

Shelby Residential Project

Revised Draft Environmental Impact Report

SCH #2012081019

prepared by

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Executive Summary

This document is a Revised Environmental Impact Report (EIR) analyzing the environmental effects of the proposed Shelby Residential Project (hereafter referred to as the "proposed project") in the City of Goleta. The project applicant initially submitted an application to the City of Goleta on October 11, 2005. In 2011, the City determined that the application for the proposed project was completed. On August 7, 2012, the City released a Notice of Preparation of a Draft EIR for the proposed project. The City released two Draft EIRs for public review in 2014. These earlier documents addressed both a required General Plan amendment and project-level impacts. Due to a Stage II Water Shortage Emergency and water moratorium imposed by the Goleta Water District in September 2014, the project was delayed. In 2023, the project applicant submitted a revised application under Senate Bill 330, reducing the number of residential units and incorporating deed-restricted affordable housing. As a General Plan amendment is no longer required, this Revised EIR supersedes all prior EIRs and reflects updates to the project design, California Environmental Quality Act (CEQA) Guidelines, and local thresholds. Additionally, this Revised EIR incorporates new analysis related to vehicle miles traveled, energy demand, tribal cultural resources, and wildfire risk.

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

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Project Description

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

Location and Existing Setting

The proposed project would be developed on a 14.38-acre site located at 7400 Cathedral Oaks Road (Assessor's Parcel Number 077-530-019) in the City of Goleta. The project site is currently fallow, used for woodchip and firewood storage, and contains three vacant structures, including a single-family

residence. The project site is bordered by the Glen Annie Golf Course to the north and east, El Encanto Creek, Northgate Road, and multi-family residential development to the west, and Cathedral Oaks Road and single-family residences to the south. Although designated for Agriculture in the City of Goleta General Plan/Coastal Land Use Plan and zoned AG-40 (Agriculture II, 40-acre minimum lot size), the project site has not supported agricultural activity since the mid-1990s. The project site includes areas mapped as Environmentally Sensitive Habitat Area and portions within the Streamside Protection Area (SPA) buffer of El Encanto Creek. The project site is also located within a Very High and High Fire Hazard Severity Zone, as designated by the California Department of Forestry and Fire Protection.

Project Characteristics

The proposed project involves the demolition of the existing on-site residence, garage, and barn; subdivision of the existing 14.38-acre parcel into 59 separate lots via a Vesting Tentative Map; construction and occupancy of 56 single-family residences on Lot 1 through Lot 56 that would range from extremely low income to above-moderate income levels; and use of Lot 57, Lot 58, and Lot 59 for open space containing landscape and stormwater facilities.

The proposed project is a qualified housing development project that utilizes the "Builder's Remedy" protections of the California Housing Accountability Act. Accordingly, pursuant to California Government Code Section 65589.5(f)(6)(A), because there are no general plan designation or zoning classification that allow the density and unit type proposed by the applicant, the project would be evaluated for consistency with the regulations of the RS-7 zone district. Components of the proposed project which are not consistent with the RS-7 zone would be evaluated consistent with California Density Bonus Law. As part of the proposed project, the project applicant requests the following concessions/incentives or waivers pursuant to Government Code Section 65915(a):

- Four waivers from the RS-7 zone district standards:
  - Proposed lot widths of less than the 65 feet required in the RS-7 zone on 31 of the 56 proposed residential lots.
  - Proposed rear yard setbacks of less than the 25 feet required on 51 of the 56 proposed residential lots.
  - Proposed side yard setbacks of less than the 6.5' required on 32 of the 56 proposed lots. The reduction accommodates eaves on no less than 5 feet to the property line.
  - Allowed maximum floor area of 35 houses exceeding the maximum permitted floor area from 208 to 1,539 additional square feet. These floor area exceedances would occur on Lots 1 through 14, 20 through 23, 25 through 29, 32, 34, 36, 40, 41, 45, 46, 48, 50, 52, and 55.
- Encroachment into the required 100-foot SPA buffer[1] of approximately 7,786 square feet (0.18 acres) in the rear yards of Lots 1 through 8. portions of the houses on Lots 1 and 2, and for portions of sidewalk in Lot 38. To compensate for SPA buffer encroachment, the proposed project design includes 0.21 acre of additional open space provided outside of and adjacent to the edge of the 100-foot SPA buffer on proposed Lot 58..

[1] The 100-foot SPA buffer is required by Goleta General Plan/Coastal Land Use Plan Conservation Element Policy 2.2:Streamside Protection Areas.

Residential Development

The proposed project includes 56 single-family residences across five floor plan types, ranging from approximately 1,765 to 3,870 square feet. The typical roof height would range from approximately 17 feet 9 inches for single-story residences to 23 feet 10 inches for two-story residences. Lot sizes would vary between roughly 7,000 and 19,500 square feet. Residences would incorporate sustainable design features consistent with City and State requirements, including Energy Star appliances, low-flow plumbing fixtures, and solar photovoltaic systems in compliance with California Building Code Title 24, Part 6.

Lighting

Residential lighting is proposed to include entry lighting at the front and back doors and additional pathway lighting. All exterior lighting in common areas and on individual parcels would be designed to meet the City's "dark sky" and low energy use requirements, including full shielding, the use of full cut-off lights, and directing exterior lighting downward per City of Goleta standards identified in Chapter 17.35 of the City's Municipal Code.

Landscaping and Stormwater Control

The proposed landscape plan incorporates integrated stormwater and water quality features across the project site. The proposed project would introduce 5.59 acres of impervious surface. Stormwater from the western and central areas of the project site would flow through two 18-inch storm drains to a detention basin in the southwest corner. Stormwater in the detention basin would be directed to an existing storm drain pipe that outlets to El Encanto Creek. Stormwater from the eastern and northern areas of the project site would flow into catch basins and an underground detention system near Cathedral Oaks Road, which discharges to an existing storm drain. Additional stormwater drainage features would include rain barrels at each residence, curb extensions, permeable pavers, bioswales, and vegetated swales, all of which would help capture, filter, and reuse runoff. The plant palette would include native and non-invasive screen shrubs, accent trees, and canopy trees suited to Goleta's climate, and the irrigation system would use low-volume spray heads, bubblers, and drip lines controlled by a seasonal timer to reduce water use.

Additional Improvements

The proposed project would include improvements to the open space lots, such as a community picnic area on Lot 57 and frontage landscaping and screening on Lot 59. Infrastructure improvements would include a looped internal road system with one cul-de-sac, two intersections with Cathedral Oaks Road, and a five-foot-wide interior sidewalk throughout the project site. Additionally, the proposed project would include frontage improvements along approximately 890 linear feet of Cathedral Oaks Road between Northgate Drive to the west and the Glenn Annie golf course property to the east. Frontage improvements would consist of two driveway entrances to the project site, curb and gutter improvements, and continuation of an existing Class I[2] trail that extends east of the project site and runs parallel to Cathedral Oaks Road.

[2] A Class I trail is a pathway that provides an exclusive right-of-way for bicycle and pedestrian use and minimizes vehicle cross flows (i.e., the locations which a vehicle can cross the pathway).

Utilities

The proposed project would include underground connections for sewer, water, cable television, and electricity. The proposed project would be all-electric and would not require natural gas connections. Water service would be provided by the Goleta Water District. Sewer service would be provided by Goleta West Sanitary District. Electricity would be provided by Southern California Edison or Central Coast Community Energy. Telecommunications services would be provided by a variety of companies, including Verizon and AT&T. Solid waste services would be provided by Marborg Industries.

Demolition and Grading

The project would involve the demolition of the existing on-site residence, garage, and barn, totaling 3,893 square feet. Preliminary raw[3] earthwork volumes are estimated at 27,500 cubic yards of cut and 23,500 cubic yards of fill. The 4,000 cubic yards of excess cut would be hauled to the Tajiguas Landfill, located at 14470 Calle Real in unincorporated Santa Barbara County. Existing project site elevations range from 145 to 252 feet above mean sea level, with an average slope of 7.8 percent. The finished grade would range from approximately 150 to 245 feet. Grading for the 56 new homes would include site-wide earthwork and installation of two 18-inch storm drains beneath the western internal roadway, which would direct stormwater to a detention basin in the southwest corner of the project site. The basin would be directed to an existing storm drain pipe that outlets to El Encanto Creek.

Streamside Protection Area Buffer Encroachment

The City's SPA policy (General Plan/Coastal Land Use Plan Policy CE 2.2) requires a 100-foot buffer between development and the edge of the El Encanto Creek riparian corridor, which may be reduced to no less than 25 feet under certain conditions. The project site includes approximately 1.12 acres (49,148 square feet) of SPA buffer. Approximately 7,786 square feet of proposed residential development would encroach into the SPA buffer, including portions of homes on Lots 1 and 2 and rear yards on Lots 1 through 8. Approximately 11,283 square feet of proposed stormwater detention would be located in the SPA buffer on Lot 58. Additional improvements within the SPA buffer include a meandering walking path, landscaping, trenching for a new 90-foot-long storm drain pipe, and roughly 65 linear feet of sidewalk. A waiver pursuant to State Density Bonus Law is being utilized to allow the encroachment of these proposed project features in the SPA buffer. The landscaping proposed in the SPA buffer on Lot 58 is intended to protect the biologic value and function of the stream.

Construction Timeline

Construction is anticipated to start in January 2027. The total duration for all construction phases for the proposed project is estimated to be 14 to 18 months, once building permits are issued. No phasing plan is proposed.

[3] "Raw" earthwork volumes have not been factored to account for changes in volume due to bulking, over excavation and recompaction, and construction methods.

Project Objectives

The proposed project is intended to meet the following objectives:

1. Develop up to 56 residential units on underutilized land located within Goleta.
2. Provide residential development in Goleta to fulfill the housing stock envisioned in the City's adopted 2023-2031 Housing Element.
3. Provide housing opportunities for extremely low income, lower income, and moderate income-level persons to support the City in complying with its Regional Housing Needs Allocation requirements.
4. Improve accessibility and encourage active transportation for bicycles and pedestrians in Goleta.
5. Design residences to incorporate green building measures to encourage the use of energy and water efficient technology.

Required Approvals

The proposed project would require City approval for the demolition permit for existing structures, Vesting Tentative Map (05-154-VTM), Development Plan (05-154-DP), requested concessions/incentives or waivers, reduction of the El Encanto Creek 100-foot SPA buffer pursuant to State Density Bonus Law, and building permits for new residences. The proposed project would also require approval from the State Water Resources Control Board, California Department of Fish and Wildlife, Central Coast Regional Water Quality Control Board, Santa Barbara County Fire District, and Goleta Water District. For a full list of project-related approvals, refer to Chapter 2, *Project Description*, Section 2.4, *Required Approvals*.

Alternatives

As required by CEQA, this Revised EIR examines alternatives to the proposed project. Studied alternatives include the following two alternatives.

- Alternative 1: No Project Alternative
- Alternative 2: No Project Alternative (By-Right Development)
- Alternative 3: Mixed-Use Alternative

Alternative 1 (No Project Alternative) assumes that the proposed project is not approved and the site remains in its existing condition. The existing setting includes a 2,015-square-foot residence, 726-square-foot garage, and 1,152-square-foot barn. The site was previously used for avocado orchards until the mid-1990s and is currently used for woodchip and firewood storage. Under this alternative, the existing project site and uses would be maintained.

Alternative 2 (No Project Alternative [By-Right Development]) assumes the project site would be developed with land uses that are allowed by-right pursuant to the Goleta Municipal Code. In accordance with the AG-II zoning district, the re-establishment of the avocado orchard or the establishment of other agricultural operations could occur without requiring discretionary approvals. For the purposes of this analysis, Alternative 2 would include the largest amount of structural development allowable on the project site by right, which would be a complex of greenhouses totaling 20,000 square feet in floor area (e.g., 10 greenhouses at 2,000 square feet each), and 12 units

provided for farmworker housing. The greenhouses would be powered with solar panels, with backup generators on-site in the event of solar panel failure. The residence also could be enlarged, or a new, larger residence could be constructed, as long as the new development complied with the 35-foot height limitation and minimum setback of 10 feet from the centerline of Cathedral Oaks Road. Row crops, orchards, or animal grazing would also be allowed over most of the project site. Based on allowable uses and the above assumptions, Alternative 2 would include expansion of the existing single-family residence to 4,900 square feet.

Alternative 3 (Mixed-Use Alternative) would include 56 residential units, including multifamily (such as duplexes, triplexes, or other medium-density residential buildings), as well as commercial space and daycare space within the same development footprint as the proposed project. The multifamily residences would allow for increasing the residential density on a portion of the project site to accommodate the same number of proposed units as the proposed project as well as a neighborhood market, workspace, and daycare totaling approximately 12,000 square feet to serve the residences onsite. For the purposes of this analysis, it is assumed that the land cover amount would be similar to that of the proposed project, with the same scope of development activities within the same project footprint as the proposed project.

Environmentally Superior Alternative

Based on the alternatives analysis, Alternative 2 (By-Right Development) would be the environmentally superior alternative because this alternative would result in a less than significant VMT impact, compared to the proposed project's significant and unavoidable VMT impact. However, Alternative 2 would fail to meet the following project objectives:

- Develop up to 56 residential units on underutilized land located within Goleta.
- Provide housing opportunities for extremely low income, lower income, and moderate income-level persons to support the City in complying with its Regional Housing Needs Allocation requirements.
- Improve accessibility and encourage active transportation for bicycles and pedestrians in Goleta.

In addition, Alternative 2 would only partially meet the following project objective as Alternative 2 would only include one residential unit with the remaining 12 units restricted to farmworker housing:

- Provide residential development in Goleta to fulfill the housing stock envisioned in the City's adopted 2023-2031 Housing Element.

Areas of Controversy and Issues To Be Resolved

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 potential impacts related to agricultural land conversion, air quality, biological resources, hydrology and water quality, land use and planning, noise, recreation, transportation, utilities and service systems, and tribal cultural resources. Responses to the Notice of Preparation of the Draft EIR are summarized in Chapter 1, *Introduction*.

Summary of Environmental Impacts and Mitigation Measures

Table ES-1 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.
- **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.
- **Class III, Less than Significant.** An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures.
- **Class IV, Beneficial.** An impact that would reduce existing environmental problems or hazards.
- **No Impact.** Occurs when the proposed project does not have any potential to result in any impact associated with the specific significance criteria evaluated within the impact analysis.

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

Impact	Mitigation Measure(s)	Residual Impact
Aesthetics and Visual Resources		
Impact AES-1. While the proposed project would result in some changes to existing views, the design of the project would not result in substantial, adverse changes to identified scenic corridors or resources from public viewpoints in the project vicinity. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Impact AES-2. The project site is not visible from a state scenic highway and, therefore, would not substantially damage scenic resources within a state scenic highway. No impact would occur.	None required.	No impact.
Impact AES-3. The project would be consistent with applicable zoning and other regulations that govern scenic quality, including the City of Goleta General Plan/Coastal Land Use Plan and Goleta Zoning Code. Impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact AES-4. The project would introduce on-site sources of light and glare. Compliance with the City's exterior night lighting and spillover restrictions would ensure that light or glare would not adversely affect views in the area. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Cumulative Impacts. Cumulative impacts related to aesthetics would be less than significant.	None required.	Cumulative impacts would be less than significant.
Air Quality		
Impact AQ-1. The proposed project's residential development would facilitate a population increase of approximately 145 people, which would not result in a population exceeding the growth forecasts used within the applicable Air Quality Management Plan. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Impact AQ-2. Construction and operation of the proposed project would generate criteria air pollutant emissions; however, these emissions would not exceed applicable thresholds set forth by the Santa Barbara Air Pollution Control District. Therefore, the 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. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Impact AQ-3. Construction of the proposed project would result in pollutant emissions; however, these emissions would be short-term and minimized with use of Tier 4 construction equipment and compliance with Santa Barbara County Air Pollution Control District Rules 323.1, 329, and 345. Operation of the project would not involve the use of equipment that would result in substantial pollutant concentrations and therefore would not expose sensitive receptors to substantial pollutant concentrations. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Impact AQ-4. Project construction would result in odors associated with construction equipment use that would dissipate rapidly from their sources and would be temporary and intermittent. Project operation would not result in substantial odors because the proposed project does not include facilities that could cause substantial odors. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Cumulative Impacts. Cumulative impacts related to conflicts with the 2022 Ozone Plan, the release of cumulative considerable criteria air pollutant emissions, and odor generation would be less than significant. Cumulative impacts related to exposing sensitive receptors to substantial pollutant concentrations would be significant, but the proposed project's contribution would not be considerable.	None required.	Cumulative impacts related to conflicts with the 2022 Ozone Plan, the release of cumulative considerable criteria air pollutant emissions, and odor generation would be less than significant. Cumulative impacts related to exposing sensitive receptors to substantial pollutant concentrations would be potentially significant. The project's contribution would not be considerable.

Impact	Mitigation Measure(s)	Residual Impact
Biological Resources		
Impact BIO-1. Project construction has the potential to result in direct and indirect impacts to Santa Barbara honeysuckle, ocellated Humboldt lily, black-flowered figwort, western red bat, and nesting birds. With implementation of regulatory requirements and Mitigation Measures NOI-1 and BIO-1 through BIO-6, the project's construction impact would be Class II, *less than significant with mitigation*. Project operation would be limited to residential uses and would have a Class III, less than significant, impact to special-status species.	Mitigation Measure NOI-1 is required. **BIO-1. Special-Status Plant Surveys and Avoidance** Prior to the start of construction activities, including vegetation removal, a City-approved, qualified biologist (retained by the project applicant) shall conduct a spring special-status plant survey within the areas of proposed ground disturbance. The survey shall be conducted during the appropriate season (March–April) and in suitable habitat to detect rare annual plant species (ocellated Humboldt lily [*Lilium humboldtii* ssp. *ocellatum*] and black-flowered figwort [*Scrophularia atrata*]) and additional individuals of Santa Barbara honeysuckle (*Lonicera subspicata var. subspicata*) that may not have been observed during previous surveys conducted on June 20, July 11, July 21, August 22, November 3, and November 5, 2025 as part of the *Biological Assessment Report for the Shelby Residential Development Project* (Watershed Environmental, Inc. 2025). The survey shall be conducted in accordance with the CNPS Botanical Survey Guidelines (2001), CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (2018), and the USFWS General Rare Plant Survey Guidelines (Cypher 2002). Reference sites shall be visited to confirm detectability of target species prior to initiating the survey. Within 24 hours of completing the spring survey, the qualified biologist shall prepare and submit a brief letter report documenting the survey methods and results to the City of Goleta's Planning and Environmental Review Director, or designee, for review and approval. A second pre-construction special-status plant survey shall be conducted by the qualified biologist no more than two weeks prior to the initiation of vegetation removal and construction activities. The biologist shall prepare a brief letter report summarizing the survey results within 24 hours of completing the survey and submit it to the City of Goleta's Planning and Environmental Review Director, or designee, for review and approval. If construction has not commenced within two years of the most recent survey, the special-status plant survey shall be repeated prior to the start of construction. If special status plant species are detected during the spring and/or pre-construction special status plant surveys, the project applicant shall implement Mitigation Measure BIO-2. **Plan Requirements and Timing**. The spring and pre-construction special-status plant surveys shall be conducted by the qualified biologist prior to issuance of Zoning Clearance for the grading permit. The qualified biologist shall prepare and submit a brief letter report summarizing the results of each survey to the City of Goleta's Planning and Environmental Review Director within 24 hours of completing the survey. If construction has not commenced within two years of the most recent survey, the special-status plant survey shall be repeated prior to the start of construction. **Monitoring.** The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the survey results and maintain documentation on file. **BIO-2. Rare Plant Protection Plan** Prior to issuance of Zoning Clearance for the grading permit, the project applicant shall retain a City-approved, qualified biologist to prepare a Rare Plant Protection Plan for review and approval by the City of Goleta's Planning and Environmental Review Director, or designee. The Rare Plant Protection Plan shall focus on special-status species with potential to occur on-site (Santa Barbara honeysuckle, ocellated Humboldt lily, and black-flowered figwort) and shall include: ▪ Establishment of avoidance buffers for special-status plant species and habitat that supports special-status plants outside of the project's disturbance area. ▪ Specifications for temporary rare plant protection fencing (minimum 4 feet tall, metal posts spaced no more than 8 feet apart). ▪ Locations of fencing depicted on grading plans. ▪ "Rare Plant Protection Zone – Keep Out" signage posted at 20-foot intervals. ▪ Maintenance requirements to ensure fencing remains upright and effective throughout construction. The qualified biologist shall inspect the fencing and signage and establish avoidance buffers prior to the start of construction and shall submit written confirmation to the City of Goleta's Planning and Environmental Review Director, or designee, that the fencing has been installed in accordance with the approved plan. **Plan Requirements and Timing.** The Rare Plant Protection Plan shall be finalized by the qualified biologist and approved by the City of Goleta's Planning and Environmental Review Director, or designee, prior to issuance of Zoning Clearance for the grading permit. Fencing, signage, and avoidance buffers shall be installed by the qualified biologist prior to the start of construction and maintained throughout the duration of construction activities. **Monitoring.** The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the Rare Plant Protection Plan and restoration plan, maintain documentation on file, and conduct periodic inspections to ensure compliance with fencing, signage, and restoration requirements. **BIO-3. Habitat Restoration and Rare Plant Mitigation** Prior to issuance of Zoning Clearance for the grading permit, the project applicant shall retain a City- approved, qualified biologist to prepare a Habitat Restoration Plan consistent with the provisions of Goleta Municipal Code Section 17.30.030(D) to restore and mitigate impacts to native vegetation communities and special-status plant species. Restoration and mitigation shall occur on the project site if feasible . The plan shall provide for: ▪ Restoration of temporarily disturbed native vegetation (including black sage – California sagebrush scrub, arroyo willow thicket, and eucalyptus grove) at a minimum 1:1 ratio.	Construction impacts would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant.

Impact	Mitigation Measure(s)	Residual Impact

- Mitigation for permanent impacts to black sage – California sagebrush scrub, arroyo willow thicket, and eucalyptus grove at a minimum 3:1 ratio.
- Mitigation for removal of rare plant species, including Santa Barbara honeysuckle (Lonicera subspicata var. subspicata), ocellated Humboldt lily (Lilium humboldtii ssp. ocellatum) and black-flowered figwort (Scrophularia atrata) at a minimum 10:1 ratio.
- All plant materials used for restoration and mitigation shall be locally sourced from the Goleta or Devereux Slough watersheds or adjacent watersheds. The plan shall specify:
- Quantity, species, and container size of plant materials to be installed.
- Annual performance standards for vegetation growth, cover, and survival.
- Success criteria requiring a minimum of 85 percent native vegetation cover and/or rare plant survival after five years.
- Maintenance activities to support plant establishment and long-term viability.
- Frequency of biological monitoring (by the qualified biologist) and reporting requirements (to the City of Goleta's Planning and Environmental Review Director).

Plan Requirements and Timing. The Habitat Restoration Plan shall be submitted to the City of Goleta's Planning and Environmental Review Director, or designee, for review and approval prior to issuance of Zoning Clearance for the grading permit. Restoration and mitigation planting shall occur during the first planting season following completion of construction in impacted areas. Rare plant mitigation shall be implemented concurrently with native vegetation restoration.

Monitoring. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the Habitat Restoration Plan and maintain documentation on file. The qualified biologist shall conduct biological monitoring in accordance with the approved plan and submit status reports to the City of Goleta's Planning and Environmental Review Director for five years following installation. The City of Goleta's Planning and Environmental Review Director, or designee, shall conduct periodic inspections to verify compliance with restoration goals, including vegetation cover, species composition, and rare plant survival.

BIO-4. Biological Monitoring and Worker Education

Prior to initiation of construction activities, the project applicant shall retain a City-approved, qualified biologist familiar with special-status plant and wildlife species with the potential to occur in the project work area. The qualified biologist shall be present on-site daily during grading and vegetation removal. The monitor shall be responsible for the following:

- Ensure that procedures for verifying compliance with biological resource mitigation measures are followed.
- Lines of communication and reporting methods.
- Guiding the construction contractor in marking/flagging construction area limits.
- Conducting construction crew Worker Environmental Awareness Program (WEAP) training.
- Authority to stop non-emergency work.
- Action to be taken in the event of non-compliance.
- Conducting daily wildlife clearance surveys prior to any grading, turf removal, other vegetation removal.
- Inspecting ESHA fencing around sensitive habitats.
- Preparing monitoring summaries of special-status species' presence, or the lack thereof, on the project site during grading or vegetation removal.

All construction personnel shall attend a WEAP training conducted by the qualified biologist prior to commencement of construction activities. The construction contractor(s) shall be responsible for ensuring that all new personnel receive the training after construction is initiated. The WEAP shall include a description of a special-status species potentially present in the area, jurisdictional habitats present proximate to the project site, information on sensitive habitats to be avoided, and specific measures that shall be implemented to protect special-status species. Special-status plant species addressed in the WEAP training shall include, at a minimum, Santa Barbara honeysuckle, ocellated Humboldt lily, and black-flowered figwort. Species-status wildlife species addressed in the WEAP, at a minimum, shall include western red bat.

Plan Requirements and Timing. The qualified biologist shall be present on-site daily during grading and vegetation removal. This measure shall be incorporated into the grading plans and the WEAP shall be available on-site during construction. The qualified biologist shall submit a monitoring summary to the City of Goleta's Planning and Environmental Review Director within 30 days after completing each phase of construction.

Monitoring: Records of construction worker WEAP participation shall be kept on file with the City of Goleta's Planning and Environmental Review Director for the duration of construction. Monitoring summaries shall be kept on file with the City for the duration of construction.

BIO-5. Bat Roost Avoidance and Protection

To avoid disturbance to western red bats (Lasiurus blossevillii), ground disturbance and tree removal shall occur outside of the bat maternity season (April 1 to August 31). If ground disturbance or tree removal must occur during this period, the project applicant shall retain a City-approved, qualified biologist to conduct two nighttime acoustic bat surveys no more than two weeks prior to tree removal within the disturbance footprint, plus a 300-foot buffer. Surveys shall be conducted using ultrasonic microphones capable of detecting bat echolocation calls and shall last a minimum of one hour each. Survey conclusions shall be reviewed and approved by the City of Goleta's Planning and Environmental Review Director, or designee, prior to initiation of construction.

Impact	Mitigation Measure(s)	Residual Impact
	If bat activity is detected, the qualified biologist shall conduct a daytime visual inspection of trees for signs of active roosts, including guano, insect carcasses, or direct observation of bats. If any active roosts are found, the City-approved biologist shall establish a 100-foot buffer. The construction contractor shall ensure that no ground disturbance or tree removal occurs within the buffer until the City-approved biologist confirms the breeding season has concluded or the roost is no longer active and removes the buffer. If work within the buffer is necessary, a City-contracted biological monitor (funded by the project applicant) shall monitor the active roost full-time during construction activities within the buffer to ensure project activities are not indirectly impacting roosting bats. **Plan Requirements and Timing.** Within 24 hours of completing the surveys (and prior to initiation of tree removal activities), the qualified biologist shall prepare a brief report summarizing the methods and results of the acoustic and visual bat surveys and submit it to the City of Goleta's Planning and Environmental Review Director. **Monitoring.** The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the bat survey results prior to commencement of tree removal activities and maintain documentation on file. The City of Goleta's Planning and Environmental Review Director shall conduct periodic inspections to ensure that tree removal activities comply with seasonal restrictions and avoidance measures for active bat roosts. **BIO-6. Pre-construction Nesting Bird Surveys and Avoidance** 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, qualified biologist (retained by the project applicant) 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 City of Goleta's Planning and Environmental Review Director, or designee. Survey conclusions shall be reviewed and approved by the City of Goleta's 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 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 the City of Goleta's General Plan/Coastal Land Use Plan Policy CE 8.3. The buffer shall be 300 feet in compliance with the City of Goleta's General Plan/Coastal Land Use Plan Policy CE 8.4. If the 300-foot buffer is infeasible, the City-approved biologist may reduce the buffer distance as appropriate, depending 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 project applicant) 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 days prior to commencement of any demolition, grading, and/or vegetation removal activities. Survey conclusions shall be reviewed and approved by the City of Goleta's 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 City of Goleta's 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. The City of Goleta's Planning and Environmental Review Director, or designee, shall conduct periodic spot checks to ensure that construction does not occur within the buffer during construction.	

Impact	Mitigation Measure(s)	Residual Impact
Impact BIO-2. Project construction may result in direct and indirect impacts to arroyo willow thicket, black sage – California sagebrush scrub, and eucalyptus grove that serves as raptor roosting habitat ESHA. Following implementation of Mitigation Measures BIO-3, BIO-4, and BIO-7, the project's construction impact would be Class II, less than significant with mitigation. Project operation would be limited to residential uses and landscaping activities and would have a Class III, less than significant, indirect impact on riparian habitat and sensitive natural communities.	Mitigation Measures BIO-3 and BIO-4 are required. **BIO-7. Protection of Environmentally Sensitive Habitat Areas** Construction methods shall include hand-trimming of vegetation rather than removal where feasible. The project applicant shall retain a City-approved, qualified biologist who shall install temporary construction fencing between the ESHA area that would be disturbed (during installation of the new storm drain pipe, construction of the new bike path along Cathedral Oaks Road, grading in the southwestern corner of the project site to construct the detention basin, and grading and building construction within eucalyptus grove along El Encanto Creek) and the adjacent ESHA to be protected. The fencing shall be a minimum of 4 feet tall, attached to metal fence posts spaced no more than 8 feet apart, and shall include "Environmentally Sensitive Habitat Area – Keep Out" signage posted at 20-foot intervals. The fencing and signage shall be installed prior to the start of construction activities and shall be maintained in an upright and functional condition for the duration of construction in these areas. No construction activities shall occur in the fenced ESHA designated to be protected. **Plan Requirements and Timing.** Specification for hand-trimming of vegetation, as well as the location and specifications of the temporary construction fencing, shall be included in the final construction plans and reviewed by the City of Goleta's Planning and Environmental Review Director, or designee, prior to issuance of Zoning Clearance for the grading permit. Fencing and signage shall be installed prior to any ground disturbance and maintained throughout the duration of construction activities in proximity to Environmentally Sensitive Habitat Area. **Monitoring.** The qualified biologist shall install the fencing and signage prior to the start of construction and confirm proper installation by writing to the City of Goleta's Planning and Environmental Review Director. The City of Goleta's Planning and Environmental Review Director shall conduct periodic inspections to ensure vegetation is hand-trimmed where feasible and fencing remains in place and in good condition throughout construction.	Construction impacts would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant.
Impact BIO-3. Project construction may result in a potentially significant impact to riparian habitat associated with El Encanto Creek, which may be a jurisdictional resource. Following implementation of Mitigation Measures BIO-3 and BIO-4, the project's construction impact would be Class II, less than significant with mitigation. Project operation would be limited to residential uses and landscaping activities and would have a Class III, less than significant, impact on jurisdictional resources.	Mitigation Measures BIO-3 and BIO-4 are required.	Construction impacts would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant.
Impact BIO-4. Project construction would have the potential to result in substantial disturbances to wildlife movement through the introduction of noise, which would be a potentially significant impact. Construction impacts related to light and increased human presence would not be substantial. With implementation of Mitigation Measure NOI-1, the project's construction impact would be Class II, less than significant with mitigation incorporated. Project operation would not substantially interfere with the movement of any native resident or migratory fish or wildlife species, and impacts would be Class III, less than significant.	Mitigation Measure NOI-1 is required.	Construction impacts would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant.
Impact BIO-5. The proposed project would be potentially inconsistent with City of Goleta General Plan/Coastal Land Use Plan Policies CE 1.6, CE 1.9, CE 2.3, CE 5.3, and CE 9.5, as well as the Goleta Municipal Code, as project construction would potentially impact ESHA, ESHA and SPA buffers, and protected trees. Following implementation of Mitigation Measures BIO-3, BIO-4, BIO-7, and BIO-8, the proposed project would be inconsistent with Policies CE 1.9 and CE 2.3 but the proposed project's impact involving conflict with local policies or ordinances protecting biological resources would be Class II, less than significant with mitigation.	Mitigation Measures BIO-3, BIO-4, and BIO-7 are required. **BIO-8. Tree Protection Measures** The construction contractor shall implement the following tree protection measures to ensure that impacts to protected trees, including native coast live oak trees outside of the project site, are minimized to the extent feasible or avoided, consistent with the City of Goleta's General Plan/Coastal Land Use Plan Policy CE 9.5, the City's Urban Forest Management Plan, and Goleta Municipal Code Chapter 15.09 (Grading, Erosion and Sediment Control), prior to the start of project construction. The following tree protection measures shall be included within the project construction plans, including the grading and landscaping plans. All measures below shall be conducted by or under the direct supervision of an International Society of Arboriculture (ISA) certified arborist retained by the project applicant: **Prior to Construction** ▪ A certified arborist or qualified biologist under the supervision of the certified arborist shall monitor any ground disturbance, vegetation removal, and fencing installation activities that have a potential to impact the protected trees. ▪ Temporary fencing such as snow fencing, not less than 3 feet high with tree protection signs shall be erected around the three protected trees to be preserved that have a potential to be impacted during construction. The protective fence shall be installed at the protected zone boundary of each tree, which is defined as the critical root zone. The contractor shall maintain the fence to keep it upright, taut and aligned during active construction. Fencing shall be in place and inspected by a City approved biologist prior to the start of activities with the potential to impact protected trees. Fencing shall be removed only after all construction activities with the potential to impact the protected trees are complete. ▪ A pre-construction meeting shall be held between all contractors (including grading, tree removal/pruning, builders, etc.) and the project arborist. The meeting shall focus on instructing the contractors on tree protection practices. All equipment operators and spotters, assistants, or those directing operators from the ground shall provide written acknowledgement of their receiving tree protection training. This training shall include information on the location and marking of the protected trees, the necessity of preventing damage, and the discussion of work practices that will accomplish such.	Class II, less than significant with mitigation incorporated.

Impact	Mitigation Measure(s)	Residual Impact
	Protection and Maintenance During Construction ▪ Contractors shall avoid heavy equipment operations, grade changes, ponding water, and fill or compaction within the protected tree zone unless where specifically approved and under the supervision of a certified arborist or qualified biologist in direct communication with the certified arborist. ▪ Contractors shall ensure that damage to the tree be avoided to the extent feasible when transporting or moving construction materials and working within or adjacent to the protected zone). If contact with the tree crown is unavoidable, affected branches may be pruned by a qualified arborist under supervision of a certified arborist and shall adhere to industry standards. ▪ Except where specifically approved in writing beforehand, all trenching shall be done outside of the fenced protected zone. Where trenching is necessary in areas that contain roots from retained trees, contractors should use trenching techniques that include the use of either a root pruner or an Air-Spade to limit root impacts. A certified arborist or qualified biologist in direct communication with the certified arborist shall ensure that all pruning cuts be clean and sharp to minimize ripping, tearing, and fracturing of the root system. Use of both root-pruning and Air-Spade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench should be made no deeper than necessary, and when possible, alternatives to trenching should be utilized. ▪ The contractor shall be responsible for irrigating (deep watering) the trees in the summer and fall irrigation as necessary and determined by a certified arborist. One irrigation cycle shall thoroughly soak the root zones of the trees to a depth of two feet. The soil shall be allowed to dry out between watering to avoid keeping consistently wet soil. Soil moisture shall be checked with a soil probe before irrigating. The area within three feet of the trunk shall never be soaked, especially in summer months. ▪ If any protected trees are damaged to the point where continued viability is threatened, as determined by a certified arborist, the tree shall be replaced at a 3:1 ratio with like species grown from locally obtained seed. Replacement shall occur on site as feasible, or off site (within the same watershed) if on site replacement is not feasible. Replacement trees shall be monitored for a period of five years. **Maintenance After Construction** ▪ The contractors shall ensure that the mulch is kept a minimum one foot away from the trunk base and no more than 8 inches deep to avoid creating conditions favorable to the establishment and growth of decay-causing fungal pathogens. ▪ **Plan Requirements and Timing**: The project applicant shall submit the construction plans that include the tree protection measures to the City of Goleta's Planning and Environmental Review Director for review and approval prior to issuance of Zoning Clearance for the grading permit. **Monitoring**: The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the construction plans to ensure this measure is included. The City of Goleta's Planning and Environmental Review Director, or designee, shall approve the arborist prior to Zoning Clearance for the grading permit.	
Impact BIO-6: The proposed project is not within the jurisdiction of 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 Impact. Cumulative impacts related to conflict with biological resource plans and policies would be less than significant. Cumulative impacts related to special-status species, riparian habitats, sensitive natural communities, wetlands, and wildlife movement would be potentially significant, but the proposed project's contribution would not be considerable.	None required beyond project-level mitigation measures.	Cumulative impacts related to conflict with biological resource plans and policies would be less than significant. Cumulative impacts related to special-status species, riparian habitats, sensitive natural communities, wetlands, and wildlife movement would be potentially significant, but the proposed project's contribution would not be considerable.
Cultural Resources		
Impact CUL-1. The project site does not contain any historic resources; therefore, the project would not create a substantial adverse change in the significance of a historical resource. No impact would occur.	None required.	No impact.

Impact	Mitigation Measure(s)	Residual Impact
Impact CUL-2. Project construction would involve ground disturbing activities such as grading and excavation, which could potentially result in disturbance of unanticipated archaeological resources. With implementation of Mitigation Measures CUL-1 through CUL-3, this impact would be reduced to Class II, less than significant with mitigation incorporated.	**CUL-1. Archaeological Monitoring** Prior to ground disturbance activities, the project applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards (qualified archaeologist) and has experience in California prehistoric and historic resources (experience within City of Goleta or Santa Barbara County preferred). The project applicant shall provide proof of retainment of the qualified archaeologist to the City of Goleta's Planning and Environmental Review Director, or designee, prior to the issuance of Zoning Clearance for the grading permit. The qualified archaeologist shall prepare a Cultural Resource Monitoring and Inadvertent Discovery Plan, conduct archaeological monitoring, and address any inadvertent discoveries identified during project implementation (refer to Mitigation Measure CUL-4). The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the Plan prior to the issuance of Zoning Clearance for the grading permit. The Plan shall outline archaeological and Native American resource monitoring protocols, as well as a program for treatment and mitigation in the case of an inadvertent discovery of cultural resources during project-related ground-disturbance. The Plan shall also provide for the proper identification, evaluation, treatment, and protection of any cultural resources in accordance with CEQA throughout the duration of the project. The Plan shall be incorporated and referenced in all grading and construction plans intended for use by the construction contractor(s). The qualified archaeologist shall manage archaeological monitoring during initial ground disturbance activities, defined as construction-related earth moving of sediments from their place of deposition. This definition excludes movement of sediments after they have been initially disturbed or displaced by project-related construction. The qualified archaeologist shall oversee and establish monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The qualified archaeologist shall ensure all daily monitoring logs are maintained. The requirement for archaeological monitoring shall be noted on all demolition and grading plans. The qualified archaeologist shall prepare an archaeological monitoring report within 60 days following completion of ground disturbance, and shall submit the archaeological monitoring report to the City of Goleta's Planning and Environmental Review Director, or designee, for review. The archaeological monitoring report shall document compliance with approved cultural resource mitigation measures, include all monitoring efforts, and include an appendix with the daily monitoring logs. The qualified archaeological shall submit the final archaeological monitoring report to the City of Goleta's Planning and Environmental Review Director and the Central Coast Information Center. **Plan Requirements and Timing.** Prior to ground disturbance, the project applicant shall retain a qualified archaeologist. The qualified archaeologist shall create a Plan, conduct monitoring, and address any discoveries during project construction. Proof of retainment shall be provided to the City of Goleta's Planning and Environmental Review Director prior to the issuance of Zoning Clearance for the grading permit. The Plan shall outline monitoring protocols and treatment for any discovered cultural resources, ensuring compliance with CEQA. The Plan shall be referenced in all grading and construction plans. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the Plan prior to the issuance of Zoning Clearance for the grading permit. **Monitoring.** The qualified archaeologist shall manage monitoring during initial ground disturbance, adjusting efforts (decrease, increase, or terminate) based on the potential to encounter cultural deposits. Daily monitoring logs shall be maintained. The qualified archaeologist shall prepare an archaeological monitoring report, documenting compliance and monitoring efforts, and shall submit the archaeological monitoring report to the City of Goleta's Planning and Environmental Review Director, or designee, for review, within 60 days following completion of ground disturbance. The qualified archaeological shall submit the final archaeological monitoring report to the City of Goleta's Planning and Environmental Review Director and the Central Coast Information Center. **CUL-2. Worker Environmental Awareness Program Training** All construction personnel and monitors who are not trained archaeologists shall be briefed regarding unanticipated discoveries of archaeological resources prior to the start of construction activities as part of a Worker Environmental Awareness Program (WEAP) training. A basic presentation shall be prepared and presented by the qualified archaeologist, or their designee, to inform all construction personnel working on the project about the archaeological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event archaeological resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the qualified archaeologist and if appropriate, Native American representative. If new construction personnel are added to the project, the crew foreman shall ensure the new personnel receive the WEAP training before starting work. The necessity of training attendance shall be stated on all demolition, grading, or construction plans and the project applicant shall maintain records demonstrating construction worker WEAP participation. The project applicant shall submit the records of construction worker WEAP participation to the City of Goleta's Planning and Environmental Review Director prior to construction activities and as needed after the addition of new personnel. **Plan Requirements and Timing.** This measure shall be incorporated into the grading, demolition, and construction plans and the WEAP shall be available on-site during construction. **Monitoring.** Records of construction worker WEAP participation shall be kept on file with the City of Goleta's Planning and Environmental Review Director for the duration of construction.	Class II, less than significant with mitigation incorporated.

Impact	Mitigation Measure(s)	Residual Impact
	CUL-3. Unanticipated Discovery of Cultural Resources If unanticipated cultural resources are discovered during project-related ground disturbance, the following procedures shall be implemented: ▪ The construction contractor(s) shall halt work within 50 feet of the find and notify the qualified archaeologist. Temporary fencing must be erected (e.g., orange temporary fence) to prevent damage to the resource along the 50-foot buffer. The qualified archaeologist retained pursuant to Mitigation Measure CUL-2 shall immediately evaluate the resource. ▪ If the resource is determined to be potentially significant, then the qualified archaeologist, project applicant, Native American monitor (if resources are Native American in origin), and City of Goleta's Planning and Environmental Review Director, or designee, shall meet to discuss the significance of the find. At the meeting, a decision shall be made, with the concurrence by the City of Goleta's Planning and Environmental Review Director, or designee, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resource. ▪ Treatment and avoidance of the newly discovered resource(s) shall be consistent with the Plan prepared pursuant to Mitigation Measure CUL-2. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils, and/or re-burial within the immediate vicinity so they are not subject to further disturbance in perpetuity. If avoidance is infeasible, then treatment shall be implemented pursuant to the Plan. The City of Goleta's Planning and Environmental Review Director, or designee, shall make the final determination based on the provisions of CEQA with respect to archaeological resources and recommendations of the qualified archaeologist. ▪ Further ground disturbance, including but not limited to grading and trenching, shall not resume within the area of the discovery until the City of Goleta's Planning and Environmental Review Director, or designee, has determined the appropriate mitigation has been implemented pursuant to the Plan and the qualified archaeologist has notified the construction contractor(s) to resume work. Work shall be allowed to continue outside of the 50-foot buffer area and shall be monitored by additional archaeological monitors, if necessary. ▪ If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, the qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, pursuant to the requirements of the *CEQA Guidelines* Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the treatment plan and archaeological testing as appropriate. The qualified archaeologist shall submit the resulting documentation to the regional repository of the California Historical Resources Information System pursuant to *CEQA Guidelines* Section 15126.4(b)(3)(C). ▪ The qualified archaeologist shall provide evidence of compliance with this mitigation measure, if a significant archaeological resource is found, to the City of Goleta's Planning and Environmental Review Director and the appropriate California Historical Resources Information System Information Center upon completion of the data recovery plan detailing the significance of the resource and treatment findings. **Plan Requirements and Timing.** If unanticipated cultural resources are discovered during ground disturbance, the construction contractor(s) shall halt work within 50 feet of the find and contact the qualified archaeologist. The qualified archaeologist shall evaluate the resource immediately. If the resource is potentially significant, the qualified archaeologist, project applicant, Native American monitor (if applicable), and City of Goleta's Planning and Environmental Review Director, or designee, shall meet to decide on appropriate mitigation. Treatment and avoidance shall follow the Plan from Mitigation Measure CUL-2. The City of Goleta's Planning and Environmental Review Director, or designee, shall make the final determination based on CEQA provisions. Ground disturbance shall not resume in the area until the City of Goleta's Planning and Environmental Review Director, or designee, has verified that mitigation is implemented. Work outside the 50-foot buffer shall continue with additional monitoring if necessary. **Monitoring.** The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the data recovery plan (if applicable). The qualified archaeologist shall submit documentation to the California Historical Resources Information System. The qualified archaeologist shall provide evidence of compliance to the City of Goleta's Planning and Environmental Review Director and the California Historical Resources Information System upon completion.	
Impact CUL-3: Project construction would involve ground disturbing activities, which have the potential to unearth or adversely impact previously unidentified human remains. With adherence to existing regulatory requirements, this impact would be Class III, less than significant.	None required.	Class III, less than significant.
Cumulative Impacts. Cumulative impacts involving the disturbance of human remains would be less than significant**.** Cumulative impacts related to the disturbance of archaeological resources would be significant, but the proposed project's contribution would not be considerable with implementation of Mitigation Measures CUL-1 through CUL-3.	None required beyond project-level mitigation measures.	Cumulative impacts involving the disturbance of human remains would be less than significant. Cumulative impacts related to the disturbance of archaeological resources would be potentially significant. The project's contribution would not be considerable.

Impact	Mitigation Measure(s)	Residual Impact
Geology and Soils		
Impact GEO-1. The project site does not overlie an Alquist-Priolo Fault Zone or other active fault zones. No impact would occur.	None required.	No impact.
Impact GEO-2. The project site is located in a seismically active region and may be subject to strong ground shaking during a major earthquake. Structures would be designed in accordance with the California Building Code and Mitigation Measure GEO-1 would require incorporation of seismic design recommendations from the Preliminary Geotechnical Report, which would reduce impacts involving seismic ground shaking. This impact would be Class II, less than significant with mitigation incorporated.	**GEO-1. Geotechnical Design** The applicant's project design engineer shall incorporate the recommendations within of the Geotechnical Investigation prepared for the project into the project's grading and building plans. These include, but are not limited to, requiring existing fill and soft material to be excavated to firm native soil, the use of cut pads for compaction control, and the use of piers for stability of the residences. 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 a Zoning Clearance for the grading and building permits for the project. The applicant shall also retain a licensed geotechnical professional approved by the Planning and Environmental Review Director or designee prior to the start of construction. The licensed geotechnical professional shall be responsible for ensuring proper implementation of the recommendations within the final Geotechnical Investigation prepared for the project and providing a report to the Planning and Environmental Review Director or designee certifying the recommendations below have been incorporated into project design and throughout construction prior to the issuance of a certification of occupancy. **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 Zoning Clearance for the grading and building permits. The Planning and Environmental Review Director or designee shall approve the licensed geotechnical professional prior to the start of construction. The licensed geotechnical professional shall submit the report to the Planning and Environmental Review Director or designee certifying the recommendations have been incorporated prior to the issuance of a certification of occupancy. **Monitoring**. Once during the grading phase of construction, the Planning and Environmental Review Director or designee shall visit the project site to confirm with the licensed geotechnical professional that the construction contractor is implementing the applicable geotechnical recommendations.	Class II, less than significant with mitigation incorporated.
Impact GEO-3. Soils underlying the project site are not loose, saturated granular soils, and have negligible liquefaction potential. Compliance with the California Building Code would ensure the proposed project would minimize the risk of loss, injury, or death involving liquefaction. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Impact GEO-4. Portions of the project site have high landslide potential. However, Mitigation Measure GEO-1 would require incorporation of design recommendations from the Preliminary Geotechnical Report, which would reduce impacts involving landslide risks. This impact would be Class II, less than significant with mitigation incorporated.	Mitigation Measure GEO-1 is required.	Class II, less than significant with mitigation incorporated.
Impact GEO-5. On-site development has the potential to increase erosion during and after construction. Compliance with existing regulations, including the California Building Code and the City's Municipal Code, would ensure the proposed project would minimize the potential for the project to cause substantial soil erosion or the loss of topsoil. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Impact GEO-6. The project site is not at risk of substantial lateral spreading, subsidence, liquefaction, or collapse. However, the project site is located in an area susceptible to landslides. Compliance with the California Building Code and implementation of Mitigation Measure GEO-1, Geotechnical Design, would minimize the potential for the proposed project to result in risks related to unstable geologic and soil units. This impact would be Class II, less than significant with mitigation incorporated.	Mitigation Measure GEO-1 is required.	Class II, less than significant with mitigation incorporated.
Impact GEO-7. The project site soils have a high to critical expansion potential. The proposed project would be constructed in accordance with the requirements of the California Building Code, as well as Mitigation Measure GEO-1 which would minimize the potential for structural hazards associated with expansive soils. This impact would be Class II, less than significant with mitigation incorporated.	Mitigation Measure GEO-1 is required.	Class II, less than significant with mitigation incorporated.
Impact GEO-8. The proposed project would connect to the existing sewer service provided by Goleta West Sanitary District and would not require the use of septic tanks or alternative wastewater disposal systems. No impact would occur.	None required.	No impact.

