guideline for the impact analysis. SBCAPCD Operational Impacts Threshold: The project would result in a significant impact, either individually or cumulatively, if it would:

1) Emit 240 pounds/day or more of ROG (same as ROC) and NO_x from all sources;

2) Emit 25 lbs/day or more of unmitigated ROG from any motor vehicles trips only;

3) Emit 25 lbs/day or more of unmitigated NO_X from any motor vehicle trips only;

4) Emit 80 lbs/day or more of PM_{10};

5) Cause or contribute to a violation of any California or Ambient Air Quality standard (except ozone);

6) Exceed the SBCAPCD health risk public notification thresholds adopted by the APCD Board (ten excess cancer cases in a million for cancer risk and a Hazard Index of more than 1.0 for non-cancer risk); or

7) Be inconsistent with Federal or State air quality plans for Santa Barbara County.

The cumulative contribution of project emissions to regional levels should be compared with existing programs and plans, including the most recent Clean Air Plan (SBCAPCD 2010). Due to the County's non-attainment status for ozone and the regional nature of ozone as a pollutant, if a project's emissions from traffic sources of either of the ozone precursors (NO_x or ROC), exceed the operational thresholds, than the project's cumulative impacts are considered significant. For projects that do not have significant ozone precursor emissions or localized pollutant impacts, if emissions have been taken into account in the 2010 CAP growth projections, regional cumulative impacts may be considered to be less than significant.

SBCAPCD Construction Impacts Thresholds

Quantitative thresholds of significance are not currently in place for short-term emissions. However, short-term impacts such as exhaust emissions from construction equipment and fugitive dust generation during grading must be discussed. In the interest of public disclosure, the SBCAPCD recommends that construction-related NO_x, ROC, PM_{10}, and $PM_{2.5}$ emissions from diesel and gasoline powered equipment, paving, and other activities be quantified. The SBCAPCD uses 25 tons per year for NO_x and ROC as a guideline for determining the significance of construction impacts.

Under SBCAPCD Rule 202 D.16, if the combined emissions from all construction equipment used to construct a stationary source, which requires an Authority to Construct permit, have the potential to exceed 25 tons of any pollutant, except carbon monoxide, in a 12-month period, the permittee shall provide offsets under the provisions of SBCAPCD Rule 804 and shall demonstrate that no ambient air quality standard will be violated. SBCAPCD Rule 345 regulates generation of visible fugitive dust emissions at demolition and construction sites.

Project Specific Impacts

The City's methodology for quantifying criteria pollutant emissions relies upon the URBEMIS 2007 (version 9.2.4) air quality modeling software for identifying short-term construction and long-term operational impacts for the pounds/day unmitigated condition.

Construction Related Impacts

a, b) Short-term construction-related air quality impacts generally occur during Project grading activities. Preliminary earthwork quantities for the proposed Project are estimated at 900 cubic yards of cut and 900 cubic yards of fill, with approximately 15 cubic yards of exported material (i.e., asphalt proposed for removal from Beach Access Point E and potentially removed from the site if not suitable as fill). As a result, PM_{10} associated with construction grading is estimated to be approximately 37 lbs/day. Construction-related ROC and NO_x emissions associated with the proposed Project are estimated to be approximately 12 lbs/day and 71 lbs/day respectively (please refer to Attachment 2, URBEMIS daily summer emission summary). Neither the City of Goleta nor the SBCAPCD has adopted any significance thresholds for construction-generated ROC, NO_x, or PM_{10}. However, these emissions have been incorporated into the 2010 CAP in terms of the overall emissions inventory for construction activities. Therefore, air quality impacts associated with Project construction are considered adverse, but less than significant. Further, construction-related air quality impacts would be minimized with the implementation of MM AQ-1, -2, and -3, which would reduce PM_{10} emissions as well as equipment exhaust and diesel exhaust emissions and pollutants.

d) Fine particulate emissions from diesel equipment exhaust are classified as carcinogenic by the State of California. The CARB has conducted numerous studies which indicate that diesel particulate emissions from diesel engines pose a health risk to sensitive receptors. PM_{10} exhaust emissions for heavy equipment involved in Project construction, including a small haul truck (e.g., standard bed diesel pick-up truck) exporting fill, are estimated at approximately 8.9 lbs/day. Such temporary Project-generated diesel particulate emissions are not considered substantial and, as such, the health risk caused by construction related particulate emissions would be considered adverse but less than significant for sensitive receptors, including the nearby Ellwood Elementary School.

e) There would be no new paving or other sources of objectionable odors during construction associated with the proposed Project.

Long-term Operational Impacts

a, b) There would be no anticipated long-term changes associated with use of the California Coastal Trail or Anza Trail. The number of parking spaces providing access to the Project area would remain unchanged and no other growth inducing measures would be implemented as part of the proposed Project. Consequently, there would be no substantial changes to long-term operational impacts associated with open space users accessing Ellwood Mesa. Further, no point-sources of air emissions would be installed as a result of the proposed Project. Therefore, no long-term operational impacts to air quality would result from implementation of the proposed Project.

d) As the proposed Project would not introduce any new sources of operational emissions, there would be no long-term change in the exposure of sensitive receptors to pollutant concentration.

Cumulative Impacts

c) Implementation of the proposed Project would result in short-term localized, construction-related impacts to air quality. However, these impacts would be less than significant and would be further reduced with the implementation of MM AQ-1, -2, and -3, which would reduce PM_{10} emissions as well as equipment exhaust and diesel exhaust emissions and pollutants. Further, implementation of the proposed Project would not result in long-term operational emissions. Consequently, these impacts would not result in cumulatively considerable impacts to air quality.

Required Mitigation Measures

These mitigation measures are required for all projects involving earthmoving activities regardless of the project size or duration. The measures are based on policies adopted in the 1979 Air Quality Attainment Plan for Santa Barbara County. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions (SBCAPCD 2011).

MM AQ-1 ***PM_{10} Minimization****: Dust generated during short-term trail construction activities associated with the proposed Project must be kept to a minimum consistent with the requirements of the SBCAPCD.*

- *During construction, a water truck (i.e., a light pickup truck with an attached water tank) should be used for water suppression. This vehicle should be kept in a designated staging area. Water spraying must be used regularly to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 miles per hour (mph). Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.*

- *Minimize amount of disturbed area and reduce on site vehicle speeds to 15 mph or less.*

- *If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than two days must be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site must be tarped from the point of origin.*

- *Gravel pads must be installed at all access points to prevent tracking of mud onto public roads.*

- *After clearing, grading, earth moving, or excavation is completed, disturbed must be treated area by watering, or revegetation, or by spreading soil binders until the area is paved or otherwise developed so that dust generation must not occur.*

- *The City must designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. The monitor(s) must also ensure that the watering truck is kept at the proper staging area when not in use. Their duties must include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons must be provided to the SBCAPCD prior to land use clearance for project grading.*

- *Prior to land use clearance, the applicant must include these dust control requirements as a note on a separate informational sheet to be recorded with a map. All requirements must also be shown on grading plans.*

MM AQ-2 ***Equipment Exhaust Minimization****: As required by APCD for all construction projects, the following regulatory requirements and control strategies, required by state law, must be adhered to throughout grading, hauling, and trail construction activities:*

- *Diesel-powered construction equipment must be registered with the state's portable equipment registration program or have an APCD permit.*

- *Mobile construction equipment is subject to the CARB Regulation for In-use Off-Road Diesel Vehicles (Title 13 California Code of Regulations [CCR], Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter and criteria pollutant emissions from in use off-road diesel-fueled vehicles.*

- *Commercial diesel vehicles are subject to Title 13 CCR § 2485, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading must be limited to five minutes; electric auxiliary power units should be used whenever possible.*

  Plan Requirements and Timing: Prior to issuance of either a grading permit or land use permit, these required air quality mitigation measures must be included on final development plans submitted to the City for review and approval. All requirements must be conveyed to trail construction crews by the City during a pre-construction meeting held at the site prior to any site preparation activities.

  Monitoring: City staff must hold a pre-construction meeting prior to any construction activity. Additionally, City compliance staff must periodically monitor for compliance with these requirements.

<u>Recommended Mitigation Measures</u>

MM AQ-3 ***Reduction of Diesel Exhaust Pollutants****: The following recommended control strategies should be implemented to the maximum extent feasible in order to minimize diesel exhaust per SBCAPCD requirements:*

- *Diesel construction equipment meeting the CARB Tier 1 emission standards for off-road heavy-duty diesel engines must be used. Equipment meeting*

CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.

- *Diesel-powered equipment should be replaced by electric equipment whenever feasible.*
- *If feasible, diesel construction equipment should be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by USEPA or California.*
- *Catalytic converters should be installed on gasoline-powered equipment, if feasible.*
- *All construction equipment should be maintained in tune per the manufacturer's specifications.*
- *The engine size of construction equipment should be the minimum practical size.*
- *The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.*
- *Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.*

Residual Impacts

Implementation of the proposed Project would result in short-term, construction-related impacts, which would be considered adverse, but less than significant with the incorporation of MM AQ-1, -2, and -3, which would reduce PM_{10} emissions as well as equipment exhaust and diesel exhaust emissions and pollutants. Consequently, under implementation of the proposed Project, residual impacts to air quality would remain less than significant.

Biological Resources

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		×			

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		×			
c) Have a substantial adverse effect on 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?			×		
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			×		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			×		
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan			×		

Existing Setting

Due to historic land uses, the Ellwood Mesa Open Space Area is dominated primarily by non-native annual grassland, which covers approximately 120 acres. Characteristic non-native grass species within the Project area include wild oats (*Avena* sp.), ripgut grass (*Bromus diandrus*), barley (*Hordeum* sp.), and fescue (*Vulpia* sp.). However, Ellwood Mesa also contains extensive stands of native grasses as well as over 40 vernal pools that occur within these grasslands (City of Goleta 2004; Storrer Environmental Services 2012). Eucalyptus woodlands bound the site on the north, east, and west, and three small stands of eucalyptus woodland occur along the top of the bluff above the Pacific Ocean. Devereux Creek bisects the Ellwood Mesa Open Space from west to east and is vegetated by freshwater marsh, riparian scrub, ruderal (e.g., fennel, iceplant, mustard, radish), and a small patch of riparian forest. Additionally, the coastal bluffs are vegetated with a moderately dense growth of coastal bluff scrub and non-native grasslands.

The Ellwood Mesa Open Space Plan area includes the Ellwood North Grove, Ellwood West, and Ellwood Main Grove monarch butterfly aggregation sites and the Sandpiper monarch butterfly roost. The Ocean Meadows autumnal roost occurs along the eucalyptus windrow on

the eastern boundary of Ellwood Mesa (City of Goleta 2004). In addition to the monarch aggregation sites, numerous raptor roosts and nests also occur within the eucalyptus woodlands (City of Goleta 2004; Storrer Environmental Services 2012). Southern tarplant, a CRPR 1B.1 species, likely occurs within the vernal pools on the mesa and the grasslands likely support foraging habitat for special-status bats and birds. The western snowy plover (*Charadris alexandrines nivosus*) has federally designated critical habitat on the beach below the Ellwood Mesa Open Space and is likely to forage in the intertidal areas near the open space. Additionally, western snowy plovers are known to breed and winter on beaches immediately southeast of the Ellwood Mesa Open Space at Coal Oil Point.

Sensitive Habitats

While the Project area is dominated by non-native annual grassland, it also includes a number of ESHAs primarily concentrated along the eastern end of the mesa as well as along the bluff edge and including the eucalyptus groves to the north. These habitat communities, described below, particularly the southern vernal pool and eucalyptus woodlands, support a number of sensitive wildlife species (see Figure 6).

Southern Vernal Pool. Vernal pools form as winter rains fill topographic depressions where underlying claypan layers prevent the water from percolating through to the subsurface (County of Santa Barbara 1992; Thompson 1981). Eventually these pools become dry due to subsurface drainage, evaporation, and plant evapotranspiration, remaining dry throughout the summer until late fall and winter rains again initiate pool formation. Vernal pools within the Project area, which are located throughout the flat mesa, are generally small in area, only a few inches deep, and are dominated by ephemeral annual and perennial hydrophytes such as wooly heads (*Psilocarphus brevissimus*), coyote thistle (*Eryngium vaseyi*), common spikerush (*Eleocharis macrostachya*), and lowland cudweed (*Gnaphalium palustre*) (City of Goleta 2004).

Native Grassland. Native grasslands usually occur on fine-textured (often clay) soils, moist or even waterlogged during the winter, but very dry in the summer. Historically, native grasslands were much more widespread throughout California. However, the introduction of non-native grasses and forbs (i.e., wildflowers), livestock grazing, and alteration of the community's natural fire regime have resulted in the displacement of native bunchgrass, other native grasses, and forbs by introduced species. Five native grass species occur in the Project area and include alkali rye (*Leymus triticoides*), purple needlegrass (*Nassella pulchra*), meadow barley (*Hordeum brachyantherum*), blue wild rye (*Elymus glaucus*), and California brome (*Bromus carinatus*). Purple needlegrass is the most common native grass and generally grows in relatively pure stands, occasionally intermixing with other native grass species, particularly meadow barley. Native grasslands within the Project area cover approximately 33.5 acres, with a particularly extensive stand of purple needlegrass located along the eastern end of Ellwood Mesa (City of Goleta 2004).

Southern Coastal Bluff Scrub. This plant community includes dwarf shrubs, herbaceous perennials, and annuals with a varying degree of succulence (Holland 1986). It occurs on exposed bluffs characterized by nearly constant wind with high salt and moisture content. The dominant species within the Project area include Brewer's saltbush (*Atriplex lentiformis* ssp. *breweri*), lemonade berry (*Rhus integrifolia*), and seashore blite (*Suaeda californica* var. *taxifolia*). Other representative native species include coyote brush, sagebrush (*Artemisia* spp.), haplopappus (*Haplopappus venetus*), and seacliff buckwheat (*Eriogonum parvifolium* var. *parvifolium*). Portions of the coastal bluff habitat have been degraded by foot and bicycle traffic where a number of trails provide access to the beach. This disturbed area supports non-native

species including fennel, pampas grass (*Cortaderia jubata*), iceplant, and New Zealand spinach (*Tetragonia tetragonioides*) (City of Goleta 2004).

Eucalyptus Woodland. Eucalyptus woodland is a non-native habitat community dominated by an invasive tree introduced to southern California from Australia. Large stands of mature eucalyptus trees, including blue gum (*Eucalyptus globulus*), lemon-scented gum (*Eucalyptus maculata* var. *citriodora*), and red ironbark (*Eucalyptus sideroxylon*), occur within the Project area and comprise winter roosting sites for monarch butterflies. Eucalyptus woodland also forms small stands of wind-sculpted trees on the blufftops (City of Goleta 2004).

Eucalyptus woodland habitat is located immediately to the east of the shared Coastal-Anza Trail and just south of the housing developments to the east. These groves provide habitat for a number of special status species, including various raptors and monarch butterflies.

Southern Riparian Scrub. Southern riparian scrub is often found in very dense thickets adjacent to creeks and ponded areas, and in less dense stands near seeps and areas with high water tables. This habitat is usually associated with areas of loose, sandy alluvium, and requires frequent flooding or scouring to prevent succession to a riparian forest dominated by cottonwoods and sycamores. This habitat occurs along Devereux Creek, tributaries to Devereux Creek, drainage ditches, and gullies, and Phelps Ditch. Dominant species include arroyo willow (*Salix lasiolepis*) shrubs with occasional patches of mule fat (*Baccharis salicifolia*), Himalaya blackberry (*Rubus discolor*), canary grass (*Phalaris canariensis*), bristly ox-tongue (*Pichris echioides*), rabbitsfoot grass (*Polypogon monspeliensis*), and curly dock (*Rumex crispus*).

Jurisdictional Water Bodies

Drainage A. Drainage A is a tributary to Devereux Creek on the Ellwood Mesa property conveying most of the water from the northern portion of the property south to Devereux Creek. At the proposed trail crossing, Drainage A consists of an ephemeral drainage within an approximately 25-30-foot-wide channel with steep banks approximately 6-10 feet deep. In addition to the main drainage channel, a small internal two-foot wide drainage cuts through the wider Drainage A. No vegetation occurs within the six-foot wide trail that currently crosses Drainage A as this area is heavily disturbed by ongoing trail use. The area adjacent to the channel above the top of bank did not display any wetland features. Dominant vegetation above the top of bank adjacent to the Drainage A channel consists of upland grasses and interspersed shrubs including slender oat (*Avena barbara*), compact brome (*Bromus rubens*), bull grass (*Bromus hordeaceus*), rat's-tail fescue (*Vulpia myuros*), ripgut brome *(Bromus diandrus*), and coyote brush, (*Baccharis pilularis*).

Drainage A has a defined channel bed and banks; however, the mean high water line in the vicinity of the proposed crossing was identified to be the two foot wide by two foot deep channel located within the broader erosional feature. This small channel feature contained sediment deposits and drift deposits; no hydrology indicators were identified within the broader banks of Drainage A in the vicinity of the proposed crossing. While Drainage A in the vicinity of the proposed crossing does not support riparian vegetation and does not contain hydric soils, it is

still considered a wetland using California Coastal Commission (CCC) one parameter criteria (AMEC Environment & Infrastructure, Inc. [AMEC] 2013 [unpublished]).

Devereux Creek. Devereux Creek is a large, intermittent, flat-bottomed drainage with defined bed and banks. Water runs off slowly, and several low spots along the drainage hold ponded water for a short period of time. The majority of Devereux Creek on Ellwood Mesa is vegetated with wetland plants. Areas that support wetland vegetation meet the California Department of Fish and Wildlife (CDFW) and CCC wetland criteria.

This creek has a clearly defined channel bed, has intermittent flow at least seasonally, supports substantial riparian vegetation, and has a watershed that extends from the Sandpiper Golf Course to the Devereux Lagoon. Devereux Creek would be considered jurisdictional by CCC, CDFW, and USACE. This creek is a major water feature on Ellwood Mesa and would require minimum buffers of 100 feet, as described in Policies CE 1.6 and CE 2.3 of the Local Coastal Plan (LCP), and would also be under the appeals jurisdiction of CCC (AMEC 2013 [unpublished]).

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Biological Resources

FIGURE 6

Wildlife

The Ellwood Mesa Open Space Plan Area provides habitats for white-tailed kites and includes approximately 11 nests that have been active as recently as 1997. (Photograph courtesy of USFWS)

The Project area supports a variety of wildlife species typical of coastal ecosystems. Common bird species found in upland habitats on Ellwood Mesa include black phoebe (*Sayornis nigricans*), western kingbird (*Tyrannus verticalis*), cliff swallow (*Petrochelidon pyrrhonota*), American crow (*Corvus brachyrhynchos*), western scrub jay (*Aphelocoma coerulescens*), and northern mockingbird (*Mimus polyglottos*). Additionally, many raptor species such as white-tailed kite (*Elanus leucurus*), red-tailed hawk (*Buteo jamaicensis*), Cooper's hawk (*Accipiter cooperi*), American kestrel (*Falco sparverius*), barn owl (*Tyto alba*), and great horned owl (*Bubo virginianus*) forage within the grassland habitats within the Project area (Storrer and Philbrick 1998). Because the southern border of the Project area abuts the Pacific Ocean, a variety of shorebirds and pelagic birds also occur within the vicinity of the Project area, including such common species as western gull (*Larus occidentalis*), western grebes (*Aechmophorus occidentalis*), spotted sandpiper (*Actitis macularia*), and willet (*Catoptrophorus semipalmatus*). The federally threatened western snowy plover nests on the beach near the mouth of Devereux Slough, approximately 0.75 miles to the southeast.

Urban areas and transportation corridors have created barriers to dispersal for terrestrial wildlife, especially for medium and large carnivores; however, small mammal diversity is relatively high due to the expanse of open grassland and shrubland in the Project area (City of Goleta 2004). Small mammals commonly occurring at Ellwood Mesa include Botta's pocket gopher (*Thomomys bottae*), California ground squirrel (*Spermophilus beecheyi*), western harvest mouse (*Reithrodontomys megalotis*), house mouse (*Mus musculus*), and California vole (*Microtus californicus*) (Storrer and Philbrick 1998; Storrer Environmental Services 2012). Additionally, reptiles and amphibians that occur within the Project area include Pacific chorus frog (*Pseudacris regilla*), southern alligator lizard (*Gerrhonotus multicarinatus*), western skink (*Eumeces skiltonianus*), and western fence lizard (*Sceloporus occidentalis*) (Storrer and Philbrick 1998; Storrer Environmental Services 2012).

Wildlife Movement

Devereux Creek and its northern tributaries are the last remaining physical linkages between the Ellwood Mesa Open Space Area and relatively undisturbed and unfragmented habitats to the north. However, these linkages are tenuous and may serve only as semi-permeable movement corridors for many species (City of Goleta 2004). The Project area is likely large enough to allow populations of common species to persist; however, in general, populations of small vertebrates in the Project area, such as amphibians, reptiles, and small mammals, may experience dramatic seasonal and annual fluctuations. Populations of medium- to large-size carnivores, such as striped skunk (*Mephitis mephitis*), raccoon (*Procyon lotor*), opossum (*Didelphis virginianus*), bobcat (*Lynx rufus*), and coyote (*Canis latrans*) are small and probably could not persist in the Project area without dispersal from outside areas. However, these species have relatively high reproductive rates and can survive in urbanized or otherwise disturbed environments. Movement of these species between foothill and mountain regions and

the Project area occurs via the narrow and fragmented habitat linkages provided by Devereux Creek infrequently because there are many intervening barriers to dispersal, such as transportation corridors, associated culvert undercrossings and residential development. Although bird flyways are not traditionally considered wildlife movement corridors, Devereux Slough, located southeast of the Project area, is an important habitat for bird species during migration along the Pacific Flyway. Many bird species use this area as an annual stopover location for several days of rest and feeding prior to continuing migration to their seasonal destination (City of Goleta 2004). Ellwood Mesa is also part of the Goleta Coast Important Bird Area, designated by the National Audubon Society. It is considered to be globally important due to its location on the Pacific Flyway.

Special Status Species

Several special-status wildlife species are known to occur in the vicinity of the Project area. The table below includes known occurrences of special status species within the Dos Pueblos Canyon 7.5-minute Quadrangle (California Department of Fish and Wildlife [CDFW] 2013). Species that are documented or have a high potential to occur within the Project area are described in more detail in the species accounts that follow the table.

Table 4: Special Status Species within the Vicinity of the Project Site

Common Name	Species Name	Federal Status	State Status	State Rank	CNPS Rank
Invertebrates					
globose dune beetle	*Coelus globosus*	-	-	S1	-
monarch butterfly	*Danaus plexippus*	-	-	S3	-
sandy beach tiger beetle	*Cicindela hirticollis gravida*	-	-	S1	-
Fish					
tidewater goby	Eucyclogobius newberryi	E	SSC	S2S3	-
Amphibians					
California red-legged frog	*Rana draytonii*	T	SSC	S2S3	-
Reptiles					
western pond turtle	*Emys marmorata*	-	-	S3	-
Birds					
ferruginous hawk	*Buteo regalis*	-	-	S3S4	-
western snowy plover	*Charadrius alexandrinus nivosus*	T	SSC	S2	-
white-tailed kite	*Elanus leucurus*	-	FP	S3	-
Plants					
black-flowered figwort	*Scrophularia atrata*	-	-	S2.2	1B.2

Common Name	Species Name	Federal Status	State Status	State Rank	CNPS Rank
Contra Costa goldfields	*Lasthenia conjugens*	E	-	S1	1B.1
mesa horkelia	*Horkelia cuneata var. puberula*	-	-	S2.1	1B.1
Santa Barbara honeysuckle	*Lonicera subspicata* var. *subspicata*	-	-	S2	1B.2
southern tarplant	*Centromadia parryi* ssp. *australis*	-	-	S2	1B.1
white-veined monardella	*Monardella hypoleuca* ssp. *hypoleuca*	-	-	S2S3	1B.3

FEDERAL STATUS

E = Endangered = Danger of extinction throughout range
T = Threatened = Likely to become endangered in foreseeable future throughout range

STATE STATUS

E = Endangered = Applies to a species whose survival and reproduction in the wild are in immediate jeopardy from one or more causes
T = Threatened = Applies to a species that is existing in small numbers throughout all or a significant portion of its range that it may become endangered
SSC = Species of Special Concern = California Department of Fish and Wildlife Species of Special Concern
FP = Fully Protected = Fully protected under the California Endangered Species Act

STATE RANKING from California Natural Diversity Database

S1 = Critically Imperiled = Critically imperiled in the state because of extreme rarity or because of factor(s) making it especially vulnerable to extirpation from the state
S2 = Imperiled = Imperiled in the state because of rarity due to factors making it very vulnerable to extirpation from the state
S3 = Vulnerable = Vulnerable in the state due to factors making it vulnerable to extirpation from the state

CNPS RANKING

1B = Plants rare, threatened, or endangered in California and elsewhere
0.1 = Seriously Threatened in California = Over 80% of occurrences threatened/high degree and immediacy of threat
0.2 = Fairly Threatened in California = 20%- 80% occurrences threatened/high degree and immediacy of threat
0.3 = Not Very Threatened = <20% of occurrences threatened/low degree and immediacy of threat or no current threat known

Source: CDFW 2013.

Southern Tarplant. Southern tarplant is an annual herb that germinates during spring and blooms between June and November. It has yellow, daisy-like flowers that occur primarily at the ends of its branches. Although not observed within the Project area, the southern tarplant occurs in the immediate vicinity, including populations at the Venoco Ellwood Marine Terminal and Ocean Meadows Golf Course. Suitable habitat, including southern vernal pools occur throughout the study area and consequently this species has a high potential to occur (City of Goleta 2004).

Under the proposed Project, southern tarplant would be reestablished on Ellwood Mesa as a part of habitat restoration. (Photograph courtesy of CNPS)

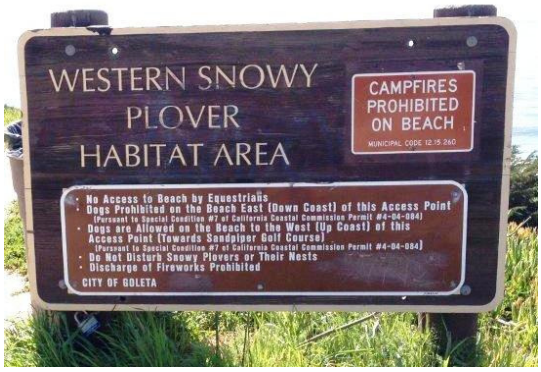
Globose Dune Beetle. The globose dune beetle is distributed in coastal dunes from British Columbia

southward to northwestern Baja California Norte, Mexico (Doyen 1976). Throughout most of its range, it is narrowly restricted to foredunes immediately bordering the ocean and is able to withstand frequent inundation of its substrates by sea water. Globose dune beetles occur in foredune habitats along the base of the bluff south of the Ellwood Mesa Open Space eastward to the Coal Oil Point Reserve.

Sandy Beach Tiger Beetle. The sandy beach tiger beetle is found in open, sandy coastal scrub and beach habitats near estuaries in central and southern California. The adults are carnivorous, feeding on flies and other insects in the high tide zone. The sandy beach tiger beetle has been found on the beach and dunes around the mouth of Devereux Slough on the Coal Oil Point Reserve (Sandoval 2003), and suitable foredune habitat also occurs at the base of the bluffs south of the Santa Barbara Shores and Ellwood Mesa Open Space.

Monarch Butterfly. Overwintering habitat for this species is protected under Policy CE 4 of GP/CLUP as an ESHA (City of Goleta 2006). Although the monarch butterfly is not threatened with extinction, its wintering sites are highly vulnerable to disturbance. The Ellwood Mesa Open Space Plan Area contains significant wintering habitat for the monarch butterfly. Eucalyptus groves create suitable microclimates due to the protection from winds afforded by the large trees, a relatively constant mild temperature, and a nectar source. Large stands of eucalyptus woodland form windrows on the western and eastern perimeter of Ellwood Mesa Open Space Plan Area. Other woodlands are located along Devereux Creek and its tributary through the Coronado Butterfly Preserve. The eucalyptus groves in the Comstock Homes Development (The Bluffs) and Ellwood Mesa Open Space Plan area are called the Ellwood Complex. Five monarch butterfly overwintering sites occur in the complex – Sandpiper Aggregation, Ellwood North, Ellwood West, Ellwood Main, and Ocean Meadows Roost. Approximately 50 acres of eucalyptus woodland in the Ellwood Complex support overwintering monarchs on a regular basis.

Western Snowy Plover. The snowy plover nests on sandy beaches and dunes by creating a shallow depression as a nest, using driftwood, rocks, or bushes as cover. This species has been in decline throughout California, in part due to human disturbance of sandy beaches typically used for nesting and roosting. Federally designated critical habitat occurs to the south of the Ellwood Open Space on Ellwood Beach. Additionally, one of the largest breeding populations in the state occurs along the beaches and dunes 0.5 miles east of Ellwood Mesa within the Coal Oil Point Preserve. The mouth of Devereux Slough and adjacent beaches to the west, are major wintering localities and nesting sites for this species (Sandoval 2003). This species occurs southeast of the Project area and forages along the beaches and intertidal areas fronting the Project area (City of Goleta 2004).



Western snowy plover breeding habitat is located to the southeast of Ellwood Beach at the Coal Oil Point Preserve. However, this species has federally designated critical habitat fronting the Project area and is also known to forage on the beaches and intertidal zone in this area.

Cooper's Hawk. Declines in Cooper's hawk populations are attributed to the loss of lowland riparian forests throughout California. Cooper's hawks occur as winter migrants and summer

breeders within Santa Barbara County and utilize the eucalyptus woodlands within the Project area. An active Cooper's hawk nest was documented in an eucalyptus tree on the eastern edge of the Project area in 2003 during field surveys associated with the Comstock Homes Development (The Bluffs). Consequently, this species has a high potential to occur within the Project area (Storrer Environmental Services 2012).

White-tailed Kite. The white-tailed kite is a state "Fully Protected" species and is protected under Policy CE 8 of the GP/CLUP (City of Goleta 2006). The species occurs as a year-round resident breeder in the Project area, which provides foraging, roosting, and nesting habitat. Roost and nest sites are typically communal and are generally occupied from one year to the next, so that local territories are maintained for several years. One or more kites are regularly observed foraging in grasslands and other open habitats in the Project area (Storrer 2003; Storrer Environmental Services 2012). Observations suggest that the Ellwood Mesa Open Space Plan Area serves as one of the primary foraging territories for kites nesting in the Devereux Slough area (Storrer 2003; Storrer Environmental Services 2012). Kites have also been recorded nesting in the eucalyptus trees within and surrounding the Project area (City of Goleta 2004; Storrer Environmental Services 2012).

Turkey Vulture. Communal turkey vulture (*Cathartes aura*) roost sites are designated ESHA under Policy CE 8 of the GP/CLUP (City of Goleta 2006). Small roosts occur within the large eucalyptus groves on Ellwood Mesa. Foraging territories typically encompass several miles. Turkey vultures are frequently observed foraging and/or roosting throughout the Project area (Storrer 2003; Storrer Environmental Services 2012).

Thresholds of Significance

A significant impact on Biological Resources would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additionally, per the City's *Environmental Thresholds & Guidelines Manual* a project would pose a significant environmental impact(s) on biological resources in any of the following would result from project implementation:

a) A conflict with adopted environmental plans and goals of the community where it is located;

b) Substantial effect on a rare or endangered plant or animal species;

c) Substantial interference with the movement of any migratory or resident fish or wildlife species;

d) Substantial diminishment of habitat for fish, wildlife, or plants.

Project Specific Impacts

a) Implementation of the proposed Project would include trail recontouring and the installation of drainage crossings as well as beach access point improvements. Additionally, the proposed Project would result in minor realignment of the shared Coastal-Anza Trail as well as the Anza Trail on the eastern end of the Project area. These Project components may have adverse direct or indirect construction-related impacts to a number of special-status species, including southern tarplant, monarch butterfly, federally threatened western snowy plover, and special status raptors.

Construction of the proposed trail realignments could result in the loss of habitat for the southern tarplant. Although this CRPR 1.B.1 plant species was not encountered during previous surveys associated with the Comstock Homes Development (The Bluffs), it is found less than one mile to the east and southeast of the Ellwood Mesa Open Space Area in similar habitat types. Additionally, trail improvements, including trail realignment per the GP/CLUP as well as the installation of drainage crossings, would occur in the immediate vicinity of raptor nests within the eucalyptus groves in the northern region of the Project area. This area includes a red-tailed hawk nest and two white-tailed kite nests near Devereux Creek, which would potentially be disturbed during construction activities. However, these impacts would be less than significant with the incorporation of MM BIO-1, which would require a sensitive species survey to reduce disturbance and direct impacts to these species.

Trail recontouring and drainage crossing construction would occur along the shared Coastal-Anza Trail immediately adjacent to the Ellwood Complex, a substantial monarch butterfly overwintering location. (Photography courtesy of the City of Goleta)

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

b) Implementation of the proposed Project would involve the realignment of trail segments per the GP/CLUP (refer to Figure 2). Construction of these trail segments would remove small areas of existing habitat within the corridor (see Table 5). However, implementation of the proposed Project would result in approximately 13 acres of total restoration adjacent to the trail corridor, which would result in mitigation at a 25:1 ratio (i.e., 25 acres of restored habitat for every acre of disturbed habitat).

Table 5: Vegetation Removal Associated with the Realigned Trail Segments

Habitat Type	Area of Vegetation Removal (Acres)
Coyote Bush Scrub	0.07
Disturbed Vegetation	< 0.01
Native Grassland	0.03

Habitat Type	Area of Vegetation Removal (Acres)
Non-Native Grassland	0.42
Venturan Coastal Sage Scrub	0.01

Note: Calculations include vegetation that would be removed as a part of the preferred option for the switchback following the Devereux Creek Crossing.

Trail construction along the edge of the eucalyptus grove to the north would involve work in designated ESHA habitat. Additionally, the construction of drainage crossings over Drainage A and Devereux Creek, as well as the proposed beach access point improvements, would also occur within designated ESHA habitat. However, implementation of the proposed Project is consistent with GP/CLUP policies regarding ESHA as resource restoration and enhancement projects are permitted within ESHA under Policy CE 1.6. Any incremental impacts to ESHAs as a result of trail recontouring would be mitigated onsite, consistent with Policy CE 1.7, through the implementation of the Restoration Plan included as a part of the proposed Project. Any potential adverse impacts associated with restoration planting would be reduced to less than significant levels with the implementation of MM BIO-2, which would establish native plant requirements. Additionally, the proposed Project would improve degraded ESHA habitat, including the blufftop habitat in the immediate vicinity of Beach Access Points E and F, which is characterized by surface water erosion and non-native plant species. Removal of native fill from the berms to the north of the blufftop trail would reduce surface water runoff, which currently contributes to blufftop erosion. Further, realignment of the Anza Trail on the eastern end of the Project site would relocate the existing trail, which currently passes through southern vernal pool habitat, to the north, outside of any designated ESHA. Consequently, implementation of the proposed Project would have less than significant construction-related impacts on ESHA as well as long-term beneficial impacts associated with habitat restoration and trail realignment.

c) Implementation of the proposed Project would include the construction of boardwalk style crossings over Drainage A and Devereux Creek as well as the installation of an 18-inch concrete culvert in Gully A. Gully A is not considered a jurisdictional wetland (AMEC 2013 [unpublished]); however, Drainage A and Devereux Creek have been delineated as jurisdictional wetlands (City of Goleta 2004; AMEC 2013 [unpublished]). Construction of a boardwalk style bridge over each of these drainages would result in approximately 0.01 acres of indirect impacts to wetland habitat in Drainage A and 0.05 acres of indirect and direct impacts to wetland impact in Devereux Creek. However, restoration efforts within these areas would restore approximately 0.05 acres of wetland habitat in Drainage A and 0.19 acres of wetland habitat in Devereux Creek. Further, the boardwalk bridges would reduce long-term disturbance of these habitats and a drainage analysis that was conducted for the proposed crossings demonstrated that the proposed boardwalk bridges would increase the drainage capacities of Drainage A and Devereux Creek. The proposed Project would also include the relocation of the existing Anza Trail around an existing vernal pool on the eastern end of the Project site as well as the restoration of this area. Potentially adverse impacts to these surface water bodies, including the vernal pools on Ellwood Mesa, may result from sedimentation during trail recontouring and construction as well as construction of the proposed improvements. However, these impacts would be reduced to less than significant levels with implementation of mitigation measures for impacts to *Hydrology and Water Quality* and *Geology and Soils* (MM WAT-

1, -2, -3, and -4, as well as MM GEO-3), which would require a storm water permit, Stormwater Pollution Prevention Plan (SWPPP), Notice of Intent, and Notice of Termination, as well as other related BMPs required by the City. Further, long-term impacts to biological resources associated with the proposed Project would be beneficial as the proposed Project would enhance southern vernal pool habitat, restore wetland habitat within jurisdiction wetlands, and remove segments of the shared Coastal-Anza Trail that pass through the high water marks of Drainage A and Devereux Creek.

d) Apart from the eastern end of the Project area, which is characterized by isolated native grassland, the Ellwood Mesa Open Space Area is characterized by disturbed non-native grassland habitat. Consequently, Ellwood Mesa provides limited opportunities for dispersal of ground-dwelling wildlife between the Project site and suitable habitat to the north, east, or west. The proposed Project would affect three small drainages; however, these drainages do not appear to be significant corridors for wildlife movement within the parcel and do not provide habitat connections to points north (City of Goleta 2004). Consequently, Project-related impacts to wildlife movement between on-site and off-site areas to the north, east, and west would be less than significant.

e) The proposed Project would not conflict with local policies or ordinances protecting biological resources, including those outlined in the Coastal Act or the Goleta GP/CLUP. Impacts to biological resources would be associated with construction activities and would be mitigated to less than significant levels with the incorporation of BIO-1 and -2, which would require sensitive species surveys and would establish native plant requirements; however, long-term impacts to biological resources within the Ellwood Mesa Open Space Area would be beneficial as the Project would protect and enhance biological resources, including ESHA and special status species. Consequently, the proposed Project would meet the intent of the Conservation Element within the GP/CLUP and would not conflict with other applicable measures protecting biological resources.

f) Implementation of the proposed Project would be consistent with the Ellwood-Devereux Coast Open Space and Habitat Management Plan and would not conflict with any other adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plan.

Cumulative Impacts

Implementation of the proposed Project would result in less than significant construction-related impacts to biological resources with the incorporation of mitigation measures for impacts to *Hydrology and Water Quality* (MM WAT-1, -2, -3, and -4), which would require a storm water permit, SWPPP, Notice of Intent, and Notice of Termination. In addition, a mitigation measure for impacts to *Geology and Soils* (i.e., GEO-3), which would require BMPs, and the mitigation measures for impacts to *Biological Resources* (i.e., BIO-1 and -2), which would require sensitive species surveys and would establish native plant requirements, would further reduce less than significant construction-related impacts to biological resources. However, long-term impacts to biological resources would be beneficial as the proposed Project would reduce impacts to sensitive habitats and sensitive species. Consequently, the proposed Project would not result in any considerable contribution to cumulatively considerable adverse impacts to biological resources.

