

Sywest Industrial Building Project

Draft Environmental Impact Report
State Clearinghouse Number 2023040690

prepared by

City of Goleta
130 Cremona Drive
Goleta, California 93117
Contact: Brian Hiefield, Associate Planner

prepared with the assistance of

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

September 2024

RINCON CONSULTANTS, INC. SINCE 1994

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Table of Contents

Executive Summary ES-1
Project Synopsis ES-1
Project Objectives ES-4
Alternatives ES-5
Areas of Known Controversy ES-6
Required Approvals ES-6
Summary of Impacts and Mitigation Measures ES-8
1 Introduction 1-1
1.1 Purpose and Legal Authority 1-1
1.2 Environmental Scoping 1-1
1.3 Lead, Responsible, and Trustee Agencies 1-4
1.4 Environmental Review Process 1-5
2 Project Description 2-1
2.1 Project Applicant 2-1
2.2 Lead Agency Contact Person 2-1
2.3 Project Location 2-1
2.4 Surrounding Land Uses 2-5
2.5 Current Land Use and Zoning 2-5
2.6 Project Characteristics 2-6
2.6.1 Proposed Site Plan 2-6
2.6.2 Industrial Warehouse Building 2-6
2.6.3 Site Access and Parking 2-13
2.6.4 Utility Connections 2-13
2.6.5 Stormwater and Drainage 2-17
2.6.6 Landscaping 2-18
2.6.7 Exterior Lighting 2-21
2.6.8 Facilities Operations 2-21
2.7 Construction and Grading 2-21
2.8 Project Objectives 2-22
2.9 Required Approvals 2-22
3 Environmental Setting 3-1
3.1 Regional Setting 3-1
3.2 Project Site Setting 3-1
3.3 Cumulative Development 3-2
4 Environmental Impact Analysis 4-1

4.1 Aesthetics 4.1-1
4.1.1 Environmental Setting 4.1-1
4.1.2 Regulatory Setting 4.1-11
4.1.3 Impact Analysis 4.1-15
4.1.4 Cumulative Impacts 4.1-21
4.2 Air Quality 4.2-1
4.2.1 Environmental Setting 4.2-1
4.2.2 Regulatory Setting 4.2-6
4.2.3 Impact Analysis 4.2-11
4.2.4 Cumulative Impacts 4.2-24
4.3 Biological Resources 4.3-1
4.3.1 Environmental Setting 4.3-1
4.3.2 Regulatory Setting 4.3-30
4.3.3 Impact Analysis 4.3-40
4.3.4 Cumulative Impacts 4.3-68
4.4 Cultural Resources 4.4-1
4.4.1 Environmental Setting 4.4-1
4.4.2 Regulatory Setting 4.4-5
4.4.3 Impact Analysis 4.4-9
4.4.4 Cumulative Impacts 4.4-14
4.5 Energy 4.5-1
4.5.1 Environmental Setting 4.5-1
4.5.2 Regulatory Setting 4.5-5
4.5.3 Impact Analysis 4.5-11
4.5.4 Cumulative Impacts 4.5-14
4.6 Geology and Soils 4.6-1
4.6.1 Environmental Setting 4.6-1
4.6.2 Regulatory Setting 4.6-5
4.6.3 Impact Analysis 4.6-8
4.6.4 Cumulative Impacts 4.6-17
4.7 Greenhouse Gases 4.7-1
4.7.1 Environmental Setting 4.7-1
4.7.2 Regulatory Setting 4.7-5
4.7.3 Impact Analysis 4.7-11
4.7.4 Cumulative Impacts 4.7-18
4.8 Hazards and Hazardous Materials 4.8-1
4.8.1 Environmental Setting 4.8-1
4.8.2 Regulatory Setting 4.8-6
4.8.3 Impact Analysis 4.8-12

4.8.4 Cumulative Impacts 4.8-23
4.9 Hydrology and Water Quality 4.9-1
4.9.1 Environmental Setting 4.9-1
4.9.2 Regulatory Setting 4.9-3
4.9.3 Impact Analysis 4.9-10
4.9.4 Cumulative Impacts 4.9-26
4.10 Land Use and Planning 4.10-1
4.10.1 Environmental Setting 4.10-1
4.10.2 Regulatory Setting 4.10-2
4.10.3 Impact Analysis 4.10-4
4.10.4 Cumulative Impacts 4.10-19
4.11 Noise 4.11-1
4.11.1 Environmental Setting 4.11-1
4.11.2 Regulatory Setting 4.11-5
4.11.3 Impact Analysis 4.11-8
4.11.4 Cumulative Impacts 4.11-20
4.12 Public Services 4.12-1
4.12.1 Environmental Setting 4.12-1
4.12.2 Regulatory Setting 4.12-2
4.12.3 Impact Analysis 4.12-7
4.12.4 Cumulative Impacts 4.12-11
4.13 Transportation and Circulation 4.13-1
4.13.1 Environmental Setting 4.13-1
4.13.2 Regulatory Setting 4.13-3
4.13.3 Impact Analysis 4.13-7
4.13.4 Cumulative Impacts 4.13-10
4.14 Tribal Cultural Resources 4.14-1
4.14.1 Environmental Setting 4.14-1
4.14.2 Regulatory Setting 4.14-2
4.14.3 Impact Analysis 4.14-5
4.14.4 Cumulative Impacts 4.14-7
4.15 Utilities and Service Systems 4.15-1
4.15.1 Environmental Setting 4.15-1
4.15.2 Regulatory Setting 4.15-4
4.15.3 Impact Analysis 4.15-8
4.15.4 Cumulative Impacts 4.15-15
4.16 Effects Found Not to Be Significant 4.16-1
4.16.1 Agriculture and Forestry Resources 4.16-1
4.16.2 Mineral Resources 4.16-2

4.16.3 Population and Housing 4.16-2
4.16.4 Parks and Recreation 4.16-3
4.16.5 Wildfire 4.16-4
5 Other CEQA Required Sections 5-1
5.1 Growth Inducement 5-1
5.1.1 Population Growth 5-1
5.1.2 Economic Growth 5-1
5.1.3 Removal of Obstacles to Growth 5-2
5.2 Significant Unavoidable Effects 5-2
5.3 Irreversible Environmental Effects 5-2
5.4 Mandatory Findings 5-3
6 Alternatives 6-1
6.1 Introduction 6-1
6.2 Project Alternatives 6-2
6.2.1 Alternatives Considered but Rejected from Further Evaluation 6-2
6.2.2 Description of Alternatives Evaluated 6-4
6.3 Alternatives Impact Analysis 6-9
6.3.1 Alternative 1: No Project Alternative 6-9
6.3.2 Alternative 2: 100-foot Streamside Protection Area Setback 6-22
6.3.3 Alternative 3: Outdoor Storage 6-72
6.4 Environmentally Superior Alternative 6-111
7 References 7-1
7.1 Bibliography 7-1
7.2 List of Preparers 7-22

Tables

Table ES-1 Project Characteristics ES-2
Table ES-2 Utility Service Providers ES-3
Table ES-3 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts ES-9
Table 1-1 NOP Comments and EIR Response 1-2
Table 2-1 Project Characteristics 2-7
Table 2-2 Utility Service Providers 2-13
Table 3-1 Cumulative Projects List 3-3
Table 4.2-1 Goleta Climate Conditions 4.2-1
Table 4.2-2 Ambient Air Quality Data 4.2-5
Table 4.2-3 Federal and State Ambient Air Quality Standards 4.2-7
Table 4.2-4 SBCAG Population and Job Projections for Goleta 4.2-18
Table 4.2-5 Estimated Annual Construction Emissions 4.2-20
Table 4.2-6 Estimated Operation Emissions 4.2-21

Table 4.3-1 Study Area and Development Area Vegetation and Land Cover 4.3-7
Table 4.3-2 USACE, RWQCB, CCC, and CDFW Jurisdiction 4.3-15
Table 4.3-3 Special-Status Wildlife Species with Potential to Occur in the Study Area 4.3-21
Table 4.3-4 Project Study Area Biological Surveys 4.3-41
Table 4.3-5 Temporary Impacts on USACE, RWQCB, CCC, and CDFW Jurisdiction 4.3-57
Table 4.3-6 Uses and Development Proposed in the San Jose Creek SPA 4.3-65
Table 4.5-1 2022 Gasoline and Diesel Consumption 4.5-4
Table 4.5-2 2022 Electricity Consumption 4.5-4
Table 4.5-3 2022 Natural Gas Consumption 4.5-5
Table 4.7-1 Construction GHG Emissions 4.7-15
Table 4.7-2 Combined Unmitigated Annual GHG Emissions 4.7-16
Table 4.8-1 Historic Land Uses of Adjacent Properties of Potential Concern 4.8-2
Table 4.8-2 Hazardous Material Sites of Potential Environmental Concern 4.8-4
Table 4.10-1 Project Consistency with Applicable Coastal Zoning Code Standards 4.10-6
Table 4.10-2 Project Consistency with Applicable Land Use Policies 4.10-9
Table 4.11-1 Project Site Vicinity Noise Monitoring Results 4.11-5
Table 4.11-2 Goleta Noise and Land Use Compatibility Criteria 4.11-7
Table 4.11-3 Typical Vibration Levels From Construction Activities 4.11-9
Table 4.11-4 Caltrans Vibration Damage Potential Threshold Criteria 4.11-9
Table 4.11-5 Modeled HVAC 4.11-10
Table 4.11-6 Project Trip Generation 4.11-10
Table 4.11-7 Construction Noise Levels 4.11-12
Table 4.11-8 Loading Bay Noise 4.11-16
Table 4.11-9 HVAC Noise 4.11-17
Table 4.11-10 Combined Operational Noise Levels 4.11-17
Table 4.11-11 Predicted Increases in Traffic Noise Levels 4.11-18
Table 4.12-1 Proposed Project Induced Student Generation at GUSD and SBUSD Schools 4.12-10
Table 4.15-1 GWD Projected Water Supply and Demand in Acre-Feet 4.15-2
Table 6-1 Comparison of Project Alternatives' Buildout Characteristics 6-5
Table 6-2 Estimated Alternative 2 Annual Construction Emissions 6-35
Table 6-3 Estimated Alternative 2 Operation Emissions 6-36
Table 6-4 Construction GHG Emissions – Alternative 2 6-48
Table 6-5 Combined Unmitigated Annual GHG Emissions – Alternative 2 6-49
Table 6-6 Construction Noise Levels – Alternative 2 6-63
Table 6-7 Loading Bay Noise – Alternative 2 6-63
Table 6-8 HVAC Noise – Alternative 2 6-64
Table 6-9 Combined Operational Noise Levels – Alternative 2 6-64
Table 6-10 Estimated Alternative 3 Annual Construction Emissions 6-76
Table 6-11 Estimated Alternative 3 Operation Emissions 6-77

Table 6-12 Construction GHG Emissions – Alternative 3 6-89
Table 6-13 Combined Unmitigated Annual GHG Emissions-Alternative 3 6-91
Table 6-14 Construction Noise Levels – Alternative 3 6-104
Table 6-15 Impact Comparison of Alternatives 6-113

Figures

Figure 1-1 Environmental Review Process 1-7
Figure 2-1 Regional Location 2-2
Figure 2-2 Project Site Location 2-3
Figure 2-3 Existing On-Site Structures 2-4
Figure 2-4 Project Site Plan 2-9
Figure 2-5 Building Floor Plan 2-10
Figure 2-6 Building Roof Plan 2-11
Figure 2-7 Renderings of the Proposed Building 2-12
Figure 2-8 Utility Locations 2-15
Figure 2-9 Landscaping Plan 2-19
Figure 4.1-1 Project Site Visual Character 4.1-2
Figure 4.1-2 Project Site Views 4.1-3
Figure 4.1-3 Project Site Existing and Simulated Views from SR 217 Facing West 4.1-5
Figure 4.1-4 Project Site Proposed and Simulated Views from Northbound SR 217 ..... 4.1-6
Figure 4.1-5 Project Site Existing and Simulated Views from Kellogg Avenue 4.1-9
Figure 4.1-6 Project Site Existing and Simulated Views from South Fairview Avenue 4.1-10
Figure 4.3-1 Vegetation and Land Cover Types 4.3-6
Figure 4.3-2 National Wetlands Inventory Mapping and Wetland Sample Points 4.3-16
Figure 4.3-3 City Mapped Environmentally Sensitive Habitat and Stream Protection Area Buffers 4.3-17
Figure 4.3-4 Detention Basin Outfall Wetland Delineation 4.3-18
Figure 4.11-1 Ambient Noise Monitoring Location 4.11-4
Figure 4.11-2 Temporary Noise Barrier Location 4.11-13
Figure 4.13-1 VMT Screening Area for Work-Based Projects 4.13-5
Figure 6.3-1 Alternative 2 Site Plan 6-8
Figure 6.3-2 Alternative 2: Existing and Simulated Views from SR 217 Facing West 6-24
Figure 6.3-3 Proposed Project: Existing and Simulated Views from SR 217 Facing West 6-25
Figure 6.3-4 Alternative 2: Proposed and Simulated Views from Northbound SR 217 6-26
Figure 6.3-5 Proposed Project: Proposed and Simulated Views from Northbound SR 217 6-27
Figure 6.3-6 Alternative 2: Existing and Similated Views from Kellogg Avenue 6-28
Figure 6.3-7 Proposed Project: Existing and Simulated Views from Kellogg Avenue 6-29
Figure 6.3-8 Alternative 2: Existing and Simulated Views from South Fairview Avenue 6-30
Figure 6.3-9 Proposed Project: Existing and Simulated Views from South Fairview Avenue 6-31

Appendices

Appendix A Notice of Preparation and Public Comments Received
Appendix B Traffic and Circulation Study
Appendix C Air Quality-Greenhouse Gas Model Outputs
Appendix D Biological Resource Reports
Appendix D-1 Biological Resource Study
Appendix D-2 Update to the Biological Resource Study
Appendix D-3 Wetland Delineation Report
Appendix E Cultural Resource Reports
Appendix E-1 Archaeological Resources Assessment Memorandum
Appendix E-2 Historic Resources Evaluation Report
Appendix F Energy Calculations
Appendix G Geotechnical Report
Appendix H Preliminary Drainage Design Study
Appendix I Phase I Environmental Site Assessment
Appendix J Stormwater Control Plan
Appendix K Noise Measurements, Specifications, and Modeling
Appendix L Preliminary Water Service Determination
Appendix M Floodplain Analysis
Appendix N Sea Level Rise and Coastal Hazards Analysis
Appendix O Environmental Soils Analysis
Appendix P Health Risk Assessment Model
Appendix Q Photometric Plan
Appendix R Modeling for Project Alternatives
Appendix R-1 Alternatives Air Quality-Greenhouse Gas Model Outputs
Appendix R-2 Alternatives Health Risk Assessments
Appendix R-3 Alternatives Energy Calculations

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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed Sywest Industrial Building Project (proposed project) in the City of Goleta. This section summarizes the characteristics of the proposed project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

Project Applicant

Sywest Development
150 Pelican Way
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Lead Agency Contact Person

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Project Description

This EIR has been prepared to examine the potential environmental effects of the Sywest Industrial Building Project. The following is a summary of the full project description, which can be found in Section 2, *Project Description*.

The 11.77-acre project site is located at 907 South Kellogg Avenue (Assessor's Parcel Number 071-190-035) in Goleta, California. Existing structures on the site include a drive-in theater with an approximately 3,663 square foot concessions building, freestanding movie screen, three ticket booths, an approximately 200 square foot projector building, pad-mounted transformer, storm drain, agricultural box, and two dewatering wells. The drive in theater operations ceased in 2022 and the site has been unused since then. The proposed project involves the demolition of the existing freestanding movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box, and removal of one of the dewatering wells. The project also involves the construction of a 70,594 square foot industrial warehouse building with 60,939 square feet of landscaping, 101 parking spaces, and six loading zones.

Industrial Warehouse Building

The industrial warehouse building could be divided into up to four sections and would be available for use by up to four tenants. The building would include 7,198 square feet of office area which would be located inside the main entrance. An electrical room would be located at the northern corner of the building. Two steel doors would be constructed on the southwest and northeast sides of the building, and four steel doors would be located at the northwest side of the building and provide additional access to the building. Table ES-1 provides additional details about the proposed project.

Table ES-1 Project Characteristics

General Information	
Address	907 South Kellogg Avenue
APN	071-190-035
Height/Stories	35 feet from finish grade
Lot Area	11.77 acres total 6.75-acre development area
Industrial Warehouse Building	
Tenant Area 1	14,280 sf
Tenant Area 2	18,180 sf
Tenant Area 3	17,980 sf
Tenant Area 4	20,154 sf
Total Building Footprint	**70,594 sf**
Parking	
Standard	96 spaces
Accessible	5 spaces
Total Spaces	**101 spaces**
Total Square Feet	**113,193 sf**
Landscaping	
Total Landscaping Area	**60,939 sf**
Sidewalks	
Total Sidewalk Area	**4,910 sf**
Loading Zones	
Total Loading Zones	**6 zones**

sf = square feet

Site Access and Parking

Access to and from the project site would be provided from South Kellogg Avenue via an existing access road that runs along the northeast project boundary. This existing access road would be resurfaced. The east curb of the driveway connecting the existing access road to South Kellogg Avenue would be widened in order to provide adequate maneuvering area for delivery trucks to enter and exit the project site. In addition, a slope at the southern portion of the project site would be graded to match adjacent grade and install improvements to the driveway connecting to South Kellogg Avenue designed to allow access to the undeveloped portion of the site.

The proposed project would include a surface parking lot to the southeast of the proposed building. The parking lot would include 96 standard uncovered and 5 accessible uncovered parking spaces. In addition, the proposed project would include 10 bicycle parking spaces. Pedestrian access to and from the project site would be provided via a sidewalk which would start at South Kellogg Avenue and extend to the proposed parking lot.

Utilities

Table ES-2 summarizes the utility service providers for the proposed project.

Table ES-2 Utility Service Providers

Utility	Service Provider
Water Service	Goleta Water District
Sewer	Goleta Sanitary District
Natural Gas	Southern California Gas Company
Electricity (100 percent renewable)	Central Coast Community Energy (3CE)
Cable	Cox Communications
Telecommunications	Verizon, Qwest, AT&T, Level 3
Solid Waste	Marborg Industries

Stormwater and Drainage

Stormwater runoff from the majority of the project site consisting of the paved and landscaped areas of the parking lot and southern portion of the development area would be directed to a detention basin which would be constructed at the southern border of the development area. The proposed detention basin would function as both a filtration and detention basin and would discharge to a hydrodynamic separator. A new 18-inch outfall would be constructed in the existing San Jose Creek concrete channel wall in order to discharge overflow into the San Jose Creek.

Stormwater runoff from the northeastern portion of the project site would be directed to a vegetated drainage swale located along the eastern side of the entry driveway prior to discharge to the existing storm drain outlet located approximately 115 feet south of the intersection of South Kellogg Avenue and the entry driveway. A catch basin inlet filter would be installed at the existing storm drain outlet to treat stormwater.

The project site is within a mapped 100-year floodplain. Between 4 to 6 feet of fill would be used to elevate the proposed building above the 100-year floodplain elevation.

Landscaping

Existing vegetation within the development area, including the ice plant along the southwestern project boundary, laurel sumac shrubs behind the movie screen, and palm trees next to the concession stand, would be removed. The proposed landscaping would be comprised of native and climate appropriate plants including trees and palms, shrubs, grasses, groundcovers, vines, and espaliers. Plant species in the preliminary plant palette include, but are not limited to, California sycamore, island oak, saltbush, coast sunflower, and elderberry. Landscape treatments would be provided in the proposed detention basin, along the parking lot, along the driveway connecting to South Kellogg Avenue, and at the exterior of the proposed building.

Exterior Lighting

Proposed lighting at the project site would consist of a combination of exterior building-mounted wall packs and pole mounted fixtures in the proposed parking lot. All lighting would use light emitting diode fixtures and would include semi- and fully cut-off light fixtures. Lighting for the project site would be designed in accordance with the City and Federal Air Administration standards and Section 35-139 of the City zoning code.

Facilities Operations

The industrial warehouse building would be leased to a single or multiple tenants (up to 4) and would provide space for a variety of conforming uses allowed in accordance with the project site zoning, including indoor warehousing and storage, wholesaling and distribution, and construction and material storage. On-site uses would not include cold storage or storage of hazardous materials. The industrial warehouse building would operate Monday to Saturday from 7:00am to 6:00pm. An estimated 75 employees would occupy the project site daily. No specific tenant(s) have been identified to occupy this building at this time.

Construction and Grading

Construction of the proposed project is anticipated to begin in July 2027 and end in September 2028. Construction activities would include site preparation, grading, building construction, paving, architectural coating, and landscaping phases. Construction would occur Monday to Friday from 8:00 am to 5:00 pm. Construction staging would occur onsite, and construction personnel would park onsite. Construction debris would be hauled via United States Route 101 (U.S. 101) to the Tajiguas landfill, located at 14470 Calle Real in Goleta. Development of the proposed project would require approximately 600 cubic yards (CY) of soil cut and approximately 38,000 CY of soil fill.

Prior to construction, a 20 foot by 20 foot (400 sf) temporary staging area would be established in the San Jose Creek bed below the new storm drain outfall. Sandbag and plastic sheeting would be lowered by crane into the creek bed and a temporary cofferdam would be built in the 400 sf staging area in the creek bed to prevent water or the creek from entering the outfall construction area. The cofferdam would also prevent dirt, concrete rubble, and wet cement from coming into contact with surface water in the creek and prevent fish and other aquatic dependent species from entering the area during construction. No heavy equipment would be used or operated within this staging area in the creek bed.

Project Objectives

The primary objectives for the proposed project are as follows:

- To develop a project with long-term viability through design by providing sufficient square footage with flexibility of interior size and arrangement for up to 4 tenant spaces with 6 loading docks.
- To develop a project with sufficient height (up to 35 foot maximum) to accommodate a variety of potential tenant needs that are consistent with the General Plan/Coastal Land Use Plan designation of Service/Industrial and zoning designation of Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL).
- Attract local employment opportunities in the industrial sector and generate new property tax revenue for the City.
- Optimize economically beneficial reuse of a previously developed, disturbed, and underutilized site within the City with existing infrastructure and access on a site that has significant land use limitations, including airport, hydrologic, and flooding constraints, that limit compatible uses on the site.
- Provide a permanent critical access easement to the flood channel for the City of Goleta and the Santa Barbara County Flood Control District.

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the proposed project. Studied alternatives include the following three alternatives.

- Alternative 1: No Project Alternative
- Alternative 2: 100-foot Streamside Protection Area Setback
- Alternative 3: Outdoor Storage

Alternative 1 (No Project Alternative) assumes that the proposed project is not approved, and the industrial warehouse building is not constructed. The project site would remain a vacant drive-in theater and the existing on-site structures, including concessions building, movie screen, ticket booths, and projector buildings would not be demolished. Under this alternative, significant impacts to aesthetics, biological resources, land use, and solid waste would not occur. However, Alternative 1 would not fulfill the Project Objectives because existing conditions would be maintained, and no new development on the project site would occur.

Alternative 2 (100-foot Streamside Protection Area Setback) would include similar components as the proposed project and would be constructed on the same project site. However, the layout and shape of the proposed industrial building would be reconfigured and the location on the project site would be shifted to the northwest and southwest in order to avoid development within the San Jose Creek 100-foot SPA buffer to the extent feasible, and would also be 63 feet further from State Route 217 compared to the proposed project. Development within the 100-foot SPA would be limited to access road improvements, installation of the underground utility trench, and the addition of landscaping, which would consist of native California riparian and upper wetland habitat. Like the proposed project, the square footage of the industrial warehouse would be 70,594 sf. Due to the reconfigured footprint of the proposed building, an additional 1,600 cy of fill would be required to elevate the building above the floodplain compared to the proposed project. Like the proposed project, Alternative 2 would require demolition of the existing movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box.

Alternative 3 (Outdoor Storage) would include a 70,594 sf outdoor storage facility on the same project site as the proposed project. Alternative 3 would be developed on approximately 6.75 acres of the northeastern portion of the project site, in the same location as the proposed project. Half of the outdoor storage area would support storage of construction materials in storage bays and half would support recreational vehicle (RV) storage. Alternative 3 would include a 500-square foot office building with a restroom, which would be constructed in the northeastern corner of the project site. Like the proposed project, Alternative 3 would require demolition of the existing movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box. Like the proposed project, between 4 to 6 feet of fill would be used to elevate the outdoor storage area and office building above the 100-year floodplain elevation, which would require 37,400 CY feet of soil to be imported to the site. Like the proposed project, development of Alternative 3 would include a request to reduce the 100-foot SPA buffer at San Jose Creek to 25 feet along the entire project site boundary adjacent to San Jose Creek.

Based on the alternatives analysis, Alternative 3 (Outdoor Storage) was determined to be the environmentally superior alternative. Neither Alternative 2 nor Alternative 3 create additional environmental impacts in comparison to the proposed project. Alternative 3 would reduce the proposed project's significant and unavoidable aesthetics impacts to a less than significant level. Unlike Alternative 2, Alternative 3 would result in lesser impacts to air quality, energy, greenhouse

gas emissions, hydrology and water quality, operational noise, public services, and utilities and service systems, although Alternative 3 would not reduce the proposed project's significance conclusions in these issue areas. However, Alternative 3 would result in similar biological resources impacts as the proposed project, including a significant and unavoidable impact related to conflicts with local ordinances that protect biological resources. In addition, Alternative 3 would fail to meet the project objectives as Alternative 3 would not provide tenant space or an industrial building. Refer to Section 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

Pursuant to Section 15123(b)(2) of the CEQA Guidelines, an EIR shall identify areas of controversy known to the lead agency including issues raised by agencies and the public. Issues raised by agencies and the public during the EIR scoping process involve project impacts to tribal cultural resources, biological resources, hydrology and water quality, air quality, and greenhouse gas emissions. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the City are summarized in Section 1, *Introduction*.

Required Approvals

The proposed project requires City approval of the following:

- **Development Plan (17-121-DP).** Because the City does not have an adopted Local Coastal Program, the Development Plan must be reviewed and approved by the California Coastal Commission (CCC) following City review and action on the project. The City would evaluate and determine the Project's consistency with City policies and regulations. The proposed project would be required to obtain a Coastal Development Permit from the CCC. The CCC would evaluate the Project's consistency with State of California Coastal policies and regulations. Following discretionary approval from the CCC, the City has authority to effectuate the Coastal Development Permit and the Development Plan through issuance of a Land Use Permit (ministerial level).
- **Major Conditional Use Permit.** Grading and grubbing within 100 feet of the San Jose Creek ESHA requires a Major Conditional Use Permit.
- **Streamside Protection Area Reduction.** The City would have discretionary approval to determine if the requested Streamside Protection buffer reduction is warranted based on the criteria outlined in General Plan Policy CE 2.2. The California Coastal Commission would evaluate the reduction request against Coastal policies.
- **Demolition Permit.** The City would have ministerial approval over the issuance of a permit for the demolition of the existing freestanding movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box on the project site.
- **Building Permit.** The City would have ministerial approval over the issuance of a permit for the construction of the proposed warehouse industrial building.
- **Floodplain Manager Approval.** Prior to issuance of a development permit, the project would be required to obtain approval from the City Floodplain Manager for development within the 100-year floodplain.
- **Certificate of Acceptance.** Within 30 days of issuance of the City's discretionary permits, the property owner shall grant to the City and the City shall accept an easement for access to San Jose Creek.

- **General Plan Conformity Determination.** As required by Government Code section 65402, the City's planning commission must review and issue a report on the conformity of the aforementioned easement with the City's General Plan.

Other public agencies whose approval may be required include the following:

- **California Coastal Commission.** Approval of a Coastal Development Permit and approval of the requested Streamside Protection Area buffer reduction.
- **California Department of Fish and Wildlife.** Prior to construction, the California Department of Fish and Wildlife permits may be required for the construction of the proposed drainage outfall within San Jose Creek. The Applicant may at a minimum be required to obtain a Lake and Streambed Alteration Agreement for construction of the proposed drainage outfall.
- **Central Coast Regional Water Quality Control Board (RWQCB).** Prior to construction, the Central Coast RWQCB would require the proposed project to obtain a Water Quality Certification in accordance with Section 401 of the Clean Water Act for discharge to San Jose Creek. Discharge of dewatered groundwater to San Jose Creek would require coverage under the Central Coast RWQCB's *Waste Discharge Requirements National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges with Limited Threat to Water Quality;* Order No. R3-2022-0035, NPDES No. CAG99304. Based on the concentrations of chemical constituents of potentially contaminated groundwater, the Central Coast RWQCB may require that an individual National Pollution Discharge Elimination System (NPDES) permit and/or waste discharge requirements be obtained for dewatering activities.
- **Federal Aviation Administration.** Review of project details to determine consistency with airport safety regulations and issuance of a Determination of No Hazard to Air Navigation.
- **National Marine Fisheries Service.** Prior to construction of the proposed drainage outfall, the National Marine Fisheries Service would require the applicant to undergo federal Endangered Species Act Section 7 consultation for the potential presence of steelhead trout.
- **Santa Barbara County Flood Control District.** Prior to construction of the proposed drainage outfall, the Santa Barbara County Flood Control District would require the proposed project to obtain an encroachment permit for construction of the proposed drainage outfall.
- **Santa Barbara County Fire District.** The Santa Barbara County Fire District would provide site plan review and building safety inspection in accordance with Santa Barbara County Fire District standards.
- **State Water Resources Control Board (SWRCB).** Prior to construction, coverage would be obtained under the SWRCB's *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit).
- **United States Army Corps of Engineers.** Prior to construction, the United States Army Corps of Engineers may require the proposed project to obtain a permit in accordance with Section 404 of the Clean Water Act for construction of the proposed drainage outfall.
- **United States Fish and Wildlife Service.** Prior to construction of the proposed drainage outfall, the United States Fish and Wildlife Service would require the applicant to undergo federal Endangered Species Act Section 7 consultation for the potential presence of tidewater goby.
- **Goleta Sanitary District.** Prior to construction, the Goleta Sanitary District would require the project to obtain a Sewer Connection Permit.

- **Goleta Water District.** Prior to construction, the Goleta Water District would require the project to obtain a Can and Will Serve Letter.

Summary of Impacts and Mitigation Measures

Table ES-3 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Class I, Significant and Unavoidable**. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the *CEQA Guidelines*.
- **Class II, Less than Significant with Mitigation Incorporated**. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.
- **Class III, Less than Significant**. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **Class IV, Beneficial:** An impact that would reduce existing environmental problems or hazards.

As shown in Table ES-3, implementation of the proposed project would result in significant, unavoidable impacts associated with the following issues:

- **Aesthetics:** project-level impacts to scenic vistas and conflict with applicable zoning and other regulations governing scenic quality (Impacts AES-1 and AES-3 in Section 4.1, *Aesthetics*)
- **Biological Resources:** project-level impact due to conflict with any local policies or ordinances protecting biological resources resulting in the Streamside Protection Area (SPA) setback reduction (Impact BIO-8 in Section 4.3, *Biological Resources*)
- **Land Use:** project-level impacts due to conflict with General Plan/Coastal Land Use plans related to aesthetics and the SPA setback reduction (Impact LU-2 in Section 4.10, *Land Use and Planning*)
- **Solid Waste:** project-level and cumulative impacts related to solid waste generation during construction (short term impact only) (Impact UTIL-4 in Section 4.15, *Utilities and Service Systems*).

Table ES-3 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Aesthetics		
Impact AES-1. The proposed industrial building on the project site would have a height of 35 feet as measured from finished grade, which would affect northward scenic views of the Santa Ynez Mountains and foothills experienced by travelers on State Route 217. This impact would be Class I, significant and unavoidable.	There is no feasible mitigation that would reduce the impact level to less than significant.	Impacts would remain significant and unavoidable.
Impact AES-2. The project site is located approximately 0.9 mile from United States Route 101, which is eligible for designation as a state scenic highway throughout Goleta. The project would not impact scenic resources within a State scenic highway. There would be no impact.	None required.	No impact.
Impact AES-3. The project would permanently alter the project site, replacing existing buildings and unpaved areas with an industrial building and associated site improvements. The project would conflict with Goleta General Plan policies pertaining to the preservation of visual resources along locally designated scenic corridors, but would not conflict with applicable zoning regulations. This impact would be Class I, significant and unavoidable.	There is no feasible mitigation that would reduce the impact level to less than significant.	Impacts would remain significant and unavoidable.
Impact AES-4. The project would introduce on-site sources of light and glare; however, such sources would be consistent with City lighting regulations and Federal Aviation Administration Standards. Therefore, impacts involving light and glare would be Class III, less than significant.	None required.	Less than significant.
Cumulative Impacts. Cumulative aesthetic impacts would be less than significant, and the project's contribution would not be cumulatively considerable.	None required.	Not cumulatively considerable.
Air Quality		
Impact AQ-1. The proposed project would not conflict with or obstruct implementation of the Santa Barbara County Air Pollution Control District 2022 Ozone Plan. This impact would be Class III, less than significant.	None required.	Less than significant.
Impact AQ-2. Construction and operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the South Central Coast Air Basin region is in nonattainment under applicable federal or State ambient air quality standards. Therefore, impacts related to construction and operation would be Class III, less than significant.	None required.	Less than significant.
Impact AQ-3. Project construction, operation, or the combined construction and operation toxic air contaminant emissions would not expose sensitive receptors to substantial pollutant emissions. Impacts would be Class III, less than significant.	None required.	Less than significant.
Impact AQ-4. The proposed project would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people. Therefore, project impacts would be Class III, less than significant.	None required.	Less than significant.
Cumulative Impacts. The project would not exceed any of the Santa Barbara County Air Pollution Control District thresholds, nor conflict with or obstruct implementation of the 2022 Ozone Plan. Therefore, the project would not have a cumulatively considerable contribution to cumulative air quality impacts.	None required.	Not cumulatively considerable.
Biological Resources		
Impact BIO-1. Construction and operation of the project would not directly impact foraging special-status birds or raptors. Construction could indirectly impact the nesting State-protected Belding's savannah sparrow, if present within the nearby pickleweed habitat in San Jose Creek and Old San Jose Creek. Construction noise and vegetation clearing have the potential to directly and indirectly impact nesting birds protected under the Migratory Bird Treaty Act, if present. Impacts on nesting birds, including sensitive species, are Class II, less than significant with mitigation incorporated.	**BIO-1: Nesting Birds and Raptors** To avoid construction impacts to nesting birds and raptors, the construction contractor shall conduct vegetation removal and initial ground disturbance outside the bird and raptor breeding season, which is typically February 1 through September 1 but can vary based on local and annual climatic conditions. If construction begins within the breeding season, then not more than seven days before demolition, ground disturbance, and/or vegetation removal commences, a bird and raptor preconstruction survey shall be conducted by a City-approved biologist (retained by the Applicant/Permittee) within the disturbance footprint, plus a 300-foot buffer. The survey shall be conducted by a biologist familiar with the identification of bird species known to occur in southern California. The City-approved biologist shall conduct the preconstruction nesting bird and raptor surveys during the time of day when bird species are active and for a sufficient duration to reliably conclude presence/absence of nesting birds and raptors within the 300-foot buffer. The City-approved biologist shall submit a summary of the nesting bird and raptor survey results to the Planning and Environmental Review Director, or designee. Survey conclusions shall be reviewed and approved by the Planning and Environmental Review Director, or designee, prior to initiation of construction. If no bird nests are observed no further mitigation is required. If an active nest of species protected by the California Fish and Game Code (§ 3503) or Migratory Bird Treaty Act are found within 300 feet of the disturbance footprint, the City-approved biologist shall flag their locations and map their locations on an aerial photograph of the	Impacts would be less than significant with mitigation incorporated.

Impact	Mitigation Measure (s)	Residual Impact
	disturbance footprint at a scale no less than 1"=200' and/or recorded with the use of a Global Positioning System (GPS) unit. If active raptor nests are detected, the map shall include topographic lines, parcel boundaries, adjacent roads, known historical nests for protected nesting species, and known roosting or foraging areas, as required by Conservation Element Policy 8.3 of the Goleta Community Plan/Coastal Land Use Plan. The buffer shall be 300 feet in compliance with Conservation Element Policy 8.4 of the Goleta General Plan/Coastal Land Use Plan. If the 300-foot buffer is infeasible, the City-approved biologist may reduce the buffer distance as appropriate, dependent upon the species and the proposed work activities. If any active non-raptor bird nests are found, the City-approved biologist shall establish a suitable buffer area (varying from 25 to 300 feet), depending on the species. The construction contractor shall ensure that no ground disturbance occurs within the buffer until the City-approved biologist confirms that the breeding/nesting is completed and all the young have fledged and removes the buffer. If work within the buffer is necessary, a City-contracted biological monitor (funded by the Applicant/Permittee) shall monitor the active nest full-time during construction activities within the buffer to ensure project activities are not indirectly impacting protected nesting birds and raptors. If work ceases for more than 30 days, a new nesting bird survey shall be conducted in accordance with this measure. **Plan Requirements and Timing:** The survey shall be conducted no more than seven (7) days prior to commencement of any demolition, grading, and/or vegetation removal activities. Survey conclusions shall be reviewed and approved by the Planning and Environmental Review Director, or designee, prior to the commencement of construction activities that could disturb suitable nesting habitat, such as demolition, grading, and/or vegetation removal. This measure, and any buffer requirements, shall be incorporated into the grading plans. **Monitoring**: The Planning and Environmental Review Director, or designee, shall review any biological survey reports and conduct periodic site inspections to verify compliance with survey recommendations in the field. **BIO-2: Belding's Savannah Sparrow Avoidance** To avoid indirect impacts to nesting habitat for the Belding's savannah sparrow (*Passerculus sandwichensis beldingi* (BSS), the construction contractor shall schedule noise and vibration-generating construction (excavation) within 250 feet of suitable salt marsh (pickleweed) habitat within San Jose Creek and Old San Jose Creek to avoid the BSS breeding season. If avoidance during the BSS nesting season (March 15 through July 15) is infeasible, not more than 1 week before initiation of excavation a City-approved biologist (retained by the Applicant/Permittee) with experience identifying and observing BSS shall conduct BSS surveys in suitable habitat with 250 feet of construction to ensure that nests or individuals are not present in the work area or 250-foot buffer. The City-approved biologist shall conduct two morning surveys (1/2 hour before sunrise to 10:00 am) in saltmarsh habitat within 250 feet of the development footprint determine the presence of Belding's savannah sparrows in these areas. A recording of this species may not be used to detect the species unless the City-approved biologist has a Memorandum of Understanding issued by CDFW. The City-approved biologist shall note the type of bird activity observed and behavior such as defending territory, singing for a mate, scolding intruders, perching together, nest building, feeding young, and aerial chasing. If no BSS are observed within the 250-foot buffer excavation may commence. The City-approved biologist shall then continue weekly surveys during all project activities to monitor for the presence of the BSS from March 15 through July 15. If an active BSS nest is observed within 250 feet of the development area, the construction contractor shall cease project activities within 250 feet of the nest, and the City-approved biologist shall contact the California Department of Fish and Wildlife (CDFW) and the City's Planning and Environmental Review Director within 48 hours. No project activities shall occur in in the 250-foot buffer until any young birds have fledged and left the area. Verification that the construction schedule, surveys, and monitoring are being implemented shall be sent to the CDFW and the City. The City-approved biologist shall document observations of BSS on California Natural Diversity Database forms and submitted to the CDFW upon project completion. **Plan Requirements and Timing:** Not more than 3 days before ground disturbance if ground disturbances commences between March 15 through July 15, including exporting or importing of soil, within 250 feet of salt marsh vegetation, the Planning and Environmental Review Director, or designee, shall verify that construction and grading occurs outside the nesting season, or that BSS nest surveys have been conducted, and buffer requirements specified above are in place (if applicable). This measure, and any buffer requirements, shall be incorporated into the grading plans. A 250-foot buffer from salt marsh habitat shall be depicted on the grading plans. **Monitoring:** The Planning and Environmental Review Director, or designee, shall verify compliance not more than 1 week before ground disturbances within 250 feet of salt marsh vegetation if commencing between March 15 through July 15. Planning and Environmental Review Director, or designee, shall conduct periodic site inspections to ensure compliance throughout the construction period.	

Impact	Mitigation Measure (s)	Residual Impact
Impact BIO-2. Construction of the proposed outfall within San Jose Creek could result in temporary noise and water quality impacts to tidewater gobies and steelhead. A cofferdam would be installed during work within San Jose Creek to prevent aquatic species from entering the work area. Construction impacts to aquatic species would be Class II, less than significant with mitigation incorporated.	In addition to the below measure, Mitigation Measure NOI-1 would be required. **BIO-3: Tidewater Goby and Southern California Steelhead Habitat Protection** To avoid and minimize impacts to jurisdictional aquatic resources, tidewater goby critical habitat, and Southern California steelhead critical habitat the Applicant/Permittee must: A. Develop and receive approval from the Planning and Environmental Review Director or designee of a Toxic Materials Control and Spill Response Plan for materials that may be used/stored on-site, such as petroleum-based products, fuel and lubricants, and other potentially toxic materials prior to the issuance of the Zoning Clearance for grading or construction activities whichever is permitted first. The plan shall specify that cleaning and refueling of equipment and vehicles during construction shall occur only within designated staging areas that are at least 100 feet from San Jose Creek and Old San Jose Creek. The Toxic Material Control and Spill Response Plan must be implemented by the contractor if needed throughout the construction period. B. Provide the City Planning & Environmental Review Department Director or designee with copies of permits and/or waivers or similar from the USACE (including NMFS and USFWS Section 7), RWQCB, and CDFW for storm drain outlet work prior to the issuance of the Zoning Clearance grading permit. C. Schedule the storm drain outlet work on San Jose Creek to occur during the dry season (June 1 to October 15) when surface water flows are low and during low tides when no surface water is present in the staging area. It shall also be scheduled to avoid peak high tides. No concrete or any cement products shall be used within 150 feet of San Jose Creek during the rainy season, or when there is a 25 percent or greater chance of 0.10 inches of rain within 10 days of a scheduled cement pour. The cofferdam installed in the creek bed staging area shall be removed 10-15 days after the concrete has been poured on the creek bank at the detention basin outfall location to allow time for the concrete to cure before coming into contact with tidal surface water. **Plan Requirements and Timing**: These requirements and prohibitions shall be included and the cleaning and refueling area depicted on all construction plans submitted for grading or building permit issuance. The Toxic Materials Control and Spill Response Plan must be approved by the Planning and Environmental Review Director, or designee, prior to grading or building Zoning Clearance permit issuance. ESHA fencing shall be erected prior to construction. **Monitoring:** The Planning and Environmental Review Director, or designee, shall verify compliance prior to grading or building permit Zoning Clearance issuance and shall conduct periodic site inspections to verify compliance in the field. All costs associated with the development of the Toxic Material Control and Spill Response Plan, City review, and ongoing implementation including any peer reviews determined necessary by the City are borne by the Applicant/Permittee.	Impacts would be less than significant with mitigation incorporated.
Impact BIO-3. Construction of the project could result in displacement or mortality to migrating California red-legged frogs and western pond turtle, if present, during favorable conditions for dispersal. Direct and indirect construction Impacts to semi-aquatic species would be Class II, less than significant with mitigation incorporated.	**BIO-4: Preconstruction Semi-Aquatic Species Survey** Prior to the start of construction activities for the proposed outfall to San Jose Creek, a City-approved biologist (retained by the Applicant/Permittee) shall conduct a preconstruction survey for semi-aquatic species (e.g., California Red-legged Frog, western pond turtle) of the development area and within a 100-foot buffer from San Jose Creek. The survey shall be completed within seven days in dry conditions or within 48 hours in favorable conditions for upland amphibian migration (e.g., during or immediately after heavy rain events, heavy fog, or high humidity). The survey shall include the development area within a 100-foot buffer from San Jose Creek and Old San Jose Creek, and the buffer emphasizing native vegetation, as these areas are more likely to harbor special-status wildlife than cleared areas. The City-approved biologist shall submit a summary of the survey results to the Planning and Environmental Review Director, or designee, for review and approval prior to initiation of ground disturbance for the proposed outfall. If a special status species is identified during construction, the construction contractor shall halt construction activities and contact the biologist. If identified during pre-construction surveys, individual special-status species in the work area shall be allowed to move out of the work area of their own volition. If special-status species are detected and do not move out of the work area, a Species Relocation and Exclusion Plan shall be prepared by the City-approved biologist and submitted to the Planning and Environmental Review Director, or designee, for approval prior to relocation. The Species Relocation and Exclusion Plan shall specify that if relocation by humans is required, the animal shall be captured by a City-approved biologist and relocated out of harm's way to the nearest suitable habitat, a minimum of 100 feet from the maintenance project work area where it was found. Species listed as threatened or endangered (e.g., California Red-legged Frog) shall only be handled as authorized by United States Fish and Wildlife Service. The City-approved biologist shall document observations of special-status species on California Natural Diversity Database forms and submit the documentation to the California Department of Fish and Wildlife upon project completion. If one or more special status semi-aquatic species are detected, surveys are required each day prior to outfall construction activities. Construction of the outfall can commence when the semi-aquatic species moves or is relocated out of the work area and when approved by the City-approved biologist. If construction of the outfall ceases for more than 30 days, a special status survey is required. **Plan Requirements and Timing:** Prior to the initiation of ground disturbance for the proposed outfall, a summary of the survey results shall be transmitted via email to Planning and Environmental Review Director, or designee. If no special-status species are found, grading activities can commence and no further reporting is required.	Impacts would be less than significant with mitigation incorporated.

Impact	Mitigation Measure (s)	Residual Impact
	If species are detected and do not move out of the work area, a Species Relocation and Exclusion Plan shall be prepared by the City-approved biologist and submitted to the Planning and Environmental Review Director, or designee, for approval prior to relocation and commencing outfall construction. A new survey is required prior to construction. If species are detected a Survey Report shall be submitted to the Planning and Environmental Review Director, or designee within 14 days of the survey and any relocation. **Monitoring:** The Planning and Environmental Review Director, or designee, shall review any biological survey, relocation, or exclusion reports in consultation with any resource/trustee agency as needed. The Planning and Environmental Review Director, or designee, shall conduct periodic site inspections to verify compliance with survey recommendations in the field. All costs associated with the development of the Species Relocation and Exclusion Plan, City review, and ongoing implementation including any peer reviews determined necessary by the City are borne by the Applicant/Permittee. **BIO-5: Biological Monitor and Worker Education** A City-contracted biological monitor (funded by the Applicant/Permittee) familiar with special-status plant and wildlife species with the potential to occur in the project work area shall be present during all work within 100 feet of San Jose Creek and Old San Jose Creek during construction activities to ensure compliance with all mitigation measures. The monitor shall be responsible for the following: A. Ensuring that procedures for verifying compliance with biological resource mitigation measures are followed. B. Lines of communication and reporting methods. C. Daily and weekly reporting of compliance. D. Construction crew Worker Environmental Awareness Training Program (WEAP) training. E. Authority to stop non-emergency work. F. Action to be taken in the event of non-compliance. G. Conducting daily wildlife sweeps prior to construction. The biological monitor shall also conduct a Worker Environmental Awareness Training Program for construction personnel prior to the commencement of construction activities and new personnel or crews after construction is initiated. As needed, training shall be conducted in Spanish for Spanish language speakers. **Plan Requirements and Timing.** This measure shall be incorporated into the grading plans and the WEAP will be available on-site during construction. The City-approved biological monitor shall submit a monitoring summary to the Planning and Environmental Review Director, or designee, within 14 days of each phase of construction such as rough grading, precise grading, storm drain outlet, vertical construction, and project completion. **Monitoring**: Monitoring summaries shall be kept on file with the City for the duration of construction.	
Impact BIO-4. Construction of the proposed project could impact foraging/transient special-status insects and bats. Individual insects would be expected to escape direct impacts. Special-status bats would be expected to be present on-site only at night, outside construction hours. Construction and operational impacts to special-status bat and insect species would be Class III, less than significant.	None required.	Less than significant.
Impact BIO-5. Construction and operation of the project could result in Indirect impacts to sensitive communities or Environmentally Sensitive Habitat Areas from construction dust, stormwater and the introduction of invasive species. Impacts would be Class II, less than significant with mitigation incorporated.	In addition to the below measures, Mitigation Measures BIO-3 and BIO-5 would be required. **BIO-6: Landscaping: Invasive Species** Non-native, invasive plant species shall not be included in landscaping plans associated with the project. The California Invasive Plant Inventory Database contains a list of non-native, invasive plants (Cal-IPC 2023, or its successor). The Applicant/Permittee's landscape plan and, if required the Habitat Restoration Plan for the SPA buffer area, shall reflect the use of non-native invasive plants and be approved by the Design Review Board prior to the issuance of the Zoning Clearance permit for the building construction. Further, prior to issuance certificate of occupancy, the Planning and Environmental Review Director, or designee, shall inspect landscape planting features and habitat restoration areas (if required) to ensure that they have been installed consistent with approved plans. **Plan Requirements and Timing**: The Landscaping and Habitat Restoration Plan shall be approved by the Design Review Board prior to issuance of grading or building Zoning Clearance, whichever occurs first. **Monitoring**: The Planning and Environmental Review Director, or designee, shall verify compliance before Zoning Clearance for grading or building issuance. Prior to issuance certificate of occupancy, the Planning and Environmental Review Director, or designee, shall inspect landscape planting features to ensure that they have been installed consistent with approved plans. **BIO-7: Invasive Species Control Plan** The City-approved biologist (retained by the Applicant/Permittee) shall prepare an Invasive Species Control Plan for all construction equipment and activities within 100 feet of San Jose Creek. The Invasive Species Control Plan, which shall be implemented by the construction contractor(s), shall also include, but not be limited to, the following measures to prevent the introduction of invasive weed species:	Impacts would be less than significant with mitigation incorporated.

Impact	Mitigation Measure (s)	Residual Impact
	A. imported fill material shall be obtained from a source that is known not to be infested with invasive plant species. B. Stockpile topsoil shall be redeposited after construction or transported to a permitted landfill for disposal in order to minimize colonization of disturbed areas and spread of invasive species. C. All erosion control materials, including straw bales, straw wattles, or mulch used on-site shall be free of invasive species seed. D. Exotic and invasive plant species shall be excluded from any erosion control seed mixes and/or landscaping plant palettes associated with the proposed project. E. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. **Plan Requirements and Timing**: The Invasive Species Control Plan shall be approved by the Planning and Environmental Review Director, or designee, prior to issuance of the Zoning Clearance for grading or building permits, whichever occurs first. **Monitoring**: The Planning and Environmental Review Director, or designee, shall verify compliance before Zoning Clearance for grading or building issuance. During construction, the Planning and Environmental Review Director, or designee, shall verify compliance with the Invasive Species Control Plan. All costs associated with the development of the Invasive Species control Plan, City review, and ongoing implementation including any peer reviews determined necessary by the City are borne by the Applicant/Permittee.	
Impact BIO-6. Construction of the proposed outfall and temporary cofferdam in San Jose Creek would temporarily impact 588 square feet of state and locally regulated streambed, including 497 square feet of federal unvegetated tidal waters and 416 square feet of a state Marine Protected Area. The cofferdam would prevent indirect impacts from water quality degradation but would also introduce fill and interrupt the tidal hydrology. Indirect construction impacts could occur if work occurs outside the development area. Direct and indirect construction impacts on waters and wetlands from would be Class II, less than significant with mitigation incorporated.	In addition to the below measure, Mitigation Measures BIO-3, BIO-5, BIO-6, and BIO-7 would be required. **BIO-8: Environmentally Sensitive Habitat Fencing and Protection** A. The City-contracted biological monitor (funded by the Applicant/Permittee) shall identify sensitive biological resources to be avoided. Prior to construction mobilization, the Applicant/Permittee must install temporary construction fencing and signage (as appropriate) around the ESHA within 100 feet of development under the direction of the biological monitor to avoid impacts to the sensitive habitat throughout the duration of construction. The fencing shall serve as a visual boundary for construction personnel. In addition, a survey shall be conducted out to property corners and verification shall be submitted to the Planning and Environmental Review Director confirming that the fence has been placed in the correct location prior to the issuance of any grading or building permits, whichever occurs first. B. At the conclusion of project construction, a post-construction biological survey shall be conducted by the City-approved biologist within seven days of project completion, to document if any inadvertent impacts to ESHA have occurred. If work occurred outside the development area and ESHA is inadvertently removed or damaged, a Habitat Mitigation Plan shall be prepared by the City approved biologist consistent with the General Plan Conservation Element and shall specify acres impacted and restored, timing, plant palette, and monitoring. The Habitat Mitigation Plan shall require a replacement ratio of 1:1 for temporary impacts and a minimum of a 3:1 ratio for permanent impacts and shall require the establishment of native percent cover that reflects that of an unimpacted adjacent ESHA reference site. If required, the Habitat Mitigation Plan shall be approved by the Planning and Environmental Review Director, or designee within 30 days of any inadvertent damage. **Plan Requirements and Timing**: Temporary fencing shall be erected prior to construction and removed upon project completion. Project completion reports shall be submitted to the Planning and Environmental Review Director, or designee, within 30 days of project completion. If required, a Habitat Mitigation Plan shall be prepared by a City approved biologist and approved by the Planning and Environmental Review Director, or designee within 30 days of any inadvertent damage. **Monitoring**: The biological monitor shall ensure fencing is in place and ensure sensitive habitat avoidance for the duration of construction in the affected area. Planning and Environmental Review Director, or designee, staff shall verify compliance prior to construction and shall verify compliance in the field during all construction activities.	Impacts would be less than significant with mitigation incorporated.

Impact	Mitigation Measure (s)	Residual Impact
Impact BIO-7. Construction noise could affect avian behavior in Old San Jose Creek and aquatic species movement in San Jose Creek. The use of chemicals during project operations could harm wildlife and degrade aquatic habitat. Direct and indirect operation and construction impacts on wildlife movement corridors would be Class II, less than significant with mitigation incorporated.	In addition to the below measure, Mitigation Measures BIO-1, BIO-6, BIO-7, and NOI-1 would be required. **BIO-9: Landscape Chemical and Pest Management Plan** Prior to issuance of a Zoning Clearance for the building construction, the Applicant/Permittee shall submit a Landscape Chemical and Pest Management Plan to the Planning and Environmental Review, or designee, for review and approval. The Landscape Chemical and Pest Management Plan shall specify a prohibition of the use of pesticides, herbicides, fertilizers, and rodenticides unless approved by the Planning and Environmental Review Director (e.g., organic pesticides in emergency circumstances). All pesticides, herbicides, fertilizers, and rodenticides used at the project site shall be those designated for use near aquatic and wetland habitats and are prohibited within 100 feet of San Jose and Old San Jose Creeks. Chemicals shall be applied with techniques that avoid over-spraying and control application to avoid excessive concentrations. Integrated Pest Management principles shall be implemented to the extent practicable for chemical pesticides, herbicides, and fertilizers. The Landscape Chemical and Pest Management Plan shall include measures alternative weed control measures (e.g., removal by hand), pest management and extermination; proper application techniques; identify the fertilizers, rodenticides, pesticides, or herbicides proposed to be used; location and storage requirements; and map area used. The use of second-generation anticoagulant rodenticides shall be prohibited during construction and for the life of the permit. Any use of fertilizers, pesticide, herbicide, or rodenticide products shall be consistent with federal and state requirements. Trash and recycling receptacles shall be wildlife proof. **Plan Requirements and Timing:** A Landscape Chemical and Pest Management Plan shall be developed by the Applicant/Permittee and approved by the Planning and Environmental Review Director, or designee, prior issuance of Zoning Clearance for the building permit. . The requirements shall be printed on the final approved landscape plans, each lease document, and recorded on the property deed. The Landscape Chemical and Pest Management Plan shall provide a prohibition on use of pesticides, herbicides, fertilizers, and rodenticides unless approved by the Planning and Environmental Review Director (e.g., organic pesticides in emergency circumstances). These prohibitions shall be the subject of at least one annual communication by the Applicant/Permittee to the tenants and management company in the form of a meeting and/or newsletter or electronic update that is distributed to tenants. **Monitoring:** Planning and Environmental Review Director, or designee, shall review and approve the Landscape Chemical and Pest Management Plan prior to the issuance of the Zoning Clearance. The Applicant/Permittee is responsible for the ongoing use of said plan and shall also provide the Planning and Environmental Review Director with an annual monitoring report by January 1 of each year after issuance of the certificate of occupancy demonstrating the use of aquatic and wetland habitat appropriate fertilizer, herbicides, and pesticides consistent with the Landscape Chemical and Pest Management Plan on the property for the life of the on-site development. All costs associated with the development of the Landscape Chemical and Pest Management Plan, City review, and ongoing implementation including any peer reviews determine necessary by the City are borne by the Applicant/Permittee.	Impacts would be less than significant with mitigation incorporated.
Impact BIO-8. Construction and operation of the project would be inconsistent with General Plan Conservation Element Policy 2.2, which requires a 100-foot buffer from the San Jose Creek Streamside Protection Area. Additionally, the project would preclude streamside protected area restoration under General Plan Conservation Element Policy 2.6. This impact would be Class I, significant and unavoidable.	There is no feasible mitigation that would reduce the impact level to less than significant.	Impacts would remain significant and unavoidable.
Impact BIO-9. Construction and operation of the project would be consistent with General Plan Conservation Element Policies 2, 3, 5, 6, and 8. This impact would be Class II, less than significant with mitigation incorporated.	Mitigation Measures BIO-1 through BIO-9 would be required.	Impacts would be less than significant with mitigation incorporated.
Impact BIO-10. The project site is not located within an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. No impact would occur.	None required.	No impact.
Cumulative Impacts. Cumulative biological resources impacts would be less than significant, and the project's contribution would not be cumulatively considerable.	None required beyond project-level mitigation measures.	Not cumulatively considerable.
Cultural Resources		
Impact CUL-1. No historic resources were identified on the project site. The project would have no impact on historic resources.	None required.	No impact.
Impact CUL-2. Construction of the project would involve ground disturbing activities such as grading and surface excavation. However, there is no potential for archaeological cultural resources to exist within the project site. This impact would be Class III, less than significant.	None required.	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
Impact CUL-3. Construction of the project would involve ground disturbing activities such as grading and surface excavation, which have the potential to unearth or adversely impact previously unidentified human remains. This impact would be Class III, less than significant.	None required.	Less than significant.
Cumulative Impacts. The project would not have a cumulatively considerable contribution to cumulative cultural resources impacts.	None required.	Less than significant.
Energy		
Impact E-1. The proposed project would utilize gasoline, diesel, and electricity, but would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. This impact would be Class III, less than significant.	None required.	Less than significant.
Impact E-2. The proposed project would consume energy, but energy consumption would not conflict with Senate Bill 100, the City's Climate Action Plan, Strategic Energy Plan, or General Plan/Coastal Land Use Plan. This impact would be class III, less than significant.	None required.	Less than significant.
Cumulative Impacts. Cumulative energy impacts would be less than significant, and the project's contribution would not be cumulatively considerable.	None required.	Not cumulatively considerable.
Geology and Soils		
Impact GEO-1. No faults are located on the project site. The project would have no impact.	None required.	No impact.
Impact GEO-2. The project site is located in a seismically active area and seismic activity in the project site's regional area could affect the project site. Implementation of Mitigation Measure GEO-1 would require incorporation of seismic design recommendations from the project's geotechnical report and California Building Code requirements into the project's structural design, which would reduce impacts involving rupture of a known earthquake fault or seismic ground shaking to Class II, less than significant with mitigation incorporated.	**GEO-1: Geotechnical Design Considerations** The project design engineer shall incorporate the recommendations listed below from the *Revised Geotechnical Engineering Report Update* (Appendix G) into the project's grading and building plans. The applicant shall submit the grading and building plans to the Planning and Environmental Review Director or designee for review and approval prior to issuance of grading and building permits for the project. **Grading** 1. Following site preparation, the soil within the building and improvement areas shall be removed to a level plane to a minimum depth of 2 feet below ground surface (bgs). During construction, locally deeper removals may be recommended based on field conditions. The resulting soil surface shall then be scarified, moisture conditioned, and compacted prior to placing any fill soil. 2. Following site preparation, the soils in fill areas beyond the building and surface improvement areas shall be removed to a minimum depth of 2 feet bgs. During construction, locally deeper removals may be recommended based on field conditions. The resulting soil surface shall then be scarified, moisture conditioned, and compacted prior to placing any fill soil. 3. Voids created by dislodging cobbles and/or debris during scarification shall be backfilled and compacted, and the dislodged materials shall be removed from the area of work. 4. On-site material and approved import materials may be used as general fill and up to 4 feet below the deepest mat foundation element within the building area of the building. All imported soil shall be non-expansive. Proposed imported soils shall be evaluated by the geotechnical engineer before being used, and on an intermittent basis during placement on the site. 5. All materials used as fill shall be cleaned of any debris and rocks larger than 6 inches in diameter. No rocks larger than 3 inches in diameter shall be used within the upper 3 feet of finish grade. When fill material includes rocks, the rocks shall be placed in a sufficient soil matrix to ensure that voids caused by nesting of the rocks will not occur and that the fill can be properly compacted. 6. Under the mat foundation for the building, Tensar IX 160 triaxial geogrid or an approved equivalent shall be placed on a level plane 4 feet below the bottom of the deepest foundation element within the building area. The geogrid shall also extend vertically up the 4-foot sides of the excavation. Two feet of moisture conditioned and compacted Class 2 AB (Caltrans, 2018) shall then be placed to a level plane on top of the first geogrid within the building area. Another or second layer of Tensar TX 160 triaxial geogrid or an approved equivalent shall be placed on the top of the first layer of AB within the building area; however, it does not need to extend up the sides of the excavation. Another 2 feet of moisture conditioned and compacted AB shall then be placed to a level plane on the geogrid within the building area. The bottom layer of geogrid that was extended up the sides of the excavation shall then be folded down on top of the second layer of compacted AB such that it creates a minimum 5-foot overlap on top of the compacted AB surface. Previously excavated soil or Class 2 AB may then be placed as moisture conditioned and compacted fill back up to pad grade. The geogrid shall be placed and overlapped as recommended by the manufacturer. 7. Fill slopes shall be keyed and benched into competent soil as generally shown on the Typical Bench and Keyway Detail presented in Appendix E. The geotechnical engineer shall approve all keyways and benches. The keyway shall be a minimum of 10 feet wide. 8. Slopes under normal conditions shall be constructed at 2 to 1 (horizontal to vertical) or flatter inclinations. Slopes subject to inundation shall be constructed at 3 to 1or flatter inclinations.	Impacts would be less than significant with mitigation incorporated.

Impact	Mitigation Measure (s)	Residual Impact
	Foundations (General) 1. The allowable bearing capacity and/or modulus of subgrade reaction may be increased by one-third when transient loads, such as wind or seismicity, are included if the structural engineer determines they are allowed. The foundations shall be designed using the seismic information presented in the "Seismic Design Parameters" listed in the "Ground Motion Analyses" section of this report. 2. Foundation excavations shall be observed by the geotechnical engineer prior to rebar and PCC placement. Footing excavations shall be thoroughly moistened prior to PCC placement and no desiccation cracks shall be present. 3. The Corrosion Evaluation Report prepared by CERCO Analytical, Inc. and presented in Subappendix C of the *Revised Geotechnical Engineering Report Update* shall be used by the architect/engineer in specifying appropriate corrosion protection measures for all foundation elements. **Drainage** 1. Unpaved ground surfaces shall be finish graded to direct surface runoff away from foundations and other improvements at a minimum 5 percent grade for a minimum distance of 10 feet. The site shall be similarly sloped to drain away from foundation, slopes, and other improvements during construction. Where this is not practicable due to property lines, other improvements, etc., swales with improved surfaces, area drains, or other drainage facilities, shall be used to collect and discharge runoff. 2. To reduce the potential for planter drainage from gaining access to subslab areas, any raised planter boxes adjacent to foundations shall be installed with drains and sealed sides and bottoms. Drains shall also be provided for areas adjacent to the foundations that would not otherwise freely drain. 3. The building roof shall be fitted with roof gutters. Runoff from flatwork, roof gutters, downspouts, planter drains, area drains, etc. shall discharge in a nonerosive manner away from foundations and other improvements in accordance with the requirements of the governing agencies. 4. The on-site soils are highly erodible; stabilization of soils disturbed during construction by vegetation or other means during and following construction is essential to reduce erosion damage. Care shall be taken to establish and maintain vegetation. The landscaping shall be planned and installed to maintain the surface drainage recommended above. Surface drainage shall also be maintained during construction. 5. To reduce migration of surface drainage into the subgrade, maintenance of pavement areas is critical. Any cracks that develop in the pavement shall be promptly sealed. 6. The owner or site maintenance personnel shall periodically observe the areas within and around the site for indications of rodent activity and soil instability. The owner or site maintenance personnel shall also implement an aggressive program for controlling the rodent activity in the general area. **Plan Requirements and Timing.** Grading and building plans shall be submitted for review and approval by the Planning and Environmental Review Director or designee before the City issues grading and building permits. **Monitoring.** The project soils engineer shall observe all excavations before placement of fill and report observations to the City. The City will conduct field inspections as needed.	
Impact GEO-3. The *Revised Geotechnical Engineering Report Update* determined that liquefaction and subsidence may damage future development on the project site. The project site is not at risk of landslide, lateral spreading, or collapse. Implementation of Mitigation Measure GEO-1 would require incorporation of grading and building foundation recommendations into the project design, which would reduce this impact to Class II, less than significant with mitigation incorporated.	Mitigation Measure GEO-1 would be required.	Impacts would be less than significant with mitigation incorporated.
Impact GEO-4. The project would not cause the risk of loss, injury, or death involving landslides as the project site is not located in a potential landslide area. The project would have no impact.	None required.	No impact.
Impact GEO-5. Soils on the project site are highly erodible, and on-site development may increase soil erosion during and after construction activities. Implementation of Mitigation Measure GEO-1 would incorporate grading and drainage recommendations into project design, which would reduce this impact to Class II, less than significant with mitigation incorporated.	Mitigation Measure GEO-1 would be required.	Impacts would be less than significant with mitigation incorporated.
Impact GEO-6. Project site soils are non-expansive. The project would have no impact.	None required.	No impact.
Impact GEO-7. The project would not require the use of septic tanks or alternative wastewater disposal systems. The project would have no impact.	None required.	No impact.

Impact	Mitigation Measure (s)	Residual Impact
Impact GEO-8. Project grading would occasionally extend beyond fill soils that underlie the project site. However, the geologic unit that underlies the project site has a low paleontological sensitivity. Therefore, the project would have a low potential to disturb paleontological resources, and this impact would be Class III, less than significant.	None required.	Less than significant.
Cumulative Impacts. Cumulative geology and soils impacts would be less than significant, and the project's contribution would not be cumulatively considerable.	None required beyond project-level mitigation measures.	Not cumulatively considerable.
Greenhouse Gases		
Impact GHG-1. The proposed project would not generate temporary and long-term increases in greenhouse gas emissions that would exceed the County's 2030 CAP nonresidential per employee GHG threshold of 2.63 metric tons of carbon dioxide equivalent per year. This impact would be Class III, less than significant..	None required.	Less than significant.
Impact GHG-2. The proposed Project would be consistent with the California Air Resources Board 2022 Scoping Plan, Santa Barbara County Association of Governments 2050 Regional Transportation Plan/Sustainable Communities Strategy, City of Goleta General Plan/Coastal Land Use Plan, and City of Goleta Climate Action Plan, which aim at reducing greenhouse gas emissions. This impact would be Class III, less than significant.	None required.	Less than significant.
Cumulative Impacts. The project would not exceed the County of Santat Barbara greenhouse gas thresholds, nor conflict with greenhouse gas reduction plans. Therefore, the project would not have a cumulatively considerable contribution to cumulative greenhouse gas impacts.	None required.	Not cumulatively considerable.
Hazards and Hazardous Materials		
Impact HAZ-1. Project construction would involve minimal routine transport, use, and disposal of hazardous materials. Project operation would consist of an industrial warehouse building and could involve minimal routine transport, use, or disposal of hazardous materials. however, all hazardous materials would be transported, handled, and disposed of in compliance with existing federal, State, and local regulations. Project impacts would be Class III, less than significant.	None required.	Less than significant.
Impact HAZ-2. Project construction could result in the accidental release of hazardous materials through demolition of existing structures or disturbance of project site soils. however, implementation of Mitigation Measures HAZ-1 through HAZ-5 would reduce impacts to Class II, less than significant with mitigation incorporated.	**HAZ-1: Asbestos Containing Materials Abatement** Prior to the issuance of Zoning Clearance associated with the demolition permit, the project applicant/Permittee shall prepare an asbestos abatement plan addressing the items/topics listed below. The asbestos abatement plan shall be reviewed and approved by the Planning and Environmental Review Director or designee. During project construction and demolition activities, the project applicant shall follow the measures outlined in the asbestos abatement plan and shall be undertaken by properly trained and licensed asbestos contractors currently registered with Cal/OSHA and/or OSHA (herein referred to as "abatement contractors"). Abatement contractors shall be selected and vetted by the project applicant, and reviewed by the Director of Planning and Environmental Review or Designee. Project-specific requirements to be addressed in the asbestos abatement plan include the following: Disturbance activities shall be performed only by abatement contractors using appropriate controls to prevent fiber emissions during the removal process. This may include, but is not limited to, the use of wet methods (water mist), negative pressure containment, high efficiency particulate air (HEPA) filtration, and other engineering controls, as deemed appropriate, to keep fibers from being dispersed in accordance with current federal, State, and local regulations. Presumed asbestos containing roofing materials shall be sampled by abatement contractors prior to demolition to determine proper handling and disposal requirements. Windows with trace (defined as less than 1 percent) asbestos in putty shall be removed intact to avoid disturbance of the putty, if possible. Other materials with trace asbestos shall be point counted to determine the asbestos concentrations; if asbestos concentrations are not determined, these materials shall be managed as ACMs. Workers performing removal shall be properly protected to prevent exposure, including the use of respiratory protection with HEPA filtration, protective suits, or other protective equipment deemed necessary by abatement contractors. Disturbance of greater than 100 square feet of any ACMs or asbestos-containing construction materials (ACCMs) must be performed by trained and licensed abatement contractors. Asbestos containing waste materials must be properly contained and transported for off-site disposal at a permitted landfill or disposal facility. Friable asbestos with greater than 1 percent asbestos content is considered hazardous waste per current federal and State regulations and must be transported and disposed using proper manifest documentation. Non-friable asbestos is categorized as non-hazardous, asbestos containing waste and can typically be disposed to the local Class III landfill with prior approval from landfill operators. As noted, materials with less than 1 percent total asbestos can be disposed of as construction debris if proper lab analysis is provided. The abatement contractor shall be responsible for complying with local, State, and federal standards for worker protection and National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations regarding asbestos fiber emissions. Proper removal techniques must be	Impacts would be less than significant with mitigation incorporated.

Impact	Mitigation Measure (s)	Residual Impact
	followed to prevent the dissemination of asbestos fibers. All required notification and permitting shall be administered by the abatement contractor, and proper completion shall be verified by the City's Director of Planning and Environmental Review. There is the potential suspect materials previously unidentified could be discovered during site renovation/demolition work. This could include suspect materials located inside walls, under floors, above ceilings, and in other areas. If suspect materials are found during site work, the area shall be isolated, and any suspect materials tested to confirm or deny the presence of asbestos, lead, or other hazards, as determined appropriate by the abatement contractor. **Plan Requirements and Timing.** The project applicant shall prepare the asbestos abatement plan and contract with an abatement contractor prior to the issuance of the Zoning Clearance associated with the demolition permit. **Monitoring.** The Director of Planning and Environmental Review or Designee shall approve the asbestos abatement plan prior to the issuance of Zoning Clearance and then spot-check during demolition activities and verify compliance documentation following the project's demolition activities. **HAZ-2: Lead-Based Paint Abatement** Prior to the issuance of a Zoning Clearance associated with the demolition permit, the project applicant/Permittee shall prepare a lead based paint abatement plan. This plan can be combined with the plan required in Mitigation Measure HAZ-1. The lead based paint plan shall be reviewed and approved by the Planning and Environmental Review Director or designee. During project construction and demolition activities, the project applicant shall follow the measures outlined in the lead based paint abatement plan. specific requirements related to lead-based paint. These requirements shall be undertaken by properly trained contractors that utilize lead-safe work practices (or "abatement contractors"). Abatement contractors shall be selected and vetted by the project applicant and reviewed by the City of Goleta. Project-specific requirements of the plan include the following: Any disturbance by abatement contractors that might generate dust or create a lead exposure hazard shall be performed by lead-trained workers using lead-safe work practices. Lead safe work practices include appropriate containment, wet methods, and use of hand tools or similar methods that will minimize the generation of airborne dust emissions and potential lead hazards. To prevent lead exposure hazard due to the generation of lead dust and debris, lead painted components (e.g., windows, doors, baseboards) or similar lead containing items shall be removed intact and segregated from the overall waste stream by abatement contractors. Lead containing waste shall be properly disposed of by abatement contractors in accordance with local, State, and federal regulations. Lead containing waste is classified as Hazardous Waste if total lead concentration exceeds 1,000 milligrams per kilogram (or parts per million) or if soluble lead concentration exceeds 5.0 milligrams per liter. Proper waste characterization testing or waste profiling shall be conducted prior to disposal of lead containing waste. If practicable, lead wastes shall be segregated to minimize the volume of possible hazardous waste. If lead-containing and non-lead waste materials are comingled during demolition, composite samples of representative waste shall be analyzed by a certified lab to determine proper disposal requirements. **Plan Requirements and Timing.** The project applicant shall prepare the lead-based pain abatement plan and contract with an abatement contractor prior to the issuance of the Zoning Clearance associated with the demolition permit. **Monitoring.** The Director of Planning and Environmental Review or Designee shall approve the lead based paint abatement plan prior to the issuance of Zoning Clearance and then check the abatement contractor's monitoring log to ensure project-specific recommendations are enacted during project demolition activities. **HAZ-3: Groundwater Investigation and Disposal** Prior to issuance of Zoning Clearance for construction or grading, the project applicant shall retain a qualified environmental consultant (Professional Geologist [PG] or Professional Engineer [PE]) to conduct a groundwater investigation of groundwater at the project site for potential contaminants of concern. The PG or PE shall prepare a groundwater investigation report, which shall be submitted to the City's Director of Planning and Environmental Review for review and approval prior to the issuance of the Zoning Clearance associated with grading permits. As part of the groundwater investigation, analytical results shall be screened against the Central Coast Regional Water Quality Control Board (RWQCB) environmental screening levels. These environmental screening levels are risk-based screening levels for direct exposure of a construction worker and commercial/ industrial land use. The groundwater investigation report shall include recommendations to address identified hazards and indicate when to apply those recommended actions in relation to project activities. If contaminants are detected in groundwater at the project site, the project applicant shall implement the recommendations specified in the groundwater investigation report to protect site workers during project construction. If disposal of contaminated groundwater is required during construction of the project, the Central Coast RWQCB and/or the City shall be consulted to determine if the treated groundwater can be disposed of through one of their waste discharge permit options. Based on the concentrations of chemical constituents of contaminated groundwater, the Central Coast RWQCB may require that an individual National Pollution Discharge Elimination System (NPDES) permit and/or waste discharge requirements be obtained for dewatering activities.	

Impact	Mitigation Measure (s)	Residual Impact

Plan Requirements and Timing. The project applicant shall retain a qualified environmental consultant to conduct the groundwater investigation prior to the issuance of Zoning Clearance associated with the issuance of grading permits.

Monitoring. Following submittal of the subsurface investigation report, the Director of Planning and Environmental Review or Designee shall review project construction plans to ensure applicable recommendations from the groundwater investigation report are integrated into construction plans.

HAZ-4: Soil Remediation

The 15-foot diameter area that is to the west of the existing concessions stand and encompasses soil sample location SS-1, as defined in the *Environmental Soils Analysis* (Appendix O), shall be sequestered for further analysis to determine if the soils can be reused on site or if should be disposed of off-site. If the soil testing results indicate that the soils exceed environmental screening levels, then the soils shall not be reused on site. The City shall retain a qualified consultant (Professional Geologist or Professional Engineer) to properly sample, delineate, and remove and/or dispose of the contaminated soil. The qualified consultant shall utilize the project site analytical results for waste characterization purposes to determine the appropriate methods for off-site transportation and disposal of potentially impacted soils. The qualified consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils and/or provide recommendations for remedial engineering controls, if appropriate. The City's Director of Planning and Environmental Review or Designee shall review and approve the disposal recommendations for regulated waste prior to transportation of impacted soils off-site, and review and approve remedial engineering controls prior to construction.

Subsequently, the project applicant shall review and implement the project site disposal recommendations for regulated waste prior to transportation of impacted soils off-site, and review and implement remedial engineering controls, prior to the start of grading.

Plan Requirements and Timing. The project applicant shall retain a qualified environmental consultant to sequester, sample, and dispose of contaminated soil prior to the issuance of grading permits.

Monitoring. The Director of Planning and Environmental Review or Designee shall review contaminated soil disposal recommendations prior to transportation of impacted soils off-site.

HAZ-5: Site Management Plan

The project applicant shall retain a qualified environmental consultant (Professional Geologist or Professional Engineer) to prepare a Site Management Plan (SMP) prior to the issuance of Zoning Clearance associated with grading permit. The SMP, or equivalent document, shall be prepared to address on-site handling or management of impacted soils or groundwater if such soils or impacted wastes are encountered during the groundwater investigation or soil remediation, and reduce hazards to construction workers and offsite receptors during construction. The project applicant shall submit the SMP to the City's Director of Planning and Environmental Review, who shall review the SMP prior to issuance of Zoning Clearance for grading permits.

The SMP shall establish remedial measures and/or soil or groundwater management practices to ensure construction worker safety, the health of future workers and visitors, and the prevention of offsite migration of contamination from the project site. These measures and practices may include, but are not limited to:

- Stockpile management including stormwater pollution prevention and the installation of Best Management Practices (BMPs)
- Collection of groundwater samples during dewatering
- Proper disposal procedures of impacted materials
- Monitoring and reporting
- A health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of project site construction activities with the requirements and procedures for employee protection.
- The health and safety plan shall outline proper soil and groundwater handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.
- Proper handling procedures for unexpected contamination, such as halt-work and avoidance protocols, and City and contractor notifications

The SMP shall also specify the procedures to be implemented in the event unexpected hazardous materials are encountered during construction. If unexpected odorous or visually stained soils, other indications of hydrocarbon piping or equipment, or debris are encountered during ground-disturbing activities, the construction contractor shall halt work in the immediate area and a qualified environmental consultant (PG or PE) shall be contacted immediately to evaluate the situation. The qualified environmental consultant shall evaluate the material and recommend the appropriate testing, removal, and disposal methods. The construction contractor shall ensure hazardous materials are removed or remediated in accordance with the requirements of the qualified environmental consultant and the SMP. Construction work may continue on other parts of the project while soil investigation and/or remediation takes place. The construction contractor shall not resume work until approved by the qualified environmental consultant and the City.

Impact	Mitigation Measure (s)	Residual Impact
	Plan Requirements and Timing. The project applicant shall retain a qualified environmental consultant to prepare the SMP prior to the issuance of Zoning Clearance and provide it to the Planning and Environmental Review Director or designee for approval prior to the issuance of the Zoning Clearance associated with grading permits. **Monitoring.** Following approval of the SMP, the Director of Planning and Environmental Review or Designee shall review project construction plans to ensure applicable recommendations from the SMP are integrated into construction plans provided for approval of the Zoning Clearance for construction.	
Impact HAZ-3. The closest school to the project site is the Rainbow School, located approximately 0.5 mile north of the project site. The project would have no impact regarding hazardous material emissions within 0.25 mile of an existing or proposed school.	None required.	No impact.
Impact HAZ-4. Hazardous materials were historically used at the project site for agriculture. The project site is not included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, and the project would not create a significant hazard to the public or the environment. The project would have no impact.	None required.	No impact.
Impact HAZ-5. The project site would be located within Safety Zones and the Airport Influence Area for the Santa Barbara Municipal Airport. However, compliance with existing Federal Aviation Administration regulations ensures the proposed project would not result in a safety hazards for people residing or working in the project area. Project impacts would be Class III, less than significant.	None required.	Less than significant.
Impact HAZ-6. Project construction and operation would not result in impairment or interference within emergency response or evacuation plans. Impacts would be Class III, less than significant.	None required.	Less than significant.
Impact HAZ-7. The project site is not located in a fire hazard area, and project construction and operation would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be Class III, less than significant.	None required.	Less than significant.
Cumulative Impacts. Cumulative hazards and hazardous materials impacts would be less than significant, and the project's contribution would not be cumulatively considerable.	None required beyond project-level mitigation measures.	Not cumulatively considerable.
Hydrology and Water Quality		
Impact HYD-1. Demolition of existing facilities and construction and operation of the project could degrade water quality through increased rates of erosion, sedimentation, and discharge of pollutants, particularly during work within San Jose Creek. With implementation of Mitigation Measures GEO-1, HAZ-3, and BIO-3, water quality impacts would be Class II, less than significant with mitigation incorporated.	Mitigation Measures BIO-3, GEO-1, and HAZ-3 would be required.	Impacts would be less than significant with mitigation incorporated.
Impact HYD-2. The proposed project would require minimal groundwater extraction during groundwater dewatering activities and would not substantially decrease infiltration rates on-site. The proposed project would be supplied water by the Goleta Water District in accordance with the requirements of the Wright Judgement. Impacts to groundwater would be Class III, less than significant.	None required.	Less than significant.
Impact HYD-3. Construction and operation of the proposed project would substantially alter the existing drainage pattern of the project site, in a manner which could result in substantial erosion or siltation on- or off-site. Implementation of Mitigation Measure GEO-1 would be required, and impacts would be Class II, less than significant with mitigation incorporated.	Mitigation Measure GEO-1 would be required.	Impacts would be less than significant with mitigation incorporated.
Impact HYD-4. Construction and operation of the proposed project would not substantially alter the existing drainage pattern of the project site in a manner which could result in flooding on- or off-site. impacts would be Class III, less than significant.	None required.	Less than significant.
Impact HYD-5. Construction and operation of the proposed project would not result in runoff water that exceeds the capacity of existing or planned stormwater drainage systems. However, construction and operation of the proposed project would alter the existing drainage pattern of the project site in a manner that could provide substantial additional sources of polluted runoff. Implementation of Mitigation Measure GEO-1, BIO-3, and HAZ-3 would be required, and impacts would be Class II, less than significant with mitigation incorporated.	Mitigation Measures BIO-3, GEO-1, and HAZ-3 would be required.	Impacts would be less than significant with mitigation incorporated.
Impact HYD-6. The proposed project would not substantially alter the existing drainage pattern of the project site in a manner which would impede or redirect flood flows. Impacts would be Class III, less than significant.	None required.	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
Impact HYD-7. The proposed project would not risk the release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone. Impacts would be Class II, less than significant with mitigation incorporated.	Mitigation Measure GEO-1 would be required.	Impacts would be less than significant with mitigation incorporated.
Impact HYD-8. The proposed project would be subject to regulatory requirements which would minimize the potential to impair water quality. In addition, the proposed project would implement Mitigation Measures GEO-1, HAZ-3, and BIO-3 to reduce potential water quality impacts related to construction. These measures would ensure the proposed project would not conflict with the Central Coast Regional Water Quality Control Board's Basin Plan. The proposed project would not conflict with or obstruct groundwater management requirements that the Goleta Water District follows. Therefore, the proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. This impact would be Class II, less than significant with mitigation incorporated.	Mitigation Measures BIO-3, GEO-1, and HAZ-3 would be required.	Impacts would be less than significant with mitigation incorporated.
Cumulative Impacts. The project's contribution to cumulative hydrology and water quality impacts would not be cumulatively considerable.	None required beyond project-level mitigation measures.	Not cumulatively considerable.
Land Use and Planning		
Impact LU-1. The project would not physically divide an established community, and there would be no impact.	None required.	No impact.
Impact LU-2. The project would be consistent with the City's Coastal Zoning Ordinance, the Santa Barbara County Airport Land Use Plan, and the Goleta Slough State Marine Conservation Area. Even with implementation of mitigation, the project would be potentially inconsistent with 7 of the 50 applicable General Plan/Coastal Land Use Plan policies. Overall, impacts would be Class I, s*ignificant and unavoidable*.	Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, and NOI-1 would be required. However, incorporation of this mitigation would not reduce the impact level to less than significant.	Impacts would remain significant and unavoidable.
Cumulative Impacts. Cumulative land use and planning impacts would be less than significant, and the project's contribution would not be cumulatively considerable.	None required.	Less than significant.
Noise		
Impact NOI-1. Short-term construction of the project would temporarily increase local noise levels that may exceed Goleta's construction noise standard of 65 A-weighted decibels. Through implementation of Mitigation Measure NOI-1, impacts would be Class II, less than significant with mitigation incorporated.	**NOI-1: Construction Noise Reduction** The construction contractor shall prepare and submit a Construction Noise Control Plan to the City of Goleta Planning and Environmental Review Director or designee for review and approval prior to issuance of a Zoning Clearance for a grading permit/demolition permit. The Construction Noise Control Plan shall specify the noise reduction measures to be implemented during project construction to ensure noise levels do not exceed 65 dBA at nearby sensitive receptors at the Rancho Goleta mobile home community to the east. The measures specified in the Construction Noise Control Plan shall be included on the building and grading plans and shall be implemented by the construction contractor during construction. At a minimum, the Construction Noise Control Plan shall include the following measures: ▪ Installation of 12-foot high temporary sound barriers/blankets to break the line of sight between construction equipment and nearby residences at the Rancho Goleta mobile home community to the east. See Figure 4.4-2 for an approximation of the extent of the temporary noise barrier. The barriers shall be at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. Alternately, if sound blankets are preferred, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher. ▪ To the extent consistent with applicable safety regulations, trucks operating with reverse motions alarms shall be outfitted with SAE J994 Class D or equivalent alarms (ambient-adjusting, or "smart alarms" that automatically adjust the alarm to 5 dBA above the ambient near the operating equipment), or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws. ▪ A construction notification sign shall be posted at the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City of Goleta's and the contractor's authorized representatives that are assigned to respond in the event of a noise complaint. If the authorized contractor's representative receives a complaint, that person shall investigate, take appropriate corrective action, and report the action to the City of Goleta. **Plan Requirements and Timing:** The Planning and Environmental Review Director or designee shall approve the Construction Noise Control Plan prior to issuance of the Zoning Clearance for the grading permit/demolition permit. The measures specified in the Construction Noise Control Plan shall be included on the building and grading plans Sound barrier and blankets and construction notification sign shall be installed on the project site prior to initiation of ground-disturbance activities and shall be maintained throughout the duration of construction. Reverse motions alarms and upgraded silencers shall be outfitted on construction vehicles and equipment throughout the duration of construction where feasible.	Impacts would be less than significant with mitigation incorporated.

Impact	Mitigation Measure (s)	Residual Impact
	Monitoring: The City shall monitor compliance with the requirements of the Construction Noise Control Plan periodically during construction and shall promptly investigate and respond to all noise complaints.	
Impact NOI-2. The project would include loading bay and mechanical equipment activities that would increase noise levels during project operation. However, noise levels generated during project operation would not exceed the City's noise thresholds at the nearest properties. Impacts would be Class III, less than significant.	None required.	Less than significant.
Impact NOI-3. Project construction and operation would generate new vehicle trips that would increase noise levels on nearby roadways. Project construction and operation would not result in a traffic noise increase of 3 A-weighted decibels or more; impacts would be Class III, less than significant.	None required.	Less than significant.
Impact NOI-4. Project construction would result in groundborne vibration in the project site vicinity. Vibration levels during project construction would not cause damage to nearby structures. This impact would be Class III, less than significant.	None required.	Less than significant.
Impact NOI-5. The project would not result in exposure of people working in the area to excessive airport noise levels. This impact would be Class III, less than significant.	None required.	Less than significant.
Cumulative Impacts: Cumulative noise and vibration impacts would be less than significant, and the project's contribution would not be cumulatively considerable.	None required beyond project-level mitigation measures.	Not cumulatively considerable.
Public Services		
Impact PS-1. The additional employment required for the proposed project could result in indirect population growth. However, the potential indirect population growth would not increase the demand for fire services such that new or physically altered facilities would be needed to adequately maintain service ratios. The project site's proximity to existing facilities would not necessitate the provision of new or physically altered fire protection facilities. However, the proposed project would be required to pay developer fees, including fees for emergency services. With payment of the required fees, this impact would be Class III, less than significant.	None required.	Less than significant.
Impact PS-2. The additional employment required for the proposed project could result in indirect population growth. However, the potential indirect population growth would not increase the demand for fire services such that new or physically altered facilities would be needed to adequately maintain service ratios. The project site's proximity to existing facilities would not necessitate the provision of new or physically altered fire protection facilities. However, the proposed project would be required to pay developer fees, including fees for emergency services. With payment of the required fees, this impact would be Class III, less than significant.	None required.	Less than significant.
Impact PS-3. The additional employment required for the proposed project could indirectly increase the student population of Goleta Unified School District and/or Santa Barbara Unified School District. However, the proposed project would be required to pay developer fees, including school Fees. With payment of the required fees, the proposed project's impacts to schools would be Class III, less than significant.	None required.	Less than significant.
Impact PS-4. The additional employment required for the proposed project could result in indirect population growth. However, the proposed project would not induce substantial population growth such that new or physically altered libraries would be required. Therefore, this impact would be Class III, less than significant.	None required.	Less than significant.
Cumulative Impacts: Cumulative public services impacts would be less than significant, and the project's contribution would not be cumulatively considerable.	None required.	Not cumulatively considerable.
Transportation and Circulation		
Impact TRA-1. The proposed project would be consistent with applicable Transportation Element policies and would not result in substantial interference with existing Santa Barbara Metropolitan Transit District operations. Therefore, this impact would be Class III, less than significant.	None required.	Less than significant.
Impact TRA-2. The project site is located in an area in which work-based projects have been determined by the City to have a less than significant impact on vehicle miles traveled. Therefore, the proposed project would not conflict with California Environmental Quality Act Guidelines Section 15064.3, subdivision (b), and impacts would be Class III, less than significant.	None required.	Less than significant.
Impact TRA-3. The proposed project would be required to comply with the Santa Barbara County Fire Department standards and therefore would not substantially increase hazards. This impact would be Class III, less than significant.	None required.	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
Impact TRA-4. The proposed project's design would be required to comply with the Santa Barbara County Fire Department standards and therefore would not result in inadequate emergency access. This impact would be Class III, less than significant.	None required.	Less than significant.
Cumulative Impacts: The project's contribution to cumulative transportation impacts would not be cumulatively considerable.	None required.	Less than significant.
Tribal Cultural Resources		
Impact TCR-1. Construction of the project would involve ground disturbing activities such as grading and surface excavation. However, no tribal cultural resources have been identified on the project site and there is no potential for archaeological resources to occur within the project site. This impact would be Class III, less than significant.	None required.	Less than significant.
Cumulative Impacts. The project would not have a cumulatively considerable contribution to cumulative tribal cultural resources impacts.	None required.	Not cumulatively considerable.
Utilities and Service Systems		
Impact UTIL-1. The proposed project would require installation of utility lines to connect to existing utility infrastructure, the environmental effects of which are analyzed throughout this Environmental Impact Report. The proposed project would not require or necessitate the construction of additional water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities beyond the installation of utility connections on the project site. Therefore, this impact would be Class III, less than significant.	None required.	Less than significant.
Impact UTIL-2. The proposed project would generate water demand of approximately 19.8 acre-feet per year. The Goleta Water District has determined the project site has adequate water credit for the proposed project's anticipated demand, and the proposed project's anticipated demand would not cause a reduction in water supplies such that a water deficit would occur. Therefore, this impact would be Class III, less than significant.	None required.	Less than significant.
Impact UTIL-3. The proposed project's anticipated wastewater generation would be adequately accommodated by the existing capacity of the Goleta Sanitary District Wastewater Treatment Plant. Therefore, this impact would be Class III, less than significant.	None required.	Less than significant.
Impact UTIL-4. The proposed project would generate an estimated 279 tons per year of solid waste during demolition and construction and an estimated 56.5 tons per year of solid waste during operation. The estimated solid waste generated during demolition and construction activities would be in exceedance of the City's project-specific solid waste threshold of 196 tons per year. This impact would be Class I, significant and unavoidable.	**UTIL-1: Waste Management Plan Additions** In addition to the required components of the Waste Management Plan listed in Chapter 8.10, Article IV of the City's Municipal Code, the City shall require the Waste Management Plan for the proposed project to include the following: Implementation of a program to purchase materials that have recycled content for project construction. The project applicant shall note the vendor, types of materials, and quantity of materials with recycled content the applicant shall purchase for construction. Implementation of a program which requires the construction contractor to separate excess demolition and construction materials on-site for reuse/recycling or proper disposal. The project applicant shall describe the on-site locations where recyclable and non-recyclable materials shall be stored prior to removal. The project applicant shall provide separate on-site bins as needed for recycling. The applicant shall submit the Waste Management Plan, with the additional requirements listed above, to the Director of Public Works Department, or designee, for review and approval prior to the issuance of the Zoning Clearance associated with the demolition permit. The Director of the Public Works Department, or designee, shall assign a monitor to the project who shall confirm, on a quarterly basis, demolition and construction waste is being separated on-site for reuse/recycling or proper disposal. The applicant shall submit proof of purchased construction materials with recycled content through submittal of receipts for the purchase of these materials. The Director of the Public Works Department, or designee shall certify the requirements of the Waste Management Plan, with implementation of additional measures listed above, have been met no later than 30 days following the end of construction. **Plan Requirements and Timing:** The applicant shall coordinate with the Director of Public Works Department, or designee, and prepare a Waste Management Plan as specified in the measure prior to the issuance of the Zoning Clearance associated with a demolition permit. The applicant shall submit receipts for the purchase of construction materials with recycled content to the Director of the Public Works Department, or designee, prior to the issuance of the Certificate of Occupancy. The Director of the Public Works Department, or designee shall confirm the requirements of the applicant's Waste Management Plan have been met no later than 30 days after the end of construction. **Monitoring:** A monitor chosen by the Director of Public Works Department, or designee, shall inspect the project site on a quarterly basis from the start of construction activities.	Impacts would remain significant and unavoidable.

Impact	Mitigation Measure (s)	Residual Impact
Cumulative Impacts. Project construction would have a cumulatively considerable contribution to cumulative solid waste impacts. This impact would be Class I, significant and unavoidable.	Mitigation Measure UTIL-1 would be required.	Impacts would remain significant and unavoidable.

1 Introduction

This document is an Environmental Impact Report (EIR) for a proposed industrial building development located at 907 South Kellogg Avenue in Goleta, California. The proposed Sywest Industrial Building Project (hereafter referred to as the "proposed project") would be constructed on a site previously used as an outdoor drive-in movie theater and public market on Sundays (herein referred to as "project site"). The proposed project would include demolition of an existing freestanding movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box; and construction of a 70,594 square foot industrial warehouse building with truck loading zones, a parking lot, landscaping, and walkways. The proposed project includes a request to reduce the 100-foot Streamside Protection Area buffer at the San Jose Creek to 25 feet. The proposed project is described in detail in Section 2, *Project Description*.

This section discusses (1) the legal basis for preparing an EIR; (2) the scope and content of the EIR; (3) the lead, responsible, and trustee agencies; and (4) the environmental review process required under the California Environmental Quality Act (CEQA).

1.1 Purpose and Legal Authority

The proposed project requires the discretionary approval of the Goleta Planning Commission and City Council. Therefore, the proposed project is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines* (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

> "...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This EIR has been prepared as a project EIR pursuant to Section 15161 of the *CEQA Guidelines*. A Project EIR is appropriate for a specific development project. As stated in the *CEQA Guidelines*:

> "This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation."

This EIR is to serve as an informational document for the public and the decision makers of the City of Goleta. The process will include public hearings before the Goleta Planning Commission and City Council to consider certification of a Final EIR and approval of the proposed project.

1.2 Environmental Scoping

The City of Goleta distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on April 28, 2023 to May 30, 2023. The City published the NOP in the Santa Barbara News-Press on April 28, 2023, and the Santa Barbara Independent on May 4, 2023. In addition, the City held a scoping meeting on May 17, 2023, at 5:00 pm at the Goleta City Hall. The City received eight letters from four agencies, one Native American tribe, and three organizations in response to the NOP during the public review period. The NOP and NOP responses are presented in

Appendix A of this EIR. Table 1-1 summarizes the content of the letters and verbal comments received, and where the issues raised in comments are addressed in the EIR.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request	How and Where It Was Addressed
Agencies		
Cody Campagne, Native American Heritage Commission	The commenter recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.	Impacts to tribal cultural resources are discussed in Section 4.14, *Tribal Cultural Resources*. As part of the Assembly Bill (AB) 52 consultation process, the City sent letters to the Santa Ynez Band of Chumash Indians, the Barbareño/Ventureño Band of Mission Indians, and the Coastal Band of the Chumash Nation on April 25, 2018. No requests for tribal consultation were received pursuant to AB 52. The City is actively working with the Santa Ynez Band of Chumash Indians, although not as part of the formal consultation process.
Zack Nelson, California Department of Conservation Geologic Energy Management Division	The commenter asks if a site plan will be available for the project.	Project site plans are included in Section 2, *Project Description*.
Tiffany Martinez, Caltrans Aeronautics Office of Aviation	The commenter advises the City of Goleta to submit project plans upon completion to the Airport Land Use Commission to determine if the plans or projects are consistent or not with the Airport Land Use Compatibility Plan according to the State Aeronautics Act's statutory procedure.	As stated in Section 4.8, *Hazards and Hazardous Materials*, the City engaged with the Santa Barbara County Association of Governments, in their capacity as the Airport Land Use Commission, in August 2023. The Santa Barbara County Association of Governments determined that the project would not be required to undergo Airport Land Use Commission review as the previous zoning ordinance and General Plan were found consistent with the 1993 Santa Barbara County Airport Land Use Plan and the project does not require any amendments to either.
Emily Waddington, Santa Barbara Air Pollution Control District	The commenter requests that the EIR evaluate attainment status and consistency with the District's Ozone Plan, impacts to sensitive receptor and the potential for nuisance issues, increases in criteria pollutant emissions, asbestos reporting requirements, and greenhouse gas impacts.	Section 4.2, *Air Quality*, evaluates the project's impacts regarding attainment status and consistency with air quality plans, impacts to sensitive receptors and the potential for nuisance issues, and increases in criteria pollutant emissions. Section 4.8, *Hazards and Hazardous Materials*, evaluates the project's impacts involving asbestos and outlines asbestos reporting requirements in Mitigation Measure HAZ-1. Section 4.7, *Greenhouse Gas Emissions*, evaluates the project's impacts involving greenhouse gas emissions.

Commenter	Comment/Request	How and Where It Was Addressed
Organizations		
Ken Palley, Surfrider Foundation	The commenter requests an evaluation of impacts regarding reduction of the San Jose Creek buffer, including impacts to birds, other species, flooding, and water pollution. The commenter offers project alternatives that the EIR may consider.	Section 4.3, *Biological Resources*, evaluates the project's impacts to birds and other wildlife species, as well as the reduction of the San Jose Creek Streamside Protection Area (SPA) buffer. Additionally, Section 4.10, *Land Use and Planning*, discusses impacts from reduction of the San Jose Creek SPA buffer. Section 4.9, *Hydrology and Water Quality*, evaluates the project's impacts involving flooding, drainage, and water quality. Section 6, *Alternatives*, provides an explanation of project alternatives, including the alternative selection process, as required by the CEQA Guidelines Section 15126.6.
Brad Frohling, Radius Group Commercial Real Estate	The commenter expresses a need for industrial spaces in Goleta and supports the project.	The commenter's support is noted.
Armita Ariano, Southwest Regional Council of Carpenters	The commenter states that the City should use a local workforce to benefit the community's economic development and environment and that the City should impose training requirements during construction activities to prevent the spread of infectious diseases.	Analysis of a project's impact to economic development and spread of infectious diseases is not required under CEQA. Project impacts involving greenhouse gas emissions from construction worker vehicles is discussed in Section 4.7, *Greenhouse Gas Emissions*.
Native American Tribes		
Crystal Mendoza, Santa Ynez Band of Chumash Indians	The commenter expresses their desire for formal consultation regarding the project.	The City is actively working with the Santa Ynez Band of Chumash Indians, although not as part of the formal consultation process. The consultation process and details are described in Section 4.14, *Tribal Cultural Resources*.

Through the NOP and EIR scoping process, the City determined there was no substantial evidence the proposed project would cause or otherwise result in significant environmental effects in the areas of Agriculture and Forestry Resources, Mineral Resources, Population and Housing, Parks and Recreation, and Wildfire. The substantiation for determining these issues would result in no impacts, or a less-than-significant impact is described in further detail in Section 4.15, *Effects Not Found to be Significant*.

The EIR addresses impacts identified by the initial scoping process to be potentially significant. The following issues were found to include potentially significant impacts and have been studied in detail in the EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gases

- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Transportation and Circulation
- Tribal Cultural Resources
- Utilities and Service Systems

In preparing the EIR, use was made of pertinent City policies and guidelines and other background documents. A full reference list is contained in Section 7, *References*.

Section 6, *Alternatives*, was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the proposed project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required "No Project" alternative and two alternative development scenarios for the project site.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based. The *CEQA Guidelines* state:

> "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure."

1.3 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible and trustee agencies. The City of Goleta is the lead agency for the project because it holds principal responsibility for approving the proposed project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. Responsible agencies for this project include the California Coastal Commission, which is responsible for approving Coastal Development Permits, the State Water Resources Control Board and Central Coast Regional Water Quality Control Board, which regulates water quality in the region, and Santa Barbara County Flood Control District, which regulate floodplain development. The California Department of Fish and Wildlife, United States Army Corps of Engineers (USACE), National Marine Fisheries Service, and United States Fish and Wildlife Service all have jurisdiction over biological resources, including those within San Jose Creek. The Santa Barbara County Fire Department reviews and approves site plans, the Goleta Sanitation District issues Sewer Connection Permits, and the Goleta Water District issues Can and Will Serve Letters. The Federal Aviation Administration will review the project for consistency with airport safety regulations. The EIR will also be submitted to these agencies for review and comment.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the proposed project.

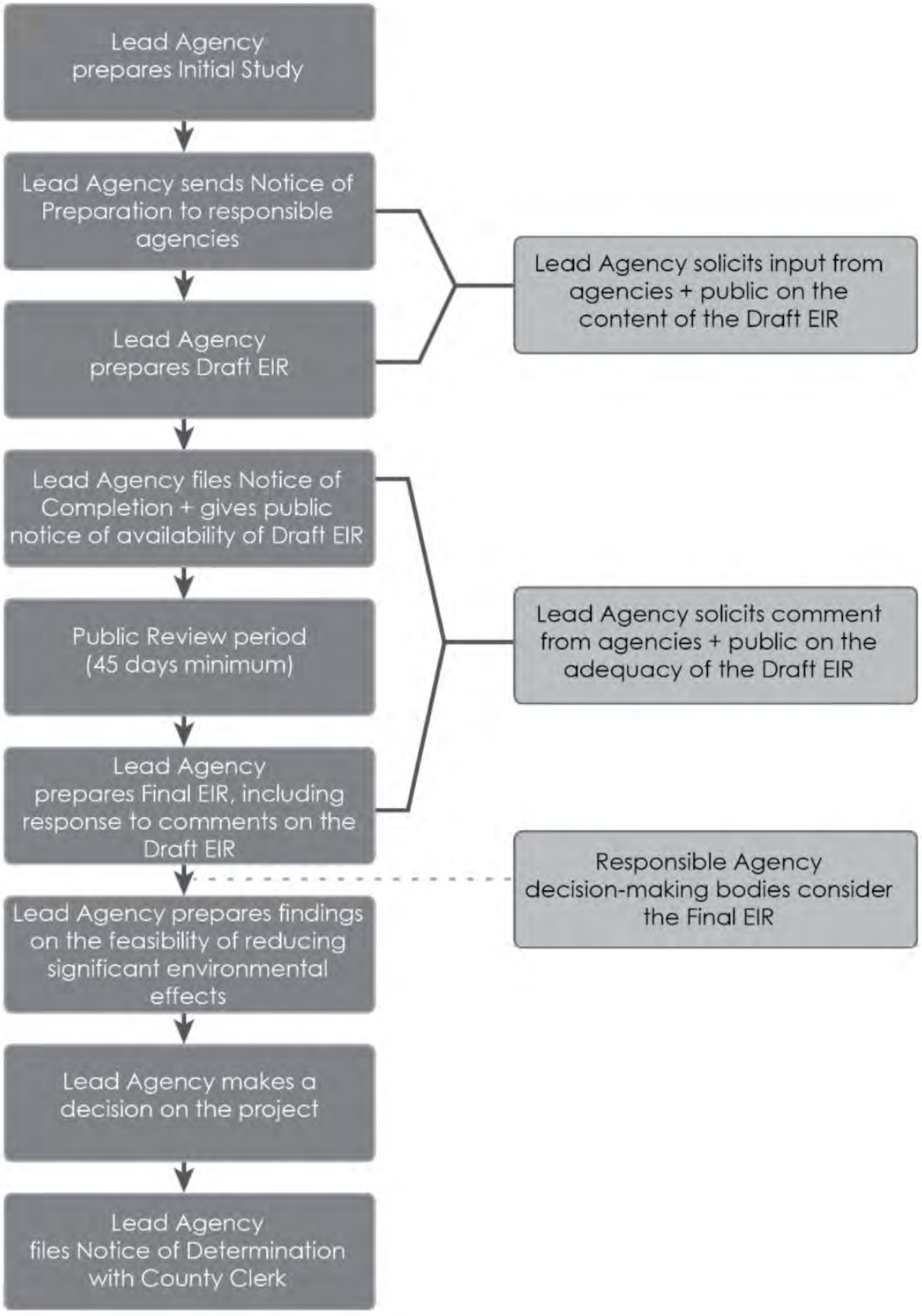
1.4 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation (NOP) and Initial Study**. After deciding that an EIR is required, the lead agency (City of Goleta) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days.
2. **Draft EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion/Notice of Availability.** The lead agency must file a Notice of Completion (NOC) with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability (NOA) of a Draft EIR. The lead agency must place the NOA in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOA to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code Section 21091).
4. **Final EIR.** A Final EIR must include: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).

7. **Findings/Statement of Overriding Considerations**. For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk and submit it to the State Clearinghouse. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1-1 Environmental Review Process



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2 Project Description

This section describes the Sywest Industrial Building Project (proposed project), including the project applicant, lead agency, the project site and surrounding land uses, primary project characteristics, project objectives, and discretionary actions needed for approval.

2.1 Project Applicant

Sywest Development
150 Pelican Way
San Rafael, California 94901
(415) 448-8397

2.2 Lead Agency Contact Person

Brian Hiefield, Associate Planner
City of Goleta
130 Cremona Drive, Suite B
Goleta, California 93117
(805) 961-7559

2.3 Project Location

The 11.77-acre project site is located at 907 South Kellogg Avenue (Assessor's Parcel Number [APN] 071-190-035) in Goleta, California. The proposed project would be developed on approximately 6.75 acres of the northeastern portion of the project site. Existing structures on the site include a drive-in theater with an approximately 3,663 square foot concessions building, freestanding movie screen, three ticket booths, an approximately 200 square foot projector building, pad-mounted transformer, storm drain, agricultural box, and two dewatering wells. The drive-in theater is not currently in operation. Site access is provided from South Kellogg Avenue via a paved access road that runs along the northeastern project site boundary. The remainder of the project site is primarily flat and contains degraded asphalt and a row of trees at the southwest border of the project site. Figure 2-1 shows the project site in a regional context. Figure 2-2 shows the project site boundary, including the 6.75-acre development area and the utility lines and drainage outfall which extend outside of the development area. Figure 2-3 shows the locations of the existing structures on the project site.

The project site is within the Coastal Zone. The entirety of the project site is within a flood hazard zone area (Zone A), as defined by the Federal Emergency Management Agency (FEMA) and within an area subject to future sea level rise (FEMA 2023). The project site is within the inundation zone for the Ranch Del Ciervo dam (DWR 2023). San Jose Creek, located along the eastern project site boundary, is designated as riparian/marsh/vernal pool Environmentally Sensitive Habitat Area (ESHA) in the Conservation Element of the City's General Plan. Land adjacent to the southwestern boundary of the project site is also identified as ESHA.

Figure 2-1 Regional Location



Basemap provided by Esri and its licensors © 2022.

Project Location

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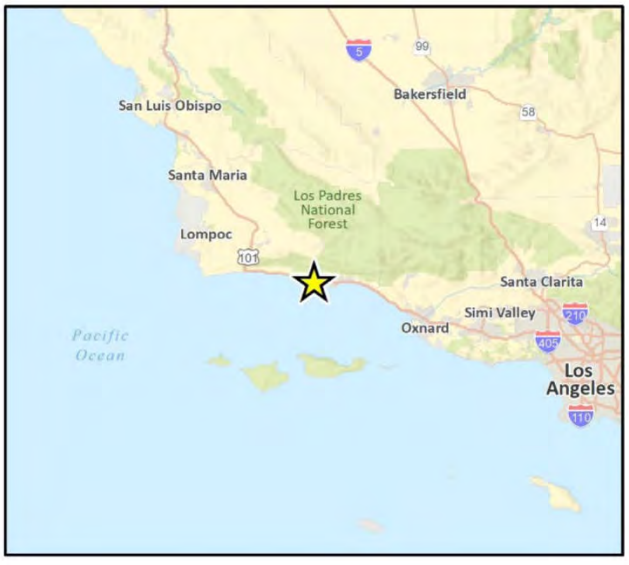


Figure 2-2 Project Site Location



Imagery provided by Microsoft Bing and its licensors © 2023.

Figure 2-3 Existing On-Site Structures



Imagery provided by Microsoft Bing and its licensors © 2023.

2.4 Surrounding Land Uses

The project site is bordered by San Jose Creek and State Route (SR) 217 to the southeast. Residential properties (a mobile home park) are located beyond SR 217 to the east. Industrial development is located to the north and west of the project site. Single-family residences are located west of the project site. These residences are mixed in with industrial and commercial uses (e.g., tow yards, metal shop, and surfacing shop). Undeveloped land with existing vegetation consisting of trees and shrubs is located approximately 260 feet northwest of the project site and 30 feet southwest of the project site. Tidal wetland and stormwater infrastructure is located to the south of the project site.

2.5 Current Land Use and Zoning

The project site was historically used as a drive-in movie theater. In addition, a public market was previously hosted on Sundays on the project site. Operations of the public market and drive in theater ceased in September 2022.

In accordance with Section 17.01.040(E)(4) of the Goleta Municipal Code (GMC), the applicant and the City of Goleta (City) entered into a Development Agreement on May 18, 2021 (which was ratified by the Coastal Commission on April 6, 2022). On September 17, 2024, the City Council approved an extension of the Development Agreement to December 31, 2025. The Development Agreement permits the continued use of prior zoning standards until either the date the City obtains a certified Local Coastal Program or December 31, 2025, whichever occurs earlier.

Because of the adopted Development Agreement, the project is subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code) and City regulations/procedures that were in place prior to the adoption of Title 17 rather than the City's current zoning code. This permits the applicant to measure the height of the building from the finish grade[1] rather than the existing grade prior to the start of development. As part of the Development Agreement, the applicant has granted a license agreement to the City, which includes the right of the City to sublicense to the Santa Barbara County Flood Control District, on the project site for maintenance access to San Jose Creek. Although the previous zoning code does not include specific development standards related to Streamside Protection Area setbacks, General Plan Conservation Element Policy CE 2-2, *Stream Protection Areas,* which requires a 100-foot setback San Jose Creek, is still applicable to the proposed project. However, Policy CE 2-2 specifies that the City can approve a reduction in the setback (to no less than 25 feet) based on a site-specific assessment if: 1) there is no feasible alternative siting for development that will avoid the SPA upland buffer; and 2) the project's impacts will not have significant adverse effects on streamside vegetation or the biotic quality of the stream.

The project site has a General Plan/Coastal Land Use Plan designation of Service/Industrial (I-S) and prior to adoption of Title 17 (Zoning Code) in April 2020, the site was zoned Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL) (Article II, Coastal Zoning Code).[2] Specifically, the southern two-thirds of the site is zoned M-1 and the northern third of the site is zoned M-S-GOL.

[1] The finish grade indicates the final surface elevation of sidewalks, lawns, driveways, or other improved surfaces after completion of construction or grading operations.

[2] While the current zoning on the site is Service Industrial, the project is subject to the is subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code).

2.6 Project Characteristics

The proposed project involves the demolition of an existing freestanding movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box. The project also involves the construction of a 70,594 square foot industrial warehouse building with 60,939 square feet of landscaping, 101 parking spaces, and six loading zones. In addition, the proposed project includes a request to reduce the 100-foot Streamside Protection Area buffer at San Jose Creek to 25 feet along the entire project site boundary adjacent to San Jose Creek, as measured from top of bank or the outer limit of wetlands and/or riparian vegetation, (whichever is greater). As stated in Section 2.5 above, Policy CE 2.2, *Streamside Protection Areas*, in the City's General Plan Conservation Element requires a 100-foot buffer from San Jose Creek. However, the City can approve a buffer reduction on a site-specific basis, but not less than 25 feet wide. As part of the project, the applicant will grant the City and the Santa Barbara County Flood Control District a permanent easement on the project site for vehicular access to and repair and maintenance of the San Jose Creek channel.

2.6.1 Proposed Site Plan

Table 2-1 on the following page provides the proposed project characteristics, including the building area, parking area, and landscaping area. Figure 2-4 shows the proposed site plan, and Figure 2-5 and Figure 2-6 show the building floor and roof plan, respectively. Figure 2-7 shows renderings of the proposed building.

2.6.2 Industrial Warehouse Building

The industrial warehouse building could be divided into up to four sections separated by up to three demising walls[3]. The building would be available for use by up to four tenants. The main entrance to the building would be located on its southeastern side. The building would include 7,198 square feet of office area which would be located inside the main entrance. An electrical room would be located at the northern corner of the building. Two steel doors would be constructed on the southwest and northeast sides of the building, and four steel doors would be located at the northwest side of the building and provide additional access to the building.

[3] A demising wall is a wall that separates two adjacent tenants or a tenant from one of the building's common areas.

Table 2-1 Project Characteristics

General Information	
Address	907 South Kellogg Avenue
APN	071-190-035
Height/Stories	35 feet from finish grade
Lot Area	11.77 acres total 6.75-acre development area
Industrial Warehouse Building	
Tenant Area 1	14,280 sf
Tenant Area 2	18,180 sf
Tenant Area 3	17,980 sf
Tenant Area 4	20,154 sf
Total Building Footprint	**70,594 sf**
Parking	
Standard	96 spaces
Accessible	5 spaces
Total Spaces	**101 spaces**
Total Square Feet	**113,193 sf**
Landscaping	
Landscaping Area	60,339 sf
Total Landscaping Area	**60,939 sf**
Sidewalks	
Sidewalk Area	4,910 sf
Total Sidewalk Area	**4,910 sf**
Loading Zones	
Loading Zones Provided	6 zones
Total Loading Zones	**6 zones**

sf = square feet

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Figure 2-4 Project Site Plan

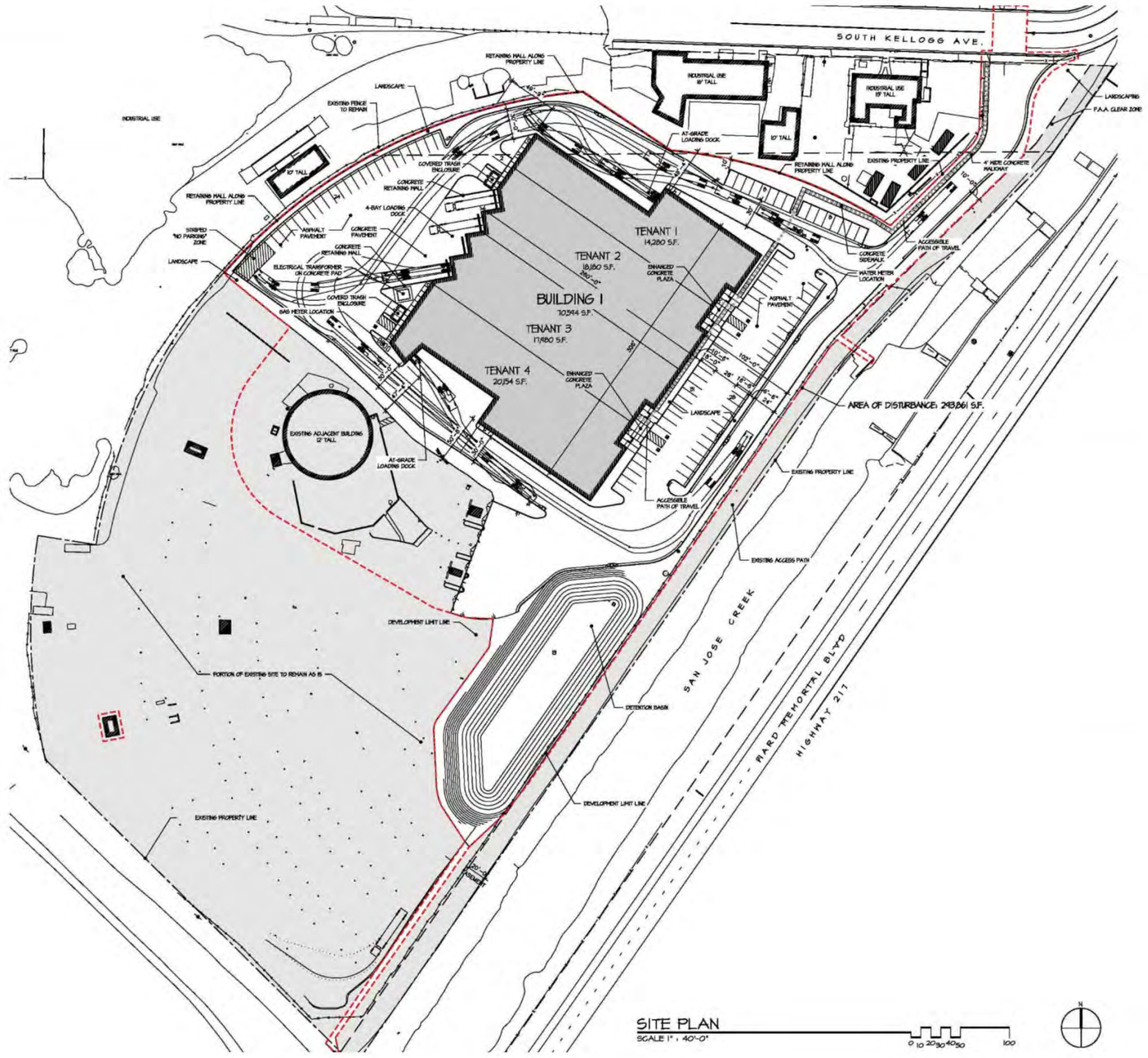
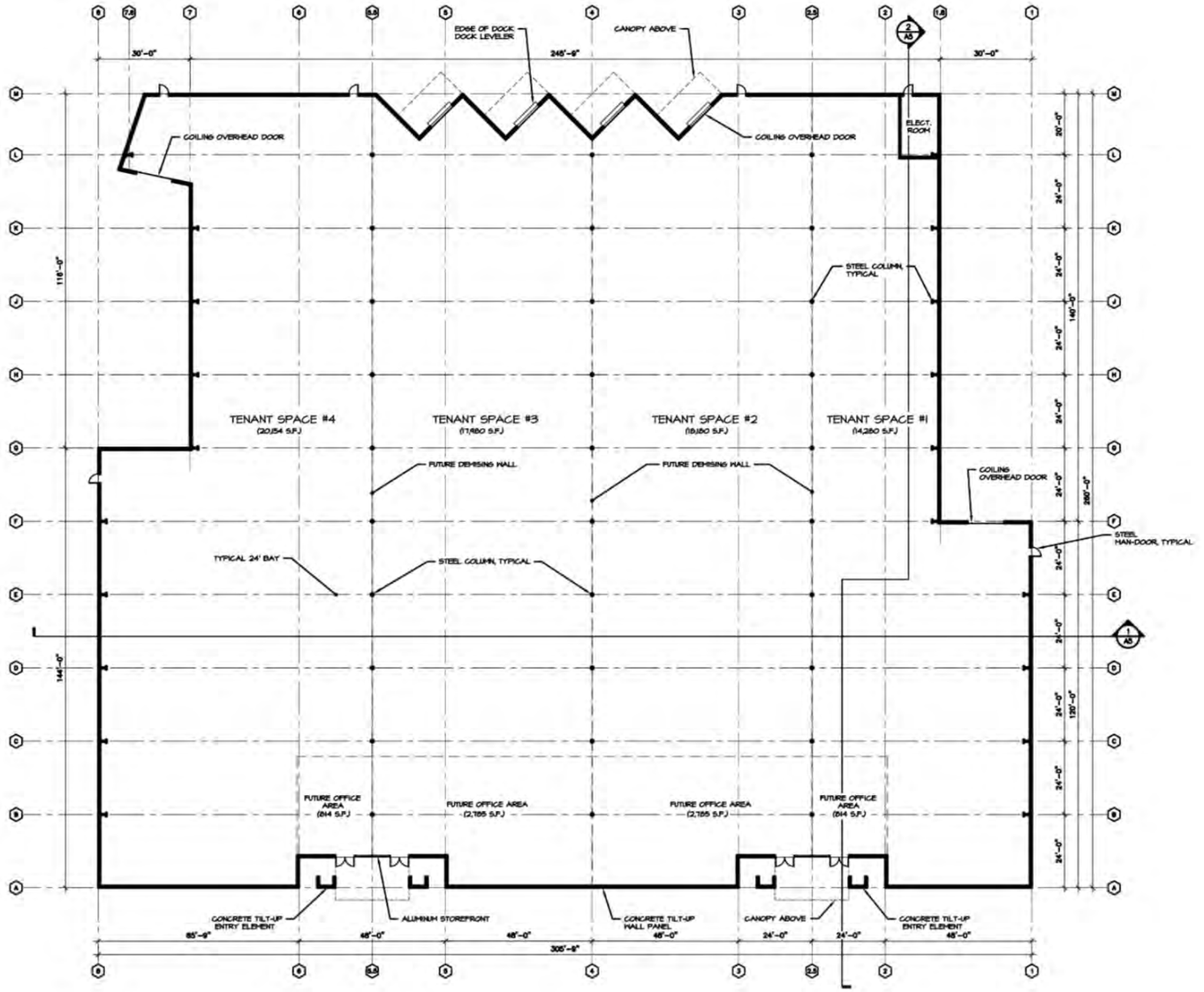


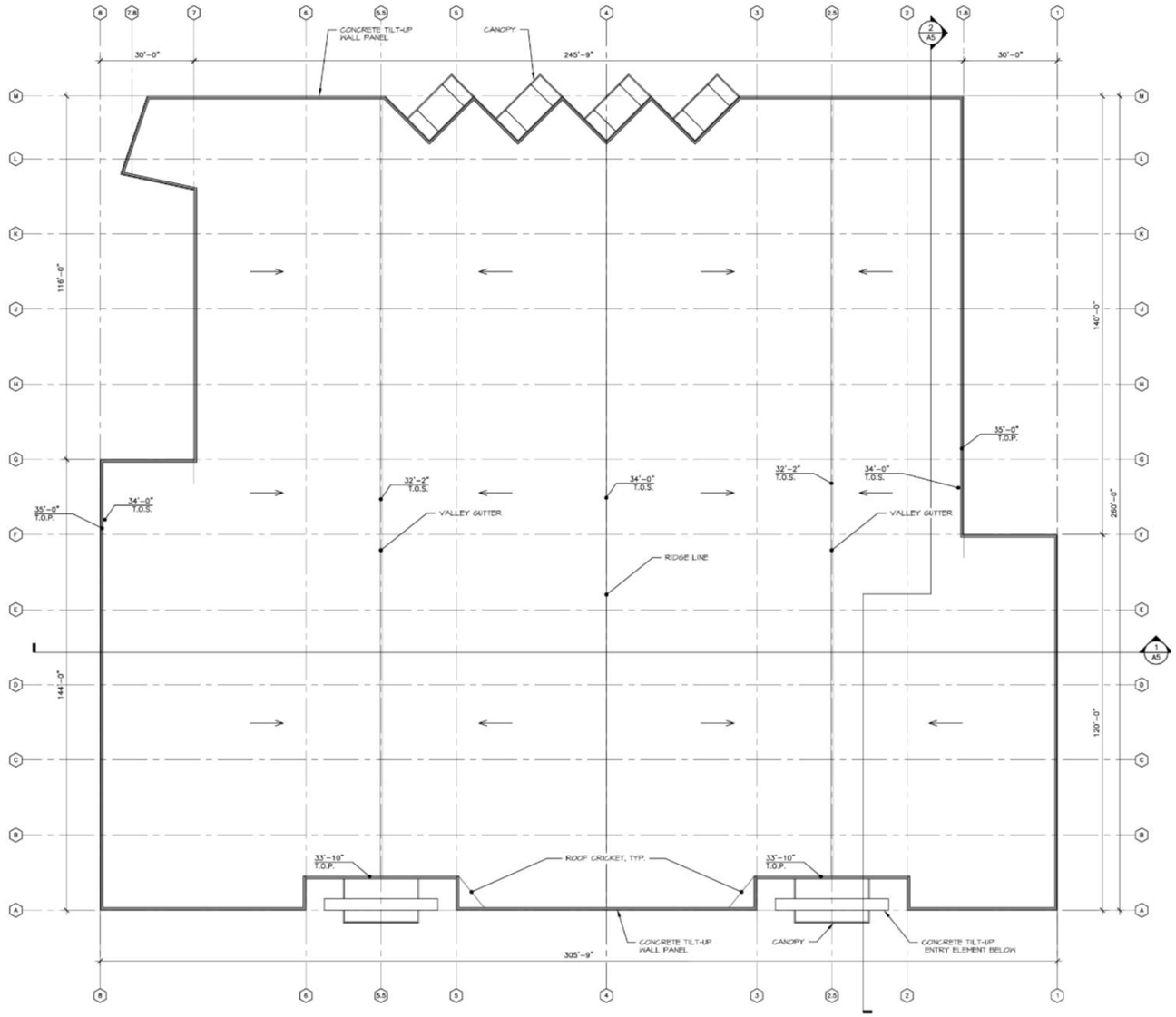
Figure 2-5 Building Floor Plan



Rasmussen & Associates, 2017

0 10 100 Feet N (Project North)

Figure 2-6 Building Roof Plan



Rasmussen & Associates, 2017

0 10 100 Feet N (Project North)

Figure 2-7 Renderings of the Proposed Building



PERSPECTIVE - SOUTHWEST



PERSPECTIVE - NORTHWEST

2.6.3 Site Access and Parking

Access to and from the project site would be provided from South Kellogg Avenue via an existing access road that runs along the northeast project boundary. This existing access road would be resurfaced. The east curb of the driveway connecting the existing access road to South Kellogg Avenue would be widened in order to provide adequate maneuvering area for delivery trucks to enter and exit the project site. In addition, a slope at the southern portion of the project site would be graded to match adjacent grade and install improvements to the driveway connecting to South Kellogg Avenue designed to allow access to the undeveloped portion of the site.

The proposed project would include a surface parking lot to the southeast of the proposed building. The parking lot would include 96 standard uncovered and 5 accessible uncovered parking spaces. Six passenger vehicle spaces and three truck parking spaces would be equipped with Electric Vehicle (EV) chargers, and 19 additional passenger vehicle spaces would be EV capable[4]. In addition, the proposed project would include 10 bicycle parking spaces. Pedestrian access to and from the project site would be provided via a sidewalk which would start at South Kellogg Avenue and extend to the proposed parking lot.

No specific tenants have been identified by the applicant for this building. Proposed operations would involve the use of trucks, anticipated to consist primarily of 6- foot tractor trailers, to bring materials to and from the site based on the anticipated industrial uses allowed by the zoning. Pursuant to the requirements of Title 13, Section 2485, of the California Code of Regulations, truck idling would be limited to 5 minutes or less. Typical uses include indoor warehousing and storage, wholesaling and distribution, construction and material storage, or similar purposes allowed within Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL) zones. On-site uses would not include cold storage, vehicle maintenance or equipment cleaning operations, or storage of large quantities of hazardous materials. Two loading docks would be located on the southwest and northeast sides of the building. Four loading docks would be located at the northwest side of the building. All loading docks would be accessed via a coiling overhead door.

2.6.4 Utility Connections

Table 2-2 summarizes the utility service providers for the proposed project. The following discussion summarizes the utility infrastructure the proposed project would install. The locations of the proposed utility infrastructure is shown in Figure 2-8.

Table 2-2 Utility Service Providers

Utility	Service Provider
Water Service	Goleta Water District
Sewer	Goleta Sanitary District
Natural Gas	Southern California Gas Company
Electricity	Central Coast Community Energy (3CE)
Cable	Cox Communications
Telecommunications	Verizon, Qwest, AT&T, Level 3
Solid Waste	Marborg Industries

[4] EV capable refers to a vehicle space with electrical panel space and load capacity to support electrical infrastructure for EV charging.

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Figure 2-8 Utility Locations



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Water

Water would be provided by the Goleta Water District. The proposed project would include a new 8-inch underground water pipeline that would connect to an existing subsurface 10-inch water line located underneath the sidewalk adjacent to South Kellogg Avenue. The 8-inch subsurface water line would follow the existing driveway and traverse underneath the parking area and around the perimeter of the proposed building. Six fire hydrants would be constructed along the water line. A six-inch fire water line originating at the eastern corner of the building would extend west and connect to the 8-inch underground water pipeline at a point of connection adjacent to the western edge of the parking lot and connect to a proposed fire department connection located adjacent to the proposed concrete sidewalk.

The project site has been allocated water to serve the proposed project based on historical water credits from prior on-site use, as determined by the Goleta Water District. The amount of on-site historical water usage along with the allowable zoning uses has established the maximum square footage of industrial development allowed on the site currently.

Sewer

Sewer services would be provided by the Goleta Sanitary District. The proposed project would include a new 8-inch underground sewer line that would connect to the existing 30-inch sewer line located underneath South Kellogg Avenue. The proposed sewer line would follow the existing driveway and traverse on the exterior of the parking lot, extending adjacent to the southwest and northeast portions of the buildings.

Energy

Natural gas would be used to heat the 7,198-square-foot office and would be provided by Southern California Gas Company. Electricity would be 100 percent renewable and would be provided by the Central Coast Community Energy (3CE) prime option.

2.6.5 Stormwater and Drainage

Under existing conditions, the project site has topography similar to a bowl, with drainage flows directed to two existing stormwater pumps which discharges through the San Jose Creek Channel levee into the San Jose Creek. The project site is underlain by low permeability soils and a high groundwater elevation which makes stormwater infiltration infeasible at the project site. The proposed project would include addition of fill within the development area to direct drainage flows by gravity to the San Jose Creek channel. The proposed project would be required to incorporate best management practices (BMPs) to reduce stormwater runoff from the project site, consistent with the County of Santa Barbara's *Stormwater Technical Guide for Low Impact Development,* which the City adopted in March 2014 (County of Santa Barbara 2014). The proposed project would include installation of stormwater BMPs and drainage infrastructure consistent with the preliminary Stormwater Control Plan prepared for the proposed project in June 2024.

Stormwater runoff from approximately 217,812 square feet of the project site consisting of the paved and landscaped areas of the parking lot and southern portion of the development area would be directed to a detention basin which would be constructed at the southern border of the development area. Outflow from the basin would be directed to a hydrodynamic separator for treatment, prior to discharge to San Jose Creek. The basin outlet is elevated above the basin bottom to allow treatment

of stormwater up to two times the 85th percentile storm water elevation (2.6 inches of rainfall)[5]. Excess stormwater would be discharged via an overflow weir constructed approximately 1.6 feet above the 100-year storm water surface elevation to an existing dewatering well with sump located southwest of the proposed detention basin. The proposed detention basin has been sized to reduce the post-project peak runoff to less than the pre-project peak runoff for storm events between the 2-year and 100-year flood event. A new 18-inch outfall would be constructed in the existing San Jose Creek concrete channel wall in order to discharge overflow into the San Jose Creek.

Stormwater runoff from approximately 14,555 square feet of the northeastern portion of the project site currently drains to an existing storm drain outlet which transports runoff to the San Jose Creek. Runoff in this drainage area would be directed to a vegetated drainage swale located along the eastern side of the entry driveway prior to discharge to the existing storm drain outlet located approximately 115 feet south of the intersection of South Kellogg Avenue and the entry driveway (Figure 2-8). A catch basin inlet filter would be installed at the existing storm drain outlet to treat stormwater.

The proposed project would retain one of the two existing dewatering wells with sump pumps located on the project site. The dewatering well on the northeast portion of the project site would be removed and the dewatering well on the southwest portion of the project site adjacent to the to the proposed detention basin would be retained. Stormwater runoff from 19,584 square feet of the southernly perimeter of the project site would drain to the remaining sump pump and would remain untreated.

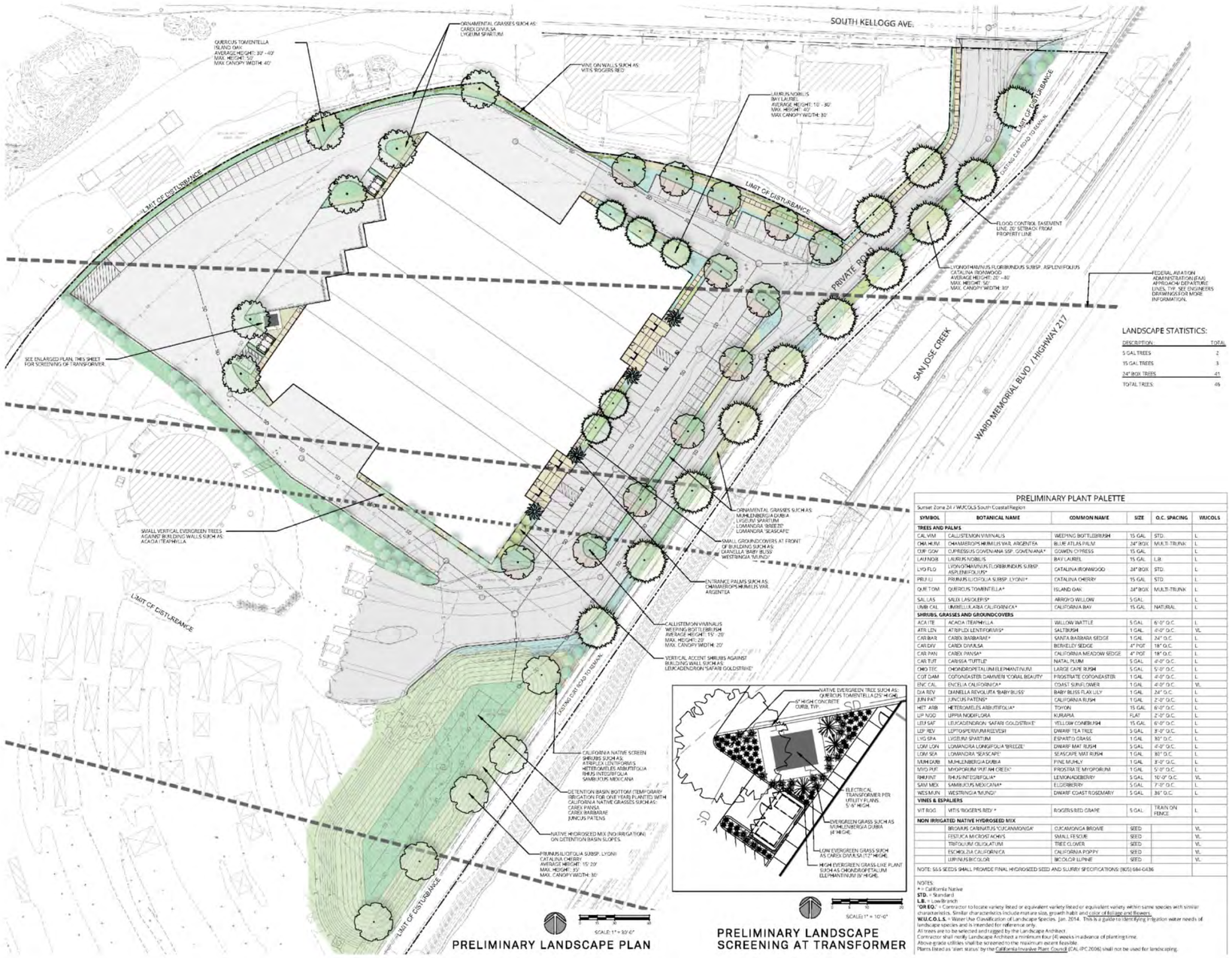
Asphalt-covered areas of the project site would be constructed of permeable asphalt. The proposed project would implement additional BMPs including, but not limited to, use of plants tolerant of saturated soil conditions and avoidance of roofing or gutters made of copper or other unprotected materials that may leach into runoff.

2.6.6 Landscaping

Figure 2-9 shows the Preliminary Landscape Plan for the proposed project, which depicts a preliminary plant palette and landscaping layout for the project site. Existing vegetation within the development area, including the ice plant along the southwestern project boundary, laurel sumac shrubs behind the movie screen, and palm trees next to the concession stand, will be removed. The proposed landscaping would be comprised of native and climate appropriate plants including trees and palms, shrubs, grasses, groundcovers, vines, and espaliers. Plant species in the preliminary plant palette include, but are not limited to, California sycamore, island oak, saltbush, coast sunflower, and elderberry. Landscape treatments would be provided in the proposed detention basin, along the parking lot, along the driveway connecting to South Kellogg Avenue, and at the exterior of the proposed building.

[5] The 85th percentile storm water elevation for a particular location is the amount of rainfall equal to or greater than produced by 85 percent of storms that have occurred in an area over a specified duration, based upon long-term historical records of local storm events.

Figure 2-9 Landscaping Plan



LANDSCAPE STATISTICS:

DESCRIPTION:	TOTAL
5 GAL TREES	2
15 GAL TREES	3
24" BOX TREES	41
TOTAL TREES:	46

PRELIMINARY PLANT PALETTE

Sunset Zone 24 / WUCOLS South Coastal Region

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	O.C. SPACING	WUCOLS
TREES AND PALMS					
CAL VIM	CALLISTEMON VIMINALIS	WEEPING BOTTLEBRUSH	15 GAL	STD.	L
CHA HUM	CHAMAEROPS HUMILIS VAR. ARGENTEA	BLUE ATLAS PALM	24" BOX	MULTI-TRUNK	L
CUP GOV	CUPRESSUS GOVENIANA SSP. GOVENIANA*	GOWEN CYPRESS	15 GAL		L
LAU NOB	LAURUS NOBILIS	BAY LAUREL	15 GAL	L.B.	L
LYO FLO	LYONOTHAMNUS FLORIBUNDUS SUBSP. ASPLENIFOLIUS*	CATALINA IRONWOOD	24" BOX	STD.	L
PRU LU	PRUNUS ILICIFOLIA SUBSP. LYONII*	CATALINA CHERRY	15 GAL	STD.	L
QUE TOM	QUERCUS TOMENTELLA*	ISLAND OAK	24" BOX	MULTI-TRUNK	L
SAL LAS	SALIX LASIOLEPIS*	ARROYO WILLOW	5 GAL		L
UMB CAL	UMBELLULARIA CALIFORNICA*	CALIFORNIA BAY	15 GAL	NATURAL	L
SHRUBS, GRASSES AND GROUNDCOVERS					
ACA ITE	ACACIA 'TEAPHYLLA	WILLOW WATTLE	5 GAL	6'-0" O.C.	L
ATR LEN	ATRIPLEX LENTIFORMIS*	SALTBUSH	1 GAL	4'-0" O.C.	VL
CAR BAR	CAREX BARBARAE*	SANTA BARBARA SEDGE	1 GAL	24" O.C.	L
CAR DIV	CAREX DIVULSA	BERKELEY SEDGE	4" POT	18" O.C.	L
CAR PAN	CAREX PANSA*	CALIFORNIA MEADOW SEDGE	4" POT	18" O.C.	L
CAR TUT	CAREX 'TUTTLE'	NATAL PLUM	5 GAL	4'-0" O.C.	L
CHO TEC	CHONDROPETALUM ELEPHANTINUM	LARGE CAPE RUSH	5 GAL	5'-0" O.C.	L
COT DAM	COTONEASTER DAMMERI 'CORAL BEAUTY'	PROSTRATE COTONEASTER	1 GAL	4'-0" O.C.	L
ENC CAL	ENCELIA CALIFORNICA*	COAST SUNFLOWER	1 GAL	4'-0" O.C.	VL
DIA REV	DIANELLA REVOLUTA 'BABY BLUES'	BABY BLUES FLAX LILY	1 GAL	24" O.C.	L
JUN PAT	JUNCUS PATENS*	CALIFORNIA RUSH	1 GAL	2'-0" O.C.	L
HET ARB	HETEROMELES ARBUTIFOLIA*	TOYON	15 GAL	6'-0" O.C.	L
LIP NOD	LIPPIA NODIFLORA	KURAPIA	FLAT	2'-0" O.C.	L
LEU SAF	LEUCADENDRON 'SAFARI GOLDSTRIKE'	YELLOW CONEBUSH	15 GAL	6'-0" O.C.	L
LEP REV	LEPTOSPERMUM REEVESII	DWARF TEA TREE	5 GAL	8'-0" O.C.	L
LYG SPA	LYGEUM SPARTUM	ESPARTO GRASS	1 GAL	30" O.C.	L
LOM LON	LOMANDRA LONGIFOLIA 'BREEZE'	DWARF MAT RUSH	5 GAL	4'-0" O.C.	L
LOM SEA	LOMANDRA 'SEASCAPE'	SEASCAPE MAT RUSH	1 GAL	30" O.C.	L
MUH DUB	MUHLENBERGIA DUBIA	PINE MUHLY	1 GAL	3'-0" O.C.	L
MYO PUP	MYOPORUM 'PUTAH CREEK'	PROSTRATE MYOPORUM	1 GAL	5'-0" O.C.	L
RHU INT	RHUS INTEGRIFOLIA*	LEMONADEBERRY	5 GAL	10'-0" O.C.	VL
SAM MEX	SAMBUCUS MEXICANA*	ELDERBERRY	5 GAL	7'-0" O.C.	L
WES MUN	WESTRINGIA 'MUNDI'	DWARF COAST ROSEMARY	5 GAL	36" O.C.	L
VINES & ESPALIERS					
VIT ROG	VITIS 'ROGERS RED' *	ROGERS RED GRAPE	5 GAL	TRAIN ON FENCE	L
NON IRRIGATED NATIVE HYDROSEED MIX					
	BROMUS CARINATUS 'CUCAMONGA'	CUCAMONGA BROME	SEED		VL
	FESTUCA MICROSTACHYS	SMALL FESCUE	SEED		VL
	TRIFOLIUM OLIGOLATUM	TREE CLOVER	SEED		VL
	ESCHSCOLTZIA CALIFORNYCA	CALIFORNIA POPPY	SEED		VL
	LUPINUS BICOLOR	BICOLOR LUPINE	SEED		VL

NOTE: SALS SEEDS SHALL PROVIDE FINAL HYDROSEED SEED AND SLURRY SPECIFICATIONS: (805) 684-0436

NOTES:
* = California Native
STD. = Standard
L.B. = Low Branch
"OR EQ." = Contractor to locate variety listed or equivalent variety within same species with similar characteristics. Similar characteristics include mature size, growth habit and color of foliage and flowers.
W.U.C.O.L.S. = Water Use Classification of Landscape Species. Jan. 2014. This is a guide to identifying irrigation water needs of landscape species and is intended for reference only.
All trees are to be selected and tagged by the Landscape Architect.
Contractor shall notify Landscape Architect a minimum four (4) weeks in advance of planting time.
Above-grade utilities shall be screened to the maximum extent feasible.
Plants listed as 'alert status' by the California Invasive Plant Council (CAL-IPC 2006) shall not be used for landscaping.

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2.6.7 Exterior Lighting

Proposed lighting at the project site would consist of a combination of exterior building-mounted wall packs and pole mounted fixtures in the proposed parking lot. All lighting would use light emitting diode (LED) fixtures and would include semi- and fully cut-off light fixtures. Lighting for the project site would be designed in accordance with the City and Federal Air Administration standards. Lighting design would be designed to minimize disruptions to wildlife movement. A photometric plan would be prepared for the project to ensure that light does not spill onto adjacent properties. All lighting would be designed to conform with Section 35-139 of the City zoning code.

2.6.8 Facilities Operations

The industrial warehouse building would be leased to a single or multiple tenants and would provide space for a variety of conforming uses allowed in accordance with the project site zoning, including indoor warehousing and storage, wholesaling and distribution, and construction and material storage. The industrial warehouse building would operate Monday to Saturday from 7:00am to 6:00pm. An estimated 75 employees would occupy the project site daily. As mentioned above, no specific tenant(s) have been identified to occupy this building at this time.

2.7 Construction and Grading

Construction of the proposed project is anticipated to begin in July 2027 and end in September 2028. Construction activities would include site preparation, grading, building construction, paving, architectural coating, and landscaping phases. Construction would occur Monday to Friday from 8:00 am to 5:00 pm. Construction staging would occur onsite, and construction personnel would park onsite. Construction debris would be hauled via United States Route 101 (U.S. 101) to the Tajiguas landfill, located at 14470 Calle Real in Goleta.

Development of the proposed project would require approximately 600 cubic yards (CY) of soil cut and approximately 38,000 CY of soil fill. Between 4 to 6 feet of fill would be used to elevate the proposed building above the 100-year floodplain elevation. In order to elevate the building on fill, the project would require 37,400 CY feet of soil to be imported to the site. Based on the recommendations of the *Revised Geotechnical Engineering Report Update* (Earth Systems Pacific 2023) prepared for the project, over excavation of approximately 11,400 CY of existing soils would be required below and within 5 feet of the proposed building footprint. It is the intent to recompact and reuse the excavated soil on-site prior to placing the imported fill. The nearest Class I landfill to Goleta is the Kettleman Hills landfill in Kettleman City in Kern County. Soil hauled to the site would be transported using 18 CY dump trucks with 16 CY transfer trailers. Approximately 1,100 dump trucks would be required to import the 37,400 CY of soil to the site.

Prior to construction, a 20 foot by 20 foot (400 sf) temporary staging area would be established in the San Jose Creek bed below the new storm drain outfall. Sandbag and plastic sheeting would be lowered by crane into the creek bed and a temporary cofferdam would be built in the 400 sf staging area in the creek bed to prevent water or the creek from entering the outfall construction area. The cofferdam would also prevent dirt, concrete rubble, and wet cement from coming into contact with surface water in the creek and prevent fish and other aquatic dependent species from entering the area during construction. No heavy equipment would be used or operated within this staging area in the creek bed. The materials (sandbags and plastic sheeting) used to create the temporary cofferdam from the staging area on the dirt access road or would be carried by hand approximately 25 feet by

labors from the end of the flood control department concrete lined access ramp to the staging area. Labor crews would use hand tools (i.e., shovels, rakes and brooms, dust pans and wheelbarrows) to collect and remove any debris that falls or washes into the staging area during installation of the buried storm drain outlet pipe and pipe outlet structure. The cofferdam installed in the creek bed staging area would remain in place for the duration of construction, and would be removed 10 to 15 days after the concrete has been poured on the creek bank at the detention basin outlet location to allow time for the concrete to cure before coming into contact with tidal surface water.