Impact	Mitigation Measure(s)	Residual Impact
Impact GEO-9. Ground-disturbing activities for the project would occur within geologic units with high or undetermined paleontological sensitivity and, therefore, may significantly impact paleontological resources. With implementation of Mitigation Measure GEO-2, the proposed project's impact to paleontological resources and unique geologic features would be Class II, less than significant with mitigation incorporated.	**GEO-2: Paleontological Resources Mitigation** **Qualified Professional Paleontologist**. Prior to excavation, the project applicant shall retain a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP 2010), who shall direct all mitigation measures related to paleontological resources. Selection of the Qualified Professional Paleontologist shall be subject to review and approval by the City. **Worker Environmental Awareness Program**. Prior to the start of construction, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered. The names of all construction personnel who have received this training shall be recorded and provided to the City upon request. **Paleontological Monitoring and Salvage**. Paleontological monitoring shall be conducted by a paleontological monitor with experience with collection and salvage of paleontological resources and who meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. Paleontological monitoring shall occur during ground-disturbing activities that would disturb previously undisturbed sediments greater than two feet deep (e.g., grading, excavation, drilling of greater than two feet in diameter) throughout the entire project site. Monitoring shall consist of twice-per-week monitoring visits. Based on geological observations or the construction schedule, the Qualified Professional Paleontologist may recommend that monitoring be increased or reduced in frequency or ceased entirely, and such decisions shall be subject to review and approval by the City. In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease, and the Qualified Professional Paleontologist shall evaluate the find. If the fossil(s) is (are) not scientifically significant, then construction activity may resume. If it is determined that the fossils may be scientifically significant, the following shall occur: ▪ **Fossil Salvage**. The fossil shall be salvaged (excavated and collected) to protect it from damage/destruction. Typically, fossils can be safely salvaged quickly by a single paleontological monitor with minimal disruption to construction. Larger fossils may require more extensive salvage operations. After fossil salvage is complete, construction activity within the area may resume. ▪ **Fossil Preparation and Curation**. Fossils shall be identified to the lowest (most-specific) possible taxonomic level, prepared to a curation-ready condition, and curated in a fossil repository per SVP (2010) standards, such as the Santa Barbara Museum of Natural History, along with all pertinent data, photos, and/or maps required by the repository. ▪ **Final Paleontological Mitigation Report**. Upon completion of ground-disturbing activities (or preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a final report describing the paleontological mitigation program's results. The report shall include a summary of the field and laboratory methods employed; an overview of project geology; and, if applicable, an analysis of the recovered fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the City and, if fossil curation occurred, the designated fossil repository. **Plan Requirements and Timing.** The Planning and Environmental Review Director or designee shall approve the Qualified Professional Paleontologist prior to the issuance of a Zoning Clearance for a grading permit. The qualified professional paleontologist shall conduct WEAP training prior to the start of ground-disturbing activities and submit a signed form to the Planning and Environmental Review Director within 24 hours following the completion of WEAP training. The Qualified Professional Paleontologist or designated paleontological resource monitor shall observe grading and drilling activities throughout undistributed construction areas on-site on a twice-per-week monitoring schedule. If a fossil is discovered, the qualified professional paleontologist shall submit the Final Paleontological Mitigation Report to the Planning and Environmental Review Director or designee within 90 days of completion of salvage and preparation. If curation occurred, the qualified professional paleontologist shall also submit the Final Paleontological Mitigation Report to the Santa Barbara Museum of Natural History. **Monitoring.** The Planning and Environmental Review Director or designee shall review and approve the form provided by the qualified professional paleontologist certifying WEAP training was completed. The Planning and Environmental Review Director or designee shall confirm the Qualified Professional Paleontologist or designated paleontological resource monitor observed grading and drilling activities. The Planning and Environmental Review Director or designee shall review and approve the Final Paleontological Mitigation Report, if applicable.	Class II, less than significant with mitigation incorporated.
Cumulative impacts. Cumulative geology and soils impacts would be less than significant. Cumulative impacts to paleontological resources would be potentially significant, but the proposed project's contribution would not be considerable with implementation of Mitigation Measure GEO-2.	None required beyond project-level mitigation measures.	Cumulative impacts to geology and soils would be less than significant. Cumulative impacts to paleontological resources would be potentially significant. The project's contribution would not be considerable.

Impact	Mitigation Measure(s)	Residual Impact
Greenhouse Gases		
Impact GHG-1. The proposed project's construction and operational greenhouse gas emissions would not exceed the threshold of 2.68 metric tons carbon dioxide equivalent per year per resident. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Impact GHG-2. Project construction and operation would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing greenhouse gas emissions, including the 2022 Scoping Plan, 2050 Regional Transportation Plan/Sustainable Communities Strategy, City of Goleta General Plan/Coastal Land Use Plan, and City of Goleta's Climate Action Plan. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Cumulative Impact. The project would not exceed the County of Santa Barbara greenhouse gas thresholds, nor conflict with greenhouse gas reduction plans. Therefore, the project would not have a considerable contribution to cumulative greenhouse gas impacts.	None required.	Cumulative impacts would be potentially significant. The project's contribution would not be considerable.
Hazards and Hazardous Materials		
Impact HAZ-1. Project construction and operation would involve the transportation, use, and disposal of hazardous materials. However, hazardous materials would be typical of those used for construction and in residential developments. All hazardous materials would be transported, used, and disposed of in compliance with existing federal, State, and local regulations. Proposed project impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact HAZ-2. Project demolition and construction could result in the accidental release of hazardous materials. However, implementation of Mitigation Measures HAZ-1 and HAZ-2 would reduce construction phase impacts to Class II, less than significant with mitigation incorporated. Project operation would require minimal hazardous material use, which would occur in accordance with existing federal, State, and local regulations. Operational impacts would be Class III, less than significant.	**HAZ-1: Asbestos-Containing Materials Abatement** Prior to the issuance of Zoning Clearance associated with the demolition permit, the project applicant shall prepare an asbestos abatement plan addressing the items/topics listed below. The asbestos abatement plan shall be reviewed and approved by SBCAPCD. Proof of SBCAPCD approval shall be provided to the City of Goleta's 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, which 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 SBCAPCD ten working days prior to starting demolition as part of the Notification for Renovation and Demolition Form ENF-28 submittal. 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 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 high efficiency particulate air 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 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 of 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. ▪ 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. ▪ 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, obtain SBCAPCD's approval, and contract with an abatement contractor prior to the issuance of Zoning Clearance associated with the demolition permit.	Construction impacts would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant.

Impact	Mitigation Measure(s)	Residual Impact
	Monitoring: The City of Goleta's Director of Planning and Environmental Review, or designee, shall verify SBCAPCD has approved the asbestos abatement plan prior to the issuance of Zoning Clearance. The City of Goleta's Director of Planning and Environmental Review, or designee, shall spot-check compliance with the asbestos abatement plan during demolition activities and verify compliance documentation following the proposed project's demolition activities. **HAZ-2: Lead-Based Paint Abatement** Prior to the issuance of Zoning Clearance associated with the demolition permit, the project applicant shall prepare an LBP abatement plan. This plan can be combined with the plan required in Mitigation Measure HAZ-1. The LBP abatement plan shall be reviewed and approved by the City of Goleta's Planning and Environmental Review Director, or designee. Approval of the LBP abatement plan by the City of Goleta's Planning and Environmental Review Director, or designee, shall be based on the plan's demonstrated compliance with applicable federal, state, and local regulations, including California Department of Public Health and California Division of Occupational Safety and Health requirements. The plan shall clearly identify the use of certified abatement contractors, describe lead-safe work practices (e.g., containment, wet methods, dust suppression), and outline procedures for waste segregation, characterization, and disposal in accordance with hazardous waste thresholds. The plan shall also include site-specific measures to prevent off-site migration of lead dust or debris, and provide documentation of California Department of Public Health notification and contractor qualifications. During proposed project construction and demolition activities, the project applicant shall follow the measures outlined in the LBP abatement plan. 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's Planning and Environmental Review Director. Prior to abatement, the applicant shall notify the California Department of Public Health of lead-based abatement activities through submittal of California Department of Public Health Form 8551, and provide evidence of the notification to the City of Goleta's Planning and Environmental Review Director or designee. Project-specific requirements of the LBP abatement 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. ▪ Pursuant to California Code of Regulations Title 22, Section 66261.24(a)(2)(A), 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 LBP abatement plan, notify the California Department of Public Health, and contract with an abatement contractor prior to the issuance of Zoning Clearance associated with the demolition permit. **Monitoring:** The City of Goleta's Director of Planning and Environmental Review, or designee, shall approve the LBP abatement plan and verify the California Department of Public Health has been notified prior to the issuance of Zoning Clearance. The City of Goleta's Director of Planning and Environmental Review, or designee, shall check the abatement contractor's monitoring log to ensure project-specific recommendations are enacted during proposed project demolition activities.	
Impact HAZ-3. Project construction would involve the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of a school. Following the implementation of Mitigation Measures HAZ-1 and HAZ-2, construction impacts would be Class II, less than significant with mitigation incorporated. Project operations would require minimal hazardous material use within 0.25 mile of a school which would occur in accordance with existing federal, State, and local regulations. Operational impacts would be Class III, less than significant.	Mitigation Measures HAZ-1 and HAZ-2 are required.	Construction impacts would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant.
Impact HAZ-4. The proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. No impact would occur.	None required.	No impact.
Impact HAZ-5. The project site is located outside of the safety contours for the Santa Barbara Airport. The proposed project would not result in a safety hazard or excessive noise related to airport operations for people residing or working in the project area. No impact would occur.	None required.	No impact.

Impact	Mitigation Measure(s)	Residual Impact
Impact HAZ-6. Construction in Cathedral Oaks Road could potentially delay emergency response. Implementation of a Construction Traffic Management Plan would reduce the potential for construction to result in substantial disruption to evacuation on Cathedral Oaks Road during construction. Proposed project operation would not result in impairment or interference with emergency response or evacuation plans. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Impact HAZ-7. The project site is within a High and Very High Fire Hazard Severity Zone. However, the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Construction and operational impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Cumulative Impacts. Cumulative impacts involving hazardous materials and emergency response would be less than significant. Cumulative impacts involving wildland fire would be potentially significant, but the proposed project's contribution would not be considerable.	None required.	Cumulative impacts involving hazardous materials and emergency response would be less than significant. Cumulative impacts involving wildland fire would be potentially significant. The project's contribution would not be considerable.
Hydrology and Water Quality		
Impact HYD-1. Project construction could degrade water quality through increased erosion, risk of spills from construction equipment, and the discharge of sediment. In addition, construction could degrade water quality through introduction of hazardous materials such as asbestos and lead to stormwater runoff. This impact would be Class II, less than significant with mitigation incorporated. Project operation would include stormwater infrastructure that would minimize the amount of sediments and other pollutants discharged during operation. Operational impacts would be Class III, less than significant.	Mitigation Measures HAZ-1 and HAZ-2 are required.	Construction impacts would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant.
Impact HYD-2. The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge due to the high runoff potential of the project site and the absence of on-site groundwater extraction. Operational water demands would be met within existing allocations under the Wright Judgement. Construction and operational impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact HYD-3. The proposed project would not substantially alter the existing drainage pattern of the site or surrounding area in a way that would result in substantial erosion or siltation. Construction would include implementation of a SWPPP and BMPs to control sedimentation, while project operation would include a detention basin and underground detention system that would maintain existing runoff rates and thus maintain the existing rates of erosion from stormwater flows on-site. Construction and operational impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact HYD-4. The proposed project would not substantially alter the existing drainage pattern of the site in a way that would increase on- or off-site flooding compared to existing conditions. Construction would include implementation of a SWPPP and BMPs to manage runoff, while project operation would maintain peak stormwater discharge flows through a detention basin, underground detention system, and on-site storm drain system. Construction and operational impacts related to flooding would be Class III, less than significant.	None required.	Class III, less than significant.
Impact HYD-5. The proposed project could introduce additional sources of polluted runoff during construction due to activities such as hazardous materials handling during demolition. This impact would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant, due to the proposed implementation of stormwater treatment infrastructure.	Mitigation Measures HAZ-1 and HAZ-2 are required.	Construction impacts would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant.
Impact HYD-6. The proposed project would not substantially alter the existing drainage pattern of the site in a way that could impede or redirect flood flows because the project site is not located within a flood hazard zone. No impact would occur.	None required.	No impact.

Impact	Mitigation Measure(s)	Residual Impact
Impact HYD-7. The project site is located outside of a flood hazard zone, tsunami hazard area, dam inundation area, or seiche area. Therefore, the proposed project would not risk release of pollutants due to inundation in these zones. No impact would occur.	None required.	No impact.
Impact HYD-8. Construction of the proposed project could degrade water quality through increased erosion, risk of spills from construction equipment, the discharge of sediment, and introduction of asbestos and lead to stormwater runoff. This could potentially conflict with the Basin Plan. This impact would be Class II, less than significant with mitigation incorporated. Project operation would include stormwater infrastructure that would minimize the amount of sediments pollutants discharged thereby minimizing pollutants in excess of water quality objective quantities identified in the Basin Plan. Operational impacts would be Class III, less than significant.	Mitigation Measures HAZ-1 and HAZ-2 are required.	Construction impacts would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant.
Cumulative Impacts. Cumulative impacts involving sustainable groundwater management would be less than significant. Cumulative impacts to water quality, drainage, and sedimentation would be potentially significant, but with implementation of Mitigation Measures HAZ-1 and BIO-2, the proposed project's contribution would not be considerable.	None required beyond project-level mitigation measures.	Cumulative impacts involving sustainable groundwater management would be less than significant. Cumulative impacts to water quality, drainage, and sedimentation would be potentially significant. The project's contribution would not be considerable.
Land Use and Planning		
Impact LU-1. The proposed project would consist of a subdivision to develop 56 single-family residential lots and three open space parcels on the northern edge of Goleta. The proposed project would not physically divide an established community and would improve local connectivity through the construction of sidewalks and trails through and around the project site. Impacts related to division of an established community would be Class III, less than significant.	None required.	Class III, less than significant.
Impact LU-2. The proposed project would be consistent with the Goleta Municipal Code and City of Goleta Bicycle and Pedestrian Master Plan. However, even with implementation of mitigation, the proposed project would be inconsistent with Goleta General Plan/Coastal Land Use Plan policies CE 1.9 and CE 2.3. This impact would be Class II, less than significant with mitigation.	Mitigation Measures BIO-1 through BIO-8, CUL-1 through CUL-3, GEO-1, GEO-2, HAZ-1, HAZ-2, and NOI-1 are required.	Class II, less than significant with mitigation incorporated.
Cumulative Impacts. Cumulative land use and planning impacts would be less than significant.	None required beyond project-level mitigation measures.	Cumulative impacts would be less than significant.
Noise		
Impact NOI-1. Short-term construction of the proposed project would temporarily increase local noise levels that may exceed Goleta's construction noise standard of 65 dBA. Through implementation of Mitigation Measure NOI-1, impacts would be Class II, less than significant with mitigation incorporated. Project operation would include mechanical equipment that would increase noise levels. However, noise levels generated during project operation would not exceed the City's noise thresholds at the nearest properties. In addition, the project's contribution to traffic noise would not exceed thresholds. Impacts would be Class III, less than significant.	**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 that uses heavy-duty equipment within 450 feet of residences and the golf course (measured from the center of the site) to ensure noise levels do not exceed 65 dBA at nearby sensitive receivers. 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. The Construction Noise Control Plan may include, but would not be limited to, the following to reduce construction noise below the City's 65 dBA construction noise standard. Construction noise control measures may be combined as necessary to demonstrate that such measures would reduce construction noise below the City's noise standard. The construction contractor shall provide proof in the Construction Noise Control Plan that the chosen measures would reduce construction noise below the City's 65 dBA construction noise standard: ▪ Prior to use of any construction equipment, the contractor shall fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds no less effective than as originally equipped by the manufacturer. ▪ Installation of temporary sound barriers/blankets to break the line of sight between construction equipment and sensitive receivers within 450 feet of the project site. The barriers shall 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.	Construction impacts would be Class II, less than significant with mitigation incorporated. Operational impacts would be Class III, less than significant.

Impact	Mitigation Measure(s)	Residual Impact
	▪ Staging and delivery areas shall be located as far as feasible from existing residences and the golf course. 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, either City code enforcement or a contractor-retained and Goleta-approved noise consultant shall conduct noise measurements at the properties that registered the complaint. The noise measurements shall be conducted for a minimum of one hour to determine if noise levels are compliant with City's 65 dBA standard. The consultant shall prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible. **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. **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. Project construction would not result in vibration that exceeds Federal Transit Administration thresholds. Project operation would not involve substantial vibration sources associated with operation. Construction and operational impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact NOI-3. The project site is located outside of the noise contours for the Santa Barbara Airport. The proposed project would not expose people residing or working in the project area to excessive noise levels. No impact would occur.	None required.	No impact.
Cumulative Impacts. Cumulative impacts related to construction vibration would be less than significant. Cumulative impacts related to construction noise and operational traffic noise would be potentially significant, but the proposed project's contribution would not be considerable.	None required beyond project-level mitigation measures.	Cumulative impacts involving construction vibration would be less than significant. Cumulative impacts involving construction noise and operational traffic noise would be potentially significant. The project's contribution would not be considerable.
Transportation and Traffic		
Impact TRA-1. The project would be consistent with applicable City transportation and circulation policies and would include infrastructure to promote bicycle and pedestrian circulation in the project vicinity. Impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact TRA-2. The proposed project would generate vehicle miles traveled exceeding the City and County thresholds. Mitigation Measure TRA-1 would reduce vehicle miles traveled to the extent possible. However, the project would still exceed the City's vehicle miles traveled threshold and this impact would be Class I, Significant and Unavoidable.	**TRA-1 Vehicle Miles Traveled Reduction Plan** The applicant shall prepare and submit a Vehicle Miles Traveled (VMT) Reduction 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 VMT Reduction Plan shall specify the VMT reduction measures to be implemented during project design and development. The measures specified in the VMT Reduction Plan shall be included in development plans and implemented during project development. The VMT Reduction Plan may include, but would not be limited to, the following: ▪ Integrate Affordable and Below Market Rate Housing: Provide 9 percent low-income units (five units), 5 percent moderate-income units, and 5 percent above-moderate (workforce) units for a total of 20 percent income-restricted units. ▪ Provide Pedestrian Network Improvements: Provide a safe path from the project to transit stop, connect pedestrian walkways to existing pedestrian facilities along Glenn Annie Road and Cathedral Oaks Road. ▪ Improve Design of Development: Implement or provide funding for improvements to corridors and crossings for bike networks identified within a 0.5-mile buffer of the project boundary, particularly along Cathedral Oaks Road. ▪ Extend Transit Network Coverage or Hours: Provide a bus stop adjacent to the project site on Cathedral Oaks Road. ▪ Implement School Pool Program: Work with school district(s) to create ridesharing program for school children.	Class I, significant and unavoidable.

Impact	Mitigation Measure(s)	Residual Impact
	Plan Requirements and Timing: The Planning and Environmental Review Director or designee shall approve the VMT Reduction Plan demonstrating incorporation of all feasible VMT reduction strategies/measures into project design prior to issuance of the zoning clearance for the grading permit/demolition permit. The measures specified in the VMT Reduction Plan shall be included in the building and grading plans. **Monitoring:** The City shall monitor compliance with the requirements of the VMT Reduction Plan periodically during construction and following project occupancy and shall promptly investigate and respond to any non-compliance issues.	
Impact TRA-3. In accordance with local regulations and with review by the Santa Barbara County Fire Department, the proposed project would not substantially increase transportation or circulation hazards. Construction and operational impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact TRA-4. In accordance with local regulations and with review by the Santa Barbara County Fire Department, the proposed project would not result in inadequate emergency access. Construction and operational impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Cumulative Impacts. Cumulative impacts related to roadway, bicycle, and pedestrian facilities, transportation hazards, and emergency access would be potentially significant, but the proposed project's contribution would not be considerable. Cumulative impacts related to vehicle miles traveled would be potentially significant, and the proposed project's contribution would be considerable.	None required beyond project-level mitigation measures.	Cumulative impacts related to roadway, bicycle, and pedestrian facilities, transportation hazards, and emergency access would be potentially significant, but the proposed project's contribution would not be considerable. Cumulative impacts related to vehicle miles traveled would be potentially significant, and the proposed project's contribution would be considerable.
Tribal Cultural Resources		
Impact TCR-1. Tribal cultural resources may be encountered during ground disturbance associated with project construction. Following implementation of Mitigation Measures CUL-1 through CUL-3, impacts would be Class II, less than significant with mitigation incorporated.	Mitigation Measures CUL-1 through CUL-3 are required.	Class II, less than significant with mitigation incorporated.
Cumulative Impact. Cumulative impacts to tribal cultural resources would be less than significant.	None required beyond project-level mitigation measures.	Cumulative impacts would be less than significant.
Utilities and Service Systems		
Impact USS-1. The proposed project would not require or necessitate the construction of additional water, wastewater treatment, stormwater drainage, electric power, or telecommunications facilities beyond those evaluated throughout this Environmental Impact Report. Construction and operational impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact USS-2. The proposed project would generate a water demand of approximately 15.1 acre-feet per year. This water demand would be within Goleta Water District SAFE Water Supply allocations, and 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.	Class III, less than significant.
Impact USS-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, impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact USS-4. Demolition and construction activities would generate an estimated 193 tons of nonrecyclable solid waste, which would not exceed the City's construction and demolition solid waste threshold of 350 tons. During operation, the proposed project would generate approximately 69 tons of solid waste per year, which would not exceed the City's threshold of 196 tons per year. Impacts related to solid waste would be Class III, less than significant.	None required.	Class III, less than significant.

Impact	Mitigation Measure(s)	Residual Impact
Cumulative Impacts. Cumulative impacts related to water supply, wastewater treatment, electricity and natural gas infrastructure, and telecommunications facilities would be less than significant. Cumulative impacts related to stormwater infrastructure would be potentially significant, but the proposed project's contribution would not be considerable. Cumulative impacts related to solid waste generation would be potentially significant, and the proposed project's contribution would be adverse, but not considerable.	None required.	Cumulative impacts related to water supply, wastewater treatment, electricity and natural gas infrastructure, and telecommunications facilities would be less than significant. Cumulative impacts related to stormwater infrastructure would be potentially significant, but the proposed project's contribution would not be considerable. Cumulative impacts related to solid waste generation would be potentially significant, and the proposed project's contribution would be adverse, but not considerable.
Wildfire		
Impact W-1. The project site is located on lands classified as a very high FHSZs in an LRA and is near lands classified as a very high FHSZ in an SRA. The proposed project would not substantially impair an adopted emergency evacuation plan or emergency operation plan due to the project location, design, and the existing capacity of Cathedral Oaks Road which is the nearest evacuation route to the project site. Compliance with existing regulations and policies would ensure impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact W-2. The proposed project would be designed in accordance with regulations included in the CFC, CBC, California Residential Code, the City of Goleta General Plan/Coastal Land Use Plan, Municipal Code, and SBCFD Development standards, which would ensure the project would not exacerbate wildfire risks and thereby would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be Class III, less than significant.	None required.	Class III, less than significant.
Impact W-3. The proposed project would require the installation of roads and underground utility connections including those for water and electricity. The undergrounding of utility connections in compliance with existing CBC, CFC, and SBCFD regulations would ensure that installation of this infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. This impact would be Class III, less than significant.	None required.	Class III, less than significant.
Impact W-4. The proposed project is located on lands classified as a very high FHSZ in an LRA and is near lands classified as a very high FHSZ in an SRA. The project would expose people or structures to significant risks, including downslopes or landslides, as a result of post-fire slope instability. Implementation of Mitigation Measure GEO-1 would be required, and this impact would be Class II, less than significant with mitigation incorporated.	Mitigation Measure GEO-1 is required.	Class II, less than significant with mitigation incorporated.
Cumulative Impacts. Cumulative impacts related to risks associated with post-fire slope instability would be less than significant. Cumulative impacts involving emergency evacuation, exposure of occupants to pollutant concentrations for wildfire, uncontrolled spread of a fire, and fire risk associated with the installation of infrastructure would be potentially significant, but the proposed project's contribution would not be considerable.	None required beyond project-level mitigation measures.	Cumulative impacts related to risks associated with post-fire slope instability would be less than significant. Cumulative impacts involving emergency evacuation, exposure of occupants to pollutant concentrations for wildfire, uncontrolled spread of a fire, and fire risk associated with the installation of infrastructure would be potentially significant, but the proposed project's contribution would not be considerable.

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1 Introduction

This document is a Revised Environmental Impact Report (EIR) analyzing the environmental effects of the proposed Shelby Residential Project (hereafter referred to as the "proposed project") at Assessor's Parcel Number (APN) 077-530-019 in Goleta, California. The proposed project would involve demolition of the existing on-site residence and associated structures and the construction of 56 single-family dwellings on the project site. The proposed project is described in detail in Chapter 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 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 and Previous Environmental Review

A combined Notice of Preparation (NOP) for a proposed General Plan Amendment and the proposed project[1] was circulated by the City on July 23, 2012. The public review period for the NOP ended on August 23, 2012. A scoping meeting was held during the public review period on August 8, 2012. A separate NOP for just the proposed project was also filed with the State Clearinghouse for State

[1] The original project in 2012 at the time of the NOP required a General Plan Amendment to change the project site land use designation and zoning from Agriculture to Single Family Residential. The General Plan Amendment is no longer required because the proposed project is a qualified housing development project that utilizes the "Builder's Remedy" protections of the California Housing Accountability Act. Pursuant to the provision of Senate Bill 330, the current proposed project does not require a General Plan Amendment to change the project site land use or zoning from Agriculture to Single Family Residential. Accordingly, comments related to the previously proposed General Plan Amendment are not discussed herein.

agency review on August 7, 2012, and the State agency review period ended on September 9, 2012 (Governor's Office of Land Use and Climate Innovation 2025). The total NOP review period lasted for a period of 48 days between July 23, 2012 and September 9, 2012. A total of 11 comment letters on the proposed project were received in response to the NOP. In addition, 5 verbal comments were provided during the scoping meeting held on August 8, 2012. This Revised Draft EIR has considered all comments received on the proposed project in response to the NOP. [2] Table 1-1 summarizes the comments received on the NOP for the proposed project and where the issues raised in comments are addressed in this Revised Draft EIR.

As discussed in further detail in Chapter 2, *Project Description*, the 2014 Draft EIR was circulated for public review in 2014. Based on public comments on the 2014 Draft EIR, the City chose to revise and recirculate the 2014 Draft EIR. The City released a Revised Draft EIR for public review between October 26, 2015 and December 14, 2015 (herein referred to as 2015 Revised Draft EIR). The proposed project was delayed in part due to a water shortage and water moratorium imposed by the Goleta Water District in September 2014. This Revised Draft EIR has been prepared to reflect changes to the project design, regulations, and existing and cumulative setting that have occurred since 2015.

[2] Pursuant to the provision of Senate Bill 330, the current proposed project does not require a General Plan Amendment to change the project site land use or zoning from Agriculture to Single Family Residential. Because a General Plan amendment is no longer required for the project, this Revised Draft EIR replaces the prior two EIRs in their entirety. Accordingly, NOP comments on the Draft EIR for the General Plan Amendment are not discussed herein.

Table 1-1 Comments Received on the Notice of Preparation and EIR Response

Commenter	Comment	How and Where Comment is Addressed in this EIR
Agency Comments		
Native American Heritage Commission (NAHC)	The commenter cited the NAHC's role as a Trustee Agency under California Public Resources Code §21070 and references multiple state and federal laws requiring consultation with Native American tribes, including CEQA, Government Code §65352.3, and federal laws such as NEPA, NHPA, and NAGPRA.	The agency's role as a Trustee Agency under California Public Resources Code is acknowledged in Section 1.4.
	The commenter emphasized that any substantial adverse change to historical or archaeological resources is considered a significant impact under CEQA, requiring mitigation and analysis within the Area of Potential Effect.	As discussed in Section 4.4, *Cultural Resources*, and Section 4.12, *Tribal Cultural Resources*, the EIR evaluates potential impacts to cultural resources (historical and archaeological) and tribal cultural resources. Mitigation Measures CUL-1 through CUL-3 are included to ensure protection of resources and compliance with CEQA.
	The commenter recommended a Sacred Lands File search and noted that sacred sites are confidential under Government Code §6254(r). Early consultation is advised to avoid inadvertent discoveries.	As discussed in Section 4.12, *Tribal Cultural Resources*, a Sacred Lands File search was requested from the NAHC, and the results were considered in the environmental analysis. These records are not available for the public to review as some of their contents are confidential, but can be provided to qualified individuals upon request.
	The commenter highlighted the importance of tribal consultation and recommended ongoing relationships with tribes to improve the quality of input.	As discussed in Section 4.12, *Tribal Cultural Resources*, the City of Goleta recognizes the importance of tribal consultation. Although Assembly Bill 52 was not applicable to this project due to the NOP being issued prior to July 1, 2015, the City conducted outreach to Native American tribes consistent with NAHC recommendations. Tribal input received during this process informed the analysis and mitigation measures included in the EIR. The City remains committed to meaningful engagement with tribal communities throughout the planning process.
	The commenter recommended avoidance of cultural sites per *CEQA Guidelines* §15370(a) and supported mitigation through documentation and data recovery when avoidance is not feasible.	As discussed in Section 4.12, *Tribal Cultural Resources*, Mitigation Measure CUL-3 includes procedures for inadvertent discovery and treatment of tribal cultural resources. Avoidance is prioritized where feasible, and data recovery protocols are included when necessary.
	The commenter references Public Resources Code Section 5097.98, California Government Code Section 27491, and Health and Safety Code Section 7050.5, which outline the provisions for inadvertent discovery of human remains.	As discussed in Section 4.4, *Cultural Resources*, the provisions of the referenced regulations would be adhered to, in the event that human remains are discovered during project construction.

Commenter	Comment	How and Where Comment is Addressed in this EIR
Santa Barbara County Air Pollution Control District (SBCAPCD)	The commenter stated the EIR Scoping Document (July 19, 2012) determined that air quality and greenhouse gas emissions were effects not found to be significant and therefore were excluded from detailed analysis in the EIR.	The EIR includes a full analysis of air quality in Section 4.2, *Air Quality*, and a full analysis of greenhouse gas emissions in Section 4.6, *Greenhouse Gas Emissions*.
	The commenter recommended the EIR include standard fugitive dust control measures and construction best management practices to minimize air quality impacts.	As discussed in Section 4.2, *Air Quality*, SBCAPCD's standard fugitive dust control measures would be implemented during construction.
	The commenter stated that SBCAPCD Rule 345 establishes limits on visible fugitive dust emissions and includes measures for minimizing dust from on-site activities and truck movement.	As discussed in Section 4.2, *Air Quality*, project construction would comply with SBCAPCD Rule 345, including implementation of dust control practices.
	The commenter stated that fine particulate emissions from diesel equipment exhaust are classified as carcinogenic. They stated contractors must follow the requirements in Attachment B to reduce emissions of ozone precursors and diesel particulates during grading, construction, and hauling.	As discussed in Section 4.2, *Air Quality*, the City would require the use of Tier 4 construction equipment as a condition of approval. Tier 4 engines reduce diesel particulate matter and nitrogen oxides emissions by approximately 90%, consistent with SBCAPCD's Attachment B.
	The commenter stated all portable diesel-fired construction engines rated at 50 brake-horsepower or greater must have either Portable Equipment Registration Program certificates or SBCAPCD permits prior to operation. The commenter mentioned engines with Portable Equipment Registration Program certificates are exempt from SBCAPCD permits if on-site for less than 12 months.	As discussed in Section 4.2, *Air Quality*, the project is subject to applicable state and local air quality regulations, including requirements for portable diesel-fired construction equipment.
	The commenter advised the applicant to determine whether any structures proposed for demolition or renovation contain friable asbestos and, if so, to ensure removal by a certified contractor.	As discussed in Section 4.7, *Hazards and Hazardous Materials*, the EIR acknowledges the potential for asbestos-containing materials (ACMs) in the existing residence, garage, and barn due to their age. To address this, Mitigation Measure HAZ-1 requires preparation of an asbestos abatement plan, including asbestos removal by licensed asbestos abatement contractors.
	The commenter recommended that, prior to occupancy, feasible GHG reduction measures be applied from the following sectors: ▪ Energy use ▪ Transportation ▪ Water conservation ▪ Waste reduction ▪ Architectural features	As discussed in Section 4.6, *Greenhouse Gas Emissions*, the proposed project incorporates multiple feasible GHG reduction measures across the sectors identified by SBCAPCD:

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter suggested compliance with Rule 329, which limits reactive organic compound emissions from cutback and emulsified asphalt materials.	As discussed in Section 4.2, *Air Quality*, the project would comply with SBCAPCD Rule 329 during all asphalt paving activities.
Central Coast Regional Water Quality Control Board	The commenter stated the Draft EIR should include a comprehensive review of cumulative impacts to El Encanto Creek.	Cumulative impacts to El Encanto Creek were considered throughout the EIR where relevant, including in Section 4.3, *Biological Resources*, and Section 4.8, *Hydrology and Water Quality*
	The commenter suggested that the proposed project be evaluated with the Kenwood Village Residential Project under the same Draft EIR.	The proposed project has been evaluated under a project-specific EIR in accordance with *CEQA Guidelines* Section 15161, which provides for the preparation of an EIR that focuses on the specific development project being proposed. While the Kenwood Village Residential Project may share geographic proximity or similar characteristics, each project has distinct environmental settings, design features, and entitlement pathways that warrant independent analysis. However, as stated in Chapter 3, *Related Project*s, the Kenwood Village project is a pending project and was considered in the cumulative impact analysis throughout the EIR.
	The commenter requested justification for increasing density (from 1/40 ac to ~7 du/ac), analysis of the need for this specific project along with a review of alternative development sites.	As discussed in Section 4.9, *Land Use and Planning*, the proposed project is being processed under the Builder's Remedy which permits the proposed project to be evaluated for consistency pursuant to the RS-7 zone. The density of the project would be 3.9 units/net acre, consistent with the maximum dwelling unit density of 5 units/acre in the RS-7 zone.
	The commenter expressed concern about grading to lot lines and recommended preserving natural features to support stormwater infiltration.	As discussed in 4.8, *Hydrology and Water Quality*, the on-site soils have low infiltration feasible, and stormwater infiltration is infeasible. However, the project would comply with all National Pollutant Discharge Elimination System requirements, including the *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region,* which requires implementation of Low Impact Development (LID) Best Management Practices to incorporate and conserve on-site natural features, together with constructed hydrologic controls to more closely mimic pre-development hydrology and watershed processes.
	The commenter requested analysis of grading on steeper slopes at the north end of the lot for erosion potential and runoff volume/velocity.	Grading, erosion, and stormwater runoff are evaluated in Section 4.5, *Geology and Soils*, and Section 4.8, *Hydrology and Water Quality.*
	The commenter requested clear definitions and consistent use of terms such as "riparian corridor," "riparian canopy," and "edge of riparian."	The appropriate and accurate terminology for riparian areas/features is defined and used throughout Section 4.3, *Biological Resources*.

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter requested a detailed analysis of the infeasibility of maintaining the 100-foot Stream Protection Area (SPA) buffer, including economic justification if project economics is the reason for not maintaining the buffer.	As discussed in Section 4.3, *Biological Resources*, the EIR evaluates physical constraints and design alternatives related to SPA buffer feasibility as it relates to General Plan policy consistency. CEQA does not require disclosure of proprietary financial data; feasibility is assessed based on physical and regulatory constraints.
	The commenter recommended buffer averaging to preserve ecological function where full SPA buffers are infeasible.	As discussed in Section 4.3, *Biological Resources*, the project design maximizes setbacks and includes restoration and fencing to protect sensitive areas.
	The commenter requested a complete analysis of the environmental impact of reducing the buffer width to less than 100 feet, as well as analysis of placing detention basins within the SPA buffer and the resulting impacts to riparian habitat and floodplain function.	Section 4.3, *Biological Resource*s includes an evaluation of environmental impacts associated with the buffer reduction, as well as detention basin siting.
	The commenter recommended fuller integration of LID techniques to preserve natural hydrology.	As discussed in Section 4.8, *Hydrology and Water Quality*, the project includes LID features such as bioretention, permeable surfaces, and vegetated swales. These are designed to mimic pre-project hydrology.
	The commenter requested analysis of soil infiltration rates and design modifications to maximize percolation.	As discussed in Section 4.8, *Hydrology and Water Quality*, the on-site soils have low infiltration feasible, and stormwater infiltration is infeasible.
	The commenter requested clarification of the design objectives and treatment capacity of stormwater features.	As discussed in Section 4.8, *Hydrology and Water Quality*, detention basins and bioswales are sized to maintain pre-project runoff rates and treat stormwater consistent with the requirements of the *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region*.
	The commenter recommended maximizing sheet flow across the creek buffer to slow and treat runoff.	As discussed in Section 4.3, *Biological Resources*, and Section 4.8, *Hydrology and Water Quality*, the proposed project would include a setback from El Encanto Creek and vegetated areas that may provide incidental water quality benefits. The proposed detention basin is intended to support riparian health and water quality and would treat flows prior to percolation through soil to El Encanto Creek. While not explicitly designed to maximize sheet flow, the proposed project would comply with applicable City requirements for stormwater management and water quality protection, including General Plan Policy CE 2.5, which encourages the maintenance of creeks as natural drainage systems.
	The commenter stated there were outdated references to the City's Stormwater Management Plan and requests use of current standards.	The most current water quality regulations are discussed in Section 4.8, *Hydrology and Water Quality*.
	The commenter recommended redesigning detention basin outfalls to eliminate the need for rip-rap where basins discharge into El Encanto Creek.	A new storm drain outlet to El Encanto Creek is no longer part of the proposed project; thus, no rip-rap would be placed within El Encanto Creek.

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter requested analysis of whether detention basins could be drained by infiltration and subsurface flow into El Encanto Creek instead of by surface discharge.	As discussed in 4.8, *Hydrology and Water Quality*, the on-site soils have low infiltration feasible, and stormwater infiltration is infeasible.
	The commenter requested analysis of placing outfalls above the ordinary high water mark within El Encanto Creek, including potential for bank erosion and identification of designs that avoid rip-rap.	A new storm drain outlet to El Encanto Creek is no longer part of the proposed project; thus, no rip-rap would be placed within El Encanto Creek.
	The commenter recommended performing wetland delineations within El Encanto Creek and its riparian corridor.	As discussed in Section 4.3, *Biological Resources*, the proposed project would not occur in jurisdictional areas associated with El Encanto Creek. Therefore, a wetland delineation is not required.
	The commenter stated the Draft EIR should include an analysis of the potential for restoration of the riparian corridor and canopy, and should consider the potential for habitat restoration provided by a) a buffer that is 100 feet wide, and b) a buffer with width that varies to optimize restoration and preservation of the riparian corridor.	As discussed in Section 4.3, *Biological Resources*, Mitigation Measure BIO-3 would require on-site restoration for impacts to Environmentally Sensitive Habitat Areas (ESHA) associated with the riparian corridor of El Encanto Creek. The proposed project would not involve temporary or permanent impacts to El Encanto Creek itself.
	The commenter stated the Draft EIR should identify suitable compensatory mitigation measures for project impacts.	As discussed in Section 4.3, *Biological Resources*, the proposed mitigation measures would require compensatory mitigation for impacts to ESHA.
	The commenter recommended that the City and/or project proponents consult with the Central Coast Low Impact Development Initiative for guidance on project design related to LID and stormwater management.	While consultation with non-agency entities is not required under CEQA, the City and project applicant will continue to coordinate with the applicable regulatory agencies to ensure compliance with applicable stormwater management standards and best practices. In addition, the project stormwater design would comply with the *Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region.*
Public Comments		
William and Amaryllis Bridges	The commenter stated their support for redesignating the property to planned residential development but cautioned that a General Plan amendment could risk future approvals of agricultural land conversions without public input.	As discussed in Section 4.9, *Land Use and Planning*, and Chapter 2, *Project Description*, the proposed project is subject to the Builder's Remedy under California Government Code Section 65589.5(d)(5), which allows residential development without requiring a General Plan Amendment. Therefore, a General Plan Amendment is no longer required for the proposed project.
	The commenter requested that environmental review address traffic impacts on Calle Real and recommended an additional access point.	Section 4.11, *Transportation and Circulation*, provides a discussion of potential impacts to traffic on nearby roadways, including Calle Real. The section also analyzes project impacts on circulation and confirms that the project includes two new access points on Cathedral Oaks Road to support safe and efficient traffic flow.

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter stated that two-story units are preferred for neighborhood compatibility.	Section 4.1, *Aesthetics and Visual Resources*, discusses the size and massing of the proposed residences. The buildings would include both single-story and two-story residences, with a maximum height of 24 feet which would be similar to adjacent residential uses.
Mark Lloyd (Applicant Representative)	The commenter stated that the EIR should evaluate the Owner's inclusionary housing obligation, which is proposed to be fulfilled through the donation of residential, garage, and barn structures to Fairview Gardens, along with relocation assistance. They also requested that the EIR consider Affordable and Farmworker Housing policies in this context.	The project includes demolition of the existing on-site residence and associated structures. These structures are currently vacant and do not house farmworkers. The project does not include donation of the structures to Fairview Gardens.
	The commenter stated that the EIR should include discussion of the Owner's obligation to contribute $1.5 million to the City of Goleta for the acquisition of high-priority land for public open space, recreation, or other public benefit purposes.	The owner's financial obligation, as stated by the commenter, is outside the scope of this EIR. The purpose of the EIR is to evaluate physical environmental impacts resulting from the proposed project. This EIR did not identify any significant impacts to recreation that would require mitigation in the form of financial payments to the City.
	The commenter stated that the EIR should address the Owner's offer to dedicate four private open space lots, two along Cathedral Oaks Road and two within the project site for passive recreational use.	As discussed in Chapter 2, *Project Description*, the proposed project includes the use of Lots 57 through 59 for passive recreational use. These lots would include landscaped areas and a community picnic area. The open space lots would integrate with the adjacent riparian corridor and provide neighborhood access to passive recreation.
	The commenter stated that the EIR should evaluate the Owner's provision of public facilities, including the widening of Cathedral Oaks Road, installation of curb, gutter, and pavement, and the construction of a Class I riding and hiking trail.	As discussed in Chapter 2, *Project Description*, the proposed project includes frontage improvements along Cathedral Oaks Road, including road widening, curb and gutter installation, and construction of a Class I multi-use trail.
	The commenter stated that the EIR should review the proposed Landscape Hydrology Plan, which includes features such as stormwater curb extensions, permeable paving, rain barrels, cisterns, bioswales, vegetative swales, and biofiltration areas.	As discussed in Chapter 2, *Project Description*, the proposed project includes a landscaping plan with features such as permeable paving, bioswales, vegetative swales, rain barrels, and detention systems.
	The commenter stated that the EIR should consider the Owner's commitment to green building design and operation, with the intent to exceed State and City green building requirements.	As discussed in Chapter 2, *Project Description,* the applicant is proposing that the residential units be designed with sustainable elements consistent with current City and California Building Code requirements, including the installation of Energy Star appliances and installation of low-flow plumbing fixtures. The proposed design of the residences would include solar photovoltaic systems pursuant to the requirements of California Building Code Title 24, Part 6.

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter stated that the EIR should evaluate the inclusion of "affordable-by-design" homes as workforce housing units that contribute to meeting the City's Regional Housing Needs Allocation obligations.	As discussed in Chapter 2, *Project Description*, the project objectives include the provision of housing opportunities for extremely low income, lower income, and moderate income- level persons to support the City in complying with its Regional Housing Needs Allocation requirements.
	The commenter requested that the EIR include the acreage and condition of the former avocado orchard. The commenter stated that only a few trees remain and that the site has been fallow for decades. The commenter also suggested discussing factors contributing to the lack of production, such as poor soil drainage, urban conflicts, and infeasibility of aerial spraying.	As discussed in Chapter 2, *Project Description*, the project site was occupied by an avocado orchard until the mid-1990s but has been fallow since approximately 1995. The site currently contains a few remnant avocado trees, but is primarily a large fallow field used for woodchip and firewood storage.
	The commenter requested that the EIR include all improved physical features and current uses on the property in the Environmental Setting.	As discussed in Chapter 2, *Project Description*, the EIR describes the existing conditions on the project site, including the single-family residence, garage, barn, driveway, and the ongoing wood splitting and storage use. These features are acknowledged as part of the baseline conditions for environmental analysis.
	The commenter requested that the EIR clarify the extent of the SPA buffer on the Shelby property, noting that the buffer does not uniformly extend 100 feet onto the property and instead varies from approximately 1 foot to 85 feet.	As discussed in Chapter 2, *Project Descriptio*n, the EIR identifies specific SPA buffer encroachments by lot and square footage.
	The commenter requested that the EIR acknowledge that the creek side of the Shelby property is dominated by non-native vegetation such as eucalyptus and olive trees, and that within the 1–85 foot SPA buffer on the Shelby side, there are mostly non-native grasses and an existing driveway, which for approximately 70 feet is less than 20 feet from the western property line.	Chapter 2, *Project Description*, and Section 4.3, *Biological Resources*, discusses the presence of non-native vegetation, including eucalyptus and olive trees and ornamental grasses, within the SPA buffer. The existing driveway and associated proximity to the property line are also noted as part of baseline conditions.
	The commenter requested that the EIR acknowledge the minor extent of proposed encroachment into the SPA buffer, noting that the existing driveway is closer to the riparian corridor than the proposed road segment. The commenter also stated that Lot 1's southwest corner is less than 50 feet within the buffer, with the proposed house located at the edge of the buffer on the existing driveway, and Lot 2 includes only about 120 square feet of encroachment while its proposed house is outside the buffer. The commenter further noted that the creek side of these lots contains non-native olive and eucalyptus trees.	As discussed in Chapter 2, *Project Descriptio*n, the EIR identifies specific SPA buffer encroachments by lot and square footage, including Lots 1 and 2.

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter requested that the EIR analyze and include all permitted and conditionally permitted uses under Section 35-217, AG-II, of the City of Goleta Zoning Ordinance as part of the No Project Alternative. The commenter noted these uses include agriculture, animal raising, sale of agricultural products, greenhouses, animal hospitals, and riding stables. The commenter also stated that any discussion of historic use should focus on the area north of Cathedral Oaks Road after construction of the roadway connector in 2000, and that a realistic No Project Alternative needs to be analyzed.	As discussed in Chapter 6, *Alternatives*, the EIR evaluates three alternatives: (1) No Build, which assumes the site remains in its existing condition, (2) By-Right Development, which assumes development consistent with AG-II zoning, and (3) Mixed-Use Development, which assumes medium density residential housing along with a neighborhood market, workspace, and daycare. Alternative 2 includes uses permitted under Section 35-217 of the Goleta Municipal Code, such as greenhouses (up to 20,000 square feet), one single-family residence, farmworker housing, and agricultural operations. The analysis reflects that the site has been fallow since the mid-1990s and acknowledges the construction of Cathedral Oaks Road in 2000.
	The commenter requested that Alternative #1 in the EIR identify the minor extent of SPA buffer encroachment associated with the proposed project. The commenter emphasized that the proposed project improves existing conditions and that reducing project intensity would limit funding and community benefits under the Development Agreement.	As discussed in Chapter 6, *Alternatives*, the EIR evaluates three alternatives: (1) No Build, which assumes the site remains in its existing condition, (2) By-Right Development, which assumes development consistent with AG-II zoning, and (3) Mixed-Use Development, which assumes medium density residential housing along with a neighborhood market, workspace, and daycare.
	The commenter requested a third alternative that utilizes a revised subdivision lot layout with 65 foot lot frontages, rather than dropping the 46 lots that currently don't conform to the R-1 zone frontage requirement.	As discussed in Chapter 6, *Alternatives*, the EIR evaluates three alternatives, including a Mixed-Use Development Alternative which would have a different layout than the proposed project.
	The commenter requested that the EIR evaluate all applicable Visual Policies, standards, and practices in Chapter 6 of the City's General Plan/Coastal Land Use Plan.	A discussion of the proposed project's consistency with General Plan/Coastal Land Use Plan policies related to aesthetics are addressed in Section 4.1, *Aesthetics and Visual Resources*, and Section 4.9, *Land Use and Planning*.
	The commenter requested that the EIR revise the environmental setting to accurately reflect the size and condition of the former avocado orchard, noting that the area is approximately two acres with only a few remaining trees. The commenter also requested that the Local Scenic Corridor analysis include specific view evaluations from the "Scenic Views to be Protected" in Figure 6-1 of the Visual and Historic Resources Element, focusing on view orientations near Cathedral Oaks Road at Alameda Avenue and Brandon Drive.	AS discussed in Chapter 2, *Project Description*, the project site was occupied by an avocado orchard until the mid-1990s but has been fallow since approximately 1995. The site currently contains only a few remnant avocado trees and is primarily a large fallow field used for woodchip and firewood storage. The proposed project's potential impacts related to scenic vistas visible from existing public views, including Cathedral Oaks Road, are analyzed in Section 4.1, *Aesthetics and Visual Resources*.