Required Mitigation Measures

MM BIO-1 ***Sensitive Species Survey****: An Applicant-funded special status species survey must be conducted by a City-approved biologist immediately prior to construction. Depending on the timing of trail construction activities, the survey must include the following components:*

- *If trail-construction activities on the shared Coastal-Anza Trail or the trail segments along the eastern and western eucalyptus windrows would occur within the raptor breeding season (January 1 through September 15), a raptor survey must be conducted in these areas to establish the current breeding status of resident raptors adjacent to the relevant trail segments. This survey component must include recommendations regarding minimizing impacts during construction per GP/CLUP Policy CE 8.2, including setbacks and restrictions on construction scheduling. If nests are documented, construction work within a 300-foot radius of active nest(s) must be suspended until the young have fledged the nest per GP/CLUP Policy CE 8.4.*

- *If trail-construction activities within 100 feet of the edge of the eucalyptus groves that host known monarch butterfly aggregation sites would occur during the overwintering season for monarch butterflies (October 1 through March 31), a City-approved biologist must survey all eucalyptus trees within a 100-foot distance of the relevant trail and habitat restoration areas (i.e., along the shared Coastal-Anza Trail and the western extent of the Coastal Loop Trail) to determine use by monarchs per GP/CLUP Policy CE 4.5. If butterfly aggregations are found within 100 feet of the work area, trail-construction must be halted until a City-approved biologist has determined monarchs have left the site.*

- *If trail-construction activities would occur within the blooming period for southern tarplant (June 1 through September 30), a pre-construction survey must be conducted for southern tarplant. Recommendations must be made to reroute the trail around recorded individuals, limiting disturbance to the maximum extent feasible. If disturbance cannot be avoided, then potentially affected individuals would be relocated and/or additional southern tarplant individuals would be planted as a part of mitigation associated with the proposed Project.*

- *Prior to the commencement of any construction-related activities at the toe of beach access points (i.e., the interface of the bluff face and beach habitats), visual surveys for globose dune beetle and sandy beach tiger beetle must be conducted. If either of these sensitive species is observed within the footprint of the proposed trail recontouring or habitat restoration footprint individuals must be captured and relocated to adjacent suitable habitat.*

Plan Requirements and Timing. The pre-construction survey must be reviewed and approved by City of Goleta prior the issuance of a grading permit and the commencement of construction activities. The Applicant must adhere to all recommendations in the survey and trail construction crews must not encroach within any setbacks from identified active bird nests.

Monitoring. The City of Goleta must review and approve all grading and final trail construction plans prior to issuing the grading permit. The City of Goleta must discuss any restrictions with trail crews during the pre-site construction meeting and must inspect the site for compliance with survey recommendations.

MM BIO-2 ***Native Plant Requirements****: In order to protect the genetic integrity of the native plant populations on the undeveloped portions of the subject property, the Final Restoration Plan must explicitly prohibit the use of non-locally collected native plants and seed materials restoration within or adjacent to open space areas. All seed or plant material must come from sources within the Devereux Creek watershed per GP/CLUP Policy OS 5.4(d). The Final Restoration Plan for the proposed Project must prohibit buried irrigation infrastructure; all temporary irrigation components must be placed above ground in open space areas. The potential for damage to the pipe by vandalism or exposure is considered insufficient to offset the environmental damage caused by trenching to install pipes and structures and subsequent digging to remove pipes and structures. Pipes must be inspected monthly for leaks and all leaks must be repaired promptly to avoid erosion, weed establishment, or other environmental damage.*

Plan Requirements and Timing. The Final Restoration Plan, including irrigation components, must be prepared by a City-approved biologist and reviewed and approved by City staff prior to issuance of either a grading permit or land use permit.

Monitoring. City staff must verify compliance with the Restoration Plan in the field before and during trail construction activities. Further the Final Restoration Plan must include a five-year monitoring component.

Residual Impacts

Implementation of the proposed Project may result in short-term, construction-related impacts; however with implementation of MM BIO-1 and -2, which would require sensitive species surveys and would establish native plant requirements, and implementation of other mitigation measures, including MM WAT-1, -2, -3, and -4, as well as MM GEO-3, which would require a storm water permit, SWPPP, Notice of Intent, Notice of Termination, and other related BMPs required by the City, these impacts would be less than significant. Additionally, long-term impacts associated with habitat restoration under the proposed Project would be beneficial to biological resources. Consequently, under implementation of the proposed Project, residual impacts to biological resources would remain less than significant.

Cultural Resources

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?				×	

b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		×			
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		×			
d)	Disturb any human remains, including those interred outside of formal cemeteries?		×			

Existing Setting

Prehistoric and Historic Overview

The creeks, river valleys, and flood plains in Santa Barbara County, along with the fringing coastline, have supported a continuous cultural occupation dating back at least 8,000 years (City of Goleta 2004). The Ellwood Mesa Open Space Plan Area has experienced long and significant occupation as is evidenced by archeological resources known to be present in the general Project vicinity (City of Goleta 2004). An early Holocene occupation has been identified in the archaeological record that reflects the early emergence of non-agricultural village-based groups in the region. Current archaeological evidence suggests that a relatively small population existed in these areas, but by 2,000 years B.P., populations appear to have expanded considerably into resource-rich coastal and near-shore estuarine environments (City of Goleta 2004; Dillon 1990).

The first known European entry into the area was the expedition of Juan Cabrillo who sailed north along the California coast from Mexico in 1542. In the 1760s, the Spanish government decided to establish a series of military establishments called presidios and missions along the California coast between the two natural harbors of San Diego and San Francisco (City of Goleta 2004; Weber 1982). A presidio was established at Santa Barbara in 1782 to fill the gap between the previously established presidios in Monterey and San Diego. This established a permanent European presence in the area, and was shortly followed by the establishment of the Santa Barbara Mission in 1786. This mission had a strong effect on the Chumash in the vicinity of the Project area. It seems certain that a number of the Chumash left for the missions, though chapels were built for those remaining in rancherias in the Goleta area (City of Goleta 2004). The Chumash who moved to the missions worked in agriculture or herding, and steps were taken to assimilate them to European styles of life. This also proved to be dangerous to the health of the Chumash populations, as they were exposed to European diseases from which they lacked immunity.

The period of California history known as the Rancho Period began as a class of wealthy landowners known as ‘rancheros’ controlled the state. The Project area was originally located within the Rancho de los Dos Pueblos land grant, which was later subdivided into a number of different ranches.

Previously Recorded Cultural Resources

The Project area was previously surveyed for cultural resources in 1991 (City of Goleta 2004). The GP/CLUP indicates that no sensitive historic or cultural resources have been identified within the Project area (City of Goleta 2006). Additionally, there are no sites on the National Register of Historic Places (NRHP) or the California State Historic Resources Inventory in the

Project area (City of Goleta 2004). However, a file and records search, which was conducted at the Central Coastal Information Center (CCIC) of the California Historical Resources Information System in 2004, showed a single prehistoric archaeological site previously recorded in the Project area.

The prehistoric site within the Project area, CA-SBA-1321, was originally recorded in 1974, and was initially seen as a surface scatter of marine shell and ground stone artifacts (City of Goleta 2004). Oil wells and an oil refining operation were conducted within the site area and have apparently heavily damaged the site. Test excavations were conducted on the site (City of Goleta 2004; Onken 1997) for the Santa Barbara County Parks Department. Results of this work show that deposits extend to a depth of 60 centimeters but that they have been heavily disturbed by the oil extraction operations. This disturbance and the sparse returns of material prompted the evaluation that this site is not eligible for the California Register of Historic Resources (CRHR) (City of Goleta 2004; Onken 1997).

Thresholds of Significance

A significant impact on cultural resources would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additional thresholds are contained in the City's Thresholds Manual. The City's adopted thresholds indicate that a project would result in a significant impact on a cultural resource if it results in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of such a resource would be materially impaired.

Project Specific Impacts

a-d) As discussed previously, the Project area was surveyed for cultural resources in 1991 and no sensitive historic or cultural resources were identified. A known prehistoric site, CA-SBA-1321, is located within the Project area; however, this site is heavily damaged and is no longer intact, nor eligible for the California Register of Historic Resources.

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

Cumulative Impacts

Continued loss of cultural resources on a project-by-project basis could result in significant cumulative impacts to such resources over time; however, the Project area is not known to contain any archeological or historic resources. Additionally, implementation of MM CR-1 and

MM CR-2, which require a Cultural Resources Monitoring Plan and establish a protocol for the handling of human remains, would ensure that the Project's potential to impact cultural resources would not be cumulatively considerable in the event that any unknown cultural resources are uncovered during the implementation of the proposed Project.

Required Mitigation Measures

MM CR-1 ***Cultural Resource Monitoring Plan****: In the unlikely event that historical, archaeological, or paleontological resources are encountered during grading, work must be stopped immediately or redirected until a qualified Registered Professional Archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigation standards set forth in the City Archaeological Guidelines. If remains are found to be significant, they must be subject to a Phase 3 mitigation program consistent with City Archaeological Guidelines and funded by the Applicant.*

Plan Requirements and Timing: This requirement must be printed on all approved final grading and trail construction plans submitted for grading and land use permits.

Monitoring: City staff must convey this requirement to trail construction crews during a pre-construction meeting and conduct periodic field inspections to verify compliance during ground disturbing activities.

MM CR-2 ***Handling of Human Remains****: In the event human remains are encountered during grading, work must be stopped immediately and the remains must be treated in accordance with Health and Safety Code Section 7050.5 and CEQA Guidelines (Title 14 CCR Division 6, Chapter 3) Section 15064.5(e).*

Plan Requirements and Timing: This requirement as well as an appropriate point of contact to be contacted in the event that human remains are discovered must be printed on all final grading and trail construction plans submitted to the City for grading and land use permits.

Monitoring: City staff must convey this requirement to trail construction crews during a pre-construction meeting and conduct periodic field inspections to verify compliance during ground disturbing activities.

Residual Impacts

With implementation of MM CR-1 and MM CR-2, which require a Cultural Resources Monitoring Plan and establish a protocol for the handling of human remains, residual Project-specific impacts as well as the Project's contribution to cumulative impacts on historical, archaeological, paleontological resources, including human remains, would be less than significant.

Geology and Soils

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:		×			
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.		×			
ii. Strong seismic ground shaking?		×			
iii. Seismic-related ground failure, including liquefaction?			×		
iv. Landslides?		×			
b) Result in substantial soil erosion or the loss of topsoil?		×			
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				×	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				×	

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal alternative water water disposal systems where sewers are not available for the disposal of wastewater?				×	

Existing Setting

Topography

The Ellwood Mesa Open Space Plan Area is located within a shallow, east-west trending valley between the Santa Ynez Mountains and the low coastal mesa (City of Goleta 2004). The topography of Ellwood Mesa is characterized by an elevated marine terrace that has been tilted and folded by uplift on the North Branch of the More Ranch fault (Minor et al. 2009). Elevations within the Project area range from just above mean sea level (msl) at the base of the bluffs to 85 feet above msl atop the mesa (City of Goleta 2004). The topography of the uplifted terrace surface is gently sloping but undulating, and has been incised by and is controlled by Devereux Creek and, to a lesser extent, smaller drainages. The uplift and warping of the terrace has also created vernal pools (i.e., topographic depressions) in several locations on the Ellwood Mesa to the south of the fault. Grades of five to ten percent characterize most of the northern portion of the Project area, and steepen to more than 30 percent towards Devereux Creek (City of Goleta 2004). Devereux Creek has incised a broad canyon, including several tributary ravines, which limit access as grades in these areas exceed 15 percent. Additionally, the seacliff along the Ellwood Mesa Open Space Plan Area is very steep, ranging in grade from 50 to 300 percent (City of Goleta 2004).

Land clearing for grazing and agriculture activities between the 1800s and early 1900s resulted in erosion and gullying of several areas within the Project area. Additionally, grading for roadways, paved beach access, and oil development activities all resulted in a highly altered environment. Remnants of an old road down to the beach are still present at the southeast end of the Ellwood Mesa Open Space Plan Area, at Access Point E. This road is believed to originally be an old oil field access road from a gas plant formerly located near the top of the bluffs leading to a small road at the base of the bluffs (City of Goleta 2004). The asphalt road once allowed residents from

Beach Access Point E is characterized by remnants of a degraded asphalt road (right) that conveys surface water runoff that contributes to erosion of the bluff.

the Santa Barbara Shores neighborhood to drive down to the beach; however, this road is severely degraded and currently serves as a conduit for runoff erosion.

Soils

Soils within the Project area can be grouped into associations that have formed on foothill and coastal terraces, in canyons and coastal plains, and in wetland habitats. The Milpitas-Positas-Concepcion association is composed of nearly level to steep, moderately well drained fine sandy loams on terraces. The Ayar-Diablo-Zaca association is composed of gently sloping to very steep, well-drained clays on uplands. The Camarillo-Aquepts association is composed of nearly level, poorly drained and very poorly drained fine sandy loams on low flood plains and tidal flats. The U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) has mapped the soils located within the region (Shipman 1981). The soils in the Project area are listed below and shown in Figure 7. The Diablo clay has a Capability Class II designation as prime agricultural land. However, the State Department of Conservation Important Farmlands mapping program, indicates that the Project area does not meet the criteria for prime farmland (City of Goleta 2004; County of Santa Barbara 1992).

Table 6: Soil Types within the Project Area

Soil Name	Slope	Erosion Hazard	Runoff	Restrictions for Paths or Trails
Beach Sand (BE)	0-2	Severe	Very Slow	Moderate
Camarillo fine sandy loam (Cb)	0-2	Slight	Very Slow	Moderate
Concepcion fine sandy loam (CgA)	0-2	Slight	Very Slow	Slight
Concepcion fine sany loam (CgC2)	2-9	Moderate	Rapid	Slight
Conception fine sandy loam (CgE2)	15-30	Very High (Gullying)	Rapid	Moderate
Diablo clay (DaC)	2-9	Slight	Medium	Moderate
Diablo clay (DaD)	9-15	Moderate	Medium	Moderate
Milpitas-Positas fine sandy loam (MeC)	2-9	Moderate	Medium	Slight
Milpitas-Positas fine sandy loam (MeD2)	9-15	High	Rapid	Slight

Source: Shipman 1981

Geology and Geological Hazards

The Ellwood Mesa Open Space Plan Area is located on the southern flank of the Santa Ynez Mountains, in the western portion of the Transverse Ranges Geomorphic and Structural Province (California Geological Survey 2002). The combined effects of repeated, large sea level

changes in the Quaternary Period (i.e., past 1.8 million years) and tectonic uplift of the coastal plain on the More Ranch fault system have resulted in uplifted marine terraces, including Ellwood Mesa, which has been dated at approximately 45,000 years B.P.

The general geology of the coastal mesa consists of a thin veneer of Quaternary marine and non-marine terrace deposits overlying Tertiary sedimentary rocks. The Miocene and Pliocene Bedrock formations of the Project area are mostly overlain by Holocene and older alluvial terrace deposits (Dibblee 1966). The bedrock lithology of most of the Project area is composed of Monterey shale (Tm). This Miocene-age shale is well exposed along the seacliffs, and exhibits whitish gray, finely laminated bedding planes that are steeply dipping to the south in most places. Older Alluvium (Qoa) forms the surficial strata over most of the upland terrace mesas. It consists of marine and non-marine terrace deposits (Dibblee and Ehrenspeck 1966; Dibblee 1987). Recent landslide deposits (Qls) are locally found along the seacliff. Younger Alluvium (Qa) is common along Devereux Creek and its tributaries, as well as other low-lying areas (Dibblee 1966).

Geological hazards present in the Ellwood Mesa Open Space Plan Area include steep slopes, expansive soils, differential ground settlement, and fault rupture. The seacliff along the Ellwood Mesa Open Space Plan area is 80 feet in height and characterized by a very steep grade. Several small landslides have occurred along the seacliffs which, along with debris flows and rock falls, pose hazards at the base of the bluffs, particularly under saturated conditions or as the result of earthquake loading. Two small slides have previously taken out portions of an old road that descends from the top of the bluff to the beach. Additionally, steep slopes also pose a fall hazard, both along the seacliffs and in inland erosion areas where steep gullies exist. Ground surfaces along the steep drainage ravine banks have little vegetation and show a high potential for slope failure during heavy rainfall.

The southern property boundary is composed of sheer seacliffs broken by two steep ravines leading to the beach. Expansive soils are mapped in the western portion of the site (Diablo clay-mapping units DaC and DaD on Figure 7). Portions of this area have been excavated for soil remediation associated with a former gas plant. Differential settlement may occur across the footprint of the excavation if the soils were not properly recompacted upon completion of former remediation activities. All three branches of the More Ranch fault cross the property. Two small slumps occur at the seacliff where the Middle Branch of the More Ranch fault meets the cliff. The easternmost of these two slumps appears to be an older feature, whereas the western slump exhibits more recent morphology and may still be active. Given that both the North Branch and the Middle Branch are potentially active, ground rupture hazard exists. However, due to the thin layer of alluvial material, relatively deep ground water, and the lack of sandy soils, the liquefaction potential on the Ellwood Mesa Open Space Plan area is considered to be low (City of Goleta 2004).

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Geological Resources

FIGURE 7

Thresholds of Significance

A significant impact on geology/soils would be expected to occur if the project resulted in any of the impacts defined in the above checklist. The City's Thresholds Manual assumes that a project would result in a potentially significant impact on geological processes if the project, and/or implementation of required mitigation measures, could result in increased erosion, landslides, soil creep, mudslides, and/or unstable slopes. In addition, impacts are considered significant if the project would expose people and/or structures to major geological hazards such as earthquakes, seismic related ground failure, or expansive soils capable of creating a significant risk to life and property.

Project Specific Impacts

a) As previously discussed, the Ellwood Mesa Open Space Plan Area is traversed by the More Ranch Fault, which closely follows Devereux Creek, located to the south of the home developments (see Figure 8). An earthquake along a nearby fault could result in significant ground shaking and possibly rupture of the More Ranch Fault within the Project area. Peak ground accelerations on bedrock of 0.6 g or greater may occur at the site (City of Goleta 2004). Consequently, existing as well as any proposed structures, including drainage crossings, beach access steps, and drainage improvements, would be subject to potentially significant impacts from earthquake events. While only habitable structures are subject to Alquist-Priolo fault hazard zone setbacks in California, engineering designs for the stream crossings and steps at Beach Access Point F would be required to incorporate reinforcement and materials that would withstand seismic activity effects related to credible ground acceleration factors. Given that these measures are regulated by the California Building Code (24 Cal. Code Regs., § 1, CBC) and Safety Element within the GP/CLUP, the measures would be required as part of standard plan check review of the proposed Project by the City of Goleta. Implementation of these measures would reduce the potential impacts of earthquake ground shaking and ground rupture to less than significant.

b) Trail construction activities and drainage improvements associated with the proposed Project would result in minor changes to the topography along the Coastal and Anza Trail corridors, particularly at the drainage crossings and beach access points. However, these improvements would be managed to be consistent with GP/CLUP Policy OS 5.3, *Public Access and Recreation*. Additionally, the grading necessary to bring the trail network up to grade and address surface water erosion issues is relatively minor (i.e., approximately 900 cubic yards of cut and fill). Further, the grading would generally be spread across a large gently-sloping area, and the trail grade would be constructed

Implementation of the proposed Project would result in minor recontouring and the construction of drainage crossings that would bring the grade along the trail to five percent, which would create safer accessibility conditions.

pursuant to established CBC and City of Goleta Grading Ordinance standards (Chapter 15.09 of the City of Goleta Municipal Code Grading, Erosion and Sediment Control). Regardless, the grading during trail construction activities would expose underlying soils over the short-term and would potentially cause substantially increased erosion and sedimentation of Devereux Creek and its tributaries. Similarly, the construction of drainage improvements at the beach access points would expose soils on the blufftop and bluff face. Further, removal of non-native species associated with the Restoration Plan as described in the Project Description would result in temporary exposure of underlying soils until the proposed vegetation and/or trail surfacing materials could stabilize these areas. However, as described in the Restoration Plan (see Attachment 1), planting would commence within 60 days of any soil disturbance, and erosion control blankets, or natural biodegradable materials would be installed on slopes as needed for bank stabilization.

While short-term construction impacts may increase the potential for erosion, long-term impacts of the proposed Project would result in beneficial impacts related to erosion within the Ellwood Mesa Open Space Plan Area. The Project would reduce the trail grade to improve accessibility standards and would make the trail less susceptible to sheet flow erosion, which can cause rills and gullying. The Project proposes to include erosion control methods that would focus on elevating the Coastal and Anza trails slightly so that they would be above grade and outsloped, thus allowing water to flow off the trail system rather than ponding. Additionally, trail design would include dips and additional erosion control measures to divert water off of the trail surface. Further, the proposed Project would address uncontrolled runoff from blufftop and beach access trails, which appears to be contributing to erosion of the coastal bluffs. Several areas of the lower bluffs have been severely eroded as a result of water flowing down the degraded asphalt roadway at Beach Access Point E, as well as on the severely entrenched trail at Beach Access Point F. The proposed Project would remove the degraded asphalt at Beach Access Point E and create a curvilinear trail with erosion control measures. Additionally, the Project would install stairs at Beach Access Point F and the trail would be ramped down to the sand. As previously described, the proposed Project would include the construction of two bioswales at Beach Access Point E that would funnel water into two downdrains (see Figure 8). Similarly, the proposed Project would include a gravel infiltration trench with a buried perforated pipe and filter sleeve at Beach Access Point F. These drainage improvements would convey runoff away from the access points and would reduce long-term erosion impacts to the bluff face fronting Ellwood Beach. Additionally, removal of berms within the borrow sites would provide fill material for regrading and also improve drainage patterns, directing water inland, away from the adjacent blufftops. Further, the Project would remove non-native species and revegetate these areas with native coastal species.

Consequently, the short-term impacts of the proposed Project would be less than significant with the incorporation of MM GEO-3, which requires the implementation of Best Management Practices. However, the long-term impacts of the Project would be beneficial with regard to erosion.

c) Given the gently sloping topography across the majority of Ellwood Mesa, recontouring of the Coastal and Anza trails, including the construction of drainage crossings and realigned trail segments, would not be anticipated to create unstable slopes. As discussed previously, implementation of the proposed Project would reduce grade in areas where it exceeds accessibility standards (e.g., following the Devereux Creek

crossing). Landslide potential associated with the proposed blufftop trail components is relatively low, although small mudflows or minor slumps are evident along the bluff, such as the two that have previously damaged portions of the asphalt road at Beach Access Point E. The Coastal Trail along the blufftop overlies Concepcion series soils that are well drained and form low terraces that parallel the coastline. Runoff on these soils is low and the hazard of erosion is slight. Additionally, the restrictions for construction of trails or pathways on this soil are slight (Shipman 1981). Further, drainage improvements associated with the proposed project, particularly outsloping of the trail away from the blufftop, would reduce blufftop runoff and erosion as well as the potential for small landslides. Consequently, it is unlikely that proposed improvements of Beach Access Point E and F within this area may be adversely impacted by landslides. Regardless, engineered slopes included in the Project (e.g., Beach Access Points E and F) would be required to meet established standards in the CBC and grading requirements in Chapter 15.09 of the City of Goleta Municipal Code. Impacts associated with the proposed Project would be less than significant with the incorporation of MM GEO-1, which would require compliance with design and grading standards.

d) Expansive soils (i.e., Diablo clay) are mapped in the western portion of the Project site, south of the Comstock Homes Development (The Bluffs) (City of Goleta 2004). While trail recontouring is proposed through this area, no structures (e.g., drainage crossings) would be constructed within these soil types. Consequently, there would be no impact to expansive soils.

e) The proposed Project would not require the use of septic tanks or wastewater disposal systems. Additionally, the proposed Project would not impact the existing sanitary sewer lines within the Project area. Therefore, there would be no impact to septic systems or alternative wastewater treatment systems as a result of the project.

Cumulative Impacts

Implementation of the proposed Project would result in short-term adverse construction-related erosion impacts, particularly in the immediate vicinity of the drainage crossings. However, long-term impacts associated with the proposed Project would be beneficial as the Project would address erosion of the trail system and contribute to a reduction in coastal blufftop erosion. Consequently, implementation of the proposed Project would have a beneficial impact and would not result in cumulative adverse impacts.

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Drainage Plan – Access Point E

FIGURE 8

Required Mitigation Measures

MM GEO-1 ***Design and Grading Standards****: Final grading and trail construction plans submitted to the City of Goleta for review and approval must be consistent with applicable established CBC and City of Goleta Grading Ordinance standards per City of Goleta Municipal Code § 15.09. The plans must include the location of the More Ranch Fault system and demonstrate that all structures are designed in compliance with earthquake standards for CBC Seismic Zone 4.*

Plan Requirements and Timing: Final grading and trail construction plans must be submitted and approved prior to issuance of a grading permit. The grading permit must be issued based on compliance with all applicable laws, ordinances, and regulations.

Monitoring: The City must review and approve final grading and trail construction plans and must inspect site to ensure compliance.

MM GEO-2 ***Blufftop Erosion Monitoring****: The City shall monitor natural seacliff erosion and retreat shall be monitored every ten years and after every El Niño winter. The City must manage the relocation of the Coastal Trail if unsafe conditions exist along the bluffs as the result of landslides, erosion, and cliff retreat.*

Plan Requirements and Timing: The City of Goleta must monitor and document Coastal Trail and beach access trail conditions at a minimum of every ten years and after every El Niño storm season to ensure unsafe conditions do not exist. Flagging, photo documentation, or other methods must be used by the City of Goleta to manage relocation of Coastal Trail, if needed, for safety.

Monitoring: The City of Goleta must monitor the condition of the Coastal Trail and beach access trails at a minimum of every ten years, and after every El Niño storm season to ensure unsafe conditions do not exist, and to monitor seacliff retreat rates through time.

MM GEO-3 ***Best Management Practices (BMPs)****: Implementation of the proposed Project must include the following*:

- *Other than what has been described for installation of the boardwalk and other improvement activities, grading must be prohibited within 50 feet of the Devereux Creek top-of-bank.*

- *The Applicant must limit excavation and grading to the dry season (April 15 to November 1) unless a Building and Safety-approved erosion control plan is in place and all measures therein are in effect.*

- *BMPs must be employed to control erosion, including temporary siltation protection devices such as silt fencing, straw bales, and sand bags. These must be placed at the base of all cut and fill slopes and soil stockpile areas where potential erosion may occur. The final grading plan must include erosion control measures including types and locations of BMPs. The plan must be approved by the City of Goleta prior to the commencement of grading operations.*

- *The City must periodically inspect the drainage crossings and beach access points during the wet season to ensure structural integrity and avoidance of flood hazards or scouring. Maintenance and repairs must be performed as needed.*

Plan Requirements and Timing: Final grading and trail construction plans for the Ellwood Mesa Open Space Plan Area must be submitted for review and approval by the City of Goleta prior to the issuance of either a grading permit or land use permit.

Monitoring: The City of Goleta must inspect construction sites and monitor effectiveness of all erosion control BMPs and other requirements. If and when erosion controls are damaged during a storm event, they must be replaced prior to resuming work in the Project area.

Residual Impacts

With implementation of MM GEO-1, -2, and -3, which would require design and grading standards, blufftop erosion monitoring, and other associated BMPs, residual Project-specific impacts as well as the Project's contribution to cumulative impacts on geological resources would be less than significant.

Greenhouse Gas Emissions

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			×		
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			×		

Existing Setting

Global climate change involves alterations to long-term average weather trends (i.e., climate), which can be measured by changes in temperature, wind patterns, and precipitation (U.S. Climate Change Science Program 2009). Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters the Earth's atmosphere and a portion of the radiation is absorbed by the Earth's surface. This absorbed radiation is then emitted from the Earth as low-frequency infrared radiation, which is absorbed and re-emitted by GHGs, which absorb and emit radiation in the infrared spectrum. As a result, infrared radiation that otherwise would have escaped back into space is trapped, resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on Earth; however, scientific consensus has identified human-related emission of GHGs above natural levels as a

significant contributor to global climate change (U.S. Climate Change Science Program 2009). GHGs include water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ground-level O_3, and fluorinated gases such as chlorofluorocarbons and hydrochlorofluorocarbons (USEPA 2013).

In *Massachusetts v. Environmental Protection Agency* (2007) 549 U.S. 497, the United States Supreme Court ruled that the USEPA has the authority to regulate GHGs as pollutants under the Clean Air Act (42 U.S. Code [USC] 7401 et seq.) (Center for Climate and Energy Solutions 2013). However, unlike criteria pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern, GHGs are pollutants of global concern. Whereas criteria pollutants and TACs with localized air quality effects have relatively short atmospheric lifetimes, GHGs have long atmospheric lifetimes. GHGs persist in the atmosphere for long enough time periods to be dispersed around the world. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables, it is understood that currently more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration (Seinfeld and Pandis 1998).

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, electric utility, residential, commercial, and agricultural sectors (CARB 2009). In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation (CARB 2009). California experienced a statewide GHG reduction from 464 million metric tons (MMT) of CO_2 equivalent (CO_2e) in 2000 to 457 MMT of CO_2e in 2009, resulting in a decrease of 1.5 percent between 2000 and 2009. The 2009 levels are the lowest in the ten-year period while the highest level of 489 MMT of CO_2e was experienced in 2007. Since 1990 GHG emissions have increased approximately 5.5 percent through 2009. A 5.8 percent decrease in emissions from 2008 through 2009 occurred but has been attributed to the slower economy. This decreasing trend is also reflected in the national emissions decrease of 6.1 percent for the same period (CARB 2011). For comparison, the national total GHG emissions in 2009 were 6,633 MMT of CO2e (USEPA 2011), of which California's emissions represents 6.9 percent.

Thresholds of Significance

As directed by SB 97 and noted above, the California Natural Resources Agency adopted amendments to the CEQA Guidelines that became effective on March 18, 2010. These new CEQA Guidelines provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents. According to the amendments made to Appendix G of the CEQA Guidelines, the project would have a significant impact if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The adopted CEQA amendments require a Lead Agency to make a good-faith effort based, to the extent possible, on scientific and factual data in order to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project. They give discretion to the Lead Agency whether to:

- Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use; and/or

- Rely on a qualitative analysis or performance-based standards.

In addition, a Lead Agency should consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:

- The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

- Whether the project emissions exceed a threshold of significance that the Lead Agency determines applies to the project; and

- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

The amendments call on Lead Agencies to establish significance thresholds for their respective jurisdictions.

Currently, neither the State of California nor the City of Goleta has established CEQA significance thresholds for GHG emissions. Indeed, many regulatory agencies are sorting through suggested thresholds and/or making project-by-project analyses. This approach is consistent with that suggested by CAPCOA in its technical advisory entitled "*CEQA and Climate Change: Addressing Climate Change through the California Environmental Quality Act Review* (California Air Pollution Control Officers Association [CAPCOA] 2008):

"…In the absence of regulatory standards for GHG emissions or other specific data to clearly define what constitutes a 'significant project', individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice."

In June 2010, the Bay Area Air Quality Management District (BAAQMD) became the first regulatory agency in the nation to approve guidelines that establish thresholds of significance for GHG emissions (BAAQMD 2010).

Table 7: Bay Area Air Quality Management District Guidelines for GHG Emissions

GHG Emission Source Category	Operational Emissions
Other than Stationary Sources	1,100 MT CO_2e/yr OR 4.6 MT CO_2e/yr/SP*/yr (residents + employees)
Stationary Sources	10,100 MT CO_2e/yr
Plans	6.6 MT CO_2e/yr/SP*/yr (residents + employees)

Note: SP* - Service Population

The BAAQMD threshold is a promulgated CEQA threshold that has undergone full public review and comment, with approval by the BAAQMD governing board, and technical support by

BAAQMD staff. It applies to a nine-county portion of northern California that includes very diverse populations and land uses.

Some areas of the BAAQMD jurisdiction resemble land use patterns in the Goleta area. The climatic regime in the Goleta-Santa Barbara area that governs energy demand for space heating and cooling is also very comparable to that occurring in the BAAQMD. Additionally, in June 2010, the Santa Barbara County Planning and Development Department released a memorandum *"Support for Use of Bay Area Air Quality Management District Greenhouse Gas Emissions Standards,"* providing evidentiary support for reliance on the proposed BAAQMD standards as interim thresholds of significance in Santa Barbara County (SBCACPD 2010). The memorandum notes that certain counties in the Bay Area are similar to Santa Barbara County in terms of population growth, land use patterns, GP/CLUP policies, and average commute patterns and times.

Accordingly, given that the City of Goleta does not have established thresholds of significance for GHG emissions, and as the City is located in Santa Barbara County, the rationale for applicability of the BAAQMD thresholds would generally apply. Therefore, the City has applied the following two thresholds of significance to the project. Would the project:

1) Exceed the daily significance threshold adopted by the Bay Area Air Quality Management District, i.e., of 1,100 MT CO2e/yr, for operational GHG emissions and/or result in significant GHG emissions based on a qualitative analysis.

2) Employ reasonable and feasible means to minimize GHG emissions from a qualitative standpoint, in a manner that is consistent with the goals and objectives of AB 32.

The use of the BAAQMD threshold does not imply that it is a threshold that the City of Goleta has formally adopted, or should adopt, as a GHG significance threshold for all present or future project analyses.

Sea Level Rise

The chief potential impact of climate change on the project is a rise in sea level such that the project would be impacted by coastal flooding events whose intensity is enhanced by sea level rise. However, accurate assessment of the impact of climate change on the project is a highly speculative activity. Published scientific articles indicate that there is no commonly-accepted methodology that exists at this time for determining such impacts. There is lack of scientific consensus as to how potential future climate change will influence future coastal flooding storm events. Any such analysis would rely on the selection of hypothetical climate change scenarios whose predictive accuracy cannot be confirmed. Quantitative estimates of future climate impacts at any particular site are speculative and not subject to accurate evaluation at this time. In addition to the speculative nature of inquiry into the impacts of climate change on development projects, there is no requirement under CEQA that such impacts be reviewed. Impacts associated with sea level rise are therefore not analyzed in this document.

The Project site is located in a natural area on Ellwood Mesa. As sea level rise occurs, bluff erosion could increase. Impacts from bluff erosion would be mitigated by MM GEO-2, which would require the City to monitor natural seacliff erosion every ten years and after every El Niño winter. The City would manage the relocation of the Coastal Trail if unsafe conditions exist along the bluffs.

Project Specific Impacts

a, b) The proposed Project would generate GHGs during Project construction activities, including excavation and grading of fill material as well as the construction of drainage crossings and steps at Beach Access Point F. Based on construction model runs conducted using the URBEMIS 2007 (version 9.2.4) air quality modeling software for the 2008 unmitigated condition (see Attachment 2), it is anticipated that Project construction generated CO_2 emission levels would be approximately 3.81 metric tons per day. Assuming that construction would occur over the course of a three-month period, the Project's total GHG emissions due to construction would be approximately 249 metric tons. The City of Goleta has not adopted significance criteria for construction activities, and neither has the BAAQMD. However, this level of GHG emissions is not considered significant because the emissions would be temporary and finite in nature.

Implementation of the proposed Project would not include the development of facilities that would result in direct consumption of fossil fuels or indirect operational GHG emissions. Further, as discussed below in *Transportation and Traffic*, implementation of the proposed Project would not result in any changes to the transportation network or increases in available parking. Consequently, the proposed Project would not result in increased trip generation resulting in increased transportation related GHG emissions.

The proposed Project's short-term construction-related GHG emissions would be minor and would not be significant. Additionally, the proposed Project would not conflict with any other plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. Therefore, Project GHG emissions impacts would be less than significant.

Cumulative Impacts

GHG emissions from the proposed Project, as well as GHG emissions from other projects in the area would be incremental and represent a small percentage of California's GHG emissions. Additionally, the proposed Project would only result in construction-related GHG emissions as there are no proposed facilities that would consume fossil fuels and emit GHGs over the long-term. Consequently, the incremental impact of the proposed Project would not contribute to a cumulatively considerable impact with regard to GHGs.

Required Mitigation Measures

As the impacts associated with GHGs would be less than significant, no mitigation measures are required or recommended.

Residual Impacts

Residual impacts as a result of GHG emissions would remain less than significant.

Hazards and Hazardous Materials

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		×			
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		×			
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school?				×	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				×	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			×		
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				×	
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		×			
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?		×			

Existing Setting

The Ellwood Mesa Open Space Plan Area is located in a region of historic oil and gas development comprising what was once one of the most productive oil fields in the region

between 1928 and 1931 (City of Goleta 2004). Abandonment of some of the onshore wells in the Project area may have occurred as early as the 1930s; however, as a result of oil and gas production activities, petroleum, hydrocarbon and petrochemical contaminants associated with historic oil wells, tanks, flowlines or sumps, and other oil field-related equipment have been identified on Ellwood Mesa (City of Goleta 2004).

The Ellwood coastline was heavily developed with oil and gas production facilities in the late 1920s and early 1930s. Most of the production wells were located in the western region of the mesa, termed the Santa Barbara Shores sub-area. (Photograph courtesy of CSLC.)

Seven historically producing abandoned oil wells have been identified within the Project area. Oryx Energy Company "Doty" Oil Wells #1, #2, #3, #7, and #8 were identified as producing wells, located on the beveled surface at the top of the bluff. Additionally, a Phase I ESA conducted in 1986 identified Doty #4 and #5 as well as four other areas of potential concern on Ellwood Mesa, including an oil well sump and drill cuttings stockpile, oil field debris, crude-oil impacted soil, and an area of petroleum-impacted soil located adjacent to a suspected crude oil pipeline (City of Goleta 2004). Further, a surface water pond exists on the coastal bluff at Beach Access Point E, located south of Santa Barbara Shores Drive. The depression for this pond appears to have been artificially created by grading that was done in the past in order to extinguish a fire (City of Goleta 2004). However, the possibility exists for oil, methane, or toxic gases to migrate up through this subsurface feature and to release into the environment (City of Goleta 2004).

In 1997, Secor International Incorporated (Secor) and OHM Remediation Services Corporation conducted remediation activities at the Santa Barbara Shores Park property on the eastern end of the Project area between July and October 1997. During this time, OHM Remediation Services Corporation excavated approximately 60,000 cubic yards of in-situ, overburden, suspect, and hydrocarbon-impacted soil from within Devereux Creek, Doty Oil Well #1, Doty Oil Well #8, and the former processing plant (City of Goleta 2004) Of the total volume excavated, approximately 23,000 cubic yards of hydrocarbon-impacted soil was transported offsite and approximately eight cubic yards of lead-impacted soil was transported offsite (Secor 1997). Additionally, mitigation measures associated with the implementation of the Ellwood-Devereux Open Space Plan required appropriate well abandonment through the Fire Prevention Division (FPD) and the California Division of Oil, Gas, and Geothermal Resources (DOGGR) prior to the issuance of a Land Use Permit for the Comstock Homes Development (The Bluffs). These mitigations required that the applicant perform the necessary abandonment and receive FPD and DOGGR verification that the mitigations were implemented and abandonment had been completed in accordance with the approved plans. Further, soil management plans were required for the trail construction areas to provide guidance for the proper handling, onsite management, and disposal of impacted soil that may be encountered during construction activities. Consequently, hazardous materials associated with abandoned wells would not be expected to remain within the Project area.

Thresholds of Significance

A significant impact with regard to hazards and hazardous materials would be expected to occur if the project resulted in any of the impacts noted in the above checklist. In addition, the City's Thresholds Manual addresses public safety impacts resulting from involuntary exposure to hazardous materials. These thresholds focus on the activities that include installation of or modification to facilities that handle hazardous materials, transportation of hazardous materials, or non-hazardous land uses in proximity to hazardous facilities. Since the project is not a hazardous materials facility, the City's risk based thresholds are not particularly applicable. However, for the purposes of this analysis, the project would pose a significant impact if it results in the exposure of people to a variety of hazards or hazardous materials as listed above.

Project Specific Impacts

a, b) Hazardous materials used at the Project site would be limited to those associated with heavy construction equipment and herbicides used during Project-related trail construction and habitat restoration activities. These potential impacts would be temporary and less than significant with the incorporation of MM HAZ-1 which would require coordination with SBCFD FPD. Following the completion of trail construction activities, there would be no long-term impacts associated with routine use or transport of hazardous materials.