2.8 Project Objectives

The primary objectives for the proposed project are as follows:

- To develop a project with long-term viability through design by providing sufficient square footage with flexibility of interior size and arrangement for up to 4 tenant spaces with 6 loading docks.
- To develop a project with sufficient height (up to 35 foot maximum) to accommodate a variety of potential tenant needs that are consistent with the General Plan/Coastal Land Use Plan designation of Service/Industrial and zoning designation of Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL).
- Attract local employment opportunities in the industrial sector and generate new property tax revenue for the City.
- Optimize economically beneficial reuse of a previously developed, disturbed, and underutilized site within the City with existing infrastructure and access on a site that has significant land use limitations, including airport, hydrologic, and flooding constraints, that limit compatible uses on the site.
- Provide a permanent critical access easement to the flood channel for the City of Goleta and the Santa Barbara County Flood Control District.

2.9 Required Approvals

The proposed project requires City approval of the following:

- **Development Plan (17-121-DP).** Because the City does not have an adopted Local Coastal Program, the Development Plan must be reviewed and approved by the California Coastal Commission (CCC) following City review and action on the project. The City would evaluate and determine the Project's consistency with City policies and regulations. The proposed project would be required to obtain a Coastal Development Permit from the CCC. The CCC would evaluate the Project's consistency with State of California Coastal policies and regulations. Following discretionary approval from the CCC, the City has authority to effectuate the Coastal Development Permit and the Development Plan through issuance of a Land Use Permit (ministerial level).
- **Major Conditional Use Permit.** Grading and grubbing within 100 feet of the San Jose Creek ESHA requires a Major Conditional Use Permit.
- **Streamside Protection Area Reduction.** The City would have discretionary approval to determine if the requested Streamside Protection buffer reduction is warranted based on the criteria outlined in General Plan Policy CE 2.2. The California Coastal Commission would evaluate the reduction request against Coastal policies.

- **Demolition Permit.** The City would have ministerial approval over the issuance of a permit for the demolition of the existing freestanding movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box on the project site.
- **Building Permit.** The City would have ministerial approval over the issuance of a permit for the construction of the proposed warehouse industrial building.
- **Floodplain Manager Approval.** Prior to issuance of a development permit, the project would be required to obtain approval from the City Floodplain Manager for development within the 100-year floodplain.
- **Certificate of Acceptance.** Within 30 days of issuance of the City's discretionary permits, the property owner shall grant to the City and the City shall accept an easement for access to San Jose Creek .
- **General Plan Conformity Determination.** As required by Government Code section 65402, the City's planning commission must review and issue a report on the conformity of the aforementioned easement with the City's General Plan.

Other public agencies whose approval may be required include the following:

- **California Coastal Commission.** Approval of a Coastal Development Permit and the Streamside Protection Area buffer reduction.
- **California Department of Fish and Wildlife.** Prior to construction, the California Department of Fish and Wildlife permits may be required to be obtained for the construction of the proposed drainage outfall within San Jose Creek. The Applicant may at a minimum be required to obtain a Lake and Streambed Alteration Agreement for construction of the proposed drainage outfall.
- **Central Coast Regional Water Quality Control Board (RWQCB).** Prior to construction, the Central Coast RWQCB would require the proposed project to obtain a Water Quality Certification in accordance with Section 401 of the Clean Water Act for discharge to San Jose Creek. Discharge of dewatered groundwater to San Jose Creek would require coverage under the Central Coast RWQCB's *Waste Discharge Requirements National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges with Limited Threat to Water Quality;* Order No. R3-2022-0035, NPDES No. CAG99304. Based on the concentrations of chemical constituents of potentially contaminated groundwater, the Central Coast RWQCB may require that an individual National Pollution Discharge Elimination System (NPDES) permit and/or waste discharge requirements be obtained for dewatering activities.
- **Federal Aviation Administration.** Review of project details to determine consistency with airport safety regulations and issuance of a Determination of No Hazard to Air Navigation.
- **National Marine Fisheries Service.** Prior to construction of the proposed drainage outfall, the National Marine Fisheries Service would require the applicant to undergo federal Endangered Species Act Section 7 consultation for the potential presence of steelhead trout.
- **Santa Barbara County Flood Control District.** Prior to construction of the proposed drainage outfall, the Santa Barbara County Flood Control District would require the proposed project to obtain an encroachment permit for construction of the proposed drainage outfall.
- **Santa Barbara County Fire District.** The Santa Barbara County Fire district would provide site plan review and building safety inspection in accordance with Santa Barbara County Fire District standards.
- **State Water Resources Control Board (SWRCB).** Prior to construction, coverage would be obtained under the SWRCB's *General Permit for Stormwater Discharges Associated with*

Construction and Land Disturbance Activities, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit).

- **United States Army Corps of Engineers.** Prior to construction, the United States Army Corps of Engineers may require the proposed project to obtain a permit in accordance with Section 404 of the Clean Water Act for construction of the proposed drainage outfall.
- **United States Fish and Wildlife Service.** Prior to construction of the proposed drainage outfall, the United States Fish and Wildlife Service would require the applicant to undergo federal Endangered Species Act Section 7 consultation for the potential presence of tidewater goby.
- **Goleta Sanitary District.** Prior to construction, the Goleta Sanitary District would require the project to obtain a Sewer Connection Permit.
- **Goleta Water District.** Prior to construction, the Goleta Water District would require the project to obtain a Can and Will Serve Letter.

3 Environmental Setting

This section provides a general overview of the environmental setting for the project site. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The project site is located in the Goleta Valley. The Goleta Valley is a coastal plain bounded by the Santa Ynez Mountains to the north and the Pacific Ocean to the south. The Goleta Valley is characterized by rolling hills, oak woodlands, native and non-native grasses, chaparral, and beaches. The area has been subject to geologic uplift, as evidenced by its coastal bluffs. Much of the Goleta Valley is rural in nature, characterized by uses such as grazing, open space, and agriculture. Developed areas in the Goleta Valley include the City of Goleta and the City of Santa Barbara.

Water features in the Goleta Valley includes San Jose Creek, Old San Jose Creek, San Pedro Creek, Atascadero Creek, Tecolote Creek, Bell Canyon Creek, El Encanto Creek, and the Goleta Slough. With the exception of Bell Canyon and Tecolote creeks, the creeks present within the City of Goleta drain to the Goleta Slough and the Devereux Slough.

The Goleta Valley's Mediterranean climate is characterized by warm, dry summers and cool, damp winters with occasional rainy periods. Annual rainfall is approximately 18 inches of rain with nearly all precipitation occurring between October and April. Light to moderate sea breezes blow west to east.

3.2 Project Site Setting

The project site is located at 907 South Kellogg Avenue (Assessor's Parcel Number [APN] 071-190-035) in the City of Goleta. The project site was historically used as a drive-in movie theater and still contains structures and facilities from that former use, including the screen, a concessions building, and associated paved parking. In addition, a public market was previously hosted on Sundays on the project site. Operations of the public market and drive in theater ceased in September 2022.

The project site is bordered by San Jose Creek and State Route (SR) 217 to the southeast. Residential properties are located beyond SR 217 to the east. Industrial development is located to the north and west of the project site. Undeveloped land with existing vegetation consisting of trees and shrubs is located approximately 260 feet northwest of the project site and 30 feet southwest of the project site. Tidal wetland and stormwater infrastructure is located to the south of the project site.

The project site elevation is approximately 20 feet above mean sea level. Soils on the project site consist of Camarillo fine sandy loam. Stormwater runoff discharges to the San Jose Creek adjacent to the eastern border of the project site. The San Jose Creek discharges into the Goleta Slough and Pacific Ocean, located approximately 0.45-mile south of the project site.

The project site is within the Coastal Zone. The entirety of the project site is within a flood hazard zone area (Zone A), as defined by the Federal Emergency Management Agency (FEMA) and within an area subject to future sea level rise. The project site is within the inundation zone for the Rancho Del Ciervo dam. San Jose Creek, located along the eastern project site boundary, is designated as

riparian/marsh/vernal pool Environmentally Sensitive Habitat Area (ESHA) in the Conservation Element of the City's General Plan. Land adjacent to the southwestern boundary of the project site is also identified as ESHA.

3.3 Cumulative Development

A project's cumulative impacts are the possible environmental effects that are individually limited but cumulatively considerable. Section 15065[a][3]) of the CEQA Guidelines states that: *"Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.* Section 15355 of the CEQA Guidelines states that: *"Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts:*

a. *The individual effects may be changes resulting from a single project or a number of separate projects.*
b. *The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

According to Section 15130 of the CEQA Guidelines, the discussion of cumulative impacts must reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects that do not contribute to the cumulative impact. Impacts that do not result in part from the project evaluated in an Environmental Impact Report (EIR) need not be discussed.

The impact subsections of Section 4 of this EIR discuss the potential cumulative environmental impacts resulting from the project in association with other planned, pending, and reasonably foreseeable projects in the vicinity of the project area. The list of cumulative projects considered in this analysis was based on planned, pending, and reasonably foreseeable projects at the time of the Notice of Preparation in April 2023. Projects proposed following the release of the Notice of Preparation in April 2023 are not considered.

Table 3-1 lists the planned, pending, and reasonably foreseeable projects considered for the purposes of the cumulative analyses within this EIR. These projects are located within Goleta and include developments listed in the City's cumulative projects list, projects detailed on the City's website, and projects in Goleta requiring approval from the California Coastal Commission. Each cumulative project considered within this EIR has, at a minimum, begun the process of completing a development application.

As detailed in Table 3-1 and summarized herein, cumulative projects include construction of a total of 469 residential units, 405,404 square feet of industrial space (storage facilities, warehouses, distribution and delivery facilities, and building additions and renovations), and 116,274 square feet of commercial space (office space, car dealership facilities, and a golf course clubhouse). Cumulative projects also include an 11,600 square foot fire station, a 5.88-acre battery storage facility, 8,231 square foot synagogue and storage building, three habitat restoration projects on approximately 402 acres, four oil and gas infrastructure removal projects, and several infrastructure improvements.

Table 3-1 Cumulative Projects List

Project Name	APN	Project Description	Distance from Project Site	Status
Caltrans San Jose Creek Bridge Replacement	–	Replacement of existing Highway 217 bridge and bicycle/pedestrian path over San Jose Creek	1.2 miles north	Under Construction
Ellwood Butterfly Habitat Management Plan Implementation	079-210-013, - 014, -015, -019, -024, -070, - 071, and -072	Implement management program to restore Monarch aggregation sites, enhance biodiversity, and maintain public access, and other management plan activities	3.7 miles west	Under Construction
Ellwood Tree Safety Emergency Permit and Ellwood North Restoration	079-210-069	Emergency Tree Removal for safety reasons by habitat enhancements in monarch butterfly aggregation sites	3.8 miles west	Under Construction
Beach Hazards Removal	079-200-012, - 013, 079-210- 059, -069, -013, -014, and, -015	Removal of remnant oil and gas infrastructure hazards along City coastline	5.3 miles west	Under Construction
Platform Holly Decommissioning	–	Plug and abandon 32 existing oil wells	5.1 miles southwest	Under Construction
130 Robin Hill Road Site Improvements	073-050-015	768-square foot (sf) elevator addition, and 314-sf addition to rear of building, plus a 1,100-sf new building	1.1 miles northwest	Under Construction
GVCH DPRV New Rehabilitation Pool/Center	065-090-022	Interior remodel of the main hospital building and the construction of an aquatic facility in the southern parking lot	1.0 miles east	Under Construction
Heritage Ridge	073-060-031 through -043	104 Affordable and 2 caretaker units, and 228 Market Rate apartments	1.6 miles northwest	Under Construction
SB Humane Campus Renovation	071-220-031, - 036, -024	GPA (City Council initiated October 18, 2022) to change from I-G to C-G, Zoning Amendment, DP, CUP for Kennel use, Voluntary Lot Merger, and DRB approval for a SB Humane campus renovation. Project includes replacing all existing buildings (10 buildings and 1 barn) except the education building (renovation only) and relocating historic Beck House on-site (remove non-historic addition). Applicant requests a parking reduction from 79 required spaces to 65. Grading includes 3,200 cy of cut, 280 cy of fill, and 2,920 cy of export. Of the 56 existing trees, 36 trees are proposed for removal, 1 is proposed to be relocated, and 19 will be protected in place. 67,517 square feet of landscaping is proposed	1.2 miles northeast	Under Construction
Ekwill Street and Fowler Street Road Extension	–	Construct a new road, the Ekwill Street extension, and extend the existing South Street to connect to Technology Drive and rename it Fowler Road. Construct two roundabouts at the Pine Avenue intersection with Ekwill Street and at the Hollister Avenue and State Route 217 ramp intersections to improve intersection capacity	70 feet north	Under Construction
Hollister Avenue Bridge Relocation	071-090-036, -037, -089; 071-140-046, -056, -058; 071-260-CA1	Replace existing Hollister Avenue Bridge over San Jose Creek	0.75-mile northeast	Under Construction
Goleta Battery Energy Storage Facility	073-140-027	New 60 megawatt (240 megawatt hour) battery energy storage facility; lot split into two lots	2.5 miles northwest	Construction Completed
PRC 421 Piers	079-210-059	Plug and abandon 2 existing oil wells, remove piers, infrastructure, and access roadway	4.6 miles west	Construction Completed
Kellogg Crossing Self Storage (Formerly Schwan Self Storage)	071-090-082	New 136,067 SF self storage facility containing 1,043 units	1.1 miles north	Construction Completed
Security Paving (former Highway Recycling)	071-190-034	Concrete and asphalt recycling facility with temporary and permanent equipment. Includes creek/SPA restoration, fencing, landscaping, trash enclosure, retaining wall, and drainage improvements	100 feet north	Construction Completed
Bacara Beach House Relocation	079-200-013,079-200-012	Demolition of existing beach house and relocating/constructing new beach house	5.3 miles west	Construction Completed
San Jose Creek Multipurpose Path Project	071-090-047, -048, -074, -082, -083, -084; 071-010-010; -011; 071-350-007; State Route 217	Provide continuous connectivity through two separate multipurpose path segments which provide a path from Calle Real to the Atascadero Creek Bikeway	150 feet east	Approved
SoCal Gas Public Safety Projects	–	Removal and replacement of two above-ground natural gas pipelines and support structures within the La Goleta Storage Facility	0.5-mile south	Approved
Ellwood Mesa Coastal Trails and Habitat Restoration Project	079-210-024, -069, -015, -014, -013, -072, -071, and -070	Improve 7.1 miles of trails, improve 3 drainage crossings, improve 2 beach access points, and 13 acres of habitat restoration	3.7 miles west	Approved
Distribution/Delivery Facility	073-610-036	Application for a Project Clearance within the Cabrillo Business Park Specific Plan area for a new 54,080 square foot distribution/delivery facility	2.1 miles west	Approved
New 7,390-sf Synagogue	077-140-044	New 7,390 SF Synagogue and 841 SF storage building, with sanctuary, event hall, office spaces, and kitchen. Revised parking, landscaping, and hardscaping also included	1.6 miles north	Approved
Santa Barbara Corporate Center Office and R and D Building	071-140-075	New parcel map with a 14,000 square foot office and R and D building, and other associated improvements	0.85-mile northeast	Approved
Seymour Duncan Office and R and D Buildings	071-140-075	New parcel map with a 34,002 square foot office and R and D building, and other associated improvements	0.90-mile east	Approved

Project Name	APN	Project Description	Distance from Project Site	Status
Honda Dealership zoning clearance effectuating Development Plan No. 19- 073-DP	071-140-085	New showroom addition and canopy structures totaling 6,860 sq. ft. and associated site improvements	0.55-mile northeast	Approved
Toyota Dealership zoning clearance effectuating Development Plan No. 19- 074-DP.	071-140-083	3,000 service bay and associated site improvements	0.67-mile northeast	Approved
GVCH DPAM for Permanent Hollipat Parking Lot	065-090-028	Approve the existing, temporary parking lot for permanent use.	1.1 miles east	Approved
Storke Medical Center	073-440-026	Specific Plan Amendment to remove parcel from Camino Real Market Plan SP and request for Development Plan for two medical office buildings of 18,600 sq. ft. each with accessory child care in 2,113 sq. ft. of the westerly building	2.5 miles west	Approved
14 Residential Unit Mixed Units	077-160-066	The proposed project at 6491 Calle Real is for new mixed-use development on a vacant 0.53-acre lot. The development would comprise 14 one-bedroom residential units, ranging in size from 587 to 869 square feet, and one commercial office space of 585 square feet. The lot is located on the southeast corner of the Calle Real/Los Carneros roundabout and is zoned Office Institutional (OI)	1.7 miles northwest	Approved
Fire Station 10	079-210-075	Construction of an 11,600 square foot fire station	4.4 miles west	Pending Building Department Review
Shelby Residential Project	077-530-019	60 residential units	3.6 miles northwest	Pending/Complete application/EIR circulated – No action taken as project is on hold waiting for water allocation
Kenwood Village	077-130-066, -019; 077-141- 049	60 residential units	2.9 miles northwest	Pending Complete Application/ EIR circulated – No action taken as project is on hold waiting for water allocation
San Jose Creek Fish Passage Project	071-190-017, -039; 071-170-086, -036; 071-140-060, -080	Redesign, maintenance, and repair of existing weirs within a concrete channel within San Jose Creek	40 feet east	Pending – Requires additional permitting
Hangar 5 Relocation	073-150-025	The applicant intends to develop the vacant portion of APN 073-150-025 with a re-purposed two-story hangar building totaling 17,912 square feet. The hangar building would be relocated to the subject property from Airport property at 500 Fowler Rd, Santa Barbara, CA	2.0 miles west	Pending – environmental review anticipated to be initiated in August 2024
Auto Service Bay Addition and Conversion	069-110-054	Proposed changes include a build-out/addition to the floor area of the existing 1,757 sf service station of 779 sf and the addition of a trash enclosure of 119 sf, for a total building coverage of 2,655 sf. Tenant improvements include interior improvements and removal of the service bays, installation of new roofing, windows doors and exterior finish. Two additional parking spaces to be provided, for a total of 10, with one ADA space within the 10 ft. setback. New landscaping to be provided	1.1 miles north	Pending – Incomplete Application
Willow Industrial Park	071-170-079, -080, -083	212,670 contraction storage yard using crushed asphalt surface and removal of approximately 32,000 sq. ft. of crushed asphalt from SPA buffer area placed without permits	100 feet north	Pending – Incomplete Application
Sandpiper Golf Course	079-210-059	The proposed project includes constructing a new 16,019 square foot clubhouse with a turf roof, redesigning the existing 18-hole golf course, including reducing the golf turf footprint in favor of a native plant palette, restoring the Barnsdall Gas Station to repurpose it as a coffee shop, replace and upgrade an existing comfort station located on the golf course, replace and upgrade the existing maintenance facilities, and provide Improvements along Hollister Avenue, including revising entry points, a new public trail, underground electrical lines, relocating the bus station, and providing curb and sidewalk improvements	4.2 miles west	Pending – environmental review anticipated to be initiated in August 2024

Source: California Coastal Commission 2022; California Coastal Commission 2021; City of Goleta 2023a-2023d; City of Goleta 2022

4 Environmental Impact Analysis

This section discusses the possible environmental impacts of the proposed project for specific issue areas that were identified through the Notice of Preparation and scoping process as having the potential to experience significant effects.

A "significant effect" is defined by the *CEQA Guidelines* Section 15382 as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are the criteria and thresholds adopted by the City. The analysis relies on the significance thresholds from Appendix G of the *CEQA Guidelines* and the County of Santa Barbara's *Environmental Thresholds and Guidelines Manual*, which have been adopted by the City of Goleta.[1] Where appropriate, the analysis also relies on criteria and thresholds adopted by other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Class I, Significant and Unavoidable**. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the *CEQA Guidelines*.
- **Class II, Less than Significant with Mitigation Incorporated**. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.
- **Class III, Less than Significant**. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **Class IV, Beneficial:** An impact that would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis

[1] In 2008, the City adopted the County's 2002 *Environmental Thresholds and Guidelines Manual* (published May 1992, last revised in October 2002). Since adoption by the City, the County has revised the *Environmental Thresholds and Guidelines Manual* multiple times to reflect changes to the State *CEQA Guidelines*. For consistency with current CEQA requirements, the analysis in this EIR relies on the most current County *Environmental Thresholds and Guidelines Manual* published in January 2021.

concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*.

4.1 Aesthetics

This section evaluates the project's potential impacts to aesthetic and visual resources within and adjacent to the project site.

4.1.1 Environmental Setting

a. Visual Character and Scenic Resources

The project site is an 11.77-acre area located in the City of Goleta, Santa Barbara County, California. The project site is bounded by State Route (SR) 217 and San Jose Creek to the southeast. Residential properties are located beyond SR 217 to the east. Industrial uses are located to the north and west. Tidal wetland and stormwater infrastructure are located to the south, undeveloped land with existing trees and shrubs are located approximately 30 feet to the southwest, and undeveloped land with existing trees and shrubs approximately 260 feet away to the northwest.

The project site is primarily flat and contains degraded asphalt, with a row of trees on the southwestern border of the project site. Existing buildings on the project site include a non-operational, drive-in theater including an approximately 3,663-square-foot concessions building. ticket booths, and a vacant, approximately 200-square-foot building. The interior of the project site is enclosed with fencing, with native and ruderal vegetation growing along the fence perimeter. A paved access road connects the project site to South Kellogg Avenue. Vegetation is present on both sides of the access road, with denser and more mature vegetation occurring along the eastern boundary of the project site, adjacent to SR 217.

Figure 4.1-1 presents representative photos of the project site's existing visual character, including primary visual features, when entering the project site (Photograph 1) and exiting the project site (Photograph 2), as well as views of the drive-in theater (Photograph 3) and the existing, vacant building (Photograph 4). The project site does not contain major visual resources, including surface waters, elevation, or other natural or man-made features; however, San Jose Creek is located adjacent to the project site to the southeast.

Figure 4.1-2 presents representative photos of project site views of the surrounding area. Looking south from the project site, views of the Pacific Ocean are obscured by intervening buildings and vegetation (Photographs 1 and 2). Looking north from the project site, views of the Santa Ynez Mountains and foothills are visible from the project site (Photographs 3 and 4).

The project site is mainly unpaved, with vegetation surrounding the perimeter of the project site, and offers views of open space. Specifically, the project site offers largely unobstructed views to the north of the Santa Ynez Mountains and nearby foothills, as shown in Figure 4.1-2 (Photographs 3 and 4). Pursuant to Policy VH 1.1 in the Visual and Historic Resources Element of the Goleta General Plan, the City has designated the Santa Ynez Mountains and foothills as scenic resources. The project site does not offer views to the south of the Goleta coastline and Pacific Ocean, both of which are also designated scenic resources (City of Goleta 2006). The project site itself is not designated as a scenic resource.

Figure 4.1-1 Project Site Visual Character



Photograph 1. View of the perimeter fencing, vegetation, and the drive-in theater in the background, when entering the project site.



Photograph 2. View of the perimeter fencing and vegetation, when exiting the project site.



Photograph 3. View of the existing drive-in theater screen, with background vegetation, facing east.



Photograph 4. View of the existing building, facing west.

Figure 4.1-2 Project Site Views



Photograph 1. View looking south. Vegetation obscures views of the Pacific Ocean and SR-217 from the project site.



Photograph 2. View looking south-southwest. Vegetation obscures views of the Pacific Ocean from the project site.



Photograph 3. View looking northwest. The Santa Ynez Mountains and foothills are clearly visible from the project site.



Photograph 4. View looking north. The Santa Ynez Mountains and foothills are clearly visible from the project site.

b. Scenic Corridors

The California Department of Transportation (Caltrans) designates highways throughout California as scenic highways. For a highway to be declared as scenic, the government with jurisdiction over the abutting land must adopt a "scenic corridor protection program" that limits development, outdoor advertising, and earthmoving around the highway. U.S. 101, approximately 0.9 mile north of the project site, is eligible for state designation as a scenic highway (Caltrans 2018).

The City's Visual and Historic Resources Element identifies U.S. 101, SR 217, and Hollister Avenue, all of which are in the vicinity of the project site, as local scenic corridors. The City defines local scenic corridors as roadways that pass through, or provide visual access to, areas of high scenic value (City of Goleta 2006).

Although the project site itself does not contain any designated scenic corridors, it is located directly adjacent to the SR 217 scenic corridor and within the vicinity of the U.S. 101 and Hollister Avenue scenic corridors. The centerline of U.S. 101 is approximately 0.9 mile north of the project site, Hollister Avenue is approximately 0.7 mile northwest of the project site, and SR 217 is located directly adjacent to the east/southeast of the project site. These scenic corridors in the vicinity of the project site are designated and protected pursuant to Policies VH 1.1, VH 2.2, and VH 2.3 and Figure 6.1 in the City of Goleta's General Plan (City of Goleta 2006). Views of the project site, as experienced from designated local scenic corridors, are discussed below.

Views from U.S. 101 Mainline

As a local scenic corridor throughout Goleta, U.S. 101 provides scenic views from the roadway to surrounding areas. U.S. 101 is located 0.9 mile to the north of the project site; intervening buildings and vegetation completely obstruct southward views of the project site.

Views from SR 217

SR 217 is designated as a local scenic corridor and is adjacent to the project site's eastern/southeastern boundary. While vegetation provides some visual screening along SR 217, existing buildings on the project site are visible to vehicles travelling in either direction along SR 217. Additionally, northbound travelers on SR 217 experience scenic views of the Santa Ynez Mountains, and southbound travelers on SR 217 experience scenic views of the Pacific Ocean and Goleta coastline. Photograph 1 in Figure 4.1-3 and Figure 4.1-4 depict existing views of the project site from the SR 217 local scenic corridor.

Views from Hollister Avenue

Hollister Avenue is designated as a local scenic corridor and is approximately 0.7 mile northwest of the project site's western boundary. Intervening buildings and vegetation completely obstruct eastward and southward views of the project site.

Figure 4.1-3 Project Site Existing and Simulated Views from SR 217 Facing West



Photograph 1. Existing westward view of the project site from SR 217. Vegetation obscures most of the project site.



Photograph 2. Simulated westward view of the existing project site from SR 217 with visual simulation of the proposed industrial building and landscaping.

Figure 4.1-4 Project Site Proposed and Simulated Views from Northbound SR 217



Photograph 1. Existing northbound view of the project site from SR 217. Exising drive-in theater structures on the project site are visible above the vegetation.



Photograph 2. Northbound view of the project site from SR 217 with visual simulation of the proposed industrial building.

c. Scenic Views

In addition to scenic corridors, the Goleta General Plan designates scenic viewpoints, which are designated locations with protected views or vistas. The project site is not designated as or located adjacent to a protected scenic view, as identified by the Goleta General Plan (City of Goleta 2006). However, scenic viewpoints in the vicinity of the project site are discussed below. Views from locally designated scenic corridors, including U.S. 101, SR 217, and Hollister Avenue, are discussed in the above subsection, "Scenic Corridors".

Hollister Avenue (Between Rutherford Street and South Kellogg Avenue) Scenic Viewpoint

The Goleta General Plan identifies a north-facing scenic viewpoint on Hollister Road, north of the project site. Considering this viewpoint is directed towards scenic views of the Santa Ynez Mountains and foothills, the project site would not be visible from this viewpoint.

SR 217 and Hollister Avenue Intersection Scenic Viewpoint

The Goleta General Plan identifies a scenic viewpoint at the intersection of Hollister Avenue and SR 217, northeast of the project site. This viewpoint provides both north-facing scenic views of the Santa Ynez Mountains, and south-facing scenic views of the Pacific Ocean. Intervening buildings and vegetation obstruct the project site from southward-facing views, and the project site would not be visible in northward-facing views, given the orientation of the public viewpoint towards the foothills and mountains.

Other Public Road View Corridors

The project site is fully visible from several other nearby public roads that are not designated as scenic corridors or do not contain scenic viewpoints, including Kellogg Avenue and South Fairview Avenue. Kellogg Avenue is directly north of the project site, and South Fairview Avenue is located to the west of the project site. Figure 4.1-5 depicts views of the existing project site from Kellogg Avenue (Photograph 1). Figure 4.1-6 depicts views of the existing project site from South Fairview Avenue (Photograph 1).

d. Existing Light and Glare Conditions

The project site is currently primarily undeveloped. On-site sources of illumination come from two sets of pole-mounted halogen lights. One set is located at the northeastern side of the concessions building, and one set is located at the western side of the concessions building; both of these sources illuminate the patio area around the concessions building. Additionally, there are two halogen lights on the northern projection room, facing the movie screen. These lights are operable and were used to light the parking lot after the end of movies; however, the lights are typically not currently in use since the drive-in theater is no longer in operation. The project site does not contain other lighting sources.

The project site also receives indirect lighting from off-site sources of industrial and residential development that are adjacent to the site, as well as adjacent roadways. Off-site sources include streetlamps, light fixtures along building exteriors, light emanating from windows, and headlights from passing vehicles on SR 217 or from vehicles entering/exiting parking lots of neighboring buildings.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use. Existing sources of glare on the project site include the inactive drive-in theater screen as well as sunlight reflecting from light-colored building materials and glass within existing structures.

Figure 4.1-5 Project Site Existing and Simulated Views from Kellogg Avenue



Photograph 1. Existing southward view of existing project site from Kellogg Avenue. The project site is directly visible from this roadway.



Photograph 2. Simulated southward view of project site from Kellogg Avenue, including the visual simulation of the proposed building.

Figure 4.1-6 Project Site Existing and Simulated Views from South Fairview Avenue



Photograph 1. Existing eastward view of existing project site from South Fairview Avenue. Vegetation completely obstructs views of the site.



Photograph 2. Simulated eastward view of project site from South Fairview Avenue, including the visual simulation of the proposed building.

4.1.2 Regulatory Setting

a. State Regulations

State Scenic Highway Program

Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. U.S. 101 is eligible for designation throughout Santa Barbara County, but is not designated as a State Scenic Highway in the vicinity of the project site (Caltrans 2018).

California Coastal Act

The California Coastal Act, enacted in 1976, establishes procedures for the review of proposed developments in the Coastal Zone and policies for the protection of coastal resources and public access to the coastline. The project site is located in the Coastal Zone, therefore, Section 30251, Scenic and visual qualities, of the California Coastal Act pertains to aesthetics of the project.

> **Section 30251, Scenic and visual qualities**: The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas, such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government, shall be subordinate to the character of its setting.

b. Local Regulations

Goleta General Plan

The City of Goleta's Visual and Historic Resources Element of the General Plan (2006) outlines several goals and policies related to the aesthetics of development and preservation of scenic resources. Policies that are relevant to the project include:

- **Policy VH 1.1: Scenic Resources.** An essential aspect of Goleta's character is derived from the various scenic resources within and around the city. Views of these resources from public and private areas contribute to the overall attractiveness of the city and the quality of life enjoyed by its residents, visitors, and workforce. The City shall support the protection and preservation of the following scenic resources:
  a. The open waters of the Pacific Ocean/Santa Barbara Channel, with the Channel Islands visible in the distance.
  b. Goleta's Pacific shoreline, including beaches, dunes, lagoons, coastal bluffs, and open costal mesas.
  c. Goleta and Devereux Sloughs.
  d. Creeks and the vegetation associated with their riparian corridors.
  e. Agricultural areas, including orchards, lands in vegetable or other crop production, and fallow agricultural lands.

f. Lake Los Carneros and the surrounding woodlands.

g. Prominent natural landforms, such as the foothills and the Santa Ynez Mountains.

- **Policy VH 1.4: Protection of Mountain and Foothill Views.** Views of mountains and foothills from public areas shall be protected. View protection associated with development that may affect views of mountains or foothills should be accomplished first through site selection and then by use of design alternatives that enhance, rather than obstruct or degrade, such views. To minimize structural intrusion into the skyline, the following development practices shall be used where appropriate:
  a. Limitations on the height and size of structures.
  b. Limitations on the height of exterior walls (including retaining walls) and fences.
  c. Stepping of buildings so that the heights of building elements are lower near the street and increase with distance from the public viewing area. Increased setbacks along major roadways to preserve views and create an attractive visual corridor.
  d. Downcast, fully shielded, full cut off lighting of the minimum intensity needed for the purpose.
  e. Limitations on removal of native vegetation.
  f. Use of landscaping for screening purposes and/or minimizing view blockage as applicable.
  g. Revegetation of disturbed areas.
  h. Limitations on the use of reflective materials and colors for roofs, walls (including retaining walls), and fences.
  i. Selection of colors and materials that harmonize with the surrounding landscape.
  j. Clustering of building sites and structures.

- **Policy VH 2.2: Preservation of Scenic Corridors.** The aesthetic qualities of scenic corridors shall be preserved through retention of the general character of significant natural features; views of the ocean, foothills, and mountainous areas; and open space associated with recreational and agricultural areas including orchards, prominent vegetation, and historic structures. If landscaping is used to add visual interest or for screening, care should be taken to prevent a wall-like appearance. Bridges, culverts, drainage ditches and other roadway ancillary elements should be appropriately designed; side slopes and earthen berms adjacent to roadways should be natural in appearance.
- **Policy VH 2.3 Development Projects Along Scenic Corridors.** Development adjacent to scenic corridors should not degrade or obstruct views of scenic areas. To ensure visual compatibility with the scenic qualities, the following practices shall be used, where appropriate:
  a. Incorporate natural features in design.
  b. Use landscaping for screening purposes and/or for minimizing view blockage as applicable.
  c. Minimize vegetation removal.
  d. Limit the height and size of structures.
  e. Cluster building sites and structures.
  f. Limit grading for development including structures, access roads, and driveways. Minimize the length of access roads and driveways and follow the natural contour of the land.
  g. Preserve historical structures or sites.
  h. Plant and preserve trees.

i. Minimize use of signage.
j. Provide site-specific visual assessments, including use of story poles.
k. Provide a similar level of architectural detail on all elevations visible from scenic corridors.
l. Place existing overhead utilities and all new utilities underground.
m. Establish setbacks along major roadways to help protect views and create an attractive scenic corridor. On flat sites, step the heights of buildings so that the height of building elements is lower close to the street and increases with distance from the street.

- **Policy VH 3.4: Building Design.** The city's visual character shall be enhanced through development of structures that are appropriate in scale and orientation and that use high quality, durable materials. Structures shall incorporate architectural styles, landscaping, and amenities that are compatible with and complement surrounding development.
- **Policy VH 4.1: Lighting.** Outdoor lighting fixtures shall be designed, located, aimed downward or toward structures (if properly shielded), retrofitted if feasible, and maintained in order to prevent over-lighting, energy waste, glare, light trespass, and sky glow. The following standards shall apply:
  a. Outdoor lighting shall be the minimum number of fixtures and intensity needed for the intended purpose. Fixtures shall be fully shielded and have full cut off lights to minimize visibility from public viewing areas and prevent light pollution into residential areas or other sensitive uses such as wildlife habitats or migration routes.
  b. Direct upward light emission shall be avoided to protect views of the night sky.
  c. Light fixtures used in new development shall be appropriate to the architectural style and scale and compatible with the surrounding area.

- **Policy VH 4.6: Industrial Areas.** The following standards shall be applicable to industrial development (see related LU 4.2):
  a. All structures shall be designed to be compatible with adjacent development relative to size, bulk, and scale.
  b. Where residential or commercial uses exist adjacent to industrial properties, such areas shall be buffered from industrial uses by increased setbacks and heavily landscaped screens.
  c. Transfer of noise off-site shall be minimized by the use of screen walls, acoustical enclosures, or building placement. Noise generating activities shall be located as far as possible from nonindustrial uses.
  d. All outdoor storage or maintenance areas shall be screened. Landscaping may be used alone or in conjunction with fencing or walls.
  e. Loading areas and recycling and trash facilities shall be easily accessed and screened from view with landscaping and/or fencing or walls. Adjacent uses shall be considered when siting such areas.
  f. Roof-mounted equipment shall be screened and considered as part of the structure for height calculations.
  g. Architectural detailing shall be used to break up the box-like appearance of construction typically used for industrial buildings.
  h. Adequate lighting shall be provided for security and safety purposes but designed to prevent encroachment onto adjacent uses, wildlife habitats, or the night sky.
  i. Sufficient, secure, and protected bicycle parking shall be provided.

j. Public transit shall be encouraged through effective placement of stops for local and regional transit services. Existing stops shall be upgraded as appropriate.

- **Policy VH 4.9: Landscape Design**. Landscaping shall be considered and designed as an integral part of development, not relegated to remaining portions of a site following placement of buildings, parking, or vehicular access. Landscaping shall conform to the following standards:
  a. Landscaping that conforms to the natural topography and protects existing specimen trees is encouraged.
  b. Any specimen trees removed shall be replaced with a similar size tree or with a tree deemed appropriate by the City.
  c. Landscaping shall emphasize the use of native and drought-tolerant vegetation and should include a range and density of plantings including trees, shrubs, groundcover, and vines of various heights and species.
  d. The use of invasive plants shall be prohibited.
  e. Landscaping shall be incorporated into the design to soften building masses, reinforce pedestrian scale, and provide screening along public streets and off street parking areas.

Please see Section 4.10, *Land Use and Planning*, for a comprehensive discussion of applicable goals and policies.

Goleta Coastal Zoning Ordinance

In accordance with Section 17.01.040(E)(4) of the Goleta Municipal Code (GMC), the applicant and the City of Goleta (City) have entered into a Development Agreement (and approved by the Coastal Commission on April 6, 2022). Approval of the Development Agreement was exempt from CEQA based on the statutory common-sense exemption (CEQA Guidelines Section 15061[b][3]) and that there would be no physical change in the environment (CEQA Guidelines Section 15060[c][2]). The Development Agreement permits to continue the use of prior zoning standards until either the date the City obtains a certified Local Coastal Program or December 31, 2023, whichever occurs earlier.

Because of the adopted Development Agreement, the project is subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code) rather than the City's current zoning code and uses all of the previous regulations and procedures in place prior to the adoption of Title 17. Therefore, Sections 35-84A and 35-85 of the City's prior Coastal Zoning Ordinance would apply to the project. The southern two-thirds of the site is zoned Light Industry (M-1) and the northern third of the site is zoned Service Industrial-Goleta (M-S-GOL).

Section 35-84A of the City's previous Coastal Zoning Ordinance provides development standards for M-S-GOL zone, including permitted uses, setback sizes, height limits, performance standards, and parking/landscaping requirements.

Section 35-85 of the City's previous Coastal Zoning Ordinance provides development standards for the M-1 zone, including permitted uses, setback sizes, height limits, building coverage limits, performance standards, and parking/landscaping requirements.

4.1.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

This section evaluates the existing visual resources compared to the proposed development, analyzing the nature of the anticipated change and its compatibility with the visual character of the area. Assessing aesthetic impacts of a project is inherently subject to personal and cultural interpretation; therefore, this analysis uses the County's 2021 *Environmental Thresholds and Guidelines Manual* to direct the assessment of aesthetic impacts.

To assess the aesthetic impacts of a project, visual resources on the project site, visual resources in areas surrounding the project site, and public views that include the project site must be evaluated, including the physical attributes of the project site, its relative visibility, and its relative uniqueness. Regarding visibility, within Goleta, four types of areas are especially important: coastal and mountainous areas, the urban fringe, and travel corridors.

Once visual resources on the project site have been evaluated, the potential impacts of the project on visual resources views in the project vicinity must be determined. Additionally, a determination of compliance with local policies pertaining to visual resources is included in the aesthetics assessment.

Consistent with the requirements for evaluating visual resources described in the State CEQA Guidelines, all views discussed herein refer to public views.

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. Pursuant to Appendix G, potentially significant impacts would occur if development of the project site would:

1. Have a substantial adverse effect on a scenic vista;
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings; in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality; or
4. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project have a substantial adverse effect on a scenic vista?

Impact AES-1 THE PROPOSED INDUSTRIAL BUILDING ON THE PROJECT SITE WOULD HAVE A HEIGHT OF 35 FEET AS MEASURED FROM FINISHED GRADE, WHICH WOULD AFFECT NORTHWARD SCENIC VIEWS OF THE SANTA YNEZ MOUNTAINS AND FOOTHILLS EXPERIENCED BY TRAVELERS ON STATE ROUTE (SR) 217. THIS IMPACT WOULD BE CLASS I, *SIGNIFICANT AND UNAVOIDABLE*.

The project would construct an approximately 70,594-square-foot "high-cube" industrial building on the northeastern-most portion of the project site. Approximately 4 to 6 feet of fill would be used to elevate the proposed building to meet flood plain elevation requirements, and the building itself would have a height of 35 feet from finished grade. This would result in the total height of the structure of approximately 39 to 41 feet above existing grade, which would be consistent with height limits of the M-S-GOL and M-1 zones, pursuant to the City's previous Coastal Zoning Ordinance. The proposed industrial building would include aesthetic features such as architectural detailing and landscaping, which would reduce building massing and integrate the proposed building with natural areas of vegetation growing along SR 217. The proposed building would be constructed from concrete of muted, natural colors (e.g., gray and tan), with dark blue accents. The goal of the color palette is to assimilate the proposed building into the scenic landscape.

The project site is in the vicinity of, but not directly in, three locally designated scenic corridors that provide views of scenic vistas: U.S. 101, SR 217, and Hollister Avenue. As discussed under Section 4.1.1, existing views of the project site from U.S. 101 and Hollister Avenue are obscured by intervening buildings (mix of one, two, and three story residential, commercial, office, and industrial uses) and mature vegetation. Further, given the site's distance (0.9 mile and 0.7 mile respectively) from these roadways the proposed industrial building would not substantially degrade these scenic views.

Construction of the proposed industrial building may affect a locally designated scenic corridor along SR 217. The eastern edge of the site is located approximately 150 feet from the western edge of the 217 roadway and is separated by roadway vegetation and San Jose Creek floodway. The proposed building is to be placed 102 feet away from the eastern property. There would be approximately 250 feet between the building and the western edge of the 217 roadway.

The project site is visible from lanes traveling in both directions, although vegetation currently obscures most of the project site from the roadway. Figure 4.1-3 and Figure 4.1-4 depict existing and simulated views of the project site from the SR 217 local scenic corridor. As shown in Photograph 1 in Figure 4.1-3 and Figure 4.1-4, SR 217 currently offers a northward view of the Santa Ynez Mountains and foothills, which are designated scenic resources. When traveling north on SR 217, the existing movie screen and vegetation are visible and partially obscure views of the Santa Ynez Mountains. When traveling south on SR 217, project site vegetation and the existing movie screen are visible but do not hinder views of the Pacific Ocean. Figure 4.1-3 and Figure 4.1-4 demonstrate, through visual renderings (Photograph 2), that the proposed industrial building would rise above existing and proposed vegetation and the surrounding one- to two-story industrial development and would obstruct northward scenic views of the foothills and mountains. The proposed building would be located in the northeast of the project site and would have substantially more mass than the existing movie screen. The existing movie screen and laurel sumac shrubs behind the movie screen would be removed as part of the project; consequently, the proposed building would be more visible from SR 217 when compared to existing conditions until the proposed vegetation has matured. The project

would include landscaping that would screen the building, as the proposed cypress trees would be anticipated to reach 30 to 50 feet in height. However, the proposed cypress trees would take approximately 10 to 12 years to reach maturity (i.e. a height of 30 feet). While the project would be consistent with the height limitation of 35 feet from finished grade, the proposed industrial building would be constructed on 4 to 6 feet of fill material, giving the proposed building the appearance of being taller than surrounding development and emphasizing the proposed building against the scenic vista. The addition of the proposed industrial building would constitute a potentially significant impact to the northward scenic vista experienced from SR 217.

The project would also alter public views of the project site from Kellogg Avenue and South Fairview Avenue. As shown in Figure 4.1-5, Kellogg Avenue currently provides a direct view of the project site (Photograph 1) that would be largely obstructed by construction of the proposed industrial building (Photograph 2). Also shown in Figure 4.1-6, South Fairview Avenue provides views of project site vegetation (Photograph 1), and construction of the proposed industrial building would elevate the new structure above vegetation levels, so the building would be visible from South Fairview Avenue (Photograph 2). However, the Visual and Historic Resources Element of the Goleta General Plan does not recognize these roadways as scenic view corridors that provide scenic views, given the generic nature of surrounding development and lack of scenic resources on these two roadways. Therefore, changes to views from these local roadways would be a less than significant impact, as the project would add to existing development and there are no scenic views along these roadways of which the project could degrade.

Considering the project would substantially alter scenic views of the Santa Ynez Mountains and foothills from SR 217, a locally designated scenic corridor, the project would overall have a potentially significant impact to scenic vistas.

Mitigation Measures

There is no feasible mitigation that would reduce the impact level to less than significant. Landscaping is proposed to screen the proposed building; however, the proposed building would still obscure views of Santa Ynez Mountains. The proposed building height is the minimum height required to support the high-cube warehouse use. In addition, the proposed 4 to 6 feet of fill is necessary to elevate the proposed building above the 100-year floodplain which gives the proposed building the appearance of being taller than surrounding development. No additional mitigation is available beyond the proposed landscaping screening to reduce this visual impact.

Significance After Mitigation

Impacts would remain significant and unavoidable.

Threshold 2: Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact AES-2 THE PROJECT SITE IS LOCATED APPROXIMATELY 0.9 MILE FROM UNITED STATES ROUTE 101 (U.S. 101), WHICH IS ELIGIBLE FOR DESIGNATION AS A STATE SCENIC HIGHWAY THROUGHOUT GOLETA. THE PROJECT WOULD NOT IMPACT SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY. THERE WOULD BE NO IMPACT.

U.S. 101 is eligible for designation as a State Scenic Highway throughout Goleta, but is not officially designated as a State Scenic Highway in the vicinity of the project site. The project site is approximately 0.9 mile south of U.S. 101. Buildings and vegetation obscure views of the project site

and existing on-site development from vehicles travelling along U.S. 101. There are no scenic resources adjacent to U.S. 101 that would be affected by views of development on the project site. Given the distance of U.S. 101 from the project site, as well as the presence of intervening vegetation and structures, the addition of the proposed industrial building would not substantially degrade views from U.S. 101. Therefore, there would be no impact to scenic resources within an eligible State Scenic Highway.

Mitigation Measures

No mitigation measures are required.

Threshold 3: Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact AES-3 **THE PROJECT WOULD PERMANENTLY ALTER THE PROJECT SITE, REPLACING EXISTING BUILDINGS AND UNPAVED AREAS WITH AN INDUSTRIAL BUILDING AND ASSOCIATED SITE IMPROVEMENTS. THE PROJECT WOULD CONFLICT WITH GOLETA GENERAL PLAN POLICIES PERTAINING TO THE PRESERVATION OF VISUAL RESOURCES ALONG LOCALLY DESIGNATED SCENIC CORRIDORS, BUT WOULD NOT CONFLICT WITH APPLICABLE ZONING REGULATIONS. THIS IMPACT WOULD BE CLASS I, *SIGNIFICANT AND UNAVOIDABLE.***

The project would involve development of an approximately 70,594-square-foot industrial warehouse building with 60,939 square feet of landscaping, 102 parking spaces, and six loading zones (see Section 2, *Project Description*). The proposed building would be located on the northeastern-most portion of the project site. Approximately 4 to 6 feet of fill would be used to elevate the proposed building, and the building itself would have a height of 35 feet from finished grade, bringing the total height of the structure to approximately 39 to 41 feet from existing grade. Project landscaping would include native and climate-appropriate plantings within the proposed stormwater drainage basin, along the proposed parking lot, along the driveway connecting to South Kellogg Avenue, and along the exterior of the proposed industrial building.

The project site is located in the City's Coastal Zone. Section 30251 of the California Coastal Act requires that development projects in the Coastal Zone protect scenic and visual qualities, including views of the ocean and scenic coastal areas. The project would not obstruct or substantially degrade views of the Pacific Ocean, beach, or other coastal areas, as those scenic resources are currently not visible from the project site and southward views are blocked by intervening buildings, SR 217, and vegetation (Refer to Figure 4.1-2). Thus, the project would adhere to Section 30251 of the California Coastal Act.

The project site is zoned as M-S-GOL and M-1, and would be required to comply with development standards pursuant to Section 35-84A and Section 35-85 of the City's previous Coastal Zoning Ordinance.

Section 35-84A provides permitted uses and development standards for the M-S-GOL zone. The proposed industrial building, which would include operational activities such as warehouse storage, wholesaling, and distribution, is considered a permitted use for the M-S-GOL zone under Section 35-84A. According to Section 35-84A, no building or structure within the M-S-GOL zone may exceed a height of 35 feet from finished grade. The height of proposed industrial building would be approximately 39 to 41 feet when taking into account the amount fill proposed to elevated the

building out of the 100 year flood plain; however, the building would be 35 feet from finished grade. Therefore, the industrial building would not exceed 35 feet from finished grade, and would comply with the maximum height limitation for the M-S-GOL zone. Additionally, project design and operational activities would ensure compliance with the following performance standards from Section 35-84A:

- Open storage of equipment and materials shall be permitted only in areas screened from view of surrounding lots.

Section 35-85 provides permitted uses and development standards for the M-1 zone. Project operational activities are also included as permitted uses for the M-1 zone under Section 35-85, and the maximum height limit for the M-1 zone is 45 feet, which the proposed industrial building would not exceed. Performance standards for the M-1 zone in Section 35-85 are the same as those listed above for the M-S-GOL zone in Section 35-84A. Thus, project design and operational activities would ensure compliance with applicable performance standards.

Although the project would alter the site's existing visual character by introducing a new industrial building with associated site improvements, the proposed intensity and height of development would be generally consistent with the Goleta General Plan. For example, the project would be consistent with Policy VH 4.6, Industrial Areas, which requires industrial development to include architectural detailing to break building massing; adequate lighting; protected bicycle parking; screened outdoor storage, maintenance, or trash areas; and buffers or screens to protect residential development from industrial land uses. The project would comply with Policy VH 4.6 as it would use landscaping to screen the project site from SR 217 and residential development, would provide sufficient parking (including bicycle spaces), would screen outdoor maintenance or trash areas, would provide adequate lighting in accordance with City requirements, and would include architectural detailing to break massing of the proposed industrial building.

However, as discussed under Impact AES-1, the project may obstruct scenic views of the Santa Ynez Mountains and foothills experienced by northward travelers along SR 217. SR 217 is designated as a local scenic corridor; consequently, the project would be inconsistent with Goleta General Plan Policy VH 1.1, Scenic Resources, which identifies scenic resources in the City; Policy VH 2.2, Preservation of Scenic Corridors, which requires preservation of aesthetic qualities of scenic corridors; and Policy VH 2.3, Development Projects Along Scenic Corridors, which requires development adjacent to scenic corridors to not degrade or obstruct views of scenic areas. Please refer to Section 4.10, *Land Use and Planning*, for a detailed analysis of project consistency with Goleta General Plan goals and policies.

The project would introduce a new industrial warehouse building, along with parking and landscaping improvements, on the project site. While the project would be generally consistent with the Goleta General Plan and previous Coastal Zoning Ordinance, the project would directly conflict with General Plan policies VH 1.1, VH 2.2, and VH 2.3, which pertain to the preservation of scenic views along locally designated scenic corridors. Thus, the project would have a potentially significant impact regarding conflict with applicable regulations that govern scenic quality.

Mitigation Measures

There is no feasible mitigation that would reduce the impact level to less than significant.

Significance After Mitigation

Impacts would remain significant and unavoidable.

Threshold 4: Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-4 THE PROJECT WOULD INTRODUCE ON-SITE SOURCES OF LIGHT AND GLARE; HOWEVER, SUCH SOURCES WOULD BE CONSISTENT WITH CITY LIGHTING REGULATIONS AND FEDERAL AVIATION ADMINISTRATION STANDARDS. THEREFORE, IMPACTS INVOLVING LIGHT AND GLARE WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Project construction is not anticipated to occur during evening or nighttime hours and would thus not introduce new light sources to the project site during the construction time period. Consequently, the following discussion focuses on the project's operational impact involving light and glare.

The project would introduce new sources of light from the parking lot and the proposed industrial building exterior once operational. Lighting would consist of a combination of exterior building-mounted wall packs as well as pole-mounted fixtures in the parking lot. All lighting would use light emitting diode (LED) fixtures and would include semi- and fully cut-off light fixtures. Project lighting would be designed in accordance with City standards, including Goleta General Plan Policy 4.12, Lighting, which requires outdoor lighting fixtures to be designed, located, aimed downward or toward structures (if properly shielded), retrofitted if feasible, and maintained in order to prevent over-lighting, energy waste, glare, light trespass, and sky glow (City of Goleta 2006). Additionally, the project applicant has prepared a photometric plan that demonstrates project lighting would be contained on the project site and would not spill onto adjacent properties (Appendix Q).

As discussed further in Impact HAZ-5 in Section 4.8, *Hazards and Hazardous Materials*, project design, including lighting, would be subject to Federal Air Regulations (FAR) Part 77, which requires projects that may affect navigable airspace to submit a Notice of Proposed Construction or Alteration. If a proposed development is identified as a presumed hazard, the Federal Aviation Administration (FAA) may require further aeronautical study or allow the project to be revised. The project applicant would be required to file a Notice of Proposed Construction or Alteration with the FAA regional office at least 30 days prior to construction. Based on project design, the FAA would then determine whether the project poses a hazard to air navigation and could request changes to project design to minimize those hazards. The FAA would evaluate the project against FAR Part 77 Section 77.17, which provides height standards to ensure the project would not obstruct navigable airspace. Additionally, the FAA would provide lighting recommendations under FAR Part 77 Section 77.21 (d) [4]. Therefore, project lighting would not be substantial to the extent that it would interfere with aviation activity and interfere with views.

Moving sources of light would come from the headlights of vehicles driving on roadways near the project site and entering or exiting the project site early in the morning and evening. While project operation would involve vehicle travel, and thus potential light from vehicles, these lighting sources would be similar to existing conditions surrounding the project site, as commercial and industrial vehicles are frequent in the area.

The project would introduce new sources of glare in the form of focused, intense light from sunlight reflecting on the industrial building, parked car windows, or truck windshields when vehicles are backed up to loading docks. The proposed industrial building would be constructed from muted shades of concrete, including dark gray, light gray, tan, and dark blue, as well as aluminum and glass.

As the proposed industrial building would include light-colored exteriors with elements of metal and glass, the project has the potential to reflect sunlight and produce glare from this building. However, vegetative screening along the perimeter of the project site would reduce off-site impacts of glare from both the proposed building and from vehicles associated with building operation. Considering adjacent land uses include few glare-sensitive receptors, the potential for glare-related impacts would be limited. Overall, potential impacts associated with light and glare would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.1.4 Cumulative Impacts

Cumulative development includes foreseeable future projects from Table 3-1 in Section 3, *Environmental Setting*, that could have a direct connection to the visual environment of the proposed project. Future projects within one mile of the project site include circulation improvements on Ekwill Street and Fowler Street; replacement of the Hollister Avenue Bridge; San Jose Creek recreational trail improvements; natural gas infrastructure replacement; construction of two office/warehouse buildings; and expansion of the existing Honda and Toyota Dealerships.

Cumulative development on vacant and underutilized land in the Goleta area could obstruct scenic views or vistas experienced from U.S. 101, SR 217, or other public viewing areas. However, implementation of policies to protect scenic vistas from the City's Visual and Historic Resources Element would reduce the magnitude of cumulative impacts to scenic vistas and views. As discussed under Impact AES-1, the project would have a significant and unavoidable impact to scenic vistas given that construction and operation of the proposed industrial building would obstruct views of the Santa Ynez Mountains and foothills experienced by northbound travelers on SR 217. While project design includes muted construction materials and landscaping to integrate the proposed building into the surrounding landscape, this impact cannot be mitigated to a less than significant level. Cumulative projects along the SR 217 corridor include replacement of the San Jose Creek bridge, San Jose Creek recreational trail improvements, the San Jose Creek Fish Passage Project, and expansion of the existing Honda and Toyota Dealerships. Replacement of the San Jose Creek bridge would not involve construction of a new structure that would be visible from SR 217, as the bridge is currently part of the existing visual landscape. The other cumulative projects associated with San Jose Creek within the vicinity of the SR 217 corridor would largely consist of ground-level improvements. The expansion of the existing Honda and Toyota Dealerships would involve new construction of a 27-foot tall structure on the Honda Dealership and an approximately 20-foot tall service bay on the Toyota Dealership. However, both of these additions would be located at the rear of the respective properties, and not visible from SR 217. Therefore, cumulative development would not result in the addition of tall structures that could permanently obstruct scenic views from SR 217. Cumulative impacts to scenic vistas would be less than significant.

There are no officially designated State Scenic Highways in Goleta, thus, there would be no cumulative impacts to visual resources visible from a State Scenic Highway. As discussed under Impact AES-2, the project site is not visible from a designated State Scenic Highway as one does not exist in Goleta. Therefore, the project would not have a cumulatively considerable impact to visual resources near scenic highways.

Cumulative development on vacant and underutilized land in the Goleta area could result in the overall degradation of visual character. Future projects in the Goleta area would adhere to applicable zoning and development regulations, as well as General Plan policies, which would reduce potential

impacts to visual resources and visual character. As discussed under Impact AES-3, the project may conflict with Goleta General Plan policies related to the preservation of views from locally designated scenic corridors, and this impact would be significant and unavoidable. However, cumulative projects would not result in the addition of tall structures that could permanently obstruct scenic views in the area. Therefore, cumulative impacts to visual character would be less than significant.

Cumulative development would contribute to an increase in light and glare throughout Goleta. However, future projects, including the proposed project, would be required to implement City lighting regulations, which would minimize the potential for skyglow or light trespass by requiring lighting fixtures to be designed, located, aimed downward or toward structures (if properly shielded), and retrofitted if feasible. Therefore, although several projects listed in Table 3-1 would occur in the near vicinity of the project site, implementation of City lighting regulations would ensure that substantial cumulative light and glare impacts would not be expected. As discussed under Impact AES-4, the project would have a less than significant impact involving light and glare. The project would add new sources of light and glare from the proposed industrial building and associated vehicles; however, given implementation of City lighting requirements and the existing FAR Part 77 regulatory requirement, this impact would be less than significant. Therefore, the project would not have a cumulatively considerable impact to light and glare, and overall cumulative impacts would be less than significant.

4.2 Air Quality

The section analyzes the potential air quality impacts of project construction and operation, including impacts to nearby sensitive receptors. Construction and operational emissions associated with project buildout were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1. Results were compared to Santa Barbara County Air Pollution Control District (SBCAPCD) thresholds.

4.2.1 Environmental Setting

Climate and Topography

The project site is located in the South Central Coast Air Basin (SCCAB), which includes all of San Luis Obispo, Santa Barbara, and Ventura Counties. The 2022 Ozone Plan for Santa Barbara County describes the air quality setting for the county in detail, including the local climate and meteorology, current and projected air quality, and the regulatory framework for the management of air quality. The climate of the SCCAB is strongly influenced by its proximity to the Pacific Ocean and the location of the semi-permanent high-pressure cell in the northeastern Pacific. The Mediterranean climate of the Goleta region produces moderate average temperatures although extreme temperatures can be reached in the winter and summer. The warmest months of the year are August and September, and the coldest month of the year is January. The annual average maximum temperature is 69.3 degrees Fahrenheit (°F), while the annual average minimum temperature is 48.6°F. Rainfall is concentrated in the winter months. Local climate conditions are summarized below in Table 4.2-1.

Table 4.2-1 Goleta Climate Conditions

Temperature Condition	Amount
Average annual rainfall	16.3 inches
Annual average maximum temperature	69.3°F
Annual average minimum temperature	48.6°F
Warmest month	August/September
Coolest month	January
Annual mean temperature	59°F

°F = degrees Fahrenheit
Note: Averages are based on the period of record from January 2, 1941, to June 9, 2016 at the Santa Barbara Municipal Airport, approximately 0.25 miles west of the project site.
Source: Western Regional Climate Center 2016

Temperature inversions (warmer air on top of cooler air) is a common meteorological condition in the area. Inversions in Goleta are formed by the more rapid cooling of air near the ground at night, especially during the winter. This type of inversion is typically seen at lower elevations and is generally accompanied by stable air. Inversions limit the dispersal of air pollutants within the regional airshed because more stable air conditions (i.e., low wind speeds and uniform temperatures) result in lower rates of pollutant dispersion.

Air Pollutants of Primary Concern

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere. Primary criteria pollutants include carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter with 10 microns in diameter or less (PM_{10}), particulate matter with 2.5 microns or less ($PM_{2.5}$), sulfur dioxide (SO_2), and lead (Pb). Ozone (O_3) is considered a secondary criteria pollutant because it is created by atmospheric chemical and photochemical reactions between reactive organic compounds (ROC) and nitrogen oxides (NO_X). These pollutants can have adverse impacts on human health at certain levels of exposure. The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants.

Ozone

Ozone (O_3) is a highly oxidative unstable gas produced by a photochemical reaction (triggered by sunlight) between NO_X and ROC/volatile organic compounds (VOC).[1] ROC is composed of non-methane hydrocarbons (with specific exclusions), and NO_X is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and NO_2. NO_X is formed during the combustion of fuels, while ROC is formed during the combustion and evaporation of organic solvents. As a highly reactive molecule, O_3 readily combines with many different atmosphere components. Consequently, high O_3 levels tend to exist only while high ROC and NO_X levels are present to sustain the O_3 formation process. Once the precursors have been depleted, O_3 levels rapidly decline. Because these reactions occur on a regional rather than local scale, O_3 is considered a regional pollutant. In addition, because O_3 requires sunlight to form, it mainly occurs in concentrations considered serious between April and October. Groups most sensitive to O_3 include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors (United States Environmental Protection Agency [United States EPA] 2022a). Depending on the level of exposure, O_3 can cause coughing and a sore or scratch throat; make it more difficult to breathe deeply and vigorously and cause pain when taking a deep breath; inflame and damage the airways; make the lungs more susceptible to infection; and aggravate lung diseases such as asthma, emphysema, and chronic bronchitis.

Carbon Monoxide

Carbon monoxide (CO) is a localized pollutant found in high concentrations near its source. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic's incomplete combustion of petroleum fuels. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Other sources of CO include the incomplete combustion of petroleum fuels at power plants and fuel combustion from wood stoves and fireplaces throughout the year. When CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease. These people already have a reduced ability to get oxygenated blood to their hearts in situations where they need more oxygen than usual. As a result, they are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina (United States EPA 2022a).

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

Nitrogen Dioxide

Nitrogen dioxide (NO_2) is a by-product of fuel combustion. The primary sources are motor vehicles and industrial boilers, and furnaces. The principal form of NO_X produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2, commonly called NO_X. NO_2 is a reactive, oxidizing gas and an acute irritant capable of damaging cell linings in the respiratory tract. Breathing air with a high concentration of NO_2 can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases leading to respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma, such as children and the elderly are generally at greater risk for the health effects of NO_2 (United States EPA 2022a). NO_2 absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of O_3/smog and acid rain.

Sulfur Dioxide

Sulfur dioxide (SO_2) is included in a group of highly reactive gases known as "oxides of sulfur." The largest sources of SO_2 emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of SO_2 emissions include industrial processes such as extracting metal from ore and burning fuels with a high sulfur content by locomotives, large ships, and off-road equipment. Short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult. People with asthma, particularly children, are sensitive to these effects of SO_2 (United States EPA 2022a).

Particulate Matter

Suspended atmospheric PM_{10} and $PM_{2.5}$ are comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. Both PM_{10} and $PM_{2.5}$ are emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. The atmosphere, through chemical reactions, can form particulate matter. The characteristics, sources, and potential health effects of PM_{10} and $PM_{2.5}$ can be very different. PM_{10} is generally associated with dust mobilized by wind and vehicles. In contrast, $PM_{2.5}$ is generally associated with combustion processes and formation in the atmosphere as a secondary pollutant through chemical reactions. PM_{10} can cause increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling. For $PM_{2.5}$, short-term exposures (up to 24-hours duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases (CARB 2023a).

Lead

Lead (Pb) is a metal found naturally in the environment, as well as in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial. However, due to the United States EPA 's regulatory efforts to remove lead from gasoline, atmospheric Pb concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred before 1990 due to the removal of Pb from gasoline sold for most highway vehicles. Pb emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least partly due to national emissions standards for hazardous

air pollutants (United States EPA 2014). As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest Pb level in the air is generally found near Pb smelters. Other stationary sources include waste incinerators, utilities, and Pb-acid battery manufacturers. Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and cardiovascular system depending on exposure. Pb exposure also affects the oxygen-carrying capacity of the blood. The Pb effects most likely encountered in current populations are neurological in children. Infants and young children are susceptible to Pb exposures, contributing to behavioral problems, learning deficits, and lowered IQ (United States EPA 2022a).

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, Toxic Air Contaminants (TAC) are airborne substances diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about $1/70^{th}$ the diameter of a human hair) and thus is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2022a). TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (United States EPA 2020).

Current Air Quality

CARB maintains over 60 air quality monitoring stations throughout California, including two stations in Santa Barbara County. Other monitoring stations in Santa Barbara County are maintained by Santa Barbara County Air Pollution Control District (SBCAPCD). The nearest monitoring station to the project site is the Goleta-Fairview station, located at 380 N. Fairview Avenue, approximately 1.25 miles northwest of the project site. The pollutants monitored at this station are O_3, PM_{10}, and $PM_{2.5}$. The data collected at this station is generally representative of the baseline air quality experienced in the project area. SO_2 has not been monitored at this station since 2009. The last recorded 24-hour average SO_2 value was 0.001 parts per million (ppm), which is below the state 24-hour standard of 0.14 ppm and the federal 24-hour standard of 0.04 ppm. NO_2 and CO have not been monitored at this station since 2019 and 2012, respectively. The last recorded worst-hour NO_2 value was 0.027 ppm, which is below the state and federal standard. In addition, the last recorded 8-hour average CO value was 0.65 ppm, which is below the state and federal 8-hour CO standard of 9.0 ppm. The nearest monitoring station in Santa Barbara County that collects NO_2 data is approximately eight miles north of the project site at the Paradise Road station. In addition, the nearest monitoring site that collects CO data is approximately 20 miles west of the project site at the Las Flores Canyon #1 station. Table 4.2-2 summarizes the annual air quality data for the local airshed from the Goleta-Fairview station.

As shown in Table 4.2-2, PM_{10} measurements exceeded the state standards in the years 2020 and 2022. In addition, $PM_{2.5}$ measurements exceeded the federal $PM_{2.5}$ standard exceedances in 2020. No other state or federal standards were exceeded at these monitoring stations.

Table 4.2-2 Ambient Air Quality Data

Pollutant	2020	2021	2022
Ozone (ppm), Worst Hour[1]	0.084	0.063	0.070
Number of days of state exceedances (>0.09 ppm)	0	0	0
Number of days of federal exceedances (>0.12 ppm)	0	0	0
Ozone (ppm), 8-Hour Average[1]	0.067	0.055	0.059
Number of days of state and federal exceedances (>0.07 ppm)	0	0	0
NO_2 (ppm), Worst Hour[2]	0.007	0.003	0.0088
Number of days of state exceedances (>0.18 ppm)	0	0	0
Number of days of federal exceedances (>0.10 ppm)	0	0	0
Carbon Monoxide (ppm), Highest 8-Hour Average3	1.0	4.5	0.6
Number of days above CAAQS or NAAQS (>9.0 ppm)	0	0	0
PM_{10} ($\mu g/m^3$), Worst 24 Hours[1]	85.8	49.4	50.6
Number of days of state exceedances (>50 $\mu g/m^3$)	11	0	1
Number of days of federal exceedances (>150 $\mu g/m^3$)	0	0	0
$PM_{2.5}$ ($\mu g/m^3$), Worst 24 Hours[1]	61.2	19.4	15.4
Number of days of federal exceedances (>35 $\mu g/m^3$)	6	0	0

ppm= parts per million, $\mu g/m^3$ = microgram per cubic meter, NO_2= nitrogen dioxide, PM_{10}= particulate matter with 10 microns in diameter or less, $PM_{2.5}$ = particulate matter with 2.5 microns in diameter or less.

[1]Data collected at the Goleta-Fairview station.

[2]Data collected at the Paradise Road station.

[3]Data collected at the Las Flores Canyon #1 station.

Source: CARB 2023b

Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005; OEHHA 2015). Some land uses considered more sensitive to air pollution than others due to the types of population groups present or activities involved are referred to as sensitive receptors. Examples of these sensitive receptors are residences, schools/daycare centers, and hospitals. Sensitive receivers nearest to the project site consist of mobile homes in the Rancho Goleta mobile home community, located approximately 325 feet east of the project site. Additional sensitive receptors are found approximately 340 feet west of the project site at single-family residences.

4.2.2 Regulatory Setting

The federal and state governments have authority under the federal and state Clean Air Acts (CAA) to regulate emissions of airborne pollutants and have established ambient air quality standards (AAQS) for the protection of public health. An air quality standard is defined as "the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without harming public health" (CARB 2023c). The United States EPA is the federal agency designated to administer air quality regulation, while CARB is the state equivalent in California. Federal and state AAQS have been established for six criteria pollutants: O_3, CO, NO_2, SO_2, $PM_{10,}$ $PM_{2.5}$, and Pb. AAQS are designed to protect those segments of the public most susceptible to respiratory distress, such as children under the age of 14, the elderly (over the age of 65), persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases (United States EPA 2022b). In addition, the state of California has established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards (CARB 2023d). The federal and state CAA are described in more detail below.

a. Federal Regulations

The CAA was enacted in 1970 and amended in 1977 and 1990 [42 United States Code (USC) 7401] for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, to achieve the purposes of Section 109 of the CAA [42 USC 7409], the United States EPA developed primary and secondary National Ambient Air Quality Standards (NAAQS).

The primary NAAQS "In the judgment of the Administrator[2], based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health," and the secondary standards are to "protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" [42 USC 7409(b)(2)]. The United States EPA classifies specific geographic areas as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with the NAAQS. States are required to adopt enforceable plans, known as a State Implementation Plan (SIP), to achieve and maintain air quality meeting the NAAQS. State plans also must control emissions that drift across state lines and harm air quality in downwind states. Table 4.2-3 lists the current federal standards for regulated pollutants.

[2] The term "Administrator" means the Administrator of the United States EPA .

Table 4.2-3 Federal and State Ambient Air Quality Standards

Pollutant	NAAQS	CAAQS
Ozone	0.070 ppm (8-hr avg)	0.09 ppm (1-hr avg) 0.070 ppm (8-hr avg)
Carbon Monoxide	35.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)	20.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.100 ppm (1-hr avg) 0.053 ppm (annual avg)	0.18 ppm (1-hr avg) 0.030 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg) 0.5 ppm (3-hr avg) 0.14 ppm (24-hr avg) 0.030 ppm (annual avg)	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)
Lead	0.15 μg/m^3 (rolling 3-month avg) 1.5 μg/m^3 (calendar quarter)	1.5 μg/m^3 (30-day avg)
Particulate Matter (PM_{10})	150 μg/m^3 (24-hr avg)	50 μg/m^3 (24-hr avg) 20 μg/m^3 (annual avg)
Particulate Matter ($PM_{2.5}$)	35 μg/m^3 (24-hr avg) 9 μg/m^3 (annual avg)	12 μg/m^3 (annual avg)
Visibility-Reducing Particles	No Federal Standards	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07–- 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape. (8-hr avg)
Sulfates	No Federal Standards	25 μg/m^3 (24-hr avg)
Hydrogen Sulfide	No Federal Standards	0.03 ppm (1-hr avg)
Vinyl Chloride	No Federal Standards	0.01 ppm (24-hr avg)

NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards; ppm = parts per million; avg = average; μg/m^3 = micrograms per cubic meter

Source: CARB 2016, United States EPA 2024

To derive the NAAQS, the United States EPA reviews data from integrated science assessments and risk/exposure assessments to determine the ambient pollutant concentrations at which human health impacts occur, then reduces these concentrations to establish a margin of safety (United States EPA 2022c). As a result, human health impacts caused by the air pollutants discussed above may affect people when ambient air pollutant concentrations are at or above the concentrations established by the NAAQS. The closer a region is to attainting a particular NAAQS, the lower the human health impact is from that pollutant (San Joaquin Valley Air Pollution Control District 2015). Accordingly, ambient air pollutant concentrations below the NAAQS are considered to be protective of human health (CARB 2023c and 2023d). The NAAQS and the underlying science that forms the basis of the NAAQS are reviewed every five years to determine whether updates are necessary to continue protecting public health with an adequate margin of safety (United States EPA 2015).

b. State Regulations

California Clean Air Act

The California Clean Air Act (CCAA) was enacted in 1988 (California Health & Safety Code (H&SC) §39000 et seq.). Under the CCAA, the state has developed the California Ambient Air Quality Standards (CAAQS), which are generally more stringent than the NAAQS. Table 4.2-3 lists the current state standards for regulated pollutants. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to the federal CAA, the CCAA classifies specific geographic areas as either "attainment" or "nonattainment" areas for each pollutant, based on the comparison of measured data within the CAAQS.

Toxic Air Contaminants

A TAC is an air pollutant that may cause or contribute to an increase in mortality or serious illness or which may pose a present or potential hazard to human health. TACs may result in long-term health effects such as cancer, birth defects, neurological damage, asthma, or genetic damage, or short-term acute effects such as eye watering, respiratory irritation, runny nose, throat pain, and headaches. TACs are considered either carcinogenic or non-carcinogenic based on the nature of the health effects associated with exposure. For carcinogenic TACs, potential health impacts are evaluated in terms of overall relative risk expressed as excess cancer cases per one million exposed individuals. Non-carcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

TACs include both organic and inorganic chemical substances. One of the main sources of TACs in California is diesel engines that emit exhaust containing solid material known as DPM; however, TACs may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities.

In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: Health and Safety Code Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics "Hot Spot" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spot" Act are to collect emission data, identify facilities having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, California Senate Bill (SB) 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air quality monitoring network, and develop any additional air toxic control measures needed to protect children's health.

State Implementation Plan

The SIP is a collection of documents that set forth the state's strategies for achieving the AAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, and permitting), district rules, state regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under state law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the United States EPA for approval and publication in the Federal Register. The items included in the California SIP are listed in the Code of Federal Regulations at 40 Code of Federal Regulations 52.220.

The 2022 Santa Barbara County Air Quality Management Plan (AQMP) is the SIP for Santa Barbara County. The AQMP accommodates growth by projecting the growth in emissions based on different indicators. For example, population forecasts adopted by SCCAB are used to forecast population-related emissions. Through the planning process, emissions growth is offset by basin-wide controls on stationary, area, and transportation sources of air pollution.

California Code of Regulations

The California Code of Regulations is the official compilation and publication of the regulations adopted, amended or repealed by state agencies pursuant to the Administrative Procedure Act. They are compiled into Titles and organized into Divisions containing the regulations of state agencies. The following California Code of Regulations would be applicable to the proposed Project:

- **Engine Idling.** In accordance with Section 2485 of Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- **Emission Standards.** In accordance with Section 93115 of Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

NAAQS and CAAQS Attainment Status

California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality. If an air basin is not in either federal or state attainment for a particular pollutant, the basin is classified as a nonattainment area for that pollutant. Under the federal and state CAA, once a nonattainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant. To be redesignated, the area must meet air quality standards and have a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. Areas that have been redesignated to attainment are called maintenance areas.

The project site is within Santa Barbara County, which currently meets the NAAQS for all criteria air pollutants. Santa Barbara County is classified an attainment/maintenance area under the CAAQS for CO, and attainment for $PM_{2.5}$. Santa Barbara County is currently classified as a nonattainment area under the CAAQS for O_3 and PM_{10} (Santa Barbara County 2023).

c. Local Regulations

Santa Barbara County Air Pollution Control District

As the local air quality management agency, the Santa Barbara County Air Pollution Control District (SBCAPCD) is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the SCCAB is classified as being in "attainment" or "nonattainment." In areas designated as non-attainment for one or more air pollutants, a cumulative air quality impact exists for those air pollutants, and the human health impacts described in Section 4.2.1*, Environmental Setting*, are already occurring in that area as part of the environmental baseline condition.

Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The *2001 Clean Air Plan* (2002) was the first plan prepared by SBCAPCD and established specific planning requirements to maintain the state one-hour O_3 standard. In 2006, CARB revised the CAAQS and added an 8-hour average to the O_3 standard. Both components of the standard must now be met before CARB can designate an area to be in attainment. The most recent *2022 Ozone Plan* was adopted by SBCAPCD in December 2022 and was the seventh update to the *2001 Clean Air Plan*. The *2022 Ozone Plan* addresses the state O_3 standards only because the District is designated "attainment" for the federal 8-hour O_3 standards, including the most recent standard of 0.070 ppm promulgated by the United States EPA in 2015.

To minimize potential impacts from project emissions, the SBCAPCD implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects. Rules and regulations relevant to the project include the following:

- **Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities).** This rule establishes fugitive dust control requirements for any activity associated with construction or demolition of a structure or structures.
- **Rule 323.1 (Architectural Coatings).** This rule establishes volatile organic content limits for architectural coatings that are manufactured, blended, repackaged, supplied, sold, or offered for sale within the SBCAPCD. Rule 323.1 limits the volatile organic content to 50 grams per liter for flat coatings and 100 grams per liter for nonflat coatings and traffic marking coatings.
- **Rule 329 (Cutback and Emulsified Asphalt Paving Materials).** This rule establishes ROC content limits pertaining to the manufacture, application, and sale of cutback and emulsified asphalt materials for paving, construction, and maintenance of streets, highways, parking lots, and driveways.

City of Goleta General Plan

The City of Goleta General Plan Conservation Element is intended to guide land use planning by providing goals and policies to preserve air quality. Goals and policies that are applicable to the proposed project include:

- **Policy CE 12 Protection of Air Quality:** To maintain and promote a safe and healthy environment by protecting air quality and minimizing pollutant emissions from new development and from transportation sources.

- **CE 12.2 Control of Air Emissions from New Development:** The following shall apply to reduction of air emissions from new development:
  a. Any development proposal that has the potential to increase emissions of air pollutants shall be referred to the Santa Barbara County Air Pollution Control District for comments and recommended conditions prior to final action by the City.
  b. All new commercial and industrial sources shall be required to use the best available air pollution control technology. Emissions control equipment shall be properly maintained to ensure efficient and effective operation.
  c. Adequate buffers between new sources and sensitive receptors shall be required.
  d. Any permit required by the Santa Barbara County Air Pollution Control District shall be obtained prior to issuance of final development clearance by the City.
- **CE 12.3 Control of Emissions during Grading and Construction:** Construction site emissions shall be controlled by using the following measures:
  a. Watering active construction areas to reduce windborne emissions.
  b. Covering trucks hauling soil, sand, and other loose materials.
  c. Paving or applying nontoxic solid stabilizers on unpaved access roads and temporary parking areas.
  d. Hydroseeding inactive construction areas.
  e. Enclosing or covering open material stockpiles.
  f. Revegetating graded areas immediately upon completion of work.

4.2.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Air pollutant emissions generated by project construction and operation were estimated using CalEEMod version 2022.1. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod allows for the use of standardized data (e.g., emission factors, trip lengths, meteorology, source inventory) provided by the various California air districts to account for local requirements and conditions, and/or user-defined inputs. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide Appendices C, D, and G (California Air Pollution Control Officers Associated 2022). The analysis reflects the details of construction and operation of the proposed project as described in Section 2.0, *Project Description*.

Construction

Project construction would primarily generate temporary criteria pollutant emissions from construction equipment operation on-site, construction worker vehicle trips to and from the site, and import of materials off-site. Construction of the proposed project was analyzed based on the land use type and square footage described provided by the applicant, which includes an industrial warehouse, parking spaces, landscaping, and pipelines. Construction of the proposed project would begin in July

2027 and end in September 2028. The model included 3,663 square-feet of demolition for the existing structures and construction debris would be hauled to the Tajiguas landfill, approximately 18.8 miles from the project site. In addition, approximately 37,400 cubic yards of soil would be imported to elevate the building. Construction debris and soil hauled is assumed to be transported by approximately 1,100 dump truck with 34 cubic yard hauling capacity. Based on aerial Google Earth measurements, the water, sewer, and gas pipelines would be approximately 4,373 linear feet to connect the project site to the existing lines adjacent to South Kellogg Avenue. It is assumed that pipeline construction would overlap the construction of the warehouse for approximately 55 days.[3] It is assumed that construction equipment used would be diesel-powered and the project would comply with applicable regulatory standards, such as SBCAPCD fugitive dust control measures and Rule 323.1 Architectural Coating.

Operation

Operational emissions modeled include mobile source emissions, energy emissions, and area source emissions. Mobile source emissions are generated by vehicle trips to and from the project site. Daily vehicle trips were sourced from the Updated Traffic and Circulation Study prepared by Associated Transportation Engineers for the proposed project (Appendix B). The trip generation rates in CalEEMod were adjusted to be consistent with the 252 daily vehicle trips estimate in the Traffic and Circulation Study. Based on the Traffic and Circulation Study, approximately 11 percent of the daily vehicle trips would consist of heavy-heavy duty trucks, as shown in Appendix B. Therefore, the project would generate approximately 28 daily one-way truck trips. The vehicle fleet mix was adjusted for 224 passenger vehicles (LDA) and 28 heavy-heavy-duty trucks (HHD). Emissions attributed to energy use include natural gas consumption by appliances and space and water heating. The project site would be supplied with 100 percent renewable electricity from the Central Coast Community Energy prime option. In addition, area source emissions are generated by landscape maintenance equipment, consumer products, and architectural coatings.

Health Risk Assessment

The greatest potential for TAC emissions during construction and operations of the project would be DPM emissions associated with heavy-duty equipment during grading and building construction activities and operational truck trips. In addition, incidental amounts of toxic substances such as oils, solvents, and paints would be used. These products would comply with all applicable SBCAPCD rules for their manufacture and use. The proposed project would be subject to several SBCAPCD rules designed to limit exposure to TACs during construction and operational activities.

The construction and operational HRA was performed in accordance with the revised OEHHA *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA 2015). The OEHHA Guidance considers the sensitivity of children to TAC emissions, different breathing rates, and time spent at home. Children have a higher breathing rate compared to adults and would likely spend more time at home in nearby residences resulting in longer exposure durations.

The process of assessing health risks from cancer and chronic risk includes a degree of uncertainty. The level of uncertainty depends on the availability of data and the extent to which assumptions are relied upon in cases where the data is incomplete or unknown. All health risk assessments rely upon scientific studies to reduce the level of uncertainty; however, it is not possible to eliminate uncertainty from the analysis. Where assumptions are used to substitute for incomplete or unknown data, it is

[3] Assume a pipeline installation rate of 80 linear feet per day. (4.373 linear feet divide by 80 linear feet per day) = 54.66 days

standard practice in performing health risk assessments to err on the side of health protection to avoid underestimating or underreporting the risk to the public. In general, sources of uncertainty that may lead to an overestimation or an underestimation of the risk include extrapolation of the toxicity data associated with animal exposure used to estimate exposure effects in humans and uncertainty in the exposure estimates. In addition to uncertainty, there exists "a natural range or variability in measured parameters defining the exposure scenario" and the fact that "the greatest quantitative impact is variation among the human population in such properties as height, weight, food consumption, breathing rates, and susceptibility to chemical toxicants" (OEHHA 2015). It is typical to err on the side of health protection by assessing risk on the most sensitive populations, such as children and the elderly, by modeling potential cancer and chronic risk based on high-end breathing rates, by incorporating age sensitivity factors (ASFs), and by not considering exposure reduction measures, such as mechanical air filtration building systems.

Construction emissions rates were based on anticipated annual emissions modeled using the California Emissions Estimator Model (CalEEMod) version 2022.1. CalEEMod differentiates between particulate matter emitted from engine exhaust (i.e., DPM) and particulate matter emitted from ground disturbing activities (i.e., fugitive dust, which does not constitute DPM) (California Air Pollution Control Officers Association [CAPCOA] 2022). DPM concentration was estimated based on the PM_{10} exhaust emissions (not including fugitive PM_{10}) provided by CalEEMod, which are DPM emissions resulting from combustion of diesel-fueled vehicles and off-road equipment during construction. PM_{10} exhaust is composed of DPM and other air toxics; therefore, PM_{10} exhaust is a conservative estimate for DPM emissions estimates.

Operational emissions rates were based on EMission FACtor (EMFAC) PM_{10} exhaust emissions rates for Santa Barbara County during the project's 2028 operational year. The emissions rates for diesel heavy-heavy duty trucks were obtained for speeds of 20, 30, 35, and 40 miles per hour to represent traffic speeds on the project site and the truck route to State Route 217. In addition, emissions rates for an aggregate of speeds were obtained for diesel heavy-heavy duty trucks to represent the idling emissions that would occur at the loading docks.

Dispersion Modeling

Dispersion modeling was performed using the U.S. EPA-approved *American Meteorological Society/Environmental Protection Agency Regulatory Model* (AERMOD) with meteorological data from the representative SBCAPCD monitoring station located in Goleta. The Santa Barbara Airport is the nearest representative air monitoring station with meteorological data and is approximately a quarter mile west of the project site. Vehicle exhaust emissions sources for the project were located on the project site corresponding to the areas of construction and operational activity. Construction activity, including the utility pipeline installation throughout the project site, was modeled as an area source in AERMOD with an assumed release height of five meters, corresponding to the approximate height of off-road equipment mufflers from which exhaust emissions would be released (SCAQMD 2008). Since a portion of construction activity would occur on top of four to six feet of fill, this analysis conservatively estimates cancer and chronic risk with a release height of 5 meters, which would have lower offsite dispersion and greater DPM concentrations at nearby sensitive receptors. Line volume sources[4] were used to represent the haul route, operational truck routes, and idling locations. Construction emissions would not be generated during nighttime hours; therefore, the dispersion modeling allocates the emissions during active construction hours, Monday to Friday from 8:00 a.m.

[4] A series of volume sources with a plume height and width along a line segment based on vehicle height and roadway width.

to 5:00 p.m. Operational emissions were modeled during the project's operating hours of Monday to Saturday from 7:00 a.m. to 6:00 p.m.

347 receptors points using 10-meter spacing were used in AERMOD to represent existing sensitive receptors surrounding the project site. Sensitive receptors identified for modeling were placed at the location of nearby sensitive land uses, which includes residences within 1,000 feet from the project site and along the truck route on South Kellogg Avenue. This analysis focuses on health risk impacts to residential uses because residential exposure parameters, including age sensitivity factors and childhood breathing rates, represent the worst-case exposure scenario. Those sites not specifically modeled would result in risk that would be less than the risk modeled for those receptors included in the analysis due to a lesser exposure duration than residential receptors immediately adjacent to other commercial and industrial land uses. The analysis accounts for the residential receptors located west of the project site, and the Rancho Goleta mobile home park approximately 325 feet east of the project site. In addition, sensitive receptors 1,550 feet from the project site at 175- unit Winslowe townhomes complex were modeled to account for cancer and chronic risk from emissions from truck trips.

Cancer Risk

Health risk impacts were assessed using health risk calculation methodology consistent with the 2015 OEHHA Guidance. This health risk assessment addresses construction and operational DPM emissions and the effects on nearby sensitive uses (residential).

Health impacts were evaluated using a dose-response assessment, which describes the relationship between the level of exposure to a substance (i.e., the dose) and the incidence or occurrence of injury (i.e., the response). To determine the total dose to off-site sensitive receptors, the applicable pathways of exposure were identified. The applicable exposure pathways (e.g., inhalation) were identified for the emitted substances, and the receptor locations were identified. The applicable exposure pathways determine the exposure algorithms that are used to estimate dose. After the exposure pathways were identified, the applicable fate and transport algorithms were used to estimate concentrations in the applicable exposure media (e.g., air) and the exposure algorithms were used to determine the substance-specific dose. In accordance with the OEHHA Guidance, the inhalation pathway was evaluated for construction-related and operational-related DPM. For the inhalation pathway, the dose is directly proportional to the breathing rate. As a conservative (i.e., health protective) approach, maximum breathing rates were used in this analysis.

Once dose was calculated, cancer risk was calculated by accounting for cancer potency of the specific pollutant, age sensitivity, exposure duration, averaging time for lifetime cancer risk, and fraction of time spent at home (sensitive receptor). The cancer potency factor (CPF) is specific for each pollutant and is determined through peer-reviewed scientific studies. For example, the Scientific Review Panel recommends a CPF for DPM of 3.0×10^{-4} $(\mu g/m^3)^{-1}$ and a slope factor of 1.1 $(ppm\text{-}day)^{-1}$.[5] The ASFs account for greater susceptibility in early life as compared to adult exposure, starting from the third trimester of pregnancy to 16 years. The fraction of time at home (FAH) takes into account the time actually residing at the sensitive receptor location for various age groups. For example, newborns are expected to reside at home for longer periods of time compared to school-age children, and the elderly (retirees) are expected to spend more time at home compared to people of working age. FAH consistent with OEHHA guidelines were used for the analysis.

[5] CPF and slope factors are built into the HARP2 model used for quantifying risk.

Each age group has different exposure parameters which require cancer risk to be calculated separately for each age group. The estimation of cancer risk uses the following algorithms:

Risk = Dose inhalation × Inhalation CPF × ASF (Equation 1)

Where:

Dose inhalation = CAIR × DBR × A × EF × ED × FAH/AT (Equation 2)
Inhalation CPF = inhalation cancer potency factor
ASF = age-sensitivity factor

Where:

CAIR = concentration of compound in air in micrograms per cubic meter (µg/m3)
DBR = breathing rate in liter per kilogram of body weight per day (L/kg-body weighty/day)
A = inhalation absorption factor (1 for DPM)
EF = exposure frequency in days per year (day/year)
ED = exposure duration in years (year)
FAH = fraction of time at home
AT = averaging time period over which exposure is averaged in days (day)

The OEHHA recommended values for the equations and daily breathing rates (DBR) described above were used in the HRA. Specific modeling details are included in Appendix P.

The incremental increase in cancer risk is the result of multiplying the dose by the pollutant-specific CPF values. Cancer risk is calculated by multiplying the inhalation dose by the inhalation CPF to yield the potential inhalation excess cancer risk. Cancer risk was evaluated for residences in the surrounding area. Risk for all receptors as well as modeling output is included as part of Appendix P of this EIR.

In addition to analyzing health risk during construction and operation, the analysis also considered combined health risk. Construction activity would occur over 15 months; therefore, the combined health risk analysis assumed construction would begin at 3rd trimester age group and would be completed during the first 12 months of the 0-2 years age group, based on OEHHA guidance. In order to provide a more conservative analysis, the operational HRA also began the health risk evaluation at the 3rd trimester age group, because of the greater sensitivity to carcinogens during early-in-life exposure. Because this approach essentially assumes concurrent (instead of consecutive) construction and operation for the 3rd trimester and 0-2 age groups, the combined health risk assessment increases the health risk for these age groups which results in a conservative analysis compared to assuming consecutive construction and operation.

Non Cancer Risk

Non-cancer chronic impacts affect specific target organ systems (also called toxicological endpoints), such as the eye, nervous system, reproductive system, and respiratory system. Non-cancer chronic impacts were assessed based on the hazard index (HI). The evaluation of chronic impacts is based on the maximum annual emissions over a 12-month period of construction activity. The chronic HI is calculated by dividing the maximum modeled annual average concentration at the maximum impacted sensitive receptor by the recommended exposure limit (REL). The REL is the concentration at or below which no adverse health effects are anticipated. For example, OEHHA has recommended

an ambient concentration of 5 µg/m^3 as the chronic inhalation REL for DPM exhaust. Therefore, a sensitive receptor exposed to an annual average DPM concentration of 5 µg/m^3 or less would not result in a chronic impact. The chronic health impact with the maximum HI for the same target organ system is used for health risk determination.

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. Impacts would be significant if the project would:

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

Construction Emissions Thresholds

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

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

Operational Emissions Thresholds

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

- Emit (from all sources, both stationary and mobile) more than 55 pounds per day for ROC or NO_X, or more than 80 pounds per day for PM_{10}.
- Emit more than 25 pounds per day of NO_X or ROC from motor vehicle trips only.
- Exceed the health risk public notification thresholds adopted by the SBCAPCD Board (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than 1.0 for non-cancer risk).

- Be inconsistent with the latest adopted in federal and state air quality plans for Santa Barbara County.

The SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* state that due to the relatively low background ambient CO levels in Santa Barbara County, localized CO impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards. As such, CO hotspot analyses are not required.

Toxic Air Containments Thresholds

SBCAPCD has developed significance thresholds for the emissions of TACs based on health risks associated with elevated exposure to such compounds. For carcinogenic compounds, cancer risk is assessed in terms of incremental excess cancer risk. A project would result in a potentially significant impact if it would generate an incremental excess cancer risk of 10 in one million (1×10^{-6}) Additionally, non-carcinogenic health risks are assessed in terms of a hazard index. A project would result in a potentially significant impact if it would result in a chronic and acute hazard index greater than 1.0 (SBCAPCD 2022).

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT 2022 OZONE PLAN. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

A project would be consistent with the 2022 Ozone Plan if its direct and indirect emissions have been accounted for in the 2022 Ozone Plan's emissions forecast assumptions and if it would incorporate the standard fugitive dust control measures recommended by SBCAPCD during construction activities. The 2022 Ozone Plan's direct and indirect emissions inventory for the County as a whole is reliant on population projections provided by the Santa Barbara County Association of Governments (SBCAG). SBCAG generates population projections based on local General Plans. In this case, SBCAG utilized population projections contained in the City of Goleta General Plan, which are based on existing and anticipated land uses in the City including development of the project site at the proposed intensity of development specified in the project plans.

The 2022 Ozone Plan is based on countywide employment data provided by the California Department of Finance. The 2022 Ozone Plan also states that its growth projections are similar to that of the 2019 SBCAG Regional Growth Forecast 2050, in which assumptions about future land development patterns were used to generate future population and jobs forecasts for Santa Barbara County (SBCAG 2019). These growth projections for Goleta are shown in Table 4.2-4.

Table 4.2-4 SBCAG Population and Job Projections for Goleta

Year	Population Forecast	Job Forecast
2020	32,200	25,580
2025	32,500	27,210
2030	33,100	27,970
2035	33,700	28,740
2040	34,300	29,540
2045	34,500	30,290
2050	34,700	31,070

Source: SBCAG 2019

The proposed project would involve the construction and operation of an industrial warehouse building. The proposed project has no residential or commercial uses and would not directly increase population growth. However, the proposed project could potentially increase the number of new employees in Goleta. The project is estimated to add approximately 75 new employees. Although project employees would likely be drawn from the existing labor pool in the region and may not relocate to the city, the analysis conservatively assumes that all 75 new employees would become new residents. In a conservative scenario, there would be a population growth of 198 based on the city's average persons per household of 2.64. Goleta has a current population of approximately 32,591 persons (California Department of Finance [DOF] 2022). SBCAG's growth forecast estimates that the population in Goleta would increase from an existing population of 32,591 residents to 34,700 residents by 2050. In addition, the growth forecast estimates that jobs would increase from 25,580 jobs in 2020 to 31,070 jobs by 2050. The population in Goleta would increase by 2,109 residents by 2050, and the jobs in Goleta would increase by 5,490 jobs by 2050. Therefore, the addition of 75 employees and 198 new residents to Goleta would be accommodated, and the project would not exceed SBCAG's growth forecasts of population and jobs for Goleta (SBCAG 2019).

In addition, in accordance with standard practices in the City, the following standard SBCAPCD fugitive dust control measures, in the *Scope and Content of Air Quality Sections in Environmental Documents*, would be required for project implementation:

- During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site and from exceeding SBCAPCD's limit of 20 percent opacity for greater than three minutes in any 30-minute period. 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 shall be required whenever the wind speed exceeds 15 miles per hour (mph). Reclaimed water shall be used whenever possible. However, reclaimed water shall not be used in or around crops for human consumption.
- The amount of disturbed area shall be minimized.
- On-site vehicle speeds shall be no greater than 15 mph when traveling on unpaved surfaces.
- A track-out prevention device shall be installed and operated where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel washing systems.
- If stockpiling of material is involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation.

- After clearing, grading, earth moving or excavation is completed, the disturbed area shall be treated by watering, or using roll-compaction, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All driveways and sidewalks to be paved/surfaced shall be completed as soon as possible.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off-site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SBCAPCD prior to grading/building permit issuance and/or map clearance.
- The project applicant shall comply with SBCAPCD Rule 345: Control of Fugitive Dust from Construction and Demolition Activities, including all applicable standards and measures therein.

Therefore, the proposed project would be consistent with the applicable air quality plan, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Impact AQ-2 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE SOUTH CENTRAL COAST AIR BASIN REGION IS IN NONATTAINMENT UNDER APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARDS. THEREFORE, IMPACTS RELATED TO CONSTRUCTION AND OPERATION WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Construction

Construction-generated emissions are temporary and short-term. Construction activities such as demolition, grading, construction worker travel to and from the project site, delivery and hauling of construction supplies and debris to and from the project site, hauling of import soil to the site, and fuel combustion by on-site construction equipment would generate emissions of O_3 precursors (ROC and NO_X), CO, SO_2, and fugitive dust (PM_{10} and $PM_{2.5}$).

Table 4.2-5 summarizes construction emissions that would be generated from the project. As shown therein, construction emissions would not exceed the SBCAPCD construction thresholds used by the City of Goleta for this analysis. Therefore, project construction would not contribute substantially to an existing or projected air quality violation and impacts would be less than significant.

Table 4.2-5 Estimated Annual Construction Emissions

Construction Year	Annual Emissions (tons per year)					
	ROC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
2027	<1	1	1	<1	<1	<1
2028	<1	1	1	<1	<1	<1
Overlap						
Utility Pipelines	<1	1	1	<1	<1	<1
Maximum Annual Emissions	**1**	**2**	**2**	**<1**	**<1**	**<1**
Threshold	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: All emissions modeling was completed using CalEEMod. See Appendix C for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulations (including SBCAPCD Rules 345, 323.1, and 329).

Operation

Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Table 4.2-6 summarizes the project's operational emissions by emission source (area, energy, and mobile). As shown therein, the emissions generated by the operation of the proposed project would not exceed County operational thresholds used by the City of Goleta for this analysis. Therefore, project operation would not contribute substantially to an existing or projected air quality violation and impacts would be less than significant.

Table 4.2-6 Estimated Operation Emissions

	Maximum Daily Emissions (pounds per day)					
Emissions Source	**ROC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area	2	<1	3	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	1	3	<1	1	<1
Total	**3**	**1**	**6**	**<1**	**1**	**<1**
Threshold (area + energy + mobile)	55	55	N/A	N/A	80	N/A
Threshold Exceeded?	No	No	N/A	N/A	No	N/A
Threshold (mobile only)	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: All emissions modeling was completed using CalEEMod. See Appendix C for modeling results. Some numbers may not sum precisely due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulations (including SBCAPCD Rule 323.1) and project design features. Emissions presented are the highest of the winter and summer modeled emissions.

Mitigation Measures

No mitigation measures are required.

Threshold 3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 PROJECT CONSTRUCTION, OPERATION, OR THE COMBINED CONSTRUCTION AND OPERATION TAC EMISSIONS WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT EMISSIONS. IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT.*

Sensitive receptors are facilities or land uses that include members of the population who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. According to CARB, sensitive receptors are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (CARB 2005). The nearest sensitive receptors are residential mobile homes located approximately 325 feet east of the project site across State Route 217. In addition, single-family residences are located approximately 340 feet west of the project site (Corta/Placencia area).

Construction Impacts

Construction-related activities would result in temporary project-generated DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. Results of the analysis were compared to SBCAPCD thresholds for a cancer risk threshold of 10 in one million persons, and a chronic Hazard Index significance threshold of 1.0. Since DPM is not associated with acute health risks (OEHHA 2022), acute risk was not evaluated in this construction HRA.

Based on the applicant-provided construction schedule, project construction is anticipated to begin in July 2027 and end in September 2028. Project construction would be phased, and each construction

phase would be periodic and short-term. Project-related TAC emissions would cease with the completion of construction activities. The detailed results of the construction HRA are provided in Appendix P and summarized below.

The maximum unmitigated risk from construction of the proposed project was identified for all sensitive receptors within 1,000 feet of the project site boundary as detailed in Appendix P of the EIR. The maximum off-site residential cancer risk would be 0.86 in one million at one of the mobile homes east of the project site across SR-217. In addition, the chronic risk at the maximum off-site receptor would be exposed to a hazard index of 0.02. These maximum cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or hazard index of 1 for chronic risk. Given that neither the cancer risk nor the chronic risk would exceed regulatory thresholds, health risk from construction of the proposed project would be less than significant.

Operational Impacts

CARB's *Air Quality and Land Use Handbook* (2005) recommends siting sensitive receptors more than 1,000 feet away from distribution centers that generate more than 100 diesel-fueled truck round trips per day. Air modeling analysis performed by CARB and SCAQMD showed an 80 percent drop off from diesel particulate emissions from large distribution centers at approximately 1,000 feet (CARB 2005). The proposed project would generate approximately 14 truck round trips per day (28 one-way truck trips) to the project site, based on the Traffic and Circulation Study prepared by Associated Transportation Engineers. These trips are assumed to all be diesel-fueled heavy-heavy-duty truck trips. An operational HRA was performed to conservatively estimate health risk during the proposed project's operating hours.

The maximum unmitigated risk from operation of the proposed project was identified for all sensitive receptors within 1,000 feet of the project site boundary and along the truck route on South Kellogg Avenue and Hollister Avenue as detailed in Appendix P of the EIR. The nearest sensitive receptors along the truck route are adjacent to South Kellogg Avenue at the Winslowe townhomes, which would have the maximally exposed individual receptor. In addition, the proposed project's truck path is approximately 325 feet west of residential mobile homes across State Route 217. A receptor at Winslowe townhomes would be exposed to a cancer risk of 0.08 in one million, due to the receptors being adjacent to the truck route. In addition, the maximally exposed individual receptor chronic risk would have a hazard index of <0.0001. These maximum operational cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or a hazard index of 1 for chronic risk. In addition, the proposed project would generate 14 truck round trips per day, well below CARB's threshold of 100 diesel-fueled round truck trips per day. Therefore, the project is consistent with CARB's siting recommendations for TAC emitting sources. Furthermore, idling of each truck would be limited to five consecutive minutes and operation of diesel-fueled internal combustion engine auxiliary power systems would not be allowed for greater than five minutes within 100 feet of residences pursuant to 13 California Code of Regulations Section 2485. Given that neither the cancer risk nor the chronic risk would exceed regulatory thresholds and the proposed project's consistency CARB's siting recommendations from TAC sources, the health risk from the operation of the proposed project would be less than significant.

Combined Construction and Operational Impacts

The maximum unmitigated combined risk from construction and operation of the proposed project was identified for all sensitive receptors within 1,000 feet of the project site boundary and along the truck route on South Kellogg Avenue as detailed in Appendix P of this EIR. As described in Section 4.2.3.a, the combined health risk assessment considers overlapping construction and operation for the 3rd trimester and 0-2 year age groups, in order to provide a more conservative analysis. Under this scenario, the sensitive receptor across SR-217 at the mobile home park would be exposed to a cancer risk of 0.89 in one million. In addition, the residential receptor chronic risk would have a hazard index of 0.02. These maximum cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or 1.0 for chronic risk. Given that neither the cancer nor chronic risk would exceed regulatory thresholds, combined health risk from construction and operation of the proposed project would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-4 THE PROPOSED PROJECT WOULD NOT RESULT IN OTHER EMISSIONS (SUCH AS THOSE LEADING TO ODORS) THAT WOULD ADVERSELY AFFECT A SUBSTANTIAL NUMBER OF PEOPLE. THEREFORE, IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The project would generate oil and diesel fuel odors during construction from equipment use. The odors would be limited to the construction period and would be intermittent and temporary. Furthermore, these odors would dissipate rapidly with distance from in-use construction equipment. Accordingly, project construction would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people, and impacts would be less than significant.

The SBCAPCD *Scope and Content of Air Quality Sections in Environmental Documents* (2022) states that certain projects have the potential to cause significant odor impacts because of the nature of their operation and their location. Examples include fast food restaurants, bakeries, and coffee roasting facilities. In addition, wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. The proposed project includes an industrial warehouse and would not include industrial use development associated with odor complaints near sensitive receptors. In addition, it is likely project odors would not be distinguishable due to vehicle exhaust on State Route 217. Therefore, operation of the project would not generate other emissions, such as those leading to odors, that would affect a substantial number of people. Operational odor impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.2.4 Cumulative Impacts

Air quality emissions in one location contribute to regional air quality in the SCCAB. Therefore, the geographic scope for considering cumulative impacts to air quality includes the entire SCCAB, which is comprised of San Luis Obispo, Santa Barbara, and Ventura Counties as stated earlier in this section. Air pollution may combine with other cumulative projects (past, present, and reasonably foreseeable future) to violate criteria pollutant standards if the existing background sources cause nonattainment conditions, as they do according to the state standards for Ozone in the SBCAPCD. Air districts manage attainment of the criteria pollutant standards by adopting rules, regulations, and attainment plans, which comprise a multifaceted programmatic approach to such attainment.

Air pollution is largely a cumulative issue, and SBCAPCD has provided guidance on the subject of cumulative impacts. The SBCAPCD *Environmental Review Guidelines and Scope and Content of Air Quality Sections in Environmental Documents* include recommendations for the analysis of cumulative impacts pertaining to ozone and localized pollutants. Inconsistency with the Ozone Plan is considered a cumulatively adverse air quality impact. As shown in Table 3-1, in Section 3.1, *Environmental Setting*, the planned, pending, and reasonably foreseeable projects within Goleta, at the time of this project, would include the construction of a total of 469 residential units. Therefore, based on the Department of Finance's 2.64 persons per household in Goleta, the cumulative growth for the project area would be approximately 1,239 residents. Thus, cumulative development in Goleta would be accommodated from the 2050 population growth increase of 2,109 from existing conditions. Future cumulative development would not exceed the 2022 Ozone Plan growth assumptions and would not result in cumulatively considerable project emissions. In addition, the project is consistent with the current 2022 Ozone Plan growth projections and criteria pollutant emission thresholds. The proposed project's development would consist of an industrial warehouse building, parking lot, and on-site utility pipelines by the anticipated buildout year (2028). The proposed project would accommodate regional growth consistent with the SBCAG 2050 population forecast. As described in Impact AQ-2 above, the proposed project's daily emissions of construction and operation of related pollutants would not exceed SBCAPCD regional thresholds; therefore, the project's contribution to cumulative air quality impacts would not be cumulatively considerable.

According to the SBCAPCD's *Environmental Review Guidelines,* a project's potential contribution to cumulative impacts is assessed utilizing the same significance criteria as those for project specific impacts, which is if the project would generate an incremental excess cancer risk of 10 in one million non-carcinogenic health risks resulting in a chronic and acute hazard index greater than 1.0. In addition, SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* states a project will not have a significant impact on air quality cumulatively if it does not exceed those same thresholds. The guidelines also state that the contribution of project emissions in conjunction with existing and proposed projects in the local area may be considered. As described under Impact AQ-3 above, TAC emissions during construction and operation of the proposed project would expose the maximum off-site residential receptor to a cancer risk of 0.86 in one million and 0.08 in one million, respectively, well below the threshold of 10 in one million. In addition, the chronic risk during construction and operational activities would be below the hazard index threshold of 1.0. As shown in Table 3.1 of Section 3, *Environmental Setting*, of this EIR, several projects could be under construction within 1,000 feet from the project site and potentially overlap with the project's construction activity. In addition, industrial projects north of the project site could generate additional truck trips along the project's truck route on South Kellogg Avenue during project operations. These cumulative projects could expose sensitive receivers to cancer risks exceeding SBCAPCD's 10 in one million threshold for cancer risk or 1.0 acute hazard index for noncancer risk; however, similar to the

proposed project, cumulative projects would be required to comply with SBCAPCD regulations and thresholds to reduce the potential for significant impacts to sensitive receptors. As stated in SBCAPCD's *Environmental Review Guidelines* and *Scope and Content of Air Quality Sections in Environmental Documents,* a project's potential contribution to cumulative impacts is assessed utilizing the same significance criteria as those for project specific impacts. Therefore, with each cumulative project complying with the project-specific thresholds, the proposed project's contribution to localized health risk from construction and operational emissions would not be cumulatively considerable.

Cumulative projects would adversely affect sensitive receptors from odor emissions if cumulative projects were typical odor-producing land uses. Construction of cumulative projects would result in construction equipment-related odors; however, the temporary nature of construction would ensure less than significant cumulative odor impacts. In addition, it is likely project odors would not be distinguishable due to vehicle exhaust on State Route 217. The project is not identified as an odor producing facility nor are there developments near the project site that would produce significant odors. Therefore, cumulative odors from the surrounding area from construction and operations would not combined at the same receptors, and the project's cumulative contribution to cumulative odor emission impacts would not be considerable.

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4.3 Biological Resources

This section identifies biological resources in the study area and on the project site and assesses the project's impacts on those resources. For purposes of this analysis, the project site includes the project site parcel boundary (Assessor's Parcel Number 071-190-035), while the study area, shown later in Figure 4.3-1, includes the project site plus a 300-foot buffer. The development area includes the proposed area of disturbance, which is the portion of the project site where the proposed industrial building (including drainage and utility improvements) would be constructed.

The discussion of biological resources incorporates the results of 2017, 2022, and 2023 reconnaissance-level surveys and jurisdiction delineations. The surveys were conducted by Rachael Tierney Consulting in 2017 and Watershed Environmental Inc. (Watershed Environmental) in 2022 and 2023. The following biological studies and surveys, included in Appendix D, are incorporated herein by reference:

- Appendix D-1: Biological Report Goleta Business Center 907 S. Kellogg Avenue, Goleta, California 93117, prepared by Rachel Tierney Consulting, dated March 28, 2018 (Rachel Tierney Consulting 2018)
- Appendix D-2: Update to February 20, 2023, Biological Report Amendment for Goleta Business Park Project at 907 S. Kellogg Avenue, Goleta, California, prepared by Watershed Environmental dated May 12, 2023 (Watershed Environmental 2023a)
- Appendix D-3: Wetland Delineation Report for the Goleta Business Park Project prepared by Watershed Environmental, dated May 12, 2023 (Watershed Environmental 2023b) (Wetland Delineation Report)

4.3.1 Environmental Setting

a. Regional Setting

The study area is located in Santa Barbara County, within the Santa Ynez—Sulphur Mountains subsection of the Southern California Coast. This ecological unit extends from the Santa Ynez River mouth in northern Santa Barbara County, south and east to the Sulphur Mountains in northern Ventura County. This ecological unit is generally defined by its topography and geography. Locally, the Santa Ynez Mountains to the north of the study area are comprised of relatively steep hillsides vegetated by native chaparral and drained by incised streams, along which grow bands of riparian shrubs and woodlands.

The presence and proximity of the Santa Ynez Mountains adjacent to the Pacific Ocean influence climatic conditions by forcing moving air upwards and causing an increase in precipitation along the coastal plain. The Mediterranean climate of the Goleta region produces moderate average temperatures, although extreme temperatures can be reached in the winter and summer. The warmest months of the year are August and September, and the coldest month is January. The annual average maximum temperature is 69.3 degrees Fahrenheit (°F), while the annual average minimum temperature is 48.6°F (Western Regional Climate Center 2016).

Much of the coastal plain in the Goleta area between the Santa Ynez Mountains and the Pacific Ocean has been developed or has been historically disturbed by agriculture or ranching uses. The habitats and wildlife resources of the area reflect those typically found in the coastal plains of Southern California. They include resources such as monarch butterfly (*Danaus plexippus*) aggregations and

overwintering habitat, raptor nests, coastal estuaries, vernal pools and other wetlands, riparian corridors, and other habitats and associated wildlife. In the City of Goleta, relatively undisturbed native habitats are present along narrow riparian corridors, in scattered undeveloped lands of varying sizes, and in protected open space areas such as Ellwood Mesa Open Space and Lake Los Carneros (City of Goleta 2009).

The study area is at the easternmost edge of the historic Goleta Slough. During the late Pleistocene and continuing into relatively recent times, gradually rising sea levels filled in the valley, producing a navigable embayment of 18 square miles, possibly continuous with what is now Devereux Slough (Goleta Slough Management Committee [GSMC] 2015). Goleta Slough was a large harbor before 1861 when an enormous flood caused siltation that filled much of the harbor and created a shallow lagoon. In the late nineteenth century, heavy cattle grazing along the surrounding foothills, followed by wide-ranging wildfires, heavy rains, and flooding caused excessive erosion and deposition of sediment in the mouths of the creeks emptying into Goleta Bay. Over time, sedimentation transformed the lagoon into a coastal salt marsh, which has been reduced in size by further siltation and land-filling to accommodate development, such as the Santa Barbara Municipal Airport. During the development of the Santa Barbara Municipal Airport and other parcels in the area, the waterways and marshes of the slough were diked, drained, diverted, and channelized into five main waterways that exist today: Atascadero Creek, San Jose Creek, San Pedro Creek, Los Carneros Creek, and Tecolotito Creek (California Coastal Commission [CCC] 2022).

The study area is within the 47.4-square-mile Goleta Slough Watershed, which is fed by five major streams mentioned above: the Atascadero, San Pedro, and San Jose creeks (which meet near the mouth of the slough) and the Los Carneros and Tecolotito creeks (which meet "upstream" and north of the slough mouth). The project site is in the Goleta Slough Ecosystem Management Plan boundary that generally follows the Coastal Zone in the City of Goleta and the project site is considered part of the "Fairview Industrial Parcels" (GSMC 2015, Figure 1-2-W).

The 440-acre CDFW Goleta Slough Ecological Reserve was designated in 1983 and begins approximately 0.50 miles southwest of the study area (CDFW 2014). The Goleta Slough is a large expanse of open water and estuarine/wetland habitats that support a rich and diverse coastal ecosystem of biological and cultural importance and provides important ecosystem services, such as floodwater storage capacity and the filtering of pollutants contained in stormwater runoff. The Goleta Slough is the northernmost example of a large Southern California estuary and represents the northern limit of distribution for several plant and animal species (GSMC 2015). The Goleta Slough contains breeding populations of listed species, such as the state-listed endangered Belding's savannah sparrow *(Passerculus sandwichensis beldingi* [BSS]) and federally listed endangered tidewater goby (*Eucyclogobius newberryi*), as well as other species of federal, California, and local concern.

b. Project Site and Study Area Setting

A drive-in movie theater was built on the project site in 1966 and is not currently in operation. Existing structures on the project site include a drive-in theater, concessions building, movie screen, three ticket booths, projector building, pad-mounted transformer, storm drain, agricultural box, and two dewatering wells. A paved access road runs along the northeastern project site boundary. The remainder of the project site is primarily flat and contains degraded asphalt and a row of trees at the southwest border of the project site. San Jose Creek is located along the eastern project site boundary.

Prior to 1966, the property was farmed to grow row crops; a portion was planted in walnut or lemon trees. Historically, the property was part of the greater Goleta Slough and was probably a brackish or saltwater marsh (Watershed Environmental 2023b). Gradually, the Goleta Slough was drained, the creeks that fed into the slough were channelized, and fill dirt was imported to create upland farmland and subsequently developed. Finally, the construction of Ward Memorial Boulevard (State Route 217) and the development of Goleta Beach County Park in the 1960s eliminated extensive areas of upper marsh, dunes, and wetland-to-upland transition zones, as well as transitional habitats between estuarine and marine environments at the mouth of Goleta Slough (Rachel Tierney Consulting 2018).

Soils

Study area soils are mapped Camarillo fine sandy loam (Ca), a poorly drained, sandy, clay loam occurring on 0 to 2 percent slopes in flood plains. This soil is classified as having moderate permeability and a very slow runoff rate. The NRCS lists this soil as hydric.[1] The terrain is compacted from years of vehicles crisscrossing during public market setup and drive-in theater use (Watershed Environmental 2023b).

Watershed

The study area is in the San Pedro Creek watershed (HUC 180600130202), which includes San Pedro, San Jose, Los Carneros, and Tecolotito creeks and their tributaries and drains approximately 27.6 square miles. Where tidally influenced these creeks are part of the Goleta Slough, which drains to the Pacific Ocean at Goleta Beach County Park 0.45 miles south of the study area. The lower section of San Jose Creek, including the segment adjacent to the project site, is subject to tidal inundation when the creek mouth is not blocked by sand.

Downstream of Hollister Avenue, San Jose Creek flows to Goleta Slough through a concrete-lined flood control channel constructed in the early 1960s. The alignment of the flood control channel parallels State Route 217, routing flows away from the prior alignment of lower San Jose Creek. This abandoned portion of the creek, now known as Old San Jose Creek, still functions to provide local drainage of the surrounding developed area. Both drainages are mapped as a Streamside Protection Areas (SPA) under the City of Goleta General Plan/Coastal Land Use Plan (General Plan) Conservation Element (CE) Figure 4-1 as shown in Figure 4.2-3. Given the history of these two drainages the hydrology and habitat differ considerably as discussed below.

San Jose Creek

As shown in Figure 4.3-1 through Figure 4.3-3, San Jose Creek is located along the eastern project site boundary. San Jose Creek, adjacent to the project site and within the location of the proposed drainage outfall, is confined within a concrete channel at the edge of the tidal influence in the northern portion of the study area. San Jose Creek transitions to a tidal wetland with a bottom of mud, silt, or similar fine particles in the southern portion of the study area, downstream of the location of the proposed outfall. The National Hydrography Dataset depicts the study area section of San Jose Creek as a perennial (year-round) stream. San Jose Creek generates a 3,240 cubic feet per second (cfs) flood flow during a 100-year return interval flow event (City of Goleta 2020).

[1] A hydric soil is a soil that is saturated, flooded or ponded long enough during the growing season to develop anaerobic conditions in the upper part of the soil profile that favor the growth and regeneration of hydrophytic vegetation. The USDA prefaces the hydric soils information with the acknowledgement that because listed soil includes both large and small percentages of hydric areas, in some cases, most of the map unit may not be hydric.

Below the high tide line San Jose Creek is a perennial (year-round) stream due to tidal influence. The "mean high water" elevation in Goleta Slough and the lower segment of San Jose Creek is 4.51 feet, and the "mean higher high water" elevation is 5.27 feet (GSMC 2015). The freshwater channel is intermittent (seasonal). According to the San Jose Creek stream gauge (USGS Station 11120500), the creek flows between November and May with a volume dependent upon rainfall (Watershed Environmental 2023a).

The Santa Barbara County Flood Control District (SBFCD) maintains a 5-foot-wide maintenance strip between the creek and the project site and a 15-foot access road along San Jose Creek. SBCFCD routinely dredges San Jose Creek and its neighboring creeks, up to about 1 mile from the mouth, and also breaches the berm at the mouth to maintain water quality in the slough. SBFCD accesses San Jose Creek from a concrete ramp in the study area, adjacent to the location of the proposed outfall, located at the approximate upper limit of the tidal influence. An average of 3,630 cubic yards of sediment have been removed each year from San Jose Creek as part of flood control maintenance (CCC 2022).

As part of the construction of a fish passage and channel capacity project in 2014, low flow fish-passage elements were installed along the eastern side of the channel in the study area north of the concrete ramp. The fish passage structures provide some in-channel variability, which helps to modestly slow flows and locally trap sediment. These structures add some geomorphic value relative to more typical concrete reaches, but geomorphic value of this reach remains low overall (City of Goleta 2020).

Existing disturbance to San Jose Creek aquatic habitat primarily results from annual flood-control maintenance, which minimizes the recruitment of large woody debris, aquatic vegetation, and establishment of a riparian canopy (NOAA 2023a, SBCFCD 2010). In the study area, San Jose Creek is contained within a concrete channel (in the northeastern end of the study area) or a constructed, packed-dirt, linear, open channel with a rock-armored toe (within the southern end of the study area). Plant associations on the west bank are primarily weedy (non-native grasses, tobacco tree [*Nicotiana glauca*] but also contain scattered native plants (quailbush [*Atriplex lentiformis]*, telegraph weed [*Heterotheca grandiflora*]). Most cover is found outside the top of bank, primarily due to recent undercutting along the entire stretch. However, a single arroyo willow (*Salix lasiolepis*) and a single blue elderberry (*Sambucus nigra ssp. caerulea*) are established on the upper creek slope near the northernmost boundary of the project site. The remainder of vegetation along the eastern side of San Jose Creek, opposite the project site, consists of non-native grasses, weeds, and scattered native shrubs (coyote brush [*Baccharis pilularis]*, saw-tooth goldenbush [*Hazardia squarrosa*]). The eastern slope sustains a windrow of arroyo willow. Willow is established beyond the top of bank for about 10 feet but is contained within a fence parallel to Ward Memorial Boulevard. Outside this fence, southeast of the willows, is a row of oleander (*Nerium oleander*), a common landscape shrub.

San Jose Creek within the study area is designated as critical habitat for the Southern California steelhead (south ecological unit) (*Oncorhynchus mykiss irideus;* Federally Endangered, state candidate) (steelhead) and the tidewater goby. Because the flood control channel was considered impassible for steelhead, it was redesigned and widened in 2014 to allow for steelhead passage upstream (City of Goleta 2020). The United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) mapping is depicted in Figure 4.3-2 (Watershed Environmental 2023a). The San Jose Creek in the study area south of the access ramp is mapped as a marine and tidal brackishwater habitat continuously covered with tidal water; with mud, silt, or similar fine particles covering at least 25 percent of the bottom; and less than 30 percent vegetative cover. Two narrow strips of vegetation on either side of the marine habitat are mapped in NWI as nontidal wetlands with herbaceous hydrophytes usually dominated by perennial plants and covered in tidal and fresh surface water. The

segment of San Jose Creek north of the access ramp is mapped in NWI as channelized with a concrete bed as an intermittent (seasonally flooded) wetland within an excavated channel.

Old San Jose Creek

As shown in Figure 4.3-2, Old San Jose Creek is located west and southwest of the project site. Old San Jose Creek is a relict channel that once conveyed the course of San Jose Creek but was abandoned when San Jose Creek was diverted to its current course. While it is disconnected from the upper watershed of San Jose Creek, Old San Jose Creek collects and conveys local runoff and connects to San Jose Creek via a SBCFCD headwall and culvert south of the project site. Old San Jose Creek was excavated from dry land in the 1920s to divert San Jose Creek into a farming area. In 1965 San Jose Creek was diverted again, and its current concrete channel was constructed between Hollister Avenue and Goleta Slough. This diversion abandoned the Old San Jose Creek channel, disconnecting it from flows coming down San Jose Creek north of Hollister Avenue. Where Old San Jose Creek terminates at San Jose Creek a SBCFCD headwall contains two manually-operated flaps installed high on the wall. Flaps are opened during heavy storms to direct some water from San Jose Creek into Old San Jose Creek, thus creating a water storage feature out the last reach of Old San Jose Creek. Due to the elevation of the banks, the potential height of high water within Old San Jose Creek is lower than that in San Jose Creek (Tierney Consulting 2018). Old San Jose Creek is separated from the project site by an earth and rock berm and a dirt access road.

Old San Jose Creek is not mapped as a drainage or flowline in the National Hydrography Dataset (USGS 2023). Old San Jose Creek in the west and southwest portion of the study area is mapped by NWI as an intermittent wetland that is rarely seasonally flooded, surrounded by herbaceous hydrophytes. In the study area south of Placencia Street the riparian canopy is constrained by development and narrows from a 175 foot width to a 50 foot width.

Goleta Slough

A portion of the study area south of Old San Jose Creek between San Pedro Creek and San Jose Creek extends onto a parcel owned by the Southern California Gas Company mapped in the NWI as an estuarine and marine wetland. It contains herbaceous hydrophytes usually dominated by perennial plants and is alternatively flooded and exposed daily by the tides when the slough mouth is open (Figure 4.3-2).

Vegetation and Land Cover

Figure 4.3-1 depicts vegetation communities mapped in the study area, project site, and development area. These communities are summarized in Table 4.3-1 and discussed in further detail below. The vegetation communities are mapped based on current field conditions and classified to the alliance or association level based on the *A Manual of California Vegetation, Second Edition* (Sawyer et al. 2009) (MCV2) and the most recent California Department of Fish and Wildlife (CDFW) California Natural Communities List (CDFW 2023a).

As shown in Table 4.3-1, four sensitive plant communities are present in the study area but not on the project site. The sensitive communities depicted in Figure 4.3-1 include Arroyo Willow Thickets, Cottonwood/Arroyo Willow Riparian, Pacific Willow/Arroyo Willow Riparian Woodland, and Pickleweed Mats.

Figure 4.3-1 Vegetation and Land Cover Types

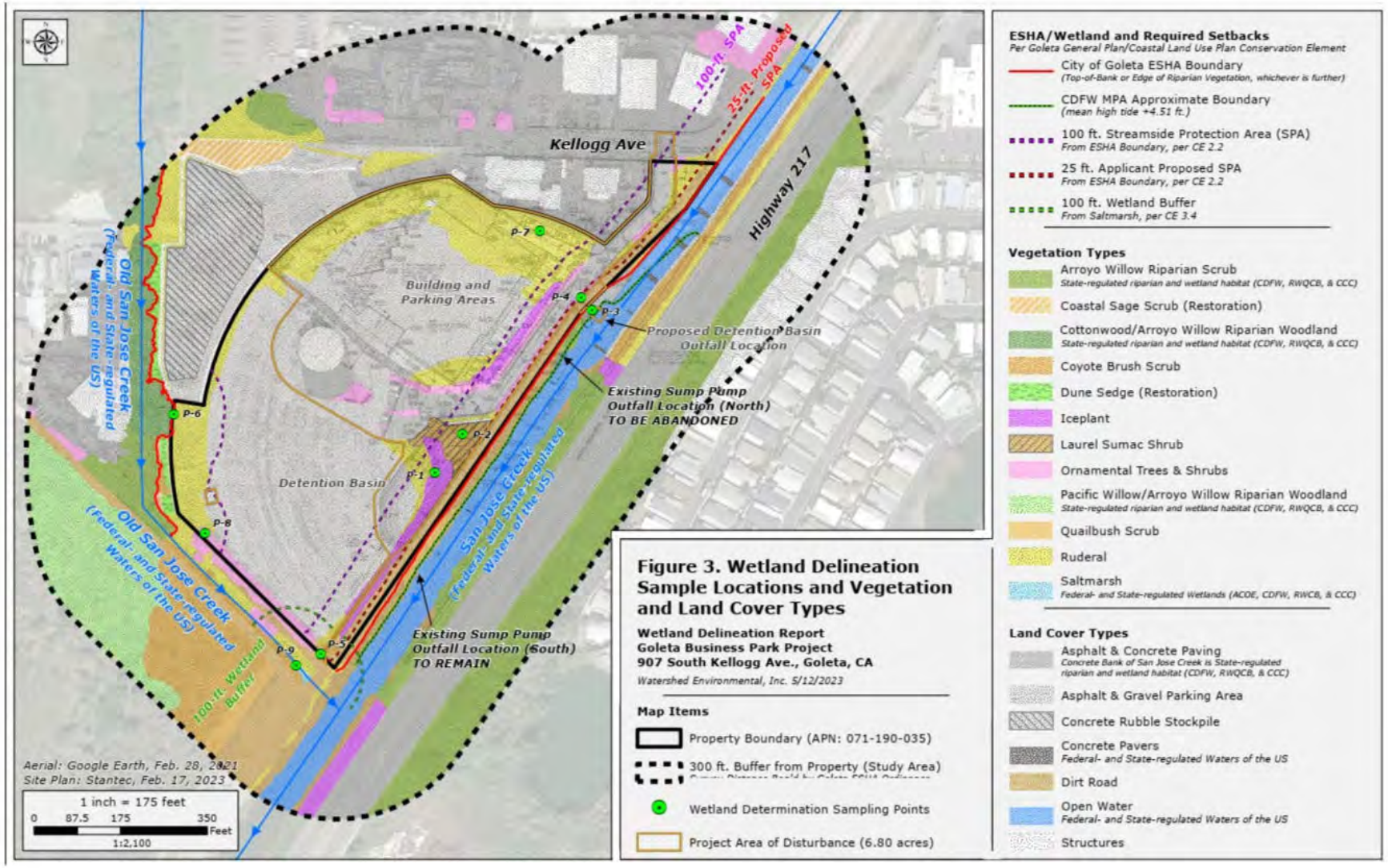


Table 4.3-1 Study Area and Development Area Vegetation and Land Cover

Vegetation Alliances and Land Cover Types	Study Area Acres	Development Area Acres[1]	CDFW Sensitive/ESHA
Native Vegetation and Hydrophytic Communities			
Arroyo Willow Thickets	4.10	0	Y/Y
Cottonwood/Arroyo Willow Riparian Woodland	0.63	0	Y/Y
Pacific Willow/Arroyo Willow Riparian Woodland	1.81	0	
Pickleweed Mats	0.01	0	Y/Y
Open Water (San Jose Creek)	2.39	0.01	N/Y
Concrete Pavers (San Jose Creek Bed)	0.04	0.01	N/Y
Coyote Brush Scrub	1.64	0.01	N/N
Quailbush Scrub	0.24	0	N/N
Laurel Sumac Scrub	0.18	0.18	N/N
Coastal Sage Scrub and Dune Sedge (Security Paving Habitat Restoration Area)	0.43	0	N/Y
Non-Native and Disturbed Communities			
Iceplant	0.61	0.31	N/N
Ornamental Trees and Shrubs	1.02	0.30	N/N
Ruderal	3.63	1.80	N/N
Developed	24.56	4.19	N/N
Grand Total Vegetation and Land Cover Types	**41.29**	**6.80**	

CDFW = California Department of Fish and Wildlife

ESHA – Environmentally Sensitive Habitat Area

[1] Includes the 6.75-acre development area and the outfall and utility trenching

Source Watershed Environmental 2023b (see Appendix D-3)

Most of the project site is covered with degraded asphalt and predominantly lacks native vegetation. Ruderal or weedy non-native species along with a few scattered native plants dominate the project site. Tall *Myoporum laetum* shrubs line portions of the southwestern fence line and are mostly established outside the property line. No native trees are present on the project site.

The CDFW sensitivity ranking is based on the Sensitive Natural Communities of California (CDFW 2023b). Evaluation is done at both the global (full natural range within and outside of California) and state (within California) levels resulting in a single G (global) and S (state) rank ranging from 1 (very rare and threatened) to 5 (demonstrably secure). Natural Communities with ranks of S1-S3 or G1-G3 are considered Sensitive Natural Communities to be addressed in the environmental review processes (CDFW 2023b). Environmentally Sensitive Habitat Area (ESHA) determinations are based on General Plan CE policies, site-specific mapping, and General Plan mapped ESHA shown on CE Figure 4-1 and depicted in the study area under Figure 4.3-3.

Hydrophytic and Riparian Communities

ARROYO WILLOW RIPARIAN SHRUBLAND ALLIANCE (ARROYO WILLOW THICKETS)

Arroyo willow is a riparian tall shrub or tree up to 2.5 feet in height. Leaves are glaucous on the lower surface and elliptical to ovate in shape. Arroyo Willow Thickets (*Salix lasiolepis* Shrubland Alliance)

typically occurs along stream banks and benches, slope seeps, and stringers along drainages from sea level to approximately 7,000 feet in elevation. This alliance is characterized by an open to continuous shrub layer and a variable herbaceous layer. The community is dominated by arroyo willow with over 50 percent relative cover in the tree or shrub layer, and co-dominant species include Fremont cottonwood (*Populus fremontii*), giant reed (*Arundo donax*), and mulefat (*Baccharis salicifolia*). This community consists of dense shrubs or tree canopies covered with variable grass and forb understory.

This community is not present on the project site. In the study area, this community is present sparsely on the banks of San Jose Creek (0.83 acres), with larger intact stands in Old San Jose Creek (3.27 acres). In San Jose Creek the extent of the community of the west bank adjacent to the project site is limited to one individual. The stands in the Old San Jose Creek riparian corridor begin approximately 170 feet southwest of the project site. Arroyo Willow Thickets are a not CDFW sensitive natural community with a rank of G4S4. This community is considered ESHA since mapped in CE Figure 4-1 and is and riparian area under Policy CE 1.2.a.

PACIFIC WILLOW/ARROYO WILLOW RIPARIAN WOODLAND

This community meets the MCV2 classification Arroyo Willow Thicket Alliance, *Salix lasiolepis – Salix lucida* Association since pacific willow (*Salix lucida)* is co-dominant. This community is not present on the project site. This community is located in the study area in the Old San Jose Creek riparian corridor approximately 443 feet southwest of the project site. *Salix lasiolepis – Salix lucida* Association is a CDFW sensitive natural community with a rank of G3S3. This community is outside the City of Goleta and is not mapped as ESHA by Santa Barbara County. However, sensitive communities are considered ESHA under the Eastern Goleta Valley Community Plan (Santa Barbara County 2017).

COTTONWOOD/ARROYO WILLOW RIPARIAN WOODLAND

The Cottonwood/Arroyo Willow Riparian Woodland described by Watershed Environmental meets the MVC2 membership rules for the Black Cottonwood Forest Alliance, *Populus trichocarpa* / *Salix lasiolepis* Association or the Arroyo Willow Thicket Alliance since black cottonwood is co-dominant. This community is not present on the project site.

This community is not present on the project site. This community is located in the study area in the Old San Jose Creek riparian corridor beginning approximately 170 feet west of the development area and 100 feet from the projector building to be removed. The understory vegetation along Old San Jose is generally dense and interspersed with many invasive species, particularly Arundo and cape ivy (City of Goleta 2020). *Populus trichocarpa* / *Salix lasiolepis* Association does not have a CDFW rank but is considered sensitive based on the Alliance ranking of the Black Cottonwood Forest Alliance (G5/S3) and Arroyo Willow Thickets (G4S3). This community is considered ESHA under Policy CE 1.2.a and is mapped ESHA in CE Figure 4-1.

SALTMARSH (PICKLEWEED MATS)

Categorized under MVC2 as the *Salicornia pacifica (Salicornia depressa)* Herbaceous Alliance (Pickleweed Mats) and Holland (1986) as Southern Coastal Marsh, this community is typically found along coastal salt marshes and alkaline flats between 0 to 6 feet in elevation. It is recognized by the USACE as an obligate wetland plant.

This community is not present on the project site. This community is present in Old San Jose Creek the study area south of the project site. Present at the terminus of the historic Old San Jose Creek channel dominated by pickleweed (*Saliconia pacifica*) and alkali heath (*Frankenia grandiflora*). This

community is probably a result of brackish water from San Jose Creek entering the Old San Jose Creek channel when the SBCFCD headwalls are opened. Salinity intrusion may be occurring through the soil (Tierney Consulting 2018). This community was present in San Jose Creek south of the project site prior to recent dredging (Watershed Environmental 2023b). Pickleweed Mats are a CDFW sensitive natural community with a rank of G4S3 and are considered ESHA under Policy CE 1.2a and Policy CE 3.

OPEN WATER (SAN JOSE CREEK)

The portion of the study area that comprises the flowing water in the San Jose Creek channel is characterized as Open Water. This land cover is devoid of vegetation and is not identified in MCV2. San Jose Creek consists of tidal and intermittent riverine classifications as shown in Figure 4.3-2. This community is present in the development area in the location of the proposed drainage outfall (0.01 acres) and in the study area in the San Jose Creek channel. Open Water is considered ESHA, specifically a SPA, under Policy CE 1.2.a and Policy CE 2.

CONCRETE PAVERS (SAN JOSE CREEK BED)

The land cover consists of concrete pavers in the San Jose Creek bed, likely installed in 2014 when the cement channel was last improved. No vegetation is present in this community. The pavers retain the creek bank are not associated with fish passage improvements. This community is present in the development area in the location of the proposed drainage outfall (0.01 acres) and in the study area in San Jose Creek channel. This land cover is considered ESHA, specifically a SPA, under Policy CE 1.2.a and Policy CE 2.

Upland Habitats

BACCHARIS PILULARIS (COYOTE BRUSH SCRUB) ALLIANCE

Coyote Brush Scrub (*Baccharis pilularis* Shrubland Alliance) may occur on coastal bluffs, terraces, stabilized dunes of coastal bars, spits along the coastline, river mouths, stream sides, open exposed slopes, ridges, and gaps in forest stands. Soils are variable, ranging from sandy to relatively heavy clay, between sea level and approximately 5,000 feet in elevation. This native vegetation community is characterized by having coyote brush as dominant or co-dominant in the shrub layer (>30 to 50 percent relative cover). This community is dominated by coyote brush with co-dominate quailbush, California sagebrush (*Artemisia californica*) or blue elderberry occurring as dense cover stands. Coyote brush is an early native colonizer after disturbance.

Coyote Brush Scrub is mapped in a small portion of the project site within the development area (0.01 acres) where utility trenching is proposed. In the study area this community is present along the SBCFCD easement, in the San Jose Creek bank, adjacent to Old San Jose Creek, and on the Southern California Gas Company property. Species present in the shrub layer include blue elderberry, California sagebrush, sawtooth goldenbush, and black sage (*Saliva mellifera,* outside the development area). The understory is dominated by invasive species such as black mustard (*Brassica nigra*) and in the shrub layer invasive *Myoporum*. In the study area east of the project site this community is subject to disturbance from SBCFCD creek dredging and stockpiling (Watershed Environmental 2023a).

Coyote Brush Scrub receives the lowest rarity ranking (CDFW ranked G5S5) and is not considered a sensitive natural community. This stand of disturbed coyote brush lacks the structure and composition to qualify as coastal sage scrub ESHA under Policy CE 5. Outside the project site Coyote Brush Scrub in the San Jose Creek top of bank is part of the SPA. In the southern study area outside the City of Goleta, this community is not mapped as or considered ESHA (Santa Barbara County 2017).

MALOSMA LAURINA SHRUBLAND (LAUREL SUMAC SCRUB) ALLIANCE

Laurel Sumac Scrub (*Malosma laurina* Shrubland Alliance) often occurs on steep slopes and soils that are shallow and fine-textured. The canopy is open or continuous, with laurel sumac dominant or co-dominant in the shrub canopy. The herbaceous layer is sparse or grassy. The elevation range is approximately 15-1,300 feet. Emergent trees or tall shrubs may be present at low cover, including *Juglans californica, Platanus racemosa, Quercus agrifolia* or blue elderberry. *Malosma laurina* is a large, large-leaved sclerophyllous shrub that grows to approximately 15 feet tall. Shrubs produce low, but consistent crops of fleshy drupes. Birds and small mammals dispersed the seeds. The stones accumulate in duff and soil as a seed bank. Seedlings establish in full sun or shade but survive better in the shade of established shrubs. Seedlings and leaves are sensitive to frost.

This community exists on the project site within the development area as a large colonizing shrub adjacent to the movie screen (0.18 acres) with invasive iceplant (*Carpobrotus edulis,* CaI-IPC [California invasive Plant Council] Cal-IPC] high) dominant in the herb layer. Laurel Sumac Scrub is provided with a CDFW rank of G4S4 and is not considered sensitive (CDFW 2023b). This community is mapped as ESHA on General Plan CE Figure 4-1.

ATRIPLEX LENTIFORMIS (QUAILBUSH SCRUB) ALLIANCE

Quailbush Scrub Alliance is typically found on southeast and southwest facing slopes between 0 and 600 feet above mean sea level (MCV2). The alliance especially occurs in disturbed areas, including roadsides and fluvial areas with alkaline soils. *Atriplex lentiformis* is dominant in the shrub canopy, along with *Artemisia californica, Atriplex canescens, Baccharis pilularis, Baccharis salicifolia* ssp. *salicifolia, Encelia californica, Kochia americana, Malosma laurina, Pluchea sericea, Rhus integrifolia, Sporobolus airoides, Suaeda taxifolia,* and *Tamarix* spp. Emergent trees may be present at low cover, including *Myoporum laetum* or *Prosopis glandulosa*. Quailbush Scrub is provided with a CDFW rank of G4S4 and is not considered sensitive.

Quailbush Scrub is absent on the project site but occurs in the southern portion of the study area on the banks of San Jose Creek and on the Southern California Gas Company property. This community is considered part of the SPA in the San Jose Creek top of bank. This community is periodically disturbed since it overlaps with SBCFCD dredging operations and is not considered coastal sage scrub ESHA under Policy CE 5. On the Southern California Gas Company parcel this community is not mapped as ESHA and may have been seeded (Santa Barbara County 2017, Tierney Consulting 2018).

COASTAL SAGE SCRUB AND DUNE SEDGE (RESTORED)

This community is not present on the project site and is located on the paving facility 160 feet to the northwest of the project site. This community was required to be planted on the Security Paving property as habitat restoration west of the project site (City of Goleta 2011). This is part of a small City-mapped ESHA that included a non-native myoporum hedge, which was removed during the construction of the Security Paving project and was replanted with native coffeeberry (*Rhamnus californica*), toyon (*Heteromeles arbutifolia)*, and California sunflower (*Encelia california*) as part of the habitat restoration effort. This area is considered ESHA since the City of Goleta and CCC required restoration and is mapped as ESHA under CE Figure 4-1 (City of Goleta 2011 and 2018).

Non-native/Disturbed Land Cover

Four non-native communities within the disturbed land cover types are grouped into the non-native/disturbed category and are not considered ESHA. These non-native vegetation communities

are not provided with a CDFW ranking due to the dominance of non-native species and are not considered ESHA. Ruderal and developed are not identified in MVC2.

ICEPLANT MATS

The non-native Iceplant Mats herbaceous semi-natural alliance is typically found along bluffs, disturbed land, and sand dunes of immediate coastline, between 0 to 328 feet in elevation. Highway iceplant (*Carpobrotus edulis*) contributes to at least 90 percent relative cover in the herbaceous layer (MCV2). Iceplant spread beyond landscaped areas and invade dunes, dune scrub, coastal bluff scrub, and coastal prairies. All ice plant species are highly aggressive and compete with native plants for moisture, nutrients, and space. Iceplant Mats create adverse conditions for the establishment of natives. Ice plant is widely used for soil stabilization and landscaping. Ice plant Mats are scattered in small patches adjacent to San Jose Creek on the project site within the development area (0.31-acres) and within the study area.

ORNAMENTAL TREES AND SHRUBS

On the project site, the Ornamental Trees and Shrubs community includes intentional landscape lining the access road and concession stand. This landscaping includes roses (*Rosa* sp.), yucca (*Yucca* sp.), Mexican sage (*Salvia leucantha*), and other common landscape material. A variety of planted palm species are located adjacent to the concessions stand. In study area, this community includes windrow ornamental trees along Old San Jose Creek. Ornamental trees and shrubs are mapped within 0.30 acres of the development area.

RUDERAL

Ruderal areas are dominated by non-native plant species and do not contain substantial areas of native or naturalized vegetation. These anthropogenic communities consist of artificial communities of non-native plants or agricultural crops established and maintained by human disturbance. Ruderal areas are typically dominated by introduced Mediterranean annual plant species and other non-native invasive plant species. Ruderal vegetation is typically found in areas altered by agriculture, construction, and other land-clearing activities, along roadsides, and in other areas experiencing repeated ground surface disturbance.

Naturally occurring vegetation is sparse and non-native vegetation (weedy or ruderal) dominates the central portion of the project site, especially where soils are hard packed, and sustains patches of common knotweed (*Polygonum arenastrum*) and hairy sandspurry (*Spergularia villosa*). These annuals form very low-growing mats along the gentle berms created within the drive-in for parking during screening. Other low-growing weeds found in this area are scarlet pimpernel (*Anagallis arvensis*), cheeseweed (*Malva parviflora*), pineapple weed (*Matricaria discoidea*), and broad-leaf filaree (*Erodium botrys*). Non-native grasses form an irregular band around the perimeter wall, ostensibly where foot, vehicle, and clearing disturbance is lowest. Ruderal grasses include smooth barley (*Hordeum glaucus*), ripgut grass (*Bromus diandrus*), soft brome (*Bromus hordeaceus*), wild oats (*Avena fatua*), and ryegrass (*Lolium multiflorum*). Fast-growing broad-leaf weeds, such as castor bean (*Ricinus communis*) and black mustard, are scattered with the ruderal grasses in the project site interior. The southwestern portion of the project site contains similar species, plus smilo grass (*Stipa miliacea* spp. *Miliacea*), a non-native perennial bunchgrass. The development area is mapped with 1.80-acres of ruderal. This vegetation community is predominately non-native species and is not considered sensitive by CDFW or the City of Goleta.

DEVELOPED

This land cover type is directly associated with the existing land uses and bare ground and compacted areas that includes the following elements:

- **Asphalt and Concreate Paving**: mapped as State Route 217, Kellogg Avenue, the on-site access driveway, and adjacent asphalted areas
- **Asphalt and Gravel Parking Area**: present in the project site and includes the former public market and drive-in movie area
- **Concrete Rubble Stockpile**: located at an off-site concrete and asphalt recycling plant to the northwest
- **Dirt Road**: SBCFCD 15-foot road in the 20-foot easement
- **Structures**: present in the project site and includes the concession stand, movie screen and projector building to be removed, and other drive-in structures.

The development area is mapped with 4.19 acres of developed areas.

Wildlife and Movement Corridors

In general, the project site is not expected to support a very diverse wildlife population since it is paved and lacks native vegetation. Species expected to occur on the project site with regularity include California ground squirrel (*Otospermophilus beecheyi*), Botta's pocket gopher (*Thomomys bottae*), killdeer (*Charadrius vociferous)*, black phoebe (*Sayornis nigricans*) (recorded nesting), cliff swallow (*Petrochelidon pyrrhonata*), northern rough-winged swallow (*Stelgidopteryx ruficollis*), northern mocking bird (*Mimus polyglottos)*, song sparrow (*Melospiza melodia*), house finch (*Haemorhous mexicanus*), and house sparrow (*Passer domesticus*). The birds may perch on trees surrounding the project site perimeter. For larger birds, the barrenness of the project site dramatically reduces the diversity and abundance of the native rodent prey base, although small rodents have been observed in the southern portion of the project site (Rachel Tierney Consulting 2018). The project site and the adjacent sensitive habitat are underneath the Santa Barbara Municipal Airport flyway and are about 1,000 feet from the end of the runways. All animal species present are likely adapted to loud and frequent noise (Tierney Consulting 2018).

Wildlife needs to access essential habitat for water, foraging, breeding, and cover. Wildlife corridors and habitat linkages provide avenues for dispersal or migration of animals that also contribute to population viability in several ways, including (1) ensuring continual exchange of genes between populations to aid in maintaining genetic diversity, (2) providing habitat for some species, (3) providing access to adjacent habitat areas representing additional territory for foraging and mating, (4) allowing for greater carrying capacity, and (5) providing routes for colonization of habitat lands following local population extinctions or habitat recovery from ecological catastrophes (City of Goleta 2020). Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. "Wildlife corridor" is a term commonly used to describe linkages between discrete areas of natural habitat that allow movement of wildlife for foraging, dispersal, and seasonal migration. The General Plan does not specifically define "wildlife corridors" or "habitat networks" but they are protected under the General Plan.

The project site is located at the southern extent of Old Town Goleta industrial zoning and development. At the regional/landscape level scale, the City of Goleta is not within any mapped landscape models, such as an Essential Connectivity Area or Natural Landscape block in the *California*

Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California (Spencer et al. 2010). The *City of Goleta Creek and Watershed Management Plan* (Appendix E Figure 3) maps the project site and Goleta Slough to the south as habitat patch[2], Old San Jose Creek and a wildlife corridor, and San Jose Creek channel as a wildlife corridor north of the study area and project site.

San Jose Creek Wildlife Corridor

In the study area reach of San Jose Creek, the lack of riparian vegetation diminishes habitat value and active management precludes most resident aquatic wildlife (Tierney Consulting 2018, SBCFCD 2010). Shorebirds known from the Goleta Slough, including great egret (*Ardea alba)*(potential nesting), great blue heron (*Ardea herodias*) (nesting), double-crested cormorant (*Phalacrocorax auratus)* (roosting), Caspian tern, (*Hydroprogne caspia)* brown pelican (*Pelecanus occidentalis*), snowy egret (*Egretta thula)*, and mallard (*Anas platyrhynchos)* may forage in and over the channelized San Jose Creek. Double-crested cormorants, great blue herons, and great egrets are known to nest or roost in tall eucalyptus trees near the mouth of the Goleta Slough 0.84 mile to the south of the project (GSMC 2015).However, double-crested cormorants, great blue herons, and great egrets with the potential to nest or roost in in the Goleta Slough are not expected to nest or roost the project site due to a lack of suitable tall tree habitat (Tierney Consulting 2018).