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter requested that the EIR use objective language and avoid unnecessary modifiers or subjective terms in describing project impacts, they included specific examples from the Aesthetics and Visual Resources and Biological Resources sections.	This EIR was prepared to use objective language throughout the document.
	The commenter requested that the EIR preparer review photo documentation, visual simulations, and drive-through models provided by the Shelby applicants.	Section 4.1, *Aesthetics and Visual Resources*, includes visual simulations. These materials are included as Figures 4.1-1 through 4.1-6.
	The commenter requested that the EIR peer review and incorporate the applicant's Concept Hydrology and Hydraulic Report and Landscape Hydrology Report, which outline stormwater management features such as porous pavement, bioswales, detention basins, permeable paving, rain barrels, and biofiltration areas.	The applicant's Conceptual Hydrology and Hydraulic Study is incorporated as Appendix H of this EIR.
Larry Scarpacci	The commenter asserted that the proposed projects violate General Plan Policy CE 11.2 and emphasizes that the General Plan should only be amended when absolutely necessary.	As discussed in Section 4.9, *Land Use and Planning*, and Chapter 2, *Project Description*, the proposed project is subject to the Builder's Remedy under California Government Code Section 65589.5(d)(5), which allows residential development without requiring a General Plan Amendment. Therefore, a General Plan Amendment is no longer required for the proposed project. As discussed in Section 4.0.3.1, *Agricultural and Forestry Resources*, the project site is no longer used for agricultural purposes and is not designated as Farmland. Therefore, Policy CE 11.2 is not applicable to the project, because the proposed project would not convert agricultural lands to a non-agricultural use.
	The commenter expressed concerns that the projects would increase air pollution in the neighborhood.	Potential impacts related to air pollution are evaluated in Section 4.2, *Air Quality*.
	The commenter is concerned that the projects will worsen traffic congestion, particularly affecting commutes for Dos Pueblos High School staff and students.	As described in Section 4.11, *Transportation and Circulation,* as of 2018, the Governor's Office of Land Use and Climate Innovation identified vehicle miles traveled rather than traffic congestion as the most appropriate measure of transportation impacts. Therefore, the EIR does not include a detailed analysis of traffic congestion as such analysis is not required by CEQA. However, Appendix J includes an evaluation of traffic congestion with the proposed project.
	The commenter is concerned that the projects will strain local infrastructure and water supply.	Potential impacts related to utility infrastructure and water supply are discussed in Section 4.13, *Utilities and Service Systems*.
	The commenter described both proposed subdivisions as "overly ambitious" and recommended they be reduced in size to avoid negative impacts on community's quality of life.	Since public circulation of the NOP in 2012, the number of residential units has been reduced from 60 to 56.

Commenter	Comment	How and Where Comment is Addressed in this EIR
Frank and Shirley	The commenter expressed concerns with amending the General Plan, stating it would be "weakened and destroy the vision for our valley".	As discussed in Section 4.9, *Land Use and Planning*, and Chapter 2, *Project Description*, the proposed project is subject to the Builder's Remedy under California Government Code Section 65589.5(d)(5), which allows residential development without requiring a General Plan Amendment. Therefore, a General Plan Amendment is no longer required for the proposed project.
	The commenter raised concerns stating water scarcity.	Potential impacts on water supply are discussed in Section 4.13, *Utilities and Service Systems*.
	The commenter expressed concerns regarding increased traffic on Calle Real and Tuolumne Drive, overflow parking, and congestion from new residents and guests.	The EIR does not include a detailed analysis of traffic congestion or parking as such analysis is not required by CEQA. However, Appendix J includes an evaluation of traffic congestion with the proposed project. In addition, each proposed residential unit would include multi-space garage and driveway parking.
	The commenter suggested filling empty homes in Goleta opposed to building new ones.	The proposed project would assist in providing housing within Goleta.
	The commenter is concerned about loss of privacy and ocean views due to two-story homes adjacent to existing residences.	Potential impacts related to scenic views and vistas are discussed in Section 4.1, *Aesthetics and Visual Resources*. The project would not block ocean views.
	The commenter notes the presence of White-Tailed Kites and the need to preserve open space for raptor habitat.	Potential impacts to raptors are discussed in Section 4.3, *Biological Resources*.
	The commenter raised concerns over rezoning the project site from agriculture to residential.	As discussed in Section 4.9, *Land Use and Planning*, and Chapter 2, *Project Description*, the proposed project is subject to the Builder's Remedy under California Government Code Section 65589.5(d)(5), which allows residential development without requiring a zone change. The project site is designated Agriculture in the City of Goleta General Plan but has been fallow since approximately 1995 and is not actively used for agricultural production. Potential impacts related to agricultural conversion are discussed in Section 4.0.3.1, *Agriculture and Forestry Resources*, of Chapter 4, *Environmental Impact Analysis*.
Maggie and David Friedlander	The commenter raised concerns over rezoning the project site from agriculture to residential and the precedent this sets for future loss of open space.	As discussed in Section 4.9, *Land Use and Planning*, and Chapter 2, *Project Description*, the proposed project is subject to the Builder's Remedy under California Government Code Section 65589.5(d)(5), which allows residential development without requiring a zone change. The project site is designated Agriculture in the City of Goleta General Plan but has been fallow since approximately 1995 and is not actively used for agricultural production. Potential impacts related to agricultural conversion are discussed in Section 4.0.3.1, *Agriculture and Forestry Resources*, of Chapter 4, *Environmental Impact Analysis*,

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter raised concerns about increased traffic from the project, congestion at the Glen Annie interchange, lack of traffic signals on Calle Real, and emergency evacuation risks.	Potential impacts related to roadway safety and emergency evacuation are discussed in Section 4.11, *Transportation and Circulation*. As described in Section 4.11, *Transportation and Circulation,* as of 2018, the Governor's Office of Land Use and Climate Innovation identified vehicle miles traveled rather than traffic congestion as the most appropriate measure of transportation impacts. Therefore, the EIR does not include a detailed analysis of traffic congestion as such analysis is not required by CEQA. However, Appendix J includes an evaluation of traffic congestion with the proposed project.
	The commenter raised concerns that the number and type of units would strain utilities, especially water, and increase noise pollution, air pollution, water pollution, and smog from traffic.	Potential impacts related to utilities, noise, air pollution, water pollution, and transportation are discussed in Section 4.13, *Utilities and Service Systems,* Section 4.10, *Noise*, Section 4.2, *Air Quality*, Section 4.8, *Hydrology and Water Quality*, and Section 4.11, *Transportation and Circulation*, respectively.
Harry S. Rouse	The commenter expressed concerns with amending the General Plan, stating it would create a precedent which would allow developers to develop Goleta's remaining open spaces.	As discussed in Section 4.9, *Land Use and Planning*, and Chapter 2, *Project Description*, the proposed project is subject to the Builder's Remedy under California Government Code Section 65589.5(d)(5), which allows residential development without requiring a General Plan Amendment. Therefore, a General Plan Amendment is no longer required for the proposed project.
	The commenter stated their general opposition of the Shelby project, and other subdivisions proposed in 2012 in Goleta. They state Goleta has already become overdeveloped and overcrowded.	This comment does not pertain to specifics within the EIR. The commenters' opposition to the project is acknowledged.
	The commenter expressed concerns about cumulative traffic impacts, due to the proposed project as well as other subdivision in Goleta; including increased congestion on Cathedral Oaks Road and Calle Real, especially during rush hours, and requested updated traffic counts.	As described in Section 4.11, *Transportation and Circulation,* as of 2018, the Governor's Office of Land Use and Climate Innovation identified vehicle miles traveled rather than traffic congestion as the most appropriate measure of transportation impacts. Therefore, the EIR does not include a detailed analysis of traffic congestion as such analysis is not required by CEQA. However, Appendix J includes an evaluation of traffic congestion with the proposed project.
	The commenter expressed concerns about increased pollution from heavy construction equipment and added vehicle traffic due to the proposed project and other proposed subdivisions in Goleta.	Potential impacts related to air pollution are discussed in Section 4.2, *Air Quality*.
	The commenter stated concerns about the loss of irreplaceable agricultural lands, stating they could be protected through a ballot initiative.	As discussed in Section 4.9, *Land Use and Planning*, the project site is designated Agriculture in the City of Goleta General Plan but has been fallow since approximately 1995 and is not actively used for agricultural production.

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter stated concerns about potential reductions in public safety as the ratio of residents to police and fire headcount would increase due to the proposed project and other proposed subdivisions in Goleta.	The proposed project's impacts on fire protection and police protection services are discussed in Section 4.0.3.5, *Public Services*, of Chapter 4, *Environmental Impact Analysis*.
	The commenter stated concerns about additional demands water resources due to the proposed project and other proposed subdivisions in Goleta.	Potential impacts related to water use are discussed in Section 4.13, *Utilities and Service Systems*.
	The commenter expressed concerns about the increased demand on waste water and solid waste disposal services due to the proposed project and other proposed subdivisions in Goleta.	Potential impacts related to wastewater and solid waste disposal are discussed in Section 4.13, *Utilities and Service Systems*.
Ingeborg Cox	The commenter expressed concerns of residential development within 500 feet of U.S. 101 in Goleta.	The project site is located over 3,400 feet away from U.S. 101. The project does not propose residences within 500 feet of U.S. 101.
	The commenter states that air quality impacts from incompatible land uses can contribute to increased risk of illness, missed work and school, a lower quality of life and higher costs for public health and pollution control.	Potential impacts related to air quality are discussed in Section 4.2, *Air Quality*.
	The commenter questioned the accuracy of the traffic study results, particularly the reported Level of Service for the northbound US 101 ramp during peak hours, and expressed concern that traffic counts may not reflect actual conditions when school is in session.	As described in Section 4.11, *Transportation and Circulation,* as of 2018, the Governor's Office of Land Use and Climate Innovation identified vehicle miles traveled rather than traffic congestion as the most appropriate measure of transportation impacts. Therefore, the EIR does not include a detailed analysis of traffic congestion as such analysis is not required by CEQA. However, Appendix J includes an evaluation of traffic congestion with the proposed project.
	The commenter stated that fire protection in the area is inadequate and suggests that no further development occur until a new fire station is constructed.	The proposed project's impact on fire protection services is discussed in Section 4.0.3.5, *Public Services*, of Chapter 4, *Environmental Impact Analysis*. As described therein, the proposed project itself does not necessitate construction of Fire Station 10; rather, 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 adequate service in Goleta.
	The commenter expressed concern about potential archaeological and tribal cultural impacts, including adequacy of site surveys, depth of testing, consultation with Native American groups, and transparency regarding tribal contacts.	Potential impacts related to archaeological resources and tribal cultural impacts are evaluated in Section 4.4, *Cultural Resources*, and Section 4.12, *Tribal Cultural Resources*, respectively.

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter opposed the conversion of agricultural land designated as Prime or Unique Farmland, they stated that such land is irreplaceable and economically beneficial to local governments.	As described in Section 4.0.3.1, *Agriculture and Forestry Resources*, of Chapter 4, *Environmental Impact Analysis*, the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.
	The commenter stated that El Encanto Creek is mapped as an Environmentally Sensitive Habitat Area and expressed concern that project runoff could introduce pollutants into the creek and downstream waters, affecting wildlife.	Potential effects to ESHA are disclosed in Section 4.3, *Biological Resources*, including the potential effects of the proposed project to El Encanto Creek ESHA.
	The commenter stated that the parking spaces summary incorrectly calculated visitor parking requirements and asserted that the project does not provide excess parking.	The EIR does not include a detailed parking analysis or specify parking space counts as such analysis is not required by CEQA. However, each proposed residential unit would include multi-space garage and driveway parking.
	The commenter expressed concern that a major earthquake could isolate Goleta by damaging US 101, and stated that agricultural land should be preserved to maintain the City's identity as "The Good Land."	Impacts related to earthquakes are addressed in Section 4.5, *Geology and Soils*. However, impacts of a future earthquake to U.S. 101 are not in the purview of the proposed project and are not addressed in the EIR. As discussed in Section 4.9, *Land Use and Planning*, the project site is designated Agriculture in the City of Goleta General Plan but has been fallow since approximately 1995 and is not actively used for agricultural production. No agricultural operations would be displaced by the proposed project.
	The commenter expressed concerns with amending the General Plan.	As discussed in Section 4.9, *Land Use and Planning*, and Chapter 2, *Project Description*, the proposed project is subject to the Builder's Remedy under California Government Code Section 65589.5(d)(5), which allows residential development without requiring a General Plan Amendment. Therefore, a General Plan Amendment is no longer required for the proposed project.
Scoping Meeting Comments		
Karen Lovalace	The commenter expressed concern about substantial grading activity on the upper portion of the Shelby Ranch property and suggested this should be evaluated.	Potential impacts associated with physical disturbance of the project site for grading to prepare the site for development are evaluated throughout the EIR as it relates to each particular environmental issue area, including in Section 4.5, *Geology and Soils*.
	The commenter requested that the EIR consider all environmental impacts associated with development, including air quality, geology, land use, planning, population, and public services.	These topics are addressed in Section 4.2, *Air Quality*, Section 4.5, *Geology and Soils,* Section 4.9, *Land Use and Planning*, Section 4.0.3.4, *Population and Housing,* and Section 4.0.3.5, *Public Services*.

Commenter	Comment	How and Where Comment is Addressed in this EIR
	The commenter stated that the property is viable for agriculture and should remain designated for agricultural use.	As discussed in Section 4.0.3.1, *Agriculture and Forestry Resources*, Section 4.9, *Land Use and Planning,* and Chapter 2, *Project Description*, the project site land use designation is agricultural, but the site is not designated as Farmland or currently used for agriculture. The proposed project is subject to the Builder's Remedy under California Government Code Section 65589.5(d)(5), which allows residential development without requiring a General Plan Amendment or rezoning.
Earl Lovelace	The commenter expressed concern that the Shelby Ranch Project appears too dense.	As discussed in Section 4.9, *Land Use and Planning,* the proposed project includes 56 residential units on 14.38 net acres, resulting in a density of approximately 3.9 units per acre, which is consistent with the RS-7 zone and the Single-Family Residential Use Category.
	The commenter stated there is existing traffic congestion at the U.S. 101/Glen Annie intersection and along Cathedral Oaks Road during school hours.	As described in Section 4.11, *Transportation and Circulation,* as of 2018, the Governor's Office of Land Use and Climate Innovation identified vehicle miles traveled rather than traffic congestion as the most appropriate measure of transportation impacts. Therefore, the EIR does not include a detailed analysis of traffic congestion as such analysis is not required by CEQA. However, Appendix J includes an evaluation of traffic congestion with the proposed project.
Richard Foster	The commenter suggested it may be best to leave the property as-is, noted that the site is not currently surrounded by residential development.	Chapter 2, *Project Description*, describes the land uses surrounding the project site, including multi-family residential development to the west; and Cathedral Oaks Road and single-family residences to the south.
	The commenter raised concerns about traffic impacts from residents driving to off-site services, and expressed skepticism about claims that the land is no longer viable for agriculture.	Section 4.11, *Transportation and Circulation*, describes the proposed project's potential impacts related to vehicle miles traveled. As described in Section 4.11, *Transportation and Circulation,* as of 2018, the Governor's Office of Land Use and Climate Innovation identified vehicle miles traveled rather than traffic congestion as the most appropriate measure of transportation impacts. Therefore, the EIR does not include a detailed analysis of traffic congestion as such analysis is not required by CEQA. However, Appendix J includes an evaluation of traffic congestion with the proposed project. As discussed in Section 4.0.3.1, *Agriculture and Forestry Resources*, Section 4.9, *Land Use and Planning,* and Chapter 2, *Project Description*, the project site land use designation is agricultural, but the site is not designated as Farmland or currently used for agriculture.

Commenter	Comment	How and Where Comment is Addressed in this EIR
Mark Lloyd	The commenter states access for the project is designed to meet public residential street standards.	The proposed project's impacts related to project site accessed are discussed in Section 4.11, *Transportation and Circulation.* The proposed project's impacts related to conformance with applicable City design standards is discussed in Section 4.9, *Land Use and Planning*.
	The commenter states information is available regarding dirt fill on-site.	The condition of the existing on-site soils were considered throughout the EIR. Section 4.5, *Geology and Soils*, discussed the proposed project's potential to result in substantial soil erosion.
	The commenter states the project density coincides with the standards of single-family residential zoning in Goleta.	The proposed project's conformance with applicable City design standards is discussed in Section 4.9, *Land Use and Planning*. As discussed therein, the proposed project includes 56 residential units on 14.38 net acres, resulting in a density of approximately 3.9 units per acre, which is consistent with the RS-7 zone and the Single-Family Residential Use Category.
Chip Wullbrandt (Applicant Representative)	The commenter stated that the Development Agreement should be considered in the project-specific analysis and noted that while the existing buildings are not historically significant, the applicant proposes to relocate them to a permanently protected agricultural property.	As discussed in Chapter 2, *Project Description*, the proposed project includes a Development Agreement between the applicant and the City. As described therein, the proposed project does not include relocation of on-site structures.

1.3 Structure of Environmental Impact Report

The *Executive Summary* at the beginning of this Revised Draft EIR summarizes the project description and conclusions of the impact analyses provided in this Revised Draft EIR. Chapter 1, *Introduction,* summarizes the history of the project, provides responses to previous NOP comments, identifies applicable agencies, and provides an overview of the environmental review process for this Revised Draft EIR. Chapter 2, *Project Description*, provides a detailed description of the proposed project evaluated in this Revised Draft EIR. Chapter 3, *Related Projects*, includes an updated list of pending and approved projects in the vicinity of the project site; this list was used, where applicable, in the environmental issue area evaluations of cumulative impacts.

Chapter 4, *Environmental Impact Analysis*, addresses each of the issue areas that were identified for further discussion during or after the scoping period. This Revised Draft EIR analyzes 14 environmental resource areas determined to be potentially significant, which include:

- Aesthetics and Visual Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Transportation and Circulation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Resource areas eliminated from further analysis because they would not have significant impacts are discussed in Section 4.0.3, *Resource Areas Eliminated from Further Analysis*, and include: Agricultural and Forestry Resources, Energy, Mineral Resources, Population and Housing, Public Services, and Recreation.

Pertinent City policies and guidelines and other background documents were used during preparation of this Revised Draft EIR. A full reference list is contained in Chapter 7, *References*.

Chapter 6, *Alternatives*, was prepared in accordance with *CEQA Guidelines* Section 15126.6 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.

1.4 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. This Revised Draft EIR will be submitted to responsible agencies for review and comment, which include:

- The State Water Resources Control Board, which regulates water quality in the region and would consider the requirement and coverage under 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);
- The Central Coast Regional Water Quality Control Board, which regulates water quality in the region and would consider the requirement and issuance of a Clean Water Act Section 401 Water Quality Certification;
- California Department of Fish and Wildlife, which would consider the requirement and issuance of a Lake and Streambed Alteration Agreement;
- Goleta West Sanitary District, which would consider the approval of a request to serve the project site;
- Goleta Water District, which would consider the issuance of a Can and Will Serve Letter; and
- The Santa Barbara County Fire Department, which would review and consider approval the project site plans.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. The Native American Heritage Commission is a trustee agency for the proposed project.

1.5 Environmental Review Process

The environmental impact review process for the proposed project, as required under CEQA, is summarized herein. This Revised Draft EIR is being recirculated in accordance with *CEQA Guidelines* Section 15088.5, which states that a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review. This Revised Draft EIR is being recirculated to address changes to the proposed project and address additional discussion and analysis of topics, including transportation impacts from vehicles miles traveled, energy demand, tribal cultural resources, and wildfire risk, which were added to the *CEQA Guidelines* after the 2015 Revised Draft EIR was published. The following steps of the CEQA process have already been completed:

1. **Notice of Preparation 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.** A 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. The 2014 Draft EIR for the proposed project was circulated for public review in 2014.
3. **Revised Draft EIRs.** Based on public comments provided on the 2014 Draft EIR for the proposed project, the City chose to revise and recirculate the 2014 Draft EIR. The City released the 2015 Revised Draft EIR for public review between October 26, 2015 and December 14, 2015. This Revised Draft EIR has been prepared to reflect changes to the project design, regulations, and existing and cumulative setting that have occurred since 2015.

Following preparation of this Revised Draft EIR, the following steps must be completed pursuant to CEQA.

1. **Notice of Completion/Notice of Availability.** The lead agency must file a Notice of Completion with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR, included Revised Draft EIRs. The lead agency must place the Notice of Availability in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the Notice of Availability 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). Comments received on the prior Revised Draft Project EIR are part of the administrative record, although written responses to those comments are not required because the entire Revised Draft Project EIR is being revised and recirculated a second time. Thus, pursuant to *CEQA Guidelines* section 15088.5(f)(3), new comments on this Revised Draft EIR must be submitted.
2. **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.
3. **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).
4. **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).
5. **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

6. **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.
7. **Notice of Determination.** The lead agency must file a Notice of Determination after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the Notice of Determination with the County Clerk and submit it to the State Clearinghouse. The Notice of Determination must be posted for 30 days and sent to anyone previously requesting notice. Posting of the Notice of Determination starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

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2 Project Description

2.1 Introduction

On October 11, 2005, the project applicant submitted an application to the City of Goleta for the Shelby Residential Project (herein referred to as "proposed project") which included the development of 64 residential lots and 60 single-family residences on a 14.38-net acre property located at 7400 Cathedral Oaks Road (herein referred to as "project site") in the northwestern portion of the City (Figure 2-1). In 2011, the City determined that the application for the proposed project was completed, prior to the enactment of the 2012 Goleta Agricultural Land Protection Initiative (Measure G), requiring the Project to move forward under the City's development review process in effect prior to Measure G.

On August 7, 2012, the City released a Notice of Preparation of a Draft Environmental Impact Report (EIR) for the proposed project. The City released two Draft EIRs for public review in 2014. The first was a Supplemental Draft EIR to the Certified Environmental Impact Report for the General Plan/Coastal Land Use Plan (State Clearinghouse No. 2012071071) that analyzed the impacts of a General Plan amendment required for the proposed project. The second was a Draft EIR (State Clearinghouse No. 2012081019) that analyzed the project-level impacts of development of the proposed project (herein referred to as the 2014 Shelby Residential Project Draft EIR). Based on public comments provided on both Draft EIRs, the City chose to revise both EIRs. The City released the Revised Draft Supplemental EIR for the General Plan Amendment (State Clearinghouse No. 2012071071) and the 2015 Revised Draft EIR (State Clearinghouse No. 2012081019) for public review between October 26, 2015 and December 14, 2015.

The proposed project was delayed in part due to a Stage II Water Shortage Emergency and water moratorium imposed by the Goleta Water District in September 2014, pursuant to the SAFE Water Supplies Ordinance, which prohibits Goleta Water District from releasing potable water to new or additional service connections unless specific conditions related to water supply are met.

In March 2023, the project applicant submitted a Senate Bill (SB) 330 application[1] to revise the proposed project, reducing the number of residential units from 60 to 56 and designating 20 percent of the proposed residential units as deed-restricted units for specific household incomes for 55 years. Because a General Plan amendment is no longer required for the project,[2] this Revised Draft EIR replaces the prior two EIRs in their entirety. This Revised Draft EIR reflects changes to the project

[1] SB 330, established under California's Housing Crisis Act of 2019, is a preliminary application process designed to streamline application processing for residential developments in jurisdictions facing housing shortages. By submitting a completed SB 330 application, a developer ensures their project is subject to the local zoning and policies in effect at the time of SB 330 application submission.

[2] The project applicant submitted the SB 330 preliminary application for the proposed project at a time the City did not yet have a certified Housing Element. The City disputed the applicant's submission of an SB 330 preliminary application for a pending project and in December 2023, returned the preliminary application to the project applicant. In January 2024, the project applicant filed a petition for writ of mandate in Santa Barbara County Superior Court, challenging the City's return of the SB 330 preliminary application. (*Shelby Family Partnership LP v. City of Goleta*, Case No. 24CV00548). After briefing and a hearing on the merits, the court ruled in the applicant's favor, ruling that the proposed project is subject to the Builder's Remedy and the protections of the Housing Accountability Act. To avoid the risk and costs of further litigation, the City and project applicant negotiated a mutually beneficial settlement agreement, which included among other things, that the proposed project would be processed consistent with state and local law, including environmental review pursuant to CEQA. Under the settlement agreement, and in accordance with Assembly Bill (AB 1893), the proposed project will set aside 11 of the 56 single-family homes (i.e., 19.6% of the total units) as deed restricted affordable as follows: (i) four units (7.1%) for extremely low income households; (ii) one unit (1.8% for lower income households; (iii) three units (5.4%) for moderate income households; and (iv) three units (5.4% for above moderate income households earning between 120 – 200% of area median income. (See Gov. Code, 65589.5(f)(6)-(7), (h)(3)(A)-(C).) In light of this, the proposed project no longer requires a General Plan Amendment to change the project site land use designation or zoning from Agriculture to Single Family Residential.

design, updated CEQA Guidelines and thresholds (updated in 2018), updates to the Santa Barbara County *Environmental Thresholds and Guidelines Manual* (updated in 2024), as well as changes to the project-level environmental and cumulative setting in the vicinity of the project site. As a result of these changes, additional discussion and analysis of topics, including transportation impacts from vehicles miles traveled, energy demand, tribal cultural resources, and wildfire risk, are added to this EIR. In addition, an updated site survey and records search were conducted to confirm existing conditions, including the presence of biological resources, cultural resources, and hazardous materials on the project site.

2.2 Location and Existing Setting

The project site refers to and encompasses the approximately 14.38 net acres currently designated as Assessor's Parcel Number (APN) 077-530-019 (Figure 2-2). The project site is surrounded by the Glen Annie Golf Course to the north and east; El Canto Creek, Northgate Road, and multi-family residential development to the west; and Cathedral Oaks Road and single-family residences to the south. Dos Pueblos Senior High School is approximately 1,500 feet to the southeast of the project site at Cathedral Oaks Road and Alameda Avenue. South Coast Montessori School is located approximately 1,000 feet south of the project site at Mirano Drive. The Evergreen Learning Center and Brandon School are located approximately 1,800 feet southwest of the project site at the intersection of Evergreen Drive and Brandon Drive.

The project site is currently a large fallow field with three small, vacant buildings including a single-family residence. Although designated for Agricultural use in the City of Goleta General Plan/Coastal Land Use Plan and zoned AG-40 (Agriculture II, 40-acre minimum lot size), there is currently no agricultural activity occurring on the site, and the site has been fallow since approximately 1995 (Appendix F). The project site currently contains a 2,015-square-foot residence, 726-square-foot garage, and 1,152-square-foot barn. The project site was occupied by an avocado orchard until the mid-1990s. The property is currently used in part for the storage of woodchips and firewood.

The project site has a land use designation of Agriculture and is zoned AG-40, which does not permit residential development proposed by the project applicant. The proposed project is a qualified housing development project that utilizes the "Builder's Remedy" protections of the California Housing Accountability Act. Accordingly, pursuant to California Government Code section 65589.5(f)(6)(A), because there are no general plan designation or zoning classification that allow the density and unit type proposed by the applicant, the project applicant has identified the RS-7 zone district as the most analogous zone to the proposed project; therefore, RS-7 is used as a basis for consistency determination. The RS district is intended to protect land areas for families living in low-density residential environments by implementing the Single-Family Residential Use category land use designation established in the General Plan. Within the RS-7 zone district, the minimum lot area is 7,000 square feet. Components of the proposed project which deviate from the RS-7 zone would be evaluated consistent with California Density Bonus Law.

In 2025, the California Department of Forestry and Fire Protection (CAL FIRE) designated the project site in the Local Responsibility Area primarily designated as a Very High Fire Hazard Severity Zone, with the southeastern portion of the project site designated as a High Fire Hazard Severity Zone. Portions of the western border of the project site are located within the 100-foot Streamside Protection Area (SPA) buffer of El Encanto Creek. In addition, a small area within the southwestern portion of the project site is mapped as Environmentally Sensitive Habitat Area for Arroyo Willow Riparian Shrubland and Coastal Sage Scrub.

2.3 Proposed Project

2.3.1 Overview of Proposed Project

A "project" is defined by CEQA Guidelines Section 15378 as "the whole of an action which has a potential for resulting in either a direct physical change in the environment, or a reasonably-foreseeable indirect physical change in the environment." The project includes the following proposed improvements on the project site:

- Demolition of the existing on-site residence, garage, and barn.
- A subdivision of the existing 14.38-net acre parcel into 59 separate lots (via a Vesting Tentative Map shown in Figure 2-3).
- Construction and occupancy of 56 single-family dwellings on Lot 1 through Lot 56, of which four residences would be designated for extremely low income, one residence would be designated for lower income, three residences would be designated for moderate income, and three residences would be designated for above-moderate income levels.
- Use of Lot 57 through Lot 59 for open space containing landscape and stormwater facilities.

Table 2-1 provides a summary of the proposed project components. Site plans are provided as Appendix B.

Table 2-1 Site Information

Existing General Plan Land Use Designation	Agriculture	
Existing Zone District	Agriculture II, 40-acre minimum lot size	
Zoning Regulations Utilized for Consistency Evaluation	RS-7 (Single Family Residential, 7,000 square foot lot minimum)	
Site Size	14.38 net acres/15.8 gross acres	
Present Use and Development	Large fallow field containing a 2,015-square-foot residence, 726-square-foot garage, and 1,152-square-foot barn, chopping and storage of firewood and wood chips	
Surrounding Uses/Zoning	**North**	Glen Annie Golf Course, Zoning: AG-II-100 (Agriculture II), County of Santa Barbara
	South	Cathedral Oaks Road and single-family residential properties, Zoning RS-7
	East	Glen Annie Golf Course, Zoning: AG-II-100 (Agriculture II), County of Santa Barbara
	West	El Encanto Creek and multifamily residential properties, Zoning: DR-8 (Design Residential)
Access	**Existing Roadway**	Cathedral Oaks Road
	Proposed internal roadways and driveways	Private, internal road system with two intersections with Cathedral Oaks Road to be maintained by a Homeowners Association or Master Association comprised of the private property owners
Utilities and Public Services	**Water Supply**	Goleta Water District
	Sewage	Goleta West Sanitary District
	Electricity	Southern California Edison and Central Coast Community Energy
	Fire	Santa Barbara County Fire Department
	School Districts	Goleta Union School District; Santa Barbara Unified School District

The project would be evaluated for consistency with the regulations of the RS-7 zone district. Components of the proposed project which are not consistent with the RS-7 zone would be evaluated consistent with California Density Bonus Law. As part of the proposed project, the project applicant is requesting the following concessions/incentives or waivers pursuant to Government Code Section 65915(a) for the following deviations from City standards:

- Four waivers from the RS-7 zone district standards:
  - Proposed lot widths of less than the 65 feet required in the RS-7 zone on 31 of the 56 proposed residential lots.
  - Proposed rear yard setbacks of less than the 25 feet required on 51 of the 56 proposed residential lots.
  - Proposed side yard setbacks of less than the 6.5' required on 32 of the 56 proposed lots. The reduction accommodates eaves on no less than 5 feet to the property line.
  - Allowed maximum floor area of 35 houses exceeding the maximum permitted floor area from 208 to 1,539 additional square feet. These floor area exceedances would occur on Lots 1 through 14, 20 through 23, 25 through 29, 32, 34, 36, 40, 41, 45, 46, 48, 50, 52, and 55.
- Encroachment into the required 100-foot SPA buffer[3] of approximately 7,786 square feet (0.18 acres) in the rear yards of Lots 1 through 8. portions of the houses on Lots 1 and 2, and for portions of sidewalk in Lot 38. To compensate for SPA buffer encroachment, the proposed project design includes 0.21 acre of additional open space provided outside of and adjacent to the edge of the 100-foot SPA buffer on proposed Lot 58.

2.3.2 Residential Development

The residential units to be developed would consist of five residential dwelling types ranging in size from a single-story, 1,765-square-foot floor plan to a two-story, 3,870-square-foot floor plan. The typical roof height would range from approximately 17 feet 9 inches for single-story residences to 23 feet 10 inches for two-story residences. The individual lot sizes would range from approximately 7,000 gross square feet to approximately 19,500 gross square feet as measured to the centerline of the adjacent streets. The net area of the individual lots as measured behind the sidewalks ranges from 5,905 net square feet to 13,076 net square feet. The applicant is proposing that the residential units be designed with sustainable elements consistent with current City and California Building Code requirements, including the installation of Energy Star appliances and installation of low-flow plumbing fixtures. The proposed design of the residences would include solar photovoltaic systems pursuant to the requirements of California Building Code Title 24, Part 6.

2.3.3 Lighting

Residential lighting is proposed to include entry lighting at the front and back doors and additional pathway lighting. All exterior lighting in common areas and on individual parcels would be designed to meet the City's "dark sky" and low energy use requirements, including full shielding, the use of full cut-off lights, and directing exterior lighting downward per City of Goleta standards identified in Chapter 17.35 of the City's Municipal Code.

[3] The 100-foot SPA buffer is required by Goleta General Plan/Coastal Land Use Plan Conservation Element Policy 2.2:Streamside Protection Areas.

2.3.4 Landscaping and Stormwater Control

The landscape plan for the proposed project incorporates various features for management of stormwater and water quality. The proposed project would introduce 5.59 acres of impervious surface area to the project site. On-site stormwater from the western and central portions of the project site would be directed to the southwest portion of the project site through two 18-inch storm drains underlying the western internal roadway on-site that would convey stormwater to a detention basin located in the western portion of the project site. Stormwater in the detention basin would be directed to an existing storm drain pipe that outlets to El Encanto Creek. On-site stormwater from the eastern and northern portion of the project site would be captured via catch basins and conveyed to an underground detention system located at the southern portion of the project site adjacent to Cathedral Oaks Road. Stormwater captured in the underground detention system would discharge to an existing storm drain east of the project site within Cathedral Oaks Road. Stormwater curb extensions and permeable paver parking areas and driveways are also proposed to capture street stormwater runoff for treatment, filtration, and sediment. Above-ground rain barrels would be located at each residence to collect precipitation and roof drainage for use as supplemental irrigation. A bioswale and vegetated swale located in the open space area along Cathedral Oaks Road and in various biofiltration/collection areas on site would capture additional stormwater for filtration, infiltration, and sediment.

The landscape plan's design would be comprised of an assortment of native and non-invasive screen shrubs, accent trees, and canopy trees. The landscaping plant palette would be suitable for the regional climate of Goleta. Landscaping irrigation equipment would include a combination of low-volume spray heads, bubblers, and drip systems which would be controlled by an automatic timer with a seasonal adjustment to apply less water during the rainy season. Landscaping plans are included in Appendix B.

2.3.5 Additional Improvements

Additional improvements on the open space lots would consist of a community picnic area on proposed Lot 57 and frontage landscaping and screening on proposed Lot 59. Other infrastructure improvements included as part of the proposed project include a looped internal road system with one cul-de-sac, two intersections with Cathedral Oaks Road, the installation of landscaping, and the installation of a five-foot-wide interior sidewalk throughout the project site. The proposed project would also include frontage improvements along approximately 890 linear feet of Cathedral Oaks Road between Northgate Drive to the west and the Glenn Annie golf course property to the east. These frontage improvements include two driveway entrances to the site, curb and gutter installation, and continuation of an existing Class I[4] trail that extends east of the project site and runs parallel to Cathedral Oaks Road.

[4] A Class I trail is a pathway that provides an exclusive right-of-way for bicycle and pedestrian use and minimizes vehicle cross flows (i.e., the locations which a vehicle can cross the pathway).

Figure 2-1 Vicinity Map



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25-17793 EPS
Fig 1 Regional Location

Project Location

N

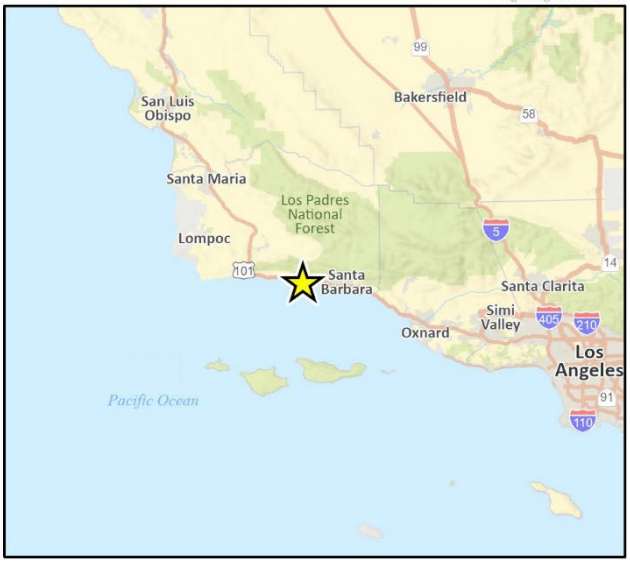


Figure 2-2 Project Site Location



Imagery provided by Esri and its licensors © 2025.

25-17793 EPS
Fig X Project Site

Figure 2-3 Vesting Tentative Map and Development Plan



Source: Appendix B

2.3.6 Utilities

The proposed project would include underground connections for sewer, water, cable television, and electricity. The proposed project would be all-electric and would not require natural gas connections. As described in Table 2-1, water service would be provided by the Goleta Water District.[5] Sewer service would be provided by Goleta West Sanitary District. Electricity would be provided by Southern California Edison or Central Coast Community Energy. Telecommunications services would be provided by a variety of companies, including Verizon and AT&T. Solid waste services would be provided by Marborg Industries.

2.3.7 Demolition and Grading

The project would involve the demolition of the existing on-site residence, garage, and barn. The structures that would be demolished total 3,893 square feet. Preliminary raw[6] earthwork volumes are estimated at 27,500 cubic yards of cut and 23,500 cubic yards of fill. The 4,000 cubic yards of excess cut would be hauled to the Tajiguas Landfill, located at 14470 Calle Real in unincorporated Santa Barbara County. The existing elevation on the property ranges from 145 feet above mean sea level along Cathedral Oaks Road northward to 252 feet above mean sea level at the northeast corner of the property, for an average slope of 7.8 percent. The finished grade elevation would range from approximately 150 feet above mean sea level to approximately 245 feet above mean sea level. The grading plan for the 56 new homes includes grading throughout the project site and installation of two 18-inch storm drains underlying the western internal roadway on-site that would convey stormwater to a detention basin located in the western portion of the project site. Stormwater in the detention basin would be directed to an existing storm drain pipe that outlets to El Encanto Creek.

2.3.8 Streamside Protection Area Buffer Encroachment

The City's current SPA policy (City of Goleta General Plan/Coastal Land Use Plan Policy CE 2.2) requires a buffer of 100 feet between development and the edge of the riparian corridor of El Encanto Creek that can be adjusted to no less than 25 feet under certain circumstances. Approximately 1.12 acres (49,148 square-feet) of the El Encanto Creek SPA buffer occur on the project site. Approximately 7,786 square feet of proposed residential development would encroach into the SPA which includes portions of the houses proposed Lots 1 and 2, along with some or all the private rear yards of Lots 1 through 8. Trenching for a new, 90-foot-long storm drain pipe and approximately 11,283 square feet of proposed stormwater detention would be located in the SPA buffer on Lot 58. Otherwise, the SPA on Lot 58 is proposed for a meandering walking path, landscape, and approximately 65 linear feet of sidewalk. A waiver pursuant to State Density Bonus Law is being utilized to allow the encroachment of these proposed project features in the SPA buffer. The landscaping proposed in the SPA buffer on Lot 58 is intended to protect the biologic value and function of the stream. The specific square footage of SPA encroachment proposed is provided in Table 2-2.

[5] In the event that Goleta Water District issues a water moratorium in the future such that it cannot provide water supplies for this proposed project, the applicant may use Goleta Water District's conveyance system to transport water from another supplier.

[6] "Raw" earthwork volumes have not been factored to account for changes in volume due to bulking, over excavation and recompaction, and construction methods.

Table 2-2 SPA Encroachment

Lot Number	SPA Buffer Encroachment (Square Feet)
1	2,051
2	1,279
3	751
4	761
5	622
6	902
7	728
8	61
38	631
Total Square Footage	**7,786**

2.3.9 Construction Timeline

Construction is anticipated to start in January 2027. The total duration for all construction phases for the proposed project is estimated to be 14 to 18 months, once building permits are issued. No phasing plan is proposed.

2.3.10 Objectives

The proposed project as described in Section 2.3 is intended to meet the following objectives:

1. Develop up to 56 residential units on underutilized land located within Goleta.
2. Provide residential development in Goleta to fulfill the housing stock envisioned in the City's adopted 2023-2031 Housing Element.
3. Provide housing opportunities for extremely low income, lower income, and moderate income-level persons to support the City in complying with its Regional Housing Needs Allocation requirements.
4. Improve accessibility and encourage active transportation for bicycles and pedestrians in Goleta.
5. Design residences to incorporate green building measures to encourage the use of energy and water efficient technology.

2.4 Required Approvals

The proposed project requires the following City approvals:

- Approval over the issuance of a permit for the demolition of the existing residence, garage, and barn.
- Approval of a vesting tentative map (05-154-VTM), as shown in Figure 2-3, to allow division of the existing 14.38-acre parcel, APN 077-530-019, into 59 separate lots and the development of 56 single-family dwellings and open space areas.

- Approval of a Development Plan (05-154-DP) for the development of 56 residences, of which four residences would be designated for extremely low income, one residence would be designated for lower income, three residences would be designated for moderate income, and three residences would be designated for above-moderate income levels. The Development Plan would also include the proposed associated landscape and hardscape improvements, roadways, and utility and stormwater infrastructure.
- Approval of concessions/incentives or waivers for lot width, rear yard setback, side yard setback reductions, and FAR exceedance, and reduction of the El Encanto Creek 100-foot SPA buffer pursuant to State Density Bonus Law.
- Ministerial approval of the issuance of a permit for the construction of the proposed residences.

The proposed project would also be subject to permitting and review by other regulatory agencies, as follows:

- Construction General Permit from the State Water Quality Control Board for disturbances over 1 acre requiring preparation of a Stormwater Pollution Prevention Plan.
- Site plan review and building safety inspection from the Santa Barbara County Fire District in accordance with Santa Barbara County Fire District standards. The Santa Barbara County Fire District would ensure site design is consistent with the fire safe standards within the Goleta Community Wildfire Protection Plan.
- A Can and Will Serve letter from the Goleta Water District identifying that Goleta Water District has adequate water supply to serve the proposed project.
- A Lake and Streambed Alteration Agreement from the California Department of Fish and Wildlife for potential impacts to arroyo willow thicket riparian habitat associated with El Encanto Creek.
- A Clean Water Act Section 401 Water Quality Certification from the Central Coast Regional Water Quality Control Board for potential impacts to arroyo willow thicket riparian habitat associated with El Encanto Creek.

Additional regulatory requirements are also discussed in their respective resource areas in Chapter 4.

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3 Related Projects

CEQA Guidelines Section 15130 requires EIRs to discuss cumulative impacts when the project's incremental effects are significant when viewed in connection with the effects of past projects, current projects, and probable future projects. It further states that such discussion must reflect the severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the impacts of the project alone. CEQA Guidelines Section 15355 defines cumulative impacts to be "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."

CEQA Guidelines Section 15130(b)(1) requires that information from one of the following two sources must be included when analyzing significant cumulative impacts:

1. A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
2. A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative impact analysis contained in this Revised Draft EIR uses the first method described above, also referred to as the list approach. The list of cumulative projects considered in this analysis was compiled based on planned, pending, and reasonably foreseeable projects at the time of the start of the preparation of this Revised Draft EIR in August 2025. Projects proposed following August 2025 are not considered.

The cumulative analysis considers projects listed within the City of Goleta's most recent (September 2025) Cumulative Project List, City of Goleta's current Capital Improvements Program projects, California Department of Transportation roadway projects occurring within Goleta, and known nearby projects in the County of Santa Barbara with potential to combine with proposed project impacts to result in a cumulative impact. Individual cumulative analyses within each impact subsection of Chapter 4 also define the appropriate geographic scope considered within the analysis. Each cumulative project considered within this EIR has, at a minimum, begun the process of completing a development application.

The list of past, present, and probable future projects within the City of Goleta producing related or cumulative impacts is presented in Table 3-1. As detailed therein, cumulative projects within the City of Goleta include construction of a total of 534 residential units, 440,599 square feet of industrial space (automotive service facilities, industrial buildings, distribution/delivery facilities, indoor/outdoor storage, and a repurposed hangar building), and 163,930 square feet of commercial space (shopping center improvements, automotive dealerships, a golf pro shop, a coffee shop, and office facilities). Cumulative projects also include oil and gas infrastructure removal, animal shelter renovations, construction and renovation of medical facilities, parkland improvements, one synagogue, one church, hotel renovations, battery energy storage infrastructure, restoration and habitat management activities, and various roadway improvements. In addition, while not within the

City of Goleta, the Santa Barbara County Board of Supervisors approved a rezone of the Glen Annie Golf Course for the development of 800 to 1,000 residential units as part of the County's 2023-2031 Housing Element Update (County of Santa Barbara 2025a). Given the proximity to the project site, this potential residential development is included in Table 3-1.