Limited heavy construction equipment would be required for recontouring of the trail surface (such as the equipment shown above, used for minimal trail disturbance at Lake Los Carneros). (Photograph courtesy of Ray Ford)

Additionally, soils in this area have the potential to be impacted by hazardous materials associated with past oil development activities. Contaminants of concern include petroleum hydrocarbons (i.e., benzene, crude oil, waste oil, and light petroleum distillates), metals, volatile organic compounds, semi-volatile organic compounds, and polynuclear aromatic hydrocarbons (PAHs). Several areas in the Ellwood Mesa Open Space Plan Area have been impacted by past oil development and have been assessed and remediated as required by mitigations associated with the Comstock Homes Development (The Bluffs). Disturbance of surface soils associated with native cut and fill for trail recontouring could potentially uncover impacted soils and expose trail construction workers and recreational users of the site to potential health hazards. Further, abandoned oil wells and oilfield debris are present within the Ellwood Mesa Open Space Plan Area and pose physical hazards to public health and safety. Debris consists of concrete, steel cables, piping, wood, wire, steel plates, etc. There are a number of areas throughout the Open Space Plan Area that have not been examined at all or have only had limited evaluation. Consequently, implementation of the proposed Project could potentially result in

significant short-term impacts associated with unknown hazardous materials; however these impacts would be less than significant with the incorporation of MM HAZ-1, which would require coordination with SBCFD FPD and Santa Barbara County PHD Environmental Health Services (PHD-EHS).

c) The Ellwood Mesa Open Space Plan Area is located immediately south of Ellwood Elementary School. However, as described in the preceding discussion, implementation of the proposed Project would not result in long-term increases of hazards emissions or hazardous materials on the Project site and would not directly or indirectly impact the school. Therefore, implementation would result in no impacts to Ellwood Elementary School or any other school proximate to the Project site.

d) The Project area is not located on a site that is known to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (City of Goleta 2004). Therefore, implementation of the proposed Project would not create a significant hazard to the public or the environment.

e, f) There are no private airstrips in the vicinity of the Project site. The Project site is located outside of the Santa Barbara Municipal Airport approach zone as defined by the Santa Barbara County Airport Land Use Plan; therefore, no measurable impact to public safety would result from implementation of the proposed Project.

g) Implementation of the proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan; however, new trail design could potentially affect current emergency access to the Ellwood Mesa Open Space Area due to potential changes to onsite emergency access road width. Emergency access is currently provided to Ellwood Mesa by Santa Barbara Shores Drive, which enters the Project area from the north where it becomes an unpaved road and meets an unnamed weathered access road, which includes segments of the Anza Trail. Implementation of the proposed Project would recontour this segment of trail and reduce its width to approximately six feet. However, implementation of MM HAZ-1, which requires coordination with the SBCFD and ensures that emergency access requirements would be met, would reduce this impact to a less than significant level.

h) The proposed Project area is located outside of the fire hazard severity zones, as defined by California Department of Forestry and Fire Protection (CALFIRE) (CALFIRE 2007; City of Goleta 2012a). However, the Project area is characterized as open space with short, sparse dry climate grass fuels and very high load, dry climate timber shrub fuels that pose low to moderate fire hazards (City of Goleta 2012a). The greatest fire hazard in the Project area is associated with the eucalyptus groves to the north, which pose extreme fire hazards (City of Goleta 2012a). Approximately 20 fire hydrants are located to the north of the Project area, 12 of which are located within the adjacent Santa Barbara Shores neighborhood. The Ellwood Mesa Open Space Area is included in the City of Goleta Community Wildfire Protection Plan (City of Goleta 2012a), which includes measures for fuel reduction to reduce wildfire hazards to nearby residences associated with the nearby eucalyptus groves. Short-term project improvement activities could involve the use of heavy equipment, which could pose a minor ignition risk; however, implementation of MM HAZ-2, which would limit heavy equipment operation, would reduce this risk to less than significant levels.

Cumulative Impacts

Implementation of the proposed Project would result in a minor contribution to the potential for construction related upset and release of hazardous materials. However, given the size of the proposed Project and the limited number of heavy equipment pieces involved in construction-related activities, this impact would be incremental. Additionally, the implementation of MM HAZ-1 and -2, which would require hazard identification and would limit heavy equipment operation, would reduce the Project's contribution to any cumulative impacts to a less than significant level.

Required Mitigation Measures

MM HAZ-1 ***Hazard Identification****: Prior to the issuance of either a grading or land use permit, the Applicant must coordinate with the SBCFD FPD and PHD-EHS to ensure that emergency access and hazards or hazardous materials concerns of FPD and PHD-EHS are addressed.*

Planning Requirements and Timing: Prior to the issuance of either a grading permit or land use permit, the Applicant must demonstrate proof of coordination with FPD and PHD-ESH, including the identification of all potentially hazardous areas on final plans.

Monitoring: City staff must ensure that emergency access and potentially hazardous areas to be avoided are documented on final grading and trail construction plans for the proposed Project.

MM HAZ-2 ***Heavy Equipment Operation****: Heavy equipment must not be operated in open space areas on days when red flag warnings are issued by the SBCFD unless FPD provides an exception given inclusion of construction-related fire suppression measures during trail improvement. Additionally, all equipment used on site must be properly maintained such that no leaks of oil, fuel, or residues take place. Provisions must be in place to remediate any accidental spills. All equipment must only be stored in the appropriate equipment staging areas and construction vehicles must be confined to a pre-defined equipment access path no greater than the minimum width necessary to complete necessary construction activities.*

Plan Requirements and Timing: Prior to issuance of either a grading permit or land use permit, these requirements must be included on final grading and construction plans submitted for approval by the City.

Monitoring: City staff must convey these requirements to trail construction crews during a pre-construction meeting held prior to any trail construction or site preparation activities. Additionally, City staff must periodically monitor for compliance with these requirements on days of high fire hazard.

Residual Impacts

With implementation of MM HAZ-1 and -2, which would require hazard identification and would limit heavy equipment operation, residual Project-specific impacts, as well as the Project's contribution to cumulative impacts, would be less than significant.

Hydrology and Water Quality

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Violate any water quality standards or waste discharge requirements?		×			
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				×	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			×		
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			×		
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			×		
f) Otherwise substantially degrade water quality?		×			
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				×	
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			×		
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?			×		
j) Inundation by seiche, tsunami, or mudflow?			×		

Existing Setting

Regional Hydrology

The Project area is located within the Devereux Creek Watershed, which is bounded by the foothills of the Santa Ynez Mountains to the north, Storke Road and Isla Vista to the east, the Pacific Ocean to the south, and Ellwood Canyon to the west. The watershed encompasses 2,240 acres, and ranges from 0 to 580 feet above msl (UCSB 2010). Lower areas of the watershed are generally urbanized, and the upper reaches consist primarily of native coastal sage scrub, chaparral vegetation, and agricultural lands (City of Goleta 2004). Hydrologic features within the Project area include Devereux Creek, which spans the entire Project area from west to east, and drainages that flow into Devereux Creek. In addition, numerous wetland features (vernal pools) are present in the Project area.

Surface Water

The west branch of Devereux Creek flows through the eastern section of Sandpiper Golf Course before entering the Ellwood Open Space Plan Area. Water flow in Devereux Creek is intermittent and generally lasts no more than a few days beyond any particular rainfall event (City of Goleta 2004). The configuration of the channel is broadly U-shaped with a relatively level bed and gently sloping sides; however, a concrete channel forms the northern bank of the creek downstream east of Coronado Drive (City of Goleta 2004).

Within the Ellwood Mesa Open Space Plan area, there are no other substantial creeks or channels. However, the Project area receives seasonal stormwater flows from development north of Hollister Avenue via two culverts (referred to as Drainages A1 and A2) under Hollister Avenue. Although the two channels formed by these culverts begin over 400 feet apart, they come to a confluence within 1,000 feet south of Hollister Avenue, east of the Comstock Homes Development (The Bluffs). The channel is referred to as Drainage A downstream of the confluence of A1 and A2. From this confluence, a deep gully is formed and flows southeast, joining a tributary to Devereux Creek within the Ellwood Mesa Open Space Plan area (refer to Figure 6). A second gently sloping swale, referred to as Drainage B, also discharges into Devereux Creek at the southern edge of the Comstock Homes Development (The Bluffs), east of Drainage A. Flows in Drainage B are ephemeral and generally contain surface water for brief periods only during rain events. These intermittent aquatic habitats, totaling 1.4 acres, meet the definition of wetlands subject to regulation by the CCC and CDFW; however, only Drainage A1, A2, and A are U.S. Army Corps of Engineers (USACE) jurisdictional wetlands (City of Goleta 2004).

Ponding occurs on the central and southeastern portions of the Ellwood Mesa Open Space Plan Area. Depressions in the surface topography (vernal pools) collect runoff after periods of heavy precipitation. The water remains intermittently in these depressions due to the presence of an impermeable clay layer that typically ranges from 23 to 30 inches below the surface of the ground (City of Goleta 2004). Ponding and associated vernal pool habitats are more fully discussed in the Biological Resources section.

The primary source of water pollution within the Devereux Creek Watershed is associated with untreated runoff from surfaces exposed to rain (City of Goleta 2004). Drainages in the watershed collect animal waste, oil and rubber residue from cars, asbestos and metals from

brake linings, pesticides, silt, and various types of vegetation. These inputs may contain high bacteria counts and viruses that may be toxic to aquatic life.

The County of Santa Barbara's Project Clean Water has taken several samples of water quality in the lower Devereux Creek watershed. Between 1999 and 2001, nine samples were taken at Devereux Creek at the upstream end of the culvert underneath the Ocean Meadows Golf Course service road between the Ocean Meadows Golf Course and Devereux Slough. Analytical results for these samples exceeded applicable water quality standards for pesticides, metals, and bacteria. Additionally, Devereux Creek was recently listed on the 2010 California 303(d) List of Impaired Waters under the Clean Water Act. Approximately, 1.2 miles of the creek are listed for fecal coliform and low dissolved oxygen; however, these pollutants are being addressed through the implementation of USEPA-approved total maximum daily loads (TMDLs), which limit the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards (State Water Resources Control Board [SWRCB] 2010).

Groundwater

The Devereux Creek Watershed is on the south limb of a large anticline exposing a thick section of Tertiary age strata (City of Goleta 2004). The strata consist largely of marine sandstone, siltstone, and shale, but beds of terrestrial origin also occur in the section. The chief aquifers underlying the Project area include the alluvium of Quaternary age and the Monterey Shale, Vaqueros Formation, and Sespe Formation of Tertiary age. In the older undifferentiated formation of Tertiary age, groundwater occurs chiefly in fractures and in beds of loosely cemented sandstone (City of Goleta 2004).

Groundwater recharge to the watershed is primarily derived from the deep infiltration of rainfall. Some recharge, however, is derived by seepage from streams during flood events and by infiltration of water imported to the area for irrigation. Groundwater from the mountainous area moves generally southward in the watershed toward the coast at a steep hydraulic gradient. At the barrier formed by the impermeable mudstone of the Rincon Shale unit, groundwater is seasonally forced to the surface and discharges into upstream tributaries of Devereux Creek and serves as an important source of seasonal flow to Devereux Slough (City of Goleta 2004).

Groundwater studies have been conducted at the Ellwood Mesa site, which have demonstrated that groundwater quality within the Project area is generally poor. The shallow unconsolidated terrace deposits, where petroleum contaminated soils have been found, are located topographically higher than Devereux Creek and do not contain groundwater (City of Goleta 2004). Groundwater in the alluvium and Monterey Shale aquifers do not exhibit evidence of hydrocarbon contamination; however, the groundwater in these aquifers is highly mineralized.

Floodplains

Areas subject to flooding within the Project vicinity include the beach, portions of the Devereux Slough, and the lower reach of Devereux Creek within Ocean Meadows Golf Course (Federal Emergency Management Agency [FEMA] 2012). Within the Ellwood Mesa Open Space Area, the 100-year flood area is closely associated with Devereux Creek as well as the tributary to Devereux Creek that flows through the Coronado Butterfly Preserve (FEMA 2012). The floodplain increases in width from west to east, and is approximately 500 feet in width to the east of the Project area. However, observed high water marks for Devereux Creek suggest that high flows during normal rainfall events do not exceed two to three feet in depth and generally are confined within the creek channel (City of Goleta 2004, 2012).

Tsunamis

Tsunamis, though rare in Santa Barbara County, may be generated by distal sources in other parts of the Pacific Rim, or by coseismic displacements on local faults, such as the Channel Islands Thrust fault system. Local earthquake events may trigger large-scale slope failures in the Santa Barbara Channel that can result in moderate to large local tsunami events. Borrero et al. (2001) determined that purely tectonically generated tsunamis could result in a run-up of approximately seven feet, whereas combinations of tectonic sources and submarine mass movements could generate local tsunami run-up as high as about 50 feet. The California Office of Emergency Services has been provided with a recommended tsunami evacuation zone of 33 feet above sea level for coastal portions of southern Santa Barbara County. While tsunami run-up of 50 feet is theoretically possible (Borrero et al. 2001), tsunami hazard is low within the majority of the Ellwood Mesa Open Space Plan area (City of Goleta 2004).

Thresholds of Significance

A significant impact on hydrology and water quality would be expected to occur if the project resulted in any of the impacts noted in the above checklist. In addition, the City's Thresholds Manual assumes that a significant impact on hydrology and water resources would occur if a project would result in a substantial alteration of existing drainage patterns; alter the course of a stream or river; increase the rate of surface runoff to the extent that flooding, including increased erosion or sedimentation occurs; create or contribute to runoff volumes exceed existing or planned stormwater runoff facilities; or substantially degrade water quality.

Project Specific Impacts

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

b) Any water used during construction activities (e.g., soil watering and habitat restoration) would be imported to the Project site (see *Utilities and Service Systems*). The proposed Project would not require the use of groundwater. Additionally the proposed Project would not measurably interfere with groundwater recharge. Consequently, the proposed Project would have no impact on groundwater underlying the Ellwood Mesa Open Space Area.

c, d) Implementation of the proposed Project would not result in any alteration to the course of Devereux Creek or its tributaries as proposed trail recontouring and construction would be consistent with GP/CLUP Policy OS 5.3(d). However, an 18-inch diameter culvert would be constructed within Gully A, north of Devereux Creek. This channel is

not an active drainage and therefore, installation of the culvert would not interfere with drainage during heavy storm events. Additionally, the proposed Project would result in the removal of the berms along the blufftop segments of the Coastal Trail. These berms would be used for fill which would slightly alter the topography of the blufftop and result in an incremental increase in surface water drainage toward Devereux Creek. However, there would be no substantial long-term increase in the rate or amount of erosion or surface water runoff which would result in flooding of Devereux Creek or its tributaries on- or off-site. Additionally, Drainage A and Devereux Creek would be spanned by boardwalk style crossings that would have beneficial impacts on wetland habitat and drainage (refer to *Biological Resources*). Consequently, these impacts would be less than significant.

e) Implementation of the proposed Project would not result in the construction of impermeable surfaces within the Project area. There would be beneficial impacts associated with the removal of impermeable surfaces (i.e., asphalt) at Beach Access Point E. Additionally, the proposed Project would slightly raise the grade of the Coastal and Anza trails, which would allow water to run off of the trail rather than pond; however, this runoff would likely percolate into the groundwater or flow into Devereux Creek. Consequently, implementation of the proposed Project would not exceed the capacity of any existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, implementation of the proposed Project would result in a less than significant impact.

f) During construction, implementation of the proposed Project would potentially expose the Project area to pollution from construction vehicles. Some common sources of construction site pollution include spilled oil, fuel, and fluids from vehicles and heavy equipment; construction debris; sediment created by erosion; runoff containing pesticides; and materials such as used motor oil or antifreeze. Although a release of hazardous pollutants during trail grading and other construction related activities could be potentially significant, incorporation of MM HAZ-2, which would limit heavy equipment operation, would reduce this impact to less than significant levels.

g) The proposed Project does not include the construction of habitable structures. Consequently, the proposed Project would not locate housing within a 100-year flood hazard area.

h) Implementation of the proposed Project would include the construction of two boardwalk-style crossings across Drainage A and Devereux Creek as well as an 18-inch culvert over Gully A. A drainage analysis was prepared for the proposed Project to address the impacts of the proposed structures on flood flows within Devereux Creek, which has a designated 100-year flood zone (FEMA 2012). FEMA FIRM mapping and 100-year peak flow rates adjacent to the crossing location at Devereux Creek were used to determine the maximum water depth during 100-year peak flow events. The effects of improvements in the floodway were measured by calculating the conveyance of floodwater, as specified in the FEMA Certification Requirements. The conveyance calculation in the drainage analysis revealed that the implementation of the proposed Project would increase conveyance capacity, indicating that there would be no rise in the 100-year storm flow water surface elevation after the construction of the proposed improvements (Flowers & Associates, Inc. 2013).

i, j) There are no levees or dams in the vicinity of the Project area. Additionally, all proposed trail improvements within the flood zone would be constructed pursuant to Goleta Municipal Code § 15.10.160 *Floodplain Management Standards of Construction*. Consequently, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding. While tsunami run-up of 50 feet is theoretically possible (Borrero et al. 2001), tsunami hazard is low within the majority of the Ellwood Mesa Open Space Area (City of Goleta 2004). Consequently, impacts associated with flooding or tsunami hazard would be less than significant.

Cumulative Impacts

Implementation of the proposed Project would result in a minor contribution to the potential for construction-related erosion and impacts to water quality. However, these impacts would be short-term and the implementation of MM WAT-1, -2, -3, and -4, which would require a storm water permit, SWPPP, Notice of Intent, and Notice of Termination, as well as MM HAZ-2, which would limit heavy equipment operation would reduce these impacts to less than significant levels. Consequently, the implementation of the proposed Project would only incrementally contribute to cumulative impacts to hydrology and water quality.

Required Mitigation Measures

MM WAT-1 ***Storm Water Permit***: *The Applicant must submit documentation of a National Pollutant Discharge Elimination System (NPDES) Storm Water Permit from the* California Regional Water Quality Control Board (RWQCB) *or must submit documentation of an exemption from permit requirements.*

Plan Requirements and Timing: The Applicant must submit the documentation of the NPDES permit from the RWQCB to City staff for review and approval prior to the issuance of either a grading permit or land use development permit.

Monitoring: City staff must review the documentation prior to the issuance of either a grading permit or a land use development permit.

MM WAT-2 ***Notice of Intent****: Prior to the initiation of construction or site-preparation activities, the Applicant must file a NOI to the RWQCB pursuant to 40 Code of Federal Regulations (CFR) 122 and Goleta Municipal Code § 15.09.100.*

MM WAT-3 ***Storm Water Pollution Prevention Plan****: The Applicant must prepare a SWPPP in accordance with the guidelines adopted by the State Water Resources Control Board (SWRCB) covering all phases of grading and construction activities and including all requirements of the City's erosion and sediment control plan per Goleta Municipal Code § 15.09.290. The SWPPP must be prepared and submitted, along with final with grading and trail construction plans, to the City prior to the issuance of grading permits.*

Plan Requirements: The SWPPP must be prepared by a licensed civil engineer and incorporate all appropriate City-approved BMPs necessary to mitigate short-term construction impacts and control the discharge of material from the Project site. BMP methods may include, but would not be limited to, the use of temporary detention basins, straw bales, sand bagging, mulching, erosion control blankets, silt fencing, and soil stabilizers.

Monitoring: City staff must review the documentation prior to the issuance of either a grading or land use permit.

MM WAT-4 ***Notice of Termination****: The Applicant must file a notice of termination of construction with the RWQCB implementing a SWPPP closure and identifying how pollution sources were controlled during trail construction activities.*

Residual Impacts

With implementation of MM WAT-1, -2, -3, and -4, which would require a storm water permit, SWPPP, Notice of Intent, and Notice of Termination, residual Project-specific impacts as well as the Project's contribution to cumulative impacts would be less than significant.

Land Use and Planning

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Physically divide an established community?				×	
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for purpose of avoiding or mitigating an environmental effect?			×		
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				×	

Existing Setting

The Project area is located at the southwest end of the City of Goleta, on the South Coast of the County of Santa Barbara, along the south-central coast of California. The Ellwood Mesa Open Space Plan Area is located within the jurisdiction of the City of Goleta and within the Coastal Zone of the State of California. Surrounding land uses include Recreation, Residential, and Industrial land uses to the north, Coal Oil Point Reserve to the east, and Sandpiper Golf Course and the Comstock Homes (The Bluffs) subdivision to the west.

The Project area is a vacant, undeveloped public open space except for a 45-space off-street public parking area at Hollister Avenue (see *Recreation*). The GP/CLUP land use designation of the Project area within the Land Use Element is Open Space/Passive Recreation (REC). According to Land Use Policy LU 9.4, these lands are subject to deed restrictions that require the use of the property to be restricted in perpetuity to passive recreational activities and habitat protection. An extensive coastal access trail system shall be maintained and any trail improvements shall be designed to maintain the natural, low-impact appearance of the existing informal trails (City of Goleta 2006). Related Policy OS 5 requires that the area be managed to

provide coastal access and passive, coastal-dependent recreational opportunities consistent with protection and enhancement of the site's ESHAs and other environmental and scenic resources.

The Project area also falls within an ESHA overlay for riparian corridors and monarch butterfly overwintering habitat (City of Goleta 2006).

Additionally, the Project area is located within the planning boundary of the Airport Land Use Plan (ALUP) prepared by the Santa Barbara County Airport Land Use Commission (ALUC) (Santa Barbara County Association of Governments [SBCAG] 1993). The ALUP addresses compatible land uses in the vicinity of Santa Barbara Airport. The ALUP establishes protection zones and planning boundaries around each airport to ensure public safety and appropriate management of aircraft noise impacts. The Project area is located outside of the General Airport Traffic Pattern Zone, but is located in the Airport Influence Area as identified in the ALUP.

Thresholds of Significance

A significant land use and planning impact would be expected to occur if the project resulted in any of the impacts noted in the above checklist.

Project Specific Impacts

a) Implementation of the proposed Project would result in trail improvements and habitat restoration within the Ellwood Mesa Open Space Plan Area, which is zoned for Recreation (REC) under Chapter 35 Article II of the City of Goleta's Coastal Zoning Ordinance. Consequently, implementation of the proposed Project would be consistent with the zoning designation and would not physically divide an established community.

b) The purpose of the recreation zoning within the Ellwood Mesa Open Space Plan Area is to provide open space for various forms of outdoor recreation. The permitted uses for areas zoned for Recreation (REC) include outdoor public and/or private recreational uses, such as parks, riding, hiking, bike, and walking trails. The proposed Project meets the intent of the zoning designation and all proposed improvements under the Project are permitted uses in the recreation zone. Additionally, the proposed Project would make the trail network more consistent with the City's land use policies as it would realign two segments of the shared Coastal-Anza Trail as well as one segment of the Coastal Trail, consistent with the adopted GP/CLUP alignment (refer to Figure 2). Consequently, the proposed Project would result in a beneficial impact with regard to consistency with the GP/CLUP.

c) The proposed Project would be consistent with the adopted Ellwood-Devereux Open Space and Habitat Management Plan and would not conflict with any other applicable habitat conservation plans or natural community conservation plans. Additionally, the proposed Project would be consistent with GP/CLUP Policy LU 6.2, which describes the intent of open space/passive recreation areas to preserve and enhance areas with significant environmental values or resources.

Cumulative Impacts

Implementation of the proposed Project would not result in any adverse impacts to land use within the Project area. As previously discussed, the proposed Project would realign two

segments of the existing trail system, which would make them consistent with the GP/CLUP and the California Coastal Act and would, therefore, result in a minor beneficial impact to land use. Therefore, any minor contribution to cumulative impacts associated with the proposed Project at Ellwood Mesa would be beneficial.

Required Mitigation Measures

The impacts associated with Project would be beneficial; therefore, no mitigation measures are required or recommended.

Residual Impacts

There would be no adverse residual impacts associated within implementation of the proposed Project.

Mineral Resources

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				×	
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				×	

Existing Setting

As described under Hazards and Hazardous Materials, the Ellwood Oil Field was historically one of the most productive oil fields in the area. The boundaries of the Ellwood Oil Field, as well as other gas fields, are within and in the vicinity of the Project area; however, the onshore portions of these sites are no longer used for petroleum or gas extraction. No known economically recoverable mineral resources are located within the Ellwood Mesa Open Space Plan Area under the jurisdiction of the City of Goleta (City of Goleta 2004; Santa Barbara County Energy Division 1998).

The Ellwood Marine Terminal, operated by Venoco, is located adjacent to the west of the Project area, occupies 17.5 acres, and receives and stores crude oil.

The Ellwood Marine Terminal, located to the east of the Project area, has been operational since the early 1930s and consists of a network of former and active tanks, pipelines, roads, buildings, ponds/sumps, and other oil related ancillary facilities. However, the facility is no longer active and is scheduled to be removed when the current lease with the University expires.

In addition, California State Lands Commission lease PRC 421 historically tapped the Ellwood Oil Field from wells located on the beach near Venoco's Ellwood Onshore Facility. Venoco currently has an application pending for the resumption of production from this lease.

Thresholds of Significance

A significant impact on mineral resources would be expected to occur if the project resulted in any of the impacts noted in the checklist above.

Project Specific Impacts

a, b) As previously discussed, no known economically recoverable mineral resources are located within the Ellwood Mesa Open Space Plan Area under the jurisdiction of the City of Goleta (City of Goleta 2004; Santa Barbara County Energy Division 1998). Further, the Project area is not designated under GP/CLUP as an important mineral resources recovery site (City of Goleta 2006). Consequently, the proposed Project would not be expected to impact mineral resources (City of Goleta 2004).

Cumulative Impacts

The proposed Project would not contribute to cumulative impacts associated with mineral resources.

Required Mitigation Measures

No mitigation measures are required or recommended for the proposed Project.

Residual Impacts

As implementation of the proposed Project would not be expected to adversely impact mineral resources, there would be no residual impacts as a result of the proposed trail improvements and habitat restoration.

Noise

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			×		
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			×		
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				×	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		×			
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			×		
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				×	

Existing Setting

The most common approach to describe varying noise levels is to define the Equivalent Noise Level (Leq) for a specific period of time. The Leq is a single value that represents the same total sound energy as a varying noise during the same time period. Leq values are usually computed for one-hour periods, but longer or shorter time periods may be specified. Roadway noise is evaluated as the Day-Night Average Noise Level (Ldn), expressed as decibels using the A-weighted frequency distribution that duplicates the response of the human ear (dBA). The Ldn is a 24-hour average noise level based on hourly equivalent noise levels during the daytime and nighttime periods. The measure includes an adjustment or penalty of an extra ten decibels during the nighttime hours to account for the added nuisance of noise during this period. The Ldn is similar to the Community Noise Equivalent Level (CNEL), which includes an additional penalty for noise during the evening hours. The limit of acceptable noise exposure for sensitive noise receptors within an open space area is typically 60 dBA per GP/CLUP (City of Goleta 2006).

The trailhead parking lot is located just south of Hollister Avenue, which is the primary source of noise in the vicinity of the Project area. However, further south of Hollister Avenue, Ellwood Mesa experiences noise levels less than 58 dBA CNEL.

The primary noise source in the vicinity of the trailhead is roadway traffic on Hollister Avenue and U.S. Highway 101 to the north. Additional contributors to the noise environment include trains as well as airplanes in the vicinity of the Project area. Based on an average daily traffic (ADT) volume of 6,500 on Hollister Avenue adjacent to the Project area, the CNEL at 50 feet from the center of the roadway is approximately 66 dBA (City of Goleta 2004). Consequently, only the first 200 feet of the shared Coastal-Anza Trail closest to Hollister Avenue experience CNEL values up to 65 dBA (City of Goleta 2004, 2009). The remaining portions of the Ellwood Mesa Open Space Plan Area to the south exhibit quieter noise levels, consistent with Policy NE 1 of the City's GP/CLUP.

The City's GP/CLUP Noise Element indicates that the maximum noise levels from passing trains reach approximately 96 dBA to 100 dBA at a distance of 100 feet from the tracks (City of Goleta 2006). The average CNEL values at 100 feet from the tracks range between 70 and 75 dBA and the distance to the 65 dBA CNEL contour ranges from approximately 315 to 1,000 feet (City of Goleta 2004). Consequently, the northern portion of the Ellwood Mesa Open Space Plan Area contains CNEL values that range from approximately 61 to 66 dBA. However, approximately 200 feet south of the northern boundary, the CNEL values drop to a range of 60 to 65 dBA (City of Goleta 2004).

The Santa Barbara Airport is located approximately 2.5 miles to the east of the Project area. Runway 7-25 is oriented in an east-west direction and is the primary runway used by commercial flights at the airport. Most departures use Runway 25, and fly toward the west, passing over the property, or turn to the south before reaching this area. The northern region of the Project area, in the vicinity of the Comstock Homes Development (The Bluffs), is located approximately 4,500 feet west of the western point of the 60 dBA CNEL contour for the airport (City of Goleta 2004). Although this location is well outside of the 60 dBA CNEL contour and nearly two miles from the western edge of the airport itself, aircraft departing toward the west are audible. Typical aircraft overflight noise levels measured at this distance from the airport range from 60 to 65 dBA for short periods. At its closest point, along its eastern boundary, the Project area lies approximately 3,000 feet outside of the 60 dBA CNEL contour of the Santa Barbara Airport. (City of Goleta 2004).

Thresholds of Significance

A significant noise impact would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additional thresholds are contained in the City's Thresholds Manual. The City's adopted thresholds assume that outdoor CNEL noise levels in excess of 65 dBA are considered potentially significant noise impacts on sensitive receptors.

Project Specific Impacts

Construction Related Impacts

b) The proposed Project would not expose neighboring sensitive receptors to excessive groundborne vibration or groundborne noise levels since construction associated with the trail improvements would be limited primarily to minor excavation and recontouring. Additionally, the construction of improvements, including the culvert over Gully A, small boardwalk crossings over Drainage A and Devereux Creek, and steps at Beach Access Point F, would not require techniques that would generate a substantial amount of groundborne vibration or noise, such as the driving of foundation piles. Consequently, there would be a less than significant impact associated with groundborne noise and vibration on sensitive receptors in the area.

d) Construction activities associated with implementation of the proposed Project would occur throughout the Ellwood Mesa Space Open Plan Area along the California Coastal Trail and Anza Trail corridors as well as at Beach Access Points E and F. During the proposed three-month construction period, construction noise would be generated from excavation and grading activities as well as construction associated with the drainage crossings and steps at Access Point F. The City's Thresholds Manual notes construction noise poses a potentially significant impact on sensitive receptors if such receptors are within 1,600 feet of the construction site. Noise associated with heavy equipment operation and construction activities can average as high as 95 dB or more measured 50 feet from the source. The construction of the drainage crossings would occur within 200 feet of the nearest residents within the Comstock Homes Development (The Bluffs). Consequently, sensitive receptors within this residential neighborhood may hear peak noise levels exceeding 65 dBA during construction of the crossings. Additionally, open space users visiting in the area during excavation and grading activities may also be exposed to noise levels exceeding 65 dBA. However, these noise levels would be reduced through the implementation of BMPs. Consequently, impacts associated with construction noise would be less than significant with implementation of MM NOI-1, -2, and -3, which would limit construction timing, shield noise, and implement BMPs.

Operational Noise Impacts

a, c) As previously discussed, the limit of acceptable noise exposure for sensitive noise receptors within an open space area is typically 60 dBA per the Noise Element of the GP/CLUP (City of Goleta 2006). The Project area experiences maximum CNEL values of approximately 64 dBA near Hollister Avenue, where the 65 dBA noise contour covers approximately 1.5 acres, including Sperling Parking Lot (City of Goleta 2004). However, the remaining portions of the Ellwood Mesa Open Space Plan Area to the south exhibit much quieter noise levels within the 60 dBA threshold (City of Goleta 2004, 2009a). No new long-term sources of noise would be anticipated under the proposed Project, which

is limited to trail improvements and habitat restoration that would be consistent with the Ellwood Mesa Open Space Plan. The Ellwood Mesa Open Space Plan is intended to promote passive recreational use consistent with existing use land use patterns. Consequently, no new future noise generating activities are anticipated as a result of continued long-term public use of the Project area (City of Goleta 2004). Further, there would be a less than significant impact with regard to the exposure of persons (i.e., trail users) to noise levels in excess of the standards described in the GP/CLUP as almost all of the Ellwood Mesa Open Space Area, except for the northernmost 1.5 acres, is located outside of the 65 dBA noise contour.

e) The Ellwood Mesa Open Space Area is located outside of the Santa Barbara Municipal Airport Approach Zone and approximately 3,000 feet outside of the 60 dBA contour associated with the airport. As with the other parcels in the area, this area is also subject to noise from aircraft departing towards the west from the Santa Barbara Airport. For relatively short periods, aircraft noise levels may range generally from 60 to 65 dBA in this area; however, occasional noise intrusions for open space users are considered less than significant as Ellwood Mesa experiences average noise levels below the 60dBA threshold for sensitive receptors.

f) There are no private airstrips within the vicinity of the Project site.

Cumulative Impacts

Implementation of the proposed Project would result in an incremental contribution to cumulative construction-related noise. However, with implementation of MM NOI-1, -2, and -3, which would limit construction timing, shield noise, and implement BMPs. the proposed Project's contribution would be minor. Additionally, noise as result of construction-related activity would be short-term and no long-term increases in noise would result.

Required Mitigation Measures

MM NOI-1 ***Construction Timing****: The operation or maintenance of heavy construction equipment within 500 feet of residential developments must be limited to the maximum extent feasible. Additionally, the operation or maintenance of heavy construction equipment must not occur in this area on State holidays (e.g., Thanksgiving, Labor Day).*

Plan Requirements and Timing: One sign stating these restrictions must be provided by the Applicant and posted on site. This requirement must be printed on final grading and construction plans prior to the issuance of either a grading permit or a land use development permit. The sign must be in place prior to beginning of and throughout grading and construction activities**.**

Monitoring: City staff must convey these requirements to trail construction crews during a pre-construction meeting held prior to the commencement of any construction or site-preparation activities. City staff must also conduct periodic field inspections to verify compliance during construction activities.

MM NOI-2 ***Construction Equipment****: Stationary construction equipment used on the northern segments of the shared Coastal-Anza Trail that would generate noise in excess of 65 dBA at the Project boundaries must be shielded and located as far*

towards the interior of the construction site as practical to minimize the noise levels at the Comstock Homes Development (The Bluffs) and the golf course to the west.

Plan Requirements and Timing: The equipment area must be designated on final grading and trail construction plans. Equipment and shielding must remain in the designated location throughout construction activities.

Monitoring: City staff or designee must conduct periodic field inspections to verify compliance during construction activities.

MM NOI-3 ***Best Management Practices (BMPs)****: The following measures must be incorporated into final grading and trail construction plans to reduce the impact of construction noise per GP/CLUP Policy NE 6.5:*

- *The Applicant must ensure that construction equipment is properly muffled according to manufacturer's specifications or as required by the City, whichever is more stringent.*
- *The Applicant must place noise-generating construction equipment and locate construction staging areas away from noise-sensitive activities, where feasible, to the satisfaction of City staff.*
- *The Applicant must implement noise attenuation measures which may include, but are not limited to, changing the location of stationary construction equipment, shutting off idling equipment, and installing acoustic barriers around significant sources of stationary construction noise.*

Plan Requirements and Timing: Final grading and trail construction plans must identify BMPs to be implemented during construction. BMPs must be identified and described for submittal to City staff for review and approval prior to the issuance of either a grading permit or land use permit. BMPs must be adhered to for the duration of the Project.

Monitoring: City staff must convey these requirements to trail construction crews during a pre-construction meeting held prior to the commencement of any construction or site-preparation activities. City staff must also conduct periodic field inspections to verify compliance during construction activities.

Residual Impacts

During trail construction activities, residual impacts associated with construction-related noise would remain; however, these impacts would be short-term and less than significant with the incorporation of MM NOI-1, -2, and -3, which would limit construction timing, shield noise, and implement BMPs.

Public Services

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of these public services:					
i. Fire protection?				×	
ii. Police protection?				×	
iii. Schools?				×	
iv. Parks?				×	
v. Other public facilities?				×	

Existing Setting

The Project area is served by the City of Goleta Police Department (contracted by Santa Barbara County Sheriff's Department), which has a jurisdiction that covers over 2,744 square miles, including 118 miles of coastline (Santa Barbara Sheriff's Department 2007). The Sheriff's Department currently provides law enforcement services to the incorporated area in the Project vicinity via a mutual services agreement with the City of Goleta. The Sheriff's Department has a staff of approximately 30 sworn peace officers in the incorporated area of Goleta. The main station is located at 4434 Calle Real in Goleta and is staffed with 32 full time staff (Santa Barbara Sheriff's Department 2013). The Sheriff's Department's service area includes unincorporated areas from Gaviota in the north. The Sheriff's Department tries to maintain an officer-to-population ratio of 1:1,200; an optimal ratio would be 1:1,000. This ratio rises and falls with the Sheriff's Department budget. The Department reports a relatively low level of calls from the area, with most calls related to domestic or neighborhood disputes. The Sheriff's Department has not identified any unusual issues relating to the Project area. Additionally, the overall crime rate in Santa Barbara County has dropped in recent years, reflecting the trend across the state (City of Goleta 2004).

Fire Department

The Santa Barbara County Fire Department (SBCFD) provides fire protection services to the Project area under contract with the City of Goleta. Stations Number 11, 12, 14, and 17 currently provide service in the Project area. The station closest to the Ellwood Mesa Open Space Plan Area is Station 11, which is located on Storke Road and serves as the primary response unit. Station 11 has an engine company with a staff of three personnel, consisting of an engine company captain, engineer, and firefighter (City of Goleta 2004). This engine company provides immediate response on incidents as determined by the type of call. Station

11 also houses a truck company (i.e., ladder truck), which is staffed with three additional personnel. This truck company is designated a countywide emergency response rescue vehicle and is not solely dedicated to serve Station 11. As such, Truck Company 11 is not relied on to provide immediate response for the service population in the Station 11 district (City of Goleta 2012a).

The SBCFD serves an area of approximately 2,700 square miles and includes the unincorporated sections of the County. The SBCFD is comprised of 15 fire stations. In general, all firefighters are trained as emergency medical technicians. Criteria used to determine adequacy of fire protection services include a five-minute response time, ratio of firefighters to population, and the population served.

The five-minute response standard is used for urban areas, and refers to the time it takes for a unit to reach a call and set up equipment after leaving the station. Response times under five minutes are considered adequate and over five minutes are substandard. Response time from Fire Station 11 to the Project area is typically within five minutes (City of Goleta 2012a).

Schools

Public education services are provided within Goleta and the remainder of the Goleta Valley by the Goleta Union School District (GUSD) and the Santa Barbara Unified School District (SBUSD). These schools include Isla Vista Elementary School at 6875 El Colegio Road, Ellwood Elementary School at 7686 Hollister Avenue, Goleta Valley Junior High School at 6100 Stow Canyon Road, and Dos Pueblos High School at 7266 Alameda Avenue (City of Goleta 2012b).

Ellwood Elementary school is located north of Hollister Avenue adjacent to the Project site.

Thresholds of Significance

A significant impact on public services would be expected to occur if the project resulted in any of the impacts noted in the above checklist. While the National Fire Protection Association (NFPA) and SBCFD criteria shown above are not adopted thresholds of significance, they provide a guideline for determining significance. In addition, the City's Thresholds Manual includes thresholds of significance for potential impacts on area schools. Specifically, under these thresholds any project that would generate enough students to generate the need for an additional classroom using current State standards, would be considered to result in a significant impact on area schools.

Project Specific Impacts

a) Implementation of the proposed Project would be limited to trail restoration improvements to an existing area designated for recreation, which may enhance existing conditions but would not generate significant new demand for public services. There would be no provision of new government facilities that would necessitate additional public services (e.g., fire protection, police protection, schools, parks, etc.). Therefore, implementation of the proposed Project would not result in impacts to public services.

Cumulative Impacts

The proposed Project would not contribute to cumulative impacts associated with public services.

Required Mitigation Measures

No mitigation measures are required or recommended for the proposed Project.

Residual Impacts

There would be no residual impacts to public services as a result of the proposed Project.

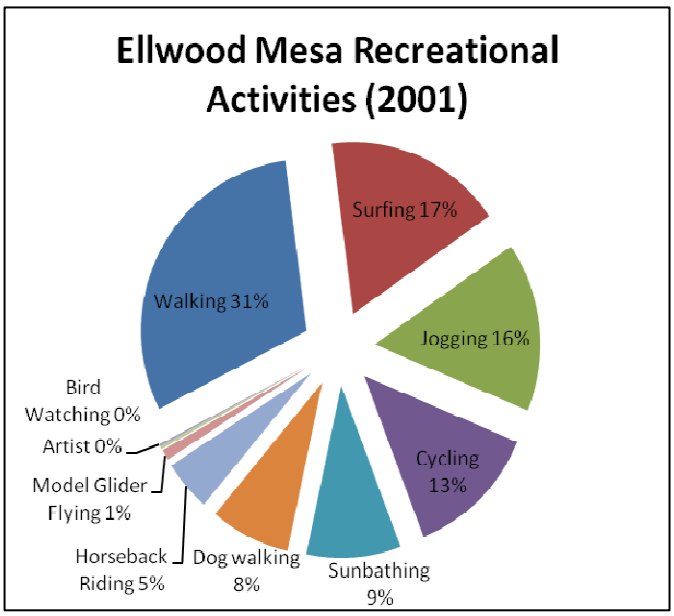
Recreation

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

Existing Setting

The Project area under the jurisdiction of the City of Goleta is a multiple-use, passive recreation area. Ellwood Mesa and the greater Devereux Slough ecosystem are in close proximity to the communities of Goleta and Isla Vista. Additionally, Ellwood Mesa provides two coastal access points, which also attracts visitors. Recreational activities currently take place over most of the proposed Ellwood Mesa Open Space Plan Area; however, these activities vary according to season as fewer recreational users utilize Ellwood Mesa during wet periods (City of Goleta 2004).