San Jose Creek connects areas north of US 101 to the Goleta Slough and is a poor wildlife linkage providing minimal non-aquatic wildlife habitat since completely channelized for flood protection and confined between concrete walls. San Jose Creek through the study area consists of an approximate 2,000-foot concrete-lined flood control channel with steep walls and six-foot-high chain-link fences bordering the channel (City of Goleta 2022). The bottom of San Jose Creek north of the access ramp is articulated concrete revetment mat which includes fish passage with slotted weirs. The status of fish passage through this revetment is currently undetermined (City of Goleta 2022).

In San Jose Creek and the SBCFCD road east of the project site, terrestrial fauna generally lack refuge, nesting habitat, and food sources. Reduction of vegetation results in lost shading and water cooling, loss of nutrient input, and a shortfall of basking and hiding places within a vegetated bank or down logs. However, the SBFCD easement adjacent to San Jose Creek outside of and directly east of the project site may provides movement corridor to Goleta Slough and Old San Jose Creek for avian species and potentially terrestrial species. The SBCFCD gates in the easement adjacent to the project site are generally permeable to wildlife. However, a chain link fence with razor wire is present in the easement approximately 450 feet south of the development area at the terminus of Old San Jose Creek.

Old San Jose Creek Wildlife Corridor

Additional common species of birds expected to frequent the Old San Jose Creek in the study area include Anna's hummingbird, bushtit (*Psaltriparus minimus*), common yellowthroat (*Geothlypis trichas*), California towhee (*Melozone crissalis*), and goldfinches (*Spinus* sp.). The Old San Jose Creek channel serves as a movement corridor and refuge for amphibians, such as the Pacific chorus frog (*Pseudacris regilla*); reptiles, such as the western fence lizard (*Sceloporus occidentalis*); mammals, such as raccoon (*Procyon lotor*), opossum (*Didelphis virginiana*), striped skunk (*Mephitis mephitis*), woodrat (*Neotoma* sp.), rabbit (*Sylvilagus* sp.), shrew (*Sorex* spp.) and feral domestic cat, who all use the woodland habitats found along this drainage channel for protective cover to den and for moving between isolated pockets of open space found adjacent to the project site. Terrestrial wildlife and avian species may use the Old San Jose Creek drainage in the study area for foraging and nesting.

[2] A defined area used by species for breeding, socializing, or obtaining resources such as food, water, or shelter.

Regional wildlife movement is restricted by State Route 217 east and north of the study area and where Pine Avenue bisects the Old San Jose Creek corridor. Because Old San Jose Creek supports only ephemeral flow, it does not provide essential hydrologic resources for aquatic species in the area (Rachel Tierney Consulting 2018).

The vegetation communities present along Old San Jose Creek provide suitable food, shading, and nesting sources for both common and special-status species (City of Goleta 2020). The ability of Old San Jose Creek to provide a dispersal corridor for terrestrial wildlife and avifauna in this area is limited by numerous road crossings, chain-link fences, and other man-made structures that restrict wildlife use, fragment habitat, and impede movement, including several road crossings at Kellogg Way, Pine Avenue, Placencia Street in the study area, and an unnamed earthen access road that bisects Old San Jose Creek opposite the project site on land owned by the City of Santa Barbara (City of Goleta 2011). While wildlife may pass through the study area, the fenced project site is generally a barrier to terrestrial movement and not a wildlife corridor or a habitat patch. Old San Jose Creek riparian habitat may also function as an important forging and a resting stop for bird species during migration through the Pacific Flyway. The riparian canopy of Old San Jose Creek in the study area is constrained to a 50-foot width in the study area approximately 170 feet west of the development area.

Waters and Wetlands

A jurisdictional waters and wetland delineation was conducted as part of the 2023 Wetland Delineation Report, which updates the original delineation prepared in 2018. Mapped wetlands within the development area are depicted in Figure 4.3-4, *Detention Basin Outfall Wetland Delineation*, and the soil sampling points shown in Figure 4.3-1 and Figure 4.3-2 (Watershed Environmental 2023b). The delineation included vegetation, soil, and hydrology data from nine sample locations in the project site and study area consistent with the recent USACE, RWQCB, CDFW, and CCC guidance. Three were paired at the project site's eastern boundary, and three were located along the northern boundary. The delineation maps wetlands within 100 feet of development area under the jurisdiction of CDFW (streambeds) USACE waters of the United States (wetland and non-wetland), RWQCB waters of the State (wetland and non-wetland), Coastal Act one parameter wetlands, and City one parameter wetlands. The details of this delineation can be found in Appendix D-3.

In the study area, there are approximately 1.95 acres of state-designated, CDFW-managed Marine Protected Area (MPA), part of the Goleta Slough State Marine Conservation Area (SMCA), which extends from sea level to the mean high tide line of 4.51 feet elevation along the segment of San Jose Creek in and east of the project site. The location of the proposed drainage outfall is within the MPA as shown in Figure 4.3-3. The proposed outfall is also within the 7.1-foot high tide line regulated by the USACE and subject to daily tidal influences. With the exception of the proposed drainage outfall location, the project site and development area do not contain jurisdictional waters or wetlands.

USACE jurisdiction is limited to Waters of the United States and wetlands containing hydrophytic vegetation, hydric soils, and wetland hydrology (three parameters). CDFW, RWQCB, California Coastal Commission, and the City of Goleta have jurisdiction over all federally regulated waters and wetlands, as well as all single parameter wetlands (i.e., at least one wetland parameter such as hydrophytic vegetation, hydric soil, or wetland hydrology).

According to the County's 2021 *Environmental Thresholds and Guidelines Manual* (refer to Section 4.0, *Environmental Impact Analysis*), wetlands must have one or more of the following attributes:

- At least periodically, the land supports predominantly hydrophytes, that is plants adapted to moist areas,
- The substrate is predominantly un-drained hydric soil, and
- The substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year.

The *Environmental Thresholds and Guidelines Manual* also includes examples of naturally occurring wetlands as coastal salt and brackish marshes, freshwater marshes, or vernal pools.

As stated in the Wetland Delineation Report (Appendix D-3) and depicted in Figure 4.3-2, San Jose Creek is mapped with two riverine classifications in the study area: tidal and intermittent. In San Jose Creek, the location of the proposed drainage outfall contains aquatic resources under the USACE, Regional Water Quality Control Board (RWQCB), CDFW, CCC, and City jurisdictions as shown in Table 4.3-2.

Table 4.3-2 USACE, RWQCB, CCC, and CDFW Jurisdiction

Type	U.S. Army Corps of Engineers (USACE)	Regional Water Quality Control Board (RWQCB)	California Coastal Commission (CCC)/City	California Department of Fish and Wildlife (CDFW)
Study Area				
Waters (acres/linear feet) (at or below San Jose Creek high tide line, and Old San Jose Creek ordinary high water mark)	2.87/2,051	2.87/2,051	2.87/2,051	2.87/2,051
Wetland (acres) (Pickleweed Mats and Arroyo Willow Thicket alliances and associations)	0.835	6.55	6.55	6.55
Proposed Drainage Outfall Location				
Waters (acres/linear feet) (San Jose Creek high tide line)	0.01/20	0.01/20	0.01/20	0.01/20

Source: Watershed Environmental 2023b

Figure 4.3-2 National Wetlands Inventory Mapping and Wetland Sample Points

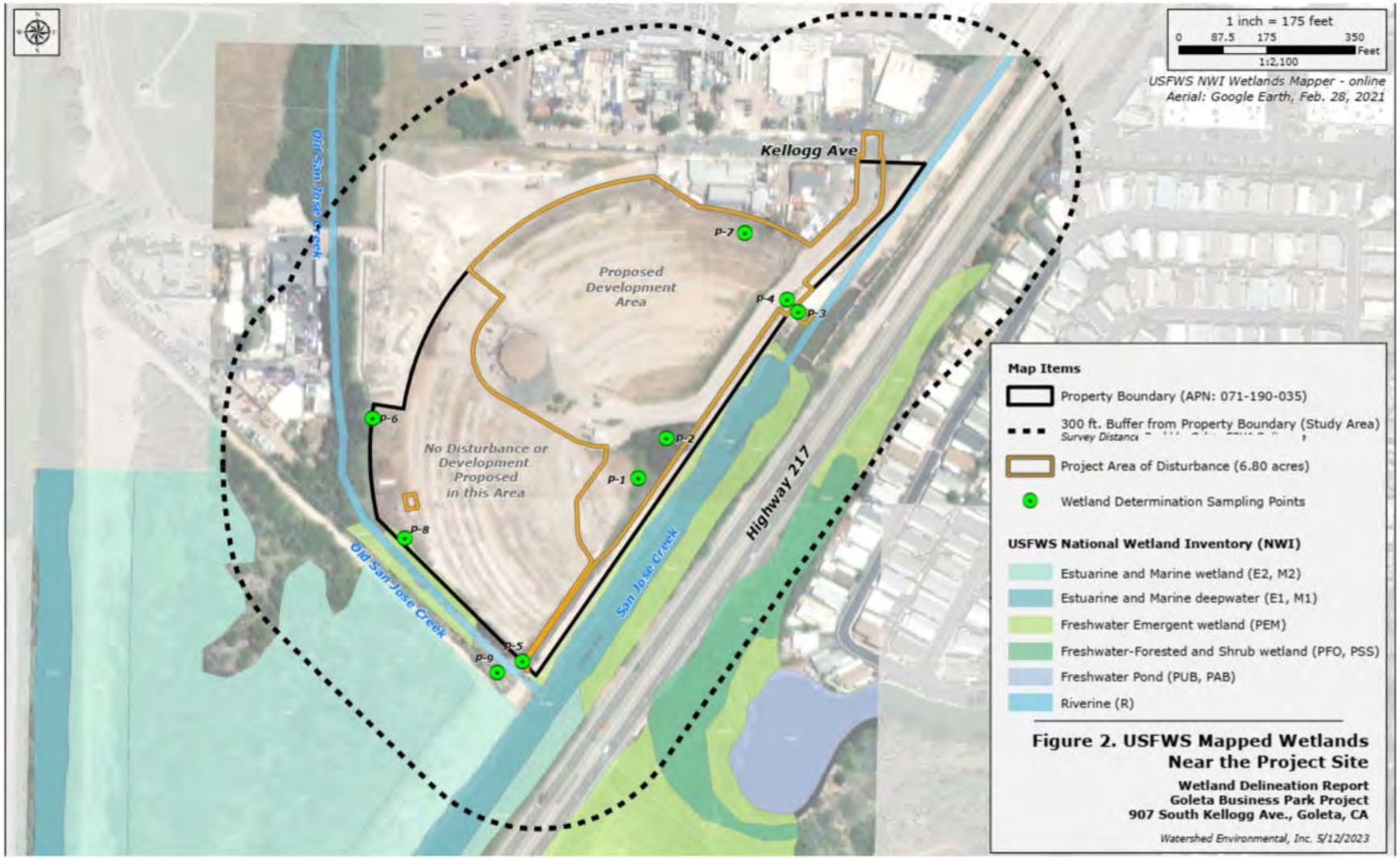


Figure 4.3-3 City Mapped Environmentally Sensitive Habitat and Stream Protection Area Buffers

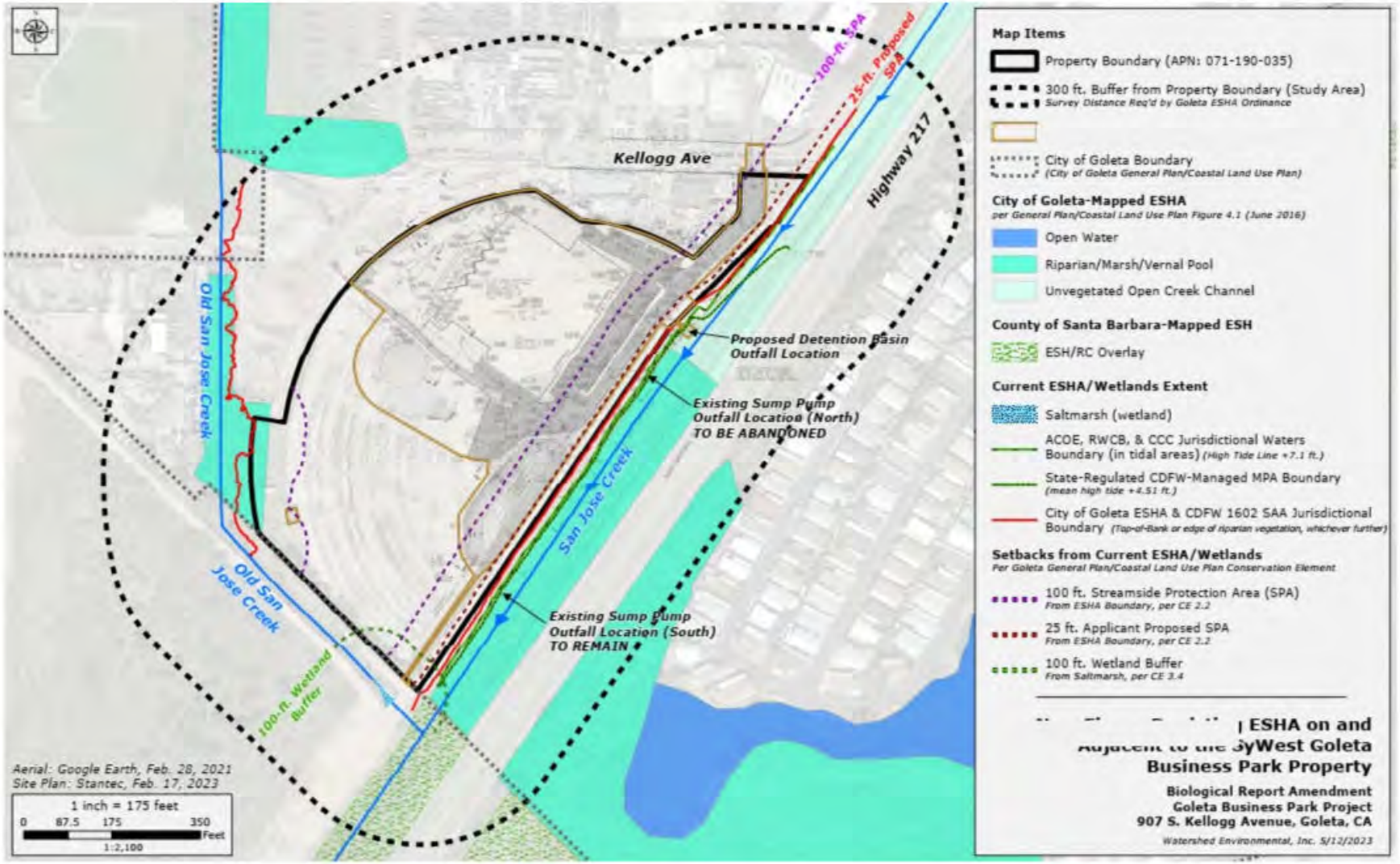
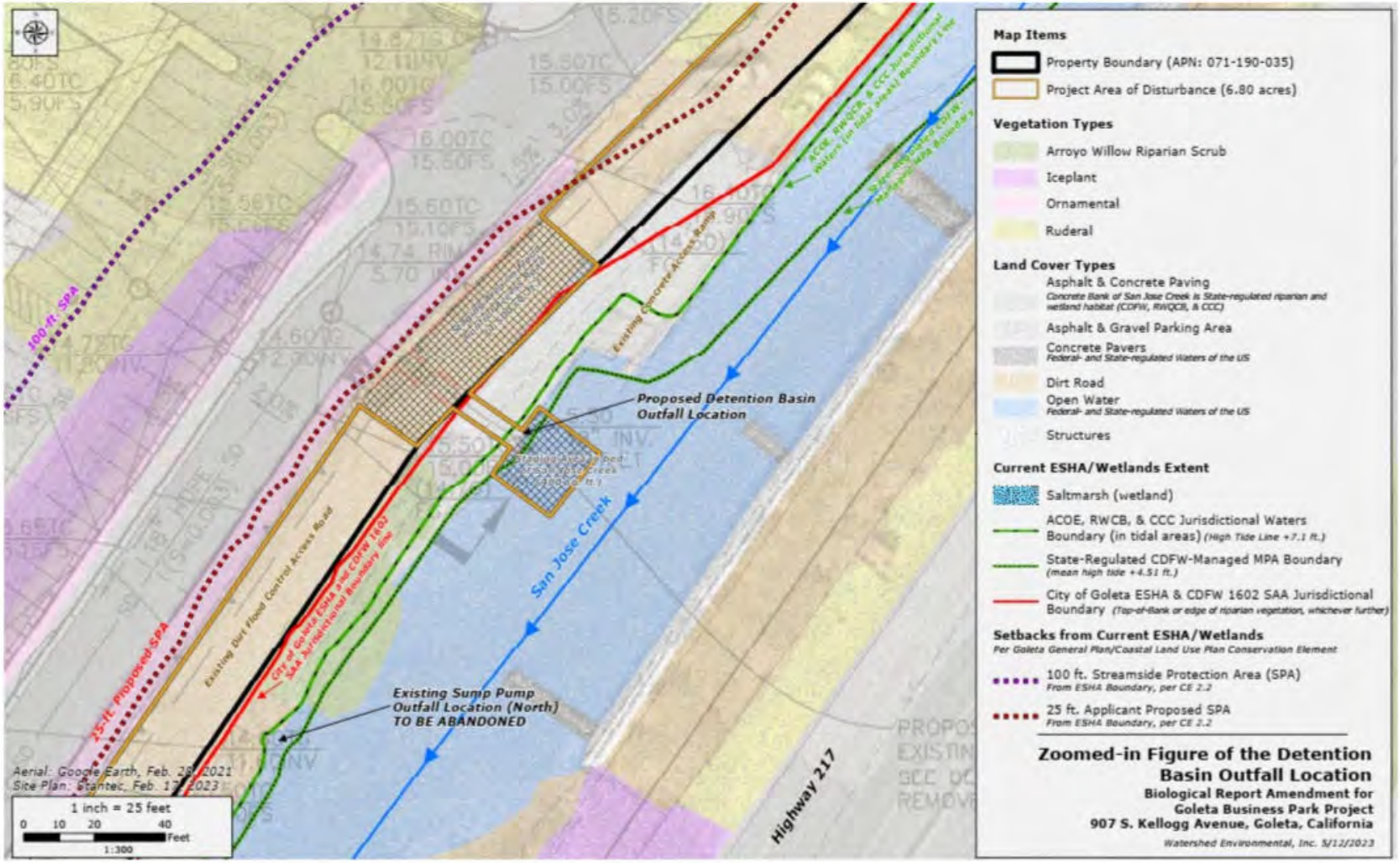


Figure 4.3-4 Detention Basin Outfall Wetland Delineation



c. Special-Status Species

Special-Status Plants

Special-status plant species are those plants listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS under the federal Endangered Species Act (ESA) (7 U.S.C. § 136, 16 U.S.C. § 1531 *et seq*.); those listed or proposed for listing, or candidates for listing as rare, threatened, or endangered by the CDFW under the California Endangered Species Act (CESA); and/or species on the *Special Vascular Plants, Bryophytes, and Lichens List* (CDFW 2023c). The latter document includes the *California Native Plant Society Inventory of Rare and Endangered Vascular Plants of California, Seventh Edition* (California Native Plant Society [CNPS] 2023) as updated online. Those plants contained on the CNPS Rare Plant Rank (CRPR) Lists 1 and 2 are considered special-status species. *CEQA Guidelines* Section 15125(a) also directs that special emphasis should be placed on resources that are rare or unique to the region.

Based on the database and literature review, eight special-status plant species are known or have the potential to occur in a 5-mile vicinity of the study area. Of these, no special-status plant species have a high or moderate potential to occur in the study area based on a lack of potentially suitable habitat and recorded occurrences. Based on the long history of urban and soil disturbance at the project site and development area, the potential for occurrence of special-status plant species is very low or not expected. Furthermore, competition from invasive species on the project site further reduces the potential for special-status plant species. Special-status plant species were not observed in the study area during the spring 2018 surveys, 2022 summer survey, or winter 2023 surveys. No special-status plants were observed during a spring 2021 rare plant survey partially overlapping the Old San Jose Creek portion of the study area conducted for the Ekwill Fowler Road Extension project (Rincon 2021a). Special-status plant species are not expected to occur in the study area or the project site and are therefore not discussed further.

Special-Status Wildlife

Special-status wildlife species are animals listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS or National Marine Fisheries Service (NMFS) under the federal ESA; those listed or proposed for listing as rare, threatened, or endangered by the CDFW under the CESA; animals designated as Fully Protected, Species of Special Concern, Watch List, or other Special Animals, or Rare, by the CDFW; and species on the *Special Animals List* (CDFW 2023d). *CEQA Guidelines* Section 15125(a) also directs that special emphasis should be placed on rare or unique resources to the region.

Based on the database and literature review, 32 special-status wildlife species are known or have the potential to occur in the vicinity of the project site; known occurrences within five miles of the project site were considered in this analysis (CDFW 2023e). The species that can be reasonably anticipated to occur were determined based on the reported ranges of the species and the type, extent, and condition of study area habitat. The potential for each special-status species to occur in the study area was evaluated according to the following criteria:

- **Low Potential.** Few of the habitat components meeting the species requirements are present, and/or the majority of habitat in the study area is unsuitable or of very poor quality. The species is not likely to be found in the study area. Protocol surveys (if conducted) did not detect species.

According to the County's *Environmental Thresholds and Guidelines Manual*, the low[3] potential to occur determination is applied to species that are documented but likely to be only transient through the area during foraging or migratory movements.

- **Moderate Potential**. Some of the habitat components meeting the species requirements are present, and/or only some of the habitat on or adjacent to the study area is unsuitable. The species has a moderate probability of being found in the study area.
- **High Potential**. All of the habitat components meeting the species requirements are present and/or most of the habitat on or adjacent to the study area is highly suitable. The species has a high probability of being found in the study area.
- **Present.** Species is observed in the study area or has been recorded (e.g., CNDDB [California Natural Diversity Data Base], other reports) in the study area recently (within the last 5 years).

Special-status species with a potential to occur in the study area and on the project site are listed in Table 4.3-3 and are discussed further below.

No special-status wildlife species were observed on the project site or study area during project specific 2018, 2022, or 2023 surveys. Only non-protected species with a moderate or high potential to occur, or species with a low potential to occur if afforded state and federal protection, are included under Section 4.3.3, *Impact Analysis*.

[3] The "low" definition: Suitable or marginal habitat may occur in the project site; however, no CNDDB records of the species have been recorded within 25 years; records of the species within 5 miles of the Project are suspected to be now extirpated or potentially misidentified with other species; or individuals were not observed during field surveys and are not anticipated to be present. For bird and bat species, this category may be used for species that are documented but likely to be only transient through the area during foraging or migratory movements and for which no suitable nesting or roosting habitat is present.

Table 4.3-3 Special-Status Wildlife Species with Potential to Occur in the Study Area

Species	Status (Federal/State)	Study Area Potential	Project Site Potential	Reasoning
Crotch bumble bee *Bombus crotchii*	None/ California Endangered Species Act (CESA) Candidate	Low (foraging and nesting)	Low (transient)	Coastal sage scrub habitat present in small (0.19 acres) disturbed and isolated patches in the development area. The project site is previously developed and significantly disturbed. Bumble bees were not observed during the field surveys. Seven individuals were observed since 2017 within four miles of the study area (CNDDB).
Monarch butterfly – California overwintering population *Danaus plexippus* pop. 1	Special Animal (SA)/federal ESA Candidate	Low (foraging and roosting)	Low (foraging) None (roost)	Roosting habitat is not present in the study area. Individuals may be present as transients.
Tidewater goby	Federally Endangered (FE)/Species of Special Concern (SSC)	Moderate	Moderate (proposed outfall location only)	Critical habitat designated and recent study area records in San Jose Creek aquatic habitat.
Southern California steelhead	Federally Threatened (FT)/CESA Candidate	Low	Low (proposed outfall location only)	Critical habitat designated. No CNDDB records within 3 miles. Present in the San Jose Creek watershed (NOAA 2023).
California red-legged frog *Rana draytonii*	FT/SSC	Very Low (transient)	Very Low (transient) (proposed outfall location only)	Very low potential due to a lack of suitable freshwater aquatic or upland habitat. Species not expected in the Goleta Slough or other tidal areas (USFWS 2019).
Western pond turtle *Emys marmorata*	Under review /SSC	Low (transient)	Low (transient) (proposed outfall location only)	Low potential only as upland or aquatic migrant due to a lack of suitable freshwater aquatic or upland habitat. Known from a SBCFCD mitigation site 0.85 mile east of the study area.
Coast horned lizard *Phrynosoma blainvillii*	None/SSC	Low	Low	Low potential native or ruderal vegetation on the project site and study area in Old San Jose Creek. No CNDDB records within five miles. Since this species has a low potential and is not afforded state or federal protection it is not discussed further.
California horned lark *Eremophila alpestris actia*	None/SA	Low (foraging)	Low (transient)	Low potential to forage in the study area. Since this species has a low potential and is not afforded state or federal protection it is not discussed further.

Species	Status (Federal/State)	Study Area Potential	Project Site Potential	Reasoning
Belding's savannah sparrow (BSS)	None/State Endangered (SE)	Low (nesting and foraging)	Low (transient)	Low potential to occur on the project site or in the development area. Potential to nest in Old San Jose Creek or San Jose Creek Pickleweed Mats within 250 feet of the project site.
Loggerhead shrike *Lanius ludovicianus*	None/SSC	Low (foraging)	Low (transient)	Low potential to forage in the study area the fall and winter. No CNDDB records within five miles and generally not known to reproduce on the South Coast (Lehman 2022). Since this species has a low potential and is not afforded state or federal protection it is not discussed further.
California least tern *Sternula antillarum browni*	FE/SE, Fully Protected (FP)	Low (foraging)	Low (proposed outfall location only)	Low potential to forage past the Goleta Slough over San Jose Creek channel. No study area nesting habitat.
Riparian Bird Species: yellow-breasted chat (*Icteria virens*) and the yellow warbler (*Setophaga petechi*)	None, SSC	High	Low (transient)	Detected in or adjacent to the Old San Jose Creek riparian corridor within the study area (Rincon 2021b). Low potential to forage and no potential to nest on the project site and in the development area.
Riparian Bird Species: Least Bell's vireo (Vireo bellii pusillus) and southwestern willow flycatcher (*Empidonax traillii extimus*)	FE/SE	None	None	Not documented within 10 miles and are only known in northern Santa Barbara County from the Santa Ynez and Santa Maria rivers (CDFW 2023e, Lehman 2022). These species generally nest and forage in dense riparian woodlands. It is unlikely that these species would be present in the southern Santa Barbara area due to lack of extant records and poor-quality habitat (CDFW 2023e, Lehman 2022). These species were not detected during 2021 protocol surveys that partially overlapped the study area in Old San Jose Creek (Rincon 2021b). Not expected to occur in the study area or project site and are not discussed further.
Special-status raptors: white-tailed kite (*Elanus leucurus*), burrowing owl (*Athene cunicularia*), Cooper's hawk (*Accipiter cooperii*)	None/FP, SSC	Low	Low (transient)	Low potential to forage over the study area. No study area nesting habitat.
Special-status Bats: Pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), Western red bat (*Lasiurus blossevillii*), Western mastiff bat (*Eumops perotis californicus)*	None/SSC and SA	Moderate (roosting and foraging)	Low (foraging)	Occasionally aerially forage over the project site at night. Would not be expected to roost, hibernate, or reproduce in the project site since trees are not present and the existing buildings are sealed and maintained.

Special-Status Insects

CROTCH BUMBLE BEE

Crotch bumble bee is a State-candidate endangered species (CDFW 2023d). All bumble bees have three basic habitat requirements: suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the annual colony period (spring, summer, and fall), and suitable overwintering sites for the queens (CDFW 2019). This species inhabits grassland and scrub areas, requiring a hotter and drier habitat than many other bumble bee species. Like other bumblebees, Crotch bumblebees are social insects that live in annual colonies. Nests are often more commonly thought to be underground in abandoned rodent dens but may be above ground in tufts of grass, old bird nests, rock piles, or cavities in dead trees (Xerces 2023). This species visits a wide range of host plants and is therefore considered a dietary generalist. It is classified as a short-tongued species, and preferred food plants include *Asclepias, Chaenactis, Lupinus, Medicago, Phacelia*, and *Salvia.* Little is known about the hibernacula, or overwintering sites of the Crotch bumble bee. Generally, bumble bees overwinter (or hibernate) in soft, disturbed soil, or under leaf litter or other debris (CDFW 2019). Workers and the colony are active from April to August. Queen bees are active for three months from March until May. Bumblebee colonies die off naturally within a couple of months, except for the new queens who hibernate in the soil until they start the subsequent year's colonies (Bumble Bee Conservation Trust 2016).

CNDDB search results returned one historical (1959) occurrence that overlaps with the study area. Since 2017 CNDDB reflects with seven individuals observed on the UCSB main campus, restoration sites, and Ellwood Mesa between approximately 1 and 4 miles from the study area. Bumble bee species are also studied and tracked through the Cheadle Center for Biological Diversity and Ecological Restoration (CCBER) focusing on the North Campus Open Space but includes in recent observations on Ellwood Mesa and the UCSB Campus (CCBER 2020, CDFW 2023e). To date, only individual bees have been observed.

Approximately 62 percent of the development area (4.19 acres) is mapped as developed and lacks preferred host plants for short-tonged bees. The portions of the project site mapped as disturbed are compacted from decades of use as a public market and drive-in theater (Tierney Consulting 2018, Watershed Environmental 2023b). Small mammals that could potentially excavate colony habitat have been observed along the southern project site boundary outside the development area (Tierney Consulting 2018). However, the project site is disturbed and compacted and would not be anticipated to host bumble bee colonies or overwintering habitat. The compacted development area is unlikely to contain excavated colony habitat or the soft soil required for overwintering queens. The area mapped as ruderal, ornamental, or ice plant would only provide marginal foraging habitat since the species lack preferred stands of native preferred flowering host plants or soft soils. The native scrub covers three percent of the development area (0.18 acre of Laurel Sumac Scrub and 0.01 acre of Coyote Brush Scrub) and may provide marginal foraging habitat, nesting colony habitat if mammal burrows are present, and overwintering habitat for individual queens in leaf litter. However, this habitat is disturbed, isolated, limited in size, and the entire project site was previously developed with fill. As shown in aerial photos from 1928 and 1965 before the 1966 construction of the drive-in theater, the project site was subject to agriculture (Tierney Consulting 2018, Figure 3). The project site is subject to indirect disturbance from State Route 217, SBFCD dredging, the Santa Barbara Municipal Airport, and surrounding industrial operations. Bumble bee colonies and hibernating queens would be expected in more suitable soft soil adjacent to intact stands of preferred foraging

habitat, such as the restored coastal sage scrub habitat present in the 136-acre North Campus Open Space approximately 3 miles west of the project site.

Within the study area, Old San Jose Creek riparian corridor, located 170 feet west of the project site, may provide nesting and foraging habitat for bumble bees. However, bumble bees were not observed during field surveys (Tierney Consulting 2018, Watershed Environmental 2023a). No observations within the study area are recorded on citizen science databases such as inaturalist or Bumble Bee Watch. The Crotch bumble bee has a low potential to forage and nest in the study area and a low potential to occur as a transient in the project site. Colonies or overwintering queens are not expected on the project site or the development area.

MONARCH BUTTERFLY

The monarch butterfly is a federal candidate species. It does not have a State listing; however, it is recognized in California as a special resource and roosting habitat is regulated under the City's General Plan. It is found across North America wherever suitable feeding, breeding, and overwintering habitats exist. Western populations migrate to coastal California, from Mendocino into Baja, to overwinter. Overwintering roosts are located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), within 5 miles of the coast, with nectar and water sources nearby. Although the species is not threatened with extinction, its autumnal and winter aggregation sites, or roosts, are especially vulnerable to disturbance. Sites that provide the key elements essential for successful monarch butterfly aggregation areas and are locations where monarchs have been historically present are ESHAs. These elements include stands of eucalyptus or other suitable trees that offer shelter from strong winds and storms, provide a microclimate with adequate sunlight, are situated near a source of water or moisture, and that provide a source of nectar to nourish the butterflies.

The project site lacks stands of host plants but nectar plants such as black sage and willows are present in the study area (Xerces 2019). This species has a low potential to forage and roost in the study area willows. This species has no potential to roost and a low potential to forage over the project site. The closest roost is in suitable eucalyptus habitat 0.25 mile to the east adjacent to Atascadero Creek, 524 individuals observed in 2022 (Xerces Site 2765). A potentially inactive or autumnal roost (Xerces Site 3174) is located 0.33 miles north along Old San Jose Creek in a eucalyptus grove (CDFW 2023e). Eucalyptus or other host trees are not present in the study area. Roosting sites are not discussed further.

Aquatic Species

TIDEWATER GOBY

Tidewater goby is a federally listed endangered species by the USFWS and a CDFW Species of Special Concern. Tidewater goby habitat is characterized by fairly still, but not stagnant, brackish water. They can withstand a wide range of habitat conditions and have been documented in waters with salinity levels that range from 0 to 42 parts per thousand, temperatures ranging from 46 to 77 degrees (°F), and water depths from 10 to 79 inches (USFWS 2019). Tidewater goby final critical habitat is designated in the tidally influenced portion of San Jose Creek in the study area and the location of the proposed drainage outfall. The physical and biological features that are present in San Jose Creek in the study area include water depth [physical and biological feature 1], substrate [Physical and Biological Feature 1a], and seasonal sandbar mouth [physical and biological feature 1c] (USFWS 2019).

Surveys targeting tidewater goby conducted in lower portions of San Pedro and San Jose Creek for the Goleta Park Bridge Project in 2008 and 2016 failed to locate any tidewater gobies (City of Goleta 2022). The USFWS considers all lower stream reaches of Goleta Slough suitable and accessible to tidewater goby. San Jose Creek is subject to tidal influence south of the access ramp at the drainage outfall and provides suitable habitat for tidewater goby.

SOUTHERN CALIFORNIA STEELHEAD

Steelhead is listed as Federally Endangered by National Oceanic and Atmospheric Administration (NOAA) Fisheries and a candidate for state listing as endangered by CDFW. The reach of San Jose Creek in the study area and at the drainage outfall is designated critical habitat for steelhead and provides the estuarine and freshwater physical and biological features to allow for juvenile and adult mobility; cover, shelter, and holding areas; and adequate water quality [physical and biological feature3]) (NMFS 2019). The tidal portion of San Jose Creek potentially provides freshwater migration corridors during periods of high rainfall and increased downstream flow when adults are migrating upstream, and estuarine areas for juvenile transition between fresh and saltwater during periods when juveniles are out-migrating (Caltrans 2022, City of Goleta 2022).

The primary and emerging Goleta Slough population-specific habitat concerns identified in the 2023 five-year species review include:

- Impediments to fish passage from road crossings, flood control structures, dams and diversions that restrict steelhead access to high quality spawning and rearing habitat, including refugia habitat, for anadromous and resident steelhead.
- Groundwater extractions that depress the groundwater levels that affect surface flows, particularly base flows that are critical to support rearing juveniles.
- Loss of a substantial amount of the original estuarine habitat, degradation of water quality resulting from urban and agricultural runoff (including fine sediments and pesticides), artificial breaching of the sandbar, and reduction in the size and complexity of estuarine habitats resulting from the intrusion of roads and railroad crossings has further affected the ability of steelhead to utilize these systems for rearing, acclimation, and ingress and egress to and from the ocean,
- Drought and wildfire, followed by intense rainfall events generating elevated levels of sedimentation in core recovery watersheds.
- San Jose Creek periodic disruption of riverine and riparian habitats from flood control maintenance activities that include removal of riparian vegetation following or in anticipation of high winter flows in response to intense cyclonic storms (NOAA 2023a)

Steelhead have been historically reported from Atascadero, San Jose, and San Pedro Creeks, and trout were historically stocked in upper San Jose Creek. Modification of the stream channel in the lower watershed has affected the amount of available steelhead habitat and the processes that develop and maintain preferred habitat by eliminating floodplain connectivity, limiting instream habitat complexity, and reducing riparian vegetation. Flood-control practices in the vicinity of the action area have disrupted stream sinuosity and inhibited the creeks' ability to meander (NMFS 2019). Recent anecdotal reports of rainbow trout (presumably steelhead) indicate this species may occur in Maria Ygnacio Creek and Atascadero Creek, indicating steelhead enter the Goleta Slough during high-flow periods (City of Goleta 2022). The reach of San Jose Creek in the study area (including the location of the proposed drainage outfall) provides a potential migration corridor to upstream spawning habitat. Available fish habitat includes sparse patches of overhanging vegetation (i.e., Arroyo Willow Thickets and patches of overhanging riparian vegetation). The species is present in the watershed (NOAA

2023a). At the location of the proposed drainage outfall, steelhead may be present as a migrant when the water depth is sufficient, although the potential is low (City of Goleta 2022, Caltrans 2022, NMFS 2019, NOAA 2023a).

ESSENTIAL FISH HABITAT

The tidal portion of San Jose Creek contains Essential Fish Habitat (EFH) for coastal pelagic species and groundfish (NOAA 2023b). The aquatic habitat in the tidal portion of San Jose Creek has brackish water, estuarine habitat conditions, and a muddy substrate. The area is subject to regular tidal influences and supports still but not stagnant waters. The boundary of EFH in San Jose Creek is the mean higher high-water level, which is around the 7-foot elevation mark. Although past surveys in San Jose Creek and surrounding areas have not identified any of the fish species listed in the Pacific Coast Ground Fish Fisheries Management Plan, San Jose Creek does support suitable habitat for big skate (*Raja binoculata*) and leopard shark (*Triakis semifasciata*), both of which are included in the management plan (Caltrans 2020, City of Goleta 2022). The only coastal pelagic species that potentially occur in estuaries such as San Jose Creek are sardines, although they are more common in the near shore and offshore and are not anticipated to be present in the study area. Therefore, EFH is not discussed further.

SEMI AQUATIC SPECIES

Semi-aquatic species are not likely to breed or forage in the channelized section of San Jose Creek in the study area adjacent to the project site, because only a limited band of riparian habitat is present and it is adjacent to and subject to noise and vibration disturbances from State Route 217 and the Santa Barbara Municipal Airport. These species have a low potential to occur as migrants during favorable conditions.

CALIFORNIA RED-LEGGED FROG

The California red-legged frog (*Rana draytonii*, CRLF) is federally threatened under the federal ESA and is a CDFW Species of Special Concern. CRLF prefers aquatic habitats with little or no flow, presence of surface water to at least early June, surface water depths to at least 27.6 inches, and presence of sturdy underwater supports, such as cattails. CRLF movements are variable, and dispersing individuals can travel over land between breeding sites for up to 1.7 mi. (Bulger et al 2003).

In the study area, the segment of San Jose Creek that is adjacent (east) to the project site is tidally influenced, and portions are channelized with concrete bed and banks. Tidally influenced and concrete-channeled bed and banks do not provide suitable foraging or breeding habitat for CRLF. Upstream from the study area non-tidal portion of channelized San Jose Creek riparian vegetation is sparse (when present) in the concrete channel for 0.75 miles north until Hollister Avenue where riparian canopy and natural channel is present. The sparse vegetation and fish passage improvements may provide potential dispersal habitat for CRLF but lack the water depth and vegetative cover needed for breeding (City of Goleta 2022). The segment of Old San Jose Creek in the study area lacks any freshwater aquatic habitat that could be used for breeding, and the riparian habitat that does exist in Old San Jose Creek is isolated by development from any habitat that could support CRLF. There is no suitable foraging or breeding habitat for CRLF in the study area or project site. The development area is 61 percent developed, and unpaved areas and/or ruderal are disturbed does not provide upland habitat.

Movement of CRLF often occur along riparian corridors; however, drier upland sites are utilized during the rainy season. Additionally, the Revised Designation of Critical Habitat Final Rule for the CRLF states

physical and biological features must include an area with two (or more) suitable breeding locations, a permanent water source, and associated uplands surrounding these water bodies up to 300 feet from the water's edge (USFWS 2010). Further, these features must occur within 1.25 mile of one another and be connected by barrier-free dispersal habitat that is at least 300 feet in width (UFWS 2010). Urban dispersal barriers include heavily traveled roads that possess no bridges or culverts; moderate to high density urban or industrial developments. Agricultural lands such as row crops, orchards, vineyards, and pastures do not constitute barriers to dispersal. The project site and a 1.7 mile buffer north of the tidal Goleta Slough includes row crops and heavily traveled roads, albeit with culverts and bridges.

There are three CNDDB recorded occurrences of CRLF 3.73 miles north of the project site in the Santa Ynez Mountains in the San Jose Creek watershed. Additionally, a CRLF observation has been reported approximately 1.7 miles to the north in Los Carneros Creek north of US 101; however, the specific location and details are not mapped or recorded in CNDDB (City of Goleta 2021). The Los Carneros Creek observation is potentially within the 1.7 miles dispersal distance from the study area. The study area is separated from upstream occurrences by the residential and commercial development, U.S. 101, Old Town Goleta, and finally the managed San Jose Creek channel. However, variations in annual precipitation could affect migration patterns. Movement within San Jose Creek through the project site and between adjacent watersheds is unlikely but not impossible.

Suitable habitat exists in upper San Jose Creek and other streams in the 1.7-mile dispersal distance from the Los Carneros Creek observation and USFWS determined that the CRLF is absent from the Goleta Slough (USFWS 2019). Therefore, the CRLF has a very low potential to be present with only a dispersing migrant or transient during favorable conditions in San Jose Creek or Old San Jose Creek in the study area and at the proposed outfall location in the development area, but not within the compacted project site and upland development area.

WESTERN POND TURTLE

Western pond turtle*,* including both the northwestern (ssp. *marmorata)* and southwestern (ssp. *pallida*) subspecies, is a CDFW Species of Special Concern. Western pond turtles occur in a variety of man-made and natural aquatic habitats, including rivers, creeks, estuaries, lakes, ponds, marshes, and reservoirs. Pond turtles, during the day, bask on land or near the water on logs, branches, or boulders. Female pond turtles nest in adjacent upland areas within 328 feet of aquatic habitat, although nests as far away as 1640 feet have occasionally been reported (Thompson 2016). Both sexes will move into adjacent upland habitat to estivate (enter summer dormancy) when aquatic habitat dries up. The species can persist, at least over moderate periods of time, in highly modified habitats with high human traffic and/or little basking substrate (Thompson 2016).

There are four recorded occurrences of western pond turtle clustered within two miles east of the project site, with three less than 1.5 miles to the east in Atascadero Creek in a mitigation area managed by SBCFCD (CCC 2022). In the study area, San Jose Creek does not provide suitable aquatic or upland habitat for this species, because the creek and the banks are too steep or too close to the road to provide suitable basking habitat; the creek is subject to daily tide fluctuations and only contains water during periods of high rainfall (Watershed Environmental 2023s). However, the constructed fish weirs and limited in-stream vegetation could provide suitable basking habitat. This species was not observed during the surveys conducted in the study area and surrounding projects (City of Goleta 2020, City of Goleta 2022, Caltrans 2022, Rincon 2022) but was assumed to be present at the San Jose Creek Bridge beginning 1,000 feet south of the study area (Caltrans 2022). Western pond turtles have a low potential to occur as an aquatic or upland migrant in favorable conditions

within the study area and at the location of the proposed drainage outfall, but not the compacted project site and development area. Western pond turtles have no potential to reside permanently in Old San Jose Creek, because there is no aquatic habitat. Since the federal ESA status western pond turtle is under review by USFWS this species discussed under Section 4.3.3, *Impact Analysis*.

Sensitive Avian Species

Many sensitive bird species potentially use the project site for foraging (see Appendix D-1; Appendix D-2) but are not expected to nest on the project site due to a lack of vegetation and habitat. Belding's savannah sparrow (BSS) which is listed under CESA, is the only listed bird species that has been documented nesting in Goleta Slough within the past approximately 50 years (CCC 2022).

BELDING'S SAVANNAH SPARROW

BSS is a non-migratory sparrow subspecies; this songbird is state-listed endangered. The BSS inhabits coastal marshes, from Santa Barbara south through San Diego County. It is one of only two wetland-dependent avian species that reside year-round in the coastal salt marshes of Southern California. This species forages for seeds insects, snails, and spiders throughout the marsh, in the vegetation, and along intertidal mudflats. BSS nests in salt marsh vegetation *(Salicornia* genus) on and about the margins of tidal flats. There are several recorded occurrences of BSS 0.63-mile southwest of the study area in suitable pickleweed in Goleta Slough. At Goleta Slough, this species nests in pickleweed marsh and adjacent habitats, and forages on nearby beaches and in grass and forb-dominated habitat on or near the Santa Barbara Municipal Airport (Dudek 2012). In most instances, narrow habitat belts and edges near uplands and freshwater marsh are simply not occupied by BSS due to competition and predation. Unless the upper marsh belt is much greater than 32 feet across, it will either not be occupied or occurrences will be extremely spotty (Zembal & Hoffman 2010). This species was not observed during project, overlapping, or nearby adjacent surveys (Caltrans 2020; City of Goleta 2021, 2022; Rincon 2022).

The isolated pickleweed patch in Old San Jose Creek has a low potential to provide potential nesting and foraging areas for BSS based on the lack of direct tidal influence as well as the vegetation density. Patches of pickleweed were observed in San Jose Creek prior to February and March 2023 dredging; if recovery occurs, it may provide marginal nesting and foraging habitat. Given there is isolated pickleweed present in the study area, the BSS has a low potential to nest and forage in study area. The species has a low potential to occur as a transient, but is not expected to nest or forage on the project site.

CALIFORNIA LEAST TERN

California least tern is a small tern with a distinctive black-capped head and is both state-listed endangered and Federally Endangered as well as state Fully Protected. This species nests along the California coast and breeds in colonies on bare or sparsely vegetated areas (CDFW 2023e). They catch fish by diving, usually in fairly shallow water, often hovering briefly before diving. They also occasionally eat shrimp, tadpoles, flying insects, and ants (Cornell Lab of Ornithology 2023b). Marginal suitable nesting habitat outside the study area in the Goleta Slough, though the species has not been recorded. Least terns were believed to have formerly bred at present-day Goleta Beach County Park in the 1930s (Lehman 2022). California least tern has been observed nesting approximately 2.6 miles west of the study area along the Coal Oil Point Reserve from 2004 to 2006 (CDFW 2023e). California least terns are known to forage within the Goleta Slough, and to a lesser degree may forage over the San Jose Creek channel. During favorable conditions (e.g., if prey species are present and the channel

is full) the California least tern has a low potential to forage over San Jose Creek in the study area including the location of the proposed drainage outfall.

RIPARIAN SPECIES

The yellow-breasted chat and the yellow warbler (both CDFW Species of Special Concern) have been observed either in or adjacent study area in the Old San Jose Creek Arroyo Willow Thickets (Rincon 2021b). Rare migrants such as the Vaux's swift (*Chaetura vauxi*) and black swift (*Cypseloides niger*), may potentially be present but are not expected to breed on the South Coast (Rachel Tierney Consulting 2018). These species are not expected to nest in the project site and have a low potential to occur as project site transient.

RAPTORS

The City and surrounding area are inhabited by several species of migratory and resident raptors. Sensitive raptors species tracked within 5-mile vicinity include the white-tailed kite, burrowing owl, Cooper's hawk, may forage over the study area but generally not the project site.

Several other raptors that do not meet the aforementioned definition as "sensitive" (but are protected when nesting pursuant to the California Fish and Game Code (CFGC) (§ 3503.5) were observed or have the potential to forage at the project site, including the American kestrel (*Falco sparverius*), barn owl (*Tyto alba*), great horned owl (*Bubo virginianus*), red-shouldered hawk (*Buteo lineatus*), red-tailed hawk (*Buteo jamaicensis*), and turkey vulture (*Cathartes aura*). However, the industrial zoned project site has been paved since 1966, and the foraging habitat is poor.

Raptor nests were not observed during the biological surveys conducted in 2023, 2022, and 2017, and the City's General Plan does not have a record of a historical raptor nest at or adjacent to the project site, as shown in the General Plan CE Figure 4-1. Special-status and other sensitive raptors do not have potential to nest at the project site due to lack of suitable nesting habitat and the study area due to existing development, noise, and human activities, or because the Goleta area is outside the species current breeding range (e.g., burrowing owl). The project site also lacks habitat for communal roosts of turkey vultures or white-tailed kites. Raptors would only be expected to occur as transient flying over the project site.

NESTING BIRDS

The project site contains habitat that can support nesting birds, including raptors, protected under the CFGC (§ 3503) and the Migratory Bird Treaty Act. Woody shrubs, eucalyptus and willow woodlands, and ornamental trees are present in and adjacent to the project site that could provide suitable nesting habitat. A black phoebe was observed nesting adjacent to San Jose Creek (Audubon 2023, Rachel Tierney Consulting 2018). However, no active or previously occupied nests were observed in the vegetation during the 2021 surveys or previous surveys.

Special Status Bats

Pallid bat, western red bat, western mastiff bat (CDFW Species of Special Concern), Yuma myotis, and hoary bat (CDFW Special Animal) have been reported within 5 miles of the study area.

- The Pallid bat is known to day and night roost in mature trees (e.g., bole cavities of oaks, valley oak bark). Roosts typically occur high above ground but are sensitive to disturbance. Locally potential foraging habitat includes over open shrub-steppe grasslands, oak savannah grasslands, talus slopes, gravel roads, fruit orchards, and vineyards.

- Western mastiff bat occurs in open, semi-arid to arid habitats, including coniferous and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosting habitat includes cliff faces, buildings, and caves. Foraging habitat locally includes dry desert washes, flood plains, chaparral, oak woodland, grassland, and agricultural areas.
- Western red bat roosts in trees in forests and woodlands of varying elevations and forages in grasslands, shrublands, open woodlands and forests, and agriculture (typically found in riparian habitats and does not occur in deserts).
- Yuma myotis occurs in a variety of lowland and upland habitats, including desert scrub, riparian, and woodlands and forests. Distribution is closely tied to bodies of water. It roosts in a variety of areas, including caves, cliffs, mines, crevices in live trees, buildings, and other man-made structures.
- Hoary bat typically roosts in trees in deciduous and coniferous forests and woodlands but occasionally roosts in rocks crevices. It forages in open areas, typically along riparian corridors or over water. Its diet primarily consists of moths.

Bat species have a moderate potential to roost and forage in the study area in Old San Jose Creek riparian trees 170 feet west of the project site since surrounded by industrial uses, the Santa Barbara Municipal Airport, and State Route 217. Where buildings are present in the project site bats are expected not to roost since buildings are maintained and sealed. Bat species have a moderate potential to forage in the study area over San Jose Creek and Old San Jose Creek and low potential to forage over the project site.

4.3.2 Regulatory Setting

a. Federal Laws and Regulations

Federal Endangered Species Act of 1973

Under the ESA, authorization is required to "take" a listed species. Take is defined under ESA Section 3 as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Under federal regulation (50 Code of Federal Regulations Sections 17.3, 222.102); "harm" is further defined to include habitat modification or degradation where it would be expected to result in death or injury to listed wildlife species by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Critical habitat is a specific geographic area(s) that is essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. Section 7 of the ESA outlines procedures for federal interagency cooperation to conserve federally listed species and designated critical habitat. The USFWS and NMFS share responsibility and regulatory authority for implementing the ESA (7 United States Code § 136, 16 United States Code § 1531 et seq.).

Section 7(a)(2) of the ESA and its implementing regulations require federal agencies to consult with USFWS or NMFS to ensure they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species, or result in the destruction or adverse modification of critical habitat. For projects where federal action is not involved and take of a listed species may occur, the project proponent may seek to obtain an incidental take permit under Section 10(a) of the ESA. Section 10(a) allows USFWS and NMFS to permit the incidental take of listed species

if such take is accompanied by a Habitat Conservation Plan that includes components to minimize and mitigate impacts associated with the take.

Migratory Bird Treaty and Bald and Golden Eagle Protection Acts

The Migratory Bird Treaty Act authorizes the Secretary of the Interior to regulate the taking of migratory birds. The Act provides that it is unlawful, except as permitted by regulations, "to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, […] any migratory bird, or any part, nest, or egg of any such bird" (16 United States Code § 703[a]). In addition, the Bald and Golden Eagle Protection Act is the primary law protecting eagles, including individuals and their nests and eggs. The USFWS implements the Migratory Bird Treaty Act (16 United States Code § 703-711) and the Bald and Golden Eagle Protection Act (16 United States Code § 668). Under the Bald and Golden Eagle Protection Act's Eagle Permit Rule (50 Code of Federal Regulations 22.26), USFWS may issue permits to authorize limited, non-purposeful take of bald eagles and golden eagles.

Clean Water Act of 1977, Section 404 and 401

Congress enacted the Clean Water Act "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Under Section 404 of the Clean Water Act, the United States Army Corp of Engineers (USACE) has authority to regulate activities that result in discharge of dredged or fill material into wetlands or other "waters of the United States." In achieving the goals of the Clean Water Act, the USACE seeks to avoid adverse impacts and to offset unavoidable adverse impacts on existing aquatic resources. Any discharge of dredged or fill material into jurisdictional wetlands or other jurisdictional waters of the United States requires a Section 404 permit from the USACE prior to the start of work.

Section 502 of the Clean Water Act further defines "navigable waters" as "waters of the United States, including the territorial seas." "Waters of the United States" are broadly defined at 33 CFR Part 328.3 to include navigable waters, perennial and intermittent streams, lakes, rivers, ponds, as well as wetlands, marshes, and wet meadows. The U.S. Supreme Court issued its decision in Sackett v. EPA on May 25, 2023, holding that the jurisdiction of the Clean Water Act extends only over wetlands that have a "continuous surface connection" with a traditional navigable water body of the United States. Also, in accordance with CWA Section 401, applicants for a Section 404 permit must obtain water quality certification from the appropriate RWQCB. Under the Clean Water Act, the USACE and RWQCB typically have jurisdiction over non-wetland waters with positive indicators of an ordinary high water mark and wetland waters that exhibit three parameters: suitable wetland hydrology, hydric soils, and hydrophytic vegetation.

The USACE has regulatory jurisdiction over Waters of the U.S. that are tidally influenced to the "high tide line" (33 CFR 323.3(c)). The USACE defines the high tide line as: *"the line of intersection of the land with the water's surface at the maximum height reached by a rising tide. The high tide line encompasses spring high tides and other high tides that occur with periodic frequency but does not include storm surges."*

b. State Laws and Regulations

California Coastal Act

The California Coastal Commission (CCC) derives its authority from the California Coastal Act. The Coastal Act places a high priority on the protection of biological and natural resources. Strict limits are placed on development in ESHA areas. The Coastal Act (§ 30107.5) defines Environmentally

Sensitive Habitat Area as: “Any area 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.” Very limited types of development are allowed in ESHA areas and then only where there is no feasible less environmentally damaging alternative. and feasible mitigation measures have been adopted. In general, only land uses that are dependent on the habitat resources are allowable within ESHA areas.

Section 30121 identifies wetlands, which often qualify as ESHA, as "lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens." Under the Coastal Commission’s definition of wetlands (California Code of Regulations [C.C.R] § 13577(b)), a wetland need only display one of the parameters typically used to define wetland areas, in contrast to the USACE, which uses a three-parameter definition under its federal authorities. The diking, filling, or dredging of wetlands is generally permitted for specific purposes listed in Coastal Act Section 30233, regardless of whether the wetland also meets the definition of ESHA.

- Section 30231: The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges- and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.
- Section 30233: Diking, filling, or dredging; continued movement of sediment and nutrients
  (a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

  […]

  (4) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

  […]

  (b) Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. […]

  (c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary. Any alteration of coastal wetlands identified by the Department of Fish and Game […]

  (d) Erosion control and flood control facilities constructed on watercourses can impede the movement of sediment and nutrients that would otherwise be carried by storm runoff into coastal waters. […]

- Section 30240 Environmentally sensitive habitat areas; adjacent developments

  (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those area

Porter-Cologne Water Quality Control Act

The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) have jurisdiction over "waters of the State," which are defined as any surface water or groundwater, including saline waters, within the boundaries of the state pursuant to the Porter-Cologne Act (California Water Code § 13050(e)). The SWRCB has issued general Waste Discharge Requirements regarding discharges to "isolated" waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the USACE to be Outside of Federal Jurisdiction). In the City of Goleta, the Central Coast RWQCB implements this general order for isolated waters not subject to federal jurisdiction and is also responsible for the issuance of water quality certifications pursuant to Clean Water Act Section 401 for waters subject to federal jurisdiction, as described above.

California Endangered Species Act (CESA) of 1984

The CESA (CFGC § 2050 et seq.) prohibits the take of state-listed threatened and endangered species without a CDFW incidental take permit. "Take" under the CESA is defined as to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" and is therefore restricted to direct harm of a listed species. Take under the CESA does not prohibit indirect harm by way of habitat modification (CFGC § 86).

CFGC § 2081(b) and (c) allow CDFW to issue an incidental take permit for a State listed threatened and endangered species only if specific criteria are met. These criteria can be found in 14 C.C.R. § 783.4(a) and (b). No Section 2081(b) permit may authorize the taking of "fully protected" species and "specified birds." If a project is planned in an area where a fully protected species or specified bird occurs, an applicant must design the project to avoid all takings; the CDFW cannot authorize takings under these circumstances. Requirements for the protection of fully protected species are described in CFGC (§§ 3511, 4700, 5050 and 5515). These statutes prohibit the take or possession of fully protected species. Incidental take of fully protected species may be authorized under an approved Natural Community Conservation Plan.

Native Plant Protection Act

The CDFW has authority to administer the Native Plant Protection Act (NPPA; CFGC § 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under NPPA § 1913(c), the owner of land where a rare or endangered native plant is growing is required to notify the CDFW at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

Marine Life Protection Act

The Marine Life Protection Act (MPA) of 1999 (CFGC § 2850 – 2863) (MLPA) (directs the state to redesign California's system of MPA to function as a network in order to: increase coherence and effectiveness in protecting the state's marine life and habitats, marine ecosystems, and marine natural heritage, as well as to improve recreational, educational and study opportunities provided by marine ecosystems subject to minimal human disturbance. The MLPA allows CDFW to re-examine

MPAs and the MPA Network to determine how effectively they are meeting MLPA goals every 10 years.

Work within the mean high tide (4.51 feet) is within an MPA, specifically the SMCA. An MPA classification that generally prohibits the take of living, geologic, and cultural marine resources, but allows potentially affected and ongoing permitted activities such as dredging and maintenance to continue. An SMCA is a type of MPA that protects resources by prohibiting commercial and recreational take while allowing take incidental to the permitted operation and maintenance of artificial structures inside the SMCA.

California Fish and Game Code

- **Sections 3503, 3503.5 and 3511.** Describe unlawful take, possession, or destruction of birds, nests, and eggs. CFGC Section 3503.5 protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs.
- **Section 1600 et seq.** Prohibits the substantial diversion or obstruction of the natural flow of, or substantial change to or use of any material from the bed, channel, or bank of any river, stream, or lake; or deposit or disposal of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake without prior notification to CDFW. In order for these activities to occur lawfully, the CDFW must receive written notification regarding the activity in the prescribed manner and may require a lake or streambed alteration agreement. Lakes, ponds, perennial and intermittent streams and associated riparian vegetation, when present, are subject to this regulation.
- **Section 1580.** The CFGC provides specific protection and listing for several types of biological resources, including designated Ecological Reserves. Designated Ecological Reserves are significant wildlife habitats to be preserved in natural condition for the general public to observe and study.

CEQA and CEQA Guidelines

The CEQA Guidelines provide a framework for the analysis of impacts to biological resources. The administering agency is the CEQA Lead Agency, which is in this case the City of Goleta. The County's adopted *Environmental Thresholds and Guidelines Manual* (2021) provides environmental thresholds specific to biological resources.

c. Local Regulations

City of Goleta General Plan/Coastal Land Use Plan Conservation Element

The Goleta General Plan includes policies that protect and preserve biological resources within the City by designating specific resources and areas as protected, including ESHAs, restricting activities and uses in protected areas, providing for the management of the resources on City lands, specifying impact avoidance and mitigation requirements for types of activities and by type of biological resource, and providing guidance for development and conservation decisions over the long-term. The policies anticipate the potential impacts to biological resources from the land uses and activities that will occur under the Goleta General Plan and serve to avoid, reduce, and/or mitigate those impacts.

Natural resources are regulated and protected through the City's General Plan/Coastal Land Use Plan (General Plan) Conservation Element (CE), which contains policies aimed at protecting ESHAs that are

generally mapped in Figure 4.1 of the General Plan (Figure 4.3-2). However, the Project application was deemed complete prior to April 2020, when the Title 17 Zoning Ordinance took effect. Therefore, the Project is being processed under the previous zoning code (Article II, Coastal Zoning Code). The General Plan provisions are applicable to the project, through the ESHA Goleta Overlay (§ 35-250B). Policies in the CE reinforce state and federal regulations that protect special-status habitats and species and apply additional local restrictions to identify, preserve, and protect the City's biological resources. Below is a summary of each ESHA type mapped in the study area (See Figure 4.3-3), and the text of the policies that regulate these resources.

Policy CE 1: Environmental Sensitive Habitats Area Designation and Policy.

The key protections and guidelines are stated in Policy CE 1, which for this project only include those applicable to ESHA and SPA buffers. Per Policy CE 1 development adjacent to ESHA is subject to the following standards:

- CE 1.6 Protection of ESHAs. [GP/CP] ESHAs shall be protected against significant disruption of habitat values, and only uses or development dependent on and compatible with maintaining such resources shall be allowed within ESHAs or their buffers. The following shall apply:
  a. No development, except as otherwise allowed by this element, shall be allowed within ESHAs and/or ESHA buffers.
  b. A setback or buffer separating all permitted development from an adjacent ESHA shall be required and shall have a minimum width as set forth in subsequent policies of this element. The purpose of such setbacks shall be to prevent any degradation of the ecological functions provided by the habitat area.

     […]
  d. The following uses and development may be allowed in ESHAs or ESHA buffers only where there are no feasible, less environmentally damaging alternatives and will be subject to requirements for mitigation measures to avoid or lessen impacts to the maximum extent feasible: 1) public road crossings, 2) utility lines, 3) resource restoration and enhancement projects, 4) nature education, 5) biological research, and 6) Public Works projects as identified in the Capital Improvement Plan, only where there are no feasible, less environmentally damaging alternatives.

     […]

- CE 1.9 Standards Applicable to Development Projects. [GP/CP] The following standards shall apply to consideration of developments within or adjacent to ESHAs:
  a. Site designs shall preserve wildlife corridors or habitat networks. Corridors shall be of sufficient width to protect habitat and dispersal zones for small mammals, amphibians, reptiles, and birds.
  b. Land divisions […]
  c. Site plans and landscaping shall be designed to protect ESHAs. Landscaping, screening, or vegetated buffers shall retain, salvage, and/or reestablish vegetation that supports wildlife habitat whenever feasible. Development within or adjacent to wildlife habitat networks shall incorporate design techniques that protect, support, and enhance wildlife habitat values. Planting of nonnative, invasive species shall not be allowed in ESHAs and buffer areas adjacent to ESHAs.

d. All new development shall be sited and designed so as to minimize grading, alteration of natural landforms and physical features, and vegetation clearance in order to reduce or avoid soil erosion, creek siltation, increased runoff, and reduced infiltration of stormwater and to prevent net increases in baseline flows for any receiving water body.

e. Light and glare from new development shall be controlled and directed away from wildlife habitats. Exterior night lighting shall be minimized, restricted to low intensity fixtures, shielded, and directed away from ESHAs.

f. All new development should minimize potentially significant noise impacts on special-status species in adjacent ESHAs.

g. All new development shall be sited and designed to minimize the need for fuel modification, or weed abatement, [...]

Policy CE 2 Stream Protection Area

As shown in Figure 4.3-1 and Figure 4.3-3 the riparian habitat associated with San Jose Creek adjacent the northeast property line and Old San Jose Creek west of the project is mapped as a SPA ESHA, thereby warranting a 100-foot buffer under Policy CE 2.2. Policy CE 2.2, designated Streamside Protection Areas (SPA), requires a 100-foot buffer from the San Jose Creek and Old San Jose Creek top of bank. The following SPA policies apply:

- Policy CE 2: Protection of Creeks and Riparian Areas [GP/CP] Objective: Enhance, maintain, and restore the biological integrity of creek courses and their associated wetlands and riparian habitats as important natural features of Goleta's landscape.
- CE 2.1 Designation of Protected Creeks. [GP/CP] The provisions of this policy shall apply to creeks shown in Figure 4-1. These watercourses and their associated riparian areas are defined as ESHAs. They serve as habitat for fish and wildlife, provide wildlife movement corridors, provide for the flow of stormwater runoff and floodwaters, and furnish open space and passive recreational areas for city residents.
- CE 2.2 Streamside Protection Areas. [GP/CP] A streamside protection area (SPA) is hereby established along both sides of the creeks identified in Figure 4-1. The purpose of the designation shall be to preserve the SPA in a natural state in order to protect the associated riparian habitats and ecosystems. The SPA shall include the creek channel, wetlands and/or riparian vegetation related to the creek hydrology, and an adjacent upland buffer area. The width of the SPA upland buffer shall be as follows:

  a. The SPA upland buffer shall be 100 feet outward on both sides of the creek, measured from the top of the bank or the outer limit of wetlands and/or riparian vegetation, whichever is greater. The City may consider increasing or decreasing the width of the SPA upland buffer on a case-by-case basis at the time of environmental review. The City may allow portions of a SPA upland buffer to be less than 100 feet wide, but not less than 25 feet wide, based on a site-specific assessment if (1) there is no feasible alternative siting for development that will avoid the SPA upland buffer; and (2) the project's impacts will not have significant adverse effects on streamside vegetation or the biotic quality of the stream. […]
- CE 2.3 Allowable Uses and Activities in Streamside Protection Areas. [GP/CP] The following compatible land uses and activities may be allowed in SPAs, subject to all other policies of this plan, including those requiring avoidance or mitigation of impacts:
  a. Agricultural operations […]
  b. Fencing and other access barriers along property boundaries and along SPA boundaries.

c. Maintenance of existing roads, driveways, utilities, structures, and drainage improvements.
d. Construction of public road crossings and utilities, provided that there is no feasible, less environmentally damaging alternative.
e. Construction and maintenance of foot trails, bicycle paths, and similar low-impact facilities for public access.
f. Resource restoration or enhancement projects.
g. Nature education and research activities.
h. Low-impact interpretive and public access signage.
i. Other such Public Works projects as identified in the Capital Improvement Plan, only where there are no feasible, less environmentally damaging alternatives.

- CE 2.5 Maintenance of Creeks as Natural Drainage Systems. [GP/CP] Creek banks, creek channels, and associated riparian areas shall be maintained or restored to their natural condition wherever such conditions or opportunities exist. Creeks carry a significant amount of Goleta's stormwater flows. The following standards shall apply:
  a. The capacity of natural drainage courses shall not be diminished by development or other activities.
  b. Drainage controls and improvements shall be accomplished with the minimum vegetation removal and disruption of the creek and riparian ecosystem that is necessary to accomplish the drainage objective.
  c. Measures to stabilize creek banks, improve flow capacity, and reduce flooding are allowed but shall not include installation of new concrete channels, culverts, or pipes except at street crossings, unless it is demonstrated that there is no feasible alternative for improving capacity.
  d. Drainage controls in new development shall be required to minimize erosion, sedimentation, and flood impacts to creeks. Onsite treatment of stormwater through retention basins, infiltration, vegetated swales, and other best management practices (BMPs) shall be required in order to protect water quality and the biological functions of creek ecosystems.
  e. Alteration of creeks for the purpose of road or driveway crossings shall be prohibited except where the alteration is not substantial and there is no other feasible alternative to provide access to new development on an existing legal parcel. Creek crossings shall be accomplished by bridging and shall be designed to allow the passage of fish and wildlife. Bridge abutments or piers shall be located outside creek beds and banks, unless an environmentally superior alternative exists.

- CE 2.6 Restoration of Degraded Creeks. [GP/CP] Segments of several creeks in Goleta have been covered or channelized by concrete culverts, causing degradation of the creek ecosystem. Restoration activities for improving degraded creek resources shall include the following:
  a. Channelized creek segments and culverts shall be evaluated and removed to restore natural channel bed and bank, where feasible.

     […]

  c. Barriers that prevent migration of fish such as anadromous salmonids from reaching their critical habitat shall be removed or modified.

d. Restoration of native riparian vegetation and removal of exotic plant species shall be implemented, unless such plants provide critical habitat for monarch butterflies, raptors, or other protected animals.

e. Creek rehabilitation projects shall be designed to maintain or improve flow capacity, trap sediments and other pollutants that decrease water quality, minimize channel erosion, prevent new sources of pollutants from entering the creek, and enhance in-creek and riparian habitat.

f. The use of closed-pipe drainage systems for fish-bearing creeks shall be prohibited unless there is no feasible, less environmentally damaging alternative. When the use of culverts is necessary, the culverts shall be oversized and have gravel bottoms that maintain the channel's width and grade.

Policy CE 3 Wetland ESHA

Policy CE 3 does not apply to the SPAs under Policy CE 2. The following wetland policies apply to proposed activities in this portion of the study area:

- Policy CE 3: Protection of Wetlands [GP/CP] Objective: To preserve, protect, and enhance the functions and values of Goleta's wetlands.
- CE 3.1 Definition of Wetlands. [GP/CP] Wetlands are defined as any area that meets the definition of a wetland as defined by the California Coastal Commission, California Department of Fish and Game, and U.S. Fish and Wildlife Service. The most protective of definitions shall be applied and used to determine the boundary of a wetland. The City of Goleta uses the identification of a single indicator (soil, hydrology, or plants) to determine the boundary of a wetland.
- CE 3.2 Designation of Wetland ESHAs. [GP/CP] Wetland ESHAs are included in Figure 4-1. In the Coastal Zone, wetlands are lands that may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens. Goleta's wetlands are associated with small lagoons at the mouths of Bell Canyon and Tecolote Creeks, vernal pools, and freshwater marshes and ponds or impoundments, such as Lake Los Carneros. All wetlands are defined as ESHAs. Any unmapped areas that meet the criteria identified in CE 3.1 are wetlands and shall be granted all of the protections for wetlands set forth in this plan.
- CE 3.3 Site-Specific Wetland Delineations. [GP/CP] In considering development proposals where an initial site inventory or reconnaissance indicates the presence or potential for wetland species or indicators, the City shall require the submittal of a detailed biological study of the site, with the addition of a delineation of all wetland areas on the project site. Wetland delineations shall be based on the definitions contained in § 13577(b) of Title 14 of the C.C.R. A preponderance of hydric soils or a preponderance of wetland indicator species will be considered presumptive evidence of wetland conditions. […]
- CE 3.4 Protection of Wetlands in the Coastal Zone. [CP] The biological productivity and the quality of wetlands shall be protected and, where feasible, restored in accordance with the federal and state regulations and policies that apply to wetlands within the Coastal Zone. Only uses permitted by the regulating agencies shall be allowed within wetlands. The filling, diking, or dredging of open coastal waters, wetlands, estuaries, and lakes is prohibited unless it can be demonstrated that:
  a. There is no feasible, environmentally less damaging alternative to wetland fill.
  b. The extent of the fill is the least amount necessary to allow development of the permitted use.

c. Mitigation measures have been provided to minimize adverse environmental effects.

d. The purposes of the fill are limited to: incidental public services, such as burying cables or pipes; restoration of wetlands; and nature study, education, or similar resource-dependent activities.

A wetland buffer of a sufficient size to ensure the biological integrity and preservation of the wetland shall be required. Generally, the required buffer shall be 100 feet, but in no case shall wetland buffers be less than 50 feet. The buffer size should take into consideration the type and size of the development, the sensitivity of the wetland resources to detrimental edge effects of the development to the resources, natural features such as topography, the functions and values of the wetland, and the need for upland transitional habitat. A 100-foot minimum buffer area shall not be reduced when it serves the functions and values of slowing and absorbing flood waters for flood and erosion control, sediment filtration, water purification, and ground water recharge. The buffer area shall serve as transitional habitat with native vegetation and shall provide physical barriers to human intrusion.

- CE 3.6 Mitigation of Wetland Fill. [GP/CP] Where any dike or fill development is permitted in wetlands in accordance with the Coastal Act and the policies of this plan, at a minimum mitigation measures shall include creation or substantial restoration of wetlands of a similar type. Adverse impacts shall be mitigated at a ratio of 3:1 unless the project proponent provides evidence that the creation or restoration of a lesser area of wetlands will fully mitigate the adverse impacts of the fill. However, in no event shall the mitigation ratio be less than 2:1. All mitigation measures are subject to the requirements of CE 1.7.

Policy CE 5 Protection of Other Terrestrial Habitat Areas

Policy 5 pertains to upland habitats. As discussed above under Section 4.3.1 the upland native habitats onsite are not considered coastal sage scrub ESHA since they are frequently legally disturbed and lack the structural composition of intact coastal sage or bluff scrub.

- Policy CE 5: Protection of Other Terrestrial Habitat Areas [GP/CP] Objective: To preserve, protect, and enhance unique, rare, or fragile native flora and plant communities.
- CE 5.1 Designation of Other Terrestrial ESHAs. [GP/CP] The following habitats, which are not specifically included in other policies, are hereby designated ESHAs:
  a. Native grasslands.
  b. Coastal bluff scrub, coastal sage-scrub, and chaparral.
- CE 5.3 Protection of Costal Bluff Scrub, Coastal Sage Scrub, and Chaparral ESHA. [GP/CP] In addition to the provisions of Policy CE 1, the following standards shall apply:

  […] Coastal sage scrub is defined as a drought-tolerant, Mediterranean habitat characterized by soft-leaved, shallow-rooted subshrubs such as California sagebrush (*Artemisia californica*), coyote bush (*Baccharis pilularis*), and California encelia (*Encelia californica*). It is found at lower elevations in both coastal and interior areas where moist maritime air penetrates inland. […] The area must have both the compositional and structural characteristics of coastal bluff scrub, coastal sage scrub, or chaparral habitat as described in Preliminary Descriptions of Terrestrial Natural Communities of California (Holland 1986) or other classification system recognized by the California Department of Fish and Game.

As discussed above under Section 4.3.1 the project site scrub communities do not qualify as ESHA under Policy CE 5.

Policy CE 6 Protection of Marine Habitat Areas

Under Policy 6.1 areas of San Jose Creek within the mean high tide are within a MPA as shown in Figure 4.3-3 are subject to Policy 6 and considered ESHA.

- Policy CE 6: Protection of Marine Habitat Areas [GP/CP] Objective: Preserve and protect the biological integrity of marine habitats and resources within and adjacent to Goleta.
- CE 6.1 Designation of Marine ESHAs. [GP/CP] All marine areas offshore from Goleta extending from the mean high tide line seaward to the outer limit of state waters are hereby designated ESHAs. These areas include Areas of Special Biological Significance and MPAs (as designated by the California Department of Fish and Game) and shall be granted the protections provided for ESHAs in this plan.

Policy CE 8: Protection of Special-Status Species

Policy CE 8.c protects steelhead and tidewater goby habitat as ESHA but is not discussed further since San Jose Creek is ESHA under Policy CE 2 and Policy 6 and would not be afforded grater protections under Policy 8.

The General Plan extends protection to raptor nesting and roosting sites, by designating nesting and roosting sites as ESHA. The City requires new development to be set back at least 100 feet from active and historical raptor nests under Policy CE 8.4.

General Plan Policy CE 8.2 requires that all development be located, designed, constructed, and managed to avoid disturbance or adverse impacts to sensitive (special-status) species and their habitats, including nesting, rearing, roosting, foraging, and other elements of required habitats.

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Several biological surveys conducted since 2017 documented existing site conditions and the potential presence of sensitive biological resources, including sensitive plant and wildlife species, sensitive plant communities, jurisdictional waters and wetlands, and habitat for nesting birds. Rincon biologists conducted an updated record search and reconnaissance survey on January 20, 2023, to verify site conditions. An inventory of native plant and animal species observed during the site visit was compiled, and an evaluation of potential jurisdictional features was performed. Where applicable, native vegetation communities were classified according to MCV2 and cross-referenced with Holland (1986). The SPAs were confirmed in 2023 based on the wetland delineation. Plants were identified to species, or subspecies, using *The Jepson Manual* (Baldwin et al. 2012). Pertinent technical literature for wildlife was reviewed to supplement regional and site-specific information on wildlife.

Table 4.3-4 Project Study Area Biological Surveys

Surveyors	Date	Type
Mark De La Garza, Watershed Environmental	2/15/2023 2/8/2023	Wetland delineation
Yuling Huo, Rincon	1/20/2023	Reconnaissance
Mark De La Garza and Dominick Burnham, Watershed Environmental	8/22/2022	Reconnaissance
Rachel Tierney, Rachel Tierney Consulting	5/11/2017 6/8/2017 6/19/2017	Reconnaissance, rare plant Wetland delineation, rare plant Reconnaissance, rare plant
Vince Simonsen, Rachel Tierney Consulting	5/20/2017	Reconnaissance, rare plant

Source: Watershed Environmental 2023a and 2023b, Rachel Tierney Consulting 2018

The reports include review literature for baseline information on biological resources potentially occurring at the project site, study area, and surrounding area. The literature review included site-specific and surrounding reports, information in peer-reviewed journals, and standard and location-specific reference materials (e.g., CNPS 2023, Lehman 2022, Xerces 2023b, Meade 2017). Rincon also conducted a review of the CDFW CNDDB (CDFW 2023e). Other sources of information about the study area included aerial photographs, topographic maps, geologic maps, climatic data, and project plans. The Rare Plants of Santa Barbara County list was also reviewed (Santa Barbara Botanical Garden 2018). Previous biological studies for projects overlapping the project site (Rincon 2021a and 2021b, City of Goleta 2008 and 2022) and in the immediate watershed (Rincon 2022, Caltrans 2020) were reviewed. Where applicable citizen science databases were also reviewed (Audubon 2023, Cornell Lab of Ornithology 2023a, iNaturalist 2023).

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on biological resources. Would the project:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
2. 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;
3. Have a substantial adverse effect on state or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

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

The County's 2021 *Environmental Thresholds and Guidelines Manual* calls for assessing short- and long-term impacts. Significant impacts to species or habitats is determined based on whether a project would:

- Substantially reduce or eliminate species diversity or abundance.
- Substantially reduce or eliminate quantity or quality of nesting areas.
- Substantially limit reproductive capacity through loss of individuals or habitat.
- Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food resources.
- Substantially limit or fragment range and movement (geographic distribution of animals and/or seed dispersal routes).

The *Environmental Thresholds and Guidelines Manual* include the following criteria specific to habitats in the study area:

- **Wetlands.** Projects which result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or would threaten the continuity of wetland-dependent animal or plant species are considered to have a potentially significant effect on the environment. Projects which substantially interrupt wildlife access, use and dispersal in wetland areas would typically be considered to have a potentially significant impact. Projects which disrupt the hydrology of wetlands systems would be considered to have a potentially significant impact.
- **Coastal Salt Marsh.** Project created impacts may be considered significant due to the potential to change species composition and habitat value through: substantial alteration of tidal circulation or decrease of tidal prism; adverse hydrologic changes; substantial increase of sedimentation, introduction of toxic elements or alteration of ambient water temperature; construction activity which creates indirect impacts such as noise and turbidity on sensitive animal species, especially during critical periods such as breeding and nesting; disruption of wildlife dispersal corridors; or disturbance or removal of substantial amounts of marsh habitats.
- **Riparian Habitats.** Project created impacts may be considered significant due to: direct removal of riparian vegetation; disruption of riparian wildlife habitat, particularly animal dispersal corridors and or understory vegetation; or intrusion within the upland edge of the riparian canopy leading to potential disruption of animal migration, breeding, etc. through increased noise, light and glare, and human or domestic animal intrusion; or construction activity which disrupts critical time periods for fish and other wildlife species.

The *Environmental Thresholds and Guidelines Manual* provides examples of areas in the City where impacts to habitat are presumed to be less than significant, including:

- Small acreages of non-native grassland if wildlife values are low.
- Individuals or stands of non-native trees if not used by important animal species such as raptors or monarch butterflies.
- Areas of historical disturbance such as intensive agriculture.
- Small pockets of habitats already significantly fragmented or isolated and disturbed or degraded.
- Areas of primarily ruderal species resulting from pre-existing man-made disturbance.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? County: Substantially reduce or eliminate species diversity or abundance. Substantially reduce or eliminate quantity or quality of nesting areas. Substantially limit reproductive capacity through loss of individuals or habitat. Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food resources.

Impact BIO-1 CONSTRUCTION AND OPERATION OF THE PROJECT WOULD NOT DIRECTLY IMPACT FORAGING SPECIAL-STATUS BIRDS OR RAPTORS. CONSTRUCTION COULD INDIRECTLY IMPACT THE NESTING STATE PROTECTED BELDING'S SAVANNAH SPARROW (BSS), IF PRESENT WITHIN THE NEARBY PICKLEWEED HABITAT IN SAN JOSE CREEK AND OLD SAN JOSE CREEK. CONSTRUCTION NOISE AND VEGETATION CLEARING HAVE THE POTENTIAL TO DIRECTLY AND INDIRECTLY IMPACT NESTING BIRDS PROTECTED UNDER THE MIGRATORY BIRD TREATY ACT, IF PRESENT. IMPACTS ON NESTING BIRDS, INCLUDING SENSITIVE SPECIES, ARE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

Foraging special-status birds, including the special-status BSS and loggerhead shrike, have a low potential to be present as transients on the project site. These species are mobile and would move away from construction or operational disturbance. Therefore, the proposed project would not directly impact foraging special-status birds or raptors.

Although no BSS have been observed in the study area during field surveys, the proposed project has the potential to indirectly impact BSS if nesting in pickleweed habitat in Old San Jose Creek or San Jose Creek. Construction noise and vegetation clearing have the potential to indirectly impact nests due to visual and acoustic project-related disturbance. Indirect construction impacts to nesting BSS in the study area (if present) are potentially significant and mitigation is required. As discussed under Section 4.11, *Noise*, operational noise would not exceed the existing ambient noise level. Project landscaping would provide visual screening from pickleweed habitat. Therefore, project operation would not indirectly impact BSS.

There are no historical records or observations of active raptor nests or communal roosts at the project site or within 100 feet (CDFW 2023e, Audubon 2023, City 2009). Based on a lack of suitable nesting habitat, such as tall trees or suitable man-made structures, raptors are not expected to nest on the project site. Suitable small raptor (e.g., Cooper's hawk) habitat is present in Old San Jose Creek in the study area beginning 170 feet west of the project site. The project site also lacks habitat for turkey vultures, herons, white-tailed kites, or other communally roosting species. The project site lacks suitable hunting perches and prey (e.g., small mammals). The project site is fragmented by existing development to the north, and higher value foraging and nesting habitat is available in the vicinity (e.g., Goleta Slough, More Mesa). Therefore, construction and operation of the project would not substantially limit reproductive capacity or reduce or eliminate the quantity or quality of raptor nesting or foraging habitat, or communal roosting areas.

Construction has the potential to result in direct and indirect impacts to non-special status nesting birds protected under the Migratory Bird Treaty Act, if they are nesting within the project site and/or immediate vicinity during construction activities. Nesting birds may occur within ruderal and native shrub vegetation on and adjacent to the project site and in trees along Old San Jose Creek. Direct impacts including the destruction of nests and mortality of eggs, nestlings, and birds would occur if

active nests were present within the project site during clearing and grading. Indirect impacts could also occur if active nests are located in the project site and vicinity and are abandoned due to visual and acoustic construction -related disturbance. Construction impacts to Migratory Bird Treaty Act protected nesting birds are potentially significant and mitigation is required. Indirect operational impacts to nesting birds would not occur since project operational noise would not exceed the ambient noise levels, landscaping would provide visual screening, and the project would not generate substantial additional dust.

Mitigation Measures

BIO-1 Nesting Birds and Raptors

To avoid construction impacts to nesting birds and raptors, the construction contractor shall conduct vegetation removal and initial ground disturbance outside the bird and raptor breeding season, which is typically February 1 through September 1 but can vary based on local and annual climatic conditions. If construction begins within the breeding season, then not more than seven days before demolition, ground disturbance, and/or vegetation removal commences, a bird and raptor preconstruction survey shall be conducted by a City-approved biologist (retained by the Applicant/Permittee) within the disturbance footprint, plus a 300-foot buffer. The survey shall be conducted by a biologist familiar with the identification of bird species known to occur in southern California.

The City-approved biologist shall conduct the preconstruction nesting bird and raptor surveys during the time of day when bird species are active and for a sufficient duration to reliably conclude presence/absence of nesting birds and raptors within the 300-foot buffer. The City-approved biologist shall submit a summary of the nesting bird and raptor survey results to the Planning and Environmental Review Director, or designee. Survey conclusions shall be reviewed and approved by the Planning and Environmental Review Director, or designee, prior to initiation of construction. If no bird nests are observed no further mitigation is required.

If an active nest of species protected by the California Fish and Game Code (§ 3503) or Migratory Bird Treaty Act are found within 300 feet of the disturbance footprint, the City-approved biologist shall flag their locations and map their locations on an aerial photograph of the disturbance footprint at a scale no less than 1”=200’ and/or recorded with the use of a Global Positioning System (GPS) unit. If active raptor nests are detected, the map shall include topographic lines, parcel boundaries, adjacent roads, known historical nests for protected nesting species, and known roosting or foraging areas, as required by Conservation Element Policy 8.3 of the Goleta Community Plan/Coastal Land Use Plan. The buffer shall be 300 feet in compliance with Conservation Element Policy 8.4 of the Goleta General Plan/Coastal Land Use Plan. If the 300-foot buffer is infeasible, the City-approved biologist may reduce the buffer distance as appropriate, dependent upon the species and the proposed work activities. If any active non-raptor bird nests are found, the City-approved biologist shall establish a suitable buffer area (varying from 25 to 300 feet), depending on the species. The construction contractor shall ensure that no ground disturbance occurs within the buffer until the City-approved biologist confirms that the breeding/nesting is completed and all the young have fledged and removes the buffer. If work within the buffer is necessary, a City-contracted biological monitor (funded by the Applicant/Permittee) shall monitor the active nest full-time during construction activities within the buffer to ensure project activities are not indirectly impacting protected nesting birds and raptors. If work ceases for more than 30 days, a new nesting bird survey shall be conducted in accordance with this measure.

Plan Requirements and Timing: The survey shall be conducted no more than seven (7) days prior to commencement of any demolition, grading, and/or vegetation removal activities. Survey conclusions shall be reviewed and approved by the Planning and Environmental Review Director, or designee, prior to the commencement of construction activities that could disturb suitable nesting habitat, such as demolition, grading, and/or vegetation removal. This measure, and any buffer requirements, shall be incorporated into the grading plans.

Monitoring: The Planning and Environmental Review Director, or designee, shall review any biological survey reports and conduct periodic site inspections to verify compliance with survey recommendations in the field.

BIO-2 Belding's Savannah Sparrow Avoidance

To avoid indirect impacts to nesting habitat for the Belding's savannah sparrow (*Passerculus sandwichensis beldingi* (BSS), the construction contractor shall schedule noise and vibration-generating construction (excavation) within 250 feet of suitable salt marsh (pickleweed) habitat within San Jose Creek and Old San Jose Creek to avoid the BSS breeding season. If avoidance during the BSS nesting season (March 15 through July 15) is infeasible, not more than 1 week before initiation of excavation a City-approved biologist (retained by the Applicant/Permittee) with experience identifying and observing BSS shall conduct BSS surveys in suitable habitat with 250 feet of construction to ensure that nests or individuals are not present in the work area or 250-foot buffer. The City-approved biologist shall conduct two morning surveys (1/2 hour before sunrise to 10:00 am) in saltmarsh habitat within 250 feet of the development footprint determine the presence of Belding's savannah sparrows in these areas. A recording of this species may not be used to detect the species unless the City-approved biologist has a Memorandum of Understanding issued by CDFW. The City-approved biologist shall note the type of bird activity observed and behavior such as defending territory, singing for a mate, scolding intruders, perching together, nest building, feeding young, and aerial chasing. If no BSS are observed within the 250-foot buffer excavation may commence. The City-approved biologist shall then continue weekly surveys during all project activities to monitor for the presence of the BSS from March 15 through July 15.

If an active BSS nest is observed within 250 feet of the development area, the construction contractor shall cease project activities within 250 feet of the nest, and the City-approved biologist shall contact the California Department of Fish and Wildlife (CDFW) and the City's Planning and Environmental Review Director within 48 hours. No project activities shall occur in in the 250-foot buffer until any young birds have fledged and left the area.

Verification that the construction schedule, surveys, and monitoring are being implemented shall be sent to the CDFW and the City. The City-approved biologist shall document observations of BSS on California Natural Diversity Database forms and submitted to the CDFW upon project completion.

Plan Requirements and Timing: Not more than 3 days before ground disturbance if ground disturbances commences between March 15 through July 15, including exporting or importing of soil, within 250 feet of salt marsh vegetation, the Planning and Environmental Review Director, or designee, shall verify that construction and grading occurs outside the nesting season, or that BSS nest surveys have been conducted, and buffer requirements specified above are in place (if applicable). This measure, and any buffer requirements, shall be incorporated into the grading plans. A 250-foot buffer from salt marsh habitat shall be depicted on the grading plans.

Monitoring: The Planning and Environmental Review Director, or designee, shall verify compliance not more than 1 week before ground disturbances within 250 feet of salt marsh vegetation if

commencing between March 15 through July 15. Planning and Environmental Review Director, or designee, shall conduct periodic site inspections to ensure compliance throughout the construction period.

Significance After Mitigation

Implementation of Mitigation Measure BIO-1 would reduce potential direct and indirect short-term construction impacts to nesting birds (if present) to less than significant by establishing avoidance buffers around nests when construction occurs during the nesting season. Mitigation Measure BIO-2 requires focused surveys and avoidance of BSS for ground disturbance during the BSS nesting season. With the implementation of these measures, impacts would be reduced to less than significant.

Impact BIO-2 CONSTRUCTION OF THE PROPOSED OUTFALL WITHIN SAN JOSE CREEK COULD RESULT IN TEMPORARY NOISE AND WATER QUALITY IMPACTS TO TIDEWATER GOBIES AND STEELHEAD. A COFFERDAM WOULD BE INSTALLED DURING WORK WITHIN SAN JOSE CREEK TO PREVENT AQUATIC SPECIES FROM ENTERING THE WORK AREA. CONSTRUCTION IMPACTS TO AQUATIC SPECIES WOULD BE CLASS II, LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Special-status aquatic species with potential to occur and critical habitat designated in the San Jose Creek channel include the tidewater goby (resident) and steelhead (migrant).

Construction Noise and Stormwater Impacts

Construction noise could result in temporary impacts to individual tidewater gobies and steelhead (Watershed 2023a). Temporary impacts would include altering the behavior and physical health of gobies and steelhead that are subjected to vibration or movement flow. However, work is proposed in the channel using hand tools and concrete saws. Heavy vibration (e.g., pile diving) are not proposed and vibration impacts from the use of a dozer would be less than significant as evaluated under Section 4.11, *Noise*. As required by Mitigation Measure NOI-1, a sound barrier would be erected at the edge of San Jose Creek which would reduce noise along San Jose Creek and reduce the proposed project's indirect impact from noise to tidewater gobies and steelhead to a less than significant level.

Indirect sediment and stormwater construction impacts would be less than significant with adherence to existing regulations requiring the implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP is required to include the use of biodegradable best management practices (except silt fencing and gravel bags removed upon project completion). However, even with implementation of the SWPPP, short-term water quality impacts from fuel, oil, lubricants, paints, release agents, and other construction materials; erosion; increased turbidity; excessive sedimentation; and accidental fuel spills during construction could also lead to contamination of soils and habitat degradation. Indirect impacts to aquatic habitat from pollutant spills would be potentially significant, and implementation of Mitigation Measure BIO-3 would reduce impacts to a less-than-significant level.

In-Stream Construction Impacts

Construction of the drainage outfall in the San Jose Creek channel has the potential to directly affect aquatic habitat and species, including for tidewater goby and steelhead. Dewatering the work area creates a risk to aquatic species, as they may be injured or killed during construction, impinged during dewatering (particularly if pumps are used), or stranded in dewatered areas. Water diversion can result in fish injury or mortality. Short-term increases in turbidity may occur if water diversion and dewatering of the freshwater channel is required, during the first flush of the stream channel when

re-watered, and during the first rainstorms that may mobilize disturbed sediments. According to NMFS, diversion could affect water quality up to 350 feet downstream from the end of the diversion (NMFS 2019). Water quality is an important feature of steelhead critical habitat and elevated turbidity can affect juvenile steelhead (NOAA 2019). A diversion within San Jose Creek could result in significant direct impacts to special-status aquatic individuals and indirect impacts on downstream habitat, and Mitigation Measure BIO-3 would be required to reduce impacts to a less-than-significant level.

The Biological Report Amendment describes that before outfall construction, a 20-foot by 20-foot (400 square foot) temporary staging area would be established in the creek bed below the new drainage outfall. A crane would lower sandbags and plastic sheeting into the creek bed to create a temporary cofferdam to prevent water from entering the work area. Activities in the temporary staging area include the removal of 36 square feet of the concrete-lined creek bank, installing the new 18-inch diameter outfall, and replacing the concrete on the creek bank that was removed. Construction would take 3 to 4 weeks to complete and would be scheduled to avoid peak high tides if the Goleta Slough mouth is open. No heavy equipment would be used or operated within this staging area in the creek bed. Crews on foot would access the temporary work area from the end of the SBCFCD concrete-lined access ramp. Crews would use hand tools (i.e., shovels, rakes and brooms, dust pans, and wheelbarrows) to collect and remove any debris that falls or washes into the staging area. The cofferdam would be removed 10 to 15 days after the concrete has been poured on the creek bank to allow time for the concrete to cure before coming into contact with tidal surface water. Construction is proposed during the dry season (June 1 to October 15) (Watershed Environmental 2023a).

The cofferdam would be a physical barrier that would prevent high tides and aquatic species from entering the work area. The cofferdam would physically divert water if creek flows were present and/or the area becomes subject to daily tides if the Goleta Slough mouth is open. Construction is proposed during the dry season when the freshwater channel is dry and aquatic species cannot migrate upstream. During the dry season dewatering pumps in addition to the cofferdam barrier would not be needed. The cofferdam would only block a portion of the channel since it would protrude 20 feet into the 65-foot-wide channel. The cofferdam would not block aquatic species from reaching their upstream habitat. The cofferdam would also prevent dirt, concrete rubble, and wet cement from coming into contact with surface water in the creek. Impacts related to fish species would be reduced with adherence to existing regulations, including federal Endangered Species Act Section 7 consultation with NMFS (steelhead) and USFWS (tidewater goby) required prior to issuance of the USACE Section 404 Permit for drainage outfall construction. Each of these agencies would issue a Biological Opinion or concurrence letter. However, impacts are potentially significant and mitigation is required to ensure the cofferdam is appropriately installed during the dry season to reduce impacts during construction of the outfall (Watershed Environmental 2023a).

Operational Impacts

Operation of the project could result in impacts to San Jose Creek from the introduction of a new outfall structure and reduction in the stormwater flows into the creek from increased onsite detention. The development and use of 102 asphalt parking spaces would introduce pollutants such as oil and grease, hydrocarbons, heavy metals, soot, sediment, and human generated trash.

As discussed in Section 4.9, *Hydrology and Water Quality,* the proposed project includes a new detention basin with hydrodynamic separator and vegetated drainage swale with catch basin insert filter to partially retain stormwater flows and treat pollutants in compliance with the County's adopted *Stormwater Technical Guide for Low Impact Development* guidelines which is designed to

ensure post-construction requirements described in the Central Coast RWQCB's *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region* are satisfied. As described in Impact HYD-1, the construction and operation of the proposed project be conducted in compliance with applicable regulatory requirements related to stormwater runoff to minimize the potential for pollutants to degrade water quality. Presently, stormwater collects at two locations and is pumped directly into San Jose Creek without treatment.

Development area stormwater runoff would be collected from drop-inlets in the parking lot and adjacent to the new structure and directed to a stormwater detention basin. The basin outlet is elevated above the basin bottom to allow stormwater treatment for two times an 85th percentile storm (2.6 inches of rainfall)[4]. Discharge from the detention basin would be conveyed to a hydrodynamic separator and then to an 18-inch diameter outfall on the concrete-lined western bank of San Jose Creek (see Figure 4.3-4). The discharge point is below the 7.1-foot-high tide line, and a flap gate would be installed to prevent tidal water from high tides from flowing into the outfall. The detention basin and hydrodynamic separator has the potential to remove total suspended solids, hydrocarbons, nutrients, metals, and other common pollutants. Following treatment (settling and percolation) in the basin, perforated pipes collect infiltrated runoff, which is then discharged to the San Jose Creek channel. Native plant species are currently proposed for the basin in the landscape plan.

The existing 8-inch diameter outfall plastic pipe from the northernmost sump pump to San Jose Creek would be abandoned in place. The 8-inch diameter outfall plastic pipe from the southern sump pump to San Jose Creek would remain. This existing outfall would continue to remove rainwater that collects in the 19,584-square-foot portion of the property that would not be developed and detention basin overflow from storm events larger than two times the 85th percentile stormwater elevation.

While the development and use of 102 new asphalt parking spaces and industrial buildings could introduce new sources of potential water quality contamination, installation of a stormwater detention basin, hydrodynamic separator, vegetated drainage swale, and catch basin inlet filter would improve San Jose Creek water quality overall compared to the existing untreated sheet flows. As discussed under Section 4.9*, Hydrology and Water Quality*, Impact HYD-1, impacts from stormwater runoff would be less than significant with adherence to existing regulations. Impacts from pollutant runoff to aquatic special status species habitat would also be less than significant.

The operation of the drainage outfall would not affect the physical or biological habitat features essential to migrating adult steelhead (e.g., water quantity to allow for juvenile and adult mobility; cover, shelter, and holding areas; and adequate water quality) or the tidewater goby (e.g., water depth, substrate, and seasonally open sandbar mouth). The tidal flap covered drainage outfall above the mean high tide line in the existing concrete bank is not expected to result in any change to channel morphology, sediment transport, or vegetation. The drainage outfall would only discharge water during major precipitation when the creek would already be flowing. The habitat characteristics and conditions that are important to sustain steelhead migration and tidewater gobies through this reach are expected to remain the same. No long-term effect would result to steelhead habitat since the in-creek work is the replacement of existing concrete in-kind.

During the long-term life of the project, San Jose Creek would no longer receive stormwater runoff from the development area unless the detention basin fills to capacity and overflows (Watershed Environmental 2023b). The difference in runoff rates between pre- and -post-project implementation

[4] The 85th percentile storm water elevation for a particular location is the amount of rainfall equal to or greater than produced by 85 percent of storms that have occurred in an area over a specified duration, based upon long-term historical records of local storm events.

would not be substantial. The volume of stormwater runoff as a result of the detention basin is expected to decrease post-project from 11.5 cfs to 4.01 cfs for a 2-year storm event and from 38.05 cfs to 13.39 cfs for a 100-year storm event (Appendix H). A reduction in water discharge to the creek as a result of the proposed detention basin could affect aquatic species. However, the existing and proposed site runoff is only discharged into San Jose Creek during storm events when the channel is flooded and flows downstream into the Goleta Slough or Pacific Ocean. For example, during a 2-year return interval flow event the San Jose Creek Watershed generates 162 cfs of flood flow, whereas during the same event post-project run-off would be reduced by 7.54 cfs (City of Goleta 2020, Appendix H). Given the volume of water present in the creek during storm events, the size of the watershed, and volume of flood flows and daily tidal shifts (when the Goleta Slough mouth is open) a marginal reduction in peak stormwater flows would not significantly impact tidewater goby and steelhead individuals or San Jose Creek habitat.

Given that the replacement drainage outfall would be outfitted with a flap to prevent tidal intrusion and that the pipe would not protrude into the channel, mortality, or injury to aquatic species from inadvertent trapping of aquatic species is not anticipated. As part of the SBCFCD encroachment permit process, the drainage outfall shall meet design standards. Consultation with USFWS and NMFS for impacts to tidewater gobies and steelhead would be required as part of the USACE 404 Certification process. Operational impacts to individuals would be less than significant with adherence to required permits.

Mitigation Measures

Mitigation Measure NOI-1, described in Section 4.11, *Noise*, is required. In addition, the following measure is required.

BIO-3 Tidewater Goby and Southern California Steelhead Habitat Protection

To avoid and minimize impacts to jurisdictional aquatic resources, tidewater goby critical habitat, and Southern California steelhead critical habitat the Applicant/Permittee must:

A. Develop and receive approval from the Planning and Environmental Review Director or designee of a Toxic Materials Control and Spill Response Plan for materials that may be used/stored on-site, such as petroleum-based products, fuel and lubricants, and other potentially toxic materials prior to the issuance of the Zoning Clearance for grading or construction activities whichever is permitted first. The plan shall specify that cleaning and refueling of equipment and vehicles during construction shall occur only within designated staging areas that are at least 100 feet from San Jose Creek and Old San Jose Creek. The Toxic Material Control and Spill Response Plan must be implemented by the contractor if needed throughout the construction period.

B. Provide the City Planning & Environmental Review Department Director or designee with copies of permits and/or waivers or similar from the USACE (including NMFS and USFWS Section 7), RWQCB, and CDFW for storm drain outlet work prior to the issuance of the Zoning Clearance grading permit.

C. Schedule the storm drain outlet work on San Jose Creek to occur during the dry season (June 1 to October 15) when surface water flows are low and during low tides when no surface water is present in the staging area. It shall also be scheduled to avoid peak high tides. No concrete or any cement products shall be used within 150 feet of San Jose Creek during the rainy season, or when there is a 25 percent or greater chance of 0.10 inches of rain within 10 days of a scheduled cement pour. The cofferdam installed in the creek bed staging area shall be removed 10-15 days after the

concrete has been poured on the creek bank at the detention basin outfall location to allow time for the concrete to cure before coming into contact with tidal surface water.

Plan Requirements and Timing: These requirements and prohibitions shall be included and the cleaning and refueling area depicted on all construction plans submitted for grading or building permit issuance. The Toxic Materials Control and Spill Response Plan must be approved by the Planning and Environmental Review Director, or designee, prior to grading or building Zoning Clearance permit issuance. ESHA fencing shall be erected prior to construction.

Monitoring: The Planning and Environmental Review Director, or designee, shall verify compliance prior to grading or building permit Zoning Clearance issuance and shall conduct periodic site inspections to verify compliance in the field. All costs associated with the development of the Toxic Material Control and Spill Response Plan, City review, and ongoing implementation including any peer reviews determined necessary by the City are borne by the Applicant/Permittee.

Significance After Mitigation

With adherence to Mitigation Measure NOI-1, a sound barrier would be erected at the edge of San Jose Creek which would reduce noise along San Jose Creek. Implementation of Mitigation Measure NOI-1 would reduce the proposed project's indirect impact from noise to tidewater gobies and steelhead to a less than significant level. With adherence to Mitigation Measure BIO-3 for tidewater goby and steelhead requiring habitat protection, adverse impacts to aquatic species would be reduced to less than significant. Mitigation Measure BIO-3 requires construction activities within San Jose Creek to occur when the freshwater channel is dry, which would reduce impacts to less than significant because aquatic species cannot migrate upstream when the channel is dry. Short-term water quality impacts accidental fuel and oil spills would be less than significant with the preparation of a Toxic Materials Control and Spill Response Plan.

Impact BIO-3 CONSTRUCTION OF THE PROJECT COULD RESULT IN DISPLACEMENT OR MORTALITY TO MIGRATING CALIFORNIA RED-LEGGED FROGS AND WESTERN POND TURTLE, IF PRESENT, DURING FAVORABLE CONDITIONS FOR DISPERSAL. DIRECT AND INDIRECT CONSTRUCTION IMPACTS TO SEMI-AQUATIC SPECIES WOULD BE CLASS II, LESS THAN SIGNIFICANT WITH MITIGATION

During project construction there is a possibility of mortality or injury to special-status semi-aquatic species (e.g., CRLF, western pond turtle) if they are present in the San Jose Creek and Old San Jose Creek corridor during conditions favorable to migration (e.g., during or immediately after rain events, heavy fog, or high humidity). Initial construction near the creek might temporarily impede the movement of juvenile and adult life stages of special-status amphibians and reptiles dispersing between breeding areas and summer refugia sites. If present, injury or mortality could occur through accidental crushing, either by construction equipment or foot traffic from workers. Displacement from cover due to construction could expose these species to predators and desiccation. Additionally, amphibians or reptiles moving through the construction area could become trapped in open trenches left overnight. The initial construction noise and disturbance may also indirectly impact species, if present in the San Jose Creek and Old San Jose Creek corridor, by altering their migration behaviors. After construction begins migrating individuals would be expected to avoid the area. Mortality among semi-aquatic and species resulting from construction has the potential to be significant and mitigation is required.

New upland development is proposed in an existing area mapped as developed and ruderal that lacks terrestrial refugia. If an individual CRLF or western pond turtles were present in San Jose Creek, the

tidal flap-covered outfall would not interrupt movement to higher-quality habitat upstream. Operational impacts would be less than significant as project operational activities would not occur within CRLF or western pond turtle habitat, and would be limited to the developed portion of the project site.

Mitigation Measures

BIO-4 Preconstruction Semi-Aquatic Species Survey

Prior to the start of construction activities for the proposed outfall to San Jose Creek, a City-approved biologist (retained by the Applicant/Permittee) shall conduct a preconstruction survey for semi-aquatic species (e.g., California Red-legged Frog, western pond turtle) of the development area and within a 100-foot buffer from San Jose Creek. The survey shall be completed within seven days in dry conditions or within 48 hours in favorable conditions for upland amphibian migration (e.g., during or immediately after heavy rain events, heavy fog, or high humidity). The survey shall include the development area within a 100-foot buffer from San Jose Creek and Old San Jose Creek, and the buffer emphasizing native vegetation, as these areas are more likely to harbor special-status wildlife than cleared areas. The City-approved biologist shall submit a summary of the survey results to the Planning and Environmental Review Director, or designee, for review and approval prior to initiation of ground disturbance for the proposed outfall.

If a special status species is identified during construction, the construction contractor shall halt construction activities and contact the biologist. If identified during pre-construction surveys, individual special-status species in the work area shall be allowed to move out of the work area of their own volition. If special-status species are detected and do not move out of the work area, a Species Relocation and Exclusion Plan shall be prepared by the City-approved biologist and submitted to the Planning and Environmental Review Director, or designee, for approval prior to relocation. The Species Relocation and Exclusion Plan shall specify that if relocation by humans is required, the animal shall be captured by a City-approved biologist and relocated out of harm's way to the nearest suitable habitat, a minimum of 100 feet from the maintenance project work area where it was found. Species listed as threatened or endangered (e.g., California Red-legged Frog) shall only be handled as authorized by United States Fish and Wildlife Service. The City-approved biologist shall document observations of special-status species on California Natural Diversity Database forms and submit the documentation to the California Department of Fish and Wildlife upon project completion. If one or more special status semi-aquatic species are detected, surveys are required each day prior to outfall construction activities. Construction of the outfall can commence when the semi-aquatic species moves or is relocated out of the work area and when approved by the City-approved biologist. If construction of the outfall ceases for more than 30 days, a special status survey is required.

Plan Requirements and Timing: Prior to the initiation of ground disturbance for the proposed outfall, a summary of the survey results shall be transmitted via email to Planning and Environmental Review Director, or designee. If no special-status species are found, grading activities can commence and no further reporting is required.

If species are detected and do not move out of the work area, a Species Relocation and Exclusion Plan shall be prepared by the City-approved biologist and submitted to the Planning and Environmental Review Director, or designee, for approval prior to relocation and commencing outfall construction. A new survey is required prior to construction. If species are detected a Survey Report shall be submitted to the Planning and Environmental Review Director, or designee within 14 days of the survey and any relocation.

Monitoring: The Planning and Environmental Review Director, or designee, shall review any biological survey, relocation, or exclusion reports in consultation with any resource/trustee agency as needed. The Planning and Environmental Review Director, or designee, shall conduct periodic site inspections to verify compliance with survey recommendations in the field. All costs associated with the development of the Species Relocation and Exclusion Plan, City review, and ongoing implementation including any peer reviews determined necessary by the City are borne by the Applicant/Permittee.

BIO-5 Biological Monitor and Worker Education

A City-contracted biological monitor (funded by the Applicant/Permittee) familiar with special-status plant and wildlife species with the potential to occur in the project work area shall be present during all work within 100 feet of San Jose Creek and Old San Jose Creek during construction activities to ensure compliance with all mitigation measures. The monitor shall be responsible for the following:

A. Ensuring that procedures for verifying compliance with biological resource mitigation measures are followed.
B. Lines of communication and reporting methods.
C. Daily and weekly reporting of compliance.
D. Construction crew Worker Environmental Awareness Training Program (WEAP) training.
E. Authority to stop non-emergency work.
F. Action to be taken in the event of non-compliance.
G. Conducting daily wildlife sweeps prior to construction.

The biological monitor shall also conduct a Worker Environmental Awareness Training Program for construction personnel prior to the commencement of construction activities and new personnel or crews after construction is initiated. As needed, training shall be conducted in Spanish for Spanish language speakers.

Plan Requirements and Timing. This measure shall be incorporated into the grading plans and the WEAP will be available on-site during construction. The City-approved biological monitor shall submit a monitoring summary to the Planning and Environmental Review Director, or designee, within 14 days of each phase of construction such as rough grading, precise grading, storm drain outlet, vertical construction, and project completion.

Monitoring: Monitoring summaries shall be kept on file with the City for the duration of construction.

Significance After Mitigation

Mitigation Measure BIO-4 requiring preconstruction surveys, avoidance, and relocation and Mitigation Measure BIO-5 requiring biological monitoring would reduce project construction impacts to migratory semi-aquatic to less than significant.

Impact BIO-4 CONSTRUCTION OF THE PROPOSED PROJECT COULD IMPACT FORAGING/TRANSIENT SPECIAL-STATUS INSECTS AND BATS. INDIVIDUAL INSECTS WOULD BE EXPECTED TO ESCAPE DIRECT IMPACTS. SPECIAL-STATUS BATS WOULD BE EXPECTED TO BE PRESENT ON-SITE ONLY AT NIGHT, OUTSIDE CONSTRUCTION HOURS. CONSTRUCTION AND OPERATIONAL IMPACTS TO SPECIAL-STATUS BAT AND INSECT SPECIES WOULD BE CLASS III, *LESS THAN SIGNIFICANT*

Project construction has the potential to directly affect special-status insects (monarch butterfly and Crotch bumble bee) if present during vegetation clearing. The potential is low that either the foraging

monarch butterfly or Crotch bumble bee would be present at the initiation of construction since the small patch (0.19 acres) of impacted coastal sage scrub foraging habitat within the development area lacks preferred host plants, is limited in size, was previously developed, and surrounded by disturbance. Foraging individuals are mobile and would be expected to escape to avoid impacts. Given the expanse of food sources and habitat south of the project site in the Goleta Slough and along the coast, the removal of 0.19 acres of marginal disturbed native shrubland would not significantly impact regional nectar sources. Project operation would not affect these insect species given that noise and dust would not be above existing ambient levels, and as discussed in Section 4.1, *Aesthetic*s, lighting would be shielded, and vegetative screening would reduce glare. Impacts to special-status insects would be less than significant.

Special-status bat species (Pallid bat, Townsend's big-eared bat, Western red bat, and Western mastiff bat) have a low potential to forage over the project site. The nocturnal foraging behavior by bats would not be affected by construction noise, because the construction work would occur during the day. Existing project site buildings are sealed and maintained and are not expected to host bat roosts. Therefore, demolition of the existing building would not directly impact bat roosts. Caltrans recommends a buffer of 150 feet from most species' day and night roots for drilling, trenching, and small equipment (Caltrans 2021, Table 7-1). Bats have a low potential to roost in the study area within the Old San Jose Creek riparian cottonwood trees, located over 170 feet west of the project site which is greater than the recommended buffer. Construction and operation impacts to foraging special-status bat foraging or roosting habitat would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2: CEQA Guidelines: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

County:

Coastal Salt Marsh. Project created impacts may be considered significant due to the potential to change species composition and habitat value through: substantial alteration of tidal circulation or decrease of tidal prism; adverse hydrologic changes; substantial increase of sedimentation, introduction of toxic elements or alteration of ambient water temperature; construction activity which creates indirect impacts such as noise and turbidity on sensitive animal species, especially during critical periods such as breeding and nesting; disruption of wildlife dispersal corridors; or disturbance or removal of substantial amounts of marsh habitats.

Riparian Habitats. Project created impacts may be considered significant due to: direct removal of riparian vegetation; disruption of riparian wildlife habitat, particularly animal dispersal corridors and or understory vegetation; or intrusion within the upland edge of the riparian canopy leading to potential disruption of animal migration, breeding, etc. through increased noise, light and glare, and human or domestic animal intrusion; or construction activity which disrupts critical time periods for fish and other wildlife species.

Impact BIO-5 CONSTRUCTION AND OPERATION OF THE PROJECT COULD RESULT IN INDIRECT IMPACTS TO SENSITIVE COMMUNITIES OR ENVIRONMENTALLY SENSITIVE HABITAT AREAS (ESHAS) FROM CONSTRUCTION DUST, STORMWATER AND THE INTRODUCTION OF INVASIVE SPECIES. IMPACTS WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

Vegetation on the project site and development area consists mainly of disturbed or ruderal areas dominated by non-native grasses and forbs. No sensitive communities are present on the project site. The project would not result in direct impacts on sensitive communities or ESHA communities. Sensitive communities and ESHA that could be indirectly affected are found in San Jose Creek and Old San Jose Creek.

Sensitive communities within the study area include San Jose Creek vegetation within the top-of-bank and Old San Jose Creek Pickleweed Mats and Arroyo Willow Thickets (Figure 4.3-1). San Jose Creek Open Water and concrete pavers where the drainage outfall is proposed are classified as ESHA, specifically a SPA. Impacts on San Jose Creek as water/wetland are evaluated under Impact BIO-6. Impacts specific to the San Jose Creek SPA are included under Impact BIO-8. Pickleweed Mats in Old San Jose Creek are within 100 feet of the southernmost utility undergrounding; refer to Impact BIO-9 for a discussion of Policy CE 3 wetland buffers.

Sensitive communities or ESHA adjacent to the study area may be indirectly impacted during construction by dust, inadvertent encroachment, stormwater runoff, and the introduction of invasive species. The study area is outside the City's Wildland Fire Hazard Area; therefore, fuel modification is not required. Excessive dust can impact plant photosynthesis, respiration, transpiration. Off-site indirect dust impacts would be addressed through adherence to Santa Barbara County Air Pollution Control District requirements. Stormwater run-off impacts would be less than significant with adherence to existing regulations. Impacts to San Jose Creek and Old San Jose Creek habitat from inadvertent fuel spills would be potentially significant.

Invasive plant species are non-native organisms that escape into surrounding ecosystems and become established and proliferate. Many invasive species form monocultures (dense stands of one plant) that push out native species and impair wildlife habitat (Cal-IPC 2023). Some invasive species change fundamental processes in ecosystems, including the hydrologic cycle, fire regimes, and soil chemistry. The planting of non-native, invasive species reduces the available habitat for native plant and wildlife species within the project limits and may cause the spread of invasive species to adjacent areas, including downstream Goleta Slough ESHA. Similarly, the use of nonnative, invasive species in erosion control seed mixes or introduced from contaminated equipment during construction would potentially cause the spread of invasive species to adjacent areas along San Jose Creek and Old San Jose Creek. Once established, these plants spread by seeds borne on wind or water, birds eating berries, burrs that adhere to fur or clothing, and other means (Cal-IPC 2020). Impacts to off-site Goleta Slough and Old San Jose Creek sensitive communities and ESHA (e.g., Pickleweed Mats, Arroyo Willow Thickets) from the introduction of invasive species would be potentially significant and mitigation is required.

Mitigation Measures

In addition to Mitigation Measure BIO-3 protecting aquatic ESHA and Mitigation Measure BIO-5 requiring biological monitoring, the following mitigation measures are required.

BIO-6 Landscaping: Invasive Species

Non-native, invasive plant species shall not be included in landscaping plans associated with the project. The California Invasive Plant Inventory Database contains a list of non-native, invasive plants (Cal-IPC 2023, or its successor). The Applicant/Permittee's landscape plan and, if required the Habitat Restoration Plan for the SPA buffer area, shall reflect the use of non-native invasive plants and be approved by the Design Review Board prior to the issuance of the Zoning Clearance permit for the building construction.

Further, prior to issuance certificate of occupancy, the Planning and Environmental Review Director, or designee, shall inspect landscape planting features and habitat restoration areas (if required) to ensure that they have been installed consistent with approved plans.

Plan Requirements and Timing: The Landscaping and Habitat Restoration Plan shall be approved by the Design Review Board prior to issuance of grading or building Zoning Clearance, whichever occurs first.

Monitoring: The Planning and Environmental Review Director, or designee, shall verify compliance before Zoning Clearance for grading or building issuance. Prior to issuance certificate of occupancy, the Planning and Environmental Review Director, or designee, shall inspect landscape planting features to ensure that they have been installed consistent with approved plans.

BIO-7 Invasive Species Control Plan

The City-approved biologist (retained by the Applicant/Permittee) shall prepare an Invasive Species Control Plan for all construction equipment and activities within 100 feet of San Jose Creek. The Invasive Species Control Plan, which shall be implemented by the construction contractor(s), shall also include, but not be limited to, the following measures to prevent the introduction of invasive weed species:

A. imported fill material shall be obtained from a source that is known not to be infested with invasive plant species.
B. Stockpile topsoil shall be redeposited after construction or transported to a permitted landfill for disposal in order to minimize colonization of disturbed areas and spread of invasive species.
C. All erosion control materials, including straw bales, straw wattles, or mulch used on-site shall be free of invasive species seed.
D. Exotic and invasive plant species shall be excluded from any erosion control seed mixes and/or landscaping plant palettes associated with the proposed project.
E. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas.

Plan Requirements and Timing: The Invasive Species Control Plan shall be approved by the Planning and Environmental Review Director, or designee, prior to issuance of the Zoning Clearance for grading or building permits, whichever occurs first.

Monitoring: The Planning and Environmental Review Director, or designee, shall verify compliance before Zoning Clearance for grading or building issuance. During construction , the Planning and Environmental Review Director, or designee, shall verify compliance with the Invasive Species Control Plan. All costs associated with the development of the Invasive Species control Plan, City review, and

ongoing implementation including any peer reviews determined necessary by the City are borne by the Applicant/Permittee.

Significance After Mitigation

Indirect impacts to sensitive habitats and ESHA outside the development area would be less the significant with implementation of Mitigation Measure BIO-5 requiring monitoring with 100 feet of ESHA and Mitigation Measure BIO-6 and BIO-7 prohibiting invasive and exotic species. Indirect impacts from a toxic materials spill would be less than significant with preparation of a Toxic Materials Control and Spill Response Plan required under Mitigation Measure BIO-3.

Threshold 3: Would the project have a substantial adverse effect on state or federally-protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

County: Projects which result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or would threaten the continuity of wetland-dependent animal or plant species are considered to have a potentially significant effect on the environment. Projects which substantially interrupt wildlife access, use and dispersal in wetland areas would typically be considered to have a potentially significant impact. Projects which disrupt the hydrology of wetlands systems would be considered to have a potentially significant impact.

Impact BIO-6 CONSTRUCTION OF THE PROPOSED OUTFALL AND TEMPORARY COFFERDAM IN SAN JOSE CREEK WOULD TEMPORARILY IMPACT 588 SQUARE FEET OF STATE AND LOCALLY REGULATED STREAMBED, INCLUDING 497 SQUARE FEET OF FEDERAL UNVEGETATED TIDAL WATERS AND 416 SQUARE FEET OF A STATE MARINE PROTECTED AREA. THE COFFERDAM WOULD PREVENT INDIRECT IMPACTS FROM WATER QUALITY DEGRADATION BUT WOULD ALSO INTRODUCE FILL AND INTERRUPT THE TIDAL HYDROLOGY. INDIRECT CONSTRUCTION IMPACTS COULD OCCUR IF WORK OCCURS OUTSIDE THE DEVELOPMENT AREA. DIRECT AND INDIRECT CONSTRUCTION IMPACTS ON WATERS AND WETLANDS FROM WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.*

Direct removal refers to the physical removal of wetland vegetation, soils, or other features that can result in the loss of biodiversity and displacement of vegetation and wildlife. Filling wetlands involves depositing materials, such as soil, sand, or debris that can alter the wetland's topography, reduce its capacity to hold water, and interfere with the hydrological function of the wetland. Any interruption to hydrological processes, such as periodic flooding, through altering drainage patterns or impeding water flow, can negatively impact wetland vegetation, wildlife, and overall ecological functions. "Other means" includes a wide range of actions or practices that can harm wetlands and can include introduction of harmful substances (e.g., chemicals, pollutants, invasive species), habitat fragmentation, or other forms of disturbance that impede the ecological functioning of the wetland.

The only development proposed in waters/wetlands is the San Jose Creek detention basin drainage outfall. The outfall is proposed at an elevation of 5.5 feet above the MPA 4.51-foot mean-high tide line but below the 7.10-foot high tide line. Installation of the detention basin outlet pipe on the western bank of San Jose Creek would temporarily impact a 588 square feet of state and locally regulated streambed, including 497 square feet of federal unvegetated tidal waters and 416 square feet of the MPA as shown below under Table 4.3-5.

Table 4.3-5 Temporary Impacts on USACE, RWQCB, CCC, and CDFW Jurisdiction

	USACE		RWQCB		CDFW	CCC/City
Impact Type	Tidal Waters of the U.S. (square feet [ft]/ linear ft)	Wetland Waters of the U.S. (square ft/linear ft)	Tidal Waters of the State square ft/ linear ft)	Other Waters of the State (square feet/ linear ft)	CDFW Streambed (square ft/ linear ft) and MPA (acres)	Coastal Wetland (square ft/ linear ft)
San Jose Creek Temporary workspace	497/20	N/A	497/20	91/20	588/20 416	588/20

The USACE jurisdictional temporary impacted area covers the tidal area of San Jose Creek below the 7.1-foot-high tide line. The CDFW, RWQCB, CCC, and City-impacted area includes the USACE jurisdiction but also extends to the topographic top-of-bank on the west side of San Jose Creek.

Construction and operation of the drainage outfall in San Jose Creek would be subject to permitting through the USACE Section 404 Permit, CDFW Streambed Alteration Agreement, CCC Coastal Development Permit, SBCFCD Encroachment Permit, and RWQCB Section 401 Certification. Since located in steelhead and tidewater goby critical habitat, USFWS and NMFS Section 7 consultation is required. These agencies may have specific construction and mitigation requirements. As discussed under Section 4.9, *Hydrology and Water Quality*, effective combinations of temporary and permanent erosion and sediment controls would be used to minimize impacts to water quality during construction and operation.

Construction Impacts

As discussed above under Impact BIO-2, construction is proposed during the dry season and a cofferdam would be established around the 400-square-foot outfall work area. The drainage outfall would be installed using conventional buried pipe installation construction techniques as permitted by SBFCD and resource agencies. Concrete saws would be used to cut through approximately 36 square feet of the concrete creek. The concrete on the creek banks is expected to be 4 to 6 inches thick and reinforced with steel rebar. After the concrete and rebar are cut, jackhammers would be used to break up the concrete into small pieces that can be picked up and loaded into an excavator bucket. The excavator would be operated from within a 1,500-square-foot upland staging area on the SBCFCD dirt access road. The excavator would temporarily stockpile the concrete rubble in the upland staging area. After the concrete has been removed, it would be loaded into dump trucks and taken off-site. An excavator would then dig a narrow 2- to 3-foot wide by 10- to 12-foot-deep trench to install the drainage outfall. The upland staging area would also be used to temporarily store trench shoring when not in use and sand used to backfill the drainage outfall. Equipment staged in uplands includes an excavator, water truck, skip loader, forklift, cement truck, and cement pumper. All erodible materials that are temporarily stockpiled in the staging area will be covered when not actively used. The existing 8-inch diameter plastic pipe used to discharge stormwater from the northernmost sump pump to San Jose Creek would be abandoned in place. Construction activities such as excavation within the creek has the potential to directly remove or degrade existing waters/wetlands. In addition, the use of nonnative, invasive species in erosion control seed mixes or introduced from contaminated equipment during construction would potentially cause the spread of invasive species to adjacent areas along wetlands in San Jose Creek. Therefore, construction activities would have a potentially significant impact on waters/wetlands, and mitigation would be required.

An indirect temporal effect to wetlands is typically the vegetation recovery time between the installation of restoration and the growth of plantings to provide the functions and values of the intended mitigation (CCC 2022). However, the work in the San Jose Creek is proposed entirely in a concrete channel and bank and would not require the removal of vegetation or any other existing ecological function. Therefore, no indirect temporal impacts would result given that the work areas would be replaced with concrete consistent with the continued management of San Jose Creek.

With construction during the dry season, impacts to the freshwater hydrological process would be less than significant since freshwater would not be present. Construction would result in the temporary placement of fill partially in a tidal water for the cofferdam. As discussed under Impact BIO-3, temporary impacts to the channel would be less than significant with mitigation.

Indirect short-term construction impacts to San Jose Creek may result if accidental clearing, trampling, or grading occurs outside the development area limits shown in Figure 4.3-4 at the creek outfall. Impacts may include inadvertent damage from equipment, crushing, or the introduction of chemicals and exhaust into an ESHA buffer. Impacts from a change in the intensity of work in the outfall work areas or work outside the development area boundary would be potentially significant and mitigation is required.

Operational Impacts

The drainage outfall would not protrude into the stream and would be closed when not in use by a tidal flap. As such, the drainage outfall would not result in hydrological interruption, or fill and would not affect sediment and nutrients that would otherwise be carried by storm runoff into coastal waters. The operation of the outfall is not anticipated to significantly disrupt the hydrology of San Jose Creek, including a reduction in storm flows discussed under Impact BIO-3.

Removing the existing concrete banks, construction of the drainage outfall, and in-kind replacement with concrete in the channelized San Jose Creek would not result in a net loss of wetlands acreage (direct removal) or ecological function. Flood-control management in the lower Goleta Slough has confined the natural floodplain and limited opportunities for riparian communities to become established (SBCFCD 2010). San Jose Creek in the study area is actively managed and is not suited for restoration. Therefore, revegetation of the temporary impact area and mitigation for the in-kind concrete replacement is not required and the drainage outfall. Since the drainage outfall is proposed on the bank of the concrete-lined channel, the outfall would not permanently impact any federal, state, or local regulated waters or wetlands. Project direct and indirect operational impacts to waters/wetlands would be less than significant.

Mitigation Measures

In addition to Mitigation Measure BIO-3 protecting aquatic ESHA, Mitigation Measure BIO-5 requiring biological monitoring, and Mitigation Measures BIO-6 and BIO-7 prohibiting invasive species the following mitigation measure is required.

BIO-8 Environmentally Sensitive Habitat Fencing and Protection

A. The City-contracted biological monitor (funded by the Applicant/Permittee) shall identify sensitive biological resources to be avoided. Prior to construction mobilization, the Applicant/Permittee must install temporary construction fencing and signage (as appropriate) around the ESHA within 100 feet of development under the direction of the biological monitor to avoid impacts to the sensitive habitat throughout the duration of construction. The fencing shall

serve as a visual boundary for construction personnel. In addition, a survey shall be conducted out to property corners and verification shall be submitted to the Planning and Environmental Review Director confirming that the fence has been placed in the correct location prior to the issuance of any grading or building permits, whichever occurs first.

B. At the conclusion of project construction, a post-construction biological survey shall be conducted by the City-approved biologist within seven days of project completion, to document if any inadvertent impacts to ESHA have occurred. If work occurred outside the development area and ESHA is inadvertently removed or damaged, a Habitat Mitigation Plan shall be prepared by the City approved biologist consistent with the General Plan Conservation Element and shall specify acres impacted and restored, timing, plant palette, and monitoring. The Habitat Mitigation Plan shall require a replacement ratio of 1:1 for temporary impacts and a minimum of a 3:1 ratio for permanent impacts and shall require the establishment of native percent cover that reflects that of an unimpacted adjacent ESHA reference site. If required, the Habitat Mitigation Plan shall be approved by the Planning and Environmental Review Director, or designee within 30 days of any inadvertent damage.

Plan Requirements and Timing: Temporary fencing shall be erected prior to construction and removed upon project completion. Project completion reports shall be submitted to the Planning and Environmental Review Director, or designee, within 30 days of project completion. If required, a Habitat Mitigation Plan shall be prepared by a City approved biologist and approved by the Planning and Environmental Review Director, or designee within 30 days of any inadvertent damage.

Monitoring: The biological monitor shall ensure fencing is in place and ensure sensitive habitat avoidance for the duration of construction in the affected area. Planning and Environmental Review Director, or designee, staff shall verify compliance prior to construction and shall verify compliance in the field during all construction activities.

Significance After Mitigation

Impacts to waters/wetlands outside the development area would be less the significant with implementation of Mitigation Measure BIO-5 requiring construction monitoring with 100 feet of ESHA and Mitigation Measure BIO-8 requiring construction ESHA protection and reporting. Impacts from the introduction of invasive species would be less than significant with adherence to Mitigation Measures BIO-6 and BIO-7 prohibiting invasive and exotic species Temporary impacts from the cofferdam would be less than significant with adherence to Mitigation Measure BIO-3.

Threshold 4:	CEQA Guidelines: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? County: Substantially limit or fragment range and movement (geographic distribution of animals and/or seed dispersal routes). Wetlands. Projects which result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or would threaten the continuity of wetland-dependent animal or plant species are considered to have a potentially significant effect on the environment. Projects which substantially interrupt wildlife access, use and dispersal in wetland areas would typically be considered to have a potentially significant impact. Projects which disrupt the hydrology of wetlands systems would be considered to have a potentially significant impact.

Impact BIO-7 CONSTRUCTION NOISE COULD AFFECT AVIAN BEHAVIOR IN OLD SAN JOSE CREEK AND AQUATIC SPECIES MOVEMENT SAN JOSE CREEK. THE USE OF CHEMICALS DURING PROJECT OPERATIONS COULD HARM WILDLIFE AND DEGRADE AQUATIC HABITAT. DIRECT AND INDIRECT OPERATION AND CONSTRUCTION IMPACTS ON WILDLIFE MOVEMENT CORRIDORS WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*

Wildlife movement corridors could be indirectly impacted during construction and operation through the introduction of noise, light, and increased human presence. Increased human activity could affect essential behavioral activities and physiology of wildlife.

The San Jose Creek channel, including the location of the proposed drainage outfall, serves as a movement corridor for aquatic species. Aquatic and upland wildlife species in San Jose Creek could be directly (at the location of the proposed outfall) and indirectly impacted during operation and construction. The upland SBCFCD easement and road serves as a migration corridor for terrestrial, avian, and potentially semi-aquatic species. Outside the project site, beginning 170 feet west of the development area, Old San Jose Creek is mapped as a wildlife migration corridor for terrestrial and avian species.

Construction Impacts

Construction noise may affect essential behavioral activities of wildlife in several ways: (1) nest/roost abandonment; (2) interference with behavior; (3) permanent injury to the auditory system; and (4) masking of important sounds or sound components. As discussed in Section 4.11, *Noise*, construction noise at the northern property boundary would exceed 75 decibels 400 feet to the north (1150 S Fairview Ave) and 66 decibels 685 feet southeast of the development area (Rancho Goleta Community). Short-term construction and long-term operational noise could affect all special status animal species mentioned above, along with migratory and resident wildlife. Animal species differ greatly in their response to noise of various characteristics and duration. Individual animal response to a given noise event or series of events also can vary widely, due to a variety of factors, including time of day and year, physical condition of the animal, physical environment (such as whether the animal is restrained or unrestrained), the experience of the individual animal, and whether or not other physical stressors (e.g., drought) are present (Manci et al. 1988). Because wildlife are relatively mobile and the project impact area is small, most wildlife would simply move out of the vicinity during the construction and operation of the project (with the exception of breeding or nesting animals). Generally, sound levels above approximately 90 decibels are likely to be adverse to mammals and are

associated with a number of behaviors such as retreat from the sound source, freezing, or a strong startle response (Manci, et al, 1988). Noise levels above 75 decibels are known to be capable of producing adverse physiological effects in wildlife (Fletcher 1971). For behavior and physiological impacts, Caltrans recommends applying thresholds that would cause discomfort in humans (Caltrans 2007), which is the City of Goleta is 65 decibels. Short-term noise construction impacts to San Jose Creek wildlife movement would be less than significant with the sound barrier at San Jose Creek required under of Section 4.11, *Noise*, Mitigation Measures NOI-1.

The Old San Jose Creek corridor is 300 feet from the structure in the development area and 40 feet from the utility trenching and would be subject to at least 75 decibels[5] of construction noise. Terrestrial wildlife migration is most pronounced during dusk, nighttime, and dawn, Construction would adhere to typical working hours and noise would not affect terrestrial nocturnal mammal wildlife movement.

For masking impacts, USFWS and Caltrans have informally used 60 decibels as a practical threshold to measure the masking effects on certain species of birds (CDFW 2009, Caltrans 2007). Birds rely on auditory signals in the form of songs, alarms, and scolding calls, to establish and defend territories, attract a mate, feed and care for young at the nest, and to locate and evade potential predators. Increased ambient noise levels may hinder (mask) the ability of the species to cue in on these signals. Birds are most socially active in the two or three hours after dawn, when construction would be occurring. Construction noise would be 67.6 decibels within 300 feet of project construction (Appendix K, page 56), exceeding the 60 decibel avian masking threshold in a portion of Old San Jose Creek. However, the existing ambient noise level is 66 decibels at Old San Jose Creek (Figure 4.11-1) and resident species present in the area are likely acclimated to noise. The addition of less than two decibels during construction would not result in a significant impact to Old San Jose Creek avian habitat within 300 feet of project construction. Outside the breeding season, the initial increase in construction noise would cause bird species to permanently relocate to adjacent habitat, where they would not be affected by proposed project noise. Impacts to bird species during the breeding season would be less than significant with adherence to Mitigation Measure BIO-1.

Operational Impacts

The development and use of 102 parking spaces and the industrial building would generate pollutants that could runoff into San Jose Creek and further degrade water quality and create other human-related stressors such as trash. Trash and other non-toxic debris associated with construction activities can degrade vegetation communities and wildlife habitat and can attract nuisance and pest species. Erosion and chemical and toxic compound pollution (fuel, oil, lubricants, paints, release agents, and other construction materials) may also affect upland vegetation communities, wildlife habitats, and wildlife species. As discussed above under Impact BIO-2 construction and operational erosion, sedimentation, and pollution runoff impacts to San Jose Creek aquatic habitat would be less than significant with adherence to existing stormwater regulations which includes implementation of construction BMPs.

As discussed under Section 4.11, *Noise*, Table 4.11-16, operational off-site noise would not exceed the City's 65-decibel noise standard, which is below the existing ambient noise of 63 decibels at the

[5] Based on a 400-foot distance to 908 South Kellogg Avenue under Section 4.11 Table 4.11-7 and this distance under Table 4.11-11

edge of Old San Jose Creek[6]. Impacts to wildlife movement from operational noise would be less than significant.

Permitted uses on the Project site include indoor warehousing and storage, wholesaling and distribution, construction and material storage, or similar purposes. An estimated 75 employees would occupy the development area daily. The proposed industrial building and new on-site uses would not be located in a wildlife corridor since it is greater than 100 feet from San Jose Creek and directly south of existing industrial uses and development (e.g., Security Paving). The native trees, tall and short shrubs, and ground cover proposed in the detention basin could provide a varied habitat for birds and small mammals and provide a buffer between the new uses and San Jose Creek channel (Tierney Consulting 2018). During project operation, impacts to San Jose Creek and Old San Jose Creek wildlife movement from the introduction of the new uses and human presence would be less than significant.

Lighting may affect essential behavioral activities, physiology, population ecology, and ecosystems of both diurnal and nocturnal wildlife. Policy CE 1.9.e requires that "light and glare will be controlled and directed away from wildlife habitat" and that "exterior night lighting shall be minimized, restricted to low intensity fixtures, shielded, and directed away from ESHAs". Operational impacts to San Jose Creek and Old San Jose Creek could result from the introduction of night lighting in the SPA. The proposed lighting includes a combination of exterior building-mounted wall packs and pole-mounted fixtures in the proposed parking lot and would include semi- and fully cut-off light fixtures. Lighting must be designed in accordance with the Federal Air Administration standards, the City of Goleta Zoning Code (§ 35-139), and General Plan Policy VH 1.4: *Protection of Mountain and Foothill Views*. The Lighting Plan specifies that lighting will be directed downward, fully shielded, and fully cut off. the Lighting Plan limits light at the property lines to less than 0.1 foot-candles and directs light away from ESHA. Additionally, the project applicant has prepared a photometric plan that demonstrates project lighting would be contained on the project site and would not spill onto adjacent properties. Given the design requirements, lighting impacts from new permanent lighting would be less than significant.

There is a potential for direct and indirect adverse effects on wildlife and habitat from the use of pesticides (including rodenticides), herbicides, and fertilizers, particularly on invertebrates and aquatic species. These chemicals can affect stream and wetland function by accidental spraying of ditches and waterways, runoff from sprayed fields, and careless container disposal. Pesticide use has the potential for secondary poisoning of non-target species. Animals like hawks, owls, squirrels, skunks, deer, coyotes, foxes, mountain lions, and bobcats can be killed by pesticides and rodenticides even though they are not the target. These non-target animals can be exposed directly, by eating bait products left out for pest species or chemicals not properly stored, or indirectly by eating prey that has pesticide in its body tissues. These chemicals not only can kill wild animals, but also disrupt hormones affecting behavior and the ability to reproduce. Additionally, although most pesticides break-down quickly, some break-down slowly and persist in the environment and can build up in the bodies of animals, including humans (University of Arizona Cooperative Extension 2009). Indirect operational impacts to wildlife and habitat from the use of pesticides, rodenticides, herbicides, and fertilizers is a potentially significant impact and mitigation is required.

[6] As discussed under Section 4.11, *Noise*, the existing 24-hour noise level at the edge of the Old San Jose Creek riparian corridor is 63 decibels, and at the entrance to the project site is 61 decibels from State Route 217, operational noise from the industrial and commercial uses to the west and to the north, and aircraft noise.

Mitigation Measures

Mitigation Measures BIO-1, BIO-6, and BIO-7, presented previously, and Mitigation Measure NOI-1, described in Section 4.11, *Noise*, are required. In addition, the following measure is required.

BIO-9 Landscape Chemical and Pest Management Plan

Prior to issuance of a Zoning Clearance for the building construction, the Applicant/Permittee shall submit a Landscape Chemical and Pest Management Plan to the Planning and Environmental Review, or designee, for review and approval. The Landscape Chemical and Pest Management Plan shall specify a prohibition of the use of pesticides, herbicides, fertilizers, and rodenticides unless approved by the Planning and Environmental Review Director (e.g., organic pesticides in emergency circumstances). All pesticides, herbicides, fertilizers, and rodenticides used at the project site shall be those designated for use near aquatic and wetland habitats and are prohibited within 100 feet of San Jose and Old San Jose Creeks. Chemicals shall be applied with techniques that avoid over-spraying and control application to avoid excessive concentrations. Integrated Pest Management principles shall be implemented to the extent practicable for chemical pesticides, herbicides, and fertilizers. The Landscape Chemical and Pest Management Plan shall include measures alternative weed control measures (e.g., removal by hand), pest management and extermination; proper application techniques; identify the fertilizers, rodenticides, pesticides, or herbicides proposed to be used; location and storage requirements; and map area used. The use of second-generation anticoagulant rodenticides shall be prohibited during construction and for the life of the permit. Any use of fertilizers, pesticide, herbicide, or rodenticide products shall be consistent with federal and state requirements. Trash and recycling receptacles shall be wildlife proof.

Plan Requirements and Timing: A Landscape Chemical and Pest Management Plan shall be developed by the Applicant/Permittee and approved by the Planning and Environmental Review Director, or designee, prior issuance of Zoning Clearance for the building permit. The requirements shall be printed on the final approved landscape plans, each lease document, and recorded on the property deed. The Landscape Chemical and Pest Management Plan shall provide a prohibition on use of pesticides, herbicides, fertilizers, and rodenticides unless approved by the Planning and Environmental Review Director (e.g., organic pesticides in emergency circumstances). These prohibitions shall be the subject of at least one annual communication by the Applicant/Permittee to the tenants and management company in the form of a meeting and/or newsletter or electronic update that is distributed to tenants.

Monitoring: Planning and Environmental Review Director, or designee, shall review and approve the Landscape Chemical and Pest Management Plan prior to the issuance of the Zoning Clearance. The Applicant/Permittee is responsible for the ongoing use of said plan and shall also provide the Planning and Environmental Review Director with an annual monitoring report by January 1 of each year after issuance of the certificate of occupancy demonstrating the use of aquatic and wetland habitat appropriate fertilizer, herbicides, and pesticides consistent with the Landscape Chemical and Pest Management Plan on the property for the life of the on-site development. All costs associated with the development of the Landscape Chemical and Pest Management Plan, City review, and ongoing implementation including any peer reviews determine necessary by the City are borne by the Applicant/Permittee.

Significance After Mitigation

Indirect impacts to wildlife movement from construction would be less than significant through adherence to Santa Barbara County Air Pollution Control District dust regulations, proposed lighting, and nesting bird surveys required under Mitigation Measure BIO-1 and use of a sound barrier at the edge of San Jose Creek required under Mitigation Measure NOI-1. Indirect operational impacts to habitat would be less than significant through Mitigation Measures BIO-6 and BIO-7 prohibiting use of invasive species. With the implementation of Mitigation Measure BIO-9 requiring a chemical management plan, and adherence to existing stormwater regulations, operational impacts to wildlife migration would be less than significant. Impacts from nuisance species attracted to trash would be less than significant through implementation Mitigation Measure BIO-9 requiring covered trash receptacles.

Threshold 5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact BIO-8 Operation and construction of the project would be inconsistent with the General Plan Policy CE 2.2 requiring a 100-foot buffer from the San Jose Creek Streamside Protection Area and would preclude restoration under Policy CE 2.6. This impact would be Class I, *significant and unavoidable*

Policy CE 2, *Protection of Creeks and Riparian Areas*, is detailed under Section 4.3.2.c. Although Chapter 35 of the zoning code does not include specific development standards related to the SPA setbacks, General Plan Conservation Element Policy CE 2-2, *Stream Protection Areas* requires a 100-foot setback in San Jose Creek and portions of Old San Jose Creek which is still applicable to the proposed project. Refer to Impact BIO-9 for a discussion of the Old San Jose Creek SPA. Under Policy CE 2.2, the buffer is taken from the greater of the current topographic top bank or extent riparian vegetation. The Policy CE 2 required 100-foot SPA buffer based on site-specific mapping is depicted in Figure 4.3-1 and Figure 4.3-2.

Policy CE 2-2 specifies that the City of Goleta can approve a reduction in the setback (to no less than 25 feet) based on a site-specific assessment if: 1) there is no feasible alternative siting for development that will avoid the SPA upland buffer, and 2) the project's impacts will not have significant adverse effects on streamside vegetation or the biotic quality of the stream.

This section addresses Policy CE 2-2.a. (2) related to adverse effects on streamside vegetation or the biotic quality. A discussion of the project's consistency with Policy CE 2-2.a. (1) related to feasible alternative siting to avoid the SPA upland buffer is included under Section 4.10, *Land Use and Planning*. The placement of fill and development and use of the asphalt parking lot would adversely affect biotic quality of the San Jose Creek SPA.

The project does not fully satisfy the 100-foot buffer requirement from San Jose Creek. Development proposed in the 1.68-acre San Jose Creek 100-foot SPA buffer includes the detention basin and drainage outfall, utilities, access, landscaping, parking, retaining walls, the placement of fill, and a construction noise barrier required under Mitigation Measure NOI-1. The proposed new development would maintain a minimum 25-foot buffer from San Jose Creek, with the exception of the drainage outfall discussed in detail under Impact BIO-2. As summarized under Table 4.3-6, the construction of utilities, maintenance of existing drainage improvements, access maintenance, and fencing (walls) are allowed uses in the SPA and are not discussed further.

Table 4.3-6 Uses and Development Proposed in the San Jose Creek SPA

Project Development/Use	Allowed Use Under Policy CE 2?	Significant Adverse Effects Streamside Vegetation or Biotic Quality?
New asphalt parking (including lighting and landscaping) Placement of fill	Policy CE 2 does not include private parking and grading as an allowable use or activity. Approval of SPA buffer reduction would need to be granted to allow for the development and use of the parking lot (and associated landscaping and lighting) and the placement of 4 to 6 feet of fill in the SPA buffer.	Less than significant impacts to streamside vegetation. Adverse (significant) impacts to the SPA wildlife biotic quality.
Utility Construction	Construction of utilities is allowed, providing it is the least damaging alternative, under subsection Policy CE 2.3.d and Policy CE 1.6.d. Utilities would be entirely underground and collocated in an existing disturbed area. Refer to Section 6 for a discussion of alternatives.	Less than significant impacts as a result of underground utilities with adherence to existing regulations and Mitigation Measures BIO-1, BIO-2, BIO-4 though BIO-9.
Existing access	Policy CE 2.3.c allows maintenance of roads and driveways. The access road and proposed is in the same footprint as the existing access driveway and would require minimal grading.	Less than significant impacts with adherence to existing regulations and mitigation measures.
Construction noise barrier and northern retaining wall	Policy CE 2.3 b. allows fencing and other access barriers along property and SPA. The construction noise barrier would be temporary during construction.	Impacts are less than significant (adverse) with adherence to existing regulations and mitigation measures. The noise barrier would shield aquatic wildlife during construction.
Drainage improvement: detention basin drainage outfall replacement and abandonment	Policy CE 2.3.c allows maintenance of existing drainage improvements. Construction of utilities is an allowed use under Policy CE 2.3.d and Policy CE 1.6.d., providing it is the least damaging alternative. Refer to Section 6 for a discussion of alternatives.	Exclusive of proposed development impacts, detention basin and drainage outfall construction and operation would be less than significant with adherence to existing regulations and Mitigation Measures BIO-1 through BIO-9.

POLICIES CE 2.2 AND 2.6 EFFECTS ON STREAMSIDE VEGETATION OR BIOTIC QUALITY AND RESTORATION

The existing development on the project site 25 feet west of the channelized creek top-of-bank includes the 20-foot SBCFCD dirt road and easement, concrete creek access ramp, ice plant, ruderal vegetation, and chain link and wooden fencing at the 25-foot boundary. From 25 to 100 feet existing development on the project site includes the asphalt access driveway, the movie screen with laurel sumac shrubs, fallow landscape, and deteriorating asphalt formerly used as vehicle parking for the drive-in movie theater. Given the lack of creek channel streamside vegetation and project site buffer vegetation, impacts to streamside vegetation would be less than significant.

As discussed above under Section 4.3.1, the biotic quality and function of the San Jose Creek SPA on the project site and in the development area is impaired by altered hydrology, existing compaction and disturbance, State Route 217, and the concrete creek channel. The function and value of the San Jose Creek for regional terrestrial and semi-aquatic wildlife movement is compromised due to a lack of vegetation. However, the channelized creek provides aquatic habitat and the area within the 100-foot buffer may be used by foraging avian and other mobile species. Wildlife, such as birds and raptors, are sensitive to disturbance and would not be able to use the stream area as effectively if new development and uses are sited within the buffer. As discussed under Impact BIO-9, introducing the proposed use and new development would generate pollutants and other human-related stressors such as trash. Wildlife from the stream could become exposed to these materials if they

make their way into the stream or if wildlife were to wander onto the project site. A SPA buffer reduction to 25 feet for the placement of fill and development and use of the parking would substantially increase existing adverse edge effects. Construction and operational impacts on the biotic quality of the SPA from a buffer reduction to 25 feet would be potentially significant (adverse).