Table 3-1 List of Cumulative Projects

Project	Location	Project Description	Distance from Project Site	Status
Projects Under Construction				
Annual Pavement Rehabilitation Project and Pavement Management Program	Cathedral Oaks Road, Hollister Avenue, Kellogg Avenue, Glen Annie Road, Calle Real, and a few residential roadways	Annual pavement rehabilitation and management of city streets.	Adjacent to the south at Cathedral Oaks Road	Under Construction
Rectangular Rapid Flashing Beacons Improvements at School Crossings	Cathedral Oaks Road at Brandon Drive and Evergreen Drive	Installation of rectangular rapid flashing beacons at two school crosswalks across Cathedral Oaks Road at Brandon Drive and Evergreen Drive to enhance pedestrian safety.	0.3-mile southwest	Under Construction
Hollister Class I Bike Path Lighting	Hollister Avenue from Pacific Oaks Road to Ellwood Elementary School	Installation of lighting along the Class I bike path on Hollister Avenue.	0.8-mile south	Under Construction
Cathedral Oaks Crib Wall Repair	Cathedral Oaks Road	Repair of the crib wall along Cathedral Oaks Road.	1.0 mile southwest	Under Construction
Ellwood Butterfly Habitat Management Plan Implementation	Ellwood Mesa Open Space and Sperling Preserve	Implementation of a management program to restore Monarch butterfly aggregation sites, enhance biodiversity, maintain public access, and other management plan activities.	1.0 mile southwest	Under Construction
Ellwood Tree Safety Emergency Permit and Ellwood North Restoration	Ellwood Mesa Open Space and Sperling Preserve	Emergency tree removal for safety reasons through habitat enhancements in monarch butterfly aggregation sites.	1.0 mile southwest	Under Construction
Storke Road - Hollister Avenue Transit, Bike-Ped, and Median Improvements	Storke Road south of Hollister Avenue	Improvements to transit, bike-pedestrian facilities, and medians along Storke Road and Hollister Avenue.	1.3 miles southeast	Under Construction
Beach Hazards Removal	Haskell's Beach	Removal of remnant oil and gas infrastructure hazards along the coastline.	1.7 miles southwest	Under Construction
Heritage Ridge	North side of Camino Vista between Aero Camino and Calle Koral Roads	Construction of 102 affordable housing units, two caretaker units, and 228 market rate apartments.	1.9 miles southeast	Under Construction
Hollister Avenue Old Town Interim Striping	Hollister Avenue, between South Fairview Avenue and South Kellogg Avenue	Interim striping improvements to enhance safety and traffic flow.	3.2 miles southeast	Under Construction

Project	Location	Project Description	Distance from Project Site	Status
Crosswalk at Calle Real - Fairview Center - Pedestrian Hybrid Beacon	Calle Real, approximately 550 feet west of the Fairview Avenue and Calle Real intersection	Installation of a pedestrian hybrid beacon at the crosswalk near Fairview Center.	3.2 miles east	Under Construction
Auto Service Bay Addition and Conversion	180 North Fairview Avenue	Expansion of the convenience store into the former service bays, exterior and interior remodel of the entire building addition of a trash enclosure, landscaping and other site improvements.	3.2 miles east	Under Construction
Ekwill Street & Fowler Road Extensions	Old Town Goleta from Kellogg Avenue to Fairview Avenue	Extension of Ekwill Street and Fowler Road to improve connectivity.	3.4 miles southeast	Under Construction
Platform Holly Decommissioning	Pacific Ocean, 2 miles from shore	Plugging and abandonment of 32 existing oil wells.	3.7 miles south	Under Construction
San Jose Creek Bike Path	Adjacent to San Jose Creek, from Armitos Avenue to Hollister Avenue	Construction of a bike path along the extent of San Jose Creek.	3.8 miles southeast	Under Construction
Santa Barbara Humane Campus Renovation	5399 Overpass Road	Replacement of 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).	4.1 miles east	Under Construction
Goleta Valley Cottage Hospital New Rehabilitation Pool/Center	351 South Patterson Avenue	Interior remodel of the main hospital building and the construction of an aquatic facility in the southern parking lot.	4.4 miles southeast	Under Construction
Goleta Valley Cottage Hospital Permanent Hollipat Parking Lot	334 South Patterson Avenue	Construction of a permanent parking lot.	4.4 miles southeast	Under Construction
Approved Projects				
Coastal Trails and Habitat Restoration Project	Ellwood Mesa Open Space and Sperling Preserve	Improvement of 7.1 miles of trails, three drainage crossings, two beach access points, and 13 acres of habitat restoration.	1.0 mile south	Approved
Goleta Energy Storage Augmentation Units	6864 Cortona Drive	Install up to 132 Tesla Powerpack 3 Augmentation units to the existing Goleta Energy Storage facility. The Augmentation units will not alter the overall site power of 60 megawatts/160 megawatt-hours.	1.1 miles southeast	Approved

Project	Location	Project Description	Distance from Project Site	Status
Storke Medical Center	6975 Santa Felicia	Specific Plan Amendment and construction of two medical office buildings of 18,600 square feet each with accessory childcare in 2,113 square feet of the westerly building.	1.3 miles southeast	Approved
Girsh Park Lights	7000 Phelps Road	Replace existing temporary mobile light towers (4) with installation of six (6) permanent lights on wooden poles that will be 50 feet in height.	1.3 miles southeast	Approved
Fire Station 10	7952 Hollister Avenue	Construction of an 11,600 square foot fire station.	1.4 miles southwest	Approved
14 Residential Unit Mixed Units	6491 Calle Real	Mixed-use development consisting of 14 one-bedroom residential units, ranging in size from 587 to 869 square feet, and one commercial office space of 585 square feet.	1.9 miles east	Approved
New 7,390-square-foot Synagogue	6045 Stow Canyon Road	Construction of a new 7,390-square-foot synagogue with changes to existing campus buildings and revisions to parking and landscaping.	3.1 miles east	Approved
Old Town Coffee Parking Modification	5877 Hollister Avenue	Reduce required parking.	3.3 miles southeast	Approved
Calle Real Shopping Center Improvement	5697, 5785, 5677, and 5687 Calle Real	Updates to the architecture of the shopping center with the intention of modernizing building facades and adding site amenities.	3.3 miles east	Approved
Sywest Industrial Building	907 South Kellogg Avenue	Construction of a new, 70,594 sf high cube industrial building.	3.5 miles southeast	Approved
3D Printed Dwelling	550 Cambridge Drive	New 1,433 square foot single story residence with a 460 square foot attached two-car garage. The proposed dwelling will be constructed using 3D-printing.	3.7 miles east	Approved
Honda Dealership – Design Plan Amendment	475 South Kellogg Avenue	New service bays (3,504 square feet) and auto-detailing canopy (1,176 square feet). New showroom addition and canopy structures totaling 6,860 square feet and associated site improvements.	3.8 miles southeast	Approved

Project	Location	Project Description	Distance from Project Site	Status
Pending Projects				
Glen Annie Golf Course Residential Development[1]	405 Glen Annie Road	Redevelopment of the existing Glen Annie Golf Course with between 800-1,000 residential units. This project is within unincorporated Santa Barbara County and subject to the County's review and approval.	Adjacent to the north and east of the project site.	County Board of Directors approved a rezone of the project site for residential development. Application not yet submitted.
City Ventures New Housing	7360 Hollister Avenue	Development of 59 residential units with a residential density of 21.2 dwelling units per acre.	0.7-mile south	Application Approval Pending
Kenwood Village	7300 block of Calle Real, west of Baker Lane	Construction of 60 new residences including 13 new lots for single family homes, 20 duplexes for residences, 27 triplex residences and 145 parking spaces.	0.8-mile southeast	Pending Complete Application/On hold
Viajero Battery Storage Project	Northern terminus of Via Jero Drive	Construction and operation of a utility-scale battery energy storage system with batteries arrayed in separate ground-mounted enclosures with a stormwater retention basin constructed on the southern edge of the facility and landscaping installed along the perimeter of the parcel.	1.1 miles southwest	Environmental Review
Mini Storage	7780 Hollister Avenue	Demolition of an existing park-and-ride facility (494 spaces) and development of new self-storage facility on an approximate 5.39-acre lot.	1.1 miles southwest	Environmental Review
Sandpiper Golf Course	7925 Hollister Avenue	Redesign the existing golf course and construct on-site facilities, including a new, 37,179 square foot golf clubhouse, a restored gas station repurposed as a 1,044 square foot coffee shop, a new comfort station, upgraded maintenance facilities, and roadway improvements along Hollister Avenue.	1.2 miles southwest	Environmental Review
Ellwood Beach Drive Drainage Repair	Southern terminus of Ellwood Beach Drive	Demolition of unsuitable concrete, removal of existing stormwater drainage infrastructure, replacement of existing 18-inch pipes, and revegetation.	1.3 miles south	Environmental Review

Project	Location	Project Description	Distance from Project Site	Status
Ellwood Mesa Vertical Access Project	Ellwood Mesa/Sperling Preserve Open Space	Construction of two trail segments that provide vertical access from the blufftop to the beach below and 5 acres of restoration that would create two bioswales to retain water on the blufftop.	1.5 miles south	Environmental Review
Hangar 5 Relocation	115 Castilian Drive	Adaptive reuse of two Quonset huts and a former Santa Barbara Airport Hangar 5 with parking and landscape.	1.5 miles southeast	Environmental Review
CBP Self- Storage	6750 Navigator Way	Convert an existing vacant building into a mini-warehouse storage and develop two new mini-warehouse buildings. The total square footage would be 122,381 square feet.	1.5 miles southeast	Application Approval Pending
Google Research and Development	355 Coromar Drive	Development of a 98,552 square foot research and development building with a three-level parking garage. The total net building area is approximately 103,935 square feet.	1.6 miles southeast	Environmental Review
New Anthem Church and changes to Christ Lutheran Church	6595 Covington Way	Construction of a new 2-story 22,038 square foot Church/Day Care with a reduction in Environmentally Sensitive Habitat Area (monarch) buffer, and other adjustments to the zoning ordinance.	1.8 miles east	Environmental Review
Fairview Gardens Conditional Use Permit	598 North Fairview Avenue	Conditional use permit for all farm operations, proposed housing, and proposed special events. Details on the specific number of housing units and special events pending applicant resubmittal of project description.	3.2 miles east	Environmental Review
46 Residential Units	5955 Calle Real	Construction of 46 residential units.	3.2 miles east	Application Approval Pending
Indoor Storage Building	TBD	Construction of an indoor storage building totaling 66,924 square feet.	3.4 miles southeast	Application Approval Pending
Pine Avenue Research and Development	Assessor's Parcel Number 071-170-083	Construction of a 2,587 square foot research and development building with a trash and recycling enclosure, outdoor patio, and an entrance plaza.	3.4 miles southeast	Application Approval Pending

Project	Location	Project Description	Distance from Project Site	Status
Kellogg Outdoor Fenced Storage Yard	891 South Kellogg Road	Construction of an outdoor storage yard with 136 individual outdoor storage plots totaling 169,160 square feet.	3.5 miles southeast	Application Approval Pending
20 Residential Unit Conversion	5638 Hollister Avenue	Conversion of an existing commercial building into a mix of 20 residential units and commercial space.	3.7 miles southeast	Application Approval Pending
Toyota Dealership– Design Plan Amendment	5611 Hollister Avenue	Demolition of the existing detached service bays within the Streamside Protection Area and construction of new detached service bays outside of the Streamside Protection Area, additions to existing service bays, and an overhang addition. Square footages are to be determined.	3.8 miles southeast	Development Plan Amendment Review
San Jose Creek Fish Passage Improvements	San Jose Creek, extending approximately 100 feet upstream and 4,000 feet downstream of Hollister Avenue	Redesign, maintenance, and repair (or removal) of the existing weirs within the San Jose Creek concrete channel.	3.9 miles southeast	Environmental Review
The Steward 3rd Story Addition	5490 Hollister Avenue	Renovation of an existing 2-story, 12 guest room building. A third story with 10 guest rooms will be added. In addition, two water tanks would be renovated.	4.0 miles east	DPAM Approval Pending
Goleta United States 101 Overcrossing	US 101 at Hollister Avenue	Construction of a new overcrossing over United States Highway 101 in Goleta.	4.1 miles east	Conceptual Design
Conversion of 1 Commercial Spaces to Residential Units	5350 Hollister Avenue Unit F	Revision to the conditional use permit for the conversion of one existing ground-floor commercial spaces to a residential unit.	4.3 miles southeast	Application Approval Pending
Conversion of 1 Commercial Spaces to Residential Units	5350 Hollister Avenue Unit G	Revision to the conditional use permit for the conversion of one existing ground-floor commercial spaces to a residential unit.	4.3 miles southeast	Application Approval Pending

[1] The Glen Annie Golf Course Residential Development project is located outside of the City of Goleta within unincorporated Santa Barbara County. Given the Glen Annie Golf Course Residential Development project's proximity to the project site, the project has been included herein; however, cumulative analyses related to population projections are based solely on cumulative growth within Goleta.

Source: City of Goleta 2025a, 2025b; County of Santa Barbara 2025a, 2025b

4 Environmental Impact Analysis

4.0 Introduction

This chapter describes the environmental resource areas analyzed, the organization of sections, and the environmental resource areas eliminated from further discussion within this Revised Draft EIR.

Environmental Resources Analyzed in the Revised Draft EIR

The scope of this EIR is based on the proposed project description outlined in Chapter 2, as well as comments received during the scoping process, focusing on environmental issues that could result in potentially significant impacts. This chapter of the EIR analyzes potentially significant impacts from the proposed project as it relates to 14 environmental resources determined to be potentially significant, which include:

- Section 4.1 Aesthetics and Visual Resources
- Section 4.2 Air Quality
- Section 4.3 Biological Resources
- Section 4.4 Cultural Resources
- Section 4.5 Geology and Soils
- Section 4.6 Greenhouse Gas Emissions
- Section 4.7 Hazards and Hazardous Materials
- Section 4.8 Hydrology and Water Quality
- Section 4.9 Land Use and Planning
- Section 4.10 Noise
- Section 4.11 Transportation and Circulation
- Section 4.12 Tribal Cultural Resources
- Section 4.13 Utilities and Service Systems
- Section 4.14 Wildfire

Sections 4.1 through 4.14 provide a detailed discussion of the environmental setting, regulatory framework, project impacts, and mitigation measures designed to reduce significant impacts where required and when feasible. The residual impacts following implementation of any mitigation measures also are discussed. The organization of each subsection is described in Section 4.0.4, below. The resource areas excluded from further analysis because they would not have significant impacts are discussed in Section 4.0.2, and include:

- Agriculture and Forestry Resources
- Energy
- Mineral Resources
- Population and Housing
- Public Services
- Recreation

4.0.1 Organization of Environmental Impact Analysis

Each section (4.1 through 4.14) addresses the environmental resource areas listed above and contains the following information in each section:

- **Existing Conditions.** This subsection describes the physical environmental conditions in the proposed project area as they relate to the environmental resource area in question. *CEQA Guidelines* establish that existing conditions normally constitute the baseline physical conditions by which the lead agency (in this case, the City) determines whether or not an impact is significant.
- **Regulatory Framework.** This subsection summarizes the regulations, plans, and standards that apply to the proposed project and relate to the specific issue area in question.
- **Thresholds of Significance.** This subsection identifies the significance criteria or, where applicable, the thresholds of significance that will be used to evaluate the proposed project's impacts. The criterion or threshold for a given environmental impact is the level at which the City finds the impact to be significant. Significance criteria can be a quantitative or qualitative standard, or set of criteria, pursuant to which the significance of a given environmental impact may be determined (*CEQA Guidelines* Section 15064.7). The analysis relies on the significance thresholds from Appendix G of the *CEQA Guidelines* and the County of Santa Barbara's 2024 *Environmental Thresholds and Guidelines Manual*, which have been adopted by the City of Goleta.[1]
- **Project Impacts.** The environmental analysis considers the proposed project's potential impacts resulting from short-term construction and long-term occupancy of the proposed project. While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions:
  - **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 proposed 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 impact may be suggested if readily available and easily achievable.
  - **Class IV, Beneficial.** An impact that would reduce existing environmental problems or hazards.
  - **No Impact.** Occurs when the proposed project does not have any potential to result in any impact associated with the specific significance criteria evaluated within 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 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 2024.

- **Mitigation Measures.** For each identified Class I or Class II impact, mitigation measures are provided to reduce the severity of the impact to the extent feasible. Following the implementation of mitigation measures, the analysis identifies the residual level of significance for each impact, including any significant and unavoidable adverse impacts that cannot be mitigated to a less-than-significant level. Based on these classifications and mitigation measures, the environmental impact analysis assesses each issue area to determine the significance of potential impacts and the effectiveness of mitigation.
- **Cumulative Impacts.** This subsection identifies the potential for significant cumulative impacts to occur as a result of the proposed project in combination with other development anticipated in the vicinity of the project site. Where this potential exists, a determination is made as to whether or not the proposed project's contribution to this impact is cumulatively considerable.

4.0.2 Resource Areas Eliminated from Further Analysis

Pursuant to *CEQA Guidelines* Section 15128, an EIR must contain a brief discussion of the reasons that various impacts were determined not to be significant, and therefore not discussed in detail in the EIR. The proposed project was evaluated against *CEQA Guidelines* Appendix G criteria and the 2024 County of Santa Barbara *Environmental Thresholds and Guidelines Manual*. As a result of that evaluation, several environmental resource areas were eliminated from further analysis. A summary of these resource areas and why they were eliminated from further analysis follows below.

4.0.2.1 Agriculture and Forestry Resources

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines,* which provides the following to determine if a project would have a potentially significant impact on agriculture and forestry resources:

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?

Santa Barbara's 2024 *Environmental Thresholds and Guidelines Manual* does not include specific thresholds for Agriculture and Forestry Resources outside of those in *CEQA Guidelines* Appendix G. Therefore, the following analysis relies solely on the *CEQA Guidelines* Appendix G thresholds identified above.

Project Impacts

Agriculture on the project site consists of an approximate 14.38 net-acre fallow field, which has not been in agricultural use since 1995 (Appendix F-1), and three associated structures. According to the California Important Farmland Finder (California Department of Conservation [DOC] 2022), the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would not convert Farmland to non-agricultural use.

The proposed project is a qualified housing development project that utilizes the "Builder's Remedy" protections of the California Housing Accountability Act. Accordingly, pursuant to California Government Code section 65589.5(f)(6)(A), because there are no general plan designation or zoning classification that allow the density and unit type proposed by the applicant, the project applicant has identified the RS-7 zone district as the most analogous zone to the proposed project. The Builder's Remedy would allow the proposed residential development to be developed in accordance with the development standards of the RS-7 zone within an area zoned for Agriculture without requiring a zoning change. Accordingly, the proposed project would not conflict with current Agricultural zoning, as such development would be permitted in accordance with the provisions of Builder's Remedy. Additionally, based on the California Department of Conservation's Williamson Act map (DOC 2025), the site is not under a Williamson Act contract. As such, the proposed project would not conflict with any existing agricultural zoning or any Williamson Act contract. Based on the above, the proposed project would have no impact on agricultural resources.

The project site is not zoned for forest land, timberland, or timberland production, as defined by Public Resources Code sections 12220(g), 4526, or Government Code section 51104(g). There are no forest resources present on the site, and the surrounding area is developed for recreational and residential uses. Therefore, the proposed project would not conflict with forest or timberland zoning, nor would it result in the loss or conversion of forest land to non-forest uses.

The proposed project would not involve other changes in the existing environment that could indirectly lead to the conversion of farmland or forest land. The project site is fallow and is surrounded by residential and recreational uses. Given the absence of agricultural uses on-site or in the vicinity of the project site, the proposed project would not result in the conversion of farmland to non-agricultural or uses. Similarly, neither forest nor timberland resources would be lost or converted to non-forest uses because no forest or timberland exists on-site or in the vicinity of the project site. Based on the above, the proposed project would have no impact on forestry resources.

4.0.2.2 Energy

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*, which provides the following to determine if a project would have a potentially significant impact on energy:

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

Santa Barbara's 2024 *Environmental Thresholds and Guidelines Manual* does not include specific thresholds for Energy Resources. Therefore, the following analysis relies solely on the *CEQA Guidelines* Appendix G thresholds identified above.

Project Impacts

Construction activities would involve temporary energy including fuel for equipment and vehicles and electricity for site operations. These activities would be short-term and not considered excessive given the project's scale and duration. Energy use would not be considered excessive as 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.[2] Furthermore, as a Condition of Approval, the City would require the use of construction equipment that meets the USEPA Tier 4 emissions standards for non-road diesel engines, which result in improved fuel efficient compared to other tiers of diesel engines (Mico Equipment 2024). In addition, heavy-duty equipment would be subject to the United States Environmental Protection Agency 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. California Energy Code (Title 24, Part 6) and CALGreen (Title 24, Part 11) sets minimum energy efficiency standards for building systems such as insulation; heating, ventilation, and air conditioning; lighting; and water heating. CALGreen mandates sustainable building practices including water conservation, indoor air quality, and construction waste reduction (California Energy Commission 2025a; 2025b). The residences would incorporate energy-efficient design features consistent with Title 24. For example, the proposed project's inclusion of Energy Star appliances and low-flow plumbing fixtures is consistent with these codes and requirements. Exterior lighting would also comply with the City of Goleta's "dark sky" ordinance (Municipal Code Chapter 17.35), further minimizing unnecessary energy use associated with lighting. Furthermore, during operation the proposed project would not require the use of natural gas as the proposed residences would be all-electric. Adherence to regulatory requirements designed to reduce energy consumption would ensure the construction and operation of the proposed project would not involve the wasteful, inefficient, or unnecessary use of energy. This impact would be less than significant.

The proposed project would be consistent with City of Goleta Conservation Element Policy CE 13.1 and Policy CE 13.3, which encourages energy conservation through efficient building design and the use of renewable energy technologies because proposed project design and construction would comply with standards set in California Building Code Title 24, which require implementation of energy-efficient light fixtures, building materials, and heating, ventilation, and air conditioning equipment. The proposed design of the residences would include solar photovoltaic systems pursuant to the requirements of California Building Code Title 24, Part 6. Adherence to these standards would ensure the proposed project would minimize energy consumption in the new residences (City of Goleta 2025a). In addition, the proposed project aligns with the City's Strategic Energy Plan by sourcing electricity from Southern California Edison, which is required under Senate Bill 100 to procure 60 percent renewable energy by 2030 and 100 percent by 2045. In addition, residents would have the opportunity to opt-in to the Central Coast Community Energy electric procurement system, which procures electricity from renewable sources for delivery. Central Coast Community Energy has an overarching goal of sourcing 100 percent clean energy by 2030 (Central Coast Community Energy 2025). Accordingly, the proposed project would be supplied with renewable electricity in accordance with the requirements of Senate Bill 100 either by SCE in 2045 or by Central Coast Community Energy

[2] Off-road diesel vehicles would include construction equipment powered by diesel. Based on the *CalEEMod Memorandum for the Shelby Property Residential Project* (Appendix C), all construction equipment would be diesel powered. This includes excavators, concrete/industrial saws, bulldozers, loaders, graders, scrapers, cranes, forklifts, generator sets, welders, pavers, paving equipment, rollers, and air compressors.

in 2030. The proposed project would result in localized increases in fuel use from vehicles as residents travel to and from the project site. However, this energy expenditure would not be considered wasteful, inefficient, or unnecessary as vehicles are generally motor vehicles are designed to be fuel-efficient. In addition, the proposed project includes the continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road, which would promote alternative modes of transportation for residents and encourage less vehicle use, thereby reducing energy use associated with vehicle trips. 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.

4.0.2.3 Mineral Resources

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*, which provides the following to determine if a project would have a potentially significant impact on mineral resources:

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?

Santa Barbara's 2024 *Environmental Thresholds and Guidelines Manual* does not include specific thresholds for Mineral Resources outside of those in *CEQA Guidelines* Appendix G. Therefore, the following analysis relies solely on the *CEQA Guidelines* Appendix G thresholds identified above.

Project Impacts

The California Geological Survey's 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 (California Geological Survey 2011). MRZ-1 designations indicate areas containing little or no mineral deposits and MRZ-3 designations indicate deposits identified but require further evaluation. Accordingly, there are no known mineral resources of regional or statewide value identified on the project site. Furthermore, in accordance with Section 17.37.050 of the City's Municipal Code, surface mining is prohibited within Goleta; therefore, the development of the proposed project would not result in any loss of mineral resources as under existing conditions mineral resources could not be extracted within Goleta. Therefore, no impact related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state would occur.

The project site does not contain any existing mineral extraction activities, and no such activities are planned within the City of Goleta. The project site is not delineated on the City's General Plan/Coastal Land Use Plan, specific plan, or any other land use plan as a mineral resource recovery site. The nearest known extractive industry is the historic Ellwood Oil Field which is located approximately 2.3 miles southwest of the project site, which ceased operations in 2017 (California State Lands Commission 2025). Therefore, the proposed project would not result in the loss of availability of a locally important mineral recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur.

4.0.2.4 Population and Housing

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*, which provides the following to determine if a project would have a potentially significant impact on population and housing:

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?

Santa Barbara's 2024 *Environmental Thresholds and Guidelines Manual* does not include specific thresholds for impacts to Population and Housing outside of those in *CEQA Guidelines* Appendix G. Therefore, the following analysis relies solely on the *CEQA Guidelines* Appendix G thresholds identified above.

Project Impacts

The proposed project would result in the development of new residential units, which would directly contribute to population growth in Goleta. According to the California Department of Finance (2025), the current population of Goleta is approximately 32,747 people. Based on the City's average household size of 2.59 persons per household (California Department of Finance 2025), the proposed project would result in an estimated population increase of 145 people, bringing the total to approximately 32,892 residents. This increase is within the growth projections developed by the Santa Barbara County Association of Governments, which estimate that Goleta's population will reach 34,700 by 2050 (Santa Barbara County Association of Governments 2019). Therefore, the proposed project's impact related to substantial unplanned population growth would be less than significant.

The project site currently contains a vacant single-family residence and two vacant accessory structures. The proposed project would not displace people because the on-site residence is vacant. The project would also not necessitate the construction of replacement housing elsewhere. While the project would require demolition of one on-site residence, the project would increase housing in the City by developing 56 residences. Therefore, the proposed project's impact related to the displacement of substantial people or housing would be less than significant.

4.0.2.5 Public Services

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*, which provides the following to determine if a project would have a potentially significant impact on public services:

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.

Pursuant to the County of Santa Barbara's 2024 *Environmental Thresholds and Guidelines Manual*, impacts are classified as potentially significant with regard to schools if:

- A project would generate sufficient students to require an additional classroom. This assumes 29 students per classroom for elementary/junior high students, and 28 students per classroom for high school students, based on the lowest student per classroom loading standards of the State school building program. This threshold is to be applied in those school districts which are currently approaching, at, or exceeding their current capacity.

Project Impacts

The proposed project would introduce approximately 145 new residents[3] to the City of Goleta. This additional population could place some pressure on existing public facilities and services, potentially affecting service ratios and response times. However, public safety services, including fire and police protection, would be supported through the payment of development impact fees required for new residential subdivisions. These fees help fund capital improvements and ensure that new development contributes its fair share toward maintaining acceptable service ratios and response times (City of Goleta 2025a). The City's General Plan/Coastal Land Use Plan includes policies (PF 3 Public Safety Services and Facilities, PF 3.2 New Fire Station in Western Goleta, PF 3.3 Impact Fees for Fire Protection Facilities/Equipment, and PF 3.8 Impact Fee for Police Facilities) to accommodate projected growth in public safety services, including the planned addition of a new fire station within Goleta. As population increases, so does the demand for fire and police protection services, which may require additional facilities to maintain adequate service levels. The proposed project itself does not necessitate construction of Fire Station 10; rather, 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 adequate service in Goleta. The proposed project would contribute incrementally to population growth, but given the relatively small increase in population and the availability of existing services supplemented by impact fees, the proposed project itself would not necessitate new or physically altered fire or police facilities. Therefore, the proposed project's impact related to new or physically altered fire or police facilities would be less than significant.

The proposed project would include 56 residential units. Using a student generation factor of 0.2 students per residential unit per school district, consistent with the student generation factor utilized in the City of Goleta General Plan/Coastal Land Use Plan Final EIR (City of Goleta 2006), the proposed project could generate approximately 11 students. Local public schools in Goleta are within the Goleta Union School District and Santa Barbara Unified School District. Goleta Union School District has an enrollment of approximately 1,613 students and a capacity of approximately 2,178 students, while Santa Barbara Unified School District has an enrollment of approximately 2,772 students and a capacity of approximately 3,861 students (City of Goleta 2024). The proposed project's addition of

[3] Based on the city's average household size of 2.59 persons, as mentioned under the Population and Housing subsection, the 56 new housing units created through this project would house approximately 145 new residents.

approximately 11 students would not exceed the capacities of these school districts. As the school district is not approaching or currently exceeding its student capacity, the City's environmental threshold mentioned above under Significance Thresholds would not apply. Therefore, the proposed project's impact related to new or expanded school facilities would be less than significant.

The proposed project would introduce approximately 145 new residents, which would incrementally increase demand for library services at the Goleta Valley Library; however, this population increase would not place substantial additional demand on library services or inhibit the ability for the Goleta Valley Library to maintain material circulation. The Goleta Valley library, which maintains an annual circulation of approximately 600,000 items (Santa Barbara Visitor's Guide 2025), is temporarily closed for a period of 18 to 24 months, which began in April 2025, for renovations. Given the proposed construction schedule, project residents would not be added to the Goleta population until after the Goleta Valley Library is reopened. Once reopened, the renovated library facility would be sufficient to accommodate project-generated demand without requiring expansion of facilities as the facility would be able to maintain adequate circulation for the Goleta Valley Library. In addition, the project applicant would be required to pay the City's Development Impact Fee specifically for Library Facilities, as required by Section 17.70.040 of the City's Municipal Code, which are used to finance public infrastructure, including library improvements. Therefore, the proposed project's impact related to new or expanded library facilities would be less than significant.

4.0.2.6 Recreation

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*, which provides the following to determine if a project would have a potentially significant impact on recreation:

1. 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?
2. 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?

Santa Barbara's 2024 *Environmental Thresholds and Guidelines Manual* does not include specific thresholds for impacts to Recreation outside of those in *CEQA Guidelines* Appendix G. Therefore, the following analysis relies solely on the *CEQA Guidelines* Appendix G thresholds identified above.

Project Impacts

Goleta operates 31 parks and recreational facilities totaling approximately 550 acres (City of Goleta 2025b). Goleta has established a goal of maintaining 10 acres of parkland per 1,000 residents, and currently exceeds that goal with a ratio is 16.8 acres per 1,000 residents (City of Goleta 2025b).

The proposed project would add approximately 145 new residents to the City of Goleta, which would incrementally increase demand for neighborhood and regional parks and slightly reduce the City's parkland ratio to 16.7 acres per 1,000 residents.[4] This represents a minimal change and would not cause substantial physical deterioration of existing facilities. In addition, the project includes on-site

[4] Based on the city's population, mentioned above under the Population and Housing subsection, the city currently has approximately 32,747 residents. The current population divided by the 550 acres of parkland the city currently operates would be approximately 16.8 acres per 1,000 residents.

open space amenities, such as a community picnic area and landscaped lots, which would provide passive recreation opportunities for residents and reduce reliance on off-site facilities. The project applicant would also be required to pay Quimby Act parkland dedication or in-lieu fees, which fund the development and maintenance of parks and recreational facilities. Accordingly, the proposed project's impact related to the substantial physical deterioration of parks and recreational facilities would be less than significant.

The project would include limited on-site recreational improvements, including a community picnic area and continuation of an existing Class I trail along Cathedral Oaks Road. These improvements would occur within the project site and have been evaluated as part of the overall grading, landscaping, and infrastructure improvements analyzed in this EIR. No off-site recreational facilities or expansions are proposed or required to serve the project. Therefore, the proposed project would not require the construction or expansion of recreational facilities beyond the recreational components of the proposed project evaluated throughout this EIR. This impact would be less than significant.

4.1 Aesthetics and Visual Resources

4.1.1 Setting

Aesthetic values are important aspects of a community in establishing its identity, sense of place, and quality of life. According to the City of Goleta General Plan/Coastal Land Use Plan, Goleta Valley is well known for the scenic beauty of its open spaces, foothills, and ocean and mountain views. Goleta lies between the Santa Ynez Mountains and the Pacific Ocean. Although the mountains are outside the city boundaries, these landforms remain largely undeveloped and provide a scenic backdrop to Goleta's urbanized area. Prominent features of the foothills and mountains are seen throughout the city and include expanses of orchards, chaparral, and rock outcroppings (City of Goleta 2006).

4.1.1.1 Project Site Visual Character

The project site encompasses approximately 14.38 net acres designated as Assessor's Parcel Number 077-530-019 in western Goleta at 7400 Cathedral Oaks Road. The existing site elevations range from 145 feet above mean sea level along Cathedral Oaks Road, sloping upward to the northeast corner of the property to 252 feet above mean seal level, with an average slope of 7.8 percent (refer to project site plans in Appendix B). The project site is currently a large fallow field with three small, vacant buildings including a single-family residence. Although designated for Agricultural use in the City of Goleta General Plan/Coastal Land Use Plan and zoned for agriculture, there is currently no agricultural activity occurring on the site, and the site has been fallowed since approximately 1995 (Appendix F). Dense trees and shrubs are present along the edges of the site and adjacent property. A few small trees are planted along Cathedral Oaks Road.

The site is characterized, in part, by the current use of woodchip and firewood storage, which is clearly visible from Cathedral Oaks Road and King Daniel Lane. A chain-link fence surrounds the property including along Cathedral Oaks Road, with a gate at the driveway entrance near the southwest corner of the site. The soil surface in the vacant portion of the site is uneven because most of the site has not been graded since diseased avocado trees were removed in 1995. The visual character of the project site is also defined by existing development on the site. There are three vacant buildings on the project site: a 2,015-square-foot residence, 726-square-foot garage, and 1,152-square-foot barn. The buildings are near the western edge of the property, along a driveway that extends northward from Cathedral Oaks Road approximately halfway up the west side of the property. The residence is bordered by front and back yards. Views of the buildings on the site are screened by dense trees and other vegetation, and are not visible from most offsite locations.

The open visual character of the project site contrasts with the surrounding land. To the north and east, Glen Annie Golf Course is screened by densely planted trees. The visual character of the golf course property from the project site appears as a dense, almost natural-appearing landscape. To the west, the multifamily residential property has a dense, urban visual character, with nearly contiguous residential buildings bordering Northgate Drive, above slopes and low hedges. Views from both the project site and the residences along Northgate Drive are obscured by tall, dense trees as part of El Encanto creek corridor. South of Cathedral Oaks Road, the single-family residential community has a suburban visual character, with relatively narrow and dense layers of landscaping and privacy walls, which partially screen views of the houses set closest to the roadway.

The project site offers limited scenic views of the Santa Ynez Mountains at points to the east and west of the project site. These views are limited due to intervening development, topography, and vegetation. Views of the foothills and mountains are available from Cathedral Oaks Road directly adjacent to the project site because there is limited vegetation and development on the majority of the site and topography slopes up gradually from the roadway. The project site does not provide views of the Pacific Ocean, shoreline, Goleta and Devereux Sloughs, or Lake Los Carneros, but does provide views of El Encanto Creek and its riparian corridor. The project site is not identified by the City as a location that serves as a public vantage point for viewing scenic resources (City of Goleta 2006).

4.1.1.2 Surrounding Uses

The project vicinity includes a mix of single-family and multifamily residential uses, open space, and recreational land uses. South of Cathedral Oaks Road, across from the project site, are single-family residences, with back and side yards facing the street behind landscaping and a perimeter wall. The landscaping and a privacy wall at these residences partially screen views of the project site, but do not fully block the views from second stories. The site is surrounded by the current Glen Annie Golf Course to the north and east; El Canto Creek, Northgate Road, and multi-family residential development to the west; and Cathedral Oaks Road and single-family residences to the south. Views of the site from surrounding residences are screened by the existing trees and vegetation along El Encanto Creek.

4.1.1.3 Scenic Corridor

Cathedral Oaks Road is identified as a scenic corridor in the City of Goleta General Plan/Coastal Land Use Plan (City of Goleta 2006). City of Goleta General Plan/Coastal Land Use Plan Policy VH 2 identifies corridors that pass through or provide visual access to areas of high scenic value. City of Goleta General Plan/Coastal Land Use Plan Policy VH 2.2 requires that the aesthetic qualities of scenic corridors be preserved through retention of the general character of significant natural features and views of the ocean, foothills, and mountainous areas. No other roadways in the immediate vicinity of the project site are identified by the City as scenic corridors or otherwise identified for high scenic value or significant natural features.

In the eastern portion of Goleta, Cathedral Oaks Road is almost entirely bordered by residential development. In the central part of Goleta (between Storke Road and Fairview Avenue), the corridor is bordered primarily by agriculture (citrus and avocados). In western Goleta, there is a combination of residential, recreational, agricultural, open space, and institutional (school) uses. Views of the foothills and Santa Ynez Mountains are available along much of Cathedral Oaks Road. Foothill and mountain views from the Cathedral Oaks Road Scenic Corridor are considered a significant visual resource.

4.1.1.4 Views of the Site

Figure 4.1-1, Figure 4.1-2, Figure 4.1-3, and Figure 4.1-4 show existing public views of the site from roadways in the vicinity including: Cathedral Oaks Road, King Daniel Lane, and Royal Linda Drive. As shown on Figure 4.1-1 and Figure 4.1-2, from the east and west on Cathedral Oaks Road, views of the foothills and mountains are screened by development, topography, and roadside vegetation. As shown on Figure 4.1-3 and Figure 4.1-4, looking east toward/through the project site, past landscaping and overgrown vegetation at the edge of the site, there are very limited views of the foothills and mountains beyond.

Figure 4.1-1 Existing View – Eastbound Cathedral Oaks Road (CO1)



Figure 4.1-2 Existing View – Westbound Cathedral Oaks Road (CO2)



Figure 4.1-3 Existing View – King Daniel Lane (KD1)



Figure 4.1-4 Existing View – Royal Linda Drive (RL1)



Private viewpoints from multifamily residences west of the site, beyond El Encanto Creek and Northgate Drive, are screened by the existing trees and vegetation along El Encanto Creek and the site is not visible. Additionally, viewpoints from the golf course on the west, north, and east side of the project site are mostly screened by landscaping and topography, but not fully blocked.

4.1.1.1 Existing Light and Glare Conditions

The existing residence, garage, and barn are vacant. As such, the existing site uses are not sources of nighttime illumination on the project site. Existing offsite sources of illumination include streetlights along Cathedral Oaks Road, residential properties bordering Cathedral Oaks Road to the west and south, and facility lighting from the Glen Annie Golf Course to east. Glen Annie Golf Course is located north of the project site, but the portion adjacent to the project site's northern boundary does not contain substantial sources of light. Headlights from vehicles on Cathedrals Oaks Road are also sources of light in the project vicinity.

4.1.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations pertaining to aesthetics and visual resources applicable to the project.

b. State Regulations

State Scenic Highway Program

The California Department of Transportation 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 city of Goleta (California Department of Transportation 2019).

c. Local Regulations

City of Goleta General Plan/Coastal Land Use Plan

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

- **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.

- **VH 1.2: Scenic Resources Map**. The Scenic Resources Map in Figure 6-1 identifies locations on public roads, trails, parks, open spaces, and beaches that serve as public vantage points for viewing scenic resources. Views from these locations shall be protected by minimizing any impairment that could result from new development.
- **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.
- **VH 1.5: Protection of Open Space Views.** Views of open space, including agricultural lands, from public areas shall be protected. View protection associated with development 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 impacts to these scenic resources, the following development practices shall be used, where appropriate:
  a. Limitations on the height and size of structures.
  b. Clustering of building sites and structures.
  c. Shared vehicular access to minimize curb cuts.
  d. Downcast, fully shielded, full cut off lighting of the minimum intensity needed for the purpose.
  e. Use of landscaping for screening purposes and/or minimizing view blockage as applicable.
  f. Selection of colors and materials that harmonize with the surrounding landscape

- **VH 1.6: Preservation of Natural Landforms**. Natural landforms shall be protected. Protection associated with development should be accomplished first through site selection to protect natural landforms and then by use of alternatives that enhance and incorporate natural landforms in the design. To minimize alteration of natural landforms and ensure that development is subordinate to surrounding natural features such as mature trees, native vegetation, drainage courses, prominent slopes, and bluffs, the following development practices shall be used, where appropriate:
  a. Limit grading for all development including structures, access roads, and driveways. Minimize the length of access roads and driveways and follow the natural contour of the land.
  b. Blend graded slopes with the natural topography.
  c. On slopes, step buildings to conform to site topography.
  d. Minimize use of retaining walls.
  e. Minimize vegetation clearance for fuel management.
  f. Cluster building sites and structures.
  g. Share vehicular access to minimize curb cuts.
- **VH 1.8: Private Views**. Project development and architecture shall be considerate of private views.
- **VH 2.1: Designated Scenic Corridors**. The Scenic Resources Map in Figure 6-1 identifies corridors that pass through, or provide visual access to, areas of high scenic value. These corridors, or segments of corridors, include but are not limited to the following:
  a. U.S. 101
  b. Cathedral Oaks Road
  c. Hollister Avenue
  d. Los Carneros Road
  e. Fairview Avenue
  f. Calle Real
- **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.
- **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.

- **VH 2.4: Public Improvements**. Public improvements visible from scenic corridors including landscaping, street lighting, signage, medians, noise attenuation walls, and other hardscape elements shall include a high level of design through appropriate detailing and use of high quality, durable materials.
- **VH 2.5: Linkages between Scenic Areas**. Corridors of high scenic value should be linked with adjacent public recreation areas such as parks and trails where feasible.
- **VH 3.3: Site Design**. The city's visual character shall be enhanced through appropriate site design. Site plans shall provide for buildings, structures, and uses that are subordinate to the natural topography, existing vegetation, and drainage courses; adequate landscaping; adequate vehicular circulation and parking; adequate pedestrian circulation; and provision and/or maintenance of solar access.
- **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.
- **VH 3.5: Pedestrian-Oriented Design**. The city's visual character shall be enhanced through provision of aesthetically pleasing pedestrian connections within and between neighborhoods, recreational facilities, shopping, workplaces, and other modes of transportation, including bicycles and transit.
- **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.

- **VH 4.10: Streetscape and Frontage Design**. A unified streetscape shall be created to improve the interface between pedestrians and vehicles. The following design elements shall be incorporated where feasible:
  a. Abundant street trees and landscaped medians.
  b. Landscaping that buffers pedestrians and bicyclists from traffic without creating site distance conflicts.
  c. Coordination of landscaping within the public right-of-way and adjacent development to provide an integrated street frontage.
  d. Provision of street furniture including benches, planter seating, trash containers, and pedestrian scale light fixtures.
  e. Use of pavement treatments and decorative tree wells.
  f. Accent planting, textured paving, and specimen trees used to establish identities at building entries.
  g. Traffic control and utility hardware such as backflow devices, traffic control cabinets, cable television boxes, and air vacuum and release enclosures shall be screened from view and colored to blend in with the surroundings. Such hardware should be placed outside sidewalks and away from intersections to the extent feasible.

- **VH 4.12: 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.

- **VH 4.14: Utilities**. New development projects shall be required to place new utility lines underground. Existing overhead utility lines should be placed underground when feasible. Undergrounding of utility hardware is encouraged. Any aboveground utility hardware, such as water meters, electrical transformers, or backflow devices, shall not inhibit line of sight or encroach into public walkways and, where feasible, should be screened from public view by methods including, but not limited to, appropriate paint color, landscaping, and/or walls.
- **VH 4.15: Site-Specific Visual Assessments**. The use of story poles, physical or software-based models, photo-realistic visual simulations, perspectives, photographs, or other tools shall be required, when appropriate, to evaluate the visual effects of proposed development and demonstrate visual compatibility and impacts on scenic views.

Goleta Inland Zoning Ordinance and Special Site Zoning Provisions

Project Site Zoning

The project site is zoned AG-40 (Agriculture II, 40-acre minimum lot size), which does not permit residential development proposed by the project applicant (City of Goleta 2025). However, there is

currently no agricultural activity occurring on the site, and the site has been fallowed since approximately 1995 (Appendix F). The proposed project is a qualified housing development project that utilizes the "Builder's Remedy" protections of the California Housing Accountability Act. Accordingly, pursuant to California Government Code section 65589.5(f)(6)(A), because there are no general plan designation or zoning classification that allow the density and unit type proposed by the applicant, the project applicant has identified the RS-7 zone district as the most analogous zone to the proposed project; therefore, RS-7 is used as a basis for consistency determination. Within the RS-7 zone district, the minimum lot area is 7,000 square feet. Components of the proposed project which deviate from the RS-7 zone would be evaluated consistently with California Density Bonus Law.

Chapter 17.26

Pursuant to Chapter 17.26, Coastal/Inland Visual Resource Preservation, of the Goleta Zoning Ordinance, significant inland visual resources include, but are not limited to, the Santa Ynez Mountains, the Pacific Ocean, and the Channel Islands. All development applications located on or adjacent to a scenic and visual resource area are required to submit materials that provide adequate information to identify existing and future public views and demonstrating how the project proposes to avoid potential significant negative impacts to protected public views, viewing areas, and scenic corridors. Furthermore, the Zoning Ordinance stipulates the following requirements for scenic views, natural landforms, and scenic corridors in the city:

- **Section 17.26.040 Scenic Views**. Proposed development must be designed to preserve existing public views of scenic resources to the maximum extent feasible. While potential impacts to private views will be considered during the Design Review process, they do not have the same protections that are afforded to those public viewing areas, including scenic views depicted in Figure 6-1 of the General Plan.
  - **A. Design of Development.** The Design Review Board will review the design of the proposed development, including the location of structures and uses on the lot, the size, bulk, scale, and height of the structure(s), and existing and proposed landscaping to ensure that public views are identified and protected. Design alternatives that enhance, rather than obstruct or degrade existing public views, may be requested.
  - **B. View Protection Development Standards.** To minimize impacts to public views and ensure visual compatibility of new development, the following development practices must be used, where applicable:
    1. Limitations on the height and width of structures where more than 10 percent of a protected public view would otherwise be impacted;
    2. Setbacks of ocean-fronting structures a distance sufficient to ensure that the structure does not infringe on views of the mountains from the beach;
    3. Limitations on the height and use of reflective materials for exterior walls, including retaining walls and fences;
    4. Clustering of building sites and structures;
    5. Shared vehicular access to minimize curb cuts;
    6. Use of appropriate landscaping for screening development but also minimizes impacts to public views of and from the ocean and mountains;
    7. Selection of colors and materials that harmonize with the surrounding landscape;
    8. Stepping of buildings so that the heights of building elements are lower near the street and increase with the distance from the public viewing area;

9. Limitations on removal of native vegetation; and
10. Revegetation of disturbed areas.

- **Section 17.26.050 Natural Landforms.** Proposed development on or adjacent to natural features, including but not limited mature trees, native vegetation, drainage courses, prominent slopes, and bluffs, must be designed and sited to prevent adverse impacts on the visual quality of these resources as viewed from public streets and publicly accessible areas on public or private property.
  - **A. Design of Development.** The Design Review Board will review the design of the proposed development, including the location of structures and uses on the lot, the size, bulk, scale, and height of the structure(s), and existing and proposed landscaping to ensure that natural landforms are identified and protected. Design alternatives that enhance, rather than obstruct or degrade natural landforms, may be requested.
  - **B. Natural Landform Development Standards.** To minimize alteration of natural landforms and ensure that development is subordinate to surrounding natural features, the following development practices shall be used, where appropriate:
    1. Limit grading for all development including structures, access roads, and driveways. Minimize the length of access roads and driveways and follow the natural contour of the land;
    2. Blend graded slopes with the natural topography;
    3. On slopes, step buildings to conform to site topography;
    4. Minimize use of retaining walls;
    5. Minimize vegetation clearance for fuel management;
    6. Cluster building sites and structures; and
    7. Share vehicular access to minimize curb cuts.

- **Section 17.26.060 Scenic Corridors.** Proposed development must be designed to preserve scenic corridors, as depicted in Figure 6-1 of the City's General Plan.
  - **A. Design of Development.** The Design Review Board will review the design of the proposed development, including the location of structures and uses on the lot, the size, bulk, scale, and height of the structure(s), and existing and proposed landscaping to ensure that 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. Design alternatives that enhance, rather than obstruct or degrade existing scenic corridors, may be requested.
  - **B. Scenic Corridor Development Standards.** To minimize impacts to scenic corridors and ensure visual compatibility of new development, the following development practices must be used, where applicable:
    1. Incorporate natural features in design;
    2. Use landscaping for screening purposes and/or for minimizing view blockage as applicable;
    3. Minimize vegetation removal;
    4. Limit the height and size of structures;
    5. Cluster building sites and structures;

6. Limit grading for development including structures, access roads, and driveways;
7. Minimize the length of access roads and driveways and follow the natural contour of the land;
8. Preserve historical structures or sites;
9. Plant and preserve trees;
10. Minimize use of signage;
11. Provide site-specific visual assessments, including use of story poles;
12. Provide a similar level of architectural detail on all elevations visible from scenic corridors;
13. Place existing overhead utilities and all new utilities underground; and
14. 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.

4.1.3 Impact Analysis

4.1.3.1 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. The assessment of a project's aesthetic impacts is inherently subject to personal and cultural interpretation; to ensure objectivity, this analysis uses the County's 2024 *Environmental Thresholds and Guidelines Manual* to direct the assessment of aesthetic impacts.

Consistent with the County's 2024 *Environmental Thresholds and Guidelines Manual,* the assessment of aesthetic impacts includes an evaluation of a project's impact to visual resources on the project site, visual resources in areas surrounding the project site, and public views that include the project site, including the physical attributes of the project site, its relative visibility, and its relative uniqueness. This analysis includes a determination of compliance with local policies that pertain to visual resources, including policies related to Scenic Corridor designations.

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines, which provides the following to determine if a project would have a potentially significant impact on aesthetics and visual resources. Would the project:

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 which would adversely affect day or nighttime views in the area.

The County's 2024 *Environmental Thresholds and Guidelines Manual* does not include specific significance thresholds for aesthetics; however, it offers guidance for the methodology of assessing visual impacts, as summarized in the above subsection, *Methodology*.

4.1.3.2 Project Impacts and Mitigation Measures

Threshold 1: Have a substantial adverse effect on a scenic vista?

Impact AES-1 WHILE THE PROPOSED PROJECT WOULD RESULT IN SOME CHANGES TO EXISTING VIEWS, THE DESIGN OF THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL, ADVERSE CHANGES TO IDENTIFIED SCENIC CORRIDORS OR RESOURCES FROM PUBLIC VIEWPOINTS IN THE PROJECT VICINITY. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The project site is primarily visible from Cathedral Oaks Road, Royal Linda Drive, and King Daniel Lane, as well as from residences in the neighborhood south of Cathedral Oaks Road. Limited views of the site are also available from the Glen Annie Golf Course, which is partially screened by intervening topography and vegetation.

Cathedral Oaks Road is identified as a Scenic Corridor in the City of Goleta General Plan/Coastal Land Use Plan, which identifies the project area of the corridor as having views in all directions. As such, foothill and mountain views from the Cathedral Oaks Road Scenic Corridor are considered a significant visual resource. Scenic views of the Santa Ynez Mountains are limited at points to the east and west of the project site due to intervening development, topography, and vegetation. Views of the foothills and mountains are available from Cathedral Oaks Road directly adjacent to the project site because there is limited vegetation and development on the majority of the site and topography slopes up gradually from the roadway.

Project construction would involve grading to prepare the site for residential lots, open space areas, internal roadways, and other infrastructure. Once operational, the project would include residential units consisting of five dwelling types ranging in size from a single-story, 1,765-square-foot floor plan to a two-story, 3,870-square-foot floor plan. The typical roof height would range from 17 feet 9 inches for single-story residences to 23 feet 10 inches for two-story residences. The individual lot size would range from approximately 7,000 gross square feet to approximately 19,500 gross square feet. The net area of the individual lots, as measured behind the sidewalks, ranges from 5,905 square feet to 13,076 square feet. Landscaping would be comprised of an assortment of native and non-invasive screen shrubs, accent trees, and canopy trees, with a plant palette suitable for the climate in Goleta. The landscape buffer along Cathedral Oaks Road would be approximately 50 feet wide (refer to Landscaping Plans in Appendix B). Interior block walls between individual lots and a perimeter block wall surrounding the development would be 6 feet in height. The proposed residences are designed with architectural styles and building colors consistent with surrounding residences and the natural environment. The discussion below evaluates the potential for the proposed project to substantially obstruct or adversely alter existing views from public viewpoints (adjacent roadways).

View from Eastbound Cathedral Oaks Road

Figure 4.1-1 illustrates views toward the project site from eastbound Cathedral Oaks Road with the project. When traveling east on Cathedral Oaks Road toward and along the project site, under existing conditions, the Santa Ynez Mountains are only partially and distantly visible from the roadway, but mostly blocked by intervening topography and vegetation. Project construction may temporarily introduce materials and equipment to the site that are visible in views of and through the site.

However, construction equipment used on the project site would not be of substantial size or massing such that substantial interference of views of the foothills and mountains would occur. Changes in views during project construction would fluctuate, depending on the portion of the site being developed at any given time, and would be temporary during the construction phase. Once the site is developed with the project, the visual simulation (CO1) shows that the limited views of the mountains would be screened by new rooflines and vegetation and no longer distantly visible from this perspective.

View from Westbound Cathedral Oaks Road

Figure 4.1-2 illustrates views toward the project site from westbound Cathedral Oaks Road with the project. When traveling west on Cathedral Oaks Road toward and along the project site, under existing conditions, there are no views of the Santa Ynez Mountains due to intervening topography and vegetation and because the mountains curve to the north. Project construction may temporarily introduce materials and equipment to the site that are visible in views of and through the site. However, construction equipment used on the project site would not be of substantial size or massing such that substantial interference of views of the foothills and mountains would occur. Changes in views during project construction would fluctuate, depending on the portion of the site being developed at any given time, and would be temporary to the construction phase. Once the site is developed with the project, the visual simulation shows (CO2) that rooflines and taller vegetation would be visible on-site. The project would not change views of the mountains or foothills from this perspective.

Views from King Daniel Lane and Royal Linda Drive

Figure 4.1-3 and Figure 4.1-8 illustrate views from the intersecting King Daniel Lane and Royal Linda Drive, respectively, across Cathedral Oaks Road toward the project site. From this perspective, views of the Santa Ynez foothills and mountains are limited and largely blocked by landscaping and overgrown vegetation along Cathedral Oaks Road. With the project, views through the site would be altered to include the paved site entrance and new fencing, single-family residences, and additional vegetative screening, once matured.

Project construction may temporarily introduce materials and equipment to the site that are visible in views of and through the site. However, construction equipment used on the project site would not be of substantial size or massing such that substantial interference of views of the foothills and mountains would occur. Changes in views during project construction would fluctuate, depending on the portion of the site being developed at any given time, and would be temporary during the construction phase. During construction, the project applicant would be required to demonstrate that the project complies with the grading limitations.

Once developed and prior to occupancy, the project would be required to comply with height limitations established with the approved entitlement plans and finished floor elevations of each lot are consistent with the finished floor elevation shown on the Vesting Tentative Tract Map #32,046 and Final Development Plan dated July 31, 2025. As shown in the visual simulations (KD1 and RL1) in Figure 4.1-7 and Figure 4.1-8, landscaping and rooflines would screen the existing, limited views of the foothills and mountains from King Daniel Lane. Partial, limited views of the mountains would be retained from Royal Linda Drive with the project. Thus, while the project would result in some obstruction of existing views, these views are already very limited, only experienced for brief periods while vehicles brake before turning onto Cathedral Oaks Road, and are not identified by the City as designated scenic corridors or scenic resources as shown on Figure 6-1 of the General Plan (Scenic

and Visual Resources). Although the proposed project design would result in changes to views from King Daniel Lane, views of and through the site would consist primarily of on-site landscaping/vegetation, once matured. Therefore, the project would not result in substantial, adverse changes to views of the mountains or foothills from the perspective of intervening roadways south of the site.