In September and October 2001, a visitor count and data from a survey questionnaire were gathered by public agency staff. Respondents to the survey questionnaire were asked to rank the importance of a variety of the area's uses. Walking was ranked by 78 percent of the respondents as a very important activity, followed by dog-walking, jogging, biking, and sunbathing with each being ranked as important by about one-third of survey respondents (City of Goleta 2004). The survey response indicated that there are diverse users of the Ellwood Mesa Open Space Plan Area, with walkers characterized as the most dominant user group.



Parking for recreational users is provided by Sperling Parking Lot, which includes 45 parking spaces, including 3 handicapped spaces. A trailhead restroom is also located within the parking lot. Further, the main trailhead access point contains a dog "mutt mitt station", trash receptacles, signage, and a "Save Ellwood Mesa" brochure box. The parking area is surrounded by a split-rail wood fence and gate with hours posted at the entrance. Signage prohibits motorcycle and motorized vehicle uses on the property. Signs are also in place to identify priority public uses of the area (i.e., which trails are appropriate for equestrian use and/or hiking)

Many walkers, joggers, cyclists, and surfers access Ellwood Mesa via the Sperling Parking Lot, which provides 45 parking spaces as well as a trailhead restroom.

The Coronado Butterfly Preserve, which is located within the Ellwood neighborhood on Coronado Drive, is a major attraction at Ellwood Mesa. The Preserve entrance provides a connection to the Coronado Open Space Trail that leads towards the Ellwood Main Monarch Grove (Goleta Butterfly Grove) via a footbridge over a tributary of Devereux Creek. The Ellwood Main Monarch Grove is a 217-acre site that consists of undeveloped open space that can be accessed by an existing trail network via foot, bike, or horse along several trails. There are two main butterfly viewing areas currently protected by a low-profile rope fence, with posted signs prohibiting horses and bicycles, and signage advising visitors on appropriate use of the area. This area is heavily used by hikers during the peak butterfly season.

Several major north-south and east-west oriented trails, including the Coastal Trail and the Anza Trail, currently exist on Ellwood Mesa. These trails cross Devereux Creek or tributaries to the creek at different locations and provide access across the mesa. Several interconnected, unimproved trails are also located on the Ellwood Mesa, which provide informal access between

the Coastal and Anza trails. In addition, two coastal access trails (i.e., Beach Access Point E and F) are provided off of the Coastal Trail along the bluff. These trails provide access to Ellwood Beach at the base of the bluffs. Ellwood Beach is used by equestrian operators and tours that serve the Bacara Resort and Spa. Signage is located at Access Point D (on University-owned land) requesting that equestrian users remain out of the critical habitat designation area for the western snowy plover located near this access point.

Thresholds of Significance

A significant impact on Recreation would be expected to occur if the proposed project resulted in any of the impacts noted in the above checklist.

Project Specific Impacts

a) Implementation of the proposed Project would result in improvements to the Coastal and Anza trails, including the beach access points on Ellwood Mesa. The proposed Project would recontour the trail system to create safer access on Ellwood Mesa. Additionally, the proposed Project would remove the degraded asphalt road at Beach Access Point E and install steps at Beach Access Point F, which would reduce surface water runoff and improve access to Ellwood Beach at the base of the bluffs, consistent with Sections 30210 and 30211 of the California Coastal Act. The proposed Project would not include the construction of additional parking spaces or additional facilities that would directly accommodate more visitors. The Ellwood Open Space Area is managed for passive recreation activities. Therefore, by maintaining these activities, there would be a less than significant impact with regard to use of the Ellwood Mesa Open Space Plan Area following implementation of the proposed Project.

   Implementation of the proposed Project would result in a beneficial impact to the Ellwood Mesa Open Space Area trail network, as the Coastal and Anza trails are currently degraded by persistent water erosion, ponding, and trail braiding. The proposed Project would recontour and slightly elevate the trail surfaces allowing water to run off rather than pond, which indirectly results in trail braiding as trail users avoid the puddles. Additionally, the proposed Project would remove the berms at the borrow pit locations, which currently direct surface water toward the blufftop, contributing to blufftop erosion. Further, the proposed Project would include drainage improvements at both of the beach access points. These improvements would reduce erosion within the Project area and improve the overall condition of the trail network. The Project would also include the installation of drainage crossings, including boardwalk style crossings across Devereux Creek and Drainage A. These improvements would increase access across the Ellwood Mesa Open Space Area as they would ensure that the trails have safer accessibility.

   As previously discussed in the *Land Use and Planning* section, these improvements would be consistent with the area's land use designation for recreation. The proposed Project would assure the long-term availability of this coastal property for public recreational use. Consequently, the proposed Project would have a beneficial impact to recreation.

b) As previously discussed, implementation of the proposed Project would result in long-term improvements to the existing trail system on Ellwood Mesa. However, implementation of the proposed Project would result in potentially adverse short-term construction impacts, including temporary closure of some trail segments during the

proposed three-month construction period as well as short-term effects upon biological resources, hydrology and water quality, and geological resources. However, implementation of MM REC-1, which would require a Construction-related Temporary Trail Closure Plan, in addition to those required for the other resource areas, would reduce construction-related impacts to less than significant levels.

Long-term beneficial impacts on the Ellwood Mesa Open Space Area would include the overall reduction in erosion associated with the trail network including the removal of the berms which direct surface water flow toward to the blufftops. Additionally, the proposed Project would improve the quality of ESHA, consistent with the intent of GP/CLUP Policy OS 5.4, as it would include habitat restoration along the trail corridor and realignment of the Coastal and Anza trails per the GP/CLUP to avoid sensitive riparian and southern vernal pool habitat.

Consequently, while the proposed Project would result in short-term impacts that would be less than significant with the incorporation of mitigation measures, the trail improvements and habitat restoration associated with the proposed Project would result in long-term beneficial impacts to the physical environment.

Cumulative Impacts

The proposed Project, in combination with other proposed projects and a general increase in population and use intensity in the Ellwood Mesa Open Space Plan Area, could cumulatively add to a long-term trend of increased public use, access or activities in the Ellwood-Devereux Open Space Plan Area. However, implementation of the proposed Project would not result in the construction of new parking spaces or other facilities that would directly induce additional use of Ellwood Mesa Open Space Area. Implementation of the Open Space Plan would include measures (e.g., defined trails, trail maintenance, and interpretive/educational signs and trailhead information) designed to increase public awareness and appreciation of natural, cultural, and recreational resources, thus partially offsetting this impact by reducing the risk of unintentional or intentional deterioration of recreational resources. Consequently, implementation of the proposed Project would not contribute to considerable long-term adverse cumulative impacts.

Required Mitigation Measures

Mitigation measures previously discussed for the proposed Project, including MM BIO-1 and -2, MM WAT-1, -2, -3-, and -4, and MM GEO-1, -2, and -3 would reduce the effect of the proposed Project on recreation resources to a less than significant level. Additionally, MM REC-1 would ensure public access to the beach from Ellwood Mesa throughout trail-construction activities.

MM REC-1 ***Construction-related Temporary Trail Closure Plan****: The Applicant must prepare a construction-related temporary trail closure plan, which must outline construction timing and the duration of necessary construction-related temporary trail closures. Temporary trail closures must be limited to the maximum extent feasible during trail construction and habitat restoration activities. Areas that necessitate temporary closure for trail recontouring must be roped off to protect public safety in these areas. During construction of the shared Coastal-Anza Trail realignment, safe access to Ellwood Mesa must be provided via another route. Similarly, beach access point improvements must not be constructed simultaneously; at least one access point must remain open at all times.*

Plan Requirements and Timing. The Trail Closure Plan must be reviewed and approved by the City of Goleta prior to issuance of either a grading permit or land use permit.

Monitoring. The City of Goleta will conduct additional site investigations, as appropriate.

Residual Impacts

During trail construction activities, residual impacts associated with construction-related activities would remain; however, these impacts would be short-term and less than significant with the incorporation of MM REC-1, which would ensure public access to the beach from Ellwood Mesa throughout trail-construction activities, as well as the mitigation measures discussed for the other resource areas.

Transportation and Traffic

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?		×			
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?			×		
c) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			×		
d) Conflict with and applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			×		

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
e) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				×	
f) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				×	
g) Result in inadequate emergency access?		×			
h) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety or such facilities?				×	

Existing Setting

The circulation system in the vicinity of Ellwood Mesa is comprised of regional highways, arterial streets, and collector streets. The principal components of this street network include U.S. Highway 101, Storke Road, Winchester Canyon Road, and Hollister Avenue.

Within Santa Barbara County, U.S. Highway 101 is a four to six-lane highway providing access between the City of Goleta and the cities of Santa Barbara, Carpinteria, and Ventura to the south as well as Buellton and Santa Maria to the north. Primary access between U.S. Highway 101 and Ellwood Mesa is provided via the Hollister Avenue-Winchester Canyon Road interchange to the west, with secondary access provided via the Storke Road interchange to the east (City of Goleta 2004). The U.S. Highway 101/ Hollister Avenue interchange is controlled by stop signs, and the U.S. Highway 101/Glenn Annie Road intersection is signalized. Hollister Avenue is a two- to four-lane arterial street which serves as the major east-west surface street route in the Goleta area. Hollister Avenue extends to the east from its terminus at the U.S. Highway 101 interchange adjacent to Winchester Canyon Road through the City of Goleta. East of the Goleta area, Hollister Avenue connects to State Street, which extends into the City of Santa Barbara. West of Storke Road, Hollister Avenue extends as a four-lane arterial with left turn lanes to Pebble Beach Drive, where it narrows to two lanes. Within the immediate vicinity of the Project area, Hollister Avenue is signalized at Storke Road/Marketplace Drive, Pacific Oaks Road, Entrance Road, and Ellwood School. The intersections within the immediate vicinity of the Project area all operate at Level of Service (LOS) C or better, except for the intersection of Storke Road and Hollister Avenue, which operates at LOS D during the p.m. peak hour according to the Transportation Element of the City's GP/CLUP (City of Goleta 2006).

The Project area is also served by Metropolitan Transit District (MTD) Bus Line 25, which provides a connection between the Project area, the Camino Real Marketplace, and the University. MTD bus stops are located on the north and south side of Hollister Avenue at Palo Alto Drive, Santa Barbara Shores Drive, Viajero Drive, and the Sandpiper Golf Course, with service provided every 60 minutes. Connections to downtown Goleta and downtown Santa

Barbara are provided via additional MTD bus lines that connect to Bus Line 25 at the Camino Real Marketplace and University transfer stations.

Additionally, a Class II bike lane is present on Hollister Avenue from the U.S. Highway 101/Hollister Avenue interchange to beyond the east of Storke Road. Curb, gutter, and sidewalks are also constructed along the south side of Hollister Avenue eastward from Santa Barbara Shores Drive to Storke Road. On the north side, curb, gutter, and sidewalk are partially provided between Pacific Oaks Road and Viajero Drive (City of Goleta 2004).

Thresholds of Significance

A significant project generated traffic impact would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additional thresholds of significance are set forth in the City's Thresholds Manual and include the following:

1) The addition of project traffic to an intersection increases the volume to capacity (V/C) ratio by the value provided below or sends at least five, ten, or 15 trips to intersections operating at LOS F, E or D respectively.

Table 8: City of Goleta Transportation and Traffic Thresholds

Level of Service (including the project)	Increase in V/C
A	> .20
B	> .15
C	> .10
Or the Addition of	
D	15 trips
E	10 trips
F	5 trips

2) Project access to a major road or arterial road would require a driveway that would create an unsafe situation or a new traffic signal or major revisions to an existing traffic signal.

3) Project adds traffic to a roadway that has design features (e.g. narrow width, road side ditches, sharp curves, poor sight distance, inadequate pavement structure) or receives use which would be incompatible with a substantial increase in traffic (e.g. rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use, etc.) that will become potential safety problems with the addition of project or cumulative traffic.

4) Project traffic would utilize a substantial portion of an intersection(s) capacity where the intersection is currently operating at acceptable levels of service (A-C) but with cumulative traffic would degrade to or approach LOS D (V/C 0.81) or lower. Substantial is defined as a minimum change of 0.03 for intersections which would operate from 0.80

to 0.85 and a change of 0.02 for intersections which would operate from 0.86 to 0.90, and 0.01 for intersections operating at anything lower.

Project Specific Impacts

a, c, d) During construction, implementation of the proposed Project would potentially result in an incremental increase in traffic along Hollister Avenue and a minor reduction in available parking spaces at Sperling Parking Lot associated with the presence of construction workers and construction equipment. Additionally, a limited number of haul truck (e.g., pick-up truck) trips would be required to transport approximately 15 cubic yards of degraded asphalt to the granite recycling facility at 5335 Debbie Lane. The haul route from the Project site would follow Hollister Avenue east to Patterson Avenue, where it would turn toward south to access the site. However, construction related transportation impacts would be short-term and would not result in substantial changes to circulation or available parking within the vicinity of the Ellwood Open Space Area. Implementation of MM TT-1 and -2, which would require a traffic and pedestrian management plan and a construction schedule, would reduce this short-term impact to less than significant levels.

Additionally, implementation of the proposed Project would not result in any substantial long-term changes to transportation within the Project vicinity. The Project does not include any changes to the transportation network or increases in available parking that would result in congestion or increased trip generation rates. Consequently, the proposed Project would not conflict with any applicable plans or policies regarding the effectiveness or performance of the circulation system. Additionally, the proposed Project would not conflict with the 2009 Santa Barbara County Congestion Management Program, a transportation planning program that emphasizes projects aimed at congestion relief (SBCAG 2009).

b) As described previously in *Land Use and Planning*, the Project area is located within the planning boundary of the ALUP prepared by the Santa Barbara County ALUC (SBCAG 1993). However, implementation of the proposed Project would have no impact on air traffic patterns. Additionally, implementation of the proposed Project would not result in increases to safety risks associated with air travel.

c) The proposed Project would not result in long-term changes to the layout of the transportation network. Consequently, the proposed Project would not result in any increased hazards due to design features or incompatible uses.

d) Emergency access within the Ellwood Mesa Open Space Plan Area is provided by Santa Barbara Shores Drive, which accesses the Project area from the north. During excavation and recontouring activities, implementation of the proposed Project could result in heavy equipment blocking access to the bluff approximately 250 feet south of where Santa Barbara Shores Drives becomes a dirt road. This could potentially result in safety hazards during construction; however these impacts would be less than significant with the incorporation of MM HAZ-1, which requires hazard identification.

e) Implementation of the proposed Project would not conflict with adopted policies or plans regarding public transit. However, the proposed Project, specifically trail improvements along the Coastal and Anza trails on Ellwood Mesa, would constitute improvements to pedestrian facilities consistent with Policy TE 10, which encourages increased walking for recreational and other purposes. Implementation of the proposed Project would

improve safety and access throughout the trail corridor, particularly at the drainage crossings and beach access points.

Cumulative Impacts

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

Required Mitigation Measures

MM TT-1 ***Traffic and Pedestrian Management Plan****: The Applicant must prepare a Traffic and Pedestrian Management Plan that must include, but not be limited to, designated construction worker vehicle parking and access routes, maintenance of clear trail routes (e.g., with signage) on Ellwood Mesa during construction activities, maintenance of at least one beach access point route at all times during construction, nightly removal of equipment to a designated area. The City must also provide the public with contact information in order to report immediate hazards related to the Project. This information must be provided in a public notice posted prominently on-site prior to the commencement of any Project-related activities.*

Plan Requirements and Timing: Prior to the issuance of either a grading permit or land use permit, the Applicant must prepare a Traffic Management Plan and submit it for review and approval by City staff.

Monitoring: City staff must verify compliance prior to issuance of either a grading or land use permit as well as periodically monitor for compliance with the approved Traffic and Pedestrian Management Plan during construction.

MM TT-2 ***Construction Schedule****: The Applicant must provide Ellwood Elementary School with a construction activity schedule and construction routes as well as the name and telephone number of a contact person responsible for the construction schedule no less than 14 days in advance of commencement of construction activities. Any alterations or additions must require a minimum seven day notification.*

Plan Requirements and Timing: The Applicant must submit a copy of the schedule to City staff no less than 14 days prior to initiation of any earth movement. The plan must schedule truck hauling trips to avoid peak traffic hours if feasible (peak hours defined as 7:30 - 8:30 a.m. and 4:30 - 5:30 p.m.).

Monitoring: City staff must perform periodic site inspections to verify compliance with activity schedules.

Residual Impacts

With implementation of MM TT-1 and -2, which would require a traffic and pedestrian management plan and a construction schedule, residual Project-specific impacts as well as the Project's contribution to cumulative impacts would be less than significant.

Utilities and Service Systems

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				×	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				×	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				×	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?				×	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				×	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			×		
g) Comply with federal, state, and local statutes and regulations related to solid waste?			×		

Existing Setting

Several streets in the Project area, including Storke Road and Hollister Avenue, provide utility corridors for water, sewer, stormwater, electricity, natural gas, and communications lines. Potable and reclaimed water mains are located under both Hollister Avenue and Storke Road, including a 12-inch main that runs down Hollister (City of Goleta 2004). Aboveground utilities in this area include electrical lines and associated power poles along the west side of Storke

Road. Storm drains and culverts are located at various locations throughout the Project area. The Goleta Water District provides potable and reclaimed water to the Project area (City of Goleta 2004). The District serves the University, the unincorporated area between Santa Barbara and Goleta, Santa Barbara, the Santa Barbara Airport, schools, recreational facilities, and the City of Goleta. The District produces water from a variety of sources, including the Cachuma Project, recycled water, State Water Project (SWP) water, and groundwater (City of Goleta 2004).

The Project area is bisected from east to west by a buried 24-inch sanitary sewer trunk line. The Goleta West Sanitary District (GWSD) line is located along the lowlands adjacent to Devereux Creek and includes associated manholes located on the north bank of Devereux Creek. The Devereux Creek main trunk line traverses the Project area and Ocean Meadows Golf Course to Storke Road (City of Goleta 2004) and handles existing sewer service from the residential communities located south of Hollister. Further, another main trunk line traverses Hollister Avenue to the north of the Project area.

Municipal sanitary waste flows to the Goleta Sanitary District's (GSD) Wastewater Treatment Plant, which is located southeast of the Santa Barbara Airport. This facility has a current treatment capacity of 9.7 million gallons per day (mgd), a permitted discharge limitation of 7.64 mgd, and current throughput averages of 5.5 mgd. Municipal sanitary wastes are typically treated through a blended secondary treatment process and discharged via an ocean outfall located approximately one mile offshore of Goleta Beach in 95 feet of water. The GWSD also has a program underway to install various stormwater appurtenances in the City of Goleta, including certain new stormwater components to be installed in the Ellwood Mesa area. This project is in coordination with the County Water Agency, as part of the County's Project Clean Water (City of Goleta 2004).

Thresholds of Significance

A significant impact on utilities and service systems would be expected to occur if the project resulted in any of the impacts noted in the above checklist. In addition, under the City's *Environmental Thresholds and Guidelines Manual*, a project that would generate 196 tons of solid waste/year, after receiving a 50 percent credit for source reduction, recycling, and composting, would result in a project specific, significant impact on the City's solid waste stream. Any project generating 40 tons/year, after receiving a 50 percent credit for source reduction, recycling, and composting would be considered to make an adverse contribution to cumulative impacts to the City's solid waste stream.

Project Specific Impacts

a, b, e) Implementation of the proposed Project would be limited to trail improvements and habitat restoration activities. Consequently, the proposed Project would not result in an exceedance of wastewater treatment requirements as use of these systems would not be necessary.

c) Implementation of the proposed Project would not result in an impact to or require the construction of any storm water drainage facilities. Storm water would percolate into the groundwater or be drained via Devereux Creek and its tributaries.

d) No residential water services exist on site or are proposed as a part of the Project. There would be no long-term change to water use under the proposed Project and expanded

water supply entitlements would not be required. Imported water would be used temporarily for soil BMPs and habitat restoration planting. Some areas may benefit from temporary irrigation systems, which can be attached to a small truck with a portable pump. A water storage tank with a 5,000 gallon capacity may be positioned on the south side of Ellwood Eucalyptus Grove at the Santa Barbara Shores road extension to facilitate irrigation system watering from a mobile water source.

f, g) The Project would require disposal of approximately 15 cubic yards of degraded asphalt proposed for removal from Beach Access Point E. The asphalt would be hauled to the granite recycling plant located at 5335 Debbie Lane and disposed of in compliance with all applicable federal, state, and local regulations. Consequently, there would be a less than significant impact associated with solid waste disposal.

Cumulative Impacts

The proposed Project would not contribute to cumulative impacts associated with utilities and service systems.

Required Mitigation Measures

As the implementation of the proposed Project would not result in any potentially significant adverse impacts to utilities and service systems, no mitigation measures are required or recommended for the proposed Project.

Residual Impacts

There would be no residual impacts to utilities and service systems as a result of the proposed Project.

Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a) 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?			×		
b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?			×		
c) 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)?			×		
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			×		

14. PREPARERS OF THE DRAFT MITIGATED NEGATIVE DECLARATION, CONTACTS, AND REFERENCES:

This document was prepared by AMEC Environment & Infrastructure, Inc. under the direction of the City of Goleta Public Works Department and Planning and Environmental Services Department staff.

AMEC

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City of Goleta

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15. SUMMARY OF MITIGATION MEAURES

MM AQ-1 ***PM_{10} Minimization****: Dust generated during short-term trail construction activities associated with the proposed Project must be kept to a minimum consistent with the requirements of the SBCAPCD.*

- *During construction, a water truck (i.e., a light pickup truck with an attached water tank) should be used for water suppression. This vehicle should be kept in a designated staging area. Water spraying must be used regularly to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 miles per hour (mph). Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.*

- *Minimize amount of disturbed area and reduce on site vehicle speeds to 15 mph or less.*

- *If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than two days must be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site must be tarped from the point of origin.*

- *Gravel pads must be installed at all access points to prevent tracking of mud onto public roads.*

- *After clearing, grading, earth moving, or excavation is completed, disturbed must be treated area by watering, or revegetation, or by spreading soil binders until the area is paved or otherwise developed so that dust generation must not occur.*

- *The City must designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. The monitor(s) must also ensure that the watering truck is kept at the proper staging area when not in use. Their duties must include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons must be provided to the SBCAPCD prior to land use clearance for project grading.*

- *Prior to land use clearance, the applicant must include these dust control requirements as a note on a separate informational sheet to be recorded with a map. All requirements must also be shown on grading plans.*

MM AQ-2 ***Equipment Exhaust Minimization****: As required by APCD for all construction projects, the following regulatory requirements and control strategies, required by state law, must be adhered to throughout grading, hauling, and trail construction activities:*

- *Diesel-powered construction equipment must be registered with the state's portable equipment registration program or have an APCD permit.*

- *Mobile construction equipment is subject to the CARB Regulation for In-use Off-Road Diesel Vehicles (Title 13 California Code of Regulations [CCR], Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter and criteria pollutant emissions from in use off-road diesel-fueled vehicles.*

- *Commercial diesel vehicles are subject to Title 13 CCR § 2485, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading must be limited to five minutes; electric auxiliary power units should be used whenever possible.*

MM AQ-3 ***Reduction of Diesel Exhaust Pollutants****: The following recommended control strategies should be implemented to the maximum extent feasible in order to minimize diesel exhaust per SBCAPCD requirements:*

- *Diesel construction equipment meeting the CARB Tier 1 emission standards for off-road heavy-duty diesel engines must be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.*

- *Diesel-powered equipment should be replaced by electric equipment whenever feasible.*

- *If feasible, diesel construction equipment should be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by USEPA or California.*

- *Catalytic converters should be installed on gasoline-powered equipment, if feasible.*

- *All construction equipment should be maintained in tune per the manufacturer's specifications.*

- *The engine size of construction equipment should be the minimum practical size.*

- *The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.*

- *Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.*

MM BIO-1 ***Sensitive Species Survey****: An Applicant-funded special status species survey must be conducted by a City-approved biologist immediately prior to construction. Depending on the timing of trail construction activities, the survey must include the following components:*

- *If trail-construction activities on the shared Coastal-Anza Trail or the trail segments along the eastern and western eucalyptus windrows would occur within the raptor breeding season (January 1 through September 15), a raptor survey must be conducted in these areas to establish the current breeding status of resident raptors adjacent to the relevant trail segments. This survey component must include recommendations regarding minimizing impacts during construction per GP/CLUP Policy CE 8.2, including setbacks and restrictions on construction scheduling. If nests are documented, construction work within a 300-foot radius of active nest(s) must be suspended until the young have fledged the nest per GP/CLUP Policy CE 8.4.*

- *If trail-construction activities within 100 feet of the edge of the eucalyptus groves that host known monarch butterfly aggregation sites would occur during the overwintering season for monarch butterflies (October 1 through March 31), a City-approved biologist must survey all eucalyptus trees within a 100-foot distance of the relevant trail and habitat restoration areas (i.e., along the shared Coastal-Anza Trail and the western extent of the Coastal Loop Trail) to determine use by monarchs per GP/CLUP Policy CE 4.5. If butterfly aggregations are found within 100 feet of the work area, trail-construction must be halted until a City-approved biologist has determined monarchs have left the site.*

- *If trail-construction activities would occur within the blooming period for southern tarplant (June 1 through September 30), a pre-construction survey must be conducted for southern tarplant. Recommendations must be made to reroute the trail around recorded individuals, limiting disturbance to the maximum extent feasible. If disturbance cannot be avoided, then potentially affected individuals would be relocated and/or additional southern tarplant individuals would be planted as a part of mitigation associated with the proposed Project.*

- *Prior to the commencement of any construction-related activities at the toe of beach access points (i.e., the interface of the bluff face and beach habitats), visual surveys for globose dune beetle and sandy beach tiger beetle must be conducted. If either of these sensitive species is observed within the footprint of the proposed trail recontouring or habitat restoration footprint individuals must be captured and relocated to adjacent suitable habitat.*

MM BIO-2 ***Native Plant Requirements****: In order to protect the genetic integrity of the native plant populations on the undeveloped portions of the subject property, the Final Restoration Plan must explicitly prohibit the use of non-locally collected native plants and seed materials restoration within or adjacent to open space areas. All seed or plant material must come from sources within the Devereux Creek watershed per GP/CLUP Policy OS 5.4(d). The Final Restoration Plan for the proposed Project must prohibit buried irrigation infrastructure; all temporary irrigation components must be placed above ground in open space areas. The potential for damage to the pipe by vandalism or exposure is considered insufficient to offset the environmental damage caused by trenching to install pipes and structures and subsequent digging to remove pipes and structures. Pipes must be inspected monthly for leaks and all leaks must be repaired promptly to avoid erosion, weed establishment, or other environmental damage.*

MM CR-1 ***Cultural Resource Monitoring Plan****: In the unlikely event that historical, archaeological, or paleontological resources are encountered during grading, work must be stopped immediately or redirected until a qualified Registered Professional Archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigation standards set forth in the City Archaeological Guidelines. If remains are found to be significant, they must be subject to a Phase 3 mitigation program consistent with City Archaeological Guidelines and funded by the Applicant.*

MM CR-2 ***Handling of Human Remains****: In the event human remains are encountered during grading, work must be stopped immediately and the remains must be treated in accordance with Health and Safety Code Section 7050.5 and CEQA Guidelines (Title 14 CCR Division 6, Chapter 3) Section 15064.5(e).*

MM GEO-1 ***Design and Grading Standards****: Final grading and trail construction plans submitted to the City of Goleta for review and approval must be consistent with applicable established CBC and City of Goleta Grading Ordinance standards per City of Goleta Municipal Code § 15.09. The plans must include the location of the More Ranch Fault system and demonstrate that all structures are designed in compliance with earthquake standards for CBC Seismic Zone 4.*

MM GEO-2 ***Blufftop Erosion Monitoring****: The City shall monitor natural seacliff erosion and retreat shall be monitored every ten years and after every El Niño winter. The City must manage the relocation of the Coastal Trail if unsafe conditions exist along the bluffs as the result of landslides, erosion, and cliff retreat.*

MM GEO-3 ***Best Management Practices (BMPs)****: Implementation of the proposed Project must include the following*:

- *Other than what has been described for installation of the boardwalk and other improvement activities, grading must be prohibited within 50 feet of the Devereux Creek top-of-bank.*

- *The Applicant must limit excavation and grading to the dry season (April 15 to November 1) unless a Building and Safety-approved erosion control plan is in place and all measures therein are in effect.*

- *BMPs must be employed to control erosion, including temporary siltation protection devices such as silt fencing, straw bales, and sand bags. These must be placed at the base of all cut and fill slopes and soil stockpile areas where potential erosion may occur. The final grading plan must include erosion control measures including types and locations of BMPs. The plan must be approved by the City of Goleta prior to the commencement of grading operations.*

- *The City must periodically inspect the drainage crossings and beach access points during the wet season to ensure structural integrity and avoidance of flood hazards or scouring. Maintenance and repairs must be performed as needed.*

MM HAZ-1 ***Hazard Identification****: Prior to the issuance of either a grading or land use permit, the Applicant must coordinate with the SBCFD FPD and PHD-EHS to*

ensure that emergency access and hazards or hazardous materials concerns of FPD and PHD-EHS are addressed.

MM HAZ-2 ***Heavy Equipment Operation****: Heavy equipment must not be operated in open space areas on days when red flag warnings are issued by the SBCFD unless FPD provides an exception given inclusion of construction-related fire suppression measures during trail improvement. Additionally, all equipment used on site must be properly maintained such that no leaks of oil, fuel, or residues take place. Provisions must be in place to remediate any accidental spills. All equipment must only be stored in the appropriate equipment staging areas and construction vehicles must be confined to a pre-defined equipment access path no greater than the minimum width necessary to complete necessary construction activities.*

MM WAT-1 ***Storm Water Permit***: *The Applicant must submit documentation of a National Pollutant Discharge Elimination System (NPDES) Storm Water Permit from the* California Regional Water Quality Control Board (RWQCB) *or must submit documentation of an exemption from permit requirements.*

MM WAT-2 ***Notice of Intent****: Prior to the initiation of construction or site-preparation activities, the Applicant must file a NOI to the RWQCB pursuant to 40 Code of Federal Regulations (CFR) 122 and Goleta Municipal Code § 15.09.100.*

MM WAT-3 ***Storm Water Pollution Prevention Plan****: The Applicant must prepare a SWPPP in accordance with the guidelines adopted by the State Water Resources Control Board (SWRCB) covering all phases of grading and construction activities and including all requirements of the City's erosion and sediment control plan per Goleta Municipal Code § 15.09.290. The SWPPP must be prepared and submitted, along with final with grading and trail construction plans, to the City prior to the issuance of grading permits.*

MM WAT-4 ***Notice of Termination****: The Applicant must file a notice of termination of construction with the RWQCB implementing a SWPPP closure and identifying how pollution sources were controlled during trail construction activities.*

MM NOI-1 ***Construction Timing****: The operation or maintenance of heavy construction equipment within 500 feet of residential developments must be limited to the maximum extent feasible. Additionally, the operation or maintenance of heavy construction equipment must not occur in this area on State holidays (e.g., Thanksgiving, Labor Day).*

MM NOI-2 ***Construction Equipment****: Stationary construction equipment used on the northern segments of the shared Coastal-Anza Trail that would generate noise in excess of 65 dBA at the Project boundaries must be shielded and located as far towards the interior of the construction site as practical to minimize the noise levels at the Comstock Homes Development (The Bluffs) and the golf course to the west.*

MM NOI-3 ***Best Management Practices (BMPs)****: The following measures must be incorporated into final grading and trail construction plans to reduce the impact of construction noise per GP/CLUP Policy NE 6.5:*

- *The Applicant must ensure that construction equipment is properly muffled according to manufacturer's specifications or as required by the City, whichever is more stringent.*

- *The Applicant must place noise-generating construction equipment and locate construction staging areas away from noise-sensitive activities, where feasible, to the satisfaction of City staff.*

- *The Applicant must implement noise attenuation measures which may include, but are not limited to, changing the location of stationary construction equipment, shutting off idling equipment, and installing acoustic barriers around significant sources of stationary construction noise.*

MM REC-1 ***Construction-related Temporary Trail Closure Plan****: The Applicant must prepare a construction-related temporary trail closure plan, which must outline construction timing and the duration of necessary construction-related temporary trail closures. Temporary trail closures must be limited to the maximum extent feasible during trail construction and habitat restoration activities. Areas that necessitate temporary closure for trail recontouring must be roped off to protect public safety in these areas. During construction of the shared Coastal-Anza Trail realignment, safe access to Ellwood Mesa must be provided via another route. Similarly, beach access point improvements must not be constructed simultaneously; at least one access point must remain open at all times.*

MM TT-1 ***Traffic and Pedestrian Management Plan****: The Applicant must prepare a Traffic and Pedestrian Management Plan that must include, but not be limited to, designated construction worker vehicle parking and access routes, maintenance of clear trail routes (e.g., with signage) on Ellwood Mesa during construction activities, maintenance of at least one beach access point route at all times during construction, nightly removal of equipment to a designated area. The City must also provide the public with contact information in order to report immediate hazards related to the Project. This information must be provided in a public notice posted prominently on-site prior to the commencement of any Project-related activities.*

MM TT-2 ***Construction Schedule****: The Applicant must provide Ellwood Elementary School with a construction activity schedule and construction routes as well as the name and telephone number of a contact person responsible for the construction schedule no less than 14 days in advance of commencement of construction activities. Any alterations or additions must require a minimum seven day notification.*

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Attachment 1

Habitat Restoration Plan

APPENDIX "A"

HABITAT RESTORATION PLAN

The Ellwood Mesa contains numerous Environmentally Sensitive Habitat Areas (ESHA), in addition to the spectacular vistas valued by users of the trails and beach. In addition to the proposed trail improvements, the project also proposes to restore natural habitats and resources. Ellwood Mesa is one of the largest undeveloped open space areas along the Santa Barbara coast and includes a diverse assemblage of plant and wildlife species. As such, it is a remarkable resource that merits careful protection, habitat restoration, and management. Approximately 13 acres in the trail corridors, between the California Coastal Trail and the bluff, and portions of the bluff face and dunes are proposed for restoration. The restoration plan refers to the Figures found in the main document of the Project Description. The relevant maps for Environmentally Sensitive Habitat Areas (ESHA) and Habitat Restoration Plan Map are found under separate cover.

The Native Grassland, composed largely of purple needlegrass, *Stipa pulcra,* is the largest expanse of native bunchgrass grassland on the south coast. Southern Vernal Pools are scattered throughout the mesa. Southern Coastal Bluff Scrub is a rare habitat type identified in the Natural Community Diversity Database (California Department of Fish and Wildlife).Southern Dune Scrub is present at the base of the eastern bluffs, as are Southern Foredunes. Devereux Creek and the drainages to the north contain Southern Riparian Scrub and Riparian Forest. Monarch Butterfly Habitat is present in the adjacent eucalyptus grove, but is not part of this trail improvement and habitat restoration project.

Although these remarkable natural resource ESHAs are present, many areas are degraded by the presence of invasive plant species such as fennel, mustard, harding grass, cape ivy, and invasive shrubs and trees such as myoporum and olive trees. Some of these species have been spreading in recent decades, compromising the existing native vegetation. Fennel also obscures the ocean view from the Coastal Trail in many areas. This has been a factor in the creation of many of the social trails so that visitors can see the ocean; this further degrades the native vegetation, can be hazardous if the blufftop fails, and exacerbates erosion.

Approximately one-half of the mile-long segment of the Coastal Trail at Ellwood Mesa is located within 100 feet of the bluff-top. Lack of management of the bluff-top portion of the trail has resulted in serious degradation to the trail. This includes gullying, erosion, expansion of the trail width as users route themselves around uneven terrain, thereby damaging surrounding vegetation and sensitive habitats.

Trail entrenchment causes puddling during rain events, as the water cannot easily flow off the trail. Trail users then walk around the puddles, further degrading native habitat adjacent to the trail. Several trails go through vernal pools, disturbing the native vegetation and altering

the hydrology of the pools. The trails going through Devereux Creek and other drainages cause soil compaction and loss of riparian vegetation.

The Ellwood Mesa Coastal Trails and Habitat Restoration Design Project proposes to remedy many of these impacts to the native vegetation and environmentally sensitive habitats at Ellwood Mesa. For example, a section of the De Anza trail is proposed for realignment, as designated in the City of Goleta General Plan, to avoid the vernal pools.

To address trail entrenchment, the project proposes to utilize native soil from the onsite berms that line many of the trail segments, as a result of past trail grading. This soil can bring the trails up to grade, to allow for drainage off the trails and reduce ponding. The resulting at-grade barren areas will be revegetated with native plant species. The area of the donor fill sites identified that may be used as needed for fill totals 78,228 square feet, or approximately 1.8 acres.

Environmentally Sensitive Habitat Areas (ESHAs):

The Ellwood-Devereux Coast Open Space and Habitat Management Plan (OSHMP) Area includes several environmentally sensitive habitat areas (ESHA).[3] ESHAs are protected against any significant disruption of habitat values. Only uses dependent on resources within an ESHA are allowed. Development in areas adjacent to ESHAs and parks and recreation areas must be sited and designed to prevent impacts that would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

The project proposes removal of non-native plant species (such as mustard, fennel, iceplant and Harding grass) along the trail corridors of the Coastal and De Anza trails, the fill areas, and the entire length of the blufftops on the ocean side of the trail to improve the ESHA habitats.

The ESHA map, provided under separate cover, shows the Classifications of Environmentally Sensitive Habitats in the OSHMP Area and Ellwood Mesa. Below are described the habitat types within the proposed project area. For example, Monarch Butterfly Habitat is found in the eucalyptus grove, but is not within the project area of the proposed Coastal Trails and Habitat Restoration design project.

Riparian Habitats:

Riparian habitat occurs along the drainages in the OSHMP Area. Refer to Figure 3 for a map

[3] The CA Coastal Act provides specific protection for "environmentally sensitive areas." These are defined as areas in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem, and which could be easily disturbed or degraded by human activities and developments.

of drainage locations. The major drainage at Ellwood Mesa is Devereux Creek, which traverses the western half of the Open Space Plan Area and Ocean Meadows Golf Course before discharging to Devereux Slough at Venoco Road. The major tributary to Devereux Creek is Phelps Ditch/El Encanto Creek, east of the project area on University property.

Riparian habitats within the Open Space Plan Area include freshwater marsh, riparian scrub, and riparian forest. Freshwater marshes occur along drainages where there is seasonal winter flows and prolonged soil moisture. The project proposes to realign the Coastal-De Anza Trail to conform to the General Plan alignment so that it skirts the Eucalyptus groves south of the parking lot, restore the nearby gully areas impacted by overuse, as well as those areas impacted adjacent to the Devereux Creek crossing. The active channel in the drainage—Gully 2A—will be traversed by a boardwalk with screw pilings, as will the Devereux Creek crossing.

Southern Vernal Pools:

Prior land use has damaged or destroyed vernal pools, including horse grazing in the Ellwood Mesa/Santa Barbara Shores area and historic oil development. The project proposes to enhance the existing vernal pools, realign specific sections of the Coastal Trail and the De Anza trail to avoid identified vernal pools. Two vernal pools will be enhanced, where the De Anza Trail is to be realigned per the General Plan, and a vernal pool on the eastern boundary where the Coastal Trail enters Ellwood Mesa.

Native Grassland:

Ellwood Mesa contains one of the largest stands of native grasslands in Santa Barbara County, composed largely of purple needlegrass, *Stipa pulcra*. The project plan proposes to increase native grasslands at Ellwood Mesa by adding native species along the trail corridors, fill areas and other restoration areas. Where minor trail modifications are made for drainage improvements, for example, some purple needlegrass and grassland associate blue-eyed grass may be disturbed. These plants will be salvaged and replanted in the adjacent trail corridor.