New development and uses not otherwise allowed in the SPA buffer would eliminate the potential for preservation in a natural state envisioned under Policy CE 2.2[7] and restoration directed under Policy CE 2.6[8]. Restoration in San Jose Creek and a 25-foot buffer is inconsistent with ongoing flood management, including dredged soil stockpiling in the upland SBFCD easement. However, without the proposed new development, the area between 25 and 100 feet from San Jose could be enhanced as envisioned under Policy CE 2.2 and directed under Policy CE 2.6. The impact from reducing the San Jose Creek SPA buffer to accommodate parking and fill conflict with Policy CE 2 restoration directives and would be potentially significant.

Mitigation Measures

No feasible mitigation measures are available that would reduce the impact from development inconsistent with Policy CE 2.2 and Policy CE 2.6 to a less than significant level.

Significance After Mitigation

The impact from inconsistency with Policies CE 2.2 and CE 2.6 to accommodate parking and placement of fill in the San Jose Creek SPA buffer would be significant and unavoidable.

Impact BIO-9 THE OPERATION AND CONSTRUCTION OF THE PROJECT WOULD BE CONSISTENT WITH THE GENERAL PLAN CONSERVATION ELEMENT POLICIES 2 (OLD SAN JOSE CREEK STREAMSIDE PROTECTION AREA), 3, 5, 6, AND 8. THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*

The text of the General Plan CE policies are detailed under Section 4.3.2.c.

Policy CE 2 Old San Jose Creek SPA

The 393-square-foot projector building to be demolished is partially within the 100-foot Old San Jose Creek SPA. While demolition is not listed as an allowed use, it would not require a permanent SPA adjustment, since new development or uses are not proposed. The structure removal would be a one-time action included under the grading and vegetation removal Conditional Use Permit. The removal of a projection booth would remove development in the SPA and is consistent with the intent of Policy CE 2.6 of restoring function to the SPA. Temporary impacts from the presence of demolition equipment would not have significant adverse effects on streamside vegetation or the biotic quality of the stream with adherence to the SWPPP. Temporary encroachment into the 100-foot Old San Jose Creek SPA buffer for the removal of derelict structures is consistent with Policy CE 2. The removal of a building partially in a SPA does not require a buffer reduction and is consistent with Policy CE 2.

[7] "The purpose of the designation shall be to preserve the SPA in a natural state in order to protect the associated riparian habitats and ecosystems."
[8] "Restoration of native riparian vegetation and removal of exotic plant species shall be implemented, unless such plants provide critical habitat for monarch butterflies, raptors, or other protected animals."

Policy CE 3 Old San Jose Creek Wetland ESHA

Trenching for underground utilities from an existing power pole is proposed in degraded asphalt beginning 40 feet north of a small stand of Pickleweed mats at the terminus of Old San Jose Creek. No activity or "fill" is proposed in the wetland. Policy CE 3.4 requires a buffer of between 50 to 100 feet. However, burying collocated utility cables is considered an "incidental public service" under Policy CE 3.4 and is allowed under Policy CE 1.6 provided there are no feasible, less environmentally damaging alternatives. Mitigation Measures BIO-1, BIO-2, and BIO-4 through BIO-9 would minimize indirect impacts to the Old San Jose Creek wetland. Temporary trenching for utility undergrounding is consistent with Policy CE 3; additional measures or buffers are not required.

Policy CE 5

As discussed under Section 4.3.1 the upland scrub communities in the project site do not qualify as ESHA. Indirect impacts to off-site upland ESHA in the adjacent Security Paving restoration would be addressed through adherence to Santa Barbara County Air Pollution Control District dust rules, existing stormwater regulations, and Mitigation Measure BIO-9.

Policy CE 6

As discussed under Impact BIO-6 the drainage outfall is proposed above the mean high tide line of San Jose Creek, but the workspace is within the SMCA MPA. As discussed under Impact BIO-5 no mechanized equipment would be staged in the MPA. Temporary work within the MPA is in the concrete channel and banks would not affect vegetation. With adherence to Mitigation Measures BIO-1 through BIO-9 and as permitted by CDFW temporary impacts to the SMCA MPA would be less than significant.

Policy CE 8

As discussed under Section 4.3.1.b in the context of General Plan Policy 8.4, no historical raptor nests have been identified or recorded in the project vicinity, and no nests were identified during surveys of adjacent woodland habitat at the appropriate time of year. Direct and indirect impacts to nesting raptors (if present) in the study area would be avoided though adherence to Mitigation Measure BIO-1.

Mitigation Measures

Refer to Mitigation Measures BIO-1 through BIO-9. No additional mitigation measures are required.

Significance After Mitigation

Impact related to conflict with General Plan Policy CE 2 Old San Jose Creek SPA, Policy CE 3 Old San Jose Creek Wetland Buffer, Policy CE 5, Policy CE 6, and Policy CE 8 would be less than significant with adherence to existing regulations and Mitigation Measures BIO-1 through BIO-9.

Threshold 6:	Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact BIO-10 THE PROJECT IS NOT WITHIN AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN. NO IMPACT WOULD OCCUR.

The project is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. Therefore, the project would have no impact related to conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan.

Mitigation Measures

No mitigation measures are required.

4.3.4 Cumulative Impacts

Regional cumulative impacts consider citywide impacts that would occur from impacts of reasonably anticipated projects identified in Table 3-1 of Section 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this EIR is discussed in Section 3, *Environmental Setting*.

Proposed Development and Uses

Previous unpermitted work carried out at the Willow Industrial Park site resulted in the unpermitted storage of crushed asphalt within the SPA buffer area. The Willow Industrial Park project would remove this asphalt and revegetate the SPA buffer area appropriately. No cumulative projects would result in reductions in the SPA buffer area. When combined with past, present, and reasonably foreseeable construction projects in the area, the proposed project would not result in a cumulatively considerable SPA impact given the temporary work for Willow Industrial Park would abate zoning violations and would not reduce the SPA buffer area.

The development of adjacent projects when considered with the redevelopment of the development area, would not be cumulatively significant with adherence to project-specific mitigation measures and permits. Proposed residential, commercial, and industrial development north of the study area within the same watershed in the urban core of Goleta is not anticipated to result in a cumulative impact with adherence to existing stormwater and zoning regulations. The mitigation measures required for this proposed project, along with BMPs and the minimization and mitigation measures required for the nearby projects, would reduce cumulative impacts.

Construction: San Jose Creek Infrastructure Projects

In addition to the ongoing SBCFCD dredging operations conducted annually, the following projects are slated for construction within the San Jose Creek channel or in the City SPA:

- **Caltrans San Jose Creek Bridge Replacement**. Located approximately 1,500 feet to the southwest of the project site and will be under construction from July 2023 through summer 2025.
- **Caltrans San Jose Creek Hollister Avenue Bridge Relocation.** Located 0.75 mile north of the project site and will be under construction from July 2023 through June 2025.

- **The San Jose Creek Multipurpose Path.** Proposed 30 feet east of the drainage outfall on the east bank of San Jose Creek. Anticipated to be under construction from summer 2024 through summer 2026.
- **San Jose Creek Fish Passage Project.** Replacement of the existing fish weirs and overlaps drainage outfall in San Jose Creek. Anticipated to be under construction in the summer of 2024 or 2025.
- **Ekwill Street and Fowler Road Extension.** Includes three separate projects that will be under construction from 2023 to 2026:
  - Hollister Avenue Intersection Modifications 0.70 miles north of the project site.
  - The Fowler Road Intersection Modification is directly north of the project site.
  - Ekwill Street Intersection Modifications is 0.33 miles north of the project site.

Proposed City of Goleta capital improvement projects and Caltrans bridge replacements adjacent to and in San Jose Creek would not result in cumulatively significant impacts since these activities are allowed in SPA. These projects would not introduce new incompatible uses or development. SBCFCD regulates activities under their encroachment permit process. All projects would be subject to resource management agency permit requirements, such as in-stream during the dry season. Cumulative impacts from overlapping construction projects would be less than significant with adherence to existing regulations and project-specific permits.

The proposed project would not result in significant construction cumulative impacts when combined with past, present, and reasonably foreseeable construction projects in the area. While potential impacts could occur, the mitigation measures required for this proposed project, along with BMPs and the minimization and mitigation measures required for the nearby projects, would reduce individual project impacts.

In addition, each project would be responsible for obtaining applicable permits, which would further reduce potential biological resource impacts. Therefore, the impacts of the proposed project would not have the potential to combine with impacts from past, present, or reasonably foreseeable projects to result in a cumulative impact. Cumulative impacts are considered less than significant with the implementation of mitigation measures.

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4.4 Cultural Resources

The background information and analysis in this section is partially based on the *Archaeological Resources Assessment* prepared for the project by Amec Foster Wheeler Environment & Infrastructure, Inc. in December 2017, a memorandum prepared by Dudek in September 2022, which confirmed project site conditions have not changed since the 2017 study was prepared (Appendix E-1), and the *Historic Resources Technical Report* prepared for the project by Dudek in March 2023 (Appendix E-2).

Tribal Cultural Resources are addressed in Section 4.15, *Tribal Cultural Resources*.

4.4.1 Environmental Setting

a. Regional Setting

The Santa Barbara region was historically occupied by the Chumash. The Chumash were a diverse population living in settlements along the California coast from Malibu Creek in the south to Estero Bay in the north, and from Tejon Pass, Lake Casitas and the Cuyama River inland to the islands of San Miguel, Santa Rosa, and Santa Cruz. The ethnography, prehistory, and history of the region are described below.

Ethnography

The Chumash spoke six closely related Chumashan languages, which have been divided into two broad groups—Northern Chumash (consisting only of Obispeño) and Southern Chumash (Purisimeño, Ineseño, Barbareño, Ventureño, and Island Chumash) (Mithun 2001:389). Groups neighboring the Chumash included the Salinan to the north, the Southern Valley Yokuts and Tataviam to the east, and the Gabrielino (Tongva) to the south.

Permanent Chumash villages included hemispherical dwellings arranged in close groups. Each Chumash village had a formal cemetery marked by tall painted poles, often with a defined entrance area (Gamble et al. 2001). Archaeological studies have identified separate sections for elite and common families within the cemetery grounds (King 1969).

The acorn was a dietary staple for the mainland Chumash, though its dominance varied by coastal or inland location. Chumash diet also included cattail roots, fruits and pads from cactus, and bulbs and tubers of plants such as amole (Miller 1988). On the coast, the wooden plank canoe (*tomol*) was employed in the pursuit of marine mammals and fish. The *tomol* not only facilitated marine resource procurement but also facilitated an active trade network maintained by frequent crossings between the mainland and the Channel Islands.

Chumash populations were decimated by the effects of European colonization and missionization. Traditional lifeways largely gave way to laborer jobs on ranches and farms in the Mexican and early American periods. At the time of first European contact in 1542, the Goleta area was occupied by a Native American group speaking a distinct dialect of the Chumash language. Historically, this group became known as the Barbareño Chumash (Landberg 1963); the name deriving from the Mission Santa Barbara under whose jurisdiction many local Chumash came after its founding in 1776. Today, the Santa Ynez Band of Chumash Indians is the only federally recognized Chumash tribe, though many people of Chumash descent continue to live throughout their traditional territory.

Prehistory

Prehistoric chronology for southern California is divided into four distinct periods: Early Man Horizon (ca. 10,000 – 6,000 B.C.), Milling Stone Horizon (6,000 – 3,000 B.C.), Intermediate Horizon (3,000 B.C. – A.D. 500), and Late Prehistoric Horizon (A.D. 500 – Historic Contact).

Early Man Horizon (ca. 10,000 – 6,000 B.C.)

The Early Man Horizon was a diverse mixture of hunting and gathering and focused on use of aquatic resources in coastal and inland lakeshore areas (Jones et al. 2002). However, the Early Man Horizon had a greater emphasis on hunting than later horizons. A warm and dry 3,000-year period called the Altithermal began around 6000 B.C. which was likely responsible for the change in human subsistence patterns, including a greater emphasis on plant foods and small game.

Milling Stone Horizon (6,000 – 3,000 B.C.)

The Milling Stone Horizon is "marked by extensive use of milling stones and mullers, a general lack of well[-]made projectile points, and burials with rock cairns" (Wallace 1955). The dominance of these types of artifacts indicates a subsistence strategy focused on collecting plant foods and small animals. A broad range of food resources were consumed including small and large terrestrial mammals, sea mammals, birds, shellfish and other littoral and estuarine species, near-shore fishes, yucca, agave, and seeds and other plant products (Kowta 1969; Reinman 1964).

Chipped stone artifacts associated with Milling Stone Horizon sites are predominantly manufactured from locally available lithic material. Chopping, scraping, and cutting tools along with grinding tools such as manos and metates[1] were common. Scraper-plane tools were likely used to process agave or yucca for food or fiber (Kowta 1969). Milling stones (such as manos and metates) were used to grind hard seeds into flour. The mortar and pestle, used for pounding acorns or other foods, were first used during the Milling Stone Horizon and their use increased dramatically in later periods (Wallace 1955, 1978; Warren 1968). Sometime during this period, people began making *Olivella* shell beads (beads made from the shell of a small sea snail), which possibly indicates the start of a regional exchange system (Glassow et al. 2007).

Intermediate Horizon (3,000 B.C. – A.D. 500)

The Intermediate Horizon is characterized by a shift toward a hunting and maritime subsistence strategy, as well as greater use of plant foods. During the Intermediate Horizon, there was a noticeable trend toward use of local resources along the coast, including a broad variety of fish, land mammal, and sea mammals. Tool kits for hunting, fishing, and processing food and materials reflect this increased diversity, with flake scrapers, drills, various projectile points, and shell fishhooks being manufactured.

Mortars and pestles became more common during this transitional period, gradually replacing manos and metates as the dominant milling equipment. Many archaeologists believe this change in milling stones signals a change from the processing and consuming of hard seed resources to the increasing reliance on acorns (e.g., Glassow et al. 1988; True 1993). Mortuary practices during the Intermediate Horizon typically included fully flexed burials oriented toward the north or west (Warren 1968).

[1] Manos are handheld stones used when grinding hard seeds on a metate, a flat or slightly hollowed oblong stone on which materials are ground.

Late Prehistoric Horizon (A.D. 500 – Historic Contact)

During the Late Prehistoric Horizon, the diversity of plant food resources and land and sea mammal hunting increased even further than during the Intermediate Horizon. More types of artifacts were observed during this period and high quality, exotic lithic materials were used for small, finely worked projectile points for bow and arrows. Steatite[2] containers were made for cooking and storage and there was an increased use of asphaltum, or naturally occurring tar, for waterproofing. More artistic artifacts were recovered from Late Prehistoric sites and cremation became a common mortuary custom. Larger, more permanent villages supported an increased population size and social structure (Wallace 1955).

After A.D. 500, a wealth of ornaments, ceremonial, and artistic items characterize the Chumash Tradition along the central coast and offshore islands (Warren 1968). Ground stone items include bowls, mortars and pestles, balls, grooved stones, doughnut stones, stone beads, pendants, pipes, tubes, and mammal effigies. Projectile points, both large and small, were typically non-stemmed and leaf-shaped, with convex or concave bases. Chipped stone implements also included drills and scrapers. Utilitarian objects were made from bone (e.g., awls, fishhooks, whistles, and tubes) and shell (e.g., fishhooks and abalone shell dishes). Shell beads and ornaments were abundant, and bowls, pestles, pipes, and stone tubes were inlaid with shell beads and engraved. Bowls, pipes, and ornaments were commonly manufactured from steatite.

Characteristic mortuary practices during the Chumash Tradition included burial in crowded cemeteries. Burials were normally flexed, placed face down, and oriented toward the north or west (Warren 1968). The interments were typically marked by vertical pieces of whalebone and contained abundant grave goods, such as ornaments, effigies, and utensils.

History

A summary of the history of the general project area, excerpted from Appendix E-2, is provided below.

In 1823, during the Rancho period, Daniel Hill was the first American settler to arrive in the Goleta Valley. Hailing from a suburb of Boston, Massachusetts, Hill arrived at Refugio Beach where he met Rafaela, Don Jose Vicente Ortega's daughter and decided to settle in the area. He went on to open Santa Barbara's first trading post. Hill eventually turned to carpentry, soap making, and stone masonry as new business ventures. He built himself a one-story adobe, named the Hill-Carrillo Adobe located at 11 East Carrillo Street in Santa Barbara, and worked towards achieving Mexican citizenship while learning Spanish and converting to Catholicism.

In 1836, Nicholas Den arrived in Santa Barbara from Ireland after experiencing financial hardship in his home country. Upon learning that the Mexican government was giving away land grants to qualified Catholic citizens, he booked passage by boat to California. When he arrived, he befriended Daniel Hill and began trying to assimilate into the local culture, speaking only Spanish and changing the spelling of his name to "Nicolas". In 1841, Den became a naturalized Mexican citizen and applied to the government for a land grant of 15,534 acres consisting of the Rancho Los Dos Pueblos. His request was granted, and he formally took possession of the rancho in December 1842. The original land grant included the entire Goleta Slough area.

In 1845, with the looming annexation of California into the United States, local Friar Duran turned to Den and Hill to take control of the mission lands so that it would stay in the hands of Catholic landowners with a nine-year lease. Hill was also weary of newly arriving American settlers taking

[2] A mineral talc, also known as soapstone.

control of more land in present day Goleta Valley, so he petitioned Governor Pico to grant him the remaining 4,426-acre Ranch La Goleta in 1846. He was successful and for the first time in history, all of the land in the Goleta Valley was privately owned. When California officially became a part of the United States in 1850, Santa Barbara County was created as one of the original counties of the state. The Rancho period came to an end in the area when a major drought from 1863 to 1865 resulted in the death of many cattle. Upon their deaths, both Hill and Den's ranchos were divided into smaller farmsteads. This division shifted the land use from cattle ranching to small crop farming.

Between 1870 and 1890, the population of the Goleta Valley increased from 200 to 700 people. Two small towns, La Patera and La Goleta, were established in the area and provided goods and services to the new residents. Amenities such as the telegraph, telephone, and railroad were slowly brought to the area in the late nineteenth and early twentieth centuries. In the late 1880s, the Southern Pacific Railroad was completed in the area and the first train arrived in Santa Barbara from Los Angeles. After a few months, the railroad tracks were extended north to Goleta. The arrival of the railroad had a major impact on the development of Santa Barbara County, as it led to the construction of several depots, ancillary buildings, and roadways.

As the agricultural industry in Goleta became successful between 1866 and 1918, many resources related to the industry were constructed, such as packing warehouses for walnuts, lima beans, and lemons, acres of large orchards, machine shops, and cooperative offices and sites. While local farmers grew several different crops, walnuts dominated the area.

Between World War I and II, Goleta grew from two small towns into a single booming citrus and oil town. From 1919 to 1940, several more residences were added to the area in the town of La Patera, which would go on to become the commercial center of the new town of Goleta. Residences during this time were commonly constructed as single-family homes in the Craftsman or Spanish Colonial Revival styles. Multi-family residences were more popular after World War II. The area also saw a lot of commercial development with the establishment of Goleta's original commercial districts on Hollister Avenue. The rise in popularity of the automobile resulted in the construction of auto garages and other businesses such as general stores, carpenters, blacksmiths, barbers, restaurants, pool halls, and bakers.

The Great Depression nearly halted development of new construction and agriculture in Goleta. A fungus in the 1930s destroyed Goleta's walnut trees and more land was devoted to lemons. Tomatoes also became a popular crop during this time and these two industries helped keep Goleta afloat during the economic downturn.

In 1941, the citizens of Santa Barbara purchased land in the Goleta Valley to develop a commercial airport occupying the vacant marshland on the Goleta Slough. During World War II, the U.S. Navy leased the airport for a U.S. Marine Corps Air Station which resulted in the construction of many new buildings and residences.

Post-World War II, the population boom and housing shortage did not drastically impact Goleta, which remained a smaller farming community into the 1950s. It was not until the construction of the Cachuma Dam in 1953 that the town began to develop more rapidly, as there was enough water to service a larger population. Aerospace companies such as Raytheon, Aerophysics, and Delco moved to Goleta. The establishment of the University of California at Santa Barbara in 1954 also increased local demand for housing. Between 1956 and 1958, nearly $30 million in construction occurred in the area with 1,000 new homes as well as new stores, industrial buildings, and schools. Most homes constructed during this time were in the Ranch style of architecture and located in planned subdivisions.

Throughout the mid-century, the population experienced steady growth. In 1950, the population was approximately 7,000, which grew to 47,000 by 1966. The City of Goleta was officially incorporated in 2002. Presently, the City's population is approximately 33,000.

b. Project Site Setting

A records search of the California Historical Resources Information System (CHRIS) was conducted in 2017 to identify previously conducted cultural resource studies and previously recorded cultural resources within a 0.25-mile radius of the project site. The results from the CHRIS records search identified one previously conducted cultural resources study within the "southern portion" of the project site. The CHRIS search identified no previously recorded cultural resources in the project site; however, the search identified three precontact archaeological resources and one area of redeposited cultural materials within the 0.25-mile buffer. The locations of cultural resources cannot be shared and are exempt from the California Public Records Act.

A review of historic-era accounts of the Goleta Slough indicated that the current project site was within the tidal zone during the Holocene era. Based on the fact that any cultural materials related to the terminal Pleistocene would be deeply buried during Holocene-era sea level rise and the infilling of sediments within the project site throughout the Holocene period, and especially during the 1860-1861 flooding event, there is no potential for extant cultural deposits to exist within the project site. A subsurface soils investigation concluded that the top 4 feet of soil on the project site consists of modern imported fill, with at least 4 to 24 feet below ground surface representing Holocene-era soil accumulation. The project site would have been at an elevation of 8 feet above sea level (ASL), and the historic records indicate that tidal levels would have extended up to 10 feet ASL. The project site would have been infilled as sea level rose throughout the Holocene (Amec 2017).

A review of existing structures on the project site determined that Twin Screens Drive-In theater is not eligible under the National Register of Historic Places, California Register of Historic Resources, or City designation criteria as a historic resource. There are no eligible historic resources identified on the project site (Appendix E-2).

4.4.2 Regulatory Setting

a. Federal Regulations

National Register of Historic Places

The National Register of Historic Places (NRHP) was established by the National Historic Preservation Act (NHPA) of 1966 as "an authoritative guide to be used by federal, State, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (CFR 36 CFR 60.2). The NRHP recognizes properties that are significant at the national, State, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association.

b. State Regulations

California Environmental Quality Act

Section 15064.5 of the CEQA Guidelines states that a cultural resource is "historically significant" if it meets one of the criteria for listing in the California Register of Historical Resources (CRHR) (Public Resources Code § 5024.1; 14 CCR § 4852). A resource may quality for CRHR listing if it:

Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history.

Criterion B: It is associated with the lives of persons who are significant in our past.

Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.

Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

Cultural resources meeting one or more of these criteria are defined as "historical resources" under CEQA. Included in the definition of historical resources are prehistoric archaeological sites, historic archaeological sites, historic buildings and structures, traditional cultural properties important to a tribe or other ethnic group, cultural districts and landscapes, and a variety of other property types.

Impacts to "unique archaeological resources" are also considered under CEQA as described under Public Resources Code § 21083.2. This section defines a "unique archaeological resource" as:

> "an archaeological artifact, object, or site, about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> 1. Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
> 2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
> 3. Is directly associated with a scientifically recognized important prehistoric or historic event or person (Public Resources Code § 21083.2(g))."

Potential impacts to identified cultural resources need only be considered if the resource is an "important" or "unique archaeological resource" under the provisions of CEQA Guidelines sections 15064.5 and 15126.4 and the eligibility criteria. If a resource cannot be avoided, then the resource must be examined pursuant to CEQA Guidelines sections 15064.5 and 15126.4 and pursuant to the eligibility criteria as an "important" or "unique archaeological resource."

A non-unique archaeological resource is an archaeological artifact, object, or site that does not meet the above criteria. Impacts to non-unique archaeological resources and resources that do not qualify for listing on the CRHR receive no further consideration under CEQA.

Section 15064.5(b)(3) of the CEQA guidelines state that if significant cultural resources are identified within a proposed project site, the lead agency is required to identify potentially feasible mitigation measures and ensure that these measures are enforceable through permit conditions. Preservation in place is the preferred mitigation for archaeological sites, which can be accomplished by capping or covering the site with sterile soil (PRC 21083.2 [b]; CEQA Guidelines § 15126.4[b][3]).

California Register of Historical Resources

The California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21084.1) requires that a lead agency determine whether a project could have a significant effect on historical resources. A historical resource is a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (PRC Section 21084.1), a resource included in a local register of historical resources (PRC Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (PRC Section 15064.5[a][3]).

PRC Section 5024.1 requires an evaluation of potential historical resources to determine their eligibility for listing in the CRHR. The purpose of the register is to maintain listings of the state's historical resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP.

PRC, Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it does one or more of the following:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (CEQA Guidelines, Section 15064.5 [b][1], 2000). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion or eligibility for inclusion in the CRHR (CEQA Guidelines, Section 15064.5[b][2][A]).

California Coastal Act

The project site is located in the City's Coastal Zone. According to PRC Section 30244, "where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required."

Codes Governing Human Remains

The disposition of human remains is governed by California Health and Safety Code Section 7050.5 and PRC Section 5097.98 and falls within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely

descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

c. Local Regulations

Goleta General Plan

The City of Goleta's Open Space Element of the General Plan (2006) outlines several goals and policies related to the preservation of historic and cultural resources. Policies that are relevant to the project include:

- **Policy OS 8.5: Mitigation.** If research and surface reconnaissance shows that the project area contains a resource of cultural significance that would be adversely impacted by proposed development and avoidance is infeasible, mitigation measures sensitive to the cultural beliefs of the affected population shall be required. Reasonable efforts to leave these resources in an undisturbed state through capping or covering resources with a soil layer prior to development shall be required. If data recovery through excavation is the only feasible mitigation, the City shall confer with the affected Native American nation or most-likely descendants, as well as agencies charged with the responsibility of preserving these resources and organizations having a professional or cultural interest, prior to the removal and disposition of any artifacts.

Please see Section 4.10, *Land Use and Planning*, for a comprehensive list of applicable goals and policies.

Goleta Coastal Zoning Ordinance

Section 35-65 of the City's previous Coastal Zoning Ordinance provides archaeological resource development standards for projects. According to Section 35-65, when archaeological or other cultural resources are located on the project site, projects should be designed to avoid impacts to such resources, implement mitigation if impacts are unavoidable, and engage in Native American consultation when projects may impact significant archeological or cultural resources.

Goleta Historic Preservation and Archaeological and Tribal Cultural Ordinance (Ordinance No. 22-05)

This ordinance, passed in April 2022, established regulations and processes associated with historic resources, archaeological resources, and tribal cultural resources. Chapter 17.33 (Historic Resources Preservation) and Chapter 17.43 (Archaeological and Tribal Cultural Resources) of the City's Municipal Code were established by this ordinance, excerpts from Chapter 17.33 and Chapter 17.43 that would potentially apply to the project are provided below.

Chapter 17.33.030 Historic Resources Inventory

a. **Establishment.** The City shall create and maintain a list of properties known as the Historic Resources Inventory (HRI) adopted by City Council Resolution. The HRI shall collectively consist of buildings, structures, objects, or sites that satisfy one or more of the following:
    1. Are identified as potentially eligible for designation through historic resources survey or other evaluation conducted by a qualified preservation professional using accepted professional practices and formally adopted for inclusion on the HRI by the City Council; or

2. Are listed in or formally determined eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, either individually or as a Contributor to a designated Historic District; or
3. Are designated as a County of Santa Barbara Landmark or County of Santa Barbara Place of Historic Merit; or
4. Are designated Historic Landmarks or contributors to designated Historic Districts by the City Council.

b. **Purpose.** The HRI may be used for reference for future determinations for the designation of Historic Landmarks or Historic Districts. In addition, all properties on the HRI are subject to provisions of this chapter including the standards and review processes associated with alterations to or demolition of historic resources. All properties on the HRI are considered historical resources as defined by the California Environmental Quality Act and may be eligible to use alternative Building Code provisions as determined by the Building Official.

Chapter 17.43.040 Development Standards

a. The following standards are applicable to all permits issued under this chapter:
   1. If unanticipated discovery of archaeological and/or tribal cultural resources occurs during earth-disturbing activities, earth-disturbing activities must be stopped immediately until a qualified archaeologist can evaluate the significance of the archaeological and/or tribal cultural resource pursuant to standards set forth in Council Resolution No. 08-40, Environmental Thresholds and Guidelines Manual as amended, and local Chumash tribal representative(s) can evaluate the importance of the find.
   2. If human remains are uncovered as a result of earth-disturbing activities, work must stop immediately and the Planning and Environmental Review Department must be contacted, and the applicant must follow the procedures identified by Public Resources Code Section 5097.98.
   3. As applicable, recommendations identified in the Preliminary Archaeological Assessment, Phase 1 Report, or Extended Phase 1 Report and agreed upon by the City, must be implemented and printed on the approved building plans.

4.4.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

In December 2017, Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec) prepared an *Archaeological Resources Assessment* in support of the proposed project. The study included a cultural resources records search and an environmental setting reconstruction of the project site based on a summary of a geotechnical engineering study prepared by Earth Systems Pacific, Inc. in 2017. In accordance with the City of Goleta's requirement to verify that the project site has not changed in its physical condition since the 2017 *Archaeological Resources Assessment*, in September 2022, Dudek drafted a memorandum that confirmed the on-site conditions of the project site (Appendix E-1). In March 2023, Dudek prepared a Historic Resources Technical Report that evaluated the historic significance of on-site structures (Appendix E-2). The analysis of cultural resources impacts in this section is based on information presented in the prior three cultural resources studies.

Amec 2017 Archaeological Resources Assessment

CULTURAL RESOURCES RECORDS SEARCH

The Central Coast Information Center (CCIC) then located at the University of California, Santa Barbara (recently relocated to the Santa Barbara County Natural History Museum) conducted a search of the CHRIS records on November 21, 2017. The search was undertaken to identify previously conducted cultural resource studies and previously recorded cultural resources (prehistoric or historic) within a 0.25-mile radius of the project site. A 0.5-mile buffer is the industry standard for a CHRIS search, but a 0.25-mile buffer can be used in areas known to have a high resource density as the larger radius is not needed to understand the local archaeological landscape. The CHRIS records search documented no prehistoric or historic archaeological resources within the project site, three prehistoric resources and one area of redeposited cultural materials within the 0.25-mile buffer, and one previous cultural resources study that addressed the southern portion of the project site (Amec 2017).

ENVIRONMENTAL SETTING RECONSTRUCTION

The *Archaeological Resources Assessment* summarized a geotechnical engineering study conducted by Earth Systems Pacific, Inc. in 2017, which consisted of 4, 6-inch-wide, hollow-stem auger borings within the four corners and center of the project site. Based on the borings, the *Archaeological Resources Assessment* concluded that the top 4 feet were modern imported fill, with at least 4 to 24 feet below ground surface representing Holocene-era soil accumulation (Amec 2017).

Dudek 2022 Memorandum

In September 2022, Dudek drafted a memorandum to verify the consistency of project site conditions with the 2017 *Archaeological Resources Assessment*. This memorandum was conducted in compliance with the City of Goleta's requirement that a qualified archaeologist verify that the project site did not change since the 2017 *Archaeological Resources Assessment*. The memorandum reviewed aerial imagery from 2016, 2018, and (then) current aerial images in order to determine whether the project site conditions had changed, and completed a cursory survey of the project site. The memorandum concluded that the project site use remained the same from 2016 to 2022, and that soils noted in the *Archaeological Resources Assessment* matched those observed during the project site survey (Appendix E-1).

Dudek 2023 Historic Resources Technical Report

The *Historic Resources Technical Report* included a field survey, archival research, and historical significance evaluation. Based on the results of this report, the Twin Screens Drive-In theater was not found eligible under all NRHP, CRHR, and City designation criteria due to a lack of significant historical associations, architectural merit, and poor integrity. No historic resources were identified within the project site by the *Historic Resources Technical Report* (Appendix E-2).

Significance Thresholds

The significance of a cultural resource and impacts to the resource is determined by whether that resource can increase the collective knowledge regarding the past. The primary determining factors are site content and degree of preservation. As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*.

Pursuant to the Appendix G of the CEQA Guidelines, potentially significant impacts would occur if development of the project site would:

1. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5;
3. Disturb any human remains, including those interred outside of formal cemeteries.

According to the County's *Environmental Thresholds and Guidelines Manual*, a project would have 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.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact CUL-1 NO HISTORIC RESOURCES WERE IDENTIFIED ON THE PROJECT SITE. THE PROJECT WOULD HAVE NO IMPACT TO HISTORIC RESOURCES.

The *Historic Resources Technical Report* identified one built environment resource over 45 years old that had not been previously evaluated for historical significance: the Twin Screens Drive-In theater. The following analysis summarizes the results of the *Historic Resources Technical Report* (Appendix E-2).

The Twin Screens Drive-In theater was constructed in 1966. Archival research revealed that while the Twin Screens Drive-In theater was still associated with the national trend of drive-in theaters in suburban areas, new construction of drive-ins declined as early as 1960, making the Twin Screens Drive-In theater a late example of the national trend. It was also the last drive-in theater to be constructed in Santa Barbara County. While the Twin Screens Drive-In theater is associated with the historical trend of drive-ins, it does not appear to be an early regional prototype of drive-in theaters.

The Twin-Screens Drive-In theater's original owner was listed as Lippert, Inc., which archival research revealed to be connected to Lippert Theaters, owned by Robert L. Lippert, an American theater chain owner and film producer. While the property was owned and associated with Robert Lippert, his ownership of the drive-in theater does not constitute an important association with his productive life as a film professional. The Twin Screens Drive-In theater was also associated with Raymond Syufy, owner of Syufy Theaters. Syufy opened his first theater in Vallejo, California in 1941, and went on to create a very successful chain of movie theaters with 425 screens. While Syufy Theaters is associated with the Twin Screens Drive-In theater, it is not directly tied to Syufy as a place that illustrates his important achievements.

The Twin Screens Drive-In theater was constructed in 1966 and represents a popular mid-century property type that features modest Googie-style elements in its architectural design. Upon its construction, it had two semi-circular parking areas with mounted speaker stands, two screens, two ticket booths, two projection buildings, and one concession area with restrooms. It had a long entrance driveway with pole-mounted marquee sign, and a fence surrounding the site. Presently, the theater is in poor condition and has lost some of the original character defining features. For instance,

it no longer has one of its two screens, and the speaker stands have been removed or are in ruins. The ticket booths, projection buildings, and concession building have lost several architectural features due to neglect over time, including windows and doors.

The most intact building on the property is the concessions stand, which features Googie-style elements such as being single-story, an organic shape with an expressive round roofline, and diamond shaped pillars as a thematic design detail. When compared to other examples of the property type from the same period, it does not serve as a good representation of the style, lacking many of the character-defining features such as a clear expression of materials, large expanses of plate glass, and signage designed to catch the eyes of automobile drivers.

While the theater was designed by Vincent Raney in 1965 and 1966, it is not a good representation of his larger body of work. His most prolific designs were dome topped indoor movie theaters with signature curved screens. For example, the Solano 2 Drive-In in Concord, California has a similar overall form to the Twin Screens Drive-In theater, but has better integrity of design, materials, and workmanship and includes more original design features such as decorative arches.

Finally, the project site is not significant as a source, or likely source, of important historical information nor does it appear likely to yield important information about historic construction methods, materials, or technologies.

In conclusion, the Twin Screens Drive-In theater retains integrity of location, but lacks integrity of design, setting, materials, workmanship, feeling, and association. Due to a lack of important historical associations, a lack of architectural merit, compromised integrity, and an inability to serve as a good representation of the original architect's body of work, the Twin Screens Drive-In theater was found ineligible for historic resource listing. Therefore, the project would have no impact with respect to historic resources pursuant to Section 15064.5.

Mitigation Measures

No mitigation measures are required.

Threshold 2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact CUL-2 CONSTRUCTION OF THE PROJECT WOULD INVOLVE GROUND DISTURBING ACTIVITIES SUCH AS GRADING AND SURFACE EXCAVATION. HOWEVER, THERE IS NO POTENTIAL FOR ARCHAEOLOGICAL CULTURAL RESOURCES TO EXIST WITHIN THE PROJECT SITE. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

As discussed above, the CHRIS cultural resources search results indicate no archaeological resources have been recorded within the project site. Furthermore, the environmental setting reconstruction conducted for the 2017 *Archaeological Resources Assessment* concluded that given the site's history during the Holocene Era and its accumulation of fill, there is no potential for archaeological cultural resources to exist within the project site. Considering no archaeological resources are known to exist within the project site, and there is no potential for undiscovered archaeological resources to exist within the project site, the project would not substantially affect archaeological resources, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3:	Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impact CUL-3 CONSTRUCTION OF THE PROJECT WOULD INVOLVE GROUND DISTURBING ACTIVITIES SUCH AS GRADING AND SURFACE EXCAVATION, WHICH HAVE THE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED HUMAN REMAINS. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

No known human remains or prehistoric villages where human remains and/or cemeteries are known to exist occur within the project site. As stated in the 2017 *Archaeological Resources Assessment*, there is a very low likelihood that prehistoric habitation occurred at the project site, as settlements were found at higher elevations along the Goleta Slough. The project site is primarily underlain by fill soils that reach approximately 4 feet in depth (Appendix G). As indicated by cross-sections of grading plans for the project, project construction would result in the excavation of less than 4 feet of fill for all project components, except for the bioretention basin and utility trench construction, which would involve excavation of no more than 5 feet of fill. Therefore, excavation and ground disturbance associated with construction of the proposed industrial building would primarily occur in previously disturbed and fill soils, rather than native soils, which would further reduce the potential for project-related ground-disturbing activities to disturb human remains, should they be present.

In the event of an unanticipated discovery of human remains during construction, the State of California Health and Safety Code Section 7050.5 requires that all construction activities halt in the vicinity of the discovery and the County Coroner be contacted immediately. The County Coroner would make a determination of origin and disposition of the human remains pursuant to Public Resources Code Section 5097.98. If the human remains are determined to be prehistoric, the coroner would notify the NAHC, which would determine and notify a most likely descendant (MLD). The MLD would complete an inspection of the site within 48 hours of being granted access to the site. The MLD would be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the Public Resources Code. Recommendations by the MLD may include: (1) the nondestructive removal and analysis of human remains and items associated with Native American human remains; (2) preservation of Native American human remains and associated items in place; (3) relinquishment of Native American human remains and associated items to the descendants for treatment; or (4) other culturally appropriate treatment.

With compliance with existing regulations prescribed in the State of California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8, impacts to human remains would be less than significant.

Mitigation Measures

No mitigation measures are required.

Mitigation Measures

No mitigation measures are required.

4.4.4 Cumulative Impacts

Cumulative development in the Goleta Valley would continue to disturb areas that may potentially contain cultural resources. All potential development sites in the City are considered sensitive for archaeological resources due to their location adjacent to the Goleta Slough. However, existing City policies and regulations would protect any unknown resources that might be uncovered in the course of project development. Individual development proposals are reviewed separately by the City and undergo environmental review when it is determined that the potential for significant impacts exists, which is occurring for this Project. In the event that future cumulative development would result in impacts to known or unknown cultural resources, impacts to such resources would be addressed on a case-by-case basis. While there is the potential for significant cumulative impacts to cultural resources in the Goleta Valley, the project site has no potential to contain historic or archaeological resources, and would not substantially affect the cultural resource landscape of the Goleta area. The project would not have a cumulatively considerable contribution to cumulative impacts associated with cultural resources.

4.5 Energy

This section discusses the proposed project's potential impacts related to energy. This analysis follows the guidance for evaluation of energy impacts contained in Appendix F and Appendix G of the *CEQA Guidelines*. The physical environmental impacts associated with the generation of electricity and burning of fuels have been accounted for in Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*.

4.5.1 Environmental Setting

Energy use relates directly to environmental quality because energy use can adversely affect air quality and can generate greenhouse gas (GHG) emissions that contribute to climate change. Fossil fuels are burned to create electricity that powers residences, heats and cools buildings, and powers vehicles. Transportation energy use is dependent on the fuel efficiency of cars, trucks, and public transportation; the different travel modes such as auto, carpool, and public transit; and the miles traveled using these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy.

a. Energy Supply

Petroleum

California

California is one of the top producers of petroleum in the nation with drilling operations occurring throughout the state but concentrated primarily in Kern and Los Angeles counties. A network of crude oil pipelines connects production areas to oil refineries in Northern and Southern California. California oil refineries also process Alaskan and foreign crude oil (California Energy Commission [CEC] 2023a). According to the United States Energy Information Administration (USEIA), California oil refineries produced approximately 124.7 million barrels of crude oil in 2021 (USEIA 2023a).

Goleta

There are approximately 13 gas stations, but no petroleum refineries in Goleta (USEIA 2021; GasBuddy 2023). According to the California Department of Conservation, Geologic Energy Management Division (CalGEM), there are several idle and plugged oil and gas production wells, as well as active observation wells and gas storage wells, but no active oil production wells in Goleta (CalGEM 2023a).

Alternative Fuels

A variety of alternative fuels are used to reduce petroleum-based fuel demand. Alternative fuel use is encouraged through various statewide regulations and plans, such as the Low Carbon Fuel Standards and Senate Bill (SB) 32. Alternative vehicle fuels include hydrogen, biodiesel, and electricity. There are no biodiesel or hydrogen fuel stations located in Goleta. There are approximately 89 electric vehicle (EV) charging stations available for public use located in Goleta (PlugShare 2024).

Electricity

California

In 2022, California's in-state electricity generation totaled 203,257 gigawatt-hours (GWh) (CEC 2023b). Primary fuel sources for the state's electricity generation in 2021 included natural gas, solar photovoltaic, nuclear, wind, hydroelectric, and geothermal. According to the Final 2022 Integrated Energy Policy Report, California's electricity sector is becoming increasingly reliant on solar, with more than 22,000 GWh of electricity produced by photovoltaic systems in 2021 (CEC 2023c).

Southern California Edison Company

The Southern California Edison Company (SCE) is responsible for providing electric power supply to Goleta. SCE is one of the nation's largest electric and gas utility companies, and maintains 91,375 miles of electric distribution lines and 12,635 miles of interconnected transmission lines (SCE 2023a). Power outages in SCE territory may occur as the result of unexpected events, while SCE also plan scheduled outages for routine maintenance or necessary repairs. California Independent System Operator (CAISO) rotating outages (Stage 3 CAISO Emergencies) become necessary when the state's electricity demand outpaces available supply in real time or are unavoidable. SCE manages and rotates these outages across groups of customers throughout the service territory to protect the integrity of the electric system, while limiting the inconvenience to any one customer or community. Every customer in SCE service territory is assigned to a Rotating Outage Group. Maintenance outages occur for work on the electrical system, necessary to protect public safety, reduce wildfire risk, complete customer-requested efforts, and to maintain and improve reliability on the electric system (SCE 2023b). Goleta has greater vulnerability to outages given the city's location at one end of SCE's territory and the geography through which the transmission lines run. Specifically, the area is at risk of experiencing a prolonged electrical outage should the two transmission lines serving the area experience a simultaneous disruption, which has been a potential threat during wildfires in the region in recent years.

In 2022, SCE's power mix consisted of 33.2 percent renewable resources (biomass, geothermal, small hydroelectric, solar, and wind), 24.7 percent natural gas, 8.3 percent nuclear, 3.4 percent large hydroelectric facilities, and 30.3 percent unspecified power (i.e., electricity that has been purchased through open market transactions and is not traceable to a specific generation source) (SCE 2023c).

Central Coast Community Energy

Central Coast Community Energy (3CE) is a Community Choice Aggregator established by local communities to source clean and renewable electricity for Santa Barbara, San Luis Obispo, Monterey, San Benito, and Santa Cruz counties while retaining the primary utility provider's (i.e., SCE) traditional role delivering power, maintaining electric infrastructure, and billing for electricity. In 2022, 3CE's power mix consisted of 35.8 percent renewable resources, 5.9 percent large hydroelectric facilities, and 58.3 percent unspecified power (3CE 2023a). 3CE serves approximately 94 percent of households and businesses throughout its service region and has an overarching goal of sourcing 100 percent clean energy by 2030 with an intermediate goal of 60 percent renewable energy sourcing by 2025 (3CE 2023b). 3CE also provides incentives for EVs, building electrification, and electrification of agricultural equipment. Since 2021, 3CE has served as the default electricity provider for Goleta.

Goleta

According to the USEIA's U.S. Energy Atlas, there are no solar power plants in Goleta (USEIA 2023b). In recent years, various battery energy storage systems have been proposed and approved for construction in SCE territory including the Goleta Battery Energy Storage Facility which, as of December 2023, is operational (Caraway 2023).

Natural Gas

California

California's net natural gas production for 2020 was 149 billion cubic feet (CalGEM 2023b). California depends on out-of-state imports for nearly 90 percent of its natural gas supply. The CEC estimates approximately 45 percent of natural gas burned in California is used for electricity generation, 21 percent is used in the residential sector, 25 percent is used in the industrial sector, and 9 percent is used in the commercial sector (CEC 2024).

Southern California Gas Company

The project site is within the service area of the Southern California Gas Company (SCG) which spans Central and Southern California (CEC 2021). SCG's service area is equipped with 101,000 miles of gas transmission and distribution pipelines (SCG 2023a). Natural gas supplied by SCG is sourced from California, Southwestern United States, the Rocky Mountains, and Canada (California Gas and Electric Utilities 2023). As part of a commitment to supporting achievement of the state's GHG reduction goals, SCG also provides expertise and assistance to customers who want to convert organic waste material into biogas or renewable natural gas (RNG). RNG can be produced from a variety of existing waste streams and renewable biomass sources, such as: animal waste from dairies; food waste from landfills; organic waste from wastewater treatment plants; and organic waste from landfill diversion facilities. SCG's network of natural gas pipelines allow for RNG to be accepted into their transmission and distribution system and delivered to customers. There are currently no RNG suppliers, active participants, or service providers in the RNG industry located in the City of Goleta. However, SCG provides a packet (the "RNG Toolkit" that offers a wide range of information relating to RNG and interconnecting to SCG pipelines for interested parties (SCG 2023b).

In 2022, SCG customers consumed a total of 5,026 million therms of natural gas. Residential users accounted for approximately 44 percent of SCG's natural gas consumption. Industrial and commercial users accounted for another 32 percent and 19 percent of consumption, respectively. The remainder was used for agriculture, water pumping, mining, and construction activities (CEC 2023d).

Goleta

There are several idle and former oil and gas production wells in Goleta, as well as active observation wells and gas storage wells (CalGEM 2023a). No natural gas processing plants are located in Goleta (USEIA 2023b). SCG's natural gas transmission lines run east to west approximately 0.30-mile south of the project site (SCG 2023c).

b. Energy Demand

The smallest scale at which energy consumption information is readily available is the county level. Therefore, energy consumption in Santa Barbara County is used herein to characterize the city's existing consumption of petroleum, electricity, and natural gas as detailed in the following subsections.

Petroleum

Santa Barbara County consumed an estimated 170 million gallons of gasoline and an estimated 22 million gallons of diesel fuel in 2022, which was approximately 1.2 percent of statewide gasoline consumption and 0.9 percent of statewide diesel fuel consumption (CEC 2023e). Table 4.5-1 provides an overview of 2022 gasoline and diesel consumption in Santa Barbara County and California.

Table 4.5-1 2022 Gasoline and Diesel Consumption

Fuel Type	Santa Barbara County (gallons)	California (gallons)	Proportion of Statewide Consumption[1]
Gasoline	170,000,000	13,640,000,000	1.2
Diesel	22,000,000	2,290,000,000	0.9

[1] For reference, the population of Santa Barbara County (440,557) is approximately 1.1 percent of the population of California (38,940,231).

Source: CEC 2023e; California Department of Finance (DOF) 2023

Electricity

Santa Barbara County consumed an estimated 2,804 GWh of electricity in 2022, which was approximately 3.2 percent of SCE's electricity consumption and approximately 1.0 percent of statewide electricity consumption (CEC 2023f; CEC 2023g). Information regarding 2022 electricity consumption by 3CE customers is not readily available and therefore is not included herein.[1] Table 4.5-2 provides an overview of 2022 electricity consumption in Santa Barbara County, in California, and by SCE customers.

Table 4.5-2 2022 Electricity Consumption

Energy Type	Santa Barbara County (GWh)	SCE (GWh)	California (GWh)	Proportion of SCE Consumption	Proportion of Statewide Consumption[1]
Electricity	2,804	85,870	287,826	3.2	1.0

[1]For reference, the population of Santa Barbara County (440,557) is approximately 1.1 percent of the population of California (38,940,231).

Source: CEC 2023f; CEC 2023g; DOF 2023

Natural Gas

Santa Barbara County consumed approximately 129 million therms of natural gas in 2022, which was approximately 2.5 percent of the natural gas consumed by SCG and approximately 1.1 percent of statewide natural gas consumption (CEC 2023d; CEC 2023h). Table 4.5-3 provides an overview of 2022 natural gas consumption in Santa Barbara County, in California, and by SCG customers.

[1] 3CE forecasts estimated future electricity demand within its service area. 3CE anticipates a total wholesale demand of 6,156 GWh in 2025(3CE 2023c). The 2,804 GWh demand in Santa Barbara County represents approximately 45.5 percent of 3CE's anticipated electricity demand in 2025.

Table 4.5-3 2022 Natural Gas Consumption

Energy Type	Santa Barbara County (millions of Therms)	SCG (millions of Therms)	California (millions of Therms)	Proportion of SCG Consumption	Proportion of Statewide Consumption[1]
Natural Gas	129	5,026	11,711	2.5	1.1

[1] For reference, the population of Santa Barbara County (440,557) is approximately 1.1 percent of the population of California (38,940,231).

Source: CEC 2023d; CEC 2023h; DOF 2023

4.5.2 Regulatory Setting

a. Federal Regulations

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 was designed to improve vehicle fuel economy and help reduce nationwide dependence on foreign oil. It expands the production of renewable fuels, reducing dependence on oil, and confronting global climate change. Specifically, it increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard and reduces U.S. demand for oil by setting a national fuel economy standard of 35 mpg by 2020. The Act also set energy efficiency standards for lighting (specifically light bulbs) and appliances. The proposed project would be required to install photosensors and energy-efficient lighting fixtures consistent with the requirements of 42 United States Code Section 17001 et seq.

Energy Policy and Conservation Act

Enacted in 1975, the Energy Policy and Conservation Act legislation established fuel economy standards for new light-duty vehicles (autos, pickups, vans, and sport-utility vehicles). The law placed responsibility on the National Highway Traffic and Safety Administration (NHTSA), a part of the U.S. Department of Transportation (USDOT), for establishing and regularly updating vehicle standards. The U.S. Environmental Protection Agency (USEPA) administers the Corporate Average Fuel Economy (CAFE) program, which determines vehicle manufacturers' compliance with existing fuel economy standards. Since the inception of the program, the average fuel economy for new light-duty vehicles steadily increased from 13.1 miles per gallon (mpg) for the 1975 model year to 30.7 mpg for the 2014 model year and can increase to 54.5 mpg by 2025.

On August 2, 2018, the NHTSA and USEPA, operating under the direction of the Trump Administration, proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated in two parts as described below.

- Part One, "One National Program" (84 Federal Register 51310) revokes a waiver granted by USEPA to the State of California under Section 209 of the Clean Air Act to enforce more stringent emission standards for motor vehicles than those required by USEPA for the explicit purpose of GHG emission reduction, and indirectly, criteria air pollutants and ozone precursor emission reduction. This revocation became effective on November 26, 2019, potentially restricting the ability of the California Air Resources Board (CARB) to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California.
- Part Two addresses CAFE standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposes new CAFE standards for model years 2022 through 2026 and would amend existing CAFE standards for model year 2021. The proposal would retain the model

year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026. The proposal addressing CAFE standards was jointly developed by NHTSA and USEPA, with USEPA simultaneously proposing tailpipe carbon dioxide standards for the same vehicles covered by the same model years.

The USEPA and NTHSA published final rules to amend and establish national carbon dioxide (CO_2) and fuel economy standards on April 30, 2020 (Part Two of the SAFE Vehicles Rule) (85 Federal Register 24174). On April 22, 2021, the Biden Administration formally proposed to roll back portions of the SAFE Rule, thereby restoring California's right to enforce more stringent fuel efficiency standards. Most recently, on December 21, 2021, the NHTSA finalized rules to repeal the SAFE I Rule. The final rule concludes the SAFE I Rule overstepped the agency's legal authority and established overly broad prohibitions that did not account for a variety of important State and local interests. The final rule ensures the SAFE I Rule will no longer form an improper barrier to states exploring creative solutions to address their local communities' environmental and public health challenges.

Construction Equipment Fuel Efficiency Standard

The USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles were phased in by the end of 2015.

b. State Regulations

California Energy Plan

The CEC, in collaboration with California Public Utilities Commission (CPUC), is responsible for preparing the California Energy Action Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and maintenance of a healthy economy. The 2003 Energy Action Plan calls for the State to assist in transformation of the transportation system to improve air quality, reduce congestion, and increase efficient use of fuel supplies with the least environmental and energy costs. The Energy Action Plan identifies strategies, such as assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs and encourages urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access. In the 2005 Energy Action Plan, the CEC and CPUC updated the energy policy vision by adding dimensions to the policy areas, such as information on the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the 2005 Energy Action Plan in 2008 that supplements the earlier Energy Action Plans and examines the State's ongoing actions in the context of global climate change.

Assembly Bill 1493

Assembly Bill 1493 (Chapter 200, Statutes of 2002), known as the Pavley Bill, amended Health and Safety Code Sections 42823 and added 43018.5, requiring CARB to develop and adopt regulations that

achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.

Senate Bills 350 and 100

The Clean Energy and Pollution Reduction Act of 2015 (Senate Bill [SB] 350) requires the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources to be increased to 50 percent by December 31, 2030. This act also requires doubling of the energy efficiency in existing buildings by 2030.

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, last updated by SB 350. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045.

California Code of Regulations Title 24 (California Building Code)

Updated every three years through a rigorous stakeholder process, Title 24 of the California Code of Regulations requires California homes and businesses to meet strong energy efficiency and sustainability measures, thereby lowering their energy consumption. Title 24 contains numerous subparts, including Part 1 (Administrative Code), Part 2 (Building Code), Part 3 (Electrical Code), Part 4 (Mechanical Code), Part 5 (Plumbing Code), Part 6 (Energy Code), Part 8 (Historical Building Code), Part 9 (Fire Code), Part 10 (Existing Building Code), Part 11 (Green Building Standards Code), Part 12 (Referenced Standards Code). The California Building Code is applicable to all development in California (Health and Safety Code Sections 17950 and 18938[b]).

The regulations receive input from members of industry, as well as the public, with the goal of "[r]educing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (Public Resources Code Section 25402). These regulations are scrutinized and analyzed for technological and economic feasibility (Public Resources Code Section 25402[d]) and cost effectiveness (Public Resources Code Sections 25402[b][2] and [b][3]).

Part 6 – Building Energy Efficiency Standards

California Code of Regulations Title 24 Part 6 is the Building Energy Efficiency Standards. This code, originally enacted in 1978, establishes energy efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. The Building Energy Efficiency Standards is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission.

In 2021, the California Energy Commission updated Title 24 standards with more stringent requirements that became effective January 1, 2023. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided these standards exceed those provided in Title 24.

The 2022 update to the Building Energy Efficiency Standards under Title 24 applies to buildings for which an application for a building permit is submitted on or after January 1, 2023. The updated standards mainly established electric-ready requirements when natural gas is installed, expanded solar photovoltaic and battery storage standards, and strengthened ventilation standards to improve indoor air quality.

Part 11 – California Green Building Standards

The California Green Building Standards Code, commonly referred to as "CALGreen" originally went into effect on August 1, 2009 and outlines architectural design and engineering principles that are in synergy with environmental resources and public welfare. CALGreen sets minimum standards for buildings, and since 2016, applies to new building construction and some alterations/additions within certain parameters. CALGreen establishes planning and design standards for sustainable site development, including water conservation measures and requirements that new buildings reduce water consumption by 20 percent below a specified baseline. CALGreen requires installations of 1.28 gallons-per-flush toilets and 0.5-gallon-per flush urinals for all non-residential projects as part of the prescriptive method of reducing indoor water use by the required 20 percent.

CALGreen lays out the minimum requirements for newly constructed residential and non-residential buildings to reduce GHG emissions through improved efficiency and process improvements. It also includes voluntary tiers to encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design. In addition, CALGreen includes several requirements related to solid waste diversion. Importantly, new non-residential construction is required to achieve at least 65 percent construction and demolition waste diversion and provide recycling areas for paper, cardboard, glass, plastics, metal, and organic waste. The 2022 CALGreen update primarily includes new requirements for the inclusion of EV charging stations and carbon dioxide monitoring and controls in classrooms. These requirements went into effect January 1, 2023. In addition, the State develops and adopts adjustments to its Building Codes and Standards in between the regular three-year adoption cycle, known as intervening cycle changes. Intervening cycle changes for the 2022 California Building Code and Standards include adjustments to CALGreen for multifamily, hotel, motel and nonresidential EV charging requirements. All jurisdictions are required to immediately adhere to the Intervening Code Adoption Cycle versions of Title 24 on July 1, 2024. On September 17, 2024, the City Council adopted the EV Reach Code for new construction akin to Tier 2 voluntary standards in CALGreen. The EV Reach Code would require more EV chargers and EV capable spaces than the CALGreen Code requires.

Assembly Bill 1007

Assembly Bill 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other federal, State, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

CARB In-Use On-Road and Off-Road Diesel Rules

The CARB In-Use On-Road and Off-Road Diesel Rules impose limits on idling, restrict the addition of older vehicles, and require the retirement or replacement of older engines depending on their fleet size category. This policy indirectly impacts energy consumption. More specifically, CARB is also charged with developing air pollution control regulations based upon the best available control measures and implementing every feasible control measure under the State and Federal Clean Air Act (Health and Safety Code Sections 39602.5, 39667, 43013[a, h], 43018, 40600, 40601, 40612[a][2] and [c][1][A]). Pursuant to these directives, stringent emission standards were adopted in 2004 for off-road construction equipment (i.e., "Tier 4" standards) (40 Code of Federal Regulations Parts 1039, 1065, and 1068; Title 13 California Code of Regulations Section 2025). CARB also adopted emission standards for on-road heavy duty diesel vehicles (i.e., haul trucks) (13 California Code of Regulations Section 1956.8). These haul truck regulations mandate fleet turnover to ensure that nearly all on-road diesel trucks will have 2010 model year engines or equivalent (i.e., Tier 4) by January 1, 2023.

California Advanced Clean Trucks Program

In June 2020, CARB approved the Advanced Clean Trucks regulation, which requires manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. In addition, the regulation requires company and fleet reporting for large employers and fleet owners with 50 or more trucks. By 2045, all new trucks sold in California must be zero-emission. Implementation of this regulation would reduce consumption of nonrenewable transportation fuels as trucks transition to alternative fuel sources.

c. Local Regulations

Goleta Climate Action Plan

The City of Goleta conducted a GHG emissions inventory in the City for 2007, which represents the baseline inventory, or existing conditions in the City. The inventory determined the City produced 325,532 metric tons carbon dioxide equivalent, excluding stationary sources, which is equivalent to the annual GHG emissions generated by approximately 68,000 passenger vehicles. The major source of GHG emissions in the City are associated with transportation, which contributed 48 percent of the City's total GHG emissions, followed by building energy (electricity and natural gas use) at 44 percent (City of Goleta 2014).

Adopted in July of 2014, the City of Goleta's Climate Action Plan (CAP) sets a 2020 target to achieve a 11 percent reduction below 2007 community-wide emissions. The CAP also has a 2030 target that is derived based on the linear trajectory between the 2020 reduction target and the 2050 target established by Executive Order S-3- 05, which sets a 2030 target of 26 percent below 2020 levels. The CAP contains GHG reduction measures for building energy efficiency, renewable energy, on-road transportation use, water consumption, off-road transportation equipment, solid waste generation, and municipal measures to meet the GHG reduction targets (City of Goleta 2014).

Strategic Energy Plan: City of Goleta

In December 2017, the City of Goleta City Council adopted a goal of 100 percent renewable electricity supply for the City by 2030 with an interim goal of 50 percent renewable electricity for municipal facilities by 2025. The City of Goleta then partnered with the County of Santa Barbara and the City of

Carpinteria to develop a Strategic Energy Plan (SEP) to meet these goals and improve the resiliency of the local electricity system by promoting local renewable energy development and energy efficiency deployment. The SEP was completed in July 2019, with the objective of meeting the City's 100 percent renewable electricity goals and address resiliency concerns by promoting renewable energy development in Goleta in the following ways (City of Goleta 2019):

1. Identifying the gap in forecasted electricity demand and baseline growth in renewable energy and energy efficiency to determine the necessary scope of the City's actions.
2. Identifying a set of policy measures and strategies in diverse program areas ranging from drafting regulatory frameworks to creating new financing mechanisms.
3. Evaluating the ability of these policy measures and strategies towards closing this gap and meeting the City's 100% renewable electricity goals.
4. Identifying total resource potential for distributed solar development in Goleta on rooftops and parking lots.
5. Creating a list of priority sites for renewable energy development throughout Goleta.

In recent years, the City has taken several steps toward achieving these goals, including, but not limited to, a solar photovoltaic project at City Hall that powers nearly 85 percent of Goleta City Hall's energy usage, and use of a solar EV charger. The City also has initiated construction of 17 additional EV Chargers at City Hall for public use.

City of Goleta General Plan/Coastal Land Use Plan

The City's General Plan/Costal Land Use Plan Conservation Element contains policies to promote energy conservation and reduce greenhouse gas emissions. Policies applicable to the proposed project include:

- **CE 13.2 Energy Efficiency in Existing and New Commercial and Industrial Development.** The following measures shall be employed to reduce energy consumption in existing and new commercial and industrial buildings:
  a. Reduction of energy consumption in existing buildings through improved design and management of heating, ventilation, air conditioning systems, and lighting is encouraged. Master metering is discouraged, and conversions to metering for individual tenant spaces shall be promoted where feasible.
  b. The City shall enforce the state's residential energy conservation building standards set forth in Title 24 through its plan check and building permit issuance processes.
  c. The City shall encourage nonresidential buildings to be designed in a manner that is appropriate for local climate conditions, taking into account natural light and ventilation, placement of landscaping, and use of integrated energy systems. This encompasses concepts such as cogeneration, waste heat systems, and other similar technologies.

- **CE 13.3 Use of Renewable Energy Sources.** For new projects, the City encourages the incorporation of renewable energy sources. Consideration shall be given to incorporation of renewable energy sources that do not have adverse effects on the environment or on any adjacent residential uses. The following considerations shall apply:
  a. Solar access shall be protected in accordance with the state Solar Rights Act (AB 2473). South wall and rooftop access should be achievable in low-density residential areas, while rooftop access should be possible in other areas.

b. New development shall not impair the performance of existing solar energy systems. Compensatory or mitigation measures may be considered in instances where there is no reasonable alternative.
c. Alternative energy sources are encouraged, provided that the technology does not contribute to noise, visual, air quality, or other potential impacts on nearby uses and neighborhoods.

Goleta Municipal Code

The City's Municipal Code Chapter 15.12 adopts by reference the 2022 California Green Building Standards Code and contains standards and incentives for projects utilizing green building practices.

4.5.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Energy consumption is analyzed in terms of construction and operational energy. Construction energy demand accounts for anticipated energy consumption during construction of the proposed project, such as fuel consumed by construction equipment and construction workers' vehicles traveling to and from the project site. Operational energy demand accounts for anticipated energy consumption during operation of the transportation system and land use scenario proposed by the project, such as fuel consumed by vehicles; natural gas consumed for on-site power generation and heating building spaces; and electricity consumed for building power needs, including, but not limited to lighting, water conveyance, and air conditioning.

The California Emissions Estimator Model (CalEEMod) Version 2022.1 was used to estimate energy consumption from construction and operation of the proposed project. The CalEEMod inputs and outputs (Appendix C) provide the vehicle miles traveled, vehicle trip numbers, and vehicle fleet mix during construction and operation of the proposed project. The CalEEMod outputs also provide the estimated gross electricity and natural gas consumption by land use during operation of proposed development on the project site. This information is used to determine the anticipated energy consumption during construction and operation of the proposed project.

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on energy. Would the project:

1. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The County's *Environmental Thresholds and Guidelines Manual* (2021; refer to Section 4.0, *Environmental Impact Analysis*) does not include thresholds related to energy. Therefore, the following analysis relies solely on the *CEQA Guidelines* Appendix G thresholds identified above.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact E-1 THE PROPOSED PROJECT WOULD UTILIZE GASOLINE, DIESEL, AND ELECTRICITY, BUT WOULD NOT RESULT IN THE WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Construction

During project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road heavy-duty vehicles and equipment on the project site, worker travel to and from the project site, and vehicles used to deliver materials to the project site. The proposed project would require demolition, site preparation, grading, building construction, paving, and architectural coating.

Information provided by the project applicant and the CalEEMod inputs and outputs for air pollutant and greenhouse gas emissions modeling (Appendix C) were used to estimate energy consumption associated with the proposed project. Construction activities would require approximately 2,725 gallons of gasoline and approximately 39,306 gallons of diesel fuel (Appendix F). This fuel use represents approximately 0.002 percent of the annual gasoline use and approximately 0.2 percent of the annual diesel use in Santa Barbara County, shown in Table 4.5-1. These construction energy estimates are conservative because they assume the construction equipment used in each phase of construction is operating every day of construction.

Energy use during construction would be temporary in nature and heavy-duty equipment used would be typical of similar-sized construction projects in the region. In addition, project contractors would be required to comply with the provisions of the California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Heavy-duty equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. These practices would result in efficient use of energy necessary to perform construction of the proposed project. Adherence to regulatory requirements designed to reduce energy consumption would ensure the construction of the proposed project would not involve the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant.

Operation

Operation of the proposed project would require energy use in the form of electricity, natural gas, and gasoline consumption. Natural gas would be used for heating and cooling systems and electricity would be used for lighting and appliances. The proposed project would be supplied electricity by 3CE using 100 percent renewable energy sources.

Gasoline and diesel consumption would be attributed to vehicular travel to and from the project site. Electricity and natural gas consumption would be attributed to operation of the industrial building. Operation of the proposed project, which includes the industrial building and vehicle travel, would result in the annual consumption of approximately 13,964 gallons of gasoline, 5,546 gallons of diesel, 788 megawatts of electricity, and 1,394 therms of natural gas, respectively (Appendix C; Appendix F).

This fuel use represents approximately 0.01 percent of the annual gasoline use, 0.03 percent of annual diesel use, 0.02 percent of annual electricity use, and 0.001 percent of natural gas use in Santa Barbara County, shown in Table 4.5-1, Table 4.5-2, and Table 4.5-3. In addition, 3CE anticipates a total wholesale demand of 6,156,000 megawatts in 2025 (3CE 2023c). The proposed project's annual 788 megawatt electricity demand would represent approximately 0.01 percent of the 2025 demand anticipated by 3CE. The proposed project would comply with standards set in California Building Code Title 24, which are specifically crafted so that buildings are required to be energy efficient and not consume energy in a wasteful, inefficient, or unnecessary manner. CALGreen (as codified in California Code of Regulations Title 24, Part 11) requires implementation of energy-efficient light fixtures and building materials into the design of new projects. In addition, CALGreen enforces stringent Heating, Ventilation and Air Conditioning (HVAC) guidelines, mandating the installation of energy-efficient HVAC equipment to minimize energy consumption. CALGreen also promotes the adoption of a well-insulated building envelope to reduce heating and cooling demands. The 2022 Building Energy Efficiency Standards (California Building Code Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the California Energy Code to achieve energy efficient performance. The proposed project would meet these energy performance standards through compliance with mandatory requirements of the 2022 Building Energy Efficiency Standards, including, but not limited to, limiting air leakage in the industrial building, installing lighting controls for new lighting, and ensuring appliances regulated by California Code of Regulations Title 20 that would be installed in the industrial building are certified by the CEC (CEC 2022).

As mentioned above, the proposed project would comply with CALGreen standards and California Code of Regulations provisions which would minimize the proposed project's potential to result in the wasteful, inefficient, or unnecessary consumption of vehicle fuels. Furthermore, idling of each truck would be limited to five consecutive minutes in accordance with California Code of Regulations Title 13 Section 2485 which would minimize energy use of trucks entering and exiting the project site. With the implementation of applicable energy efficiency measures, the proposed project would minimally increase energy demand and petroleum demand due to the development of the project, compared with existing conditions.

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

Mitigation Measures

No mitigation measures are required.

Threshold 2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact E-2 THE PROPOSED PROJECT WOULD CONSUME ENERGY, BUT ENERGY CONSUMPTION WOULD NOT CONFLICT WITH SENATE BILL 100, THE CITY'S CLIMATE ACTION PLAN, STRATEGIC ENERGY PLAN, OR GENERAL PLAN/COASTAL LAND USE PLAN. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT.*

The City's CAP, Strategic Energy Plan, General Plan/Coastal Land Use Plan, and Municipal Code contain measures intended to increase energy efficiency and expand the use of renewable energy in Goleta. As described in Impact E-1, the proposed project would comply with CALGreen and the Building Energy Efficiency Standards. The proposed project would implement light-emitting diode (LED) lighting, and indoor water use efficiency measures to limit the energy consumption necessary for

operation of the proposed project and assist to meet the City's renewable energy goals. Furthermore, the proposed project would be supplied electricity by 3CE using 100 percent renewable energy sources consistent with the measures of the CAP, Strategic Energy Plan, General Plan/Coastal Land Use Plan, and Municipal Code to expand the use of renewable energy in Goleta. The proposed project's design currently includes nine parking spaces with EV chargers which would encourage the use of EVs and the reduction of vehicle fuel consumption. An additional 19 parking spaces would include electrical panel space and load capacity to support future electrical infrastructure for EV charging. The CALGreen intervening code update, which went into effect July 1, 2024, requires nonresidential development providing between 101-150 parking spaces to provide a minimum of 25 EV-capable parking spaces with 6 parking spaces including electric vehicle supply equipment. The proposed project's 28 total EV capable spaces with 9 of those spaces including EV chargers would fulfil the requirements of the CALGreen intervening code update. The City's EV Reach Code for new construction would require the proposed project to provide a minimum of 57 EV-capable parking spaces with 19 parking spaces including electric vehicle supply equipment. The Reach Code was adopted on September 17, 2024; therefore, the project applicant would be required to install the additional EV parking infrastructure in order to comply with the EV Reach Code. Accordingly, the proposed project would not conflict with state or local EV parking requirements.

The proposed project would also include 10 bicycle parking spaces and would connect to existing bicycle facilities in Goleta. The proposed bicycle parking spaces would encourage the use of alternative modes of transportation which would reduce vehicle travel and associated fuel consumption. These project design features would ensure the proposed project would not conflict with or obstruct the City's CAP, Strategic Energy Plan, General Plan/Coastal Land Use Plan, or Municipal Code. As stated above, the proposed project would be supplied electricity by 3CE using 100 percent renewable energy sources which would ensure the proposed project is consistent with the requirements of SB 100. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.5.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts that would occur from impacts of reasonably anticipated projects identified in Table 3-1 of Section 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this EIR is discussed in Section 3, *Environmental Setting*.

Cumulative development in Goleta would increase demand for energy resources. However, the California Building Energy Efficiency Standards and CALGreen require energy efficient appliances and building materials that reduce energy consumption in new development. Furthermore, vehicle fuel efficiency is anticipated to continue improving through implementation of the existing Pavley regulations in accordance with Assembly Bill 1493. The City's General Plan/Coastal Land Use Plan includes Policies TE 1.6, TE 7.2, and TE 7.12 which allows the City to require developers to provide improvements that reduce the use of single-occupancy vehicles, requires the City to collaborate with the Santa Barbara Metropolitan Transit District to ensure bus transit is reliable throughout Goleta, and allows the City to require new or substantially renovated development to incorporate design measures to facilitate transit use. The City's CAP includes measures such as requiring projects to dedicate land for bicycle trails, requiring projects along transit corridors to provide for transit access, and requiring preferential parking to commuters who carpool, vanpool, ride-share, or use

alternatively fueled vehicles. Continual implementation of these policies in the City's General Plan/Coastal Land Use Plan and measures included in the City's CAP would ensure new development would promote alternative transportation and reduce vehicle travel. As a result of increasing energy-efficiency standards associated with electricity and natural gas consumption, water use, and transportation, the combined increase in energy consumption in Goleta would not be expected to result in wasteful, inefficient, and unnecessary consumption of energy resources. Therefore, cumulative energy impacts would be less than significant. Similar to cumulative development, the proposed project would adhere to California Building Energy Efficiency Standards and CALGreen energy-efficiency requirements. The proposed project would implement features such as EV parking and bicycle spaces to encourage use of EVs and alternative transportation which would decrease operational energy consumption. Therefore, the proposed project would not have a cumulatively considerable contribution to cumulative energy consumption impacts.

Cumulative development, like the proposed project, would be constructed in accordance with the California Building Energy Efficiency Standards, CALGreen requirements, and the City's CAP. Similar to the proposed project, cumulative development would receive electricity that is procured in compliance with SB 100 which would promote the use of renewable energy. As a result, cumulative impacts related to conflicts with renewable energy plans would be less than significant, and the proposed project would not have a cumulatively considerable contribution to cumulative impacts to conflicts with renewable energy plans.

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4.6 Geology and Soils

This section discusses the project's potential impacts relating to geologic hazards and paleontological resources. This section is partially based on the *Revised Geotechnical Engineering Report Update* included as Appendix G and the *Preliminary Drainage Design* included as Appendix H.

4.6.1 Environmental Setting

a. Geologic Setting

Regional

The City of Goleta occupies a portion of the eight-mile long and three-mile wide flat alluvial plain known as the Goleta Valley (City of Goleta 2006). The Goleta Valley is a broad, flat alluvial plain bordered on the south by the bluffs of the Pacific coastline, and on the north by foothills and terraces of the foreland of the Santa Ynez Mountain Range. It generally slopes gently into the Goleta Slough, which is located in the south central portion of the valley.

Project Site

The project site is relatively flat along the perimeter and driveway aisles, but gently sloping where vehicles would previously park on graded berms to view the movie screen when the drive-in theater was operational. Surface drainage on the project site occurs through sheet flow (Appendix G), and the project site contains two existing dewatering wells with sump pumps, located in the northeast and southwest portions of the project site. The project site is currently configured like a bowl, with drainage flows directed to the southwestern pump that discharges through the San Jose Creek Channel levee into the San Jose Creek. Ground elevations range from 7 feet at the southwestern pump to approximately 15 feet at the San Jose Creek levee. Flows in San Jose Creek generally run from north to south, out to the Pacific Ocean (Appendix H).

The project site's general subsurface profile consists of fill soils overlying alluvial soils, which were further underlain with estuary deposit soils. All of these soils exist as layered sands, or layered sands and clays. Project site sands were observed to be in a moist to wet condition with a loose consistency, and clays were moist to wet, and very soft to medium-stiff. Variable amounts of shells were observed within the project site's estuary deposit soil layers. Subsurface water was encountered at depths ranging from approximately 3 to 7.5 feet below the existing ground surface (Appendix G).

b. Seismic and Other Geologic Hazards

Seismic Hazards

Similar to much of California, the project site is located within a seismically active region. The Transverse Ranges are characterized by east-west trending structural features in contrast to the dominant northwest-southeast structural trend of California. The project site is not located in an Alquist-Priolo Fault Zone (California Geologic Survey [CGS] 2023). The closest Alquist-Priolo mapped earthquake fault to the project site is the Pitas Point—Red Mountain Fault South Strand Fault, located over 20 miles to the southeast. The nearest fault to the project site is the More Ranch Fault, part of the Mission Ridge Fault System, located approximately 690 feet from the southern limit of the project site (Appendix G). The following subsections discuss regional faults capable of generating strong

seismic shaking at the project site, and is based on information from the *Revised Geotechnical Engineering Report Update* (Appendix G).

Mission Ridge Fault System

The Mission Ridge fault system consists of an approximately 45-mile, essentially continuous fault system that extends from Goleta to Ojai along the southern flank of the Santa Ynez Mountains. The Mission Ridge fault system includes the More Ranch, Mission Ridge, Arroyo Parido, and Santa Ana faults, with the More Ranch fault located 690 feet south of the project site (Appendix G). The More Ranch Fault is a minor fault is not classified as active by the State Division of Mines and Geology or subject to an Alquist-Priolo Special Studies Zone; however, according to the Santa Barbara County Seismic Safety and Safety Element (SSSE), the More Ranch Fault is considered active based on the existence of a geologically recent fault scarp (City of Goleta 2006). This fault is estimated to be capable of a magnitude 6.9 earthquake.

Red Mountain Fault

The Red Mountain Fault is a north-dipping reverse fault with a length of approximately 10 miles. The southern branch of the Red Mountain Fault is located offshore, approximately 3.4 miles from the project site. This fault is estimated to be capable of a magnitude 7.4 earthquake.

Pitas Point Fault

The Pitas Point fault is a north-dipping reverse fault with a length of approximately 12 miles. This fault is located approximately 6.4 miles south of the project site and is estimated to be capable of a magnitude 7.2 earthquake.

Oak Ridge Fault

The Oak Ridge fault is a segmented fault with onshore and offshore segments. The offshore segment is located approximately 8.2 miles south of the project site and is estimated to be capable of a magnitude 6.9 earthquake.

Santa Ynez Fault

The Santa Ynez fault has a length of approximately 80 miles and is divided into east and west segments. This fault is a south-dipping reverse fault and forms part of the northern boundary of the Santa Ynez Mountains. This fault is located approximately 8.2 miles north of the project site and is estimated to be capable of a magnitude 7.1 earthquake.

Los Alamos Fault

The Los Alamos fault is a northwest trending fault that is approximately 17 miles long. This fault is located approximately 9.3 miles northwest of the project site and is estimated to be capable of a magnitude 6.9 earthquake.

San Andreas Fault

The San Andreas fault is considered the most active fault in the region, and is located approximately 43 miles northeast of the project site. Some segments of this fault are estimated to be capable of a magnitude 7.5 earthquake, but simultaneous rupture of more than one segment may cause a magnitude 8.0 earthquake, or greater.

Other Geologic Hazards

The project site is approximately 0.5 mile from the Pacific Ocean from the project's southern limit. According to the City's General Plan, the project site is located inside a Tsunami Hazard Area (City of Goleta 2006); however, the Tsunami Hazard Area Map for the County of Santa Barbara, updated on July 8, 2021, indicates that the project site is outside the tsunami hazard zone (County of Santa Barbara 2021). Given that the County of Santa Barbara uses more recent data than the City's General Plan, the County's determination is applied to this analysis. Tsunamis are discussed further in Section 4.8, *Hydrology and Water Quality*.

Other potential seismic hazards known to occur within the vicinity of the project site include ground rupture, groundshaking, liquefaction, and settlement, which are discussed in more detail below.

Ground Rupture

Seismically induced ground rupture occurs as the result of differential movement across a fault. An earthquake occurs when seismic stress builds to the point where rocks rupture. As the rocks rupture, one side of a fault block moves relative to the other side. The resulting shock wave is the earthquake. If the rupture plane reaches the ground surface, ground rupture occurs. Potentially active faults are those that have moved during the last 2.5 million years, but not during the last 10,000 years while active faults show evidence of movement within the last 10,000 years. No fault zones are located on the project site according to the Goleta General Plan/Coastal Land Use Plan Geologic Hazards Map (2009). Therefore, ground rupture is not a potential concern on the project site.

Groundshaking

In addition to surface rupture, fault displacement can generate seismic groundshaking, which is the greatest cause of widespread damage in an earthquake. Whereas surface rupture affects a narrow area above an active fault, groundshaking covers a wide area and is greatly influenced by the distance of the site to the seismic source, soil conditions, and depth to groundwater. Many faults are mapped in the foothills of the Santa Ynez Mountains and coastal plans of Santa Barbara County with varying types, lengths, and ages. In addition to damage to structural development, ground shaking can also cause seismic settlement and subsidence, lurch cracking, and lateral spreading. The project site may be subject to strong groundshaking due to potential fault movement from regional faults, including the Mission Ridge, Red Mountain, Pitas Point, Oak Ridge, Santa Ynez, Los Alamos, and San Andreas faults (Appendix G).

Landslides

Landslides are the mass movement of rock, debris, or earth down a slope, usually in conjunction with earthquakes, floods, or prolonged precipitation. The project site is not located in a potential landslide area as identified by the Goleta General Plan Geologic Hazards Map (City of Goleta 2009).

Liquefaction

Liquefaction is a seismic phenomenon in which loose, saturated granular and non-plastic fine-grained soils lose their structure/strength when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist:

1. Shallow groundwater (within the top 50 feet of the ground surface);
2. Low density non-plastic soils; and
3. High intensity ground motion.

According to the *Geotechnical Engineering Report Update*, there is a potential for liquefaction to occur on the project site. Total and differential dynamic settlement due to liquefaction may approach approximately 4 inches and 2 inches, respectively (Appendix G).

Seismically Induced Settlement

Seismically induced settlement of dry sand is caused by a substantial seismic event and may occur in lower density sand and silt soils that are not saturated by groundwater. During a major earthquake, the air-filled void spaces between the unsaturated soil particles tend to compress, which translates to a decrease in volume or settlement. According to the *Geotechnical Engineering Report Update*, there is a potential for seismically induced settlement of dry sand to occur on the project site. Total and differential seismically induced settlement of dry sand may approach 2 inches and 1 inch, respectively (Appendix G).

Lateral Spreading

Lateral spread is a pervasive type of liquefaction-induced ground failure that occurs on gentle slopes or near free-faces[1], such as river channels. Lateral spreading movement may occur when a soil mass slides laterally on liquefied soils moving downslope or towards a free-face, as the result of a liquefaction during a groundshaking event. The topographic conditions at the project site are relatively flat; however, there is a free-face along San Jose Creek, which flows parallel to and is on the southeast side of the entrance driveway. In the event of liquefaction caused by groundshaking, the project site could move laterally approximately 6 inches towards San Jose Creek (Appendix G).

Expansive Soils

Soils with relatively high clay content are expansive due to the capacity of clay minerals to take in water and swell (expand) to greater volumes. Expansive soils tend to swell with seasonal increases in soil moisture and shrink during the dry season as soil moisture decreases. According to the *Geotechnical Engineering Report Update* prepared by Earth Systems Pacific, soils on the project site within the development area are non-expansive (Appendix G).

Corrosive Soils

Corrosive soils contain chemical constituents that can react with construction materials, such as concrete and ferrous metals, which may damage underground infrastructure and building foundations over time. According to the *Geotechnical Engineering Report Update* prepared by Earth Systems Pacific, project site soils are classified as “moderately corrosive to corrosive” (Appendix G).

Erosive Soils

Soil erosion is the removal of soil by water and wind. Factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. According to the *Geotechnical Engineering Report Update* prepared by Earth Systems Pacific, project site surface soils are highly erodible (Appendix G).

[1] A free-face is a vertical or steeply inclined layer of rock from which weathered material falls to form fragments at its base.

c. Paleontological Resources

The project site is underlain by Holocene and upper Pleistocene (Quaternary-era) alluvium and colluvium (Qac), which consists of poorly consolidated silt, sand, and gravel deposits of modern drainages and piedmont alluvial fans and floodplains (United States Geologic Survey 2007). Quaternary-era alluvial materials are assigned a low paleontological resource sensitivity due to their relatively recent age, and there are no known recorded paleontological resources found within the Qac geologic unit in Santa Barbara County (Paleobiology Database 2023).

4.6.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

Please refer to Section 4.9.2, subsection (a), in Section 4.9, *Hydrology and Water Quality*, for a detailed description of how the Clean Water Act applies as a federal regulation to the proposed project.

b. State Regulations

California Coastal Act

The California Coastal Act, enacted in 1976, establishes procedures for the review of proposed developments in the Coastal Zone and policies for the protection of coastal resources and public access to the coastline. The project site is located in the Coastal Zone; therefore, Section 30253 of the California Coastal Act pertains to aesthetics of the project.

> **Section 30253**: New development shall: (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

California Building Code

California law provides a minimum standard for building design through the California Building Code (CBC) (C.C.R. Title 24). Chapter 23 of the CBC contains specific requirements for seismic safety. Chapter 29 regulates excavation, foundations, and retaining walls. Chapter 33 of the CBC contains specific requirements pertaining to site demolition, excavation, and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials. Chapter 70 of the CBC regulates grading activities, including drainage and erosion control. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in California Division of Occupational Safety and Health (Cal/OSHA) regulations (C.C.R. Title 8). The CBC requires consideration of soil-related geotechnical hazards, such as addressing hazardous soil conditions involving removal, proper fill selection, and compaction prior to construction. The City of Goleta is responsible for enforcing the CBC.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was signed into law in 1972 (Public Resources Code § 2621, et seq.; 14 C.C.R. §§ 3600, et seq.). The purpose of this Act is to prohibit the location of most structures for human occupancy across the traces of active faults and to thereby mitigate the hazard of fault rupture. Under the Act, the State Geologist identifies "Earthquake Fault Zones" along known active faults in California (14 C.C.R. §3601). Cities and counties affected by the zones must regulate certain development projects within the zones. They must withhold development permits for sites within the zones until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting (14 C.C.R. §3603).

Seismic Hazards Mapping Act

The California Geologic Survey, formerly the California Department of Conservation, Division of Mines and Geology (CDMG), provides guidance with regard to seismic hazards. Under CDMG's Seismic Hazards Mapping Act (1990), seismic hazard zones are to be identified and mapped to assist local governments in land use planning (Public Resources Code §§ 2690, et seq.). The intent of these maps is to protect the public from the effects of strong ground shaking, liquefaction, landslides, ground failure, or other hazards caused by earthquakes. In addition, CDMG's Special Publications 117, "Guidelines for Evaluating and Mitigating Seismic Hazards in California," provides guidance for the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations.

Post-Construction Stormwater Management Requirements

Please refer to Section 4.9.2, subsection (c), in Section 4.9, *Hydrology and Water Quality*, for a detailed description of post-construction stormwater management requirements and how they apply as a local regulation for the proposed project.

California Environmental Quality Act

Paleontological resources are protected under CEQA, which states, in part, that a project will "normally" have a significant effect on the environment if it, among other things, will disrupt or adversely affect a paleontological site except as part of a scientific study. Specifically, in Appendix G of the State CEQA Guidelines the question is posed, "Will the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature." To determine the uniqueness of a given paleontological resource, it must first be identified or recovered. Therefore, mitigation of adverse impacts to the extent practicable to paleontological resources is mandated by CEQA.

c. Local Regulations

City of Goleta General Plan

The Safety Element of the Goleta General Plan contains policies intended to reduce the potential for geologic hazards to adversely affect people and property, including the following:

- **Policy SE 1.3: Site-Specific Hazards Studies.** Applications for new development shall consider exposure of the new development to coastal and other hazards. Where appropriate, an application for new development shall include a geologic/soils/geotechnical study and any other studies that identify geologic hazards affecting the proposed project site and any necessary mitigation measures. The study report shall contain a statement certifying that the project site is

suitable for the proposed development and that the development will be safe from geologic hazards. The report shall be prepared and signed by a licensed certified engineering geologist or geotechnical engineer and shall be subject to review and acceptance by the City.

- **Policy SE 1.6: Enforcement of Building Codes.** The City shall ensure through effective enforcement measures that all new construction in the city is built according to the adopted building and fire codes.
- **Policy SE 4.3: Geotechnical and Geologic Studies Required.** Where appropriate, the City shall require applications for planning entitlements for new or expanded development to address potential geologic and seismic hazards through the preparation of geotechnical and geologic reports for City review and acceptance.

Please see Section 4.10, *Land Use and Planning*, for a comprehensive discussion of applicable goals and policies.

City of Goleta Municipal Code

Development in Goleta must regulate stormwater flows during grading in accordance with Chapter 15.09, *Grading, Erosion, and Sediment Control*, of the City's Municipal Code. The requirements of Chapter 15.09 are applicable to all lands within Goleta. Pursuant to 15.09.290, an applicant must submit an erosion and sediment control plan in order to obtain grading permits which must incorporate applicable City-approved BMPs to reduce erosion. If an individual development requires preparation of an SWPPP the City may accept the SWPPP if it contains the City's required elements of an erosion and sediment control plan. Pursuant to Section 15.09.290 of the Municipal Code, the erosion and sediment control plan shall contain the following:

- A delineation and brief description of the proposed practices to retain sediment on the site, including sediment basins and silt traps, and a schedule for their maintenance;
- The location and a brief description of the surface runoff and erosion control practices to be implemented, including types and methods of applying mulches, hydro seeding, or other slope stabilization methods; construction material and waste management practices to be used, including temporary borrow and waste disposal areas, temporary debris and garbage disposal, and chemical/fuel storage areas;
- A brief description of the vegetative practices to be used, including toes of seeds and fertilizer and their application rates, dates of seeding and a schedule for maintenance and upkeep, including irrigation;
- A brief description of reasonable precautionary measures to ensure that vehicles do not track or spill earth materials into public streets and actions necessary to remove such materials if the materials are spilled or tracked; and
- Drainage, erosion and sediment control plans shall include best management practices for control of pollutants from onsite stormwater discharges and non-stormwater discharges, such as discarded building materials, litter, sanitary waste, and the washout of excess construction materials, including, but not limited to, drywall, grout, gypsum, plaster, mortar and concrete. Water contaminated with washout pollutants shall be collected and controlled and shall be removed from the site.

Furthermore, an erosion and sediment control plan is required to specify which erosion control measures necessary to control runoff shall be in place during the rainy season (November 1st through April 15th) and which measures shall be in place year-round. At a minimum, during the rainy season

no grading shall occur unless approved erosion and sediment control measures are implemented. Erosion and sediment control measures shall be in place prior to any grading on hillsides, sloping or mountainous terrain. Measures for non-stormwater construction site discharge control shall be implemented year-round. Pursuant to Section 15.09.310, the Director of the Planning and Environmental Services Department or authorized representative may implement a stop work order where there is reason to believe the requirements of Chapter 15.09 are not being upheld.

4.6.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Assessment of impacts is based on review of site information and conditions and the following reports prepared for the project site:

- *Revised Geotechnical Engineering Report Update, Goleta Business Center Building, 907 South Kellogg Avenue, Goleta, California*. This report was prepared by Earth Systems Pacific in 2022, peer-reviewed by Rincon Consultants, Inc. in 2023, and revised by Earth Systems Pacific in January 2023. This report is summarized and referenced herein as Appendix G.
- *Preliminary Drainage Design for Goleta Business Park*. This report was prepared by Stantec in 2022, peer-reviewed by Rincon Consultants, Inc. in 2023, and revised by Stantec in January 2023. This report is summarized and referenced herein as Appendix H.

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the thresholds used for this analysis are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*.

Significance Thresholds

In accordance with CEQA Guidelines Appendix G, a project would result in a significant impact if it would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    a. 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;
    b. Strong seismic ground shaking;
    c. Seismic-related ground failure, including liquefaction; and
    d. Landslides.
2. Result in substantial soil erosion or the loss of topsoil;
3. 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;
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;

5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; and/or
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Pursuant to the County of Santa Barbara's 2021 *Environmental Thresholds Guidelines Manual*, impacts are classified as potentially significant with regard to geology if:

a. The project site or any part of the project is located on land having substantial geologic constraints, as determined by Planning and Environmental Review or Public Works departments. Areas constrained by geology include parcels located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion. "Special Problems" areas designated by the Board of Supervisors have been established based on geologic constraints, flood hazards and other physical limitations to development;
b. The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5 horizontal to 1 vertical;
c. The project proposes construction of a cut slope over 15 feet in height as measured from the lowest finished grade; and
d. The project is located on slopes exceeding 20 percent grade.

Because geologic conditions are highly variable within Santa Barbara County, these guidelines are not fixed thresholds upon which a determination of significant impact would be made. They serve to point out when further study of site-specific conditions is required in order to assess geologic impacts.

b. Project Impacts and Mitigation Measures

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

Impact GEO-1 NO FAULTS ARE LOCATED ON THE PROJECT SITE. THE PROJECT WOULD HAVE NO IMPACT.

Based on the *Revised Geotechnical Engineering Report Update* conducted by Earth Systems Pacific in 2022 and a review of geologic hazards mapping in the Goleta General Plan, no active or potentially active faults are located on the project site. The nearest Alquist-Priolo Earthquake Fault Zone to the project site is approximately 20 miles to the southeast (CGS 2023), and the nearest known fault to the project site is the More Ranch Fault, located approximately 690 feet south of the project site. The potential for surface fault rupture to occur at the project site is low (Appendix G). There would be no impacts involving rupture of a known earthquake fault.

Mitigation Measures

No mitigation measures are required.

Threshold 1b: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Impact GEO-2 THE PROJECT SITE IS LOCATED IN A SEISMICALLY ACTIVE AREA AND SEISMIC ACTIVITY IN THE PROJECT SITE'S REGIONAL AREA COULD AFFECT THE PROJECT SITE. IMPLEMENTATION OF MITIGATION MEASURE GEO-1 WOULD REQUIRE INCORPORATION OF SEISMIC DESIGN RECOMMENDATIONS FROM THE PROJECT'S GEOTECHNICAL REPORT AND CALIFORNIA BUILDING CODE REQUIREMENTS INTO THE PROJECT'S STRUCTURAL DESIGN, WHICH WOULD REDUCE IMPACTS INVOLVING RUPTURE OF A KNOWN EARTHQUAKE FAULT OR SEISMIC GROUND SHAKING TO CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.*

The project site is located in a region of high seismic activity, with the potential for large seismic events that could generate strong ground shaking. Primary seismic risks at the project site would be earthquakes generated by local faults, as well as larger regional faults, such as the San Andreas fault (Appendix G). The building's structural design would consider seismic loads, as required by the CBC (Appendix G); however, in the event of an earthquake the proposed building could result in substantial adverse effects involving strong seismic ground shaking. Therefore, this impact would be potentially significant and mitigation is required.

Mitigation Measures

GEO-1 Geotechnical Design Considerations

The project design engineer shall incorporate the recommendations listed below from the *Revised Geotechnical Engineering Report Update* (Appendix G) into the project's grading and building plans. The applicant shall submit the grading and building plans to the Planning and Environmental Review Director or designee for review and approval prior to issuance of grading and building permits for the project.

GRADING

1. Following site preparation, the soil within the building and improvement areas shall be removed to a level plane to a minimum depth of 2 feet below ground surface (bgs). During construction, locally deeper removals may be recommended based on field conditions. The resulting soil surface shall then be scarified, moisture conditioned, and compacted prior to placing any fill soil.
2. Following site preparation, the soils in fill areas beyond the building and surface improvement areas shall be removed to a minimum depth of 2 feet bgs. During construction, locally deeper removals may be recommended based on field conditions. The resulting soil surface shall then be scarified, moisture conditioned, and compacted prior to placing any fill soil.
3. Voids created by dislodging cobbles and/or debris during scarification shall be backfilled and compacted, and the dislodged materials shall be removed from the area of work.
4. On-site material and approved import materials may be used as general fill and up to 4 feet below the deepest mat foundation element within the building area of the building. All imported soil shall be non-expansive. Proposed imported soils shall be evaluated by the geotechnical engineer before being used, and on an intermittent basis during placement on the site.
5. All materials used as fill shall be cleaned of any debris and rocks larger than 6 inches in diameter. No rocks larger than 3 inches in diameter shall be used within the upper 3 feet of finish grade. When fill material includes rocks, the rocks shall be placed in a sufficient soil matrix to ensure that voids caused by nesting of the rocks will not occur and that the fill can be properly compacted.

6. Under the mat foundation for the building, Tensar IX 160 triaxial geogrid or an approved equivalent shall be placed on a level plane 4 feet below the bottom of the deepest foundation element within the building area. The geogrid shall also extend vertically up the 4-foot sides of the excavation. Two feet of moisture conditioned and compacted Class 2 AB (Caltrans, 2018) shall then be placed to a level plane on top of the first geogrid within the building area. Another or second layer of Tensar TX 160 triaxial geogrid or an approved equivalent shall be placed on the top of the first layer of AB within the building area; however, it does not need to extend up the sides of the excavation. Another 2 feet of moisture conditioned and compacted AB shall then be placed to a level plane on the geogrid within the building area. The bottom layer of geogrid that was extended up the sides of the excavation shall then be folded down on top of the second layer of compacted AB such that it creates a minimum 5-foot overlap on top of the compacted AB surface. Previously excavated soil or Class 2 AB may then be placed as moisture conditioned and compacted fill back up to pad grade. The geogrid shall be placed and overlapped as recommended by the manufacturer.
7. Fill slopes shall be keyed and benched into competent soil as generally shown on the Typical Bench and Keyway Detail presented in Appendix E. The geotechnical engineer shall approve all keyways and benches. The keyway shall be a minimum of 10 feet wide.
8. Slopes under normal conditions shall be constructed at 2 to 1 (horizontal to vertical) or flatter inclinations. Slopes subject to inundation shall be constructed at 3 to 1or flatter inclinations.

FOUNDATIONS (GENERAL)

1. The allowable bearing capacity and/or modulus of subgrade reaction may be increased by one-third when transient loads, such as wind or seismicity, are included if the structural engineer determines they are allowed. The foundations shall be designed using the seismic information presented in the “Seismic Design Parameters” listed in the “Ground Motion Analyses” section of this report.
2. Foundation excavations shall be observed by the geotechnical engineer prior to rebar and PCC placement. Footing excavations shall be thoroughly moistened prior to PCC placement and no desiccation cracks shall be present.
3. The Corrosion Evaluation Report prepared by CERCO Analytical, Inc. and presented in Subappendix C of the *Revised Geotechnical Engineering Report Update* shall be used by the architect/engineer in specifying appropriate corrosion protection measures for all foundation elements.

DRAINAGE

1. Unpaved ground surfaces shall be finish graded to direct surface runoff away from foundations and other improvements at a minimum 5 percent grade for a minimum distance of 10 feet. The site shall be similarly sloped to drain away from foundation, slopes, and other improvements during construction. Where this is not practicable due to property lines, other improvements, etc., swales with improved surfaces, area drains, or other drainage facilities, shall be used to collect and discharge runoff.
2. To reduce the potential for planter drainage from gaining access to subslab areas, any raised planter boxes adjacent to foundations shall be installed with drains and sealed sides and bottoms. Drains shall also be provided for areas adjacent to the foundations that would not otherwise freely drain.

3. The building roof shall be fitted with roof gutters. Runoff from flatwork, roof gutters, downspouts, planter drains, area drains, etc. shall discharge in a nonerosive manner away from foundations and other improvements in accordance with the requirements of the governing agencies.
4. The on-site soils are highly erodible; stabilization of soils disturbed during construction by vegetation or other means during and following construction is essential to reduce erosion damage. Care shall be taken to establish and maintain vegetation. The landscaping shall be planned and installed to maintain the surface drainage recommended above. Surface drainage shall also be maintained during construction.
5. To reduce migration of surface drainage into the subgrade, maintenance of pavement areas is critical. Any cracks that develop in the pavement shall be promptly sealed.
6. The owner or site maintenance personnel shall periodically observe the areas within and around the site for indications of rodent activity and soil instability. The owner or site maintenance personnel shall also implement an aggressive program for controlling the rodent activity in the general area.

Plan Requirements and Timing. Grading and building plans shall be submitted for review and approval by the Planning and Environmental Review Director or designee before the City issues grading and building permits.

Monitoring. The project soils engineer shall observe all excavations before placement of fill and report observations to the City. The City will conduct field inspections as needed.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to groundshaking on the project site to a less than significant level through incorporation of building foundation recommendations into the project, which would ultimately reduce the magnitude of future groundshaking events, should they occur.

Threshold 1c:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?
Threshold 3:	Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Impact GEO-3 **THE *REVISED GEOTECHNICAL ENGINEERING REPORT UPDATE* DETERMINED THAT LIQUEFACTION AND SUBSIDENCE MAY DAMAGE FUTURE DEVELOPMENT ON THE PROJECT SITE. THE PROJECT SITE IS NOT AT RISK OF LANDSLIDE, LATERAL SPREADING, OR COLLAPSE. IMPLEMENTATION OF MITIGATION MEASURE GEO-1 WOULD REQUIRE INCORPORATION OF GRADING AND BUILDING FOUNDATION RECOMMENDATIONS INTO THE PROJECT DESIGN, WHICH WOULD REDUCE THIS IMPACT TO CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.**

Unstable soils may experience landslides, lateral spreading, subsidence, liquefaction, or collapse during seismic events. Lateral spreading involves the horizontal movement of soil or rock layers, subsidence (also referred to as settlement) refers to the downward sinking of the ground surface, liquefaction specifically refers to the loss of soil strength during seismic activity, and collapse refers to the sudden failure or loss of stability of a soil or rock structure. The *Revised Geotechnical Engineering Report Update* indicated both liquefaction and settlement are potential concerns for

project site soils, and did not identify the project site to be at risk of landslides, lateral spreading, or collapse (Appendix G).

Soil borings on the project site indicate that there is a potential for both liquefaction and seismically induced settlement of dry sand to occur. Total and differential dynamic settlement due to liquefaction may approach approximately 4 inches and 2 inches, respectively; and total and differential seismically induced settlement of dry sand may approach 2 inches and 1 inch, respectively. Total dynamic settlement refers to the overall vertical displacement of the ground caused by a seismic event and includes both immediate settlement during the earthquake and any subsequent settlement as the soil reconsolidates. Differential dynamic settlement refers to variations in the vertical movement of different parts of the ground surface during a seismic event. It signifies that different areas or structures may experience different degrees of settlement, leading to uneven ground surfaces and potential damage or stability issues for structures built on or within the affected area.

Thus, during an earthquake-induced liquefaction event, the total vertical movement of the ground surface could reach around 4 inches, while the variation in settlement between different areas or structures within the affected zone could be up to approximately 2 inches. Additionally, if dry sand on the project site is subjected to seismic activity, the total vertical movement of the ground surface could reach approximately 2 inches. Similarly, the variation in settlement between different areas or structures within the affected zone could be up to approximately 1 inch.

Settlement resulting from liquefaction and seismic activity may damage the building foundation and surface improvements. Therefore, this impact is potentially significant, and mitigation is required.

Mitigation Measures

Mitigation Measure GEO-1 (Refer to Impact GEO-2).

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to liquefaction resulting in settling of soils on the project site to a less than significant level through incorporation of grading and building foundation recommendations into the project, which would reduce the combined magnitude of both liquefaction and seismically induced settlement would be less than four inches (Appendix G).

Threshold 1d: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Impact GEO-4 **THE PROJECT WOULD NOT CAUSE THE RISK OF LOSS, INJURY, OR DEATH INVOLVING LANDSLIDES AS THE PROJECT SITE IS NOT LOCATED IN A POTENTIAL LANDSLIDE AREA. THE PROJECT WOULD HAVE NO IMPACT.**

The project site is not located in a potential landslide area as identified by the Goleta General Plan Geologic Hazards Map (City of Goleta 2009). The *Revised Geotechnical Engineering Report Update* did not identify the project site to be at risk of landslides (Appendix G). Therefore, the project would have no impact involving landslides.

Mitigation Measures

No mitigation measures are required.

Threshold 2: Would the project result in substantial soil erosion or the loss of topsoil?

Impact GEO-5 SOILS ON THE PROJECT SITE ARE HIGHLY ERODIBLE, AND ON-SITE DEVELOPMENT MAY INCREASE SOIL EROSION DURING AND AFTER CONSTRUCTION ACTIVITIES. IMPLEMENTATION OF MITIGATION MEASURE GEO-1 WOULD INCORPORATE GRADING AND DRAINAGE RECOMMENDATIONS INTO PROJECT DESIGN, WHICH WOULD REDUCE THIS IMPACT TO CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

Construction

According to the *Revised Geotechnical Engineering Report Update*, surface soils on the project site are highly erodible (Appendix G). As discussed in Section 2, *Project Description*, the project would require the excavation and export of approximately 11,400 cubic yards of soil during construction activities. Construction activities would disturb approximately 6.75 acres of land. Grading operations would increase the potential for erosion and sedimentation; if grading activities occur during the rainy season, or in the event of heavy storms, soils from the site could be entrained, eroded, and transported off-site.

As detailed in Section 4.9, *Hydrology and Water Quality*, construction projects of one or more acres are subject to the requirements of the Construction Stormwater General Permit, which requires preparation and implementation of a SWPPP to control the discharges of pollutants, including sediment, into local surface water drainages. Examples of BMPs that may be implemented during construction include the use of geotextiles and mats, temporary drains and swales, silt fences, and sediments traps. Erosion control practices may include the use of drainage controls such as down drains, detention ponds, filter berms, or infiltration pits; removal of any sediment tracked offsite within the same day that it is tracked; containment of polluted runoff onsite; use of plastic covering to minimize erosion from exposed areas; and restrictions on the washing of construction equipment.

In addition to the Construction Stormwater General Permit requirements, construction activities would be subject to the requirements of Chapter 15.09 of the City's Municipal Code which requires preparation of an erosion and sediment control plan in order to obtain a grading permit. The City accepts a SWPPP In lieu of an erosion control and sediment plan, if the SWPPP contains the requirements of the City's required elements of an erosion and sediment control plan. Accordingly, the SWPPP prepared for the proposed project would include information on proposed practices that would be used during construction to retain sediment on-site, minimize erosion, and utilize vegetation for erosion control, as well as a summary of precautionary measures to be taken to ensure vehicle use does not result in erosion.

Nonetheless, soils on the project site are highly erodible. Implementation and maintenance of proper drainage and the stabilization of surface soils, particularly those disturbed during construction, by vegetation or other means during and following construction are necessary to reduce the potential of erosion damage. Construction impacts would be potentially significant and mitigation is required.

Operation

During project operation, runoff generated from storm events may transport sediment off-site and contribute to project site erosion and the loss of topsoil. However, permanent drainage improvements and operational BMPs would direct and control stormwater runoff to minimize erosion, as described below.

As detailed in Section 4.9, *Hydrology and Water Quality*, the proposed project would utilize LID to detain, retain, and treat runoff consistent with the requirements of the Central Coast RWQCB's *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region* and the County's *Stormwater Technical Guide for Low Impact Development*. Furthermore, the Phase II MS4 Permit requires that a SWQMP be prepared for projects that create and/or replace 5,000 or more square feet of impervious surface. SWQMPs specify the operational BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff.

The *Stormwater Control Plan* prepared for the proposed project (Appendix J) serves as the SWQMP and specifies LID BMPs proposed for the project. LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff. Proposed LID BMPs include a drainage basin which would function as both a filtration and detention basin, a vegetated swale, and permeable asphalt which would adequately handle runoff during operation consistent with the requirements of the Central Coast RWQCB. LID BMPs would control and reduce stormwater runoff on the project site and would reduce the potential for erosion. However, soils on the project site would remain highly erodible, and implementation of long-term maintenance activities to ensure proper drainage and the stabilization of surface soils are necessary to reduce the potential of erosion damage during operation. Therefore, operational impacts would be potentially significant and mitigation is required.

Mitigation Measures

Mitigation Measure GEO-1 (Refer to Impact GEO-2)

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 would reduce potential impacts involving soil erosion or loss of topsoil to a less than significant level throughout incorporation of drainage and grading recommendations into the project, which would ultimately reduce erosion on the project site.

Threshold 4: Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact GEO-6 PROJECT SITE SOILS ARE NON-EXPANSIVE. THE PROJECT WOULD HAVE NO IMPACT.

According to the *Revised Geotechnical Engineering Report Update*, project site soils are non-expansive (Appendix G). Therefore, the project would not create substantial direct or indirect risks to life or property due to expansive soils and the project would have no impact.

Mitigation Measures

No mitigation measures are required.

Threshold 5:	Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact GEO-7 THE PROJECT WOULD NOT REQUIRE THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS. THE PROJECT WOULD HAVE NO IMPACT.

As stated in Section 2, *Project Description*, the project would include a new underground sewer line that would connect to an existing sewer line located underneath South Kellogg Avenue. Sewer services at the project site would be provided by the Goleta Sanitary District. As the project would connect to the existing municipal waste disposal system, and would not require the use of septic tanks or alternative wastewater disposal systems, this project would have no impact.

Mitigation Measures

No mitigation measures are required.

Threshold 6:	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-8 PROJECT GRADING WOULD OCCASIONALLY EXTEND BEYOND FILL SOILS THAT UNDERLIE THE PROJECT SITE. HOWEVER, THE GEOLOGIC UNIT THAT UNDERLIES THE PROJECT SITE HAS A LOW PALEONTOLOGICAL SENSITIVITY. THEREFORE, THE PROJECT WOULD HAVE A LOW POTENTIAL TO DISTURB PALEONTOLOGICAL RESOURCES, AND THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

There are no documented paleontological resources on the project site. The project site is primarily underlain by fill soils that reach approximately 4 feet in depth (Appendix G). As indicated by cross-sections of grading plans for the project, project construction would result in the excavation of more than 4 feet of fill during over-excavation and bioretention basin and utility trench construction. However, the geologic unit that underlies the project site, Holocene and upper Pleistocene (Quaternary-era) alluvium and colluvium (Qac), has a low paleontological sensitivity. During the occurrences where project grading activities would extend beneath fill soils, the project would be unlikely to encounter previously unidentified paleontological resources. Thus, project construction would have a very low potential to encounter previously undisturbed paleontological resources. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.6.4 Cumulative Impacts

Cumulative projects proposed in and around Goleta would expose additional people and property to seismic and geologic hazards that are present in the region. The magnitude of geologic hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Any specific geologic hazards associated with each individual site would be limited to that site without affecting other areas. In addition, existing regulations, including compliance with CBC requirements, would reduce seismic and geologic hazards to acceptable levels. Seismic and geologic hazards would be addressed on a case-by-case basis and would not result in cumulatively considerable impacts. Cumulative geologic hazard impacts would be less than significant, and the project's contribution would not be cumulatively considerable.

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4.7 Greenhouse Gases

This section evaluates the potential impacts of greenhouse gas (GHG) emissions associated with the proposed project. Construction and operational GHG emissions associated with project buildout are calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1. GHG emissions and project consistency with applicable GHG reduction plans are analyzed. Refer to Section 4.9, *Hydrology and Water Quality*, for an analysis of inundation from future sea level rise on the project site.

4.7.1 Environmental Setting

Climate Change and Greenhouse Gases

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).[1]

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The IPCC expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatonnes of anthropogenic CO_2 was

[1] The Intergovernmental Panel on Climate Change's (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the Intergovernmental Panel on Climate Change's (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between the years 2010 through 2019 (IPCC 2021).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 33 degrees Celsius (°C) cooler (World Meteorological Organization 2023). However, since 1750, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by 47 percent, 156 percent, and 23 percent, respectively, primarily due to human activity (IPCC 2021). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

Greenhouse Gas Emissions Inventory

Global Emissions Inventory

In 2015, worldwide anthropogenic GHG emissions totaled 47,000 million metric ton (MMT) of CO_2e, which is a 43 percent increase from 1990 GHG levels. Specifically, 34,522 MMT of CO_2e of CO_2, 8,241 MMT of CO_2e of CH_4, 2,997 MMT of CO_2e of N_2O, and 1,001 MMT of CO_2e of fluorinated gases were emitted in 2015. The largest source of GHG emissions were energy production and use (includes fuels used by vehicles and buildings), which accounted for 75 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and six percent, respectively. Waste sources contributed for three percent. These sources account for approximately 96 percent (United States Environmental Protection Agency [EPA] 2022).

United States Emissions Inventory

United States GHG emissions were 6,343.2 MMT of CO_2e in 2022 or 5,489.0 MMT CO_2e after accounting for sequestration. Emissions increased by 0.2 percent from 2021 to 2022. The increase from 2021 to 2022 was driven by an increase in CO_2 emissions from fossil fuel combustion across most end-use sectors due in part to increased energy use from the continued rebound of economic activity after the height of the COVID-19 pandemic. In 2022, the energy sector (including transportation) accounted for 76.4 percent of nationwide GHG emissions while agriculture, industrial and waste accounted for approximately 23.6 percent of nationwide GHG emission (United States EPA 2024).

California Emissions Inventory

Based on a review of the California Air Resource Board (CARB) California Greenhouse Gas Inventory for the years between 2000-2021, California produced 381.3 MMT of CO_2e in 2021, which is 12.6 MMT of CO_2e higher than 2020 levels. The 2019 to 2020 decrease and the 2020 to 2021 increase in emissions is likely due in large part to the impacts of the COVID-19 pandemic. Emissions levels in 2020 are anomalous to the long-term trend, and the one-year increase from 2020 to 2021 should be considered in the broader context of the pandemic and subsequent economic recovery that took place over 2021. The major source of GHG emissions in California is the transportation sector, which comprises 38 percent of the state's total GHG emissions. The industrial sector is the second largest source, comprising 19 percent of the state's GHG emissions while electric power accounts for approximately 16 percent (CARB 2023). The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, the state of California achieved its 2020 GHG emission reduction target of reducing

emissions to 1990 levels as emissions fell below 431 MMT of CO_2e. The annual 2030 statewide target emissions level is 260 MMT of CO_2e (CARB 2017).

Local Emissions Inventory

The City of Goleta conducted a GHG emissions inventory in the City for 2007, which represents the baseline inventory, or existing conditions in the City. The inventory determined the City produced 325,532 metric tons (MT) of CO_2e, excluding stationary sources, which is equivalent to the annual GHG emissions generated by approximately 68,000 passenger vehicles. The major source of GHG emissions in the City are associated with transportation, which contributed 48 percent of the City's total GHG emissions, followed by building energy (electricity and natural gas use) at 44 percent (City of Goleta 2014).

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. The year 2022 was the sixth warmest year since global records began in 1880 at 0.86°C (1.55°F) above the 20th century average of 13.9°C (57.0°F). This value is 0.13°C (0.23°F) less than the record set in 2016 and it is only 0.02°C (0.04°F) higher than the last year's (2021) value, which now ranks as the seventh highest (National Oceanic and Atmospheric Administration 2023). Furthermore, several independently analyzed data records of global and regional and-surface air temperature obtained from station observations jointly indicate that land surface air temperature and sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014, 2018).

Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years. *California's Fourth Climate Change Assessment* (California Natural Resource Agency 2019) includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state and regionally specific climate change case studies. However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. A summary follows of some of the potential effects that climate change could generate in California.

Air Quality and Wildfires

Scientists project that the annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C in the next 50 years and by 3.1 to 4.9°C in the next century. Higher temperatures are conducive to air pollution formation and rising temperatures could therefore result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the state has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains (California Natural Resource Agency 2019). If higher temperatures continue to be accompanied by an

increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. With increasing temperatures, shifting weather patterns, longer dry seasons, and more dry fuel loads, the frequency of large wildfires and area burned is expected to increase (California Natural Resources Agency 2021).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). For example, the winter of 2022-2023 had severe storms and flooding from increased rainfall and snowmelt, which the California Department of Water Resources identified as "the latest example that California's climate is becoming more extreme" (California Department of Water Resources 2023). This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring snowpack in the western United States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts. The Sierra snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack. Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050 (California Natural Resource Agency 2019).

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding (California Natural Resource Agency 2019). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding. The rate of increase of global mean sea levels between 1993 to 2022, observed by satellites, is approximately 3.4 millimeters per year, double the twentieth century trend of 1.6 millimeters per year (World Meteorological Organization 2013; National Aeronautics and Space Administration 2023). Global mean sea levels in 2013 were about 0.23 meter higher than those of 1880 (National Oceanic and Atmospheric Administration 2022). Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea level rise ranging between 0.25 to 1.01 meters by 2100 with the sea level ranges dependent on a low, intermediate, or high GHG emissions scenario (IPCC 2021). A rise in sea levels could erode 31 to 67 percent of southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (California Natural Resource Agency 2019). Furthermore, increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has an over $51 billion annual agricultural industry that produces over a third of the country's vegetables and three-quarters of the country's fruits and nuts (California Department of Food and Agriculture 2022). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (California Natural Resource Agency 2019). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (California Climate Change Center 2006).

Ecosystems

Climate change and the potential resultant changes in weather patterns could have ecological effects on the global and local scales. Soil moisture is likely to decline in many regions due to higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage (Parmesan 2006; California Natural Resource Agency 2019).

4.7.2 Regulatory Setting

a. Federal Regulations

The United States Supreme Court determined in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) that the United States EPA has the authority to regulate motor vehicle GHG emissions under the federal Clean Air Act. The United States EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the Unites States EPA issued a Final Rule that established the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities.

In *Utility Air Regulatory Group v. Environmental Protection Agency* (134 Supreme Court 2427 [2014]), the United States Supreme Court held the United States EPA may not treat GHGs as an air pollutant for purposes of determining whether a source can be considered a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The Court also held that Prevention of Significant Deterioration permits otherwise required based on emissions of other pollutants may continue to require limitations on GHG emissions based on the application of Best Available Control Technology.

b. State Regulations

CARB is responsible for the coordination and oversight of state and local air pollution control programs in California. There are numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below. For more information on the Senate and Assembly Bills (AB), executive orders, building codes, and reports discussed below, and to view reports and research

referenced below, please refer to the following websites: https://www.energy.ca.gov/data-reports/reports/californias-fourth-climate-change-assessment, www.arb.ca.gov/cc/cc.htm, and https://www.dgs.ca.gov/BSC/Codes.

California Advanced Clean Cars Program

AB 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, the United States EPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles, beginning with the 2009 model year, which allows California to implement more stringent vehicle emission standards than those promulgated by the United States EPA. Pavley I regulates model years from 2009 to 2016 and Pavley II, now referred to as "Low Emission Vehicle III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the Low Emission Vehicle, Zero Emissions Vehicles, and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, the rules will be fully implemented, and new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011).

California Global Warming Solutions Act of 2006 (Assembly Bill 32 and Senate Bill 32)

The "California Global Warming Solutions Act of 2006," (AB 32), outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 MMT of CO_2e, which was achieved in 2016. CARB approved the Scoping Plan on December 11, 2008, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2008). Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since the Scoping Plan's approval.

The CARB approved the 2013 Scoping Plan update in May 2014. The update defined the CARB's climate change priorities for the next five years, set the groundwork to reach post-2020 statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the state's longer term GHG reduction strategies with other state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation, such as SB 1383 and SB 100 (discussed later). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments

adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of six MT of CO_2e by 2030 and two MT of CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level), but not for specific individual projects because they include all emissions sectors in the state (CARB 2017).

Assembly Bill 1279

AB 1279, "The California Climate Crisis Act," was passed on September 16, 2022, and declares the State would achieve net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. In addition, the bill states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045.

In response to the passage of AB 1279 and the identification of the 2045 GHG reduction target, CARB published the Final 2022 Climate Change Scoping Plan in November 2022 (CARB 2022). The 2022 Update builds upon the framework established by the 2008 Climate Change Scoping Plan and previous updates while identifying new, technologically feasible, cost-effective, and equity-focused path to achieve California's climate target. The 2022 Update includes policies to achieve a significant reduction in fossil fuel combustion, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands (NWL) to reduce emissions and sequester carbon, and the capture and storage of carbon.

The 2022 Update assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan, addresses recent legislation and direction from Governor Newsom, extends and expands upon these earlier plans, and implements a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045, as well as taking an additional step of adding carbon neutrality as a science-based guide for California's climate work. As stated in the 2022 Update, "The plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the state's NWL and using a variety of mechanical approaches" (CARB 2022). Specifically, the 2022 Update:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of NWL to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

In addition to reducing emissions from transportation, energy, and industrial sectors, the 2022 Update includes emissions and carbon sequestration in NWL and explores how NWL contribute to long-term climate goals. Under the Scoping Plan Scenario, California's 2030 emissions are anticipated to be 48 percent below 1990 levels, representing an acceleration of the current SB 32 target. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the accelerated 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet our GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology.

Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed in August 2008, enhances the state's ability to reach AB 32 goals by directing the CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations (MPOs) are required to adopt a Sustainable Communities Strategy (SCS), which allocates land uses in the MPO's Regional Transportation Plan (RTP). Qualified projects consistent with an approved SCS or Alternative Planning Strategy (categorized as "transit priority projects") can receive incentives to streamline California Environmental Quality Act (CEQA) processing.

On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Santa Barbara County Association of Governments (SBCAG) was assigned targets of a 13 percent reduction in per capita GHG emissions from passenger vehicles by 2020 and a 17 percent reduction in per capita GHG emissions from passenger vehicles by 2035. In the SBCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements. The SBCAG Connected 2050 Regional Transportation Plan/Sustainable Committee Strategy (RTP/SCS) (2021) would demonstrate that the SBCAG region would achieve its initial regional emissions reduction targets for the 2020 and 2035 target years.

Senate Bill 1383

Adopted in September 2016, SB 1383 (Lara, Chapter 395, Statutes of 2016) requires the CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. SB 1383 requires the strategy to achieve the following reduction targets by 2030:

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

SB 1383 also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with the CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Senate Bill 100

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the state's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Executive Order B-55-18

On September 10, 2018, the former Governor Brown issued Executive Order (EO) B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

California Building Standards Codes

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2022 Title 24 standards. The California Building Standards Code's energy-efficiency and green building standards are outlined below.

PART 6 – BUILDING ENERGY EFFICIENCY STANDARDS/ENERGY CODE

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC). The 2022 Title 24 standards are the applicable building energy efficiency standards for the proposed project because they became effective on January 1, 2023.

PART 11 – CALIFORNIA GREEN BUILDING STANDARDS

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The 2022 CALGreen includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen standards and may adopt additional amendments for stricter requirements.

California Integrated Waste Management Act (Assembly Bill 341)

The California Integrated Waste Management Act of 1989, as modified by AB 341 in 2011, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities and (2) diversion of 50 percent of all solid waste on and after January 1, 2000.

Executive Order N-79-20

On September 23, 2020, Governor Newsom issued EO N-79-20, which established the following new statewide goals:

- All new passenger cars and trucks sold in-state to be zero-emission by 2035;
- All medium- and heavy-duty vehicles in the state to be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and
- All off-road vehicles and equipment to be zero-emission by 2035 where feasible.

EO N-79-20 directs CARB, the Governor's Office of Business and Economic Development, the CEC, the California Department of Transportation, and other state agencies to take steps toward drafting regulations and strategies and leveraging agency resources toward achieving these goals.

The California Climate Crisis Act (Assembly Bill 1279)

AB 1279 was passed on September 16, 2022 and declares the state would achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045. In addition, achieve and maintain net negative greenhouse gas emissions and ensure that by 2045, statewide anthropogenic greenhouse gas emissions are reduced to at least 85% below the 1990 levels. The bill would require updates to the scoping plan (once every five years) to implement various policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies.

Clean Energy, Jobs, and Affordability Act of 2022 (Senate Bill 1020)

Adopted on September 16, 2022, SB 1020 creates clean electricity targets for eligible renewable energy resources and zero-carbon resources to supply 90 percent of retail sale electricity by 2035, 95 percent by 2040, 100 percent by 2045, and 100 percent of electricity procured to serve all state agencies by 2035. This bill shall not increase carbon emissions elsewhere in the western grid and shall not allow resource shuffling.

c. Local Regulations

SBCAG 2050 RTP/SCS

SBCAG adopted its 2050 RTP/SCS (titled Connected 2050) in August 2021. This plan shows how the region will achieve the required SB 375 targets and demonstrates the co-benefits of reducing criteria pollutants. The 2050 RTP/SCS explores the region's land use and travel patterns, accounts for the demographic growth that will force new demands on both and presents a vision for how they can work together to satisfy the goals important to the region while also meeting the State's greenhouse gas reduction targets. The 2050 RTP/SCS preferred scenario is a Transit-Oriented Development (TOD)/Infill plan in that it strives to accommodate future growth within existing urban areas along transit corridors. The intent of these proposed changes is to shorten trip distances and reduce vehicle miles traveled and emissions by; directly addressing regional jobs/housing imbalance by providing more housing on the jobs-rich South Coast and more jobs in the North County; and promoting more trips, both local and inter-city, by alternative transportation modes, including by foot, bike, or transit. The 2050 RTP/SCS meets and exceeds the California Air Resources Board -17 percent per capita targets for reduction of GHG emissions from passenger vehicles for target year 2035 (SBCAG 2021).

Goleta Climate Action Plan

Adopted in July of 2014, the City of Goleta's Climate Action Plan (CAP; Goleta 2014) sets a 2020 target to achieve an 11 percent reduction below 2007 community-wide emissions. The CAP also has a 2030 target that is derived based on the linear trajectory between the 2020 reduction target and the 2050 target established by Executive Order S-3- 05, which sets a 2030 target of 26 percent below 2020 levels. The CAP contains GHG reduction measures for building energy efficiency, renewable energy, on-road transportation use, water consumption, off-road transportation equipment, solid waste generation, and municipal measures to meet the GHG reduction targets. The following applicable measures include:

- **Renewable Energy**

  Policy RE-1: Continue Implementation of Ordinance Requiring Construction of Solar Ready Buildings

- **On-Road Transportation and Land Use**

  Policy T-8: Encourage Bicycle Parking through Development of Design Guidelines and Policies.

Goleta General Plan/Coastal Land Use Plan

The Goleta General Plan/Coastal Land Use Plan (2006) is the primary means for guiding future change in Goleta as it faces difficult choices on a daily basis about growth, housing, environmental protection, neighborhood compatibility and preservation, and transportation. Goals and policies that are applicable to the proposed project to reduce GHG emissions include:

- **Conservation Element**

  Policy TE-15.3: Water Conservation for New Development.

  In order to minimize water use, all new development shall use low water use plumbing fixtures, water-conserving landscaping, low flow irrigation, and reclaimed water for exterior landscaping, where appropriate.

- **Transportation Element**

  Policy TE-1.1: Alternative Modes.

  The City's intent shall be to achieve a realistic and cost-effective balance between travel modes, including bikeways, pedestrian circulation, and bus transit. The City shall encourage the use of alternative modes of transportation, such as bus transit, bicycling, and walking, which have the additional beneficial effect of reducing consumption of non-renewable energy sources.

4.7.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Calculations of CO_2, CH_4, and N_2O emissions are provided to identify the magnitude of potential project effects related to GHG emissions. The analysis focuses on CO_2, CH_4, and N_2O because these comprise 98 percent of all GHG emissions by volume and are the GHG emissions the proposed project would emit in the largest quantities (IPCC 2014). Emissions of all GHGs are converted into their equivalent GWP in terms of CO_2 (i.e., CO_2e). Minimal amounts of other GHGs (such as

chlorofluorocarbons [CFCs]) would be emitted; however, these other GHG emissions would not substantially add to the total. GHG emissions associated with project construction and operational activity were calculated using the CalEEMod version 2022.1 (see Appendix C for calculations).

Construction

During construction, the proposed project would generate GHG emissions primarily from the use of internal combustion engines to power on-site equipment as well as off-site transportation of workers and materials. CalEEMod quantifies the default number of construction worker one-way trips per day by multiplying 2.5 times the number of pieces of equipment for all phases except building construction and architectural coating. For the building construction phase, the number of workers is derived from a study conducted by the Sacramento Metropolitan Air Quality Management District that determined the number of workers needed for various types of land uses and corresponding project size (this study and its analysis are included in Appendix D of the CalEEMod User Guide). For the architectural coating phase, the number of worker trips is approximately 20 percent of the number of worker trips needed during the building construction phase. Default trip length estimates for workers and vendors are based on the 2015 California Statewide Travel Demand Model (CSTDM) and regional travel demand models from local metropolitan planning organizations (California Air Pollution Control Officers Association 2022). Further detail for the assumptions included in the modeling of GHG emissions is provided in Section 4.2, *Air Quality*. Construction emissions occur for a limited period of a project's lifetime, as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime. The project's GHG construction emissions are amortized for the lifetime of the project, which is 50 years based on applicant provided information.

Operation

During operation, the proposed project would generate GHG emissions from area sources, energy use, mobile, water use, and waste disposal. Further detail for the assumptions included in the modeling of GHG emissions is provided in Section 4.2, *Air Quality*. Assumptions used for the estimation of GHG emissions that are not applicable to criteria pollutant emissions, and therefore not included in the methodology of Section 4.2, *Air Quality*, are detailed below:

- The project's CalEEMod model uses default CalEEMod assumptions for energy and solid waste sources for the industrial warehouse building and parking lot land uses.
- As required by a project-specific Condition of Approval, the project would not include cold storage; therefore, the CalEEMod default equipment is removed from the analysis.
- The project would consume natural gas only for the office space portion of the warehouse for heating, ventilating and air conditioning. Natural gas assumptions from CalEEMod for general office land use were utilized, and natural gas assumptions for unrefrigerated warehouse were converted into electricity consumption.
- The project would be supplied with 100 percent carbon free electricity by Central Coast Community Energy (3CE) prime option.
- The project's GHG emissions from construction of the proposed project were amortized over a 50-year period and added to annual operational emissions to determine the project's total annual GHG emissions.

The project would include nine parking spaces with electric vehicle (EV) chargers, which would reduce GHG emissions annually through encouraging the use of electric vehicles by employees over gasoline-

powered vehicles.[2] The calculations and assumptions for reducing GHG emissions from the proposed nine EV charging stations are included in Appendix C. The project site would be supplied with 100 percent carbon free electricity; therefore, CO_2e intensity factor for the 2028 buildout year would be approximately 0 pounds per megawatt-hour (lb/MWh). Based on CalEEMod default assumptions, gasoline-fueled cars would emit 229 grams of CO_2e per mile, and the average electric fuel economy for electric vehicles is 0.25 kilowatt-hour (kWh) per mile. It is assumed that electric vehicles would charge five hours a day with a Level 2 charging station, which charges at a rate of 25 miles per hour. Therefore, one EV charging station would reduce approximately 39,125 passenger vehicle miles traveled (VMT) annually.

Significance Thresholds

Appendix G of the CEQA Guidelines considers a project to have a significant impact related to greenhouse gas emissions if the project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

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

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

The City of Goleta has not adopted quantitative GHG emissions thresholds for land use development projects. The City adopted a CAP in 2014 that identified measures that would enable the City to meet the GHG reduction target for 2020 consistent with AB 32. However, the CAP does not establish a pathway to achieving the State's goal for 2030. Therefore, the CAP does not qualify as a GHG reduction plan for projects with horizon years beyond 2020.

On August 27, 2024, Santa Barbara County adopted the 2030 CAP to reduce greenhouse gas emissions 50 percent below 2018 levels by 2030. The 2030 CAP is a qualified GHG emission reduction plan consistent with CEQA Guidelines Section 15183.5. The 2030 CAP includes measures that are applicable to existing developments and municipal government operations, as well as mandatory measures to be applied to future development for public and private projects and plans. The 2030

[2] The proposed project would be required to comply with the City of Goleta's EV Reach Code for new construction, which was adopted by the City Council on September 17, 2024. The EV Reach Code would require the proposed project to provide a minimum of 57 EV-capable parking spaces with 19 parking spaces including electric vehicle supply equipment. The greenhouse gas emissions analysis assumes that the project would include 9 EV spaces, and therefore presents a conservative analysis.

CAP contains a GHG checklist to assess if a project includes GHG reduction measures in line with the 2030 CAP to achieve statewide reduction targets. In addition, if a project does not meet the GHG checklist measures, the County's Environmental Thresholds and Guidelines Manual includes three GHG efficiency thresholds per capita for new developments to meet statewide targets. The County's Environmental Thresholds and Guidelines Manual GHG efficiency threshold for a nonresidential use is 2.63 MT of CO_2e per employee per year. This target is in line with the State's goal of reducing statewide emissions under SB 32 and contribute its fair share of the statewide goal of carbon neutrality by 2045 (County of Santa Barbara 2024).

The City of Goleta is located in Santa Barbara County, and thresholds deemed applicable in Santa Barbara County would also reasonably apply to projects within the City of Goleta. The City has consistently relied on these standards as the methodology for establishing a threshold for analyzing the potential greenhouse gas impacts of a project. While the project would include some 2030 CAP checklist measures, such as including 100 percent carbon-free electricity supplied by 3CE Prime option and electrifying 50 percent of off-road landscaping equipment, it would include some design features outside the GHG checklist, such as natural gas lines. Therefore, this analysis uses the County's Environmental Thresholds and Guidelines Manual GHG efficiency threshold for a nonresidential use of 2.63 MT of CO_2e per employee per year to determine potential significance of project GHG emissions. In addition, the proposed project is evaluated based on consistency with the 2022 Scoping Plan, SBCAG 2050 RTP/SCS, City of Goleta General Plan/Coastal Land Use Plan, and City of Goleta CAP for the purposes of reducing GHG emissions and mitigating the effects of climate change.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1 THE PROPOSED PROJECT WOULD NOT GENERATE TEMPORARY AND LONG-TERM INCREASES IN GREENHOUSE GAS EMISSIONS THAT WOULD EXCEED THE COUNTY'S NONRESIDENTIAL GHG EFFICIENCY THRESHOLD OF 2.63 METRIC TONS OF CARBON DIOXIDE EQUIVALENT PER EMPLOYEE PER YEAR. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Construction and operation of the project would generate GHG emissions. This analysis considers the combined impact of GHG emissions from both construction and operation. Calculations of CO_2, CH_4, and N_2O emissions are provided to identify the magnitude of potential project effects.

Construction Emissions

Project construction would generate temporary GHG emissions from operation of construction equipment on-site, and vehicles transporting construction workers to and from the project site and heavy trucks to transport soil import, building, concrete, and asphalt materials. As shown in Table 4.7-1, construction associated with the project would generate 599 MT of CO_2e. Amortized over a 50-year period, construction associated with the project would generate 12 MT of CO_2e per year.

Table 4.7-1 Construction GHG Emissions

Year	Emissions (MT of CO_2e)
2027	268
2028	205
Pipeline	126
Total	**599**
Amortized over 50 years	**12**

MT = metric tons; CO_2e = carbon dioxide equivalents

Source: CalEEMod worksheets in Appendix C. See Table 2.1 "Overall Construction-Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

GHG emissions from worker trips to and from the site would be approximately 0.4 MT of CO_2e per year when amortized over the project life, based on Table 3.1 to Table 3.14 of Appendix C. In other words, construction worker trips would represent less than four percent of the total construction emissions. Therefore, GHG emissions from worker trips during construction activity would be minimal.

Operational and Total Project Emissions

Operation of the project would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips (employee and warehousing activities), and wastewater and solid waste generation. The implementation of nine EV charging stations would reduce gasoline GHG emissions per year, as shown in Table 4.7-2. Approximately 352,125 VMT per year would be reduced from the nine EV charging stations. The proposed project's gasoline GHG emissions would be approximately 81 MT of CO_2e per year[3] (based on employee and warehousing activities); the GHG emissions from electric vehicles would be approximately 0 MT of CO_2e per year, since the project would be supplied with 100 percent carbon free electricity from the 3CE Prime option. Therefore, installing nine parking spaces with EV charging stations would reduce mobile GHG emissions by 81 MT of CO_2e per year. Annual operational emissions resulting from the project are summarized in Table 4.7-2. The annual operational GHG emissions are combined with the amortized construction emissions. The proposed project would emit approximately 133 MT of CO_2e per year or 1.77 MT of CO_2e per employee per year; therefore, the project would not exceed Santa Barbara County's Environmental Thresholds and Guidelines Manual GHG efficiency threshold for a nonresidential use of 2.63 MT CO_2e per employee per year.[4] Therefore, GHG impacts would be less than significant.

[3] GHG emissions from gasoline vehicles = (352,125 reduced VMT per year*229 grams of CO_2e per mile*1^{-6} MT per gram)
[4] It is anticipated the project would generate approximately 75 new employees.

Table 4.7-2 Combined Unmitigated Annual GHG Emissions

Emission Source	Annual Emissions (MT CO_2e)
Construction[1]	**12**
Operational	**121**
Area	1
Energy	7
Mobile	156
EV Charging Stations	(81)
Solid Waste	21
Water, Wastewater	17
Total	**133**
Total GHG per Service Population[2]	**1.77**
Santa Barbara County GHG Service Population Criterion for Nonresidential Land Uses	2.63 MT of CO_2e per service population per year
Exceed Threshold?	**No**

MT CO_2e = metric tons of carbon dioxide equivalent.

Note: parenthetical values are negative numbers and are subtracted from the total emissions rather than added.

Source: CalEEMod worksheets and EV charging station worksheets are in Appendix C. See Table 2.6 "Operations Emissions by Sector, Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

[1]Construction emissions were amortized by 50 year project lifetime.

[2]The project would add approximately 75 employees.

Mitigation Measures

No mitigation measures are required.

Threshold 2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH THE CALIFORNIA AIR RESOURCES BOARD 2022 SCOPING PLAN, SANTA BARBARA COUNTY ASSOCIATION OF GOVERNMENTS 2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY, CITY OF GOLETA GENERAL PLAN/COASTAL LAND USE PLAN, AND CITY OF GOLETA CLIMATE ACTION PLAN, WHICH AIM AT REDUCING GREENHOUSE GAS EMISSIONS. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Consistency with Applicable Plans and Policies

2022 Scoping Plan

The principal State GHG reduction plans and policies are AB 32, the California Global Warming Solutions Act of 2006, and the subsequent legislation, SB 32 and AB 1279. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. The goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, the State passed AB 1279, which declares the State would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent

below 1990 levels by 2045. The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the state's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The Scoping Plan's Appendix D, Local Actions, provides suggestions for prioritizing the various types of mitigation, starting with on-site GHG-reducing design features and mitigation measures, such as methods to reduce VMT and support building decarbonization, access to shared mobility services or transit, and EV charging. It does not address other land use types such as industrial. The Scoping Plan's Transportation Electrification priority area supports an EV fleet, which the proposed project would allocate at least nine EV charging stations, and would be served by 3CE , which would supply 100 percent carbon free electricity to the project site and would be consistent with SB 100 targets. The Scoping Plan's VMT Reduction priority area supports increased access to public transit and walking, development located on infill sites, and development that does not result in the loss or conversion of natural and working lands. The project is an infill development in an urban area that would not convert natural lands and would contribute to the job and housing balance. The City anticipates residential and work-based projects in these areas would generate low VMT because of the higher density of existing residential and commercial uses and increased transit access relative to other areas of the City. These features allow for shorter vehicle trip lengths and promote the use of alternative transportation in these areas. In addition, the project site would implement ten bicycle parking spaces to promote alternative modes of transportation. The proposed project would be consistent with the State's long-term climate goals of carbon neutrality by 2045.

SBCAG 2050 RTP/SCS

SBCAG has incorporated a sustainable community strategy into its RTP/SCS, which is designed to help the region achieve its SB 375 GHG emissions reduction target. The SBCAG 2050 RTP/SCS demonstrates that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years. The Environment Objective 1 of the RTP/SCS is to "promote better balance of jobs and housing to reduce long-distance commuting" (SBCAG 2021). The project would site new jobs within close proximity to residents within the urban boundary of Goleta and therefore would be consistent with Objective 1. Furthermore, in support of Environment Objective 5 of "reduce vehicle miles traveled," the surrounding area is anticipated to generate low VTM VMT because of the higher density of existing residential and commercial uses and increased transit access near the proposed project. Therefore, these features would allow for shorter vehicle trip lengths and promote alternative modes of transportation, such as bicycling and transit.

City of Goleta General Plan

In October 2006, the City of Goleta adopted the Goleta General Plan/Coastal Land Use Plan (General Plan) to provide the city with a consistent framework for land use decisions. The General Plan includes the State-required elements, and a conservation element that promotes energy efficiency strategies to reduce GHG emissions. The General Plan addresses recently emerging topics of climate change and alternative energy. The general plan lists several policies as part of its Transportation and Conservation Element that support GHG emission reductions. The proposed project would be consistent with the goals and policies stated under Section 4.7.2, *Regulatory Setting,* pertinent to GHG emission reduction. The proposed project would be consistent with Policy CE-15.3 of the Conservation Element by incorporating water efficient fixtures to reduce water consumption for landscaping, plumbing, and irrigation consistent with the latest Title 24 Green Building Code and Building Energy

Efficiency Standards. In addition, the project would be consistent with the City's Policy TE-1.1, Alternative Modes, by incorporating ten bicycle parking spaces, which could promote alternative modes of transportation for workers within half a mile of the project site.. Therefore, the project would be consistent with the goals and policies in the City of Goleta General plan to increase water efficiency, and potentially reduce the amount of motor trips with connectivity to surrounding neighboring residents.

City of Goleta Climate Action Plan

The City's CAP is a long-range plan to reduce GHG emissions from city government operations and community activities within Goleta. In addition, contains policies and programs targeting energy efficiency policy. The CAP ensures that Goleta does its part to contribute to the goals of California's AB 32 and its successor legislation, SB 32. The proposed project would be consistent with the CAP measures under Section 4.7.2, *Regulatory Setting*. The project building would be designed and equipped with features that conserve and reduce energy consumption. The project would be consistent with the latest Title 24 Building Energy Efficiency Standards for solar readiness for nonresidential land uses, which would align with Policy RE-1. In addition, the project would construct ten bicycle parking spaces, which could promote alternative modes of transportation with several residential uses within half a mile of the project site. The addition of bicycle parking spaces on the project site is aligned with Policy T-8 of City's Climate Action Plan. The proposed project would be consistent with the goals outlined in the CAP.

Conclusion

The plan consistency analysis provided above demonstrates that the project complies with the plans, policies, regulations and GHG reduction actions/strategies outlined in 2022 Scoping Plan, SBCAG's 2050 RTP/SCS, City of Goleta General Plan, and City of Goleta CAP. Consistency with the above plans, policies, and GHG reduction measures would ensure that the project's incremental contribution of GHG emissions would not inhibit the ability of the state to meet its GHG reduction goals. Therefore, the project would not conflict with any applicable plans, policies, and measures an agency adopted for the purpose of reducing emissions of GHG emissions. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.7.4 Cumulative Impacts

GHG and climate change are, by definition, cumulative impacts. The geographic scope for considering cumulative impacts related to GHG emissions is the state of California. Although GHG emissions have worldwide repercussions, the contribution of the project to the impact is addressed in light of the goals for reducing statewide emissions.

Statewide GHG emissions are an existing significant cumulative impact. As such, the state has established the following statewide emissions reductions targets:

- By 2020, reduce GHG emissions to 1990 levels.
- By 2030, reduce GHG emissions to 40 percent below 1990 levels.
- By 2045, reduce GHG emissions to 85 percent below 1990 levels.

GHG impacts are assessed in a cumulative context since no single project can cause a discernible change to the climate. Therefore, cumulative significance is based on the same thresholds as the proposed project. In the absence of an adopted numeric threshold for the City of Goleta, the significance of the project's GHG emissions is evaluated on the County's Environmental Thresholds and Guidelines Manual GHG efficiency threshold for a nonresidential use of 2.63 MT of CO_2e per employee per year. In addition, consistency with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the 2022 Scoping Plan, 2050 MTPRTP/SCS, City of Goleta General Plan and CAP.

As discussed in Impact GHG-1, project GHG emissions would not exceed the County's Environmental Thresholds and Guidelines Manual GHG efficiency threshold for a nonresidential use of 2.63 MT of CO_2e per employee per year. The project would generate 1.77 MT of CO_2e per employee year. As discussed in Impact GHG-2, the proposed project would be consistent with the statewide, regional, and local plans by including energy and water conservation measures, and solar readiness consistent with the latest Title 24 Building Energy Efficiency Standards (Part 6) and Green Building Standards (Part 11). In addition, the project would be supplied with 100 percent carbon free electricity from 3CE Prime option. Furthermore, the proposed project would be an infill development that would not convert natural lands and would contribute to the job and housing balance. The project site would implement ten bicycle parking spaces, which would promote alternative modes of transportation that would have the effect of reducing VMT, and therefore would reduce mobile GHG emissions. Therefore, the proposed project would be consistent with the State, regional, and local plans. Thus, based on the *CEQA Guidelines* for determining the significance of GHG emissions, while cumulative impacts are significant, the proposed project's contribution would not be considerable.

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4.8 Hazards and Hazardous Materials

This section addresses risks associated with hazardous materials, including the potential presence of and risk of upset and exposure from hazardous materials at the project site and the potential risk of airport hazards at the project site. The background information and analysis in this section is based partially on the *Phase I Environmental Site Assessment* (Phase I ESA) prepared for the project by Rincon Consultants, Inc. in February 2023, which is included as Appendix I, and the *Results of Environmental Soils Analysis* prepared for the project by Earth Systems, which is included in Appendix O.

4.8.1 Environmental Setting

a. Overview of Project Site

Historically, the project site was used for agricultural production, until the construction of the drive-in movie theater in 1967. Currently, the project site is developed with the inactive drive-in movie theater and public market with a concession building and smaller associated structures.

Historical Land Uses of the Project Site and Adjacent Sites

As part of the Phase I ESA, historic aerial photographs and topographic maps of the project site were reviewed. This review of past records demonstrated that the project site has been historically used for agricultural purposes, before the construction of the drive-in movie theater in 1967.

The project site was recorded as vacant/undeveloped from 1928 to 1947. After 1947, part of the project site was used for agricultural use (dry farming), before the project site reverted to undeveloped land in 1950. From 1950 through 1954, the project site continued to be undeveloped; after 1954, agricultural use on the project site resumed, in the form of row crops. In 1967, a drive-in movie theater with three buildings and a freestanding screen was constructed on the project site. In 1992, the Santa Barbara Swap Meet began to occur on the project site; and in 2010, the Goleta Public Market also began to occur on the project site. The project site currently contains the inactive movie theater and inactive public market, with an associated concessions stand and smaller structures.

The project site is adjacent to roadways, open space land uses, and industrial land uses, several of which have handled or generated hazardous materials historically. Residential properties are located beyond SR 217 to the east of the project site and a few are located to the west of the site in the Corta and Placencia Streets neighborhood. Industrial uses are located to the north and west of the project site. Tidal wetland and stormwater infrastructure are located to the south, undeveloped land with existing trees and shrubs are located approximately 30 feet to the southwest, and undeveloped land with existing trees and shrubs approximately 260 feet away to the northwest of the project site.

Table 4.8-1 lists historical uses of adjacent properties that have the potential to result in soil or groundwater contamination on the project site, based on a review of aerial photographs, topographic maps, fire insurance maps, city directories, and building permits conducted as part of the Phase I ESA.

Table 4.8-1 Historic Land Uses of Adjacent Properties of Potential Concern

Site Address	Distance to Project Site	Historical Land Use and Year(s) of Operation
873 South Kellogg Avenue	Approximately 60 feet north	Automotive repair (1972) Industrial finishing facility (1986-2017)
879 South Kellogg Avenue	Approximately 40 feet north	Automotive repair (2005-2017) Sheet metal and heating facility (2010)
891 South Kellogg Avenue	Approximately 100 feet north	Automotive salvage/recycling facility (1992-2017) Automotive repair (2014, 2017)
905 South Kellogg Avenue	Immediately north; adjacent to project site	Automotive repair (1981-2017)

Source: Phase I ESA, Appendix I

Current Project Site Conditions

As part of the Phase I ESA (Appendix I), site reconnaissance was conducted in order to observe existing project site conditions and to obtain information indicating the possible presence of recognized environmental conditions (REC). During the site reconnaissance, Rincon Consultants, Inc. did not observe any of the following on-site: aboveground storage tanks (ASTs) or evidence of underground storage tanks (USTs); odors; pools of liquid; drains, clarifiers, or sumps; degreasers/parts washers; pits, ponds, and lagoons; stressed vegetation; wastewater; septic systems/effluent disposal systems; soils piles; or fill material. On the northwestern side of the concession building, Rincon observed containers of floor finish and spray paint; containers of tractor hydraulic fluid, gear/transmission oil, chlorinating tablets, and waste oil; two unlabeled five-gallon containers; one pad-mounted transformer; and dark-stained asphalt beneath and surrounding this area of stored hazardous substances and petroleum products. Several plastic 55-gallon drums for trash disposal were observed throughout the project site. On the southeastern portion of the project site, Rincon observed two dewatering wells with sump pumps. Heating/cooling equipment was observed in one of the on-site projection buildings, and solid waste/debris was observed throughout the project site, including an abandoned recreational vehicle, dumped fridge, tires, bags of mulch and asphalt patch, and rubber traffic cone bases.