Conclusion

While the proposed project would result in some changes to existing views, the design of the proposed project would not result in substantial, adverse changes to identified scenic corridors or resources from public viewpoints in the project vicinity. The overall aesthetic nature of the site with the project would be dominated by landscaping and vegetation on the site, once matured, and would be cohesive with the size and design features (i.e., architectural styles and building colors) of other residential development in the vicinity. Views of the site would remain dominated by landscaping and vegetation and views of the surrounding foothills and mountains would continue to be available to the public in a limited manner from intersecting public roadways. Therefore, the proposed project would have a less than significant impact related to adverse effects on scenic vistas and the aesthetic nature thereof.

Mitigation Measures

No mitigation is required.

Figure 4.1-5 Proposed View – Eastbound Cathedral Oaks Road (CO1)



Figure 4.1-6 Proposed View – Westbound Cathedral Oaks Road (CO2)



Figure 4.1-7 Proposed View – King Daniel Lane (KD1)



Figure 4.1-8 Proposed View – Royal Linda Drive (RL1)



Threshold 2:	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 NOT VISIBLE FROM A STATE SCENIC HIGHWAY AND, THEREFORE, WOULD NOT SUBSTANTIALLY DAMAGE SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY. NO IMPACT WOULD OCCUR.

The project would not be within, nor would it affect any views from, a State Scenic Highway as designated by the State of California. As such, the project would not damage scenic resources within a state scenic highway. No impact would occur.

Mitigation Measures

No mitigation is required.

Threshold 3:	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 BE CONSISTENT WITH APPLICABLE ZONING AND OTHER REGULATIONS THAT GOVERN SCENIC QUALITY, INCLUDING THE CITY OF GOLETA GENERAL PLAN/COASTAL LAND USE PLAN AND GOLETA ZONING CODE. IMPACTS WOULD BE CLASS III, *less than significant*.

Pursuant to Public Resources Code Section 21071, the City of Goleta is in an urbanized area because Goleta and the contiguous city of Santa Barbara have a combined population of at least 100,000 people. Given that the proposed project would facilitate redevelopment in an urbanized area, the impact discussion of visual character and views is focused on consistency with applicable zoning and other regulations governing scenic quality. An expanded discussion of the proposed project's consistency with City of Goleta General Plan/Coastal Land Use Plan policies is provided in Section 4.9, *Land Use and Planning*.

The project would involve demolition of an existing residence, garage, and barn; subdivision of the project site into residential and open space lots; development of single-family residential units on each residential lot; and open space containing landscaping with native vegetation throughout the project site. The following subsections describe the project's consistency with applicable zoning and other regulations that govern scenic quality.

City of Goleta General Plan/Coastal Land Use Plan

The project would be consistent with the City of Goleta General Plan/Coastal Land Use Plan policies related to scenic quality and character including Policies VH 3.3, Site Design; VH 3.4, Building Design; VH 3.5, Pedestrian-Oriented Design; VH 4.9, Landscape Design; VH 4.10, Streetscape and Frontage Design; VH 4.11, Parking Lots; VH 4.12, Lighting; VH 4.14, Utilities; and VH 4.16, Green Building; as the proposed project would implement green building practices and appropriate landscaping in all proposed development, including the residences, associated parking lots, internal roadways, and open space areas. As described in Section 2.3.7, *Demolition and Grading,* of Chapter 2, *Project Description,* the finished grade elevation of the project site would range from approximately 150 feet above mean sea level to approximately 245 feet above mean sea level, in conformance with the

natural varying topography of the surrounding area. Existing vegetation would be maintained, as feasible, and no tree removal would occur. Landscaping would be comprised of an assortment of native and non-invasive screen shrubs, accent trees, and canopy trees to promote the natural landscape of the project area. The proposed project's internal circulation design would provide sidewalks for pedestrian travel and include extension of an existing Class I trail adjacent to Cathedral Oaks Road that would expand pedestrian circulation infrastructure. As stated in Section 4.0.3.2, *Energy,* of Chapter 4, *Environmental Impact Analysis*, the proposed design of the residences would include solar photovoltaic systems pursuant to the requirements of California Building Code Title 24, Part 6. As stated in Section 4.1, *Aesthetics and Visual Resources*, the proposed project's exterior lighting would consist of downward directed fixtures. Proposed project lighting would be designed and shielded in accordance with City standards. Exterior lighting used at night (i.e. roadway lighting) would be dimmed after 11:00 p.m. to the maximum extent practical without compromising public safety. All exterior lighting in common areas and on individual parcels would be designed to meet the City's "dark sky" and low energy use requirements and would conform to the architectural scale of the residential neighborhood. The proposed project would underground all utilities, and no aboveground utilities are proposed.

Goleta Zoning Code

As discussed in the Local Regulations section, the project site is zoned Agriculture, with an RS-7 (Single Family Residential, 7,000 square foot lot minimum) zoning utilized for consistency evaluation herein. As the proposed development of the project site would consist of residential uses on lots 7,000 square feet or greater, the proposed project would be permitted under the RS-7 zoning. The proposed project would be required to comply with development regulations pursuant to Section 17.07.040 of the City's Zoning Code. As discussed in detail under Impact LU-2 in Section 4.10, *Land Use and Planning*, the proposed project would meet the development standards, including maximum lot coverage, maximum building height, minimum setbacks, and parking, of the RS-7 zone. The proposed maximum height of 24 feet would be similar to adjacent residential uses and visual impacts would be minimized due to the presence of open space and vegetation surrounding and within the site.

In summary, the proposed project would be consistent with applicable zoning and other regulations that govern scenic quality. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 4:	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. COMPLIANCE WITH THE CITY'S EXTERIOR NIGHT LIGHTING AND SPILLOVER RESTRICTIONS WOULD ENSURE THAT LIGHT OR GLARE WOULD NOT ADVERSELY AFFECT VIEWS IN THE AREA. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT.*

Project operation would involve residential use of the project site, which is typically minimal during nighttime hours when humans are typically indoors resulting in minimal new sources of nighttime illumination on the project site, limited to exterior lights on residences and streetlights. Existing offsite sources of illumination include streetlights along Cathedral Oaks Road, residential properties bordering Cathedral Oaks Road to the west and south, and facility lighting from the Glen Annie Golf

Course to east. Headlights from vehicles on Cathedrals Oaks Road are also sources of light in the project vicinity.

Proposed project construction is not anticipated to occur during evening or nighttime hours in accordance with Section 17.39.070 of the City's Zoning Code and due to surrounding residential uses within 1,600 feet of the site, which limits construction activities from Monday to Friday, 8:00 a.m. to 5:00 p.m. Thus, the proposed project would not introduce new light sources to the project site during construction. Any new light sources would be related to the new residences, roadways, and parking areas (e.g., driveways) as needed. Consequently, the following discussion focuses on the proposed project's operational impact involving light and glare.

The project would introduce new stationary sources of light and glare on the project site through development of residential uses with driveways and internal roadways with streetlights. Exterior night lighting, including street lighting, could result in the exposure of adjoining areas to excessive light and glare if such lighting is not properly shielded and directed away from neighboring land uses, or if the light fixtures are excessively tall, creating a situation where appropriate light shielding is not possible. In addition, if appropriate dark-sky lighting fixtures are not incorporated and properly installed, project lighting could increase lighting of the night sky, which could result in a substantial adverse effect to nighttime views in the area.

The primary method by which the City ensures appropriate reduction of light and glare impacts is the City of Goleta General Plan/Coastal Land Use Plan Policy VH 4.12 requirement for dark sky compliant lighting fixtures for exterior lighting. The City requires that exterior night lighting is of low intensity, low-glare design, and hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent parcels. All exterior lighting would be required to meet the City's Title 17 Chapter 17.35 Zoning Ordinance, which provides exterior night lighting and dark sky requirements designed to reduce impacts to wildlife. Exterior lighting fixtures also must be kept to the minimum number and intensity needed to ensure public safety. Lights must be dimmed after 11:00 p.m. to the maximum extent practical without compromising public safety. Upward-directed exterior lighting is prohibited. All exterior lighting fixtures must be appropriate for the architectural style of the structure and surrounding area. All night/ambient lighting on streets and homes along the western boundary of the project site (adjacent to El Encanto Creek) must be directed away from the creek in accordance with City of Goleta General Plan/Coastal Land Use Plan Policy VH 4.12(a). Compliance with City lighting requirements and specifications, including the submittal of a photometric plan prepared by a licensed engineer as well as lighting cut sheets, would ensure that potential light spillover impacts are less than significant.

Moving sources of light would include headlights of vehicles driving on roadways near the project site, such as Cathedral Oaks Road, and entering or exiting the project site at night. While operation of the project would involve vehicle travel, and thus potential light from vehicles, these lighting sources would be similar to existing conditions surrounding the project site, as residential and recreational vehicles are frequent in the area, given the site's proximity to Cathedral Oaks Road and the Glenn Annie Golf Course.

The project would introduce new sources of glare in the form of focused, intense light from sunlight reflecting on the glass surfaces of the residences and amenities, as well as from parked car windows within the new parking areas and internal roadways. However, vegetative screening in the open space areas and perimeter walls around the development would reduce off-site impacts of glare from both the proposed structures and parked cars. Thus, the potential for glare-related impacts would be limited and less than significant.

Mitigation Measures

No mitigation is required.

4.1.4 Cumulative Impacts

The geographic scope for cumulative impacts to aesthetics consists of Cathedral Oaks Road, residential properties bordering Cathedral Oaks Road to the west and south, and Glen Annie Golf Course to the north and east. This geographic scope is appropriate because changes in views from scenic viewpoints and potential lighting or glare associated with cumulative development in this area could collectively contribute to a cumulative impact in the proposed project's vicinity, including views of the foothill and mountains in the Santa Ynez Mountains. As identified in Table 3-1 of Chapter 3, *Related Projects*, the only City project within this distance is the Annual Pavement Rehabilitation Project and Pavement Management Program. In addition, while not within the City of Goleta, the Santa Barbara County Board of Supervisors approved a rezone of the Glen Annie Golf Course for the development of 800 to 1,000 residential units as part of the County's 2023-2031 Housing Element Update (County of Santa Barbara 2025a). Given the proximity to the project site, this potential residential development is included. Therefore, cumulative impacts are analyzed against these projects. The general approach to cumulative impact analysis used in this EIR is discussed in Chapter 3, *Related Projects*.

There are no officially designated State Scenic Highways in Goleta; therefore, a discussion of cumulative impacts related to State Scenic Highways is not provided herein.

The Annual Pavement Rehabilitation Project and Pavement Management Program on Cathedral Oaks Road would consist of temporary construction activities associated with roadway rehabilitation. The Annual Pavement Rehabilitation Project and Pavement Management Program does not include the construction of buildings or other structures that could further obstruct already limited views of the scenic Santa Ynez mountains and foothills. The redevelopment of the Glen Annie Golf Course property into a residential development would serve as an extension of the existing residential development in the vicinity. This would increase the overall developed condition of the area, adding structural development at the base of the Santa Ynez foothills and mountains, potentially decreasing scenic views in the Cathedral Oaks Scenic Corridor. As a result, cumulative development could result in a significant cumulative impact on scenic vistas. As discussed in the project-specific analysis above, project construction would be fluctuating and temporary as it relates to visual impacts. Construction equipment used on the project site would not be of substantial size or massing such that substantial interference of views of the foothills and mountains would occur. Accordingly, proposed project construction would result in less than significant impacts to aesthetics and scenic resources. Once operational, the project would alter the aesthetic nature and views of/through the project site. However, as designed, aesthetic impacts and impacts to scenic views would be similar to surrounding development, continue to offer limited public views to the Santa Ynez foothills and mountains, and not substantially different than the existing condition. As such, the project would not result in a considerable contribution to cumulative impacts.

Cumulative development in Goleta, including the project, would be required to comply with the applicable policies and regulations relating to scenic views/resources and aesthetics in the City of Goleta General Plan/Coastal Land Use Plan and Goleta Zoning Code. County projects would similarly be subject to County of Santa Barbara policies and regulations governing aesthetics and visual resources. As such, cumulative impacts related to compliance with applicable zoning and other regulations governing scenic quality would be less than significant.

Cumulative development would contribute to an increase in light and glare throughout Goleta. However, future projects, including the 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). Implementation of City lighting regulations would ensure that cumulative impacts involving light and glare 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. This section is based, in part, on the *CalEEMod Memorandum for the Shelby Property Residential Project* (Appendix C).

4.2.1 Setting

The project site is located on the City's coastal plain. The climate in and around Goleta, as in most of the central coast of California, is dominated by the strength and position of the semi-permanent high-pressure center over the Pacific Ocean near Hawaii. It creates cool summers, mild winters, and rainfall. It drives the cool daytime sea breeze, and it maintains a comfortable humidity range and ample sunshine after the frequent morning clouds dissipate. However, the same atmospheric processes that create the desirable living climate combine to restrict the ability of the atmosphere to disperse the air pollution generated by the population attracted in part by the desirable climate.

Temperatures in the Goleta area average 69.3 degrees Fahrenheit (°F) (Western Regional Climate Center 2016). Daily and seasonal oscillations of mean temperature are small because of the moderating effects of the nearby oceanic thermal reservoir. In contrast to the steady temperature regime, rainfall is highly variable. Measurable precipitation occurs mainly from early November to mid-April, but total amounts are generally small. Goleta averages 16 inches of rain annually, with January being the wettest month (Western Regional Climate Center 2016). Winds through the project site display several characteristic regimes. During the day, especially in summer, winds are typically from the south in the morning and from the west in the afternoon. Daytime wind speeds are 5 to 10 miles per hour on average. At night, especially in winter, the land becomes cooler than the ocean, and an offshore wind of 3 to 5 mph typically develops (Weather Underground 2025). Early morning winds are briefly from the southeast parallel to the coastline before the daytime onshore flow becomes well established again. One other important wind regime occurs when high pressure builds over the western United States and creates hot, dry, and gusty Santa Ana winds from the north and northeast across Santa Barbara County.

Local wind patterns carry air emissions offshore at night and toward inland Santa Barbara County during the day. Low nighttime wind speeds limit the dispersion of pollutants. As inland Santa Barbara County is mainly comprised of open space with sparse development, stagnant air pollutant emissions within inland Santa Barabara County typically does not present substantial air quality hazards.

Temperature inversions (warmer air on top of cooler air) are 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.

4.2.1.1 Sensitive Receptors

Sensitive receptors are generally defined as locations where pollutant-sensitive members of the population may reside or where the presence of air pollutant emissions could adversely affect use of the land. Sensitive members of the population include those who may be more negatively affected by poor air quality than other members of the population, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. In general, residential areas, hospitals, daycare facilities, elder-care facilities,

elementary schools, and parks typically contain a high concentration of these sensitive population groups. Within the vicinity of the project site are residences located approximately 200 feet to the west and 65 feet to the south. The closest school is South Coast Montessori School, which is located approximately 0.2-mile south of the project site. Other nearby schools include the Evergreen Learning Center and Brandon School at approximately 0.4-mile-southwest of the project site and Dos Pueblos High School approximately 0.3-mile southeast of the project site.

4.2.1.2 Existing Air Quality

The project site is in the South Central Coast Air Basin (SCCAB). The SCCAB encompasses San Luis Obispo, Santa Barbara, and Ventura Counties. The project site is in Santa Barbara County. The California Air Resources Board (CARB) and the Santa Barbara County Air Pollution Control District (SBCAPCD) operate ambient air monitoring stations that measure pollutant concentrations throughout Santa Barbara County and the SCCAB. The nearest monitoring station to the project site is the Goleta-Fairview station at 380 North Fairview Avenue located approximately 3.2 miles east of the project site. The Goleta-Fairview station monitors ozone (O_3), inhalable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$). The nearest monitoring site that collects nitrogen oxide (NO_2) and carbon monoxide (CO) data is approximately 9.1 miles northwest of the project site at the Las Flores Canyon #1 station. Table 4.2-1 summarizes the last 3 years of published data from these monitoring stations (CARB 2025a; CARB 2025b). As shown therein, there was one exceedance of California Ambient Air Quality Standards (CAAQS) for PM_{10} between 2022 and 2024. No other exceedances of air quality emissions occurred between 2022 and 2024. Sources and health effects of criteria air pollutants are summarized in Table 4.2-2.

Table 4.2-1 Summary of Air Quality Data

Pollutant[1]	2022	2023	2024
Ozone (ppm), Worst Hour[2]	0.070	0.055	0.061
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[2]	0.059	0.051	0.054
Number of days of state and federal exceedances (>0.07 ppm)	0	0	0
NO_2 (ppm), Worst Hour[3]	0.012	0.010	0.011
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 Average[3]	0.063	0.058	0.036
Number of days above CAAQS or NAAQS (>9.0 ppm)	0	0	0
PM_{10} (µg/ m^3), Worst 24 Hours[2]	50.6	43.7	43.9
Number of days of state exceedances (>50 µg/ m^3)	1	0	0
Number of days of federal exceedances (>150 µg/ m^3)	0	0	0
$PM_{2.5}$ (µg/ m^3), Worst 24 Hours[2]	15.4	22.8	15.9
Number of days of federal exceedances (>35 µg/m^3)	0	0	0

ppm= parts per million, ppb= parts per billion, µg/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] No monitoring stations within the vicinity of Goleta monitor for lead, and as such lead measurements are omitted from this table.

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

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

Source: CARB 2025a, 2025b

Table 4.2-2 Source and Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O_3)	Formed when reactive organic gases (ROG) and nitrogen oxides react in the presence of sunlight. ROG sources include any source that burns fuels, (e.g., gasoline, natural gas, wood, oil) solvents, petroleum processing and storage and pesticides.	Coughing and a sore or scratch throat; difficulty to breathe deeply and vigorously and cause pain when taking a deep breath; inflammation and damage to the airways; make the lungs more susceptible to infection; and aggravate lung diseases such as asthma, emphysema, and chronic bronchitis.
Respirable Particulate Matter (PM_{10})	Road dust, windblown dust (Agriculture) and construction (Fireplaces) Also formed from other pollutants (acid rain, nitrous oxide (No_x), SO_x, organics). Incomplete combustion of any fuel.	Increased respiratory disease, lung damage, cancer, premature death, reduced visibility and surface soiling
Fine Particulate Matter ($PM_{2.5}$)	Fuel combustion in motor vehicles, equipment and industrial sources, and residential and agricultural burning. Also formed from reaction of other pollutants (acid rain, NO_x, SO_x, organics).	Increased respiratory disease, lung damage, cancer, premature death, reduced visibility and surface soiling
Carbon Monoxide (CO)	Any source that burns fuel such as automobiles, trucks, heavy construction equipment, farming equipment and residential heating.	Chest pain in heart patients, headaches and reduced mental alertness
Nitrogen Dioxide (NO_2)	See carbon monoxide	Lung irritation and damage. Reacts in the atmosphere to form ozone and acid rain
Lead (Pb)	Metal Smelters, Resource Recovery, Leaded Gasoline, Deterioration of Lead Paint	Learning disabilities, brain and kidney damage
Sulfur Dioxide (SO_2)	Coal or Oil Burning Power Plants and Industries, Refineries, Diesel Engines	Increases lung disease and breathing problems for asthmatics. Reacts in the atmosphere to form acid rain.
Visibility Reducing Particles	See $PM_{2.5}$	Reduces visibility (e.g., obscures mountains and other scenery), reduced airport safety, lower real estate value, and discourages tourism.
Sulfates	Produced by the reaction in the air of SO_2 (see SO_2 sources), a component of acid rain.	Breathing difficulties, aggravates asthma and reduced visibility
Hydrogen Sulfide	Geothermal Power Plants, Petroleum Production and Refining, Sewer Gas	Nuisance odor (rotten egg smell), headache, and breathing difficulties (higher concentrations).

Source: United States Environmental Protection Agency (USEPA) 2025; CARB 2025c, 2025d, 2025e

4.2.2 Regulatory Setting

a. Federal Regulations

Federal Clean Air Act

The Federal Clean Air Act (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 Federal CAA [42 USC 7409], USEPA developed primary and secondary National Ambient Air Quality Standards (NAAQS) for six criteria pollutants: O_3, CO, NO_2, SO_2, particulate matter ($PM_{2.5}$ and PM_{10}), and lead.

The primary NAAQS "In the judgment of the Administrator[1], 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)]. USEPA 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. NAAQS currently in effect are shown in Table 4.2-3.

Table 4.2-3 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)	20.0 ppm (1-hr avg)
	9.0 ppm (8-hr avg)	9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.100 ppm (1-hr avg)	0.18 ppm (1-hr avg)
	0.053 ppm (annual avg)	0.030 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg)	0.25 ppm (1-hr avg)
	0.5 ppm (3-hr avg)	0.04 ppm (24-hr avg)
	0.14 ppm (24-hr avg)	
	0.030 ppm (annual avg)	
Lead	0.15 μg/m^3 (rolling 3-month avg)	1.5 μg/m^3 (30-day avg)
	1.5 μg/m^3 (calendar quarter)	
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)	12 μg/m^3 (annual avg)
	9 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 2024

[1] "Administrator" refers to the Administrator of USEPA.

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. 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 (SBCAPCD 2025).

United States Environmental Protection Agency Emissions Standards

USEPA has adopted multiple tiers of emissions standards for stationary engines. In 2004, USEPA finalized Tier 4 emission standards for nonroad diesel engines and sulfur reductions in nonroad diesel fuel (40 Code of Federal Regulations Parts 9, 69, 80, 86, 89, 94, 1039, 1048, 1051, 1065, and 1068). Tier 4 standards require advanced emission control technologies such as the use of diesel particulate filters and exhaust gas recirculation in order to reduce air pollutant emissions. Through the implementation of Tier 4 standards, exhaust emission from nonroad diesel engines decrease by approximately 90 percent (USEPA 2004).

b. State Regulations

California Clean Air Act

The California CAA was enacted in 1988 (California Health & Safety Code Section 39000 et seq.). Under the California CAA, 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 California CAA classifies specific geographic areas as either "attainment" or "nonattainment" areas for each pollutant, based on the comparison of measured data within the CAAQS. Santa Barbara County is currently classified as a nonattainment area under the CAAQS for O_3 and nonattainment-transitional[2] under the CAAQS for PM_{10} (SBCAPCD 2025).

State Implementation Plan

The SIP is a collection of documents that set forth the state's strategies for achieving ambient air quality standards. 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 USEPA 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.

[2] The nonattainment transitional designation is a subset of the nonattainment category, This designation is given to areas with some instances of an air pollutant exceedance, but which have made progress to attaining the CAAQS for that particular criteria air pollutant.

The SBCAPCD 2022 Ozone Plan is the SIP for Santa Barbara County. The 2022 Ozone Plan 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.

c. Local Regulations

Santa Barbara County Air Pollution Control District

As the local air quality management agency, 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 Table 4.2-2 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 only addresses the state O_3 standards because SBCAPCD is designated "attainment-unclassifiable" for the federal 8-hour O_3 standards, including the most recent standard of 0.070 ppm promulgated by USEPA in 2015.

To minimize potential impacts from project emissions, 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 SBCAPCD. Rule 323.1 limits the volatile organic content to 50 grams per liter for flat coatings and 100 grams per liter for non-flat coatings and traffic marking coatings.
- **Rule 329 (Cutback and Emulsified Asphalt Paving Materials).** This rule establishes reactive organic compound (ROC) limitations for cutback asphalt materials that are sold and used for paving, parking lots, driveways, streets, or highways.

City of Goleta General Plan/Coastal Land Use Plan

The City of Goleta's General Plan/Coastal Land Use Plan Conservation Element includes goals and policies to preserve air quality. Goals and policies that are applicable to the proposed project include:

- **CE 12.2 Control of Air Emissions from New Development:** The following shall apply to reduction of air emissions from new development:
  - 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.
  - 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.
  - Adequate buffers between new sources and sensitive receptors shall be required.
  - 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:
  - Watering active construction areas to reduce windborne emissions.
  - Covering trucks hauling soil, sand, and other loose materials.
  - Paving or applying nontoxic solid stabilizers on unpaved access roads and temporary parking areas.
  - Hydroseeding inactive construction areas.
  - Enclosing or covering open material stockpiles.
  - Revegetating graded areas immediately upon completion of work.

4.2.3 Impact Analysis

4.2.3.1 Methodology and Significance Thresholds

Methodology

This analysis is based on the *CalEEMod Memorandum for the Shelby Property Residential Project* (Appendix C). As detailed therein, emissions from construction and operation of the proposed project were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022. Construction was assumed to last 18 months, starting in January 2027 and ending in June 2028. Operational emissions were assumed to begin in 2028 following the completion of construction. Full model assumptions are included in Appendix C.

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on air quality. Would the project:

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

The County's 2024 *Environmental Thresholds and Guidelines Manual* does not 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 SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (SBCAPCD 2022), construction-related emissions should be quantified and compared to a 25 tons per year threshold for ROC or NO_X to determine if construction could result in a cumulatively considerable net increase in criteria pollutants for which the region is in non-attainment. 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 these thresholds.

Operation

The County's 2024 *Environmental Thresholds and Guidelines Manual* includes operational thresholds of significance for potential impacts related to air quality. As described therein, a project would have a significant air quality effect, individually or cumulatively, on the environment if its 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.

SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* states 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 (SBCAPCD 2022). As such, CO hotspot analyses are not required.

4.2.3.2 Project Impacts and Mitigation Measures

Threshold 1:	Conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 THE PROPOSED PROJECT'S RESIDENTIAL DEVELOPMENT WOULD FACILITATE A POPULATION INCREASE OF APPROXIMATELY 145 PEOPLE, WHICH WOULD NOT RESULT IN A POPULATION EXCEEDING THE GROWTH FORECASTS USED WITHIN THE APPLICABLE AIR QUALITY MANAGEMENT PLAN. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

As stated in Section 4.2.2(b), the applicable Air Quality Management Plan for the project site is the SBCAPCD 2022 Ozone Plan. 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 (SBCAPCD 2022). 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; SBCAPCD 2022). SBCAG generates population projections based on local General Plans. In this case, SBCAG utilized population projections contained in the City of Goleta General Plan/Coastal Land Use Plan, which are based on existing and anticipated land uses in the City. The 2022 Ozone Plan is also based on countywide employment data provided by the California Department of Finance (DOF). 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 are shown in Table 4.2-4.

Table 4.2-4 SBCAG Population Projections for Goleta

Year	Population Forecast
2030	33,100
2035	33,700
2040	34,300
2045	34,500
2050	34,700

Source SBCAG 2019

According to the DOF's population estimates for Goleta, Goleta has a current population of approximately 32,747 people (DOF 2025). Based on the City's average 2.59 persons per household (DOF 2025), the proposed project would result in an increase in population of 145 people, bringing the City's population to 32,892. As shown in Table 4.2-4, SBCAG's growth forecast estimates that the population in Goleta would increase from 32,892 residents to 34,700 residents by 2050, an increase of 1,808 residents. Therefore, the addition of 145 residents to Goleta would be within the SBCAG growth projections utilized within the 2022 Ozone Plan to forecast emissions (SBCAG 2019).

As described in further detail in Impact AQ-3, the proposed project's construction emissions would not result in substantial contributions to regional air pollutant emissions. In accordance with standard practices in the City, the following standard SBCAPCD fugitive dust control measures required by SBAPCD Rule 345 and enforced as Conditions of Approval would be required for project construction:

- During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding the SBAPCD's limit of 20 percent opacity for greater than 3 minutes in any 60 minute period. When using water, this includes wetting down areas as-needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- On-site vehicle speeds shall be no greater than 15 miles per hour when traveling on unpaved surfaces.
- Install and operate a track-out prevention device 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 importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, treat the disturbed area 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 roadways, driveways, sidewalks etc. to be paved should be completed as soon as possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by on-site operations from becoming a nuisance or hazard.
- The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures 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 Air Pollution Control District prior to grading/building permit issuance and/or map clearance.

As a Condition of Approval, the City would require the use of construction equipment that meets the Tier 4 emissions standards set by USEPA for non-road diesel engines, which would further reduce in particulate matter and NO_2 emissions during construction. As the proposed project would be consistent with the 2022 Ozone Plan's emissions forecast assumptions and would incorporate the standard fugitive dust control measures recommended by SBCAPCD during construction activities, the proposed project would be consistent with the 2022 Ozone Plan. Therefore, the proposed project would have a less than significant impact related to conflicts with or obstruction of implementation of the applicable air quality plan.

Mitigation Measures

No mitigation is required.

Threshold 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?

Impact AQ-2 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD GENERATE CRITERIA AIR POLLUTANT EMISSIONS; HOWEVER, THESE EMISSIONS WOULD NOT EXCEED APPLICABLE THRESHOLDS SET FORTH BY THE SANTA BARBARA AIR POLLUTION CONTROL DISTRICT. THEREFORE, THE 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. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

As described in Section 4.2.1, *Setting*, Santa Barbara County is currently classified as a nonattainment area under the CAAQS for O_3 and nonattainment-transitional under the CAAQS for PM_{10} (SBCAPCD 2025). As described in the Methodology discussion above, while SBCAPCD does not have quantitative thresholds of significance for short-term construction emissions, SBCAPCD recommends such emissions are quantified and compared to a 25 tons per year threshold for ROC or NO_X to determine the significance of construction impacts. SBCAPCD enforces pollutant thresholds for O_3 precursors (NO_x and ROC) and PM_{10} for operation. The proposed project's construction and operational emissions are quantified below and compared to the SBCAPCD quantitative thresholds of significance. The SBCAPCD thresholds of significance are intended to provide a quantitative measure of determining if a project could result in a cumulatively considerable net increase in criteria pollutants for which the region is in non-attainment.

SBCAPCD is not required to implement quantitative thresholds of significance for pollutants which are not considered nonattainment within the SCCAB. Accordingly, the quantification of CO, SO_2, and $PM_{2.5}$ below are provided for informational purposes.

Construction Emissions

Short-term impacts include those associated with grading and construction of the proposed project. Dust would be generated by construction equipment during grading (23,500 cubic yards of fill and 27,500 cubic yards of cut), implementation of infrastructure, and construction of the new building. In addition, use of heavy equipment/trucks, hauling of soil and construction materials, and other construction-related vehicles would result in on-site and off-site exhaust emissions. The grading and construction period would last 18 months. The proposed project's emissions resulting from grading and construction activities are summarized in Table 4.2-5.

Table 4.2-5 Construction Emissions

	Construction Emissions (tons/year)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Proposed Project Emissions	0.51	0.50	2.71	<0.005	0.42	0.19
Threshold	25	25	none	none	none	none
Exceed Threshold?	No	No	N/A	N/A	N/A	N/A

ROG = reactive organic gases, NOX = nitrogen oxides, CO = carbon monoxide, SO2 = sulfur dioxide, PM10 = particulate matter 10 microns in diameter or less, PM2.5 = particulate matter 2.5 microns or less in diameter

Source: Appendix C

As shown in Table 4.2-5, the proposed project's construction emissions of ROG and NO_X would not exceed the SBCAPCD threshold of 25 tons per year used by the City for this analysis. Therefore, as the project does not exceed SBCAPCD construction thresholds of significance for the criteria pollutants in nonattainment, project construction would not contribute substantially to an existing or projected air quality violation, and this impact would be less than significant.

Operational Emissions

Operation of the proposed project would generate long-term criteria air pollutant emissions from area sources (e.g., architectural coating, consumer products, and landscaping equipment), energy sources (i.e., electricity use), and mobile sources (i.e., vehicle trips to and from the project site). These estimated emissions are shown in Table 4.2-6. As shown in the table, the proposed project's operational emissions would not exceed significance threshold levels. Therefore, as the project does not exceed SBCAPCD operational thresholds of significance for the criteria pollutants in nonattainment, project operation would not contribute substantially to an existing or projected air quality violation, and this impact would be less than significant.

Table 4.2-6 Operational Emissions

	Operational Emissions (lbs/day)					
Source	**ROG**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	3.24	0.03	3.18	<0.005	<0.005	<0.005
Mobile Sources	1.90	1.18	9.80	0.02	1.73	0.45
Energy Sources	0.04	0.61	0.26	<0.005	0.05	0.05
Total	5.18	1.82	13.2	0.02	1.78	0.50
Threshold	25/55 [a]	25/55 [a]	none	none	80	none
Exceed Threshold?	No	No	N/A	N/A	No	N/A

Totals may be off slightly due to rounding.

[a] Transportation (mobile) sources only/total emissions.

ROG = reactive organic gases, NOX = nitrogen oxides, CO = carbon monoxide, SO2 = sulfur dioxide, PM10 = particulate matter 10 microns in diameter or less, PM2.5 = particulate matter 2.5 microns or less in diameter

Source: Appendix C

Mitigation Measures

No mitigation is required.

Threshold 3: Expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 CONSTRUCTION OF THE PROPOSED PROJECT WOULD RESULT IN POLLUTANT EMISSIONS; HOWEVER, THESE EMISSIONS WOULD BE SHORT-TERM AND MINIMIZED WITH USE OF TIER 4 CONSTRUCTION EQUIPMENT AND COMPLIANCE WITH SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT RULES 323.1, 329, AND 345. OPERATION OF THE PROJECT WOULD NOT INVOLVE THE USE OF EQUIPMENT THAT WOULD RESULT IN SUBSTANTIAL POLLUTANT CONCENTRATIONS AND THEREFORE WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS. THIS IMPACT 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. The nearest sensitive receptors to the project site are residences located approximately 200

feet to the west and 65 feet to the south. Construction-related activities would result in temporary project-generated diesel particulate matter exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. In addition, construction would involve volatile organic compound emission from paints vehicles, and NO_x emissions from construction equipment. Volatile organic compounds and NO_x are precursors to O_3, which could result in respiratory harm in large concentrations.

The Office of Environmental Health Hazard Assessment has identified carcinogenic and chronic noncarcinogenic effects from long-term exposure to diesel exhaust but has not identified health effects due to short-term exposure to diesel exhaust. While construction activities would occur within 65 feet of residential receptors, emissions associated with construction equipment would be short-term, temporary, and cease following the completion of construction, which would last 18 months. Furthermore, as a Condition of Approval, the City would require the use of construction equipment that meets the USEPA Tier 4 emissions standards for non-road diesel engines, which would substantially reduce localized air pollutant emissions, including particulate matter and NO_x from construction activities because Tier 4 emissions standards require the use of advanced emission control technologies in construction equipment engines. Through the implementation of Tier 4 standards, exhaust emissions from nonroad diesel engines decrease by approximately 90 percent (USEPA 2004). In addition, architectural coatings would be applied by construction personnel in compliance with SBCAPCD Rule 323.1, which limits the use of volatile organic compounds in paints. The use of asphalt would occur in accordance with SBCAPCD Rule 329 which limits the use of asphalt with high levels of reactive organic compound emissions. Compliance with SBCAPCD Rule 323.1 and 329 would minimize the amount of volatile organic compound and reactive organic compound emissions on-site during construction, respectively. Consequently, people would not be exposed to toxic substances long enough to create a significant health risk. In addition, the dust control measures of SBCAPCD's Rule 345 would be implemented by construction personnel to minimize fugitive dust emissions. Therefore, construction of the proposed project would have a less than significant impact related to exposing sensitive receptors to substantial pollutant concentrations.

Project operation would consist of single-family residences which themselves would not include the use of equipment that would increase toxic air emissions at the project site. Landscaping equipment such as lawnmowers could be used at individual residences; however, the sporadic and infrequent use of such equipment would not generate substantial pollutant concentrations at nearby sensitive receptors. This type of equipment does not have large engines, such as construction equipment engines, that can result in substantial pollutant emissions. Project operation would not result in substantial increases in vehicle trips and therefore would not result in substantial adverse air quality impacts related to carbon monoxide (Appendix C). Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations, and this impact would be less than significant.

Mitigation Measures

No mitigation is required.

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

Impact AQ-4 **PROJECT CONSTRUCTION WOULD RESULT IN ODORS ASSOCIATED WITH CONSTRUCTION EQUIPMENT USE THAT WOULD DISSIPATE RAPIDLY FROM THEIR SOURCES AND WOULD BE TEMPORARY AND INTERMITTENT. PROJECT OPERATION WOULD NOT RESULT IN SUBSTANTIAL ODORS BECAUSE THE PROPOSED PROJECT DOES NOT INCLUDE FACILITIES THAT COULD CAUSE SUBSTANTIAL ODORS. THIS IMPACT WOULD BE CLASS III, LESS THAN SIGNIFICANT.**

The project would generate oil and diesel fuel odors during construction from equipment use. Construction of new roadways on-site would require application of aggregate concrete (asphalt) that could create objectionable odors during construction. 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.

SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* (2022) states that certain projects have the potential to cause substantial odor impacts because of the nature of their operation and their location. Examples include fast food restaurants, bakeries, coffee roasting facilities, agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The proposed project does not include any facilities considered to have the potential to cause odor impacts. Therefore, the proposed project would have a less than significant impact related to emissions leading to odors that would adversely affect a substantial number of people.

4.2.4 Cumulative Impacts

The cumulative impact analysis considers impacts in the SCCAB that would occur from cumulative air pollutant emissions release as a result of reasonably anticipated projects identified in Table 3-1 of Chapter 3, *Related Projects*. The general approach to cumulative impact analysis used in this EIR is discussed in Chapter 3, *Related Projects*.

Conflicts with an Air Quality Management Plan and Criteria Air Pollutant Emissions

The geographic scope for evaluating cumulative impacts pertaining to conflicts with an air quality management plan and cumulatively considerable criteria air pollutant emissions is the SCCAB. This geographic scope is appropriate as the SCCAB is managed by SBCAPCD, and the 2022 Ozone Plan and SBCAPCD emissions thresholds are implemented in order to manage air quality within the SCCAB. Regional air pollution is largely a cumulative issue, and SBCAPCD's *Environmental Review Guidelines and Scope and Content of Air Quality Sections in Environmental Documents* includes 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 of Chapter 3, *Related Projects*, the planned, pending, and reasonably foreseeable projects within Goleta, at the time of this project would include the construction of a total of 534 residential units in addition to the proposed project's 56 residential units. Based on the City's average 2.59 persons per household estimated by the DOF, cumulative growth in Goleta would be approximately

1,528 residents.[3] SBCAG forecasts a population of 34,700 in Goleta in 2050 (SBCAG 2019), which functions as a basis for the 2022 Ozone Plan's emissions forecast. The addition of 1,528 residents to Goleta would result in a population of 34,275, which would be below SBCAG population forecasts. Thus, cumulative development would be accommodated within SBCAG growth projections. Cumulative development would not exceed the SBCAG growth assumptions, which function as a basis for the 2022 Ozone Plan's emissions forecast, and would not result in cumulatively considerable project emissions. Cumulative impacts related to conflicts with the 2022 Ozone Plan and the release of cumulative considerable criteria air pollutant emissions would therefore be less than significant.

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

The geographic scope for evaluating cumulative impacts pertaining to exposure of sensitive receptors to substantial pollutant concentrations includes projects adjacent to the project site, which is appropriate as such projects could result in air pollutant emissions which could combine with the proposed project's air pollutant emissions at the same sensitive receptors. Cumulative impacts in proximity to the project site such as the Annual Pavement Rehabilitation Project and Pavement Management Program adjacent to the south of the project site and the Glen Annie Golf Course Residential Development adjacent to the north and east of the project site could expose sensitive receptors to substantial pollutant concentrations if construction schedules overlapped. As stated in SBCAPCD's *Environmental Review Guidelines and Scope and Content of Air Quality Sections in Environmental Documents*, significance criteria for cumulative impacts are the same as project-level impacts. However, projects may still be approved even if they do not meet SBCAPCD significance criteria, which could lead to substantial pollutant concentrations at sensitive receptors. Therefore, cumulative impacts related to exposing sensitive receptors to substantial pollutant concentrations could be significant.

As described in Impact AQ-3, the proposed project's construction emissions would be short-term, temporary, and cease following the completion of construction. Construction equipment utilized for the proposed project would be equipped with Tier 4 engines which would substantially reduce air pollutant emissions from construction activities. Compliance with SBCAPCD Rules 323.1, 329 and 345 would ensure construction would minimize potential pollutant concentrations emitted from the use of paints and from fugitive dust generation. Project operation would not result in substantial pollutant concentrations. Therefore, the proposed project's contribution to cumulative impacts related to exposing receptors to substantial pollutant concentrations would not be considerable.

Odors

The geographic scope for evaluating cumulative impacts pertaining to odors includes areas adjacent to the project site, which is appropriate because odors dissipate with distance. 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. Cumulative projects in proximity to the project site such as the Annual Pavement Rehabilitation Project and Pavement Management Program and the Glen Annie Golf Course Residential Development adjacent to the north and east of the project site do not include odor producing facilities that could result in substantial operational odors. Therefore, cumulative

[3] Cumulative growth calculation includes the residential units that would be included as part of the proposed project. For the purposes of calculating cumulative growth within the City, this calculation does not take int account potential residential development at the Glen Annie Golf Course, which would be located within Santa Barbara County.

odors from the surrounding area from construction and operations would not be combined at the same receptors, and cumulative impacts related to odors would be less than significant.

4.3 Biological Resources

The analysis presented in this section provides background on the existing biological resource conditions and assesses impacts to biological resources that would result from implementation of the proposed project. The analysis is informed, in part, by the *Biological Assessment Report for the Shelby Residential Development Project* prepared by Watershed Environmental, Inc. in November 2025 (Appendix D). The study area, as identified in the *Biological Assessment Report for the Shelby Residential Development Project*, includes the 14.38-acre project site as well as a 100-foot buffer around the project site.

4.3.1 Environmental Setting

4.3.1.1 Regional Setting

The project site is located in Santa Barbara County, within the Santa Ynez—Sulphur Mountains ecological unit of the Southern California Coast. The Santa Ynez—Sulphur Mountains 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, and is generally defined by its topography and geography. Locally, the Santa Ynez Mountains to the north of the project site 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 occur 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 Goleta 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 in the area are typical of the coastal plains of Southern California. The habitats 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 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 Sperling Preserve and Lake Los Carneros (City of Goleta 2006).

4.3.1.2 Study Area Setting

Land Uses

The project site is primarily comprised of a large fallow field, with three small, vacant buildings, which include a 2,015-square-foot residence, 726-square-foot garage, and 1,152-square-foot barn. The project site was a productive avocado orchard until the late 1990s. The bulk of the avocado trees were removed between 1998 and 2002 by the property owner, with the remainder of trees removed before April 2015. The project site is no longer used for agriculture. The southern portion of the project site

is primarily bare ground used for storage of firewood and woodchips. The remainder of the project site, excluding buildings and ornamental plantings, is ruderal habitat that is dominated by nonnative weedy vegetation. Nonnative annual grassland borders the project site within the Cathedral Oaks Road right-of-way; this area is periodically mowed to control weeds and reduce risk of fires. The project site is surrounded by the Glen Annie Golf Course to the north and east; El Encanto Creek, Northgate Road, and multi-family residential development to the west; and Cathedral Oaks Road and single-family residences to the south.

Topography and Soils

The project site slopes from north to south at an average grade of approximately 7.8 percent. The existing elevation on the project site ranges from 145 feet above mean sea level in the southwestern portion of the project site to 252 feet above mean sea level in the northeastern portion of the project site. A distinct break in topography (downslope) occurs near the eastern and southern boundaries of the project site and may be the result of past fill placement, including 13.5 feet of clay soils over the southeastern portion of site, when Cathedral Oaks Road was constructed.

Three soil types occur at the project site:

- Diablo Clay, 2 to 9 percent slopes, on most of the project site. This soil is classified as well-drained, with a very high runoff class, medium runoff rate, and a slight hazard of erosion.
- Diablo Clay, 9 to 15 percent slopes, along a small portion of the eastern site boundary. This soil is classified as well drained with a very high runoff class, medium runoff rate, and a moderate hazard of erosion.
- Ayar Clay, 30 to 50 percent slopes, on the steep slopes in the northern portion of the project site. This soil is classified as well drained, with a rapid runoff rate, and high hazard of erosion.

None of the project site soils are hydric.[1]

Creeks, Watercourses, and Waterbodies

El Encanto Creek, which is part of the Devereux Slough watershed, flows adjacent to the west side of the project site and east of Northgate Drive for about 730 feet before traversing the Glen Annie Golf Course property for about 1,500 feet. From there, El Encanto Creek continues northward into open space and agricultural lands planted in avocados. The portion of the watershed north of Cathedral Oaks Road is approximately 290 acres, and the portion south of Cathedral Oaks Road is approximately 775 acres, for a total of 1,065 acres. South of Cathedral Oaks Road, El Encanto Creek passes through several residential neighborhoods and commercially developed areas, joins Devereux Creek in the Ellwood Mesa Open Space, and flows into Devereux Slough and the Pacific Ocean near Coal Oil Point.

The United States Geological Survey has mapped El Encanto Creek as having intermittent flow, although portions of the creek within the Glen Annie Golf Course and adjacent to the project site may have perennial flow in normal to wet years due in part to surface or subsurface irrigation runoff from the Glen Annie Golf Course. Pursuant to City of Goleta General Plan/Coastal Land Use Plan Conservation Element (CE) Policy 2.2 and Section 17.30.070 of the Goleta Municipal Code, a Streamside Protection Area (SPA) upland buffer associated with El Encanto Creek extends 100 feet on either side of the creek. Approximately 1.12 acres (49,148 square feet) of the El Encanto Creek SPA buffer occur on the project site.

[1] A hydric soil are soils that are permanently or seasonally saturated, flooded, or ponded long enough to result in anaerobic conditions (lack of oxygen) in the upper layers.

Wetlands

No wetland resources, as defined under the Clean Water Act (33 United States Code §§ 1251, *et seq*.; CWA) occur on the project site. A review of the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory identified no wetlands on the project site; however, vegetation along El Encanto Creek to the west of the project site is mapped as Freshwater Forested/Shrub Wetland that is seasonally flooded (Palustrine, Scrub-Shrub, Seasonally Flooded Wetland), and two man-made ponds on the Glen Annie Golf Course are mapped as Freshwater Pond Wetlands (Palustrine, Unconsolidated Bottom, Permanently Flooded, Diked/Impounded). No features on the project site meet the State or City wetland definition (i.e., do not support wetland soil, hydrology, or plants).

Vegetation, Land Cover, and Environmentally Sensitive Habitat Area

Six vegetation types and three land cover types were identified within the project site. Vegetation communities and land cover types are characterized based on vegetation composition, structure, and density, and classified using the *Manual of California Vegetation Online Edition* and California Natural Community List. Sensitive vegetation communities include wetlands and riparian communities, as well as those communities that the California Department of Fish and Wildlife (CDFW) has identified as a high priority for inventory due to rarity or threat in California. Additionally, within Goleta, several communities are identified as sensitive in the Conservation Element of the General Plan/Coastal Land Use Plan (City of Goleta 2006). For the purposes of this analysis, sensitive vegetation communities include:

- Alliances on CDFW's California Natural Communities List with a State rarity rank of S1, S2, or S3;
- Riparian and wetland communities; and
- Communities designated as sensitive by the City of Goleta's General Plan/Coastal Land Use Plan.

The acreages of vegetation and land cover types are summarized in Table 4.3-1. Figure 4.3-1 depicts the locations of the existing vegetation and land cover types. Each of the vegetation types present on the project site is described below. No CDFW sensitive natural communities are located on the project site.

Table 4.3-1 Existing Vegetation and Land Cover Types on the Project Site

Vegetation and Land Cover Type	Area (square feet)	Area (acres)	State Rarity Rank/ESHA
Vegetation Types			
Arroyo Willow Thicket ESHA	163	0	S4; ESHA
Black Sage - California Sagebrush Scrub ESHA	256	0	S4; ESHA
Eucalyptus Grove	10,732	0.25	SNA; ESHA
Nonnative Grassland	5,134	0.12	SNA; Not ESHA
Ornamental Landscape Vegetation	79,589	1.83	SNR; Not ESHA
Ruderal	513,114	11.78	SNR; Not ESHA
Subtotal Vegetation Types	608,988	13.98	
Land Cover Types			
Dirt Road	4,812	0.11	NA
Paved Roadway (roads, driveways, parking areas)	9,660	0.22	NA
Structures	2,731	0.06	NA
Subtotal Land Cover Types	17,203	0.39	
Grand Total Vegetation and Land Cover	**626,191**	**14.37***	

NA = not applicable. Not identified in Manual of California Vegetation Online Edition or California Natural Community List; therefore, there is no sensitivity status.

S4 = Apparently secure, not sensitive. At a fairly low risk of extirpation in the jurisdiction due to an extensive range and/or many population occurrences, but with possible cause for some concern as a result of local recent declines, threats, or other factors.

SNA = Semi-natural alliance or association. Associated with a nonnative plant; therefore, there is no sensitivity status.

SNR = State not ranked.