Coastal Sage Scrub:

Coastal sage scrub habitat occurs in various locations of the Open Space Plan Area. Small isolated patches of coastal sage scrub frequently intergrade with native and non-native annual grassland and coyote bush. The project plan proposes to increase coastal sage, primarily in the trail corridor for the planned new Coastal Trail Realignment (Refer to Figure 6) and in the donor fill sites on both sides of the Santa Barbara Shores road extension.

Coastal Bluff and Beach:

Coastal Bluff Scrub, Southern Dune Scrub and Southern Foredunes are habitats found along the entire blufftop, the bluff face and the beach interface. Especially on the east end the bluff face is highly degraded with erosions gullies, extensive non-native iceplant, and a row of myoporum shrubs at the base of the bluff. The project proposes to remove non-native species including eradication of iceplant and myoporum at Ellwood Mesa and revegetate with native

Coastal species south of the Coastal Trail. Erosion gullies on the bluff face in these areas will be revegetated to address bluff erosion; some of these gullies have been used as paths, further exacerbating erosion. Extensive iceplant is present on the eastern bluff face and foredunes.

Western Snowy Plover:

The beach at Ellwood as far west as Access F is designated Critical Habitat by the US Fish and Wildlife Service for the Western Snowy Plover. Plovers roost in breed in sparsely vegetated or unvegetated sand dunes or sandy beach habitat. The foredunes at Ellwood are infested with iceplant and thus currently poor habitat, but are potential habitat with iceplant eradication as proposed by this project.

Existing Conditions

The ESHA map, under separate cover, shows the habitat types and extent of native grasslands and vernal pools in particular, as they exist pre-project. The Devereux-Ellwood Open Space Plan and several Environmental Impact Reports have studied and identified the natural resource values of the Ellwood Mesa.

Proposed Restoration Activities

The habitat types and acreages are not proposed to change with this project with one exception. The project proposes to create a small 0.4-acre Coast Live Oak woodland south of Devereux Creek. There are currently scattered coast live oak trees in the riparian areas, but most are found in the understory of non-native eucalyptus trees. We also propose planting individual and small groups of oaks near the drainages. Historically extensive oak woodlands were reported, likely where the eucalyptus forest is now found.

While the habitat types will largely remain unchanged, major enhancements of the habitat value are proposed in the Restoration Plan, in the trail corridors, the crossings in Devereux Creek and the drainages, where fill material is proposed for removal to improve the trails, between the Coastal Trail and the bluff, and the bluff in areas surrounding the two beach access points. Approximately 13 acres of restoration/ enhancement is proposed as part of this project.

The Habitat Restoration Plan Map shows the proposed restoration areas. The target species of invasive plant removal, and techniques proposed for removal, are listed first, then a narrative of restoration activities that follow the trail improvements as described in the Project Description.

The Habitat Restoration Map identifies areas along the trails where berms of soil, accumulated by grading of trails in the past, will be excavated to grade for fill of entrenched trails. These berms are largely vegetated with non-native grasses, mustard, and fennel. Many adjacent

areas have native cover, such as native grasslands and grassland associates, suggesting that the fill donor sites, absent the fill, will support native vegetation. The Plan identifies the restoration plan for various donor fill sites, largely native grasslands along the Coastal Trail.

The area between the Coastal Trail and the Coastal Loop Trail are proposed for restoration. In many areas non-native fennel obstructs the views of the ocean from the trail. Eradication of the fennel and other non-native plants and revegetation with low-growing coastal plant species native to the Devereux-Ellwood Open Space Plan area will enhance the visitor experience. Where erosion or non-native vegetation is found just over the blufftop, native shrubs and bunchgrass will be planted to help stabilize the bluff face without obstructing views from the blufftop.

The bluff face and beach dunes east of Access F is highly degraded with extensive iceplant and is proposed for eradication of iceplant and revegetation with native coastal bluff scrub, coastal dune scrub and foredune vegetation. The coastal bluff face can be returned to a high ecological value while stabilizing the bluff to reduced erosion.

The trail improvements and associated restoration are likely to be implemented in phases, and Final Restoration Plans will be completed with each phase. The details presented here will allow for environmental review and permitting. A plan for supplemental watering, maintenance and performance standards will be provided.

Restoration Guidelines

All plant species to be installed in this project will be species found in the Devereux-Ellwood Open Space Plan area. The plant propagules—seeds, rhizomes or cuttings—will be collected from the same Open Space area. Some caution is needed in that some past restoration projects have used species or genotypes from outside the area, and collection from those areas or species should be avoided. For example, in what is now Coal Oil Point Reserve, a mitigation revegetation project below the Venoco oil tanks planted bush lupine with yellow flowers rather than our local purple, and tall coast goldenbush is different from the two varieties native to the Open Space area.

In the 1997 a contaminated soil removal project at what is now Ellwood Mesa included restoration plantings in Devereux Creek above and below the current trail crossing. Some wetland plants were salvaged and replanted, however other plants were grown and planted by community volunteers. The plant sources were "local" but some species were collected from outside the Devereux-Ellwood Plan area, which is specified for this project. Reference "2nd Monitoring Report for Santa Barbara Shores County Park Revegetation Project at Devereux Creek", Dougal House, February 1999. Thus caution must be used in collecting from this area for the proposed restoration project.

Revegetation will have spacing varying from 2.2' to 5' on center, for grassland and shrub plantings, respectively. The average plant density is about 4' on center. In most areas except the fill borrow sites, native species are present and infill planting only is planned. Spacing for individual installed plants will meet the recommendations, for areas cleared of invasive, non-native plants. Some of the iceplant areas will require intensive planting as few natives have survived.

Exhibit 1 has conceptual plant species and numbers for the restoration project sites proposed in this project. Container plants will be used for most revegetation, approximately 33,500 plants in total. One gallon shrubs, leach tubes for grasses, coast live oaks from 1-gal tree tubes to 15-gallon where blocking a former trail alignment is desirable. Leach tubes, 7" Super-tubes, will be used for native grass plants, and for some species such as coast goldenbush (prostrate form), coast morning glory and California fuchsia, especially for planting on the bluff face.

In some locations, where noted, seeds will supplement container planting, for these species:

Southern Tarplant	*Centromadia parryi ssp. Australis*	Annual; CNPS-listed
Gum Plant	*Grindelia camporum*	
Bush Lupine	*Lupinus arboreus*	
Coast Goldenbush	*Isocoma menziesii*	Upright & prostrate genotypes
California Sagebrush	*Artemisia californica*	
California Sunflower	*Encelia californica*	
Seacliff Buckwheat	*Eriogonum parviflorum*	

The project proposes to use the technique utilized by the UCSB Cheadle Center for establishing Southern tarplant: collect dried plants at the end of the growing season in a container such as a garbage can, crush the plants, and spread the crushed material which includes the seed in the area where Southern tarplant is desired. The seeds of this annual species are very spiny and thus difficult to collect by hand.

Following the experience of Coal Oil Point Reserve, we plan to use direct seed only for Southern Foredune restoration following iceplant eradication. Species proposed for the beach dune restoration; the seeds would be collected at Coal Oil Point Reserve:

Beach Evening Primrose *Camissonia cheiranthifolia*
Beach Morning-Glory *Calystegia soldanella*
Beach Saltbush *Atriplex leucophyla*
Pink Sand Verbena *Abronia umbellate*
Red Sand Verbena *Abronia maritima*

Sprigs of frankenia will be planted in Devereux Creek, upstream of the boardwalk where weeds are cleared. Arroyo willow cuttings will be used in the spaces between *Arundo* rhizomes, after cutting and herbicide treatment, in Access F.

In a few areas, native vegetation will be removed for the installation of a new trail alignment or widening. Where bunchgrass and grassland associates are removed, these will be salvaged and immediately planted in the adjacent or nearby trail corridor. For purple needlegrass and blue-eyed grass, the most common plants to be disturbed during the trail improvements, similar relocation was nearly 100% successful at Coal Oil Point Reserve during Pond Trail improvements several years ago. The restoration plantings (6650 purple needelgrass) will more than compensate for the minimal impacts to native vegetation.

The installation of boardwalks with screw piling supports is proposed for Devereux Creek and the active channel gully in the main drainage south of the parking lot. Both of these areas are ESHA, and the disturbance to wetland vegetation will require at least 3:1 replacement of impacted vegetation. Direct disturbance—for placement of the screw pilings, and removal of old trail fill from Devereux Creek, as recommended by Natasha Lohmus of California Dept. of Fish and Wildlife—and indirect impact of shading by the boardwalk, will both be mitigated at least 3:1. See specific sections for details.

Non-native vegetation will be removed from the restoration sites prior to planting. Species-specific removal techniques are described below. Maintenance and monitoring of each site, likely installed in phases, will be for three years. The first year will be most intensive, as the weed seed bank in depleted by monthly weeding during the growing season. For the second and third year, at least twice a year weeding of planting areas will be accomplished. Project monitoring for maintenance needs will be done quarterly.

All planting will be done during the winter rainy season November – April, to take advantage of the winter rains for establishment. This is also the preferred time for trail work, when the moist soil can be worked. Planting will commence within 60 days of any soil disturbance, and erosion control blankets, or natural bio-degradable materials will be installed on slopes as needed for bank stabilization. This is more likely in the re-contoured slopes in the inactive drainage channels of the drainage south of the parking lot.

Supplement water is likely to be needed, depending on the rainfall pattern following plant installation for each phase. Most plantings will occur, except on the bluff, on the downslope side of the trail, which will benefit from runoff. Some areas may benefit from temporary irrigation systems, which can be attached to a small truck with a portable pump. A water storage tank, suggested size 5000 gallons, to facilitate hand and irrigation system watering from a mobile water source may be placed in an area of disturbed vegetation on the south side of Ellwood Eucalyptus Grove at the Santa Barbara Shores road extension, which will

maintain vehicle access for City staff and emergency vehicles. This tank can be filled periodically by a water truck. The Cheadle Center has 2 5000-gallon tanks at UCSB South Parcel, filled by Aqua Truck Inc periodically, utilizing a UCSB fire hydrant. The Venoco Ellwood Marine Terminal, slated for dismantling, has a large water tank filled by a hard water line. If UCSB retains this line and tank for restoration, the City could negotiate during the Devereux-Ellwood Open Space management meetings for shared use of this resource for habitat restoration. Supplemental water options such as siting of a tank will be discussed with City staff.

Performance standards. As an enhancement project, establishment of 75% native cover will be criteria of success by the end of three years. While non-native grasses will be removed to aid establishment of the installed native plants, these are common at Ellwood Mesa and will continue to be present. From the planting areas, 100% eradication of Iceplant is planned. Fennel, mustard, thistle, and Russian thistle will be removed from the planting sites during maintenance, but some regrowth from the seedbank is anticipated. Monitoring will be done once a year during and at the end of the maintenance period, using photo-monitoring and estimation of % native cover in grassland, riparian, and bluff scrub habitats. 75% survival of Coast Live Oak and Santa Barbara Honeysuckle will be success. Annual reports will be prepared by December each year, including an as-built description in the year one report (for each phase), for the first 3 years of the project (or each phase).

Invasive Plant Removal

Fennel. *Foeniculum vulgare* is widespread on Ellwood Mesa, and has been expanding over the past 20 years. This invasive, exotic species is proposed for removal between the Coastal Trail and the bluff, where it obstructs views and displaces native blufftop vegetation, and from the trail corridors. A dense fennel patch is proposed for removal south of Devereux Creek, where the trail will be realigned to provide an accessible 5% grade and control erosion.
Several techniques are recommended for control of fennel on the site depending on several factors: fennel density, presence/absence of native vegetation, and adjacent soil disturbance for trail rehabilitation.

In dense patches of fennel, a brush mower or brush cutter can be used to cut the standing dead and live stalks. Volunteers can cut and bag seedheads to reduce entry into the seedbank. Fresh cuts immediately painted (within 5 minutes) with glyphosate 50% or 100% is effective, and has no overspray to native vegetation. Alternatively, fennel can be allowed to regrow and bushy growth 1-2 ft in height can be sprayed with glyphosate and surfactant; RoundUp in upland areas, or with Agridex near wetland areas.

Large clumps can be dug out when a small excavator or other equipment is being used to re-contour the trail and fennel is in the disturbance area. Small fennel can be dug out with a

sharpshooter shovel when the soil is moist. This is a good volunteer project and protective of adjacent natives, such as the extensive Blue-eyed grass south of Devereux Creek.

Mustard. Most of the mustard on Ellwood Mesa is the annual black mustard, *Brassica nigra*. Mustards reportedly produce allelopathic chemicals that can inhibit germination of native plants. Hand pulling mustard is effective. Mowing or weedwhacking plants when flowering and in seed, but before seeds are inflated, can reduce the competition. Without viable seed, the plants can be left on the ground as mulch and may reduce germination of the mustard seedbank. Where there is a monoculture of mustard, tarping of young plants can kill the seedlings in a few weeks. This is suggested as a "grow-and-kill" treatment prior to planting, especially in creation of the new connector trail to Access F, which traverses a dense mustard stand.

Harding grass. *Phalaris aquatica* is a rhizomatous perennial best controlled with herbicides. Cultivation is not effective, as pieces of rhizomes spread the plant as well as the seedbank. Glyphosate and grass-specific herbicides such as Fusilade, which can be used around native shrubs, are effective, but follow-up treatment is required. Mowing the grass and treating the actively growing grass is more successful. Dense stands of harding grass interfere with raptor foraging on the mesa. Raptors including the White-tailed kite are visual predators, so that in native bunchgrass stands there are usually bare areas, raptors can see their rodent prey, but the rodents can safely hide in dense stands of harding grass.

Cape Ivy. Hand removal of cape ivy, *Delairea odorata,* is proposed; this is a good volunteer project with professional supervision. Follow-up is always needed, as some rhizomes break in the soil and some regrowth is common. While cape ivy is wide-spread in the eucalyptus groves, and control is proposed but not part of this project, only one significant infestation occurs in the project area: a mesic site with native trees and shrubs immediately north of the trail at Access E. A small infestation was observed along the Coastal Alternative Trail north of the creek. Removal of these infestations will protect the mesa from further infestation, as seeds are wind-dispersed, and the vines can overtop and kill native trees and shrubs.

Iceplant. Integrated pest management is proposed for iceplant; the most common species at Ellwood Mesa is *Carpobrotus edulis.* Black plastic tarping is preferred where feasible, such as relatively flat, sunny areas without significant native plants. Two months of warm weather required to kill iceplant. Hand pulling is proposed in shaded areas as under the Eucalyptus canopy of Access E and around native shrubs. On the bluff, herbicide treatment is often the best environmental choice, so as not to destabilize the bluff. Square feet of iceplant recommended for removal as part of this project: 173,392 square feet, or almost four acres. On the beach dunes, tarping after September 30--when the Western Snowy Plover breeding season officially ends—may be feasible, otherwise herbicide treatment is necessary, outside of the March 1-September 30 window. Contractors will be utilized for treatment of Iceplant on

the bluff face and herbicide treatment. Volunteer groups can implement tarping and manual removal.

Arundo donax. There is one stand of giant reed, *Arundo donax,* in the Access F canyon, approximately 1000 square feet. This is best treated with cut-stump treatment with 50% or 100% glyphosate applied within 5 minutes of cutting. Bundling the stems and raising the bundles up the bluff is likely to minimize the disturbance to surrounding native vegetation.

Pampas Grass. *Cortaderia selloana* is proposed for eradication at Access E; there are approximately 14 plants (individuals hard to count in groups). Where equipment can access plants, they will be removed entirely. Where inaccessible to equipment, herbicide treatment will kill the pampas grass plants, and after death, the dry leaves will be cut and disposed of off site.

Myoporum, Tamarisk, Olive trees. Several myoporum, one medium-sized olive tree and one tamarisk are found along the Coastal Alternative Trail near the bluff and the golf course. These, as outliers to others on the Ellwood Mesa, are proposed for cut-stump treatment with glyphosate or Garlon as recommended by a Registered Herbicide Applicator. Material may be cut fine as in "lop-and-drop" where removal is a disturbance, or hauled to a site for chipping, especially if coordinated with other tree trimming activities at the City park property. Several Myoporum are found in the Eucalyptus on the eastern boundary and are proposed for removal. Scattered olive trees, all young or stunted are found on the Mesa, and those in the vicinity of the Coastal and De Anza Trails are proposed for removal, also by cut-stump treatment.

Cypress tree. One Monterey cypress tree, *Cypressus macrocarpa,* in the Access F canyon is recommended for drill-and-fill treatment to kill it in place, as removal of the dead material would disturb surrounding native vegetation. Other cypress trees, including one in the tree/shrubland near Access E, will remain. Although not native to this part of California, White-tailed kites roost in the tree, and Cypress trees near the Eucalyptus grove can be utilized by Monarch butterflies, according to Dr. Daniel Meade (personal communication).

Other annual weeds. Other annual weeds, such as Italian and Russian thistle, annual non-native grasses, will be removed by hand, or can be cut with a mower or weed-eater for site preparation or large expanses where native vegetation will not be disturbed. Debris from weed removal will be disposed of off-site where viable weed seeds are present. Other weeds will be used as mulch around plantings, for a natural look.

RESTORATION PROJECT PROPOSALS

COMPONENT 1:

SPERLING PARKING LOT TO GULLY CROSSINGS

Segment 1 (Refer to Figure 3). The initial trail segment will be re-contoured for runoff to the east and narrowed to 10' and planted with low growing plants tolerant of the partial shade and allelopathic chemicals of the adjacent Eucalyptus trees. About 1500 square feet will be planted with Purple Needlegrass and grassland associates, with scattered *Hazardia* and coast morning glory, 150 plants.

Segments 2-3 (Refer to Figure 3). A new trail heads southwest to cross gullies and aligns with the General Plan. Most of the trail will traverse non-native grasses; the few native grasses will be relocated in the trail corridor. The trail bed will be cut for 5% grade approaching and leaving Gully 1. The 45° banks will be vegetated with about 400 grasses and blue-eyed grass. An existing clump of blue-eyed grass about 25 ft^2 will be disturbed, and all will be replanted on the cut slopes of the new trail. After installation of the culvert and fill, moisture-loving plants sanicle, verbena and alkali ryegrass will be planted in the gully.

Segments 4-5 (Figure 3, 3A). Drainage with gullies. Gully 2A is an active channel with native wetland C*arex* in the invert. To protect the ESHA, minimizing disturbance, a boardwalk will be installed with screw pilings, approximately 8' x 25'. The wetland plants directly disturbed will be relocated east of the eucalyptus trees in the active channel. This revegetation area will be ~2000 ft^2, significantly larger than 3:1 compensation for direct and indirect (shading) from the boardwalk. A brush fascine will be constructed on the downstream side of the planting area, to retain water and limit erosion in this planting area, which will scarified to uncompact soil from the current trail for plant establishment of 400 plants. Plant palette will include Alkali ryegrass and relocated *Carex*. Mulefat will be planted downstream of the brush fascine for stabilization; this species provides nectar for overwintering Monarch butterflies. One Eucalyptus trunk which is horizontal on the ground will be cut and relocated in the current trail tread to aid rerouting the trail. No trees will be removed, but some limbing up will done, outside of raptor breeding season (before February).

The inactive gullies will have fill, provided by re-contouring the slopes of the gully to facilitate planting. Erosion control blankets, natural fibers only, will be installed on these re-contoured slopes as needed before planting. Giant Ryegrass, Coast Morning Glory, California Sagebrush and California Brome will dominate the planting palette of these slopes. The total plantings will 1500 plants, including coast live oak trees north and south where the trail is closed for rerouting. The new trail will be lowered as at Gully 1, and a patch of blue-eyed grass a maximum size of 100 ft^2 will be salvaged and planted on the trail corridor slopes.

COMPONENT 2:

DEVEREUX CREEK CROSSING

Segment 1 (Refer to Figure 4). The trail between the drainage and the creek will be relocated to reduce grade with limbing of a horizontal limb of a eucalyptus tree. Less than 400 ft^2 will be revegetated with oaks and understory species, 50 plants total.

Segment 2 (Refer to Figure 4). The Devereux Creek crossing will have a boardwalk with screw pilings, to protect the ESHA. Direct impact—installation of screw pilings, and removal of old fill from the current trail—and indirect impact--from shading from the 8' x 60' boardwalk--will total approximately 700 ft^2. The total boardwalk and restoration totals 8,428 ft^2 with an area 4000 ft^2 in the creek invert upstream enhanced by weed removal, *Frankenia* sprigging, relocation of salvaged plants and container planting. Mulefat plants will be installed along the toe of the creekbanks, which is a good Monarch butterfly nectar source. Invasive control in the creek invert, with some infill planting of 300 plants, will mitigate disturbance to the wetland plants.

Segment 3 (Refer to Figure 4). Trail re-route: The area where the switchbacks will be created to reduce the grade and control erosion is dominated by non-native fennel. Existing coast live oak, coyote bush and giant ryegrass can be preserved with some trimming and minimal removal. After control of the invasive fennel, the 17,185 ft^2 area will have an oak woodland established, along with understory species for erosion control and habitat diversity utilizing 20 oaks and a total of 800 plants.

COMPONENT 3:

COASTAL LOOP TRAIL

Segments 1-2 (Refer to Figure 5). The Coastal Loop Trail heads west on the northern edge of Devereux creek and crosses the creek near the western boundary of Ellwood Mesa. Invasive weed control, especially around existing native vegetation, is the only restoration planned for this section. This involves mostly hand removal of mustard, thistles and non-native grasses, and treatment some fennel. One planted, non-native oak is proposed for removal from the creekbed. In the creek, just east of the trail crossing, the largest known patch of Santa Barbara Honeysuckle at Ellwood Mesa and a likely source of seeds for nursery-grown plants.

Segment 3 (Refer to Figure 5). This segment of loop trail parallels the Sandpiper Golf Course Fence, and is proposed for three areas of invasive plant removal, all outliers. A small patch of cape ivy will be removed by hand. Harding grass covers about 300 ft^2, and will require

herbicide treatment for eradication. In a coyote brush shrubland toward the bluff east of the trail, cut-stump treatment for 2 Myoporum shrubs and 1 small olive tree is proposed. These eradications will protect the western part of Ellwood Mesa from infestation.

Segment 4 (Refer to Figure 5). The western bluff trail has two areas of the bluff proposed for infill restoration, totaling 24,737 ft^2 area. On the western edge there are several non-native shrubs, 4 myoporum and one tamarisk, and one 15-foot cypress tree proposed for removal by cut-stump treatment. Between the trail and the bluff are two large patches of fennel totaling 2850 ft^2, proposed for removal with herbicides, and planted with natives along with gaps in the native blufftop vegetation. Scattered fennel north of the trail in the trail corridor will also be treated. Non-natives to be removed include Australian saltbush, mustard and vetch. Infill planting will total 600 container plants, with expansion of purple needlegrass and grassland associates where present, and sub-shrubs where dense mustard and fennel are present.

Segment 5 (Refer to Figure 5). Blufftop restoration totaling 22,812 ft^2 and three fill donor sites totaling 13,584 ft^2 north of the trail are located in Segment 5. The westernmost fill site has a patch of purple needlegrass 8'x15', which will be left in place or plants salvaged and replanted after the fill is removed. The rest of the fill donor sites consist of non-native vegetation; the sites will be revegetated at 2.2' oc with 2000 plants of purple needlegrass, blue-eyed grass, coastal poppies, the prostrate form of coast goldenbush, and some yard rush, found in the vicinity.

The narrow bluff will be cleared of a patch of Harding grass (herbicide), some mustard and Australian saltbush. Dense non-native grasses will be cleared only for infill planting sites to maintain bluff integrity. One area near the old fence has some head cutting into the trail and a drainage with mesic native vegetation, and 3 myoporum which will be removed with cut-stump technique. Existing natives include Pacific sanicle, foothill melic grass, bee plant under California sagebrush. Working with the trail crew, the erosion gully will be addressed and 1-2 brush fascines installed in the gully. Large native shrubs such as lemonadeberry will replace the myoporum, existing natives will be protected and expanded. Plantings on the bluff will number 700 infill plants.

COMPONENT 4:

COASTAL-DE ANZA CONNECTOR TRAILS

Segment 1 (Refer to Figure 6). This trail segment will be reconfigured slightly for drainage improvements. No restoration plantings are planned on this section of trail, although any disturbed native plants such as blue-eyed grass will be salvaged and relocated in the trail corridor. Native plants in the corridor will be weeded to foster expansion.

Segment 2 (Refer to Figure 6). A new Coastal Trail Alignment is planned, according to the General Plan trail plan, to protect vernal pools along existing trails. This trail corridor is proposed as 60-feet in width, as it is very weedy, to the north just annual grasses, then perennial invasive harding grass, then robust non-native mustard. Herbicide treatment of the Harding grass is planned, and several mowing sessions or tarping of the mustard to reduce the seedbank. Given the weed seedbank and the weed species, shrubs and subshrubs are planned, with low-growing plants immediately adjacent to the trail. At the outer margins of the corridor, seeds of the upright coast goldenbush will be direct seeded, anticipating that this will spread into the adjacent disturbed habitat. The total restoration area is 49,000 ft^2, and 2700 container plants are planned. The planting palette will include California sunflower, California sagebrush, sawtooth goldenbush and coast morning glory. At the trail border, California fuchsia, coastal poppy and California brome are planned.

COMPONENT 5:

JUAN BAUTISTA DE ANZA TRAIL

Olive trees are invasive and expanding on Ellwood Mesa, and the project proposes that the twelve 8-12 ft. trees in the vicinity of the De Anza Trail be removed as part of this project. Cut-stump treatment with Garlon, and removal of the brush for chipping is recommended.

Segment 1 (Refer to Figure 7). The existing double-track trail is to be narrowed and brought up to grade at 6 feet width, using fill material from 7 areas along this trail west of the Santa Barbara Shores extension road. The fill areas, north and south of the trail, total 17,782 ft^2. Fennel patches will be treated, protecting the interspersed blue-eyed grass. Three thousand plants will be installed to narrow the trail and revegetate the fill donor sites with native species, predominantly Purple Needlegrass and grassland associates.

Segment 2 (Refer to Figure 7). This General Plan Trail realignment will avoid and protect a large vernal pool which the current trail traverses, as well as dense native grasslands. The realigned trail winds through native shrubs to the south with limited impact to the native vegetation for a length of 1230 feet. Any purple needlegrass and blue-eyed grass that is disturbed will be salvaged and replanted in the trail corridor or in the existing footpath. Some trimming of native coyote bush will be required.

The existing footpath will be restored with native species to reduce human disturbance to protect the vernal pools and native bunchgrass in the area. The footpath will be scarified to uncompact the soil. In the vernal pool scarification will be by hand only—such as with a shovel, between the vegetation. Coyote thistle is densest within the existing footpath. Shrubs will be planted at the trail junctions—5 areas in all—to discourage ingress. Each planting area will be approximately 25' and the trail width of 8', so 200 ft^2; 25 plants will be installed to restore

each trail tread. In the vernal pool buffer direct seeding of annual wetland plants will occur: gum plant and the sensitive southern tarweed, the latter by raking in crushed dried plants collected at the end of the season. On the surfaces between the planted trail junctions the upright coast goldenbush seed will be direct-seeded. Shrubs at the trail junctions will be California sagebrush, Santa Barbara honeysuckle, coast goldenbush—upright--and purple needlegrass; about 125 container plants.

Segment 3 (Refer to Figure 7). This single track trail is to be widened from 2 feet to 6 feet. Most of the dense native bunchgrasses and shrubs are on the north side of the existing trail tread. Recommend trail expansion to the south—one exception where a patch of purple needlegrass is to the south. All purple needlegrass and blue-eyed grass to be disturbed shall be salvaged and relocated on the south side of the trail corridor, to create a denser grassland border.

Segment 4 (Refer to Figure 7). The east boundary roadway is 900 feet from the east-west De Anza Trail at Ellwood and the east-west trail connection to UCSB property. The average width is 11.7 feet; the project proposed to narrow this restore to 8 feet and improve drainage off the trail. The restoration is approximately 3000 ft^2, primarily on the east side of the trail, occasionally to the west where the trail drains to the west. Removal is proposed of 3 Myoporum shrubs and one olive tree from eucalyptus understory. Plantings will be primarily grasses—western ryegrass in the understory and purple needlegrass on the western trail margin with occasional shrubs to delineate trail—such as sawtooth goldenbush and Santa Barbara honeysuckle. Five hundred container plants are planned.

Segment 5 (Refer to Figure 7). The connector trail connector between De Anza Trail and Coastal Trail is approximately 360 feet in length. The project proposes to narrow the trail to 8 feet from the current 12-14 feet width. Three hundred container plants are proposed for the restoration area for narrowing the trail, approximately 1600 ft^2 .

COMPONENT 6:

COASTAL BLUFFTOP TRAIL

The eastern blufftop bluff face and dunes totals almost six (5.88) acres. Intensive restoration is proposed for this area. Coastal Bluff Scrub is a sensitive habitat and this area is degraded by extensive iceplant and erosion gullies. The total iceplant east of Access E is approximately 108,153 square feet (almost 2-5 acres) The blufftop has a Southern Vernal Pool at the eastern boundary of Ellwood Mesa, and a mosaic of native and non-native vegetation on the blufftop south of the Coastal Trail.

Vernal Pool (Refer to Figure 8). A *vernal pool of 9409* ft^2 is located on the eastern boundary where the Coastal Trail enters from the University property. The Habitat Restoration map shows the Coastal Trail as it comes from University property to be in the vernal pool. This is not consistent with the vegetation observed in April 2013 (a dry year), although the trail is in the buffer. However, a trail that heads south from the Coastal Trail to the bluff does bisect the vernal pool, with the wetland species common spikerush and meadow barley observed west of the trail. If the City would like to realign the Coastal Trail and perhaps the informal trail to avoid the vernal pool and expand the buffers, a current Wetland Delineation is suggested. Even if the trail alignment is to remain in its current location, the vernal pool can be enhanced with these measures:

a) Remove 2 myoporum trees south of the vernal pool, at the edge of the eucalyptus trees.
b) Hand-weed around the existing coyote thistle, and weed-whack and rake the non-native grasses to reduce their density in the pool. Recommended twice a year for several years, when grasses are first flowering, and again when regrowth is flowering (personal communication *Johanna Kisner, URS*).
c) Rake duff from the center of the best vernal pools at Ellwood Mesa during the dry season and spread the duff in this pool to expand species diversity.
d) Plant meadow barley and common spikerush in the vernal pool.
e) Plant natives in the buffer: verbena, gum plant, purple needlegrass and the prostrate form of coast goldenbush. Direct seed Southern tarweed as previously described.

A total of 725 container plants plus seed are proposed.

Segment 1 (Refer to Figure 8). The eastern Coastal Trail has an area of 99,461 ft^2 between the Coastal Trail and the blufftop (area includes the vernal pool) which is amosaic of native bunchgrass, scattered native shrubs, fennel and mustard, and non-native grasses, with a well-defined social trail near to the blufftop. Restoration is proposed as a mosaic, with removal of the fennel and mustard, and removal of non-native grasses only in clusters where natives are existing or are to be planted. 2000 container plants will be used for infill between existing native vegetation, which will be weeded. Purple needlegrass and grassland associates will predominate the plant palette, with scattered bush lupine and sub-shrubs such as cliff aster.

Eastern Bluff Face & Beach Dunes. Coastal Bluff Scrub and Southern Dune Scrub are sensitive habitat designations, and the bluff and beach dunes east of Access E are dominated by iceplant, with erosion gullies, some of which have been used as footpaths, exacerbating the bluff-face erosion. The low dunes on the beach are vegetated by invasive iceplant, and the bluff face has a mosaic of native shrubs and iceplant. The total area is 137,201 ft^2. Eradication of iceplant and planting and natural expansion of the native vegetation will be a major enhancement of the area. The beach is Critical Habitat for the Western Snowy Plover, but areas infested with iceplant are not suitable roosting or breeding habitat for plovers. This

iceplant will need to be sprayed with herbicide or covered with black plastic tarping after September 30 when the plover breeding season ends—perhaps not enough warm weather to kill the iceplant (generally 8 weeks required). Direct seeding is best for establishment of dune vegetation—seed to be collected at adjacent Coal Oil Point Reserve: beach evening primrose, beach morning glory, beach saltbush, and pink and red sand verbena.

Coal Oil Point Reserve staff have expressed an interest in assisting with the bluff face/ dune restoration to complement COPR dune restoration to benefit the Western Snowy Plover (personal communication, Dr. Cristina Sandoval).

Near the base of the bluff there is a row of large myoporum trees, which are a major infestation in coastal habitats. The project proposes removal of approximately 15 trees by cut-stump treatment. Access D on University property may be more accessible to brush removal than Access E. Quail bush and Lemonadeberry would be good replacement species. On the bluff face, herbicide treatment will minimize soil disturbance for eradication of Iceplant. Several erosion gullies occasionally used as social trails contribute to bluff erosion and should be restored with native plantings. This is contractor work due to steepness, and small container plants, grown in leach tubes, will be more easily installed on the bluff face, except for the large shrubs such as quail bush and lemonadeberry. A total of 2600 plants will be used to infill the areas now bare and where Iceplant will be eradicated. Dudleya and deerweed will be included in the plant palette.

High berms north of the Coastal Trail are dominated by invasive grasses and mustard with two patches of Iceplant. The fill donor site along the northern edge of the trail totals 10,493 ft^2 (inclusive of iceplant) and borders a large expanse of native bunchgrass, which will be expanded. Two thousand plants will be used in revegetation of the fill donor sites.

Segment 2 (Refer to Figure 8). Coastal Trail between beach access points. The area between the trail and the bluff has three areas proposed for restoration, totaling 17,341 ft^2. A portion is currently infested with iceplant. Infill planting with 1500 low-growing sub-shrubs and bunchgrasses is planned. Quailbush and lemonadeberry will be planted in barren areas just over the blufftop, to stabilize the bluff. On the north side, berms from four areas totaling 13,798 ft^2will be removed for fill, and densely revegetated with low shrubs and purple needlegrass, 1500 container plants.

COMPONENT 7:

BEACH ACCESS POINTS

Beach Access E (Refer to Figure 9). The extensive Eucalyptus trees will need to be limbed up in order to remove the blacktop from the old road to the beach; this will reduce erosion and also

facilitate understory restoration with species tolerant of eucalyptus, such as western ryegrass and cliff aster. No trees are proposed for removal in this project area. The Palm trees on the bluff terrace and the Australian Tea Trees (shrubs) at the western top of the bluff will be retained. Extensive iceplant is also present in the 128,793 ft^2 area, and over an acre of iceplant will be eradicated (approximately 47,826 ft^2. All techniques for iceplant eradication will be utilized in this project area. All Pampas Grass will also be eradicated. Planting of 4500 container plants will be supplemented by direct seed in the relatively flat area in the central bowl where iceplant will be eradicated; species to be seeded will include: Coast goldenbush—prostrate, bush lupine, California sagebrush, seacliff buckwheat. The bluff and former fire pit area will be planted with species such as quailbush, lemonadeberry, California fuchsia, bush lupine, purple needlegrass and the prostrate form of coast goldenbush. wooly sea-blite will be expanded at the base of the bluff.

Enhancement habitats north of Beach Access E. A mesic area with elderberry, coyote bush and understory species is infested with cape ivy. The cypress tree will be retained, as it is utilized as a perch by White-tailed Kites. Manual removal of the cape ivy and minor annual weeds is the restoration actions proposed for this 9,086 ft^2 area. Extensive understory natives are present and are expected to expand into the cleared areas. Adjacent is a patch of iceplant, 3,526 ft^2 which will be tarped with black plastic to eradicate the iceplant. As it is surrounded by native shrubs, once the iceplant is dead the area will be direct-seeded shrub species such as California sagebrush, California sunflower and southern tarplant.

The trail junction site north of Access E is currently dominated by iceplant, which will be eradicated with tarping; the area is 2,659 ft^2. Plantings will be low shrubs and coastal morning glory for a total of 450 container plants.

Beach Access F (Refer to Figure 10). The beach access in the central portion of Ellwood Bluff is proposed steps to improve access and safety in reaching the beach from the mesa. The restoration area is 28,811 ft^2, with major iceplant eradication and planting of native species. The iconic yucca on the bluff will remain. Iceplant on level ground can be killed with black plastic tarping. Under shrubs, in the shade, manual removal is proposed. On the steep bluff faces, herbicide treatment is the environmentally preferred option to maintain bluff stability. Native plants will be planted in disturbed areas along the stairway, and where iceplant is eradicated; 3000 plants are proposed for this infill.

One patch of *Arundo* in the drainage and is proposed for removal via cut stump treatment. The 1000 ft^2 area will be planted with 50 arroyo willow stakes between rhizomes, to allow for retreatment as needed. One cypress tree is located in the drainage, and is proposed for drill-and-fill treatment, and left in place as a snag. It is not close to the proposed stairway and thus does not pose a danger to visitors.

A second blufftop and bluff face area associated with Access F to the east is 11,843 ft^2 in size. A beach overlook is accessed through the eucalyptus trees. Plantings around the overlook and infill planting on the bluff face are proposed; 500 plants are planned. A donor site for fill north of Access F covers 6,700 ft^2; shrub and subshrubs are proposed for planting, 400 container plants supplemented by seed of southern tarweed.

ADDITIONAL:

Additional Fill Donor Sites. The extension of Santa Barbara Shores Drive has extensive berms on both sides, totaling 15,033 ft^2; 8,872 on the west side and 6,161 on the east side. The lush non-native grasses and forbs on and adjacent to the berms suggest that native bunchgrasses would be out-competed in this area. Therefore, the plant palette is Coastal Sage Scrub species, 1200 container plants. Deleted from this planting area is approximately 2000 ft^2 which is already included in the construction and corridor plantings for the proposed Coastal Trail Realignment (Refer to Figure 6).

SUMMARY HABITAT RESTORATION PLAN

Thirteen acres of habitat restoration are proposed in association with the proposed trail improvements at Ellwood Mesa**.** While the 13 acres is less than 6% of the total 224acres of the Preserve, the enhanced visitor experience and enhanced natural resource value is disproportionately large. Along the blufftop, the area between the Coastal Trail and Coastal Loop Trail and the bluff will be improved with removal of non-native fennel that blocks views of the ocean, removal of other non-native vegetation and planting with native coastal plants that are low-growing species that help hold thesoil and are visually appealing but do not block ocean views.

Other areas proposed for restoration are the cleared areas where soil is extracted from the trail-side berms for addressing trail entrenchment. The eastern bluff face and dunes at the base of the bluff are degraded with iceplant and myoporum which are proposed for removal and replacement with native vegetation. Access improvements crossing the drainages and Devereux Creek will also benefit the riparian habitats, with restoration in the creek and drainages and upland vegetation along the new trails.

The "Ellwood Mesa Coastal Trails and Habitat Restoration Design Project" is designed to retain the natural, rural feel of Ellwood Mesa while improving the access for trail and beach users while enhancing the natural resource values of the site.