As a follow-up to the database search and the site reconnaissance, the Phase I ESA reviewed the following reports, provided by the City of Goleta:

- *Environmental Lien and AUL Search* prepared by Environmental Data Resources in January 2023 –based on a review of this report, no environmental liens or Activity/Use Limitation reports (AULs) were identified in connection with the project site.
- *Geotechnical Engineering Report Update* prepared by Earth Systems Pacific in August 2022—based on a review of this report, fill soils on the project site were encountered to depths of approximately 4 feet below ground surface. Additionally, groundwater was reported to be encountered at depths ranging from 3 to 7.5 feet below ground surface. This report recommended the removal of any existing fill soils, and replacement with compacted fill in the proposal building and surface improvement areas.
- *Preliminary Title Report* prepared by Chicago Title Company in June 2022—based on a review of this report, the title to the project site is vested in Goleta Gardens LLC and easements for public utilities, roads, and an airport clear zone are located on the project site.

The Environmental Soils Analysis (Appendix O) was conducted in August 2023 and included sampling, screening, and laboratory analysis of soils on the project site. The results of the laboratory analyses were compared to regulatory environmental screening levels, for commercial/industrial land use. These environmental screening levels have been established by the Department of Toxic Substance Control (DTSC) and are based on potential health effects that consider potential exposure levels during commercial/industrial land use construction and operation. Project site soil samples did not exceed the regulatory thresholds for commercial/industrial land use for total petroleum hydrocarbons, volatile organic compounds (VOCs) or semi-VOCs, metals, organochlorine pesticides, and polychlorinated biphenyls (Appendix O).

Arsenic was detected in all soil samples at concentrations ranging from 1.55 to 4.23 milligrams per kilogram (mg/kg), which exceeded the environmental screening levels of 4.2 mg/kg. However, the DTSC notes that background concentrations of arsenic in soil often exceed risk-based screening-level concentrations and assessments should eliminate from consideration those whose range of concentrations fall within the range of local ambient conditions. In a study of a large data set from sites throughout southern California, arsenic soil concentrations ranged from 0.15 to 19.6 mg/kg, with an upper-bound 95 percent confidence level concentration of 12 mg/kg. As such, the DTSC states that the upper tolerance limit for arsenic concentration, consistent with statistical evaluations, supports an estimate of 12 mg/kg as a 95 percent upper confidence limit of mean ambient arsenic concentrations. The detected concentrations of arsenic in project site soils are below this alternate threshold of 12 mg/kg and are well within the statistically determined 95 percent upper confidence limit for ambient arsenic concentrations. Therefore, the *Environmental Soils Analysis* concluded that arsenic represents background concentrations and does not constitute a contaminant of concern (Appendix O). The concentrations of arsenic detected in project site soil samples are consistent with background concentrations and are not indicative of elevated arsenic in project site soils.

While the soil samples did not exceed regulatory thresholds for petroleum hydrocarbons or volatile organic compounds, the *Environmental Soils Analysis* noted that the ground surface to the west of the existing concession stand, an area approximately 15 feet in diameter, was visibly stained and emitted a moderately strong hydrocarbon odor. Petroleum hydrocarbons detected in this location were only detected in the shallow 6-inch sample and not detected in the 24-inch sample; therefore, the impacted soils are not considered to be laterally or vertically extensive. Because samples from 6 inches below ground surface at this location were below the environmental screening levels for total petroleum hydrocarbons, VOCs, and semi-VOCs, the *Environmental Soils Analysis* concluded that the contamination at this location is limited to the upper few inches of soil. Therefore, it is possible that if sampling been conducted at the surface or at a shallower depth, results would be above the environmental screening levels for these contaminants.

b. Known Hazardous Materials Sites

The term “hazardous material” refers to both hazardous substances and hazardous waste. A material is identified as “hazardous” if it appears on a list of hazardous materials prepared by a federal, State, or local regulatory agency or if it has characteristics defined as hazardous by such an agency. A “hazardous waste” is a “solid waste” that exhibits toxic or hazardous characteristics. The United States Environmental Protection Agency (U.S. EPA) defines the term “solid waste” to include many types of discarded materials including any gaseous, liquid, semi-liquid, or solid material, which is discarded or has served its intended purpose, unless the material is specifically excluded from regulation. Such materials are considered waste whether they are discarded, reused, recycled, or reclaimed. U.S. EPA

classifies a material as hazardous if it has one or more of the following characteristics at specific thresholds: ignitability, corrosivity, reactivity, and/or toxicity.

As part of the Phase I ESA, a regulatory database search was conducted on December 28, 2022, to identify hazardous waste sites on and within one-eighth mile of the project site (Appendix I). The project site was listed on the Hazardous Waste Tracking System (HWTS) and HAZNET[1] databases as AmericanStar Transportation, City of Goleta, Goleta Public Market at 907 South Kellogg Avenue. These listings indicate that hazardous materials are currently or were previously handled and stored on-site; however, no releases have been reported. Additionally, several other off-site facilities and properties were to determined to be of potential environmental concern, based on the following factors:

- Reported distance of the facility from the project site;
- The nature of the database on which the facility is listed, and/or whether the facility was listed on a database reporting unauthorized releases of hazardous materials, petroleum products, or hazardous wastes;
- Reported case type (e.g., soil only, failed underground storage tank [UST] test only);
- Reported substance released (e.g., chlorinated solvents, gasoline, metals);
- Reported regulatory agency status (e.g., case closed, "no further action"); and,
- Location of the facility with respect to the reported groundwater flow direction.

Table 4.8-2 summarizes characteristics of hazardous material sites determined in the Phase I ESA to be of potential environmental concern, both on the project site and within the one-eighth-mile vicinity. For more detailed information regarding these hazardous materials sites, please refer to Appendix. In addition to these sites, in 2011, the City approved a concrete and asphalt recycling and crushing center at 909 South Kellogg Avenue, approximately 230 feet northwest of the project site (City of Goleta 2019). This center is anticipated to commence operation by the Spring of 2024.

Table 4.8-2 Hazardous Material Sites of Potential Environmental Concern

Site Name	Site Address	Relation to Project Site	Potential Concern/Contaminants
AmericanStar Transportation, City of Goleta, Goleta Public Market	907 South Kellogg Avenue	On project site.	Previous storage and handling of pesticides
Garcia's Auto Repair, National Autobody[1]	905 South Kellogg Avenue	Immediately north; adjacent to project site	Current or previous storage and handling of total petroleum hydrocarbons (TPH)
Santa Barbara Industrial Finishing[1]	873 South Kellogg Avenue	Approximately 60 feet north	Current or previous storage and handling of TPH
Santa Barbara Auto Salvage/Steelhead Recyclers	891 South Kellogg Avenue	Approximately 100 feet north	Potential hazardous material impacts to project site soil, soil vapor, or groundwater due to TPH, metals, and lead

[1] A California Department of Toxic Substances Control database that records annual hazardous waste shipments.

Site Name	Site Address	Relation to Project Site	Potential Concern/Contaminants
Hertz Service Center	5919 Corta Street	Approximately 170 feet west	Potential hazardous material impacts to groundwater and soils in project site vicinity due to TPH, lead, and volatile organic compounds (VOCs)
Channel Industries	839 Ward Drive	Approximately 500 feet northeast	Potential hazardous material impacts to groundwater and soils in project site vicinity due to VOCs and metals
Santa Barbara Airbus	750 Technology Drive	Approximately 570 feet north	Potential hazardous material impacts from past release of hazardous substances, contaminants unknown

[1] The databases on which this facility is listed are not indicative of a hazardous materials release; however, they indicate that hazardous materials are currently/were previously handled and stored onsite.

Source: Appendix I

c. Recognized Environmental Conditions

A recognized environmental condition (REC) is defined by American Society for Testing and Materials (ASTM) E1527-21 as:

(1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; or

(2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or

(3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment."

As stated in ASTM-E1527-21, "likely" pertains to:

> "that which is neither certain nor proved, but can be expected or believed by a reasonable observer based on the logic and/or experience of the environmental professional, and/or available evidence, as stated in the report to support the opinions given therein."

The Phase I ESA found evidence of two RECs in connection with the project site: former agricultural use of the project site, and fill soils from an unknown source on the project site. Each of these RECs are discussed in the following subsections.

Former Agricultural Use of Project Site

According to the historical resources reviewed, the project site appears to have been used for agricultural purposes from at least 1947 to 1954 (dry farming in at least 1947 and row crops in at least 1954). Agricultural land use, with the exception of dry farming, is typically associated with the use of pesticides and arsenic. Therefore, the former agricultural use of the project site is considered a REC (Appendix I).

Fill Soils on Project Site

According to the 2022 *Geotechnical Engineering Report Update* prepared for the project site, the project site is underlain by approximately 4 feet of fill soils. Based on the unknown origin of the fill

soils, the on-site fill soils are considered an REC (Appendix I). As discussed previously, soil samples collected on the project site did not exceed regulatory thresholds for hydrocarbon or other contamination. However, the *Environmental Soils Analysis* noted that the ground surface to the west of the existing concession stand was visibly stained and emitted a moderately strong hydrocarbon odor.

Asbestos and Lead

The existing buildings on the project site were constructed in approximately 1967, and consequently, asbestos-containing materials (ACMs) and lead-based paints (LBPs) may be present in structures on the project site according to the Phase I ESA (Appendix I).

d. Airport Safety Hazards

The Santa Barbara Municipal Airport is located approximately 0.25-mile west of the project site. The Santa Barbara Municipal Airport provides commercial and general aviation access to the national air transportation system in support of business and leisure travel. Aircraft flight operations are regulated by the Federal Aviation Administration (FAA).

The primary hazard associated with land uses near the airport is the risk of aircraft incidents on approach and takeoff. According to the Santa Barbara County Airport Land Use Plan (ALUP) the project site is located within the Airport Influence Area, and specifically within Airport Safety Zone II of the Santa Barbara Airport, which includes safety restrictions and height limitations for development within the safety area. The northern half of the project site is located within Safety Area 1 (Clear Zone) which is the area beneath the airplane take off or landing path and is the most restrictive area because it is subject to the greatest airport hazard. The southern half of the project site is located within Safety Area 3 (General Traffic Pattern Zone), which is the area in which airport traffic patterns occur and has the least restrictive requirements. The ALUP development standard of a maximum intensity of 25 people per acre, as a site-wide average, would apply to the project (Airport Land Use Commission [ALUC] 1993).

According to the Santa Barbara County ALUP, the industrial use of the proposed project is not designated as a noise-sensitive land use. The project site is located within the 60-65 decibel Community Noise Equivalent Level (CNEL) contour, and the project's industrial operations would be compatible with this contour (ALUC 1993).

4.8.2 Regulatory Setting

a. Federal Regulations

Occupational Safety and Health Act

Created by the Occupational Safety and Health Act of 1970 (Title 29 CFR), Occupational Safety and Health Administration (OSHA) is the federal agency responsible for ensuring worker safety. OSHA regulations provide standards for safe workplaces and work practices, including those relating to hazardous materials handling.

Toxic Substances Control Act

The Toxic Substances Control Act was passed by the United States Congress in 1976 and is administered by the U.S. EPA to regulate the introduction of new or already existing chemicals. Under

the Toxic Substances Control Act, the U.S. EPA evaluates potential risks from new and existing chemicals and acts to address any unreasonable risks chemicals may have on human health and the environment. The Federal Toxic Substances Control Act provides U.S. EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 established a program administered by the U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

Comprehensive Environmental Response, Compensation and Liability Act

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) was enacted in 1980 and amended by the Superfund Amendments and Reauthorization Act in 1986. This law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants.

Process Safety Management Standard

The OSHA Process Safety Management Standard (29 CFR 1910.119) includes requirements for preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals for general industry and construction. Requirements include providing employees with information pertaining to hazardous chemicals, training employees on the operation of equipment with hazardous materials, and employer requirements to perform a process hazard analysis.

National Incident Management System

The National Incident Management System (NIMS) provides a systematic, proactive approach to guide government agencies, nongovernmental organizations, and the private sector to work together to prevent, report , recover from, and mitigate the effects of incidents, regardless of cause, size, location, or complexity, in order to reduce the loss of life and property harm to the environment.

Hazardous Materials Transportation Uniform Safety Act

The U.S. Department of Transportation regulates hazardous materials transportation on all interstate roads pursuant to its authority under the Hazardous Materials Transportation Uniform Safety Act of 1990 (49 United States Code §5101 et seq.). In California, the California Department of Transportation (Caltrans) and California Highway Patrol enforce federal law. Together, these agencies determine driver training requirements, load labeling procedures, and container specifications.

Federal Air Regulations Part 77

Federal Air Regulations (FAR) Part 77 states that all applicants proposing any construction or alterations that may affect navigable airspace must file a Notice of Proposed Construction or Alteration (Form 7460-1) with the Federal Aviation Administration (FAA). This notice allows the FAA to conduct an initial screening determination for applicable projects. The initial screening determination from the FAA may state one of the following:

- The project is not identified as an obstruction and would not be a hazard to air navigation; or
- The project would be an obstruction unless reduced to a specified height and is presumed to be a hazard to air navigation pending further study.

If a proposed development is identified as a presumed hazard, the FAA may require further aeronautical study or allow the project to be revised to include a reduction in the height of the proposed improvements. After the FAA completes the additional aeronautical study, it will typically issue a Determination of Hazard to Air Navigation or a Determination of No Hazard to Air Navigation.

b. State Regulations

Hazardous Waste Control Law

The DTSC, a department of the California EPA, is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code. DTSC also administers the California Hazardous Waste Control Law (California Health and Safety Code §§ 25100, et seq.) to regulate hazardous wastes. While the Hazardous Waste Control Law is generally more stringent than RCRA, until the U.S. EPA approves the California program, both state and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the SWRCB, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included. If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations (CCR). Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

Cal OSHA Title 8

Pursuant to the requirements of OSHA Title 8, employers must develop site-specific Health and Safety Plans. Workers potentially exposed to hazardous materials in their workplace must be trained so that they are aware of the hazards and provided necessary protection from the hazardous materials.

Hazardous Waste Management

Waste that is toxic, corrosive, flammable, or reactive must be handled, stored, transported, and disposed of in accordance with the regulations in California Health and Safety Code, Division 20, Chapter 6.5 and CCR, Title 22, Division 4.5, which are more stringent than federal regulations.

Geologic Energy Management Division

State of California Geologic Energy Management Division (CalGEM, previously known as the Division of Oil, Gas, and Geothermal Resources Regulatory Program [DOGGR]), supervises the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells throughout the State. The regulatory program set forth by CalGEM for the management of these resources emphasizes the appropriate development of oil, natural gas, and geothermal resources in the State through sound engineering practices that protect the environment, prevent pollution, and ensure public safety.

California Coastal Act

The California Coastal Act, enacted in 1976, establishes procedures for the review of proposed developments in the Coastal Zone and policies for the protection of coastal resources and public access to the coastline. The project site is located in the Coastal Zone, therefore, the following Coastal Act regulation in the Public Resources Code pertains to the project:

> Section 30232: Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

c. Local Regulations

Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan

The Federal Emergency Management Agency (FEMA) requires local governments to prepare and maintain a Hazard Mitigation Plan. The County of Santa Barbara and cities of Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Barbara, Santa Maria, and Solvang, in coordination with the State of California Governor's Office of Emergency Services (CalOES) and FEMA, developed the 2017 Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan. This plan guides disaster preparedness in the county and cities and specifies the actions that the jurisdictions plan to follow to reduce vulnerability and exposure to hazards.

Santa Barbara County Airport Land Use Plan

ALUPs serve as tools for ALUCs to review land use or development plans within Airport Influence Areas. The basic function of ALUPs is to promote compatibility between airports and the land uses that surround them. With limited exception, California law requires preparation of ALUPs for each public-use and military airport in the state.

In Santa Barbara County, the ALUC function rests with the Santa Barbara County Association of Governments (SBCAG). Because the project application was deemed complete prior to approval of the January 2023 Santa Barbara Airport Land Use Compatibility Plan, the project is subject to the requirements of the previous 1993 Santa Barbara County ALUP (per Section 2.2.2[b] of the 2023 Airport Land Use Compatibility Plan). The Santa Barbara County ALUP is the fundamental tool used by the SBCAG, acting in its capacity as the Santa Barbara County ALUC, in fulfilling its purpose of promoting airport land use compatibility. Specifically, the ALUP provides for the orderly growth of the Santa Barbara Airport and the surrounding area, and safeguards the general welfare of the inhabitants within the vicinity of the Airport and the public in general. Additionally, the Santa Barbara County ALUP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of general plans and to landowners in their design of new development.

Goleta General Plan

According to the City of Goleta's Safety Element of the General Plan (2006), hazardous materials in Goleta are governed by regulations that require proper storage, handling, employee/public noticing, spill contingency planning, business management plans, and other emergency response measures necessary to ensure public safety and to minimize the risk of accidental releases or environmental impacts. In Goleta, the administering agencies are the Santa Barbara County Fire Prevention Division and the Santa Barbara County Office of Emergency Services. The City of Goleta's Safety Element outlines several goals and policies related to hazardous materials and facilities. Goals and polices that are relevant to the project include:

- **Goal SE 1: Safety in General.** Objective: To avoid siting of development or land use activities in hazardous areas, and where this is infeasible, require appropriate mitigation to lessen or minimize exposure to hazards.
- **Policy SE 1.6: Enforcement of Building Codes.** Enforcement of Building Codes. [GP] The City shall ensure through effective enforcement measures that all new construction in the city is built according to the adopted building and fire codes.
- **Goal SE 9: Airport-Related Hazards.** Objective: To minimize the risk of potential hazards associated with aircraft operations at the Santa Barbara Airport.
- **Policy SE 9.1: Clear Zone and Airport Approach Zone Regulations.** The City will maintain and enforce through appropriate zoning measures the Clear Zone and Airport Approach Zone regulations pursuant to the plans and policies of the Santa Barbara County ALUC. The City may also require, as a condition of approval of development applications, dedication of avigation easements for areas within the Airport Clear Zones and Airport Approach Zones**.**
- **Policy SE 9.2: Height Restrictions.** The City shall ensure that the heights of proposed buildings, other structures, and landscaping conform to airport operational requirements to minimize the risk of aircraft accidents. The City shall establish and maintain standards in its zoning ordinance for building and structure height restrictions for development in proximity to the Santa Barbara Municipal Airport. To ensure compliance with height restrictions, proposed development or uses that require ALUC review pursuant to the Airport Land Use Plan shall be referred to the ALUC for review.
- **Policy SE 9.3: Limitations on Development and Uses.** The City shall establish and maintain standards in its zoning ordinance for use restrictions for development near the Santa Barbara Municipal Airport. These standards should identify uses that may be compatible in each zone. Proposed development or uses that require ALUC review pursuant to the Airport Land Use Plan shall be referred to the ALUC for review.

- **Policy SE 9.5: Limitations on Density.** The City shall establish and maintain standards in its zoning ordinance for density limitations for development near the Santa Barbara Municipal Airport. These standards should comply with the Santa Barbara County Airport Land Use Plan and should specify the density considered compatible in each zone. Proposed developments that require ALUC review pursuant to the Airport Land Use Plan shall be referred to the ALUC for review.
- **Goal SE 10: Hazardous Materials and Facilities.** Objective: To minimize injuries, illnesses, loss of life and property, and economic and social disruption due to potential upsets associated with the storage, use, handling, and transport of hazardous materials, and to ensure proper oversight of hazardous waste sites within the city.
- **Policy SE 10.2: Compliance with Law**. The storage, handling, and disposal of any hazardous material shall be done only in strict compliance with applicable City, state, and federal law.

Goleta Zoning Ordinance

The project is subject to the requirements of the City's previous zoning code, rather than the current zoning code, because the project application was deemed complete prior to the effective date of the new zoning code in April 2020. The southern two-thirds of the site is zoned Light Industry (M-1) and the northern third of the site is zoned Service Industrial-Goleta (M-S-GOL). Therefore, Sections 35-84A and 35-85 of the City's Coastal Zoning Ordinance would apply to the project.

Section 35-84A of the City's previous Coastal Zoning Ordinance provides development standards for M-S-GOL zone, including permitted uses, setback sizes, height limits, and performance standards. The following performance standard from Section 35-84A.7 would apply to the project:

- Open storage of equipment and materials shall be permitted only in areas screened from view of surrounding lots.

Section 35-85 of the City's previous Coastal Zoning Ordinance provides development standards for the M-1 zone, including permitted uses, setback sizes, height limits, building coverage limits, and performance standards. The following performance standards from Section 35-85.7 would apply to the project:

- No offensive odors or fumes, noxious gases, or liquids, heat, glare, or radiation generated by or resulting from any use, other than motor vehicles or lighting fumes, operated on any lot shall be detectable at any point along the boundary of or outside of the lot upon which such use is located.
- Except for that associated with the heating of buildings, there shall be no smoke or dust generated by or resulting from any use, other than motor vehicles, located upon the lot.
- All activities shall be conducted in such a manner so as not to be injurious to the health, safety, or welfare of persons residing or working in the neighborhood by reason of danger to life or property.

4.8.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

A Phase I ESA was conducted for the project site by Rincon Consultants, Inc. in accordance with ASTM E1527-13 and E1527-21 standards. The Phase I ESA included review of geology and hydrology, past and present land uses, and aerial photographs of the project site; interviews of individuals familiar with the property; site reconnaissance; and review of federal, State, regional, and local databases. Refer to the *Phase I Environmental Site Assessment*, included as Appendix I of this report.

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. Appendix G of the CEQA Guidelines contains a checklist of environmental factors to be assessed to determine the potential for significant impacts. Based on this checklist, the Project's impact would be significant if it exceeds the following thresholds.

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. 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.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.
4. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
5. Result in a safety hazard or excessive noise for people residing or working in the project area 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.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

The County of Santa Barbara's 2021 *Environmental Thresholds and Guidelines Manual* (refer to Section 4.0, *Environmental Impact Analysis*) contains thresholds for assessing the significance of impacts to public safety resulting from the involuntary exposure to hazardous materials. The manual establishes categories for identifying potential significant impacts to public safety including transportation of hazardous materials, as well as potentially significant impacts to non-hazardous land uses proposed in proximity to existing hazardous facilities. The manual specifically identifies a potentially significant impact to all development proposed in proximity to one or more existing hazardous facilities.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact HAZ-1 **PROJECT CONSTRUCTION WOULD INVOLVE MINIMAL ROUTINE TRANSPORT, USE, AND DISPOSAL OF HAZARDOUS MATERIALS. PROJECT OPERATION WOULD CONSIST OF AN INDUSTRIAL WAREHOUSE BUILDING AND COULD INVOLVE MINIMAL ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS. HOWEVER, ALL HAZARDOUS MATERIALS WOULD BE TRANSPORTED, HANDLED, AND DISPOSED OF IN COMPLIANCE WITH EXISTING FEDERAL, STATE, AND LOCAL REGULATIONS. PROJECT IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.**

Construction

Construction of the proposed project would temporarily increase the regional transport, use, and disposal of construction-related hazardous materials and petroleum products (e.g., diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals). These materials are commonly used at construction sites, and project construction activities would be required to comply with applicable federal, State, and local regulations established by the U.S. EPA, the State of California, the County of Santa Barbara, and the City of Goleta for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. Additionally, compliance with the Construction General Permit (refer to Section 4.9, *Hydrology and Water Quality*) requires implementation of Good Housekeeping Best Management Practices (BMPs) to reduce potential impacts to water quality due to spills or runoff from hazardous materials used during construction.

During site reconnaissance, various containers of hazardous substances and petroleum products, including floor finish, spray paint, tractor hydraulic fluid, gear/transmission oil, chlorinating tablets, and waste oil, were observed on the northwestern side of the concessions building on the project site. Project construction would remove existing hazardous materials and waste from the project site; removal and disposal of on-site hazardous materials would be required to comply with applicable federal, State, and local regulations, which would minimize potential impacts associated with the transport and disposal of these substances.

With compliance with existing regulations governing transport, use, and disposal of hazardous materials, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

Operation

Project operation would consist of an industrial warehouse building used for a variety of conforming uses allowed with the project site's M-S-GOL and M-1 zones, including industrial warehousing and storage, wholesaling and distribution, and construction and materials storage. The proposed industrial building could be leased to multiple tenants, whose operations could involve the transport, use, and disposal of hazardous materials for routine maintenance. While the specific industrial use of the project is unknown, quantities of hazardous materials may be transported, used, or stored during operation of the project. However, all hazardous material transport, use, or disposal associated with the proposed industrial warehouse and office space would comply with existing hazardous materials regulations established by the U.S. EPA, the State of California, the County of Santa Barbara, and the City of Goleta. These regulations prescribe measures for the safe transport, use, storage, and disposal

of hazardous materials to reduce risk of spills. With compliance with existing regulations governing transport, use, disposal of hazardous materials, impacts related to the routine transport, use, or disposal of hazardous materials during operation would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact HAZ-2 **PROJECT CONSTRUCTION COULD RESULT IN THE ACCIDENTAL RELEASE OF HAZARDOUS MATERIALS THROUGH DEMOLITION OF EXISTING STRUCTURES OR DISTURBANCE OF PROJECT SITE SOILS. HOWEVER, IMPLEMENTATION OF MITIGATION MEASURES HAZ-1 THROUGH HAZ-5 WOULD REDUCE IMPACTS TO CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.***

Construction

The existing buildings on the project site were constructed in approximately 1967, and consequently, asbestos-containing materials (ACMs) and lead-based paints (LBPs) may be present in structures on the project site, according to the Phase I ESA (Appendix I). Considering that project construction would result in demolition of the existing concessions stand and associated structures, project construction activities have the potential to result in accidental release of ACMs or LBPs, which would create a potentially significant hazard to both construction workers and the environment. However, demolition and construction activities would be required to adhere to Cal/OSHA regulations regarding asbestos and lead-based paint materials. The California Code of Regulations (CCR) requires testing, monitoring, containment, and disposal of lead-based materials (CCR Title 8, Section 1532.1) and asbestos (CCR Title 8, Section 15129).

The Phase I ESA determined that the project site is underlain by approximately 4 feet of fill soils of unknown origin (Appendix I). Although the *Environmental Soils Analysis* found that constituents of concern were not detected in project site soil samples at concentrations that exceed regulatory thresholds (Appendix O), there remains a potential that surficial soils to the west of the existing concessions stand could contain hazardous materials, should they exist in project site fill. The *Environmental Soils Analysis* concluded that the soil contamination is limited to the upper few inches in this location.

Project construction would include grading and earth-moving activities that could potentially disturb hazardous materials in surficial soil to the west of the existing concession stand, leading to an accidental release of hazardous materials that could impact both construction workers and the environment. Furthermore, adjacent properties to the north of the project site have handled or generated hazardous waste, with one property located at 891 South Kellogg Avenue (approximately 100 feet north of the project site) associated with two closed Cleanup Program cases (Appendix I). Past hazardous material releases from adjacent properties may have resulted in contaminated groundwater on the project site. As discussed in Section 4.9, *Hydrology and Water Quality*, based on the depth to groundwater, it is reasonable to assume that groundwater could be encountered during grading activities and groundwater dewatering would be required during construction of the proposed drainage basin and underground utility lines. The extraction of contaminated groundwater could result in an accidental release of hazardous materials. Depending on the quality of groundwater,

groundwater dewatering would be required to comply with an individual National Pollution Discharge Elimination System (NPDES) permit, waste discharge, or Limited Threat Discharge Permit, to ensure proper treatment and disposal. Given the potential for exposure to contamination on-site, the project to have a potentially significant impact involving hazardous materials releases and mitigation is required.

Operation

As stated above under Impact HAZ-1, project operational activities would involve the minimal transport, use, and disposal of hazardous materials used for routine maintenance. Quantities of hazardous materials may be transported, used, or stored. However, the project's operational activities would comply with applicable federal, State, and local regulations, which prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce the risk of accidental spills.

Mitigation Measures

HAZ-1 Asbestos Containing Materials Abatement

Prior to the issuance of Zoning Clearance associated with the demolition permit, the project applicant/Permittee shall prepare an asbestos abatement plan addressing the items/topics listed below. The asbestos abatement plan shall be reviewed and approved by the Planning and Environmental Review Director or designee. During project construction and demolition activities, the project applicant shall follow the measures outlined in the asbestos abatement plan and shall be undertaken by properly trained and licensed asbestos contractors currently registered with Cal/OSHA and/or OSHA (herein referred to as "abatement contractors"). Abatement contractors shall be selected and vetted by the project applicant, and reviewed by the Director of Planning and Environmental Review or Designee. Project-specific requirements to be addressed in the asbestos abatement plan include the following:

- Disturbance activities shall be performed only by abatement contractors using appropriate controls to prevent fiber emissions during the removal process. This may include, but is not limited to, the use of wet methods (water mist), negative pressure containment, high efficiency particulate air (HEPA) filtration, and other engineering controls, as deemed appropriate, to keep fibers from being dispersed in accordance with current federal, State, and local regulations. Presumed asbestos containing roofing materials shall be sampled by abatement contractors prior to demolition to determine proper handling and disposal requirements.
- Windows with trace (defined as less than 1 percent) asbestos in putty shall be removed intact to avoid disturbance of the putty, if possible. Other materials with trace asbestos shall be point counted to determine the asbestos concentrations; if asbestos concentrations are not determined, these materials shall be managed as ACMs.
- Workers performing removal shall be properly protected to prevent exposure, including the use of respiratory protection with HEPA filtration, protective suits, or other protective equipment deemed necessary by abatement contractors. Disturbance of greater than 100 square feet of any ACMs or asbestos-containing construction materials (ACCMs) must be performed by trained and licensed abatement contractors.
- Asbestos containing waste materials must be properly contained and transported for off-site disposal at a permitted landfill or disposal facility. Friable asbestos with greater than 1 percent asbestos content is considered hazardous waste per current federal and State regulations and

must be transported and disposed using proper manifest documentation. Non-friable asbestos is categorized as non-hazardous, asbestos containing waste and can typically be disposed to the local Class III landfill with prior approval from landfill operators. As noted, materials with less than 1 percent total asbestos can be disposed of as construction debris if proper lab analysis is provided.

- The abatement contractor shall be responsible for complying with local, State, and federal standards for worker protection and National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations regarding asbestos fiber emissions. Proper removal techniques must be followed to prevent the dissemination of asbestos fibers. All required notification and permitting shall be administered by the abatement contractor, and proper completion shall be verified by the City's Director of Planning and Environmental Review.
- There is the potential suspect materials previously unidentified could be discovered during site renovation/demolition work. This could include suspect materials located inside walls, under floors, above ceilings, and in other areas. If suspect materials are found during site work, the area shall be isolated, and any suspect materials tested to confirm or deny the presence of asbestos, lead, or other hazards, as determined appropriate by the abatement contractor.

Plan Requirements and Timing. The project applicant shall prepare the asbestos abatement plan and contract with an abatement contractor prior to the issuance of the Zoning Clearance associated with the demolition permit.

Monitoring. The Director of Planning and Environmental Review or Designee shall approve the asbestos abatement plan prior to the issuance of Zoning Clearance and then spot-check during demolition activities and verify compliance documentation following the project's demolition activities.

HAZ-2 Lead-Based Paint Abatement

Prior to the issuance of a Zoning Clearance associated with the demolition permit, the project applicant/Permittee shall prepare a lead based paint abatement plan. This plan can be combined with the plan required in Mitigation Measure HAZ-1. The lead based paint plan shall be reviewed and approved by the Planning and Environmental Review Director or designee. During project construction and demolition activities, the project applicant shall follow the measures outlined in the lead based paint abatement plan. specific requirements related to lead-based paint. These requirements shall be undertaken by properly trained contractors that utilize lead-safe work practices (or "abatement contractors"). Abatement contractors shall be selected and vetted by the project applicant and reviewed by the City of Goleta. Project-specific requirements of the plan include the following:

- Any disturbance by abatement contractors that might generate dust or create a lead exposure hazard shall be performed by lead-trained workers using lead-safe work practices. Lead safe work practices include appropriate containment, wet methods, and use of hand tools or similar methods that will minimize the generation of airborne dust emissions and potential lead hazards.
- To prevent lead exposure hazard due to the generation of lead dust and debris, lead painted components (e.g., windows, doors, baseboards) or similar lead containing items shall be removed intact and segregated from the overall waste stream by abatement contractors.
- Lead containing waste shall be properly disposed of by abatement contractors in accordance with local, State, and federal regulations. Lead containing waste is classified as Hazardous Waste if

total lead concentration exceeds 1,000 milligrams per kilogram (or parts per million) or if soluble lead concentration exceeds 5.0 milligrams per liter. Proper waste characterization testing or waste profiling shall be conducted prior to disposal of lead containing waste. If practicable, lead wastes shall be segregated to minimize the volume of possible hazardous waste. If lead-containing and non-lead waste materials are comingled during demolition, composite samples of representative waste shall be analyzed by a certified lab to determine proper disposal requirements.

Plan Requirements and Timing. The project applicant shall prepare the lead-based pain abatement plan and contract with an abatement contractor prior to the issuance of the Zoning Clearance associated with the demolition permit.

Monitoring. The Director of Planning and Environmental Review or Designee shall approve the lead based paint abatement plan prior to the issuance of Zoning Clearance and then check the abatement contractor's monitoring log to ensure project-specific recommendations are enacted during project demolition activities.

HAZ- 3 Groundwater Investigation and Disposal

Prior to issuance of Zoning Clearance for construction or grading, the project applicant shall retain a qualified environmental consultant (Professional Geologist [PG] or Professional Engineer [PE]) to conduct a groundwater investigation of groundwater at the project site for potential contaminants of concern. The PG or PE shall prepare a groundwater investigation report, which shall be submitted to the City's Director of Planning and Environmental Review for review and approval prior to the issuance of the Zoning Clearance associated with grading permits. As part of the groundwater investigation, analytical results shall be screened against the Central Coast Regional Water Quality Control Board (RWQCB) environmental screening levels. These environmental screening levels are risk-based screening levels for direct exposure of a construction worker and commercial/ industrial land use. The groundwater investigation report shall include recommendations to address identified hazards and indicate when to apply those recommended actions in relation to project activities.

If contaminants are detected in groundwater at the project site, the project applicant shall implement the recommendations specified in the groundwater investigation report to protect site workers during project construction.

If disposal of contaminated groundwater is required during construction of the project, the Central Coast RWQCB and/or the City shall be consulted to determine if the treated groundwater can be disposed of through one of their waste discharge permit options. Based on the concentrations of chemical constituents of contaminated groundwater, the Central Coast RWQCB may require that an individual National Pollution Discharge Elimination System (NPDES) permit and/or waste discharge requirements be obtained for dewatering activities.

Plan Requirements and Timing. The project applicant shall retain a qualified environmental consultant to conduct the groundwater investigation prior to the issuance of Zoning Clearance associated with the issuance of grading permits.

Monitoring. Following submittal of the subsurface investigation report, the Director of Planning and Environmental Review or Designee shall review project construction plans to ensure applicable recommendations from the groundwater investigation report are integrated into construction plans.

HAZ-4 Soil Remediation

The 15-foot diameter area that is to the west of the existing concessions stand and encompasses soil sample location SS-1, as defined in the *Environmental Soils Analysis* (Appendix O), shall be sequestered for further analysis to determine if the soils can be reused on site or if should be disposed of off-site. If the soil testing results indicate that the soils exceed environmental screening levels, then the soils shall not be reused on site. The City shall retain a qualified consultant (Professional Geologist or Professional Engineer) to properly sample, delineate, and remove and/or dispose of the contaminated soil. The qualified consultant shall utilize the project site analytical results for waste characterization purposes to determine the appropriate methods for off-site transportation and disposal of potentially impacted soils. The qualified consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils and/or provide recommendations for remedial engineering controls, if appropriate. The City's Director of Planning and Environmental Review or Designee shall review and approve the disposal recommendations for regulated waste prior to transportation of impacted soils off-site, and review and approve remedial engineering controls prior to construction.

Subsequently, the project applicant shall review and implement the project site disposal recommendations for regulated waste prior to transportation of impacted soils off-site, and review and implement remedial engineering controls, prior to the start of grading.

Plan Requirements and Timing. The project applicant shall retain a qualified environmental consultant to sequester, sample, and dispose of contaminated soil prior to the issuance of grading permits.

Monitoring. The Director of Planning and Environmental Review or Designee shall review contaminated soil disposal recommendations prior to transportation of impacted soils off-site.

HAZ-5 Site Management Plan

The project applicant shall retain a qualified environmental consultant (Professional Geologist or Professional Engineer) to prepare a Site Management Plan (SMP) prior to the issuance of Zoning Clearance associated with grading permit. The SMP, or equivalent document, shall be prepared to address on-site handling or management of impacted soils or groundwater if such soils or impacted wastes are encountered during the groundwater investigation or soil remediation, and reduce hazards to construction workers and offsite receptors during construction. The project applicant shall submit the SMP to the City's Director of Planning and Environmental Review, who shall review the SMP prior to issuance of Zoning Clearance for grading permits.

The SMP shall establish remedial measures and/or soil or groundwater management practices to ensure construction worker safety, the health of future workers and visitors, and the prevention of offsite migration of contamination from the project site. These measures and practices may include, but are not limited to:

- Stockpile management including stormwater pollution prevention and the installation of Best Management Practices (BMPs)
- Collection of groundwater samples during dewatering
- Proper disposal procedures of impacted materials
- Monitoring and reporting

- A health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of project site construction activities with the requirements and procedures for employee protection.
- The health and safety plan shall outline proper soil and groundwater handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.
- Proper handling procedures for unexpected contamination, such as halt-work and avoidance protocols, and City and contractor notifications

The SMP shall also specify the procedures to be implemented in the event unexpected hazardous materials are encountered during construction. If unexpected odorous or visually stained soils, other indications of hydrocarbon piping or equipment, or debris are encountered during ground-disturbing activities, the construction contractor shall halt work in the immediate area and a qualified environmental consultant (PG or PE) shall be contacted immediately to evaluate the situation. The qualified environmental consultant shall evaluate the material and recommend the appropriate testing, removal, and disposal methods. The construction contractor shall ensure hazardous materials are removed or remediated in accordance with the requirements of the qualified environmental consultant and the SMP. Construction work may continue on other parts of the project while soil investigation and/or remediation takes place. The construction contractor shall not resume work until approved by the qualified environmental consultant and the City.

Plan Requirements and Timing. The project applicant shall retain a qualified environmental consultant to prepare the SMP prior to the issuance of Zoning Clearance and provide it to the Planning and Environmental Review Director or designee for approval prior to the issuance of the Zoning Clearance associated with grading permits.

Monitoring. Following approval of the SMP, the Director of Planning and Environmental Review or Designee shall review project construction plans to ensure applicable recommendations from the SMP are integrated into construction plans provided for approval of the Zoning Clearance for construction.

Significance After Mitigation

Implementation of Mitigation Measures HAZ-1 through HAZ-5 prior to and during construction would reduce potential hazardous material impacts associated with accidental releases to a less-than-significant level.

Threshold 3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-3 THE CLOSEST SCHOOL TO THE PROJECT SITE IS THE RAINBOW SCHOOL, LOCATED APPROXIMATELY 0.5 MILE NORTH OF THE PROJECT SITE. THE PROJECT WOULD HAVE NO IMPACT REGARDING HAZARDOUS MATERIAL EMISSIONS WITHIN 0.25 MILE OF AN EXISTING OR PROPOSED SCHOOL.

The nearest school to the project site is the Rainbow School, a kindergarten located approximately 0.5 mile north of the project site. The Goleta Union School District is not planning on constructing future schools within 0.25 mile of the project site. The project site is not located within 0.25 mile of an existing or proposed school, and therefore would have no impact associated with emissions of hazardous materials, substances, or wastes within 0.25 mile of a school.

Mitigation Measures

No mitigation measures are required.

Threshold 4: Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact HAZ-4 HAZARDOUS MATERIALS WERE HISTORICALLY USED AT THE PROJECT SITE FOR AGRICULTURE. THE PROJECT SITE IS NOT INCLUDED ON A LIST OF HAZARDOUS MATERIAL SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5, AND THE PROJECT WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT. THE PROJECT WOULD HAVE NO IMPACT.

Government Code Section 65962.5 requires the California Environmental Protection Agency to develop an updated Hazardous Waste and Substances Sites List, also known as the Cortese List. The DTSC is responsible for a portion of the information contained in the Cortese List; other state and local government agencies are also required to provide additional hazardous material release information for the Cortese List. The analysis for this section included a review of the following resources on March 6, 2023, to provide hazardous material release information:

- SWRCB GeoTracker database (SWRCB 2023)
- DTSC EnviroStor database (DTSC 2023)

Based upon review of these databases, there are no active hazardous material sites mapped within the project site. As such, the proposed project would not create a significant hazard to the public or the environment due to listed cleanup sites. Therefore, the proposed project would have no impact regarding hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Mitigation Measures

No mitigation measures are required.

Threshold 5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact HAZ-5 THE PROJECT SITE WOULD BE LOCATED WITHIN SAFETY ZONES AND THE AIRPORT INFLUENCE AREA FOR THE SANTA BARBARA MUNICIPAL AIRPORT. HOWEVER, COMPLIANCE WITH EXISTING FEDERAL AVIATION ADMINISTRATION REGULATIONS ENSURE THE PROPOSED PROJECT WOULD NOT RESULT IN A SAFETY HAZARDS FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA. IMPACTS WOULD BE CLASS II, *LESS THAN SIGNIFICANT*.

The Santa Barbara Municipal Airport is located approximately 0.25 mile west of the project site. The northern portion of the project site is located within the Clear Zone of the Santa Barbara Airport. As the entire project site is located within the Airport Influence Area (ALUC 1993), 1993 Santa Barbara County ALUP standards would apply to the proposed development. Additionally, considering the project site is located within 20,000 feet of an airport, the project site falls within the 20,000-foot FAR Part 77 Notification Area for the Santa Barbara Municipal Airport.

According to the 1993 Santa Barbara County ALUP, the project site is located within Airport Safety Zone II within the Airport Influence Area. The northern portion of the project site is located within Safety Area 1 (Clear Zone) and the southern half of the project site is located within Safety Area 3 (General Traffic Pattern Zone). The more restrictive development standards of Safety Area 1 apply to the project. Therefore, the ALUP development standard of a maximum intensity of 25 people per acre, as a site-wide average, would apply to the project. The proposed industrial building would employ 75 people daily, and would occupy approximately 1.62 acres of the total 11.77-acre project site, which represents an intensity of 6.37 people per acre. Therefore, development under the proposed project would comply with the standard specified in the 1993 Santa Barbara County ALUP. The project site is located in the 60-65 dB CNEL noise contour for Santa Barbara Airport. Industrial land uses are identified as compatible within this contour in the 1993 Santa Barbara County ALUP (ALUC 1993). Therefore, the project would not conflict with the 1993 Santa Barbara County ALUP.

Height limitations are imposed on projects within an airport hazard area so that structures or trees do not obstruct the airspace required for the flight of aircraft in landing or taking off at an airport, or is otherwise hazardous to the landing or taking off of aircraft. The 1993 Santa Barbara County ALUP does not specify a maximum height for structures in Safety Area 1, and states that objects should be limited in height consistent with airspace protection surfaces defined by FAR Part 77. The proposed industrial building would have a maximum height of approximately 35 feet from finished grade, and would have a maximum height of approximately 39 to 41 feet. Although the proposed project would increase building height on the project site, and would be built at a height taller than existing development in the area, the project would be consistent with the City's development standards and zoning code that existed prior to 2020, which considered proximity to the Santa Barbara Municipal Airport.

The City engaged with SBCAG, in their capacity as the ALUC, in August 2023. SBCAG determined that the project would not be required to undergo ALUC review as the previous zoning ordinance and General Plan were found consistent with the 1993 Santa Barbara County ALUP and the project does not require any amendments to either. Project design, including building height, would be subject to FAR Part 77, which requires projects that may affect navigable airspace to submit a Notice of Proposed Construction or Alteration to FAA for review and approval. If a proposed development is identified as a presumed hazard, the FAA may require further aeronautical study or allow the project to be revised. The project applicant would be required to file a Notice of Proposed Construction or Alteration with the FAA regional office at least 30 days prior to construction. Based on project design, the FAA would then determine whether the project poses a hazard to air navigation and could request changes to project design to minimize those hazards. The FAA would evaluate the project against FAR Part 77 Section 77.17, which provides height standards to ensure the project would not obstruct navigable airspace. Additionally, the FAA would provide lighting recommendations under FAR Part 77 Section 77.21 (d) [4]. The proposed project would comply with existing FAA regulations related to airport hazards and safety. Following compliance with these existing regulations, impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 6:	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-6 PROJECT CONSTRUCTION AND OPERATION WOULD NOT RESULT IN IMPAIRMENT OR INTERFERENCE WITHIN EMERGENCY RESPONSE OR EVACUATION PLANS. IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The City of Goleta, in cooperation with FEMA, the County of Santa Barbara, and State Offices of Emergency Services, is responsible for emergency preparedness and response. Components of emergency preparedness and response include identification of evacuation routes and secondary emergency accesses, as well as provision of information to the community regarding appropriate individual actions in the event of various types of emergencies.

The City's General Plan does not identify roadways adjacent to the project site as major evacuation routes. Project construction would not impair implementation of an adopted emergency response plan or emergency evacuation plan, as construction staging and construction worker parking would occur on-site and would not impede existing roadway traffic. Operation of the project would consist of an industrial warehouse building used for office space, materials storage, wholesaling, distribution, and other permitted uses in accordance with the project site's M-S-GOL and M-1 zones. Operation of the project would not introduce activities that could impede or interfere with emergency plans or emergency evacuations.

Therefore, project construction and operation would not result in impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 7:	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact HAZ-7 THE PROJECT SITE IS NOT LOCATED IN A FIRE HAZARD AREA, AND PROJECT CONSTRUCTION AND OPERATION WOULD NOT EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING WILDLAND FIRES. IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The project site is not within a State Responsibility Area (SRA), or lands classified as very high fire hazard severity zones (VHFHSZ) (California Department of Forestry and Fire Protection [CAL FIRE] 2022). The nearest VHFHSZ is located approximately 1.95 miles north of the project site. Existing residential development, commercial development, and U.S. 101 separate the project site from the VHFHSZ.

The proposed project would be constructed in accordance with the requirements of the California Fire Code, which are implemented to minimize the potential for fire to occur. Additionally, the proposed project would be constructed in accordance with the Santa Barbara County Fire Department's (SBCFD) development standards, which include requirements for egress on private driveways, fire hydrant spacing and flow rates, automatic fire sprinkler systems, and automatic alarm systems (SBCFD 2022). Adherence to State and local regulations would ensure project construction and operation would not expose people or structures to significant risk of loss, injury, or death

involving wildland fires. Impacts would be less than significant. Please refer to Section 4.15, *Effects Found Not to be Significant*, under "Wildfire" for further discussion related to wildfire impacts.

Mitigation Measures

No mitigation measures are required.

4.8.4 Cumulative Impacts

Generally, hazards and hazardous materials impacts associated with individual developments are site-specific in nature and must be addressed on a case-by-case basis. As such, the geographic scope for hazardous materials impacts is the project site and immediately surrounding parcels. Since hazards and hazardous materials are required to be examined as part of the permit application and environmental review process, potential impacts associated with individual projects will be adequately addressed prior to permit approval.

Cumulative projects proposed in and around Goleta would have the potential to expose future area residents, employees, and visitors to hazards by developing and redeveloping areas that may have previously been contaminated. The magnitude of hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. If lead-based paints or asbestos-containing materials are found to be present in buildings planned for demolition or renovation, or in the case that soil and groundwater contamination are found to be present on sites of planned and future development, these conditions would be required to comply with existing applicable local, State, and federal regulations. Hazard evaluations would be completed on a case-by-case basis for future development. Compliance with applicable regulations and implementation of appropriate mitigation measures, including remedial action on contaminated sites, would address impacts related to these hazards and hazardous materials associated with future development in the City. Cumulative impacts related to hazards and hazardous materials would be less than significant and the project's contribution would not be cumulatively considerable—the project would not use, transport, or dispose of large quantities of hazardous materials, would not be located on a hazardous material site, and would reduce the risk of hazardous material accidental releases through implementation of Mitigation Measures HAZ-1 through HAZ-5.

The geographic scope for cumulative safety hazards impacts is inclusive of projects within the Santa Barbara Municipal Airport Influence Area. Several cumulative projects listed within Table 3-1 in Section 3, *Environmental Setting,* are within the Santa Barbara Municipal Airport Influence Area, thereby potentially exposing persons to risk of airport safety hazards. However, these projects are subject to review of airport-related hazards during the environmental review process and by the FAA and ALUC, which would ensure that development does not impose an aviation-related hazard on structures or people. Therefore, cumulative airport safety impacts would be less than significant. Potential safety hazards associated with the proposed project include building height and lighting. However, the project would be reviewed by the FAA, which would reduce impacts to a less than significant level. Therefore, the incremental increase in airport safety hazards at the project site would be negligible and would not result in a cumulatively considerable contribution to a significant cumulative impact related to safety hazards.

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4.9 Hydrology and Water Quality

This section analyzes the proposed project's potential impacts to hydrology and water quality, including the proposed project's potential to result in substantial water quality impairment, substantially decrease groundwater supplies or interfere with groundwater recharge, substantially alter existing drainage patterns, risk pollutant release during inundation, and obstruct implementation of a water quality control plan or sustainable groundwater management plan. This section is based, in part, on the *Preliminary Drainage Design* (Appendix H), the *Stormwater Control Plan* (Appendix J), the *Revised Geotechnical Engineering Report Update* (Appendix G), the *Flood Evaluation Memorandum* (Appendix M), and the *Sea Level Rise and Coastal Hazards Analysis* (Appendix N).

4.9.1 Environmental Setting

a. Project Site Setting

Watersheds and Surface Waters

The project site is located within the San Pedro Creek watershed which covers approximately 27.6 square miles in southern Santa Barbara County (California Department of Transportation 2023). For regulatory purposes, the Central Coast Regional Water Quality Control Board (RWQCB) uses the watershed classification system developed by the Department of Water Resources (DWR), which divides watersheds into Hydrologic Units that are divided into Hydrologic Areas and Hydrologic Sub-Areas. As designated by the Central Coast RWQCB, the project site is located within the South Coast Hydrologic Unit and the Goleta Hydrologic Sub-Area (Central Coast RWQCB 2019).

San Jose Creek is located adjacent to the eastern boundary of the project site, Old San Jose Creek is located approximately 170 feet west and southwest of the project site, San Pedro Creek is located approximately 0.15-mile west of the project site, and Atascadero Creek is located approximately 0.25-mile south of the project site. The State Water Resources Control Board (SWRCB) has listed San Jose Creek, San Pedro Creek, and Atascadero Creek as impaired by a variety of pollutants, including chloride, fecal coliform, *Escherichia coli* (E. coli), and excessive salinity. The SWRCB has not listed Old San Jose Creek as impaired (SWRCB 2018).

Hydrology and Drainage

According to the *Preliminary Drainage Design* prepared for the proposed project (Appendix H) the project site has topography similar to a bowl, with drainage flows directed to two existing sump pumps which discharge through the San Jose Creek Channel levee into San Jose Creek. San Jose Creek conveys flows north to south for eventual discharge at the Pacific Ocean, located approximately 0.5-mile south of the project site. The project site is underlain by low permeability soils and a high groundwater elevation which makes stormwater infiltration infeasible at the project site.

Groundwater

The project site overlies the Goleta Groundwater Basin (Basin), a 14.4 square mile groundwater basin that underlies the Goleta Valley. The Basin is bounded to the west by the topographic divide east of Ellwood Canyon and to the southeast by the Modoc fault. Sedimentary rocks underlie and bound the basin to the north and northeast and are uplifted along the More Ranch fault on the southern

boundary. The total storage capacity of the Basin is estimated at 200,000 acre-feet. The Basin contains three subbasins: West, Central, and North. The project site overlies the Central subbasin. The Central subbasin is bounded to the west by the La Cumbre Country Club to the east, Atascadero Creek to the south, Santa Barbara Municipal Airport to the west, and foothills to the north. The Basin is naturally recharged from the Cieneguitas, Atascadero, San Antonio, Maria Ygnacio, San Jose, Las Vegas, San Pedro, Carneros, and Tecolotito creeks. Natural recharge of the Basin occurs from infiltration of precipitation, seepage from streams, and subsurface inflow from consolidated rocks (DWR 2004; Goleta Water District [GWD] 2021).

As a result of a long period of dry years from the 1940s to the 1970s and population growth, water supplies in the Basin were considered to be short of demand by the 1970s. In 1973 a group of landowners filed a lawsuit for the adjudication of water rights in the Basin. Portions of the Basin, including the entire Central subbasin, was adjudicated through a Santa Barbara Superior Court case [*Wright v. Goleta Water Dist*. (1985) 174 Cal. App.3d74]. The Court's decision was finalized in 1989 and is known as the Wright Judgement. The Goleta Water District manages adjudicated water rights for Goleta, as directed by the Wright Judgement. Pursuant to the Wright Judgement, GWD has the right to pump up to 2,000 acre-feet per year (AFY) from the Basin in addition to the right to surplus waters, injected water, return flows, and rights transferred from private pumpers (GWD 2021, 2023).

Groundwater elevations in the Central subbasin have fluctuated by approximately 150 feet over a period of 80 years. Drought conditions beginning in 2012 combined with increased pumping of the Central subbasin have caused water levels to decline in the Central Subbasin (GWD 2023). At the project site, groundwater elevations range from approximately 3 feet below ground surface to 7.5 feet below ground surface (Appendix G).

Total dissolved solids (TDS) levels in the Basin have exceeded 1,000 milligrams per liter, the secondary maximum contaminate level[1] for TDS in drinking water in the last ten years. High levels of TDS produce hard water, water with high levels of calcium and magnesium, which can leave mineral deposits on fixtures, but is not a health hazard. The Basin has also experienced an excess of sulfate, and has iron and manganese concentrations above secondary maximum contaminant level standards. Excessive sulfate may cause a bitter or astringent taste in water and can have laxative effects. High levels of iron and manganese may cause staining and may impart a strong metallic taste to the water (GWD 2023).

Flooding and Inundation

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map No. 06083C1362H, the project site is within Zone A, corresponding to an area within the 100-year floodplain, while San Jose Creek is a mapped regulatory floodway (Appendix M). Rain and stormwater that fall onto the project site flow from north to south toward two existing sump pumps which discharge into San Jose Creek. Rain and stormwater that falls outside of the project site does not enter the project site due to the presence of an existing earthen berm around the project site. FEMA Map 06083C1362H does not consider the earthen berm that surrounds the project site because the berm lacks the characteristics required to meet the definition of an accredited levee recognized by FEMA. Therefore, the FEMA map depicts the project site as located within a 100-year floodplain even though the site, in its current condition, would not be inundated by the 100-year flood (Appendix M).

[1] Secondary maximum contaminant levels are established as guidelines to assist public water systems in managing drinking water for aesthetic considerations, such as taste, color and odor. Contaminants are not considered to present a risk to human health at the secondary maximum contaminant level for a particular compound.

Tsunamis and seiches are two types of water waves that are generated by earthquake events. Tsunamis are broad-wavelength ocean waves and seiches are standing waves within confined bodies of water, typically reservoirs. According to the City's General Plan, the project site is located inside a Tsunami Hazard Area (City of Goleta 2006a); however, the Tsunami Hazard Area Map for the County of Santa Barbara, updated on July 8, 2021, indicates that the project site is located outside the tsunami hazard zone as designated in the Tsunami Hazard Area Map for the County of Santa Barbara (Appendix N). Given that the County of Santa Barbara uses more recent data than the City's General Plan, the County's determination is applied to this analysis. Due to the absence of a large body of water, such as a reservoir, in proximity to the project site, the project site is not subject to inundation from seiche.

The Rancho Del Ciervo dam is located approximately 3.3 miles north of the project site. According to the California Department of Water's (DWR) Dam Breach Inundation Map Web Publisher, the project site is located within the inundation zone of the Rancho Del Ciervo dam (DWR 2023a).

Sea Level Rise

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association [CBIA]* v. *Bay Area Air Quality Management District [BAAQMD]*, 62 Cal. 4th 369 [No. S 213478] issued December 17, 2015), it is generally not considered the purview of the CEQA process to evaluate the impact of existing environmental conditions on a proposed project. Therefore, this discussion of sea level rise is provided solely for informational purposes.

Sea level rise is an increase in the level of the ocean due to the effects of global warming. Sea levels in California are expected to rise in the coming decades as a result of global greenhouse gas emissions. Large portions of the California coast are susceptible to coastal erosion. As sea levels rise, the amount of time that beaches are exposed to waves and abnormally high tides increases, furthering beach erosion and substantially narrowing the width of the beaches. Rising sea levels are projected to cause waves to force water further inland, especially during coastal storm events (Appendix N).

The project site is situated in a low-lying area approximately 0.6 mile from the coastline that protects the project site against additional impacts due to sea level rise and climate change such as waves, wave run-up, or wave overtopping, as well as shoreline and bluff erosion that would affect sites fronting the ocean or closer to the shoreline. However, the project site is near creeks that are currently subject to flooding due to stormwater runoff and coastal inundation from storm surges, making the location of the proposed industrial building an area vulnerable to inundation from future sea level rise (Appendix N).

4.9.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The Federal Water Pollution Prevention and Control Act was enacted in 1948 to ensure that discharges do not substantially degrade the physical, chemical, or biological integrity of the Nation's waters. In 1972, the Federal Water Pollution Control Act was amended (and at that time became known as the Clean Water Act [CWA]) to prohibit discharge of pollutants to waters of the United States from any point source unless it is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. Specifically, Section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) Regulations for stormwater and other pollutant discharges.

Congress amended the CWA in 1987 to require the implementation of a two-phased program to address stormwater discharges. Phase I, promulgated by the U.S. Environmental Protection Agency (USEPA) in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4s)[2] serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and ten categories of industrial activities.

The USEPA recognized that smaller construction projects (disturbing less than five acres) and small MS4s (serving populations smaller than 100,000) were also contributing substantially to pollutant discharges nationwide. Therefore, in order to further improve stormwater quality, the USEPA promulgated the NPDES Phase II program (*Federal Register* Vol. 64, No. 235, December 8, 1999). The Phase II regulations became effective on February 7, 2000 and require NPDES permits for stormwater discharges from regulated small MS4s and for construction sites disturbing between one and five acres of land. The USEPA designates Goleta as a regulated small MS4.

In addition, Sections 401 and 404 of the Clean Water Act establish regulations for the discharge of dredged or fill material into waters of the United States and water quality impacts associated with these discharges.

When designated beneficial uses of a particular water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as impaired. Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body.

National Flood Insurance Program

Congress acted to reduce the costs of disaster relief by passing the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973. The intent of these acts was to reduce the need for large, publicly funded flood control structures and disaster relief efforts by restricting development in floodplains. FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in a floodplain. FEMA issues Flood Insurance Rate Maps of communities participating in the NFIP. These maps delineate flood hazard zones in the community.

b. State Regulations

Industrial Stormwater Permit

The *General Permit for Stormwater Discharges Associated with Industrial Activities* (Industrial General Permit; Order No. 2014-0157-DWQ, as amended by orders WQ 2015-0122-DWQ and WQ 2018-0028-DWQ; NPDES No. CAS00001) regulates operation of industrial facilities in California based on the Standard Industrial Classification Codes specified in the permit. These facilities include, but are not limited to, manufacturing plants, mining facilities, oil and gas facilities, hazardous waste facilities, landfills, wastewater treatment facilities, recycling facilities, and vehicle maintenance shops that have the potential to discharge stormwater runoff into water bodies. The proposed project would be a

[2] An MS4 is a conveyance or system of conveyances designed or used to collect or convey stormwater (e.g., storm drains, pipes, ditches) that are owned by a state, city, town, or other public entity and discharge to the waters of the United States.

storage warehouse and does not include facilities that are included on the Standard Industrial Classification Codes specified in the permit. Therefore the Industrial Stormwater Permit is not applicable to the proposed project.

Porter-Cologne Water Quality Control Act of 1970

The federal CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs. California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the State Water Resources Control Board (SWRCB) and the nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the federal CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface water and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product. Each RWQCB must formulate and adopt a water quality control plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its state water policy. The Porter-Cologne Act also provides that an RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The project site is within the jurisdictional boundaries of the Central Coast RWQCB.

Phase II Municipal Stormwater Permit

The Municipal Stormwater Permitting Program regulates stormwater discharges from MS4s. The NPDES MS4 permits in California are issued in two phases by the SWRCB and RWQCBs. Phase I MS4 permits are issued by the RWQCBs to medium (i.e., serving between 100,000 and 250,000 people) and large (i.e., serving more than 250,000 people) municipalities. Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The Phase II MS4 Permit is issued by the SWRCB and is applicable to smaller municipalities (i.e., populations of less than 100,000 people) and nontraditional small MS4s (e.g., military bases, public campuses, and prison and hospital complexes). The Phase II MS4 Permit (*Waste Discharge Requirements [WDRs] for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems [MS4s] General Permit],* Order No. 2013-0001-DWQ, NPDES No. CAS000004) became effective on July 1, 2013 and covers Phase II permittees statewide, including the County of Santa Barbara and City of Goleta. The Phase I and Phase II MS4 Permits require the permittees to develop a stormwater management program and individual dischargers to develop and implement Stormwater Quality Management Plans (SWQMP).

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) of 2014 is a comprehensive three-bill package that the governor of California signed into California State law in September 2014. The SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention if necessary to protect the resource. The plan is intended to ensure a reliable groundwater supply for California for years to come. The SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts of groundwater basins. The SGMA requires the formation of local groundwater sustainability agencies

(GSAs) that are required to adopt Groundwater Sustainability Plans to manage the sustainability of the groundwater basins. DWR has designated the Goleta Groundwater Basin as a very-low priority basin (DWR 2023b). SGMA is not applicable to adjudicated basin, including the Central subbasin, and therefore the Goleta Water District continues to administer its duties in accordance with the Wright Judgment adjudication (GWD 2021).

Construction Stormwater General Permit

The *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit), adopted by the SWRCB, regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction Stormwater General Permit authorizes the discharge of stormwater to surface waters from construction activities. The Construction Stormwater General Permit requires that all developers of land where construction activities will occur over more than one acre do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction Stormwater General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMPs) that will reduce pollution in stormwater discharges to the Best Available Technology/ Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage in accordance with the Construction Stormwater General Permit, a project applicant must electronically file all permit registration documents with the SWRCB prior to the start of construction. Permit registration documents must include:

- Notice of Intent, including Risk Level determination;
- Site Drawings and Maps;
- SWPPP;
- Applicable plans, calculations, and other supporting documentation for compliance with existing permitted Phase I or Phase II municipal separate storm sewer system post-construction requirements or the post-construction standards of the Construction Stormwater General Permit;
- Annual fee per the current 23 California Code of Regulations Chapter 9 fee schedule for NPDES stormwater permits; and
- All applicable additional Permit Registration Document information.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, and control pollutants from construction materials.

c. Local Regulations

Water Quality Control Plan

The Central Coast RWQCB has adopted a Water Quality Control Plan for the Central Coast Basin (Basin Plan) for their region of responsibility that delineates water resource area boundaries based on hydrological features. For the purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the surface waters and groundwater management zones described in the Basin Plan. Once beneficial uses are designated, appropriate water quality objectives are established, and programs that maintain or enhance water quality are implemented to ensure the protection of beneficial uses.

The Basin Plan also established implementation programs to achieve water quality objectives to protect beneficial uses and require monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State antidegradation policy (SWRCB Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

Post-Construction Stormwater Management Requirements

The Central Coast RWQCB adopted the *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region* (Post-Construction Requirements; Resolution R3-2013-0032) in July 2013, which outlines runoff reduction and treatment requirements. Specifically, Resolution R3-2013-0032 outlines post-construction requirements (PCRs) for development projects in the Central Coast Region. The PCRs mandate that development projects use Low Impact Development (LID) BMPs to detain, retain, and treat runoff. LID BMPs incorporate and conserve on-site natural features, together with constructed hydrologic controls to more closely mimic pre-development hydrology and watershed processes.

To assist project applicants in meeting the requirements of Resolution R3-2013-0032, the City has adopted the County of Santa Barbara's *Stormwater Technical Guide for Low Impact Development* which is designed to ensure City compliance with postconstruction requirements, facilitate review of applications, and promote integrated LID design. The guide interprets, clarifies, and adds to the post-construction requirements (County of Santa Barbara 2017).

Low Threat Discharge Permit

The Central Coast RWQCB has a general permit for discharges that pose a low threat to water quality (*Waste Discharge Requirements National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges with Limited Threat to Water Quality* [Limited Threat Discharge Permit]; Order No. R3-2022-0035, NPDES No. CAG99304). The permit's provisions cover discharges that contain minimal amounts of pollutants and pose little or no threat to water quality and the environment, including discharges of highly treated groundwater generated during aquifer pumping tests, dual-phase extraction or other remedial pilot tests, excavation dewatering, and pumping to contain groundwater plumes. According to the *Geotechnical Report* prepared for the proposed project (Appendix G), groundwater beneath the project site is approximately 3 to 7.5 feet below ground surface. Therefore, it is reasonable to assume that groundwater could be encountered during grading activities and require groundwater dewatering.

City of Goleta General Plan

The Safety Element of the City's General Plan contains policies which assist the City to minimize flood damage to structures and people. Policies relevant to the proposed project include (City of Goleta 2006b):

- **SE 6.1: Map of Flood Hazard Areas.** The City shall use the most recent edition of the federal Flood Insurance Rate Maps (FIRM maps) in evaluating applications for new or expanded development on properties subject to flood hazards. All applications for new or expanded development shall be required to show, where applicable, the floodway, 100-year floodplain, and the 500-year floodplain on the site plan showing the proposed development. The map in Figure 5-2 is a facsimile rather than the official flood hazard map and is intended only to be illustrative of possible flood hazard areas.
- **SE 6.2: Areas Subject to Local Urban Flooding.** In addition to flood hazard areas shown on the FIRM maps, the City may require applications for new or expanded development in areas with known persistent local urban flooding to include measures that lessen the urban flooding hazard and/or that mitigate its effects on the proposed development. This requirement shall apply to flooding on any street or roadway that provides access to the proposed development.
- **SE 6.4: Avoidance of Flood Hazard Areas.** The City shall discourage any new intensive development in any flood hazard area. Similarly, the City shall require appropriate flood mitigation for intensification of existing development in any floodprone area. The City shall not approve development within areas designated as the 100-year floodplain that would obstruct flood flow (such as construction in the designated floodway), displace floodwaters onto other property, or be subject to flood damage. The City shall not allow development that will create or worsen drainage problems.
- **SE 6.6: Enforcement of a Watercourse Setback Ordinance.** A minimum 50-foot setback shall be required from streambanks and flood control channels for all new development (see related CE 2.2). For projects that would be rendered infeasible by the application of such minimum setbacks, the project applicant shall provide a site-specific engineering study with recommended mitigation measures to allow for a reduced setback that would not expose development to unacceptable risk. Furthermore, in these cases, the City shall consult with the Santa Barbara County Flood Control District to determine whether the proposed lesser setback would be appropriate, in that it would allow access for flood control maintenance and enable proper operation of the channels. The City shall maintain and enforce the policies and standards within a Water Course Setback Ordinance.

City of Goleta Municipal Code

Chapter 13.03 of the City's Municipal Code regulates discharges into the City's sewer system. Section 13.03.050(K) prohibits any stormwater, surface water, groundwater, roof runoff, subsurface drainage, or uncontaminated process water from being discharged into the City's sewer system.

Chapter 13.04 of the City's Municipal Code requires all new development and redevelopment projects to comply with the post-construction stormwater management requirements contained in the County's *Stormwater Technical Guide for Low Impact Development*. In addition, this chapter states persons conducting industrial or construction activities that result in discharges subject to an NPDES permit may be required to provide proof of compliance to the Director of the City's Public Works Department, subject to the Director's discretion.

Development in Goleta must regulate stormwater flows during grading in accordance with Chapter 15.09, *Grading, Erosion, and Sediment Control*, of the City's Municipal Code. The requirements of Chapter 15.09 are applicable to all lands within Goleta. Pursuant to 15.09.290, an applicant must submit an erosion and sediment control plan in order to obtain grading permits which must incorporate applicable City-approved BMPs to reduce erosion. If an individual development requires preparation of an SWPPP the City may accept the SWPPP if it contains the City's required elements of an erosion and sediment control plan. Pursuant to Section 15.09.290 of the Municipal Code, the erosion and sediment control plan shall contain the following:

- A delineation and brief description of the proposed practices to retain sediment on the site, including sediment basins and silt traps, and a schedule for their maintenance;
- The location and a brief description of the surface runoff and erosion control practices to be implemented, including types and methods of applying mulches, hydro seeding, or other slope stabilization methods; construction material and waste management practices to be used, including temporary borrow and waste disposal areas, temporary debris and garbage disposal, and chemical/fuel storage areas;
- A brief description of the vegetative practices to be used, including toes of seeds and fertilizer and their application rates, dates of seeding and a schedule for maintenance and upkeep, including irrigation;
- A brief description of reasonable precautionary measures to ensure that vehicles do not track or spill earth materials into public streets and actions necessary to remove such materials if the materials are spilled or tracked; and
- Drainage, erosion and sediment control plans shall include best management practices for control of pollutants from onsite stormwater discharges and nonstormwater discharges, such as discarded building materials, litter, sanitary waste, and the washout of excess construction materials, including, but not limited to, drywall, grout, gypsum, plaster, mortar and concrete. Water contaminated with washout pollutants shall be collected and controlled and shall be removed from the site.

Furthermore, an erosion and sediment control plan is required to specify which erosion control measures necessary to control runoff shall be in place during the rainy season (November 1st through April 15th) and which measures shall be in place year-round. At a minimum, during the rainy season no grading shall occur unless approved erosion and sediment control measures are implemented. Erosion and sediment control measures shall be in place prior to any grading on hillsides, sloping or mountainous terrain. Measures for non-stormwater construction site discharge control shall be implemented year-round. Pursuant to Section 15.09.310, the Director of the Planning and Environmental Services Department or authorized representative may implement a stop work order where there is reason to believe the requirements of Chapter 15.09 are not being upheld.

Pursuant to Chapter 15.10, *Floodplain Management*, development in Goleta must obtain a development permit if the development would be sited in a flood hazard area as identified by FEMA. In order to obtain a development permit, an applicant is required to submit the following for submittals which propose development within any A or V zones identified by FEMA:

- Proposed elevation in relation to mean sea level, of the lowest floor (including basement) of all structures. In zone AO, elevation of highest adjacent grade and proposed elevation of lowest floor of all structures.
- Proposed elevation in relation to mean sea level to which any structure will be floodproofed;

- All appropriate certifications listed in Section 15.10.150(D)(1); and
- Description of the extent to which any watercourse will be altered or relocated as a result of proposed development.

Section 15.10.150(D)(1) requires certification that a proposed development has the lowest floor, including basement, elevated two feet above the base flood elevation[3]. In addition to the above requirements, an applicant must also demonstrate the development would meet the standards of construction identified in Section 15.10.160 of the City's Municipal Code. These include standards related to anchoring, the use of specific construction materials and methods, and elevation and floodproofing requirements.

4.9.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The proposed project's impacts to hydrology and water quality are evaluated based on the proposed project's adherence to local, state, and federal regulations; the proposed project design; the proposed demolition, grading, and groundwater dewatering activities during construction; proposed operational activities; changes in pre- and post-stormwater flows; flood control requirements; and proposed BMPs for control of surface runoff and reduction of pollutants in stormwater runoff. Additionally, a discussion of sea level rise is provided for informational purposes only.

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on hydrology and water quality. Would the project:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
   i) Result in a substantial erosion or siltation on- or off-site;
   ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
   iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
   iv) impede or redirect flood flows;

[3] The base flood elevation is defined by FEMA as a flood having a one percent chance of being equaled or exceeded in any given year. This is the regulatory standard also referred to as the "100-year flood."

4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

In addition, the County of Santa Barbara's 2021 *Environmental Thresholds and Guidelines Manual* provides the following significance thresholds. A significant water quality impact is presumed to occur if a project:

1. Is located within an urbanized area of the County and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;
2. Increases the amount of impervious surfaces on a site by 25 percent or more;
3. Results in channelization or relocation of a natural drainage channel;
4. Results in removal or reduction of riparian vegetation or other vegetation (excluding non-native vegetation removed for restoration projects) from the buffer zone of any streams, creeks or wetlands;
5. Is an industrial facility that falls under one or more of categories of industrial activity regulated under the NPDES Phase I industrial stormwater regulations (facilities with effluent limitation; manufacturing; mineral, metal, oil and gas, hazardous waste, treatment or disposal facilities; landfills; recycling facilities; steam electric plants; transportation facilities; treatment works; and light industrial activity);
6. Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB) Basin Plan or otherwise impairs the beneficial uses of a receiving waterbody;
7. Results in a discharge of pollutants into an "impaired" waterbody that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
8. Results in a discharge of pollutants of concern to a receiving waterbody, as identified by the RWQCB.

As required by the City's adopted *Environmental Thresholds and Guidelines Manual*, all projects determined to have a potentially significant stormwater quality impacts must prepare and implement a SWQMP to reduce the impact. The SWQMP must include the following:

1. Identification of potential pollutant sources that may affect the quality of the discharges to stormwater;
2. The proposed design and placement of structural and non-structural BMPs to address identified pollutants;
3. A proposed inspection and maintenance program; and
4. A method of ensuring maintenance of all BMPs over the life of the project.

Per the *Environmental Thresholds and Guidelines Manual*, implementation of BMPs identified in the SWQMP generally will be considered to reduce impacts to stormwater quality to a less than significant level. The *Stormwater Control Plan* (Appendix J) prepared for the proposed project serves as the required SWQMP.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HYD-1 DEMOLITION OF EXISTING FACILITIES AND CONSTRUCTION AND OPERATION OF THE PROJECT COULD DEGRADE WATER QUALITY THROUGH INCREASED RATES OF EROSION, SEDIMENTATION, AND DISCHARGE OF POLLUTANTS, PARTICULARLY DURING WORK WITHIN SAN JOSE CREEK. WITH IMPLEMENTATION OF MITIGATION MEASURES GEO-1, HAZ-3, AND BIO-3, WATER QUALITY IMPACTS WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

Construction

The proposed project would involve the demolition of an existing freestanding movie screen, concessions stand, projector building, two drive-up ticket booths, one walk-in ticket booth, and an agricultural box. As discussed in Section 4.8, *Hazards and Hazardous Materials,* on-site structures may contain asbestos and lead-based paint. Demolition activities have the potential to release these pollutants into on-site soils, where they could then be transported off-site in stormwater runoff during storm events. The SWRCB's Construction Stormwater General Permit includes requirements for projects to address demolition-related pollutants. In compliance with these requirements, the SWPPP would specify BMPs to control the discharge of pollutants associated with demolition, including asbestos and lead. In addition, demolition activities would be required to be scheduled when there is a low probability of precipitation. Compliance with the Construction Stormwater General Permit, including implementation of the required SWPPP and construction BMPs, would minimize pollutant discharge during demolition.

Construction activities would disturb approximately 6.75 acres of land. Grading operations would increase the potential for erosion and sedimentation. If grading activities occur during the rainy season, or in the event of heavy storms, soils from the site could be entrained, eroded, and transported off-site. In addition, chemicals, liquid products, petroleum products, and concrete-related waste may be spilled or leaked and have the potential to be transported off-site via stormwater runoff. Pursuant to the County's adopted *Environmental Thresholds and Guidelines Manual*, disturbance of one or more acres of land or uncontrolled discharges of sediment or other pollutants are considered to have a significant impact to water quality.

Construction projects of one or more acres are subject to the requirements of the Construction Stormwater General Permit, which requires preparation and implementation of a SWPPP to control the discharges of pollutants, including sediment, into local surface water drainages. The SWPPP would specify the storm water monitoring and construction BMPs required to be implemented to minimize water quality degradation. Construction BMPs would include, but are not limited to, erosion and sediment control BMPs designed to minimize erosion and retain sediment on-site, and good housekeeping BMPs to reduce risk of spills, leaks, and off-site discharge of construction debris and waste.

In addition to NPDES permit requirements, construction activities would be subject to the requirements of Chapter 15.09 of the City's Municipal Code which requires preparation of an erosion and sediment control plan in order to obtain a grading permit. As discussed above, the City accepts a SWPPP in lieu of an erosion control and sediment plan, if the SWPPP contains the requirements of the City's required elements of an erosion and sediment control plan. Accordingly, the SWPPP prepared for the proposed project would include information on proposed BMPs that would be used

during construction to retain sediment on-site, minimize surface runoff and erosion, utilize vegetation for erosion control, and control pollution from on-site stormwater discharges, as well as a summary of precautionary measures to be taken to ensure vehicle use does not result in erosion. Nonetheless, as described in Section 4.6, *Geology and Soils*, soils on the project site are highly erodible, and implementation and maintenance of proper drainage and the stabilization of surface soils, particularly those disturbed during construction, are necessary to reduce the potential for erosion generated during construction to substantially impair water quality of San Jose Creek. Erosion impacts would therefore be potentially significant and mitigation is required.

Construction of the drainage outfall in San Jose Creek channel has the potential to reduce water quality within San Jose Creek. As described in Section 2, *Project Description*, prior to construction, a 400 square-foot temporary staging area would be established in the San Jose Creek bed below the new storm drain outfall. A crane would lower sandbags and plastic sheeting into the creek bed to create a temporary cofferdam to prevent water from entering the work area. The cofferdam would also prevent dirt, concrete rubble, and wet cement from coming into contact with surface water in the creek. No heavy equipment would be used or operated within this staging area in the creek bed, and no vegetation removal would occur. The materials (sandbags and plastic sheeting) used to create the temporary cofferdam from the staging area on the dirt access road or would be carried by hand. Labor crews would use hand tools (i.e., shovels, rakes and brooms, dust pans and wheelbarrows) to collect and remove any debris that falls or washes into the staging area during installation of the buried storm drain outlet pipe and pipe outlet structure. The cofferdam installed in the creek bed staging area would remain in place for the duration of construction and would be removed 10 to 15 days after the concrete has been poured on the creek bank at the detention basin outlet location to allow time for the concrete to cure before coming into contact with tidal surface water. While the cofferdam would provide infrastructure necessary to reduce the potential for construction of the drainage outfall to cause water quality impacts, there is potential that installation of the cofferdam and outfall could result in the introduction of pollutants to San Jose Creek which could impair water quality if installed during the wet season. Therefore, impacts are potentially significant and mitigation is required to ensure the cofferdam is appropriately installed during the dry season to reduce impacts during construction of the outfall.

According to the *Geotechnical Report* prepared for the proposed project (Appendix G), groundwater beneath the project site is approximately 3 to 7.5 feet below ground surface. Therefore it is reasonable to assume that groundwater could be encountered during grading activities. As described in the *Revised Geotechnical Engineering Report Update* prepared for the proposed project (Appendix G) excavating sloping or shoring and groundwater dewatering would be required to safely work during construction of the proposed detention basin and implementation of utility lines. Depending on the quality of the water, drained groundwater could be discharged into San Jose Creek. In this case, coverage under the Limited Threat Discharge Permit would be required to be obtained from the Central Coast RWQCB. Groundwater may contain elevated levels of total dissolved solids, sulfates, iron, manganese or other constituents that could affect surface water quality. Groundwater dewatering would be conducted in accordance with the requirements of the Limited Threat Discharge Permit, which requires testing and treatment, as necessary, of groundwater prior to its release into surface waters to prevent exceedances of effluent limitations and discharge flow rates. However, as described in Section 4.8, *Hazards and Hazardous Materials,* the potential exists that groundwater could be contaminated due to past hazardous material releases from adjacent properties. If contaminated groundwater were encountered, that would preclude use of the Limited Threat Discharge Permit. Therefore, impacts would be potentially significant and mitigation would be required.

Operation

The proposed project is an industrial warehouse that would not store large quantities of hazardous materials. Typical uses would include indoor warehousing and storage, wholesaling and distribution, and construction and material storage. The proposed project does not include vehicle maintenance shops or equipment cleaning operations. The proposed industrial building could be leased to multiple tenants, whose operations could involve the transport, use, and disposal of small quantities of hazardous materials for routine maintenance or cleaning. During operation, oil leaks from vehicles traveling to and from the project site, use of pesticides or fertilizers for landscape maintenance, the leaching of metals from roof and drains, or litter could be carried off-site during storm events and could result in potential water quality impacts.

Because the project site use would be limited to warehouse storage, the proposed project is not subject to the NPDES Phase I industrial stormwater regulations, including the *General Permit for Stormwater Discharges Associated with Industrial Activities* (Industrial General Permit. In accordance with Chapter 13.04 of the City's Municipal Code, the proposed project would utilize Source Control and LID BMPs to detain, retain, and treat runoff consistent with the requirements of the Central Coast RWQCB's Post-Construction Requirements. Furthermore, the Phase II MS4 Permit requires that a SWQMP be prepared for projects that create and/or replace 5,000 or more square feet of impervious surface. SWQMPs specify the operational BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff.

The *Stormwater Control Plan* prepared for the proposed project (Appendix J) serves as the SWQMP and specifies the Source Control and LID BMPs proposed for the project. Source Control BMPs are preventative measures that are implemented to reduce the introduction of pollutants into stormwater. Proposed permanent Source Control BMPs include storm drain inlet signage; preservation of existing trees, shrubs, and groundcover; design of landscaping to minimize irrigation and runoff; installation of pest-resistant plants; provision of designated refuse areas; and provision of a way to drain fire sprinkler test water to the sanitary sewer system.

LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, treat, and discharge runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Proposed LID BMPs include a detention basin, which would capture stormwater runoff from a majority of the project site. The basin would provide stormwater treatment up to two times the 85th percentile storm event (2.6 inches of rainfall)[4]. Discharge from the detention basin would be conveyed to a hydrodynamic separator and then to an 18-inch diameter outfall on the concrete-lined western bank of San Jose Creek. The detention basin and hydrodynamic separator would remove total suspended solids, hydrocarbons, nutrients, metals, and other common pollutants. A portion of stormwater runoff from the project site would be directed to a vegetated drainage swale and then to an existing storm drain outlet equipped with a catch basin inlet filter. The stormwater detention basin, hydrodynamic separation, vegetated drainage swale, and catch basin inlet filter would remove pollutants of concern from stormwater runoff and improve San Jose Creek water quality overall compared to the existing untreated stormwater discharge, would reduce discharge of pollutants of concern, and ensure pollutants would not be discharged into an impaired waterbody. Although groundwater levels at the project site are high, stormwater occurring during operation would be treated and discharged into San Jose Creek, thereby not affecting groundwater quality.

[4] The 85th percentile storm event for a particular location is the amount of rainfall equal to or greater than produced by 85 percent of storms that have occurred in an area over a specified duration, based upon long-term historical records of local storm events.

Although project operation would comply with Central Coast RWQCB requirements, City Municipal Code requirements, and implement Source Control and LID BMPs, the possibility remains erosion during operation could occur, as soils on the project site would remain highly erodible. Implementation of long-term maintenance activities to ensure proper drainage of the project site and the stabilization of surface soils, particularly on the fill slopes, is necessary to reduce the potential of substantial erosion during operation. The project would include BMP maintenance to stabilize soils and minimize erosion, such as plant inspection to ensure plant health and stability and cleaning and replacement of the catch basin filter insert and hydrodynamic separator at the beginning of the rainy season and as-needed after each storm (Appendix J). However, due to the highly erodible on-site soils, additional stabilization measures would be required. Therefore, operational impacts would be potentially significant and mitigation is required.

Mitigation Measures

Mitigation Measure GEO-1, described in Section 4.6, *Geology and Soils,* Mitigation Measure HAZ-3, described in Section 4.8, *Hazards and Hazardous Materials*, and Mitigation Measure BIO-3, described in Section 4.3, *Biological Resources*, are required.

Significance After Mitigation

Existing state and local regulations require implementation of BMPs to minimize and treat pollutants of concern during construction and operation.

Implementation of Mitigation Measure GEO-1 requires the project design engineer to incorporate the recommendations of the *Revised Geotechnical Engineering Report Update* (Appendix G) into the proposed project's building and grading plans. These recommendations include specific measures to control erosion from grading and reduce drainage during construction and operation. Construction measures include, but are not limited to, cleaning fill materials of any debris or rock and backfilling voids created by dislodging cobbles and/or debris during scarification. Operational measures include, but are not limited to, long-term maintenance of pavement areas including sealing any cracks that develop, rodent prevention control, periodic observations for indications of soil instability, and landscaping management to improve soil stabilization during operation. Implementation of these measures would reduce the amount of potential pollutants that could enter San Jose Creek. With implementation of Mitigation Measure GEO-1, potential impacts related to erosion during construction and operation would be less than significant.

Implementation of Mitigation Measure HAZ-3 requires a qualified environmental consultant to conduct groundwater investigation prior to the start of construction and summarize results in a groundwater investigation report. If groundwater contaminants are encountered, the project applicant is required to implement the recommendations specified in the groundwater investigation report to reduce risk of release of contaminated groundwater. If contaminated groundwater is generated during construction, the Central Coast RWQCB or the City shall be consulted to determine if the treated groundwater can be disposed of through one of their waste discharge permit options, or if an individual NPDES and/or waste discharge requirement would be required. The groundwater discharge and disposal requirements vary by agency, location, concentration, and contaminants of concern and would therefore be developed in consultation with the City and/or the Central Coast RWQCB. With implementation of Mitigation Measure HAZ-3, contaminated groundwater would be remediated and disposed of in compliance with Central Coast RWQCB or the City requirements, thereby reducing potential groundwater dewatering impacts to a less than significant level.

Implementation of Mitigation Measure BIO-3 requires construction activities within San Jose Creek to occur when San Jose Creek is dry and no surface water is present in the staging area. In addition, Mitigation Measure BIO-3 requires implementation of a City-approved Toxic Materials Control and Spill Response Plan for materials that may be used on-site during construction. The Toxic Materials Control and Spill Response Plan must specify that cleaning and refueling of equipment and vehicles shall occur only within designated staging areas that are at least 100 feet from San Jose Creek and Old San Jose Creek. Furthermore, all hazardous material transport, use, or disposal associated with the proposed project would comply with existing hazardous materials regulations established by the USEPA, the State of California, the County of Santa Barbara, and the City of Goleta. With implementation of Mitigation Measure BIO-3, potential short-term water quality impacts associated with construction in San Jose Creek would be less than significant.

Threshold 2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact HYD-2 THE PROPOSED PROJECT WOULD REQUIRE MINIMAL GROUNDWATER EXTRACTION DURING GROUNDWATER DEWATERING ACTIVITIES AND WOULD NOT SUBSTANTIALLY DECREASE INFILTRATION RATES ON-SITE. THE PROPOSED PROJECT WOULD BE SUPPLIED WATER BY THE GOLETA WATER DISTRICT IN ACCORDANCE WITH THE REQUIREMENTS OF THE WRIGHT JUDGEMENT. IMPACTS TO GROUNDWATER WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

According to the *Revised Geotechnical Engineering Report Update* prepared for the proposed project, groundwater dewatering activities would be required in order to lower the localized groundwater level, ranging from approximately 3 to 7.5 feet below the existing ground surface, for safety during excavation and grading activities (Appendix G). Groundwater dewatering activities would be temporary and short-term, lasting only during construction of the detention basin and excavations required to insert utility connections. Infiltration on site is not feasible due to the high groundwater level underlying the project site. Accordingly, drained groundwater could not feasibly recharge the Basin. Although groundwater dewatering activities would result in a decrease in groundwater supplies, the decrease would be localized and minimal, for a short duration occurring during construction of the detention basin and excavations for the new utility connections. The anticipated length of time construction activities are expected to occur would not result in substantial groundwater losses in the Basin or result in changes which prohibit groundwater infiltration on-site compared to existing conditions. Therefore, construction of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

The project site currently has 188,963 square feet of impervious surface area. With implementation of the proposed project, this impervious surface area would be reduced by 4,420 square feet to 184,543 square feet (Appendix J). Due to the project site's low permeability soils and high groundwater elevation, infiltration is infeasible at the project site (Appendix H). Therefore, the proposed project would not result in substantial interference to groundwater recharge.

Operation of the proposed project would not require groundwater extraction on the project site. As described in Section 4.14, *Utilities and Service Systems*, water demand for the proposed project would be met by GWD which sources its water, in part, from the Goleta Basin. GWD is subject to the adjudication requirements of the Wright Judgement, and the proposed project would not interfere with the management of the Basin in accordance with the Wright Judgement due to its water demands because GWD is only permitted to extract water in accordance with the allocations determined by the Wright Judgement. In addition, based on the *Preliminary Water Service*

Determination (Appendix L) GWD has determined the project site has adequate historic water credit for its forecasted demand associated with the proposed project. Furthermore, GWD has anticipated adequate water supplies to be available through the year 2040 (GWD 2021). Existing regulatory measures requiring water conservation during times of drought prevent the overdraft of the Basin that GWD would use to supply water demand of the proposed project. Therefore, the proposed project would not substantially decrease water supplies or conflict with or obstruct a sustainable groundwater management plan. These impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3(i): Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?

Impact HYD-3 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE PROJECT SITE, IN A MANNER WHICH COULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE. IMPLEMENTATION OF MITIGATION MEASURE GEO-1 WOULD BE REQUIRED, AND IMPACTS WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

Construction

As discussed under Impact HYD-1, construction activities would disturb approximately 6.75 acres, which would increase the potential for erosion and sedimentation. Construction activities would be required to comply with the Construction Stormwater General Permit, the Limited Threat Discharge Permit, the City Municipal Code, as well as implementation of the required SWPPP and construction BMPs would minimize pollutant discharge in stormwater runoff. However, even with adherence to regulatory requirements, construction activities could alter the existing drainage pattern of the site such that substantial erosion and siltation could occur. Accordingly, construction activities could result in a potentially significant impact related to drainage patterns and erosion and mitigation is required.

Operation

As discussed in the *Stormwater Control Plan* (Appendix J), the project site currently has 188,963 square feet of impervious surface area. With implementation of the proposed project, this impervious surface area would be reduced to 184,543 square feet. The project site has topography similar to a bowl, with drainage flows directed to two existing stormwater pumps which discharge through the San Jose Creek Channel levee into San Jose Creek. The pumps are currently used for conveying stormwater and do not pump groundwater. The proposed project would retain one of the two existing stormwater pumps located southwest of the proposed detention basin adjacent to San Jose Creek. As described in Section 2, *Project Description*, stormwater runoff a majority of the project site consisting of the paved and landscaped areas of the parking lot and southern portion of the development area would be directed to the detention basin constructed at the southern border of the development area. Treated stormwater within the detention basin would be conveyed to a proposed 18-inch diameter outfall on the concrete-lined western bank of San Jose Creek. Excess stormwater would be discharged via an overflow weir constructed approximately 1.6 feet above the

100-year storm water surface elevation to the existing stormwater pump located southwest of the proposed detention basin. The proposed detention basin has been sized to reduce the post-project peak runoff to less than the pre-project peak runoff for a 2-year to 100-year flood event (Appendix H). Specifically, stormwater runoff would be reduced from 11.5 cfs to 4.01 cfs for a 2-year storm event and from 38.05 cfs to 13.39 cfs for a 100-year storm event. Accordingly, discharge to San Jose Creek would be reduced, which would therefore not increase erosion in the unlined portions of the creek downstream of the project site. However, as described in Impact HYD-1, soils on the project site would remain highly erodible during operation, and if long-term maintenance activities to ensure proper drainage of the project site are not implemented, there is potential that operation of the proposed project could alter the drainage pattern of the project site such that increased erosion could occur. Therefore, this impact would be potentially significant and mitigation is required.

Mitigation Measure

Implement Mitigation Measure GEO-1, described in Section 4.6, *Geology and Soils*.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 requires the project design engineer to incorporate the recommendations of the *Revised Geotechnical Engineering Report Update* (Appendix G) into the proposed project's building and grading plans. These recommendations include specific measures to control erosion from grading and reduce drainage during construction and operation, thereby reducing potential water quality impacts associated with erosion to a less than significant level.

Threshold 3(ii): Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Impact HYD-4 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE PROJECT SITE IN A MANNER WHICH COULD RESULT IN FLOODING ON- OR OFF-SITE. IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Construction

As discussed in Impact HYD-1, construction would comply with the requirements of the Construction Stormwater General Permit, including the preparation and implementation of a SWPPP. The SWPPP would include construction BMPs to control and direct on-site surface runoff. Construction would not include activities which could result in the channelization of San Jose Creek or relocation of a natural drainage bed which could increase the rate of surface water runoff. Therefore, construction activities would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. This impact would be less than significant.

Operation

As described in Impact HYD-1, the proposed project would reduce the amount of impervious surfaces at the project site by approximately 4,420 square feet and include a detention basin, overflow weir, drainage outfall, and vegetated drainage swale. As detailed in the *Preliminary Drainage Design* (Appendix H), the detention basin would reduce stormwater flows by 7.54 cubic feet per second and

24.56 cubic feet per second, for the 2-year and 100-year storm events, respectively, as compared to existing conditions. Because stormwater runoff from the project site would be reduced to below that of existing conditions, the proposed project would not result in off-site flooding. Additionally, the proposed overflow weir, drainage outfall, and vegetated drainage swale, and stormwater LID BMPs would be sized to collect and convey stormwater runoff on the project site such that and increase in on-site flooding compared to existing conditions would not occur. The proposed project would not result in the channelization of San Jose Creek or relocation of a natural drainage bed which could increase the rate of surface water runoff. Therefore, project operation would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in flooding on or off site. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3(iii): Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Impact HYD-5 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD NOT RESULT IN RUNOFF WATER THAT EXCEEDS THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS. HOWEVER, CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD ALTER THE EXISTING DRAINAGE PATTERN OF THE PROJECT SITE IN A MANNER THAT COULD PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF. IMPLEMENTATION OF MITIGATION MEASURE GEO-1, BIO-3, AND HAZ-3 WOULD BE REQUIRED, AND IMPACTS WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

Construction

As described in Impact HYD-3, construction would comply with several regulations intended to control stormwater runoff and reduce pollutants and ensure construction activities would not result in substantial runoff water which would exceed the capacity of San Jose Creek. These include the required SWPPP and construction BMPs that would direct and manage stormwater to minimize impacts to the capacity of San Jose Creek. However, even with adherence to regulatory requirements, construction activities could result in additional sources of polluted runoff due to construction within San Jose Creek and/or groundwater dewatering activities. This impact would be potentially significant and mitigation is required.

Operation

As described in Impact HYD-1 and Impact HYD-4, the proposed detention basin would provide stormwater treatment up to two times the 85th percentile storm event (2.6 inches of rainfall). The basin would reduce stormwater flows discharged to San Jose Creek compared to existing conditions. Because stormwater runoff from the project site would be reduced to below that of existing conditions, the proposed project would not result in an exceedance of the capacity of existing or planned stormwater drainage systems. Furthermore, the proposed detention basin, hydrodynamic separator, vegetated swale, and catch basin inlet filter would treat stormwater prior to discharge, ensuring operation of the proposed project would not provide substantial additional sources of

polluted runoff. Nonetheless, soils on the project site would remain highly erodible, and unstable surface soils could result in polluted runoff water during project operations, particularly on fill slopes. Implementation of long-term maintenance activities to ensure proper drainage and the stabilization of surface soils are necessary to reduce the potential of polluted runoff during operation. This impact would be potentially significant and mitigation is required.

Mitigation Measures

Mitigation Measure GEO-1, described in Section 4.6, *Geology and Soils*, Mitigation Measure BIO-3, described in Section 4.3, *Biological Resources*, and Mitigation Measure HAZ-3, described in Section 4.8, *Hazards and Hazardous Materials*, are required.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 requires the project design engineer to incorporate the recommendations of the *Revised Geotechnical Engineering Report Update* (Appendix G) into the proposed project's building and grading plans. These recommendations include specific measures to control erosion from construction and operation. Construction measures include, but are not limited to, cleaning fill materials of any debris or rock and backfilling voids created by dislodging cobbles and/or debris during scarification. Operational measures include, but are not limited to, long-term maintenance of pavement areas including sealing any cracks that develop, and rodent prevention control. Implementation of these measures would reduce the amount of potential pollutants that could enter San Jose Creek. With implementation of Mitigation Measure GEO-1, potential impacts related to erosion during construction and operation would be less than significant.

Implementation of Mitigation Measure BIO-3 requires construction activities within San Jose Creek to occur when San Jose Creek is dry and no surface water is present in the staging area. In addition, Mitigation Measure BIO-3 requires implementation of a City-approved Toxic Materials Control and Spill Response Plan for materials that may be used on-site during construction, such as petroleum-based products, fuel and lubricants, and other potentially toxic materials. The Toxic Materials Control and Spill Response Plan must specify that cleaning and refueling of equipment and vehicles during construction shall occur only within designated staging areas that are at least 100 feet from San Jose Creek and Old San Jose Creek. With implementation of Mitigation Measure BIO-3, potential short-term polluted runoff impacts associated with construction in San Jose Creek would be less than significant.

Implementation of Mitigation Measure HAZ-3 requires a qualified environmental consultant to conduct groundwater investigation prior to the start of construction and summarize results in a groundwater investigation report. If groundwater contaminants are encountered, the project applicant is required to implement the recommendations specified in the groundwater investigation report to reduce risk of release of contaminated groundwater. If contaminated groundwater is generated during construction, the Central Coast RWQCB or the City shall be consulted to determine if the treated groundwater can be disposed of through one of their waste discharge permit options, or if an individual NPDES and/or waste discharge requirement would be required. With implementation of Mitigation Measure HAZ-3, contaminated groundwater would be remediated and disposed of in compliance with Central Coast RWQCB or the City requirements, thereby reducing potential groundwater dewatering impacts to a less than significant level.

Threshold 3(iv):	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Impact HYD-6 THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE PROJECT SITE IN A MANNER WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS. IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Flooding

As described in Section 4.9.1a, the project site is designated Zone A by FEMA Flood Insurance Rate Map No. 06083C1362H, while San Jose Creek is a mapped regulatory floodway (Appendix M). Although the project site is mapped as being located within a 100-year floodplain, the project site is not currently inundated by 100-year flood flows in the existing condition. Rain and stormwater that fall onto the project site flow from north to south toward two existing sump pumps which discharge into San Jose Creek. Off-site rain and stormwater does not enter the project site due to the presence of an existing earthen berm around the project site. The berm prevents 100-year flood flows from entering the project site. However, the berm lacks the characteristics required to meet the definition of an accredited levee recognized by FEMA. The FEMA map depicts the project site as located within a 100-year floodplain even though the site, in its current condition, would not be inundated by the 100-year flood due to the presence of the berm (Appendix M).

As stated in Section 2, *Project Description,* the proposed project would include the addition of fill within the development area to direct drainage flows by gravity to the San Jose Creek channel. The project site has topography similar to a bowl, with drainage flows directed to two existing stormwater pumps which discharge through the San Jose Creek Channel levee into San Jose Creek. The pumps are used for conveying stormwater and do not pump groundwater. The proposed project would retain one of the two existing stormwater pumps located southwest of the proposed detention basin adjacent to San Jose Creek. Although the project site in its current condition would not be inundated by 100-year flood flows, additional flood-proofing design measures are required because the berm is not an accredited levee recognized by FEMA. Flood-proofing measures include the use of between 4 to 6 feet of fill to elevate the proposed building above the 100-year floodplain elevation, as required by Section 15.10.160 of the City's Municipal Code. The proposed project would also be required to be certified by a registered professional engineer or architect that the City's floodplain development standards, identified in Chapter 15.10 of the Municipal Code. This certification would be provided to the City's floodplain administrator for review and approval, pursuant to Section 15.10.160(C)(3). In the event of a 100-year flood event, stormwater flows on the project site would be conveyed to either the proposed detention basin, overflow weir and existing stormwater pump, existing storm drain outlet, or proposed vegetated drainage swale for eventual discharge into San Jose Creek. The project site would not be inundated by 100-year flood flows; therefore, the proposed project would not redirect flood flows on-site. Furthermore, because the proposed project would direct stormwater flows to San Jose Creek, the introduction of fill material for the proposed project would not substantially alter off-site flooding or drainage because currently, because of the earthen berm, flood water from the project site does not discharge to surrounding parcels. The proposed project would not increase flood flows to San Jose Creek (Appendix J); therefore, the proposed project would not affect flood flows within San Jose Creek. The proposed project would not change the flood carrying capacity of the project site, permanently alter a watercourse, or raise flood elevations (Appendix M).

Due to the existing flood protection offered by the earthen berm, project design, and compliance with City requirements governing development within a floodplain, the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. Impacts would be less than significant.

Sea Level Rise

As described in Section 4.9.1a, as a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association [CBIA*] v. *Bay Area Air Quality Management District [BAAQMD]*, 62 Cal. 4th 369 [No. S 213478] issued December 17, 2015), it is not considered the purview of the CEQA process to evaluate the impact of existing environmental conditions on a proposed project. Therefore, this discussion of sea level rise is provided solely for informational purposes.

The *Sea Level Rise and Coastal Hazards Analysis* (Appendix N) presents results of the sea level rise and coastal hazard analysis for the proposed project. The analysis considers the scenario where the sea level rises by 6.6 feet by the year 2100 based on guidance from the California Coastal Commission. A scenario of 6.6 feet sea level rise in the year 2100 is consistent with a Medium-High Risk Averse Scenario and was chosen because the proposed project is an industrial structure with lower ability to adapt to sea level rise, but does not present a considerable public health, public safety, or environmental impact should that level of sea level rise occur. Additionally, since the expected life of an industrial structure such as the proposed Project is about 75 years, the analysis conservatively analyzed the projected sea level rise for the year 2100 (Appendix N). This scenario represents a reasonable worst-case scenario for sea level rise at the project site.

As described in the *Flooding* discussion above, the project site would not currently be inundated by a 100-year storm event (Appendix M). As presented in Section 4.1 of Appendix N, with or without the proposed project, during a 100-year storm event with 6.6 feet of sea level rise, the 100-year floodplain elevation in San Jose Creek would rise to approximately 14.78 feet. As a result, the project site would be inundated because the berm would be below the projected water level elevation. Flood waters would pool in the southern portion of the development area due to the bowl shape of the site that concentrates flooding water that makes it difficult for stormwater to drain from the project site. The existing stormwater pump would pump flood waters into San Jose Creek. With the proposed project, the industrial building would not be inundated because the industrial building would be elevated above the anticipated water surface elevation of 14.78 feet.

However, in the northeastern most portion of the project site, the access road to the proposed industrial building, San Jose Creek maintenance road, and the creek's bank would below the water level elevation during a 100-year storm event. Therefore, should the worst-case 100-year water level elevation of 14.78 feet occur within San Jose Creek, the northern portion of the access road to the proposed industrial building would be inundated, potentially preventing access to the proposed industrial building. Recommendations provided by Appendix N include 1) raising the northeastern portion of the project site to at least 15 feet North American Vertical Datum 1988 or 2) ensuring the City of Goleta coordinates with the County of Santa Barbara to increase the height of San Jose Creek's bank at this portion of the Project site to an elevation higher than the estimated 1 percent design water level elevation. The lower elevation of the San Jose Creek bank is required for maintenance access to San Jose Creek; therefore, if the creek bank is raised, alternative maintenance access would be required.

The City will incorporate the recommendations into the proposed project's conditions of approval, which would require the applicant to monitor future sea level rise and flood levels within San Jose Creek, and construct on-site flood control measures as determined appropriate by the City and other Responsible Agencies including but not limited to elevating the access road to the proposed industrial building above the 100-year floodplain elevation and continuing to provide maintenance access to San Jose Creek (e.g., constructing a levee, etc.). These actions would serve as preventative measures to minimize inundation by flood flows, should flooding occur at future date. As part of the condition of approval, the potential effects of sea level rise on the proposed project would be evaluated 50 years after the start of construction in conjunction with the Santa Barbara County Flood Control District.

As noted above, the analysis is based on a conservative, worst-case scenario in 2100; therefore, the condition of approval would only be implemented should sea level rise reach a level that inundates the project site. Therefore, implementation of the remedial measures enforced by the condition of approval may not be required and are therefore not reasonably foreseeable. Due to the uncertainty regarding the need for remedial measures, the uncertainty of the specific details, locations, and timing of construction of remedial measures necessitated by sea level rise, the potential environmental impacts associated with these remedial measures are speculative. Pursuant to CEQA Guidelines Section 15145, if an environmental impact is too speculative, it need not be evaluated. Therefore, a discussion of potential environmental impacts associated with the remedial measures required by the condition of approval is not included herein.

Overall, the condition of approval would minimize the potential for sea level rise to result in an impediment or redirection of flood flows at the project site.

Mitigation Measures

No mitigation measures are required.

Threshold 4: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impact HYD-7 THE PROPOSED PROJECT WOULD NOT RISK THE RELEASE OF POLLUTANTS DUE TO INUNDATION IN A FLOOD HAZARD, TSUNAMI, OR SEICHE ZONE. IMPACTS WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

As described in Section 4.9.1a, the project site is located outside the tsunami hazard zone as designated in the Tsunami Hazard Area Map for the County of Santa Barbara (Appendix N) and therefore is not subject to inundation from tsunami. Due to the absence of a large body of water such as a reservoir in proximity to the project site, the project site is not subject to inundation from seiche.

As described in Impact HYD-6, the project site is designated Zone A by FEMA Flood Insurance Rate Map No. 06083C1362H, while San Jose Creek is a mapped regulatory floodway (Appendix M). Rain and stormwater that falls outside of the project site does not enter the project site due to the presence of an existing earthen berm around the project site. The berm is considered by FEMA because the berm lacks the characteristics required to meet the definition of an accredited levee recognized by FEMA. The FEMA map depicts the project site as located within a 100-year floodplain even though the site, in its current condition, would not be inundated by the 100-year flood (Appendix M). In accordance with Chapter 15.10 of the Municipal Code, the proposed industrial building would be elevated two feet above the 100-year flood elevation which would be certified by a registered professional engineer or architect and provided to the City's floodplain administrator for review and

approval. Accordingly, in the event the earthen berm fails, pollutants would not be released because the proposed industrial building would be elevated above the 100-year flood elevation. With incorporation of proposed project design features and adherence to City regulations regarding floodplain development, the proposed project would not risk release of pollutants due to inundation from a flood. Existing state and local regulations require implementation of BMPs to minimize and treat pollutants of concern during construction and operation. Furthermore, Mitigation Measure GEO-1 would further reduce the potential for pollutant release by requiring operational measures such as long-term maintenance of pavement areas, including sealing any cracks that develop, and rodent prevention control.

The project site is located within the inundation zone of the Rancho Del Ciervo dam. The potential for dam failure is low as the Rancho Del Ciervo dam has been constructed in accordance with specifications set forth by state agencies. DWR inspects dams on an annual basis to identify any issues and ensure the continued safety of a dam's operation (DWR 2024). The proposed project does not include any features which would preclude the routine inspection of dams or otherwise increase the risk for dam failure and inundation. As described above, the proposed project would be constructed in accordance with the City's floodplain development requirements to reduce the potential for pollutant release during inundation. Therefore, potential impacts related to the risk of pollutant release due to inundation from Rancho Del Ciervo dam are less than significant.

Mitigation Measure

Mitigation Measure GEO-1, described in Section 4.6, *Geology and Soils*.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 requires the project design engineer to incorporate the recommendations of the *Revised Geotechnical Engineering Report Update* (Appendix G) into the proposed project's building and grading plans. These recommendations include specific measures to minimize the release of stormwater pollutants and control erosion, such as long-term maintenance of pavement areas including sealing any cracks that develop, rodent prevention control, periodic observations for indications of soil instability, and landscaping management to improve soil stabilization during operation. Implementation of these measures would reduce the amount of potential pollutants that could be released in the event of flood inundation. With implementation of Mitigation Measure GEO-1, potential impacts related to pollutant release as a result of inundation during construction and operation would be less than significant.

Threshold 5:	Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-8 THE PROPOSED PROJECT WOULD BE SUBJECT TO REGULATORY REQUIREMENTS WHICH WOULD MINIMIZE THE POTENTIAL TO IMPAIR WATER QUALITY. IN ADDITION, THE PROPOSED PROJECT WOULD IMPLEMENT MITIGATION MEASURES GEO-1, HAZ-3, AND BIO-3 TO REDUCE POTENTIAL WATER QUALITY IMPACTS RELATED TO CONSTRUCTION. THESE MEASURES WOULD ENSURE THE PROPOSED PROJECT WOULD NOT CONFLICT WITH THE CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD'S BASIN PLAN. THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT GROUNDWATER MANAGEMENT REQUIREMENTS WHICH THE GOLETA WATER DISTRICT FOLLOW. THEREFORE, THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN. THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

The Basin Plan, adopted by the Central Coast RWQCB, is the water quality control plan applicable to the project site. The Basin Plan establishes implementation programs to achieve water quality objectives to protect beneficial uses. As described in Impact HYD-1, construction and operation of the proposed project would be conducted in compliance with applicable regulatory requirements related to stormwater runoff to minimize the potential for pollutants to degrade water quality. These include the Construction Stormwater General Permit, *the Limited Threat Discharge Permit, the* Central Coast RWQCB's Post-Construction Requirements, the County's *Stormwater Technical Guide for Low Impact Development,* and Chapter 13.04 and Chapter 15.09 of the City's Municipal Code. In accordance with these permits the proposed project would be required to implement a SWPPP, construction BMPs, SWQMP, Source Control BMPs, and LID BMPs to reduce the potential for the proposed project to degrade water quality. However, the proposed project has the potential to result in water quality impacts related to erosion, construction in San Jose Creek, and groundwater dewatering, which could conflict with the goal of the Basin Plan. Therefore, impacts would be potentially significant and mitigation is required.

The project site overlies the adjudicated portion of the Goleta Groundwater Basin and therefore not subject to the requirements of SGMA. GWD's *Groundwater Management Plan Goleta Groundwater Basin* (2022) serves as the guiding document for GWD to manage groundwater in accordance with the Wright Judgement (GWD 2023). As described in Impact HYD-2, the proposed project would not adversely impact groundwater supplies, and the proposed project would not interfere with the management of the Goleta Groundwater Basin in accordance with the Wright Judgement. As described in Section 4.15, *Utilities and Service Systems,* GWD has anticipated adequate water supplies to be available through the year 2040 (GWD 2021). Existing regulatory measures requiring water conservation during times of drought prevent the overdraft of groundwater that GWD would use to supply the demand induced by the proposed project. Furthermore, as discussed in Section 4.15, *Utilities and Service Systems,* GWD has determined the project site has adequate historic water credit for the forecasted demand associated with the proposed project (Appendix L). Therefore, the proposed project would not conflict with or obstruct a sustainable groundwater management plan and impacts would be less than significant.

Mitigation Measures

Implement Mitigation Measure GEO-1, described in Section 4.6, *Geology and Soils,* Mitigation Measure HAZ-3, described in Section 4.8, *Hazards and Hazardous Materials*, and Mitigation Measure BIO-3, described in Section 4.3, *Biological Resources*.

Significance After Mitigation

Existing state and local regulations require implementation of BMPs to minimize and treat pollutants of concern during construction and operation. The proposed project would implement Mitigation Measures GEO-1, HAZ-3, and BIO-3 in order to reduce potential surface water quality impacts related to erosion, groundwater dewatering, and construction within San Jose Creek. With implementation of Mitigation Measures GEO-1, HAZ-3, and BIO-3, the proposed project would reduce potential water quality impacts associated with erosion during construction, groundwater dewatering, and construction in San Jose Creek to a less than significant level.

4.9.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts that would occur from impacts of reasonably anticipated projects identified in Table 3-1 of Section 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this EIR is discussed in Section 3, *Environmental Setting*.

Water Quality, Drainage, and Sedimentation

Cumulative development in Goleta would increase impervious surfaces, redirect the drainage of surface flow during storm events, and increase pollutant loading, peak flows, erosion, sedimentation, and flooding. For the cumulative analysis related to hydrology and water quality, cumulative projects being considered include the projects discharging to the same watershed as the proposed project (i.e., San Jose Creek). As described in Section 4.9.1a, San Jose Creek is impaired by a variety of pollutants, including chloride, fecal coliform, E. coli, and excessive salinity. The Kellog Crossing Self Storage (Formerly Schwan Self Storage), Security Paving (former Highway Recycling), and Hollister Avenue Bridge Relocation projects, described in Table 3-1 of Section 3, *Environmental Setting*, are examples of cumulative projects that would also potentially discharge stormwater runoff to San Jose Creek and could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff discharged to San Jose Creek, thereby resulting in cumulative impacts to hydrology and surface water quality. Cumulative projects would be required to comply with federal, state, and City water quality requirements, such as the Construction Stormwater General Permit, Low Threat Discharge Permit, Post-Construction Requirements, the Phase II MS4 Permit, and Chapter 13.04 of the City's Municipal Code. Further, cumulative projects would be required to implement mitigation if, due to project-specific circumstances, a potential impact to water quality could occur. However, the proximity of cumulative development to San Jose Creek could continue to result in continued impairment of San Jose Creek.

The proposed project's demolition activities would be required to obtain coverage from the SWRCB's Construction Stormwater General Permit, which includes requirements for projects to address demolition-related pollutants. Construction of the proposed project would also be required to obtain coverage from the Construction Stormwater General Permit, which requires preparation and implementation of a SWPPP to control the discharges of pollutants, including sediment, into local surface water drainages through implementation of erosion and sediment control BMPs and good housekeeping BMPs. Construction would also obtain coverage from the Low Threat Discharge Permit, which requires testing and treatment, as necessary, of groundwater prior to its release into surface waters to prevent exceedances of effluent limitations and discharge flow rates. Groundwater dewatering would comply with Mitigation Measure HAZ-3 which requires investigation of potential contaminated groundwater and consultation with the Central Coast RWQCB or the City if contaminated groundwater is identified. Construction activities would also comply with Mitigation Measure GEO-1, which includes implementation of specific measures to control erosion from grading

and reduce drainage consistent with the recommendations of the *Revised Geotechnical Engineering Report Update* (Appendix G). In addition, construction activities would comply with Mitigation Measure BIO-3 requires implementation of a Toxic Materials Control and Spill Response Plan during construction. The Toxic Materials Control and Spill Response Plan will require that cleaning and refueling of equipment and vehicles during construction only occur within designated staging areas that are at least 100 feet from San Jose Creek and Old San Jose Creek. During operation, the proposed project would comply with Chapter 13.04 of the City's Municipal Code by utilizing Source Control and LID BMPs to detain, retain, and treat runoff consistent with the requirements of the Central Coast RWQCB's Post-Construction Requirements and the County's *Stormwater Technical Guide for Low Impact Development*. Furthermore, the proposed project would implement design features in the *Stormwater Control Plan* prepared for the proposed project (Appendix J), which serves as the SWQMP for the proposed project. Compliance with these existing regulations to protect water quality, as well as adherence to Mitigation Measures GEO-1, HAZ-3, and BIO-3, would ensure the proposed project's contribution to cumulative water quality impacts would not be cumulatively considerable.

Groundwater

Cumulative projects that are provided water by GWD would increase water demand from GWD which may, in part, be met by groundwater sourced from the Goleta Basin. However, GWD is subject to the adjudication requirements of the Wright Judgement and is only permitted to extract water in accordance with the allocations determined by the Wright Judgement. Accordingly, although cumulative development served by GWD would increase water demand, GWD is not permitted to increase groundwater extraction such that GWD would exceed their allocation of up to 2,000 AFY. Cumulative projects served by GWD would be subject to GWD's adjudication requirements of the Wright Judgement, and therefore would not receive a water allocation if project's water demand would cause GWD to exceed their allocation of 2,000 AFY from the Goleta Basin in order to serve the cumulative project. As a result, cumulative impacts related to sustainable groundwater management would be less than significant. The proposed project would obtain water from GWD which, based on the *Preliminary Water Service Determination* (Appendix L), has determined the project site has adequate historic water credit for its forecasted demand associated with the proposed project. Therefore, the proposed project's contribution to cumulative groundwater impacts would not be cumulatively considerable.

Flooding

The cumulative study area for flooding and inundation is the San Jose Creek floodplain. Cumulative development within the San Jose Creek floodplain can result in increased flooding, including redirection of flood flows, increases in flood boundaries, and increases in flood elevations. Cumulative projects within the San Jose Creek floodplain, such as the Willow Industrial Park described in Table 3-1 of Section 3, *Environmental Setting*, would encroach on the same floodplain as the proposed project. Each cumulative project that encroaches in a floodplain would be reviewed by the City and FEMA to verify compliance with all applicable regulations governing development within floodplain. Review of floodplain encroachments by the City and FEMA would prevent substantial changes to the floodplain as a result of cumulative development in the region. As a result, cumulative impacts related to flooding would be less than significant. The proposed project would be elevated above the 100-year floodplain and would not place fill or other structures within a 100-year floodplain subject to inundation. Furthermore, as described in Impact HYD-3, the proposed detention basin has been sized to reduce the post-project peak runoff to less than the pre-project peak runoff for a 2-year to 100-year flood event (Appendix H). Therefore, the proposed project's stormwater control features would

reduce flood flows to San Jose Creek. In addition, the fill required for the proposed project would not substantially alter off-site flooding or drainage because flood water from the project site does not discharge to surrounding parcels due to the presence of the earthen berm. The proposed project would not change the flood carrying capacity of the project site, permanently alter a watercourse, or raise the flood elevations (Appendix M). Accordingly, the proposed project would not contribute to cumulative flooding impacts.

4.10 Land Use and Planning

This section analyzes the project's land use compatibility with existing land uses and consistency with applicable City land use policies. Additional discussion on the project's consistency with applicable plans is provided in the following sections: Section 4.1, *Aesthetics*; Section 4.3, *Biological Resources*; Section 4.7*, Greenhouse Gas Emissions;* and Section 4.13*, Transportation and Circulation.* The purpose of this discussion is to identify whether the project would result in an environmental impact due to a conflict with land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Pursuant to the California Environmental Quality Act (CEQA), and for purposes of this analysis, an action, program, or project is consistent with the City's General Plan/Coastal Land Use Plan (General Plan) if, considering all of its aspects, it will further the goals, objectives and policies of the overall General Plan.

4.10.1 Environmental Setting

a. Regional Land Use

Goleta encompasses approximately eight square miles and is located in the South Coast of Santa Barbara County. A portion of the city, including its two-mile Pacific shoreline, is within the California Coastal Zone. The Santa Barbara Airport, which is within the corporate boundaries of the City of Santa Barbara, lies near the geographical center of Goleta. The land use pattern in Goleta is primarily a result of a transition over many decades from rural and agricultural land uses to a suburban community (City of Goleta 2006a). The predominant land use in Goleta is residential, though the city also includes a variety of commercial, industrial, and institutional land uses as well as agricultural land.

b. Project Site and Surrounding Land Uses

The project site is partially developed with a drive-in theater and concessions building, and previously hosted a public market every Sunday. However, operations of both the drive-in theater and public market ended in September 2022. The project site contains a paved access road that connects the site to South Kellogg Avenue, and the remainder of the project site is primarily flat and contains degraded asphalt. Vegetation occurs along the perimeter of the project site.

The project site has a General Plan/Coastal Land Use Plan designation of Service/Industrial. As discussed in Section 2, *Project Description*, the project is subject to the requirements of the previous zoning code (Article II, Coastal Zoning Ordinance) rather than the City's current zoning code, due to the Development Agreement between the project applicant and the City of Goleta. Prior to the adoption of the current zoning code, the project site contained two zoning designations, with the southern two-thirds of the site zoned as Light Industry (M-1), and the northern third of the site zoned as Service Industrial-Goleta (M-S-GOL).[1] Specifically, the southern approximately two-thirds of the site is zoned M-1 and the northern third of the site is zoned M-S-GOL.

The project site is located within the Coastal Zone. The project site is bordered by San Jose Creek and State Route (SR) 217 to the southeast. Residential properties (a mobile home park) are located beyond SR 217 to the east. Industrial development is located to the north and west of the project site. Single-family residences are also to the west of the project site. These residences are mixed in with industrial and commercial uses (e.g., tow yards, auto repair, and recycling businesses). Undeveloped land with

[1] While the current zoning on the site is Service Industrial, the project is subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code).

existing vegetation consisting of trees and shrubs is located approximately 260 feet northwest of the project site and 30 feet southwest of the project site. Tidal wetland and stormwater infrastructure is located to the south of the project site.

4.10.2 Regulatory Setting

a. State Regulations

California Coastal Act

The California Coastal Act, enacted in 1976, establishes procedures for the review of proposed developments in the Coastal Zone and policies for the protection of coastal resources and public access to the coastline.

Public Resources Code § 25500 & 25527

These code sections prohibit the siting of development in certain areas of critical concern for biological resources, such as ecological preserves, wildlife refuges, estuaries, and unique or irreplaceable wildlife habitats of scientific or educational value. If there is no alternative, strict criteria are applied under the authority of the CDFW.

Work within the mean high tide (4.51 feet) is within a Marine Protected Area (MPA), specifically the Goleta Slough State Marine Conservation Area (SMCA). An MPA classification generally prohibits the take of living, geologic, and cultural marine resources, but allows potentially affected and ongoing permitted activities such as dredging and maintenance to continue. An SMCA is a type of MPA that protects resources by prohibiting commercial and recreational take while allowing take incidental to the permitted operation and maintenance of artificial structures inside the SMCA.

b. Local Regulations

Goleta General Plan/Coastal Land Use Plan

The City of Goleta's General Plan is a comprehensive statement of goals, objectives, and policies relating to the development of the community, the management of potential hazards, and the protection of natural and cultural resources within its boundaries to minimize environmental impacts. The General Plan is the primary means for guiding future change in Goleta and provides a guide for decision-making. The General Plan was adopted in 2006 and amended and republished in 2009. It includes the following elements: Land Use, Open Space, Conservation, Safety, Visual and Historic Resources, Transportation, Public Facilities, and Noise. Additionally, the General Plan includes a Housing Element, first adopted in 2015 and republished in 2023. Relevant policies from the General Plan are listed in 4.10-2.

Given its proximity to the Santa Barbara Airport, the project site has a General Plan land use designation of Service/Industrial. This designation is applied to areas within the airport flight path where airport operations limit the range and density of activities that may be allowed. Densities shall not exceed 25 persons per acre to conform to the Airport Land Use Plan and airport operations, as well as to maintain acceptable levels of service on roadways serving these areas. Allowable land uses include warehouses, storage, outdoor storage (including storage of vehicles and recreational vehicles), automotive sales and rentals, manufacturing, heavy commercial uses, and similar uses that may be compatible with airport operations. Near the airport, heights of structures and landscaping

shall be limited so as not to interfere with the airspace in the airport approach zone and clear zone (City of Goleta 2006b).

Goleta Coastal Zoning Ordinance

The project is subject to the requirements of the City's previous zoning code (Article II, Coastal Zoning Ordinance), rather than the current zoning code, because the project application was deemed complete prior to the effective date of the new zoning code in April 2020. The northern third of the site is zoned Service Industrial-Goleta (M-S-GOL) and the southern two-thirds of the site is zoned Light Industry (M-1). Therefore, Sections 35-84A and 35-85 of the City's Coastal Zoning Ordinance would apply to the project.

Section 35-84A: M-S-GOL Service Industrial Goleta.

Section 35-84A of the City's previous Coastal Zoning Ordinance provides development standards for M-S-GOL zone, including permitted uses, setback sizes, height limits, performance standards, and parking/landscaping requirements. Table 4.10-1 in Section 4.10.3, *Impact Analysis*, provides an analysis of the proposed project's consistency with development standards of Section 35-84A.

Section 35-85: M-1 Light Industry.

Section 35-85 of the City's previous Coastal Zoning Ordinance provides development standards for the M-1 zone, including permitted uses, setback sizes, height limits, building coverage limits, performance standards, and parking/landscaping requirements. Table 4.10-1 in Section 4.10.3, *Impact Analysis*, provides an analysis of the proposed project's consistency with development standards of Section 35-85.

Santa Barbara County Airport Land Use Plan

Airport Land Use Plans (ALUP) (also referred to as Airport Land Use Compatibility Plans) serve as tools for Airport Land Use Commissions (ALUC) to review land use or development plans within Airport Influence Areas. The basic function of ALUPs is to promote compatibility between airports and the land uses that surround them. With limited exception, California law requires preparation of ALUPs for each public-use and military airport in the state.

In Santa Barbara County, the ALUC function rests with the Santa Barbara County Association of Governments (SBCAG). Because the project application was deemed complete prior to approval of the January 2023 Santa Barbara Airport Land Use Compatibility Plan, the project is subject to the requirements of the previous 1993 Santa Barbara County ALUP (per Section 2.2.2[b] of the 2023 ALUP). The Santa Barbara County ALUP is the fundamental tool used by SBCAG, acting in its capacity as the Santa Barbara County ALUC, in fulfilling its purpose of promoting airport land use compatibility. Specifically, the ALUP provides for the orderly growth of the Santa Barbara Airport and the surrounding area, and safeguards the general welfare of the inhabitants within the vicinity of the Airport and the public in general. Additionally, the Santa Barbara County ALUP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of general plans and to landowners in their design of new development.

As specified in the 1993 Santa Barbara County ALUP, the entire project site is located in Airport Safety Zone II, which includes safety restrictions and height limitations for development within the safety area. Airport Safety Zone II is divided into three safety areas based on the degree of airport hazard. The northern half of the project site is located within Safety Area 1 (Clear Zone) which is the area

beneath the airplane takeoff or landing path and is the most restrictive area because it is subject to the greatest airport hazard. The southern half of the project site is located within Safety Area 3 (General Traffic Pattern Zone), which is the area in which airport traffic patterns occur and has the least restrictive requirements. The ALUP development standard of a maximum intensity of 25 people per acre, as a site-wide average, would apply to the project.

4.10.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Land use impacts were assessed based upon the level of physical impact anticipated for the various issues that can affect compatibility (air quality, noise, human health and safety, aesthetics), as well as consistency with applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. Based on Appendix G of the CEQA Guidelines, the effects of the project on land use would be significant if the project would:

1. Physically divide an established community; or
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environmental effect.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project physically divide an established community?

Impact LU-1 THE PROJECT WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY, AND THERE WOULD BE NO IMPACT.

The project site is primarily surrounded by industrial and open space land uses. The nearest residential development to the project site is located to the east, across State Route 217. The project site is neither directly adjacent to residences nor located in a residential neighborhood in Goleta. The project includes redevelopment of an existing drive-in theater property into an industrial warehouse building. The project does not include any components (such as new roads) that could divide an established community. Redevelopment of the project site would not result in the physical division of an established community, and the project would have no impact.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact LU-2 THE PROJECT WOULD BE CONSISTENT WITH THE CITY'S COASTAL ZONING ORDINANCE, THE SANTA BARBARA COUNTY AIRPORT LAND USE PLAN (ALUP) AND THE GOLETA SLOUGH STATE MARINE CONSERVATION AREA. EVEN WITH IMPLEMENTATION OF MITIGATION, THE PROJECT WOULD BE POTENTIALLY INCONSISTENT WITH 7 OF THE 50 APPLICABLE GENERAL PLAN/COASTAL LAND USE PLAN POLICIES. OVERALL, IMPACTS WOULD BE CLASS I, *SIGNIFICANT AND UNAVOIDABLE*.

The northern third of the site is zoned Service Industrial-Goleta (M-S-GOL) and the southern two-thirds of the site is zoned Light Industry (M-1) on the City's Zoning Map (City of Goleta 2006b) of the Coastal Zoning Ordinance.

Pursuant to the zoning regulations of the M-S-GOL zone (Section 35-84A), the purpose of the M-S-GOL zone is: "1) to provide for uses of a service and/or light industrial nature particularly those related to manufacturing associated with small start-up businesses, the manufacturing of components of local high technology firms and a variety of storage uses, which are less employee intensive than similar uses permitted in related zone districts; and 2) to limit employment levels to approximately 25 employees per acre in order to be consistent with the Airport Land Use Plan and to maintain acceptable levels of service on area roadways. The intent is to ensure that such uses are well designed and landscaped so as to be harmonious with surrounding areas." Permitted uses in this zone include storage warehouses. As the proposed development would consist of an industrial warehouse building, the project would be permitted in the M-S-GOL zone.

Pursuant to the zoning regulations of the M-1 zone (Section 35-85), the purpose of the M-1 zone is: "to provide areas exclusively for light industrial uses. The intent is to encourage sound industrial development by setting forth appropriate areas for these uses and to protect nearby residential, commercial, and industrial uses from hazards, noise, and other disturbances." Permitted uses in this zone include equipment storage yards and other light industrial uses that are not injurious to people residing or working in the nearby area. The project's proposed land use for an industrial warehouse building would be consistent with permitted uses in the M-1 zone.

Table 4.10-1 summarizes the project's consistency with other M-S-GOL and M-1 zone requirements, including setback, height, and landscaping standards, in the City's Coastal Zoning Ordinance.[2] As indicated in Table 4.10-1, the Project would meet the development standards of City's Coastal Zoning Ordinance for the M-S-GOL and M-1 zones.

[2] As allowed by the Development Agreement, the project is subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code).

Table 4.10-1 Project Consistency with Applicable Coastal Zoning Code Standards

M-S-GOL Zoning Requirements[1]	M-1 Zoning Requirements[2]	Project Consistency
Front Setback: Fifty (50) feet from the centerline and twenty (20) feet from the right-of-way line of any public street.	**Front Setback:** Fifty (50) feet from the centerline and twenty (20) feet from the right-of-way line of any public street.	**Consistent.** The proposed industrial building's front setback would be more than 50 feet from the centerline and 20 feet from the right-of-way of South Kellogg Avenue.
Side Setback: Ten (10) feet.	**Side Setback:** Ten (10) feet.	**Consistent.** The proposed industrial building's side setback would be more than 10 feet from property lines.
Rear Structure Setback: Ten (10) feet.	**Rear Structure Setback:** Ten (10) feet.	**Consistent.** The proposed industrial building's side setback would be more than 10 feet from property lines.
No Coverage Requirement.	**Coverage:** Not more than fifty (50) percent of the net area of the property shall be occupied by buildings and structures.	**Consistent.** The proposed industrial building, parking lot, landscaping, and sidewalks would occupy approximately 5.73 acres of the total 11.77-acre project site (approximately 48.6 percent).
Height limit: 35 feet from finished grade	**Height limit:** 45 feet	**Consistent.** The proposed industrial building would be approximately 39 to 41 feet in height above existing grade; however, the actual building would be 35 feet from finished grade, elevated upon approximately 4 to 6 feet of fill based on Article II standards. Therefore, the actual industrial building would not exceed 35 feet from finished grade.
Landscaping 1. Not less than ten (10) percent of the net lot area shall be landscaped. 2. Outdoor storage areas shall be screened from view of any street by a wall or fence six (6) feet in height. Such a wall or fence shall be located not closer than ten (10) feet to the street right-of-way line. The space between the wall or fence and the right of way line shall be landscaped.	**Landscaping** 1. Not less than ten (10) percent of the net lot area shall be landscaped. 2. Outdoor storage areas shall be screened from view of any street by a wall or fence six (6) feet in height. Such a wall or fence shall be located not closer than five (5) feet to the street right-of-way line. The space between the wall or fence and the street shall be landscaped.	**Consistent.** The project would include 60,939 square feet of landscaping, or 25 percent of the project site. The project would landscape areas along outdoor trash areas such that they are screened from view from South Kellogg Avenue.

[1] Section 35-84A of the City's Coastal Zoning Ordinance.

[2] Section 35-85 of the City's Coastal Zoning Ordinance.

Note: As allowed by the Development Agreement, the project is subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code).

As allowed by the Development Agreement, the project is subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code) rather than the City's current zoning code. While the current zoning code includes buffer size requirements for Streamside Protection Areas (SPA) in Section 17.30.070, the previous zoning code only includes buffer sizes for streams (50 feet) for projects located in the Environmentally Sensitive Habitat Area Overlay District, as identified by the County of Santa Barbara. Section 35-97.2 of the previous zoning code states that if the project site is determined to be outside of this district, then the regulations of the overlay district shall not apply. According to the Santa Barbara County Land Use and Zoning Map (2024), a small portion of San Jose Creek to the southeast of the project site is located within the Environmentally Sensitive Habitat Area Overlay District. Project activities within 50 feet of this area include construction of the subsurface joint utility trench. Section 35-97.19 of the previous zoning code states that no structures shall be allowed within stream corridors when located in the Environmentally Sensitive Habitat Area Overlay District. Because the utility trench would be subsurface and not considered structural development, the project would be consistent with the previous zoning code.

The project's consistency with applicable goals and policies from land use plans, including the Goleta General Plan is discussed in Table 4.10-2. As discussed in Table 4.10-2, the project would be consistent with 43 of the 50 applicable Goleta General Plan land use policies. Potential policy inconsistency would arise due to visual impacts from the proposed building's height and construction within the Streamside Protection Area (SPA) buffer for San Jose Creek.

The proposed detention basin outfall located in the southern portion of the project site, near San Jose Creek, is within the boundary of the Goleta Slough SMCA. The Goleta Slough SMCA was established on January 1, 2012, through the Southern California MPA planning process. The Goleta Slough SMCA is a type of MPA that protects resources by prohibiting commercial and recreational take, while allowing impacts incidental to the permitted operation and maintenance of artificial structures within the Goleta Slough SMCA. The project would operate heavy machinery required for construction, and such machinery may be located within or adjacent to the Goleta Slough SMCA, considering the proposed detention basin outfall is within the Goleta Slough SMCA. A map of the Goleta Slough SMCA's boundary in relation to the proposed detention basin outfall is provided as Figure 4.3-4 in Section 4.3, *Biological Resources*. Authorization for any activities in the Goleta Slough SMCA would be provided by CDFW as part of the Lake and Streambed Alteration Agreement notification process. Therefore, the project would not conflict with land use policies within the Goleta Slough SMCA and larger regional MPA network.

As the entire project site is located within the Airport Influence Area (ALUC 1993) of the Santa Barbara Airport, the 1993 Santa Barbara County ALUP standards would apply to the proposed development[3]. According to the 1993 Santa Barbara County ALUP, the entire project site is located Airport Safety Zone II. The northern portion of the project site is located within Safety Area 1 (Clear Zone) and the southern half of the project site is located within Safety Area 3 (General Traffic Pattern Zone). The more restrictive development standards of Safety Area 1 apply to the project. Therefore, the ALUP development standard of a maximum intensity of 25 people per acre, as a site-wide average, would apply to the project. The proposed industrial building would employ approximately 75 people daily, and would occupy approximately 1.62 acres of the total 11.77-acre project site, which represent an intensity of 6.37 people per acre. Therefore, development under the proposed project would comply with the standard specified in the 1993 Santa Barbara County ALUP. The project site is located in the 60-65 dB CNEL noise contour for the Santa Barbara Airport; however, industrial land uses are

[3] Since the project application was deemed complete prior to adoption of the January 2023 Santa Barbara Airport Land Use Compatibility Plan, the project is subject to the requirements of the 1993 Santa Barbara County ALUP.

identified as compatible within this contour in the 1993 Santa Barbara County ALUP (ALUC 1993). Therefore, the project would not conflict with the 1993 Santa Barbara County ALUP.

For these reasons, the project would comply with development standards of the Santa Barbara County ALUP and would be consistent with the Goleta Slough SMCA. Furthermore, the project would be consistent with development standards of the City's Coastal Zoning Ordinance. However, the project would not comply with 7 applicable policies from the Goleta General Plan. Due to inconsistency with General Plan policies, this impact would be significant and unavoidable.

Mitigation Measures

Mitigation Measures BIO-1 through BIO-4 in Section 4.3, *Biological Resources*, and Mitigation Measure NOI-1 in Section 4.11, *Noise*, would reduce impacts involving conflicts with land use plans, policies, or regulations that were adopted for purposes of reducing environmental impacts to the extent feasible. Mitigation Measures BIO-1 through BIO-4 would reduce potential impacts to special-status species, and Mitigation Measure NOI-1 would reduce project construction noise. These mitigation measures would reduce impacts involving conflict with the Goleta General Plan as they would minimize potential impacts to protected environmental resources within the Goleta General Plan. No additional mitigation measures are available.

Significance After Mitigation

Implementation of mitigation measures identified in Sections 4.3 and 4.11 would reduce impacts to the extent feasible; however, the proposed project would continue to result in significant and unavoidable impacts involving conflict with the Goleta General Plan. The City acknowledges the importance and breadth of the potential General Plan inconsistencies associated with the project by finding them to be significant and unavoidable impacts.

Table 4.10-2 Project Consistency with Applicable Land Use Policies

Policy	Consistency Discussion
Goleta General Plan	
Land Use Element (LU)	
Policy LU 1.4: Employment Centers. Existing developed office and industrial areas shall be preserved and protected to continue their role of providing employment opportunities for the community. A mix of industries and economic activities is encouraged in order to provide a wide range of employment opportunities and wage levels and to avoid over reliance on any one economic sector.	**Consistent**. The project site is located in an existing industrial area and would provide employment opportunities for the community.
Policy LU 1.8: New Development and Neighborhood Compatibility. Approval of all new development shall require compatibility with the character of existing development in the immediate area, including size, bulk, scale, and height. New development shall not substantially impair or block important viewsheds and scenic vistas, as set forth in the Visual and Historical Resources Element.	**Potentially Inconsistent**. The project would consist of an industrial building that is taller than adjacent industrial structures and would impair views of the Santa Ynez Mountains and foothills experienced from the SR 217 local scenic corridor.
Policy LU 1.13 Adequate Infrastructure and Services. For health, safety, and general welfare reasons, approvals of new development shall be subject to a finding that adequate infrastructure and services will be available to serve the proposed development in accordance with the Public Facilities and Transportation Elements.	**Consistent**. The project would include the construction of on-site utility infrastructure that would serve the proposed development. The project site is not located in an area where infrastructure and services would not be able to serve the proposed development.
Policy LU 4.4: Service Industrial (I-S). This designation is applied to properties within the airport flight path where airport operations limit the range and density of activities that may be allowed. Densities shall not exceed 25 persons per acre to conform to the Airport Land Use Plan and airport operations, as well as to maintain acceptable levels of service on roadways serving these areas. Uses may occur in a less-managed environment than in the Business Park category. Allowed uses include warehouses, storage, outdoor storage (including storage of vehicles and recreational vehicles), automotive sales and rentals, manufacturing, heavy commercial uses, and similar uses that may be compatible with airport operations. The processing or storage of flammable or hazardous materials shall be strictly controlled. Near the airport, heights of structures and landscaping shall be limited so as not to interfere with the airspace in the airport approach zone and clear zone.	**Consistent**. The project site has a Goleta General Plan land use designation of Service Industrial. The project would comply with the standards of this land use designation, and would not conflict with the 25 persons per acre density limit. As discussed in the *Updated Traffic and Circulation Study* (Appendix B), the Hollister Avenue/Kellogg Avenue intersection is forecast to operate at LOS D under cumulative plus project conditions during the PM peak hour. However, following the implementation of the project-specific Deficiency Plan and improvements to that intersection through fees under the Goleta Transportation Improvement Program, this intersection would operate at LOS C. As an industrial warehouse building with office space, the project would be consistent with allowable uses for the Service Industrial land use designation. All hazardous materials used during project construction or operation would be transported, handled, and disposed of in compliance with existing federal, State, and local regulations. Furthermore, project height and landscaping would not conflict with limits for the airport clear zone within the Service Industrial land use designation.
Open Space Element (OS)	
Policy OS 8.5: Mitigation. If research and surface reconnaissance shows that the project area contains a resource of cultural significance that would be adversely impacted by proposed development and avoidance is infeasible, mitigation measures sensitive to the cultural beliefs of the affected population shall be required. Reasonable efforts to leave these resources in an undisturbed state through capping or covering resources with a soil layer prior to development shall be required. If data recovery through excavation is the only feasible mitigation, the City shall confer with the affected Native American nation or most-likely descendants, as well as agencies charged with the responsibility of preserving these resources and organizations having a professional or cultural interest, prior to the removal and disposition of any artifacts.	**Consistent**. The project site is located in an archaeologically sensitive area, as is most of the City of Goleta (See Section 4.4, *Cultural and Tribal Cultural Resources*). A cultural resources records search indicated no archaeological resources have been recorded within the project site, and there is minimal potential for undiscovered archaeological resources to exist within the project site. Since the project site does not contain a resource of cultural significance that would be adversely impacted by proposed development, mitigation is not required. However, as a condition of approval, an archaeological monitor will be required at the request of local Tribal group.
Conservation Element (CE)	
Policy CE 1.6: Protection of ESHAs. ESHAs shall be protected against significant disruption of habitat values, and only uses or development dependent on and compatible with maintaining such resources shall be allowed within ESHAs or their buffers. The following shall apply: a. No development, except as otherwise allowed by this element, shall be allowed within ESHAs and/or ESHA buffers. b. A setback or buffer separating all permitted development from an adjacent ESHA shall be required and shall have a minimum width as set forth in subsequent policies of this element. The purpose of such setbacks shall be to prevent any degradation of the ecological functions provided by the habitat area. c. Public accessways and trails are considered resource-dependent uses and may be located within or adjacent to ESHAs. These uses shall be sited to avoid or minimize impacts on the resource to the maximum extent feasible. Measures— such as signage, placement of boardwalks, and limited fencing or other barriers—shall be implemented as necessary to protect ESHAs. d. The following uses and development may be allowed in ESHAs or ESHA buffers only where there are no feasible, less environmentally damaging alternatives and will be subject to requirements for mitigation measures to avoid or lessen impacts to the maximum extent feasible: 1) public road crossings, 2) utility lines, 3) resource restoration and enhancement projects, 4) nature education, 5) biological research, and 6) Public Works projects as identified in the Capital Improvement Plan, only where there are no feasible, less environmentally damaging alternatives. e. If the provisions herein would result in any legal parcel created prior to the date of this plan being made unusable in its entirety for any purpose allowed by the land use plan, exceptions to the foregoing may be made to allow a reasonable economic use of the parcel. Alternatively, the City may establish a program to allow transfer of development rights for such parcels to receiving parcels that have areas suitable for and are designated on the Land Use Plan map for the appropriate type of use and development.	**Potentially Inconsistent.** Development proposed in the 1.68-acre San Jose Creek 100-foot SPA buffer, which is considered ESHA, includes the detention basin and drainage outfall, utilities, access, landscaping, parking, retaining walls, the placement of fill, and a construction noise barrier required under Mitigation Measure NOI-1. As summarized under Table 4.3-6 within Impact BIO-8 in Section 4.3, *Biological Resources*, the construction of utilities, maintenance of existing drainage improvements, access maintenance, and fencing (walls) are allowed uses in the SPA. However, the project would place fill within the SPA buffer. Additionally, alternative site configurations for the project that reduce development within the SPA are feasible (as discussed in Section 6, *Alternatives*). Therefore, as a feasible, less environmentally damaging alternative exists, the project would be inconsistent with this policy.

Policy	Consistency Discussion
Policy CE 2.1: Designation of Protected Creeks. The provisions of this policy shall apply to creeks shown in Figure 4-1. These watercourses and their associated riparian areas are defined as ESHAs. They serve as habitat for fish and wildlife, provide wildlife movement corridors, provide for the flow of stormwater runoff and floodwaters, and furnish open space and passive recreational areas for city residents.	**Consistent.** The analysis in Section 4.3, *Biological Resources*, considers San Jose Creek and Old San Jose Creek and the associated riparian areas as ESHA, and analyzes project impacts to those ESHA areas.
Policy CE 2.2: Streamside Protection Areas. A streamside protection area (SPA) is hereby established along both sides of the creeks identified in Figure 4-1. The purpose of the designation shall be to preserve the SPA in a natural state in order to protect the associated riparian habitats and ecosystems. The SPA shall include the creek channel, wetlands and/or riparian vegetation related to the creek hydrology, and an adjacent upland buffer area. The width of the SPA upland buffer shall be as follows: a. The SPA upland buffer shall be 100 feet outward on both sides of the creek, measured from the top of the bank or the outer limit of wetlands and/or riparian vegetation, whichever is greater. The City may consider increasing or decreasing the width of the SPA upland buffer on a case-by-case basis at the time of environmental review. The City may allow portions of a SPA upland buffer to be less than 100 feet wide, but not less than 25 feet wide, based on a site specific assessment if (1) there is no feasible alternative siting for development that will avoid the SPA upland buffer; and (2) the project's impacts will not have significant adverse effects on streamside vegetation or the biotic quality of the stream. b. If the provisions above would result in any legal parcel created prior to the date of this plan being made unusable in its entirety for any purpose allowed by the land use plan, exceptions to the foregoing may be made to allow a reasonable economic use of the parcel, subject to approval of a conditional use permit	**Potentially Inconsistent**. This policy requires a 100-foot setback from the San Jose Creek SPA; however, the City can approve a reduction in the setback to no less than 25 feet. The project includes a request to reduce the 100-foot setback at San Jose Creek to 25 feet along the entire project site boundary adjacent to San Jose Creek. The project would maintain a minimum 25-foot buffer from San Jose Creek, with the exception of the drainage outfall to be removed and relocated within the banks. Upland elements proposed in the SPA between 25 to 100 feet include the new detention basin, utilities (e.g., lines, meters, trenching), access repaving in the same footprint as the existing access road, new landscaping, parking spaces, entrance fencing, lighting, the placement of fill to meet flood standards, and temporary construction noise barriers. As discussed in Policy 2.3 below, all of the features proposed within the SPA are allowable uses. However, alternative site configurations for the project that reduce development within the SPA are feasible (as discussed in Section 6, *Alternatives*). As analyzed in Impact BIO-8 in Section 4.3, *Biological Resources*, given the lack of creek channel streamside vegetation and project site buffer vegetation, impacts to streamside vegetation would be less than significant. However, construction and operational impacts on the biotic quality of the SPA from a buffer reduction to 25 feet would be significant and unavoidable. Additionally, development in the SPA buffer would eliminate the potential for future preservation in a natural state envisioned under Policy CE 2.2. For these reasons, the project is inconsistent with Policy CE 2.2
Policy CE 2.3: Allowable Uses and Activities in Streamside Protection Areas. The following compatible land uses and activities may be allowed in SPAs, subject to all other policies of this plan, including those requiring avoidance or mitigation of impacts: a. Agricultural operations, provided they are compatible with preservation of riparian resources. b. Fencing and other access barriers along property boundaries and along SPA boundaries. c. Maintenance of existing roads, driveways, utilities, structures, and drainage improvements. d. Construction of public road crossings and utilities, provided that there is no feasible, less environmentally damaging alternative. e. Construction and maintenance of foot trails, bicycle paths, and similar low-impact facilities for public access. f. Resource restoration or enhancement projects. g. Nature education and research activities. h. Low-impact interpretive and public access signage. i. Other such Public Works projects as identified in the Capital Improvement Plan, only where there are no feasible, less environmentally damaging alternatives.	**Consistent.** Development proposed in the 1.68-acre San Jose Creek 100-foot SPA buffer includes the detention basin and drainage outfall, utilities, access, landscaping, parking, retaining walls, the placement of fill, and a construction noise barrier required under Mitigation Measure NOI-1. As summarized under Table 4.3-6 within Impact BIO-8 in Section 4.3, *Biological Resources*, the construction of utilities, maintenance of existing drainage improvements, access maintenance, and fencing (walls) are allowed uses in the SPA.
Policy CE 2.5 Maintenance of Creeks as Natural Drainage Systems. Creek banks, creek channels, and associated riparian areas shall be maintained or restored to their natural condition wherever such conditions or opportunities exist. Creeks carry a significant amount of Goleta's stormwater flows. The following standards shall apply: a. The capacity of natural drainage courses shall not be diminished by development or other activities. b. Drainage controls and improvements shall be accomplished with the minimum vegetation removal and disruption of the creek and riparian ecosystem that is necessary to accomplish the drainage objective. c. Measures to stabilize creek banks, improve flow capacity, and reduce flooding are allowed but shall not include installation of new concrete channels, culverts, or pipes except at street crossings, unless it is demonstrated that there is no feasible alternative for improving capacity. d. Drainage controls in new development shall be required to minimize erosion, sedimentation, and flood impacts to creeks. Onsite treatment of stormwater through retention basins, infiltration, vegetated swales, and other best management practices (BMPs) shall be required in order to protect water quality and the biological functions of creek ecosystems. e. Alteration of creeks for the purpose of road or driveway crossings shall be prohibited except where the alteration is not substantial and there is no other feasible alternative to provide access to new development on an existing legal parcel. Creek crossings shall be accomplished by bridging and shall be designed to allow the passage of fish and wildlife. Bridge abutments or piers shall be located outside creek beds and banks, unless an environmentally superior alternative exists.	**Consistent.** The project would not diminish the natural drainage course of the project site, would not alter San Jose Creek, and would not include drainage controls or improvements that are prohibited in this policy.
Policy CE 2.6 Restoration of Degraded Creeks. Segments of several creeks in Goleta have been covered or channelized by concrete culverts, causing degradation of the creek ecosystem. Restoration activities for improving degraded creek resources shall include the following: a. Channelized creek segments and culverts shall be evaluated and removed to restore natural channel bed and bank, where feasible. b. Creek courses in public rights-of-way shall be uncovered as part of public works improvement projects. c. Barriers that prevent migration of fish such as anadromous salmonids from reaching their critical habitat shall be removed or modified. d. Restoration of native riparian vegetation and removal of exotic plant species shall be implemented, unless such plants provide critical habitat for monarch butterflies, raptors, or other protected animals. e. Creek rehabilitation projects shall be designed to maintain or improve flow capacity, trap sediments and other pollutants that decrease water quality, minimize channel erosion, prevent new sources of pollutants from entering the creek, and enhance in-creek and riparian habitat. f. The use of closed-pipe drainage systems for fish-bearing creeks shall be prohibited unless there is no feasible, less environmentally damaging alternative. When the use of culverts is necessary, the culverts shall be oversized and have gravel bottoms that maintain the channel's width and grade.	**Potentially Inconsistent.** The project would remove the on-site agricultural box and tote, which is currently within the SPA for San Jose Creek. The project would request a setback reduction of 25 feet. However, as discussed in Impact BIO-8 in Section 4.3, *Biological Resources*, the proposed new development and land uses in the SPA buffer would eliminate the potential for preservation and restoration of San Jose Creek. Without the proposed new development, the SPA for San Jose Creek could be enhanced as directed under this policy. Therefore, the project would be inconsistent with this policy.