ESHA = City-designated Environmentally Sensitive Habitat Area

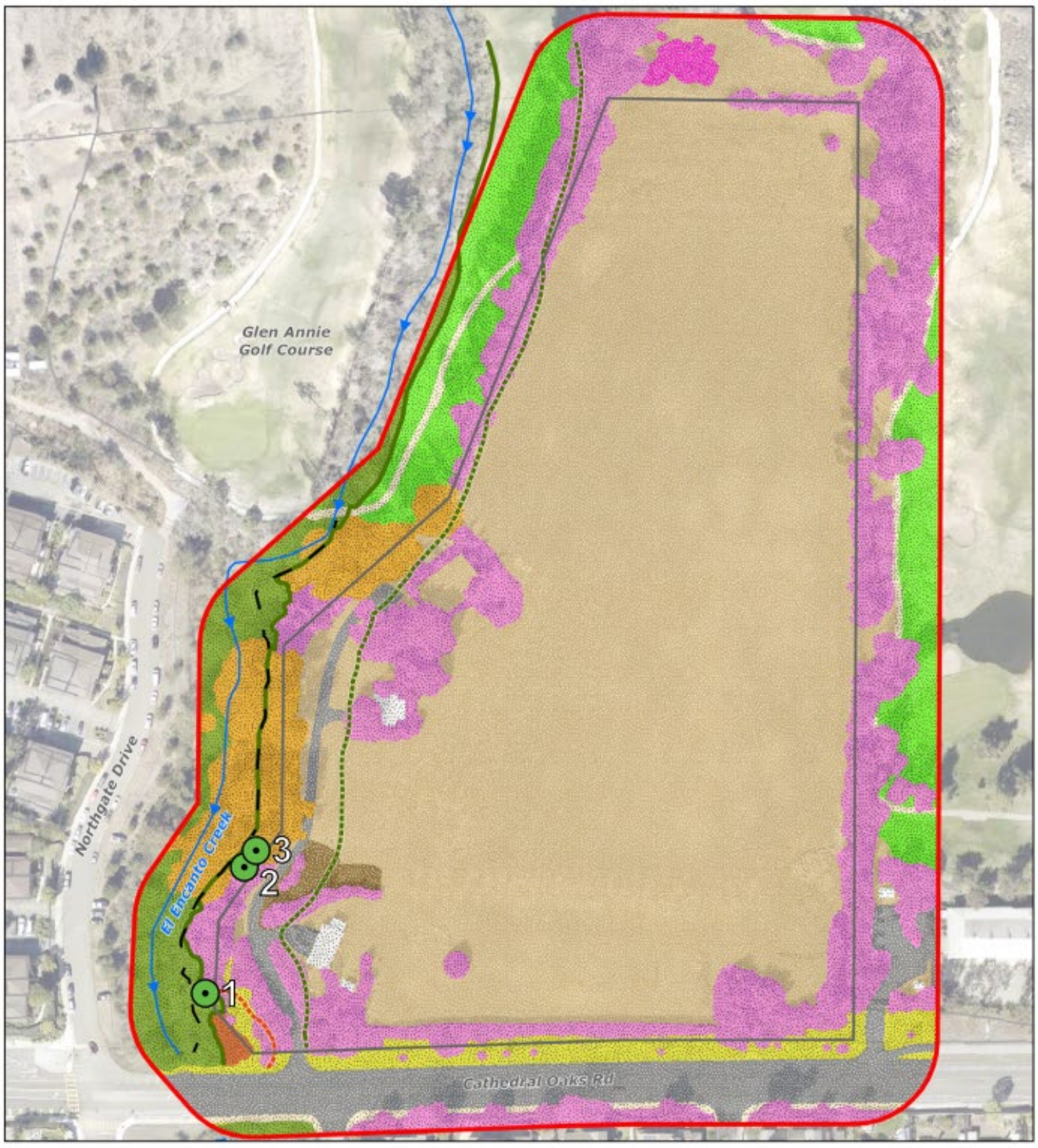
* Acreage values total to 0.01 acre less than calculation for the entire project site due to rounding error.

Vegetation categories that are less than 0.005 acre are not included.

Protected Trees

The City of Goleta General Plan/Coastal Land Use Plan Policy CE 9.1 defines protected trees as the following: oaks (*Quercus* spp.), walnut (*Juglans californica*), sycamore (*Platanus racemosa*), cottonwood (*Populus* spp.), willows (*Salix* spp.), or other native trees that are not otherwise protected in Environmentally Sensitive Habitat Area (ESHA) (City of Goleta 2006). In accordance with City of Goleta General Plan/Coastal Land Use Plan Policy CE 9.2, an inventory of native protected trees on the project site was conducted in 2025. No protected trees are located on the project site. Three native coast live oak trees are located on the Glen Annie Golf Course, within the study area and adjacent to the project site's western boundary. The canopies and/or critical root zones of these trees extend onto the project site. Two of these trees are growing beneath the canopy of olive and blue gum eucalyptus and one tree is growing in black sage – California sagebrush scrub ESHA vegetation. All three of these trees are protected under the City of Goleta General Plan/Coastal Land Use Plan. Figure 4.3-1 depicts the locations of the protected coast live oak trees.

Figure 4.3-1 Vegetation Types within the Study Area



Source: SBCO, 2024.

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Arroyo Willow Thicket ESHA

The arroyo willow thicket ESHA vegetation type occurs within the study area along El Encanto Creek, west and northwest of the project site. A small portion (163 square feet) of arroyo willow thicket ESHA vegetation also occurs within the project site. The dominant species is arroyo willow *(Salix lasiolepis)*. There are also a few coast live oak *(Quercus agrifolia)*, western sycamore (*Platanus racemosa)*, and blue gum eucalyptus *(Eucalyptus globulus)* trees within this vegetation type within the study area, but outside the project site. The dominant understory species are Pacific blackberry *(Rubus ursinus)* and poison oak *(Toxicodendron diversilobum)*.

This vegetation type meets the classification criteria to be called *Salix lasiolepis* Shrubland Alliance with a *Rubus ursinus - Toxicodendron diversilobum* association. The CDFW California Natural Community List has assigned this vegetation type a global rarity rank of G4 and state rarity rank of S4, meaning this vegetation type is secure at global and state levels. However, the CDFW California Sensitive Natural Communities List classifies arroyo willow riparian scrub as sensitive. This vegetation type is riparian and listed as sensitive by CDFW and thus meets the City of Goleta General Plan/Coastal Land Use Plan CE Policies 1.1 and 1.2 criteria to be classified as ESHA. As such, the arroyo willow thicket vegetation type is subject to the creek and riparian habitat protection measures specified in City of Goleta General Plan/Coastal Land Use Plan CE Policy 2.2 and Policy 2.3, as well as the City's Title 17 zoning ordinance.

Black Sage - California Sagebrush Scrub ESHA

The black sage – California sagebrush scrub ESHA vegetation type primarily occurs within the study area southwest of the project site adjacent to Cathedral Oaks Road. A small portion of this vegetation type (256 square feet) extends onto the project site in the southwestern portion. The dominant species is black sage *(Salvia melifera).* Other species present include California sagebrush *(Artemisia californica),* coyote brush *(Baccharis pilularis)*, Santa Barbara honeysuckle *(Lonicera subspicata var. subspicata),* and poison oak.

This vegetation type meets the classification criteria to be called a *Salvia mellifera- Artemisia californica* Shrubland Alliance with a *Lonicera subspicata- Baccharis pilularis- Toxicodendron diversilobum* association. The CDFW California Natural Community List has assigned this vegetation type a global rarity rank of G4 and state rarity rank of S4, meaning this vegetation type is secure at global and state levels. The CDFW California Sensitive Natural Communities List does not list this vegetation type as sensitive. The black sage – California sagebrush scrub vegetation in the study area is not designated or mapped by the City of Goleta as ESHA; however, this vegetation type meets the City of Goleta General Plan/Coastal Land Use Plan CE Policy 1.1 and 1.2 criteria to be classified as an ESHA because it is a type of coastal sage scrub vegetation. In addition, the on-site occurrences of this community contain rare Santa Barbara honeysuckle plants. The black sage – California sagebrush scrub vegetation in the study area is subject to the coastal sage scrub protection measures contained in City of Goleta General Plan/Coastal Land Use Plan CE Policy 5.3, which requires a 25-foot buffer restored with native species around the perimeter of this vegetation. While black sage – California sagebrush scrub ESHA occurs adjacent to arroyo willow thicket ESHA along El Encanto Creek and within the 100-foot SPA upland buffer, it is not riparian and is not subject to the streamside protection measures contained in City of Goleta General Plan/Coastal Land Use Plan CE Policy 2.2 or the City's Title 17 zoning ordinance.

Eucalyptus Grove

The eucalyptus grove vegetation type occurs in the study area, in both the southwestern portion of the project site and on the portion of the Glen Annie Golf Course located west of the project site. The dominant tree species is nonnative blue gum eucalyptus *(Eucalyptus globulus)*. Understory vegetation beneath the eucalyptus tree canopy is sparse but includes cape ivy *(Delairea odorata),* periwinkle *(Vinca major)*, and poison oak. All of the eucalyptus tree trunks in this grove are located outside of the project site, with the tree canopy of some of the eucalyptus trees extending out over the project site.

This vegetation type meets the classification criteria to be called a *Eucalyptus globulus* Woodland Semi-Natural Alliance with a *Delairea odorata - Vinca major- Toxicodendron diversilobum* association. The CDFW California Natural Community List has not assigned this nonnative vegetation type a global or state rarity ranking. The CDFW California Sensitive Natural Communities List does not list this vegetation type as sensitive. Blue gum eucalyptus, cape ivy, and periwinkle are all listed as invasive by the California Invasive Plant Council.

The eucalyptus grove in the study area is not listed as a winter aggregation site for monarch butterflies. Some of the eucalyptus trees in the study area are quite large and have a potential to be used by owls and other raptors to roost and/or nest, and as such, the trees in this eucalyptus grove are subject to the special-status species protection policies contained in City of Goleta General Plan/Coastal Land Use Plan CE Policies 8.1, 8.2, and 8.4. Furthermore, this vegetation type meets the criteria of the City of Goleta General Plan/Coastal Land Use Plan Conservation Element Policies 1.1 and 1.2 to be classified as raptor roosting habitat ESHA and is mapped as ESHA by the City.

Nonnative Grassland

Nonnative grassland vegetation exists along the shoulders of Cathedral Oaks Road and Northgate Drive and is comprised of a mixture of annual nonnative grasses and herbs, both within the project site and the study area. The dominant species in this vegetation type are wild oat *(Avena fatua)*, ripgut brome *(Bromus diandrus)*, and foxtail barley (*Hordeum murinum)*. Other species found in this nonnative annual grassland include red brome *(Bromus rubens)*, Italian rye *(Festuca perennis)*, rattail fescue *(Festuca myuros)*, smilo grass *(Stipa miliacea)*, soft brome *(Bromus hordeaceus)*, Harding grass *(Phalaris aquatica)*, wild radish *(Raphanus sativus)*, black mustard *(Brassica nigra)*, fennel *(Foeniculum vulgare)*, cheeseweed *(Malva parviflora)*, common vetch *(Vicia sativa)*, redstem filaree *(Erodium cicutarium)*, bristly ox tongue *(Helminthotheca echioides),* and bur clover *(Medicago polymorpha)*.

This vegetation type meets the classification criteria to be called a *Avena fatua- Bromus diandrus-Horderum murinum* Herbaceous Semi-Natural Alliance. The CDFW California Natural Community List has not assigned Bermuda grass a global or state rarity ranking. The CDFW California Sensitive Natural Communities List does not list this vegetation type as sensitive. The nonnative annual grasslands in the study area are not designated or mapped by the City as ESHA, and the vegetation type does not meet the City of Goleta General Plan/Coastal Land Use Plan CE Policies 1.1 or 1.2 criteria to be classified as ESHA. This vegetation type is not riparian and is not subject to the streamside protection measures in City of Goleta General Plan/Coastal Land Use Plan CE Policy 2.2 or the City's Title 17 zoning ordinance.

Ornamental Landscape Vegetation

The ornamental landscape vegetation type includes the mousehole tree *(Myoporum laetum)* and olive trees on the Glen Annie Golf Course adjacent to the project site's eastern, western, and northern boundaries with canopies that extend out onto the project site. It also includes blackwood acacia *(Acacia melanoxylon)*, Brazilian pepper *(Schinus terebinthifolia)*, Peruvian pepper *(Schinus molle)*, and redbox eucalyptus *(Eucalyptus polyanthemos)* trees that line the existing asphalt paved driveway between Cathedral Oaks Road and the existing single-family residence on the project site, a row of Peruvian pepper trees planted on the project site along the southern boundary, a row of strawberry trees *(Arbutus unedo)* planted along the Cathedral Oaks Road right of way, and assorted ornamental landscape trees, palms, and shrubs growing around the existing structures on-site. There are 236 nonnative trees on the project site.

None of the nonnative ornamental trees on the project site meet the County's 2024 *Environmental Thresholds and Guidelines Manual* 'specimen tree' definition, which is *"mature trees that are healthy and structurally sound and have grown into the natural stature particular to the species."* The ornamental nonnative vegetation on the project site does not fit into the *Manual of California Vegetation Online Edition* classification scheme and is not a vegetation type listed by the CDFW California Natural Community List and, as such, does not have a global or state rarity ranking. This ornamental vegetation does not meet the City of Goleta General Plan/Coastal Land Use Plan CE Policies 1.1 or 1.2 criteria to be classified as ESHA. This vegetation type is not riparian and is not subject to the streamside protection measures in City of Goleta General Plan/Coastal Land Use Plan CE Policy 2.2 or the City's Title 17 zoning ordinance.

Ruderal

Ruderal is a term that is applied to weedy vegetation in recently disturbed areas. This vegetation type occurs across most of the project site in portions that were previously farmed. The dominant species include black mustard*,* horseweed *(Erigeron canadensis),* Russian thistle *(Salsola tragus),* poison hemlock *(Conium maculatum)*, and ripgut brome. Other species present include smilo grass *(Stipa miliacea)*, Italian thistle *(Carduus pycnocephalus)*, cheeseweed *(Malva parviflora)*, prostrate sandmat (*Euphorbia prostrata)*, bur clover, scarlet beeblossom *(Oenothera suffrutescens),* curly dock *(Rumex crispus),* scarlet pimpernel *(Lysimachia arvensis),* and bindweed *(convolvulus arvensis).*

The ruderal vegetation within the project site does not fit into the *Manual of California Vegetation Online Edition* classification scheme and is not a vegetation type listed by the CDFW California Natural Community List and, as such, does not have a global or state rarity ranking. This vegetation type does not meet the City of Goleta General Plan/Coastal Land Use Plan CE Policies 1.1 or 1.2 criteria to be classified as ESHA. This vegetation type is not riparian and is not subject to the streamside protection measures in City of Goleta General Plan/Coastal Land Use Plan CE Policy 2.2 or the City's Title 17 zoning ordinance.

Land Cover Types

Three land cover types exist on the project site: dirt road, paved roadway (roads, driveway and parking area), and structures. Dirt road exists in the southwestern portion of the project site near the garage/workshop. Paved roadway includes the portions of Cathedral Oaks Road that is in the study area, the asphalt driveway on the project site, and paved vehicle parking spaces on and adjacent to the project site. Structures include the existing single-family residence, barn, and garage on the project site.

Special-Status Species

Special-status species are candidate, proposed, or listed threatened or endangered species under the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA); species meeting the CEQA definition of "rare;"[2] and designated as Species of Special Concern by the state. Additionally, special-status plant species also include those ranked by the California Native Plant Society (CNPS) as a California Rare Plant Rank (CRPR) 1 or 2, as well as plants listed by the Santa Barbara Botanic Garden as locally sensitive. No critical habitat for special-status species occurs on the project site.

Special-Status Plant Species

Surveys were conducted by Watershed Environmental, Inc. within the study area on June 20, July 11, July 21, August 22, November 3, and November 5, 2025 (Appendix D). A review of the California Native Plant Society rare plant database was conducted on October 10, 2025, by Rincon Consultants, Inc. During the surveys Santa Barbara honeysuckle, a special-status plant species, was identified on the project site. No other special-status plant species were identified on the project site. However, as part of the literature review, two special-status plant species with moderate potential to occur were identified on the project site: ocellated Humboldt lily (*Lilium humboldtii* ssp. *ocellatum*) and black-flowered figwort (*Scrophularia atrata*). The following subsections describe these three species. No other special-status plant species have potential to occur within the project site.

SANTA BARBARA HONEYSUCKLE

Santa Barbara honeysuckle occurs mostly in Santa Barbara County and is found in chaparral, oak woodland, and riparian habitats. A few locations have also been recorded in the Santa Monica Mountains of Los Angeles County. Santa Barbara honeysuckle is designated by the CNPS as a CRPR 1.B.2 plant species, considered rare, threatened, or endangered in California or extinct elsewhere, and it is moderately threatened in California (approximately 20 to 80 percent of occurrences being threatened). In addition, the Santa Barbara Botanic Garden has designated Santa Barbara honeysuckle as Rare. Within the project site, Santa Barbara honeysuckle occurs along El Encanto Creek within riparian and coastal sage scrub vegetation types. Approximately 59 Santa Barbara honeysuckle shrubs were observed on the western edge of the project site, with a cluster of Santa Barbara honeysuckle shrubs occurring in the southwestern portion of the project site.

OCELLATED HUMBOLDT LILY

Ocellated Humboldt lily is a perennial herb native to California. It occurs in chaparral, cismontane woodland, and lower montane coniferous forest habitats, typically between 600 and 2,100 meters in elevation. Ocellated Humboldt lily is designated by the CNPS as a CRPR 4.2 plant species, indicating it is of limited distribution in California and moderately threatened in the state. This species is locally rare. A moderate amount of suitable riparian woodland habitat is present on-site, as well as a limited amount of suitable habitat present on-site. Thus, this species has a moderate potential to occur.

[2] CEQA Guidelines § 15380(a)(2) defines "rare" as "(A) although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or (B) the species is likely to become endangered within the foreseeable future throughout all of a significant portion of its range and may be considered 'threatened' as that term is used in the Federal Endangered Species Act."

BLACK-FLOWERED FIGWORT

Black-flowered figwort is a perennial herb endemic to California. It is typically found in chaparral, coastal scrub, and cismontane woodland habitats, often on clay or serpentine soils, at elevations ranging from 30 to 550 meters. Black-flowered figwort is designated by the CNPS as a CRPR 1B.2 plant species, indicating it is rare, threatened, or endangered in California and elsewhere, and is moderately threatened in California. The Santa Barbara Botanic Garden also designates black-flowered figwort as Rare. A moderate amount of suitable riparian woodland habitat is present on-site, as well as a limited amount of suitable habitat present on-site. Thus, this species has a moderate potential to occur.

Special-Status Wildlife Species

A literature review was conducted by Watershed Environmental, Inc. to determine the potential for special-status species' occurrence within the study area. In addition, surveys were conducted by Watershed Environmental, Inc. within the study area on June 20, July 11, July 21, August 22, November 3, and November 5, 2025 (Appendix D). During the surveys, a total of 35 wildlife species were identified on the project site, none of which were special-status wildlife species. As part of the literature review, one special-status species with a moderate potential to occur within the project site was identified: western red bat (*Lasiurus frantzii*). The following subsection describes this species.

WESTERN RED BAT

A year-round California resident and California Species of Special Concern, the western red bat generally does not form colonies and roosts individually under leaves of riparian or orchard trees in grassland and woodland habitats. Given the large number of ornamental trees in the western portion of the study area along El Encanto Creek and along the adjacent golf course, western red bats have a moderate potential to roost and forage in the ornamental trees on the project site.

4.3.1.3 Wildlife Corridors and Habitat Linkages

Wildlife corridors are linear features that connect large patches of natural open space, facilitating the dispersal or migration of animals and plants. These corridors are crucial for maintaining population viability by ensuring the continual exchange of genes between populations, which helps preserve genetic diversity. Habitat linkages are smaller patches that join larger habitat blocks, mitigating the adverse effects of habitat fragmentation. These linkages serve as potential routes for gene flow and long-term dispersal, especially for small animals like reptiles, amphibians, and rodents. Habitat linkages can be continuous patches of habitat or nearby habitat "islands" that act as steppingstones for dispersal and movement, particularly for birds and flying insects.

The project site is surrounded by residential development and the Glen Annie Golf Course. The perimeter of the project site is fenced with a six-foot-tall chain-link fence with three strand barbed wire along the top of the fence. The only gap in the fence is a 17-foot-wide gate located on the asphalt paved driveway entrance from Cathedral Oaks Road that is frequently left open. The perimeter fence around the project site effectively prevents large mammals such as mule deer, black bear, and mountain lion from entering the project site; however, medium- to small-size mammals, amphibians, birds, and reptiles can climb, fly, tunnel, or pass through the fence. Given the habitat and vegetation types present on the project site, and lack of essential wildlife resources such as food, water, and shelter, wildlife utilization of the project site is very low and likely limited to a few common resident species of amphibians, small mammals, reptiles, and common migratory and resident birds.

The segment of El Encanto Creek that exists on the Glen Annie Golf Course west and northwest of the project site, as well as the segment of the creek south of Cathedral Oaks Road, provide the only habitat in the project site's vicinity that could be used as a wildlife movement corridor. The ability of El Encanto Creek to serve as a wildlife corridor between open space to the north and the Pacific Ocean to the south has been greatly reduced over time due to urban development south of the project site. Game cameras installed in the creek bed between August 22, 2025 and September 2, 2025 documented occurrences of opossums, striped skunks, coyotes, brush rabbits, ground squirrels, mice, and rats moving through the creek corridor. Most of the wildlife movement occurred after dark or in the pre-dawn early morning hours.

4.3.2 Regulatory Setting

a. Federal Regulations

Federal Endangered Species Act

Under the federal ESA, authorization is required to "take" a listed species. Take, defined under ESA Section 3, is "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. USFWS and National Marine Fisheries Service share responsibility and regulatory authority for implementing the ESA (7 United States Code Section 136, 16 United States Code Section 1531 et seq.).

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 Section 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 Section 703-711) and the Bald and Golden Eagle Protection Act (16 United States Code Section 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 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 Code of Federal Regulations Part 328.3 to include navigable waters, perennial and intermittent streams, lakes, rivers, ponds, as well as wetlands, marshes, and wet meadows. The United States 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 water 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.

b. State Regulations

Porter-Cologne Water Quality Control Act

The State Water Resources Control Board (SWRCB) and nine 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 Section 13050(e)). In the City of Goleta, the Central Coast RWQCB implements this act 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 (California Fish and Game Code [CFGC] Section 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”. Take under the CESA does not include indirect harm by way of habitat modification (California Fish and Game Code [CFGC] Section 86). CFGC Section 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 California Code of Regulations Section 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; CDFW cannot authorize takings under these circumstances. Requirements for the protection of fully protected species are described in CFGC (Sections 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

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

California Fish and Game Code

The CFGC is designed to protect and manage the State's fish, wildlife, and natural habitats. It establishes regulations for hunting, fishing, and conservation efforts to ensure sustainable use of these resources. The CFGC also aims to preserve biodiversity and promote ecological balance by addressing issues such as endangered species protection and habitat restoration.

- **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, 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.

c. Local Regulations

City of Goleta General Plan/Coastal Land Use Plan

The Goleta General Plan/Coastal Land Use Plan Conservation Element (2006) includes policies that protect and preserve biological resources within Goleta by designating protected biological resources, restricting land uses in protected areas and setting forth mitigation requirements for potential impacts to biological resources. Objectives and policies relevant to the proposed project include the following:

- **Policy CE 1.3: Site-Specific Studies and Unmapped ESHAs**. Any area not designated on the ESHA map in Figure 4-1 that meets the ESHA criteria for the resources specified in CE 1.1 shall be granted the same protections as if the area was shown on the map. Proposals for development on sites where ESHAs are shown on the map or where there is probable cause to believe that ESHAs may exist shall be required to provide the City with a site-specific biological study that includes the following information:
  a. A base map that delineates topographic lines, parcel boundaries, and adjacent roads.
  b. A vegetation map that identifies species that may be indicators of ESHAs.
  c. A soils map that delineates hydric and nonhydric soils, if applicable.
  d. A census of animal species that indicates the potential existence of ESHAs.
  e. A detailed map that shows the conclusions regarding the boundary, precise location and extent, or current status of the ESHA based on substantial evidence provided in the biological studies.

- **Policy CE 1.5: Corrections to Map of ESHAs.** If a site-specific biological study, prepared consistent with subpolicy CE 1.3, contains substantial evidence that an area previously shown as an ESHA on Figure 4-1 (and Figure 3-5) does not contain habitat that meets the definition of an ESHA for reasons, other than that set forth in CE 1.4, or an area not shown as ESHA on Figure 4-1 (and Figure 3-5) that meets the definition of an ESHA, the Planning Commission, or the City Council if it is otherwise the Review Authority for the underlying project under Title 17 of the Goleta Municipal Code, shall make a finding based on substantial evidence as part of the project approval regarding the physical extent of the ESHA and detailed justification for revisions at the project site. If the Planning Commission, or the City Council if it is otherwise the Review Authority for the underlying project under Title 17 of the Goleta Municipal Code, finds that a change in the mapped ESHA is warranted, a map revision shall be included in the next General Plan/Coastal Land Use Plan ESHA map amendment as detailed below. In cases of removal of mapped ESHA, the General Plan/Coastal Land Use Plan policies and standards for protection of ESHAs shall not apply, and approval of development consistent with all other requirements of the General Plan/Coastal Land Use Plan may be considered prior to the map revision.

  At a minimum, Figure 4-1 (and Figure 3-5) shall be reviewed and updated every five years to reflect currently available information, including up-to-date information on locations of rare, threatened, or endangered species or habitats; changes made in project approval decisions; and changes due to rising sea level.
- **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.

- **Policy CE 1.8: ESHA Buffers**. Development adjacent to an ESHA shall minimize impacts to habitat values or sensitive species to the maximum extent feasible. Native vegetation shall be provided in buffer areas to serve as transitional habitat. All buffers shall be of a sufficient size to ensure the biological integrity and preservation of the ESHA they are designed to protect.
- **Policy CE 1.9: Standards Applicable to Development Projects**. 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 for parcels within or adjacent to an ESHA shall only be allowed if each new lot being created, except for open space lots, is capable of being developed without building in any ESHA or ESHA buffer and without any need for impacts to ESHAs related to fuel modification for fire safety purposes.
  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, for fire safety in order to preserve native and/or nonnative supporting habitats. Development shall use fire resistant materials and incorporate alternative measures, such as firewalls and landscaping techniques, that will reduce or avoid fuel modification activities.
  h. The timing of grading and construction activities shall be controlled to minimize potential disruption of wildlife during critical time periods such as nesting or breeding seasons.
  i. Grading, earthmoving, and vegetation clearance adjacent to an ESHA shall be prohibited during the rainy season, generally from November 1 to March 31, except as follows: 1) where erosion control measures such as sediment basins, silt fencing, sandbagging, or installation of geofabrics have been incorporated into the project and approved in advance by the City; 2) where necessary to protect or enhance the ESHA itself; or 3) where necessary to remediate hazardous flooding or geologic conditions that endanger public health and safety.
  j. In areas that are not adjacent to ESHAs, where grading may be allowed during the rainy season, erosion control measures such as sediment basins, silt fencing, sandbagging, and installation of geofabrics shall be implemented prior to and concurrent with all grading operations.

- **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.
- **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.

- **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.

- **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.

- **Policy CE 5.3: Protection of Coastal Bluff Scrub, Coastal Sage Scrub, and Chaparral ESHA**. In addition to the provisions of Policy CE 1, the following standards shall apply:

  a. For purposes of this policy, coastal bluff scrub is defined as scrub habitat occurring on exposed coastal bluffs. Example species in bluff scrub habitat include Brewer's saltbush (*Atriplex lentiformis*), lemonade berry (Rhus integrifolia), seashore blight (*Suaeda californica*), seacliff buckwheat (*Eriogonum parvifolium*), California sagebrush (Artemisia californica), and coyote bush (Baccharis pilularis). 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. Chaparral is defined as fire- and drought-adapted woody, evergreen shrubs generally occurring on hills and lower mountain slopes. 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.

  b. To the maximum extent feasible, development shall avoid impacts to coastal bluff scrub, coastal sage scrub, or chaparral habitat that is part of a wildlife movement corridor and the impact would preclude animal movement or isolate ESHAs previously connected by the corridor such as (1) disrupting associated bird and animal movement patterns and seed dispersal, and/or (2) increasing erosion and sedimentation impacts to nearby creeks or drainages.

  c. Impacts to coastal bluff scrub, coastal sage scrub, and chaparral ESHAs shall be minimized by providing at least a 25-foot buffer restored with native species

- **Policy CE 8.1: ESHA Designation**. Requisite habitats for individual occurrences of special-status plants and animals, including candidate species for listing under the state and federal endangered species acts, California species of special concern, California Native Plant Society List 1B plants, and other species protected under provisions of the California Fish and Game Code shall be preserved and protected, and their occurrences, including habitat requirements, shall be designated as ESHAs. These habitats include, but are not limited to, the following:
  a. Special-status plant species such as Santa Barbara honeysuckle (*Lonicera subspicata var. subspicata),* southern tarplant (*Centromadia parryi ssp. australis*) and black-flowered figwort (*Scrophularia atrata*).
  b. Habitat capable of supporting special-status invertebrate species, such as the globose dune beetle (*Coelus globosus*), and roosting habitat for the monarch butterfly.
  c. Aquatic habitat capable of supporting special-status fish species such as the steelhead trout (*Oncorhynchus mykiss*) and tidewater goby (*Eucyclogobius newberryi*).
  d. Habitat capable of supporting special-status amphibians and reptiles such as the red-legged frog (*Rana aurora draytonii*) and western pond turtle (*Clemmys marmorata pallida*).
  e. Nesting and roosting areas for various species of raptors such as Cooper's hawks (*Accipiter cooperii*), red-tailed hawks (*Buteo jamaicensis*), white-tailed kites (*Elanus leucurus*), and turkey vultures (*Cathartes aura*).
  f. Nesting habitat for other special-status bird species such as western snowy plover, southwestern willow flycatcher (*Empidonax traillii extimus*), loggerhead shrike (*Lanius ludovicianus*), yellow warbler (*Dendroica petechia*), or tri-colored blackbird (*Agelaius tricolor*).
  g. Nesting and foraging habitat for special-status mammals such as pallid bat (*Antrozous pallidus*), western red bat (*Lasiurus blossevillii*), Yuma myotis (*Myotis yumanensis*), and American badger (*Taxidea taxus*).
- **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.
- **Policy CE 8.3: Site-Specific Biological Resources Study**. Any areas not designated on Figure 4-1 that meet the ESHA criteria for the resources specified in CE 8.1 shall be accorded the same protections as if the area were shown on the figure. Proposals for development on sites where ESHAs are shown on the figure, or where there is probable cause to believe that an ESHA may exist, shall be required to provide the City with a site-specific biological study that includes the following information:
  a. A base map that delineates topographic lines, parcel boundaries, and adjacent roads.
  b. A vegetation map that 1) identifies trees or other sites that are existing or historical nests for the species of concern and 2) delineates other elements of the habitat such as roosting sites and foraging areas.
  c. A detailed map that shows the conclusions regarding the boundary, precise location and extent, or current status of the ESHA based on substantial evidence provided in the biological studies.
  d. A written report that summarizes the survey methods, data, observations, findings, and recommendations.

- **Policy CE 8.4: Buffer Areas for Raptor Species**. Development shall be designed to provide a 100-foot buffer around active and historical nest sites for protected species of raptors when feasible. In existing developed areas, the width of the buffer may be reduced to correspond to the actual width of the buffer for adjacent development. If the biological study described in CE 8.3 determines that an active raptor nest site exists on the subject property, whenever feasible no vegetation clearing, grading, construction, or other development activity shall be allowed within a 300-foot radius of the nest site during the nesting and fledging season.
- **Policy CE 9.1: Definition of Protected Trees**. New development shall be sited and designed to preserve the following species of native trees: oaks (*Quercus* spp.), walnut (*Juglans californica*), sycamore (*Platanus racemosa*), cottonwood (*Populus* spp.), willows (*Salix* spp.), or other native trees that are not otherwise protected in ESHAs, unless as otherwise allowed in CE 9.
- **Policy CE 9.5: Mitigation of Impacts to Native Trees**. Where the removal of mature native trees cannot be avoided through the implementation of project alternatives or where development encroaches into the protected zone and could threaten the continued viability of the tree(s), mitigation measures shall include, at a minimum, the planting of replacement trees on site, if suitable area exists on the subject site, or offsite if suitable onsite area is unavailable, consistent with the Tree Protection Ordinance (see also CE-IA-4). The Tree Protection Ordinance shall establish the mitigation ratios for replacement trees for every tree removed. Where onsite mitigation is not feasible, offsite mitigation shall be provided by planting of replacement trees at a site within the same watershed. If the tree removal occurs at a site within the Coastal Zone, any offsite mitigation area shall also be located within the Coastal Zone. Minimum sizes for various species of replacement trees shall be established in the Tree Protection Ordinance. Mitigation sites shall be monitored for a period of five years. The City may require replanting of trees that do not survive.

Goleta Municipal Code

Chapter 17.30, Environmentally Sensitive Habitat Areas, of the Goleta Municipal Code establishes standards for development that could impact ESHA and describes the review process for such proposed development. Specifically, Section 17.30.030 sets requirements for biological studies for development applications within 300 feet of ESHA; Section 17.30.040 provides development and mitigation regulations for projects within ESHA or an ESHA buffer; Section 17.30.050 provides development standards and requires that any project that has the potential to cause adverse impacts to an ESHA be redesigned, reduced in size, or relocated so as to avoid the impact or reduce the impact where complete avoidance is not possible; Section 17.30.060 provides standards for the management of ESHAs; and Section 17.030.070 provides standards for development within SPA buffers.

4.3.3 Impact Analysis

4.3.3.1 Methodology and Significance Thresholds

Methodology

To support the *Biological Assessment Report for the Shelby Residential Development Project*, Watershed Environmental, Inc. conducted surveys within the study area on June 20, July 11, July 21, August 22, November 3, and November 5, 2025 to document the existing site conditions and the potential presence of sensitive biological resources, including sensitive plant and wildlife species, sensitive plant communities, wetlands, and habitat for nesting birds. Watershed Environmental, Inc.

compiled an inventory of native plant and animal species observed during the site visits and conducted a literature review for baseline information on biological resources potentially occurring at the project site and surrounding area. The literature review included site-specific and surrounding reports, information in peer-reviewed journals, and standard and location-specific reference materials (Appendix D). A review of the California Native Plant Society rare plant database was conducted on October 10, 2025 by Rincon Consultants, Inc.

The following impact analysis is based on a combination of survey observations, literature review findings, and the proposed project design. The analysis considers the spatial extent and nature of project activities, including construction and long-term operation, in relation to known or potential biological resources. The analysis evaluates direct, indirect, and cumulative impacts using thresholds of significance derived from the *CEQA Guidelines* and County's 2024 *Environmental Thresholds and Guidelines Manual.*

Significance Thresholds

As described in more detail in Chapter 4, *Environmental Impact Analysis*, the following thresholds are based on Appendix G of the *CEQA Guidelines* which provides the following 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 2024 *Environmental Thresholds and Guidelines Manual* calls for assessing short- and long-term impacts. Pursuant to the County of Santa Barbara's 2024 *Environmental Thresholds Guidelines Manual*, significant impacts to species or habitats are 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).

- Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends.

The County's 2024 *Environmental Thresholds and Guidelines Manual* includes the following criteria specific to habitats within 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.
- **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 County's 2024 *Environmental Thresholds and Guidelines Manual* provides examples of areas in Goleta where impacts to habitat are presumed to be less than significant, including:

- Small acreages of nonnative grassland if wildlife values are low.
- Individuals or stands of nonnative 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.

4.3.3.2 Project Impacts and Mitigation Measures

Threshold 1:	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Impact BIO-1 PROJECT CONSTRUCTION HAS THE POTENTIAL TO RESULT IN DIRECT AND INDIRECT IMPACTS TO SANTA BARBARA HONEYSUCKLE, OCELLATED HUMBOLDT LILY, BLACK-FLOWERED FIGWORT, WESTERN RED BAT, AND NESTING BIRDS. WITH IMPLEMENTATION OF REGULATORY REQUIREMENTS AND MITIGATION MEASURES NOI-1 AND BIO-1 THROUGH BIO-6, THE PROJECT'S CONSTRUCTION IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION*. PROJECT OPERATION WOULD BE LIMITED TO RESIDENTIAL USES AND WOULD HAVE A CLASS III, *LESS THAN SIGNIFICANT,* IMPACT TO SPECIAL-STATUS SPECIES.

Special-Status Plant Species

As discussed in Section 4.3.1, *Regional Setting,* the only special-status plant species observed on the project site is Santa Barbara honeysuckle. Approximately 59 Santa Barbara honeysuckle shrubs were observed on the western edge of the project site, with a cluster of Santa Barbara honeysuckle shrubs

occurring in the southwestern portion of the project site, where the new 90-foot long section of storm drain pipe would tie into an existing buried storm drain pipe that discharges into El Encanto Creek. Two other special-status plant species, ocellated Humboldt lily and black-flowered figwort, have a moderate potential to occur on the project site.

Construction

Approximately 10 Santa Barbara honeysuckle plants would be removed during grading activities for project construction. Additionally, project construction would require the removal or disturbance of habitat for Santa Barbara honeysuckle, and may require the removal or disturbance of habitat for ocellated Humboldt lily and black-flowered figwort. Thus, the proposed project would potentially result in direct impacts to Santa Barbara honeysuckle, ocellated Humboldt lily, and black-flowered figwort, and such impacts would be potentially significant.

Indirect impacts to Santa Barbara honeysuckle, ocellated Humboldt lily, and black-flowered figwort may occur during project construction from adverse water quality effects, chemical spills or vehicle leaks near the special-status plants (if present), or dust generation. These impacts would be less than significant through implementation of standard construction BMPs specified in the SWPPP (such as erosion and sediment control BMPs designed to minimize erosion and retain sediment on-site, and good housekeeping BMPs to reduce the risk of spills, leaks, and off-site discharge of construction debris and waste), as well as standard fugitive dust control measures recommended by the Santa Barbara County Air Pollution Control District (such as vehicle speed limits, covering stockpiles, watering of disturbed soil, and minimizing construction activities during high winds).

Operation

Project operation would involve residential use of the project site. While the proposed project would increase human presence on the project site, such presence would be associated with residential and recreational uses (such as biking or walking along established paths, as well as recreational use of Lot 57), which would not have the potential to result in significant impacts to special-status plants. Operational impacts to vegetation would be limited to performance of routine landscape maintenance activities and fuel management activities, which would not involve the removal of special-status plants. Therefore, operation and maintenance impacts on special-status plants would be less than significant.

Special-Status Wildlife Species

As discussed in Section 4.3.1, *Regional Setting*, one special-status wildlife species, western red bat, has a moderate potential to roost and forage on-site. No special-status wildlife species have been observed on the project site, or have a high potential to occur on-site.

Construction Impacts

The proposed project would remove nonnative ornamental trees on the project site. If western red bats are roosting in these trees at the time of removal, this disturbance could result in displacement or temporary loss of roosting sites, resulting in a direct impact to the species. However, western red bat, if present on the project site, would likely roost in adjacent areas to the project site and continue foraging in these areas, particularly over the adjacent golf course and open spaces, which offer insect prey. The continued availability of foraging habitat would reduce the likelihood of long-term population-level effects associated with roost removal. Nevertheless, the potential removal of available roosting habitat would result in a potentially significant impact on western red bat.

Operational Impacts

Project operation would involve residential use of the project site, which is typically minimal during nighttime hours when humans are typically indoors and bats are active. Following the completion of construction activities, western red bat could roost in newly planted trees installed as landscaping allowing for foraging for insects on the project site. Raised and/or unshielded lighting on the exterior of new residential structures and new streetlights have potential to disrupt the bats' nocturnal behavior. However, all exterior lighting would be required to meet the City's Title 17 Chapter 17.35 Zoning Ordinance, which provides exterior night lighting and dark sky requirements designed to reduce impacts to wildlife. Compliance with these requirements would ensure that project-related lighting would not disrupt western red bat behavior. Operational impacts on western red bat would therefore be less than significant.

Nesting Birds

Migratory birds and raptor species may utilize the project site for roosting habitat. Nests of common raptor species are considered ESHA pursuant to the City of Goleta General Plan/Coastal Land Use Plan Policy CE 8.1 (City of Goleta 2006).

Construction Impacts

Direct impacts to migratory bird or raptor nests could occur during demolition of existing structures, removal of vegetation, and ground disturbing activities if nests are present at the time of project construction. Indirect impacts, such as increased noise, vibration, and human presence during construction (if it occurs within the nesting bird season) could result in nest disturbance, including nest abandonment and mortality of fledglings, at the project site or adjacent areas. Therefore, construction-related impacts would be potentially significant.

Operational Impacts

Project operation would involve residential use of the project site, including routine landscaping and tree maintenance. These activities are expected to be limited to standard residential upkeep such as irrigation and pruning of vegetation, but would not involve tree removal or substantial disturbance to mature vegetation. Although newly planted trees may eventually provide roosting or nesting habitat for migratory birds and raptors, maintenance activities would be conducted in accordance with existing federal and state regulations, including the Migratory Bird Treaty Act and California Fish and Game Code, which prohibit the disturbance of active nests. Therefore, operational impacts on nesting birds would be less than significant.

Mitigation Measures

Implementation of Mitigation Measure NOI-1, described in Section 4.10, *Noise*, is required. In addition, the following mitigation would be required:

BIO-1 Special-Status Plant Surveys and Avoidance

Prior to the start of construction activities, including vegetation removal, a City-approved, qualified biologist (retained by the project applicant) shall conduct a spring special-status plant survey within the areas of proposed ground disturbance. The survey shall be conducted during the appropriate season (March–April) and in suitable habitat to detect rare annual plant species (ocellated Humboldt lily [*Lilium humboldtii* ssp. *ocellatum*] and black-flowered figwort [*Scrophularia atrata*]) and additional

individuals of Santa Barbara honeysuckle (*Lonicera subspicata var. subspicata*) that may not have been observed during previous surveys conducted on June 20, July 11, July 21, August 22, November 3, and November 5, 2025 as part of the *Biological Assessment Report for the Shelby Residential Development Project* (Watershed Environmental, Inc. 2025). The survey shall be conducted in accordance with the CNPS Botanical Survey Guidelines (2001), CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (2018), and the USFWS General Rare Plant Survey Guidelines (Cypher 2002). Reference sites shall be visited to confirm detectability of target species prior to initiating the survey. Within 24 hours of completing the spring survey, the qualified biologist shall prepare and submit a brief letter report documenting the survey methods and results to the City of Goleta's Planning and Environmental Review Director, or designee, for review and approval.

A second pre-construction special-status plant survey shall be conducted by the qualified biologist no more than two weeks prior to the initiation of vegetation removal and construction activities. The biologist shall prepare a brief letter report summarizing the survey results within 24 hours of completing the survey and submit it to the City of Goleta's Planning and Environmental Review Director, or designee, for review and approval. If construction has not commenced within two years of the most recent survey, the special-status plant survey shall be repeated prior to the start of construction. If special status plant species are detected during the spring and/or pre-construction special status plant surveys, the project applicant shall implement Mitigation Measure BIO-2.

Plan Requirements and Timing. The spring and pre-construction special-status plant surveys shall be conducted by the qualified biologist prior to issuance of Zoning Clearance for the grading permit. The qualified biologist shall prepare and submit a brief letter report summarizing the results of each survey to the City of Goleta's Planning and Environmental Review Director within 24 hours of completing the survey. If construction has not commenced within two years of the most recent survey, the special-status plant survey shall be repeated prior to the start of construction.

Monitoring. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the survey results and maintain documentation on file.

BIO-2 Rare Plant Protection Plan

Prior to issuance of Zoning Clearance for the grading permit, the project applicant shall retain a City-approved, qualified biologist to prepare a Rare Plant Protection Plan for review and approval by the City of Goleta's Planning and Environmental Review Director, or designee. The Rare Plant Protection Plan shall focus on special-status species with potential to occur on-site (Santa Barbara honeysuckle, ocellated Humboldt lily, and black-flowered figwort) and shall include:

- Establishment of avoidance buffers for special-status plant species and habitat that supports special-status plants outside of the project's disturbance area.
- Specifications for temporary rare plant protection fencing (minimum 4 feet tall, metal posts spaced no more than 8 feet apart).
- Locations of fencing depicted on grading plans.
- "Rare Plant Protection Zone – Keep Out" signage posted at 20-foot intervals.
- Maintenance requirements to ensure fencing remains upright and effective throughout construction.

The qualified biologist shall inspect the fencing and signage and establish avoidance buffers prior to the start of construction and shall submit written confirmation to the City of Goleta's Planning and Environmental Review Director, or designee, that the fencing has been installed in accordance with the approved plan.

Plan Requirements and Timing. The Rare Plant Protection Plan shall be finalized by the qualified biologist and approved by the City of Goleta's Planning and Environmental Review Director, or designee, prior to issuance of Zoning Clearance for the grading permit. Fencing, signage, and avoidance buffers shall be installed by the qualified biologist prior to the start of construction and maintained throughout the duration of construction activities.

Monitoring. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the Rare Plant Protection Plan and restoration plan, maintain documentation on file, and conduct periodic inspections to ensure compliance with fencing, signage, and restoration requirements.

BIO-3 Habitat Restoration and Rare Plant Mitigation

Prior to issuance of Zoning Clearance for the grading permit, the project applicant shall retain a City-approved, qualified biologist to prepare a Habitat Restoration Plan consistent with the provisions of Goleta Municipal Code Section 17.30.030(D) to restore and mitigate impacts to native vegetation communities and special-status plant species. Restoration and mitigation shall occur on the project site if feasible. The plan shall provide for:

- Restoration of temporarily disturbed native vegetation (including black sage – California sagebrush scrub, arroyo willow thicket, and eucalyptus grove) at a minimum 1:1 ratio.
- Mitigation for permanent impacts to black sage – California sagebrush scrub, arroyo willow thicket, and eucalyptus grove at a minimum 3:1 ratio.
- Mitigation for removal of rare plant species, including Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), ocellated Humboldt lily (*Lilium humboldtii* ssp. *ocellatum*) and black-flowered figwort (*Scrophularia atrata*) at a minimum 10:1 ratio.

All plant materials used for restoration and mitigation shall be locally sourced from the Goleta or Devereux Slough watersheds or adjacent watersheds. The plan shall specify:

- Quantity, species, and container size of plant materials to be installed.
- Annual performance standards for vegetation growth, cover, and survival.
- Success criteria requiring a minimum of 85 percent native vegetation cover and/or rare plant survival after five years.
- Maintenance activities to support plant establishment and long-term viability.
- Frequency of biological monitoring (by the qualified biologist) and reporting requirements (to the City of Goleta's Planning and Environmental Review Director).

Plan Requirements and Timing. The Habitat Restoration Plan shall be submitted to the City of Goleta's Planning and Environmental Review Director, or designee, for review and approval prior to issuance of Zoning Clearance for the grading permit. Restoration and mitigation planting shall occur during the first planting season following completion of construction in impacted areas. Rare plant mitigation shall be implemented concurrently with native vegetation restoration.

Monitoring. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the Habitat Restoration Plan and maintain documentation on file. The qualified biologist shall conduct biological monitoring in accordance with the approved plan and submit status reports to the City of Goleta's Planning and Environmental Review Director for five years following installation. The City of Goleta's Planning and Environmental Review Director, or designee, shall conduct periodic inspections to verify compliance with restoration goals, including vegetation cover, species composition, and rare plant survival.

BIO-4 Biological Monitoring and Worker Education

Prior to initiation of construction activities, the project applicant shall retain a City-approved, qualified biologist familiar with special-status plant and wildlife species with the potential to occur in the project work area. The qualified biologist shall be present on-site daily during grading and vegetation removal. The monitor shall be responsible for the following:

- Ensure that procedures for verifying compliance with biological resource mitigation measures are followed.
- Lines of communication and reporting methods.
- Guiding the construction contractor in marking/flagging construction area limits.
- Conducting construction crew Worker Environmental Awareness Program (WEAP) training.
- Authority to stop non-emergency work.
- Action to be taken in the event of non-compliance.
- Conducting daily wildlife clearance surveys prior to any grading, turf removal, other vegetation removal.
- Inspecting ESHA fencing around sensitive habitats.
- Preparing monitoring summaries of special-status species' presence, or the lack thereof, on the project site during grading or vegetation removal.

All construction personnel shall attend a WEAP training conducted by the qualified biologist prior to commencement of construction activities. The construction contractor(s) shall be responsible for ensuring that all new personnel receive the training after construction is initiated. The WEAP shall include a description of a special-status species potentially present in the area, jurisdictional habitats present proximate to the project site, information on sensitive habitats to be avoided, and specific measures that shall be implemented to protect special-status species. Special-status plant species addressed in the WEAP training shall include, at a minimum, Santa Barbara honeysuckle, ocellated Humboldt lily, and black-flowered figwort. Species-status wildlife species addressed in the WEAP, at a minimum, shall include western red bat.

Plan Requirements and Timing. The qualified biologist shall be present on-site daily during grading and vegetation removal. This measure shall be incorporated into the grading plans and the WEAP shall be available on-site during construction. The qualified biologist shall submit a monitoring summary to the City of Goleta's Planning and Environmental Review Director within 30 days after completing each phase of construction.

Monitoring. Records of construction worker WEAP participation shall be kept on file with the City of Goleta's Planning and Environmental Review Director for the duration of construction. Monitoring summaries shall be kept on file with the City for the duration of construction.

BIO-5 Bat Roost Avoidance and Protection

To avoid disturbance to western red bats (*Lasiurus blossevillii*), ground disturbance and tree removal shall occur outside of the bat maternity season (April 1 to August 31). If ground disturbance or tree removal must occur during this period, the project applicant shall retain a City-approved, qualified biologist to conduct two nighttime acoustic bat surveys no more than two weeks prior to tree removal within the disturbance footprint, plus a 300-foot buffer. Surveys shall be conducted using ultrasonic microphones capable of detecting bat echolocation calls and shall last a minimum of one hour each. Survey conclusions shall be reviewed and approved by the City of Goleta's Planning and Environmental Review Director, or designee, prior to initiation of construction.