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Ellwood Mesa Restoration Project
EXHIBIT 1
Preliminary Plant Layout
5/2/2013

			COMPONENT 1			COMPONENT 2			COMPONENT 3			COMP 4	COMPONENT 5				COMPONENT 6						COMPONENT 7					ADDITIONAL		
			1. Trail Sperling arking lot torealignment	2-3. Gully 1	4-5.Drainage	1. Trail to creek	2. Devereux Creek	3. Trail Re-route S creek	4.Coastal Loop Trail Bluff, West	5. Coastal Loop Trail --3 fill sites	5. Coastal Loop Trail East	2. Coastal Trail Realignment--constructed	1. De anza Trail Mesa--fill sites	2. De Anza trail realignment--reveg	4. De Anza Trail N-S eastern border narrow	5.Connector De Anza Trail & Coastal Trail-- narrow	Vernal pool eastern border	1. Coastal Blufftop E end	1. Buff face and dunes E end	1. Coastal Trail E. fill sites	2. Coastal Trail to bluff-between E&F	2. CT Fill areas n side--between E&F	Access E	Area between trails, n Access E (iceplant)	Blufftop & bluff face e of Access F; below Eucs; infill	Access F; infill	Fill donor site N Access F	Fill donor sites E & W SB Shores Drive extension	Totals	Comment
		Square Footage	1,500	2,129	18,366	391	8,428	17,185	24,737	13,584	22,812	49,000	17,782	6,000	3,000	1,600	9,409	99,461	139,352	10,493	17,341	13,798	128,793	2,659	11,843	28,811	6,700	15,033	561,075	13
Common Name	***Scientific name***	**Plant Family**																												**Acres**
Alkali ryegrass	*Leymus triticoides*	Poaceae		100	200		100																						**400**	
Arroyo Willow	*Salix lasiolepis*	Salicaceae																								50			**50**	direct cutttings
Bee Plant/California Figwort	*Scrophularia californica floribunda*	Scrophulariaceae			25			50	25									25										50	**175**	
Blue eyed grass	*Sisyrinchium bellum*	Iridaceae	25	60	100			50	50	200		200	300					200		200	100								**1485**	
Bush Lupine	*Lupinus arboreus*	Fabaceae																150					100			100			**350**	
Bush Monkey Flower	*Mimulus longiflorus*	Scrophulariaceae	10						25		15		100					50			100		100	50		50		100	**600**	
California Brome	*Bromus carinatus*	Poaceae			200	32		100				500																	**832**	
California Sunflower	*Encelia californica*	Asteraceae			25	10		50				300						100	300			200	300			200	100	200	**1785**	
California Coastal Poppy	*Eschscholzia californica var. maritima*	Papaveraceae	40						50	200		300	300					50		200			300	100		200		100	**1840**	
California Fuchsia	*Epilobium canum*	Onagraceae						75	25		25	300	100					100		100		50	100	50	50	100	25	100	**1200**	
California Goldenrod	*Solidago californica*	Asteraceae			50			100							30	20													**200**	
California Sagebrush	*Artemisia californica*	Asteraceae			50			50				300		25	30	20		25	200				250			100	100	100	**1250**	
Coast Goldenbush	*Isocoma menziesii var. menziesii*	Asteraceae											300	seed															**300**	
Coast Goldenbush, prostrate form (bluffs)	Isocoma meziessi var. sedoides	Asteraceae							100	450	200						50	300	300	200	300	200	400	50	150	300			**3000**	
Coast Live Oak	*Quercus agrifolia*	Fagaceae			15	3		20																					**38**	
Coastal Morning-glory	*Calystegia macrostegia ssp. cyclostegia*	Convolvulaceae	15	15	100			50	35	100	50	200	200	20	30	20		200	150	100	100	200	250	50	50	200	50	100	**2285**	
Comon Spikerush	*Eleocharis macrostachya*	Cyperaceae															100													
Deer Weed	*Lotus Scoparius*	Fabaceae															100	100	100		100	100	100	50			25	50	**725**	
Frankenia	*Frankenia salina*	Frankeniaceae					100																						**100**	sprigs
Giant Rye Grass	*Leymus condensatus*	Poaceae			50			40			10															50			**150**	
Gum Plant	*Grindelia camporum*	Asteraceae												seed			100											50	**150**	
Lemonade Berry	*Rhus integrifolia*	Anacardiaceae							15		15								150		50		250			100			**580**	
Meadow Barley	*Hordeum brachyantheruym ssp. branchyantherum*	Poaceae															100												**100**	
Mugwort	*Artemisia douglasiana*	Asteraceae			100			100						20	30	20							200				50	50	**570**	
Mulefat	*Baccharis salicifolia*	Asteraceae					25																						**25**	
Narrowleaf Milkweed	*Asclepias fascicularis*	Asclepiadaceae	20		25			40					100																**185**	
Pacific Sanicle	*Sanicula crassicaulis*	Apiaceae		10	25						25																		**60**	
Purple Needle Grass	*Stipa pulchra*	Poaceae	25	200	200				200	1000	250		900	25	125	75	200	400	300	1000	350	350	550	100		400			**6650**	
Quailbush	*Atriplex lentiformis*	Chenopodiaceae									25								200		50		250		25	100			**650**	
Rock Lettuce	*Dudleya lanceolata*	Crassulaceae																	200		50				25	25			**300**	
Salt Grass	*Distichlis spicata*	Poaceae																								200			**200**	
Santa Barbara Honeysuckle	*Lonicera subspicata var. subspicata*	Caprifoliaceae			25	5	10	25					100	10	35	15												50	**275**	
Sawtooth goldenbush	*Hazardia squarrosa var squarrosa*	Asteraceae	15									300	200	25	20	30						100						50	**740**	
Seacliff Buckwheat	*Eriogonum parviflorum*	Polygonaceae							50		85							100	250		200	200	450		100	275	50	100	**1860**	
Seacliff Daisy	*Malacothrix saxatilis tenuifolia*	Asteraceae																					100			50			**150**	
Seacliff Daisy	*Malacothrix saxatilis var saxatalis*	Asteraceae										200	200					200	250	100	100		250		50	300			**1650**	
Sedge, Santa Barbara	*Carex barbarae*	Cyperaceae			10		15																						**25**	
Sedge, unidentified	*Carex sp.*	Cyperaceae			50																								**50**	
Spanish clover	*Lotus purshianus*	Fabaceae										100	200							100		100						100	**600**	
Yard Rush	*Juncus occidentalis*	Juncaceae			25		25			50																			**100**	
Western Rye	*Elymus glaucus*	Poaceae			200										200	100							400						**900**	
Western vervain	*Verbena lasiostachys var lasyostachys*	Verbenaceae		15	25		25	50	25								75									100			**315**	
Wooly Sea-blite	*Suaeda taxifolia*	Chenopodiaceae																	200				150		50	100			**500**	
TOTALS			**150**	**400**	**1500**	**50**	**300**	**800**	**600**	**2000**	**700**	**2700**	**3000**	**125**	**500**	**300**	**725**	**2000**	**2600**	**2000**	**1500**	**1500**	**4500**	**450**	**500**	**3000**	**400**	**1200**	**33,500**	
														+seed			+seed		+seed								+seed			

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Attachment 2

URBEMIS Summary

5/13/2013 5:20:47 PM

Urbemis 2007 Version 9.2.4

Summary Report for Summer Emissions (Pounds/Day)

File Name:

Project Name: Ellwood Trail Improvements

Project Location: California State-wide

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

CONSTRUCTION EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
2007 TOTALS (lbs/day unmitigated)	8.21	54.13	30.29	0.01	32.53	3.43	35.96	6.80	3.16	9.95	4,351.81
2008 TOTALS (lbs/day unmitigated)	12.87	71.15	71.20	0.03	32.65	4.66	37.31	6.84	4.28	11.12	8,401.68

Attachment 3

Ellwood Gap Analysis

STORRER
ENVIRONMENTAL
SERVICES

2565 Puesta Del Sol Road #3
Santa Barbara, CA 93105
(805) 682-2065
storrer.john@verizon.net

- DRAFT -

GAP ANALYSIS

ELLWOOD MESA COASTAL TRAILS AND HABITAT RESTORATION PROJECT

Prepared for: Santa Barbara Trails Counsel
3885 Cinco Amigos
Santa Barbara, CA 93105

Prepared by: Storrer Environmental Services
2565 Puesta Del Sol Road #3
Santa Barbara, CA 93105

Submitted: July 18, 2012

STORRER
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Ray Ford
Santa Barbara Trails Council
3885 Cinco Amigos
Santa Barbara, CA 93105

October 30, 2012

Re: Alternative to Trail Segment 1 – Ellwood Mesa Coastal Trails and Habitat Restoration Project

Dear Mr. Ford

The following is a supplement to the Gap Analysis that I prepared for the referenced project (July 18, 2012 submittal). You asked that I comment on an alternative to the proposed segment of the trail leading from the public parking lot on Hollister Avenue to the crossing of a minor tributary ("gully") to Devereux Creek referenced as "Segment 1" in the plan currently under consideration. The alternative would utilize an existing trail through the eucalyptus grove east of the "Bluffs" residential development, rather than the gully crossing as currently planned for Segment 1. The discussion focuses on potential effects on biological resources that might result from the alternative route.

I am very familiar with the path through the eucalyptus grove east of the "Bluffs" residential development. I agree with your assertion that more people use this route than crossing through the gully, simply because it's easier to negotiate.

The environmental sensitivities within the eucalyptus grove are primarily nesting birds (in particular raptors) and an autumnal (short-term) monarch butterfly aggregation site. I have observed red-tailed hawk, red-shouldered hawk, Cooper's hawk, white-tailed kite, and great-horned owl nesting in this grove in recent years. The kites, I believe have nested there nearly every year since 2005. Kites have been present through the nesting season (late winter through early summer) for the past seven years but nesting has been confirmed (at least by me) only twice. There was an active Cooper's hawk nest there in spring of 2006. Interestingly, that nest structure remains at the same location, approximately 60 feet above the woodland trail. Its present condition suggests that the

nest has been used since 2006, although I cannot confirm that. The kites tend to nest deeper in the grove, further east toward the Santa Barbara Shores subdivision. There is also a turkey vulture roost in this same grove (near the SB Shores subdivision) that has been used on and off for several years. I counted 60 turkey vultures lifting off from that roost at sunrise on 24 October 2012. The monarch butterfly aggregation site is also near the center of the grove.

In my experience, neither raptor nesting nor monarch aggregating has been deterred by the current or "historic" level of foot traffic through the grove. There are a few lateral foot paths that connect to a trail that follows the eastern boundary of the grove, but the use here is minimal and does not seem to adversely affect the monarch aggregation, raptor nests, or the turkey vulture roost.

I agree that this trail is a better option than trying to cross the two gullies. It provides for more even terrain, is equally or more scenic, and would eliminate the need for a bridge.

In summary, I do not think that the “eucalyptus grove alternative” would result in significant adverse biological impacts.

Please call me if you have any questions concerning this supplement to the original Gap Analysis.

Regards,

John Storrer
Consulting Biologist

Table of Contents

Introduction

The subject report ("Gap Analysis") was prepared in support of Santa Barbara Trails Counsel's (SBTC) proposal for a trail rehabilitation and habitat restoration project ("Project") on the Sperling Preserve, Goleta, California. The report was prepared by John Storrer of Storrer Environmental Services, under contract to SBTC.

Details of the project are provided in a report submitted to the City of Goleta ("City"), requesting initiation of environmental review and permitting (SBTC 2012).
The purpose of the GAP Analysis is to verify that biological resources along the proposed trail network are as mapped and described in various environmental documents and previous studies (e.g. 2004 Ellwood Open Space Plan and related studies).

The proposed route of the Coastal and De Anza Trails were evaluated (surveyed) in the field, using previous resource maps for comparison. These include maps prepared by Jones & Stokes (2008) and SAIC (2000) used as a basis for the 2004 Open Space Plan.

This report describes in general, the nature and condition of biological resources transected by the proposed trail system with particular attention to Environmentally Sensitive Habitat Areas (ESHA). Discrepancies or inconsistencies with previous documents are noted. General planning recommendations for future trail design and construction (e.g. trail realignment, trail rehabilitation, habitat restoration) are provided.

Method

The alignments of the Coastal and De Anza trails as shown in the project description (SBTC 2012) were surveyed on 13 and 14 July 2012. Resource maps prepared in conjunction with previous studies on Ellwood Mesa were used for reference. These include a composite map showing approximate locations of ESHA (Jones & Stokes 2008) and a map of jurisdictional wetlands (SAIC 2000). Features such as vernal pools, stands of native grasslands, and trees offering potential habitat for raptors and monarch butterflies were confirmed. Potential difficulties with resource protection and avoidance and/or conflicts with applicable land use policies were noted. Recommendations for modification to preliminary trail alignment or design were recorded.

Results

The following narratives provide an overview of resource sensitivities and constraints for the primary trail alignments. The project description (SBTC 2012) divides the Coastal and De Anza Trail system into fourteen (14) segments. That convention is followed here.

<u>Segment 1 - Parking Lot to Gully Crossing</u>

This combined segment of the Coastal/De Anza Trail crosses two gullies that drain into Devereux Creek. The overstory is comprised almost entirely of bluegum eucalyptus. The gullies have been degraded by persistent erosion and inappropriate trail use.

This large grove of bluegum provides nesting habitat for raptors (e.g. white-tailed kite, red-tailed hawk, red-shouldered hawk, Cooper's hawk). This could present seasonal constraints on trail construction and maintenance.

Segment 2 - Gully to Devereux Creek

Segment 2 borders the same stand of bluegum as Segment 1.

The same seasonal constraints regarding potential raptor nesting would apply.

Segment 3 - Alternate Coastal Trail to Devereux Creek

This segment follows the Goleta Sanitation District sewer line easement along the north side of Devereux Creek. This segment of Devereux Creek was excavated during a soil remediation project in 1997 and the subsequent restoration effort was very successful. A tributary drainage that originates on the Comstock Homes development site crosses the trail at its approximate mid-point.

Seasonal constraints on trail construction and maintenance include raptor nesting (great-horned owl, red-tailed hawk) and an autumnal monarch butterfly aggregation site at the west end of Segment 3 (at its intersection with Devereux Creek)

Segment 4 - Creek to Mesa Top

Habitat at the Devereux Creek crossing consists primarily of eucalyptus woodland. Understory vegetation within the creek channel is poorly developed and is impacted by regular trail use.

Seasonal constraints on trail construction and maintenance are the same as those listed for Segment 3 (e.g. autumnal monarch butterfly aggregation, raptor nesting).

Segment 5 – Sandpiper Boundary

There are no apparent resource constraints along this segment paralleling the eastern boundary of Sandpiper Golf Course. Mature eucalyptus trees here have supported raptor nesting (e.g. Cooper's hawk) in the past.

Segment 6 – Alternate Coastal Trail Bluff-top

Proximity to the edge of the bluff and potential for trail erosion is an issue with Segment 6, as noted in the project description (SBTC 2012). This segment is further constrained by vernal pools and a small stand of native grassland. The existing trail bisects both jurisdictional wetlands (vernal pools) and the native grassland. This would appear to place limitations trail improvements, in that widening or altering topography (i.e. crowning the trail surface) could affect pool hydrology and existing native grassland.

The presence of all these features (e.g. bluff edge, wetlands, and native grassland) poses problems for trail realignment.

Trail Segment 7 – Devereux Creek to Mesa Top

The existing trail crossing at Devereux Creek is equipped with a culvert surrounded by earthen fill. This section of Devereux Creek was subject to restoration in 1997 and it presently supports high quality riparian vegetation.

The project proposes to relocate the creek crossing to the east to reduce grade. The culvert would be replaced with a bridge. The bridge would be preferable to the current crossing because of its narrow width and under-sized culvert. The existing crossing could be re-vegetated to compensate for removal of riparian habitat for construction of the bridge.

Trail Segment 8 – Bluff-top to De Anza-Coastal Trail Split

Segment 8 does not appear to have significant resource constraints. There are scattered occurrences of native grasses, but the trail does not intersect mapped wetlands or native grassland.

Trail Segment 9 – Coastal Trail Mesa Top to Bluffs

There is a mapped vernal pool near the south end of Segment 9 that lies adjacent to the trail. Trail improvements would have to be done in a manner that does not affect pool hydrology.

Trail Segment 10 – Coastal Trail Bluff-tops

Constraints associated with Segment 10 include proximity to the edge of the bluff, in addition to vernal pools. The existing and proposed trail passes immediately adjacent to a large vernal pool at the east end of Segment 10. Trail improvements would have to consider effects on pool hydrology. It might be necessary to separate pools from the trail by fencing to avoid inadvertent impacts from recreational use.

Trail Segment 11 – De Anza to UCSB Boundary

The eastern portion of Segment 11 bisects native grasslands and runs very close to vernal pools. This is especially problematic at the east end of Segment 11 where the alignment corresponds to what is presently a narrow (approximately two-foot wide) foot trail. Westward of its approximate mid-point, Segment 11 follows a two-track road that is approximately eight feet in width. This trail/road bisects a vernal pool. A realignment of the trail is proposed to avoid the vernal pool. Presence of native grasslands poses constraints on trail realignment. Plans to widen the trail to six feet will impact native grasslands in the eastern portion of Segment 11. Moving westward from the approximate

midpoint of Segment 11, the prevailing vegetation is annual grassland and there are no vernal pools in proximity to the trail alignment.

Trail Segment 12 – De Anza UCSB Boundary to Bluff-top

There are native grasslands adjoining the existing trail on its western edge for most, if not the entire distance of Segment 12. The existing trail (a former two-track road) should provide ample space to make trail improvements while avoiding native grasslands. The eucalyptus windrow on the east edge of Segment 12 is potential nesting habitat for raptors - red-tailed hawk, white-tailed kite, and American kestrel have nested in these trees in the past. Season timing of trail construction and maintenance would avoid conflicts with nesting raptors.

Segment 13 – Beach Access F

This westernmost of the two proposed beach access points has significant issues with grade and soil erosion, as described in the project description (SBTC 2012). Vegetation consists primarily of coastal bluff scrub. Impacts to native vegetation should be avoided as much as possible in making trail improvements, both to preserve habitat value and promote soil stability. Stabilizing the trail using an "engineered" approach as proposed would provide the best solution to soil erosion and habitat preservation.

Segment 14 – Access Point E

The easternmost beach access point also presents significant erosion issues, as described in the project description (SBCT 2012). There are remnants of an old asphalt road and non-native vegetation (e.g. eucalyptus, palms, iceplant). Trail design should consider preservation of coastal bluff vegetation and removal of iceplant.

Conclusions

Field survey of the proposed Coastal and De Anza Trails on the Sperling Preserve indicates that previous resource maps (Jones & Stokes 2008, SAIC 2000) accurately depict the location of ESHA.

The proposed alignments for the Coastal and De Anza trail system conforms to existing trails. While preferable to creating new trails, it does present some conflicts with resource protection and land use policies where existing trails bisect ESHA. The extensive ESHA overlay on the Sperling Preserve presents challenges with avoidance of sensitive resources through trail realignment. Proposed trail improvements (e.g. widening, raising or "crowning") could result in direct and indirect impacts to native grasslands and vernal pools.

These trail segments or sub-segments are most constrained by biological resource issues: western portion of Segment 6; Segment 10; and western portion of Segment 11.

Recommendations

- Where feasible, the trail alignment should be adjusted (realigned) to avoid ESHA.
- Trail design should consider possible effects on vernal pool hydrology.
- Closure and restoration of some existing trails may provide opportunity for compensatory mitigation for impacts to native grassland that may occur through trail widening.
- Seasonal timing of trail construction and maintenance should be considered with respect to nesting birds, in particular raptors, and monarch butterflies.

References

Jones & Stokes. 2008. Environmentally Sensitive Habitats. Scale: 1 inch = 200 feet.

SAIC, Inc. 2000. Wetlands – Santa Barbara Shores Monarc Point Property. 1 inch = 200 feet.

Santa Barbara Trails Counsel. 2012. Ellwood Mesa Coastal Trails and Habitat Restoration Project Request. Submitted to City of Goleta Community Services Department. May 12.

Attachment 4

Response to Comments

Response to Comments

Introduction

Comments received during the 30-day public comment period for the Draft Mitigated Negative Declaration (DMND) for the Ellwood Mesa Coastal Trails and Habitat Restoration Project included written comments from 16 agencies, organizations, and individuals as well as oral testimony from 3 individuals provided during the environmental hearing on 16 April 2014.

Format of the Responses to Comments

Each comment letter, e-mail, or oral testimony is assigned a unique number with each comment individually numbered as well. Individual comments and issues within each comment letter are numbered individually along the margins. For example, comment 2-1 is the first substantive comment in Comment Letter 2; "2" represents the commenter; the "1" refers to the first comment in that letter.

Index of Comments Received

Table 1 lists all agencies, organizations, and individuals that provided written or oral comments on the DMND. As described above, each comment letter was assigned a unique number.

Table 1: Index of Comments Received on the Draft EIR

Commenter Number	Name of Commenter
1	Dianne Black – Santa Barbara County Planning and Development
2	Dr. Ingebor Cox
3	Wayne Ferrin (Environmental Hearing)
4	Richard Rojas (Environmental Hearing)
5	Dr. Ingebor Cox (Environmental Hearing)
6	Claude Garciacelay
7	Pete Hembrow and Sarah Sweeny
8	Dr. Roger Jahnke
9	Joseph Luciano
10	Paul McCaw – Santa Barbara County Public Health Department
11	Mona Miyasato – County of Santa Barbara
12	Danielle Peters
13	Eric Peterson – Santa Barbara County Fire Department
14	Richard Rojas
15	Dana Trout
16	Mark Wilkinson – Santa Barbara County Trails Council
17	Mark Wilkinson – Santa Barbara County Trails Council

Commenter Number	Name of Commenter
18	Mark Wilkinson – Santa Barbara County Trails Council
19	Edward Zutaut

Meisinger, Nick

Subject: RE: Ellwood Meas Coastal Trails and Habitat Restoration Project - Comments on Draft MND

From: Black, Dianne [mailto:Dianne@co.santa-barbara.ca.us]
Sent: Thursday, April 24, 2014 3:44 PM
To: Anne Wells
Subject: Ellwood Meas Coastal Trails and Habitat Restoration Project - Comments on Draft MND

Anne,

I am happy to see this project move forward and have a minor comment on the document.

To clearly delineate all of the jurisdictions in the area, I suggest showing the County's jurisdiction on Figure 1. This would include the remainder parcel bordering the former golf course and Isla Vista. 1-1

Thanks Anne,

Dianne Black
Assistant Director
Planning and Development
(805) 568-2086

Comment Response – Commenter 1 (Dianne Black)

Response to Comment 1-1: Comment incorporated. Figure 1 has been updated to include relevant County jurisdiction within the figure frame.

April 22, 2014

From: Ingeborg Cox MD, MPH

To: Anne Wells Advance Planning Manager

Re: Ellwood Mesa Coastal Trail & Habitat Restoration

33-17 The proposed steps at **Beach Access Point F** would replace the existing degraded asphalt in this location. **Point F** does in essence need very few steps and one does not access "the beach" like in Point E. The area accessed here has a lot of" broken shale", which in my opinion is not a fit "beach access".

The 100 steps mentioned **for point F,** and presented on the Environmental Hearing on April 16, 2014, are too narrow for the area. The depicted steps on slide 8 do not show any railings. These would be important for children, the elderly and people using prosthetic limbs to help them maneuver the steps. 2-1

For any steps being considered please use the example of the steps created by UCSB near the bluffs of the Lagoon. They are wider. After a number of steps you also encounter a platform or landing where there is seating. Then the steps continue with the same design being interrupted by a flat landing with seating.

T he material used should not become slippery with the dew and the fog, causing people to fall.

Fig. 4 does **not** appear to be the actual depiction of **Coastal Access Point E. Figure 8** (Pg 70) is the **actual depiction**. 2-2

On Fig. 4 (Pg. 19) the asphalt for removal does NOT have the elliptical curve that access point E has. The large denuded area with the horizontal paths is nowhere to be seen when you are walking down the path of Access Point E. and on Figure 8. There are three palm trees, what appears to be an old fireplace and eucalyptus trees that do not appear on Fig. 4. (Pg. 19) 2-3

If assessed safe by staff the eucalyptus trees because of their large trunks should be saved. Their location near the curve approaching **Access Point E** could be used as a sitting area by just adding a board. 2-4

The Bluffs in this area have quite a bit of erosion and if removal of the ice plant is done it should be done in stages like they are doing it at UCSB. Not using pesticides, but covering the area with plastic. And also keep in mind that El Nino is projected for next year, so waiting until it is over for removal would be safe. 2-5

The marker for **Point E, the Red brick Post,** should be made a historic marker as it has meaning to numerous people. It acts as a shrine and it definitely needs to be preserved as the plan suggests. 2-6

Access Point E is a beach access point that curves around to the right like a hairpin. Some steps at the apex could open up the other beach trail, possibly with a crossing over the bioswale.

Another set of stairs would be at the end of the curve. Why not develop both accesses? See Figure 8 2-7

People in wheelchairs need a direct approach from the Sperling Parking to the Bluffs. The pathway is in essence already there and can be seen in Figure 2. You go from point 2 directly toward the Bluffs along the fine pathway. Just make it wider and create the crossing of the gully so it can be used by wheelchairs. 2-8

Pg. 30 line 20 Comstock Homes should be called "The Bluffs", its current name. 2-9

Pg. 32 The eucalyptus trees are considered to be non native. Line 32-33 states The proposed Project would result in the removal or trimming of a number of **non-native tree** species. You need to specify which species will be "removed and trimmed". 2-10

Please remember that Eucalyptus Trees were **planted by Ellwood Cooper** and in my opinion have historical meaning. Also they are the roost for monarch butterflies when they come in the winter, and turkey vultures just about year round

NO herbicides or pesticides should be used. 2-11

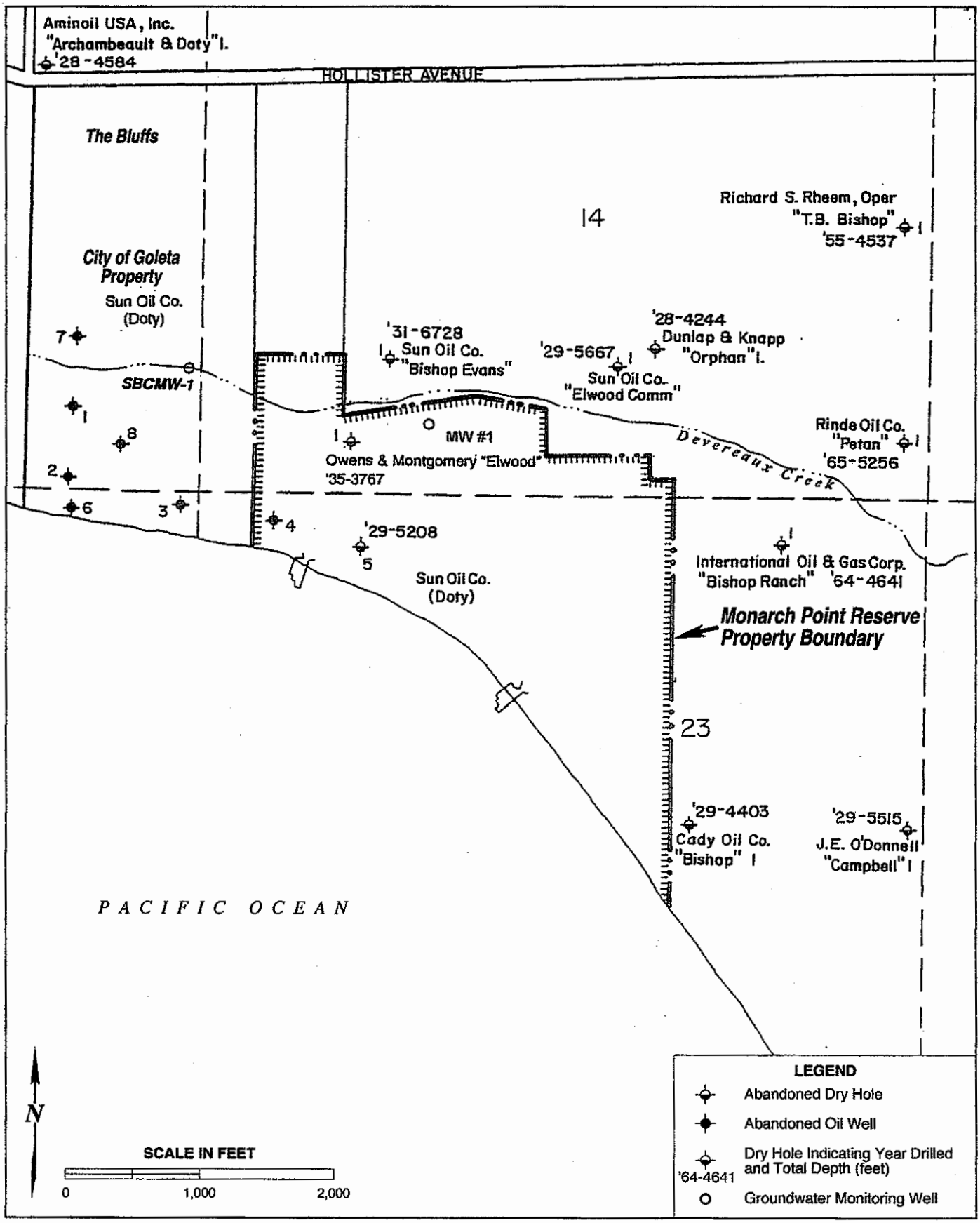
The area of the Ellwood Mesa, according to the attached Detailed Well description (Final EIR PRC 421), shows seven abandoned oil wells, 2 abandoned dry holes, and one groundwater monitoring well. The sign on the vernal pool at the Doty 5 well site reads that there were **three** former oil production and five water reinjection wells. Could you please explain the discrepancy? 2-12

Have all the oil wells on this property been abandoned correctly and meet current standards and practices of abandonment? Or do they have deficiencies like no shoe plugs, no surface plugs? Also there is no map that specifically shows their location if they still exist, even if correctly abandoned. 2-13

The crews working with heavy machinery need to know where these wells are located if the wells are still there, this information in my opinion has to be part of the Mitigated Negative Declaration. Not mentioning them gives the impression, that they are non existent.

Regarding prehistoric **site CA-SBA-1321** (pg 60-5) it states that deposits extend to a depth of 60 centimeters which is between 23 and 24 inches. If this archeological site is in the area of any of the coastal access points then "trail construction crews" should not be the ones monitoring for artifacts or human remains they are NOT trained in archeology. The City as a good practice should have a Native American and also an archeologist as monitors if this site will be disturbed. 2-14

Why are red tail hawks and owls NOT mentioned? They are inhabitants of the grove. 2-15



amec

Detailed Well Descriptions in the Project Vicinity

FIGURE 2-4

Project area (City of Goleta 2004). However, a file and records search, which was conducted at the Central Coastal Information Center (CCIC) of the California Historical Resources Information System in 2004, showed a single prehistoric archaeological site previously recorded in the Project area.

The prehistoric site within the Project area, CA-SBA-1321, was originally recorded in 1974, and was initially seen as a surface scatter of marine shell and ground stone artifacts (City of Goleta 2004). Oil wells and an oil refining operation were conducted within the site area and have apparently heavily damaged the site. Test excavations were conducted on the site (City of Goleta 2004; Onken 1997) for the Santa Barbara County Parks Department. Results of this work show that deposits extend to a depth of 60 centimeters but that they have been heavily disturbed by the oil extraction operations. This disturbance and the sparse returns of material prompted the evaluation that this site is not eligible for the California Register of Historic Resources (CRHR) (City of Goleta 2004; Onken 1997).

Thresholds of Significance

A significant impact on cultural resources would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additional thresholds are contained in the City's Thresholds Manual. The City's adopted thresholds indicate that a project would result in a significant impact on a cultural resource if it results in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of such a resource would be materially impaired.

Project Specific Impacts

a-d) As discussed previously, the Project area was surveyed for cultural resources in 1991 and no sensitive historic or cultural resources were identified. A known prehistoric site, CA-SBA-1321, is located within the Project area; however, this site is heavily damaged and is no longer intact, nor eligible for the California Register of Historic Resources.

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

Cumulative Impacts

Continued loss of cultural resources on a project-by-project basis could result in significant cumulative impacts to such resources over time; however, the Project area is not known to contain any archeological or historic resources. Additionally, implementation of MM CR-1 and

MM CR-2, which require a Cultural Resources Monitoring Plan and establish a protocol for the handling of human remains, would ensure that the Project's potential to impact cultural resources would not be cumulatively considerable in the event that any unknown cultural resources are uncovered during the implementation of the proposed Project.

Required Mitigation Measures

MM CR-1 ***Cultural Resource Monitoring Plan****: In the unlikely event that historical, archaeological, or paleontological resources are encountered during grading, work must be stopped immediately or redirected until a qualified Registered Professional Archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigation standards set forth in the City Archaeological Guidelines. If remains are found to be significant, they must be subject to a Phase 3 mitigation program consistent with City Archaeological Guidelines and funded by the Applicant.*

Plan Requirements and Timing: This requirement must be printed on all approved final grading and trail construction plans submitted for grading and land use permits.

Monitoring: City staff must convey this requirement to trail construction crews during a pre-construction meeting and conduct periodic field inspections to verify compliance during ground disturbing activities.

MM CR-2 ***Handling of Human Remains****: In the event human remains are encountered during grading, work must be stopped immediately and the remains must be treated in accordance with Health and Safety Code Section 7050.5 and CEQA Guidelines (Title 14 CCR Division 6, Chapter 3) Section 15064.5(e).*

Plan Requirements and Timing: This requirement as well as an appropriate point of contact to be contacted in the event that human remains are discovered must be printed on all final grading and trail construction plans submitted to the City for grading and land use permits.

Monitoring: City staff must convey this requirement to trail construction crews during a pre-construction meeting and conduct periodic field inspections to verify compliance during ground disturbing activities.

Residual Impacts

With implementation of MM CR-1 and MM CR-2, which require a Cultural Resources Monitoring Plan and establish a protocol for the handling of human remains, residual Project-specific impacts as well as the Project's contribution to cumulative impacts on historical, archaeological, paleontological resources, as well as human remains, would be less than significant.

Comment Response – Commenter 2 (Dr. Ingebor Cox)

Response to Comment 2-1: Comment noted. Beach Access Point F is shown as an existing beach access point in the City of Goleta General Plan and Coastal Land Use Plan (GP/CLUP). The design of the stairs includes sawn wood and decomposed granite material, which are intended to provide improved traction using more natural materials and forms for various climatic conditions. Additionally, the proposed steps are narrow in width in order to reduce the amount of native vegetation removal that would occur as a result of implementation of the proposed improvements. While railings and the suggested platforms may offer increased accessibility to trail users, these elements would increase the visibility of the proposed steps and would not be in keeping with the design principles developed during the December 2012 meeting involving the public, which seek to balance needed trail improvements while minimizing alterations by optimizing the use of lower-profile design features and natural materials. Further, due to the natural slope of the bluff face, the construction of platforms between steps would not be feasible without significant grading.

Response to Comment 2-2: Comment noted. Figure 4 and Figure 8 both depict Beach Access Point E; however, each figure shows a different view and is intended to convey a different aspect of the proposed Project elements at Beach Access Point E. Figure 4 is a plan view that is intended to depict the habitat restoration that would occur within the vicinity of Beach Access Point E as a result of the proposed Project. Figure 8 is an oblique aerial view of the existing access point that shows the approximate configuration of the proposed bioswales and downdrains, which would address long-term erosion-related issues.

Response to Comment 2-3: Comment noted. The location of the asphalt is based on mapping presented during the public outreach meeting on December 2012. The asphalt curves slightly as it descends down the bluff as depicted in Figure 4. Additionally, the denuded areas along the trail are associated with the vertical bluff face. This area appears adjacent to the trail as a result of the viewpoint in the figure. Further, this area may have been recolonized by bluff vegetation after the aerial photograph was captured (December 2013). Regardless, the intent of this figure is to show the areas in which restoration would occur under the proposed Project.

Response to Comment 2-4: Comment noted. As described under the Aesthetics and Visual Resources section, as well as in other locations throughout the DMND, immature eucalyptus trees (i.e., saplings) at Beach Access Point E would be extensively trimmed in order to remove the existing asphalt. However, no native tree species or mature eucalyptus would be removed as a part of the proposed Project. However, in keeping with the design principles developed during the second outreach meeting in December 2012, no seating areas are included as a part of the proposed Project.

Response to Comment 2-5: Comment noted. Please refer to the habitat restoration plan (Attachment 1). Where feasible, black plastic tarping would be used for iceplant removal. These areas suitable for tarping include relatively flat, sunny areas without significant native plant coverage. Hand pulling is proposed around native shrubs as well as in shaded areas including the area under the eucalyptus canopy at Beach Access Point E. Total eradication of iceplant is planned for the restoration area; these areas would be replanted with native species to restore native habitat and to reduce indirect erosion impacts.

Response to Comment 2-6: Comment noted. As described in the Project Description, the proposed Project would preserve the red brick post.

Response to Comment 2-7: Comment noted. In keeping with the design principles developed during the second outreach meeting in December 2012, no steps are proposed at Beach Access Point E. Additionally, by not including steps at Beach Access Point E, the proposed Project provides an alternative beach access point for those trail users who have difficulty navigating the steps proposed at Beach Access Point F.

Response to Comment 2-8: Comment noted. The project would include three crossings along Trail Segments 1 and 2, which would facilitate access from Sperling Parking Lot across Gully A, Drainage A, and Devereux Creek. Additionally, the preferred option, which would include a switch back immediately following Devereux Creek would further reduce the grade associated with the shared Coastal-Anza trail and would increase access on Ellwood Mesa. While, the secondary option would continue to afford access to the bluff, it would make access slightly more difficult as the grade associated with this option is greater than that associated with the preferred option. Widening this secondary access options would require substantially great volumes of grading and impact native habitats.

Response to Comment 2-9: Comment incorporated. The DMND has been revised to include "The Bluffs" in parenthesis wherever Comstock Homes is referenced within the document.

Response to Comment 2-10: Comment noted. Please refer to the habitat restoration plan (Attachment 1) for details regarding non-native tree removal. While immature eucalyptus trees would be extensively trimmed in order to remove the existing asphalt at Beach Access Point E, no mature eucalyptus trees would be removed as a part of the proposed Project.

Response to Comment 2-11: Comment noted. No pesticides would be used as a part of the proposed Project. Please refer to the habitat restoration plan (Attachment 1) regarding the use of herbicides. Herbicide use would be limited to point application for removal invasive species, and only where all other eradication methods are not feasible. Herbicide usage on Ellwood Mesa under the proposed Project would be limited to:

- Application to a Monterey cypress tree within the entrenched Beach Access Point F.
- Application to approximately 300 square feet of Harding grass and two large patches of fennel totaling 2,850 square feet within Trail Segment 3.
- Application to Harding grass within Trail Segment 4.

Response to Comment 2-12: Comment noted. The information provided regarding former production wells included within this analysis tiers off of the Comstock Homes Development and Ellwood Mesa Open Space Plan Final Environmental Impact Report (FEIR). As described in the DMND and shown in the figure attached to Comment 2-12, taken from the PRC 421 EIR (January 2014), there are seven abandon oil wells within the Project area.

Response to Comment 2-13: Comment noted. Mitigation measures associated with the implementation of the Ellwood-Devereux Open Space Plan required appropriate well abandonment through the Santa Barbara County Fire Department Fire Prevention Division (FPD) and the California Division of Oil, Gas, and Geothermal Resources (DOGGR) prior to the issuance of a Land Use Permit for the Comstock Homes Development. These mitigations required that the applicant perform the necessary abandonment and receive FPD and DOGGR verification that the mitigations were implemented and abandonment had been completed in accordance with the approved plans. Further, soil management plans were required for the trail construction areas to provide guidance for the proper handling, onsite management, and disposal of impact soil that may be encountered during construction activities. Consequently, hazardous materials associated with abandoned wells would not be expected to remain within the Project area. Further, MM HAZ-1 would require the Applicant to coordinate with the FPD and the Public Health Department – Environmental Health Services (PHD-EHS) to ensure that emergency access and hazards or hazardous materials concerns of the FPD and PHD-EHS are addressed prior to implementation of the proposed trail improvements.

Response to Comment 2-14: Comment noted. Prehistoric site CA-SBA-1321 is heavily damaged and is no longer intact, nor eligible for the California Register of Historic Resources. Consequently, monitoring of the site is not necessary under the proposed Project. No significant historical, archaeological, or paleontological resources are known to occur within the proposed

areas of ground disturbance. Potentially significant impacts to unknown cultural resources would be mitigated by MM CR-1, which requires the preparation of a Cultural Resource Monitoring Plan as well as MM CR-2, which sets requirements for handling of human remains.

Response to Comment 2-15: Comment noted. Red-tailed hawks are discussed within the Biological Resources section under Project Specific Impacts. Additionally, this species is more thoroughly addressed in the gap analysis (refer to Attachment 2). Similarly, barn owls and great horned owls are also discussed within the Biological Resources section as well as in the gap analysis. None of these species are considered special status species and none are included in the California List of Special Animals maintained by the California Department of Wildlife (CDFW). Regardless impacts to these species would be mitigated by MM BIO-1, Sensitive Species Survey, which would require a raptor survey if trail construction activities take place along the eastern and western eucalyptus windrows during the raptor breeding season (January 1 through September 15).