Policy	Consistency Discussion
Policy CE 3.3 Site-Specific Wetland Delineations. In considering development proposals where an initial site inventory or reconnaissance indicates the presence or potential for wetland species or indicators, the City shall require the submittal of a detailed biological study of the site, with the addition of a delineation of all wetland areas on the project site. Wetland delineations shall be based on the definitions contained in Section 13577(b) of Title 14 of the California Code of Regulations. A preponderance of hydric soils or a preponderance of wetland indicator species will be considered presumptive evidence of wetland conditions. At a minimum, the delineation report shall contain: a. A map at a scale of 1":200' or larger showing topographic contours. b. An aerial photo base map. c. A map at a scale of 1":200' or larger with polygons delineating all wetland areas, polygons delineating all areas of vegetation with a preponderance of wetland indicator species, and the locations of sampling points. d. A description of the survey methods and surface indicators used for delineating the wetland polygons. e. A statement of the qualifications of the person preparing the wetland delineation.	**Consistent.** A detailed biological study of the project site, including a wetland delineation, was completed as part of this project. Biological studies are included as Appendices D-1 and D-2, and the wetland delineation is included as Appendix D-3.
Policy CE 8.2 Protection of Habitat Areas. All development shall be located, designed, constructed, and managed to avoid disturbance of adverse impacts to special-status species and their habitats, including spawning, nesting, rearing, roosting, foraging, and other elements of the required habitats.	**Consistent.** The project would be located, designed, and constructed to avoid disturbance of special-status species and their habitats. Project construction would be managed to avoid special-status species and their habitats. As discussed under Impacts BIO-1 through BIO-4 in Section 4.3, *Biological Resources*, implementation of Mitigation Measures BIO-1 through BIO-4 would ensure that impacts to special-status species and their habitat areas are less than significant.
Policy CE 12.2 Control of Air Emissions from New Development: The following shall apply to reduction of air emissions from new development: a. Any development proposal that has the potential to increase emissions of air pollutants shall be referred to the Santa Barbara County Air Pollution Control District for comments and recommended conditions prior to final action by the City. b. All new commercial and industrial sources shall be required to use the best available air pollution control technology. Emissions control equipment shall be properly maintained to ensure efficient and effective operation. c. Adequate buffers between new sources and sensitive receptors shall be required. d. Any permit required by the Santa Barbara County Air Pollution Control District shall be obtained prior to issuance of final development clearance by the City.	**Consistent.** As part of the CEQA process, the Notice of Preparation for the project has been submitted to state and local agencies, including the Santa Barbara Air Pollution Control District (SBAPCD), to comment and provide recommendations. The project will use the best available air pollution control technology and ensure equipment is properly maintained. The project is not directly adjacent to sensitive receptors and would not require a buffer. Additionally, the project would not require a permit from the SBAPCD.
Policy CE 12.3 Control of Emissions during Grading and Construction: Construction site emissions shall be controlled by using the following measures: a. Watering active construction areas to reduce windborne emissions. b. Covering trucks hauling soil, sand, and other loose materials. c. Paving or applying nontoxic solid stabilizers on unpaved access roads and temporary parking areas. d. Hydroseeding inactive construction areas. e. Enclosing or covering open material stockpiles. f. Revegetating graded areas immediately upon completion of work.	**Consistent.** The project would control construction site emissions through watering construction areas and covering trucks hauling soil. After clearing, grading, earth moving or excavation is completed, the disturbed area will be treated by watering, or using roll-compaction, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All driveways and sidewalks to be paved/surfaced will be completed as soon as possible.
Policy CE 13.2 Energy Efficiency in Existing and New Commercial and Industrial Development. The following measures shall be employed to reduce energy consumption in existing and new commercial and industrial buildings: a. Reduction of energy consumption in existing buildings through improved design and management of heating, ventilation, air conditioning systems, and lighting is encouraged. Master metering is discouraged, and conversions to metering for individual tenant spaces shall be promoted where feasible. b. The City shall enforce the state's residential energy conservation building standards set forth in Title 24 through its plan check and building permit issuance processes. c. The City shall encourage nonresidential buildings to be designed in a manner that is appropriate for local climate conditions, taking into account natural light and ventilation, placement of landscaping, and use of integrated energy systems. This encompasses concepts such as cogeneration, waste heat systems, and other similar technologies.	**Consistent.** As discussed in Section 4.5, *Energy*, the project would use 100 percent renewable electricity and would be energy efficient through compliance with the latest Title 24 requirements. As a non-residential structure, the proposed industrial building would use 100 percent renewable electricity, LED lighting, indoor water use efficiency measures, and provided both electric vehicle and bicycle parking, all of which would reduce overall energy consumption and promote energy efficiency.
Policy CE-15.3: Water Conservation for New Development. In order to minimize water use, all new development shall use low water use plumbing fixtures, water-conserving landscaping, low flow irrigation, and reclaimed water for exterior landscaping, where appropriate.	**Consistent.** The proposed project would include water efficient appliances to reduce water consumption for landscaping, plumbing, and irrigation consistent with the latest Title 24 Green Building Code and Building Energy Efficiency Standards.

Policy	Consistency Discussion
Safety Element (SE)	
Policy SE 1: Safety in General: To avoid siting of development or land use activities in hazardous areas, and where this is infeasible, require appropriate mitigation to lessen or minimize exposure to hazards.	**Consistent.** The project site would not be located on a hazardous material site identified in the State Water Resources Control Board GeoTracker database or the Department of Toxic Substances Control EnviroStor database.
Policy SE 1.3: Site-Specific Hazards Studies. Applications for new development shall consider exposure of the new development to coastal and other hazards. Where appropriate, an application for new development shall include a geologic/soils/geotechnical study and any other studies that identify geologic hazards affecting the proposed project site and any necessary mitigation measures. The study report shall contain a statement certifying that the project site is suitable for the proposed development and that the development will be safe from geologic hazards. The report shall be prepared and signed by a licensed certified engineering geologist or geotechnical engineer and shall be subject to review and acceptance by the City.	**Consistent**. As stated in Section 4.6, *Geology and Soils*, technical documents that informed project design and environmental analysis include the *Revised Geotechnical Engineering Report Update* prepared by Earth Systems Pacific in 2022 (Appendix G) and the *Preliminary Drainage Design for Goleta Business Park* prepared by Stantec in 2022 (Appendix H). These studies evaluated geologic hazards that may affect the project site, determined that the site was suitable for the proposed development, and provided recommendations to mitigate potential geologic impacts. As discussed in Section 4.9, *Hydrology and Water Quality*, a Sea Level Rise Analysis was prepared for the project to analyze the potential for site inundation due to future inundation resulting from climate change.
Policy SE 1.6: Enforcement of Building Codes. The City shall ensure through effective enforcement measures that all new construction in the city is built according to the adopted building and fire codes.	**Consistent**. The proposed project involves construction of a new building that would comply with the City's adopted building and fire codes.
Policy SE 4.3: Geotechnical and Geologic Studies Required. Where appropriate, the City shall require applications for planning entitlements for new or expanded development to address potential geologic and seismic hazards through the preparation of geotechnical and geologic reports for City review and acceptance.	**Consistent.** The project included a *Revised Geotechnical Engineering Report Update,* included as Appendix G, that addresses geologic and seismic hazards for the potential new development.
Policy SE 6.1: Map of Flood Hazard Areas. The City shall use the most recent edition of the federal Flood Insurance Rate Maps (FIRM maps) in evaluating applications for new or expanded development on properties subject to flood hazards. All applications for new or expanded development shall be required to show, where applicable, the floodway, 100-year floodplain, and the 500-year floodplain on the site plan showing the proposed development. The map in Figure 5-2 is a facsimile rather than the official flood hazard map and is intended only to be illustrative of possible flood hazard areas.	**Consistent.** The most recent FIRM maps were used to evaluate the project's flood hazard. According to Flood Insurance Rate Map No. 06083C1362G, the project site is within Zone A, corresponding to an area within the 100-year floodplain. Please refer to Section 4.9, *Hydrology and Water Quality*, for a more detailed discussion regarding the project's flood hazard.
Policy SE 6.2: Areas Subject to Local Urban Flooding. In addition to flood hazard areas shown on the FIRM maps, the City may require applications for new or expanded development in areas with known persistent local urban flooding to include measures that lessen the urban flooding hazard and/or that mitigate its effects on the proposed development. This requirement shall apply to flooding on any street or roadway that provides access to the proposed development.	**Consistent.** The project site is designated Zone A by FEMA Flood Insurance Rate Map No. 06083C1362H, while San Jose Creek is a mapped regulatory floodway **(**Appendix M of this EIR). The project would include flood-proofing measures such as the use of between 4 to 6 feet of fill to elevate the proposed building above the 100-year floodplain elevation, installation of a proposed detention basin that would capture stormwater flows on the project site, and proposed vegetated drainage swale for eventual discharge into San Jose Creek.
Policy SE 6.4: Avoidance of Flood Hazard Areas. The City shall discourage any new intensive development in any flood hazard area. Similarly, the City shall require appropriate flood mitigation for intensification of existing development in any flood prone area. The City shall not approve development within areas designated as the 100-year floodplain that would obstruct flood flow (such as construction in the designated floodway), displace floodwaters onto other property, or be subject to flood damage. The City shall not allow development that will create or worsen drainage problems.	**Consistent.** Because the project site is located in a flood hazard area, the proposed industrial building would be located on fill to elevate the first floor above the 100-year floodplain elevation. The project would not obstruct flood flow, displace floodwaters onto other property, or be subject to flood damage. The project would not create or worsen drainage problems.
Policy SE 6.6: Enforcement of a Watercourse Setback Ordinance. A minimum 50-foot setback shall be required from streambanks and flood control channels for all new development (see related CE 2.2). For projects that would be rendered infeasible by the application of such minimum setbacks, the project applicant shall provide a site-specific engineering study with recommended mitigation measures to allow for a reduced setback that would not expose development to unacceptable risk. Furthermore, in these cases, the City shall consult with the Santa Barbara County Flood Control District to determine whether the proposed lesser setback would be appropriate, in that it would allow access for flood control maintenance and enable proper operation of the channels. The City shall maintain and enforce the policies and standards within a Water Course Setback Ordinance.	**Consistent.** The project would request a setback reduction of 25 feet. Although the setback would be reduced, the applicant would grant the City an easement on the project site for maintenance access to San Jose Creek. The proposed easement would allow access for flood control maintenance and enable proper operation of the channel, and would thus be consistent with the intent of this policy.
Policy SE 9: Airport-Related Hazards. To minimize the risk of potential hazards associated with aircraft operations at the Santa Barbara Airport.	**Consistent.** As stated in Section 4.8, *Hazards and Hazardous Materials*, the project would not result in significant hazards associated with aircraft operations at the Santa Barbara Airport. The proposed project would comply with existing City of Goleta, ALUC, and FAA regulations related to airport hazards and safety.
Policy SE 9.1: Clear Zone and Airport Approach Zone Regulations. The City will maintain and enforce through appropriate zoning measures the Clear Zone and Airport Approach Zone regulations pursuant to the plans and policies of the Santa Barbara County ALUC. The City may also require, as a condition of approval of development applications, dedication of avigation easements for areas within the Airport Clear Zones and Airport Approach Zones.	**Consistent.** The northern portion of the project site is located within the Clear Zone of the Santa Barbara Airport. Development under the proposed project would comply with ALUC standards and the project's industrial land use would be compatible with accepted uses in the Clear Zone.
Policy SE 9.2: Height Restrictions. The City shall ensure that the heights of proposed buildings, other structures, and landscaping conform to airport operational requirements to minimize the risk of aircraft accidents. The City shall establish and maintain standards in its zoning ordinance for building and structure height restrictions for development in proximity to the Santa Barbara Municipal Airport. To ensure compliance with height restrictions, proposed development or uses that require ALUC review pursuant to the Airport Land Use Plan shall be referred to the ALUC for review.	**Consistent.** Although the proposed project would increase building height on the project site, and would be built at a height taller than existing development in the area, the project would be consistent with the City's development standards and zoning code that existed prior to 2020, which considered proximity to the Santa Barbara Municipal Airport.

Policy	Consistency Discussion
Policy SE 9.3: Limitations on Development and Uses. The City shall establish and maintain standards in its zoning ordinance for use restrictions for development near the Santa Barbara Municipal Airport. These standards should identify uses that may be compatible in each zone. Proposed development or uses that require ALUC review pursuant to the Airport Land Use Plan shall be referred to the ALUC for review.	**Consistent**. The proposed project would be considered an allowable land use for both the M-1 and M-S-GOL zones, and would not conflict with the operations of the Santa Barbara Airport. As stated in Section 4.8, *Hazards and Hazardous Materials*, development under the proposed project would comply with standards specified by the ALUC. The City engaged with SBCAG, in their capacity as the ALUC, in August 2023. SBCAG determined that the project would not be required to undergo ALUC review as the previous zoning ordinance and General Plan were found consistent with the 1993 Santa Barbara County ALUP and the project does not require any amendments to either.
Policy SE 9.5: Limitations on Density. The City shall establish and maintain standards in its zoning ordinance for density limitations for development near the Santa Barbara Municipal Airport. These standards should comply with the Santa Barbara County Airport Land Use Plan and should specify the density considered compatible in each zone. Proposed developments that require ALUC review pursuant to the Airport Land Use Plan shall be referred to the ALUC for review.	**Consistent**. As discussed in Section 4.8, *Hazards and Hazardous Materials,* the project would comply with density limitations specified by the ALUC. The project would employ approximately 75 people daily, and would comply with density limitations of the M-1 and M-S-GOL zones. The City engaged with SBCAG, in their capacity as the ALUC, in August 2023. SBCAG determined that the project would not be required to undergo ALUC review as the previous zoning ordinance and General Plan were found consistent with the 1993 Santa Barbara County ALUP and the project does not require any amendments to either.
Policy SE 10: Hazardous Materials and Facilities. To minimize injuries, illnesses, loss of life and property, and economic and social disruption due to potential upsets associated with the storage, use, handling, and transport of hazardous materials, and to ensure proper oversight of hazardous waste sites within the city.	**Consistent.** Project construction and operation would involve minimal transport, use, and disposal of hazardous materials. All hazardous materials would be transported, handled, and disposed of in compliance with existing federal, State, and local regulations.
Policy SE 10.2 Compliance with Law. The storage, handling, and disposal of any hazardous material shall be done only in strict compliance with applicable City, state, and federal law.	**Consistent.** As discussed in Section 4.8, *Hazards and Hazardous* Materials, all hazardous materials used during project construction or operation would be transported, handled, and disposed of in compliance with existing federal, State, and local regulations.
Visual and Historic Resources Element (VH)	
Policy VH 1.1: Scenic Resources. An essential aspect of Goleta's character is derived from the various scenic resources within and around the city. Views of these resources from public and private areas contribute to the overall attractiveness of the city and the quality of life enjoyed by its residents, visitors, and workforce. The City shall support the protection and preservation of the following scenic resources: a. The open waters of the Pacific Ocean/Santa Barbara Channel, with the Channel Islands visible in the distance. b. Goleta's Pacific shoreline, including beaches, dunes, lagoons, coastal bluffs, and open costal mesas. c. Goleta and Devereux Sloughs. d. Creeks and the vegetation associated with their riparian corridors. e. Agricultural areas, including orchards, lands in vegetable or other crop production, and fallow agricultural lands. f. Lake Los Carneros and the surrounding woodlands. g. Prominent natural landforms, such as the foothills and the Santa Ynez Mountains.	**Potentially Inconsistent**. As discussed in Section 4.1, *Aesthetics*, the proposed industrial building would block views of the Santa Ynez Mountains and foothills, which are listed as a scenic resource, from viewers traveling northbound of SR 217. Although project design would reduce the severity of this impact through naturally colored building materials and landscaping to add visual screening, the addition of the proposed industrial building would substantially obstruct views of this scenic resource.
Policy VH 1.4: Protection of Mountain and Foothill Views. Views of mountains and foothills from public areas shall be protected. View protection associated with development that may affect views of mountains or foothills should be accomplished first through site selection and then by use of design alternatives that enhance, rather than obstruct or degrade, such views. To minimize structural intrusion into the skyline, the following development practices shall be used where appropriate: a. Limitations on the height and size of structures. b. Limitations on the height of exterior walls (including retaining walls) and fences. c. Stepping of buildings so that the heights of building elements are lower near the street and increase with distance from the public viewing area. Increased setbacks along major roadways to preserve views and create an attractive visual corridor. d. Downcast, fully shielded, full cut off lighting of the minimum intensity needed for the purpose. e. Limitations on removal of native vegetation. f. Use of landscaping for screening purposes and/or minimizing view blockage as applicable. g. Revegetation of disturbed areas. h. Limitations on the use of reflective materials and colors for roofs, walls (including retaining walls), and fences. i. Selection of colors and materials that harmonize with the surrounding landscape. j. Clustering of building sites and structures.	**Consistent**. Although the proposed industrial building would block views of the Santa Ynez Mountains and foothills, the project would implement development practices that minimize structural intrusion into the skyline, including height limitations, shielded lighting, landscaping for screening purposes, limitations on the use of reflective materials and colors, and selection of colors and materials that are muted and blend with the surrounding landscape.
Policy VH 2.2: Preservation of Scenic Corridors. The aesthetic qualities of scenic corridors shall be preserved through retention of the general character of significant natural features; views of the ocean, foothills, and mountainous areas; and open space associated with recreational and agricultural areas including orchards, prominent vegetation, and historic structures. If landscaping is used to add visual interest or for screening, care should be taken to prevent a wall-like appearance. Bridges, culverts, drainage ditches and other roadway ancillary elements should be appropriately designed; side slopes and earthen berms adjacent to roadways should be natural in appearance.	**Potentially Inconsistent**. Please refer to consistency discussion for Policy VH 1.1, Scenic Resources. The proposed industrial building would block views of the Santa Ynez Mountains and foothills, obstructing views of this scenic resource from the SR 217 scenic corridor.

Policy	Consistency Discussion
Policy VH 2.3 Development Projects Along Scenic Corridors. Development adjacent to scenic corridors should not degrade or obstruct views of scenic areas. To ensure visual compatibility with the scenic qualities, the following practices shall be used, where appropriate: a. Incorporate natural features in design. b. Use landscaping for screening purposes and/or for minimizing view blockage as applicable. c. Minimize vegetation removal. d. Limit the height and size of structures. e. Cluster building sites and structures. f. Limit grading for development including structures, access roads, and driveways. Minimize the length of access roads and driveways and follow the natural contour of the land. g. Preserve historical structures or sites. h. Plant and preserve trees. i. Minimize use of signage. j. Provide site-specific visual assessments, including use of story poles. k. Provide a similar level of architectural detail on all elevations visible from scenic corridors. l. Place existing overhead utilities and all new utilities underground. m. Establish setbacks along major roadways to help protect views and create an attractive scenic corridor. On flat sites, step the heights of buildings so that the height of building elements is lower close to the street and increases with distance from the street.	**Potentially Inconsistent**. Please refer to consistency discussion for Policy VH 1.1, Scenic Resources. The proposed industrial building would block views of the Santa Ynez Mountains and foothills, obstructing views of this scenic resource from the SR 217 scenic corridor.
Policy VH 3.4: Building Design. The city's visual character shall be enhanced through development of structures that are appropriate in scale and orientation and that use high quality, durable materials. Structures shall incorporate architectural styles, landscaping, and amenities that are compatible with and complement surrounding development.	**Consistent**. The project would involve construction of an industrial building that would be similar in material and color to surrounding industrial buildings in the area, albeit taller in height. Project landscaping would include native and climate appropriate plants including trees and palms, shrubs, grasses, groundcovers, vines, and espaliers, that would resemble vegetation in the surrounding area.
Policy VH 4.1: Lighting. Outdoor lighting fixtures shall be designed, located, aimed downward or toward structures (if properly shielded), retrofitted if feasible, and maintained in order to prevent over-lighting, energy waste, glare, light trespass, and sky glow. The following standards shall apply: a. Outdoor lighting shall be the minimum number of fixtures and intensity needed for the intended purpose. Fixtures shall be fully shielded and have full cut off lights to minimize visibility from public viewing areas and prevent light pollution into residential areas or other sensitive uses such as wildlife habitats or migration routes. b. Direct upward light emission shall be avoided to protect views of the night sky. c. Light fixtures used in new development shall be appropriate to the architectural style and scale and compatible with the surrounding area.	**Consistent**. As discussed in Section 4.1, *Aesthetics*, all project lighting would use light emitting diode (LED) fixtures and would include semi- and fully cut-off light fixtures, which would minimize light trespass and glare. Project lighting would be designed in accordance with City and Federal Aviation Administration standards, would be compatible with industrial lighting in the vicinity, and would not detract from views of the night sky. Light fixtures used for the proposed building would be appropriate for an industrial building and compatible with the industrial and commercial setting of the surrounding area. Additionally, the project applicant has prepared a photometric plan that demonstrates project lighting would be contained on the project site and would not spill onto adjacent properties.
Policy VH 4.6: Industrial Areas. The following standards shall be applicable to industrial development (see related LU 4.2): a. All structures shall be designed to be compatible with adjacent development relative to size, bulk, and scale. b. Where residential or commercial uses exist adjacent to industrial properties, such areas shall be buffered from industrial uses by increased setbacks and heavily landscaped screens. c. Transfer of noise off-site shall be minimized by the use of screen walls, acoustical enclosures, or building placement. Noise generating activities shall be located as far as possible from nonindustrial uses. d. All outdoor storage or maintenance areas shall be screened. Landscaping may be used alone or in conjunction with fencing or walls. e. Loading areas and recycling and trash facilities shall be easily accessed and screened from view with landscaping and/or fencing or walls. Adjacent uses shall be considered when siting such areas. f. Roof-mounted equipment shall be screened and considered as part of the structure for height calculations. g. Architectural detailing shall be used to break up the box-like appearance of construction typically used for industrial buildings. h. Adequate lighting shall be provided for security and safety purposes but designed to prevent encroachment onto adjacent uses, wildlife habitats, or the night sky. i. Sufficient, secure, and protected bicycle parking shall be provided. j. Public transit shall be encouraged through effective placement of stops for local and regional transit services. Existing stops shall be upgraded as appropriate.	**Consistent**. The project's industrial building would be similar in design to surrounding industrial development, albeit taller than surrounding structures. Additionally, there are no public transit services within 0.5 mile of the project site. However, the proposed industrial building would include a parapet wall along the rooftop that would provide noise screening, would screen outdoor storage areas with landscaping, ensure loading areas and recycling/trash facilities are easily accessed and are screened from view, would use architectural detailing to break building massing, would provide bicycle parking, and would provide adequate lighting.

Policy	Consistency Discussion
Policy VH 4.9: Landscape Design. Landscaping shall be considered and designed as an integral part of development, not relegated to remaining portions of a site following placement of buildings, parking, or vehicular access. Landscaping shall conform to the following standards: a. Landscaping that conforms to the natural topography and protects existing specimen trees is encouraged. b. Any specimen trees removed shall be replaced with a similar size tree or with a tree deemed appropriate by the City. c. Landscaping shall emphasize the use of native and drought-tolerant vegetation and should include a range and density of plantings including trees, shrubs, groundcover, and vines of various heights and species. d. The use of invasive plants shall be prohibited. e. Landscaping shall be incorporated into the design to soften building masses, reinforce pedestrian scale, and provide screening along public streets and off street parking areas.	**Consistent**. Project landscaping would conform to natural topography, would be comprised of native and climate appropriate plants, would use native plants and not invasive plants, and would be incorporated into building design to soften the proposed industrial building's massing and provide screening.
Policy VH 4.16: Green Building. The City encourages the incorporation of green building practices in design. Such practices may include the use of recycled materials, drought tolerant and native plants, energy efficient features, water conservation, allowance for solar access, and permeable surfaces.	**Consistent**. The project would use 100 percent renewable electricity and would include energy-efficient features, as discussed in Section 4.5, *Energy*. Project landscaping would use drought tolerant and native plants, and the project would use indoor water use efficiency measures.
Transportation Element (TE)	
Policy TE-1.1: Alternative Modes. The City's intent shall be to achieve a realistic and cost-effective balance between travel modes, including bikeways, pedestrian circulation, and bus transit. The City shall encourage the use of alternative modes of transportation, such as bus transit, bicycling, and walking, which have the additional beneficial effect of reducing consumption of non-renewable energy sources.	**Consistent.** The proposed project would include installation of ten bicycle parking spaces, which could promote alternative modes of transportation for residential users within half a mile of the project site. In addition, the project site is within half a mile of the Santa Barbara Metropolitan Transit District Route 6 and 11 on Fairview Avenue west of the project site.
Policy TE 1.6: Development Review. As a condition of approval of new non-residential projects, the City may require developers to provide improvements that will reduce the use of single-occupancy vehicles. These improvements may include, but are not limited to, the following: a. Preferential parking spaces for carpools. b. Bicycle storage, parking spaces, and shower facilities for employees. c. Bus turnouts and shelters at bus stops. d. Other improvements as may be appropriate to the site.	**Consistent.** The proposed project would include installation of 10 bicycle parking spaces.
Policy TE 2.3: Diversion of Automobile Trips to Alternative Modes. The City encourages investment in alternative modes of travel that will make those modes more competitive with auto travel in terms of convenience, accessibility, costs, and safety. These may include, but are not limited to, improvements in the bus transit system, the bikeway system, pedestrian circulation system, and potentially commuter rail services, if the region should determine to pursue this option.	**Consistent.** The proposed project would include installation of 10 bicycle parking spaces. The project site is accessible by bicycle, and the nearest transit stops are located approximately 0.6-mile northwest, thereby providing employees with multiple alternatives for transportation to and from the project site.
Policy TE 4.1: General Level of Service Standard. A traffic LOS standard C shall apply citywide to major arterials, minor arterials, and collector roadways and signalized and unsignalized intersections, except as provided in TE 4.2. The standard shall apply to daily traffic volumes and both AM and PM peak hours for intersections, and to average daily traffic volumes (ADT) for roadway segments.	**Consistent.** As identified in the *Updated Traffic and Circulation Study* (Appendix B), the Hollister Avenue/Kellogg Avenue intersection is forecast to operate at LOS D under cumulative plus project conditions during the PM peak hour. However, the project is required to implement a project-specific Deficiency Plan, which would be incorporated in the project as a Condition of Approval. In addition to implementation of the Deficiency Plan, the project applicant would also be required to pay all applicable development impact fees, including fees under the Goleta Transportation Improvement Program, which funds roadways improvements. Improvements to the Hollister Avenue/Kellogg Avenue intersection would be funded through the Goleta Transportation Improvement Program, and such improvements would improve the LOS at this intersection to at or above LOS C.
Policy TE 4.3: Deficiency Correction Plans. When the LOS for any intersection or arterial link at planned capacity falls below base year standards which are expressed in Table 7-1, the City shall require a Deficiency Plan to be prepared prior to approving any development that would further lower the LOS. The Deficiency Plan shall consider alternative transportation improvements, including alternative modes. Any improvements established in the adopted Deficiency Plan may be provided as mitigation by new development or included in the impact fee system. The Deficiency Plan shall be prepared by the City or at the City's direction within 90 days of publication of a City-approved traffic report indicating degradation of service below base year standards which are expressed in Table 7-1.	**Consistent.** As identified in the *Updated Traffic and Circulation Study* (Appendix B), the Hollister Avenue/Kellogg Avenue intersection is forecast to operate at LOS D under cumulative plus project conditions during the PM peak hour. However, the project applicant would implement a project-specific Deficiency Plan, which would be incorporated in the project as a Condition of Approval. Additionally, the project applicant would be required to pay all applicable development impact fees, including fees under the Goleta Transportation Improvement Program, which funds roadways improvements. Improvements to the Hollister Avenue/Kellogg Avenue intersection established within this Deficiency Plan would be included in the impact fee system.
Policy TE 6.7: Widths of Paved Surfaces. New rights of way and access easements should be paved to the smallest dimension necessary to accommodate their designed function (including emergency access) and to maintain the character of the neighborhood.	**Consistent.** The proposed project design would be reviewed by the Santa Barbara County Fire Department and City to ensure project site access is designed in accordance with applicable emergency access and design standards.
Policy TE 9.2: Adequacy of Parking Supply in Proposed Development. The City shall require all proposed new development and changes/intensifications in use of existing nonresidential structures to provide a sufficient number of off-street parking spaces to accommodate the parking demand generated by the proposed use(s), and to avoid spillover of parking onto neighboring properties and streets	**Consistent.** The proposed project would provide a parking lot with 102 spaces and six truck loading docks which would accommodate employees and visitors at the project site.

Policy	Consistency Discussion
Policy TE 9.4: Parking within Commercial and Industrial Areas. The following standards shall apply to parking within nonresidential areas: a. An adequate number and appropriate type of parking spaces shall be provided on site for new development or changes of use in commercial, business parks, and other industrial areas. b. Supplemental satellite parking facilities are encouraged for large employers to prevent spillover parking into neighboring areas. c. In determining the adequacy of proposed parking for new or substantially modified development, the City may consider proximity to transit facilities and the provisions of a TMP where it is demonstrated that the plan's measures will sufficiently reduce the demand for onsite parking. d. Conditions of approval for large nonresidential projects may include a requirement to prepare a TMP that includes monitoring of parking lot utilization and measures that will be implemented if the event that the supply of onsite parking spaces is inadequate. e. Provision of large amounts of excess parking is discouraged, except that surplus landscaped areas may be identified and reserved for future expansion of parking areas if warranted by future conditions. f. Compact parking spaces and 90-degree parking stalls are discouraged in parking lots serving high-turnover uses, such as (but not limited to) retail commercial centers.	**Consistent.** The proposed project would include parking which would meet the required parking spaces provided in Division 6, Section 35-111 of the City's Municipal Code. The project site is located in proximity to existing transit facilities and would not provide large amounts of excess parking.
Policy TE 10.4: Pedestrian Facilities in New Development. Proposals for new development or substantial alterations of existing development shall be required to include pedestrian linkages and standard frontage improvements. These improvements may include construction of sidewalks and other pedestrian paths, provision of benches, public art, informational signage, appropriate landscaping, and lighting. In planning new subdivisions or large-scale development, pedestrian connections should be provided through subdivisions and cul-de-sacs to interconnect with adjacent areas. Dedications of public access easements shall be required where appropriate.	**Consistent.** The proposed project would include construction of a sidewalk to provide pedestrian access between the project site and South Kellogg Avenue, would be landscaped appropriately, and would include adequate exterior lighting.
Policy TE 11.4: Facilities in New Development. Bicycle facilities such as lockers, secure enclosed parking, and lighting shall be incorporated into the design of all new developments to encourage bicycle travel and facilitate and encourage bicycle commuting. Showers and changing rooms should be incorporated into the design of all new developments where feasible. Transportation improvements necessitated by new development should provide onsite connections to existing and proposed bikeways.	**Consistent**. The proposed project would include the installation of 10 bicycle parking spaces and the proposed industrial building would be adequately lit on the exterior. The project would provide an onsite connection to existing bikeways, as the access road for the project site connects to existing Class III bicycle lanes on South Kellogg Avenue.
Public Facilities Element (PF)	
Policy PF 3.8 Impact Fee for Police Facilities. The City shall continue to require a development impact fee to provide revenue to assist with funding capital facilities for police services.	**Consistent.** The project applicant would be required to pay development impact fees to provide revenue to assist with funding future capital facilities for police services or increased law enforcement personnel.
Policy PF 3.9: Safety Considerations in New Development. All proposals for new or substantially remodeled development shall be reviewed for potential demand for and impacts on safety and demand for police services. The design of streets and buildings should reinforce secure, safe, and crime-free environments. Safety and crime reduction or prevention, as well as ease of policing, shall be a consideration in the siting and design of all new development within the city.	**Consistent.** As discussed in Section 4.12, *Public Services*, the project would not result in a substantial impact to safety or demand for police services. Additionally, the project applicant would be required to pay development impact fees to provide revenue to assist with funding future capital facilities for police services or increased law enforcement personnel.
Policy PF 5.7 School Impact Fees. Where school districts have adopted development impact fees to help finance provision of facilities, the City shall provide information regarding these impact fees to developers and builders. The City shall not issue a building permit for any development subject to such fees without documentation from the applicable district that its fees have been paid. The developer or builder shall be responsible for providing documentation to the City that school impact fees have been paid.	**Consistent.** As discussed in Section 4.12, *Public Services*, the proposed project would be required to pay state-mandated developer fees to fund the construction of school facilities to accommodate students generated from new development projects.
Policy PF 9.3: Responsibilities of Developers. Construction permits shall not be granted until the developer provides for the installation and/or financing of needed public facilities. If adequate facilities are currently unavailable and public funds are not committed to provide such facilities, the burden shall be on the developer to arrange appropriate financing or provide such facilities in order to develop. Developers shall provide or pay for the costs of generating technical information as to the impacts the proposed development will have on public facilities and services. The City shall require new development to finance the facilities needed to support the development wherever a direct connection or nexus of benefit or impact can be demonstrated.	**Consistent.** As discussed in Section 4.12, *Public Services***,** the project applicant would be required to pay development impact fees which would provide funding for fire protection, emergency services, schools, and libraries.
Policy PF 10.2 Development Impact Fees. The City shall adopt and maintain a development impact fee program that requires new development to pay a proportionate share of the costs of new or upgraded capital facilities attributable to new development. Impact fee programs for capital facilities shall include sufficient funding for all of the following: a. Design and engineering. b. Environmental compliance and permitting. c. Land acquisition and/or right-of-way acquisition. d. Site preparation, including grading and installation of utilities, drainage, and other necessary infrastructure. e. Construction of the public facility. f. Parking, landscaping, and street trees, where applicable. g. Necessary off-site improvements, such as sidewalks, extensions of utilities, and others as applicable. The impact fee program shall be reviewed regularly to ensure that sufficient funding will be available to construct all required facilities.	**Consistent.** See discussion for Policy PF 9.3. The project applicant would be required to pay all applicable development impact fees.

Policy	Consistency Discussion
Noise Element (NE)	
Policy NE 1.1: Land Use Compatibility Standards. The City shall use the standards and criteria of Table 9-2 to establish compatibility of land use and noise exposure. The City shall require appropriate mitigation, if feasible, or prohibit development that would subject proposed or existing land uses to noise levels that exceed acceptable levels as indicated in this table. Proposals for new development that would cause standards to be exceeded shall only be approved if the project would provide a substantial benefit to the City (including but not limited to provision of affordable housing units or as part of a redevelopment project), and if adequate mitigation measures are employed to reduce interior noise levels to acceptable levels.	**Consistent.** Short-term construction of the project would temporarily increase local noise levels that may exceed Goleta's construction noise standard of 65 A-weighted decibels; however, the project would include mitigation that would ensure noise levels do not exceed 65 dBA at nearby sensitive receptors. As discussed under Impact NOI-1 in Section 4.11, *Noise*, mitigation would include temporary noise barrier installation, construction signage, and outfitting trucks with "smart alarms" that would reduce noise when operating in reverse.
Policy NE 6.4: Restrictions on Construction Hours. The City shall require, as a condition of approval for any land use permit or other planning permit, restrictions on construction hours. Noise-generating construction activities for projects near or adjacent to residential buildings and neighborhoods or other sensitive receptors shall be limited to Monday through Friday, 8:00 a.m. to 5:00 p.m. Construction in nonresidential areas away from sensitive receivers shall be limited to Monday through Friday, 7:00 a.m. to 4:00 p.m. Construction shall generally not be allowed on weekends and state holidays. Exceptions to these restrictions may be made in extenuating circumstances (in the event of an emergency, for example) on a case by case basis at the discretion of the Director of Planning and Environmental Services. All construction sites subject to such restrictions shall post the allowed hours of operation near the entrance to the site, so that workers on site are aware of this limitation. City staff shall closely monitor compliance with restrictions on construction hours, and shall promptly investigate and respond to all noncompliance complaints.	**Consistent**. Project construction would occur Monday to Friday from 8:00 am to 5:00 pm.

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4.10.4 Cumulative Impacts

As discussed in Section 3.0, *Environmental Setting*, planned, pending and recently approved development in and around Goleta include construction of a total of 469 residential units, 405,404 square feet of industrial space (storage facilities, warehouses, distribution, and delivery facilities, and building additions and renovations), and 116,274 square feet of commercial space (office space, car dealership facilities, and a golf course clubhouse). Although the project would not have a significant cumulative impact regarding the physical division of an established community, conflicts regarding land use compatibility between the project and surrounding uses have been found to be significant and unavoidable. These land use conflicts pertain to aesthetics and biological resources, the cumulative impact of which are analyzed below.

As discussed in Section 4.1, *Aesthetics*, several other projects listed in Table 3-1 in Section 3.0, *Environmental Setting*, would entail construction visible from the SR 217 scenic corridor, such as the San Jose Creek recreational trail improvements and Willow Industrial Park project. However, these construction impacts would be temporary. Cumulative projects within the vicinity of the SR 217 corridor would consist of replacement of existing structures, ground-level improvements, and additions to the Honda and Toyota Dealerships that would not be visible from SR 217, and would not result in the addition of tall structures that could permanently block scenic views from SR 217. Therefore, cumulative impacts to scenic vistas would be less than significant.

As discussed in Section 4.3, *Biological Resources*, previous unpermitted work at the Willow Industrial Park site resulted in the unpermitted storage of crushed asphalt within the SPA buffer area. The Willow Industrial Park project would remove this asphalt and revegetate the SPA buffer area appropriately. No cumulative projects would result in reduction in the SPA buffer area. Therefore, cumulative impacts related to conflicts with the SPA buffer area would be less than significant.

Proposed project improvements within the SPA buffer for San Jose Creek include the detention basin and drainage outfall, utilities, access, landscaping, parking, retaining walls, the placement of fill, and a construction noise barrier required under Mitigation Measure NOI-1. When combined with past, present, and reasonably foreseeable construction projects in the area, the proposed project would not result in a cumulatively considerable SPA impact given the temporary work for Willow Industrial Park would abate zoning violations and would not reduce the SPA buffer area.

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4.11 Noise

This section discusses the project's potential impacts relating to noise and groundborne vibration. Sound level measurement data is included in Appendix K.

4.11.1 Environmental Setting

Environmental Noise

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

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; dividing the energy in half would result in a 3 dB decrease.

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible; and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud.

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

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

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

Groundborne Vibration

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

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

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

However, under rare circumstances, the ground-to-foundation coupling may actually amplify the vibration level due to structural resonances of the floors and walls.

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

Existing Ambient Noise Environment

The primary noise source on the project site is vehicular traffic from State Route (SR) 217, as well as operational noise from the industrial and commercial uses to the west and to the north. In addition, aircraft noise can be heard at the project site as it is within the 60 CNEL noise contour from Santa Barbara Airport, which is approximately 1,100 feet to the west (SBCAG 2023). Existing noise levels at the project site were documented using two 24-hour ambient noise measurements. The measurements were collected at location LT1 in the northeast corner of the project site (near the commercial and industrial area to the north) and LT2 at the western edge of the project side (near the commercial and industrial area to the west, which includes some residential housing). Noise measurements were conducted using an Extech 407780A integrating sound-level meter positioned at a height of approximately 5 feet above ground level. Figure 4.11-1 depicts the measurement locations and Table 4.11-1 describes the measurement results. As indicated in Table 4.11-1, measured ambient noise levels in the project site vicinity ranged from approximately 47 to 65 dBA L_{eq}, with a CNEL of 61 at LT1 and a CNEL of 63 at LT2. Sound level measurement data is included in Appendix K.

Sensitive Noise Receptors

The General Plan Noise Element defines sensitive receptors as users or types of uses that are interrupted (rather than merely annoyed) by relatively low levels of noise. These include residential neighborhoods, schools, libraries, hospitals and rest homes, auditoriums, certain open space areas, and public assembly places. Sensitive receptors nearest to the project site consist of single-family residences to the west of the project site Sensitive receivers nearest to the project site consist of mobile homes in the Rancho Goleta mobile home community, located approximately 325 feet east of the project site. Additional sensitive receptors are found approximately 340 feet west of the project site at single-family residences. The nearest school is Rainbow School, located approximately 2,200 feet to the north.

Figure 4.11-1 Ambient Noise Monitoring Location



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Table 4.11-1 Project Site Vicinity Noise Monitoring Results

Sample Time	dBA L_{eq}	Sample Time	dBA L_{eq}
LT1 24-hour Measurement – Northeastern Portion of Site – February 8-9th, 2023			
10:19 a.m.	65	10:19 p.m.	51
11:19 a.m.	59	11:19 p.m.	53
12:19 p.m.	54	12:19 a.m.	51
1:19 p.m.	55	1:19 a.m.	47
2:19 p.m.	55	2:19 a.m.	48
3:19 p.m.	56	3:19 a.m.	51
4:19 p.m.	59	4:19 a.m.	53
5:19 p.m.	57	5:19 a.m.	55
6:19 p.m.	53	6:19 a.m.	61
7:19 p.m.	54	7:19 a.m.	59
8:19 p.m.	55	8:19 a.m.	63
9:19 p.m.	53	9:19 a.m.	52
24-hour Noise Level (CNEL)			**61**
LT2 24-hour Measurement – Southwestern Portion of Site – February 8-9th, 2023			
10:19 a.m.	53	10:19 p.m.	51
11:19 a.m.	54	11:19 p.m.	49
12:19 p.m.	49	12:19 a.m.	51
1:19 p.m.	48	1:19 a.m.	50
2:19 p.m.	61	2:19 a.m.	49
3:19 p.m.	61	3:19 a.m.	54
4:19 p.m.	57	4:19 a.m.	55
5:19 p.m.	55	5:19 a.m.	62
6:19 p.m.	61	6:19 a.m.	57
7:19 p.m.	64	7:19 a.m.	55
8:19 p.m.	58	8:19 a.m.	57
9:19 p.m.	52	9:19 a.m.	51
24-hour Noise Level (CNEL)			**63**

4.11.2 Regulatory Setting

State

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires each county and city to adopt a General Plan that includes a Noise Element prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. The California Environmental Quality Act requires all known environmental effects of a project be analyzed, including environmental noise impacts.

California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions, including the City of Goleta, have the responsibility to set specific noise standards based on local conditions.

California Noise Control Act of 1973

California Health and Safety Code Sections 46000 through 46080, known as the California Noise Control Act, find that excessive noise is a serious hazard to public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. The act also finds that there is a continuous and increasing bombardment of noise in urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the State to provide an environment for all Californians that is free from noise that jeopardizes their health or welfare.

Local

City of Goleta Noise Element

The Noise Element of the Goleta General Plan establishes noise standards for various land use categories based on the U.S. Department of Housing and Urban Development Guidelines and standards from the California Office of Noise Control. The City recommends 50-70 dBA as the "normally acceptable" range and 70-75 dBA as the "conditionally acceptable" range for industrial uses. According to the Goleta General Plan, industrial uses within the "normally acceptable range" are deemed satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements. Development of industrial uses within the "conditionally acceptable" range should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design (Goleta 2006). Table 4.11-2 shows the normally acceptable and conditionally acceptable ranges for each land use category. According to Noise Element Policy NE 1.1, the City requires mitigation for development that would subject proposed land uses to noise levels that exceed the acceptable levels shown in Table 4.11-2.

Table 4.11-2 Goleta Noise and Land Use Compatibility Criteria

Land Use Category	Community Noise Exposure Ldn or CNEL, dBA			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density	50-60	60-65	65-75	75-85+
Residential – Multi-Family	50-60	60-65	65-75	75-85+
Transient Lodging – Motels, Hotels	50-65	65-70	70-80	80-85+
Schools, Libraries, Churches, Hospitals, Nursing Homes	50-60	60-65	65-80	80-85+
Auditoriums, Concert halls, Amphitheaters	NA	50-65	NA	65-85+
Sports Arena, Outdoor Spectator Sports	NA	50-70	NA	70-85+
Playgrounds, Neighborhood Parks	50-70	NA	70-75	75-85+
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50-70	NA	70-80	80-85+
Office Buildings, Business Commercial and Professional	50-67.5	67.5-75	75-85+	NA
Industrial, Manufacturing, Utilities, Agriculture	50-70	70-75	75-85+	NA

Normally Acceptable – Specified land uses is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable – new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made, needed noise reduction requirements are made, and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Source: Goleta General Plan Noise Element, 2006

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

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

City of Goleta Noise Element Policy NE 5.5 provides guidance for truck delivery noise. The policy states that the City shall consider requiring commercial and industrial uses that abut residential zones to restrict the hours of truck deliveries and trash pickups to minimize disruption to nearby residences, where practicable. Such restrictions may be imposed by incorporation of conditions of approval for new discretionary planning permits, or on a citywide basis through preparation and adoption of a

Noise Ordinance. Limitations on hours for trash pickups should be considered during negotiation of new or renewed franchise agreements with trash haulers.

Goleta Municipal Code Chapter 9.09

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

4.11.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Construction Noise

Short-term noise impacts associated with construction activities were analyzed based on typical construction equipment noise levels derived from the FHWA's Roadway Construction Noise Model (RCNM). Typical equipment use for various phases of construction were based on default assumptions identified in CalEEMod that was used for the air quality analysis (see Appendix C), with a grader, excavator, and a loader as the three loudest pieces of construction equipment. For general construction activities, predicted average-hourly construction noise levels (in dBA L_{eq}) were calculated assuming the equipment would operate simultaneously 350 feet from the nearest sensitive receptor to the east and 425 feet from the nearest sensitive receptor to the west. For joint utility trench construction activities, the analysis assumed the equipment would operate simultaneously at 325 feet from the nearest sensitive receptor to the east and 475 feet from the nearest sensitive receptor to the west. Noise levels are predicted in RCNM based on an average noise-attenuation rate of 6 dB per doubling of distance from the source.

Construction Vibration

Groundborne vibration levels associated with construction activities were estimated based on the estimates in the Caltrans' *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020). Potential vibration levels were identified for locations that are sensitive to vibration, including nearby residences. The greatest vibratory source during construction in the project vicinity would be a large bulldozer. Neither blasting nor pile driving would be required for construction of the project. Construction vibration estimates are based on vibration levels reported by Caltrans and the FTA (Caltrans 2020, FTA 2018). Table 4.11-3 shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration (FTA 2018).

Table 4.11-3 Typical Vibration Levels From Construction Activities

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

Source: FTA 2018

Vibration limits used in this analysis to determine a potential impact to local land uses from construction activities are based on information contained in Caltrans' *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020). To assess the damage potential from ground vibration induced by construction equipment, Caltrans created a synthesis of various vibration criteria that are identified in Table 4.11-4. Based on Caltrans recommendations, limiting vibration levels to below 0.5 PPV in/sec for transient sources and 0.3 PPV in/sec for continuous sources at older residential structures would prevent structural damage.

Table 4.11-4 Caltrans Vibration Damage Potential Threshold Criteria

	Maximum PPV (in/sec)	
Structure and Condition	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans 2020

Stationary Noise

Most warehousing/distribution activities associated with project operation would be conducted inside the proposed building, which would shield nearby noise-sensitive receptors from interior operational noise levels. Therefore, the primary on-site noise source associated with operation of the proposed project would consist of noise from loading dock activities, particularly that of medium- and heavy-duty trucks (e.g., engine startups, alarms, parking), and noise from roof-top mounted heating, ventilation, and air conditioning (HVAC) equipment. Reference sound power levels of 96 dBA for trucks during loading and unloading activities from the Noise Impact Analysis for the Bloomington Truck Terminal prepared by LSA Associates, Inc. (LSA) were used to analyze operational noise impacts related to on-site loading dock activities (LSA 2013). These reference sound power levels are relevant to the proposed project because they represent similar activities to those that would occur with the proposed project.

The primary mechanical equipment noise generator during project operation would be HVAC units. The unit used in this analysis is a 16.7-ton Carrier 38AUD25 split system condenser (see Appendix K for manufacturer's specifications). The industrial building was assumed to contain seven HVAC units

based upon one ton of HVAC per 600 sf of building space, as shown in Table 4.11-5. The manufacturer's noise data lists the unit as having a sound power level of 85 dBA. For a conservative analysis, units were assumed to be located in a cluster on the rooftop near the building edge with each sensitive receptor.

Table 4.11-5 Modeled HVAC

Use/Description	Building Square Footage	Model	Estimated HVAC Tons	Estimated HVAC Units	Sound Power Level per Unit
Warehouse	70,594	38AUD25	118	7	85
See Appendix K for HVAC specification sheets.					

Traffic Noise

The project's operational vehicle trips would primarily generate additional traffic noise on nearby roadways such as Kellogg Avenue, Pine Avenue, and Hollister Avenue. Traffic increases from the project to these roadways, per the Updated Traffic and Circulation Study prepared for the project by Associated Transportation Engineers (Appendix B), are included in Table 4.11-6.

Table 4.11-6 Project Trip Generation

	Average Daily Trips (ADT)	
Roadway Segment	Existing	Existing + Project
Pine Avenue, south of Hollister Avenue	4,000	4,030
Kellogg Avenue, south of Hollister Avenue	4,600	4,822
Hollister Avenue, east of Kellogg Avenue	22,600	22,777
Source: Updated Traffic and Circulation Study prepared by Associated Transportation Engineers (Appendix B)		

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. The following criteria are based on Appendix G of the State CEQA Guidelines. An impact would be considered potentially significant if the project would result in one or more of the following conditions:

1. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
2. Generation of excessive groundborne vibration or groundborne noise levels; or
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, exposure of people residing or working in the project area to excessive noise levels.

Short-Term Construction Noise

The City of Goleta Noise Element restricts construction activities near or adjacent to residential buildings and other sensitive receptors to the hours of 8:00 AM to 5:00 PM Monday through Friday and 7:00 AM to 4:00 PM Monday through Friday for construction in nonresidential areas. According to the County's 2021 *Environmental Thresholds and Guidelines Manual* (refer to Section 4.0,

Environmental Impact Analysis), impacts would be significant if construction noise exceeds 65 dBA at nearby sensitive receptors.

Long-Term Operational Noise Impacts

According to the County's *Environmental Thresholds and Guidelines Manual*, if existing exterior noise levels, including at outdoor living areas, experienced by sensitive receptors is below 65 dB(A) CNEL, and if the proposed project will generate noise that will cause the existing noise levels experienced by the sensitive receptors to exceed 65 dB(A) CNEL – either individually or cumulatively when combined with other noise-generating sources – then the proposed project is presumed to have a significant impact. If existing exterior noise levels, including at outdoor living areas, experienced by sensitive receptors exceeds 65 dB(A) CNEL, and if the proposed project will generate noise that will cause the existing noise levels experienced by the sensitive receptors to increase by 3 dB(A) CNEL – either individually or cumulatively when combined with other noise-generating sources – then the proposed project is presumed to have a significant impact.

For traffic-related noise, impacts would be considered significant if project-generated traffic would result in exposure of sensitive receptors to an unacceptable increase in noise levels. For purposes of this analysis, a significant impact would occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 3 dBA or more if the locations are subject to noise levels in excess of the conditionally acceptable noise levels in Table 4.11-2, or by 5 dBA or more if the locations are not subject to noise levels in excess of the aforementioned standards.

Groundborne Vibration Impacts

Based on Caltrans recommendations, limiting vibration levels to below 0.5 PPV in/sec for transient sources and 0.3 PPV in/sec for continuous sources at older residential structures would prevent structural damage.

Exposure to Excessive Airport Noise Levels

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

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project result in generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Construction)

Impact NOI-1 SHORT-TERM CONSTRUCTION OF THE PROJECT WOULD TEMPORARILY INCREASE LOCAL NOISE LEVELS THAT MAY EXCEED GOLETA'S CONSTRUCTION NOISE STANDARD OF 65 A-WEIGHTED DECIBELS. THROUGH IMPLEMENTATION OF MITIGATION MEASURE NOI-1, IMPACTS WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

Construction activities such as demolition, grading, and building construction on the project site would temporarily increase noise levels at noise-sensitive receptors in the project site vicinity. Exposure to construction noise would depend on the type of construction equipment, the location

and sensitivity of nearby land uses, and the timing and duration of the construction activities. Construction would involve the use of both mobile equipment (e.g., dozers and pavers) and stationary equipment (e.g., generators and air compressors). Construction would occur Monday to Friday from 8:00 am to 5:00 pm.

Estimated construction noise levels are provided in Table 4.11-7, using the construction equipment and distances described under Methodology. As shown in the table, the residences to the west are located a sufficient distance from the project site such that noise levels would not exceed 65 dBA, and no noise control is needed during construction to reduce noise levels for these receptors. However, construction noise levels from both general construction activities and joint utility trench construction activities may exceed Goleta's 65 dBA standard at the residences at the Rancho Goleta mobile home community to the east. Therefore, impacts would be significant and mitigation is required.

Table 4.11-7 Construction Noise Levels

Receptor	Land Use Type	Direction from Project Site	Distance from Construction (feet)	Noise Level (dBA Leq)[1]		Exceed Threshold?[2]
				General Construction	Joint Utility Trench Construction	
1150 S Fairview Ave	Single-family	West	425	65	64	No
Rancho Goleta Community	Mobile Home	East	325	66	67	**Yes**

[1] The loudest construction scenario analyzed for both activities was assumed to be a grader, excavator, and loader.

[2] The City of Goleta threshold is if construction noise exceeds 65 dBA.

RCNM outputs are included in Appendix K.

Mitigation Measures

NOI-1 Construction Noise Reduction

The construction contractor shall prepare and submit a Construction Noise Control Plan to the City of Goleta Planning and Environmental Review Director or designee for review and approval prior to issuance of a Zoning Clearance for a grading permit/demolition permit. The Construction Noise Control Plan shall specify the noise reduction measures to be implemented during project construction to ensure noise levels do not exceed 65 dBA at nearby sensitive receptors at the Rancho Goleta mobile home community to the east. The measures specified in the Construction Noise Control Plan shall be included on the building and grading plans and shall be implemented by the construction contractor during construction. At a minimum, the Construction Noise Control Plan shall include the following measures:

- Installation of 12-foot high temporary sound barriers/blankets to break the line of sight between construction equipment and nearby residences at the Rancho Goleta mobile home community to the east. See Figure 4.11-2 for an approximation of the extent of the temporary noise barrier. The barriers shall be at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. Alternately, if sound blankets are preferred, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher.

Figure 4.11-2 Temporary Noise Barrier Location



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- To the extent consistent with applicable safety regulations, trucks operating with reverse motions alarms shall be outfitted with SAE J994 Class D or equivalent alarms (ambient-adjusting, or "smart alarms" that automatically adjust the alarm to 5 dBA above the ambient near the operating equipment), or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.
- A construction notification sign shall be posted at the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City of Goleta's and the contractor's authorized representatives that are assigned to respond in the event of a noise complaint. If the authorized contractor's representative receives a complaint, that person shall investigate, take appropriate corrective action, and report the action to the City of Goleta.

Plan Requirements and Timing: The Planning and Environmental Review Director or designee shall approve the Construction Noise Control Plan prior to issuance of the Zoning Clearance for the grading permit/demolition permit. The measures specified in the Construction Noise Control Plan shall be included on the building and grading plans Sound barrier and blankets and construction notification sign shall be installed on the project site prior to initiation of ground-disturbance activities and shall be maintained throughout the duration of construction. Reverse motions alarms and upgraded silencers shall be outfitted on construction vehicles and equipment throughout the duration of construction where feasible.

Monitoring: The City shall monitor compliance with the requirements of the Construction Noise Control Plan periodically during construction and shall promptly investigate and respond to all noise complaints.

Significance After Mitigation

Implementation of Mitigation Measure NOI-1 would include a temporary noise barrier. To estimate the sound level reduction from a temporary noise barrier, the barrier was assumed to be constructed with a solid material that has a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. With these assumptions, the estimated noise reduction from a 12-foot temporary noise barrier which would block the line-of-sight between the equipment exhaust stacks and receptors to the east would be 15 dBA. With this reduction, noise levels at the closest residences to the site would be approximately 65 dBA and noise levels at the Rancho Goleta Community would be 52 dBA. Therefore, construction noise levels would not exceed Goleta's 65 dBA construction noise standard, and impacts would be less than significant with mitigation.

Threshold 1:	Would the project generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Stationary)

Impact NOI-2 THE PROJECT WOULD INCLUDE LOADING BAY AND MECHANICAL EQUIPMENT ACTIVITIES THAT WOULD INCREASE NOISE LEVELS DURING PROJECT OPERATION. HOWEVER, NOISE LEVELS GENERATED DURING PROJECT OPERATION WOULD NOT EXCEED THE CITY'S NOISE THRESHOLDS AT THE NEAREST PROPERTIES. IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Loading Bay Activities

Potential truck activities on site include four loading bays on the western side of the building, one loading bay that faces east on the southern side of the building, and one loading bay that faces west on the northern side of the building. Noise from truck and unloading activities at the loading docks would generate noise that has the potential to increase noise at nearby sensitive receptors. The noise scenario analyzed for loading activities included these six bays generating noise levels at the nearest residences to the west. Analyzing all six bays operating at once is a conservative assumption as the diesel trucks would idle no more than 5 minutes during each loading/unloading operation per State idling regulations (CCR Title 13, Section 2485). The nearest residences are located amongst commercial and industrial uses. Delivery trucks at the proposed loading docks are assumed to have similar noise levels to ones obtained in the Noise Impact Analysis (2013) for the Bloomington Truck Terminal (LSA 2013) because the on-site activities would be similar. Even though the reference levels in that analysis are over 10 years old, the type of noise generated by a heavy truck during a loading bay activity would be similar in the present day. In addition, geographical location would not have an effect on truck noise, and thus an analysis conducted in San Bernardino County would be applicable to Goleta. Based on that analysis, the sound power level for an idling diesel truck is approximately 96 dBA. This analysis conservatively does not account for attenuation from the proposed building (e.g., noise from the loading bays would be partially or fully shielded from the residences). Loading bay noise is shown in Table 4.11-8.

Table 4.11-8 shows that the noise levels at the nearby residences are generally higher for the four loading bays at the north end compared to the other configurations. The combined loading dock noise level is highest at 1150 South Fairview Avenue, with a noise level of 51 dBA. However, these noise levels would be well below the City's 65 dBA CNEL standard. In addition, ambient noise levels were measured as 63 dBA CNEL near 1150 South Fairview Avenue, with similar ambient noise levels expected at Rancho Goleta mobile home community due to the exposure of the community to SR 217 and Santa Barbara Airport noise levels; therefore, the loading dock noise levels would not exceed existing ambient noise levels.

Table 4.11-8 Loading Bay Noise

Receptor	Land Use Type	Direction from Project Site	Four Loading Bays – West End		One Loading Bay – North End		One Loading Bay – South End		Combined Noise Level (dBA)	Exceed Threshold?[1]
			Distance from Source	Noise Level (dBA)	Distance from Source	Noise Level (dBA)	Distance from Source	Noise Level (dBA)		
1150 S Fairview Ave	Single-family	West	575	49	775	41	550	44	51	No
Rancho Goleta Community	Mobile Home	East	685	48	530	44	580	43	50	No

[1] The City of Goleta threshold is if operational noise increases noise levels to exceed 65 dBA CNEL at sensitive receptors if existing noise levels are below 65 dBA CNEL, or if existing noise levels already exceed 65 dBA CNEL, if the operation noise increases noise levels by 3 dBA CNEL or more.

Mechanical Equipment

The proposed industrial building would include HVAC units that would generate noise that could increase ambient noise levels at nearby sensitive receptors. As described under Section 4.11.3, *Methodology*, seven HVAC units, each with a sound power level of 85 dBA, were assumed to be located in a cluster on the rooftop; for each sensitive receptor, it was conservatively assumed that they would be located at the closest building edge to that receptor. The rooftop would be lined with a parapet wall that would provide noise screening and was assumed to result in a 5 dBA reduction. HVAC noise levels are shown in Table 4.11-9.

Table 4.11-9 HVAC Noise

Receptor	Land Use Type	Direction from Project Site	Distance from Source	HVAC Units Noise Level (dBA)	Exceed Threshold?[1]
1150 S Fairview Ave	Single-family	West	530	41	No
Rancho Goleta Community	Mobile Home	East	450	42	No

[1] The City of Goleta threshold is if operation increases noise levels to exceed 65 dBA CNEL at sensitive receptors if existing noise levels are below 65 dBA CNEL, or if operation increases noise levels by 3 dBA CNEL or more if existing noise levels already exceed 65 dBA CNEL.

The table shows that the HVAC noise level is highest at the Rancho Goleta mobile home community, with a noise level of 50 dBA. The noise levels would be well below the City's 65 dBA CNEL standard. In addition, ambient noise levels were measured as 61 dBA CNEL near 906 South Kellogg Avenue and 63 dBA CNEL near 1150 South Fairview Avenue, with similar ambient noise levels expected at Rancho Goleta mobile home community; therefore, the HVAC noise levels would not exceed existing ambient noise levels.

Combined Operational Noise Levels

The combined noise levels from loading bay activities and HVAC equipment are shown in Table 4.11-10. These noise levels would be well below the City's 65 dBA CNEL standard, and below the existing ambient noise levels. Therefore, operational noise from the proposed project would be less than significant.

Table 4.11-10 Combined Operational Noise Levels

Receptor	Land Use Type	Direction from Project Site	Loading Bays Noise Level (dBA)	HVAC Units Noise Level (dBA)	Combined Noise Level (dBA)	Exceed Threshold?[1]
1150 S Fairview Ave	Single-family	West	51	41	51	No
Rancho Goleta Community	Mobile Home	East	50	42	51	No

[1] The City of Goleta threshold is operation increases noise levels to exceed 65 dBA CNEL at sensitive receptors if existing noise levels are below 65 dBA CNEL, or operation increases noise levels by 3 dBA CNEL or more if existing noise levels already exceed 65 dBA CNEL.

Mitigation Measures

No mitigation measures are required.

Threshold 1:	Would the project generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Traffic)

Impact NOI-3 PROJECT CONSTRUCTION AND OPERATION WOULD GENERATE NEW VEHICLE TRIPS THAT WOULD INCREASE NOISE LEVELS ON NEARBY ROADWAYS. PROJECT CONSTRUCTION AND OPERATION WOULD NOT RESULT IN A TRAFFIC NOISE INCREASE OF 3 A-WEIGHTED DECIBELS OR MORE; IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Off-Site Traffic Noise

CONSTRUCTION

The transport of workers and materials to and from the construction site would incrementally increase noise levels along roadways in the vicinity of the project site. Individual construction vehicle pass-bys and haul truck trips may create momentary noise levels of up to approximately 85 dBA (L_{max}) at 50 feet from the vehicle, but these occurrences would generally be infrequent and short lived.

Construction generates temporary worker, vendor, and soil import haul trips, and the number of trips vary by activity phase. Construction vehicles would generate up to 60 worker trips and 23 vendor trips during building construction. The proposed project would generate up to 220 daily haul truck trips for grading work. Existing daily volumes Pine Avenue, Kellogg Avenue, and Hollister Avenue range between 4,000 and 22,600 daily trips (Appendix B). When compared to existing daily trips, worker and vendor trips would result in a noise increase less than 0.2 dBA. The increase in haul truck trips would also result in a noise increase of 0.2 dBA. Therefore, noise impacts related to temporary construction vehicle trips would be less than significant.

OPERATION

Project operation would generate new vehicle trips that would increase noise levels on nearby roadways, such as Pine Avenue, Kellogg Avenue, and Hollister Avenue. As shown in the Table 4.11-11, noise levels related to the additional trips would increase by only 0.2 dBA typically during daytime hours. Therefore, the project would not result in a traffic noise increase of 3 dBA or more, and impacts would be less than significant.

Table 4.11-11 Predicted Increases in Traffic Noise Levels

Roadway Segment	Average Daily Trips (ADT)		Noise Level Increase (dBA)	Significant Impact? [1]
	Existing	Existing Plus Project		
Pine Avenue, south of Hollister Avenue	4,000	4,030	<0.1	No
Kellogg Avenue, south of Hollister Avenue	4,600	4,822	0.2	No
Hollister Avenue, east of Kellogg Avenue	22,600	22,777	<0.1	No

[1] A significant impact would occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 3 dBA or more if.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	Would the project generate excessive groundborne vibration or groundborne noise levels?

Impact NOI-4 PROJECT CONSTRUCTION WOULD RESULT IN GROUNDBORNE VIBRATION IN THE PROJECT SITE VICINITY. VIBRATION LEVELS DURING PROJECT CONSTRUCTION WOULD NOT CAUSE DAMAGE TO NEARBY STRUCTURES. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be used to construct the industrial building and supporting facilities. The greatest anticipated source of vibration during general project construction activities would be from a dozer, which would be used as close as 50 feet during construction from the nearest buildings to the northeast. A dozer would create a vibration level of approximately 0.089 PPV in/sec. at a distance of 25 feet (Caltrans 2020). This would equal a vibration level of approximately 0.042 PPV in/sec. at a distance of 50 feet.[1] This vibration level would be well below the Caltrans vibration damage potential threshold for older structures of 0.3 PPV in/sec for continuous/frequent intermittent sources. Therefore, temporary impacts associated with the dozer (and other potential equipment) would be less than significant.

Operational activities known to generate excessive ground-borne vibration include projects involving railroads and subways. The proposed project would not involve substantial vibration sources associated with operation such as this because as an industrial warehouse building, the project [please include brief explanation for why project operation would not involve substantial vibration sources]. Therefore, the proposed project's operational groundborne vibration and noise impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3:	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact NOI-5 THE PROJECT WOULD NOT RESULT IN EXPOSURE OF PEOPLE WORKING IN THE AREA TO EXCESSIVE AIRPORT NOISE LEVELS. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The project site is located within the 60 to 65 CNEL noise contour from Santa Barbara Airport, which is approximately 1,100 feet to the west (SBCAG 2023). This would be a noise exposure within the City's "normally acceptable" recommendation for noise levels for industrial uses, which is up to 70 CNEL. Therefore, construction workers building the proposed project or workers of the industrial building would not be exposed to excessive airport noise levels, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

[1] $PPV_{Equipment} = PPV_{Ref}(25/D)^n$ (in/sec), PPV_{Ref} = reference PPV at 25 feet, D = distance ,and n = 1.1

4.11.4 Cumulative Impacts

Construction noise is localized and rapidly attenuates within an urban environment. Some construction activities from the cumulative projects listed in Table 3-1 in Chapter 3, *Environmental Setting*, may occur within several hundred feet of the nearest sensitive receptors to the west and east (e.g., Security Paving, San Jose Creek Fish Passage Project, and Willow Industrial Park), and therefore may expose these receivers to construction noise simultaneously with construction noise generated from the project site. Theoretically this could result in increased noise exposure to the sensitive receivers from combined noise levels; however, real world conditions would result in less of a cumulative effect through noise direction, angles, attenuation, and dispersion, especially as these projects would be generating noise from an entirely different direction to the nearest sensitive receivers as they are located north of those receivers, as opposed to the proposed project that is located south of those receivers. The Willow Industrial Park would not include any buildings and would be limited to outdoor storage, therefore, limited construction noise would likely occur. Construction at Security Paving concluded in Spring 2024, and thus would not overlap with construction with the proposed project. In addition, those projects would also be required to comply with City of Goleta standards (e.g., restricting construction noise levels to 65 dBA or less). The project would implement Mitigation Measure NOI-1 to reduce project construction noise levels to comply with Goleta's construction noise thresholds. Therefore, while cumulative construction noise may occur from the project and simultaneous construction of another project within several hundred feet, a substantial cumulative construction noise impacts would not occur as in practice this effect would be minimal as previously explained.

Similar to construction noise, construction vibration is localized and rapidly attenuates within an urban environment. As discussed under Impact NOI-4, construction vibration from the project would be well under vibration limits. Potential vibration from the closest cumulative projects (e.g., Security Paving, San Jose Creek Fish Passage Project, and Willow Industrial Park) would occur from a different direction from the nearest sensitive receptor than the proposed project and thus approach different angles of the nearest vibration sensitive receivers, thus ensuring the vibration travels further distances before it could theoretically combine with the project's vibration. As those projects would be constructed at a similar or further distance from the nearest sensitive receiver, their vibration levels would be anticipated to be well below vibration limits as well. While higher vibration levels can occur from activities such as blasting or pile driving, construction that occurs in bedrock areas or involves substantial underground excavation requiring building piles would not be anticipate for the types of project proposed nearby. The Willow Industrial Park proposal is being changed to not include any buildings and would be limited to outdoor storage, therefore, limited construction noise would likely occur. Construction at Security Paving was completed in Spring 2024, and thus would not overlap on construction with the proposed project. Therefore, the combined vibration level from cumulative projects would still be well below vibration limits, and no cumulative construction vibration impact would occur.

Some cumulative projects listed in Table 3-1 would include similar operational noise sources as the proposed project (e.g., mechanical equipment noise, heavy truck noise). Operational noise from these sources is localized and rapidly attenuates due to the effects of distance, intervening structures, and topography that block the line of sight. In addition, other ambient noise sources in closer proximity to the receptors would dominate the soundscape, effectively masking project-related noise leading to a cumulative increase. Therefore, the ability of project noise to combine with noise from off-site sources to create a substantial increase in noise levels would not occur. As discussed in Impact NOI-3, the project's addition to traffic would not result in a noticeable off-site traffic noise increase; thus,

the project's traffic noise increase would not be cumulatively considerable particularly given the ambient noise setting of the area from Santa Barbara airport and Highway 217. No cumulative operational noise impacts would occur.

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4.12 Public Services

This section analyzes impacts to fire and police protection services, public schools, and library facilities. Potential impacts to public parks and recreational facilities are described in Section 4.15.4, *Parks and Recreation*, in Section 4.15, *Effects Found Not to Be Significant*.

4.12.1 Environmental Setting

a. Fire Protection

The Santa Barbara County Fire Department (SBCFD) provides fire protection and emergency services to unincorporated Santa Barbara County, Buellton, Solvang, and Goleta. SBCFD consists of 16 fire stations, a crew program, a construction section, an air support unit, a Fire Prevention Division, and support and administrative staff. The SBCFD has approximately 214 sworn firefighters who provide fire protection services to a service population of approximately 174,268 people (SBCFD 2023a). In 2021, the most recently available public data, SBCFD responded to 535 fire-related incidents and 10,788 emergency medical incidents (SBCFD 2022). There are currently three fire stations in Goleta: County Station 11, County Station 12, and County Station 14. The project site is within the existing service area of County Station 12, located approximately 1.3 miles northeast of the project site at 5330 Calle Real. County Station 12 is staffed by one Captain, one Engineer, and one Firefighter. County Station 12 is adequately equipped such that personnel can perform Advanced Life Support if necessary (SBCFD 2023b). In addition, a proposal for a new fire station, Fire Station 10, in western Goleta has undergone environmental review and been approved by the California Coastal Commission. As of February 2023, the City is in the process of reviewing final plans for Fire Station 10 (SBCDF 2023c).

b. Police Protection

The Santa Barbara County Sheriff's Office (SBCSO) provides police services to Goleta. The SBCSO consists of approximately 600 employees and 150 volunteers. The SBCSO has a jurisdiction which includes approximately 443,000 people and has approximately 260 law enforcement deputies and approximately 200 custody deputies (SBCSO 2023). Goleta is divided by three "beats" or patrol units, with one police car assigned to each area. SBCSO officers assigned to the unincorporated area of Santa Barbara are available to supplement SBCSO units within Goleta, as needed, for emergency response within Goleta's city limits (City of Goleta 2006a). The SBCSO assigns officers based on a Deputy Service Unit, which is equivalent to the sworn and support personnel required to staff one patrol position 24 hours a day for one year, which is the equivalent of 8,760 hours. The City currently has the equivalent of three Deputy Service Units, as well as two Community Resource Deputies, one detective, one parking enforcement officer, and four traffic motorcycle deputies (Valdez 2023). The nearest SBCSO station to the project site is located approximately 3 miles northwest at 4434 Calle Real.

c. Public Schools

The Goleta Union School District (GUSD) and the Santa Barbara Unified School District (SBUSD) provide public school service to Goleta. GUSD is comprised of one preschool and nine elementary schools. GUSD operates six public schools (Brandon, Ellwood, Fairview, Isla Vista, Kellogg, and La Patera) located within Goleta and four public schools (El Camino, Foothill, Hollister, and Mountain View) located within unincorporated areas of the Goleta Valley (California Department of Education

2023a). SBUSD oversees the secondary schools of the Goleta Valley Junior High School and Dos Pueblos High School within Goleta's city limits (California Department of Education 2023b).

d. Libraries

Library services in Goleta are provided by the Goleta Valley Library, located at 500 North Fairview Avenue. The Goleta Valley Library's service population is approximately 95,202 people. In fiscal year 2018/2019, the most recent publicly available information, library visits totaled 261,316, physical item circulation totaled 605,935 items, and electronic item circulation totaled 75,610 items (City of Goleta 2019).

4.12.2 Regulatory Setting

a. Federal Regulations

Disaster Mitigation Act

Section 104 of the Disaster Mitigation Act of 2000 (Public Law 106-390) requires a state mitigation plan as a condition of disaster assistance. There are two different levels of state disaster plans: "Standard" and "Enhanced." States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act has also established new requirements for local mitigation plans.

Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administrations (OSHA) as well as California OSHA (Cal/OSHA) enforce the provisions of the federal and State Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction in accordance with Part 1926 of Title 29 Code of Federal Regulations. The fire-related requirements of the Federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

b. State Regulations

2019 California Strategic Fire Plan

The 2019 California Strategic Fire Plan (Fire Plan) is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE. The 2019 Fire Plan reflects a focus on fire prevention, suppression activities, and natural resource management to maintain the State's forests as a resilient carbon sink to meet California's climate change goals and to serve as important habitat for adaptation and mitigation. Major components center on accomplishing the following goals by 2023 - improve core capabilities; enhance internal operations; ensure health and safety; and build an engaged, motivated, and innovative workforce (CAL FIRE 2019).

State Hazard Mitigation Plan

The State Hazard Mitigation Plan (SHMP) intends to significantly reduce deaths, injuries, and other losses attributed to natural and human-caused hazards in California. The SHMP provides guidance for hazard mitigation activities emphasizing partnerships among local, State, and federal agencies as well as the private sector. The SHMP is federally required in accordance with the Disaster Mitigation Act of 2000 in order for the State to receive federal funding for disaster assistance. The California Office of Emergency Services prepares the California SHMP, which identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy (California Office of Emergency Services 2018).

California Fire Code

The California Fire Code is Part 9 of California Code of Regulations (CCR) Title 24. It establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises and to provide safety and assistance to firefighters and emergency responders during emergency operations. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The California Fire Code regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The California Fire Code and the California Building Code use a hazard classification system to determine what protective measures are required to ensure fire safety and protect lives.

These measures may include construction standards, separations from property lines, and specialized equipment. To ensure these safety measures are met, the California Fire Code employs a permit system based on hazard classification. The provisions of this code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout California.

More specifically, California Fire Code (Part 9) Chapter 7 addresses fire-resistances-rated construction; California Building Code (Part 2) Chapter 7A addresses materials and construction methods for exterior wildfire exposure; California Fire Code Chapter 8 addresses fire-related interior finishes; California Fire Code Chapter 9 addresses fire protection systems; and California Fire Code Chapter 10 addresses fire-related means of egress, including fire apparatus access road width requirements. California Fire Code Section 4906 also contains regulations for vegetation and fuel management to maintain clearances around structures as well as design criteria for specific types of fire-resistant and non-fire-resistant vegetation. These requirements establish minimum standards to protect buildings in Fire Hazard Severity Zones within State Responsibility Areas and wildland-urban interface fire areas. This code includes provisions for ignition-resistant construction standards for new buildings.

California Fire Code Chapter 33, Fire Safety During Construction and Demolition, also includes requirements for a construction pre-fire plan, training, fire protection devices, regulations for refueling, fire clearances, precautions against fire (including prohibitions on smoking), on-site firewatch, and regulations for welding and electrical wiring.

California Public Resources Code

The California Public Resources Code (PRC) includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction

equipment that use an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas. These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines must be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC Section 4442)
- Appropriate fire suppression equipment must be maintained during the highest fire danger period, from April 1 to December 1 (PRC Section 4428)
- On days when a burning permit is required, flammable materials must be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor must maintain the appropriate fire suppression equipment (PRC Section 4427)
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines must not be used within 25 feet of any flammable materials (PRC Section 4431)

California Occupational Safety and Health Administration

In accordance with CCR Title 8, Section 1270, *Fire Prevention*, and Section 6773, *Fire Protection and Fire Equipment*, the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance and use of all firefighting and emergency medical equipment.

California Code of Regulations, Title 5

The California Code of Regulations, Title 5 Education Code, governs all aspects of education in the State. California State Assembly Bill (AB) 2926 – School Facilities Act of 1986 – was enacted by the State of California in 1986 and added to the California Government Code (Section 65995). It authorizes school districts to collect development fees, based on demonstrated need, and generate revenue for school districts for capital acquisitions and improvements. It also established that the maximum fees which may be collected in accordance with this and any other school fee authorization are $1.50 per square foot for residential development and $0.25 per square foot for commercial and industrial development.

AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the Government code. In accordance with this statute, payment of statutory fees by developers serves as total mitigation in accordance with CEQA to satisfy the impact of development on school facilities. However, subsequent legislative actions have alternatively expanded and contracted the limits placed on school fees by AB 2926.

Leroy F. Greene School Facilities Act of 1998 – Senate Bill 50

As part of the further refinement of the legislation enacted in accordance with AB 2926, the passage of SB 50 in 1998 defined the Needs Analysis process in government Code Sections 65995.5-65998. In accordance with the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. SB 50 generally provides for a 50/50 State and local school facilities match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available; whether the school district is eligible

for State funding; and whether the school district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use.

California Government Code sections 65995-65998 set forth provisions to implement SB 50. Specifically, in accordance with section 65995(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization…on the provision of adequate school facilities." The school district is responsible for implementing the specific methods for mitigating school impacts in accordance with the Government Code.

Pursuant to Government Code section 65995(i), "A State or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in section 56021 or 56073 on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized pursuant to this section or pursuant to section 65995.5 or 65995.7, as applicable."

California Education Code section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. GUSD has developed an impact fee schedule with requires a payment of $0.39 per square foot of commercial and industrial development (GUSD 2022). SBUSD has set impact fees of $0.78 per square foot for commercial developers (SBUSD 2022).

c. Local Regulations

Santa Barbara County Fire Department Development Standards

SBCFD sets development standards which a project must implement into its design. These include standards for defensible space, adequate emergency access, adequate fire hydrants, adequate building access, adequate interior fire sprinkler systems, adequate emergency alarm system, and approved locking systems for gated access, among other development standards.

City of Goleta General Plan/Coastal Land Use Plan

The City's General Plan/Coastal Land Use Plan Public Facilities Element provides policies which set standards for fire and police protection. Public Facilities Element Policy PF 3.1 identifies three standards with respect to fire protection services, which are derived from the guidelines of the National Fire Protection Association and the SBCFD. These standards include (City of Goleta 2006a):

- A firefighter-to-population ratio of one firefighter on duty 24 hours a day for every 2,000 persons is the ideal goal, however, one firefighter for every 4,000 persons is the absolute maximum population that can be adequately served;
- A ratio of one engine company per 16,000 persons, assuming four firefighters per station, represents the maximum population that the SBCFD determined can be adequately served by a four-person crew; and
- A five-minute response time in urban areas

Public Facilities Element Policy PF 3.6 identifies the City's police service standards. The standards are as follows (City of Goleta 2006a):

- An average emergency response time of 5 minutes.
- An average nonemergency response time of 20 minutes.

In addition, the City's General Plan/Coastal Land Use Plan Public Facilities Element contains policies regarding the adequacy of public services to serve new developments. These policies are identified below:

- **PF 3.8 Impact Fee for Police Facilities.** The City shall continue to require a development impact fee to provide revenue to assist with funding capital facilities for police services.
- **PF 3.9 Safety Considerations in New Development.** All proposals for new or substantially remodeled development shall be reviewed for potential demand for and impacts on safety and demand for police services. The design of streets and buildings should reinforce secure, safe, and crime-free environments. Safety and crime reduction or prevention, as well as ease of policing, shall be a consideration in the siting and design of all new development within the city.
- **PF 5.7 School Impact Fees.** Where school districts have adopted development impact fees to help finance provision of facilities, the City shall provide information regarding these impact fees to developers and builders. The City shall not issue a building permit for any development subject to such fees without documentation from the applicable district that its fees have been paid. The developer or builder shall be responsible for providing documentation to the City that school impact fees have been paid.
- **PF 9.3 Responsibilities of Developers.** Construction permits shall not be granted until the developer provides for the installation and/or financing of needed public facilities. If adequate facilities are currently unavailable and public funds are not committed to provide such facilities, the burden shall be on the developer to arrange appropriate financing or provide such facilities in order to develop. Developers shall provide or pay for the costs of generating technical information as to impacts the proposed development will have on public facilities and services. The City shall require new development to finance the facilities needed to support the development wherever a direct connection or nexus of benefit or impact can be demonstrated.
- **PF 10.2 Development Impact Fees.** The City shall adopt and maintain a development impact fee program that requires new development to pay a proportionate share of the costs of new or upgraded capital facilities attributable to new development. Impact fee programs for capital facilities shall include sufficient funding for all of the following:
  a. Design and engineering.
  b. Environmental compliance and permitting.
  c. Land acquisition and/or right-of-way acquisition.
  d. Site preparation, including grading and installation of utilities, drainage, and other necessary infrastructure.
  e. Construction of the public facility.
  f. Parking, landscaping, and street trees, where applicable.
  g. Necessary off-site improvements, such as sidewalks, extensions of utilities, and others as applicable.

The impact fee program shall be reviewed regularly to ensure that sufficient funding will be available to construct all required facilities.

City of Goleta Municipal Code

Section 35-174.7 of Goleta's Coastal Zoning Ordinance states a development plan shall only be approved if the finding is made that there are adequate public services, including, but not limited to fire protection, and police protection, to serve a proposed development.

4.12.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

To assess the proposed project's potential impacts to public services, the analysis examines the potential impact to public services that would result from the on-site uses of the proposed industrial building and the indirect population growth which could as a result of the employment needed to serve the proposed project.

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on public services. Would the project:

1. 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 the public services
    i. Fire protection;
    ii. Police protection;
    iii. Schools;
    iv. Parks;
    v. Other public facilities.

The significance thresholds and potential impacts to parks are described in Section 4.15.4, *Parks and Recreation*, in Section 4.15, *Effects Found Not to Be Significant*, and are not discussed further in this section.

The County's 2021 *Environmental Thresholds and Guidelines Manual* (2021; refer to Section 4.0, *Environmental Impact Analysis*) includes thresholds of significance for potential impacts on schools. In accordance with these thresholds, any project that would generate enough students to generate the need for an additional classroom based on the lowest student per classroom loading standards of the State school building program would be considered to result in a significant impact on schools. The *Environmental Thresholds and Guidelines Manual* assumes the following standards for classroom size:

- Elementary: 29 students per classroom
- Junior High School/Middle School: 29 students per classroom
- High School: 28 students per classroom

b. Project Impacts and Mitigation Measures

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

Impact PS-1 THE ADDITIONAL EMPLOYMENT REQUIRED FOR THE PROPOSED PROJECT COULD RESULT IN INDIRECT POPULATION GROWTH. HOWEVER, THE POTENTIAL INDIRECT POPULATION GROWTH WOULD NOT INCREASE THE DEMAND FOR FIRE SERVICES SUCH THAT NEW OR PHYSICALLY ALTERED FACILITIES WOULD BE NEEDED TO ADEQUATELY MAINTAIN SERVICE RATIOS. THE PROJECT SITE'S PROXIMITY TO EXISTING FACILITIES WOULD NOT NECESSITATE THE PROVISION OF NEW OR PHYSICALLY ALTERED FIRE PROTECTION FACILITIES. HOWEVER, THE PROPOSED PROJECT WOULD BE REQUIRED TO PAY DEVELOPER FEES, INCLUDING FEES FOR EMERGENCY SERVICES. WITH PAYMENT OF THE REQUIRED FEES, THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The proposed project would not directly result in population growth because the proposed project does not include residential uses. The proposed project would result in approximately 75 additional employees which could cause indirect growth; however, because these jobs would likely come from the local workforce it is not expected that people would be required to relocate to Goleta in order to take one of the 75 new jobs. In a conservative scenario wherein all projected employees and their families were to relocate to Goleta, there would be a population growth of 198 based on the city's average persons per household of 2.64 (California Department of Finance [DOF] 2022). With approximately 214 firefighters, SBCFD provides a ratio of approximately 2.77 firefighters per 2,000 persons within its service population, which is above the City goal of one firefighter on duty 24 hours a day for every 2,000 persons (SBCFD 2023a). The addition of 198 people to Goleta would maintain the existing SBCFD ratio of approximately 2.77 firefighters per 2,000 persons and thus not substantially diminish fire protection services such that new fire protection facilities would be needed.

Furthermore, the project site is located approximately 1.3 miles from the County Station 12 and thus firefighters would be able to readily respond to the demand for fire services at the project site. The proposed project would be constructed in accordance with the requirements of the California Fire Code which would reduce the potential for fire to occur at the project site, thereby reducing the potential demand for fire services at the project site. Fire safety measures and equipment required by the California Fire Code, which would be incorporated into the project design, include use of fire-retardant building materials, inclusion of emergency water infrastructure (fire hydrants and sprinkler systems), and installation of smoke detectors and fire extinguishers. The planned Fire Station 10, which has already undergone environmental review, would address existing service levels for fire protection facilities in Goleta and would help the SBCFD achieve their goal of 1 firefighter per 2,000 residents. Thus, the addition of the proposed project within the SBCFD service area would not result in substantial deficiencies to fire protection services. In addition, pursuant to Policies PF 9.3 and PF 10.2 of the Goleta General Plan/Coastal Land Use Plan, the project applicant would be required to pay development impact fees which would provide funding for expanded fire protection facilities, including environmental compliance and permitting for new facilities. With payment of the required

fees, the proposed project would not substantially increase the need for new or physically altered fire protection facilities, the construction of which could result in significant environmental impacts and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

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

Impact PS-2 THE ADDITIONAL EMPLOYMENT REQUIRED FOR THE PROPOSED PROJECT COULD RESULT IN INDIRECT POPULATION GROWTH. HOWEVER, THE POTENTIAL INDIRECT POPULATION GROWTH WOULD NOT INCREASE THE DEMAND FOR POLICE SERVICES SUCH THAT THE PROPOSED PROJECT WOULD CREATE A NEED FOR NEW OR PHYSICALLY ALTERED POLICE PROTECTION FACILITIES. HOWEVER, THE PROPOSED PROJECT WOULD BE REQUIRED TO PAY DEVELOPER FEES, INCLUDING FEES FOR EMERGENCY SERVICES. WITH PAYMENT OF THE REQUIRED FEES, THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

As stated in 4.12.1(b), *Police Protection*, the City currently is provided with patrol time equivalent to three Deputy Service Units, which is deemed adequate for the City (Rivas 2023). The proposed project would result in approximately 75 additional employees which could cause indirect growth; however, because these jobs would likely come from the local workforce and it is not expected that people would be required to relocate to Goleta. In a conservative scenario wherein all projected employees and their families were to relocate to Goleta, there would be a population growth of 198 based on the city's average persons per household of 2.64 (DOF 2022). This population growth represents less than one percent of Goleta's existing population which is not anticipated to substantially alter the existing service ratios provided by the contracted Deputy Service Units such that an additional officer would be required in order to provide adequate public services (Rivas 2023). Thus, the proposed project would not be expected to result in substantial additional police services or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts. Regardless, pursuant to Policies PF 3.8 and PF 10.2 of the Goleta General Plan/Coastal Land Use Plan, the proposed project applicant would be required to pay development impact fees to provide revenue to assist with funding future capital facilities for police services or increased law enforcement personnel. With payment of the required fees, the proposed project would have a less than significant impact on police protection services.

Mitigation Measures

No mitigation measures are required.

Threshold 1(iii):	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Impact PS-3 THE ADDITIONAL EMPLOYMENT REQUIRED FOR THE PROPOSED PROJECT COULD INDIRECTLY INCREASE THE STUDENT POPULATION OF GOLETA UNIFIED SCHOOL DISTRICT AND/OR SANTA BARBARA UNIFIED SCHOOL DISTRICT. HOWEVER, THE PROPOSED PROJECT WOULD BE REQUIRED TO PAY DEVELOPER FEES, INCLUDING SCHOOL FEES. WITH PAYMENT OF THE REQUIRED FEES, THE PROPOSED PROJECTS IMPACTS TO SCHOOLS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The proposed project would not directly generate population growth that would increase the amount of school-aged children in the GUSD or SBUSD because the proposed project does not include residential uses. The addition of approximately 75 employees may result in additional school-aged children in GUSD or SBUSD if employees and their families move to the service area of GUSD and/or SBUSD. In a conservative scenario wherein all projected employees and their families were to relocate to Goleta, there would be a population growth of 198 which would require approximately 75 residential units based on the City's average persons per household of 2.64 (DOF 2022). Using a student generation factor of 0.2 students per residential unit per school district, consistent with the City's General Plan/Coastal Land Use Plan Final EIR, the proposed project could generate approximately 15 students in GUSD and 15 students in SBUSD from indirect population growth (City of Goleta 2006b). Table 4.12-1 shows the projected enrollment increases attributable to the proposed project in comparison to existing capacities of GUSD and SBUSD school facilities.

Table 4.12-1 Proposed Project Induced Student Generation at GUSD and SBUSD Schools

District	Enrollment[1]	Capacity[1]	Currently Exceeds Capacity	Proposed Project-Generated Students	Exceeds Capacity with Proposed Project?
GUSD[2]	1,613	2,178	No	15	No
SBUSD	2,772	3,861	No	15	No

[1] The enrollment and capacity values correspond to the total enrollment and capacity of GUSD and SBUSD schools in Goleta. The enrollment and capacity values are presented as such because determining the exact school which a student generated via indirect population growth from the proposed project would attend is speculative.

[2] GUSD enrollment and capacity values do not include Fairview Preschool, which is a special education school.

Source: California Department of Education 2023c-2023j; GUSD 2020

As shown in Table 4.12-1, the proposed project would not induce indirect population growth such that the existing capacities of school facilities would be exceeded. The proposed project would be required to pay state-mandated developer fees to fund the construction of school facilities to accommodate students generated from new development projects. Pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees pursuant to California Education Code 17620 "…is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." With payment of school fees, the proposed project would have a less than significant impact on schools.

Mitigation Measures

No mitigation measures are required.

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

Impact PS-4 THE ADDITIONAL EMPLOYMENT REQUIRED FOR THE PROPOSED PROJECT COULD RESULT IN INDIRECT POPULATION GROWTH. HOWEVER, THE PROPOSED PROJECT WOULD NOT INDUCE SUBSTANTIAL POPULATION GROWTH SUCH THAT NEW OR PHYSICALLY ALTERED LIBRARIES WOULD BE REQUIRED. THEREFORE, THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The proposed project would not directly induce direct population growth, and the proposed project's potential to indirectly result in population growth of approximately 198 people would not place substantial additional demand on library services or inhibit the ability for the Goleta Valley Library to maintain material circulation. The existing library facility would be sufficient to accommodate the potential incrementally increased use and circulation needs that may result from indirect population growth due to the proposed project. Furthermore, the proposed project applicant would pay development impact fees consistent with Policy PF 10.2 of the Goleta General Plan/Coastal Land Use Plan which would fund the provision of new or expanded libraries. Therefore, the proposed project's impact on the need for new or physically altered libraries would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.12.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts that would occur from impacts of reasonably anticipated projects identified in Table 3-1 of Section 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this EIR is discussed in Section 3, *Environmental Setting*.

Cumulative projects include construction of a total of 469 residential units which would result in an additional 1,238 people based on the city's average persons per household of 2.64 (DOF 2022). With approximately 214 firefighters, SBCFD would provide a ratio of approximately 2.75 firefighters per 2,000 persons within its service population which is above the City goal of one firefighter on duty 24 hours a day for every 2,000 persons. The City has accounted for cumulative growth within the Goleta General Plan/Coastal Land Use Plan which informs the potential need for expansion of fire services within the City. Pursuant to Policy PF 10.2 of the Goleta General Plan/Coastal Land Use Plan, cumulative development would be required to pay development impact fees which would provide funding for expanded fire protection facilities to accommodate new residents, including environmental compliance and permitting for new facilities. Development of the planned Fire Station 10 is intended to address fire service deficiencies in western Goleta. A Final Environmental Impact Report of Fire Station 10 was prepared and certified by City Council in December 2018 and obtained California Coastal Commission approval in September 2020. Once constructed, Fire Station 10 would reduce the demands for fire protection services experienced by existing fire stations in Goleta. Potential indirect population growth that could result from development of the proposed project is

approximately 16 percent of the potential growth that would occur from cumulative development and as such would have a minimal contribution to a reduction in fire service ratios. Development of the proposed project would not cause fire protection service ratios to reach unacceptable levels, and the proposed project would adhere to California Fire Code standards which would reduce the potential for a fire to occur and thereby reduce the potential demand for fire protection services. Similar to cumulative development, the proposed project would pay development impact fees pursuant to Policy PF 10.2 of the Goleta General Plan/Coastal Land Use Plan. Therefore, cumulative impacts related to new or physically altered fire protection facilities would be less than significant, and the proposed project would not have a cumulatively considerable contribution related to fire protection facilities.

Cumulative development would result in additional residents, commercial, and industrial development which would increase the demand for police services in Goleta. Increased demands may require additional Deputy Service Units, which eventually may result in the need for new or expanded police stations in Goleta. Cumulative development would be required pay development impact fees which would provide funding for expanded police stations. At the time which the City determines a new or expanded police station is needed, the potential environmental impacts of developing a police station would be evaluated and mitigated as necessary as part of project-specific environmental review. Because the location, timing, and features of a new police station are not currently known, any environmental impact analysis of a new station would be speculative at this time. The proposed project may result in up to 198 additional residents in Goleta. This population increase is not anticipated to necessitate additional officers to meet additional demands. Furthermore, if an additional officer is needed, it is not anticipated the addition of one officer would necessitate the construction of a new or expanded police station. Therefore, the proposed project would not have a cumulatively considerable contribution related to police protection facilities.

The need for school services in Goleta would increase in association with the anticipated population increase from cumulative development. Cumulative projects include construction of a total of 469 residential units which would result in an additional 1,238 people based on the city's average persons per household of 2.64 (DOF 2022). Based on a generation factor of 0.2 students per residential unit per school district, cumulative development could generate 247 new students dependent on GUSD schools and 247 new students dependent on SBUSD schools. The additional students generated by cumulative development in combination with potential additional studies indirectly generated by the proposed project would not exceed the capacities of GSUD and SBUSD schools in Goleta (refer to Table 4.12-1). In addition, cumulative development and the proposed project would be required to pay developer impact fees pursuant to California Education Code 17620 and SB 50 to mitigate impacts to school facilities. Therefore, cumulative impacts related to new or physically altered school facilities would be less than significant, and the proposed project would not have a cumulatively considerable contribution related to school facilities.

The demand for library services in Goleta would increase in association with the anticipated population increase of 1,232 people from cumulative development. There are currently no specific plans for a new library in the City. Development impact mitigation fees assessed on cumulative development would be used to develop additional libraries as needed, subject to City discretion. At the time new or expanded library facilities are proposed, these facilities would be subject to project-specific environmental review and all applicable federal, State, and local regulations that would reduce environmental impacts associated with facility development or expansion. The potential indirect population growth that could occur as a result of the proposed project is approximately 16 percent of cumulative population growth and would not place substantial additional demand on

library services or inhibit the ability for the Goleta Valley Library to maintain material circulation. Therefore, cumulative impacts related to new or physically altered libraries would be less than significant, and the proposed project would not have a cumulatively considerable contribution on impacts to new or physically altered libraries.

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4.13 Transportation and Circulation

This section analyzes impacts to the local transportation and circulation system, including long-term impacts associated with operation of the proposed project. The analysis is based, in part, on the *Updated Traffic and Circulation Study* (Traffic Study) prepared by Associated Transportation Engineers in July 2024 (Appendix B).

4.13.1 Environmental Setting

a. Existing Transportation System

The existing transportation system is comprised of highways, arterial roadways, collector streets, and associated bicycle and pedestrian facilities. Roadway descriptions and the existing transportation system are discussed in greater detail below.

Regional Access

Regional access to the project site is provided by United States Route 101 (U.S. 101) and State Route (SR) 217, which are detailed below.

United States Route 101

U.S. 101 is located approximately 0.90-mile north of the project site. U.S. 101 is a multi-lane interstate freeway serving the pacific coast. U.S. 101 is the primary route between the Goleta area and the adjacent cities of Santa Barbara, Carpinteria, Ventura, Buellton, and Santa Maria. Access to U.S. 101 from the project site is provided via the U.S. 101/Fairview Avenue interchange to the northwest of the project site and the SR 217/Hollister Avenue interchange to the northeast.

State Route 217

SR 217 is located approximately 175 feet east of the project site. SR 217 is a four-lane freeway that connects U.S. 101 to the north to the University of California, Santa Barbara campus to the southwest. SR 217 includes a full-access interchange at Hollister Avenue. The SR 217/Hollister Avenue interchanges provides access to U.S. 101.

Local Access

Local access to the project site is provided by arterial roadways and collector streets. Arterial roadways carry through traffic and connect to the state highway system and are designed to have the highest traffic carrying capacity in the local roadway system. Collector streets serve as intermediate routes to handle traffic between local streets and streets of higher classification, such as arterial roadways. Descriptions of streets providing local access to the project site are provided below.

Hollister Avenue

Hollister Avenue, located approximately 0.60-mile north of the project site, is a four-lane east-west arterial roadway that extends through the Goleta Valley area from SR 154 on the east to Calle Real on the west. Hollister Avenue is the primary east-west surface street in the Goleta Old Town area.

Fairview Avenue

Fairview Avenue, located approximately 0.25-mile west of the project site, is a two- and four-lane north-south arterial roadway. North of Hollister Avenue, Fairview Avenue extends as a four-lane roadway that connects to the U.S. 101 interchange and Calle Real north of U.S. 101. Fairview Avenue extends south of Hollister Avenue to its end at Fowler Road. The U.S. 101/Fairview Avenue interchange provides regional access to the project site.

Pine Avenue

Pine Avenue, located approximately 0.25-mile north of the project site, is a two-lane collector road that extends south from Hollister Avenue and connects to Thornwood Drive.

South Kellogg Avenue

South Kellogg Avenue, which connects to the access road on the project site, is a two-lane collector road that extends north and south of Hollister Avenue. The two-lane roadway provides direct access to the project site via the existing access road and private driveway connection.

Thornwood Drive

Thornwood Drive, located approximately 0.10-mile north of the project site, is a two-lane road which connects to Pine Avenue and South Kellogg Avenue.

Ekwill Street

Ekwill Street, located approximately 0.38-mile northeast of the project site, is a two-lane road that extends for a short distance west of South Kellogg Avenue. This segment was constructed as part of the Old Town Village Mixed Use Project. The remaining portions of the Ekwill Street extension are under construction.

Bicycle and Pedestrian Facilities

Bicycle facilities consist of Class I, II, and III bikeways. Class I shared-use paths or bike paths are facilities with right-of-way separated from roadways. Class II bike lanes provide a striped lane for one-way bicycle travel on the side of the street adjacent to vehicle traffic. Class III bike routes consist of a roadway that is shared between bicycle and vehicle traffic with supplemental bike signage. The following bike lanes are located in proximity to the project site (City of Goleta 2023):

- **Class II** on both sides of Hollister Avenue
- **Class II** on both sides of Fairview Avenue
- **Class II** on both sides of Ward Drive
- **Class III** on both sides of South Kellogg Avenue

Pedestrian facilities include sidewalks, crosswalks, multi-use paths, and pedestrian signals at signalized intersections. Pedestrian facilities which provide access to the project site include sidewalks on streets located in the adjacent industrial development to the north.

Transit Facilities

The Santa Barbara Metropolitan Transit District (MTD) provides local bus service for the region. The nearest bus stops to the project site are located on Hollister Avenue at its intersection with South

Kellogg Avenue approximately 0.6-mile northeast. The bus stops are served by MTD Lines 6, 7, and 12x. Data published on the MTD website indicate from July 2022 to September 2022, Line 6 carried approximately 25.6 passengers per operating hour Line 7 carried approximately 14.4 passengers per operating hour, and Line 12x carried approximately 20.2 passengers per operating hour. From July 2022 to September 2022, Line 6 experienced 22 "at capacity" loads, Line 7 experienced six "at capacity" loads, and Line 12x experienced 12 "at capacity" loads. During the same time period, Line 6 experienced nine "too full to board" loads, Line 7 experienced one "too full to board" load, and Line 12x experienced 29 "too full to board" loads (Santa Barbara MTD 2022).

4.13.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations related to transportation and circulation that are applicable to the proposed project.

b. State Regulations

California Department of Transportation

The California Department of Transportation (Caltrans) is responsible for the planning, design, construction and maintenance of all interstate freeways and state routes, including SR 217 and U.S. 101. Caltrans builds, maintains, and operates the State Highway System in California with a goal to facilitate the safe and efficient use of the state transportation system for all users. Caltrans sets standards in its 2020 Transportation Impact Study Guide that focus on the vehicle miles traveled (VMT) metric. The document is intended to be a reference and informational document that aligns with the standards and thresholds established in the Governor's Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA. This document is available to be used by local governments to uniformly review transportation analysis and assess the operational standards of Caltrans-maintained facilities. The 2020 Transportation Impact Study Guide acts as a replacement for the 2002 Guide for the Preparation of Traffic Impact Studies but is only intended to be used with local land use projects and plans, not to be used for transportation projects on the State Highway System.

Senate Bill 743

Senate Bill (SB) 743, which was signed into law in 2013, directed OPR to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics instead of traffic level of service (LOS). SB 743 requires the new criteria to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also states that alternative measures of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." SB 743 changes the way that public agencies evaluate the transportation impacts of projects in accordance with CEQA by recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (see Pub. Resource Code, § 21099, subd. [b][2]).

On January 20, 2016, OPR released the Revi*sed Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines

Implementing SB 743, which had been released on August 6, 2014. Of note was the updated text of the proposed new CEQA Guidelines Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines, and the updated guidelines became effective on December 28, 2018 (OPR 2018).

c. Local Regulations

Santa Barbara County Association of Governments Connected 2050 Regional Transportation Plan and Sustainable Communities Strategy

The Santa Barbara Association of Governments (SBCAG) is required by State and federal law to prepare, update, and adopt a Regional Transportation Plan (RTP) every four years. RTPs must be developed consistent with a Sustainable Communities Strategy (SCS) which focuses on aligning transportation, housing, and land use decisions toward achieving greenhouse gas emissions reduction targets set by the California Air Resources Board. Together, this document is referred to as a Regional Transportation Plan-Sustainable Communities Strategy (RTP-SCS). The most recent update to the RTP-SCS was completed by SBCAG in 2021 and sets forth long-range transportation planning goal describing how the region will meet its transportation needs for the 30-year period from 2020 to 2050. The 2050 RTP-SCS analyzes the transportation needs of the region into the future and identifies project priorities in order to improve the transportation system. The 2050 RTP-SCS uses existing and future land use patterns and forecasted population and job growth to identify and prioritize transportation projects for all modes of transportation including highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as transportation demand management measures and intelligent transportation systems (SBCAG 2021).

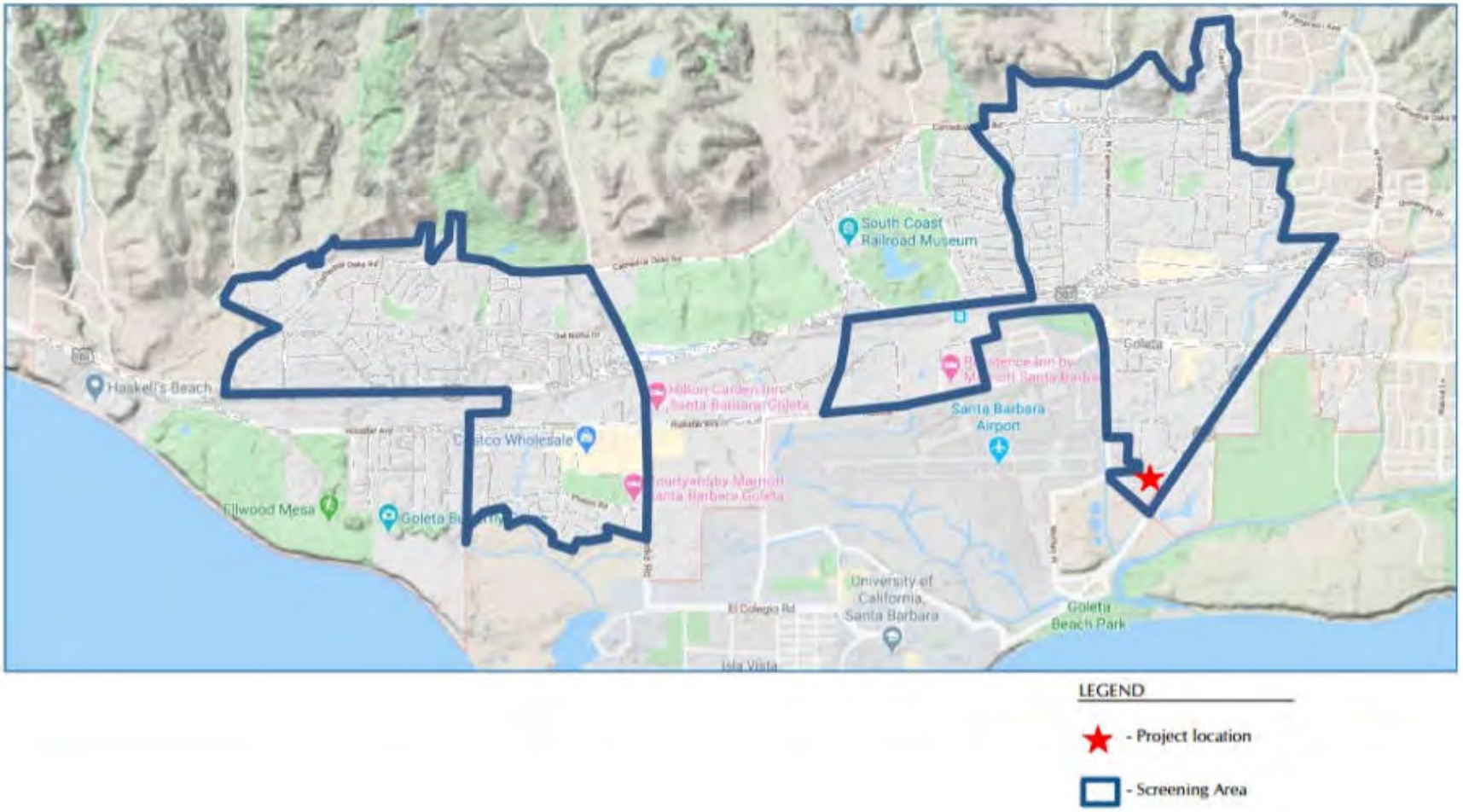
City of Goleta VMT Thresholds Study

On July 7, 2020, pursuant to the requirements of SB 743, the City adopted the *Guidelines for the Implementation of the Provisions of Vehicle Miles Traveled, including Vehicle Miles Traveled Thresholds of Significance* (Resolution 20-44). Consistent with the recommendations of OPR, the City's VMT Guidelines establishes screening criteria for certain projects that are exempt from performing a detailed VMT analysis and may be presumed to have a less than significant VMT impact as follows (Appendix B):

> Residential and work-based projects that are located in areas with existing low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Therefore, these projects can be presumed to have a less-than-significant VMT impact without the need to conduct a VMT analysis. The areas where projects would be presumed to have a less-than-significant VMT impact are depicted in Figure 3.1 for work-based projects and Figure 3.2 for residential projects. These indicate where residential and work-based projects would generate an average VMT of 15% or less below the baselines and would not require a VMT analysis. It's important to emphasize that if a project is not presumed to be less than significant based on these screening maps, it does not necessarily mean that the project will have a VMT impact, only that a less than significant impact cannot be assumed and that a VMT analysis would be necessary to make that determination.

The screening area for work-based projects is shown in Figure 4.13-1.

Figure 4.13-1 VMT Screening Area for Work-Based Projects



City of Goleta General Plan

The City's General Plan Transportation Element is intended to guide the continued development and improvement of the transportation system to support land uses planned in the City's Land Use Element. Polices applicable to the proposed project include the following (City of Goleta 2006):

- **TE 1.6: Development Review.** As a condition of approval of new non-residential projects, the City may require developers to provide improvements that will reduce the use of single-occupancy vehicles. These improvements may include, but are not limited to, the following:
  - Preferential parking spaces for carpools.
  - Bicycle storage, parking spaces, and shower facilities for employees.
  - Bus turnouts and shelters at bus stops.
  - Other improvements as may be appropriate to the site.
- **TE 2.3: Diversion of Automobile Trips to Alternative Modes.** The City encourages investment in alternative modes of travel that will make those modes more competitive with auto travel in terms of convenience, accessibility, costs, and safety. These may include, but are not limited to, improvements in the bus transit system, the bikeway system, pedestrian circulation system, and potentially commuter rail services, if the region should determine to pursue this option.
- **TE 6.7: Widths of Paved Surfaces.** New rights of way and access easements should be paved to the smallest dimension necessary to accommodate their designed function (including emergency access) and to maintain the character of the neighborhood.
- **TE 9.2: Adequacy of Parking Supply in Proposed Development.** The City shall require all proposed new development and changes/intensifications in use of existing nonresidential structures to provide a sufficient number of off-street parking spaces to accommodate the parking demand generated by the proposed use(s), and to avoid spillover of parking onto neighboring properties and streets.
- **TE 9.4: Parking within Commercial and Industrial Areas.** The following standards shall apply to parking within nonresidential areas:
  - An adequate number and appropriate type of parking spaces shall be provided on site for new development or changes of use in commercial, business park, and other industrial areas.
  - Supplemental satellite parking facilities are encouraged for large employers to prevent spillover parking into neighboring areas.
  - In determining the adequacy of proposed parking for new or substantially modified development, the City may consider proximity to transit facilities and the provisions of a Transportation Management Plan (TMP) where it is demonstrated that the plan's measures will sufficiently reduce the demand for onsite parking.
  - Conditions of approval for large nonresidential projects may include a requirement to prepare a TMP that includes monitoring of parking lot utilization and measures that will be implemented if the event that the supply of onsite parking spaces is inadequate.
  - Provision of large amounts of excess parking is discouraged, except that surplus landscaped areas may be identified and reserved for future expansion of parking areas if warranted by future conditions.
  - Compact parking spaces and 90-degree parking stalls are discouraged in parking lots serving high-turnover uses, such as (but not limited to) retail commercial centers.

- **TE 10.4: Pedestrian Facilities in New Development.** Proposals for new development or substantial alterations of existing development shall be required to include pedestrian linkages and standard frontage improvements. These improvements may include construction of sidewalks and other pedestrian paths, provision of benches, public art, informational signage, appropriate landscaping, and lighting. In planning new subdivisions or large-scale development, pedestrian connections should be provided through subdivisions and cul-de-sacs to interconnect with adjacent areas. Dedications of public access easements shall be required where appropriate.
- **TE 11.4: Facilities in New Development.** Bicycle facilities such as lockers, secure enclosed parking, and lighting shall be incorporated into the design of all new development to encourage bicycle travel and facilitate and encourage bicycle commuting. Showers and changing rooms should be incorporated into the design of all new development where feasible. Transportation improvements necessitated by new development should provide onsite connections to existing and proposed bikeways.

An analysis of the proposed project's consistency with applicable Transportation Element policies is provided in Section 4.10, *Land Use and Planning*.

City of Goleta Municipal Code

Division 6, Section 35-111 of the City's Municipal Code sets the required number of parking spaces for industrial development. Section 35-111 sets the following parking standards:

- **Research and Development, Manufacturing, and Processing**: One space per 1.5 employees, but in no case less than one space per 500 square feet of gross floor area.
- **Wholesaling, Warehousing, and Storage Facility:** One space per 1,000 square feet of gross floor area and one space per four employees.
- **Other Industrial Uses:** One space per four employees.

4.13.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

This project-specific analysis is based, in part, on the Traffic Study prepared by Associated Transportation Engineers in December 2023 (Appendix B).

Significance Thresholds

CEQA Guidelines Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on transportation and circulation. Would the project:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
4. Result in inadequate emergency access.

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. Therefore, the following analysis relies on the *CEQA Guidelines* Appendix G thresholds identified above. The methodology within the City's adopted *Guidelines for the Implementation of the Provisions of Vehicle Miles Traveled, including Vehicle Miles Traveled Thresholds of Significance* (Resolution 20-44) is utilized to assess potential impacts related to VMT.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH APPLICABLE TRANSPORTATION ELEMENT POLICIES AND WOULD NOT RESULT IN SUBSTANTIAL INTERFERENCE WITH EXISTING SANTA BARBARA METROPOLITAN TRANSIT DISTRICT OPERATIONS. THEREFORE, THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The proposed project does not propose elements that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The City's General Plan Transportation Element includes numerous policies applicable to the proposed project. As described in Section 4.10, *Land Use and Planning*, the proposed project would be consistent with applicable Transportation Element policies. The proposed project would not cause changes to the existing bicycle facilities on Hollister Avenue, Fairview Avenue, or Ward Drive. There is an existing sidewalk located on South Kellogg Avenue, and Class III bicycle lanes located on South Kellogg Avenue. Project site access would be provided via an existing driveway which connects to an access road. The project proposes to resurface the existing access road. The proposed project would also include installation of a sidewalk which would start at South Kellogg Avenue and extend to the proposed parking lot. Proposed project design features would be subject to review and approval by the City, which would ensure the proposed project would conform to the City's driveway access control and vision clearance standards and minimize potential vehicle to pedestrian and vehicle to cyclist conflicts in accordance with City standards.

The nearest bus stops to the project site are located on Hollister Avenue at its intersection with South Kellogg Avenue approximately 0.6 mile northeast. There are no public transit services in the immediate vicinity of the project site. The proposed project may generate an incremental increase in transit use due to the increase of approximately 75 employees; however, employees are anticipated to be residents of Goleta who are already within the service area of MTD. Therefore, the increase in employment would not add substantial employment opportunities such that the addition of employees would substantially interfere with Santa Barbara MTD operations.

Given the above considerations, the proposed project would have a less than significant impact on a program, plan, ordinance or policy that addresses the current circulation system including transit, roadway, bicycle, and pedestrian facilities.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2 THE PROJECT SITE IS LOCATED IN AN AREA IN WHICH WORK-BASED PROJECTS HAVE BEEN DETERMINED BY THE CITY TO HAVE A LESS THAN SIGNIFICANT IMPACT ON VEHICLE MILES TRAVELED. THEREFORE, THE PROPOSED PROJECT WOULD NOT CONFLICT WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT GUIDELINES SECTION 15064.3, SUBDIVISION (B), AND IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Construction of the proposed project would result in short-term, temporary vehicle trips to and from the project site during the construction period. These temporary vehicle trips would not result in long-term changes to VMT within Goleta; therefore, project construction VMT would not be inconsistent with *CEQA Guidelines* Section 15064.3(b). As described in 4.13.2, *Regulatory Setting*, the City has identified areas where operation of a project would be presumed to have a less than significant impact on increases in VMT. These areas, delineated by the City, are where residential and work-based projects would generate an average VMT of 15 percent or more below baseline levels and would not require a VMT analysis, consistent with OPR guidance. The City anticipates residential and work-based projects in these areas would generate low VMT because of the higher density of existing residential and commercial uses and increased transit access relative to other areas of the City. These features allow for shorter vehicle trip lengths and promote the use of alternative transportation in these areas. As shown in Figure 4.13-1, the project site is within the City's screening map boundaries for work-based projects where VMT impacts are presumed to be less than significant (Appendix B). Accordingly, the proposed project would have a less than significant impact on VMT and would not conflict with *CEQA Guidelines* Section 15064.3(b).

Mitigation Measures

No mitigation measures are required.

Threshold 3:	Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

Impact TRA-3 THE PROPOSED PROJECT WOULD BE REQUIRED TO COMPLY WITH THE SANTA BARBARA COUNTY FIRE DEPARTMENT STANDARDS AND THEREFORE WOULD NOT SUBSTANTIALLY INCREASE HAZARDS. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

During construction, equipment staging would occur on-site and construction personnel would park on-site, which would minimize the potential for construction related vehicles and equipment to create a circulation related hazard in the immediate area . Currently, delivery trucks would be able to enter the project site from South Kellogg Avenue, but would not be able to exit the project site to South Kellogg Avenue without driving into the oncoming traffic lane to South Kellogg Avenue. The Traffic Study recommends egress improvements to accommodate delivery trucks exiting the project site (Appendix B). As described in Section 2, *Project Description*, the proposed project design includes the widening of the eastern portion of the driveway in order to accommodate WB-62[1] delivery trucks exiting or entering the project site from South Kellogg Avenue to address this issue. Accordingly, the proposed project would be designed and constructed to accommodate WB-62 delivery truck turning

[1] A WB 62 delivery truck refers to a specific type of commercial vehicle commonly used for transporting goods. The term "WB 62" is a specification that provides information about the truck's size and dimensions. "WB", otherwise known as wheelbase, is the distance between the centers of the front and rear wheels. "62" refers to the specific length of the wheelbase in feet.

requirements. Furthermore, WB-62 delivery trucks would be expected to access the project site via South Kellogg Avenue, Hollister Avenue, and SR 217, all of which can accommodate a WB-62 delivery truck. The Santa Barbara County Fire Department and the City would review and approve the proposed project design, which would ensure the proposed project would not introduce features that would substantially increase hazards due to a geometric design feature. Operation of the proposed project would not introduce new incompatible uses, such as farm equipment, to roadways, and the proposed project's uses would be similar to existing adjacent industrial uses. Compliance with applicable development standards would ensure the proposed project's impacts to increased hazards would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 4: Would the project result in inadequate emergency access?

Impact TRA-4 THE PROPOSED PROJECT'S DESIGN WOULD BE REQUIRED TO COMPLY WITH THE SANTA BARBARA COUNTY FIRE DEPARTMENT STANDARDS AND THEREFORE WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT.*

During construction, equipment staging would occur on-site and construction personnel would park on-site, which would minimize the potential for construction related vehicles and equipment to result in inadequate emergency access in the immediate area. The proposed project would be required to be designed in accordance with applicable Santa Barbara County Fire Department standards, including those that address minimum driveway width, signage and addressing, fire hydrants, fire sprinklers, and emergency access. As discussed in Impact TRA-2, the project includes improvements to the driveway access width to accommodate WB-62 trucks, which would also improve access for emergency vehicles. The Santa Barbara County Fire Department and the City would review and approve the proposed project design, which would ensure the proposed project would provide adequate egress for emergency access. Compliance with applicable development standards would ensure the proposed project's impacts to inadequate emergency access would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.13.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts that would occur from impacts of reasonably anticipated projects identified in Table 3-1 of Section 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this EIR is discussed in Section 3, *Environmental Setting*.

Cumulative development in Goleta would be subject to the same circulation-related programs, plans, ordinances, and policies as the proposed project. Cumulative development would be required to demonstrate consistency with the City's Transportation Element which guides the continued development and improvement of the transportation system in Goleta. As with the proposed project, cumulative development would also include sufficient bicycle parking spaces in accordance with City requirements which would promote alternative transportation. As a result, cumulative development would not result in a significant impact to a program, plan, ordinance, or policy addressing the circulation system.

VMT impacts could occur from cumulative development if cumulative development would raise VMT in the City beyond established thresholds. Based on technical guidance from the OPR, if a project has a less than significant impact on VMT using an efficiency-based threshold (e.g., VMT per resident), the project would not contribute to a cumulative VMT impact (OPR 2018). The City's screening criteria is analogous to an efficiency-based threshold, and therefore applicable to evaluate cumulative VMT impacts. As discussed in Impact TRA-2, the proposed project's VMT impact is presumed to be less than significant based on the City's screening criteria because the project site is within the City's screening map boundaries for work-based projects where development is presumed to generate an average VMT of 15 percent or more below baseline levels. Therefore, the proposed project's contribution to cumulative VMT impacts would not be cumulatively considerable.

Transportation hazards and emergency access impacts are site-specific and would not be significantly affected by cumulative development. Therefore, cumulative impacts related to transportation hazards and emergency access would not occur.

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4.14 Tribal Cultural Resources

This section of the EIR analyzes the project's potential impacts related to tribal cultural resources. Tribal cultural resources are those resources identified by California Native American tribes in consultation with lead agencies during tribal consultation (also referred to as Assembly Bill [AB] 52 consultation). The background information and analysis in this section is partially based on the *Archaeological Resources Assessment* prepared for the project by Amec Foster Wheeler Environment & Infrastructure, Inc. in December 2017, as well as the results of the City's AB 52 consultation.

4.14.1 Environmental Setting

a. Regional Tribal Cultural Resources

The Santa Barbara region was historically occupied by the Chumash. The Chumash were a diverse population living in settlements along the California coast from Malibu Creek in the south to Estero Bay in the north, and from Tejon Pass, Lake Casitas and the Cuyama River inland to the islands of San Miguel, Santa Rosa, and Santa Cruz. The setting of the project site as it relates to tribal cultural resources is summarized below.

The Chumash spoke six closely related Chumashan languages, which have been divided into two broad groups—Northern Chumash (consisting only of Obispeño) and Southern Chumash (Purisimeño, Ineseño, Barbareño, Ventureño, and Island Chumash) (Mithun 2001:389). Groups neighboring the Chumash included the Salinan to the north, the Southern Valley Yokuts and Tataviam to the east, and the Gabrielino (Tongva) to the south.

Permanent Chumash villages included hemispherical dwellings arranged in close groups. Each Chumash village had a formal cemetery marked by tall painted poles, often with a defined entrance area (Gamble et al. 2001). Archaeological studies have identified separate sections for elite and common families within the cemetery grounds (King 1969).

The acorn was a dietary staple for the mainland Chumash, though its dominance varied by coastal or inland location. Chumash diet also included cattail roots, fruits and pads from cactus, and bulbs and tubers of plants such as amole (Miller 1988). On the coast, the wooden plank canoe (*tomol*) was employed in the pursuit of marine mammals and fish. The *tomol* not only facilitated marine resource procurement but also facilitated an active trade network maintained by frequent crossings between the mainland and the Channel Islands.

Chumash populations were decimated by the effects of European colonization and missionization. Traditional lifeways largely gave way to laborer jobs on ranches and farms in the Mexican and early American periods. At the time of first European contact in 1542, the Goleta area was occupied by a Native American group speaking a distinct dialect of the Chumash language. Historically, this group became known as the Barbareño Chumash (Landberg 1965); the name deriving from the Mission Santa Barbara under whose jurisdiction many local Chumash came after its founding in 1776. Today, the Santa Ynez Band of Chumash Indians is the only federally recognized Chumash tribe, though many people of Chumash descent continue to live throughout their traditional territory.

b. Native American Consultation

The City of Goleta sent AB 52 consultation request letters to local Native American contacts identified by the Native American Heritage Commission (NAHC) notifying them of the project on April 25, 2018 shortly after the project application was deemed complete in accordance with Government Code Section 65352. Native American tribes that were sent consultation letters include the Santa Ynez Band of Chumash Indians, the Barbareño/Ventureño Band of Mission Indians, and the Coastal Band of the Chumash Nation. In the letters, the City requested that the tribes respond within 30 days if they would like an opportunity to consult on the project. The City did not receive any requests for Native American consultation in 2018. In response to the Notice of Preparation released for the Project, the Santa Ynez Band of Chumash Indians requested consultation on May 18, 2023, five years after the formal consultation request was sent by the City. City of Goleta staff met with the Santa Ynez Band of Chumash Indians on July 24, 2023 to discuss the project, although this meeting was not required under AB 52 and does not constitute formal consultation. Additional information on the requirements of tribal consultation as it relates to the project is included in Section 4.14.2, *Regulatory Setting*, and Section 4.14.4, *Impact Analysis* below.

4.14.2 Regulatory Setting

a. Federal Regulations

American Indian Religious Freedom Act and Native American Graves and Repatriation Act

The American Indian Religious Freedom Act recognizes that Native American religious practices, sacred sites, and sacred objects have not been properly protected under other statutes. It establishes as national policy that traditional practices and beliefs, sites (including right of access), and the use of sacred objects shall be protected and preserved. Additionally, Native American remains are protected by the Native American Graves and Repatriation Act of 1990.

b. State Regulations

California Environmental Quality Act

Tribal cultural resources are defined in Public Resources Code §21074 as:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either: (a) included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register), or (b) included in a local register of historical resources.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant.

A cultural landscape that meets these criteria is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Archaeological resources may also be tribal cultural resources if they meet these criteria.

Assembly Bill 52 (AB 52)

As of July 1, 2015, California Assembly Bill 52 (AB 52, codified in Government Code Section 65352) was enacted and expands CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project that may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." According to the legislative intent for AB 52, "tribes may have knowledge about land and cultural resources that should be included in the environmental analysis for projects that may have a significant impact on those resources." Section 21074 of AB 52 also defines a new category of resources under CEQA called "tribal cultural resources." Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the CRHR or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource. See also PRC 21074 (a)(1)(A)-(B).

In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments and with respect to the interests and roles of project proponents, it is the intent of AB 52 to accomplish all of the following:

1) Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities.
2) Establish a new category of resources in CEQA called "tribal cultural resources" that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation.
3) Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible.
4) Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated (Because CEQA calls for a sufficient degree of analysis, tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources).
5) In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources early in the CEQA environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision-making body of the lead agency.
6) Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to CEQA.
7) Ensure that local and tribal governments, public agencies, and project proponents have information available early in CEQA environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources and to reduce the potential for delay and conflicts in the environmental review process.

8) Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources.
9) Establish that a substantial adverse change to a tribal cultural resource has a significant effect on the environment.

c. Local Regulations

Goleta General Plan

The City of Goleta's Open Space Element of the General Plan (2006) outlines several goals and policies related to the preservation of cultural resources, including tribal cultural resources. Policies that are relevant to the project include:

- **Policy OS 8.5: Mitigation.** If research and surface reconnaissance shows that the project area contains a resource of cultural significance that would be adversely impacted by proposed development and avoidance is infeasible, mitigation measures sensitive to the cultural beliefs of the affected population shall be required. Reasonable efforts to leave these resources in an undisturbed state through capping or covering resources with a soil layer prior to development shall be required. If data recovery through excavation is the only feasible mitigation, the City shall confer with the affected Native American nation or most-likely descendants, as well as agencies charged with the responsibility of preserving these resources and organizations having a professional or cultural interest, prior to the removal and disposition of any artifacts.

Please see Section 4.10, *Land Use and Planning*, for a comprehensive list of applicable goals and policies.

Goleta Coastal Zoning Ordinance

Section 35-65 of the City's previous Coastal Zoning Ordinance provides archaeological resource development standards for projects. According to Section 35-65, when archaeological or other cultural resources are located on the project site, projects should be designed to avoid impacts to such resources, implement mitigation if impacts are unavoidable, and engage in Native American consultation when projects may impact significant archeological or cultural resources.

Goleta Historic Preservation and Archaeological and Tribal Cultural Ordinance (Ordinance No. 22-05)

This ordinance, passed in April 2022, established regulations and processes associated with archaeological resources and tribal cultural resources. Chapter 17.43 (Archaeological and Tribal Cultural Resources) of the City's Municipal Code was established by this ordinance, excerpts from Chapter 17.43 that would potentially apply to the project are provided below.

Chapter 17.43.040 Development Standards

a. The following standards are applicable to all permits issued under this chapter:
    1. If unanticipated discovery of archaeological and/or tribal cultural resources occurs during earth-disturbing activities, earth-disturbing activities must be stopped immediately until a qualified archaeologist can evaluate the significance of the archaeological and/or tribal cultural resource pursuant to standards set forth in Council Resolution No. 08-40,

Environmental Thresholds and Guidelines Manual as amended, and local Chumash tribal representative(s) can evaluate the importance of the find.

2. If human remains are uncovered as a result of earth-disturbing activities, work must stop immediately and the Planning and Environmental Review Department must be contacted, and the applicant must follow the procedures identified by Public Resources Code Section 5097.98.
3. As applicable, recommendations identified in the Preliminary Archaeological Assessment, Phase 1 Report, or Extended Phase 1 Report and agreed upon by the City, must be implemented and printed on the approved building plans.

4.14.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

As described in 4.14.2, *Regulatory Setting*, AB 52 requires consultation with Native American tribes. The City of Goleta prepared and sent AB 52 notification letters on April 25, 2018. Letters were sent to the Santa Ynez Band of Chumash Indians, the Barbareño/Ventureño Band of Mission Indians, and the Coastal Band of the Chumash Nation. The City did not receive any requests for Native American consultation in 2018. In response to the Notice of Preparation released for the Project, the Santa Ynez Band of Chumash Indians requested consultation on May 18, 2023, five years after the formal consultation request was sent by the City. The following analysis is based on the results of the consultation process.

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. In accordance with Appendix G of the CEQA Guidelines, an impact to tribal cultural resources is considered significant if the project would:

1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
   a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
   b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

According to the County of Santa Barbara's 2021 *Environmental Thresholds and Guidelines* Manual (refer to Section 4.0, *Environmental Impact Analysis*), a project would have 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.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact TCR-1 CONSTRUCTION OF THE PROJECT WOULD INVOLVE GROUND DISTURBING ACTIVITIES SUCH AS GRADING AND SURFACE EXCAVATION. HOWEVER, NO TRIBAL CULTURAL RESOURCES HAVE BEEN IDENTIFIED ON THE PROJECT SITE AND THERE IS NO POTENTIAL FOR ARCHAEOLOGICAL RESOURCES TO OCCUR WITHIN THE PROJECT SITE. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Pursuant to the requirements of AB 52, the City conducted Native American consultation for the project to identify potential concerns or issues associated with Native American cultural resources within the project vicinity. As part of the AB 52 consultation process, the City sent AB 52 consultation request letters to the Santa Ynez Band of Chumash Indians, the Barbareño/Ventureño Band of Mission Indians, and the Coastal Band of the Chumash Nation on April 25, 2018, shortly after the project application was deemed complete. No requests for tribal consultation were received in 2018 in response to the AB 52 consultation request letters. Santa Ynez Band of Chumash Indians requested consultation on May 18, 2023 in response to the Notice of Preparation. City of Goleta staff and the Santa Ynez Band of Chumash Indians met on July 24, 2023 to discuss the project, although this meeting was not required under AB 52 and does not constitute formal consultation.

No cultural resources were identified on the project site as a result of the CHRIS records search for the project. No tribal cultural resources have been identified on the project site to date. The project site is primarily underlain by fill soils that reach approximately 4 feet in depth (Appendix G). As indicated by cross-sections of grading plans for the project, project construction would result in the excavation of less than 4 feet of fill for all project components, except for the bioretention basin and utility trench construction, which would involve excavation of no more than 5 feet of fill. Therefore, excavation and ground disturbance associated with construction of the proposed industrial building would primarily occur in previously disturbed and fill soils, rather than native soils where there is a potential for tribal cultural resources to exist. Although the Goleta-Santa Barbara region has a long history of Native American occupation, the *Archaeological Resources Assessment* completed for the project site determined there is very low potential for subsurface resources to exist within the project site. Therefore, the project would not cause a substantial adverse change to tribal cultural resources, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.14.4 Cumulative Impacts

The geographic scope for considering cumulative impacts to tribal cultural resources is based on the ethnographic use patterns of the project site and surrounding region. For the ethnographic period, the geographic extent includes the entire traditional Chumash territory. Development of past, present, and reasonably foreseeable future developments could cumulatively contribute to the erasure of Chumash tribal cultural resources from the landscape. However, compliance with the provisions of AB 52 would ensure that any known or potential tribal cultural resources are treated in consultation with local Native American groups. Compliance with AB 52, implementation of project-specific measures to protect tribal cultural resources on a case-by-case basis, and continued involvement by local Native American groups in regional planning would generally limit the destruction of tribal cultural resources such that cumulative impacts would be less than significant. Given that no tribal cultural resources have been identified on the project site, the project would not have a cumulatively considerable contribution to cumulative impacts associated with tribal cultural resources.

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4.15 Utilities and Service Systems

This section analyzes the proposed project's potential impacts to utilities and service systems, including water, wastewater, stormwater, electric power, natural gas, telecommunications facilities, and solid waste.

4.15.1 Environmental Setting

a. Water Supply

The Goleta Water District (GWD) is the water purveyor for the residents of Goleta. The GWD service area encompasses approximately 29,000 acres located in the South Coast portion of Santa Barbara County with its western border adjacent to El Captain State Park, its northern border along the foothills of the Santa Ynez Mountains and Los Padres National Forest, the city of Santa Barbara to the east, and the Pacific Ocean to the south. GWD provides water service to approximately 84,500 residents and includes Goleta, the University of California Santa Barbara, Santa Barbara Municipal Airport, as well as nearby unincorporated area of Santa Barbara County (GWD 2021).

In June 2021, GWD adopted the most recent iteration of their Urban Water Management Plan (UWMP). As discussed in the UWMP, GWD draws its existing water supplies from four primary sources: Lake Cachuma surface water, the State Water Project, the Goleta Groundwater Basin (Basin), and recycled water from the Goleta Wastewater Treatment Plant (GWD 2021). Table 4.15-1 shows projected water supply and demand for the GWD service area. As shown therein, the UWMP has determined GWD has adequate water supplies to meet its projected demands through the year 2040.

GWD's rights to groundwater drawn from the Goleta Groundwater Basin were adjudicated through a Santa Barbara Superior Court case titled Wright v. Goleta Water District [*Wright v. Goleta Water Dist*. (1985) 174 Cal. App.3d74]. The Court's decision was finalized in 1989 and is known as the Wright Judgement. The Wright Judgment gave GWD the right to pump up to 2,000 acre-feet per year (AFY) from the Basin in addition to the right to surplus waters, injected water, return flows, and rights transferred from private pumpers. The Wright Judgment also gave GWD the right to inject excess surface water supplies into the Basin to recharge the Basin and replenish groundwater supplies. GWD has reported an entitlement of 2,357 AFY from the Basin (GWD 2023a).

In addition to its fixed adjudicated allotment, GWD safeguards for less-than-normal rainfall years by storing excess water runoff during high rainfall years. This helps to maintain supplies during drought conditions. Excess surface water (e.g., from Cachuma Project "spill") during high rainfall years is injected into the Basin as recharge through GWD maintained injection wells. The injected recharge volumes are then available to GWD in the future, providing a variable increase in the annual allotment that can be tapped, as needed. Unexercised groundwater rights at the end of a year revert to a stored water right in the Basin (GWD 2023a). As of 2020, GWD reported the storage in the Basin was approximately 44,120 acre-feet (AF) (GWD 2021).

Table 4.15-1 GWD Projected Water Supply and Demand in Acre-Feet

	2025	2030	2035	2040
Normal Year				
Supply Totals	16,240	16,244	16,244	16,244
Demand Totals	10,866	11,325	11,561	11,737
Surplus	**5,374**	**4,919**	**4,683**	**4,507**
Single Dry Year				
Supply Totals	15,464	15,468	15,468	15,468
Demand Totals	11,627	12,118	12,370	12,559
Surplus	**3.837**	**3,350**	**3,098**	**2,909**
Multiple Dry Years				
Year One				
Supply Totals	15,464	15,468	15,468	15,468
Demand Totals	11,627	12,118	12,370	12,559
Surplus	**3.837**	**3,350**	**3,098**	**2,909**
Year Two				
Supply Totals	14,964	14,968	14,968	14,968
Demand Totals	11,627	12,118	12,370	12,559
Surplus	**3,338**	**2,850**	**2,598**	**2,409**
Year Three				
Supply Totals	11,627	12,118	12,370	12,559
Demand Totals	11,627	12,118	12,370	12,559
Surplus	**0**	**0**	**0**	**0**
Year Four				
Supply Totals	11,627	12,118	12,370	12,559
Demand Totals	11,627	12,118	12,370	12,559
Surplus	**0**	**0**	**0**	**0**
Year Five				
Supply Totals	11,627	12,118	12,370	12,559
Demand Totals	11,627	12,118	12,370	12,559
Surplus	**0**	**0**	**0**	**0**

Source: GWD 2021

In response to the extreme drought conditions throughout California, the GWD Board of Directors declared a Stage III Water Shortage Emergency on May 12, 2015. GWD updated watering times and mandatory water use restrictions to ensure adequate supplies for drinking, health, and public safety within the City. Wasting water was prohibited, including irrigating in a manner resulting in runoff from the property, and allowing water to escape from plumbing breaks for more than 48 hours. The GWD Board of Directors also amended the GWD Code to further specify unlawful uses of water, such as through a fire hydrant or fire line, through a waterline with no meter, or from another account holder or property (GWD 2015). On April 9, 2019, in response to an increased allocation of surface water supplies from Lake Cachuma, the GWD Board of Directors lowered the ongoing Water Shortage Emergency from a Stage III to a Stage I (GWD 2019a). On August 13, 2019, receiving a full

allocation of annual surface water supplies from Lake Cachuma, the GWD Board of Directors terminated its Stage I Water Shortage Emergency but continued to impose regulations including prohibiting excess watering causing runoff; requiring use of shutoff nozzles on hoses; turning off irrigation within 48 hours of measurable rainfall; and prohibiting washing sidewalks, driveways, buildings, structures, patios, parking lots, or other hard surfaced areas (GWD 2019b; GWD 2022a). As of January 1, 2024, GWD has stopped water rationing practices due to an increased water supply as a result of record rainfall across California (GWD 2023b).

b. Wastewater

The Goleta Sanitary Water Resource Recovery District (GSD) provides sewer service to the project site. GSD owns and operates sewer infrastructure via 132-mile system of sewer pipes. GSD also provides wastewater treatment for homes and businesses within the Goleta West Sanitary District, the University of California Santa Barbara, the community of Isla Vista, part of Santa Barbara County, and the City of Santa Barbara's Municipal Airport (GSD 2023).

The GSD wastewater treatment plant (WWTP) has the capacity to treat up to 9.8 million gallons per day but is currently limited to a permitted discharge of 7.64 million gallons per day (MGD) pursuant to National Pollutant Discharge Elimination System (NPDES) permit No. CA0048160 (Central Coast Regional Water Quality Control Board [CCRWQCB] 2017). The WWTP is used by multiple entities, and GSD is allocated 47.87 percent of the capacity of the WWTP which equates to approximately 3.66 MGD (Goleta West Sanitary District 2023). Currently, the WWTP treats approximately 4.65 MGD, of which approximately 2.55 MGD is generated by GSD customers (Regis 2023).

c. Stormwater

As discussed in Section 4.9, *Hydrology and Water Quality*, the project site has topography similar to a bowl, with drainage flows directed to an existing stormwater pump which discharges through the San Jose Creek Channel levee into San Jose Creek.

d. Solid Waste

MarBorg Industries provides solid waste collection services in Goleta. All non-hazardous solid waste generated in Goleta is processed at the South Coast Recycling and Transfer Station, and non-recyclable material is sent to the Tajiguas Landfill, both of which are owned and operated by the Santa Barbara County Public Works Department, Resource Recovery and Waste Management Division. The South Coast Recycling and Transfer Station serves as a central collection point for a large portion of the non-hazardous waste generated in the south coast of Santa Barbara County. The South Coast Recycling and Transfer Station has a maximum permitted throughput of 550 tons per day (California Department of Resources, Recycling, and Recovery [CalRecycle] 2023a). The Tajiguas Landfill has a maximum permitted throughput of 1,500 tons per day and a remaining capacity of 4,336,335 cubic yards. The Tajiguas Landfill currently has a cease operation date of 2036 (CalRecycle 2023b).

The City participates in recycling programs aimed at achieving a 75 percent diversion rate of solid waste, consistent with state regulatory requirements. Based on the Fiscal Year 2019-2020 Annual Report for Solid Waste the current diversion rate for Santa Barbara County, including Goleta, is 69 percent (County of Santa Barbara 2020). The City also maintains programs to recycle organics, bulky items, and household hazardous waste (City of Goleta 2023).

e. Electric Power, Natural Gas, and Telecommunications Facilities

There are existing electrical lines and telecommunications lines, which are connected to existing power and telecommunications lines located on South Fairview Avenue. No natural gas infrastructure currently exists at the project site. The project site is within the service areas of the Southern California Edison Company (SCE), Central Coast Community Energy (3CE), and the Southern California Gas Company (SCG), which provide electric power and natural gas services, respectively. Telecommunications services are provided by Verizon, Qwest, AT&T, and Level 3.

4.15.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The Federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary Federal law regulating water quality in the United States and forms the basis for several state and local laws throughout the country. The Clean Water Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental Protection Agency (USEPA) the authority to implement Federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the USEPA and U.S. Army Corps of Engineers. At the state and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB).

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) regulates public water systems that supply drinking water (42 USC Section 300(f) et seq.; 40 CFR Section 141 et seq.). The principle objective of the Federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the Federal SDWA are to:

- Ensure that water from the tap is potable;
- Prevent contamination of groundwater aquifers that are the main source of drinking water for a community;
- Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 CFR Section 144); and
- Regulate distribution systems.

b. State Regulations

California Safe Drinking Water Act

The California SDWA (Health & Safety Code Section 116270 et seq.; 22 CCR Section 64400 et seq.) regulates drinking water more rigorously than the Federal law. Like the Federal SDWA, California requires that primary and secondary maximum contaminant levels (MCLs) be established for

pollutants in drinking water; however, some California MCLs are more protective of health. The Act also requires the SWRCB to issue domestic water supply permits to public water systems.

Sustainable Groundwater Management Act

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act (SGMA) gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the California Department of Water Resources (DWR).

Urban Water Management Planning Act

The Urban Water Management Planning Act of 1983 amended California Water Code to require all urban water suppliers in California to prepare and adopt an UWMP and update it every five years. This requirement applies to all suppliers providing water to more than 3,000 customers or supplying more than 3,000 AFY of water.

California Plumbing Code, Title 24, Part 5

The California Plumbing Code is codified in California Code of Regulations (CCR) Title 24, Part 5. The Plumbing Code contains regulations including, but not limited to, plumbing materials, fixtures, water heaters, water supply and distribution, ventilation, and drainage. More specifically, Part 5, Chapter 4, contains provisions requiring the installation of low-flow fixtures and toilets. Existing development is also required to reduce its wastewater generation by retrofitting existing structures with water efficient fixtures (Senate Bill 407 [2009] Civil Code Sections 1101.1 et seq.)

California Building Energy Efficiency Standards (2022), Title 24, Part 6

CCR Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-residential Buildings. The CEC established Title 24 in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and non-residential buildings. The standards are updated on an approximately three-year cycle to allow consideration and possible incorporation of new efficient technologies and methods.

In 2021, the CEC updated Title 24 standards with more stringent requirements that became effective January 1, 2023. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided these standards exceed those provided in Title 24.

The 2022 update to the Building Energy Efficiency Standards under Title 24 applies to buildings for which an application for a building permit is submitted on or after January 1, 2023. The updated standards mainly established electric-ready requirements when natural gas is installed, expanded solar photovoltaic and battery storage standards, and strengthened ventilation standards to improve indoor air quality (CEC 2021).

California Green Building Standards Code (2022) Title 24, Part 11

The California Green Building Standards Code, commonly referred to as "CALGreen" originally went into effect on August 1, 2009 and outlines architectural design and engineering principles that are in synergy with environmental resources and public welfare. CALGreen sets minimum standards for

buildings, and since 2016, applies to new building construction and some alterations/additions within certain parameters. CALGreen establishes planning and design standards for sustainable site development, including water conservation measures and requirements that new buildings reduce water consumption by 20 percent below a specified baseline. CALGreen requires installations of 1.28 gallons-per-flush toilets and 0.5-gallon-per flush urinals for all non-residential projects as part of the prescriptive method of reducing indoor water use by the required 20 percent.

CALGreen lays out the minimum requirements for newly constructed residential and non-residential buildings to reduce greenhouse gas emissions through improved efficiency and process improvements. It also includes voluntary tiers to encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design. In addition, CALGreen includes several requirements related to solid waste diversion. Importantly, new non-residential construction is required to achieve at least 65 percent construction and demolition waste diversion and provide recycling areas for paper, cardboard, glass, plastics, metal, and organic waste. The 2022 CALGreen update primarily includes new requirements for the inclusion of electric vehicle charging stations and carbon dioxide monitoring and controls in classrooms. These requirements went into effect January 1, 2023.

Assembly Bill 341

The purpose of Assembly Bill (AB) 341 is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. In addition to Mandatory Commercial Recycling, AB 341 set a statewide goal for 75 percent disposal reduction by the year 2020.

Assembly Bill 939

AB 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare source reduction and recycling elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

Senate Bill 1016

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, CalRecycle reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. Beginning January 1, 2018, CalRecycle was required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

c. Local Regulations

Goleta Water District Urban Water Management Plan

The California Water Code requires any municipal supplier serving over 3,000 connections or 3,000 AFY to prepare a UWMP. Water suppliers are required to update their UWMPs every five years. Goleta Water District's 2020 UWMP forecasts demand through 2040 and details normal, dry year, and

multiple dry year supplies needed to meet demand. Additionally, the UWMP describes water supply reliability, conservation and demand management strategies, and GWD's current and anticipated water infrastructure projects.