If bat activity is detected, the qualified biologist shall conduct a daytime visual inspection of trees for signs of active roosts, including guano, insect carcasses, or direct observation of bats. If any active roosts are found, the City-approved biologist shall establish a 100-foot buffer. The construction contractor shall ensure that no ground disturbance or tree removal occurs within the buffer until the City-approved biologist confirms the breeding season has concluded or the roost is no longer active and removes the buffer. If work within the buffer is necessary, a City-contracted biological monitor (funded by the project applicant) shall monitor the active roost full-time during construction activities within the buffer to ensure project activities are not indirectly impacting roosting bats.

Plan Requirements and Timing. Within 24 hours of completing the surveys (and prior to initiation of tree removal activities), the qualified biologist shall prepare a brief report summarizing the methods and results of the acoustic and visual bat surveys and submit it to the City of Goleta's Planning and Environmental Review Director.

Monitoring. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the bat survey results prior to commencement of tree removal activities and maintain documentation on file. The City of Goleta's Planning and Environmental Review Director shall conduct periodic inspections to ensure that tree removal activities comply with seasonal restrictions and avoidance measures for active bat roosts.

BIO-6 Pre-construction Nesting Bird Surveys and Avoidance

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, qualified biologist (retained by the project applicant) 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 City of Goleta's Planning and Environmental Review Director, or designee. Survey conclusions shall be reviewed and approved by the City of Goleta's 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 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 the City of Goleta's General Plan/Coastal Land Use Plan Policy CE 8.3. The buffer shall be 300 feet in compliance with the City of Goleta's General Plan/Coastal Land Use Plan Policy CE 8.4. If the 300-foot buffer is infeasible, the City-approved biologist may reduce the buffer distance as appropriate, depending 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 project applicant) 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 days prior to commencement of any demolition, grading, and/or vegetation removal activities. Survey conclusions shall be reviewed and approved by the City of Goleta's 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 City of Goleta's 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. The City of Goleta's Planning and Environmental Review Director, or designee, shall conduct periodic spot checks to ensure that construction does not occur within the buffer during construction.

Significance After Mitigation

Mitigation Measure NOI-1 would reduce potential indirect impacts to nesting birds during project construction by minimizing construction noise in compliance with existing City noise standards. Mitigation Measures BIO-1, BIO-2, and BIO-3 would reduce potential impacts to special-status plant species by requiring pre-construction special-status plant surveys and fencing around special-status plant habitat that would ensure avoidance of such habitat during construction activities (BIO-1), preparation and implementation of a Rare Plant Protection Plan (BIO-2), and preparation of implementation of a Habitat Restoration Plan that specifies mitigation for removal of rare plant species (BIO-3). Mitigation Measure BIO-4 would reduce potential impacts to special-status species, both plant and wildlife, by requiring biological monitoring during construction and construction worker environmental awareness training. Mitigation Measure BIO-4 would reduce potential impacts to all special-status species included in the above analysis. Mitigation Measure BIO-5 would reduce potential impacts to western red bat by requiring pre-construction surveys and roost avoidance, if detected. Mitigation Measure BIO-6 would reduce potential impacts to nesting birds and raptors by requiring pre-construction surveys and avoidance measures.

Following the implementation of Mitigation Measures NOI-1 and BIO-1 through BIO-6, the proposed project's construction impact involving a substantial adverse effect on special-status species or their habitat would be less than significant with mitigation incorporated.

Threshold 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?

Impact BIO-2 PROJECT CONSTRUCTION MAY RESULT IN DIRECT AND INDIRECT IMPACTS TO ARROYO WILLOW THICKET, BLACK SAGE – CALIFORNIA SAGEBRUSH SCRUB, AND EUCALYPTUS GROVE THAT SERVES AS RAPTOR ROOSTING HABITAT ESHA. FOLLOWING IMPLEMENTATION OF MITIGATION MEASURES BIO-3, BIO-4, AND BIO-7, THE PROJECT'S CONSTRUCTION IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION*. PROJECT OPERATION WOULD BE LIMITED TO RESIDENTIAL USES AND LANDSCAPING ACTIVITIES AND WOULD HAVE A CLASS III, *LESS THAN SIGNIFICANT,* INDIRECT IMPACT ON RIPARIAN HABITAT AND SENSITIVE NATURAL COMMUNITIES.

Indirect Construction Impacts on ESHA and ESHA Buffers

Indirect construction impacts to riparian habitat types and sensitive natural communities designated as ESHA would include adverse water quality effects, chemical spills or vehicle leaks near and within ESHA, and dust generation. These impacts are associated with trenching for the new 90-foot-long section of storm drain pipe in the southwestern portion of the project site , grading for the detention basin in the southwestern portion of the project site, vegetation trimming for the bike path along Cathedral Oaks Road, and building construction near the eucalyptus grove ESHA. These activities involve heavy equipment operation, soil disturbance, and potential use of hazardous materials in close proximity to sensitive habitats. Impacts related to dust would be minimized with implementation of standard fugitive dust control measures recommended by the Santa Barbara County Air Pollution Control District (such as vehicle speed limits, covering stockpiles, watering of disturbed soil, and minimizing construction activities during high winds). Risk of spills and water quality impacts would be reduced through implementation of standard construction BMPs specified in the SWPPP (such as erosion and sediment control BMPs designed to minimize erosion and retain sediment on-site, and good housekeeping BMPs to reduce the risk of spills, leaks, and off-site discharge of construction debris and waste). Additionally, as a Condition of Approval, the City would require that chemical storage, portable toilet placement, vehicle and/or equipment maintenance, and equipment refueling only occurs in designated staging areas located at least 100 feet from El Encanto Creek, which would minimize the risk of leaks or spills reaching surface waters. Therefore, indirect construction impacts would be less than significant.

Direct Construction Impacts on ESHA and ESHA Buffers

Direct impacts to arroyo willow thicket, black sage – California sagebrush scrub, and eucalyptus grove that serves as raptor roosting habitat ESHA, as well as the respective ESHA buffers, would include the construction of new structures or facilities within ESHA or ESHA buffers. The proposed project would directly impact native vegetation, including ESHA, in four areas: installation of a new storm drain pipe that would tie into an existing storm drain pipe in the southwestern portion of the project site; construction of a new bike path along Cathedral Oaks Road; grading in the southwestern corner of the project site to construct the detention basin; and grading and building construction within eucalyptus grove along El Encanto Creek. Impacts to these areas are discussed further below.

Storm Drain Pipe

The proposed storm drain pipe in the southwestern portion of the project site would be installed underground and would result in impacts to black sage – California sagebrush scrub ESHA during trenching activities. These impacts would include vegetation removal and soil disturbance within sensitive natural communities. According to the City of Goleta General Plan/Coastal Land Use Plan Policy CE 1.6 and Goleta Municipal Code Section 17.30.040, development within ESHA and ESHA buffers is generally prohibited unless the use is considered resource-dependent and is sited and designed to avoid or minimize impacts to the maximum extent feasible. As stipulated by City of Goleta General Plan/Coastal Land Use Plan Policy CE 1.6(d), utility structures, such as stormwater management systems, may be allowed within ESHA or buffers if they are necessary to protect public health and safety and if no feasible alternative exists outside of the ESHA. The storm drain pipe is a resource-dependent utility designed to manage stormwater runoff generated by impervious surfaces within the proposed development and to reduce downstream erosion and flooding. El Encanto Creek is the natural receiving water for stormwater in the vicinity of the project site, and the project site currently drains toward the creek under existing conditions. The proposed storm drain pipe would tie into an existing storm drain pipe that already discharges to El Encanto Creek. Due to topographic constraints and the location of the creek adjacent to the western boundary of the project site, there is no feasible alternative discharge location. Additionally, City of Goleta General Plan/Coastal Land Use Plan Policy CE 2.5 (Maintenance of Creeks as Natural Drainage Systems) emphasizes discharge to natural waterbodies, such as El Encanto Creek. The storm drain pipe has been sited and designed to minimize significant adverse impacts to riparian vegetation and the biological integrity of El Encanto Creek.

Bike Path

The proposed bike path would serve as a continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road, and would be constructed immediately north of Cathedral Oaks Road in the southern and southwestern portion of the project site, within arroyo willow thicket and black sage – California sagebrush scrub ESHA. The proposed bike path has been designed to follow an existing disturbed corridor to the extent possible. Construction of the proposed bike path would require continuous pruning of adjacent vegetation to prevent overgrowth onto the path, which would result in permanent impacts to ESHA. However, the City of Goleta General Plan/Coastal Land Use Plan Policy CE 1.6 and Goleta Municipal Code Section 17.30.040, which provide protection for ESHA and ESHA buffers against development, allow for resource-dependent uses (including public accessways and trails) that are sited to avoid or minimize impacts on the resource to the maximum extent feasible. As designed, the proposed bike path would minimize impacts to habitat value or sensitive species to the maximum extent feasible from the existing configuration.

Detention Basin

Construction of the detention basin would result in impacts (vegetation removal and soil disturbance from grading) to arroyo willow thicket ESHA and black sage – California sagebrush scrub ESHA in the southwestern portion of the project site. This location was selected for the detention basin because it is the lowest elevation point on the project site, which allows gravity-fed drainage from the surrounding development without the need for pumps or extensive underground infrastructure. The basin is designed to manage stormwater runoff and improve water quality, and is a resource-dependent utility that may be permitted within ESHA or buffers when no feasible alternative exists and when designed to minimize impacts. The basin would be located outside of the riparian corridor to the extent feasible. Locating the basin elsewhere on the project site would require substantial

regrading, increased disturbance to ESHA, or conflict with proposed residential lots and traffic circulation. Additionally, the southwestern corner of the project site is adjacent to El Encanto Creek, which is the natural receiving water for stormwater in the area.

Grading and Building Construction

Grading on Lots 1, 2, and 58 would disturb the eucalyptus grove that serves as raptor roosting habitat ESHA. However, all of the eucalyptus trees in the study area are rooted on the adjacent golf course property, and the proposed project is not expected to require removal of any eucalyptus trees unless they are determined to be structurally unsound and pose a safety hazard to construction workers and future residents and their guests. Impacts would be limited to removal of ornamental trees and shrubs and ruderal vegetation beneath the eucalyptus tree canopy.

Impacts would include disturbances, such as vegetation removal and soil disruption during construction, to this sensitive natural community. Grading is not anticipated to result in removal or major impacts to protected trees within the ESHA or alter the surface hydrology or remove native vegetation within the ESHA buffer, as it would be limited to surface-level modifications that avoid tree root zones and alterations to drainage patterns. Grading on Lots 1, 2, and 58 would impact 7,811 square feet of eucalyptus grove due to grading and vegetation removal. Additionally, the proposed project would impact 685 square feet of eucalyptus grove through habitat loss associated with permanent removal of understory vegetation associated with this ESHA.

Summary of Construction Impacts on ESHA

The proposed project would result in both indirect and direct impacts to riparian habitat types and sensitive natural communities designated as ESHA. Indirect impacts would include adverse water quality effects, chemical spills or vehicle leaks near and within ESHA, and habitat destruction during construction. Direct impacts would include the following permanent impacts:

- Impacts to 378 square feet of black sage – California sagebrush scrub ESHA due to trenching for the new storm drain pipe;
- Impacts to 8,496 square feet of eucalyptus grove that serves as raptor roosting habitat ESHA due to development on Lots 1, 2, and 58 for the proposed detention basin and residential development; and
- Impacts to 125 square feet of arroyo willow thicket ESHA and 82 square feet of black sage – California sagebrush scrub ESHA due to construction of the new bike path.

In total, the proposed project would permanently impact approximately 9,081 square feet (0.21 acre) of ESHA. The overall project-related impact on riparian habitat and sensitive natural communities would be potentially significant.

Operational Impacts on ESHA and ESHA Buffers

Operation and maintenance of the proposed project would involve residential use of the project site and maintenance of landscape vegetation. These activities include the use of landscaping chemicals, such as fertilizers and pesticides, which have the potential to affect adjacent ESHA through runoff. Operational activities would be conducted in accordance with Goleta Municipal Code Section 17.030.060 (Management of ESHAs), which prohibits the use of insecticides, herbicides, artificial fertilizers, or other toxic chemical substances within and adjacent to ESHA. Additionally, the proposed detention basin is designed to capture and treat runoff before it reaches ESHA. Therefore, operational

activities would have a less than significant impact on riparian habitat types and sensitive natural communities.

Mitigation Measures

Mitigation Measures BIO-3 and BIO-4 as described in Impact BIO-1 are required. In addition, the following mitigation would be required:

BIO-7 Protection of Environmentally Sensitive Habitat Areas

Construction methods shall include hand-trimming of vegetation rather than removal where feasible. The project applicant shall retain a City-approved, qualified biologist who shall install temporary construction fencing between the ESHA area that would be disturbed (during installation of the new storm drain pipe, construction of the new bike path along Cathedral Oaks Road, grading in the southwestern corner of the project site to construct the detention basin, and grading and building construction within eucalyptus grove along El Encanto Creek) and the adjacent ESHA to be protected. The fencing shall be a minimum of 4 feet tall, attached to metal fence posts spaced no more than 8 feet apart, and shall include "Environmentally Sensitive Habitat Area – Keep Out" signage posted at 20-foot intervals. The fencing and signage shall be installed prior to the start of construction activities and shall be maintained in an upright and functional condition for the duration of construction in these areas. No construction activities shall occur in the fenced ESHA designated to be protected.

Plan Requirements and Timing. Specification for hand-trimming of vegetation, as well as the location and specifications of the temporary construction fencing, shall be included in the final construction plans and reviewed by the City of Goleta's Planning and Environmental Review Director, or designee, prior to issuance of Zoning Clearance for the grading permit. Fencing and signage shall be installed prior to any ground disturbance and maintained throughout the duration of construction activities in proximity to Environmentally Sensitive Habitat Area.

Monitoring. The qualified biologist shall install the fencing and signage prior to the start of construction and confirm proper installation by writing to the City of Goleta's Planning and Environmental Review Director. The City of Goleta's Planning and Environmental Review Director shall conduct periodic inspections to ensure vegetation is hand-trimmed where feasible and fencing remains in place and in good condition throughout construction.

Significance After Mitigation

Mitigation Measure BIO-3 would reduce potential impacts to riparian habitat and sensitive vegetation communities by requiring compensatory mitigation for habitat loss due to project development. Mitigation Measures BIO-4 and BIO-7 would reduce potential indirect impacts to riparian habitat and sensitive vegetation communities during project construction by requiring biological monitoring during construction and construction worker environmental awareness training (BIO-4) and fencing around ESHA (BIO-7). Following the implementation of Mitigation Measures BIO-3, BIO-4, and BIO-7, the proposed project's impact involving a substantial adverse effect on riparian habitat and sensitive vegetation communities would be less than significant with mitigation incorporated.

Threshold 3:	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact BIO-3 PROJECT CONSTRUCTION MAY RESULT IN A POTENTIALLY SIGNIFICANT IMPACT TO RIPARIAN HABITAT ASSOCIATED WITH EL ENCANTO CREEK, WHICH MAY BE A JURISDICTIONAL RESOURCE. FOLLOWING IMPLEMENTATION OF MITIGATION MEASURES BIO-3 AND BIO-4, THE PROJECT'S CONSTRUCTION IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION*. PROJECT OPERATION WOULD BE LIMITED TO RESIDENTIAL USES AND LANDSCAPING ACTIVITIES AND WOULD HAVE A CLASS III, *LESS THAN SIGNIFICANT,* IMPACT ON JURISDICTIONAL RESOURCES.

No wetland resources occur on the project site, and no features on the project site meet the State or City wetland definition (i.e., do not support wetland soil, hydrology, or plants). El Encanto Creek, which is part of the Devereux Slough watershed, flows through the southwestern portion of the project site. The United States Geological Survey has mapped El Encanto Creek as having intermittent flow, although portions of the creek within the Glen Annie Golf Course and adjacent to the project site may have perennial flow in normal to wet years due in part to surface or subsurface irrigation runoff from the Glen Annie Golf Course. No work would occur within El Encanto Creek, and no resources under the jurisdiction of USACE would be impacted by the proposed project. However, the proposed project would include the construction of a new bike path that would entail the permanent removal of arroyo willow thicket ESHA, which is identified as riparian habitat and a sensitive natural community potentially under the jurisdiction of CDFW and the Central Coast RWQCB. As a Condition of Approval, the City of Goleta would require the project applicant to coordinate with CDFW and the Central Coast RWQCB and obtain applicable permits (e.g., Lake and Streambed Alteration Agreement, Clean Water Act Section 401 Water Quality Certification) as determined appropriate by the resource agencies. These permits would require the applicant to implement avoidance and minimization measures, provide compensatory mitigation for permanent impacts to riparian habitat, and comply with all applicable water quality protection standards and habitat restoration requirements as specified by the permitting agencies. Although these permits would minimize impacts by requiring avoidance and minimization measures, compensatory mitigation, and compliance with water quality and habitat restoration standards, impacts to this riparian habitat and potentially jurisdictional resource would nevertheless remain potentially significant due to the direct, permanent removal of the riparian habitat.

The proposed project would potentially result in indirect impacts to El Encanto Creek due to the potential to introduce sediment, construction debris, or pollutants (e.g., fuels, lubricants) into the creek during adjacent ground disturbance and equipment operation. Such contaminants could degrade water quality, harm aquatic habitat, and affect downstream resources within the Devereux Slough watershed. Risk of spills and water quality impacts would be reduced through implementation of standard construction BMPs specified in the SWPPP, such as erosion and sediment control BMPs designed to minimize erosion and retain sediment on-site, and good housekeeping BMPs to reduce the risk of spills, leaks, and off-site discharge of construction debris and waste. Therefore, indirect impacts to El Encanto Creek would be less than significant.

Operation and maintenance of the proposed project would involve residential use of the project site and maintenance of landscape vegetation. These activities include the use of landscaping chemicals, such as fertilizers and pesticides, which have the potential to affect adjacent surface waters through runoff. Operational activities would be conducted in accordance with Goleta Municipal Code Section

17.030.060 (Management of ESHAs), which prohibits the use of insecticides, herbicides, artificial fertilizers, or other toxic chemical substances within and adjacent to ESHA, which surrounds El Encanto Creek. Additionally, the proposed detention basin is designed to capture and treat runoff before it reaches El Encanto Creek. Therefore, operational activities would have a less than significant impact on aquatic resources.

Mitigation Measures

Mitigation Measures BIO-3 and BIO-4 described in Impact BIO-1 are required.

Significance After Mitigation

Mitigation Measure BIO-3 would reduce potential impacts to jurisdictional resources by requiring compensatory mitigation for habitat loss due to project development. Mitigation Measure BIO-4 would reduce potential indirect impacts to jurisdictional resources during project construction by requiring biological monitoring during construction and construction worker environmental awareness training (BIO-4). Following the implementation of Mitigation Measures BIO-3 and BIO-4, the proposed project's impact involving a substantial adverse effect on jurisdictional resources would be less than significant with mitigation incorporated.

Threshold 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?

Impact BIO-4 **PROJECT CONSTRUCTION WOULD HAVE THE POTENTIAL TO RESULT IN SUBSTANTIAL DISTURBANCES TO WILDLIFE MOVEMENT THROUGH THE INTRODUCTION OF NOISE, WHICH WOULD BE A POTENTIALLY SIGNIFICANT IMPACT. CONSTRUCTION IMPACTS RELATED TO LIGHT AND INCREASED HUMAN PRESENCE WOULD NOT BE SUBSTANTIAL. WITH IMPLEMENTATION OF MITIGATION MEASURE NOI-1, THE PROJECT'S CONSTRUCTION IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*. PROJECT OPERATION WOULD NOT SUBSTANTIALLY INTERFERE WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES, AND IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT.***

As discussed in Section 4.3.1.3, *Wildlife Corridors and Habitat Linkages*, the project site is surrounded by residential development and the Glen Annie Golf Course, and fenced with a six-foot-tall chain-link fence with one opening along Cathedral Oaks Road. The perimeter fence around the project site effectively prevents large mammals from entering the project site. Given the habitat and vegetation types present on the project site, and lack of essential wildlife resources such as food, water, and shelter, wildlife utilization of the project site is very low and likely limited to a few common resident species of amphibians, small mammals, reptiles, and common migratory and resident birds. El Encanto Creek, to the west of the project site, has the potential to serve as a wildlife corridor between open space to the north and the Pacific Ocean to the south, but such potential has been greatly reduced over time due to urban development south of the project site. Project construction could indirectly affect wildlife movement through the introduction of noise, light, and increased human presence, all of which could affect essential behavioral activities and physiology of wildlife.

Noise

Construction noise may affect essential behavioral activities of wildlife, including through nest/roost abandonment, interference with behavior, permanent injury to the auditory system, or masking of

important sounds or sound components. Short-term construction and long-term operational noise could affect western red bat, along with common migratory and resident wildlife. Animal species differ greatly in their response to noise of various characteristics and duration. An individual animal's response to a given noise event or series of events also can fluctuate due to a variety of factors, including the time of day and year, the physical condition of the animal, the 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). 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). As discussed in Section 4.10, *Noise*, construction noise levels may exceed Goleta's 65 decibel construction noise standard, which could result in a potentially significant impact to wildlife movement. However, terrestrial wildlife migration is most pronounced during dusk, nighttime, and dawn. Construction activities would adhere to typical working hours in accordance with Section 17.39.070 of the City's Zoning Code, which limits construction activities from Monday to Friday, 7:00 a.m. to 4:00 p.m., and construction noise would not affect nocturnal terrestrial wildlife movement. Nevertheless, potential impacts on diurnal wildlife movement from construction-related noise would be potentially significant.

As discussed in Section 4.10, *Noise*, operational noise levels would not exceed the City's 65-decibel noise standard and would be limited to residential sources, such as heating, ventilating, and air conditioning units. Impacts on wildlife movement from operational noise would be less than significant.

Light

Lighting may affect essential behavioral activities, physiology, population ecology, and ecosystems of both diurnal and nocturnal wildlife. Proposed project construction would not occur during evening or nighttime hours in accordance with Section 17.39.070 of the Goleta Municipal Code, which limits construction activities from Monday to Friday, 8:00 a.m. to 5:00 p.m. Thus, the proposed project would not introduce new light sources to the project site during the construction time period. Impacts on wildlife movement as a result of construction lighting would be less than significant.

The proposed project would introduce new sources of light from the new residences, roadways, and parking areas (e.g., driveways). Proposed project lighting would be designed in accordance with City standards, including the City of Goleta's General Plan/Coastal Land Use 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). All night/ambient lighting on streets and homes along the western boundary of the project site (adjacent to El Encanto Creek) would be directed away from the creek in accordance with City of Goleta General Plan/Coastal Land Use Plan Policy VH 4.12(a). Moving sources of light would include headlights of vehicles driving on roadways near the project site, such as Cathedral Oaks Road, and entering or exiting the project site at night. 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 residential and recreational vehicles are frequent in the area, given the site's proximity to Cathedral Oaks Road and the Glenn Annie Golf Course. Therefore, impacts on wildlife movement as a result of operational project lighting would be less than significant.

Human Presence

Project construction would result in increased human presence, including construction workers, at the project site. However, project construction would not occur during evening or nighttime hours in accordance with Section 17.39.070 of the Goleta Municipal Code, which limits construction activities from Monday to Friday, 8:00 a.m. to 5 p.m. Many wildlife species are nocturnal or crepuscular[3], and are typically resting or hiding during the day when construction activities occur. Therefore, increased human presence during construction would be unlikely to substantially interfere with wildlife movement, and construction impacts would be less than significant.

Project operation would introduce residential uses and increase human activity. However, the project site is not a designated wildlife corridor. Although a portion of El Encanto Creek extends onto the western edge of the project site, its potential to serve as a wildlife movement corridor has been greatly reduced over time due to urban development south of the project site, and the creek itself is not proposed for development or alteration beyond the installation of a storm drain outlet. Construction of the storm drain outlet would not involve channelization, culverting, or other modifications that would impede wildlife movement. No fencing or structures would block access to the creek. Furthermore, the creek corridor would remain vegetated and connected to upstream and downstream open space areas, preserving its function as a movement corridor for small mammals, amphibians, reptiles, and birds. Therefore, operational impacts to wildlife movement would be less than significant.

Mitigation Measures

Implementation of Mitigation Measure NOI-1, described in Section 4.10, *Noise*, is required.

Significance After Mitigation

Mitigation Measure NOI-1 would reduce potential indirect impacts to wildlife movement during project construction by minimizing construction noise in compliance with existing City noise standards, which are set to a threshold below noise levels known to produce adverse physiological effects in wildlife (Fletcher 1971). Following the implementation of Mitigation Measure NOI-1, the proposed project's impact to wildlife movement would be less than significant.

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

Impact BIO-5 THE PROPOSED PROJECT WOULD BE POTENTIALLY INCONSISTENT WITH CITY OF GOLETA GENERAL PLAN/COASTAL LAND USE PLAN POLICIES CE 1.6, CE 1.9, CE 2.3, CE 5.3, AND CE 9.5, AS WELL AS THE GOLETA MUNICIPAL CODE, AS PROJECT CONSTRUCTION WOULD POTENTIALLY IMPACT ESHA, ESHA AND SPA BUFFERS, AND PROTECTED TREES. FOLLOWING IMPLEMENTATION OF MITIGATION MEASURES BIO-3, BIO-4, BIO-7, AND BIO-8, THE PROPOSED PROJECT WOULD BE INCONSISTENT WITH POLICIES CE 1.9 AND CE 2.3 BUT THE PROPOSED PROJECT'S IMPACT INVOLVING CONFLICT WITH LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION*.

The project would result in potentially significant impacts to special-status plants and special-status wildlife (Impact BIO-1), ESHA and other sensitive natural communities (Impact BIO-2), and aquatic resources (Impact BIO-3). Local policies or ordinances that protect biological resources that would

[3] "Crepuscular" refers to increased activity during the twilight hours (before sunrise and after sunset).

pertain to the project include policies within the City of Goleta General Plan/Coastal Land Use Plan and Goleta Municipal Code.

The proposed project would be consistent with the City of Goleta's General Plan/Coastal Land Use Plan Policy CE 1.3, Site-Specific Studies and Unmapped ESHAs; Policy CE 1.8, ESHA Buffers; Policy CE 2.1, Designation of Protected Creeks; Policy CE 2.5, Maintenance of Creeks as Natural Drainage Systems; Policy CE 8.1, ESHA Designation; Policy CE 8.2, Protection of Habitat Areas; Policy CE 8.3, Site-Specific Biological Resources Study; Policy CE 8.4, Buffer Areas for Raptor Species; and Policy CE 9.1, Definition of Protection Trees. Refer to Impact LU-2 in Section 4.9, *Land Use and Planning*, Subsection 4.9.3, *Impact Analysis*, for a full analysis of the project's consistency with the above-mentioned policies.

Policy Inconsistency Related to ESHA Impacts

The proposed project would potentially be inconsistent with the City of Goleta General Plan/Coastal Land Use Plan Policy CE 1.6 (Protection of ESHAs) and Policy CE 5.3 (Protection of Coastal Bluff Scrub, Coastal Sage Scrub, and Chaparral ESHA), as well as Section 17.30.040 (Development and Mitigation of Impacts) of the Goleta Municipal Code. These policies and code section collectively prohibit development within ESHAs and their buffers unless the use is resource-dependent and no feasible alternative exists, and require that any permitted encroachments be sited and designed to avoid or minimize impacts to the maximum extent feasible.

The proposed project would permanently impact 9,081 square feet (0.21 acre) of ESHA due to trenching, grading, and residential development on the project site. Policy CE 1.6 prohibits development within ESHAs and buffers unless the use is compatible with maintaining habitat values. The proposed residential development and grading within the SPA buffer are not resource-dependent uses and therefore conflict with this policy. Policy CE 5.3 requires a minimum 25-foot buffer around coastal sage scrub ESHA, which would be encroached upon by the detention basin and bike path. The permanent loss of ESHA would result in a potential inconsistency with Policies CE 1.6 and CE 5.3 and Section 17.30.040 (Development and Mitigation of Impacts) of the Goleta Municipal Code. This impact would be potentially significant.

Policy Inconsistency Related to SPA Impacts

The proposed project would potentially be inconsistent with the City of Goleta General Plan/Coastal Land Use Plan Policy CE 2.2 (Streamside Protection Areas) and Policy 2.3 (Allowable Uses and Activities in Streamside Protection Areas), as well as Section 17.30.070 (Streamside Protection Areas) of the Goleta Municipal Code. Pursuant to City of Goleta General Plan/Coastal Land Use Plan Policy CE 2.2, an SPA upland buffer associated with El Encanto Creek extends 100 feet on either side of the creek. Approximately 1.12 acres (49,148 square feet) of the El Encanto Creek SPA buffer occur on the project site. The project applicant would utilize a waiver under State Density Bonus Law (Government Code Section 65915) to encroach within the required 100-foot-wide SPA upland buffer, which is established by General Plan/Coastal Land Use Plan Policy CE 2.2 and Goleta Municipal Code Section 17.30.070. The encroachment would allow the following activities within the SPA buffer on the western side of the project site:

- 7,786 square feet of proposed residential development, which includes portions of the houses on proposed Lots 1 and 2, along with some or all the private rear yards of Lots 1 through 8;
- Trenching for a new, 90-foot-long storm drain pipe;

- 11,283 square feet of proposed stormwater detention; and
- A meandering path, landscaping, and 65 linear feet of sidewalk.

General Plan/Coastal Land Use Plan Policy CE 2.2 and Goleta Municipal Code Section 17.30.070 allow for site-specific reductions to the 100-foot buffer under limited circumstances. A reduction may be granted only if the following two criteria are met:

1. No feasible alternative siting for development exists that would avoid encroachment into the SPA upland buffer; and
2. The proposed development would not result in significant adverse effects on streamside vegetation or the biotic quality of the stream.

The minimum allowable buffer width under a reduced SPA is 25 feet, and any reduction must be supported by substantial evidence demonstrating compliance with the above criteria. The proposed encroachments include resource-dependent utility use, public access improvements, and residential development. The storm drain pipe and stormwater detention basin are utility features designed to manage runoff and improve downstream water quality. When sited and designed to avoid significant impacts to streamside vegetation and hydrology, such facilities may be considered consistent with SPA policies. The meandering path and public sidewalk are public access features that support alternative transportation and recreational use. These are considered resource-dependent uses under General Plan/Coastal Land Use Plan Policy CE 1.6 and are conditionally allowed within SPA buffers when designed to minimize impacts on sensitive resources.

The residential development and associated grading within the SPA buffer, including portions of Lots 1 through 8, are not resource-dependent uses. However, the proposed encroachment of residential structures and grading into the 100-foot SPA upland buffer meets the two-part test for buffer reduction under General Plan/Coastal Land Use Plan Policy CE 2.2 and Goleta Municipal Code Section 17.30.070, as follows:

1. No Feasible Alternative Siting. The proposed project would include affordable housing, and as such qualifies for a waiver under State Density Bonus Law (Government Code Section 65915) , including reducing SPA buffer requirements. The waiver is necessary to accommodate the density and configuration of the project. Site constraints, including the location of El Encanto Creek and other environmental setbacks, limit the developable area. Relocating the affected residential structures outside the SPA buffer would reduce the number of units or compromise site functionality, thereby conflicting with the project's objectives to develop up to 56 residential units, expand the City's housing stock consistent with the adopted 2023–2031 Housing Element, and provide housing opportunities for extremely low, lower, and moderate income households to support compliance with Regional Housing Needs Allocation requirements. Therefore, no feasible alternative siting exists that would avoid buffer encroachment while meeting the project's land use and housing objectives.
2. No Significant Adverse Effects on Streamside Resources. The encroachments would be limited in scale and would primarily occur outside the creek channel and riparian vegetation. The project would include stormwater management features (e.g., detention basin) that reduce runoff and protect water quality. Construction would include the implementation of BMPs to minimize erosion and sedimentation in accordance with the National Pollutant Discharge Elimination System Construction General Permit. As designed, the proposed project would not significantly degrade streamside vegetation, hydrology, or habitat quality.

Therefore, the proposed encroachments are consistent with General Plan/Coastal Land Use Plan Policy CE 2.2 and Goleta Municipal Code Section 17.30.070.

The proposed project would be inconsistent with City of Goleta General Plan/Coastal Land Use Plan Policy CE 2.3, which specifically limits allowable uses in SPAs to resource-dependent activities. Residential development is not listed among the permitted uses, and is therefore considered inconsistent with this policy. While the proposed project would be inconsistent with Policy CE 2.3, such conflict does not inherently result in a significant environmental impact under CEQA. CEQA significance is determined by whether a conflict with a plan would lead to a substantial adverse physical change in the environment. In this case, the inconsistency is limited to the type of development (i.e., residential use) rather than the extent or severity of physical impacts, which are addressed through mitigation measures and site design. The proposed residential development within the SPA buffer has been sited and designed to minimize impacts to riparian vegetation, would not involve protected tree removal, and would not result in significant degradation of streamside habitat or hydrology. Therefore, the proposed project's impact involving conflicts with policies related to SPAs (Policies CE 2.2 and CE 2.3) would be less than significant.

Policy Inconsistency Related to Land Divisions

The proposed project would involve land divisions for parcels within and adjacent to ESHA and would require development within ESHA or ESHA buffers, and would thus conflict with City of Goleta General Plan/Coastal Land Use Plan Policy CE 1.9 (Standards Applicable to Development Projects). Policy CE 1.9 establishes specific standards for development projects that may affect ESHA, including requirements to avoid ESHA impacts wherever feasible, maintain adequate buffers, and implement mitigation measures when avoidance is not possible. Policy CE 1.9(b) explicitly prohibits land divisions that would result in future development within ESHA or ESHA buffers unless the use is resource-dependent and sited to minimize impacts.

The proposed project would include the subdivision of land and siting of residential lots that would result in grading, landscaping, and construction within mapped ESHA and SPA buffer areas. These uses are not considered resource-dependent, and the resulting parcel configuration would permanently alter ESHA and reduce buffer integrity. Therefore, the proposed project would conflict with the intent and requirements of Policy CE 1.9, which is designed to prevent incremental loss of sensitive habitat through subdivision and development. This impact would be potentially significant.

Policy Inconsistency Related to Protected Trees

The proposed project would potentially be inconsistent with the City of Goleta General Plan/Coastal Land Use Plan Policy CE 9.5, Mitigation of Impacts to Native Trees, as well as the City's Urban Forest Management Plan and Goleta Municipal Code Chapter 15.09 (Grading, Erosion and Sediment Control) and its Appendix A (Grading Ordinance Guidelines for Native Oak Tree Removal). The City's Urban Forest Management Plan emphasizes the preservation of native trees and outlines best practices for their protection during development. Goleta Municipal Code Chapter 15.09 (Grading, Erosion and Sediment Control) and its Appendix A (Grading Ordinance Guidelines for Native Oak Tree Removal) require that grading near native oaks be minimized and that protective measures, such as fencing, arborist oversight, and root zone preservation, be implemented during construction. While no native trees are located directly on the project site, three protected coast live oak trees have canopies and/or critical root zones that extend onto the project site. Although the project would avoid direct removal or substantial disturbance of these trees, construction activities within their critical root zones could result in indirect impacts, such as soil compaction or root damage, if appropriate protection measures

are not implemented. Therefore, the proposed project would potentially conflict with City of Goleta's General Plan/Coastal Land Use Plan Policy CE 9.5, the City's Urban Forest Management Plan, and Goleta Municipal Code Chapter 15.09 (Grading, Erosion and Sediment Control), and the proposed project's impact involving conflict with this policy would be potentially significant.

Mitigation Measures

Mitigation Measures BIO-3 and BIO-4 as described under Impact BIO-1 are required. Mitigation Measure BIO-7 as described under Impact BIO-2 is required. In addition, the following mitigation would be required:

BIO-8 Tree Protection Measures

The construction contractor shall implement the following tree protection measures to ensure that impacts to protected trees, including native coast live oak trees outside of the project site, are minimized to the extent feasible or avoided, consistent with the City of Goleta's General Plan/Coastal Land Use Plan Policy CE 9.5, the City's Urban Forest Management Plan, and Goleta Municipal Code Chapter 15.09 (Grading, Erosion and Sediment Control), prior to the start of project construction. The following tree protection measures shall be included within the project construction plans, including the grading and landscaping plans. All measures below shall be conducted by or under the direct supervision of an International Society of Arboriculture (ISA) certified arborist retained by the project applicant:

Prior to Construction

- A certified arborist or qualified biologist under the supervision of the certified arborist shall monitor any ground disturbance, vegetation removal, and fencing installation activities that have a potential to impact the protected trees.
- Temporary fencing such as snow fencing, not less than 3 feet high with tree protection signs shall be erected around the three protected trees to be preserved that have a potential to be impacted during construction. The protective fence shall be installed at the protected zone boundary of each tree, which is defined as the critical root zone. The contractor shall maintain the fence to keep it upright, taut and aligned during active construction. Fencing shall be in place and inspected by a City approved biologist prior to the start of activities with the potential to impact protected trees. Fencing shall be removed only after all construction activities with the potential to impact the protected trees are complete.
- A pre-construction meeting shall be held between all contractors (including grading, tree removal/pruning, builders, etc.) and the project arborist. The meeting shall focus on instructing the contractors on tree protection practices. All equipment operators and spotters, assistants, or those directing operators from the ground shall provide written acknowledgement of their receiving tree protection training. This training shall include information on the location and marking of the protected trees, the necessity of preventing damage, and the discussion of work practices that will accomplish such.

Protection and Maintenance During Construction

- Contractors shall avoid heavy equipment operations, grade changes, ponding water, and fill or compaction within the protected tree zone unless where specifically approved and under the supervision of a certified arborist or qualified biologist in direct communication with the certified arborist.

- Contractors shall ensure that damage to the tree be avoided to the extent feasible when transporting or moving construction materials and working within or adjacent to the protected zone). If contact with the tree crown is unavoidable, affected branches may be pruned by a qualified arborist under supervision of a certified arborist and shall adhere to industry standards.
- Except where specifically approved in writing beforehand, all trenching shall be done outside of the fenced protected zone. Where trenching is necessary in areas that contain roots from retained trees, contractors should use trenching techniques that include the use of either a root pruner or an Air-Spade to limit root impacts. A certified arborist or qualified biologist in direct communication with the certified arborist shall ensure that all pruning cuts be clean and sharp to minimize ripping, tearing, and fracturing of the root system. Use of both root-pruning and Air-Spade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench should be made no deeper than necessary, and when possible, alternatives to trenching should be utilized.
- The contractor shall be responsible for irrigating (deep watering) the trees in the summer and fall irrigation as necessary and determined by a certified arborist. One irrigation cycle shall thoroughly soak the root zones of the trees to a depth of two feet. The soil shall be allowed to dry out between watering to avoid keeping consistently wet soil. Soil moisture shall be checked with a soil probe before irrigating. The area within three feet of the trunk shall never be soaked, especially in summer months.
- If any protected trees are damaged to the point where continued viability is threatened, as determined by a certified arborist, the tree shall be replaced at a 3:1 ratio with like species grown from locally obtained seed. Replacement shall occur on site as feasible, or off site (within the same watershed) if on site replacement is not feasible. Replacement trees shall be monitored for a period of five years.

Maintenance After Construction

- The contractors shall ensure that the mulch is kept a minimum one foot away from the trunk base and no more than 8 inches deep to avoid creating conditions favorable to the establishment and growth of decay-causing fungal pathogens.

Plan Requirements and Timing. The project applicant shall submit the construction plans that include the tree protection measures to the City of Goleta's Planning and Environmental Review Director for review and approval prior to issuance of Zoning Clearance for the grading permit.

Monitoring. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the construction plans to ensure this measure is included. The City of Goleta's Planning and Environmental Review Director, or designee, shall approve the arborist prior to Zoning Clearance for the grading permit.

Significance After Mitigation

Mitigation Measure BIO-3 would reduce potential permanent impacts to ESHA by requiring compensatory mitigation for habitat loss due to project development. Mitigation Measures BIO-4 and BIO-7 would reduce potential indirect impacts to riparian ESHA during project construction by requiring biological monitoring during construction and construction worker environmental awareness training (BIO-4) and fencing around ESHA (BIO-7). Mitigation Measure BIO-8 would reduce potential impacts to protected trees by requiring implementation of tree protection measures during project construction activities. Following the implementation of Mitigation Measures BIO-3, BIO-4,

BIO-7, and BIO-8, the proposed project would be consistent with the City of Goleta's General Plan/Coastal Land Use Plan Policies CE 1.6, CE 5.3, and CE 9.5, as well as the City's Urban Forest Management Plan, and Goleta Municipal Code Chapter 15.09 (Grading, Erosion and Sediment Control). The proposed project's impact involving conflict with any local policies or ordinances protecting biological resources would be less than significant with mitigation incorporated. The proposed project would remain inconsistent with Policies CE 1.9 and 2.3; however, these inconsistencies are related to policy-level misalignments and the environmental impacts of development within ESHA and SPA buffers would be reduced to a less than significant level with implementation of the abovementioned mitigation measures, and thus would not result in a significant impact on the environment.

Threshold 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?

Impact BIO-6 THE PROPOSED PROJECT IS NOT WITHIN THE JURISDICTION OF 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 site is not subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (CDFW 2023). Therefore, the proposed project would not conflict with these plans. No impact would occur.

Mitigation Measures

No mitigation measures are required.

4.3.4 Cumulative Impacts

The geographic scope of the cumulative analysis includes the City of Goleta and adjacent unincorporated areas of Santa Barbara County. This area was selected because it encompasses the same ecological region, shares similar habitat types, and supports overlapping wildlife populations. This geographic scope is appropriate given the diversity of sensitive habitats within the City and transient nature of wildlife movement, as well as the project site's location at the edge of City limits. The cumulative analysis considers projects listed within the City of Goleta's Cumulative Project List, City of Goleta's current Capital Improvements Program projects, California Department of Transportation roadway projects occurring within Goleta, and known nearby projects in the County of Santa Barbara with potential to combine with proposed project impacts to result in a cumulative impact. Past, present, and reasonably foreseeable future projects include the projects listed in Table 3-1 in Chapter 3, *Related Projects*. The cumulative projects listed in Table 3-1 would consist of construction of a total of 534 residential units, 440,599 square feet of industrial space (automotive service facilities, industrial buildings, distribution/delivery facilities, indoor/outdoor storage, and a repurposed hangar building), and 163,930 square feet of commercial space (shopping center improvements, automotive dealerships, a golf pro shop, a coffee shop, and office facilities). Cumulative projects also include oil and gas infrastructure removal, animal shelter renovations, construction and renovation of medical facilities, parkland improvements, one synagogue, one church, hotel renovations, battery energy storage infrastructure, restoration and habitat management activities, and various roadway improvements. In addition, while not within the City of Goleta, the Santa Barbara County Board of Supervisors approved a rezone of the Glen Annie Golf

Course for the development of 800 to 1,000 residential units as part of the County's 2023-2031 Housing Element Update.

Cumulative development in the City of Goleta would have the potential to disturb special-status species, riparian habitats, sensitive natural communities, wetlands, and wildlife movement. Existing City policies as well as federal and State regulations would protect special-status species, riparian habitats, sensitive natural communities, wetlands, and wildlife movement during the course of cumulative project development. Individual development proposals are reviewed separately by the City and must undergo environmental review when it is determined that the potential for significant impacts exists. Cumulative projects listed in Table 3-1 in Chapter 3, *Related Projects*, would be required to implement mitigation measures, similar to the proposed project, if it is determined that significant impacts for individual cumulative projects would occur. Nevertheless, cumulative development may have a potentially significant cumulative impact on biological resources, given the scope of anticipated development.

The proposed project includes specific mitigation measures to avoid and minimize impacts to biological resources, including pre-construction surveys for nesting birds and special-status species and mitigation for impacts to ESHA. The proposed project would not result in degradation or fragmentation of habitat that could substantially impact special-status species or wildlife movement; would maintain ecological connectivity and avoid direct impacts to ESHA and the SPA buffer to the maximum extent feasible; and would comply with applicable biological resource protection policies to the extent feasible. Therefore, the proposed project would not have a considerable contribution to potential cumulative impacts.

Cumulative development has potential to conflict with biological resource plans and policies. However, individual cumulative projects would be required to implement mitigation measures, similar to the proposed project, if it is determined that significant impacts involving conflict with biological resource plans and policies for individual cumulative projects would occur. The proposed project's potential inconsistencies with policies designed to protect ESHA and the SPA buffer associated with El Encanto Creek would be resolved with implementation of mitigation measures and would not result in a significant environmental impact; furthermore, no cumulative development projects are located along El Encanto Creek. Therefore, cumulative development would have a less than significant cumulative impact involving conflict with biological resource plans and policies.

There would be no cumulative impact regarding conflict with adopted Habitat Conservation Plans or Natural Community Conservation Plans, as no such plans are implemented within the geographic scope of cumulative impacts to biological resources.

4.4 Cultural Resources

This section analyzes the project's potential impacts related to cultural resources, including historic-age buildings (e.g., built environment), archaeological resources, and human remains.

This analysis is based on the *Phase 1 Cultural Resources Investigation* (Rasmussen 1999), *Extended Phase 1 Archaeological Investigation* (Dudek 2011), *Updated Historical Resources Evaluation* (Long 2025), and *Cultural Resources Inventory Memorandum* (Langan 2025). These archaeological and historic reports contain confidential information exempt from disclosure under the California Public Records Act and are available to qualified professionals upon request.

4.4.1 Setting

4.4.1.1 Prehistoric Setting

The project lies in the Central Coast archaeological region (Jones et al. 2007; Glassow et al. 2007) which has been defined as extending from south of San Francisco Bay to the northern edge of the California Bight (Jones et al. 2007:125). Following Jones et al. (2007:137), the precontact cultural chronology for the Central Coast can be generally divided into six periods: Paleo-Indian (ca. 10000–8000 before common era [BCE]), Millingstone/Early Archaic (8000-3500 BCE), Early (3500-600 BCE), Middle (600 BCE- 1000 common era [CE]), Middle-Late Transition (1000-1250 CE), and Late (1250 CE-contact [ca. 1769 CE]).

Paleo-Indian Period (ca. 10,000 – 8000 BCE)

When Wallace developed the Early Man horizon (referred to herein as the Paleo-Indian period) in the 1950s, little evidence of human presence along the California coast prior to 6000 BCE existed (Wallace 1955). Archaeological work in the intervening years has identified numerous sites older than this date, and it is likely that more Paleo-Indian coastal sites are presently under water as it is estimated that 10,000 years ago sea levels were 15-20 meters lower than sea levels are today (Bickel 1978:7; McLaren et al. 2019).

Typically, artifact assemblages from the Paleo-Indian period lack groundstone implements and an abundance of faunal remains. Flaked stone tools are common in this period, such as the eccentric crescent which is thus far exclusive to the Paleo-Indian period (Cartier 1989). Furthermore, this period shows use of large side-notched points of the Central Coast Stemmed series which date to as early as 8,000 years ago (Justice 2002). Additionally, a fluted point was reportedly found on the surface in Nipomo, San Luis Obispo County (Mills et al. 2005; Jones et al. 2007).

Millingstone/Early Archaic Period (8000 – 3500 BCE)

The Millingstone period, as defined by Wallace (1955, 1978), is characterized by an ecological adaptation to collecting suggested by the appearance and abundance of well-made milling implements. Millingstones occur in large numbers for the first time in the region's archaeological record and are even more numerous near the end of this period. Aside from millingstones, typical artifacts during this period include crude core and cobble-core tools, flake tools, large side-notched projectile points, and pitted stones (Jones et al. 2007).

The Millingstone period within the Central Coast corresponds with King's (1990) Early period of the Santa Barbara Channel area, although King's Early period starts later and lasts longer (5,500 – 1,350 BCE).

No less than 42 sites dating to this period have been identified in various settings, including rocky coasts, estuaries, and nearshore interior valleys (Jones et al. 2007). The larger sites usually contain extensive midden deposits, possible subterranean house pits, and cemeteries. Most of these sites probably reflect intermittent use over many years of local cultural habitation and resource exploitation, with an emphasis on marine resources. Evidence at Elkhorn Slough confirms an early preference for estuarine and lacustrine settings. A lack of shell beads and flaked obsidian tools suggests low intensity inter-regional exchange (Jones and Jones 1992).

Early Period (3500 – 600 BCE)

An extensive series of shoreline midden deposits within the Central Coast region date to the Early period, suggesting increase in tribal settlement on the open coast (Jones and Waugh 1995, 1997; Jones et al. 2003). Sites dating to this period are marked by large lithic artifact assemblages consisting of Central Coast Stemmed Series and side-notched projectile points. This trend, first identified by Rogers (1929), has since become apparent at numerous sites throughout the Central Coast. In many cases, manifestations of this trend are associated with the establishment of new settlements (Jones et al. 2007).

The material culture recovered from Early period sites within the Central Coast region provides evidence for continued use of inland plant and coastal marine resources. Artifacts include milling slabs and handstones, as well as mortars and pestles, which were used for processing a variety of plant resources. Bipointed bone gorge hooks were used for fishing. Assemblages also include a suite of Olivella beads, bone tools, and pendants made from talc schist. Square abalone shell (Haliotis spp.) beads have been found in Monterey Bay, but not in the Big Sur or San Luis Obispo areas (Jones and Waugh 1997:122).

Shell beads and obsidian are hallmarks of the trade and exchange networks of the central and southern California coasts. The archaeological record indicates a substantial increase in the abundance of obsidian at Early period sites in the Monterey Bay and San Luis Obispo areas (Jones and Waugh 1997:124–126). Obsidian trade continued to increase during the following the Middle period.

The Early Period shows an increase in hunting and fishing over the Millingstone Period with rabbits and fish remains present in greater concentrations (Jones et al. 2007).

Middle Period (600 BCE – 1000 CE)

The Middle Period saw a population increase as a number of new settlements spanned throughout the Central Coast. During this period, evidence from archaeological sites shows burials in a flexed position and associated burial items, including projectile points and bone gorges. Olivella shell beads are found in abundance associated with burials dating to the Middle Period (Hildebrandt 1997; Jones et al. 2007).