Ellwood Mesa MND
Environmental Review Hearing
April 17, 2014

TRANSCRIPTION

AW = Anne Wells
RB = Rita Bright
PS1= Public Speaker 1
PS2= Public Speaker 2
PS3= Public Speaker 3

AW: Welcome everyone and thank you for coming to this environmental hearing for the Ellwood Trails and Habitat Restoration Project. The purpose of this hearing is to talk about the Mitigated Negative Declaration for the project and we will be taking comments on the adequacy of the draft document. I'm Anne Wells, I think I know most of you, and I'm the Advance Planning Manager and also the environmental hearing officer for the evening. Jennifer Carman is the planning director, and Jan Hubbell is a contract planner that is helping on the project; and Rita Bright is from AMEC and they prepared the environmental document. We also have a partner with this project here Mark Wilkinson from the Santa Barbara Trails Council; this couldn't have happened without the trails council's support and the project is grant funded as a result.

So as I just said the purpose of the hearing is to receive comments on the adequacy of the draft Mitigated Negative Declaration; so we are not talking about whether or not the project should be approved; that will happen at a later time before the Planning Commission. So what we are really looking for, though I think most of you are pretty sophisticated when it comes to environmental documents, is whether or not we list an impact; under-estimated an impact; whether there is an error in the analysis; or there is additional mitigation measures that we could be considering. Again there are no decisions that we are making tonight; this hearing is being recorded (audio) through the microphone so we are going to ask that when we take public comment that you speak into the microphone and that will help us take notes afterwards. And the final document (this is a draft), when we prepare the final document it will include the response to comments that we receive tonight. We have speaker slips. If you want to speak tonight (this is a hearing so we are a little more formal under hearing), so if you could fill out speaker slips and bring them up here and we'll call your name up. Normally we have time limits, but I don't think so tonight as we are a small enough crowd. So you can let us know what your thoughts are and we can work together on that. And you can always provide written comments. You don't just have to speak tonight on the adequacy of the document. I think that the date is April 24th at 5PM you can get us your written

comment letters; you can email them to anybody up here, you can mail hard copies; we'll take your comments however we can get them.

With that going to turn the presentation over to Rita Bright and she is going to walk you through the project and the impacts that are identified in the environmental document. Thank you Rita.

RB: Thank you Anne. My name is Rita Bright and I am, as Anne mentioned, a CEQA project manager at AMEC serving as the environmental consultant in preparation of this Mitigated Negative Declaration. As Anne mentions, the project applicant is the Santa Barbara Trails Council and the project is known as the Ellwood Mesa Coastal Trails and Habitat Restoration Project. This area involves approximately 224 acres of coastal zoned recreational land all entirely within the City of Goleta. This area is known as the Ellwood Mesa Open Space Plan Area and often referred to as "Ellwood Mesa". The project site is located, as I mentioned, entirely within the coastal zone. Land uses to the north include the Hollister Avenue corridor where public access is obtained, and what's also located [to the north] is the Sperling Parking Lot [which is] a public parking lot for trail users for the Ellwood trail. To the north and east also includes the Ellwood Shores neighborhood; to the east also is the Venoco Ellwood Marine Terminal as well as Coal Oil Point Nature Reserve. To the south is the Pacific Ocean and Ellwood Beach, and to the west is Sandpiper Golf Course and the Comstock home development site now also referred to as Monarch Park.

The key project objectives of the trail council are to implement the goals of the City's Coastal Land Use Plan; to enhance and restore this trail system at Ellwood Mesa. The project itself consists of 2.1 miles of coastal trail improvements that involve the California Coastal Trail and the Juan Bautista De Anza trail, also known as the "Anza Trail". Of these 2.1 miles of trail system, approximately 1.6 miles are erosion and other improvement measures along existing trails; and there is approximately a half mile of minor realignments of trail segments chiefly to improve protection of sensitive resources on site, as well as to provide safe access and also address erosion issues in the trail system. Of this realigned area, it is entirely within the corridor envisioned in the City's General Plan and Coastal Land Use plan.

All other components include construction of three drainage crossings, (I'll get into more details of those), starting about 500 feet south of the Sperling Parking Lot, with the Drainage "A"; rather Gully "A", and Drainage "A" below that; and finally the Devereux Creek crossings. There are improvements to two beach access points that take you from the mesa to the beach, and those are known as Access Point "E" to the east and Access Point "F". And as mentioned, the project also includes approximately 13 acres of habitat restoration within Ellwood Mesa Preserve.

There were two public outreach meetings that were held in 2012, and those were in September and December. The first meeting was also a workshop and public meeting, and the second was another public meeting as well to really

enlist the community into refining this project. [What] the outcome of those meetings [were] was there was some consensus, and most of the direction/wishes the public had were aligned with the intent of the project objectives. Being that the trail should be as natural as possible and in a more natural form with varying widths; the borders should also be natural and include native plants; where there is widening or narrowing to those, that there should be restoration involving native plants; trail design to complement the existing parallel trails that do exist on the site. There was a lot of discussion of not "reinventing the wheel" but also integrating existing trail alignments as much as possible. That [the proposed] restoration should improve the natural setting, and this restoration also includes eradication of non-native species including a lot of fennel and coyote bush that sometimes and in some places serves to block scenic coastal views. Gully and creek crossings should include designs that allow safe passage. And there was also comment that those should be done with as minimal alteration or built-environment type of features as possible; and that alternatives should include options that require the least amount of change overall in the entire project.

The trail improvements envisioned for the project include re-grading to address trail braiding, and that occurs when users of the trail try to avoid erosion or "ponding" of the site after rains, and thereby [resulting with] creation of informal trails. Some of this is to address and realign the trail where it's needed to protect resources and reduce erosion; improve existing potholes that occur from erosion; in some cases, narrow the trail width, and in other cases, widening it a bit as appropriate. The drainage crossings involve, in this particular project, would be to lower the profile of improvements, improve access in a safe way, and also to mitigate for erosion that is occurring. In analyzing this project, and hearing public comment, there seemed to be a lot of concern with additional development on the site that would perhaps alter natural environment and some of the problems in these drainage crossings actually involve previous activities and development activities including storm conveyance features that have through time and sedimentation caused problems. So, some of these improvements are really associated with removal of the previously built environment and minimizing the amount of measures needed but improving safe access and improved drainage.

[Regarding] Gully "A", as I mentioned, the project is proposing a culvert crossing, and this includes a 18"diameter drain that is sized enough to accommodate the flow as engineered as well as allow for wildlife passage. This would be an area in Gully "A" that would… [refers to slide in power point presentation]. As you can see in the lower photo, it's the northern red segment there, and as mentioned includes a culvert with rock reinforcements to mitigate for some erosion and a gentler slope in that area for passage. There is also Drainage "A" and Devereux Creek which would use a boardwalk type of bridge that has been engineered to be low profile enough not to require handrails, and yet provide for safe access across those crossings while allowing for necessary drainage from storm events to occur. [Referring to power point presentation] and this is a cross section of the Devereux Creek crossing and again as you can see the darker grey segment

would be where the boardwalk crossing would occur and it is of a mild enough grade and as low as possible to allow for flow but not require the handrails to allow for safe access.

AW: Rita, I think I need to interject as I added a couple photos into that slide. I believe that the crossing right there showing the boardwalk is for the second drainage on the Drainage "A" to the north; But that the same kind of boardwalk that would be used across Devereux Creek. I just wanted to clarify that that isn't exactly the photo of Devereux Creek, that is Drainage "A", but it's the same type of platform that we would be using, it would just be longer to get across Devereux Creek.

RB: I'm glad that you did. That's necessary for the record, thank you Anne. And as we mentioned, there are two beach access improvements that are components of this project. Access point "E" has been historically used by the Santa Barbara Shores neighborhood and at some points in time there was even vehicular access to the beach. And through time there has been substantial erosion and very limited access from this point. So the proposed project also include measures to improve safe access down to the beach; to re-contour this access point slightly to allow for a lower grade of trail access from what presently exists; to remove asphalt and other human built features including footings from historic restroom that's no longer there, and to have more of a ramp style, using native fill, [a ramp] that would take one to the beach safely, where there is currently some break off in elevation at that point. There would be some drainage improvements in this area that include two bio-swales to capture run-off, two related down drains, and removal of non-native vegetation including ice plant in some areas as well as revegetation of some areas with coastal sage scrub and bluff habitat species.

Beach access improvements to Access point "F" – this as well is an older trail that was used to access oil facilities and maintenance of those facilities near the beach, and has been used for public access as well. One of the key components of improvement in this area for public access would be installation of approximately 100 steps in the trail as simulated in this upper right photo in the corner [refers to power point presentation]. There would also be removal of a fire pit in this location. Erosion control measures that would include, as you can see [refers to power point] in that green alignment, is a gravel infiltration trench which then feeds into a perforated pipe and takes storm water away from the trail access and conveys it in a down drain. Again there would be habitat restoration in this area. It's a bit hard to see but it's in the light model green as well in the areas that are white [refers to power point].

So to summarize some of the key components of beach access improvements includes: the stairway at Beach Access Point "F", and as you can see in that "signalation", the intent is to use a very natural type of material and tone – these would be wood type of steps that are treated but not with toxic materials. [And] removal of the remnant asphalt at Beach Access point "E" which is causing some erosion issues and drainage improvements and erosion control measures.

As I mentioned the habitat restoration on the site is approximately 13 acres of restoration. It would be focused in areas including the drainage crossings, replacing any native species and habitat at a ratio of between 3 and 4 to 1; and also, restoration of the beach access points and along the trail corridor. There would be monitoring and maintenance that would be occurring for a period of five years and on a quarterly basis.

So those are the main components of the project description, and just to go through and summarize the impacts that were determined to warrant analysis in this Mitigated Negative Declaration. The impacts included those to biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, recreation and transportation. And as noted on the slide [refers to power point presentation], most of these impacts are really associated with short term effects related to the construction activities involved in restoration and improvements. Some of these resources actually have beneficial effects in the long term including biological resources and recreational resources. (And I would say a number of things.)

Regarding biological resource impacts, the trail construction would occur within wetland habitats within the areas of Drainage "A" and Devereux Creek. They would involve minor removal of native vegetation, approximately 500 SF to as much as approximately1,000 SF, and as I mentioned there would be mitigation at a much higher ratio in restoration in those areas. Trail construction could indirectly impact sensitive wildlife during the construction periods. Mitigations included in the Biological Resource Analysis would be limitations to construction restrictions, pre-construction surveys to evaluate the status of any nesting birds or other sensitive species on site at the time that construction was ready to commence, as well as the Native Habitat Restoration requirements.

With respect to cultural resources, the project area was surveyed in 1991 and at that time no sensitive resources were identified within the areas proposed for improvements and restoration. As is typically required, mitigations would include that during grading activities, if cultural resources are identified that work would stop immediately and comply with requirements to insure that qualified archaeologists, Native American representatives, and other technical specialists are retained and approved by the City for evaluation of any types of resources identified.

With regard to geology and soils and hydrology and water quality – during construction activities, there would be a potential for some short term erosion impacts while construction is occurring. Mitigations would include employment of best management practices to avoid erosion including storm water pollution prevention measures consistent with NPDES requirements. However, one of the main points of this whole project is to improve hydrology, drainage and erosion/sedimentation issues, so there would be overall beneficial impacts with the long term use of recreation on the site.

With regard to hazards and hazardous materials, this again is a short-term effect associated with construction equipment and limited use of herbicides to eradicate non-native species. There are proposed changes to trail width which could affect emergency access to the site and emergency access to the site has been historically taken from the Ellwood Shores area off of Santa Barbara Shores Drive. That is shown at the top of the green circle on the slide [refers to power point presentation]. There is a mitigation required that prior to construction development activities, the Santa Barbara County Fire Dept. would review an emergency access and hazards plan to ensure that there is no obstruction created as a result of the project, and this would address concerns with emergency access.

Noise – again, is a short term effect associated with construction activities. These activities would involve the use of some construction equipment on site, the installation of the screw piles on the two boardwalks that are proposed. However noise impacts are not anticipated to trigger any significant thresholds with mitigations that include scheduled construction timings that are consistent with the City of Goleta standards, shielding of equipment, and using best management practices for noise mitigation.

Recreation – during construction activities there would be a staging area in the Sperling parking lot that could a minor number of parking spaces. This is where construction equipment would be stored after the day's work. There could also be some access that would be temporarily obstructed during improvements. However, the long term impacts would be considered beneficial as a result of trail improvements, increased trail access, the longer life of trail system given less erosion, and the safety of some of the access points that are now quite steep.

With regards to transportation and traffic effects, there would be short-term incremental increases in traffic along Hollister Avenue associated with the construction period and as I mentioned a minor number of parking spaces would be used in the short term for staging areas. Mitigation would include construction schedule and coordination at a preconstruction meeting with contractors to ensure compliance with traffic safety issues and pedestrian safety issues are adhered to, and to ensure compliance with the requirements of the City of Goleta during the construction period.

This summarizes the core resource issues that were analyzed in the Mitigated Negative Declaration. As mentioned, the public comment period started on March 26th. The comments are due [the power point slide is incorrect]; comments are due April 24th, not the 25th, by 5PM. You can submit your comments to Anne Wells at the address listed. This concludes my presentation.

AW: Thank you Rita. I would call a public speaker to start public comment but I don't have any speaker slips. So if there – I'm assuming there is someone with a speaker slip, I see Wayne back there with a little piece of paper. While you're thinking about whether or not you want to comment, we did receive some public comment letters and emails since we released the Neg Dec. One of the

comments was asking about funding. Since Rachel Couch from the California Coastal Conservancy is here, I wanted to point out, as I pointed out before, that the Santa Barbara Trails Council has partnered with the City of Goleta. The grant funding I was referring to is from Rachel's agency. If that person who made that comment is here, that question is answered about how we funded this project for environmental review and design. At construction – [we] will go back with the Trails Council and seek grant funding to do construction at such point that we have the project permits. We have to issue permits, and then go to the Coastal Commission and get permits from the Coastal Commission since the project is located in the Coastal zone.

[To Public Speaker] Yes, you can hand it right to me, and then just speak into the mic so we get that audio recording.

PS1: Good evening, my name is Wayne Ferrin. I live in Santa Barbara. I've been knowledgeable of Ellwood Mesa for the last 35 years, including studies of vernal pools and grasslands. I also attended the public meeting regarding the trails in September at Ellwood School, and was concerned that some of the public didn't want to see a project move forward that altered the drainage. And I think that not only does the project treat some of the issues but the negative declaration provides an appropriate analysis that in fact there are a number of issues of degradation that need to be addressed. And so, my testimony is both supportive of moving forward, and with the idea that we are going through a review process in the next steps. There is one particular point that I do want to address and I'm going to speak partly out of ignorance cause I haven't actually done my job in reviewing the document, but if you could put up the slide regarding the trails and the numbers of stations along it might be easier for us to take a look at that than for me to describe it otherwise. The overall map of the area [yes, there it is]. Well, interesting it doesn't include what I want to talk about – the far southeast corner, I'm not sure if there is another one that you have. [staff looks for appropriate slide]. [Yes, the handout does have it, I could refer to it; I just wanted to have it up for everyone to see.] One of the great important natural aspects of Ellwood Mesa are the vernal pools. They have been a great feature, important in the acquisition; the study; and a great environmentally sensitive habitat. Fortunately, the trail system currently, and in the future hopefully, would avoid most of these. But perhaps the most important vernal pool, the one with the greatest biodiversity, in farthest southeast corner, is of course the one that the trail is adjacent to. And I appreciate all of Rita's comments, but so far we haven't addressed the issue of vernal pools as drainage crossings. Although this vernal pool straddles UCSB's jurisdiction and the City's jurisdiction, I just wanted to point out that it is the only vernal pool that may be directly affected by any activity that is there, and of course it is degraded, people used to drive their vehicles through it, there is eucalyptus growing in it, there is so much that could be done and some things are being done. But I just wanted to point out that hopefully, as the planning and implementation moves forward, that the City will work with the University in some way to link this important trail through the area next to one of the most important vernal pools in the region. And respect it and also help improve its condition. So

3-1

3-2

the fact that vernal pools weren't brought up this evening I wanted to make sure it was understood. Most of the issue may be related to UCSB's portion, but somehow, that important trail needs to move through there in a way that respects the habitat with buffers and plantings and everything else that needs to be done. You may be able to tell me that it's already being taken care of, and then I'll be happy. But at least it should be part of the record. Thank you.

AW: Thank you Wayne. It's a hearing so it's not a back and forth, but you'll get your response to comments in the final document, but we are aware of that vernal pool, and the proposal is to have a trail that goes around it.

PS1: It seems to be that way in what's presented tonight. But I wanted to make sure it was pointed out. Thank you.

PS2: Good evening, my name is Richard Rojas. I'm a resident of Goleta. I'm also the chairman of the Anza Trail foundation, so I'm very excited to see this project moving forward. I do have a couple of comments and more formal recommendations that I'll put to you in writing in a follow up letter. I did attend one of the public workshops in 2012. And I shared then, and I'll share it again, I'm going to sound like a broken record - I know that in speaking with Ms. Bright, that the project scope and probably the funding does not allow for design of improvements, especially the creek crossings and the stairs, to American's with Disability Standards. That's a reality – I'm not sure if that it's still not a possibility, especially as you go out and seek funding for the project, once specific plans and specifications are developed. So I'd really like you to be open to that because it's better to have segments that are ADA compliant than no experience at all for folks that are mobility impaired. It's so important to look out for all of our residents when we look forward. A couple of ways to do that is when you design the creek crossings, use ADA standards. Make sure the spaces between the planks are no more than a ½", that the grade is 2-3% or less than 8%, you are already designing at that level, and that the paths leading to it and away from the bridge crossings are at a similar grade, and using soil emulsifying additives – soil cement, road oil, different products are out there – at least for periods of the trail will help with stability and traction for those that are mobility impaired. And also when you design the stairway down to the beach, there are very simple standards that can be followed to accommodate and make that access more accessible. I did a quick search of the California Coastal Commission website on beach chair access, and our city doesn't have any beach chairs. I know we celebrate that we all use Goleta Beach, and they do have it beach chair accessible, but for our own City we do not have any beach chairs [access]. We do have residents that are disabled, and can't get around like many able bodied residents can, so I think we need to look to future. And if at some point we don't have the funds or we are unable to design any of the elements or parts of the trails to accessibility standards, I think it's important that the project manager to put a note in the file, because we have turnover of staff and City leaders. Someone may come back in five or ten years and say "why not", and we will be able to articulate to them whatever the reason was that we did not design to that standard. And lastly, I am the chairman of the Anza Trail

4-1

4-2

foundation, and we do have opportunities for pass-through grants from the National Park Service. So I would like to work with this group in the future moving forward to certify a segment of this trail as "Anza Trail" and look for interpretative opportunities for placing exhibits along the trail at intersections or places where you may think about putting way-finding signs in the future. So, I'll put all that in writing to you and get it to you before the deadline. 4-3

PS3: I going to write my comments later on, but [Staff asks for introduction], sorry my name is Dr. Imgur Cox, real quickly – what I wanted to do was second what the gentleman said - the fact that you should do something for people with disabilities. And there is a slide that I saw with the steps to the beach, in my opinion, are too steep. If you have, for example, at UCSB, where they have the marine biology area, they have at least 100 steps there, but what they have is, a few steps, then there is a platform, and a seating area there, and then have another set of a few steps, and then again a platform, and a seating area there. I was very much happy to have that because I injured my hip, and when I was trying to do that, it was a godsend to be able to sit down, and relax, and then you get your step again. The other thing is, that I'm seeing here, is with the 100 steps, try to see if you can find another access way that you wouldn't have to put in so many steps. I've done a lot of hiking in this area, and I know that with our hiking group, that there are currently at least four different man-made trails or however you want to call them, that you can access the beach. And some of them are very short, and if you want I can go out with you and show them to you, and perhaps you can consider those. Because right now I'm seeing that you are only considering two accesses, and I think you have more than those, and some of those would even be perhaps more economical to the City than the ones that you are considering. Those would be the things I have for right now. I will give you my comments in writing, thank you. 5-1 5-2

AW: Thank you. Do we have any other speakers? Anyone who would like to speak to the environmental analysis in the document? With no public speakers I will close the hearing and thank everybody for coming tonight and providing us with public comment. It has been a long process to get here tonight. Starting more than 2 years ago, with developing the goals of the project with standing room only crowds coming in to express their views on the development of the project description so it's nice to be here tonight with an environmental document and it is equally valuable to have your public input. So with that thank you, and reminder public comment closes next week on the 24th and then we will be going before the Planning Commission soon after that. So, thank you again.

Comment Response – Commenter 3 (Wayne Ferrin)

Response to Comment 3-1: Comment noted. Thank you.

Response to Comment 3-2: Comment noted. Over 40 vernal pools are located on Ellwood Mesa. These sensitive habitats are depicted in Figure 2 and Figure 6 in the DMND and described throughout the document with analysis of potential impacts resulting from the proposed Project presented in the Biological Resources section. Mitigations included in the proposed Project include that newly constructed segments of the Coastal and Anza Trails would be routed to avoid environmentally sensitive habitat areas (ESHA), including vernal pools and riparian habitat. The Project proposes to enhance existing vernal pools, realign sections of the Coastal Trail and the Anza Trail to avoid identified vernal pools, and add several new vernal pools by borrowing material for trail fill and restoring areas with plants unique to vernal habitats. Per the GP/CLUP, the proposed Project would realign segments of the Anza Trail to bypass a number of vernal pools on the eastern end of the Project area, including the construction of a new 1,230 foot long trail segment around the vernal pools within Segment 5. Signs and eucalyptus logs, branches, or other natural materials would be installed to guide trail users through restored areas and past trails that cross vernal pools. Additionally, as described in the restoration plan, two existing vernal pools would be enhanced as a part of the propose Project, including the vernal pool located where the Anza Trail would be realigned per the GP/CLUP as well as the vernal pool on the eastern boundary where the Coastal Trail enters Ellwood Mesa. The vernal pool indentified in Comment 3-2, which straddles the jurisdiction of the University of California Santa Barbara (UCSB) and the City of Goleta, would be enhanced with the following measures:

(a) Remove two myoporum trees south of the vernal pool, at the edge of the eucalyptus trees.

(b) Hand-weed around the existing coyote thistle, and weed-whack and rake the non-native grasses to reduce their density in the pool, with recommended maintenance occurring twice a year for several years, when grasses are first flowering, and again when regrowth is flowering.

(c) Rake duff from the center of the best vernal pools at Ellwood Mesa during the dry season and spread the duff in this pool to expand species diversity.
(d) Plant meadow barley and common spikerush in the vernal pool.
(e) Plant natives in the buffer: verbena, gum plant, purple needlegrass, and the prostrate form of coast goldenbush. Direct seed Southern tarweed as previously described.

Please refer the Biological Resources section for discussion regarding potential impacts to vernal pools and associated mitigation measures. Further, please refer to Attachment 1 for more details regarding restoration of vernal pools.

Comment Response – Commenter 4 (Richard Rojas)

Response to Comment 4-1: Comment incorporated. As described under the Gully Crossing and Boardwalk Bridges subsection and within other locations in the Project Description the existing trail would be sloped into and out of the drainage crossings at a grade of five percent. Additionally, the Project Description has been changed to include design specifications stating that the spacing between the decking on all boardwalk crossings should be no greater than 0.5 inches. However, while the suggested use of a soil emulsifying binding agent would increase accessibility for wheelchair users, this would not be in keeping with the design principles established during the December 2012 outreach meeting. These principles specifically state that the trails should have a natural surface composed of native soil. Following the addition of the 900 cubic yards of native fill material to selected trail segments, the Project would include the use of a roller compactor to bond the fill material to the existing trail segments. Additionally, the Project proposes shallow scarification using either a tractor or hand tools along the trail network to loosen several inches of the trail surface tread to establish a blended surface with native fill material.

Response to Comment 4-2: Comment noted. The proposed Project would not include elements on Ellwood Beach. Consequently, beach chairs were not considered as a part of the proposed Project.

Response to Comment 4-3: Comment noted. While the propose Project may not completely achieve ADA requirements, California Code of Regulations, Title 24, Part 2 requires that trails, paths and nature walk areas, *or portions of these* to be constructed with gradients that will permit at least partial use by wheelchair occupants. The proposed Project accomplishes this requirement with the inclusion of accessible drainage crossings and reduced trail gradients.

Comment Response – Commenter 5 (Dr. Ingebor Cox)

Response to Comment 5-1: Comment noted. While the suggested platforms may offer increased accessibility, due to the natural slope of the bluff face, the construction of platforms between steps would not be feasible without significant grading. This would not be in keeping with the design principles developed during the December 2012 meeting, which indicate that alternatives should include options that require the least amount of change possible.

Response to Comment 5-2: Comment noted. While there are other informal access points from Ellwood Mesa to the beach, these areas are not shown as access points in the GP/CLUP. Consequently, trail construction or maintenance activities along these informal access points would require an amendment to the GP/CLUP and would not be in keeping with the design principles developed during the December 2012 meeting, which indicate that alternatives should include options that require the least amount of change possible.

From: Garciacelay, Claude
Sent: Tuesday, April 15, 2014 2:19 PM
To: Hentrich, Katie
Subject: RE: RAR - Ellwood Mesa Coastal Trails and Habitat Restoration Project

Categories: RAR

Katie,

No comments from Parks. Thanks

cgarcia-01

6-1

From: Hentrich, Katie
Sent: Tuesday, March 25, 2014 5:14 PM
To: Blackmar, Merrie; Dobberteen, Matt; Drude, Kevin; Fayram, Tom; Fisher, Cathy; Frye, Jon; Garciacelay, Claude; Hufschmid, Joy; Hunt, Jeff; Klein-Rothschild, Susan; Luehrs, Mark; McCurdy, Alice; McGolpin, Scott; Naftaly, Matt; Parker, Herman; Pearson, Eric; Peterson, Eric; Peterson, James; Robertson, William; Schleich, Mark; Sneddon, Chris; Spencer, Maureen; Stark, Stephanie; Stewart, Bret; Tingos, Guy
Cc: Van Wingerden, Cam; Lackie, David; Maus-Nisich, Terri; Russell, Glenn; Bahl, Renee; Black, Dianne; Bozanich, Dennis; Allen, Heather
Subject: RAR - Ellwood Mesa Coastal Trails and Habitat Restoration Project

Affected County Department Heads and Staff,

Attached is the City of Goleta's Notice of Availability of Draft Mitigated Negative Declaration (MND) and Notice of Environmental Hearing for the Ellwood Mesa Coastal Trails and Habitat Restoration Project. The City of Goleta is **seeking public comment** on the Draft MND, which can be located at this website.

Project Title: Ellwood Mesa Coastal Trails and Habitat Restoration Project

Project Summary: The proposed project includes the following elements:

- Improvements to approximately 2.1 miles of coastal trails on Ellwood Mesa
- Construction of a culvert over an inactive gully and boardwalk style crossings over an active drainage and Devereux Creek
- Improvements to two beach access points
- Habitat restoration, including vegetation removal and planting of native species along the trail corridor

How to Respond: The Long Range Planning Division will compile departmental comments into a single County response to be issued electronically through the CEO's office. All comment letters will be combined into a single County comment letter by the RAR coordinator. Comment letters should be addressed to Anne Wells at the City of Goleta. Please e-mail comment letters (in a PDF and Word format) directly to me by Monday, **April 21, 2014** (khentrich@countyofsb.org).

If you have any questions or concerns, please feel free to contact me.

Comment Response – Commenter 6 (Claude Garciaelay)

Response to Comment 6-1: Comment noted. Thank you.

Meisinger, Nick

Subject: FW: Ellwood Trails & Habitat Restoration Design Project

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From: Sarah Sweeny [mailto:s.sweeny@me.com]
Sent: Monday, April 21, 2014 7:52 PM
To: Anne Wells
Cc: Peter Hembrow
Subject: Ellwood Trails & Habitat Restoration Design Project

Planning and Environmental Review
130 Cremona Drive, Suite B, Goleta, CA 93117
Attention of Anne Wells, Advance Planning Manager

4/21/2014

Dear Ms. Wells,

We wanted to write to include our comments in the Ellwood Trails & Habitat Restoration Design Project.

We have attended the workshops you have held, and from the beginning of the process we have asked for the trails to be kept simple, without major changes. Improvements in grading and drainage will be welcome, while overdone trails would not suit the location. Realistically, the unevenness and irregularity of the trails are what give this area its character. With manicured trails, it would become just another promenade park. It appears that the general population that have attended your workshops agree, and thankfully your proposal appears to follow this type of minimalist plan. 7-1

In addition, we feel that while it is kind of the city to consider the ADA and the needs of those who are mobility-impaired, we worry that these types of improvements will lead to overly-developed trails and stairways to the beach. This landscape is not suited for wheelchairs to begin with, and we feel that coastal access is much more suitable for mobility-impaired individuals at Goleta Beach and Haskells Beach, which are both within short driving distance of this area. 7-2

Sincerely,
Pete Hembrow
hembrow@cox.net
Sarah Sweeny
s.sweeny@me.com
7645 Carmel Beach Circle
Goleta, CA 93117

Comment Response – Commenter 7 (Pete Hembrow and Sarah Sweeny)

Response to Comment 7-1: Comment noted. As described in the Project Description the six design principles, developed during the second outreach meeting in December 2012, include reference to maintaining the natural character of the trails on Ellwood Mesa. Pursuant to these principles the proposed Project emphasizes minimal change and maintenance of the natural setting that characterizes Ellwood Mesa. Engineered drainage crossings and beach access point improvements included in the proposed Project conform to these design principles. The proposed drainage crossings at Drainage A and Devereux Creek would be constructed using a boardwalk style bridge that would be natural in character and would not substantially detract from the views along the shared Coastal-Anza Trail. Additionally, construction of Beach Access Point F, which would include a series of steps down through the entrenched areas of this access point, would be constructed using sawn wood and decomposed granite filler to create a natural aesthetic that would be generally consistent with the character of Ellwood Mesa. Consequently, impacts to visual resources resulting from the proposed Project would be less than significant; a full analysis of impacts to visual resources is presented in the Aesthetics and Visual Resources section of the DMND.

Response to Comment 7-2: Comment noted. As described in the response to Comment 7-1 the proposed Project follows the direction received during the public outreach meetings; the design principles for the proposed Project emphasize minimal change and maintenance of the natural setting that characterizes Ellwood Mesa. Improvements along the trail, including the installation of a culvert gully crossing and two boardwalk style drainage crossings as well as steps at Access Point F would improve public access and, as described in the Aesthetics and Visual Resources section, the implementation of the proposed Project would not have a substantial impact on visual resources at Ellwood Mesa.

Anne Wells

From: Dr. Roger Jahnke <DrJahnke@HealthAction.net>
Sent: Friday, April 11, 2014 3:58 PM
To: Anne Wells
Subject: ReSEND: Ellwood Trails Project Update - The Jahnke Family

Ann,

I am sure you are busy.
Can you manage the 3/25 points below?
Thanks!

From: Roger Jahnke <drjahnke@healthaction.net>
Date: Tue, 25 Mar 2014 19:26:44 -0700
To: Anne Wells <awells@cityofgoleta.org>
Subject: FW: Ellwood Trails Project Update - The Jahnke Family

Anne,

We are out of town now and we will again be out of town then – for the 4/16 meeting.
Now for work.
Then with family.

We will miss the meeting.
Have scanned the Draft MND.

Many of those who care a lot about this resource are upset about the impact of horses.
I observe two things -
1. Overall the subject of horses has not been mentioned — probably 4-5 times throughout 8-1
2. It appears that there is an assumption that these trails will be utilized by horses.
My experience is that the importation of noxious weed species is largely due to horses and that they and their fairly self centered owners degrade any trail they use with significant disregard. I love horses and I am sure you do too. So, we are not discussing the inherent relevance of horses — it is just as in regard to this open space resource in the Coastal Zone with so many great protections for the public, the land, the views and more. 8-2

Before I submit a comment , would you kindly comment on this issue -
Where are horses allowed to be, if allowed?
Are there separate trails. How will the negative impacts of horses be managed without draining tax dollars we all pay? 8-3

Thanks!

Also — two added inquiries please:
-- two of these invasive horse engendered plant invaders of the bluff region, Fennel and Mustard, are quickly eliminating the grassland and prairie on the bluff. Can you speak to how this is being or will be addressed? 8-4
-- can you state the status of the fire management plan that could significantly impact the status of the Eucalyptus forest on the eastern boundary of the monarch grove along Pebble Beach Drive? That is the western boundary of the neighborhood. Is there a plan to modify, cut , trim, thin the trees on the border? Or no? Or pending? 8-5

Thanks for all you do!

Dr Jahnke — Roger

Comment Response – Commenter 8 (Dr. Roger Jahnke)

Response to Comment 8-1: Comment noted. The proposed Project is intended to restore and enhance the existing trail system. However, it does not intend to alter the use of the trail system, including uses for hiking, cycling, or horseback riding.

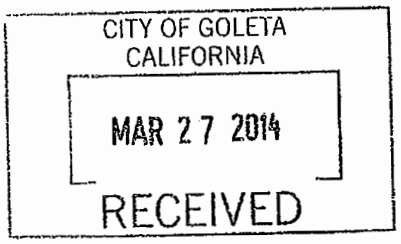
Response to Comment 8-2: Comment noted. The Ellwood Mesa Open Space Area can be accessed by an existing trail network via foot, bike, or horse along several trails. As described in the Comstock Homes Development and Ellwood Mesa Open Space Plan FEIR, approximately five percent of trail users enjoy horseback riding at Ellwood Mesa. Equestrian trails are limited to a single loop trail on the Ellwood Mesa, a total of approximately 1.5 miles of trail. Further, equestrian beach access is not permitted at Beach Access Point E and F. With regard to the issues surrounding the spread of invasive species by horseback riders, it is unclear if horses contribute to the spread of invasive species more than hikers or other recreationalists. A report provided by Adda Quinn, hosted on the National Trails Training Partnership website, indicates that scientific literature does not support the positions that horses (and horseback riding) are a major source of exotic species.

Response to Comment 8-3: Comment noted. Please see response to Comments 8-1 and 8-2. The proposed Project is intended to restore and enhance the existing trail system; it does not intend to alter the areas in which horseback riding is permitted. As described in the Comstock Homes Development and Ellwood Mesa Open Space Plan EIR equestrian trails are limited to a single loop trail on the Ellwood Mesa, a total of approximately 1.5 miles of trail. Further, equestrian beach access is not permitted at Beach Access Point E and F. Ongoing management, including management of equestrian use, would not be changed as a result of the proposed Project.

Response to Comment 8-4: Comment noted. The proposed Project includes removal of fennel and mustard within the trail corridor as a part of restoration activities. Under the proposed Project these areas would be replanted with native vegetation. However, as described in the response to Comment 8-3, there would be no change to the management of equestrian use on Ellwood Mesa.

Response to Comment 8-5: Comment noted. The Goleta Community Wildfire Protection Plan (CWPP) was reviewed and approved the CWPP as a Programmatic Plan on 20 March 2012. The City is currently preparing the Ellwood Mesa Implementation Plan, which is still pending and has not yet been published and distributed for public review.

March 25, 2014



Joseph Luciano
289 Sylvan Drive
Goleta, CA 93117-2108

(805) 967-9556
otis.kanab@cox.net

Planning and Environmental Review
130 Cremona Drive Suite B
Goleta, CA 93117

Ms Anne Wells,

I received the notice today regarding the Ellwood Mesa Coastal Trails & Habitat Restoration Project.

I don't feel qualified to comment technically regarding this project but I am disappointed that the notice fails to identify the financial aspect of the project. If, as the notice indicates, the declaration is complete, surely the anticipated costs are known. 9-1

What will the project cost and what is the source of the funds? How does this affect Goleta's operating budget?

Sincerely
Joseph Luciano

Comment Response – Commenter 9 (Joseph Luciano)

Response to Comment 9-1: Comment noted. This issue was addressed during the Environmental Review Hearing hosted at the Goleta City Council Chambers on 17 April 2014. The Santa Barbara Trails Council has partnered with the City of Goleta and the grant funding was provided by the California Coastal Conservancy. The City of Goleta is the Lead Agency and will issue permits for the proposed Project, but given the Project site location in the coastal zone, the proposed Project is also subject to California Coastal Commission (CCC) review and approval subsequent to City approval. After the City of Goleta and the Santa Barbara Trails Council have obtained all necessary permits, and barring any appeal(s), the City of Goleta and the Santa Barbara Trails Council will seek additional grant funding for trail construction.

Meisinger, Nick

Subject: FW: Draft MND - Ellwood Mesa Coastal Trails & HabResto -Case No. 13-039-CUP

From: McCaw, Paul [mailto:Paul.McCaw@sbcphd.org]
Sent: Thursday, April 24, 2014 3:32 PM
To: Anne Wells
Subject: Draft MND - Ellwood Mesa Coastal Trails & HabResto -Case No. 13-039-CUP

Hi Ms. Wells,

Paul Jenzen of EHS forwarded the subject document to me.

I am the supervisor of the Site Mitigation Unit which formerly resided in the County Fire Department but was moved along with the entire HazMat Unit to County Public Health Department Environmental Health Services at the beginning of this FY.

Site Mitigation Unit oversaw the assessment and in-place closure of oil sumps with the open space on the Mesa. We also required and approved the soil management plan referenced in the DMND.

Therefore, wherever the DMND makes reference to the Fire Department relating to the oil-impacted soil, soil management plan, etc. please replace the Fire Dept with Santa Barbara County PHD Environmental Health Services. Please be careful not to replace FD with PHD-EHS for issues not related to the soil management plan or oil-impacted soil. If you need to include our contact info in the document please see my signature block below. 10-1

The DMND appears to require our involvement with regards to the oil-impacted soil. One very important note is that EHS' Site Mitigation Unit is a cost-recovery program with an hourly rate of $157. This would include time for us to coordinate, review and approve plans as well as provide field oversight, consultations and other services related to overseeing the proposed work as it relates to the soil management plan and oil-impacted soil. 10-2

If it's not appropriate to incorporate this information in the actual EIR then it will need to be communicated to appropriate City staff to ensure they're aware of this as a requirement of the project. To request our oversight the City will need to submit a completed Remedial Action Agreement and Voluntary Remedial Oversight Program Application. The forms can be found at:
http://www.countyofsb.org/uploadedFiles/phd/EHS/EHS_Assets/VROP%20Agreement%20Final.doc and
http://www.countyofsb.org/uploadedFiles/phd/EHS/EHS_Assets/VROP%20Application%20Final_2013-07-17.doc. 10-3

Please feel free to contact me if you any questions.

Best Regards,

Paul McCaw
Hazardous Materials Supervisor
LUFT/Site Mitigation Unit Programs
Hazardous Materials Unit
Environmental Health Services
Santa Barbara County Public Health Department
2125 South Centerpointe Parkway, Room 333
Santa Maria, California 93455
Ph: (805) 346-8359
FAX: (805) 346-8485

Comment Response – Commenter 10 (Paul McCaw)

Response to Comment 10-1: Comment incorporated. The DMND has been revised to include the Santa Barbara County Public Health Department - Environmental Health Services (PHD-EHS) wherever the DMND references the Fire Department relating to the oil-impacted soil or soil management plan.

Response to Comment 10-2: Comment noted. Thank you.

Response to Comment 10-3: Comment noted. Thank you.

April 22, 2014

Anne Wells – Advance Planning Manager
City of Goleta
130 Cremona Drive
Goleta, CA 93117

E-Mail: awells@cityofgoleta.org

Re: Notice of Availability of Draft Mitigated Negative Declaration and Notice of Environmental Hearing – Ellwood Mesa Coastal Trails & Habitat Restoration Project

Dear Ms. Wells,

Thank you for the opportunity to comment on the Draft Mitigated Negative Declaration for the City of Goleta's Ellwood Mesa Coastal Trails & Habitat Restoration Project. At this time, the County is submitting the attached letters from the County Fire Department and the County Parks Department.

11-1

The County has no further comments on this project at this time and looks forward to hearing more about the project's progress. If you should have any further questions, please do not hesitate to contact my office directly, or David Lackie, Interim Director in the Office of Long Range Planning at (805) 568-2023.

Sincerely,

Mona Miyasato
County Executive Officer

cc: Eric Peterson, Division Chief, Fire Department
Claude Garciacelay, Park Planner, Parks Department
David Lackie, Interim Director, Long Range Planning Division, Planning & Development
` Department

Attachments: March 28th Letter, Fire Department
April 15th E-Mail, Parks Department

Comment Response – Commenter 11 (Mona Miyasato)

Response to Comment 11-1: Comment noted. The comments included in these letters are addressed individuals in response to Commenters 6 and 13.