Goleta Water District Groundwater Management Plan

The Groundwater Management Plan, adopted by GWD and La Cumbre Mutual Water Company which details current adjudication and voter-passed components of groundwater management, addresses Basin hydrogeography and groundwater elevation, and analyzes groundwater quality in the Basin. In addition, the Groundwater Management Plan outlines management strategies for the Basin, and recommends future strategies and timelines for implementation.

Goleta Water District SAFE Water Supplies Ordinance

In 1991 voters of the GWD passed the SAFE Water Supplies Ordinance, which sets forth conditions GWD must meet in order to approve new or additional water connections. The SAFE Ordinance directs how the GWD manages groundwater and specifies under what conditions groundwater is either pumped or stored. In addition, the SAFE Ordinance establishes an Annual Storage Commitment, which is a groundwater recharge requirement when the Central sub-basin of the Goleta Groundwater Basin drops below 1972 levels.

The SAFE Ordinance prohibits GWD from releasing potable water to new or additional service connections except when all of the following conditions are met:

1. GWD is receiving 100% of its deliveries normally allowed from the Cachuma Project.
2. GWD has met legal obligations in the Wright Judgment.
3. There is no water rationing.
4. GWD has met its obligation to the Annual Storage Commitment to the Drought Buffer.

As of January 1, 2024, GWD has met the conditions required to release potable water to new service connections. GWD is permitted to allocate up to 154.7 AF to new or additional water services in 2024.

GWD is required to reevaluate its supplies annually to determine if it can continue to issue new water allocations (GWD 2023b). In the event GWD determines inadequate supplies are available to serve new projects, GWD must deny applications for new water service allocations unless the project falls within one of the following exceptions:

- Customers who are currently receiving water from GWD and who are not seeking to expand or change the use or development on their property.
- Customers with preexisting water use history that is recognized in the GWD Code and that is equal to or greater than the water use that is needed for the proposed project.
- Customers who have already paid a new water supply charge for a proposed project.
- Customers with a pre-existing water service contract or agreement with GWD.

Goleta Water District Code

Goleta Water District Code Chapter 6.21 sets water shortage restrictions during stages of drought, as declared by GWD Board of Directors or GWD's District General Manager. Chapter 6.21 sets restrictions for Stage I through Stage V water shortages, with stricter water restrictions in higher stages of water shortages. These restrictions include, but are not limited to, limitations on

landscaping irrigation, limitations on washing buildings, and the requirement any water pipe leaks are repaired within 48 hours of receiving notice or discovering the leak. In addition, state-mandated water conservation measures are automatically incorporated into Chapter 6.21 and are fully enforceable by GWD (GWD 2022b).

City of Goleta Municipal Code

The Goleta Municipal Code contains requirements for the diversion of solid waste. Specifically, Chapter 8.10 requires construction contractors for all new structures to divert at least 65 percent of all demolition and construction waste by weight from landfills. Chapter 8.10 requires applicants for building or demolition permits involving new structures submit a waste management plan which details the following:

- The estimated volume or weight of project construction and demolition debris, by materials type, to be generated;
- The maximum volume or weight of such materials that can feasibly be diverted via reuse or recycling;
- The vendor and facility that the applicant proposes to use to collect and receive recyclable material; and
- The estimated volume or weight of construction and demolition debris that will be taken to a landfill.

4.15.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Anticipated water demand is estimated based on the County's 2021 *Environmental Thresholds and Guidelines Manual* (refer to Section 4.0, *Environmental Impact Analysis*) water demand rate for Light Industry land uses which corresponds to 0.28 AFY per 1,000 square feet of development. The proposed project's anticipated wastewater generation is calculated consistent with the wastewater generation factor of 100 gallons per day per 1,000 square feet of habitable space used in the City's General Plan/Coastal Land Use Plan Final EIR (City of Goleta 2006). Solid waste generated from demolition and construction is estimated based on a generation factor of 125 pounds per square foot for demolition and 3.89 pounds per square foot for construction, respectively. These metrics are based on the United States Environmental Protection Agency's (USEPA) report titled *Characterization of Building-Related Construction and Demolition Debris in the United States* and information provided by the demolition contractor for this project (LaTray 2023; USEPA 1998). The generation of solid waste from project operation is calculated using the County's 2021 *Environmental Thresholds and Guidelines Manual* estimated for warehouse development (0.0016 tons multiplied by the square footage of a project) and residual solid waste is estimated based on a 50 percent diversion rate.

Significance Thresholds

As described in more detail in Section 4.0, *Environmental Impact Analysis,* the following thresholds are based on the County's 2021 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *State CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds

to determine if a project would have a potentially significant impact on utilities and service systems. Would the project:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;
3. Result in a determination by the waste water 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;
4. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

In addition, the County's 2021 *Environmental Thresholds and Guidelines Manual* provides project-specific and cumulative thresholds for solid waste generation from discretionary development. Pursuant to the City's guidelines, a project would result in a significant impact if it would generate more than 196 tons of solid waste per year, after a 50 percent reduction credit is given due to recycling efforts. Projects with a project-specific impact are also considered to have a cumulatively considerable contribution, as the project-specific threshold of significance is based on a cumulative growth scenario. However, because landfill space is limited, any increase in solid waste of one percent or more of the estimated increase accounted for in Santa Barbara County's Source Reduction and Recycling Element (SRRE) would be considered a less than significant, but adverse contribution to regional solid waste impacts. One percent of the SRRE projected increase in solid waste equates to 40 tons per year. Pursuant to the City's guidelines, to reduce adverse cumulative impacts and to be consistent with the SRRE, mitigation should be recommended for projects that generate between 40 and 195 tons of solid waste.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact UTIL-1 THE PROPOSED PROJECT WOULD REQUIRE INSTALLATION OF UTILITY LINES TO CONNECT TO EXISTING UTILITY INFRASTRUCTURE, THE ENVIRONMENTAL EFFECTS OF WHICH ARE ANALYZED THROUGHOUT THIS ENVIRONMENTAL IMPACT REPORT. THE PROPOSED PROJECT WOULD NOT REQUIRE OR NECESSITATE THE CONSTRUCTION OF ADDITIONAL WATER, WASTEWATER TREATMENT, STORMWATER DRAINAGE, ELECTRIC POWER, NATURAL GAS, OR TELECOMMUNICATIONS FACILITIES BEYOND THE INSTALLATION OF UTILITY CONNECTIONS ON THE PROJECT SITE. THEREFORE, THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Water

The proposed project would require installation of a water line to connect to existing GWD infrastructure. The proposed project would install an 8-inch underground water pipeline that would

connect to an existing 10-inch water line located underneath the sidewalk adjacent to South Kellogg Avenue, as well as six fire hydrants and a six-inch fire water line which would connect to the 8-inch underground water pipeline on-site. The environmental impacts of these utility connections are evaluated throughout this EIR. As discussed in Impact UTIL-2, the proposed project would not generate substantial water demand, and furthermore would not necessitate new or expanded water facilities in order to meet the demand anticipated by the proposed project. The size and use of the proposed building were based on the historical water allocation associated with the use of the site as a drive-in movie theater. Therefore, the proposed project would not require new or expanded water facilities beyond the utility connections evaluated throughout this EIR. This impact would be less than significant.

Wastewater

The proposed project would install an 8-inch underground sewer line which would connect to an existing 30-inch sewer line located underneath South Kellogg Avenue, the environmental impacts of which are evaluated throughout this EIR. As discussed in Impact UTIL-3 GSD's WWTP would have sufficient capacity to treat the anticipated wastewater generated by the proposed project. Accordingly, new wastewater treatment facilities would not be required to accommodate the proposed project's anticipated wastewater demand. The proposed project would not require new or expanded wastewater treatment facilities beyond the sewer line connection evaluated throughout this EIR. Therefore, this impact would be less than significant.

Stormwater

Impacts regarding stormwater drainage facilities are discussed in detail in Section 4.9, *Hydrology and Water Quality*. The proposed project would include the development of a detention basin, vegetated swale, and outlet for discharge into San Jose Creek, the environmental impacts of which are evaluated throughout this EIR. The proposed stormwater drainage facilities would be sized such that post-project peak runoff would be less than pre-project peak runoff for the 100-year flood event. Because the proposed stormwater drainage facilities would allow for stormwater filtration and detention on-site, and excess runoff would be directed to San Jose Creek, no additional stormwater infrastructure would be needed beyond the stormwater infrastructure included as part of the proposed project. As a result, the proposed project would not require upgrades to stormwater infrastructure beyond what is evaluated within this EIR. Therefore, this impact would be less than significant.

Electric, Natural Gas, and Telecommunications Facilities

The proposed project would include the installation of a transformer pad and utility lines which would connect to existing electric, natural gas, and telecommunications infrastructure located underneath South Kellogg Avenue and at an existing utility pole located at the southern border of the project site. The environmental impacts of these utility connections are evaluated throughout this EIR. As described in Section 4.5, *Energy*, 3CE and SCG would have sufficient electricity and natural gas supplies for the proposed project and the proposed project would not place a significant new demand on electricity and natural gas supplies such that new or expanded off-site electrical or natural gas infrastructure would be needed. Similarly, the proposed project would use existing telecommunications facilities during operation and would not require upgrades to existing facilities or create a demand for service unable to be met by existing providers. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 THE PROPOSED PROJECT WOULD GENERATE WATER DEMAND OF APPROXIMATELY 19.8 ACRE-FEET PER YEAR. THE GOLETA WATER DISTRICT HAS DETERMINED THE PROJECT SITE HAS ADEQUATE WATER CREDIT FOR THE PROPOSED PROJECT'S ANTICIPATED DEMAND, AND THE PROPOSED PROJECT'S ANTICIPATED DEMAND WOULD NOT CAUSE A REDUCTION IN WATER SUPPLIES SUCH THAT A WATER DEFICIT WOULD OCCUR. THEREFORE, THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Water demand for the proposed project is estimated using the County's 2021 *Environmental Thresholds and Guidelines Manual* (County of Santa Barbara 2021). Pursuant to the water demand estimate methodology within the *Environmental Thresholds and Guidelines Manual,* a project with a proposed land use which falls within listed categories in Table 7 of the *Environmental Thresholds and Guidelines Manual* shall use the demand factors listed in order to estimate anticipated water demand. Table 7 of the *Environmental Thresholds and Guidelines Manual* provides anticipated water use for Light Industry land uses. According to Table 7, Light Industry land uses are anticipated to have a water demand of 0.28 AFY per 1,000 square feet of development (County of Santa Barbara 2021). Accordingly, development of the proposed 70,594 square foot industrial warehouse building would generate a water demand of approximately 19.8 AFY[1]. In accordance with the SAFE Water Supplies Ordinance, GWD annually reevaluates their supplies to determine if it can continue to issue water allocations to new development (GWD 2023b). If GWD determines supplies are insufficient to provide new water services, a temporary halt on new water services would be put into effect by GWD. However, the project has been allocated water based on historical water credits from the prior on-site use. The proposed project has received a Preliminary Water Service Determination stating GWD has determined adequate water supply is available for the proposed project (Appendix L). Accordingly, GWD has determined the project site has adequate historic water credit for the forecasted demand associated with the proposed project and would serve the proposed project at the time of development.

As shown in Table 4.15-1, GWD has adequate water supplies to meet its projected demands through the year 2040 in normal, dry, and multiple dry years (GWD 2021). GWD's projected water surplus in a normal year 2040 is 4,507 AF. In a single dry-year scenario, GWD's projected water surplus in 2040 is 2,909 AF. The proposed project's anticipated demand of 19.8 AFY represents approximately 0.4 percent of the anticipated 2040 surplus and therefore would not cause a substantial reduction in water supplies such that a water deficit would occur. During multiple dry years, GWD anticipates a water surplus of 2,909 AF in year one and 2,409 AF in year two, with demand and supply totals being equal in years three through five. The proposed project's water demand represents approximately 0.6 percent and 0.8 percent of GWD's dry year one and dry year two surpluses, respectively. Therefore, the proposed project's water demand would not substantially deplete supplies during years one and two of a drought such that a water deficit would occur. The proposed project would adhere to the Goleta Water District Code Chapter 6.21 which sets water shortage restrictions during stages of drought, as declared by GWD Board of Directors or the District General Manager (GWD 2022b). These restrictions include limitations on landscaping irrigation, limitations on washing

[1] 70,594 square feet / 1,000 square feet = 70.594 * 0.28 AFY = 19.8 AFY

buildings, and the requirement any water pipe leaks are repaired within 48 hours of receiving notice or discovering the leak. According to the UWMP, existing water shortage restrictions would result in a 25 percent reduction in water use during years three through five of a drought and result in GWD's ability to meet water demands during a five-year drought (GWD 2021). Since the proposed project would be subject to these restrictions in a drought period, the proposed project would not result in substantial water demand during drought years. The proposed project would not result in substantial water supply reductions; therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact UTIL-3 THE PROPOSED PROJECT'S ANTICIPATED WASTEWATER GENERATION WOULD BE ADEQUATELY ACCOMMODATED BY THE EXISTING CAPACITY OF THE GOLETA SANITARY DISTRICT WASTEWATER TREATMENT PLANT. THEREFORE, THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Future employees would generate wastewater that would flow into GSD's conveyance system and be treated at the WWTP. Currently, the current wastewater inflow to the WWTP is approximately 4.65 MGD, leaving approximately 2.94 MGD of capacity available until the WWTP's permitted capacity is reached. GSD is entitled to receive approximately 1.11 MGD more wastewater flows than what GSD customers currently produce (Regis 2023).

The proposed project's anticipated wastewater generation is calculated consistent with the wastewater generation factor of 100 gallons per day per 1,000 square feet of habitable space used in the City's General Plan/Coastal Land Use Plan Final EIR (City of Goleta 2006). The proposed project includes construction of a 70,594 square foot building. Accordingly, the proposed project's anticipated wastewater generation is approximately 7,059 gallons per day[2], or 0.007 MGD. This wastewater generation represents approximately 0.6 percent of the 1.11 MGD capacity available for GSD customers. The existing WWTP capacity would be sufficient to accept wastewater generated by the proposed project. Therefore, the proposed project would have a less than significant impact related to wastewater generation.

Mitigation Measures

No mitigation measures are required.

[2] 70,594 square feet / 1,000 square feet = 70.594 * 100 gallons per day = 7,059.4 gallons per day

Threshold 4:	Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
Threshold 5:	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-4 THE PROPOSED PROJECT WOULD GENERATE AN ESTIMATED 279 TONS PER YEAR OF SOLID WASTE DURING DEMOLITION AND CONSTRUCTION AND AN ESTIMATED 56.5 TONS PER YEAR OF SOLID WASTE DURING OPERATION. THE ESTIMATED SOLID WASTE GENERATED DURING DEMOLITION AND CONSTRUCTION ACTIVITIES WOULD BE IN EXCEEDANCE OF THE CITY'S PROJECT-SPECIFIC SOLID WASTE THRESHOLD OF 196 TONS PER YEAR. THIS IMPACT WOULD BE CLASS I, *SIGNIFICANT AND UNAVOIDABLE.*

The proposed project would generate solid waste during construction from the demolition of existing structures and construction of the proposed industrial warehouse building. The proposed project would involve the demolition of freestanding movie screen (approximately 2,850 square feet), concessions stand (approximately 3,663 square feet), projector building (approximately 200 square feet), two drive-through ticket booths (approximately 216 square feet), one walk-in ticket booth (approximately 112 square feet), and an agricultural box (approximately 40 square feet). Based on a solid waste generation factor of 125 pounds per square foot for demolition, the demolition of existing structures would result in approximately 443 tons of debris[3]. In addition, based on the USEPA's solid waste generation factor of 3.89 pounds per square foot for construction, the construction of the proposed project would generate approximately 486 tons of debris[4]. In total, demolition and construction activities would generate approximately 929 tons of solid waste. The construction period is estimated to occur over 14 months; therefore, construction activity would result in a waste generation rate of 796 tons per year[5]. Pursuant to Chapter 8.10, Article IV of the Goleta Municipal Code, construction contractors are required to divert 65 percent of all construction and demolition waste by weight from landfill disposal for any new structure. The applicant is required to submit a Waste Management Plan which would indicate how solid waste generated during demolition and construction would be diverted in accordance with City requirements. With compliance with City requirements, the proposed project's demolition and construction activities would generate an estimated 325 tons of non-recyclable waste during the 14-month construction period, or approximately 279 tons per year. This amount of nonrecyclable waste would exceed the City's project-specific threshold of 196 tons per year. Therefore, the proposed project's impacts related to solid waste from demolition and construction activities (short-term) would be potentially significant and mitigation is required.

Pursuant to the methodology of County's 2021 *Environmental Thresholds and Guidelines Manual*, which estimates solid waste generation for warehouse development using a factor of 0.0016 tons multiplied by the square footage of a project, operation of the proposed project would generate approximately 113.0 tons of solid waste per year, which would be reduced to 56.5 tons of non-recyclable solid waste per year, consistent with a 50 percent solid waste diversion rate. This amount of solid waste does not exceed the City's project-specific threshold of 196 tons per year. As a result, operation of the proposed project would not result in excessive solid waste generation and would comply with solid waste management and reduction statutes. Therefore, the proposed project's impacts related to solid waste from operation would be less than significant.

[3] 7,081 square feet * 125 pounds per square foot = 885,125 pounds / 2,000 pounds per ton = 443 tons
[4] 249,636 square feet * 3.89 pounds per square foot = 971,084 pounds / 2,000 pounds per ton = 486 tons
[5] 929 tons / 14 months = 66 tons per month *12 months = 796 tons per year

Mitigation Measures

UTIL-1 Waste Management Plan Additions

In addition to the required components of the Waste Management Plan listed in Chapter 8.10, Article IV of the City's Municipal Code, the City shall require the Waste Management Plan for the proposed project to include the following:

- Implementation of a program to purchase materials that have recycled content for project construction. The project applicant shall note the vendor, types of materials, and quantity of materials with recycled content the applicant shall purchase for construction.
- Implementation of a program which requires the construction contractor to separate excess demolition and construction materials on-site for reuse/recycling or proper disposal. The project applicant shall describe the on-site locations where recyclable and non-recyclable materials shall be stored prior to removal. The project applicant shall provide separate on-site bins as needed for recycling.

The applicant shall submit the Waste Management Plan, with the additional requirements listed above, to the Director of Public Works Department, or designee, for review and approval prior to the issuance of the Zoning Clearance associated with the demolition permit. The Director of the Public Works Department, or designee, shall assign a monitor to the project who shall confirm, on a quarterly basis, demolition and construction waste is being separated on-site for reuse/recycling or proper disposal. The applicant shall submit proof of purchased construction materials with recycled content through submittal of receipts for the purchase of these materials. The Director of the Public Works Department, or designee shall certify the requirements of the Waste Management Plan, with implementation of additional measures listed above, have been met no later than 30 days following the end of construction.

Plan Requirements and Timing: The applicant shall coordinate with the Director of Public Works Department, or designee, and prepare a Waste Management Plan as specified in the measure prior to the issuance of the Zoning Clearance associated with a demolition permit. The applicant shall submit receipts for the purchase of construction materials with recycled content to the Director of the Public Works Department, or designee, prior to the issuance of the Certificate of Occupancy.. The Director of Public Works Department, or designee shall confirm the requirements of the applicant's Waste Management Plan have been met no later than 30 days after the end of construction.

Monitoring: A monitor chosen by the Director of Public Works Department, or designee, shall inspect the project site on a quarterly basis from the start of construction activities.

Significance After Mitigation

Implementation of Mitigation Measure UTIL-1 would impose additional requirements on the applicant's Waste Management Plan which would require the use of recycled material and mandatory waste separation in order to increase solid waste diversion. However, the reduction in waste generation that requires a landfill cannot be fully determined until implementation of Mitigation Measure UTIL-1 is completed. Therefore, the proposed project's short term impacts related to solid waste from demolition and construction activities would remain significant and unavoidable.

4.15.4 Cumulative Impacts

Regional cumulative impacts consider City-wide impacts that would occur from impacts of reasonably anticipated projects identified in Table 3-1 of Section 3, *Environmental Setting*. The general approach to cumulative impact analysis used in this EIR is discussed in Section 3, *Environmental Setting*.

Cumulative development in Goleta would add a total of 467 residential units, 478,395 square feet of industrial space, and 67,060 square feet of commercial space which would increase water demand in Goleta. Using water demand rates for the County's 2021 *Environmental Thresholds and Guidelines Manual* for multifamily development (0.22 AFY/unit), Light Industry (0.28 AFY/1,000 square feet), and General Commercial development (0.30 AFY/1,000 square feet), the additional water demand from cumulative development, assuming all projects are approved, is estimated at approximately 257 AFY. The estimated cumulative water demand of 257 AFY represents approximately 5.7 percent of the 2040 normal year surplus, and approximately 8.8 percent and 10.3 percent of GWD's dry year one and dry year two surpluses, respectively.

Cumulative projects would adhere to the Goleta Water District Code, including water shortage restrictions during drought which would allow GWD to meet water demands during a five-year drought. Pursuant to the SAFE Water Supplies Ordinance, GWD is permitted allocate a maximum 154.7 AF of water supply to new or additional water services in 2024 (GWD 2023b). Cumulative development would be able to utilize GWD's permitted allocation on a first-come-first-serve basis in order to meet water demands associated with cumulative projects. GWD anticipates that new or additional water services in 2024 will require approximately 80 AF of new water allocations (GWD 2024). Accordingly, water demand from cumulative development in 2024 is not anticipated to exceed the GWD's 2024 maximum permitted allocation of 154.7 AFY to new or additional water services. GWD is required to reevaluate its supplies annually to determine if it can continue to issue new water allocations (GWD 2023b). In the event GWD determines inadequate supplies are available to serve new projects, GWD cannot release potable service water to new or additional service connections unless water is being purchased by customers who are receiving water from GWD and not looking to expand or change the use or development on their property, a customer has a preexisting water use history that is equal or greater than the water use that is needed for the proposed project, a customer has already paid for a new water supply charge, or a customer who has a pre-existing water service contract or agreement with GWD. Beyond 2024, if GWD determines it cannot allocate water supply to new connections, cumulative development projects must meet one of the requirements to obtain water services which would ensure water supplies would be distributed to cumulative development in a manner which preserves water supply. Therefore, cumulative development would not deplete GWD's projected water surpluses such that a substantial reduction in water supplies would occur. The proposed project would generate a water demand of approximately 19.8 AFY which represents approximately 0.4 percent of the 2040 normal year surplus, and approximately 0.6 percent and 0.8 percent of GWD's dry year one and dry year two surpluses, respectively. The proposed project has received a Preliminary Water Service Determination stating GWD has determined adequate water supply is available for the proposed project (Appendix L). The proposed project and cumulative development would be subject to GWD water shortage restrictions during drought. Therefore, cumulative development would have a less than significant impact on water supply.

Cumulative development in Goleta would add a total of 467 residential units, 478,395 square feet of industrial space, and 67,060 square feet of commercial space which would increase wastewater generation in Goleta. Consistent with the wastewater generation factors used in the City's General Plan/Coastal Land Use Plan Final EIR (184 to 220 gallons per day per residential unit, and 100 gallons per day per 1,000 square feet of habitable space for commercial and industrial development)

cumulative development would generate approximately 157,286 gallons per day of wastewater, or 0.157 MGD. This is a conservative estimate as it assumes residential units would generate 220 gallons of wastewater per unit per day. This wastewater generation represents approximately 5.3 percent of the 2.94 MGD capacity available at GSD's WWTP. The proposed project's anticipated wastewater demand represents approximately 4.5 percent of the anticipated cumulative demand. Therefore, cumulative development would have a less than significant impact related to wastewater.

Cumulative development would introduce new structures which would require installation of stormwater infrastructure. Cumulative projects would be required to comply with the drainage requirements of Chapter 13.04 of the City's Municipal Code to control and reduce stormwater flows. These requirements would ensure cumulative projects would not substantially affect existing stormwater drainage system or result in inadequate facilities for the control of stormwater runoff. The proposed project would install a detention basin, vegetated swale, and outlet for discharge into San Jose Creek which would be sized such that no additional stormwater infrastructure would be needed beyond the stormwater infrastructure included as part of the proposed project. Therefore, cumulative impacts to stormwater facilities would be less than significant.

Cumulative development would raise the demand for electricity and natural gas in the 3CE and SCG service areas. As described in Section 4.5, *Energy*, electricity and natural gas consumption in Santa Barbara County accounts for approximately 45.5 and 2.5 percent of 3CE's and SCG's total electricity and natural gas use, respectively. Cumulative development in Goleta is not anticipated to result in substantial energy demand such that new 3CE and/or SCG facilities would be required. As described in Section 4.5, *Energy*, the proposed project's electricity and natural gas demand would be incremental compared to the amount of electricity and natural gas 3CE and SCG provides, respectively. Therefore, cumulative impacts to electricity and natural gas infrastructure would be less than significant.

Similar to electricity and natural gas demand, cumulative development would increase the demand for telecommunications infrastructure. However, there is extensive telecommunications infrastructure available in Goleta to serve cumulative development provided by Verizon, Qwest, AT&T, and Level 3. The proposed project would also utilize existing telecommunications facilities and would not substantially increase the demand for telecommunication facilities in Goleta such that construction of a new facility would be required. Therefore, cumulative impacts to telecommunications facilities would be less than significant.

Cumulative development would increase solid waste generation, thereby reducing the capacity of the Tajiguas Landfill. Solid waste generation from demolition and construction of the proposed project is estimated to be 325 tons per year, and the proposed project's operational solid waste is estimated to be 56.5 tons per year. According to the County's 2021 *Environmental Thresholds and Guidelines Manual* projects with a project-specific impact would also be considered cumulatively considerable, as the project-specific threshold of 196 tons per year is based on a cumulative growth scenario. Therefore, project construction would have a cumulatively considerable contribution on impacts related to solid waste, even with implementation of MM UTIL-1. This cumulative impact would be Class I, *Significant and Unavoidable*. In addition, the *Environmental Thresholds and Guidelines Manual* states if solid waste generation exceeds 40 tons per year, it is considered an adverse, yet less than significant, contribution to cumulative impacts to solid waste facilities. Despite implementation of additional requirements for the proposed project's Waste Management Plan for demolition and construction debris, operation of the proposed project would result in waste in excess of 40 tons per year. Therefore, project operation would have an adverse, but not cumulatively considerable contribution on impacts related to solid waste.

4.16 Effects Found Not to Be Significant

This section summarizes the analysis of issue areas for which no significant adverse impacts were identified and, therefore, are not discussed in detail in this Environmental Impact Report (EIR). Each of the potential environmental effects listed below are contained in the environmental checklist form included in Appendix G of the *CEQA Guidelines*. Issue areas discussed in this section include Agriculture and Forestry Resources, Mineral Resources, Population and Housing, Parks and Recreation, and Wildfire. All other potential environmental effects described in Appendix G of the *CEQA Guidelines* but not addressed in this section are addressed in Section 4.1 through 4.15 of this EIR.

4.16.1 Agriculture and Forestry Resources

Potential Environmental Effects

1. Would the project 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?
2. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?
3. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
4. Would the project result in the loss of forest land or conversion of forest land to non-forest land?
5. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest land?

Reasons Why Effects Were Not Found Significant

The project site was developed as a drive-in movie theater in the 1960s. In addition, a public market was previously hosted on Sundays on the project site. Operations of the public market and drive in theater ceased in September 2022. Prior to the development as a drive-in movie theater, the site was used for agricultural purposes which ceased. The project site is surrounded by existing industrial and residential development. According to the California Department of Conservation's (DOC) *California Important Farmland Finder*, the project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importation. Specifically, the project site is designated as Urban and Built-Up Land, which is defined as land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a ten-acre parcel (DOC 2018). The project site is zoned for light industrial and service industrial uses, and is not zoned for agricultural use. Therefore, the proposed project would not have the potential to result in conflicts with existing zoning for agricultural uses or have the potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No impacts to farmlands would occur.

The project site does not contain forest land or timberland and is not zoned for Timberland Production. Development of the proposed project would not conflict with existing zoning, or cause

rezoning of, forest land or land zoned for timberland production; and would not result in the loss of forest land or conversion of forest land to non-forest land. No impacts to forestland would occur.

4.16.2 Mineral Resources

Potential Environmental Effects

1. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
2. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Reasons Why Effects Were Not Found Significant

The California Geological Survey's (CGS) *Updated Mineral Land Classification Map for Concrete Grade Aggregates in the San Luis Obispo-Santa Barbara Production-Consumption Region, California – South Half* indicates the project site is within Mineral Resources Zones 1 (MRZ) and MRZ-3 (CGS 2011). MRZ-1 designations indicate areas containing little or no mineral deposits and MRZ-3 designations indicate deposits identified but require further evaluation. No known mineral resources of value to the region and the residents of the state are present on the project site. Therefore, the proposed project would not 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. No impacts to known mineral resources would occur.

The project site does not include any existing mineral extraction activities, and no mineral extraction activities are planned in the City of Goleta. According to the City's General Plan, the historic Ellwood Oil Field, located in the Ellwood Mesa area approximately 3.4 miles west of the project site, is the only extractive industry within the City (City of Goleta 2006a). However, this facility ceased operation in 2017. proposed project would therefore not interfere with any oil extraction activities located in the Ellwood Mesa area. Therefore, the proposed project would not 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. No impacts to locally important mineral resource recovery sites would occur.

4.16.3 Population and Housing

Potential Environmental Effects

1. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
2. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Reasons Why Effects Were Not Found Significant

The proposed project would not construct new housing or extend roads or other infrastructure. Accordingly, the proposed project would not lead to direct growth due to residential development or indirect growth due to road or infrastructure extensions into undeveloped portions of Goleta. The proposed project would result in approximately 75 additional employees which could cause indirect growth; however, because these jobs would likely come from the local workforce, it is not expected that people would be required to relocate to Goleta. In a conservative scenario where all projected

employees and their families were to relocate to Goleta, there would be a population growth of 198 people based on the city's average persons per household of 2.64 (California Department of Finance [DOF] 2022). Goleta has a current population of approximately 32,591 persons (California Department of Finance [DOF] 2022). With the conservative estimate of 198 additional people relocating to the city, the proposed project would result in a city population of 32,789 persons. An increase in 198 people accounts for approximately nine percent of the total anticipated growth in Goleta and would not exceed the 2050 population projection of 34,700 anticipated by the Santa Barbara County Association of Governments (Santa Barbara County Association of Governments 2019). Therefore, the proposed project's potential to result in population growth is accounted for in regional growth forecasts, and the proposed project would not result in substantial unplanned population growth. Impacts related to population growth would be less than significant.

In addition, the project site is currently developed with a former drive-in movie theater use, which is currently not in operation. Construction of the proposed project would not displace people or housing. Therefore, the proposed project would not necessitate the construction of replacement housing. No impacts related to displacement of people or housing would occur.

4.16.4 Parks and Recreation

Potential Environmental Effects

1. Would the project 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 the public services:

   iv. Parks

2. 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?
3. 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?

Reasons Why Effects Were Not Found Significant

Goleta has approximately 550 acres of parks and open space (City of Goleta 2022b). With Goleta's current population of 32,591, Goleta has approximately 16.9 acres of parkland per 1,000 residents. The proposed project would not directly generate population growth that would result in a need for additional parkland because the proposed project does not include residential uses. Employment opportunities associated with the proposed project may result in an incremental increase in the use of existing neighborhood and regional parks or other recreational facilities. As discussed in Section 4.16.3, *Population and Housing*, in a conservative scenario where the 75 additional employees relocated to Goleta, the project would result in 198 new residents within the city. The addition of up to 198 people would result in a parkland ratio of 16.8 acres of parkland per 1,000 residents which would not be a substantial reduction in parkland available to the residents of Goleta. Furthermore, pursuant to Policy PF 10.2 of the City's Public Facilities Element, the applicant would be required to pay a proportionate share of the costs of new or upgraded capital facilities attributable to new development, including parks and recreation facilities (City of Goleta 2006b). Therefore, the proposed

project would not substantially increase the use of existing park and recreational facilities such that a need for new or physically altered park facilities would occur or physical deterioration of existing facilities would occur or be accelerated. Impacts to parks and recreational facilities would be less than significant.

The proposed project does not involve recreational facilities or require the construction or expansion of recreational facilities. As a result, the proposed project would not have an adverse physical effect on the environment due to the construction or expansion of recreational facilities and no impact would occur.

4.16.5 Wildfire

Potential Environmental Effects

If the project is located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

1. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?
2. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, or thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
3. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuelbreak, emergency water sources, power lines, or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment?
4. Would the project expose people or structures to significant risks, including downslope or downstream flooding, landslides, mud flows, as a result of runoff, post-fire slope instability, or drainage changes?

Reasons Why Effects Were Not Found Significant

The project site is not within a State Responsibility Area (SRA) or lands classified as very high fire hazard severity zones (VHFHSZ) (California Department of Forestry and Fire Protection [CAL FIRE] 2022). The nearest VHFHSZ is located approximately 1.95 miles north of the project site. Existing residential development, commercial development, and United States Route 101 separate the project site from the VHFHSZ. Accordingly, there is a limited potential for substantial impacts to occur due to being located near an SRA or VHFHSZ.

The project site is surrounded by existing development and hardscape, with vegetation located adjacent to the project site to the south and southwest. The proposed project would add native plants for landscaping purposes which would not result in substantial fire risk. The project site is flat, and offshore marine winds blow inland. The proposed project would not substantially change the slope, winds, or other factors such that wildfire risks would be exacerbated. The proposed project would be constructed in accordance with the requirements of the California Fire Code which are implemented to minimize the potential for fire to occur. In addition, the proposed project would be constructed in accordance with the Santa Barbara County Fire Department's (SBCFD) development standards which includes requirements for egress on private driveways, fire hydrant spacing and flow rates, automatic fire sprinkler systems, and automatic alarm systems (SBCFD 2022).

Adherence to State and local regulations would ensure the installation of infrastructure associated with the proposed project would not substantially exacerbate fire risk. The installation of utility lines in the public right-of-way would be subject to the requirements of the City's encroachment permit which would include implementation of a traffic control plan which would comply with the latest edition of the California Manual of Uniform Traffic Devices (City of Goleta 2022a). Adherence to the City's encroachment permit would minimize the potential for the proposed project to substantially impair emergency response as traffic control measures would be implemented during installation of utility lines in the public right-of-way. Applicable guidance documents, such as the City's Emergency Operations Plan (2021) and the County's Multi-Jurisdictional Hazard Mitigation Plan (2017), provide direction for traffic control and management in emergency situations, and the proposed project would not preclude implementation of these plans (City of Goleta 2021; County of Santa Barbara 2017). As a result, the proposed project would not substantially impair an adopted emergency response plan or an emergency evacuation plan.

The project site is flat and does not contain the steep topography necessary to induce substantial landslides or mudflows. In addition, runoff and drainage changes would be minimized during construction and operation as the proposed project would be required to adhere to regulatory requirements which mandate implementation of erosion control measures. The proposed project must obtain coverage under a National Pollutant Discharge Elimination System (NPDES) Construction General Permit and implement the provisions of a Storm Water Pollution Prevention Plan (SWPPP), including BMPs related to erosion control and sediment release. The proposed project must comply with the Central Coast Regional Water Quality Control Board Post-Construction Requirements for Development Projects in the Central Coast Region which entails submittal of a Stormwater Control Plan. The Stormwater Control Plan would be reviewed and approved by the City which would ensure erosion control measures are implemented during operation (City of Goleta 2022c). As a result, the proposed project would not result in substantial runoff, slope-instability, or drainage changes which could lead to post-wildfire flooding, landslides, or mud flows. Impacts related to wildfire would be less than significant.

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5 Other CEQA Required Sections

This section discusses growth-inducing impacts, irreversible environmental impacts, and significant unavoidable impacts that would be caused by the proposed project.

5.1 Growth Inducement

Section 15126.2(e) of the *CEQA Guidelines* requires a discussion of a project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

The proposed project would not construct new housing or extend roads or other infrastructure. Accordingly, the proposed project would not lead to direct growth due to residential development or indirect growth due to road or infrastructure extensions into undeveloped portions of Goleta. The proposed project would result in approximately 75 additional employees, which could cause indirect growth; however, because these jobs would likely come from the local workforce, it is not expected that people would be required to relocated to Goleta. As discussed in Section 4.15, *Effects Found Not to Be Significant*, in a conservative scenario where all projected employees and their families were to relocate to Goleta, there would be a population growth of 198 people which would raise Goleta's population to approximately 32,789 persons. The population growth generated by the proposed project would account for approximately nine percent of the total anticipated growth in Goleta by 2050. This growth would not exceed the Santa Barbara County Association of Government's (SBCAG) 2050 population forecast of 34,700 (SBCAG 2019). Therefore, the proposed project would not induce substantial population growth which could lead to substantial adverse environment effects.

5.1.2 Economic Growth

The proposed project would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, construction of the project would not be growth-inducing from a temporary employment standpoint. However, the proposed project would also provide long-term employment opportunities and generate approximately 75 additional employees in Goleta.

Employment in Goleta is forecasted to increase by 3,860 jobs between 2025 and 2050 (SBCAG 2019). The 75 jobs anticipated to be generated by the proposed project would be approximately 1.9 percent of the projected job growth between 2025 and 2050, and therefore would be within employment forecasts. In a conservative scenario, the proposed project would increase the population of Goleta by approximately 0.6 percent. These employees would be expected to primarily use existing commercial services in Goleta, creating only a minor need for expanded services, the construction of which could cause adverse environmental impacts. As a result, the proposed project would not be

expected to induce economic expansion to the extent that substantial environmental impacts associated with the proposed project would occur.

5.1.3 Removal of Obstacles to Growth

The proposed project would facilitate industrial development on a site that is currently developed with a drive-in movie theater, which is not in operation. The project site is adjacent to residential properties to the east and industrial development to the north and west. The proposed project would rely on South Kellogg Avenue and existing connecting roadways for site access. No new roads would be required for the proposed project. As described in Section 4.14, *Utilities and Service Systems*, the proposed project would utilize existing water, wastewater, and solid waste facilities that serve Goleta. Utility service to the project site would be provided through connections to existing utility infrastructure located adjacent to the southern portion of the project site and underneath South Kellogg Avenue. No additional infrastructure or facilities beyond those necessary to accommodate the proposed project would be required. In addition, no undeveloped land in the vicinity of the project site would benefit through the extension of utility services to the project site. For these reasons, implementation of the proposed project would not extend infrastructure in a manner that would remove any obstacle to growth.

5.2 Significant Unavoidable Effects

CEQA Guidelines Section 15162.2(c) requires that an EIR identify significant impacts that a project would cause which cannot be reduced to a less than significant with the application of mitigation measures. The implications and reasons why the project is being proposed, notwithstanding, must be described.

As discussed throughout Section 4.0, *Environmental Impact Analysis*, implementation of the proposed project would result in significant, unavoidable impacts associated with the following issues:

- **Aesthetics:** project-level impacts to scenic vistas and conflict with applicable zoning and other regulations governing scenic quality (Impacts AES-1 and AES-3 in Section 4.1, *Aesthetics*)
- **Biological Resources:** project-level impact due to conflict with any local policies or ordinances protecting biological resources resulting in the Streamside Protection Area (SPA) setback reduction (Impact BIO-8 in Section 4.3, *Biological Resources*)
- **Land Use:** project-level impacts due to conflict with General Plan/Coastal Land Use plans related to aesthetics and the SPA setback reduction (Impact LU-2 in Section 4.10, *Land Use and Planning*)
- **Solid Waste:** project-level and cumulative impacts related to solid waste generation during construction (short term impact only) (Impact UTIL-4 in Section 4.15, *Utilities and Service Systems*).

5.3 Irreversible Environmental Effects

CEQA Guidelines Section 15162.2(d) requires a discussion of any significant irreversible environmental changes which would be caused by implementation of the proposed project. Such significant irreversible environmental changes may include the following:

- Use of non-renewable resources during the initial and continued phases of the project which would be irreversible because a large commitment of such resources makes removal or non-use unlikely.
- Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) which generally commit future generations to similar uses.
- Irreversible damage which may result from environmental accidents associated with the project.

Construction of the proposed project would require building materials and energy, including non-renewable resources. Consumption of these resources would occur with any development in Goleta and are not unique to the proposed project. The addition of the proposed project would irreversibly increase local demand for non-renewable energy resources such as natural gas and electricity. Any additional vehicle trips associated with the proposed project would incrementally increase local traffic and regional air pollutant and greenhouse gas emissions. However, as discussed in Section 4.2, *Air Quality*, Section 4.5, *Energy*, and Section 4.7, *Greenhouse Gases*, these impacts would be less than significant.

Growth accommodated by the proposed project would require an irreversible commitment of fire protection services, law enforcement, water supply, wastewater treatment, and solid waste disposal services; however, as described in Section 4.12, *Public Services*, and Section 4.14, *Utilities and Service Systems*, these impacts would be less than significant with the exception of solid waste generation during construction, which would be significant and unavoidable.

5.4 Mandatory Findings

Section 15065 of the *CEQA Guidelines* requires the following specific Mandatory Findings of Significance be addressed as part of the environmental review for the project:

- The potential for the project to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory;
- The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals;
- Project 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); and
- Environmental effects of the project which will cause substantial adverse effects on human beings, either directly or indirectly.

Section 4.3, *Biological Resources*, describes the proposed project's potential effects of the project on plant and animal species populations, habitats, communities, and migratory patterns. Section 4.4, *Cultural and Tribal Cultural Resources*, describes the proposed project's potential effects on important historical and prehistorical cultural and tribal cultural resources on the project site. Potential adverse environmental effects to human beings are discussed in Section 4.2, *Air Quality*, Section 4.6, *Geology and Soils*, Section 4.8, *Hazards and Hazardous Materials*, Section 4.9, *Hydrology and Water Quality*,

Section 4.10, *Land Use and Planning*, and Section 4.11, *Noise*. Furthermore, as discussed above, each environmental analysis section of the EIR concludes with a discussion of the proposed project's contribution to cumulative effects.

The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the proposed project.

6 Alternatives

6.1 Introduction

Section 15126.6 of the *CEQA Guidelines* provides guidance for the identification and evaluation of project alternatives in an Environmental Impact Report (EIR). The *CEQA Guidelines* state that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."

As required by Section 15126.6 of the *CEQA Guidelines*, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the following project objectives:

- To develop a project with long-term viability through design by providing sufficient square footage with flexibility of interior size and arrangement for up to 4 tenant spaces with 6 loading docks.
- To develop a project with sufficient height (up to 35 foot maximum) to accommodate a variety of potential tenant needs that are consistent with the General Plan/Coastal Land Use Plan (General Plan) designation of Service/Industrial and zoning designation of Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL).
- Attract local employment opportunities in the industrial sector and generate new property tax revenue for the City.
- Optimize economically beneficial reuse of a previously developed, disturbed, and underutilized site within the City with existing infrastructure and access on a site that has significant land use limitations, including airport, hydrologic, and flooding constraints, that limit compatible uses on the site.
- Provide a permanent critical access easement to the flood channel for the City of Goleta and the Santa Barbara County Flood Control District.

In addition to meeting the project objectives, alternatives were considered that would avoid or substantially lessen the following significant unavoidable adverse impacts identified for the project:

- General Plan inconsistency due to the reduction in 100-foot setback from the San Jose Creek Streamside Protection Area (SPA) (project-level)
- Alteration of scenic views of the Santa Ynez Mountains and foothills from State Route (SR) 217, a locally designated scenic corridor (project-level)
- Inconsistency with Goleta General Plan policies pertaining to the preservation of visual resources along a locally designated scenic corridor (project-level)
- Solid waste generation during demolition and construction (project level and cumulative)

6.2 Project Alternatives

This discussion focuses on alternatives to the project, including alternatives which were considered but ultimately rejected from further evaluation. These alternatives have been selected for their ability to substantially reduce or eliminate one or more of the significant and unavoidable adverse impacts associated with the project, while still meeting basic project objectives. This EIR also evaluates a No Project Alternative, consistent with the *CEQA Guidelines* (Section 15126.6[e]).

6.2.1 Alternatives Considered but Rejected from Further Evaluation

Section 15126.6(c) of the *CEQA Guidelines* requires that an EIR identify alternatives that were considered but rejected as infeasible and provide a brief explanation as to why such alternatives were not fully considered in the EIR. As required by the *CEQA Guidelines*, the selection of alternatives for this EIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet project objectives. Alternatives that do not clearly provide any environmental advantages compared to the project, do not meet basic project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (*State CEQA Guidelines*, Section 15126.6[f][1]).

CEQA Guidelines Section 15126.6(a) also states that "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. Other alternatives may be considered but are not required to satisfy the requirements of CEQA.

For the project, characteristics used to reject alternatives from further consideration include:

- Failure to meet basic project objectives;
- Limited effectiveness in reducing project environmental impacts;
- Inconsistency with City policies;
- Potential for inconsistency with adopted agency plans and policies; and
- Reasonableness of the alternative when compared to other alternatives under consideration.

The following alternatives were considered but eliminated from further analysis by the City due to one or more of these factors.

Alternative Location

The first step in considering an off-site alternative is identifying whether any of the significant impacts of the project would be avoided or substantially lessened by the relocation. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (State CEQA Guidelines, Section 15126.6[f][2][A]). If it is determined that no

feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (State CEQA Guidelines, Section 15126.6[f][2][B]).

No alternative properties to undertake the proposed project are analyzed in this EIR. The project involves redevelopment of a vacant drive-in theater with an industrial warehouse building on approximately 6.75 acres. Based on a review of properties for sale in the City, there are no other properties in the City that could support a development similar to the proposed project, and the project applicant does not own or control any other property within the City that would be suitable for development of the project. Moreover, the applicant cannot reasonably acquire or control an alternative property in a timely fashion that would allow for the implementation of a project with similar uses and square footage. As of March 2024, there are currently no vacant properties that could be redeveloped of similar size for sale in the City (Loopnet 2024). As a result of these considerations, alternative project site locations were considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

Alternative Use – Research and Development

The potential uses of the site are currently limited by the project site zoning and land use designation and location within the vicinity of the Santa Barbara Airport.

The project site has a Goleta General Plan land use designation of Service/Industrial. This designation is applied to areas within the airport flight path where airport operations limit the range and density of activities that may be allowed. Allowable land uses include warehouses, storage, outdoor storage (including storage of vehicles and recreational vehicles), automotive sales and rentals, manufacturing, and heavy commercial uses.

The zoning applicable to the project site is Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL) (Article II, Coastal Zoning Code).[1] The southern two-thirds of the site is zoned M-1, which allows for development of light industrial uses. The northern third of the site is zoned M-S-GOL, which allows for development of service and/or light industrial uses.

The project is subject to the requirements of the 1993 Santa Barbara County ALUP (Airport Land Use Plan). The entire project site is located in Airport Safety Zone II, which includes safety restrictions and height limitations for development within the safety area. Airport Safety Zone II is divided into three safety areas based on the degree of airport hazard. The northern half of the project site is located within Safety Area 1 (Clear Zone) which is the area beneath the airplane takeoff or landing path and is the most restrictive area because it is subject to the greatest airport hazard. The southern half of the project site is located within Safety Area 3 (General Traffic Pattern Zone), which is the area in which airport traffic patterns occur and has the least restrictive requirements. The ALUP development standard of a maximum intensity of 25 people per acre, as a site-wide average, applies to the project site. Allowable building development within Safety Area 1 is limited to warehouse and storage of non-flammable materials, wholesale trade, retail of building materials, auto parking lots, or open space, provided that the density of people on the site are less than 25 people per acre, as a site-wide average. Uses in Safety Area 3 are not specifically restricted, as long as the density does not exceed 25 people per acre.

Rezoning of the site to other uses, such as residential, is not feasible because the project must be compatible with the uses allowed by the ALUP, and these uses are restricted in the Safety Area 1 (Clear Zone) portion of the project site. In addition, residential uses would not meet most of the

[1] While the current zoning on the site is Service Industrial, the project is subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code).

project objectives, including providing tenant spaces consistent with the site zoning, attracting local employment opportunities in the industrial sector, and maximizing economically beneficial use.

The City considered alternative uses on the site that would be compatible with the existing zoning, including a Research and Development (R&D) use, which is allowed in the M-S-GOL and M-1 zoning. While an R&D facility would be allowable in the M-S-GOL and M-1 zoning, it would conflict with the Goleta General Plan land use designation of Service/Industrial (I-S). While a land use designation change could be approved by the City, an R&D facility would conflict with the use allowed by the ALUP because the number of employees would likely exceed 25 people per acre. As a result of these considerations, an alternative use of R&D was considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

Alternative Use – Public Park

The *Parks and Recreation Plan Map* in the Goleta General Plan identifies the project site as a potential planned future park site. The City considered an alternative that would develop the project site as a park with active recreation, including playgrounds and sport fields. Public uses, such as public parks, are allowed in the I-S land use designation, but are not an allowable use in the M-S-GOL and M-1 zoning. In addition, recreational uses are not allowed in the airport Safety Area 1 (Clear Zone). While the ALUP lists recreational uses as an allowable use in Safety Area 3 (General Traffic Pattern Area), density is restricted to 25 people per acre. During peak use of a park, the number of people on the site could exceed 25 people per acre, which would exceed the density allowed by the ALUP. Additionally, a public park would not meet the majority of the project objectives, including providing tenant spaces consistent with the site zoning, attracting local employment opportunities in the industrial sector, and maximizing economically beneficial use. As a result of these considerations, an alternative use of a public park was considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

6.2.2 Description of Alternatives Evaluated

This analysis considers the following three alternatives to the proposed project:

- Alternative 1: No Project Alternative
- Alternative 2: 100-foot Streamside Protection Area Setback
- Alternative 3: Outdoor Storage

Table 6-1 provides a summary comparison of the development characteristics of the proposed project and each of the alternatives considered. Each of these alternatives is described below. The potential environmental effects of each of these alternatives in comparison to the proposed project is described in Section 6.3.

Table 6-1 Comparison of Project Alternatives' Buildout Characteristics

Feature	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Site Use	Industrial Warehouse	Vacant Drive-In Theater	Industrial Warehouse	Outdoor Storage
Structures Demolished	Movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box	None	Movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box	Movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box
Building Square Footage	70,594 sf industrial warehouse	3,663 sf existing concession stand; 200 sf existing projector building	70,594 sf industrial warehouse	70,594 sq feet outdoor construction material and RV storage 500 sf office
Number of Employees	75	0	75	5
Development Area	6.75 ac	11.77 ac	6.87 ac	6.75 ac
Area of Disturbance	293,861 sf	0	299,487 sf	293,861 sf
Impervious Surface Area	184,543 sf	188,963 sf	183,675 sf	184,543 sf
Parking Spaces	101 (9 EV)	600	92 (9 EV)	minimum of 9[2] (1 EV; 8 multi-use [EV or non-EV])
Loading Zones	6	None	8	None
Landscaping	60,939 sf	10,074 sf	106,520 sf	60,939 sf
On-site Trees within Development Area	45	10	54	45
Cut	600 cy	None	300 cy	600 cy
Fill	38,000 cy	None	38,900 cy	38,000 cy
Soil Import	37,400 cy	None	38,600 cy	37,400 cy
Construction Duration	15 months	None	15 months	9 months
Construction Haul Trucks Required for Soil Import	1,100	None	1,148	1,100
Total Daily Operational Passenger Vehicle Trips (One-Way Trips)	224	0	224	89[1]

Feature	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Total Daily Operational Truck Trips (One-Way Trips)	28	0	28	16[1]
Detention Basin	8,321 sf	None	17,625 sf	8,321 sf
SPA Setback	25-feet	50-feet	100-feet	25-feet

[1] Vehicle trips from the outdoor storage use was based on the ITE rates for High-Cube Transload and Short-Term Storage Warehouse for the outdoor storage use (1.4 trips per 1,000 square feet, 15.7% trucks) and General Office for the office building (10.84 trips per day per 1,000 square feet).

[2] Number of required parking spaces would be determined by the Review Authority based on scope/intensity of the use per Chapter 17.38 of Goleta Municipal Code.

ac = acres

cy = cubic yards

EV = Electric Vehicle

sf = square feet

SPA = Streamside Protection Area

6.2.2.1 Alternative 1: No Project Alternative

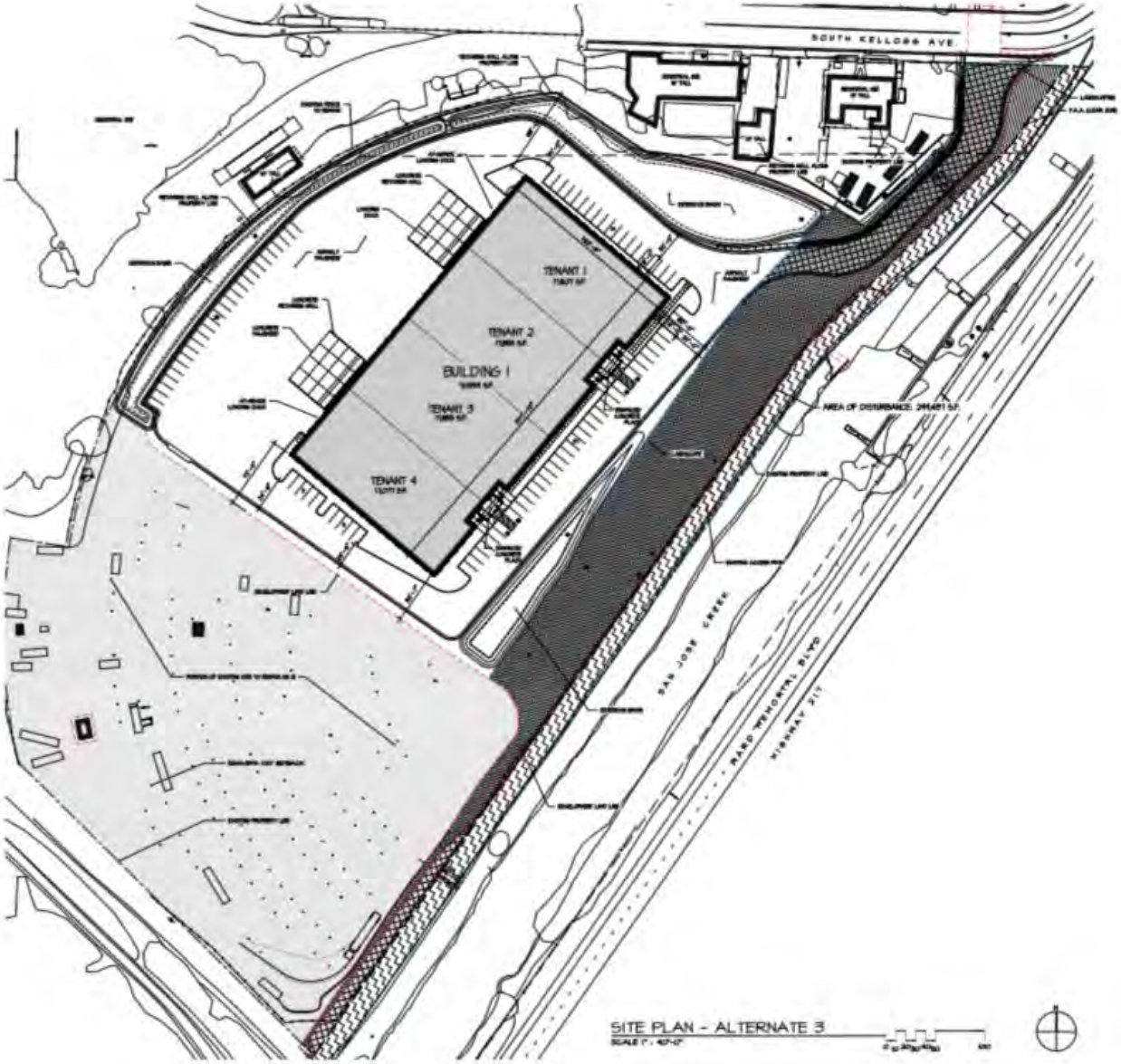
The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. According to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved. The No Project Alternative assumes that the proposed project is not approved and the industrial warehouse building is not constructed. The project site would remain a vacant drive-in theater and the existing on-site structures, including concessions building, movie screen, ticket booths, and projector buildings would not be demolished.

6.2.2.2 Alternative 2: 100-foot Streamside Protection Area Setback

Alternative 2 would include similar components as the proposed project and would be constructed on the same project site. However, as shown in Figure 6.3-1, the layout and shape of the proposed industrial building would be reconfigured and the location on the project site would be shifted to the northwest and southwest in order to avoid development within the San Jose Creek 100-foot SPA buffer to the extent feasible, and would also be 63 feet further from State Route 217 compared to the proposed project. Development within the 100-foot SPA would be limited to access road improvements, installation of the underground utility trench, and the addition of landscaping, which would consist of native California riparian and upper wetland habitat. Like the proposed project, the square footage of the industrial warehouse would be 70,594 sf. Electricity would be supplied by Central Coast Community Energy (3CE) using 100 percent renewable energy sources. Due to the reconfigured footprint of the proposed building, an additional 1,600 cy of fill would be required to elevate the building above the floodplain compared to the proposed project. Like the proposed project, Alternative 2 would require demolition of the existing movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box.

Table 6-1 provides the characteristics and construction details of Alternative 2.

Figure 6.3-1 Alternative 2 Site Plan



6.2.2.3 Alternative 3: Outdoor Storage

Alternative 3 would include a 70,594 sf outdoor storage facility on the same project site as the proposed project. Alternative 3 would be developed on approximately 6.75 acres of the northeastern portion of the project site, in the same location as the proposed project. Half of the outdoor storage area would support storage of construction materials in storage bays and half would support recreational vehicle (RV) storage. Alternative 3 would include a 500-square foot office building with a restroom, which would be constructed in the northeastern corner of the project site. Electricity would be supplied by 3CE using 100 percent renewable energy sources. Nine parking spaces would be provided, all of which would include EV charging stations. Like the proposed project, Alternative 3 would require demolition of the existing movie screen, concessions stand, projector building, two drive-through ticket booths, one walk-in ticket booth, and an agricultural box. Like the proposed project, between 4 to 6 feet of fill would be used to elevate the outdoor storage area and office building above the 100-year floodplain elevation, which would require 37,400 CY feet of soil to be imported to the site. Like the proposed project, development of Alternative 3 would include a request to reduce the 100-foot SPA buffer at San Jose Creek to 25 feet along the entire project site boundary adjacent to San Jose Creek.

Table 6-1 provides the characteristics and construction details of Alternative 3.

6.3 Alternatives Impact Analysis

6.3.1 Alternative 1: No Project Alternative

Impacts Summary

Alternative 1 assumes the proposed project is not approved and the industrial warehouse building is not constructed. No demolition, construction, or operation of proposed industrial uses would occur. Therefore, Alternative 1 would result in no impact to each environmental issue area analyzed. In comparison to the proposed project, Alternative 1 would result in reduced impacts to each issue area, aside from specific environmental issues dependent on site-specific conditions which the proposed project would result in no impact (i.e., proximity to scenic highways, conflicts with habitat conservation plans, effects on historical resources, Alquist-Priolo earthquake fault zones, landslides, expansive soils, hazardous materials within 0.25-mile of a school, and physically dividing an established community). However, the No Project Alternative would not fulfill any of the project objectives.

a. Aesthetics

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

The project site would remain a vacant drive-in theater and the existing on-site structures, including concessions building, movie screen, ticket booths, and projector buildings would not be demolished. Therefore, Alternative 1 would maintain existing conditions at the project site and would not result in a substantial adverse impact on a scenic vista. Alternative 1 would have no impact on scenic vistas, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would not involve new development and would maintain existing conditions at the project site. Therefore, Alternative 1 would have no impact to scenic resources within a state scenic highway, which would be the same level of impact than the proposed project.

Threshold: If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Alternative 1 would not result in new development that would conflict with applicable zoning or other regulations that govern scenic quality. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project. However, Alternative 1 would result in the project site remaining unused and subject to further degradation.

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

Alternative 1 would not result in new sources of light and glare, as no new development would occur and the site would remain vacant. Therefore, Alternative 1 would result in no impact involving the creation of a new source of light and glare that could adversely affect daytime or nighttime views, which would be a lesser level of impact than the proposed project.

b. Air Quality

Threshold: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Alternative 1 would not result in new development, and the project site would remain a vacant drive-in theater. No demolition or construction activities would occur. Therefore, no direct or indirect emissions would need to be accommodated under the 2022 Ozone Plan. Alternative 1 would not conflict with or obstruct the implementation of the 2022 Ozone Plan. No impact would occur, which would be a lesser level of impact than the proposed project.

Threshold: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. No demolition or construction activities would occur. In addition, no operational activities from existing structures would occur; therefore, Alternative 1 would not generate air pollutant emissions and would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. No impacts would occur, which would be a lesser level of impact than the proposed project.

Threshold: Would the project expose sensitive receptors to substantial pollutant concentrations?

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. No demolition, construction, or operational activities would occur. The vacant site would not generate air pollution emissions; therefore, Alternative 1 would not expose sensitive

receptors to substantial pollutant concentrations. No impact would occur, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. No demolition or construction activities would occur. Therefore, Alternative 1 would not generate odors. No impact would occur, which would be a lesser level of impact than the proposed project.

c. Biological Resources

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

Alternative 1 would maintain existing conditions at the project site and would not result in new development that would have a substantial adverse effect, either directly or indirectly, on special-status species. Alternative 1 would result in no impact to special-status species, which would be a lesser level of impact than the proposed project.

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

No sensitive natural communities are located on the project site. Alternative 1 would maintain existing conditions at the project site and would not result in new development that would adversely impact riparian habitat, either directly or indirectly. Alternative 1 would result in no impact to riparian habitat, which would be a lesser level of impact than the proposed project.

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

In contrast to the proposed project, Alternative 1 would not involve construction activities that could result in temporary impacts to jurisdictional wetland features, as no new development would occur for Alternative 1. Alternative 1 would have no impact to wetlands, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would maintain existing conditions at the project site and would not involve new development that could substantially interfere with the movement of fish or wildlife species. Alternative 1 would have no impact on wildlife movement, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would not involve new development that would conflict with a local policy or ordinance that protects biological resources. In contrast to the proposed project, Alternative 1 would not conflict with the City's Conservation Element Policy CE 2.2, as the 100-foot setback from San Jose Creek would be maintained. Therefore, Alternative 1 would have no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Alternative 1 would be located on the same project site as the proposed project. The project site is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. Therefore, Alternative 1 would have no impact related to conflicts with these plans, which is the same level of impact as the proposed project.

d. Cultural Resources

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

Alternative 1 would not involve the removal of existing structures on the project site and would maintain existing conditions. Furthermore, the existing buildings on the project site are not eligible as historic resources. Alternative 1 would result in no impact on historical resources, which would be a similar level of impact as the proposed project.

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

No new development on the project site would occur. Consequently, Alternative 1 would not involve ground-disturbing activities that could potentially damage or disturb subsurface archaeological resources. Therefore, Alternative 1 would have no impact on archaeological resources, which would be a lesser level of impact than the proposed project.

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

No new development on the project site would occur. Consequently, Alternative 1 would not involve ground-disturbing activities that could potentially damage or disturb human remains. Therefore, Alternative 1 would have no impact on human remains, which would be a lesser level of impact than the proposed project.

e. Energy

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

No new development on the project site would occur. Consequently, Alternative 1 would not involve any demolition or construction activities that could use energy resources. Under Alternative 1, the

drive-in theater would continue to not be operational and would not use energy resources. Therefore, Alternative 1 would have no impact related to wasteful, inefficient, or unnecessary consumption of energy resources, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would not include any demolition, construction, or operational activities. Therefore, Alternative 1 would not result in energy use and would have no impact related to conflicts with state or local renewable energy or energy efficiency plans, which would be a lesser level of impact than the proposed project.

f. Geology and Soils

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

Alternative 1 would be located on the same project site as the proposed project. There is no Alquist-Priolo fault located on the project site, and the risk of fault rupture is low. In contrast to the proposed project, which would introduce employees to the project site, Alternative 1 would maintain existing conditions and the project site would remain vacant. Alternative 1 would have no impact involving fault rupture, which would be the same level of impact as the proposed project.

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

The project site is located in a region of high seismic activity, with the potential for large seismic events that could generate strong ground shaking. The project site would remain vacant and would not include the construction of new structures. Therefore, Alternative 1 would not involve new development on the project site that could increase the risk of loss, injury, or death due to seismic ground shaking compared to existing conditions. Therefore, Alternative 1 would have no impact involving seismic ground shaking, which would be a lesser level of impact than the proposed project.

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

and

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

The project site is not at risk of landslides, lateral spreading, or collapse. Both liquefaction and settlement are potential concerns for project site soils. However, Alternative 1 would not change the existing, vacant condition of the project site. Therefore, the project would not increase the potential for unstable soils compared to existing condition. Alternative 1 would have no impact involving unstable soils, which would be a lesser level of impact than the proposed project.

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

The project site is not located in a landslide hazard area and is not subject to landslide risk. Alternative 1 would have no impact involving landslides, which would be the same level of impact as the proposed project.

Threshold: Would the project result in substantial soil erosion or the loss of topsoil?

Project site soils are highly erodible. However, Alternative 1 would not involve construction activities, such as grading, that would increase the potential for erosion and sedimentation. Alternative 1 would maintain existing drainage patterns on the project site and would not result in new sources of runoff that could contribute to project site erosion and the loss of topsoil. Alternative 1 would have no impact involving substantial soil erosion or the loss of topsoil, which would be a lesser level of impact than the proposed project.

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

Similar to the proposed project, Alternative 1 would not create substantial direct or indirect risks to life or property due to expansive soils because on-site soils are not expansive. For Alternative 1, no impact involving expansive soils would occur, which would be the same level of impact as the proposed project.

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

Alternative 1 would not involve the use of septic tanks or alternative wastewater disposal systems. Alternative 1 would result in no impact, which would be the same level of impact as the proposed project.

Threshold: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are no documented paleontological resources at the project site. For Alternative 1, no new development on the project site would occur. Consequently, Alternative 1 would not involve ground-disturbing activities that could potentially damage or disturb unanticipated paleontological resources. Therefore, Alternative 1 would have no impact on paleontological resources, which would be a lesser level of impact than the proposed project.

g. Greenhouse Gas Emissions

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

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. No demolition or construction activities would occur. In addition, no operational activities would occur; therefore, Alternative 1 would not generate greenhouse gas (GHG) emissions and would not have a significant impact on the environment. No impacts would occur, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. No demolition or construction activities would occur. In addition, no operational activities would occur; therefore, Alternative 1 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No impacts would occur, which would be a lesser level of impact than the proposed project.

h. Hazards and Hazardous Materials

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

Alternative 1 would not involve new development on the project site and the project site would remain vacant. Consequently, Alternative 1 would not involve the routine transport, use, or disposal of hazardous materials. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would not result in the demolition of existing structures on the project site, and would not risk the release of asbestos-containing materials (ACM) and lead-based paints (LBP), which may be present in on-site structures. As Alternative 1 would not result in new development, Alternative 1 would not disturb existing hazardous materials in surficial soil to the west of the existing concession stand. Furthermore, Alternative 1 would not require groundwater dewatering, and would not necessitate the proper treatment and disposal of potentially contaminated groundwater. Alternative 1 would result in no impact involving the accidental release of hazardous materials, which would be a lesser level of impact than the proposed project.

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

The project site is not located within 0.25 mile of an existing or proposed school. Therefore, Alternative 1 would have no impact associated with emissions of hazardous materials, substances, or wastes within 0.25 mile of a school, which would be the same level of impact as the proposed project.

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

There are no hazardous materials sites mapped within the project site. As such, Alternative 1 would not create a significant hazard to the public or the environment due to hazardous materials sites. For Alternative 1, no impact would occur, which would be the same level of impact as the proposed project.

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

The Santa Barbara Municipal Airport is located approximately 0.25 mile west of the project site. The northern portion of the project site is located within the Clear Zone of the Santa Barbara Airport and the entire project site is within the Airport Influence area of the Santa Barbara Municipal Airport. In addition, the project site falls within the 20,000-foot Federal Air Regulations (FAR) Part 77 Notification Area for the Santa Barbara Municipal Airport. In contrast to the proposed project, Alternative 1 would not result in new construction or the addition of new on-site employees to the project site, and the project site would remain vacant. Alternative 1 would result in no impact involving airport hazards, which would be a lesser level of impact than the proposed project.

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

The City's General Plan does not identify roadways adjacent to the project site as major evacuation routes. Alternative 1 would maintain existing, vacant conditions at the project site, and would not involve construction vehicles or operational traffic that could potentially interfere with an adopted emergency response or emergency evacuation plan. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

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

The project site is not within a State Responsibility Area (SRA), or lands classified as very high fire hazard severity zones (VHFHSZ). The nearest VHFHSZ is located approximately 1.95 miles north of the project site. Existing residential development, commercial development, and United States Route 101 (U.S. 101) separate the project site from the VHFHSZ. The existing drive-in theater would remain vacant, and would not introduce new on-site employees or uses to the project site. Alternative 1 would result in no impact involving wildland fires, which would be a lesser level of impact than the proposed project.

i. Hydrology and Water Quality

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

Alternative 1 would not result in demolition or new construction that could violate water quality standards or waste discharge requirements. No new sources of pollutants would be introduced to the project site, and existing drainage patterns would be maintained. Therefore, Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would not involve construction and consequently would not require groundwater dewatering. Alternative 1 would not change the operational water demands for the project site, and would not introduce new impervious surfaces that could affect groundwater recharge. Therefore, Alternative 1 would have no impact involving the substantial decrease of groundwater supplies or

interference with groundwater recharge, which would be a lesser level of impact than the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?

and

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

and

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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?

Alternative 1 would not involve new development and would maintain existing conditions at the project site. Therefore, Alternative 1 would not substantially alter the drainage pattern of the project site, including through the alteration of a course of a stream or river or through the addition of impervious surfaces. Alternative 1 would not result in substantial erosion or siltation, increased runoff, or additional sources of polluted runoff. Alternative 1 would have no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

and

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

The project site is located outside of a tsunami hazard zone and is not proximate to a large body of water and therefore is not subject to seiche. Therefore, as with the proposed project, Alternative 1 would not risk release of pollutants in a tsunami hazard zone or seiche hazard zone.

Alternative 1 would be located on the same project site as the proposed project and therefore is subject to similar flood hazards. Although the project site is mapped as being located within a 100-year floodplain, the project site is not currently inundated by 100-year flood flows in the existing condition. Off-site rain and stormwater does not enter the project site due to the presence of an existing earthen berm around the project site. The berm prevents 100-year flood flows from entering the project site.

The project site is within the inundation zone of the Rancho Del Ciervo dam. Alternative 1 would not include any features which would preclude routine dam inspection or otherwise increase the risk for dam failure and inundation.

No new sources of pollutants would be introduced to the project site. Therefore, Alternative 1 would not redirect flood flows and would not risk the release of pollutants due to project inundation. No impacts would occur, which would be a lesser level of impact than the proposed project.

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

The Basin Plan, adopted by the Central Coast RWQCB, is the water quality control plan applicable to the project site. Alternative 1 would not result in water quality impacts related to erosion, groundwater dewatering, construction of new development, or addition of new uses to the site. Therefore, Alternative 1 would not conflict with the Basin Plan, and would result in no impact, which would be a lesser level of impact than the proposed project.

GWD's Groundwater Management Plan Goleta Groundwater Basin (2022) serves as the guiding document for GWD to manage groundwater in accordance with the Wright Judgement. Alternative 1 would not adversely impact groundwater supplies or the management of the Goleta Groundwater Basin in accordance with the Wright Judgement as Alternative 1 would not involve water consumption or groundwater extraction. Therefore, Alternative 1 would not conflict with the Groundwater Management Plan Goleta Groundwater Basin, and would result in no impact, which would be a lesser level of impact than the proposed project.

j. Land Use and Planning

Threshold: Would the project physically divide an established community?

The project site is primarily surrounded by industrial and open space land uses. The nearest residential development to the project site is located to the east, across State Route 217. The project site is neither directly adjacent to residences nor located in a residential neighborhood. Alternative 1 would not include new construction that could physically divide an established community and would result in no impact, which would be the same level of impact as the proposed project.

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

Alternative 1 would maintain existing conditions at the project site and would not result in new development. In contrast to the proposed project, Alternative 1 would not conflict with Goleta General Plan Policy CE 1.6, CE 2.2, and CE-2.6 intended to protect ESHAs, SPAs, and creeks, respectively. Furthermore, Alternative 1 would not conflict with Goleta General Plan Policy LU 1.8, VH 1.1, VH 2.2, and VH 2.3, intended to protect scenic views and neighborhood compatibility. Alternative 1 would not conflict with the Goleta General Plan and would have no impact involving conflict with existing plans adopted for the purpose of avoiding or mitigating an environmental effect, which would be a lesser level of impact than the proposed project.

k. Noise

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

Alternative 1 would not involve demolition or removal or construction, including grading and excavation. Therefore, this alternative would not result in the generation of construction noise levels that exceed City of Goleta standards. As the existing drive-thru use of Alternative 1 would still be inoperable and vacant, the alternative would have no impact from operational noise. Alternative 1 would have no impacts related to noise, and impacts would be reduced compared to the proposed project.

Threshold: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Alternative 1 would not involve construction activities that would generate ground-borne vibration. No impact would occur, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would maintain existing conditions on the site, and the existing drive-in theater would remain vacant. Therefore, Alternative 1 would not expose people to noise from the Santa Barbara Airport. No impact would occur, which would be a lesser level of impact than the proposed project.

l. Public Services

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

and

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

and

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

and

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

Alternative 1 would not result in new residents or employees at the project site. Therefore, Alternative 1 would not result in population growth that could affect demand for public facilities, including fire protection, police protection, schools, or other public facilities. Alternative 1 would result in no impact to public facilities, which would be a lesser level of impact than the proposed project.

m. Transportation and Circulation

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

Alternative 1 would not result in new development or uses at the project site and would not introduce features that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Alternative 1 would be consistent with the City's Transportation Element policies. Alternative 1 would not cause changes to the existing bicycle facilities on Hollister Avenue, Fairview Avenue, or Ward Drive. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would maintain the existing vacant conditions at the project site and would not introduce new uses that would increase vehicle miles traveled (VMT) within Goleta. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

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

Alternative 1 would not result in new development that could increase roadway hazards due to geometric design features or incompatible uses. Alternative 1 would result in no impact, which would be a lesser level of impact than the proposed project.

Threshold: Would the project result in inadequate emergency access?

Alternative 1 would not result in new development, and consequently, would not require construction vehicles or construction staging areas that could affect emergency access. Alternative 1 would result in no impact involving inadequate emergency access, which would be a lesser level of impact than the proposed project.

n. Tribal Cultural Resources

Threshold: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Alternative 1 would be located on the same site as the proposed project. Based on Native American consultation conducted for the proposed project, no tribal cultural resources have been identified on the project site. No new development on the project site would occur. Consequently, Alternative 1 would not involve ground-disturbing activities that could potentially damage or disturb unanticipated tribal cultural resources. Therefore, Alternative 1 would have no impact on unknown tribal cultural resources, which would be a lesser level of impact than the proposed project.

o. Utilities and Service Systems

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

and

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

and

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

Alternative 1 would maintain the existing vacant conditions at the project site and would not result in new demand for water, wastewater, stormwater, electric, natural gas, or telecommunications facilities. Alternative 1 would not involve an increase in water demand or wastewater generation. Alternative 1 would have no impact, which would be a lesser level of impact than the proposed project.

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

and

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

In contrast to the proposed project, Alternative 1 would not involve demolition and consequently would not generate demolition debris. No new development or new uses on the site would occur, and no new sources of solid waste generation would be introduced. Therefore, Alternative 1 would have no impact involving solid waste, which would be a lesser level of impact than the proposed project.

6.3.2 Alternative 2: 100-foot Streamside Protection Area Setback

Impacts Summary

Alternative 2 would include demolition of the same existing drive-in theater structures as the proposed project and construction of the same sized storage warehouse. However, the layout and shape of the proposed industrial building would be reconfigured and the location on the project site would be shifted to the northwest and southwest in order to avoid development within the San Jose Creek 100-foot SPA buffer to the extent feasible. This would require import of 1,200 cubic yards of more fill than the proposed project.

The development characteristics (i.e., number of employees) of Alternative 2 are the same as the proposed project; therefore, impacts related to per capita generation, such as impacts related to public services, and utilities and service systems would be the same as the proposed project. Alternative 2 would include two additional loading zones in comparison to the proposed project; however, these additional loading zones would not result in increased truck trips in comparison to the proposed project. The relocation of Alternative 2's proposed development on the project site outside of the 100-foot SPA buffer would result in reduced impacts related to biological resources in comparison to the proposed project. However, the relocation of Alternative 2's proposed development on the project site would require additional construction haul trips and soil export, which would marginally increase greenhouse gas and energy use. In addition, the relocation of Alternative 2's proposed development would potentially move construction equipment closer to residential development, resulting in increased construction noise at sensitive receptors in comparison to the proposed project. Alternative 2 would not worsen any significance conclusions in comparison to the proposed project. In addition, Alternative 2 would fulfill all the project objectives.

a. Aesthetics

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

Similar to the proposed project, Alternative 2 would construct an approximately 70,594-square-foot "high cube" industrial building, with a height of 35 feet from finished grade. Compared to the proposed project, the layout and shape of the proposed industrial building would be reconfigured and the location on the project site would be shifted to the northwest and southwest. Because Alternative 2 would include placement of fill to elevate the structure above the floodplain, the total height of the structure would be approximately 40 feet above existing grade, which would be consistent with height limits of the M-S-GOL and M-1 zones, pursuant to the City's previous Coastal Zoning Ordinance. The proposed industrial building would include aesthetic features such as architectural detailing and landscaping, which would reduce building massing and integrate the proposed building with natural areas of vegetation growing along SR 217. The proposed building

would be constructed from concrete of muted, natural colors (e.g., gray and tan), with dark blue accents.

Given the site's distance (0.9 mile and 0.7 mile respectively) from U.S. 101 and Hollister Avenue, the proposed industrial building would not substantially degrade views from these locally designated scenic corridors. However, construction of the proposed industrial building under Alternative 2 may affect a locally designated scenic corridor along SR 217. Compared to the proposed project, the Alternative 2 building would be placed 63 feet farther away from SR 217. The Alternative 2 building would be visible from lanes traveling in both directions along SR 217, although vegetation would obscure most of the project site from the roadway. Figure 6.3-2 and Figure 6.3-4 demonstrate, through visual renderings (Photographs 2), that the industrial building proposed under Alternative 2 would rise above existing and proposed vegetation and the surrounding one- to two-story industrial development and would obstruct northward scenic views of the foothills and Santa Ynez mountains. Figure 6.3-3 and Figure 6.3-5 show the visual renderings of the proposed project from SR 217, included in Section 4.1, *Aesthetics*, for comparison. The proposed building would have substantially more mass than the existing movie screen. The existing movie screen and laurel sumac shrubs behind the movie screen would be removed under Alternative 2; consequently, the proposed building would be more visible from SR 217 when compared to existing conditions until the proposed cypress trees have matured, which would take approximately 10 to 12 years to reach a height of 30 feet. While Alternative 2 would be consistent with the height limitation of 35 feet from finished grade, the proposed industrial building would be constructed on fill material, giving the proposed building the appearance of being taller than surrounding development and emphasizing the proposed building against the scenic vista. Similar to the proposed project, the addition of the Alternative 2 building would constitute a potentially significant impact to the northward scenic vista experienced from SR 217.

Alternative 2 would also alter public views of the site from Kellogg Avenue and South Fairview Avenue. As shown in Figure 6.3-6, the view from Kellogg Avenue would be largely obstructed by construction of the proposed industrial building (Photograph 2). Also shown in Figure 6.3-8, the proposed industrial building would be elevated above vegetation levels, so the building would be visible from South Fairview Avenue (Photograph 2). Figure 6.3-7 and Figure 6.3-9 show the visual renderings of the proposed project from Kellogg Avenue and South Fairview Avenue, respectively, which are included in Section 4.1, *Aesthetics*, for comparison. However, the Visual and Historic Resources Element of the Goleta General Plan does not recognize these roadways as scenic view corridors that provide scenic views, given the generic nature of surrounding development and lack of scenic resources on these two roadways. Similar to the proposed project, changes to views from these local roadways would be less than significant, as Alternative 2 would add to existing development and these roadways are not considered scenic views.

Considering Alternative 2 would substantially alter scenic views of the Santa Ynez Mountains and foothills from SR 217, a locally designated scenic corridor, Alternative 2 would overall have a potentially significant impact to scenic vistas, similar to the proposed project. Similar to the proposed project, there is no feasible mitigation to reduce this significant impact because the proposed building height is the minimum height required to support the high-cube warehouse use and the proposed 4 to 6 feet of fill is necessary to elevate the proposed building above the 100-year floodplain. Therefore, impacts to scenic corridors would be significant and unavoidable.

Figure 6.3-2 Alternative 2: Existing and Simulated Views from SR 217 Facing West



Photograph 1. Existing westward view of the project site from SR 217. Vegetation obscures most of the project site.



Photograph 2. Simulated westward view of Alternative 2 from SR 217 with visual simulation of the proposed industrial building and landscaping.

Figure 6.3-3 Proposed Project: Existing and Simulated Views from SR 217 Facing West

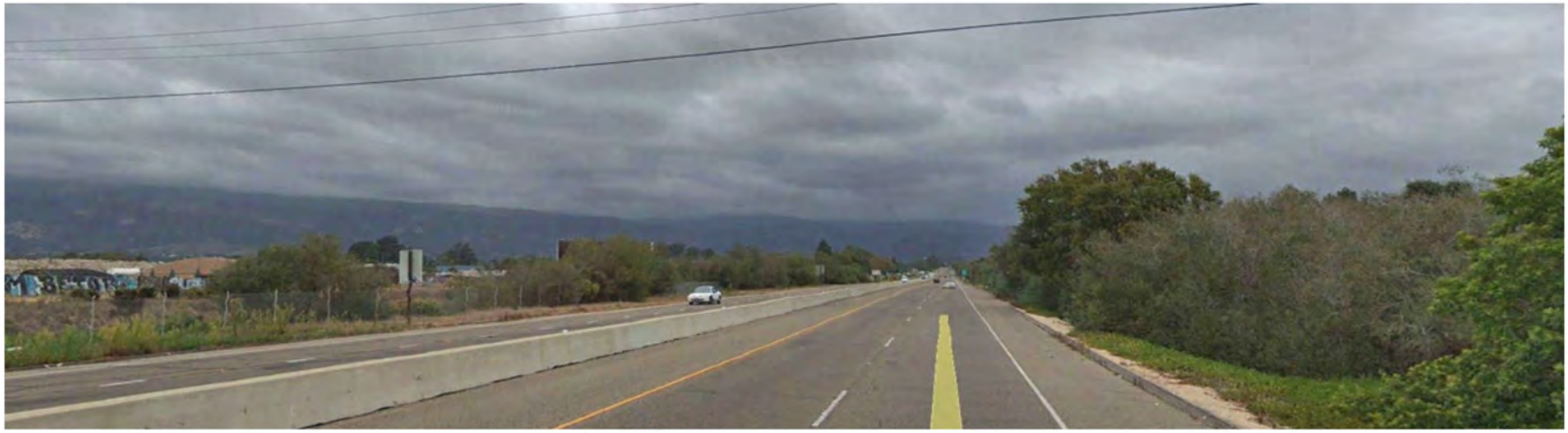


Photograph 1. Existing westward view of the project site from SR 217. Vegetation obscures most of the project site.

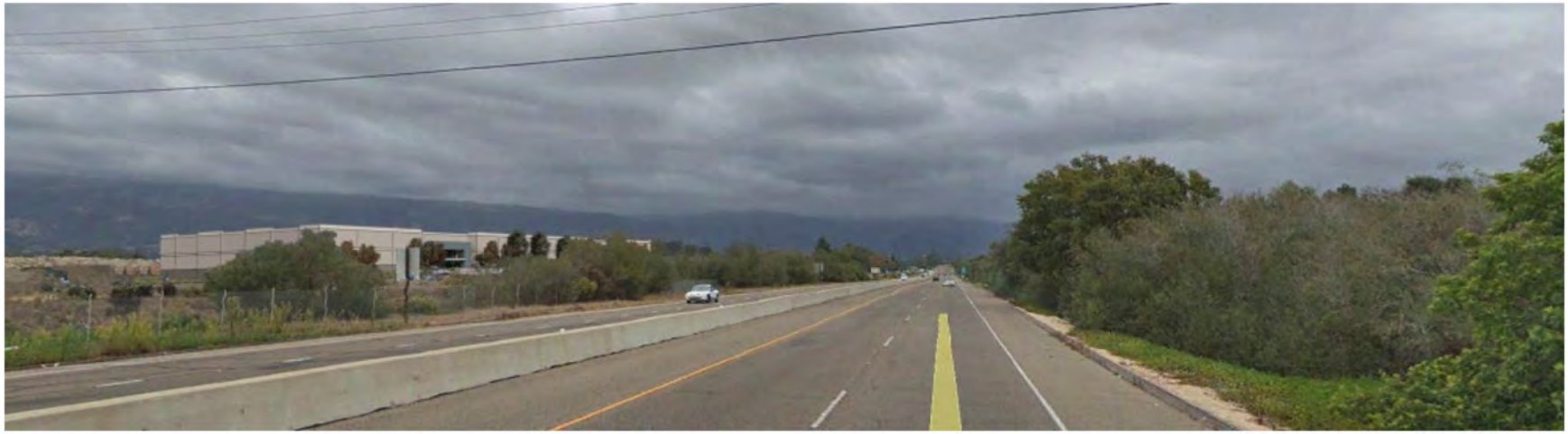


Photograph 2. Simulated westward view of the proposed project from SR 217 with visual simulation of the proposed industrial building and landscaping.

Figure 6.3-4 Alternative 2: Proposed and Simulated Views from Northbound SR 217

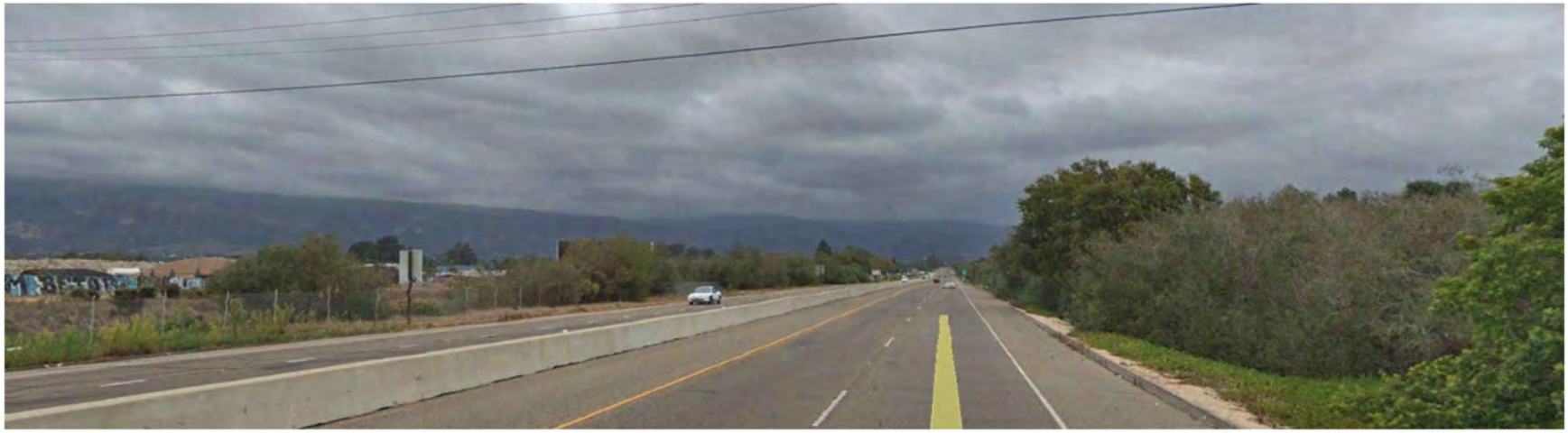


Photograph 1. Existing northbound view of the project site from SR 217. Existing drive-in theater structures on the project site are visible above the vegetation.

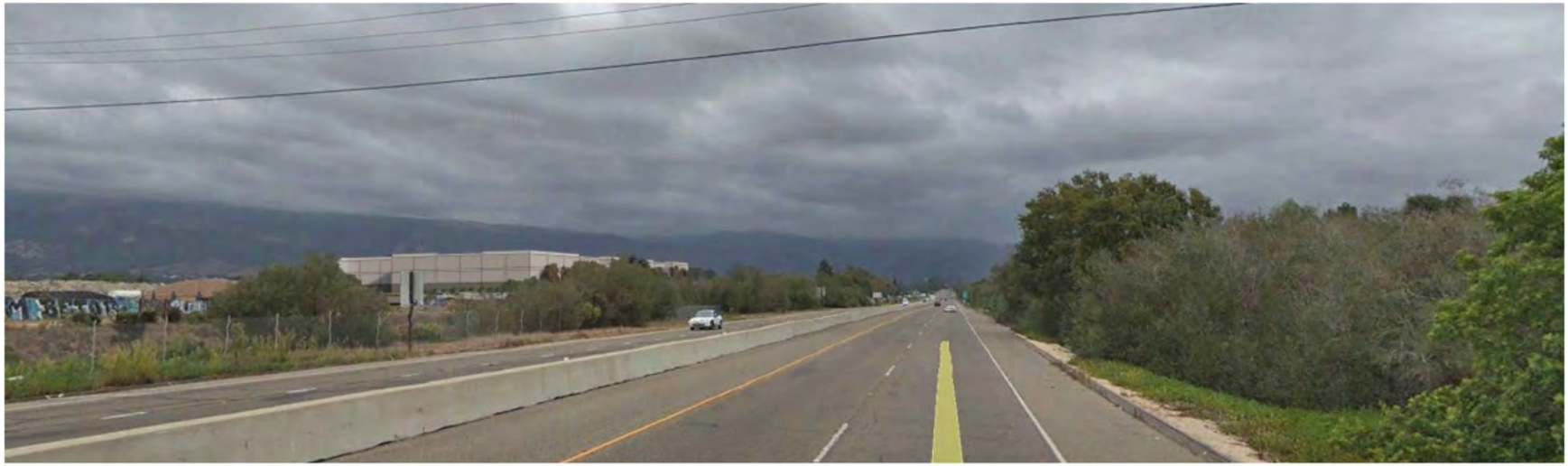


Photograph 2. Northbound view of Alternative 2 from SR 217 with visual simulation of the proposed industrial building.

Figure 6.3-5 Proposed Project: Proposed and Simulated Views from Northbound SR 217



Photograph 1. Existing northbound view of the project site from SR 217. Existing drive-in theater structures on the project site are visible above the vegetation.



Photograph 2. Northbound view of the proposed project from SR 217 with visual simulation of the proposed industrial building..

Figure 6.3-6 Alternative 2: Existing and Similated Views from Kellogg Avenue



Photograph 1. Existing southward view of the existing project site from Kellogg Avenue. The project site is directly visible from this roadway.



Photograph 2. Simulated southward view of Alternative 2 from Kellogg Avenue, including the visual simulation of the proposed building.

Figure 6.3-7 Proposed Project: Existing and Simulated Views from Kellogg Avenue



Photograph 1. Existing southward view of the existing project site from Kellogg Avenue. The project site is directly visible from this roadway.



Photograph 2. Simulated southward view of the proposed project from Kellogg Avenue, including the visual simulation of the proposed building.

Figure 6.3-8 Alternative 2: Existing and Simulated Views from South Fairview Avenue



Photograph 1. Existing eastward view of the existing project site from South Fairview Avenue. Vegetation completely obstructs views of the project site.



Photograph 2. Simulated eastward view of Alternative 2 from South Fairview Avenue, including the visual simulation of the proposed building.

Figure 6.3-9 Proposed Project: Existing and Simulated Views from South Fairview Avenue



Photograph 1. Existing eastward view of the existing project site from South Fairview Avenue. Vegetation completely obstructs views of the project site.



Photograph 2. Simulated eastward view of the proposed project from South Fairview Avenue, including the visual simulation of the proposed building.

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

Alternative 2 would be constructed on the same project site as the proposed project. The project site is approximately 0.9 mile south of U.S. 101, which is eligible for designation as a State Scenic Highway. Similar to the proposed project, given the distance of U.S. 101 from the project site, as well as the presence of intervening vegetation and structures, construction of the proposed industrial building under Alternative 2 would not substantially degrade views from U.S. 101. Alternative 2 would result in no impacts to scenic highways, which is the same as the proposed project.

Threshold: If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Alternative 2 would develop an approximately 70,594-square-foot industrial warehouse building on the project site. The building itself would have a height of 35 feet from finished grade, and the use of fill to elevate the structure would bring the total height of the structure to approximately 40 feet from existing grade. Alternative 2 landscaping would include approximately 106,520 square feet of the project site and would be comprised of native and climate-appropriate plantings within the proposed stormwater drainage basin and along the proposed parking lot, the driveway connecting to South Kellogg Avenue, and the exterior of the proposed industrial building. Landscaping would consist of native California riparian and upper wetland habitat within the SPA.

Similar to the proposed project, Alternative 2 would not obstruct or substantially degrade views of the Pacific Ocean, beach, or other coastal areas, as those scenic resources are currently not visible from the site and southward views are blocked by intervening buildings, SR 217, and vegetation. Therefore, Alternative 2 would not conflict with Section 30251 of the California Coastal Act, which requires that development projects in the Coastal Zone protect scenic and visual qualities, including views of the ocean and scenic coastal areas.

The proposed industrial building, which would include operational activities such as warehouse storage, wholesaling, and distribution, is considered a permitted use for the M-S-GOL zone under Section 35-84A of the City's previous Coastal Zoning Ordinance. The height of proposed industrial building would be approximately 40 feet when taking into account the amount of fill proposed to elevated the building out of the 100 year floodplain; however, the building would be 35 feet from finished grade. Therefore, the industrial building would not exceed 35 feet from finished grade, and would comply with the maximum height limitation for the M-S-GOL zone established in Section 35-84A of the previous Coastal Zoning Ordinance.

Although Alternative 2 would alter the site's existing visual character by introducing a new industrial building with associated site improvements, the proposed intensity and height of development would be generally consistent with the Goleta General Plan. For example, Alternative 2 would be consistent with Policy VH 4.6, Industrial Areas, which requires industrial development to include architectural detailing to break building massing; adequate lighting; protected bicycle parking; screened outdoor storage, maintenance, or trash areas; and buffers or screens to protect residential development from industrial land uses. Alternative 2 would comply with Policy VH 4.6 as it would use landscaping to screen the site from SR 217 and residential development, would provide sufficient parking (including bicycle spaces), would screen outdoor maintenance or trash areas, would provide adequate lighting in accordance with City requirements, and would include architectural detailing to break massing of the proposed industrial building.

However, Alternative 2 may obstruct scenic views of the Santa Ynez Mountains and foothills experienced by northward travelers along SR 217, a designated local scenic corridor. Alternative2 would be inconsistent with Goleta General Plan Policy VH 1.1, Scenic Resources, which identifies scenic resources in the City; Policy VH 2.2, Preservation of Scenic Corridors, which requires preservation of aesthetic qualities of scenic corridors; and Policy VH 2.3, Development Projects Along Scenic Corridors, which requires development adjacent to scenic corridors to not degrade or obstruct views of scenic areas. Therefore, Alternative 2 would have a potentially significant impact regarding conflict with applicable regulations that govern scenic quality, similar to the proposed project. Because there is no feasible mitigation to reduce the impact, impacts would be significant and unavoidable, similar to the proposed project.

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

Similar to the proposed project, construction of Alternative 2 is not anticipated to occur during evening or nighttime hours and would thus not introduce new light sources to the site during the construction time period. Consequently, the following discussion focuses on Alternative 2's operational impact involving light and glare.

Alternative 2 would introduce new sources of light from the parking lot and the proposed industrial building exterior once operational. Lighting would consist of a combination of exterior building-mounted wall packs as well as pole-mounted fixtures in the parking lot. All lighting would use light emitting diode (LED) fixtures and would include semi- and fully cut-off light fixtures. Alternative 2's lighting would be designed in accordance with City standards, including Goleta General Plan Policy 4.12, Lighting, which requires outdoor lighting fixtures to be designed, located, aimed downward or toward structures (if properly shielded), retrofitted if feasible, and maintained in order to prevent over-lighting, energy waste, glare, light trespass, and sky glow (City of Goleta 2006).

Alternative 2's design, including lighting, would be subject to Federal Air Regulations (FAR) Part 77, which requires projects that may affect navigable airspace to submit a Notice of Proposed Construction or Alteration. If a proposed development is identified as a presumed hazard, the Federal Aviation Administration (FAA) may require further aeronautical study or allow the project to be revised. The project applicant would be required to file a Notice of Proposed Construction or Alteration with the FAA regional office at least 30 days prior to construction. Based on Alternative 2's design, the FAA would then determine whether Alternative 2 poses a hazard to air navigation and could request changes to Alternative 2's design to minimize those hazards. The FAA would evaluate Alternative 2 against FAR Part 77 Section 77.17, which provides height standards to ensure Alternative 2 would not obstruct navigable airspace. Additionally, the FAA would provide lighting recommendations under FAR Part 77 Section 77.21 (d) [4]. Therefore, similar to the proposed project, Alternative 2 lighting would not be substantial to the extent that it would interfere with aviation activity and interfere with views.

Moving sources of light would come from the headlights of vehicles driving on roadways near the project site and entering or exiting the site early in the morning and evening. While Alternative 2's operation would involve vehicle travel, and thus potential light from vehicles, these lighting sources would be similar to existing conditions surrounding the site, as commercial and industrial vehicles are frequent in the area.

Alternative 2 would introduce new sources of glare in the form of focused, intense light from sunlight reflecting on the industrial building, parked car windows, or truck windshields when vehicles are backed up to loading docks. As the proposed industrial building would include light-colored exteriors

with elements of metal and glass, Alternative 2 has the potential to reflect sunlight and produce glare from this building. However, vegetative screening along the perimeter of the project site would reduce off-site impacts of glare from both the proposed building and from vehicles associated with building operation. Considering adjacent land uses include few glare-sensitive receptors, the potential for glare-related impacts would be limited. Overall, Alternative 2 would have a less than significant impact associated with light and glare, which would be similar to the proposed project.

b. Air Quality

Threshold: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Similar to the proposed project, Alternative 2 would involve the construction and operation of an industrial warehouse building. Alternative 2 does not propose residential uses and would not directly increase population growth. The Alternative 2 is estimated to add approximately 75 new employees. While these jobs would likely come from the local workforce, it is conservatively assumed that all 75 new employees would become new residents. In a conservative scenario, there would be a population growth of 198 based on the city's average persons per household of 2.64. Goleta has a current population of approximately 32,591 persons (California Department of Finance [DOF] 2022). The Santa Barbara County Association of Governments (SBCAG) growth forecast estimates that the population in Goleta would increase from an existing population of 32,591 residents to 34,700 residents by 2050. In addition, the growth forecast estimates that jobs would increase from 25,580 jobs in 2020 to 31,070 jobs by 2050. The population in Goleta would increase by 2,109 residents by 2050, and the jobs in Goleta would increase by 5,490 jobs by 2050. Therefore, the addition of 75 employees and 198 new residents to Goleta would be accommodated in the City's growth forecasts, and Alternative 2 would not exceed SBCAG's growth forecasts of population and jobs for Goleta (SBCAG 2019).

In addition, in accordance with standard practices in the City, Alternative 2 would follow SBCAPCD fugitive dust control measures from the SBCAG's *Scope and Content of Air Quality Sections in Environmental Documents*. For these reasons, Alternative 2 impacts would be less than significant, which would be similar to the proposed project.

Threshold: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Construction

Alternative 2 would involve temporary and short-term construction emissions similar to the proposed project. Construction activities such as demolition, grading, construction worker travel to and from the project site, delivery and hauling of construction supplies and debris to and from the project site, hauling of import soil to the site, and fuel combustion by on-site construction equipment would generate air quality emissions.

Table 6-2 summarizes construction emissions that would be generated from Alternative 2. Air quality modeling results for Alternative 2 are included in Appendix R-1. As shown in Table 6-2, construction emissions would not exceed the SBCAPCD construction thresholds used by the City of Goleta for this analysis. Therefore, Alternative 2 construction would not contribute substantially to an existing or

projected air quality violation and impacts would be less than significant, and similar to the proposed project.

Table 6-2 Estimated Alternative 2 Annual Construction Emissions

	Annual Emissions (tons per year)					
Construction Year	**ROC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2027	<1	1	1	<1	<1	<1
2028	<1	1	1	<1	<1	<1
Overlap						
Utility Pipelines	<1	1	1	<1	<1	<1
Maximum Annual Emissions	**1**	**2**	**2**	**<1**	**<1**	**<1**
Threshold	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: All emissions modeling was completed using CalEEMod. See Appendix R-1 for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulations (including SBCAPCD Rules 345, 323.1, and 329).

Operation

Operation of Alternative 2 would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Table 6-3 summarizes Alternative 2's operational emissions by emission source (area, energy, and mobile). As shown therein, the emissions generated by the operation of Alternative 2 would not exceed County operational thresholds used by the City of Goleta for this analysis. In addition, Alternative 2 operation would not contribute substantially to an existing or projected air quality violation and impacts would be less than significant, and the same as the proposed project.

Table 6-3 Estimated Alternative 2 Operation Emissions

	Maximum Daily Emissions (pounds per day)					
Emissions Source	**ROC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area	2	<1	3	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	1	3	<1	1	<1
Total	**3**	**1**	**6**	**<1**	**1**	**<1**
Threshold (area + energy + mobile)	55	55	N/A	N/A	80	N/A
Threshold Exceeded?	No	No	N/A	N/A	No	N/A
Threshold (mobile only)	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: All emissions modeling was completed using CalEEMod. See Appendix R-1 for modeling results. Some numbers may not sum precisely due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulations (including SBCAPCD Rule 323.1) and project design features. Emissions presented are the highest of the winter and summer modeled emissions.

Threshold: Would the project expose sensitive receptors to substantial pollutant concentrations

Construction

Alternative 2 construction activities would result in temporary project generated diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. Alternative 2 construction is anticipated to begin in July 2027 and end in September 2028. Construction would be phased, and each construction phase would be periodic and short-term. Construction-related toxic air contaminant (TAC) emissions would cease with the completion of construction activities. The detailed results of the construction health risk assessment (HRA) are provided in Appendix R-2 and summarized below.

The maximum unmitigated risk from construction of Alternative 2 sensitive receptors within 1,000 feet of the project site boundary as detailed in Appendix R-2. The maximum off-site residential cancer risk would be 0.86 in one million at one of the mobile homes east of the project site across SR-217. In addition, the chronic risk at the maximum off-site receptor would be exposed to a hazard index of 0.02. These maximum cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or hazard index of 1 for chronic risk. Given that neither the cancer risk nor the chronic risk would exceed regulatory thresholds, health risk from construction of Alternative 2 would be less than significant, and similar to the proposed project.

Operation

Alternative 2 would generate approximately 14 truck round trips per day (28 one-way trips) from the project site, which is the same as the proposed project. The truck trips are assumed to all be diesel-fueled heavy-heavy-duty truck trips. An operational HRA was performed to conservatively estimate health risk during the Alternative 2's operating hours. The maximum unmitigated risk from operation

of Alternative 2 would expose a sensitive receptor at the Winslowe townhomes to a cancer risk of 0.08 in one million, due to the receptor being adjacent to the truck route. In addition, the maximally exposed individual receptor chronic risk would have a hazard index of <0.0001. These cancer risks are the same as the proposed project's risk. These maximum operational cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or a hazard index of 1 for chronic risk. In addition, Alternative 2 would generate 14 round truck trips per day, well below the California Air Resource Board's (CARB's) threshold of 100 diesel-fueled truck trips per day. Therefore, Alternative 2 is consistent with CARB's siting recommendations for TAC emitting sources. Alternative 2 operations would not expose substantial TAC emissions to sensitive receptors and impact would be less than significant, and the same as the proposed project.

Combined Construction and Operation

The maximum unmitigated combined risk from construction and operation of Alternative 2 was identified for all sensitive receptors within 1,000 feet of the project site boundary and along the truck route on South Kellogg Avenue as detailed in Appendix R-2. The sensitive receptor across SR-217 at the mobile home park would be exposed to a cancer risk of 0.89 in one million. In addition, the residential receptor chronic risk would have a hazard index of 0.02. These maximum cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or 1 for chronic risk. Alternative 2 combined health risk would not exceed regulatory thresholds and impacts would be less than significant, and similar to the proposed project.

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

Alternative 2 would generate oil and diesel fuel odors during construction from equipment use. The odors would be limited to the construction period and would be intermittent and temporary. Furthermore, these odors would dissipate rapidly with distance from in-use construction equipment. Accordingly, construction of Alternative 2 would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people, and impacts would be less than significant, similar to the proposed project.

Alternative 2 includes an industrial warehouse and would not include industrial use development associated with odor complaints near sensitive receptors. In addition, it is likely that odors would not be distinguishable due to vehicle exhaust on State Route 217. Therefore, operation of Alternative 2 would not generate other emissions, such as those leading to odors, that would affect a substantial number of people. Operational odor impacts would be less than significant, similar to the proposed project.

c. Biological Resources

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

Belding's Savannah Sparrow and Nesting Birds

Alternative 2 would be located on the same project site as the proposed project and therefore would have a similar potential to directly or indirectly affect similar candidate, sensitive, and special-status

species. Foraging special-status birds, including the special-status Belding's savannah sparrow (BSS) and loggerhead shrike, have a low potential to be present as transients on the project site. Similar to the proposed project, Alternative 2 would not directly impact these species because they are mobile and would move away from construction or operational disturbance.

Although no BSS have been observed in the study area during field surveys, construction of Alternative 2 has the potential to indirectly impact BSS, in the event they are nesting in pickleweed habitat in Old San Jose Creek or San Jose Creek. Similar to the proposed project, Alternative 2 would have the potential to indirectly impact BSS due to disturbance from construction noise and vegetation clearing activities, which would be a potentially significant impact, requiring mitigation. In addition, construction of Alternative 2 has the potential to result in direct and indirect impacts to non-special status nesting birds protected under the Migratory Bird Treaty Act if they are nesting within the project site and/or immediate vicinity during construction activities. Direct impacts including the destruction of nests and mortality of eggs, nestlings, and birds would occur if active nests were present within the project site during clearing and grading. Indirect impacts could also occur if active nests are located in the project site and vicinity and are abandoned due to visual and acoustic construction -related disturbance. This impact would be potentially significant, requiring mitigation. Alternative 2 would require implementation of Mitigation Measures BIO-1 and BIO-2, which would establish avoidance buffers around nests during construction in the nesting season and require focused surveys and avoidance of BSS for ground disturbance during the BSS nesting season. With implementation of Mitigation Measures BIO-1 and BIO-2, Alternative 2 would have a less than significant impact on nesting birds, similar to the proposed project.

Similar to the proposed project, Alternative 2's operational noise would not result in excessive ambient noise and therefore would not indirectly disturb bird species. Similar to the proposed project, Alternative 2 would include landscaping consisting of native California riparian and upper wetland habitat which would provide visual screening from pickleweed habitat where the BSS could be present. Therefore, operation of Alternative 2 would have a less than significant impact on candidate, sensitive, and special-status species, similar to the proposed project.

Tidewater Goby and Steelhead

Similar to the proposed project, noise and vibration from construction of Alternative 2 could result in temporary impacts to individual tidewater gobies and steelhead. However, work within the San Jose Creek channel would be completed using hand tools and concrete saws and heavy vibration equipment would not be utilized which would minimize vibration from construction. Alternative 2 would require implementation of Mitigation Measure NOI-1, which requires use of a sound barrier at the edge of San Jose Creek. Implementation of this measure would minimize the potential for construction noise to disturb tidewater goby and steelhead, similar to the proposed project.

Construction of Alternative 2 would be carried out in accordance with a Storm Water Pollution Prevention Plan (SWPPP), which is required to include the use of best management practices (BMPs) to control stormwater pollutants. However, even with implementation of the SWPPP, construction of Alternative 2 could result in impact from fuel, oil, lubricants, paints, release agents, and other construction materials; erosion; increased turbidity; excessive sedimentation; and accidental fuel spills during construction could also lead to contamination of soils and habitat degradation. Alternative 2 would require implementation of Mitigation Measure BIO-3 which requires implementation of a Toxic Materials Control and Spill Response Plan for materials that may be used/stored on-site, such as petroleum-based products, fuel and lubricants, and other potentially toxic materials. Implementation of Mitigation Measure BIO-3 would reduce Alternative 2's potential

to impact tidewater goby and steelhead from the release of construction materials to a less than significant level, similar to the proposed project.

Similar to the proposed project, construction of Alternative 2's drainage outfall in the San Jose Creek Channel has the potential to directly affect aquatic habitat and species, including for tidewater goby and steelhead. Alternative 2 would require dewatering the work area which could injure or kill these species, or could increase turbidity and affect juvenile steelhead. Construction of Alternative 2's drainage outfall would take three to four weeks to complete and would be scheduled to avoid peak high tides if the Goleta Slough mouth is open. No heavy equipment would be used or operated within this staging area in the creek bed. Crews would use hand tools (i.e., shovels, rakes and brooms, dust pans, and wheelbarrows) to collect and remove any debris that falls or washes into the staging area. A crane would lower sandbags and plastic sheeting into the creek bed to create a temporary cofferdam to prevent water from entering the work area. The cofferdam used for Alternative 2 would be a physical barrier that would prevent high tides and aquatic species from entering the work area. Similar to the proposed project, installation of Alternative 2's cofferdam could potentially result in impacts to tidewater goby and steelhead if improperly installed. Alternative 2 would require implementation of Mitigation Measure BIO-3, which would ensure the cofferdam would be installed during the dry season and removed after concrete has cured prior to coming into contact with tidal surface water. With implementation of Mitigation Measure BIO-3, impacts associated with construction of Alternative 2's drainage outfall would be reduced to a less than significant impact on tidewater goby and steelhead, similar to the proposed project.

Alternative 2 would include two detention basins to retain stormwater flows and treat pollutants. Alternative 2's detention basins would total 17,625 square feet, which is 9,304 square feet larger than the proposed project's detention basin. Operation of Alternative 2 could result in similar impacts to San Jose Creek as the proposed project from the introduction of a new outfall structure and reduction in the stormwater flows into the creek from increased onsite detention. The detention basins would retain stormwater flows and treat pollutants in compliance with the County's adopted *Stormwater Technical Guide for Low Impact Development* guidelines which is designed to ensure post-construction requirements described in the Central Coast Regional Water Quality Control Board's (RWQCB) *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region* are satisfied. Implementation of Alternative 2 conducted in compliance with applicable regulatory requirements related to stormwater runoff would minimize the potential for pollutants to degrade water quality to a greater degree than the proposed project because of the additional square footage and treatment capacity of the detention basins. Operation of Alternative 2's drainage outfall would not affect the physical or biological habitat features essential to migrating adult steelhead (e.g., water quantity to allow for juvenile and adult mobility; cover, shelter, and holding areas; and adequate water quality) or the tidewater goby (e.g., water depth, substrate, and seasonally open sandbar mouth). No long-term effect would result to steelhead habitat since the in-creek work is the replacement of existing concrete in-kind, similar to the proposed project. Given the volume of water present in the creek during storm events, the size of the watershed, and volume of flood flows and daily tidal shifts (when the Goleta Slough mouth is open), Alternative 2's stormwater flows would not substantially impact tidewater goby and steelhead individuals or San Jose Creek habitat. The drainage outfall design would be subject to similar regulatory requirements as the proposed project, such as United States Fish and Wildlife Service (USFWS) and National Marines Fisheries Service (NMFS) consultation, and United States Army Corps of Engineers (USCACE) 404 Certification. Similar to the proposed project, compliance with required permits would reduce Alternative 2's operational impact to tidewater goby and steelhead to a less than significant level.

California Red-Legged Frog and Western Pond Turtle

Due to similar construction activities as the proposed project, construction of Alternative 2 would have a potential to kill or injure California red-legged frog and western pond turtle. If present, injury or mortality could occur through accidental crushing, either by construction equipment or foot traffic from workers. Displacement from cover due to construction could expose these species to predators and desiccation. Additionally, amphibians or reptiles moving through the construction area could become trapped in open trenches left overnight. The initial construction noise and disturbance may also indirectly impact species, if present in the San Jose Creek and Old San Jose Creek corridor, by altering their migration behaviors. Alternative 2 would require implementation of Mitigation Measure BIO-4 and BIO-5, which would require preconstruction surveys and biological monitoring throughout construction and avoidance and relocation of California red-legged frog and western pond turtle, if found. With implementation of Mitigation Measure BIO-4, Alternative 2's construction impacts to California red-legged frog and western pond turtle would be reduced to a less than significant level, similar to the proposed project.

Operation of Alternative 2 and the proposed project would not occur within California red-legged frog or western pond turtle habitat and would be limited to the developed portion of the project site. Therefore, operation of Alternative 2 would have a less than significant impact on California red-legged frog and western pond turtle, similar to the proposed project.

Insects and Bats

Construction of Alternative 2 has a similar potential as the proposed project to result in direct effects to special-status insects (monarch butterfly and Crotch bumble bee) if present during vegetation clearing. The potential is low that either the foraging monarch butterfly or Crotch bumble bee would be present at the initiation of construction since the coastal sage scrub foraging habitat on-site lacks preferred host plants, the site is limited in size, was previously developed, and surrounded by disturbance. Furthermore, due to the expanse of food sources and habitat south of the project site in the Goleta Slough and along the coast, the removal of marginal disturbed native shrubland would not substantially impact regional nectar sources. Alternative 2's operation would not affect these insect species given that noise and dust would not be above existing ambient levels, lighting would be shielded, and vegetative screening would reduce glare. Therefore, Alternative 2 would have a less than significant impact on special-status insects, similar to the proposed project.

Special-status bat species (Pallid bat, Townsend's big-eared bat, Western red bat, and Western mastiff bat) have a low potential to forage over the project site. Alternative 2's construction would not interfere with nocturnal foraging behavior by bats as no nighttime construction would be required. Existing project site buildings are sealed and maintained and are not expected to host bat roosts; therefore, demolition would not directly impact bat roosts. Because of the low potential for bats to occur at the project site, Alternative 2 would have a less than significant impact on special-status bats, similar to the proposed project.

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

Alternative 2 would be located on the same project site as the proposed project and therefore would include similar vegetation in the disturbance area. No sensitive communities are present on the project site; therefore, Alternative 2 would not result in direct impacts on sensitive communities or Environmentally Sensitive Habitat Area (ESHA) communities.

Sensitive communities and ESHA that could be indirectly affected are found in San Jose Creek and Old San Jose Creek. Alternative 2's construction activities could result in similar dust generation, introduction of fuel spills, and introduction of invasive species as the proposed project which could indirectly impact sensitive communities and ESHA communities adjacent to the project site. Dust impacts would be addressed through adherence to Santa Barbara County Air Pollution Control District requirements. Alternative 2's fuel spill impacts would be reduced to a less than significant level with implementation of Mitigation Measure BIO-3, similar to the proposed project. Similar to the proposed project, Alternative 2's potential impacts related to invasive species would be reduced to a less than significant level with implementation of Mitigation Measures BIO-5, BIO-6, and BIO-7, which requires biological monitoring, prohibits non-native invasive species from being used as landscaping, and requires implementation of an Invasive Species Control Plan, respectively.

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

Alternative 2 would include similar construction activities as the proposed project and would therefore have a similar potential to result in temporary impacts to jurisdictional wetland features. Construction of the drainage outfall and use of cofferdam could damage wetlands habitat; however, Alternative 2 would require implementation of Mitigation Measure BIO-3 which would ensure construction of the drainage outfall and use of the cofferdam occurs during the dry season. Implementation of Mitigation Measure BIO-3 would reduce Alternative 2's indirect construction impacts on wetlands to a less than significant level. Implementation of Mitigation Measure BIO-5, requiring construction monitoring with 100 feet of ESHA, and Mitigation Measure BIO-8, requiring the construction contractor to install fencing around the ESHA and requiring replacement of ESHA habitat if temporary or permanent impacts occur during construction, would reduce Alternative 2's potential to directly impact wetlands to a less than significant level. Implementation of Mitigation Measures BIO-6 and BIO-7, prohibiting invasive and exotic species, would reduce Alternative 2's potential impacts to wetlands due to the introduction of invasive species to a less than significant level, similar to the proposed project.

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

Alternative 2 would be located at the same project site as the proposed project and therefore would have a similar potential to result in interference with fish and wildlife migration. Construction of Alternative 2 would adhere to typical working hours and noise would not affect terrestrial nocturnal mammal wildlife movement, which is most pronounced during dusk, nighttime, and dawn.

Approximately 170 feet west of the project site, Old San Jose Creek is mapped as a wildlife migration corridor for terrestrial and avian species. The Old San Jose Creek corridor is 300 feet from the structure in the development area and 40 feet from the utility trenching and would be subject to at least 75 decibels[2] of construction noise. Alternative 2's construction noise would generate similar noise at Old San Jose Creek as the proposed project, which would not result in a significant impact to Old San Jose Creek avian habitat within 300 feet of project construction during breeding season. Outside the breeding season, the initial increase in construction noise would cause bird species to

[2] Based on a 400-foot distance to 908 South Kellogg Avenue under Section 4.11 Table 4.11-7 and this distance under Table 4.11-11 in Section 4.11, *Noise*.

permanently relocate to adjacent habitat, where they would not be affected by construction noise. Alternative 2 would implement Mitigation Measure NOI-1 which would reduce short-term noise construction impacts to wildlife movement in the San Jose Creek to a less than significant level. Alternative 2 would require implementation of Mitigation Measure BIO-1, which would reduce potential impacts to migratory birds to a less than significant level, similar to the proposed project. Therefore, similar to the proposed project, construction of Alternative 2 would have a less than significant impact on migration with mitigation incorporated.

Alternative 2 would create similar operational noise at the project site. Similar to the proposed project, operational noise would not substantially impact wildlife. Due to the vegetation buffers between the San Jose Creek and the industrial building, Alternative 2 would not substantially impact wildlife movement due to the introduction of the new uses and human presence. As with the proposed project, Alternative 2's lighting would be contained on the project site and therefore would not substantially interfere with wildlife movement in San Jose Creek or Old San Jose Creek due to lighting. Due to Alternative 2's increase in proposed landscaping, Alternative 2 has a marginally greater potential to result in adverse effects on wildlife and habitat from the use of pesticides (including rodenticides), herbicides, and fertilizers, compared to the proposed project. Alternative 2 would require implementation of Mitigation Measures BIO-6, BIO-7, and BIO-9, which would reduce Alternative 2's impact on migratory wildlife from landscaping to a less than significant level, similar to the proposed project.

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

Similar to the proposed project, Alternative 2 would be consistent with General Plan Policies CE 2, CE 3, CE 5, CE, 6, and CE 8 with implementation of Mitigation Measures BIO-1 through BIO-9. The City's Conservation Element Policy CE 2.2, *Stream Protection Areas* requires a 100-foot setback in San Jose Creek and portions of Old San Jose Creek. Unlike the proposed project which includes a 25-foot SPA buffer, Alternative 2 would include a 100-foot SPA buffer consistent with Policy CE 2.2. Development within the 100-foot SPA buffer would be limited to access road improvements, installation of the underground utility trench, and the addition of landscaping, which are allowed uses in the SPA. Accordingly, Alternative 2 would not result in disturbances to wildlife associated with the reduction in SPA buffer that would occur with the proposed project. Furthermore, Alternative 2 would allow for restoration of San Jose Creek in compliance with Policy CE-2.6. Therefore, Alternative 2 would reduce the proposed project's significant and unavoidable impact related to conflicts with Policy CE 2.2 to a less than significant level.

Threshold: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Alternative 2 would be located on the same project site as the proposed project. The project site is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. Therefore, Alternative 2 would have no impact related to conflicts with these plans, which is the same as the proposed project.

d. Cultural Resources

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

Alternative 2 would be located on the same project site as the proposed project and remove the same structures, including the Twin Screens Drive-In theater. According to the *Historic Resources Technical Report*, the Twin Screens Drive-In theater is ineligible for historic resource listing. Therefore, no historical resources are present on the project site. Alternative 2 would have no impact on historical resources, which is the same as the proposed project.

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

Alternative 2 would be located on the same project site as the proposed project. The 2017 *Archaeological Resources Assessment* completed to evaluate the project site concluded there is no potential for archaeological cultural resources to exist within the project site. Alternative 2 would not substantially affect archaeological resources, and this impact would be less than significant, which is the same as the proposed project.

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

Because Alternative 2 would be located on the same project site as the proposed project, Alternative 2 would have a similar, low likelihood of encountering human remains. In the event of unanticipated discovery of human remains during construction, the construction contractor would be required to comply with the State of California Health and Safety Code Section 7050.5 which requires that all construction activities halt in the vicinity of the discovery and the County Coroner be contacted immediately. The County Coroner would make a determination of origin and disposition of the human remains pursuant to Public Resources Code Section 5097.98, including identification of a most likely descendent to provide recommendations if human remains are determined to be prehistoric. With compliance with existing regulations prescribed in the State of California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8, Alternative 2's impacts to human remains would be less than significant, which is the same as the proposed project.

e. Energy

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

Construction

Alternative 2 would include similar components as the proposed project and would be constructed on the same project site as the proposed project. Alternative 2 would involve the same project phases and construction schedule as the proposed project; however Alternative 2 would include import of an additional 1,200 cubic yards of soil. This would marginally increase Alternative 2's diesel consumption in comparison to the proposed project (approximately 39,310 gallons of diesel fuel use in comparison to the proposed project's approximately 39,306 gallons of diesel fuel use) (Appendix R-3). Similar to the proposed project, Alternative 2's fuel use during construction represents

approximately 0.002 percent of the annual gasoline use and approximately 0.2 percent of the annual diesel use in Santa Barbara County (See Table 4.5-1 in Section 4.5, *Energy)*. During construction of Alternative 2, contractors would be required to comply with the provisions of the California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Heavy-duty equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Although Alternative 2 would use slightly more diesel fuel than the proposed project, adherence to regulatory requirements would ensure construction of Alternative 2 would not involve the wasteful, inefficient, or unnecessary use of energy, and impacts would be less than significant, similar to the proposed project.

Operation

Alternative 2 would include the same components as the proposed project, including the 70,594 square foot industrial building, and be located on the same project site as the proposed project but in a different configuration. Therefore, operation of Alternative 2 would utilize an equal amount of energy resources (approximately 13,964 gallons of gasoline, 5,546 gallons of diesel, 788 megawatts of electricity, and 1,394 therms of natural gas annually) as the proposed project. This fuel use represents approximately 0.01 percent of the annual gasoline use, 0.03 percent of annual diesel use, 0.02 percent of annual electricity use, and 0.001 percent of natural gas use in Santa Barbara County (See Table 4.5-1, Table 4.5-2, and Table 4.5-3 in Section 4.5, *Energy*). Similar to the proposed project, Alternative 2's electricity would be supplied by 3CE using 100 percent renewable energy sources. Similar to the proposed project, Alternative 2 would comply with standards set in California Building Code Title 24, including the California Green Building Code (CALGreen) Standards and the California Building Energy Efficiency Standards. Compliance with these standards would minimize Alternative 2's potential to result in the wasteful, inefficient, or unnecessary consumption of energy. During operation, trucks entering and existing the project site would limit idling to five consecutive minutes in accordance with California Code of Regulations Title 13 Section 2485 which would minimize energy use of trucks entering and exiting the project site. With the implementation of applicable energy efficiency measures, Alternative 2 would minimally increase energy demand and petroleum demand due to the development of Alternative 2, compared with existing conditions. Operation of Alternative 2 would not result in substantial adverse environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant, and the same as the proposed project.

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

The City's Climate Action Plan (CAP), Strategic Energy Plan, General Plan, and Municipal Code contain measures intended to increase energy efficiency and expand the use of renewable energy in Goleta. Similar to the proposed project, Alternative 2 would comply with CALGreen and the Building Energy Efficiency Standards. Alternative 2 would include LED lighting, and indoor water use efficiency measures to limit the energy consumption necessary for operation of Alternative 2 and assist to meet the City's renewable energy goals. Furthermore, Alternative 2 would be supplied electricity by 3CE using 100 percent renewable energy sources consistent with the measures of the CAP, Strategic Energy Plan, General Plan, and Municipal Code to expand the use of renewable energy in Goleta.

Alternative 2's design includes 92 parking spaces, and 9 EV spaces. The CALGreen intervening code update, which went into effect July 1, 2024, requires nonresidential development providing between

76-100 parking spaces to provide a minimum of 17 electric vehicle (EV) capable parking spaces with 4 parking spaces including EV supply equipment. In addition, the City's EV Reach Code for new construction would require Alternative 2 to provide a minimum of 40 EV-capable parking spaces with 13 parking spaces including EV supply equipment, which are less EV spaces than that required the proposed project. The EV Reach Code was adopted by the City Council on September 17, 2024; therefore, the project applicant would be required to install the additional EV parking infrastructure in order to comply with the EV Reach Code. Accordingly, Alternative 2 would not conflict with state or local EV parking requirements, similar to the proposed project.

Similar to the proposed project, Alternative 2 would also include bicycle parking space and would connect to existing bicycle facilities in Goleta, encouraging the use of alternative modes of transportation and a reduction in vehicle fuel consumption. These design features would ensure Alternative 2 would not conflict with or obstruct the City's CAP, Strategic Energy Plan, General Plan, or Municipal Code. As stated above, Alternative 2, similar to the proposed project, would be supplied electricity by 3CE using 100 percent renewable electricity which would ensure consistency with the requirements of Senate Bill 100. Therefore, Alternative 2 would have a less than significant impact related to conflicts with or obstruction of a state or local plan for renewable energy or energy efficiency, similar to the proposed project.

f. Geology and Soils

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

Alternative 2 would be located on the same project site as the proposed project and therefore would have a similar impact related to geologic hazards, including fault rupture, as the proposed project. No active or potentially active faults are located on the project site, and therefore the potential for surface fault rupture to occur is low. Therefore, Alternative 2 would have no impact involving fault rupture, which is the same as the proposed project.

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

The project site is located in a region of high seismic activity, with the potential for large seismic events that could generate strong ground shaking. Alternative 2, similar to the proposed project, would be designed to consider seismic loads, as required by the California Building Code (CBC). Alternative 2 would also require implementation of Mitigation Measure GEO-1, which would require incorporation of building foundation recommendations into the design of Alternative 2 in order to reduce adverse effects associated with future groundshaking events. Implementation of Mitigation Measure GEO-1 would reduce Alternative 2's impact related to seismic ground shaking to a less than significant level, similar to the proposed project.

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

and

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

The project site is not at risk of landslides, lateral spreading, or collapse. Both liquefaction and settlement are potential concerns for project site soils. During an earthquake-induced liquefaction event, the total vertical movement of the ground surface could reach approximately 4 inches, while the variation in settlement between different areas or structures within the affected zone could be up to approximately 2 inches. Additionally, if dry sand on the project site is subjected to seismic activity, the total vertical movement of the ground surface could reach approximately 2 inches. Similarly, the variation in settlement between different areas or structures within the affected zone could be up to approximately 1 inch. As with the proposed project, settlement resulting from liquefaction and seismic activity may damage Alternative 2's building foundation. Alternative 2 would require implementation of Mitigation Measure GEO-1, which would reduce Alternative 2's potential impacts due to liquefaction resulting in settling of soils on the project site to a less than significant level, similar to the proposed project.

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

The project site is not located in a landslide hazard area and is not subject to landslide risk. Alternative 2 would have no impact involving landslides, which is the same as the proposed project.

Threshold: Would the project result in substantial soil erosion or the loss of topsoil?

Construction

Project site soils are highly erodible. Alternative 2's grading operations would disturb 0.12-acre greater during construction in comparison to the proposed project. If grading activities occur during the rainy season, or in the event of heavy storms, soils from the site could be entrained, eroded, and transported off-site.

Similar to the proposed project, construction of Alternative 2 would comply with the requirements of the Construction Stormwater General Permit and the construction contractor would implement a SWPPP to control the discharges of pollutants, including sediment, into local surface water drainages. The SWPPP prepared for Alternative 2 would include information on BMPs that would be used during construction to retain sediment on-site, minimize erosion, and utilize vegetation for erosion control, as well as a summary of precautionary measures to be taken to ensure vehicle use does not result in erosion, pursuant to the requirements of Chapter 15.09 of the City's Municipal Code. As with the proposed project, soils on the project site are highly erodible and construction of Alternative 2 could result in substantial erosion. Alternative 2 would require implementation of Mitigation Measure GEO-1 which would require incorporation of drainage and grading recommendations into Alternative 2 to reduce soil erosion on-site. Similar to the proposed project, Alternative 2's construction-related impacts to soil erosion would be less than significant with mitigation incorporated.

Operation

During operation of Alternative 2, runoff generated from storm events may transport sediment off-site and contribute to project site erosion and the loss of topsoil. However, similar to the proposed project, Alternative 2's design would be required to meet the same regulatory requirements as the proposed project to reduce erosion. These requirements include the standards of the Central Coast Regional Water Quality Control Board's (RWQCB) *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region and the County's Stormwater Technical Guide for Low Impact Development*. Alternative 2 would comply with the Phase II Municipal Separate Storm Sewer System (MS4) Permit which requires that a Storm Water Quality Management Plan (SWQMP) be prepared for projects that create and/or replace 5,000 or more square feet of impervious surface. SWQMPs specify the operational BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. However, soils on the project site would remain highly erodible, requiring implementation of long-term maintenance activities to ensure proper drainage and the stabilization of surface soils are necessary to reduce the potential of erosion damage during operation. Alternative 2 would require implementation of Mitigation Measure GEO-1 which would incorporate drainage and grading recommendations into Alternative 2. Similar to the proposed project, Alternative 2's operational impacts related to soil erosion would be less than significant with mitigation incorporated.

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

Soils on the project site are non-expansive. Alternative 2 would not create substantial direct or indirect risks to life or property due to expansive soils and no impact would occur, which is the same as the proposed project.

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

Similar to the proposed project, Alternative 2 would include an underground sewer line that would connect to an existing sewer line located underneath South Kellogg Avenue. Sewer services at the project site would be provided by the Goleta Sanitary District. Alternative 2 would not involve the use of septic tanks or alternative wastewater disposal systems and, as with the proposed project, no impact would occur.

Threshold: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are no documented paleontological resources at the project site. The project site is primarily underlain by fill soils that reach approximately 4 feet in depth. The geologic unit that underlies the project site, Holocene and upper Pleistocene (Quaternary-era) alluvium and colluvium (Qac), has a low paleontological sensitivity. Similar to the proposed project, grading activities for Alternative 2 would be unlikely to encounter previously unidentified paleontological resources due to the low paleontological sensitivity of the geologic unit underlying the project site. Accordingly, Alternative 2 would have a less than significant impact on paleontological resources, similar to the proposed project.

g. Greenhouse Gas Emissions

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

Construction Emissions

Alternative 2 construction would generate temporary GHG emissions from operation of construction equipment on-site, and vehicles transporting construction workers to and from the project site and heavy trucks to transport soil import, building, concrete, and asphalt materials. As shown in Table 6-4, construction associated with Alternative 2 would generate 602 MT of CO_2e, an increase of 3 MT of CO_2e compared to construction of the proposed project. Amortized over a 50-year period, construction associated with the Alternative 2 would generate 12 MT of CO_2e per year, similar to the proposed project. Greenhouse gas modeling results for Alternative 2 are included in Appendix R-1.

Table 6-4 Construction GHG Emissions – Alternative 2

Year	Emissions (MT of CO_2e)
2027	271
2028	205
Utility Pipelines	126
Total	**602**
Amortized over 50 years	**12**

MT = metric tons; CO_2e = carbon dioxide equivalents

Source: CalEEMod worksheets in Appendix R-1. See Table 2.3, "Construction Emissions by Year, Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

Alternative 2 GHG emissions from worker trips to and from the site would be approximately 0.4 MT of CO_2e per year when amortized over the project life. In other words, construction worker trips would represent less than four percent of the total construction emissions. Therefore, GHG emissions from worker trips during construction activity would be minimal.

Operation and Total Emissions

Operation of Alternative 2 would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips (employee and warehousing activities), and wastewater and solid waste generation. The implementation of nine EV charging stations would reduce gasoline GHG emissions per year, as shown in Table 6-5. Approximately 352,125 VMT per year would be reduced from the nine EV charging stations. Alternative 2's gasoline GHG emissions would be approximately 81 MT of CO_2e per year[3] (based on employee and warehousing activities), and the GHG emissions from electric vehicles would be approximately 0 MT of CO_2e per year, since Alternative 2 would be supplied with 100 percent carbon free electricity from 3CE Prime option. Therefore, installing nine parking spaces with EV charging stations would reduce

[3] GHG emissions from gasoline vehicles = (352,125 reduced VMT per year*229 grams of CO_2e per mile*1^{-6} MT per gram)

mobile GHG emissions by 81 MT of CO_2e per year.[4] Annual operational emissions resulting from Alternative 2 are summarized in Table 6-5, and are the same as the proposed project.

The annual operational GHG emissions are combined with the amortized construction emissions. Alternative 2 would emit approximately 133 MT of CO_2e per year or 1.77 MT of CO_2e per employee per year (for 75 employees), which is similar to the proposed project. Therefore, Alternative 2 would not exceed the County's Environmental Thresholds and Guidelines Manual GHG efficiency threshold for a nonresidential use of 2.63 MT CO_2e per employee per year. Therefore, Alternative 2 would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and impacts would be less than significant, and similar to the proposed project.

Table 6-5 Combined Unmitigated Annual GHG Emissions – Alternative 2

Emission Source	Annual Emissions (MT CO_2e)
Construction[1]	**12**
Operational	**121**
Area	1
Energy	7
Mobile	156
EV Charging Stations	(81)
Solid Waste	21
Water, Wastewater	17
Total	**133**
Total GHG per Service Population[2]	**1.77**
Santa Barbara County GHG Service Population Criterion for Nonresidential Land Uses	**2.63 MT of CO_2e per service population per year**
Exceeded?	**No**

MT CO_2e = metric tons of carbon dioxide equivalent.

Note: parenthetical values are negative numbers and are subtracted from the total emissions rather than added.

Source: CalEEMod worksheets and EV charging station worksheets are in Appendix R-1. See Table 2.6 "Operations Emissions by Sector, Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

[1]Construction emissions were amortized by 50 year project lifetime.

[2]The project would add approximately 75 employees.

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

2022 Scoping Plan

The State's 2022 Scoping Plan aims to achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. The Scoping Plan's Appendix D, Local Actions, provides suggestions for on-site GHG-reducing design features, methods to reduce VMT and

[4] Alternative 2 would be required to comply with the City of Goleta's EV Reach Code for new construction, which was adopted by the City Council on September 17, 2024. The EV Reach Code would require Alternative 2 to provide a minimum of 40 EV-capable parking spaces with 13 parking spaces including electric vehicle supply equipment. The greenhouse gas emissions analysis assumes that Alternative 2 would include 9 EV spaces, and therefore presents a conservative analysis.

support building decarbonization, access to shared mobility services or transit, and EV charging. It does not address other land use types such as industrial. The Scoping Plan's Transportation Electrification priority area supports an EV fleet, which Alternative 2 would allocate at least nine EV charging stations, and would be served by 3CE Prime option, which would supply 100 percent carbon free electricity to the project site. The Scoping Plan's VMT Reduction priority area supports increased access to public transit and walking, development located on infill sites, and development that does not result in the loss or conversion of natural and working lands. Alternative 2 is an infill development in an urban area that would not convert natural lands and would contribute to the job and housing balance. The City anticipates residential and work-based projects in these areas would generate low VMT because of the higher density of existing residential and commercial uses and increased transit access relative to other areas of the City. These features allow for shorter vehicle trip lengths and promote the use of alternative transportation in these areas. In addition, Alternative 2 would implement ten bicycle parking spaces to promote alternative modes of transportation. Alternative 2 would be consistent with the State's long-term climate goals of carbon neutrality by 2045, similar to the proposed project.

SBCAG 2050 RTP/SCS

The SBCAG 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) demonstrates that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years. The Environment Objective 1 of the RTP/SCS is to "promote better balance of jobs and housing to reduce long-distance commuting." Alternative 2 would site new jobs within close proximity to residents within the urban boundary of Goleta and therefore would be consistent with Objective 1. Furthermore, in support of Environment Objective 5 of "reduce vehicle miles traveled," the surrounding area is anticipated to generate low VMT because of the higher density of existing residential and commercial uses and increased transit access near the site. Therefore, these features would allow for shorter vehicle trip lengths and promote alternative modes of transportation, such as bicycling and transit. Alternative 2 would be consistent with the 2050 RTP/SCS, similar to the proposed project.

City of Goleta General Plan

The City General Plan addresses recently emerging topics of climate change and alternative energy. The General Plan lists several policies as part of its Transportation and Conservation Element that support GHG emission reductions. Alternative 2 would be consistent with Policy CE-15.3 of the Conservation Element by incorporating water efficient appliances to reduce water consumption for landscaping, plumbing, and irrigation consistent with the latest Title 24 Green Building Code and Building Energy Efficiency Standards. In addition, the Alternative 2 would be consistent with the City's Policy TE-1.1, Alternative Modes, by incorporating ten bicycle parking spaces, which could promote alternative modes of transportation for the residential uses within half a mile of the site. In addition, Alternative 2 site is within half a mile of the Santa Barbara Metropolitan Transit District Route 6 and 11 on Fairview Avenue west of Alternative 2 site. Therefore, Alternative 2 would be consistent with the goals and policies in the General Plan to increase water efficiency, and potentially reduce the amount of motor trips with connectivity to surrounding neighboring residents, similar to the proposed project.

City of Goleta Climate Action Plan

The City's CAP contains policies and programs targeting energy efficiency policy. Alternative 2 would be consistent with the CAP measures, such as building designed and equipped with features that

conserve and reduce energy consumption. Alternative 2 would be consistent with the latest Title 24 Building Energy Efficiency Standards for solar readiness for nonresidential land uses, which would align with Policy RE-1. In addition, Alternative 2 would construct ten bicycle parking spaces, which could promote alternative modes of transportation with several residential uses within half a mile of the site, aligned with Policy T-8 of City's CAP. Alternative 2 would be consistent with the goals outlined in the CAP, similar to the proposed project

h. Hazards and Hazardous Materials

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

Construction

Construction of Alternative 2 would result in similar temporary increases in the regional transport, use, and disposal of construction-related hazardous materials and petroleum products as the proposed project. These activities would be subject to applicable federal, State, and local regulations established by the United States Environmental Protection Agency (U.S. EPA), State of California, the County of Santa Barbara, and the City of Goleta for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. During construction of Alternative 2, existing on-site hazardous materials and waste would also be carried out in compliance with applicable federal, State, and local regulations, which would minimize potential impacts associated with the transport and disposal of these substances. Additionally, compliance with the Construction Stormwater General Permit would require implementation of Good Housekeeping BMPs to reduce potential impacts associated with hazardous materials spills. Similar to the proposed project, compliance with existing regulations governing transport, use, and disposal of hazardous materials would ensure construction of Alternative 2 would have a less than significant impact related to the routine transport, use, or disposal of hazardous materials during construction.

Operation

Alternative 2 would consist of an industrial warehouse building used for a variety of conforming uses allowed with the project site's M-S-GOL and M-1 zones. Similar to the proposed project, Alternative 2's industrial building could be leased to multiple tenants, whose operations could involve the transport, use, and disposal of hazardous materials for routine maintenance. all hazardous material transport, use, or disposal associated with the proposed industrial warehouse and office space would comply with existing hazardous materials regulations established by the U.S. EPA, the State of California, the County of Santa Barbara, and the City of Goleta. These regulations prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce risk of spills. Similar to the proposed project, compliance with these regulations would ensure Alternative 2's operational impacts related to the transport, use, and disposal of hazardous materials would be less than significant.

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

Construction

The project site contains existing drive-in theater structures which may contain asbestos-containing materials (ACM) and lead-based paints (LBP), and which would be demolished as part of Alternative 2. Demolition and construction activities would be required to adhere to Cal/OSHA regulations regarding asbestos and lead-based paint materials. The California Code of Regulations (CCR) requires testing, monitoring, containment, and disposal of lead-based materials (CCR Title 8, Section 1532.1) and asbestos (CCR Title 8, Section 15129). However, given the likelihood for the presence of ACM and LBP, demolition could result in a potentially significant release of ACM and LBP. Alternative 2 would require implementation of Mitigation Measures HAZ-1 and HAZ-2 in order to reduce potential impacts associated with ACM and LBP release to a less than significant level, similar to the proposed project.

Although the *Environmental Soils Analysis* prepared for the proposed project found that constituents of concern were not detected in project site soil samples at concentrations that exceed regulatory thresholds (Appendix O), there remains a potential that surficial soils to the west of the existing concessions stand could contain hazardous materials, should they exist in project site fill. The *Environmental Soils Analysis* concluded that the soil contamination is limited to the upper few inches in this location. In addition, adjacent properties to the north of the project site have handled or generated hazardous waste, with one property located at 891 South Kellogg Avenue (approximately 100 feet north of the project site) associated with two closed Cleanup Program cases (Appendix I). Past hazardous material releases from adjacent properties may have resulted in contaminated groundwater on the project site. Construction could potentially disturb hazardous materials in surficial soil to the west of the existing concession stand, leading to an accidental release of hazardous materials that could impact both construction workers and the environment. In addition, based on the depth to groundwater, it is reasonable to assume that groundwater could be encountered during grading activities and groundwater dewatering would be required during construction. Similar to the proposed project, Alternative 2 would comply with an individual NPDES permit, waste discharge, or Limited Threat Discharge Permit, to ensure proper treatment and disposal. However, given the likelihood for contamination, Alternative 2 would require implementation of Mitigation Measure HAZ-3 through HAZ-5 which, similar to the proposed project, would reduce potential impacts associated with the accidental release of hazardous materials to a less than significant level.

Operation

Similar to the proposed project, operation of Alternative 2 would involve the minimal transport, use, and disposal of hazardous materials used for routine maintenance and would not store large quantities of hazardous materials within the industrial building. However, Alternative 2's operational activities would comply with applicable federal, State, and local regulations, which prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce the risk of accidental spills. Therefore, operation of Alternative 2 would have a less than significant impact related to the accidental release of hazardous materials, similar to the proposed project.

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

The project site is not located within 0.25-mile of an existing or proposed school. Therefore, Alternative 2 would have no impact associated with emissions of hazardous materials, substances, or wastes within 0.25 mile of a school, which is the same as the proposed project.

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

There are no hazardous materials sites mapped within the project site. As such, Alternative 2 would not create a significant hazard to the public or the environment due to hazardous materials sites. No impact would occur, which is the same as the proposed project.

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

The Santa Barbara Municipal Airport is located approximately 0.25 mile west of the project site. The northern portion of the project site is located within the Clear Zone of the Santa Barbara Airport and the entire project site is within the Airport Influence area of the Santa Barbara Municipal Airport. In addition, the project site falls within the 20,000-foot Federal Air Regulations (FAR) Part 77 Notification Area for the Santa Barbara Municipal Airport.

Alternative 2 would comply with the same regulations as the proposed project, including the 1993 Santa Barbara County Airport Land Use Plan (ALUP) development standard of a maximum intensity of 25 people per acre and the height restrictions of FAR Part 77. According to the 1993 Santa Barbara County ALUP, the project site is located within Airport Safety Zone II within the Airport Influence Area. The northern portion of the project site is located within Safety Area 1 (Clear Zone) and the southern half of the project site is located within Safety Area 3 (General Traffic Pattern Zone). The more restrictive development standards of Safety Area 1 apply to Alternative 2. Therefore, the ALUP development standard of a maximum intensity of 25 people per acre, as a site-wide average, would apply to Alternative 2. Alternative 2's industrial building would employ 75 people daily, and would occupy approximately 1.62 acres of the total 11.77-acre project site, which represents an intensity of 6.37 people per acre. Therefore, development under Alternative 2 would comply with the standard specified in the 1993 Santa Barbara County ALUP, similar to the proposed project. The project site is located in the 60-65 dB CNEL noise contour for Santa Barbara Airport. Industrial land uses are identified as compatible within this contour in the 1993 Santa Barbara County ALUP. Therefore, Alternative 2 would not conflict with the 1993 Santa Barbara County ALUP, similar to the proposed project.

The 1993 Santa Barbara County ALUP does not specify a maximum height for structures in Safety Area 1, and states that objects should be limited in height consistent with airspace protection surfaces defined by FAR Part 77. Alternative 2's industrial building would have a maximum height of approximately 35 feet from finished grade, and would have a maximum height of approximately 39 to 41 feet, similar to the proposed project. Although Alternative 2 would increase building height on the project site, and would be built at a height taller than existing development in the area, Alternative 2 would be consistent with the City's development standards and zoning code that existed prior to 2020, which considered proximity to the Santa Barbara Municipal Airport.

Similar to the proposed project, Alternative 2 would not require Airport Land Use Commission review as the previous zoning ordinance and General Plan were found consistent with the 1993 Santa Barbara County. Alternative 2 would comply with additional applicable FAR Part 77 and Federal Aviation Administration (FAA) standards, which requires projects that may affect navigable airspace to submit a Notice of Proposed Construction or Alteration to FAA for review and approval. If a proposed development is identified as a presumed hazard, the FAA may require further aeronautical study or allow Alternative 2 to be revised. The applicant would be required to file a Notice of Proposed Construction or Alteration with the FAA regional office at least 30 days prior to construction. Based on Alternative 2's design, the FAA would then determine whether Alternative 2 poses a hazard to air navigation and could request changes to project design to minimize those hazards. The FAA would evaluate Alternative 2 against FAR Part 77 Section 77.17, which provides height standards to ensure Alternative 2 would not obstruct navigable airspace. Additionally, the FAA would provide lighting recommendations under FAR Part 77 Section 77.21 (d) [4]. Similar to the proposed project, compliance with these existing regulations would ensure Alternative 2's impacts related to airport hazards would be less than significant.

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

The City's General Plan does not identify roadways adjacent to the project site as major evacuation routes. Construction of Alternative 2 would not impair implementation of an adopted emergency response plan or emergency evacuation plan, as construction staging and construction worker parking would occur on-site and would not impede existing roadway traffic. Operation of Alternative 2 would consist of an industrial warehouse building used for similar activities as the proposed project and would not introduce activities that could impede or interfere with emergency plans or emergency evacuations. Similar to the proposed project, Alternative 2 would have a less than significant impact related to conflicts with an adopted emergency response plan or emergency evacuation plan.

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

The project site is not within a SRA, or lands classified as VHFHSZ. Alternative 2 would be constructed in accordance with the same requirements as the proposed project, including the California Fire Code and Santa Barbara County Fire Department (SBCFD) standards. As with the proposed project, adherence to these regulations would ensure Alternative 2 would have a less than significant impact related to wildland fire.

i. Hydrology and Water Quality

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

Construction

Alternative 2 would result in similar demolition activities as the proposed project, but would disturb 0.12-acre greater during construction and therefore have marginally increased potential to violate water quality standards or waste discharge requirements. Alternative 2's potential to introduce stormwater pollutants would be minimized with adherence to SWRCB's Construction Stormwater General Permit which requires implementation of a SWPPP and construction BMPs to minimize pollutant discharge during demolition and construction. In addition to NPDES permit requirements,

Alternative 2's construction activities would be subject to the requirements of Chapter 15.09 of the City's Municipal Code which requires preparation and implementation of an erosion and sediment control plan. Nonetheless, due to the highly erodible on-site soils, mitigation would be required to reduce erosion. Similar to the proposed project, Alternative 2 would require implementation of Mitigation Measure GEO-1, which would require implementation of construction measures to minimize erosion. Implementation of Mitigation Measure GEO-1 would reduce Alternative 2's impact on water quality due to erosion to a less than significant level, similar to the proposed project.