Meisinger, Nick

Subject: FW: Ellwood Mesa Coastal Trails

From: Danielle Peters [mailto:dlpeters2@verizon.net]
Sent: Friday, April 11, 2014 6:35 PM
To: Anne Wells
Subject: Ellwood Mesa Coastal Trails

Hi, I just saw a posting on Facebook about the Ellwood Mesa trails.

I think habitat restoration is a great idea if that means planting native plants and maybe some milkweed for the monarchs to feed on but I would hate to see the trails developed. They are better in a natural state. Part of what makes Goleta such a wonderful place to live is the feeling that you are still connected to a natural environment. I grew up in the L.A. area where the riverbeds were cemented and all of the parks were very much planned and manicured. It was stifling. I am worried that Goleta is beginning to suffer some of the LA creep with all of the recent development. Please keep the nature areas a wild as possible. 12-1

Thanks,

Danielle Peters

Comment Response – Commenter 12 (Danielle Peters)

Response to Comment 12-1: Comment noted. As described in the design principles for the proposed Project, which were developed during the second outreach meeting in December 2012, the proposed Project would maintain the natural character of Ellwood Mesa. Restoration is designed such that it would improve the natural setting of Ellwood Mesa and enhance user experience. As described in the Project Description as well as the habitat restoration plan (refer to Attachment 1), the proposed restoration would remove non-native invasive species, including fennel and mustard, within the trail corridor and would restore approximately 13 acres native vegetation, including sensitive species such as southern tarplant. While some marginal areas of native habitat would be removed as a result of the construction of new trail or drainage crossings, native habitat removal would total just 0.11 acres. Further, this impact would be self-mitigated as the Project proposes to restore approximately 13 acres of native habitat. Consequently, any incremental impacts to native habitat or ESHAs as a result of the proposed Project would be mitigated onsite. Native plant requirements are further described in mitigation measure MM BIO-2.

Fire Department

"Serving the community since 1926"

HEADQUARTERS

4410 Cathedral Oaks Road
Santa Barbara, CA 93110-1042
(805) 681-5500 FAX: (805) 681-5563

Michael W.Dyer
Fire Chief
County Fire Warden

Christian J. Hahn
Deputy Fire Chief

March 28, 2014

Ms. Anne Wells, Advance Planning Manager
Planning Department
City of Goleta
130 Cremona Drive, #B
Goleta, CA 93117

Dear Ms. Wells:

SUBJECT: Ellwood Mesa Coastal Trails and Habitat Restoration Project

The above project is located within the jurisdiction of the Santa Barbara County Fire Department.

1. Access shall be provided from Santa Barbara Shores Drive out to the bluffs on the existing alignment. The access would be a nominal width of 10 feet of graded roadway with a 6 inch aggregate base over compacted native soils.

2. Installation of a sign at the access point at the end of Santa Barbara Shores Drive that indicates the road is impassable during inclement weather.

13-1

The Fire Prevention Division must be notified of any changes to the project proposal. Further intensification of use or change in the project description may cause conditions to be imposed.

As always, if you have any questions or require further information, please telephone me 805-681-5554 or 805-681-5523.

In the interest of life and fire safety,

Eric Peterson
Fire Marshal

Comment Response – Commenter 13 (Eric Peterson)

Response to Comment 13-1: Comment noted. In an e-mail correspondence dated 31 July 2014. Ms. Sara Iza (Department of Planning and Environmental Review) indicated that she and Dwight Peppin (SBCFPD) agreed that the improved access road should be included in the CWPP Fire Plan (Ellwood Implementation). Consequently, the requested element has not been included in the proposed Project, but will be included in the CWPP Fire Plan (Ellwood Implementation), which is still under preparation as described in the response to Comment 8-5.

Richard A. Rojas

6029 Paseo Palmilla, Goleta, CA 93117
E-mail: ricro77@hotmail.com

April 16, 2014

Anne Wells, Planning Manager
Planning and Environment Review
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

Re: Ellwood Mesa Coastal Trails and Habitat Restoration Project Request;
City Case # 13-029-CUP

Dear Ms. Wells:

I am writing you to provide comments and a few recommendations for the Ellwood Mesa Coastal Trails and Habitat Restoration Project's Draft Mitigated Negative Declaration (DMND). I hope that you will share my comments with City Council members and Planning Department staff for consideration.

After carefully reviewing the project's details and consultant's recommendations, I find that the project as proposed will be a great improvement over current conditions along the Ellwood Mesa and its network of informal paths and trails. That said, I recommend that the following items be considered as you finalize the DMND for adoption and begin the process of developing project plans and construction specifications for key elements of the trail. 14-1

In speaking to Ms. Hubbell at a recent City of Goleta Parks and Recreation Commission meeting, I learned that the goal of the project was to improve access to the trails and beach at Ellwood Mesa and not construct those improvements to current Americans with Disabilities (ADA) standards. As she shared, the budget for the project did not allow for ADA design, sighting and construction. While I understand the physical barriers, project scope and budgetary limits of the project as it's currently proposed, incorporating some ADA designs into the current project will expand its use and overall accessibility. Here are a few suggestions:

1. Creek and Swale Crossings; design boardwalk decking to meet current ADA standards. Maximum grade between 3-5% and spacing 14-2

between deck surface of 1/2'" or less and include elevated curbs on exposed boardwalk edges. Use Trex or similar recycled wood/plastic construction materials for low maintenance and durability.

2. Trail surface stabilization; recommend using a soil emulsifying binding agent mixed with native soils for increased surface stability and lower maintenance. Commercially available products such as Road Oyl, Mountain Goat Soil Stabilizer and Soil Cement have been proven to improve accessibility by persons in wheelchairs and limited mobility, improve trail surface life, reduce the cost of on-going trail maintenance and found to be environmentally safe. 14-3
3. Beach Access Point "F"; recommend including design specifications and construct the new stairs using ADA standards with maximum step height of 9" and minimum step width of 36". 14-4

By incorporating specific ADA design features into elements planned for this project, the City of Goleta will demonstrate to all residents that they are committed to improving accessibility to Ellwood Mesa, its trails and beaches, while also increasing its eligibility for Federal, State and local funding for this project. As the Chairman of the Anza Trail Foundation, I believe that including an Anza Trail alignment within the project's scope will improve the City's eligibility for National Park Service Cooperative and Cost-Share Grant funds for future Anza Trail signs and interpretive exhibits. 14-5

If for any reason the City chooses not to incorporate ADA design standards into the Ellwood Mesa Coastal Trails and Habitat Restoration Project, I would urge the project manager to include a "Note to File" describing how the decision not to include ADA design standards was reached. This will inform future City Councils, staff and consultants on why the City chose not to use ADA design and construction standards for this project. 14-6

Lastly, as our City looks to the future and the possibility of new park and open-space acquisitions, park recreation areas and trails, I would encourage its leaders to reach out and invite members of our disabled community to participate in the process by serving on a City of Goleta Accessibility Advisory Committee. Only then, will our City's disabled residents, business owners and employees have a voice in our City's future. 14-7

Respectfully,

Richard A. Rojas Sr., Chairman
Anza Trail Foundation

References:

USFS Forest Service Trail Accessibility Guidelines:
http://www.fs.fed.us/recreation/programs/accessibility/

CA State Parks Accessibility Guidelines: http://atfiles.org/files/pdf/CA-accessibility-guidelines2009.pdf

Comment Response – Commenter 14 (Richard Rojas)

Response to Comment 14-1: Comment noted. Thank you.

Response to Comment 14-2: Comment incorporated. As described under the Gully Crossing and Boardwalk Bridges subsection and within other locations in the Project Description the existing trail would be sloped into and out of the drainage crossings at a grade of five percent. Additionally, the Project Description has been changed to include a design specification that states that the spacing between the decking on boardwalk crossings should be no greater than 0.5 inches.

Response to Comment 14-3: Comment noted. While the suggested use of a soil emulsifying binding agent would increase accessibility for wheelchair users, this would not be in keeping with the design principles established during the December 2012 outreach meeting. These principles specifically state that the trails should have a natural surface composed of native soil. Following the addition of the 900 cubic yards of native fill material to selected trail segments, the Project would include the use of a roller compactor to bond the fill material to the existing trail segments. Additionally, the Project proposes shallow scarification using either a tractor or hand tools along the trail network to loosen several inches of the trail surface tread to establish a blended surface with native fill material.

Response to Comment 14-4: Comment noted. The steps would be constructed from six- by eight-foot rough sawn wood, treated with non-toxic materials, to form rectangular boxes that vary in length depending on the grade. While the new steps would be constructed to ADA standards to the extent possible, the configuration of the bluff face may not allow for nine-inch maximum steps. Further, in keeping with the design principles and in order to reduce vegetation removal, a 36-inch minimum width may not be possible for all steps given resource constraints. Please note that the proposed Project incorporates increased accessibility measures to the extent possible by reducing the trail grade where feasible and including drainage crossings. Additionally, please note that Beach Access Point E to the east would provide an elliptical ramping access that would allow for increased accessibility for those trail users who may have difficulty with the proposed steps at Beach Access Point F.

Response to Comment 14-5: Comment noted. Thank you.

Response to Comment 14-6: Comment noted. See response to Comment 4-3. While the propose Project may not completely achieve ADA requirements California Code of Regulations, Title 24, Part 2 requires only that trails, paths and nature walk areas, *or portions of these* to be constructed with gradients that will permit at least partial use by wheelchair occupants. The proposed Project clearly accomplishes this requirement with the inclusion of accessible drainage crossings and reduced trail gradients

Response to Comment 14-7: Comment noted. Thank you.

Meisinger, Nick

Subject: FW: Ellwood Trails MND

From: Dee Tee [mailto:dee3.tee@gmail.com]
Sent: Monday, April 21, 2014 10:03 AM
To: Anne Wells
Subject: Ellwood Trails MND

Hi Anne,

I like most of the proposed project for improving the trails on the Ellwood Bluffs, but do question the advisability of removing the asphalt from the road serving beach access point E.

Several years ago the asphalt was removed from the lower portion and as a consequence the now-unprotected portion of the trail experienced severe erosion.

How is the proposal to remove the asphalt in conformance with the expressed goals of trail improvement and low maintenance?

15-1

While I agree the asphalt is not a "natural" surface, it has been there for over 50 years and has prevented erosion of that access route for all that time with *no* maintenance for decades. Is the proposed new surface capable of the same feat with little or no maintenance?

Thank you,

Dana Trout
339 Coronado Drive

Comment Response – Commenter 15 (Dana Trout)

Response to Comment 15-1: Comment noted. At Beach Access Point E, the asphalt roadbed that once allowed residents from the Santa Barbara Shores neighborhood to drive down to the beach has become a substantial contributor to erosion damage. Even before removal of the lower portion of asphalt several years ago, several areas of the lower bluffs have been severely eroded as a result of water flowing down the steep, impermeable, degraded asphalt roadway at Beach Access Point E. Without addressing these issues, long-term erosion of the trail and bluff-toe would continue indefinitely. The Project proposes to remove approximately 15 cubic yards of the existing aging asphalt along Beach Access Point E, and to reduce the steepness of the grade at this location by creating a curvilinear trail. Engineered slopes included at Beach Access Points E would be required to meet established standards in the CBC and grading requirements in Chapter 15.09 of the City of Goleta Municipal Code. In order to address long-term erosion impacts, the proposed Project would establish two bioswales to capture runoff on along segments of the trail. These bioswales would be stabilized with the old asphalt removed from the roadbed or imported rock and revegetated with native species. Runoff captured in these bioswales would be directed into two drain pipes that would outlet on the beach. The downdrains would be approximately 20-30 feet in length and constructed within existing erosional gullies on the bluff face that would be backfilled with native fill material including asphalt, if acceptable, and revegetated with native species. Curvilinear alignment of the trail and installation of the bioswales would reduce runoff and convey drainage resulting in reduced long-term erosion and a reduced need for maintenance of the trail.

Meisinger, Nick

Subject: FW: Questions about Ellwood Mesa

From: Mark Wilkinson [mailto:mwilkinson@sbtrails.org]
Sent: Tuesday, April 22, 2014 8:42 AM
To: Jan Hubbell
Cc: Anne Wells; Daniel Gira
Subject: Questions about Ellwood Mesa

Hello Jan,

There a few details about the Ellwood Mesa project that need clarification. Your help is much appreciated.

1) In most areas the trail corridor restoration buffer is 20 feet wide. For the trail and stairway that goes down to the beach at Access Point E and F appear to have unique situations. For example, Access Point E comes off the bluff-top and goes down nominal 20 foot wide asphalt road that has a large depression that is relatively flat and off to the west of the trail. Do we restore the whole area in the depression or just 20 feet on either side of the trail? Depending on the rules we follow we might discover some Pampas grass that is outside the restoration area – how do you want us to address that issue? 16-1

2) Well designed trails should drain properly and require little maintenance. This is our goal. There is always a possibility that the addition of natural looking "soil stabilizers" might prove useful where soil conditions present unforeseen problems. I was wondering if the City would agree to include soil stabilizers as an option, if needed, in the Project Description. This might be needed at Access Point E or near the drainage crossings. 16-2

Regards,

Mark Wilkinson
Executive Director

Santa Barbara County Trails Council

805.708.6173 | *website*

Comment Response – Commenter 16 (Mark Wilkinson)

Response to Comment 16-1: Comment noted. The area of restoration at Beach Access Point E would strictly follow the limits in Figure 4. Eradication of invasive species outside of the identified restoration areas would not meet the scope or objectives for the proposed Project.

Response to Comment 16-2: Comment noted. In keeping with the design principles established during the December 2012 outreach meeting, the trails should have a natural surface composed of native soil. Consequently, soil stablizers shall not be used as a part of the proposed Project.

Meisinger, Nick

From: Mark Wilkinson [mwilkinson@sbtrails.org]
Sent: Tuesday, April 22, 2014 12:57 PM
To: Anne Wells
Cc: Bright, Rita; Jan Hubbell; Otis Calef ; Gira, Daniel; Meisinger, Nick
Subject: Equestrian use of Ellwood Mesa
Attachments: Horse Manure I .pdf; Environmental Aspects of Horses on Trails.pdf

SANTA BARBARA COUNTY
Trails Council

Hello Anne,

We have received a few inquiries about ongoing equestrian use at Ellwood Mesa. The horse trailer parking signs in the parking lot off Hollister Avenue imply open access. There is also a sign at the top of Access Point E that identifies restricted horse access to the beach.

I am not sure what the facts are, but my understanding is the sign was added to the top of the ramp that goes down to the beach at the request of a biologist. The purpose being to prevent people on horseback from turning left at the bottom of the pathway and heading towards the Plover nesting area. 17-1

The sign appears to have the unintended consequence of preventing equestrians from turning right and riding along the beach. Equestrians are a major source of funds for trail construction and maintenance, so you can imagine why these types of restrictions are brought to our attention. A sign on each side of the Plover nesting area saying *no dogs or horses beyond this point* seems like a good idea if it does not already exist.

Many people are under the impression that the horses are responsible for the addition of invasive plant species to recreation areas. Please find attached two articles that make the case that weed seed is primarily spread by wind, water, avians, and rodents. The articles contend that there is no documented evidence of horses spreading weeds. 17-2

Regards,

Mark Wilkinson
Executive Director

Santa Barbara County Trails Council

805.708.6173 | website

Comment Response – Commenter 17 (Mark Wilkinson)

Response to Comment 17-1: Comment noted. As described in the Ellwood Mesa Open Space Plan FEIR equestrian beach access is not permitted at Beach Access Point E and F.

Response to Comment 17-2: Comment noted. Thank you.

Meisinger, Nick

From: Mark Wilkinson [mwilkinson@sbtrails.org]
Sent: Wednesday, April 23, 2014 6:11 PM
To: Anne Wells
Cc: jhubbell@cityofgoleta.org; Bright, Rita; Meisinger, Nick; Gira, Daniel; Darlene Chirman
Subject: Draft NMD Comment | Ellwood Mesa Coastal Trails and Habitat Restoration project

Follow Up Flag: Flag for follow up
Flag Status: Flagged

SANTA BARBARA COUNTY
Trails Council

Dear Ms. Wells,

As the result of reviewing the draft MND for the Ellwood Mesa Coastal Trails and Habitat Restoration project we would like to offer two minor clarifications.

The first is that the monitoring of the habitat restoration will include a 3-year monitoring plan (see Attachment 1 of the MND) as opposed to a 5-year plan (indicated on pages 21 and 22 of the draft MND). 18-1

The second clarification is that the restoration corridor for the Connector Trail between the Coastal Trail and the Anza Trail is listed in the draft MND as a 50-foot wide area on either side of trail segment (indicated on page 16 of the draft MND, 100 feet overall); however the restoration area has a 30-foot wide restoration corridor on each side of the trail (60 feet overall). The restoration corridor for all other trail segments is correctly listed as a 10-foot wide restoration corridor on each side of the trail (20 feet overall). 18-2

If additional information is required please contact us.

Regards,

Mark Wilkinson
Executive Director

Santa Barbara County Trails Council

805.708.6173 | website

Comment Response – Commenter 18 (Mark Wilkinson)

Response to Comment 18-1: Comment incorporated. The DMND has been revised to include this clarification. The duration of monitoring for habitat restoration included in the proposed Project would be 3 years.

Response to Comment 18-2: Comment incorporated. The DMND has been revised to include this clarification. The restoration corridor for the Connector Trail between the Coastal Trail and the Anza Trail would be 30 feet on either side of the trail.

Anne Wells

From: edward zutaut <ezut@comcast.net>
Sent: Wednesday, April 02, 2014 2:51 PM
To: Anne Wells
Subject: DMND for Ellwood Mesa Coastal Trails & Habitat Restoration Project

Planning & Environmental Review
130 Cremona Drive, Suite B,
Goleta, Ca. 93117
Atttention: Anne Wells

As a resident who lives directly fronting the Coastal Loop Trail, the proposed project is of interest to me. I support most of the planned improvements for the trails as I am a daily runner on the trails.

My only concerns are with the impacts on public services associated with this project. Currently there are 4 areas of concern. 1) Almost daily I see homeless individuals sleeping along the bluff or in the fields next to the trails. I've witnessed left trash and defecation by them. 2) Several times open campfires have been left on the beach with the responsible individuals exiting the area. 3) trash containers at the two beach access points are always overflowing due to infrequent trash pickup. 4) Dogs without a leash are running after birds on the mesa daily. 19-1

My only point is that with added visitor flows from access improvement and new nearby residents of the Bluffs(where I live) and the Hideaways project certainly there will be a greater impact on the mesa. More frequent monitoring of the area(i.e. daily)will be needed and should be called out in the subject report. The city of Goleta is benefitting from substantial tax revenues from the adjacent developments and could afford a daily patrol of the mesa. Similar service upgrades have been made in other beach communities in Southern California.

Respectfully

edward zutaut
7767 Sora Court
Goleta, Ca 93117
ezut@comcast.net

Comment Response – Commenter 19 (Edward Zutaut)

Response to Comment 19-1: Comment noted. As described within Recreation section, the proposed Project, in combination with other proposed projects and a general increase in population and use intensity in the Ellwood Mesa Open Space Plan Area, could cumulatively add to a long-term trend of increased public use, access or activities in the Ellwood-Devereux Open Space Plan Area. However, implementation of the proposed Project would not result in the construction of new parking spaces or other facilities that would directly induce additional use of Ellwood Open Space Area. Instead implementation of the proposed Project would include measures (e.g., defined trails, trail maintenance, and interpretive/educational signs and trailhead information) designed to restore and enhance the existing trail system as well as increase public awareness and appreciation of natural, cultural, and recreational resources. Further, the proposed Project would remove the informal fire pit at the bottom of Beach Access Point F. As the proposed Project is largely a restoration and maintenance project that would not add additional facilities or directly facilitate increased access, its implementation would not substantially contribute to impacts associated with added use of the area.

Ellwood Mesa Coastal Trails & Habitat Restoration Project
Mitigation Monitoring and Reporting Program

Mitigated Negative Declaration for
Case # 13-039-CUP
14-MND-001

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
Air Quality				
MM AQ-1	***PM_{10} Minimization****: Dust generated during short-term trail construction activities associated with the proposed Project must be kept to a minimum consistent with the requirements of the SBCAPCD.* • *During construction, a water truck (i.e., a light pickup truck with an attached water tank) should be used for water suppression. This vehicle should be kept in a designated staging area. Water spraying must be used regularly to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 miles per hour (mph). Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.* • *Minimize amount of disturbed area and reduce on site vehicle speeds to 15 mph or less.* • *If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than two days must be covered, kept moist, or treated with soil*	The Applicant must show SBCAPCD-required dust minimization measures on all final grading, trail construction, and habitat restoration plans and adhere to these measures throughout the duration of trail construction and habitat restoration.	All final plans must be reviewed and approved by the City prior to issuance of the Coastal Use Permit (CUP).	City of Goleta Planning and Environmental Review

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
	binders to prevent dust generation. Trucks transporting fill material to and from the site must be tarped from the point of origin. • *Gravel pads must be installed at all access points to prevent tracking of mud onto public roads.* • *After clearing, grading, earth moving, or excavation is completed, disturbed must be treated area by watering, or revegetation, or by spreading soil binders until the area is paved or otherwise developed so that dust generation must not occur.* • *The City must designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. The monitor(s) must also ensure that the watering truck is kept at the proper staging area when not in use. Their duties must include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons must be provided to the SBCAPCD prior to land use clearance for project grading.* • *Prior to land use clearance, the applicant must include these dust control requirements as a note on a separate informational sheet to be recorded with a map. All requirements must also be shown on grading plans.*			
MM AQ-2	***Equipment Exhaust Minimization****: As required by APCD for all construction projects, the following regulatory requirements and control strategies, required by state law, must be adhered to throughout grading, hauling, and trail*	The Applicant must show APCD-required exhaust minimization measures on all final grading, trail	All final plans must be reviewed and approved by the City prior to	City of Goleta Planning and Environmental Review

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
	construction activities: • *Diesel-powered construction equipment must be registered with the state's portable equipment registration program or have an APCD permit.* • *Mobile construction equipment is subject to the CARB Regulation for In-use Off-Road Diesel Vehicles (Title 13 California Code of Regulations [CCR], Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter and criteria pollutant emissions from in use off-road diesel-fueled vehicles.* • *Commercial diesel vehicles are subject to Title 13 CCR § 2485, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading must be limited to five minutes; electric auxiliary power units should be used whenever possible.*	construction, and habitat restoration plans. All equipment used throughout the duration of trail construction and habitat restoration must adhere to these measures.	issuance of the CUP.	
MM AQ-3	***Reduction of Diesel Exhaust Pollutants****: The following recommended control strategies should be implemented to the maximum extent feasible in order to minimize diesel exhaust per SBCAPCD requirements:* • *Diesel construction equipment meeting the CARB Tier 1 emission standards for off-road heavy-duty diesel engines must be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.* • *Diesel-powered equipment should be replaced by electric equipment whenever feasible.*	Applicant must show SBCAPCD-recommended control strategies on all final grading, trail construction, and habitat restoration plans. All equipment used throughout the duration of trail construction and habitat restoration must adhere to these measures to the maximum extent feasible.	All final plans must be reviewed and approved by the City prior to issuance of the CUP.	City of Goleta Planning and Environmental Review

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
	• *If feasible, diesel construction equipment should be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by USEPA or California.* • *Catalytic converters should be installed on gasoline-powered equipment, if feasible.* • *All construction equipment should be maintained in tune per the manufacturer's specifications.* • *The engine size of construction equipment should be the minimum practical size.* • *The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.* • *Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.*			
Biological Resources				
MM BIO-1	***Sensitive Species Survey****: An Applicant-funded special status species survey must be conducted by a City-approved biologist immediately prior to construction. Depending on the timing of trail construction activities, the survey must include the following components:* • *If trail-construction activities on the shared Coastal-Anza Trail or the trail segments along the eastern and western eucalyptus windrows would occur within the raptor breeding season (January 1 through September 15), a raptor survey must be conducted in these areas*	The Applicant must retain a City-approved biologist to conduct a special status species survey. Where applicable, the Applicant must show the relevant avoidance buffer(s) on all final grading, trail construction, and habitat restoration plans. Additionally, the City-	The Applicant shall retain a City-approved biologist prior to the commencement of trail construction or habitat restoration. The biologist shall submit the results and	City of Goleta Planning and Environmental Review

Mitigation Measure	Responsible Party Obligation	Time Frame	Monitoring Party
to establish the current breeding status of resident raptors adjacent to the relevant trail segments. This survey component must include recommendations regarding minimizing impacts during construction per GP/CLUP Policy CE 8.2, including setbacks and restrictions on construction scheduling. If nests are documented, construction work within a 300-foot radius of active nest(s) must be suspended until the young have fledged the nest per GP/CLUP Policy CE 8.4. • *If trail-construction activities within 100 feet of the edge of the eucalyptus groves that host known monarch butterfly aggregation sites would occur during the overwintering season for monarch butterflies (October 1 through March 31), a City-approved biologist must survey all eucalyptus trees within a 100-foot distance of the relevant trail and habitat restoration areas (i.e., along the shared Coastal-Anza Trail and the western extent of the Coastal Loop Trail) to determine use by monarchs per GP/CLUP Policy CE 4.5. If butterfly aggregations are found within 100 feet of the work area, trail-construction must be halted until a City-approved biologist has determined monarchs have left the site.* • *If trail-construction activities would occur within the blooming period for southern tarplant (June 1 through September 30), a pre-construction survey must be conducted for southern tarplant. Recommendations must be made to reroute the trail around recorded individuals, limiting disturbance to the maximum extent feasible. If disturbance cannot be avoided, then*	approved biologist must make recommendations to relocate proposed new trail segments, if feasible, to avoid impacts to sensitive plant species including southern tarplant. Further, the City-approved biologist must capture and relocate sensitive beetle species (e.g., globose dune beetle or sandy beach tiger beetle) identified at the toe of the bluff at the beach access points.	recommendations of the surveys to the City. The survey must be reviewed and approved by the Planning and Environmental Review Staff prior to trail construction or habitat restoration activities.	

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
	potentially affected individuals would be relocated and/or additional southern tarplant individuals would be planted as a part of mitigation associated with the proposed Project. • *Prior to the commencement of any construction-related activities at the toe of beach access points (i.e., the interface of the bluff face and beach habitats), visual surveys for globose dune beetle and sandy beach tiger beetle must be conducted. If either of these sensitive species is observed within the footprint of the proposed trail recontouring or habitat restoration footprint individuals must be captured and relocated to adjacent suitable habitat.*			
MM BIO-2	***Native Plant Requirements****: In order to protect the genetic integrity of the native plant populations on the undeveloped portions of the subject property, the Final Restoration Plan must explicitly prohibit the use of non-locally collected native plants and seed materials restoration within or adjacent to open space areas. All seed or plant material must come from sources within the Devereux Creek watershed per GP/CLUP Policy OS 5.4(d). The Final Restoration Plan for the proposed Project must prohibit buried irrigation infrastructure; all temporary irrigation components must be placed above ground in open space areas. The potential for damage to the pipe by vandalism or exposure is considered insufficient to offset the environmental damage caused by trenching to install pipes and structures and subsequent digging to remove pipes and structures. Pipes must be inspected monthly for leaks and all leaks must be repaired promptly to avoid erosion, weed establishment, or other environmental*	The Applicant must include the Native Plant Requirements on the Final Habitat Restoration Plan**.**	The Final Habitat Restoration Plan must be reviewed and approved by the City of Goleta Planning and Environmental Review Staff prior to issuance of the CUP.	City of Goleta Planning and Environmental Review

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
	damage.			
Cultural Resources				
MM CR-1	***Cultural Resource Monitoring Plan****: In the unlikely event that historical, archaeological, or paleontological resources are encountered during grading, work must be stopped immediately or redirected until a qualified Registered Professional Archaeologist and Native American representative are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigation standards set forth in the City Archaeological Guidelines. If remains are found to be significant, they must be subject to a Phase 3 mitigation program consistent with City Archaeological Guidelines and funded by the Applicant.*	The Applicant must include the cultural resource monitoring plan requirements on all final grading, trail construction, and habitat restoration plans and adhere to these requirements throughout the duration of trail construction and habitat restoration.	All final plans must be reviewed and approved by the City of Goleta Planning and Environmental Review Staff prior to issuance of the CUP.	City of Goleta Planning and Environmental Review
MM CR-2	***Handling of Human Remains****: In the event human remains are encountered during grading, work must be stopped immediately and the remains must be treated in accordance with Health and Safety Code Section 7050.5 and CEQA Guidelines (Title 14 CCR Division 6, Chapter 3) Section 15064.5(e).*	The Applicant must include requirements for handling human remains on all final grading, trail construction, and habitat restoration plans and adhere to these requirements throughout the duration of trail construction and habitat restoration.	All final plans must be reviewed and approved by the Planning and Environmental Review Staff prior to issuance of the CUP.	City of Goleta Planning and Environmental Review
Geology and Soils				
MM GEO-1	***Design and Grading Standards****: Final grading and trail construction plans submitted to the City of Goleta for review and approval must be consistent with applicable established CBC and City of Goleta Grading Ordinance standards per City of Goleta Municipal Code § 15.09. The plans must include the location of the More Ranch Fault system and demonstrate that all structures are designed in*	The Applicant must provide a final grading and trail construction plan that is consistent with the applicable established CBC and City of Goleta Grading Ordinance. The Applicant	All final plans must be reviewed and approved by the City prior to issuance of the CUP.	City of Goleta Planning and Environmental Review

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
	compliance with earthquake standards for CBC Seismic Zone 4.	must show the location of the More Ranch Fault system on all final grading and trail construction plans		
MM GEO-2	***Blufftop Erosion Monitoring****: The City shall monitor natural seacliff erosion and retreat shall be monitored every ten years and after every El Niño winter. The City must manage the relocation of the Coastal Trail if unsafe conditions exist along the bluffs as the result of landslides, erosion, and cliff retreat.*	The City of Goleta Planning and Environmental Review Staff, or its designee, must monitor seacliff erosion and, if necessary, provide recommendations to relocate the Coastal Trail.	The City of Goleta Planning and Environmental Review Staff, or its designee, must monitor seacliff erosion and provide recommendation every ten years following implementation of trail construction and habitat restoration.	City of Goleta Planning and Environmental Review
MM GEO-3	***Best Management Practices (BMPs)****: Implementation of the proposed Project must include the following*: • *Other than what has been described for installation of the boardwalk and other improvement activities, grading must be prohibited within 50 feet of the Devereux Creek top-of-bank.* • *The Applicant must limit excavation and grading to the dry season (April 15 to November 1) unless a Building and Safety-approved erosion control plan is in place and all measures therein are in effect.*	The Applicant must show erosion-related BMPs on all final grading, trail construction, and habitat restoration plans and adhere to these measures throughout the duration of trail construction and habitat restoration.	All final plans must be reviewed and approved by the City of Goleta Planning and Environmental Review Staff prior to issuance of the CUP.	City of Goleta Planning and Environmental Review

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
	• *BMPs must be employed to control erosion, including temporary siltation protection devices such as silt fencing, straw bales, and sand bags. These must be placed at the base of all cut and fill slopes and soil stockpile areas where potential erosion may occur. The final grading plan must include erosion control measures including types and locations of BMPs. The plan must be approved by the City of Goleta prior to the commencement of grading operations.* • *The City must periodically inspect the drainage crossings and beach access points during the wet season to ensure structural integrity and avoidance of flood hazards or scouring. Maintenance and repairs must be performed as needed.*			
Hazards and Hazardous Materials				
MM HAZ-1	***Hazard Identification**: Prior to the issuance of either a grading or land use permit, the Applicant must coordinate with the SBCFD FPD and PHD-EHS to ensure that emergency access and hazards or hazardous materials concerns of FPD and PHD-EHS are addressed.*	The Applicant must contact SBCFD FPD and PHD-EHS and document written communication that all emergency access and hazards or hazardous materials concerns of FPD and PHD-EHS are addressed.	The Applicant must provide documentation of written communication to the City of Goleta Planning and Environmental Review Staff prior to the issuance of a grading permit.	City of Goleta Planning and Environmental Review/ Public Works
MM HAZ-2	***Heavy Equipment Operation**: Heavy equipment must not be operated in open space areas on days when red flag warnings are issued by the SBCFD unless FPD provides an exception given inclusion of construction-related fire*	The Applicant must show heavy equipment operation requirements on all final grading, trail	All final plans must be reviewed and approved by the City of Goleta	City of Goleta Planning and Environmental Review/ Public

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
	suppression measures during trail improvement. Additionally, all equipment used on site must be properly maintained such that no leaks of oil, fuel, or residues take place. Provisions must be in place to remediate any accidental spills. All equipment must only be stored in the appropriate equipment staging areas and construction vehicles must be confined to a pre-defined equipment access path no greater than the minimum width necessary to complete necessary construction activities.	construction, and habitat plans and adhere to these measures throughout the duration of trail construction and habitat restoration.	Planning and Environmental Review Staff prior to issuance of the CUP.	Works
Hydrology and Water Quality				
MM WAT-1	***Storm Water Permit***: *The Applicant must submit documentation of a National Pollutant Discharge Elimination System (NPDES) Storm Water Permit from the* California Regional Water Quality Control Board (RWQCB) *or must submit documentation of an exemption from permit requirements.*	The Applicant must provide documentation of a NPDES Storm Water Permit or an exemption to the City of Goleta Planning and Environmental Review Staff.	The City of Goleta Planning and Environmental Review Staff must receive a copy of the permit or exemption prior to issuance of the grading permit.	City of Goleta Planning and Environmental Review/ Public Works
MM WAT-2	***Notice of Intent****: Prior to the initiation of construction or site-preparation activities, the Applicant must file a NOI to the RWQCB pursuant to 40 Code of Federal Regulations (CFR) 122 and Goleta Municipal Code § 15.09.100.*	The Applicant must file an NOI pursuant to 40 CFR 122 and Goleta Municipal Code § 15.09.100.	The RWQCB must receive the NOI and the City of Goleta Planning and Environmental Review Staff must receive a copy of the NOI prior to the issuance of the grading permit.	RWQCB and City of Goleta Planning and Environmental Review/ Public Works
MM WAT-3	***Storm Water Pollution Prevention Plan****: The Applicant must prepare a SWPPP in accordance with the guidelines adopted by the State Water Resources Control Board*	The Applicant must submit a SWPPP.	The RWQCB and the City of Goleta Planning and	RWQCB and City of Goleta Planning and

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
	(SWRCB) covering all phases of grading and construction activities and including all requirements of the City's erosion and sediment control plan per Goleta Municipal Code § 15.09.290. The SWPPP must be prepared and submitted, along with final with grading and trail construction plans, to the City prior to the issuance of grading permits.		Environmental Review Staff must review and approve the SWPPP prior to the issuance of the grading permit.	Environmental Review/ Public Works
MM WAT-4	***Notice of Termination**: The Applicant must file a notice of termination of construction with the RWQCB implementing a SWPPP closure and identifying how pollution sources were controlled during trail construction activities.*	The Applicant must file a notice of termination pursuant to 40 CFR 122.	The RWQCB must receive the notice of termination and the City of Goleta Planning and Environmental Review Staff must receive a copy of the notice of termination within 14 days of the completion of trail construction activities.	RWQCB and City of Goleta Planning and Environmental Review/ Public Works
Noise				
MM NOI-1	***Construction Timing**: The operation or maintenance of heavy construction equipment within 500 feet of residential developments must be limited to the maximum extent feasible. Additionally, the operation or maintenance of heavy construction equipment must not occur in this area on State holidays (e.g., Thanksgiving, Labor Day).*	The Applicant must show construction timing requirements on all final grading, trail construction, and habitat restoration plans and adhere to these measures throughout the duration of trail construction and habitat restoration.	All final plans must be reviewed and approved by the City of Goleta Planning and Environmental Review Staff prior to issuance of the grading permit.	City of Goleta Planning and Environmental Review

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
MM NOI-2	***Construction Equipment****: Stationary construction equipment used on the northern segments of the shared Coastal-Anza Trail that would generate noise in excess of 65 dBA at the Project boundaries must be shielded and located as far towards the interior of the construction site as practical to minimize the noise levels at the Comstock Homes Development (The Bluffs) and the golf course to the west.*	The Applicant must show construction equipment requirements on all final grading, trail construction, and habitat restoration plans and adhere to these measures throughout the duration of trail construction and habitat restoration.	All final plans must be reviewed and approved by the City of Goleta Planning and Environmental Review Staff prior to issuance of the CUP.	City of Goleta Planning and Environmental Review
MM NOI-3	***Best Management Practices (BMPs)****: The following measures must be incorporated into final grading and trail construction plans to reduce the impact of construction noise per GP/CLUP Policy NE 6.5:* • *The Applicant must ensure that construction equipment is properly muffled according to manufacturer's specifications or as required by the City, whichever is more stringent.* • *The Applicant must place noise-generating construction equipment and locate construction staging areas away from noise-sensitive activities, where feasible, to the satisfaction of City staff.* • *The Applicant must implement noise attenuation measures which may include, but are not limited to, changing the location of stationary construction equipment, shutting off idling equipment, and installing acoustic barriers around significant sources of stationary construction noise.*	Applicant must show noise-related BMPs on all final grading, trail construction, and habitat restoration plans and adhere to these measures throughout the duration of trail construction and habitat restoration.	All final plans must be reviewed and approved by the Planning and Environmental Review Staff prior to issuance of the CUP.	City of Goleta Planning and Environmental Review
Recreation				

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
MM REC-1	***Construction-related Temporary Trail Closure Plan****: The Applicant must prepare a construction-related temporary trail closure plan, which must outline construction timing and the duration of necessary construction-related temporary trail closures. Temporary trail closures must be limited to the maximum extent feasible during trail construction and habitat restoration activities. Areas that necessitate temporary closure for trail recontouring must be roped off to protect public safety in these areas. During construction of the shared Coastal-Anza Trail realignment, safe access to Ellwood Mesa must be provided via another route. Similarly, beach access point improvements must not be constructed simultaneously; at least one access point must remain open at all times.*	The Applicant must submit a Construction-related Temporary Trail Closure Plan to the City of Goleta Planning and Environmental Review Staff and adhere to this plan throughout the duration of trail construction.	The Construction-related Temporary Trail Closure Plan must be reviewed and approved by the City of Goleta Planning and Environmental Review Staff prior to issuance of the grading permit.	City of Goleta Planning and Environmental Review/Public Works
Transportation and Traffic				
MM TT-1	***Traffic and Pedestrian Management Plan****: The Applicant must prepare a Traffic and Pedestrian Management Plan that must include, but not be limited to, designated construction worker vehicle parking and access routes, maintenance of clear trail routes (e.g., with signage) on Ellwood Mesa during construction activities, maintenance of at least one beach access point route at all times during construction, nightly removal of equipment to a designated area. The City must also provide the public with contact information in order to report immediate hazards related to the Project. This information must be provided in a public notice posted prominently on-site prior to the commencement of any Project-related activities.*	The Applicant must submit a Traffic and Pedestrian Management Plan to the City of Goleta and adhere to this plan throughout the duration of trail construction. The City must provide the public with contact information to report hazards related to the Project.	The Traffic and Pedestrian Management Plan must be reviewed and approved by the City of Goleta Planning and Environmental Review Staff prior to issuance of the grading permit. The City must provide the public with contact information prior to the commencement of	City of Goleta Planning and Environmental Review/Public Works

Mitigation Measure		Responsible Party Obligation	Time Frame	Monitoring Party
			any Project-related activities.	
MM TT-2	***Construction Schedule****: The Applicant must provide Ellwood Elementary School with a construction activity schedule and construction routes as well as the name and telephone number of a contact person responsible for the construction schedule no less than 14 days in advance of commencement of construction activities. Any alterations or additions must require a minimum seven day notification.*	The Applicant must submit a construction schedule to the Ellwood Elementary School and adhere to this schedule throughout the duration of trail construction.	The City must review and approve this schedule prior to the issuance of a grading permit. The Applicant must provide evidence of communication with Ellwood Elementary School at least 14 days in advance of the commencement of construction activities.	City of Goleta Planning and Environmental Review/ Public Works