Construction of Alternative 2's drainage outfall also would have a similar potential as the proposed project to reduce water quality in San Jose Creek if installation of the cofferdam would occur during the wet season. Alternative 2's construction impacts on the water quality of San Jose Creek would be potentially significant. However, required implementation of Mitigation Measure BIO-3 would require the cofferdam to be installed during the dry season and implementation of a Toxic Materials Control and Spill Response Plan which would reduce Alternative 2's water quality impacts on San Jose Creek to a less than significant level, similar to the proposed project.

Similar to the proposed project, Alternative 2 could require groundwater dewatering activities during grading activities. Alternative 2 would be required to obtain coverage under the Limited Threat Discharge Permit if drained groundwater would be discharged into San Jose Creek. Adherence to the permit would reduce potential water quality impacts associated with dewatered groundwater. Similar to the proposed project, if dewatered groundwater is contaminated, the construction contractor for Alternative 2 could not obtain coverage from the Limited Threat Discharge Permit, and impacts would be potentially significant. Alternative 2 would require implementation of Mitigation Measure HAZ-3 which would require groundwater investigation and disposal in accordance with the requirements of the Central Coast RWQCB or City. Implementation of Mitigation Measure HAZ-3 would reduce Alternative 2's potential impact on water quality due to groundwater dewatering to a less than significant level, similar to the proposed project.

Operation

Alternative 2 would be used for similar purposes as the proposed project (i.e., indoor warehousing and storage, wholesaling and distribution, and construction and materials storage) and could introduce potential water pollutants through oil leaks, leaching of metals from roof and drains, and use of pesticides or fertilizers for landscape maintenance. Alternative 2 would not be subject to the NPDES Phase I industrial stormwater regulations because Alternative 2 would not include facilities that are included on the Standard Industrial Classification Codes specified in the permit. Similar to the proposed project, Alternative 2 would be required to comply with Chapter 13.04 of the City's Municipal Code and the Phase II MS4 Permit, which require the use of Source Control and Low-Impact Development (LID) BMPs to detain, retain, and treat runoff and implementation of operational BMPs to capture, treat, and reduce pollutants of concern in stormwater runoff. Alternative 2 would provide a detention basin, hydrodynamic separator, swales, and catch basin inlet filters for stormwater runoff treatment. Alternative 2's detention basins would provide 9,304 square feet greater of stormwater facilities than the proposed project's detention basin. Alternative 2's larger detention basins would reduce Alternative 2's potential to result in degraded water quality during operation in comparison to the proposed project. Alternative 2's detention basins would be sized in accordance with the requirements of the Central Coast RWQCB. Regardless, due to the presence of erodible soils on-site, operation of Alternative 2 could result in potentially significant water quality impacts due to erosion. As with the proposed project, Alternative 2 would require implementation of Mitigation Measure GEO-1 which would require implementation of operational erosion controls such as periodic observations for indications of soil instability, and landscaping management to improve soil

stabilization during operation. With implementation of Mitigation Measure GEO-1, Alternative 2's operational water quality impacts would be reduced to a less than significant level, similar to the proposed project.

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

Alternative 2 has a similar potential to encounter groundwater during construction as the proposed project due to the shallow groundwater level on-site. Alternative 2's groundwater dewatering activities would be of similar length as the proposed project, lasting only during excavations required to insert utility connections and construction of the drainage basin. Alternative 2's groundwater dewatering would result in a similar local decrease of groundwater supplies as the proposed project, which would be minimal, and would not otherwise result in substantial groundwater losses in the Basin or result in changes which prohibit groundwater infiltration on-site compared to existing conditions. Therefore, construction of Alternative 2 would have a less than significant impact on groundwater, similar to the proposed project.

Alternative 2 would include approximately 183,675 square feet of impervious surfaces compared to the proposed project's 184,543 square feet of impervious surfaces. The project site contains low permeability soils and high groundwater elevation, thereby rendering groundwater infiltration infeasible. Accordingly, Alternative 2 would not result in substantial interference to groundwater recharge, similar to the proposed project.

Operation of Alternative 2 would include similar activities as the proposed project and therefore would not require groundwater extraction on-site. Alternative 2 would generate the same 19.8 acre-feet per year demand as the proposed project because Alternative 2 would not change the size of the proposed industrial building or maximum employees. Groundwater provided to Alternative 2 from the Goleta Water District (GWD) would be provided in accordance with the allocations determined by the Wright Judgement which would ensure the groundwater provided to Alternative 2 is sustainably managed. Furthermore, existing regulatory measures requiring water conservation during times of drought prevent the overdraft of the Basin that GWD would use to supply water demand of Alternative 2. Therefore, Alternative 2 would not substantially increase water supplies and this impact would be less than significant, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?

Construction

Alternative 2's construction activities would disturb approximately 6.87 acres in comparison to the proposed project's 6.75-acre disturbance area and therefore result in marginally greater potential for erosion and sedimentation. Similar to the proposed project, Alternative 2 would adhere to the requirements of the Construction Stormwater General Permit, the Limited Threat Discharge Permit, the City Municipal Code, as well as implementation of the required SWPPP and construction BMPs would minimize pollutant discharge in stormwater runoff. However, due to the erodibility of the project site, Alternative 2's impacts would be potentially significant and require mitigation. Alternative 2 would require implementation of Mitigation Measure GEO-1 which, similar to the

proposed project, would incorporate erosion control measures and reduce Alternative 2's construction impacts related to erosion to a less than significant level.

Operation

Similar to the proposed project, Alternative 2 would be required to use Source Control and LID BMPs to detain, retain, and treat runoff and implementation of operational BMPs to capture, treat, and reduce pollutants of concern in stormwater runoff. Alternative 2's detention basins would provide 9,304 square feet greater of stormwater facilities for stormwater detention and treatment than the proposed project's detention basin. Regardless, due to the presence of erodible soils on-site, operation of Alternative 2 could result in potentially significant water quality impacts due to erosion. As with the proposed project, Alternative 2 would require implementation of Mitigation Measure GEO-1 which would require implementation of operational erosion controls such as periodic observations for indications of soil instability, and landscaping management to improve soil stabilization during operation. With implementation of Mitigation Measure GEO-1, Alternative 2's operational impacts related to erosion would be reduced to a less than significant level, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Construction

Similar to the proposed project, Alternative 2 would comply with the requirements of the Construction Stormwater General Permit, including requiring the construction contractor to implement a SWPPP. The SWPPP would include construction BMPs to control and direct on-site surface runoff. Construction would not include activities which could result in the channelization of San Jose Creek or relocation of a natural drainage bed which could increase the rate of surface water runoff. Therefore, Alternative 2's construction activities would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. This impact would be less than significant, similar to the proposed project.

Operation

Alternative 2 would be required to use Source Control and LID BMPs to detain, retain, and treat runoff. Alternative 2's detention basins would provide 9,304 square feet greater of stormwater facilities for stormwater detention and treatment than the proposed project's detention basin. The detention basins would meet the requirements of the Central Coast RWQCB. These requirements mandate Alternative 2's stormwater infrastructure be designed to provide treatment up to two times the 85th percentile storm event. Adherence to the regulatory requirements of the Central Coast RWQCB would ensure Alternative 2 would have a less than significant impact to on- or off-site flooding, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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?

Construction

Alternative 2 would comply with the same regulations as the proposed project intended to control stormwater runoff and reduce pollutants and ensure construction activities would not result in substantial runoff which would exceed the capacity of San Jose Creek. These include requiring the construction contractor to implement a SWPPP and construction BMPs that would direct and manage stormwater to minimize impacts to the capacity of San Jose Creek. However, even with adherence to regulatory requirements, construction activities could result in additional sources of polluted runoff due to construction within San Jose Creek and/or groundwater dewatering activities. Alternative 2 would require implementation of Mitigation Measures GEO-1, BIO-3 and HAZ-3, which would reduce Alternative 2's potential impacts associated with substantial runoff and polluted runoff to a less than significant level, similar to the proposed project.

Operation

Alternative 2 would be required to implement stormwater infrastructure in accordance with Central Coast RWQCB requirements which would provide for substantial stormwater and runoff control on-site. Alternative 2 would also adhere to the Central Coast RWQCB and City LID requirements for treatment of stormwater which would minimize polluted runoff generated during operation of Alternative 2. However, as with the proposed project, highly erodible on-site soils could lead to Alternative 2's operation introducing polluted runoff. Alternative 2 would require implementation of Mitigation Measure GEO-1 which would mandate procedures during operation to minimize on-site soil erosion. With implementation of Mitigation Measure GEO-1, Alternative 2's impact associated with substantial runoff and polluted runoff would be reduced to a less than significant level, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Flooding

Alternative 2 would be located on the same project site as the proposed project and therefore is subject to similar flood hazards. Although the project site is mapped as being located within a 100-year floodplain, the project site is not currently inundated by 100-year flood flows in the existing condition. Off-site rain and stormwater does not enter the project site due to the presence of an existing earthen berm around the project site. The berm prevents 100-year flood flows from entering the project site.

Although the project site in its current condition would not be inundated by 100-year flood flows, Alternative 2 would require additional flood-proofing design measures are required because the berm is not an accredited levee recognized by FEMA. Alternative 2 would require implementation of flood-proofing design measures in accordance with the City Municipal Code. These include the use of between 4 to 6 feet of fill to elevate the proposed building above the 100-year floodplain elevation. Alternative 2 would also be required to be certified by a registered professional engineer or architect that the City's floodplain development standards. In the event of a 100-year flood event, stormwater flows on the project site would be conveyed to Alternative 2's detention basins for eventual discharge

to the San Jose Creek. Because Alternative 2 would direct stormwater flows to San Jose Creek, the introduction of fill material for Alternative 2 would not substantially alter off-site flooding or drainage. Due to the earthen berm, flood water from the project site does not discharge to surrounding parcels. Similar to the proposed project, Alternative 2 would not change the flood carrying capacity of the project site, permanently alter a water course, or raise flood elevations. Due to the existing flood protection offered by the earthen berm, project design, and compliance with City requirements governing development within a floodplain, Alternative 2 would have a less than significant impact related to flooding, similar to the proposed project.

Sea Level Rise

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association [CBIA*] v. *Bay Area Air Quality Management District [BAAQMD]*, 62 Cal. 4th 369 [No. S 213478] issued December 17, 2015), it is not considered the purview of the CEQA process to evaluate the impact of existing environmental conditions on a proposed project. For informational purposes only, sea level rise is discussed below.

Alternative 2 would occur on the same project site as the proposed project and would therefore be subject to similar risks of sea level rise. Alternative 2 would require approximately 4 to 6 feet of fill to raise the industrial building above the floodplain. Based on a scenario with 100-year storm event with 6.6 feet of sea level rise, Alternative 2's industrial building would not be inundated because the industrial building would be elevated above San Jose Creek's anticipated water surface elevation of 14.78 feet. However, in the northeastern most portion of the project site, the access road to the industrial building, San Jose Creek maintenance road, and the creek's bank would below the water level elevation during a 100-year storm event. Therefore, should the worst-case 100-year water level elevation of 14.78 feet occur within San Jose Creek, the northern portion of the access road to the industrial building would be inundated, potentially preventing access to the industrial building. The City would incorporate recommendations made in the *Sea Level Rise and Coastal Hazards Analysis* prepared for the proposed project into Alternative 2 as conditions of approval. The recommendations would require the applicant to monitor future sea level rise and flood levels within San Jose Creek, and construct on-site flood control measures as determined appropriate by the City and other Responsible Agencies including but not limited to elevating the access road to the proposed industrial building above the 100-year floodplain elevation and continuing to provide maintenance access to San Jose Creek (e.g., constructing a levee, etc.). As part of the condition of approval, the potential effects of sea level rise on Alternative 2 would be evaluated 50 years after the start of construction in conjunction with the Santa Barbara County Flood Control District. With these conditions of approval, the potential for sea level rise to result in an impediment or redirection of flood flows at the project site would be minimized, similar to the proposed project.

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

The project site is located outside of a tsunami hazard zone and is not proximate to a large body of water and therefore is not subject to seiche. Therefore, as with the proposed project, Alternative 2 would not risk release of pollutants in a tsunami hazard zone or seiche hazard zone.

Alternative 2 would be subject to similar flood hazards as the proposed project, as described above. Alternative 2 would be designed and constructed in accordance with the floodproofing requirements of the City's Municipal Code which would elevate Alternative 2 two feet above the 100-year flood elevation. Accordingly, in the event the earthen berm fails, pollutants would not be released because

Alternative 2's industrial building would be elevated above the 100-year flood elevation. Furthermore, implementation of Mitigation Measure GEO-1 would require Alternative 2's design to include specific measures to minimize the release of stormwater pollutants. Due to regulatory requirements and required implementation of Mitigation Measure GEO-1, Alternative 2 would not risk release of pollutants due to flood hazards, similar to the proposed project.

The project site is within the inundation zone of the Rancho Del Ciervo dam. Alternative 2 and the proposed project would not include any features which would preclude routine dam inspection or otherwise increase the risk for dam failure and inundation. Therefore, Alternative 2's potential impacts related to pollutant release due to dam inundation would be less than significant, similar to the proposed project.

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

The Basin Plan, adopted by the Central Coast RWQCB, is the water quality control plan applicable to the project site. Alternative 2 would comply with applicable regulatory requirements related to stormwater runoff to minimize the potential for pollutants to degrade water quality. These include the Construction Stormwater General Permit, the Limited Threat Discharge Permit, the Central Coast RWQCB's Post-Construction Requirements, the County's Stormwater Technical Guide for Low Impact Development, and Chapter 13.04 and Chapter 15.09 of the City's Municipal Code. However, Alternative 2, has a similar potential as the proposed project to result in water quality impacts related to erosion, construction in San Jose Creek, and groundwater dewatering, which could conflict with the goal of the Basin Plan. Alternative 2 would require implementation of Mitigation Measures GEO-1, HAZ-3, and BIO-3 to reduce potential surface water quality impacts related to erosion, groundwater dewatering, and construction within San Jose Creek. With implementation of these measures, Alternative 2's impact related to conflicts with the Basin Plan would be reduced to a less than significant level, similar to the proposed project.

GWD's Groundwater Management Plan Goleta Groundwater Basin (2022) serves as the guiding document for GWD to manage groundwater in accordance with the Wright Judgement. As described above, Alternative 2 would not adversely impact groundwater supplies or the management of the Goleta Groundwater Basin in accordance with the Wright Judgement. Existing regulatory measures requiring water conservation during times of drought prevent the overdraft of groundwater that GWD would use to supply the demand induced by Alternative 2. Accordingly, Alternative 2 would have a less than significant impact related to conflicts with a sustainable groundwater management plan, similar to the proposed project.

j. Land Use and Planning

Threshold: Would the project physically divide an established community?

The project site is primarily surrounded by industrial and open space land uses. The nearest residential development to the project site is located to the east, across State Route 217. The project site is neither directly adjacent to residences nor located in a residential neighborhood. Alternative 2 would not include components such as roads that could divide an established community. As with the proposed project, Alternative 2 would not result in the physical division of an established community, and no impact would occur.

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

Similar to the proposed project, Alternative 2 includes development of an industrial warehouse building that would be consistent with the permitted uses in the City's M-1 zone. Alternative 2 would be consistent with the setback, coverage, height, and landscaping requirements within the M-S-GOL and M-1 zones as Alternative 2's proposed industrial building would be located more than 50 feet from the centerline and 20 feet from the right-of-way of South Kellogg Avenue and setback more than 10 feet from the property line; would not increase the 5.73-acre coverage of the proposed project; would not increase the height of the proposed project's building approximately 35 feet from the finished grade; and would not decrease landscaping compared to the proposed project.

As with the proposed project, Alternative 2 would be subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code). Section 35-97.2 of the previous zoning code states that if the project site is determined to be outside of this district, then the regulations of the overlay district shall not apply. A small portion of San Jose Creek to the southeast of the project site is located within the ESHA Overlay District. Alternative 2 would include utility development within 50 feet of this area. Section 35-97.19 of the previous zoning code states that no structures shall be allowed within stream corridors when located in the ESHA Overlay District. Because the utility trench would be subsurface and not considered structural development, Alternative 2's utility trench would be consistent with the previous zoning code.

Alternative 2's detention basin outfall would be located within the boundary of the Goleta Slough State Marine Conservation Area (SMCA), similar to the proposed project. Authorization for any activities in the Goleta Slough SMCA would be provided by California Department of Fish and Wildlife as part of the Lake and Streambed Alteration Agreement notification process. Therefore, Alternative 2 would not conflict with land use policies within the Goleta Slough SMCA, similar to the proposed project.

The project site is located within the Airport Influence Area of Santa Barbara Airport. Alternative 2 would comply with the ALUP development standard of a maximum intensity of 25 people per acre, as Alternative 2 would employ up to 75 people daily which would represent an intensity of up to 6.37 people per acre, the same as the proposed project. The project site is located in the 60-65 dB CNEL noise contour for the Santa Barbara Airport; however, industrial land uses are classified as compatible in this contour in the 1993 Santa Barbara County ALUP. Similar to the proposed project, Alternative 2 would not conflict with the safety and noise policies of the 1993 Santa Barbara County ALUP.

Mitigation Measures BIO-1 through BIO-4 in Section 4.3, *Biological Resources*, and Mitigation Measure NOI-1 in Section 4.11, *Noise*, would reduce Alternative 2's impacts involving conflicts with land use plans, policies, or regulations that were adopted for purposes of reducing environmental impacts to the extent feasible. Mitigation Measures BIO-1 through BIO-4 would reduce potential impacts to special-status species, and Mitigation Measure NOI-1 would reduce project construction noise. These mitigation measures would reduce impacts involving conflicts with the Goleta General Plan as they would minimize potential impacts to protected environmental resources within the Goleta General Plan.

Due to the requested reduction in the 100-foot SPA buffer, the proposed project was determined to be potentially inconsistent with Goleta General Plan Policy CE 1.6, CE 2.2, and CE-2.6 intended to protect ESHAs, SPAs, and creeks, respectively. Unlike the proposed project, Alternative 2 would limit development within the San Jose Creek 100-foot SPA buffer to access road improvements, installation

of the underground utility trench, and the addition of landscaping, which are allowable uses within the SPA buffer. Accordingly, Alternative 2 would reduce development within the 100-foot SPA buffer in comparison to the proposed project and would therefore provide increased protection for ESHAs and SPAs and would allow for restoration of San Jose Creek in compliance with Policy CE-2.6. Therefore, Alternative 2 would reduce the proposed project's significant and unavoidable impact related to conflicts with Goleta General Plan Policies CE 1.6, CE 2.2, and CE 2.6 to a less than significant level.

Due to the height of the proposed project and Alternative 2's proposed industrial building 35 feet above the finish grade, both the proposed project and Alternative 2 would impair views of the Santa Ynez Mountains and foothills experienced from the SR 217 local scenic corridor and therefore would be potentially inconsistent with the following Goleta General Plan policies:

- Policy LU 1.8: New Development and Neighborhood Compatibility
- Policy VH 1.1: Scenic Resources
- Policy VH 2.2: Preservation of Scenic Corridors
- Policy VH 2.3 Development Projects Along Scenic Corridors

Similar to the proposed project, feasible mitigation is unable to be implemented to reduce Alternative 2's potential impact on scenic views. Accordingly, Alternative 2 would conflict with the Goleta General Plan and result in a significant and unavoidable impact, similar to the proposed project.

k. Noise

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

Construction

Construction activities under Alternative 2 would be the same as the proposed project, and would include demolition, grading, and building construction that would temporarily increase noise levels at noise-sensitive receptors in the project site vicinity. The site plan adjustments under Alternative 2 would potentially move construction equipment closer to the residence at 1150 S Fairview Avenue, with construction occurring as close as 300 feet (as opposed to 425 feet under the proposed project). Construction would generally be moved further from the Rancho Goleta Community under Alternative 2, although would still be within 325 feet at the closest point from entrance road construction as with the proposed project.

Estimated construction noise levels from Alternative 2 are provided in Table 6-6, using the same construction equipment assumed for the proposed project. As shown in the table, construction noise levels may exceed Goleta's 65 dBA standard at both residences to the west and the Rancho Goleta mobile home community to the east. The proposed project's construction would occur at a sufficient distance from the residence to the west (1150 S Fairview) to be below Goleta's standard. However, Alternative 2 would result in greater construction noise impacts than the proposed project (up to 4 dBA greater compared to the proposed project). The overall significance conclusion would be the same, as both the proposed project and Alternative 2 would exceed Goleta's standard to the east. Similar to the proposed project, Alternative 2 would implement Mitigation Measure NOI-1, which would need to include an additional temporary noise barrier on a portion of the western project

boundary to mitigate construction noise below Goleta's 65 dBA standard. Impacts would be less than significant with mitigation, and greater than the proposed project.

Table 6-6 Construction Noise Levels – Alternative 2

Receptor	Land Use Type	Direction from Project Site	Distance from Construction (feet)[2]	Noise Level (dBA Leq)[1]		Exceed Threshold?[3]
				General Construction	Joint Utility Trench Construction	
1150 S Fairview Ave	Single-family	West	300	66	68	**Yes**
Rancho Goleta Community	Mobile Home	East	325	66	67	**Yes**

[1] The loudest construction scenario analyzed for both activities was assumed to be a grader, excavator, and loader.

[2] Noise calculated using a sound attenuation formula with the proposed project for a reference noise and distance: SPL2=SPL1−20log(*R*2*R*1),SPL2=SPL1−20log(*R*1*R*2), where SPL1=sound pressure level at point 1; SPL2=sound pressure level at point 2; R1=Distance from the sound source to point 1, and; R2=Distance from the sound source to point 2

[3] The City of Goleta threshold is if construction noise exceeds 65 dBA.

Operation

Loading Bay Activities

Potential on-site truck activities from Alternative 2 include eight loading bays (two more than the proposed project), which would be located on the western side of the building. Noise from truck and unloading activities at the loading docks would generate noise that has the potential to increase noise at nearby sensitive receptors. Loading bay noise from Alternative 2 is shown in Table 6-7.

Table 6-7 Loading Bay Noise – Alternative 2

Receptor	Land Use Type	Direction from Project Site	Eight Loading Bays – West End		Exceed Threshold?[1]
			Distance from Source	Noise Level (dBA)	
1150 S Fairview Ave	Single-family	West	540	53	No
Rancho Goleta Community	Mobile Home	East	690	51	No

[1] The City of Goleta threshold is if operational noise increases noise levels to exceed 65 dBA CNEL at sensitive receptors if existing noise levels are below 65 dBA CNEL, or if existing noise levels already exceed 65 dBA CNEL, if the operation noise increases noise levels by 3 dBA CNEL or more.

The combined loading dock noise level is highest at 1150 South Fairview Avenue, with a noise level of 53 dBA. However, these noise levels would be well below the City's 65 dBA CNEL standard. In addition, ambient noise levels were measured as 63 dBA CNEL near 1150 South Fairview Avenue, with similar ambient noise levels expected at Rancho Goleta mobile home community due to the exposure of the community to SR 217 and Santa Barbara Airport noise levels; therefore, the loading dock noise levels from Alternative 2 would not exceed existing ambient noise levels. These noise levels are slightly higher than the proposed project's, with an increase in noise levels of 2 dBA at 1150 South Fairview Avenue and 1 dBA at Rancho Goleta mobile home community due to the closer placement of loading docks. Therefore, Alternative 2 would result in greater loading dock noise impacts than the proposed project. Impacts would be less than significant, and greater than the proposed project.

Mechanical Equipment

The proposed industrial building for Alternative 2 would include HVAC units that would generate noise that could increase ambient noise levels at nearby sensitive receptors. Seven HVAC units were assumed to be located in a cluster on the rooftop; for each sensitive receptor, it was conservatively assumed that they would be located at the closest building edge to that receptor. The rooftop would be lined with a parapet wall that would provide noise screening and was assumed to result in a 5 dBA reduction. HVAC noise levels are shown in Table 6-8.

Table 6-8 HVAC Noise – Alternative 2

Receptor	Land Use Type	Direction from Project Site	Distance from Source	HVAC Units Noise Level (dBA)	Exceed Threshold?[1]
1150 S Fairview Ave	Single-family	West	390	44	No
Rancho Goleta Community	Mobile Home	East	480	42	No

[1] The City of Goleta threshold is if operation increases noise levels to exceed 65 dBA CNEL at sensitive receptors if existing noise levels are below 65 dBA CNEL, or if operation increases noise levels by 3 dBA CNEL or more if existing noise levels already exceed 65 dBA CNEL.

Table 6-8 shows that the HVAC noise level from Alternative 2 is highest at the residence to the west, with a noise level of 44 dBA. The noise levels would be well below the City's 65 dBA CNEL standard. In addition, ambient noise levels were measured as 63 dBA CNEL near 1150 South Fairview Avenue, with similar ambient noise levels expected at Rancho Goleta mobile home community; therefore, the HVAC noise levels from Alternative 2 would not exceed existing ambient noise levels. These noise levels are slightly higher than the proposed project's, with an increase in noise levels of 3 dBA to 1150 South Fairview Avenue. Therefore, Alternative 2 would result in greater HVAC noise impacts than the proposed project. Impacts would be less than significant, and greater than the proposed project.

Combined Operational Noise Levels

The combined noise levels from loading bay activities and HVAC equipment for Alternative 2 are shown in Table 6-9. These noise levels would be well below the City's 65 dBA CNEL standard, and below the existing ambient noise levels. Therefore, operational noise from Alternative 2 would be less than significant. These noise levels are slightly higher than the proposed project's, with an increase in noise levels of 2 dBA to 1150 South Fairview Avenue. Therefore, Alternative 2 would result in greater operational noise impacts than the proposed project due to the adjusted location of the building. Impacts would be less than significant, and greater than the proposed project.

Table 6-9 Combined Operational Noise Levels – Alternative 2

Receptor	Land Use Type	Direction from Project Site	Loading Bays Noise Level (dBA)	HVAC Units Noise Level (dBA)	Combined Noise Level (dBA)	Exceed Threshold?[1]
1150 S Fairview Ave	Single-family	West	53	44	53	No
Rancho Goleta Community	Mobile Home	East	51	42	51	No

[1] The City of Goleta threshold is operation increases noise levels to exceed 65 dBA CNEL at sensitive receptors if existing noise levels are below 65 dBA CNEL, or operation increases noise levels by 3 dBA CNEL or more if existing noise levels already exceed 65 dBA CNEL.

Off-site Traffic Noise

CONSTRUCTION

Construction worker trips with Alternative 2 would be expected to be similar to the proposed project. Haul trips would be slightly increased from 1,100 to 1,148 total trips, which may slightly increase the 220 daily haul trips assumed for the proposed project's construction traffic noise analysis. This would result in a minor increase in construction traffic noise from Alternative 2 compared to the proposed project. The overall estimated increase on nearby roadways would reach up to 0.2 dBA, similar to the proposed project. Therefore, Alternative 2 would result in greater construction traffic noise impacts than the proposed project due to a slight increase in hauling trips. Impacts would be less than significant, and greater than the proposed project.

OPERATION

Operation of Alternative 2 would generate the same number of trips as the proposed project. The operational traffic noise increases would be the same as the proposed project, which were up to 0.2 dBA noise increase, which is well below the 3 dBA increase threshold. Therefore, Alternative 2 would result in less than significant traffic noise impacts from operation, which would be similar to the proposed project.

Threshold: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be used to construct Alternative 2. Similar to the proposed project, the greatest anticipated source of vibration during general project construction activities would be from a dozer, which would be used as close as 50 feet during construction from the nearest buildings to the northeast. A dozer would create a vibration level of approximately 0.089 PPV in/sec. at a distance of 25 feet, similar to the proposed project. This would equal a vibration level of approximately 0.042 PPV in/sec at a distance of 50 feet. This vibration level would be well below the Caltrans vibration damage potential threshold for older structures of 0.3 PPV in/sec for continuous/frequent intermittent sources. Therefore, temporary vibration impacts from Alternative 2 associated with the dozer (and other potential equipment) would be less than significant, and similar to the proposed project.

Operational activities known to generate excessive ground-borne vibration include projects involving railroads and subways. Alternative 2 would not involve substantial vibration sources associated with operation such as this. Therefore, Alternative 2's operational groundborne vibration and noise impacts would be less than significant, similar to the proposed project.

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

The project site is located within the 60 to 65 CNEL noise contour from Santa Barbara Airport, which is approximately 1,100 feet to the west. This would be a noise exposure within the City's "normally acceptable" recommendation for noise levels for industrial uses, which is up to 70 CNEL. Therefore, construction workers building Alternative 2 or workers of the industrial building would not be

exposed to excessive airport noise levels, and impacts would be less than significant, similar to the proposed project.

I. Public Services

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

Alternative 2 would result in the same maximum amount of employees as the proposed project (up to 75) and would not include residential uses. Accordingly, Alternative 2 could result in population growth of 198 people based on the city's average persons per household of 2.64, which is the same growth potential as the proposed project. The addition of 198 people to Goleta would maintain the existing SBCFD ratio of approximately 2.77 firefighters per 2,000 persons and thus not substantially diminish fire protection services such that new fire protection facilities would be needed. The project site is located approximately 1.3 miles from the County Station 12 and thus firefighters would be able to readily respond to the demand for fire services at the project site. Alternative 2 would be constructed in accordance with the same regulations as the proposed project, including the California Fire Code and SBCFD regulations, which would minimize the potential for fire protection services to be needed at the project site. As with the proposed project, the project applicant would be required to pay development impact fees which would provide funding for expanded fire protection facilities, including environmental compliance and permitting for new facilities. Due to the small potential increase in population and regulatory compliance, Alternative 2's impact to fire protection facilities would be less than significant, similar to the proposed project.

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

Alternative 2 would result in the same maximum population growth of 198 persons as the proposed project. This population growth represents less than one percent of Goleta's existing population which is not anticipated to substantially alter the existing service ratios provided by the contracted Deputy Service Units such that an additional officer would be required in order to provide adequate public services. Thus Alternative 2, similar to the proposed project, would not be expected to result in substantial additional police services or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts. In addition, the project applicant would be required to pay development impact fees to provide revenue to assist with funding future capital facilities for police services or increased law enforcement personnel. Similar to the proposed project, Alternative 2 would have a less than significant impact on police facilities.

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

Alternative 2 would generate the same maximum amount of students as the proposed project, which could result in up to 15 additional students in the Goleta Unified School District (GUSD) and another 15 students in the Santa Barbara Unified School District (SBUSD). This student increase would not exceed the capacities of GUSD or SBUSD facilities. Furthermore, the applicant would pay state-mandated developer fees to fund the construction of school facilities to accommodate students generated from new development projects. Pursuant to Senate Bill 50, payment of this fee "…is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." With payment of school fees, Alternative 2 would have a less than significant impact on schools, similar to the proposed project.

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

As with the proposed project, Alternative 2 could indirectly result in a population growth of approximately 198 people which would not place additional demand on library services or inhibit the ability for the Goleta Valley Library to maintain material circulation. The existing library facility would be sufficient to accommodate the potential incrementally increased use and circulation needs that may result from indirect population growth due to Alternative 2. Furthermore, the applicant would pay development impact fees which would fund the provision of new or expanded libraries. Therefore, Alternative 2 would have a less than significant impact on the need for new or physically altered libraries, similar to the proposed project.

m. Transportation and Circulation

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

Alternative 2 includes similar elements as the proposed project and would not introduce features that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Alternative 2 would be consistent with the City's Transportation Element policies. Alternative 2 would not cause changes to the existing bicycle facilities on Hollister Avenue, Fairview Avenue, or Ward Drive. There is an existing sidewalk located on South Kellogg Avenue, and Class III bicycle lanes located on South Kellogg Avenue. Alternative 2 would include the same transportation components as the proposed project. Project site access would be provided via an existing driveway which connects to an access road. Alternative 2 would resurface the existing access road. Alternative 2 would also include installation of a sidewalk which would start at South Kellogg Avenue and extend to the proposed parking lot. Alternative 2's design features would be subject to review and approval by the City, which would ensure Alternative 2 would conform to the City's driveway access control and vision clearance standards and minimize potential vehicle to pedestrian and vehicle to cyclist conflicts in accordance with City standards. Alternative 2, similar to the proposed project, would not generate a substantial increase in transit use due to the

increase in up to 75 employees as employees are anticipated to be residents of Goleta who area within the service area of the Santa Barbara Metropolitan Transit District.

Given the above considerations, Alternative 2 would have a less than significant impact on a program, plan, ordinance or policy that addresses the current circulation system including transit, roadway, bicycle, and pedestrian facilities, similar to the proposed project.

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

Construction of Alternative 2 would result in similar, short-term, temporary vehicle trips as the proposed projects, which would not result in long term changes to vehicle miles traveled (VMT) within Goleta. Therefore, Alternative 2's construction VMT would not be inconsistent with CEQA Guidelines Section 15064.3(b), similar to the proposed project. The project site is within an area identified by the City where work-based projects would generate an average VMT of 15 percent or more below baseline levels, would not require a VMT analysis, and would be presumed to have a less than significant impact on VMT. Therefore, similar to the proposed project, Alternative 2 would have a less than significant impact on VMT and would not conflict with CEQA Guidelines Section 15064.3(b).

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

Construction staging for Alternative 2 would be located at the project site which would minimize the potential for construction related vehicles and equipment to create a circulation related hazard in the immediate area. As with the proposed project, Alternative 2 would be required to widen the eastern portion of the driveway in order to accommodate WB-62 delivery truck turning requirements. WB-62 delivery trucks would be expected to access the project site via South Kellogg Avenue, Hollister Avenue, and SR 217, all of which can accommodate a WB-62 delivery truck. The transportation design of Alternative 2 would also be required to be reviewed by SBCFD and the City to ensure Alternative 2 would not introduce geometric design hazards. Alternative 2 would not introduce new incompatible uses, such as farm equipment, to roadways. Therefore, Alternative 2 would have a less than significant impact on transportation hazards, similar to the proposed project.

Threshold: Would the project result in inadequate emergency access?

Construction staging for Alternative 2 would occur on-site, similar to the proposed project, which would minimize the potential for construction-related vehicles and equipment to result in inadequate emergency access in the immediate area. Alternative 2 and the proposed project would be required to be designed in accordance with applicable SBCFD standards, including those that address minimum driveway width, signage and addressing, fire hydrants, fire sprinklers, and emergency access. Alternative 2 would also be required to widen the driveway which would also improve access for emergency vehicles. With compliance with SBCFD and City standards, Alternative 2's impacts to inadequate emergency access would be less than significant, similar to the proposed project.

n. Tribal Cultural Resources

Threshold: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Alternative 2 would be located on the same project site as the proposed project, and therefore would have a similar potential to impact tribal cultural resources. Based on Native American consultation conducted for the proposed project, no tribal cultural resources have been identified on the project site. The Archaeological Resources Assessment completed for the project site determined there is a very low potential for subsurface resources to exist within the project site. Therefore, similar to the proposed project, Alternative 2 would not cause a substantial adverse change to tribal cultural resources, and impacts would be less than significant.

o. Utilities and Service Systems

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

Water

Alternative 2 would require similar water utility infrastructure as the proposed project, including a water line to connect to existing GWD infrastructure that would connect underneath the sidewalk adjacent to South Kellog Avenue. Alternative 2 would result in the same water demand as the proposed project and therefore Alternative 2 would not generate substantial water demand and would not necessitate new or expanded facilities in order to meet Alternative 2's water demand. Therefore, Alternative 2's impact on water infrastructure would be less than significant, similar to the proposed project.

Wastewater

Alternative 2 would require similar sewer infrastructure as the proposed project in order to connect to the sewer line located underneath South Kellogg Avenue. Alternative 2 would generate the same amount of wastewater during operation as the proposed project. Therefore, wastewater generated by Alternative 2 would not exceed the existing capacity of the Goleta Sanitary District's (GSD) wastewater treatment plant (WWTP). Alternative 2 would not require new or expanded wastewater treatment facilities beyond the sewer line connection. Similar to the proposed project, Alternative 2's impact on wastewater infrastructure would be less than significant.

Stormwater

Similar to the proposed project, Alternative 2 would include development of a detention basin and outlet discharge into San Jose Creek. These stormwater facilities would be sized in accordance with Central Coast RWQCB and City requirements. Because the proposed stormwater drainage facilities would allow for stormwater filtration and detention on-site, and excess runoff would be directed to San Jose Creek, no additional stormwater infrastructure would be needed beyond the stormwater infrastructure included as part of Alternative 2. Similar to the proposed project, Alternative 2's impact on stormwater infrastructure would be less than significant.

Electric, Natural Gas, and Telecommunications Facilities

Alternative 2 would install a transformer pad and utility lines which would connect to existing electric, natural gas, and telecommunications infrastructure proximate to the project site, similar to the proposed project. Alternative 2's demand for electric and natural gas facilities would be the same as the proposed project. Southern California Edison (SCE) and the Southern California Gas Company (SCG) would have sufficient electricity and natural gas supplies for Alternative 2 without the installation of additional electric or natural gas infrastructure. Similarly, Alternative 2 would have the generate the same demand for telecommunications facilities as the proposed project and therefore would use existing telecommunications facilities during operation and would not require upgrades to existing facilities or create a demand for service unable to be met by existing providers. Therefore, similar to the proposed project, Alternative 2's impact to electric, natural gas, and telecommunications facilities would be less than significant.

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

Alternative 2 would include an industrial building the same size as the proposed project. According to the County's 2021 *Environmental Thresholds and Guidelines Manual*, Light Industry land uses are anticipated to have a water demand of 0.28 AFY per 1,000 square feet of development. Therefore, development of Alternative 2's 70,594 square foot industrial warehouse building would generate a water demand of approximately 19.8 acre-feet per year, the same as the proposed project. The project site has been allocated water based on historical water credits from the prior on-site use. Due to the similar proposed uses of Alternative 2 and the proposed project, adequate water supply would be available for Alternative 2 and could be served by GWD at the time of development. As with the proposed project, Alternative 2's anticipated demand of 19.8 AFY represents approximately 0.4 percent of GWD's anticipated 2040 surplus in a normal year, 0.6 percent of GWD's dry year one surpluses, and 0.8 percent of GWD's dry year two surpluses. Alternative 2 would comply with the same GWD-imposed water shortage restrictions as the proposed project during drought periods which would reduce its water demand in times of drought. Therefore, Alternative 2 would not result in substantial water supply reductions and this impact would be less than significant, similar to the proposed project.

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

Alternative 2 would result in the same amount of wastewater generated as the proposed project. The anticipated wastewater demand of 7,059 gallons per day, or 0.007 million gallons per day (MGD), represents approximately 0.6 percent of the 1.11 MGD capacity available at the GSD WWTP for GSD

customers. Similar to the proposed project, Alternative 2 would not generate wastewater in excess of existing capacity, and this impact would be less than significant.

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

and

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

Alternative 2 would result in the same demolition activities as the proposed project and would generate the same amount of demolition debris, which is approximately 443 tons of debris. The U.S. EPA utilizes a solid waste generation factor of 3.89 pounds per square foot for construction. Based on Alternative 2's disturbance area of 299,487 square feet, construction of Alternative 2 would result in approximately 583 tons of solid waste. In total, demolition and construction activities would generate approximately 1,026 tons of solid waste, approximately 97 tons greater than the proposed project. Demolition and construction of Alternative 2 would occur in a similar timeframe as the proposed project over the course of 14 months; therefore, construction activity would result in a waste generation rate of approximately 879 tons per year. Pursuant to Chapter 8.10, Article IV of the Goleta Municipal Code, construction contractors are required to divert 65 percent of all construction and demolition waste by weight from landfill disposal for any new structure. The applicant is required to submit a Waste Management Plan which would indicate how solid waste generated during demolition and construction would be diverted in accordance with City requirements. With compliance with City requirements, Alternative 2's demolition and construction activities would generate an estimated 359 tons of non-recyclable waste during the 14-month construction period, or approximately 308 tons per year. This amount of nonrecyclable waste would exceed the City's project-specific threshold of 196 tons per year. Similar to the proposed project, Alternative 2 would require implementation of Mitigation Measure UTIL-1 to implement a Waste Management Plan and further increase waste diversion. Alternative 2's reduction in waste generation that requires a landfill cannot be fully determined until implementation of Mitigation Measure UTIL-1 is completed, and therefore Alternative 2's short-term impacts related to demolition and construction waste would remain significant and unavoidable, similar to the proposed project. In addition, Alternative 2's short-term construction waste would have a cumulatively considerable contribution on cumulative impacts related to solid waste, similar to the proposed project.

Pursuant to the methodology of County's 2021 Environmental Thresholds and Guidelines Manual, which estimates solid waste generation for warehouse development using a factor of 0.0016 tons multiplied by the square footage of a project, operation of Alternative 2 would generate approximately 113 tons per year of solid waste, which is the same amount of solid waste as the proposed project. This solid waste would be reduced to 56.5 tons of non-recyclable solid waste per year, consistent with a 50 percent solid waste diversion rate, which is the same as the proposed project. This amount of solid waste does not exceed the City's project-specific threshold of 196 tons per year. Accordingly, operation of Alternative 2 would have a less than significant impact related to solid waste, similar to the proposed project.

6.3.3 Alternative 3: Outdoor Storage

Impacts Summary

Alternative 3 would develop an outdoor storage facility and small office building. Compared to the proposed project, Alternative 3 would result in a shorter construction duration, fewer employees, and less daily operational passenger and truck trips. Accordingly, Alternative 3's impacts related to per-capita generation, such as impacts related to population and housing, public services, and utilities and service systems would be less in comparison to the proposed project. Additionally, Alternative 3 would result in less air pollutant emissions, greenhouse gas emissions, and operational noise in comparison to the proposed project. Due to the low visual profile of Alternative 3, Alternative 3 would reduce the proposed project's significant unavoidable impacts related to aesthetics to less than significant. However, due to the location of Alternative 3 on the project site which would require a reduction in the 100-foot SPA buffer to 25 feet, Alternative 3 would have a significant and unavoidable impact on biological resources, the same as the proposed project.

Alternative 3 would fail to meet the following project objectives as Alternative 3 would not provide tenant space or an industrial building:

- To develop a project with long-term viability through design by providing sufficient square footage with flexibility of interior size and arrangement for up to 4 tenant spaces with 6 loading docks.
- To develop a project with sufficient height (up to 35 foot maximum) to accommodate a variety of potential tenant needs that are consistent with the General Plan/Coastal Land Use Plan (General Plan) designation of Service/Industrial and zoning designation of Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL).

In addition, Alternative 3 would only partially meet the following project objectives due to a reduction in employees compared to the proposed project:

- Attract local employment opportunities in the industrial sector and generate new property tax revenue for the City.
- Optimize economically beneficial reuse of a previously developed, disturbed, and underutilized site within the City with existing infrastructure and access on a site that has significant land use limitations, including airport, hydrologic, and flooding constraints, that limit compatible uses on the site.

a. Aesthetics

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

Unlike the proposed project, Alternative 3 would construct an outdoor storage facility with storage bays for construction materials and RV storage. The storage bays would be concrete "U" shaped walls with a maximum height of eight feet from finished grade. In addition, Alternative 3 would include a 500 square foot office building with a height of approximately 10 feet from the finished grade. Alternative 3 would include placement of fill to elevate the structures above the floodplain, and the corresponding height of the storage bays and office building would be 13 feet above existing grade and 15 feet above existing grade, respectively. Alternative 3 would reduce the maximum height of the proposed project's structures by 25 feet. The heights of the structures included in Alternative 3 would be consistent with height limits of the M-S-GOL and M-1 zones, pursuant to the City's previous

Coastal Zoning Ordinance. Similar to the proposed project, Alternative 3 would include aesthetic features such as architectural detailing and landscaping, which would reduce building massing and integrate the proposed building with natural areas of vegetation growing along SR 217.

Given the site's distance (0.9 mile and 0.7 mile respectively) from U.S. 101 and Hollister Avenue, the proposed outdoor storage area and office building would not degrade views from these locally designated scenic corridors. The project site is visible from the locally designated scenic corridor along SR 217. Unlike the proposed project, Alternative 3 would include structures that are similar heights to the existing on-site structures. Although Alternative 3's structures would be elevated above the heights of existing structures due to the use of fill material on-site, Alternative 3's structures would not rise above existing and proposed vegetation or the surrounding one- to two-story industrial development and would not obstruct northward scenic views of the foothills and Santa Ynez mountains from SR 217. In addition, Alternative 3 would not substantially alter public views of the project site from Kellogg Avenue and South Fairview Avenue as existing industrial development between these roads and the project site would obscure views of the project site and Alternative 3's structures would be similar heights to the surrounding industrial development. Accordingly, Alternative 3 would reduce the proposed project's significant and unavoidable impact to scenic resources to a less than significant level.

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

Alternative 3 would be constructed on the same project site as the proposed project. The project site is approximately 0.9 mile south of U.S. 101, which is eligible for designation as a State Scenic Highway. Similar to the proposed project, given the distance of U.S. 101 from the project site, as well as the presence of intervening vegetation and structures, construction of the proposed outdoor storage area and office building under Alternative 3 would not substantially degrade views from U.S. 101. Alternative 3 would result in no impacts to scenic highways, which is the same as the proposed project.

Threshold: If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Alternative 3 would develop an approximately 70,594 square foot outdoor storage facility with storage bays ranging from 5 to 8 feet from the finished grade and an office building 10 feet above the finished grade. The use of fill to elevate the structures above the floodplain would bring the total height of the storage bays to 13 feet above existing grade and the total height of the office building to 15 feet above existing grade. Similar to the proposed project, Alternative 3's landscaping would include approximately 60,939 square feet of the project site and would be comprised of native and climate-appropriate plantings.

Similar to the proposed project, Alternative 3 would not obstruct or substantially degrade views of the Pacific Ocean, beach, or other coastal areas, as those scenic resources are currently not visible from the site and southward views are blocked by intervening buildings, SR 217, and vegetation. Therefore, Alternative 3 would not conflict with Section 30251 of the California Coastal Act, which requires that development projects in the Coastal Zone protect scenic and visual qualities, including views of the ocean and scenic coastal areas

Alternative 3's operational activities would consist of storage which is considered a permitted use for the M-S-GOL zone under Section 35-84A of the City's previous Coastal Zoning Ordinance. Alternative 3's facilities would not exceed 35 feet from finished grade and would comply with the maximum

height limitation for the M-S-GOL zone established in Section 35-84A of the previous Coastal Zoning Ordinance.

Although Alternative 3 would alter the site's existing visual character by introducing an outdoor storage facility, the proposed intensity and height of development would be generally consistent with the Goleta General Plan. For example, Alternative 3 would be consistent with Policy VH 4.6, Industrial Areas, which requires industrial development to include architectural detailing to break building massing; adequate lighting; protected bicycle parking; screened outdoor storage, maintenance, or trash areas; and buffers or screens to protect residential development from industrial land uses. Alternative 3 would comply with Policy VH 4.6 as it would use landscaping to screen the site from SR 217 and residential development, would provide sufficient parking (including bicycle spaces), would screen outdoor maintenance or trash areas and would provide adequate lighting in accordance with City requirements.

Unlike the proposed project, Alternative 3 would not obstruct scenic views of the Santa Ynez Mountains and foothills experienced by northward travelers along SR 217, a designated local scenic corridor. Therefore, Alternative 3 would be consistent with Goleta General Plan Policy VH 1.1, Scenic Resources, which identifies scenic resources in the City; Policy VH 2.2, Preservation of Scenic Corridors, which requires preservation of aesthetic qualities of scenic corridors; and Policy VH 2.3, Development Projects Along Scenic Corridors, which requires development adjacent to scenic corridors to not degrade or obstruct views of scenic areas. Accordingly, Alternative 3 would reduce the proposed project's significant and unavoidable impact on scenic quality to a less than significant level.

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

Similar to the proposed project, construction of Alternative 3 is not anticipated to occur during evening or nighttime hours and would thus not introduce new light sources to the site during the construction time period. Consequently, the following discussion focuses on Alternative 3's operational impact involving light and glare.

Alternative 3 would introduce new sources of light from parking and the exterior of the office building and storage areas once operational. Lighting would be similar to the proposed project, consisting of a combination of exterior building-mounted wall packs as well as pole-mounted fixtures in the parking lot and storage areas. All lighting would use LED fixtures and would include semi- and fully cut-off light fixtures. Alternative 3's lighting would be designed in accordance with City standards, including Goleta General Plan Policy 4.12, Lighting, which requires outdoor lighting fixtures to be designed, located, aimed downward or toward structures (if properly shielded), retrofitted if feasible, and maintained in order to prevent over-lighting, energy waste, glare, light trespass, and sky glow.

Alternative 3's design, including lighting, would be subject to FAR Part 77, which requires projects that may affect navigable airspace to submit a Notice of Proposed Construction or Alteration. If a proposed development is identified as a presumed hazard, the FAA may require further aeronautical study or allow the project to be revised. The project applicant would be required to file a Notice of Proposed Construction or Alteration with the FAA regional office at least 30 days prior to construction. Based on Alternative 3's design, the FAA would then determine whether Alternative 3 poses a hazard to air navigation and could request changes to Alternative 3's design to minimize those hazards. The FAA would evaluate Alternative 3 against FAR Part 77 Section 77.17, which provides height standards to ensure Alternative 3 would not obstruct navigable airspace. Additionally, the FAA would provide lighting recommendations under FAR Part 77 Section 77.21 (d) [4]. Therefore, similar to the proposed

project, Alternative 3's lighting would not be substantial to the extent that it would interfere with aviation activity and interfere with views.

Moving sources of light would come from the headlights of vehicles driving on roadways near the project site and entering or exiting the site early in the morning and evening. While Alternative 3's operation would involve vehicle travel, and thus potential light from vehicles, these lighting sources would be similar to existing conditions surrounding the site, as commercial and industrial vehicles are frequent in the area.

Alternative 3 would introduce new sources of glare in the form of focused light from the office building and parked car and RV windows. The storage bays would not cause glare as they would be constructed from concrete. Because Alternative 3's office building would be constructed of light-colored exteriors with elements of glass (windows), Alternative 3 has the potential to reflect sunlight and produce glare from this building. However, vegetative screening along the perimeter of the project site would reduce off-site impacts of glare from both the proposed building and from vehicles associated with building and storage operation. Considering adjacent land uses include few glare-sensitive receptors, the potential for glare-related impacts would be limited. Overall, Alternative 3 would have a less-than-significant impact associated with light and glare, which would be similar to the proposed project.

b. Air Quality

Threshold: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Alternative 3 would involve the construction and operation of an outdoor storage area, RV storage, and an office building. Alternative 3 does not propose residential uses and would not directly increase population growth. Alternative 3 is estimated to add approximately 5 new employees. While these jobs would likely come from the local workforce, it is conservatively assumed that all 5 new employees would become new residents. In a conservative scenario, there would be a population growth of 13 based on the city's average persons per household of 2.64. Goleta has a current population of approximately 32,591 persons (California Department of Finance [DOF] 2022). SBCAG's growth forecast estimates that the population in Goleta would increase from an existing population of 32,591 residents to 34,700 residents by 2050. In addition, the growth forecast estimates that jobs would increase from 25,580 jobs in 2020 to 31,070 jobs by 2050. The population in Goleta would increase by 2,109 residents by 2050, and the jobs in Goleta would increase by 5,490 jobs by 2050. Therefore, the addition of 5 employees and 13 new residents to Goleta would be accommodated in the City's growth forecasts, and Alternative 3 would not exceed SBCAG's growth forecasts of population and jobs for Goleta (SBCAG 2019).

In addition, in accordance with standard practices in the City, Alternative 3 would follow SBCAPCD fugitive dust control measures, in the *Scope and Content of Air Quality Sections in Environmental Documents*. For these reasons, Alternative 3 impacts would be less than significant, which would be similar to the proposed project

Threshold: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Construction

Alternative 3 would involve temporary and short-term construction emissions. Construction activities such as demolition, grading, construction worker travel to and from the project site, delivery and hauling of construction supplies and debris to and from the project site, hauling of import soil to the site, and fuel combustion by on-site construction equipment would generate air quality emissions.

Alternative 3 construction would be completed six months sooner than the proposed project. Table 6-10 summarizes construction emissions that would be generated from Alternative 3. Air quality modeling results for Alternative 3 are included in Appendix R-1. As shown in Table 6-10, construction emissions would not exceed the SBCAPCD construction thresholds used by the City of Goleta for this analysis. In addition, Alternative 3 construction would result in less construction emissions in 2028 compared to the proposed project, due to a shorter construction schedule and less building construction. Therefore, Alternative 3 would not contribute substantially to an existing or projected air quality violation. Impacts would be less than significant and would result in a lesser impact than the proposed project.

Table 6-10 Estimated Alternative 3 Annual Construction Emissions

	Annual Emissions (tons per year)					
Construction Year	**ROC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2027	<1	1	1	<1	<1	<1
2028	<1	<1	<1	<1	<1	<1
Overlap						
Utility Pipelines	<1	1	1	<1	<1	<1
Maximum Annual Emissions	**<1**	**2**	**2**	**<1**	**<1**	**<1**
Threshold	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: All emissions modeling was completed using CalEEMod. See Appendix R-1 for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulations (including SBCAPCD Rules 345, 323.1, and 329).

Operation

Operation of Alternative 3 would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Table 6-11 summarizes Alternative 3's operational emissions by emission source (area, energy, and mobile). As shown therein, the emissions generated by the operation of Alternative 3 would not exceed County operational thresholds used by the City of Goleta for this analysis. In addition, Alternative 3 operation would result in less operational emissions compared to

the proposed project due to less vehicle trips, fewer employees, and less intense land use. Therefore, Alternative 3 would not contribute substantially to an existing or projected air quality violation. Impacts would be less than significant and would result in a lesser impact than the proposed project.

Table 6-11 Estimated Alternative 3 Operation Emissions

	Maximum Daily Emissions (pounds per day)					
Emissions Source	**ROC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area	1	<1	3	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	<1	1	1	<1	<1	<1
Total	**1**	**1**	**4**	**<1**	**<1**	**<1**
Threshold (area + energy + mobile)	55	55	N/A	N/A	80	N/A
Threshold Exceeded?	No	No	N/A	N/A	No	N/A
Threshold (mobile only)	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Notes: All emissions modeling was completed using CalEEMod. See Appendix R-1 for modeling results. Some numbers may not sum precisely due to rounding. Emission data is pulled from "mitigated" results, which account for compliance with regulations (including SBCAPCD Rule 323.1) and project design features. Emissions presented are the highest of the winter and summer modeled emissions.

Threshold: Would the project expose sensitive receptors to substantial pollutant concentrations

Construction

Alternative 3 construction activities would result in temporary project generated DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. Alternative 3 construction is anticipated to begin in July 2027 and end in March 2028. Project construction would be phased, and each construction phase would be periodic and short-term. Construction-related TAC emissions would cease with the completion of construction activities. The detailed results of the construction HRA are provided in Appendix R-2 and summarized below.

The maximum unmitigated risk from construction of Alternative 3 was identified for all sensitive receptors within 1,000 feet of the project site boundary as detailed in Appendix R-2. The maximum off-site residential cancer risk would be 0.26 in one million at one of the mobile homes east of the project site across SR-217. In addition, the chronic risk at the maximum off-site receptor would be exposed to a hazard index of 0.02. These maximum cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or hazard index of 1 for chronic risk. In addition, Alternative 3 construction health risk would result in less health risk impacts compared to the proposed project due to a shorter construction schedule and less building construction. Given that neither the cancer risk nor the chronic risk would exceed regulatory thresholds, health risk from construction of the Alternative 3 would be less than significant and impacts would be less than the proposed project.

Operation

Alternative 3 would result in six less round trips per day compared to the proposed project and would generate approximately 8 trucks round trips per day (16 one-way trips) from the project site, based on ITE trip rates for High-Cube Transload and Short-Term Storage Warehouse for the outdoor/RV storage use and General Office for the office building (ITE 2021). The truck trips are assumed to all be diesel-fueled heavy-heavy-duty truck trips. An operational HRA was performed to conservatively estimate health risk during the Alternative 3's operating hours. The maximum unmitigated risk from operation of Alternative 3 would expose a sensitive receptor at the Winslowe townhomes to a cancer risk of 0.05 in one million, due to the receptor being adjacent to the truck route. In addition, the maximally exposed individual receptor chronic risk would have a hazard index of <0.0001, similar to the proposed project. These maximum operational cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or a hazard index of 1 for chronic risk. In addition, Alternative 3 operational health risk impact would be less than the proposed project due to less daily truck trips. Furthermore, Alternative 3 would generate 8 round truck trips per day, well below CARB's threshold of 100 diesel-fueled truck trips per day. Therefore, the Alternative 3 is consistent with CARB's siting recommendations for TAC emitting sources. Alternative 3 operations would not expose substantial TAC emissions to sensitive receptors. Impact would be less than significant and would have a lesser impact than the proposed project.

Combined Construction and Operation

The maximum unmitigated combined risk from construction and operation of Alternative 3 was identified for all sensitive receptors within 1,000 feet of the project site boundary and along the truck route on South Kellogg Avenue as detailed in Appendix R-2. The sensitive receptor across SR-217 at the mobile home park would be exposed to a cancer risk of 0.28 in one million. In addition, the residential receptor chronic risk would have a hazard index of 0.02. These maximum cancer and chronic risk estimates would not exceed the regulatory threshold of 10 in one million for cancer risk or 1 for chronic risk. Alternative 3 combined health risk would not exceed regulatory thresholds. Impacts would be less than significant and would have a lesser impact than the proposed project.

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

Alternative 3 would generate oil and diesel fuel odors during construction from equipment use. The odors would be limited to the construction period and would be intermittent and temporary. The duration of odor emissions would be 9 months, which is less than the 15 month construction duration of the proposed project. Furthermore, these odors would dissipate rapidly with distance from in-use construction equipment. Accordingly, construction of Alternative 3 would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people. Impacts would be less than significant, and less than the proposed project.

Alternative 3 includes an outdoor storage use and would not include development associated with odor complaints near sensitive receptors. In addition, it is likely that odors would not be distinguishable due to vehicle exhaust on State Route 217. Therefore, operation of Alternative 3 would not generate other emissions, such as those leading to odors, that would affect a substantial number of people. Operational odor impacts would be less than significant, similar to the proposed project.

c. Biological Resources

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

Belding's Savannah Sparrow and Nesting Birds

Alternative 3 would be located on the same project site, and in the same location on the project site, as the proposed project and therefore would have a similar potential to directly or indirectly affect similar candidate, sensitive, and special-status species. Foraging special-status birds, including the special-status BSS and loggerhead shrike, have a low potential to be present as transients on the project site. Similar to the proposed project, Alternative 3 would not directly impact these species because they are mobile and would move away from construction or operational disturbance.

Although no BSS have been observed in the study area during field surveys, construction of Alternative 3 has the potential to indirectly impact BSS, in the event they are nesting in pickleweed habitat in Old San Jose Creek or San Jose Creek. Similar to the proposed project, Alternative 3 would have the potential to indirectly impact BSS due to disturbance from construction noise and vegetation clearing activities, which would be a potentially significant impact, requiring mitigation. In addition, construction of Alternative 3 has the potential to result in direct and indirect impacts to non-special status nesting birds protected under the Migratory Bird Treaty Act if they are nesting within the project site and/or immediate vicinity during construction activities. Direct impacts including the destruction of nests and mortality of eggs, nestlings, and birds would occur if active nests were present within the project site during clearing and grading. Indirect impacts could also occur if active nests are located in the project site and vicinity and are abandoned due to visual and acoustic construction -related disturbance. This impact would be potentially significant, requiring mitigation. Alternative 3 would require implementation of Mitigation Measures BIO-1 and BIO-2, which would establish avoidance buffers around nests during construction in the nesting season and require focused surveys and avoidance of BSS for ground disturbance during the BSS nesting season. With implementation of Mitigation Measures BIO-1 and BIO-2, Alternative 3 would have a less than significant impact on nesting birds, similar to the proposed project.

Operation of Alternative 3 would result in reduced operational noise levels in comparison to the proposed project and therefore operation of Alternative 3 would not result in excessive ambient noise and therefore would not indirectly disturb bird species. Similar to the proposed project, Alternative 3 would include landscaping consisting of native California riparian and upper wetland habitat which would provide visual screening from pickleweed habitat where the BSS could be present. Therefore, operation of Alternative 3 would have a less than significant impact on candidate, sensitive, and special-status species, similar to the proposed project.

Tidewater Goby and Steelhead

Similar to the proposed project, noise and vibration from construction of Alternative 3 could result in temporary impacts to individual tidewater gobies and steelhead. However, work within the San Jose Creek channel would be completed using hand tools and concrete saws and heavy vibration equipment would not be utilized which would minimize vibration from construction. Alternative 3 would require implementation of Mitigation Measure NOI-1, which requires use of a sound barrier at

the edge of San Jose Creek. Implementation of this measure would minimize the potential for construction noise to disturb tidewater goby and steelhead, similar to the proposed project.

Construction of Alternative 3 would be carried out in accordance with a SWPPP, which is required to include the use of BMPs to control stormwater pollutants. However, even with implementation of the SWPPP, construction of Alternative 3 could result in impact from fuel, oil, lubricants, paints, release agents, and other construction materials; erosion; increased turbidity; excessive sedimentation; and accidental fuel spills during construction could also lead to contamination of soils and habitat degradation. Alternative 3 would require implementation of Mitigation Measure BIO-3 which requires implementation of a Toxic Materials Control and Spill Response Plan for materials that may be used/stored on-site, such as petroleum-based products, fuel and lubricants, and other potentially toxic materials. Implementation of Mitigation Measure BIO-3 would reduce Alternative 3's potential to impact tidewater goby and steelhead from the release of construction materials to a less than significant level, similar to the proposed project.

Similar to the proposed project, construction of Alternative 3's drainage outfall in the San Jose Creek Channel has the potential to directly affect aquatic habitat and species, including for tidewater goby and steelhead. Alternative 3 would require dewatering the work area which could injure or kill these species, or could increase turbidity and affect juvenile steelhead. Construction of Alternative 3's drainage outfall would take three to four weeks to complete and would be scheduled to avoid peak high tides if the Goleta Slough mouth is open. No heavy equipment would be used or operated within this staging area in the creek bed. Crews would use hand tools (i.e., shovels, rakes and brooms, dust pans, and wheelbarrows) to collect and remove any debris that falls or washes into the staging area. A crane would lower sandbags and plastic sheeting into the creek bed to create a temporary cofferdam to prevent water from entering the work area. The cofferdam used for Alternative 3 would be a physical barrier that would prevent high tides and aquatic species from entering the work area. Similar to the proposed project, installation of Alternative 3's cofferdam could potentially result in impacts to tidewater goby and steelhead if improperly installed. Alternative 3 would require implementation of Mitigation Measure BIO-3, which would ensure the cofferdam would be installed during the dry season and removed after concrete has cured prior to coming into contact with tidal surface water. With implementation of Mitigation Measure BIO-3, impacts associated with construction of Alternative 3's drainage outfall would be reduced to a less than significant impact on tidewater goby and steelhead, similar to the proposed project.

Alternative 3 would include the same sized detention basin as the proposed project to detain and treat stormwater flows. Operation of Alternative 3 could result in similar impacts to San Jose Creek as the proposed project from the introduction of a new outfall structure and reduction in the stormwater flows into the creek from increased onsite detention. The detention basin would retain stormwater flows and treat pollutants in compliance with the County's adopted *Stormwater Technical Guide for Low Impact Development* guidelines which is designed to ensure post-construction requirements described in the Central Coast Regional Water Quality Control Board's (RWQCB) *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region* are satisfied. Implementation of Alternative 3 conducted in compliance with applicable regulatory requirements related to stormwater runoff would minimize the potential for pollutants to degrade water quality. Operation of Alternative 3's drainage outfall would not affect the physical or biological habitat features essential to migrating adult steelhead (e.g., water quantity to allow for juvenile and adult mobility; cover, shelter, and holding areas; and adequate water quality) or the tidewater goby (e.g., water depth, substrate, and seasonally open sandbar mouth). No long-term effect would occur to steelhead habitat since the in-creek work is the replacement of existing concrete

in-kind, similar to the proposed project. Given the volume of water present in the creek during storm events, the size of the watershed, and volume of flood flows and daily tidal shifts (when the Goleta Slough mouth is open), Alternative 3's stormwater flows would not substantially impact tidewater goby and steelhead individuals or San Jose Creek habitat. The drainage outfall design would be subject to similar regulatory requirements as the proposed project, such as USFWS and NMFS consultation, and USACE 404 Certification. Similar to the proposed project, compliance with required permits would reduce Alternative 3's operational impact to tidewater goby and steelhead to a less than significant level.

California Red-Legged Frog and Western Pond Turtle

Due to similar construction activities as the proposed project, construction of Alternative 3 would have a potential to kill or injure California red-legged frog and western pond turtle. If present, injury or mortality could occur through accidental crushing, either by construction equipment or foot traffic from workers. Displacement from cover due to construction could expose these species to predators and desiccation. Additionally, amphibians or reptiles moving through the construction area could become trapped in open trenches left overnight. The initial construction noise and disturbance may also indirectly impact species, if present in the San Jose Creek and Old San Jose Creek corridor, by altering their migration behaviors. Alternative 3 would require implementation of Mitigation Measure BIO-4 and BIO-5, which would require preconstruction surveys and biological monitoring throughout construction and avoidance and relocation of California red-legged frog and western pond turtle, if found. With implementation of Mitigation Measure BIO-4, Alternative 3's construction impacts to California red-legged frog and western pond turtle would be reduced to a less than significant level, similar to the proposed project.

Operation of Alternative 3 and the proposed project would not occur within California red-legged frog or western pond turtle habitat and would be limited to the developed portion of the project site. Therefore, operation of Alternative 3 would have a less than significant impact on California red-legged frog and western pond turtle, similar to the proposed project.

Insects and Bats

Construction of Alternative 3 has a similar potential as the proposed project to result in direct effects to special-status insects (monarch butterfly and Crotch bumble bee) if present during vegetation clearing. The potential is low that either the foraging monarch butterfly or Crotch bumble bee would be present at the initiation of construction since the coastal sage scrub foraging habitat on-site lacks preferred host plants, is limited in size, was previously developed, and surrounded by disturbance. Furthermore, due to the expanse of food sources and habitat south of the project site in the Goleta Slough and along the coast, the removal of marginal disturbed native shrubland would not substantially impact regional nectar sources. Alternative 3's operation would not affect these insect species given that noise and dust would not be above existing ambient levels, lighting would be shielded, and vegetative screening would reduce glare. Therefore, Alternative 3 would have a less than significant impact on special-status insects, similar to the proposed project.

Special-status bat species (Pallid bat, Townsend's big-eared bat, Western red bat, and Western mastiff bat) have a low potential to forage over the project site. Alternative 3's construction would not interfere with nocturnal foraging behavior by bats as no nighttime construction would be required. Existing project site buildings are sealed and maintained and are not expected to host bat roosts; therefore, demolition would not directly impact bat roosts. Because of the low potential for bats to

occur at the project site, Alternative 3 would have a less than significant impact on special-status bats, similar to the proposed project.

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

Alternative 3 would be located on the same project site as the proposed project and therefore would include similar vegetation. No sensitive communities are present on the project site; therefore, Alternative 3 would not result in direct impacts on sensitive communities or ESHA communities.

Sensitive communities and ESHA that could be indirectly affected are found in San Jose Creek and Old San Jose Creek. Alternative 3's construction activities would result in less overall dust generation, introduction of fuel spills, and introduction of invasive species as the proposed project due to a reduced construction schedule; however, these could still indirectly impact sensitive communities and ESHA communities adjacent to the project site. Dust impacts would be addressed through adherence to Santa Barbara County Air Pollution Control District requirements. Alternative 3's fuel spill impacts would be reduced to a less than significant level with implementation of Mitigation Measure BIO-3, similar to the proposed project. Similar to the proposed project, Alternative 3's potential impacts related to invasive species would be reduced to a less than significant level with implementation of Mitigation Measures BIO-5, BIO-6, and BIO-7, which requires biological monitoring, prohibits non-native invasive species from being used as landscaping, and requires implementation of an Invasive Species Control Plan, respectively.

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

Alternative 3 would include similar construction activities as the proposed project and would therefore have a similar potential to result in temporary impacts to jurisdictional wetland features. Construction of the drainage outfall and use of cofferdam could damage wetlands habitat; however, Alternative 3 would require implementation of Mitigation Measure BIO-3 which would ensure construction of the drainage outfall and use of the cofferdam occurs during the dry season. Implementation of Mitigation Measure BIO-3 would reduce Alternative 3's indirect construction impacts on wetlands to a less than significant level. Implementation of Mitigation Measure BIO-5, requiring construction monitoring with 100 feet of ESHA, and Mitigation Measure BIO-8, requiring the construction contractor to install fencing around the ESHA and requiring replacement of ESHA habitat if temporary or permanent impacts occur during construction, would reduce Alternative 3's potential to directly impact wetlands to a less than significant level. Implementation of Mitigation Measures BIO-6 and BIO-7, prohibiting invasive and exotic species, would reduce Alternative 3's potential impacts to wetlands due to the introduction of invasive species to a less than significant level, similar to the proposed project.

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

Alternative 3 would be located at the same project site as the proposed project and therefore would have a similar potential to result in interference with fish and wildlife migration. Construction of

Alternative 3 would adhere to typical working hours and noise would not affect terrestrial nocturnal mammal wildlife movement, which is most pronounced during dusk, nighttime, and dawn.

Approximately 170 feet west of the project site, Old San Jose Creek is mapped as a wildlife migration corridor for terrestrial and avian species. The Old San Jose Creek corridor is 300 feet from the structure in the development area and 40 feet from the utility trenching and would be subject to at least 75 decibels[5] of construction noise. Alternative 3's construction noise would generate similar noise at Old San Jose Creek as the proposed project, which would not result in a significant impact to Old San Jose Creek avian habitat within 300 feet of project construction during breeding season. Outside the breeding season, the initial increase in construction noise would cause bird species to permanently relocate to adjacent habitat, where they would not be affected by construction noise. Alternative 3 would implement Mitigation Measure NOI-1 which would reduce short-term noise construction impacts to wildlife movement in the San Jose Creek to a less than significant level. Alternative 3 would require implementation of Mitigation Measure BIO-1, which would reduce potential impacts to migratory birds to a less than significant level, similar to the proposed project. Therefore, similar to the proposed project, construction of Alternative 3 would have a less than significant impact on migration with mitigation incorporated.

As described in the Alternative 3 *Noise* discussion, Alternative 3 would create less operational noise at the project site compared to the proposed project and therefore would not substantially impact wildlife movement due to operational noise. Due to the vegetation buffers between the San Jose Creek and the outdoor storage area, Alternative 3 would not substantially impact wildlife movement due to the introduction of the new uses and human presence. As with the proposed project, Alternative 3's lighting would be contained on the project site and therefore would not substantially interfere with wildlife movement in San Jose Creek or Old San Jose Creek due to lighting. Alternative 3 would include the same amount of landscaping as the proposed project and therefore result in the same potential to result in adverse effects on wildlife and habitat from the use of pesticides (including rodenticides), herbicides, and fertilizers, as the proposed project. Alternative 3 would require implementation of Mitigation Measures BIO-6, BIO-7, and BIO-9, which would reduce Alternative 3's impact on migratory wildlife from landscaping to a less than significant level, similar to the proposed project.

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

Alternative 3 would be located on the same project site, in the same location, as the proposed project. Similar to the proposed project, Alternative 3 would be consistent with General Plan Policies CE 2, CE 3, CE 5, CE, 6, and CE 8 with implementation of Mitigation Measures BIO-1 through BIO-9. The City's Conservation Element Policy CE 2.2, *Stream Protection Areas* requires a 100-foot setback in San Jose Creek and portions of Old San Jose Creek. In addition Policy CE 2.6 requires the restoration of degraded creeks in Goleta. Similar to the proposed project, Alternative 3 would include a request to reduce the SPA buffer to 25 feet.

The existing development on the project site, 25 feet west of the channelized creek top-of-bank, includes the 20-foot Santa Barbara County Flood Control District dirt road and easement, concrete creek access ramp, ice plant, ruderal vegetation, and chain link and wooden fencing at the 25-foot boundary. From 25 to 100 feet of the channelized creek top-of-bank, existing development on the project site includes the asphalt access driveway, the movie screen with laurel sumac shrubs, fallow

[5] Based on a 400-foot distance to 908 South Kellogg Avenue under Section 4.11 Table 4.11-7 and this distance under Table 4.11-11 in Section 4.11, *Noise*.

landscape, and deteriorating asphalt formerly used as vehicle parking for the drive-in movie theater. Given the lack of creek channel streamside vegetation and project site buffer vegetation, impacts to streamside vegetation would be less than significant.

The biotic quality and function of the San Jose Creek SPA on the project site and in the development area is impaired by altered hydrology, existing compaction and disturbance, State Route 217, and the concrete creek channel. The function and value of the San Jose Creek for regional terrestrial and semi-aquatic wildlife movement is compromised due to a lack of vegetation. However, the channelized creek provides aquatic habitat and the area within the 100-foot buffer may be used by foraging avian and other mobile species. Wildlife, such as birds and raptors, are sensitive to disturbance and would not be able to use the stream area as effectively if new development and uses are sited within the buffer. Pollutants and other human-related stressors such as trash associated with Alternative 3 could be exposed to wildlife from the stream. This SPA buffer reduction to 25 feet would substantially increase existing adverse effects on wildlife which utilize the SPA. In addition, the reduction in SPA buffer would eliminate the potential for restoration of San Jose Creek as directed in Policy CE 2.2. Alternative 3's construction and operational impacts on the biotic quality of the SPA from a buffer reduction to 25 feet would therefore be potentially significant. In addition, new development and uses not otherwise allowed in the SPA buffer would eliminate the potential for preservation in a natural state envisioned under Policy CE 2.2 and restoration directed under Policy CE 2.6. As with the proposed project, no feasible mitigation measures are available that would reduce the impact from development inconsistent with Policy CE 2.2 and Policy CE 2.6 to a less than significant level. Therefore, Alternative 3's impact related to conflicts with Policy CE 2.2 and CE 2.6 would remain significant and unavoidable, similar to the proposed project.

Threshold: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Alternative 3 would be located on the same project site as the proposed project. The project site is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. Therefore, Alternative 3 would have no impact related to conflicts with these plans, which is the same as the proposed project.

d. Cultural Resources

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

Alternative 3 would be located on the same project site as the proposed project which does not contain any historical resources. Alternative 3 would have no impact on historical resources, which is the same as the proposed project.

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

Alternative 3 would be located on the same project site as the proposed project. The 2017 *Archaeological Resources Assessment* completed to evaluate the project site concluded there is no potential for archaeological cultural resources to exist within the project site. Alternative 3 would not substantially affect archaeological resources, and this impact would be less than significant, which is the same as the proposed project.

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

Because Alternative 3 would be located on the same project site as the proposed project, Alternative 3 would have a similar, low likelihood of encountering human remains. In the event of unanticipated discovery of human remains during construction, the construction contractor would be required to comply with the State of California Health and Safety Code Section 7050.5 which requires that all construction activities halt in the vicinity of the discovery and the County Coroner be contacted immediately. The County Coroner would make a determination of origin and disposition of the human remains pursuant to Public Resources Code Section 5097.98, including identification of a most likely descendent to provide recommendations if human remains are determined to be prehistoric. With compliance with existing regulations prescribed in the State of California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.8, Alternative 3's impacts to human remains would be less than significant, which is the same as the proposed project.

e. Energy

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

Construction

Alternative 3 would be constructed 6 months faster than the proposed project and therefore would require less use of heavy-duty vehicles and construction equipment and less worker travel. Alternative 3's construction activities would require approximately 1,624 gallons of gasoline and 24,258 gallons of diesel fuel (Appendix R-3). These construction fuel requirements are 1,101 gallons of gasoline and 14,922 gallons of diesel fuel less than the proposed project. Therefore, construction of Alternative 3 would result in less energy consumption in comparison to the proposed project. Alternative 3's fuel use during construction represents approximately 0.001 percent of the annual gasoline use and approximately 0.1 percent of the annual diesel use in Santa Barbara County (See Table 4.5-1 in Section 4.5, *Energy)*. Similar to the proposed project, Alternative 3's project contractors would be required to comply with the provisions of the California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Heavy-duty equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Adherence to regulatory requirements would ensure construction of Alternative 3 would not involve the wasteful, inefficient, or unnecessary use of energy. Impacts would be less than significant, and less than the proposed project.

Operation

Alternative 3 would include an 70,594 sf outdoor storage facility on the same project site as the proposed project. The storage areas would be used for construction materials storage and RV storage and would include a 500 square-foot office building. During operation, Alternative 3 would require approximately 5,196 gallons of gasoline, 3,109 gallons of diesel fuel, 15 megawatts of electricity, and 133 therms of natural gas annually (Appendix R-3). In comparison to the proposed project, Alternative 3 would require 8,768 less gallons of gasoline, 2,437 less gallons of diesel, 773 less megawatts of electricity, and 1,261 less therms of natural gas annually. This fuel use represents

approximately 0.003 percent of the annual gasoline use, 0.01 percent of annual diesel use, 0.005 percent of annual electricity use, and 0.0001 percent of natural gas use in Santa Barbara County. Similar to the proposed project, Alternative 3's electricity would be supplied by 3CE using 100 percent renewable electricity sources. Similar to the proposed project, Alternative 3 would comply with standards set in California Building Code Title 24, including CALGreen and the California Building Energy Efficiency Standards. Compliance with these standards would minimize Alternative 3's potential to result in the wasteful, inefficient, or unnecessary consumption of energy. During operation, trucks entering and existing the project site would limit idling to five consecutive minutes in accordance with California Code of Regulations Title 13 Section 2485 which would minimize energy use of trucks entering and exiting the project site. With the implementation of applicable energy efficiency measures, Alternative 3 would minimally increase energy demand and petroleum demand due to the development of Alternative 3, compared with existing conditions. Operation of Alternative 3 would not result in substantial adverse environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Impacts would be less than significant, and less than the proposed project.

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

The City's CAP, Strategic Energy Plan, General Plan, and Municipal Code contain measures intended to increase energy efficiency and expand the use of renewable energy in Goleta Similar to the proposed project, Alternative 3 would comply with CALGreen and the Building Energy Efficiency Standards. Alternative 3 would implement LED lighting, and indoor water use efficiency measures to limit the energy consumption necessary for operation of Alternative 3 and assist to meet the City's renewable energy goals. Furthermore, Alternative 3 would be supplied electricity by 3CE using 100 percent renewable electricity consistent with the measures of the CAP, Strategic Energy Plan, General Plan, and Municipal Code to expand the use of renewable energy in Goleta.

Alternative 3's design would include a minimum of 9 parking spaces, which would be comprised of one parking space reserved for EVs and eight parking spaces available for both EV and gasoline-powered vehicles. Alternative 3's parking design would be required to comply with the CALGreen intervening code update and the City's EV Reach Code for new construction. Accordingly, Alternative 3 would not conflict with state or local EV parking requirements, similar to the proposed project.

Similar to the proposed project, Alternative 3 would also include bicycle parking space for the office use and would connect to existing bicycle facilities in Goleta, encouraging the use of alternative modes of transportation and a reduction in vehicle fuel consumption. These design features would ensure Alternative 3 would not conflict with or obstruct the City's CAP, Strategic Energy Plan, General Plan, or Municipal Code. As stated above, Alternative 3, similar to the proposed project, would be supplied electricity by 3CE using 100 percent renewable electricity which would ensure that Alternative 3 would be consistent with the requirements of Senate Bill 100. Therefore, Alternative 3 would have a less than significant impact related to conflicts with or obstruction of a state or local plan for renewable energy or energy efficiency, similar to the proposed project.

f. Geology and Soils

Threshold: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as

delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Alternative 3 would be located on the same project site as the proposed project and therefore would have a similar impact related to geologic hazards, including fault rupture, as the proposed project. No active or potentially active faults are located on the project site, and therefore the potential for surface fault rupture to occur is low. Therefore, Alternative 3 would have no impact involving fault rupture, which is the same as the proposed project.

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

The project site is located in a region of high seismic activity, with the potential for large seismic events that could generate strong ground shaking. Alternative 3's office building would be designed to consider seismic loads, as required by the CBC. Similar to the proposed project, Alternative 3 would also require implementation of Mitigation Measure GEO-1 which would require incorporation of building foundation recommendations into the design of Alternative 3 to minimize the risk of loss, injury, or death involving seismic ground shaking. Implementation of Mitigation Measure GEO-1 would reduce Alternative 3's impact related to seismic ground shaking to a less than significant level, similar to the proposed project.

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

and

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

The project site is not at risk of landslides, lateral spreading, or collapse. Both liquefaction and settlement are potential concerns for project site soils. During an earthquake-induced liquefaction event, the total vertical movement of the ground surface could reach approximately 4 inches, while the variation in settlement between different areas or structures within the affected zone could be up to approximately 2 inches. Additionally, if dry sand on the project site is subjected to seismic activity, the total vertical movement of the ground surface could reach approximately 2 inches. Similarly, the variation in settlement between different areas or structures within the affected zone could be up to approximately 1 inch. As with the proposed project, settlement resulting from liquefaction and seismic activity may damage Alternative 3's office building foundation. Alternative 3 would require implementation of Mitigation Measure GEO-1 which would reduce Alternative 3's potential impacts due to liquefaction resulting in settling of soils on the project site to a less than significant level, similar to the proposed project.

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

The project site is not located in a landslide hazard area and is not subject to landslide risk. Alternative 3 would have no impact involving landslides, which is the same as the proposed project.

Threshold: Would the project result in substantial soil erosion or the loss of topsoil?

Construction

Project site soils are highly erodible. Alternative 3 would require the same amount of grading as the proposed project which would increase the potential for erosion and sedimentation. If grading activities occur during the rainy season, or in the event of heavy storms, soils from the site could be entrained, eroded, and transported off-site.

Similar to the proposed project, construction of Alternative 3 would comply with the requirements of the Construction Stormwater General Permit and the construction contractor would implement a SWPPP to control the discharges of pollutants to control the discharges of pollutants, including sediment, into local surface water drainages. The SWPPP prepared for Alternative 3 would include information on BMPs that would be used during construction to retain sediment on-site, minimize erosion, and utilize vegetation for erosion control, as well as a summary of precautionary measures to be taken to ensure vehicle use does not result in erosion, pursuant to the requirements of Chapter 15.09 of the City's Municipal Code. As with the proposed project, soils on the project site are highly erodible and construction of Alternative 3 could result in substantial erosion. Alternative 3 would require implementation of Mitigation Measure GEO-1 which would require incorporation of drainage and grading recommendations into Alternative 3 to reduce soil erosion on-site. Similar to the proposed project, Alternative 3's construction-related impacts to soil erosion would be less than significant with mitigation incorporated.

Operation

During operation of Alternative 3, runoff generated from storm events may transport sediment off-site and contribute to project site erosion and the loss of topsoil. However, similar to the proposed project, Alternative 3's design would be required to meet the same regulatory requirements as the proposed project to reduce erosion. These requirements include the standards of the Central Coast RWQCB's *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region and the County's Stormwater Technical Guide for Low Impact Development*. Alternative 3 would comply with the Phase II MS4 Permit which requires that a SWQMP be prepared for projects that create and/or replace 5,000 or more square feet of impervious surface. SWQMPs specify the operational BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. However, soils on the project site would remain highly erodible, requiring implementation of long-term maintenance activities to ensure proper drainage and the stabilization of surface soils are necessary to reduce the potential of erosion damage during operation. Alternative 3 would require implementation of Mitigation Measure GEO-1 which would incorporate drainage and grading recommendations into Alternative 3. Similar to the proposed project, Alternative 3's operational impacts related to soil erosion would be less than significant with mitigation incorporated.

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

Soils on the project site are non-expansive. Alternative 3 would not create substantial direct or indirect risks to life or property due to expansive soils and no impact would occur, which is the same as the proposed project.

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

Similar to the proposed project, Alternative 3 would include an underground sewer line that would connect to an existing sewer line located underneath South Kellogg Avenue. Sewer services at the project site would be provided by the Goleta Sanitary District. Alternative 3 would not involve the use of septic tanks or alternative wastewater disposal systems and, as with the proposed project, no impact would occur.

Threshold: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are no documented paleontological resources at the project site. The project site is primarily underlain by fill soils that reach approximately 4 feet in depth. The geologic unit that underlies the project site, Holocene and upper Pleistocene (Quaternary-era) alluvium and colluvium (Qac), has a low paleontological sensitivity. Similar to the proposed project, grading activities for Alternative 3 would be unlikely to encounter previously unidentified paleontological resources due to the low paleontological sensitivity of the geologic unit underlying the project site. Accordingly, Alternative 3 would have a less than significant impact on paleontological resources, similar to the proposed project.

g. Greenhouse Gas Emissions

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

Construction Emissions

Alternative 3 would involve construction and operation of an outdoor/RV storage area, office building, and parking lot. Alternative 3 construction would generate temporary GHG emissions from operation of construction equipment on-site, and vehicles transporting construction workers to and from the project site and heavy trucks to transport soil import, building, concrete, and asphalt materials. As shown in Table 6-12, construction associated with Alternative 3 would generate 447 MT of CO_2e, a decrease of 152 MT of CO_2e compared to the proposed project. Amortized over a 50-year period, construction associated with the Alternative 3 would generate 9 MT of CO_2e per year. Greenhouse gas modeling results for Alternative 3 are included in Appendix R-1.

Table 6-12 Construction GHG Emissions – Alternative 3

Year	Emissions (MT of CO_2e)
2027	258
2028	63
Utility Pipelines	126
Total	**447**
Amortized over 50 years	**9**

MT = metric tons; CO_2e = carbon dioxide equivalents

Source: CalEEMod worksheets in Appendix R-1. See Table 2.3, "Construction Emissions by Year, Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

Alternative 3 GHG emissions from worker trips to and from the site would be approximately 0.3 MT of CO_2e per year when amortized over the project life. In other words, construction worker trips would represent less than four percent of the total construction emissions. Therefore, GHG emissions from worker trips during construction activity would be minimal.

Operational and Total Emissions

Operation of Alternative 3 would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, vehicle trips (employee and warehousing activities), and wastewater and solid waste generation. The implementation of nine EV charging stations would reduce gasoline GHG emissions per year, as shown in Table 6-13. Approximately 352,125 VMT per year would be reduced from the nine EV charging stations. Alternative 3's gasoline GHG emissions would be approximately 81 MT of CO_2e per year[6] (based on employee and storage activities), and the GHG emissions from electric vehicles would be approximately 0 MT of CO_2e per year, since Alternative 3 would be supplied with 100 percent carbon free electricity. Therefore, installing nine parking spaces with EV charging stations would reduce mobile GHG emissions by 81 MT of CO_2e per year. Annual operational emissions resulting from Alternative 3 are summarized in Table 6-13. The annual operational GHG emissions are combined with the amortized construction emissions. Alternative 3 would emit approximately 4 MT of CO_2e per year or 0.80 MT of CO_2e per employee per year (5 employees), which is less than the proposed project. Therefore, Alternative 3 would not exceed the County's Environmental Thresholds and Guidelines Manual GHG efficiency threshold for a nonresidential use of 2.63 MT CO_2e per employee per year. Therefore, Alternative 3 would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and impacts would be less than significant. Impacts would be less than the proposed project.

[6] GHG emissions from gasoline vehicles = (352,125 reduced VMT per year*240 grams of CO_2e per mile*1^{-6} MT per gram)

Table 6-13 Combined Unmitigated Annual GHG Emissions-Alternative 3

Emission Source	Annual Emissions (MT CO_2e)
Construction[1]	**9**
Operational	**(5)**
Area	1
Energy	1
Mobile	74
EV Charging Stations	(81)
Solid Waste	<1
Water, Wastewater	<1
Total	4
Total GHG per Service Population[2]	**0.8**
Santa Barbara County GHG Service Population Criterion for Nonresidential Land Uses	2.63 MT of CO_2e per service population per year
Exceeded?	**No**

MT CO_2e = metric tons of carbon dioxide equivalent.

Note: parenthetical values are negative numbers and are subtracted from the total emissions rather than added.

Source: CalEEMod worksheets and EV charging station worksheets are in Appendix R-1. See Table 2.6 "Operations Emissions by Sector, Mitigated" emissions. Annual emissions results are shown for all emissions. The mitigated emissions account for project sustainability features and/or compliance with specific regulatory standards.

[1]Construction emissions were amortized by 50 year project lifetime.

[2]The project would add approximately 5 employees.

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

2022 Scoping Plan

The State's 2022 Scoping Plan aims to achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. The Scoping Plan's Appendix D, Local Actions, provides suggestions for on-site GHG-reducing design features, methods to reduce VMT and support building decarbonization, access to shared mobility services or transit, and EV charging. It does not address other land use types such as industrial. The Scoping Plan's Transportation Electrification priority area supports an EV fleet, which Alternative 3 would allocate at least nine EV charging stations, and would be served by 3CE Prime option, which would supply 100 percent carbon free electricity to the project site. The Scoping Plan's VMT Reduction priority area supports increased access to public transit and walking, development located on infill sites, and development that does not result in the loss or conversion of natural and working lands. Alternative 3 is an infill development in an urban area that would not convert natural lands and would contribute to the job and housing balance. The City anticipates residential and work-based projects in these areas would generate low VMT because of the higher density of existing residential and commercial uses and increased transit access relative to other areas of the City. These features allow for shorter vehicle trip lengths and promote the use of alternative transportation in these areas. Alternative 3 would be consistent with the State's long-term climate goals of carbon neutrality by 2045, similar to the proposed project.

SBCAG 2050 RTP/SCS

The SBCAG 2050 RTP/SCS demonstrates that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years. The Environment Objective 1 of the RTP/SCS is to "promote better balance of jobs and housing to reduce long-distance commuting" (SBCAG 2021). Alternative 3 would site new jobs within close proximity to residents within the urban boundary of Goleta and therefore would be consistent with Objective 1. Furthermore, in support of Environment Objective 5 of "reduce vehicle miles traveled," the surrounding area is anticipated to generate low VMT because of the higher density of existing residential and commercial uses and increased transit access near the site. Therefore, these features would allow for shorter vehicle trip lengths and promote alternative modes of transportation, such as bicycling and transit. Alternative 3 would be consistent with the 2050 RTP/SCS, similar to the proposed project.

City of Goleta General Plan

The City General Plan addresses recently emerging topics of climate change and alternative energy. The general plan lists several policies as part of its Transportation and Conservation Element that support GHG emission reductions. Alternative 3 would be consistent with Policy CE-15.3 of the Conservation Element by incorporating water efficient appliances to reduce water consumption for landscaping, plumbing, and irrigation consistent with the latest Title 24 Green Building Code and Building Energy Efficiency Standards. In addition, the Alternative 3 would be consistent with the City's Policy TE-1.1, Alternative Modes, by incorporating ten bicycle parking spaces, which could promote alternative modes of transportation for the residential uses within half a mile of the site. In addition, Alternative 3 site is within half a mile of the Santa Barbara Metropolitan Transit District Route 6 and 11 on Fairview Avenue west of Alternative 3 site. Therefore, Alternative 3 would be consistent with the goals and policies in the City of Goleta General plan to increase water efficiency, and potentially reduce the amount of motor trips with connectivity to surrounding neighboring residents, similar to the proposed project.

City of Goleta Climate Action Plan

The City's CAP contains policies and programs targeting energy efficiency policy. Alternative 3 would be consistent with the CAP measures, such as building designed and equipped with features that conserve and reduce energy consumption. Alternative 3 would be consistent with the latest Title 24 Building Energy Efficiency Standards for solar readiness for nonresidential land uses, which would align with Policy RE-1. In addition, would construct ten bicycle parking spaces, which could promote alternative modes of transportation with several residential uses within half a mile of the site, aligned with Policy T-8 of City's Climate Action Plan. Alternative 3 would be consistent with the goals outlined in the CAP, similar to the proposed project.

h. Hazards and Hazardous Materials

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

Construction

Construction of Alternative 3 would result in similar temporary increases in the regional transport, use, and disposal of construction-related hazardous materials and petroleum products as the proposed project. These activities would be subject to applicable federal, State, and local regulations

established by the United States Environmental Protection Agency USEPA, State of California, the County of Santa Barbara, and the City of Goleta for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. During construction of Alternative 3, existing on-site hazardous materials and waste would also be carried out in compliance with applicable federal, State, and local regulations, which would minimize potential impacts associated with the transport and disposal of these substances. Additionally, compliance with the Construction Stormwater General Permit would require implementation of Good Housekeeping BMPs to reduce potential impacts associated with hazardous materials spills. Similar to the proposed project, compliance with existing regulations governing transport, use, and disposal of hazardous materials would ensure construction of Alternative 3 would have a less than significant impact related to the routine transport, use, or disposal of hazardous materials during construction.

Operation

Alternative 3 would involve the operation of an outdoor storage facility for construction materials and RVs rather than industrial operations and is therefore generally anticipated to require less transport, use, and disposal of hazardous materials in comparison to the proposed project. All hazardous material transport, use, or disposal associated with the proposed industrial warehouse and office space would comply with existing hazardous materials regulations established by the U.S. EPA, the State of California, the County of Santa Barbara, and the City of Goleta. These regulations prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce risk of spills. Similar to the proposed project, compliance with these regulations would ensure Alternative 3's operational impacts related to the transport, use, and disposal of hazardous materials would be less than significant.

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

Construction

Alternative 3 would be located on the same project site as the proposed project and therefore contain similar potential hazards, including ACM and LBP in existing buildings, potential contaminated surficial soils, and potentially contaminated groundwater.

Construction of Alternative 3 would require demolition of existing drive-in theater structures, which could potentially contain ACM and LBP. Demolition and construction activities would be required to adhere to Cal/OSHA regulations regarding asbestos and lead-based paint materials. The CCR requires testing, monitoring, containment, and disposal of lead-based materials (CCR Title 8, Section 1532.1) and asbestos (CCR Title 8, Section 15129). However, given the likelihood for the presence of ACM and LBP, demolition could result in a potentially significant release of ACM and LBP. Alternative 3 would require implementation of Mitigation Measures HAZ-1 and HAZ-2 in order to reduce potential impacts associated with ACM and LBP release to a less than significant level, similar to the proposed project.

In addition, construction could potentially disturb hazardous materials in surficial soil to the west of the existing concession stand, leading to an accidental release of hazardous materials that could impact both construction workers and the environment. Based on the depth to groundwater, it is reasonable to assume that groundwater could be encountered during grading activities and groundwater dewatering would be required during construction. Similar to the proposed project, Alternative 3 would comply with an individual NPDES permit, waste discharge, or Limited Threat

Discharge Permit, to ensure proper treatment and disposal. However, given the likelihood for contamination, Alternative 3 would require implementation of Mitigation Measures HAZ-3 through HAZ-5 which, similar to the proposed project, would reduce potential impacts associated with the accidental release of hazardous materials to a less than significant level.

Operation

Operation Alternative 3 would involve minimal handling of hazardous materials, and is anticipated to require less transport, use, and disposal of hazardous materials in comparison to the proposed project because Alternative 3 would only be used for storage and office uses. Alternative 3's operational activities would comply with applicable federal, State, and local regulations, which prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce the risk of accidental spills. Therefore, operation of Alternative 3 would have a less than significant impact related to the accidental release of hazardous materials, similar to the proposed project.

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

The project site is not located within 0.25-mile of an existing or proposed school. Therefore, Alternative 3 would have no impact associated with emissions of hazardous materials, substances, or wastes within 0.25 mile of a school, which is the same as the proposed project.

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

There are no hazardous materials sites mapped within the project site. As such, Alternative 3 would not create a significant hazard to the public or the environment due to hazardous materials sites. No impact would occur, which is the same as the proposed project.

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

The Santa Barbara Municipal Airport is located approximately 0.25 mile west of the project site. The northern portion of the project site is located within the Clear Zone of the Santa Barbara Airport and the entire project site is within the Airport Influence area of the Santa Barbara Municipal Airport. In addition, the project site falls within the 20,000-foot FAR Part 77 Notification Area for the Santa Barbara Municipal Airport.

Alternative 3 would comply with the same regulations as the proposed project, including the 1993 Santa Barbara County ALUP development standard of a maximum intensity of 25 people per acre and the height restrictions of FAR Part 77. According to the 1993 Santa Barbara County ALUP, the project site is located within Airport Safety Zone II within the Airport Influence Area. The northern portion of the project site is located within Safety Area 1 (Clear Zone) and the southern half of the project site is located within Safety Area 3 (General Traffic Pattern Zone). The more restrictive development standards of Safety Area 1 apply to Alternative 3. Therefore, the ALUP development standard of a maximum intensity of 25 people per acre, as a site-wide average, would apply to Alternative 3. Alternative 3's outdoor storage facility would employ 5 people daily, and would occupy approximately 1.62 acres of the total 11.77-acre project site, which represents an intensity of 0.42 people per acre. Therefore, development under Alternative 3 would comply with the standard specified in the 1993

Santa Barbara County ALUP, and impacts would be slightly reduced compared to the proposed project. The project site is located in the 60-65 dB CNEL noise contour for Santa Barbara Airport. Industrial land uses are identified as compatible within this contour in the 1993 Santa Barbara County ALUP. Therefore, Alternative 3 would not conflict with the 1993 Santa Barbara County ALUP, similar to the proposed project

The 1993 Santa Barbara County ALUP does not specify a maximum height for structures in Safety Area 1, and states that objects should be limited in height consistent with airspace protection surfaces defined by FAR Part 77. Alternative 3's outdoor storage facility and office would have a maximum height of approximately 15 feet from finished grade, which represents a 25-foot reduction in building height compared to the proposed project. Alternative 3 would therefore be consistent with the City's development standards and zoning code that existed prior to 2020, which considered proximity to the Santa Barbara Municipal Airport.

Similar to the proposed project, Alternative 3 would not require Airport Land Use Commission review as the previous zoning ordinance and General Plan were found consistent with the 1993 Santa Barbara County. Alternative 3 would comply with additional applicable FAR Part 77 and FAA standards, which requires projects that may affect navigable airspace to submit a Notice of Proposed Construction or Alteration to FAA for review and approval. If a proposed development is identified as a presumed hazard, the FAA may require further aeronautical study or allow Alternative 3 to be revised. The applicant would be required to file a Notice of Proposed Construction or Alteration with the FAA regional office at least 30 days prior to construction. Based on Alternative 3's design, the FAA would then determine whether Alternative 3 poses a hazard to air navigation and could request changes to project design to minimize those hazards. The FAA would evaluate Alternative 3 against FAR Part 77 Section 77.17, which provides height standards to ensure Alternative 3 would not obstruct navigable airspace. Additionally, the FAA would provide lighting recommendations under FAR Part 77 Section 77.21 (d) [4]. Due to the reduction in height compared to the proposed project, Alternative 3 would have less potential to result in hazards related to proximity to an airport. Compliance with these existing regulations would ensure Alternative 3's impacts related to airport hazards would be less than significant, similar to the proposed project.

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

The City's General Plan does not identify roadways adjacent to the project site as major evacuation routes. Construction of Alternative 3 would not impair implementation of an adopted emergency response plan or emergency evacuation plan, as construction staging and construction worker parking would occur on-site and would not impede existing roadway traffic. Operation of Alternative 3 would consist of an outdoor storage facility and would not introduce activities that could impede or interfere with emergency plans or emergency evacuations. Similar to the proposed project, Alternative 3 would have a less than significant impact related to conflicts with an adopted emergency response plan or emergency evacuation plan.

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

The project site is not within a SRA, or lands classified as VHFHSZ. Alternative 3 would be constructed in accordance with the same requirements as the proposed project, including the California Fire Code and SBCFD standards. As with the proposed project, adherence to these regulations would ensure Alternative 3 would have a less than significant impact related to wildland fire.

i. Hydrology and Water Quality

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

Construction

Alternative 3 would result in similar demolition activities as the proposed project which could generate stormwater pollutants. Alternative 3's potential to introduce stormwater pollutants would be minimized with adherence to SWRCB's Construction Stormwater General Permit which requires implementation of a SWPPP and construction BMPs to minimize pollutant discharge during demolition and construction. In addition to NPDES permit requirements, Alternative 3's construction activities would be subject to the requirements of Chapter 15.09 of the City's Municipal Code which requires preparation and implementation of an erosion and sediment control plan. Nonetheless, due to the highly erodible on-site soils, mitigation would be required to reduce erosion. Similar to the proposed project, Alternative 3 would require implementation of Mitigation Measure GEO-1 which would require implementation of construction measures to minimize erosion. Implementation of Mitigation Measure GEO-1 would reduce Alternative 3's impact on water quality due to erosion to a less than significant level, similar to the proposed project.

Construction of Alternative 3's drainage outfall also would have a similar potential as the proposed project to reduce water quality in San Jose Creek due to if installation of the cofferdam would occur during the wet season. Alternative 3's construction impacts on the water quality of San Jose Creek would be potentially significant. However, required implementation of Mitigation Measure BIO-3 would require the cofferdam to be installed during the dry season and implementation of a Toxic Materials Control and Spill Response Plan which would reduce Alternative 3's water quality impacts on San Jose Creek to a less than significant level, similar to the proposed project.

Similar to the proposed project, Alternative 3 could require groundwater dewatering activities during grading activities. Alternative 3 would be required to obtain coverage under the Limited Threat Discharge Permit if drained groundwater would be discharged into San Jose Creek. Adherence to the permit would reduce potential water quality impacts associated with dewatered groundwater. Similar to the proposed project, if dewatered groundwater is contaminated, the construction contractor for Alternative 3 could not obtain coverage from the Limited Threat Discharge Permit, and impacts would be potentially significant. Alternative 3 would require implementation of Mitigation Measure HAZ-3 which would require groundwater investigation and disposal in accordance with the requirements of the Central Coast RWQCB or City. Implementation of Mitigation Measure HAZ-3 would reduce Alternative 3's potential impact on water quality due to groundwater dewatering to a less than significant level, similar to the proposed project.

Operation

Alternative 3 could introduce potential water pollutants through oil leaks, leaching of metals from roof and drains, and use of pesticides or fertilizers for landscape maintenance. Alternative 3 would not be subject to the NPDES Phase I industrial stormwater regulations because Alternative 3 would not include facilities that are included on the Standard Industrial Classification Codes specified in the permit. Similar to the proposed project, Alternative 3 would be required to comply with Chapter 13.04 of the City's Municipal Code and the Phase II MS4 Permit, which require the use of Source Control and LID BMPs to detain, retain, and treat runoff and implementation of operational BMPs to capture, treat, and reduce pollutants of concern in stormwater runoff. Alternative 3 would provide a detention

basin, hydrodynamic separator, swales, and catch basin inlet filters for stormwater runoff treatment. Alternative 3's detention basin would provide the same amount of stormwater treatment as the proposed project, in accordance with the requirements of the Central Coast RWQCB. Regardless, due to the presence of erodible soils on-site, operation of Alternative 3 could result in potentially significant water quality impacts due to erosion. As with the proposed project, Alternative 3 would require implementation of Mitigation Measure GEO-1 which would require implementation of operational erosion controls such as periodic observations for indications of soil instability, and landscaping management to improve soil stabilization during operation. With implementation of Mitigation Measure GEO-1, Alternative 3's operational water quality impacts would be reduced to a less than significant level, similar to the proposed project.

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

Alternative 3 has a similar potential to encounter groundwater during construction as the proposed project due to the shallow groundwater level on-site. If groundwater dewatering is required, Alternative 3 would result in a similar local decrease of groundwater supplies as the proposed project, which would be minimal, and would not otherwise result in substantial groundwater losses in the Basin or result in changes which prohibit groundwater infiltration on-site compared to existing conditions. Therefore, construction of Alternative 3 would have a less than significant impact on groundwater, similar to the proposed project.

Alternative 3 would decrease the existing 188,963 square feet of impervious surfaces on-site to 184,543 square feet, the same as the proposed project. The project site contains low permeability soils and high groundwater elevation, thereby rendering groundwater infiltration infeasible. Accordingly, Alternative 3 would not result in substantial interference to groundwater recharge, similar to the proposed project.

Operation of Alternative 3 would not require groundwater extraction on-site. As described further in the *Utilities and Service Systems* discussion of this alternative, Alternative 3's water demand would be approximately 19.72 AFY less than the proposed project. Groundwater provided to Alternative 3 from the GWD would be provided in accordance with the allocations determined by the Wright Judgement which would ensure the groundwater provided to Alternative 3 is sustainably managed. Furthermore, existing regulatory measures requiring water conservation during times of drought prevent the overdraft of the Basin that GWD would use to supply water demand of Alternative 3. Therefore, Alternative 3 would not substantially increase water supplies and this impact would be less than significant, and less than the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site?

Construction

Alternative 3's construction activities would disturb the same area as the proposed project and therefore have the same potential for erosion and sedimentation. Similar to the proposed project, Alternative 3 would adhere to the requirements of the Construction Stormwater General Permit, the Limited Threat Discharge Permit, the City Municipal Code, as well as implementation of the required

SWPPP and construction BMPs would minimize pollutant discharge in stormwater runoff. However, due to the erodibility of the project site, Alternative 3's impacts would be potentially significant and require mitigation. Alternative 3 would implement Mitigation Measure GEO-1 which, similar to the proposed project, would incorporate erosion control measures and reduce Alternative 3's construction impacts related to erosion to a less than significant level.

Operation

Similar to the proposed project, Alternative 3 would be required to use Source Control and LID BMPs to detain, retain, and treat runoff and implementation of operational BMPs to capture, treat, and reduce pollutants of concern in stormwater runoff. Alternative 3's detention basin would provide the same amount of stormwater treatment as the proposed project, in accordance with the requirements of the Central Coast RWQCB. Regardless, due to the presence of erodible soils on-site, operation of Alternative 3 could result in potentially significant water quality impacts due to erosion. As with the proposed project, Alternative 3 would require implementation of Mitigation Measure GEO-1 which would require implementation of operational erosion controls such as periodic observations for indications of soil instability, and landscaping management to improve soil stabilization during operation. With implementation of Mitigation Measure GEO-1, Alternative 3's operational impacts related to erosion would be reduced to a less-than-significant level, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Construction

Similar to the proposed project, Alternative 3 would comply with the requirements of the Construction Stormwater General Permit, including requiring the construction contractor to implement a SWPPP. The SWPPP would include construction BMPs to control and direct on-site surface runoff. Construction would not include activities which could result in the channelization of San Jose Creek or relocation of a natural drainage bed which could increase the rate of surface water runoff. Therefore, Alternative 3's construction activities would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. This impact would be less than significant, similar to the proposed project.

Operation

Alternative 3 would be required to use Source Control and LID BMPs to detain, retain, and treat runoff. Alternative 3's detention basin would provide the same amount of stormwater drainage control as the proposed project, in accordance with the requirements of the Central Coast RWQCB. These requirements mandate Alternative 3's stormwater infrastructure be designed to treat the to provide treatment up to two times the 85th percentile storm event. Adherence to the regulatory requirements of the Central Coast RWQCB would ensure Alternative 3 would have a less than significant impact to on- or off-site flooding, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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?

Construction

Alternative 3 would comply with the same regulations as the proposed project intended to control stormwater runoff and reduce pollutants and ensure construction activities would not result in substantial runoff which would exceed the capacity of San Jose Creek. These include requiring the construction contractor to implement a SWPPP and construction BMPs that would direct and manage stormwater to minimize impacts to the capacity of San Jose Creek. However, even with adherence to regulatory requirements, construction activities could result in additional sources of polluted runoff due to construction within San Jose Creek and/or groundwater dewatering activities. Alternative 3 would require implementation of Mitigation Measure GEO-1,BIO-3, and HAZ-3, which would reduce Alternative 3's potential impacts associated with substantial runoff and polluted runoff to a less than significant level, similar to the proposed project.

Operation

Alternative 3 would be required to implement stormwater infrastructure in accordance with Central Coast RWQCB requirements which would provide for substantial stormwater and runoff control on-site. Alternative 3 would also adhere to the Central Coast RWQCB and City LID requirements for treatment of stormwater which would minimize polluted runoff generated during operation of Alternative 3. However, as with the proposed project, highly erodible on-site soils could lead to Alternative 3's operation introducing polluted runoff. Alternative 3 would require implementation of Mitigation Measure GEO-1 which would mandate procedures during operation to minimize on-site soil erosion. With implementation of Mitigation Measure GEO-1, Alternative 3's impact associated with substantial runoff and polluted runoff would be reduced to a less than significant level, similar to the proposed project.

Threshold: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Flooding

Alternative 3 would be located on the same project site as the proposed project and therefore is subject to similar flood hazards. Although the project site is mapped as being located within a 100-year floodplain, the project site is not currently inundated by 100-year flood flows in the existing condition. Off-site rain and stormwater does not enter the project site due to the presence of an existing earthen berm around the project site. The berm prevents 100-year flood flows from entering the project site.

Although the project site in its current condition would not be inundated by 100-year flood flows, Alternative 3 would require additional flood-proofing design measures are required because the berm is not an accredited levee recognized by FEMA. Alternative 3 would require implementation of flood-proofing design measures in accordance with the City Municipal Code. These include the use of between 4 to 6 feet of fill to elevate the proposed building and outdoor storage area above the 100-

year floodplain elevation. Alternative 3 would also be required to be certified by a registered professional engineer or architect that the City's floodplain development standards. In the event of a 100-year flood event, stormwater flows on the project site would be conveyed to Alternative 3's detention basin for eventual discharge to the San Jose Creek. Because Alternative 3 would direct stormwater flows to San Jose Creek, the introduction of fill material for Alternative 3 would not substantially alter off-site flooding or drainage. Due to the earthen berm, flood water from the project site does not discharge to surrounding parcels. Similar to the proposed project, Alternative 3 would not change the flood carrying capacity of the project site, permanently alter a water course, or raise flood elevations. Due to the existing flood protection offered by the earthen berm, project design, and compliance with City requirements governing development within a floodplain, Alternative 3 would have a less than significant impact related to flooding, similar to the proposed project.

Sea Level Rise

As a result of the Supreme Court decision regarding the assessment of the environment's impacts on projects (*California Building Industry Association [CBIA*] v. *Bay Area Air Quality Management District [BAAQMD]*, 62 Cal. 4th 369 [No. S 213478] issued December 17, 2015), it is not considered the purview of the CEQA process to evaluate the impact of existing environmental conditions on a proposed project. For informational purposes only, sea level rise is discussed below.

Alternative 3 would occur on the same project site as the proposed project and would therefore be subject to similar risks of sea level rise. Alternative 3 would require approximately 4 to 6 feet of fill to raise the office building and outdoor storage area above the floodplain. Based on a scenario with 100-year storm event with 6.6 feet of sea level rise, Alternative 3's outdoor storage facility and office would not be inundated because these facilities would be elevated above San Jose Creek's anticipated water surface elevation of 14.78 feet. However, in the northeastern most portion of the project site, the access road to the office building, San Jose Creek maintenance road, and the creek's bank would below the water level elevation during a 100-year storm event. Therefore, should the worst-case 100-year water level elevation of 14.78 feet occur within San Jose Creek, the northern portion of the access road to the outdoor storage facility would be inundated, potentially preventing access to the outdoor storage facility and office. The City would incorporate recommendations made in the *Sea Level Rise and Coastal Hazards Analysis* prepared for the proposed project into Alternative 3 as conditions of approval. The recommendations would require the applicant to monitor future sea level rise and flood levels within San Jose Creek, and construct on-site flood control measures as determined appropriate by the City and other Responsible Agencies including but not limited to elevating the access road to the outdoor storage facility above the 100-year floodplain elevation and continuing to provide maintenance access to San Jose Creek (e.g., constructing a levee, etc.). As part of the condition of approval, the potential effects of sea level rise on Alternative 3 would be evaluated 50 years after the start of construction in conjunction with the Santa Barbara County Flood Control District. With these conditions of approval, the potential for sea level rise to result in an impediment or redirection of flood flows at the project site would be minimized, similar to the proposed project.

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

The project site is located outside of a tsunami hazard zone and is not proximate to a large body of water and therefore is not subject to seiche. Therefore, as with the proposed project, Alternative 3 would not risk release of pollutants in a tsunami hazard zone or seiche hazard zone.

Alternative 3 would be subject to similar flood hazards as the proposed project. Alternative 3 would be designed and constructed in accordance with the floodproofing requirements of the City's Municipal Code which would elevate Alternative 3 two feet above the 100-year flood elevation. Accordingly, in the event the earthen berm fails, pollutants would not be released because Alternative 3's outdoor storage facility would be elevated above the 100-year flood elevation. Furthermore, implementation of Mitigation Measure GEO-1 would require Alternative 3's design to include specific measures to minimize the release of stormwater pollutants. Due to regulatory requirements and required implementation of Mitigation Measure GEO-1, Alternative 3 would not risk release of pollutants due to flood hazards, similar to the proposed project.

The project site is within the inundation zone of the Rancho Del Ciervo dam. Alternative 3 and the proposed project would not include any features which would preclude routine dam inspection or otherwise increase the risk for dam failure and inundation. Therefore, Alternative 3's potential impacts related to pollutant release due to dam inundation would be less than significant, similar to the proposed project.

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

The Basin Plan, adopted by the Central Coast RWQCB, is the water quality control plan applicable to the project site. Alternative 3 would comply with applicable regulatory requirements related to stormwater runoff to minimize the potential for pollutants to degrade water quality. These include the Construction Stormwater General Permit, the Limited Threat Discharge Permit, the Central Coast RWQCB's Post-Construction Requirements, the County's Stormwater Technical Guide for Low Impact Development, and Chapter 13.04 and Chapter 15.09 of the City's Municipal Code. However, Alternative 3, has a similar potential as the proposed project to result in water quality impacts related to erosion, construction in San Jose Creek, and groundwater dewatering, which could conflict with the goal of the Basin Plan. Alternative 3 would require implementation of Mitigation Measures GEO-1, HAZ-3, and BIO-3 to reduce potential surface water quality impacts related to erosion, groundwater dewatering, and construction within San Jose Creek. With implementation of these measures, Alternative 3's impact related to conflicts with the Basin Plan would be reduced to a less-than-significant level, similar to the proposed project.

GWD's Groundwater Management Plan Goleta Groundwater Basin (2022) serves as the guiding document for GWD to manage groundwater in accordance with the Wright Judgement. As described above, Alternative 3 would not adversely impact groundwater supplies or the management of the Goleta Groundwater Basin in accordance with the Wright Judgement. Existing regulatory measures requiring water conservation during times of drought prevent the overdraft of groundwater that GWD would use to supply the demand induced by Alternative 3. Accordingly, Alternative 3 would have a less than significant impact related to conflicts with a sustainable groundwater management plan, similar to the proposed project.

j. Land Use and Planning

Threshold: Would the project physically divide an established community?

The project site is primarily surrounded by industrial and open space land uses. The nearest residential development to the project site is located to the east, across State Route 217. The project site is neither directly adjacent to residences nor located in a residential neighborhood. Alternative 3 would not include components such as roads that could divide an established community. As with the

proposed project, Alternative 3 would not result in the physical division of an established community, and no impact would occur.

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

Alternative 3 includes development of an outdoor storage facility and office building that would be consistent with the permitted uses in the City's M-1 zone. Alternative 3 would be consistent with the setback, coverage, height, and landscaping requirements within the M-S-GOL and M-1 zones as Alternative 3's proposed office building would be located more than 50 feet from the centerline and 20 feet from the right-of-way of South Kellogg Avenue and setback more than 10 feet from the property line; would not occupy more than 50 percent of the net area of the project site with buildings; would not exceed the height limits of the M-S-GOL and M-1 zones; and would not decrease landscaping compared to the proposed project.

As with the proposed project, Alternative 3 would be subject to the requirements of the previous zoning code (Article II, Coastal Zoning Code). Section 35-97.2 of the previous zoning code states that if the project site is determined to be outside of this district, then the regulations of the overlay district shall not apply. A small portion of San Jose Creek to the southeast of the project site is located within the ESHA Overlay District. Alternative 3 would include utility development within 50 feet of this area. Section 35-97.19 of the previous zoning code states that no structures shall be allowed within stream corridors when located in the ESHA Overlay District. Because the utility trench would be subsurface and not considered structural development, Alternative 3's utility trench would be consistent with the previous zoning code.

Alternative 3's detention basin outfall would be located within the boundary of the Goleta Slough SMCA, similar to the proposed project. Authorization for any activities in the Goleta Slough SMCA would be provided by California Department of Fish and Wildlife as part of the Lake and Streambed Alteration Agreement notification process. Therefore, Alternative 3 would not conflict with land use policies within the Goleta Slough SMCA, similar to the proposed project.

The project site is located within the Airport Influence Area of Santa Barbara Airport. Alternative 3 would comply with the ALUP development standard of a maximum intensity of 25 people per acre, as Alternative 3 would employ 5 people daily which would represent an intensity of up to 0.42 people per acre on the 11.77-acre project site. The project site is located in the 60-65 dB CNEL noise contour for the Santa Barbara Airport; however, industrial land uses are classified as compatible in this contour in the 1993 Santa Barbara County ALUP. Similar to the proposed project, Alternative 3 would not conflict with the safety and noise policies of the 1993 Santa Barbara County ALUP.

Mitigation Measures BIO-1 through BIO-4 in Section 4.3, *Biological Resources*, and Mitigation Measure NOI-1 in Section 4.11, *Noise*, would reduce Alternative 3's impacts involving conflicts with land use plans, policies, or regulations that were adopted for purposes of reducing environmental impacts to the extent feasible. Mitigation Measures BIO-1 through BIO-4 would reduce potential impacts to special-status species, and Mitigation Measure NOI-1 would reduce project construction noise. These mitigation measures would reduce impacts involving conflict with the Goleta General Plan as they would minimize potential impacts to protected environmental resources within the Goleta General Plan. However, Alternative 3, similar to the proposed project, would include a request to reduce the 100-foot SPA buffer at San Jose Creek to 25 feet along the entire project site boundary adjacent to San Jose Creek. This reduction in the SPA buffer would be potentially inconsistent with following Goleta General Plan policies:

- Policy CE 1.6: Protection of ESHAs
- Policy CE 2.2: Streamside Protection Areas
- Policy CE 2.6 Restoration of Degraded Creeks

With regards to Policy CE 1.6, Alternative 3 would place fill within the SPA buffer. Because alternative site configurations for Alternative 3 that reduce development within the SPA are feasible (See Alternative 2), Alternative 3 would be inconsistent with this policy. With regards to Policy CE 2.2 and CE 2.6, construction and operational impacts on the biotic quality of the SPA from a buffer reduction to 25 feet would be significant and unavoidable. Additionally, development in the SPA buffer would eliminate the potential for future preservation in a natural state. Accordingly, due to the proposed SPA buffer reduction, Alternative 3 would result in a significant and unavoidable impact from conflicts with Policies CE 1.6, CE 2.2, and CE 2.6 of the Goleta General Plan, similar to the proposed project.

Unlike the proposed project, Alternative 3's the overall height of storage bays and office building would be a maximum of 13 feet above existing grade and 15 feet above existing grade, respectively. As discussed in the *Aesthetics* discussion of this alternative, Alternative 3 would reduce the maximum building height of the proposed project by 25 feet which would ensure the Alternative 3 facilities would not interfere with views of the Santa Ynez Mountains or foothills from SR 217. Several Goleta General Plan policies are intended to protect scenic views and ensure development is consistent in size, bulk, scale, and height with surrounding development. These polices include LU 1.8, VH 1.1, VH 2.2, and VH 2.3. While the proposed project would conflict with these policies due to the height of the industrial building, Alternative 3's facilities would be consistent with surrounding development and would not result in substantial interference with views of the Santa Ynez Mountains or foothills from SR 217; therefore, Alternative 3 would not conflict with the Policies LU 1.8, VH 1.1, VH 2.2, or VH 2.3. Alternative 3 would reduce the proposed project's significant and unavoidable impact related to conflicts with Goleta General Plan Policies LU 1.8, VH 1.1, VH 2.2, or VH 2.3 to a less than significant level.

k. Noise

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

Construction

Construction activities under Alternative 3 would be the same as the proposed project, and would include demolition, grading, and building construction that would temporarily increase noise levels at noise-sensitive receptors in the project site vicinity. As the overall footprint for Alternative 3 would be the same as the proposed project, the distances from construction to the nearest sensitive receptors would be the same. Estimated construction noise levels from Alternative 3 are provided in Table 6-14, using the same construction equipment assumed for the proposed project. As shown in the table, construction noise levels may exceed Goleta's 65 dBA standard at the Rancho Goleta mobile home community to the east but would not exceed the standard at the residence to the west. Therefore, construction noise impacts from Alternative 3 would be the same as the proposed project, which would be mitigated to less than significant through Mitigation Measure NOI-1.

Table 6-14 Construction Noise Levels – Alternative 3

Receptor	Land Use Type	Direction from Project Site	Distance from Construction (feet)	Noise Level (dBA Leq)[1]		Exceed Threshold?[2]
				General Construction	Joint Utility Trench Construction	
1150 S Fairview Ave	Single-family	West	425	65	64	No
Rancho Goleta Community	Mobile Home	East	325	66	67	**Yes**

[1] The loudest construction scenario analyzed for both activities was assumed to be a grader, excavator, and loader.

[2] The City of Goleta threshold is if construction noise exceeds 65 dBA.

Operation

Stationary Noise

Alternative 3 would not involve loading dock activities such as the proposed project. Therefore, the main source of operational noise would be from mechanical equipment for the office building. Given the relatively small size of the 500-square foot office building, it was assumed that one HVAC unit would be necessary. It was conservatively assumed that the office building would be located at the closest feasible distance to each sensitive receptor; therefore, HVAC noise was analyzed at 275 feet to 1150 S Fairview Avenue and 400 feet from the Rancho Goleta mobile home community. Noise from one HVAC unit from Alternative 3 would be 38 dBA at 1150 S Fairview Avenue and 35 dBA at the Rancho Goleta mobile home community. These noise levels are lower than the proposed project's estimated noise levels by 3 dBA and 7 dBA, respectively. Therefore, operation noise from Alternative 3 would be less than significant, and less than the proposed project.

Off-site Traffic Noise

CONSTRUCTION

Construction worker trips with Alternative 3 would be similar to the proposed project. Haul trips would also be similar at 1,100 trips each. Therefore, the less than significant construction traffic noise impacts determined for the proposed project would also apply to Alternative 3.

OPERATION

Operation of Alternative 3 would generate a smaller number of operational trips compared to the proposed project, as the employee count would be reduced from approximately 75 employees to 5 employees, and as the daily operational truck trips would be reduced from approximately 28 to 16. Traffic noise increases under Alternative 3 would be less than the 0.2 dBA noise increase estimated for the proposed project. Therefore, operation traffic noise from Alternative 3 would be less than significant, and less than the proposed project.

Threshold: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be used to construct Alternative 3. Similar to the proposed project, the greatest anticipated source of vibration during general project construction activities would be from a dozer, which would be used as close as 50 feet during construction from the nearest buildings to the northeast. A dozer

would create a vibration level of approximately 0.089 PPV in/sec. at a distance of 25 feet, similar to the proposed project. This would equal a vibration level of approximately 0.042 PPV in/sec. at a distance of 50 feet. This vibration level would be well below the Caltrans vibration damage potential threshold for older structures of 0.3 PPV in/sec for continuous/frequent intermittent sources. Therefore, temporary vibration impacts from Alternative 3 associated with the dozer (and other potential equipment) would be less than significant, similar to the proposed project.

Operational activities known to generate excessive ground-borne vibration include projects involving railroads and subways. Alternative 3 would not involve substantial vibration sources associated with operation such as this. Therefore, Alternative 3's operational groundborne vibration and noise impacts would be less than significant, similar to the proposed project.

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

The project site is located within the 60 to 65 CNEL noise contour from Santa Barbara Airport, which is approximately 1,100 feet to the west. This would be a noise exposure within the City's "normally acceptable" recommendation for noise levels for industrial uses, which is up to 70 CNEL. Therefore, construction workers building Alternative 3 or workers of the outdoor storage facility would not be exposed to excessive airport noise levels, and impacts would be less than significant, similar to the proposed project.

I. Public Services

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

Alternative 3 would require 5 employees as opposed to the 75 employees anticipated for the proposed project. In a conservative scenario wherein all projected employees and their families were to relocate to Goleta, there would be a population growth of approximately 13 residents based on the city's average persons per household of 2.64. The addition of 13 residents to the City would maintain the existing SBCFD ratio of approximately 2.77 firefighters per 2,000 persons and would result in marginally less change to the SBCFD ratio in comparison to the proposed project. The project site is located approximately 1.3 miles from the County Station 12 and thus firefighters would be able to readily respond to the demand for fire services at the project site. Alternative 3 would be constructed in accordance with the same regulations as the proposed project, including the California Fire Code and SBCFD regulations, which would minimize the potential for fire protection services to be needed at the project site. As with the proposed project, the project applicant would be required to pay development impact fees which would provide funding for expanded fire protection facilities, including environmental compliance and permitting for new facilities. Alternative 3 would reduce demand for fire protection facilities in comparison to the proposed project, and Alternative 3's impact to fire protection facilities would be less than significant.

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

Alternative 3 would result in a maximum population growth of 13 residents, which is 185 less residents than the proposed project. Accordingly, Alternative 3 would result in a marginally reduced demand for police services compared to the proposed project. Similar to the proposed project, the population growth that could occur with Alternative 3 represents less than one percent of Goleta's existing population which is not anticipated to substantially alter the existing service ratios provided by the contracted Deputy Service Units such that an additional officer would be required in order to provide adequate public services. Thus Alternative 3, similar to the proposed project, would not be expected to result in substantial additional police services or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts. The project applicant would be required to pay development impact fees to provide revenue to assist with funding future capital facilities for police services or increased law enforcement personnel. Alternative 3 would reduce demand for police protection facilities in comparison to the proposed project, and Alternative 3 would have a less than significant impact on police facilities.

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

Alternative 3 would result in a maximum population growth of 13 residents, which is 185 fewer residents than the proposed project. This growth would require approximately 13 residential units based on the City's average persons per household of 2.64 Using a student generation factor of 0.2 students per residential unit per school district, consistent with the City's General Plan Final EIR, Alternative 3 could generate approximately three students in GUSD and five students in SBUSD from indirect population growth, which is ten less students in each district compared to the proposed project. Because Alternative 3 would generate less students than the proposed project and the proposed project would not exceed the existing capacities of school facilities, Alternative 3 would also not induce indirect population growth such that the existing capacities of school facilities would be exceeded. Similar to the proposed project, the applicant would pay state-mandated developer fees to fund the construction of school facilities to accommodate students generated from new development projects. Pursuant to Senate Bill 50, payment of this fee "…is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Alternative 3 would reduce demand for school facilities and with payment of school fees, Alternative 3 would have a less than significant impact on schools.

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

Alternative 3 could indirectly result in a population growth of 13 residents, which is 185 fewer residents than the proposed project which would place less demand on library services than the

proposed project. The small population increase that could occur would not inhibit the ability for the Goleta Valley Library to maintain material circulation. The existing library facility would be sufficient to accommodate the potential incrementally increased use and circulation needs that may result from indirect population growth due to Alternative 3. Furthermore, the applicant would pay development impact fees which would fund the provision of new or expanded libraries. Alternative 3 would reduce demand for library facilities compared to the proposed project and Alternative 3 would have a less than significant impact on the need for new or physically altered libraries.

m. Transportation and Circulation

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

Similar to the proposed project, Alternative 3 would not introduce features that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As described in the *Land Use and Planning*, discussion of this alternative, Alternative 3 would be consistent with the City's Transportation Element policies. Alternative 3 would not cause changes to the existing bicycle facilities on Hollister Avenue, Fairview Avenue, or Ward Drive. There is an existing sidewalk located on South Kellogg Avenue, and Class III bicycle lanes located on South Kellogg Avenue. Project site access would be provided via an existing driveway which connects to an access road. Alternative 3 would resurface the existing access road. Alternative 3 would also include installation of a sidewalk which would start at South Kellogg Avenue and extend to the proposed parking lot. Alternative 3's design features would be subject to review and approval by the City, which would ensure Alternative 3 would conform to the City's driveway access control and vision clearance standards and minimize potential vehicle to pedestrian and vehicle to cyclist conflicts in accordance with City standards. Alternative 3, would not generate a substantial increase in transit use due to the increase in up to 5 employees as employees are anticipated to be residents of Goleta who area within the service area of the Santa Barbara Metropolitan Transit District.

Given the above considerations, Alternative 3 would have a less than significant impact on a program, plan, ordinance or policy that addresses the current circulation system including transit, roadway, bicycle, and pedestrian facilities, similar to the proposed project.

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

Construction of Alternative 3 would result in similar, short-term, temporary vehicle trips as the proposed project, which would not result in long term changes to VMT within Goleta. Therefore, Alternative 3's construction VMT would not be inconsistent with CEQA Guidelines Section 15064.3(b), similar to the proposed project. The project site is within an area identified by the City where work-based projects would generate an average VMT of 15 percent or more below baseline levels, would not require a VMT analysis, and would be presumed to have a less than significant impact on VMT. Therefore, similar to the proposed project, Alternative 3 would have a less than significant impact on VMT and would not conflict with CEQA Guidelines Section 15064.3(b).

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

Construction staging for Alternative 3 would be located at the project site which would minimize the potential for construction related vehicles and equipment to create a circulation related hazard in the immediate area. Alternative 3 would store construction materials which could reasonably be transported to construction sites with the use of a WB-62 delivery truck. As with the proposed project, Alternative 3 would be required to widen the eastern portion of the driveway in order to accommodate WB-62 delivery truck turning requirements. WB-62 delivery trucks would be expected to access the project site via South Kellogg Avenue, Hollister Avenue, and SR 217, all of which can accommodate a WB-62 delivery truck. The transportation design of Alternative 3 would also be required to be reviewed by SBCFD and the City to ensure Alternative 3 would not introduce geometric design hazards. Alternative 3 would not introduce new incompatible uses, such as farm equipment, to roadways. Therefore, Alternative 3 would have a less than significant impact on transportation hazards, similar to the proposed project.

Threshold: Would the project result in inadequate emergency access?

Construction staging for Alternative 3 would occur on-site, similar to the proposed project, which would minimize the potential for construction-related vehicles and equipment to result in inadequate emergency access in the immediate area. Alternative 3 and the proposed project would be required to be designed in accordance with applicable SBCFD standards, including those that address minimum driveway width, signage and addressing, fire hydrants, fire sprinklers, and emergency access. Alternative 3 would also be required to widen the driveway which would also improve access for emergency vehicles. With compliance with SBCFD and City standards, Alternative 3's impacts to inadequate emergency access would be less than significant, similar to the proposed project.

n. Tribal Cultural Resources

Threshold: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Alternative 3 would be located on the same project site as the proposed project, and therefore would have a similar potential to impact tribal cultural resources. Based on Native American consultation conducted for the proposed project, no tribal cultural resources have been identified on the project site. The Archaeological Resources Assessment completed for the project site determined there is a very low potential for subsurface resources to exist within the project site. Therefore, similar to the proposed project, Alternative 3 would not cause a substantial adverse change to tribal cultural resources, and impacts would be less than significant.

o. Utilities and Service Systems

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

Water

As with the proposed project, Alternative 3 would require water utility infrastructure to connect to the existing GWD pipeline underneath the sidewalk adjacent to South Kellog Avenue in order to supply water to the project site. Alternative 3 would generate a reduced water demand compared to the proposed project due to a reduction in employment and therefore would not generate substantial water demand and would not necessitate new or expanded facilities in order to meet Alternative 3's water demand. Therefore, Alternative 3's impact on water infrastructure would be less than significant, similar to the proposed project.

Wastewater

Alternative 3 would require similar sewer infrastructure as the proposed project in order to connect to the sewer line located underneath South Kellog Avenue. Alternative 3 would generate less wastewater during operation than the proposed project due to a reduction in employment. Therefore, wastewater generated by Alternative 3 would not exceed the existing capacity of the GSD WWTP. Alternative 3 would not require new or expanded wastewater treatment facilities beyond the sewer line connection. Similar to the proposed project, Alternative 3's impact on wastewater infrastructure would be less than significant.

Stormwater

Alternative 3 would require implementation of stormwater facilities sized in accordance with Central Coast RWQCB and City requirements in order to treat and dispose of on-site stormwater. Alternative 3 would discharge stormwater to San Jose Creek, similar to the proposed project, as the underlying groundwater levels make infiltration infeasible. No additional stormwater drainage facilities, such as additional off-site drains of underground pipelines, would be required beyond the infrastructure needed for Alternative 3.

Electric, Natural Gas, and Telecommunications Facilities

As with the proposed project, Alternative 3 would install a transformer pad and utility lines which would connect to existing electric, natural gas, and telecommunications infrastructure proximate to the project site. Alternative 3's demand for electric, natural gas, and telecommunications facilities would be less than the proposed project because Alternative 3 would only include storage and office uses rather than more energy intensive uses such as wholesaling and distribution. SCE and SCG would have sufficient electricity and natural gas supplies for Alternative 3 without the installation of additional electric or natural gas infrastructure. Similarly, Alternative 3 would use existing telecommunications facilities during operation and would not require upgrades to existing facilities or create a demand for service unable to be met by existing providers. Therefore, similar to the proposed project, Alternative 3's impact to electric, natural gas, and telecommunications facilities would be less than significant.

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

Alternative 3 would not include an industrial building. Rather, Alternative 3 would utilize the project site as an outdoor storage facility and would include a 500 square foot office building. The storage of construction materials and RVs would not generate water demand. Therefore, Alternative 3's water demand is based upon the demand that would be generated from the 500 square foot office building. According to the County's 2021 *Environmental Thresholds and Guidelines Manual*, Office land uses are anticipated to have a water demand of 0.15 AFY per 1,000 square feet of development. Therefore, development of Alternative 3's 500 square foot office space would generate a water demand of approximately 0.08 AFY, approximately 19.72 AFY less than the proposed project. The project site has been allocated water for the proposed project based on historical water credits from the prior on-site use. Because Alternative 3 would have a reduced water demand compared to the proposed project, adequate water supply would be available for Alternative 3 and could be served by GWD at the time of development. Alternative 3's anticipated water demand of 0.08 AFY represents less than one percent of GWD's anticipated 2040 surpluses in a normal year, dry year, and multiple dry years. Alternative 3 would comply with the same GWD-imposed water shortage restrictions as the proposed project during drought periods which would reduce its water demand in times of drought. Alternative 3 would not result in substantial water supply reductions. This impact would be less than significant, and less than the proposed project.

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

Anticipated wastewater generation is calculated consistent with the wastewater generation factor of 100 gallons per day per 1,000 square feet of habitable space used in the City's General Plan Final EIR. Alternative 3's 70,594 square foot outdoor storage facility would not include restroom facilities; therefore, Alternative 3's wastewater generation is based upon the 500 square foot office building. Alternative 3's wastewater generation would then be 50 gallons per day which is 7,009 gallons less than the proposed project. This wastewater generation represents less than 0.01 percent of the 1.11 MGD capacity available at the GSD WWTP for GSD customers. Alternative 3 would not generate wastewater in excess of existing capacity. This impact would be less than significant, and less than the proposed project.

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

and

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

Alternative 3 would result in the same demolition activities as the proposed project and would generate the same amount of demolition debris, which is approximately 443 tons of debris. Alternative 3 would result in the same disturbance area as the proposed project and therefore would generate the same amount of construction debris, which would total 486 tons of debris based on the U.S. EPA's solid waste generation factor of 3.89 pounds per square foot for construction. In total, Alternative 3's demolition and construction activities would generate 929 tons of solid waste, the

same as the proposed project. Alternative 3's construction period is estimated to occur over 9 months. Pursuant to Chapter 8.10, Article IV of the Goleta Municipal Code, construction contractors are required to divert 65 percent of all construction and demolition waste by weight from landfill disposal for any new structure. The applicant is required to submit a Waste Management Plan which would indicate how solid waste generated during demolition and construction would be diverted in accordance with City requirements. With compliance with City requirements, the proposed project's demolition and construction activities would generate an estimated 325 tons of non-recyclable waste, the same as the proposed project. This amount of nonrecyclable waste would exceed the City's project-specific threshold of 196 tons per year. Similar to the proposed project, Alternative 3 would require implementation of Mitigation Measure UTIL-1 to implement a Waste Management Plan and further increase waste diversion. Similar to the proposed project, Alternative 3's reduction in waste generation that requires a landfill cannot be fully determined until implementation of Mitigation Measure UTIL-1 is completed. Although construction of Alternative 3 would generate less solid waste than the proposed project, Alternative 3's short-term impacts related to demolition and construction waste would remain significant and unavoidable. In addition, Alternative 3's short-term construction waste would have a cumulatively considerable contribution on cumulative impacts related to solid waste.

Alternative 3's outdoor storage facility would not generate solid waste; therefore, operational solid waste generation is based upon the 500 square foot office building. Pursuant to the methodology of County's 2021 *Environmental Thresholds and Guidelines Manual*, which estimates solid waste generation for an office using a factor of 0.0013 tons multiplied by the square footage of a project, operation of Alternative 3 would generate approximately 0.65-ton of solid waste annually, which is 112.35 tons less than the proposed project. This solid waste would be reduced to 0.33 tons of non-recyclable solid waste per year, consistent with a 50 percent solid waste diversion rate. This amount of solid waste does not exceed the City's project-specific threshold of 196 tons per year. Solid waste impacts during operation would be less significant, and less than the proposed project.

6.4 Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative among the alternatives evaluated in an EIR. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

This discussion identifies the environmentally superior alternative by assessing the degree to which each alternative avoids significant and unavoidable environmental impacts. In some cases, an alternative will avoid one or more significant and/or unavoidable impacts identified for the proposed project but then introduce one or more new significant impacts. Therefore, selection of the environmentally superior alternative requires an overall assessment of the changes in the number and type of significant impacts.

The *CEQA Guidelines* do not define a specific methodology for determining the environmentally superior alternative. For the purposes of this analysis, the project alternatives have been compared within each issue area to the proposed project, and a determination has been made as to whether the potential environmental effects of each alternative would be reduced, increased, or is similar in comparison to the proposed project (refer to Table 6-15). For the purpose of this EIR, each impact is equally weighted. Decision makers and the community in general may choose to emphasize one issue or another, which could lead to differing conclusions regarding environmental superiority.

As shown in Table 6-15, the No Project Alternative would be the environmentally superior alternative because the No Project Alternative would result in no impact to any environmental issue area. However, the No Project Alternative would not fulfill any of the project objectives.

As stated above, *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. The environmentally superior alternative among the other alternatives would be Alternative 3. Neither Alternative 2 nor Alternative 3 create additional environmental impacts in comparison to the proposed project. Alternative 3 would reduce the proposed project's significant and unavoidable aesthetics impacts to a less than significant level. Unlike Alternative 2, Alternative 3 would result in lesser impacts to air quality, energy, greenhouse gas emissions, hydrology and water quality, operational noise, public services, and utilities and service systems, although Alternative 3 would not reduce the proposed project's impact conclusions in these issue areas. However, Alternative 3 would result in similar biological resources impacts as the proposed project, including a significant and unavoidable impact related to conflicts with local ordinances that protect biological resources. In addition, Alternative 3 would fail to meet the following project objectives as Alternative 3 would not provide tenant space or an industrial building:

- To develop a project with long-term viability through design by providing sufficient square footage with flexibility of interior size and arrangement for up to 4 tenant spaces with 6 loading docks.
- To develop a project with sufficient height (up to 35 foot maximum) to accommodate a variety of potential tenant needs that are consistent with the General Plan/Coastal Land Use Plan (General Plan) designation of Service/Industrial and zoning designation of Light Industry (M-1) and Service Industrial-Goleta (M-S-GOL).

In addition, Alternative 3 would only partially meet the following project objectives due to a reduction in employees compared to the proposed project:

- Attract local employment opportunities in the industrial sector and generate new property tax revenue for the City.
- Optimize economically beneficial reuse of a previously developed, disturbed, and underutilized site within the City with existing infrastructure and access on a site that has significant land use limitations, including airport, hydrologic, and flooding constraints, that limit compatible uses on the site.

Alternative 2 would reduce the proposed project's significant and unavoidable impact to biological resources to a less than significant level by complying with the 100-foot SPA buffer. Alternative 2 would result in a greater noise impact compared to the proposed project and would marginally increase greenhouse gas emissions and energy use during construction compared to the proposed project, although impacts would remain less than significant with mitigation. Alternative 2 would result in similar impacts to all other issue areas, including significant and unavoidable impacts related to aesthetics and solid waste disposal. However, unlike Alternative 3, Alternative 2 would fulfill all of the project objectives.

Table 6-15 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Aesthetics				
Scenic vistas	Significant and Unavoidable	No Impact (+)	Significant and Unavoidable (=)	Less Than Significant (+)
Scenic highways	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Scenic quality	Significant and Unavoidable	No Impact (+)	Significant and Unavoidable (=)	Less Than Significant (+)
Light and glare	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Air Quality				
Conflicts with an Air Quality Plan	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Cumulatively considerable increases of criteria pollutants	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Sensitive receptor exposure to pollutant concentrations	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Odors	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Biological Resources				
Effects on candidate, sensitive, or special-status species	Less Than Significant with Incorporation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5 and NOI-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5 and NOI-1 (=)	Less Than Significant with Incorporation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and NOI-1 (=)
Effects on riparian habitat or sensitive natural communities	Less Than Significant with Incorporation of Mitigation Measures BIO-3, BIO-5, BIO-6, and BIO-7	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures BIO-3, BIO-5, BIO-6, and BIO-7 (=)	Less Than Significant with Incorporation of Mitigation Measures BIO-3, BIO-5, BIO-6, and BIO-7 (=)
Effects on state- or federally-protected wetlands	Less Than Significant with Incorporation of Mitigation Measures BIO-5, BIO-6, BIO-7, and BIO-8	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures BIO-5, BIO-6, BIO-7, and BIO-8 (=)	Less Than Significant with Incorporation of Mitigation Measures BIO-5, BIO-6, BIO-7, and BIO-8 (=)
Wildlife movement	Less Than Significant with Incorporation of Mitigation Measures BIO-1, BIO-6, BIO-7, and BIO-9	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure BIO-1, BIO-6, BIO-7, BIO-9, and NOI-1 (=)	Less Than Significant with Incorporation of Mitigation Measures BIO-1, BIO-6, BIO-7, BIO-9, and NOI-1 (=)
Conflicts with local polices protecting biological resources	Significant and Unavoidable	No Impact (+)	Less Than Significant (+)	Significant and Unavoidable (=)
Conflicts with Habitat Conservation Plans	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Cultural Resources				
Effects on historical resources	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Effects on archaeological resources	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Disturbance of human remains	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Energy				
Wasteful, inefficient, or unnecessary consumption of energy resources	Less Than Significant	No Impact (+)	Less Than Significant (-)	Less Than Significant (+)
Conflicts with a state or local plan for renewable energy or energy efficiency	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Geology and Soils				
Alquist-Priolo earthquake fault zones	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Seismic ground shaking	Less Than Significant with Incorporation of Mitigation Measure GEO-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)
Liquefaction and Unstable soils	Less Than Significant with Incorporation of Mitigation Measure GEO-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)
Landslides	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Substantial erosion and loss of topsoil	Less Than Significant with Incorporation of Mitigation Measure GEO-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)
Expansive soils	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Use of septic tanks or alternative wastewater disposal systems	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Destruction of paleontological resources or unique geologic features	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Greenhouse Gas Emissions				
Generation of GHG emissions	Less Than Significant	No Impact (+)	Less Than Significant (-)	Less Than Significant (+)
Conflicts with plans, policies, or regulations adopted to reduce GHG emission	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Hazards and Hazardous Materials				
Transport, use, and disposal of hazardous materials	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Upset and accident conditions involving hazardous material release	Less Than Significant with Incorporation of Mitigation Measures HAZ-1, HAZ-2, HAZ-3, HAZ-4, and HAZ-5	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures HAZ-1, HAZ-2, HAZ-3, HAZ-4, and HAZ-5 (=)	Less Than Significant with Incorporation of Mitigation Measures HAZ-1, HAZ-2, HAZ-3, HAZ-4, and HAZ-5 (=)
Emit hazardous emissions or handle hazardous materials within 0.25-mile of a school	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Hazardous materials sites	No Impact	No Impact (+)	No Impact (=)	No Impact (=)
Airport hazards	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Impairment of or interference with emergency response plans and emergency evacuation plans	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Exposure of people or structures to risk involving wildland fires	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Hydrology and Water Quality				
Violate water quality standards, waste discharge requirements, or degrade surface or groundwater quality	Less Than Significant with Incorporation of Mitigation Measures GEO-1, BIO-3, and HAZ-3	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures GEO-1, BIO-3, and HAZ-3 (=)	Less Than Significant with Incorporation of Mitigation Measures GEO-1, BIO-3, and HAZ-3 (=)
Decrease groundwater supplies or interfere with groundwater recharge	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Result in substantial erosion or siltation	Less Than Significant with Incorporation of Mitigation Measure GEO-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)
Result in on-or off-site flooding	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Exceed the capacity of stormwater drainage systems or provide substantial additional polluted runoff	Less Than Significant with Incorporation of Mitigation Measure GEO-1 and BIO-3	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1, BIO-3, and HAZ-3 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1, BIO-3, and HAZ-3 (=)
Impede or redirect flood flows	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Risk release of pollutants due to project inundation	Less Than Significant with Incorporation of Mitigation Measure GEO-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)	Less Than Significant with Incorporation of Mitigation Measure GEO-1 (=)
Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan	Less Than Significant with Incorporation of Mitigation Measures GEO-1, HAZ-3, and BIO-3	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measures GEO-1, HAZ-3, and BIO-3 (=)	Less Than Significant with Incorporation of Mitigation Measures GEO-1, HAZ-3, and BIO-3 (=)
Land Use				
Physically divide an established community	No Impact	No Impact (=)	No Impact (=)	No Impact (=)
Conflict with land use plans, policies, or regulations adopted to avoid or mitigate an environmental effect	Significant and Unavoidable	No Impact (+)	Significant and Unavoidable (=)	Significant and Unavoidable (=)
Noise				
Result in substantial temporary or permanent ambient noise increases	Less Than Significant with Incorporation of Mitigation Measure NOI-1	No Impact (+)	Less Than Significant with Incorporation of Mitigation Measure NOI-1 (-)	Less Than Significant with Incorporation of Mitigation Measure NOI-1 (+)
Generate excessive gorundborne vibration or groundborne noise levels	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Expose residents or employees to excessive airport noise	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Public Services				
Result in the need for new or physically altered fire protection facilities	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Result in the need for new or physically altered police protection facilities	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Result in the need for new or physically altered school facilities	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Result in the need for new or physically altered other public facilities	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative	Alternative 2: 100-Foot Streamside Protection Area Setback	Alternative 3: Outdoor Storage
Transportation and Circulation				
Conflict with a program, plan, ordinance, or policy addressing the circulation system	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Conflict or be inconsistent with CEQA Guidelines section 15064.3(b)	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Substantially increase hazards due to geometric design features or incompatible equipment	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Result in inadequate emergency access	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Tribal Cultural Resources				
Cause a substantial adverse change in the significance of a tribal cultural resources	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Utilities and Service Systems				
Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (=)
Have sufficient water supplies to serve the project in normal, dry, and multiple dry years	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
Be adequately served by a wastewater treatment provider	Less Than Significant	No Impact (+)	Less Than Significant (=)	Less Than Significant (+)
General solid waste in excess of State or local standards or of the capacity of local infrastructure and Comply with federal, state, and local management and reduction statutes and regulations related to solid waste	Significant and Unavoidable	No Impact (+)	Significant and Unavoidable (=)	Significant and Unavoidable (=)

+ Superior to the proposed project (reduced level of impact)
- Inferior to the proposed project (increased level of impact)
= Similar level of impact to the proposed project

7 References

7.1 Bibliography

Environmental Setting

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7.2 List of Preparers

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