The Middle-Period is generally characterized by a shift in subsistence patterns, including more abundant use of mortars and pestles as well as higher use of larger stemmed and notched projectile points. Additionally, the first appearance of circular shell and bone fishhooks and notched net sinkers were observed within sites dating to this period. Evidence shows that marine resources were still abundantly utilized, with an increase in pinniped faunal remains, such as fur seals (Jones and Ferneau 2002; Boone 2012). Faunal assemblages show that marine diets were supplemented with small mammals, such as rabbits (Jones et al. 2007). Additionally, evidence from macro botanical analysis indicates a shift from small seeds to a heavy reliance on acorns (Wohlgemuth 1996; Hildebrandt 1997).

Middle-Late Transition Period (1000 – 1250 CE)

The Middle-Late Transition period is marked by relative instability and change, with major changes in diet, settlement patterns, and interregional exchange. The relatively ubiquitous Middle period shell midden sites found along the Central Coast were abandoned by the end of the Middle-Late Transition period; therefore, most Transition period and Late period sites were first occupied at this time (Jones and Ferneau 2002:213, 219). Instead of large year-round habitation patterns, Middle-Late and Late period sites show smaller seasonal settlements (Boone 2012).

During the Middle-Late Transition period within the Central Coast region, projectile points diagnostic of both the Middle and Late periods are found (Jones and Ferneau 2002:217). The points include large, contracting-stemmed types typical of the Middle period, as well as Late period small, leaf-shaped points, which likely reflect the introduction of the bow and arrow.

Late Period (1250 CE – Historic Contact)

Late period sites are marked by small, finely worked projectile points, such as Desert side-notched and Cottonwood points, as well as temporally diagnostic shell beads. Although shell beads were typical of coastal sites, trade brought many of these maritime artifacts to inland locations, especially during the latter part of the Late period (Jones et al. 2007).

Common artifacts identified at Late Period sites include bifacial bead drills, bedrock mortars, hopper mortars, lipped and cupped Olivella shell beads, and steatite disk beads. The presence of beads and bead drills suggest that low-level bead production was widespread throughout the Central Coast region (Jones et al. 2007).

Unlike the large Middle period shell middens, Late period sites are more frequently single-component deposits. There are also more inland sites, with fewer and less visible sites along the Pacific shore during the Late period. An increase in sites with bedrock mortars during the Late period further suggests that nuts and seeds began to take on a more significant dietary role (Jones et al. 2007).

4.4.1.2 Historic Setting

The historic setting is based upon the information provided within the *Extended Phase 1 Archaeological Investigation* (Dudek 2011). The historic occupation of the project vicinity can be divided into four settlement periods: the Mission Period (1769–1830 A.D.), the Rancho Period (ca. 1830–1850 A.D.), the American Period (ca. 1850–1900 A.D.), and the Modern Period (1900 to the present). Construction of Mission Santa Barbara in 1786, Mission la Purisima Concepción in 1787, and Mission Santa Ynez in 1804 altered both the physical and cultural landscape of the region. The missions were the center of Spanish influence in the region and affected Native American patterns of settlement, culture, trade, industry, and agriculture. Native Americans provided labor for the Mission system, and many coastal tribes, such as the Chumash, were no longer able to live in their traditional ways.

Mexico rebelled against Spain in 1810, and by 1821, Mexico, including California, achieved independence. The Mexican Republic began to grant private land to citizens to encourage immigration to California. Huge land grant ranchos took up large sections of land in California. In 1833, Mexico declared an end to the Missions and secularized each Mission's land holdings.

Secularization of lands and a focus on cattle raising marked the Rancho Period, where large land grants of mission lands were ceded to wealthy, prominent Spanish families. Native Americans continued to work as laborers on ranchos during this period.

The American Period began with the acquisition of California by the United States in 1848, at the end of the Mexican-American War. The Mexican-American war began in 1846, with the short-lived California Republic being declared on June 14, 1846. The Republic disbanded 26 days later upon the arrival of U.S. troops in California. The American Period is marked by the large influx of American citizens into California and the almost complete replacement of previous Native American, Spanish, and Mexican cultural systems with United States customs and laws.

The discovery of gold and the subsequent Gold Rush brought many Americans into California, which promoted extensive cultural changes. The state developed rapidly, being admitted to statehood in 1850. However, this great influx of population was primarily limited to central California, in San Francisco and the Gold Rush region of the Sierra Nevada. Southern California grew very slowly during this time. After the end of the Gold Rush, farming and more intensive land uses steadily replaced cattle raising. In the 1860s, cattle ranching was substantially reduced by a prolonged drought, and a more mixed agricultural economy developed in Santa Barbara County and other rural areas of Southern California.

Major forces of regional change between 1900 and 1920 begin the Modern Period, which extends to the present day, during which Southern California developed its distinctive regional characteristics. These include the growth of Los Angeles into a major city, increased urbanization in Santa Barbara County and along the coast, development of the automobile as the main form of transportation, and development in the region of agribusiness, wineries, the oil industry, and large college institutions.

4.4.1.3 Project Site

The project site is within the Goleta Foothills at the edge of the Santa Ynez Mountains, and adjacent to El Encanto Creek. The project site encompasses a small recorded archaeological site, CA-SBA-1735.

Previous Archaeological Investigations

Following is a summary of the prior archaeological investigations performed within the larger CA-SBA-1735 site.

In June 2025, a California Historical Resources Information Systems records search was conducted at the Central Coast Information Center, at the Santa Barbara Museum of Natural History to identify previously recorded cultural resource within one-mile of the project site. The records search identified a total of 14 previous cultural resource studies within a 0.5-mile radius of the project site and 24 recorded resources, most of which are isolated finds. Two previously recorded resources intersect the project site, a pre-contact site P-42-001735 (CA-SBA-1735) along the southwestern boundary and a pre-contact isolate P-42-038283 along the southeastern boundary. Isolates are single artifacts, or a small group of artifacts not considered, at the time of discovery, to be clearly associated with another archaeological resource. Isolates are not considered eligible for the California Register of Historical Resources (CRHR) as an archaeological resource.

CA-SBA-1735 was recorded in 1972 and described as a “trace scattering of chipping waste, clam shell and sandstone cobble fragments.” Artifacts were described as “a few utilized Franciscan chert flakes of thumbnail size.” The site was described as being 27 by 18 meters (88.5 by 59 feet), and was noted to be in an area “cultivated, eroded, and disturbed by tree roots,” with a creek adjacent to the project site’s western boundary. The site was not mapped in detail when it was recorded, and the location mapped by the Information Center on the United States Geological Survey topographic Dos Pueblos Canyon quadrangle map is an estimated location. A site survey completed in 1999 made efforts to locate CA-SBA-1735, but no evidence of the site was found in its mapped location.

The mapped site location was tested with three shovel probes in 2011. The Chumash Native American community, represented by Gilbert Unzueta, Chumash elder, monitored this excavation. No prehistoric cultural materials were recovered. A survey of the mapped site location and vicinity was conducted by on June 19, 2013. No cultural materials were observed. Testing has not identified any archaeological deposits within the mapped CA-SBA-1735 location on the project site, and accumulated evidence indicates the pre-contact site was likely disturbed or destroyed by past orchard removal, driveway construction, and related grading.

Historic Resources

Three buildings are present on the project site: a residence, barn, and stable. These are typical 1950s-era vernacular ranch buildings. These buildings were moved onto the project site in the 1990s from the southern portion of the original 25-acre parcel when Cathedral Oaks Road was extended and a subdivision was built south of the road. The *Updated Historical Resources Evaluation* for the project involved a CRHR evaluation and included an eligibility evaluation of historic resources under the City of Goleta historic preservation ordinance. The California Department of Parks and Recreation 523 Series forms were also prepared. Based on the results of these evaluations, the three buildings do not meet eligibility for listing as historical resources in the CRHR or as City landmarks (Long 2025). The criteria used to determine eligibility for listing in the CRHR and as a City landmark are detailed in Section 4.4.2, *Regulatory Setting*, below:

- Under CRHR Criterion 1, the buildings onsite were determined to not be eligible for listing because they are not associated with an important trend.
- Under CRHR Criterion 2, the buildings onsite were determined to not be eligible for listing because none of the property owners were determined to have made specific contributions to local, state, or national history.
- Under CRHR Criterion 3, the buildings onsite were determined to not be eligible for listing because they do not embody the distinctive characteristics of the type, period, or method of construction, represent the work of a master, possess high artistic value, nor are a component of a historic district.
- Under CRHR Criterion 4, the buildings onsite were determined to not be eligible for listing because further study of the buildings would not add any new information to the historic record as the building style and historical information thereabout is common.

Using the City's criteria for listing as a City landmark, the buildings onsite were determined to be not eligible for the following reasons:

- The buildings are not associated with important events or broad patterns of development that have made historically significant contributions at the City, State, or national level;
- The buildings are not associated with people significant to local, state, or national history;
- The buildings do not embody distinctive characteristics of a style, type, period, or method of construction, or are examples of the use of indigenous materials or craftsmanship, or a historically significant example of the work of a notable builder, designer, or architect;
- The buildings do not have the potential to yield information important to history; and,
- The buildings do not have integrity because no historic significance was identified.

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 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" (Code of Federal Regulations [CFR] 36 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

At the state level, the most relevant laws and regulations regarding the protection of cultural resources are Public Resources Code (PRC) §§ 5020.1(k) and 5024.1(g) (CEQA) and 14 CCR § 4852 (*CEQA Guidelines*). Consideration of the significance of an "important archaeological resource" is regulated by CEQA Guidelines §§ 15064.5 and 15126.4 and the draft criteria regarding resource eligibility to the CRHR. Generally, under CEQA, a historic resource includes the built-environment, historic, and prehistoric archaeological resources, which are considered significant and listed on or eligible for listing on the CRHR if the resource meets the following criteria:

1. The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. The resource is associated with lives of persons important in our past.
3. The resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. The resource has yielded, or may be likely to yield, information important in prehistory or history.

Impacts on "unique archaeological resources" and "unique paleontological resources" are also considered under CEQA, as described under PRC § 21083.2. A unique archaeological resource implies 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 one of the following criteria:

1. The archaeological artifact, object, or site contains information needed to answer important scientific questions, and there is a demonstrable public interest in that information.
2. The archaeological artifact, object, or site has a special and particular quality, such as being the oldest of its type or the best available example of its type.
3. The archaeological artifact, object, or site is directly associated with a scientifically recognized important prehistoric event or person.

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 §§ 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 §§ 15064.5 and 15126.4 and to the eligibility criteria as an "important" or "unique archaeological resource."

A nonunique archaeological resource is an archaeological artifact, object, or site that does not meet the above criteria. Impacts to nonunique archaeological resources and resources that do not qualify for listing on the CRHR receive no further consideration under CEQA. Similarly, a nonunique paleontological resource is given no further consideration other than the simple recording of its existence by the CEQA lead agency.

Section 15064.5(b)(3) of the CEQA Guidelines state that if significant cultural resources are identified within a 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 Section 15126.4[b][3]).

California Register of Historical Resources

CEQA (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 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]). 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]).

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 Native American Heritage Commission (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

City of Goleta's General Plan/Coastal Land Use Plan

The City of Goleta's General Plan/Coastal Land Use Plan Open Space Element (2006) outlines several policies related to the preservation of historic and cultural resources:

- **OS 8.1: Definition**. Cultural resources include Native American archaeological sites and areas of the natural landscape that have traditional cultural significance. Archaeological sites include prehistoric sites that represent the material remains of Native American societies and their activities and ethnohistoric sites that are Native American settlements occupied after the arrival of European settlers in California. Such archaeological sites may include villages, seasonal campsites, burial sites, stone tool quarry sites, hunting sites, traditional trails, and sites with rock carvings or paintings. Areas of traditional cultural significance include Native American sacred areas where religious ceremonies are practiced or which are central to their origins as a people, as well as areas traditionally used to gather plants for food, medicinal, or economic purposes.
- **OS 8.3: Preservation**. The City shall protect and preserve cultural resources from destruction. The preferred method for preserving a recorded archeological site shall be by preservation in place to maintain the relationship between the artifacts and the archaeological context. Preservation in place may be accomplished by deed restriction as a permanent conservation easement, avoidance through site planning and design, or incorporation of sites into other open spaces to prevent any future development or use that might otherwise adversely impact these resources.
- **OS 8.4: Evaluation of Significance**. For any development proposal identified as being located in an area of archaeological sensitivity, a Phase I cultural resources inventory shall be conducted by a professional archaeologist or other qualified expert. All sites determined through a Phase 1 investigation to potentially include cultural resources must undergo subsurface investigation to determine the extent, integrity, and significance of the site. Where Native American artifacts have been found or where oral traditions indicate the site was used by Native Americans in the past, research shall be conducted to determine the extent of the archaeological significance of the site.
- **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.

- **OS 8.6: Monitoring and Discovery**. On-site monitoring by a qualified archaeologist and appropriate Native American observer shall be required for all grading, excavation, and site preparation that involves earth moving operations on sites identified as archaeologically sensitive. If cultural resources of potential importance are uncovered during construction, the following shall occur:
  - The grading or excavation shall cease and the City shall be notified.
  - A qualified archeologist shall prepare a report assessing the significance of the find and provide recommendations regarding appropriate disposition.
  - Disposition will be determined by the City in conjunction with the affected Native American nation.

Goleta Historic Preservation and Archaeological and Tribal Cultural Ordinance

The Goleta Historic Preservation and Archaeological and Tribal Cultural Ordinance (Ordinance No. 22-05), passed in April 2022, establishes regulations and processes associated with historic and archaeological resources. This includes Chapter 17.43 (Archaeological and Tribal Cultural Resources), applicable provisions of which 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 17.33.040 Historic Landmarks

Criteria for Designating a Historic Landmark: A building, structure, object or site shall be designated a Historic Landmark if the City Council finds that the following criteria are met:

1. The proposed Historic Landmark is at least 50 years old or exhibits Exceptional Importance; and
2. The proposed Historic Landmark meets one or more of the following:

a. The proposed Historic Landmark is associated with important events or broad patterns of development that have made a significant contribution to the historical, archaeological, cultural, social, economic, aesthetic, engineering, or architectural development of the City, State, or nation; or

c. The proposed Historic Landmark is associated with persons significant in local, State, or national history; or

d. The proposed Historic Landmark embodies distinctive characteristics of a style, type, period, or method of construction, or is an example of the use of indigenous materials or craftsmanship, or it is a significant example of the work of a notable builder, designer, or architect; or

e. The proposed Historic Landmark has yielded or has the potential to yield, information important to the history or prehistory of the City, State, or nation; and

3. The proposed Historic Landmark retains those aspects of historic integrity that convey the reason for its significance.

Chapter 17.33.080 Design Review of Alterations to Historic Resources

This section establishes the review process for proposed alterations to historic resources.

A. **Compliance with Section.** It shall be unlawful for any person, property owner, or entity to alter any historic resource directly or indirectly except as provided herein. Alterations to historic resources to add an attached accessory dwelling unit are subject to the requirements of Section 17.41.030(F)(8) only.

B. **Alterations that are Exempt from Design Review**. The provisions for the Design Review of proposed alterations to historic resources shall not be construed to prevent ordinary maintenance and repair which does not change the design, materials, architectural features, or character-defining features of a historic resource. The exemptions outlined in Section 17.58.020 apply to historic resources, with the following exceptions:

1. The proposed alteration will affect an identified character-defining feature of the historic resource.
2. All proposed additions to historic resources are subject to Design Review.

C. **Criteria and Procedure for Director Review of Alterations.**

1. Required Findings. The Director shall approve the plans and Design Review Board review is not required if the following findings are made:

a. The proposed alteration is minor and clearly meets any applicable design guidelines adopted by the City Council; or

b. In the absence of applicable design guidelines, the proposed alteration is minor and clearly meets the relevant Secretary of the Interior's Standards for the Treatment of Historic Properties; and

c. The proposed alteration will not diminish, eliminate, or adversely affect the character, character-defining features, or historic integrity of the historic resource; and

d. Any changes to the proposed alteration requested by the Director are agreed to by the applicant.

2. Changes to the Plans. No changes shall be made to the project once the Director has approved the plans without resubmitting to the Director for approval of the changes.

D. **Criteria and Procedure for Historic Preservation Commission and Design Review Board Review of Alterations.**

1. Historic Preservation Commission Review. The review and decision on the design review for projects involving historic resources will be undertaken by the Design Review Board as outlined in Section 17.58.060, with a recommendation from the Historic Preservation Commission. The Historic Preservation Commission will review the application materials and make a recommendation to the Design Review Board for consideration prior to Preliminary Review as outlined in Section 17.58.060(B).
2. Required Findings. The Historic Preservation Commission shall make recommendations, and the Design Review Board shall decide based on one of the following findings:
   a. The proposed alteration is found to be consistent with any applicable design standards or guidelines adopted by the City Council; or
   b. In the absence of applicable design standards or guidelines, the proposed alteration is found to be consistent with the relevant Secretary of the Interior's Standards for the Treatment of Historic Properties; or
   c. There is sufficient evidence, including evidence provided by the applicant, that denial of the proposed alteration would cause an immediate hardship because of conditions unique to the specific property.

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

4.4.3.1 Methodology and Significance Thresholds

Methodology

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 integrity (e.g., does the resource contain data potential and are those resources intact and able to convey their significance based on their existing condition). The analysis pertaining to the historic built environment resources is based upon the results of the *Updated Historical Resources Evaluation* (Long 2025). The analysis pertaining to archaeological resources and human remains is based upon the results of the *Phase 1 Cultural Resources Investigation* (Rasmussen 1999), *Extended Phase 1 Archaeological Investigation* (Dudek 2011), and *Cultural Resources Inventory Memorandum* (Langan 2025). The analyses presented in these reports included site visits, pedestrian surveys, records searches, and on-site testing to evaluate the potential presence of cultural resources.

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA* Guidelines which provides the following to determine if a project would have a potentially significant impact on cultural resources. Would the project:

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; or
3. Disturb any human remains, including those interred outside of formal cemeteries.

According to the County's 2024 *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.

4.4.3.2 Project Impacts and Mitigation Measures

Threshold 1:	Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?

Impact CUL-1 THE PROJECT SITE DOES NOT CONTAIN ANY HISTORIC RESOURCES; THEREFORE, THE PROJECT WOULD NOT CREATE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A HISTORICAL RESOURCE. NO IMPACT WOULD OCCUR.

There are three structures on the project site: a residence, barn, and stable. The *Updated Historical Resources Evaluation* for the project involved a CRHR evaluation and included an eligibility evaluation of historic resources under the City of Goleta historic preservation ordinance. The California Department of Parks and Recreation 523 Series forms were also prepared. Based on the results of these evaluations using the CRHR and City criteria discussed in the Historic Resources Setting above, the three buildings do not meet eligibility for listing as historical resources in the CRHR or as City landmarks (Long 2025). Therefore, no historical resources are located on-site. The proposed project would not create a substantial adverse change in the significance of a historical resource, and no impact would occur.

Mitigation Measures

No mitigation is required.

Threshold 2:	Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?

Impact CUL-2 PROJECT CONSTRUCTION WOULD INVOLVE GROUND DISTURBING ACTIVITIES SUCH AS GRADING AND EXCAVATION, WHICH COULD POTENTIALLY RESULT IN DISTURBANCE OF UNANTICIPATED ARCHAEOLOGICAL RESOURCES. WITH IMPLEMENTATION OF MITIGATION MEASURES CUL-1 THROUGH CUL-3, THIS IMPACT WOULD BE REDUCED TO CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.*

No prehistoric archaeological materials were recovered during the excavation of three shovel probes within the mapped CA-SBA-1735 boundary. The results of the previous Phase 1 survey of the project site, the supplemental survey of the northern third of the project site with systematic shovel scrapes, and the three shovel probes, revealed no archaeological resources located within the project site (Dudek 2011).

Project-related ground disturbance would occur throughout the 14.38-acre site during demolition of existing structures, grading for 56 new residential lots, and installation of utilities and other infrastructure. Grading would involve approximately 27,500 cubic yards of cut and 23,500 cubic yards of fill. Excavation for utilities and stormwater facilities would extend several feet below the current ground surface, including installation of two 18-inch storm drains, an underground detention system, and a detention basin in the western portion of the site. Portions of the proposed project would also encroach into the 100-foot Streamside Protection Area buffer along El Encanto Creek, where native soils are most likely to remain intact.

Although the project site has been subject to previous disturbance from orchard removal and residential development, the proposed depths and area of excavation for utilities, stormwater systems, and grading would likely extend into previously undisturbed native soils. While there are no known archaeological resources present on the project site, the potential remains for unknown resources to be present. Should currently unknown archaeological resources be present onsite, they are most likely to occur in the intact and undisturbed soil rather than in previously disturbed fill. The combination of the proposed ground disturbance and the project site's location in a culturally sensitive area increases the potential for encountering unknown archaeological materials.

While prior testing and surveys revealed no archaeological deposits, the possibility of unanticipated discoveries cannot be ruled out. If such materials qualify as unique archaeological resources under CEQA, their disturbance would constitute a substantial adverse change in significance. Therefore, impacts to archaeological resources would be potentially significant.

Mitigation Measures

CUL-1 Archaeological Monitoring

Prior to ground disturbance activities, the project applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards (qualified archaeologist) and has experience in California prehistoric and historic resources (experience within City of Goleta or Santa Barbara County preferred). The project applicant shall provide proof of retainment of the qualified archaeologist to the City of Goleta's Planning and Environmental Review Director, or designee, prior to the issuance of Zoning Clearance for the grading permit. The qualified archaeologist shall prepare a Cultural Resource Monitoring and Inadvertent Discovery Plan, conduct archaeological monitoring, and address any inadvertent discoveries identified during project implementation (refer to Mitigation Measure CUL-4). The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the Plan prior to the issuance of Zoning Clearance for the grading permit. The

Plan shall outline archaeological and Native American resource monitoring protocols, as well as a program for treatment and mitigation in the case of an inadvertent discovery of cultural resources during project-related ground-disturbance. The Plan shall also provide for the proper identification, evaluation, treatment, and protection of any cultural resources in accordance with CEQA throughout the duration of the project. The Plan shall be incorporated and referenced in all grading and construction plans intended for use by the construction contractor(s).

The qualified archaeologist shall manage archaeological monitoring during initial ground disturbance activities, defined as construction-related earth moving of sediments from their place of deposition. This definition excludes movement of sediments after they have been initially disturbed or displaced by project-related construction. The qualified archaeologist shall oversee and establish monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The qualified archaeologist shall ensure all daily monitoring logs are maintained. The requirement for archaeological monitoring shall be noted on all demolition and grading plans. The qualified archaeologist shall prepare an archaeological monitoring report within 60 days following completion of ground disturbance, and shall submit the archaeological monitoring report to the City of Goleta's Planning and Environmental Review Director, or designee, for review. The archaeological monitoring report shall document compliance with approved cultural resource mitigation measures, include all monitoring efforts, and include an appendix with the daily monitoring logs. The qualified archaeological shall submit the final archaeological monitoring report to the City of Goleta's Planning and Environmental Review Director and the Central Coast Information Center.

Plan Requirements and Timing. Prior to ground disturbance, the project applicant shall retain a qualified archaeologist. The qualified archaeologist shall create a Plan, conduct monitoring, and address any discoveries during project construction. Proof of retainment shall be provided to the City of Goleta's Planning and Environmental Review Director prior to the issuance of Zoning Clearance for the grading permit. The Plan shall outline monitoring protocols and treatment for any discovered cultural resources, ensuring compliance with CEQA. The Plan shall be referenced in all grading and construction plans. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the Plan prior to the issuance of Zoning Clearance for the grading permit.

Monitoring. The qualified archaeologist shall manage monitoring during initial ground disturbance, adjusting efforts (decrease, increase, or terminate) based on the potential to encounter cultural deposits. Daily monitoring logs shall be maintained. The qualified archaeologist shall prepare an archaeological monitoring report, documenting compliance and monitoring efforts, and shall submit the archaeological monitoring report to the City of Goleta's Planning and Environmental Review Director, or designee, for review, within 60 days following completion of ground disturbance. The qualified archaeological shall submit the final archaeological monitoring report to the City of Goleta's Planning and Environmental Review Director and the Central Coast Information Center.

CUL-2 Worker Environmental Awareness Program Training

All construction personnel and monitors who are not trained archaeologists shall be briefed regarding unanticipated discoveries of archaeological resources prior to the start of construction activities as part of a Worker Environmental Awareness Program (WEAP) training. A basic presentation shall be prepared and presented by the qualified archaeologist, or their designee, to inform all construction personnel working on the project about the archaeological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction and explain the importance of and legal basis for the protection of

significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event archaeological resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the qualified archaeologist and if appropriate, Native American representative. If new construction personnel are added to the project, the crew foreman shall ensure the new personnel receive the WEAP training before starting work. The necessity of training attendance shall be stated on all demolition, grading, or construction plans and the project applicant shall maintain records demonstrating construction worker WEAP participation. The project applicant shall submit the records of construction worker WEAP participation to the City of Goleta's Planning and Environmental Review Director prior to construction activities and as needed after the addition of new personnel.

Plan Requirements and Timing. This measure shall be incorporated into the grading, demolition, and construction plans and the WEAP shall be available on-site during construction.

Monitoring. Records of construction worker WEAP participation shall be kept on file with the City of Goleta's Planning and Environmental Review Director for the duration of construction.

CUL-3 Unanticipated Discovery of Cultural Resources

If unanticipated cultural resources are discovered during project-related ground disturbance, the following procedures shall be implemented:

- The construction contractor(s) shall halt work within 50 feet of the find and notify the qualified archaeologist. Temporary fencing must be erected (e.g., orange temporary fence) to prevent damage to the resource along the 50-foot buffer. The qualified archaeologist retained pursuant to Mitigation Measure CUL-2 shall immediately evaluate the resource.
- If the resource is determined to be potentially significant, then the qualified archaeologist, project applicant, Native American monitor (if resources are Native American in origin), and City of Goleta's Planning and Environmental Review Director, or designee, shall meet to discuss the significance of the find. At the meeting, a decision shall be made, with the concurrence by the City of Goleta's Planning and Environmental Review Director, or designee, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resource.
- Treatment and avoidance of the newly discovered resource(s) shall be consistent with the Plan prepared pursuant to Mitigation Measure CUL-2. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils, and/or re-burial within the immediate vicinity so they are not subject to further disturbance in perpetuity. If avoidance is infeasible, then treatment shall be implemented pursuant to the Plan. The City of Goleta's Planning and Environmental Review Director, or designee, shall make the final determination based on the provisions of CEQA with respect to archaeological resources and recommendations of the qualified archaeologist.
- Further ground disturbance, including but not limited to grading and trenching, shall not resume within the area of the discovery until the City of Goleta's Planning and Environmental Review Director, or designee, has determined the appropriate mitigation has been implemented pursuant to the Plan and the qualified archaeologist has notified the construction contractor(s) to resume work. Work shall be allowed to continue outside of the 50-foot buffer area and shall be monitored by additional archaeological monitors, if necessary.
- If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, the qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, pursuant to the requirements

of the *CEQA Guidelines* Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the treatment plan and archaeological testing as appropriate. The qualified archaeologist shall submit the resulting documentation to the regional repository of the California Historical Resources Information System pursuant to *CEQA Guidelines* Section 15126.4(b)(3)(C).

- The qualified archaeologist shall provide evidence of compliance with this mitigation measure, if a significant archaeological resource is found, to the City of Goleta's Planning and Environmental Review Director and the appropriate California Historical Resources Information System Information Center upon completion of the data recovery plan detailing the significance of the resource and treatment findings.

Plan Requirements and Timing. If unanticipated cultural resources are discovered during ground disturbance, the construction contractor(s) shall halt work within 50 feet of the find and contact the qualified archaeologist. The qualified archaeologist shall evaluate the resource immediately. If the resource is potentially significant, the qualified archaeologist, project applicant, Native American monitor (if applicable), and City of Goleta's Planning and Environmental Review Director, or designee, shall meet to decide on appropriate mitigation. Treatment and avoidance shall follow the Plan from Mitigation Measure CUL-2. The City of Goleta's Planning and Environmental Review Director, or designee, shall make the final determination based on CEQA provisions. Ground disturbance shall not resume in the area until the City of Goleta's Planning and Environmental Review Director, or designee, has verified that mitigation is implemented. Work outside the 50-foot buffer shall continue with additional monitoring if necessary.

Monitoring. The City of Goleta's Planning and Environmental Review Director, or designee, shall review and approve the data recovery plan (if applicable). The qualified archaeologist shall submit documentation to the California Historical Resources Information System. The qualified archaeologist shall provide evidence of compliance to the City of Goleta's Planning and Environmental Review Director and the California Historical Resources Information System upon completion.

Significance After Mitigation

Mitigation Measures CUL-1 through CUL-3 would minimize potential impacts to unanticipated discoveries of archaeological resources by requiring archaeological monitoring, a cultural resources sensitivity training for construction personnel, and implementation of appropriate procedures for evaluation and treatment of any discoveries made during construction. Therefore, implementation of Mitigation Measures CUL-1 through CUL-3 would reduce potential impacts to archaeological resources to a less than significant level.

Threshold 3: Disturb any human remains, including those interred outside of formal cemeteries?

Impact CUL-3 PROJECT CONSTRUCTION WOULD INVOLVE GROUND DISTURBING ACTIVITIES, WHICH HAVE THE POTENTIAL TO UNEARTH OR ADVERSELY IMPACT PREVIOUSLY UNIDENTIFIED HUMAN REMAINS. WITH ADHERENCE TO EXISTING REGULATORY REQUIREMENTS, THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT.*

The *Phase I Cultural Resources Investigation* (Rasmussen 1999) and *Extended Phase I Archaeological Investigation* (Dudek 2011) for the proposed project did not identify human remains or prehistoric

villages where human remains and/or cemeteries are known to exist within the project site. However, the potential cannot be ruled out that human remains could be discovered during ground disturbing activities. 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 5097.98, impacts to human remains would be less than significant.

Mitigation Measures

No mitigation is required.

4.4.4 Cumulative Impacts

The geographic scope for cumulative impacts related to cultural resources is the City of Goleta. This scope is appropriate because the entirety of Goleta is considered sensitive for cultural resources due to the city's historic occupation. Past, present, and reasonably foreseeable future projects within this cumulative geographic scope include those listed in Table 3-1 in Chapter 3, *Related Projects*.

The proposed project would result in no impact to built environment (historic) resources. As such, it would not contribute to cumulative impacts on such resources. Therefore, cumulative impacts related to built environment resources are not addressed further in this analysis.

Cumulative projects would have the potential to adversely impact buried archaeological resources through ground-disturbing construction activities. 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 the proposed 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. Nevertheless, there is potential for cumulative development to uncover archaeological resources in the City of Goleta given the breadth of cumulative development and the area's sensitivity for archaeological resources. Cumulative impacts to archaeological resources would therefore be potentially significant. The proposed project would be required to implement Mitigation Measures CUL-1 through CUL-3, which require archaeological monitoring during ground-disturbing activities, a preconstruction cultural resources training for construction personnel, and implementation of appropriate procedures for the evaluation and treatment of any cultural resources that may be encountered, consistent with *CEQA Guidelines* Section 15064.5 and PRC Section 21083.2. With implementation of Mitigation Measures CUL-1 through CUL-3, the proposed project's contribution to cumulative impacts to archaeological resources would not be considerable.

Cumulative development would have the potential to adversely impact buried human remains through ground-disturbing construction activities. The magnitude of impacts for individual projects would depend upon the location, size of development, and depth of ground disturbance. State of California Health and Safety Code Section 7050.5 would apply to all future development, and compliance with this regulation would address impacts related to buried human remains associated with cumulative development. Therefore, cumulative development impacts involving the disturbance of human remains would be less than significant.

4.5 Geology and Soils

This section discusses the proposed project's potential impacts relating to geologic hazards and paleontological resources. This section is based, in part, on the *Preliminary Geotechnical Report* prepared by ENGEO (Appendix E).

4.5.1 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 2006a). 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. The valley generally slopes gently into the Goleta Slough, which is located in the south central portion of the valley.

Project Site

The project site encompasses approximately 15 acres within a semi-developed area of the City of Goleta in Santa Barbara County. The terrain slopes gently to moderately from the northeast toward the southwest, where El Encanto Creek forms a natural drainage feature along the site's boundary. A bioretention basin is located near the western edge of the property, and surface runoff generally flows toward these drainage features.

The site contains a mixture of natural and previously disturbed soils. Stiff clay and silt dominate the surface, with areas of weathered Rincon shale visible near the northern portion. In some locations, undocumented fill extends several feet below the surface. The land was historically used for agriculture, including avocado orchards, and remnants of this use are evident in the disturbed upper soil layers.

b. Seismic and Other Geologic Hazards

Seismic Hazards

Similar to much of California, the project site is located within a seismically active region. The project site is not located in an Alquist-Priolo Fault Zone.[1] No active faults are known to cross the property. The nearest mapped faults include the More Ranch Fault, Carneros Fault, and Glen Annie Fault. The following subsections summarize regional faults in proximity to the project site.

More Ranch Fault

The More Ranch Fault is part of a fault system mapped south of the project site near Highway 101. The More Ranch Fault is located approximately 1.2 miles southeast of the project site. This fault is not classified as active by the California Geological Survey or subject to an Alquist-Priolo Special Studies Zone; however, according to the Santa Barbara County Seismic Safety and Safety Element, the More Ranch Fault is considered active based on the existence of a geologically recent fault scarp. The fault is not considered a surface rupture hazard for the project site (Appendix E).

[1] An Alquist-Priolo Fault Zone are regulatory zones surrounding the surface traces of active faults in California. An active fault, for the purposes of the Alquist-Priolo Act, is one that has ruptured in the last 11,000 years.

San Luis Range Fault System

The San Luis Range Fault System is located approximately 1.5 miles from the project site. The San Luis Range Fault System capable of producing up to a magnitude 7.4 earthquake (Appendix E).

Oceanic-West Huasna Fault

The Oceanic-West Huasna Fault is located approximately 4.5 miles from the project site. The Oceanic-West Huasna Fault is capable of producing up to a magnitude 6.9 earthquake. (Appendix E).

Casmalia Fault

The Casmalia Fault is located approximately 8.5 miles from the project site. The Casmalia Fault is capable of producing up to a magnitude 7.5 earthquake (Appendix E).

Los Osos Fault

The Los Osos is located approximately 9.6 miles from the project site. The Los Osos Fault is capable of producing up to a magnitude 6.8 earthquake (Appendix E).

South Cuyama Fault

The South Cuyama Fault is located approximately 10.2 miles from the project site. The South Cuyama Fault is capable of producing up to a magnitude 7.0 earthquake (Appendix E).

San Andreas Fault

The San Andreas Fault is considered the most active fault in the region, and is located approximately 40 miles from the project site. Some segments of this fault are estimated to be capable of a magnitude 6.8 earthquake, but simultaneous rupture of more than one segment may cause a magnitude 8.0 earthquake, or greater (USGS 2025; Southern California Earthquake Data Center 2025).

Carneros Fault

The Carneros Fault is located approximately 2.7 miles from the project site (City of Goleta 2006a). The Carneros Fault is not classified as an active fault.

Glen Annie Fault

The Glen Annie Fault is located approximately 0.4-mile from the project site within the foothills north of Goleta (United States Geological Survey 2025). The Glen Annie Fault is not classified as an active fault.

Other Geologic Hazards

Other potential geologic hazards at the project site include ground rupture, ground shaking, landslides, liquefaction and lateral spreading, subsidence, collapse, and expansive soils, as described below. This information is based on the results of the *Preliminary Geotechnical Report* (Appendix E).

Surface Rupture

Seismically induced surface 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. No active faults are mapped across the project site and therefore surface rupture is not a potential concern on the project site.

Ground Shaking

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. The project site is within a seismically active region where strong ground shaking can occur during a major earthquake. Regional faults, including the More Ranch Fault and other nearby fault systems, are capable of producing significant seismic events that could affect the site. Seismic hazard mapping indicates that the site is subject to high levels of ground motion typical for the Goleta area.

Landslides

Landslides are the mass movement of rock, debris, or earth down a slope, usually in conjunction with earthquakes, floods, or prolonged precipitation. The northern portion of the project site is mapped within an area of high landslide potential. This area is underlain by the Rincon Formation, which is known for its susceptibility to slope instability. The site includes sloping terrain, particularly in the northern section, where landslide risk is greatest.

Liquefaction and Lateral Spreading

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 generally 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.

Subsurface exploration at the site encountered stiff to very hard clay and silt, and no groundwater was observed. These conditions indicate that the risk of liquefaction or lateral spreading on the project site is negligible.

Subsidence

Subsidence is the gradual settling or sudden sinking of the Earth's surface due to the removal or displacement of subsurface earth materials. The site is not located in an area identified as being at risk for regional subsidence or uplift. The topography and underlying geologic formations do not indicate conditions commonly associated with these hazards.

Collapse

Collapsible soils are relatively low density materials that shrink in volume when they become wet, and/or are subjected to great weight such as from a building or road fill. Collapsible soils are generally associated with loose, dry deposits that compress when wetted. The soils encountered at the site are stiff to very hard, and shallow bedrock is present in some areas. These conditions are not characteristic of collapsible soils.

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. The site contains clay-rich soils and weathered Rincon shale that exhibit high to critical expansion potential. Laboratory testing of site soils indicates high plasticity and expansion characteristics, which are typical of clayey soils in the region.

Paleontological Resources

Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). The paleontological sensitivity (the potential for a geologic unit to produce scientifically significant fossils) of the geologic units that underlie the project site were evaluated to assess the project's potential for scientifically important paleontological resources to occur within the project site.

In the absence of other sensitivity criteria required by certain federal, state, or local regulatory agencies, the paleontological sensitivity scale explained in the Society of Vertebrate Paleontology's (SVP) *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources* is generally used (SVP 2010). According to this system, geologic units can be assigned a high, low, undetermined, or no potential for containing scientifically significant nonrenewable paleontological resources.

The project's geotechnical report identified three geologic units underlying the project site: artificial fill, Pleistocene-aged alluvium, and Rincon Formation (Appendix E). Artificial fill represents sediment disturbed or placed by humans, and since it is removed from its original stratigraphic context, it is not considered paleontologically sensitive (SVP 2010). In some areas of the project site, the artificial fill is up to seven feet thick, and in other areas, it is as thin as two feet thick. Terrestrially derived (i.e., non-marine) Pleistocene-aged alluvium is known to contain significant vertebrate fossils in rare locations in southern Santa Barbara County (Jefferson 2010; University of California Museum of Paleontology 2025).The Rincon Formation is known to contain fossils, but non-significant invertebrates are most common with rarer examples of vertebrate fossils or significant invertebrates (i.e., representing rare species or exceptionally preserved communities). The entire project site has been used for agriculture, so it is assumed that the uppermost two feet to be disturbed and, therefore not paleontologically sensitive regardless of the mapped geologic unit (Appendix E). The paleontological sensitivity of the artificial fill and Pleistocene-aged alluvium is undetermined greater than two feet below the ground surface. The paleontological sensitivity of the Rincon Formation is high greater than two feet below ground surface.

A paleontological records search of the Santa Barbara Museum of Natural History was conducted on October 7, 2025, which did not identify known paleontological localities within the project site (Hoffman 2025). However, the Santa Barbara Museum of Natural History does contain paleontological localities from the same geologic units that occur within the project site. Localities from Pleistocene-aged occur as little as 0.5-mile from the project site, preserving taxa such as Pacific mastodon (*Mammut pacificus*), mammoth (*Mammuthus*), sea otter (*Enhydra*), and invertebrates. Localities from Rincon Formation include sea birds (*Phalacocorax*) and invertebrates (Hoffman 2025).

4.5.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The Clean Water Act prohibits discharge of pollutants, including substantial sedimentation, to waters of the United States from any point source unless it is in compliance with a National Pollutant Discharge Elimination System permit. Please refer to Section 4.8.2, subsection (a), in Section 4.8, *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 Building Code

California law provides a minimum standard for building design through the California Building Code (CBC) (California Code of Regulations 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 regulations (California Code of Regulations 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 Section 2621, et seq.; 14 California Code of Regulations Section 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 California Code of Regulations Section 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 California Code of Regulations Section 3603).

Seismic Hazards Mapping Act

The California Geological Survey, formerly the California Department of Conservation, Division of Mines and Geology, provides guidance with regard to seismic hazards. Under the 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, 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.

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 State Water Resources Control Board, 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 requires that developers of land where construction activities would occur over more than one acre implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMP) that would, in part, reduce erosion. Please refer to Section 4.8.2, subsection (b), in Section 4.8, *Hydrology and Water Quality*, for a detailed description of the Construction Stormwater General Permit and how it applies as a state regulation for the proposed project.

California Public Resources Code

Section 5097.5 of the California Public Resource Code states "no person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface" any "vertebrate paleontological site" on public lands without the "permission of the public agency having jurisdiction over such lands." Violation of this section is a misdemeanor.

As used in this section, "public lands" means lands owned by or under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with Public Resources Code Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

c. Local Regulations

Post-Construction Stormwater Management Requirements

The Central Coast Regional Water Quality Control Board 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 for development projects during operation. These requirements include those which are designed to minimize erosion during operation. Please refer to Section 4.8.2, subsection (c), in Section 4.8, *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.

City of Goleta General Plan/Coastal Land Use Plan

The Safety Element of the City of Goleta General Plan/Coastal Land Use Plan contains policies intended to reduce the potential for geologic hazards to adversely affect people and property. The Open Space Element of the City of Goleta General Plan/Coastal Land Use Plan contains a policy requiring the protection of paleontological resources. Applicable policies are provided below (City of Goleta 2006a, 2006b):

- **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.

- **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.
- **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.
- **SE 4.4: Setback from Faults.** New development shall not be located closer than 50 feet to any active or potentially active fault line to reduce potential damage from surface rupture. Nonstructural development may be allowed in such areas, depending on how such nonstructural development would withstand or respond to fault rupture or other seismic damage.
- **OS 8.7: Protection of Paleontological Resources.** Should substantial paleontological resources be encountered during construction activities, all work that could further disturb the find shall be stopped and the City of Goleta shall be notified within 24 hours. The applicant shall retain a qualified consultant to prepare a report to the City that evaluates the significance of the find and, if warranted, identifies recovery measures. Upon review and approval of the report by the City, construction may continue after implementation of any identified recovery measures.

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 a SWPPP, the City may accept the SWPPP if it contains the City's required elements of an erosion and sediment control plan. Please refer to Section 4.8.2, subsection (c), in Section 4.8, *Hydrology and Water Quality*, for a detailed description of City of Goleta Municipal Code requirements and how they apply as a local regulation for the proposed project.

4.5.3 Impact Analysis

4.5.3.1 Methodology and Significance Thresholds

Methodology

Assessment of impacts related to geologic hazards is based on a review of site information and conditions, and the *Preliminary Geotechnical Report* (Appendix E).

Impacts related to paleontological resources and unique geological features are based upon the geologic units underlying the project site. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units. In addition, Rincon requested a records search of the Santa Barbara Museum of Natural History on September 15, 2025, to identify any previously discovered paleontological

localities within the project site. The results of the records search conducted on October 7, 2025, are incorporated into this analysis.

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on geology and soils. Would the project:

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; or
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Pursuant to the County of Santa Barbara's 2024 *Environmental Thresholds and Guidelines Manual*, geology and soils impacts are classified as potentially significant 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 to assess geologic impacts.

4.5.3.2 Project Impacts and Mitigation Measures

Threshold 1(a): 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 THE PROJECT SITE DOES NOT OVERLIE AN ALQUIST-PRIOLO FAULT ZONE OR OTHER ACTIVE FAULT ZONES. NO IMPACT WOULD OCCUR.

As described in the Seismic Hazards discussion in Section 4.5.1, *Setting*, the project site is not located within an Alquist-Priolo Earthquake Fault Zone, and no active faults are mapped across the project site (California Geological Survey 2025; Appendix E). The nearest mapped fault is the More Ranch Fault, located approximately 1.2 miles southeast of the project site. As the project site does not overlie a known fault the proposed project would not directly or indirectly cause the risk of loss, injury, or death involving rupture of a known earthquake fault. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Threshold 1(b): 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 REGION AND MAY BE SUBJECT TO STRONG GROUND SHAKING DURING A MAJOR EARTHQUAKE. STRUCTURES WOULD BE DESIGNED IN ACCORDANCE WITH THE CALIFORNIA BUILDING CODE AND MITIGATION MEASURE GEO-1 WOULD REQUIRE INCORPORATION OF SEISMIC DESIGN RECOMMENDATIONS FROM THE PRELIMINARY GEOTECHNICAL REPORT , WHICH WOULD REDUCE IMPACTS INVOLVING SEISMIC GROUND SHAKING. THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

The project site is located within a seismically active region of southern California and is subject to strong ground shaking during a major earthquake. Although no active faults cross the property, several regional faults, described in Section 4.5.1, *Setting*, are capable of producing large seismic events that could affect the site (Appendix E).The proposed project would be required to comply with the CBC seismic design provisions, which establish minimum structural standards to reduce the risk of damage or collapse during an earthquake. Nevertheless, the project site may experience strong ground shaking during a major earthquake, which could result potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. This impact would be potentially significant.

Mitigation Measures

GEO-1 Geotechnical Design

The applicant's project design engineer shall incorporate the recommendations within of the *Geotechnical Investigation* prepared for the project into the project's grading and building plans. These include, but are not limited to, requiring existing fill and soft material to be excavated to firm native soil, the use of cut pads for compaction control, and the use of piers for stability of the residences. 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 a Zoning Clearance for the grading and building permits for the project. The applicant shall also retain a licensed geotechnical professional approved by the Planning and Environmental Review Director or designee prior to the start of construction. The licensed geotechnical professional shall be responsible for ensuring proper implementation of the recommendations within the final *Geotechnical Investigation* prepared for the project and providing a report to the Planning and Environmental Review Director or designee certifying the recommendations below have been incorporated into project design and throughout construction prior to the issuance of a certification of occupancy.

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 a Zoning Clearance for the grading and building permits. The Planning and Environmental Review Director or designee shall approve the licensed geotechnical professional prior to the start of construction. The licensed geotechnical professional shall submit the report to the Planning and Environmental Review Director or designee certifying the recommendations have been incorporated prior to the issuance of a certification of occupancy.

Monitoring. Once during the grading phase of construction, the Planning and Environmental Review Director or designee shall visit the project site to confirm with the licensed geotechnical professional that the construction contractor is implementing the applicable geotechnical recommendations.

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 structural integrity recommendations into the project, which would ultimately minimize the potential for the risk of loss, injury, or death involving strong seismic ground shaking.

Threshold 1(c): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Impact GEO-3 SOILS UNDERLYING THE PROJECT SITE ARE NOT LOOSE, SATURATED GRANULAR SOILS, AND HAVE NEGLIGIBLE LIQUEFACTION POTENTIAL. COMPLIANCE WITH THE CALIFORNIA BUILDING CODE WOULD ENSURE THE PROPOSED PROJECT WOULD MINIMIZE THE RISK OF LOSS, INJURY, OR DEATH INVOLVING LIQUEFACTION. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The project site is underlain by stiff to very hard clay and silt with localized weathered Rincon shale. Subsurface exploration did not encounter groundwater to the maximum depth explored (approximately 51 feet), and no loose granular layers were observed (Appendix E). These conditions are not conducive to liquefaction or lateral spreading, which typically require loose, saturated granular soils. The potential for liquefaction and associated lateral spreading at the project site is negligible. The proposed project's design would include implementation of standard engineering practices consistent with CBC requirements, such as foundation design and soil compaction techniques, which would reduce the potential for substantial adverse effects due to liquefaction. Therefore, the proposed project's impact related to directly or indirectly cause substantial adverse effects related to seismic-induced ground failure, including liquefaction, would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 1(d): Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Impact GEO-4 PORTIONS OF THE PROJECT SITE HAVE HIGH LANDSLIDE POTENTIAL. HOWEVER, MITIGATION MEASURE GEO-1 WOULD REQUIRE INCORPORATION OF DESIGN RECOMMENDATIONS FROM THE PRELIMINARY GEOTECHNICAL REPORT, WHICH WOULD REDUCE IMPACTS INVOLVING LANDSLIDE RISKS. THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

The northern portion of the project site is mapped within an area of high landslide potential, and the Rincon Formation underlying this area is susceptible to slope instability (Appendix E). The proposed project includes grading to create level building pads, with cut slopes up to approximately 14 feet high and combined cut slopes up to 18 feet high in the northern portion of the site. The proposed project includes development in an area identified as having a high landslide risk, includes development on slopes exceeding 20 percent. Proposed project construction would include cut slopes exceeding a grade of 1.5 horizontal to 1 vertical and a cut slope over 15 feet in height as measured from the lowest finished grade. These construction techniques would result in steep slopes that could increase the risk of a landslide occurring. Therefore, the proposed project's impact related to the risk of loss, injury, or death involving landslides would be potentially significant.

Mitigation Measures

Mitigation Measure GEO-1, described under Impact GEO-2, would be required.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to landslides on the project site to a less than significant level through incorporation of slope stability recommendations into the project, which would ultimately minimize the potential for the risk of loss, injury, or death involving landslides.

Threshold 2: Result in substantial soil erosion or the loss of topsoil?

Impact GEO-5 ON-SITE DEVELOPMENT HAS THE POTENTIAL TO INCREASE EROSION DURING AND AFTER CONSTRUCTION. COMPLIANCE WITH EXISTING REGULATIONS, INCLUDING THE CALIFORNIA BUILDING CODE AND THE CITY'S MUNICIPAL CODE, WOULD ENSURE THE PROPOSED PROJECT WOULD MINIMIZE THE POTENTIAL FOR THE PROJECT TO CAUSE SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Construction

The proposed project would involve over one acre of site disturbance during grading and the construction of residences, sidewalks, roadways, patios, landscaping, and associated facilities. Construction would involve grading of approximately 27,500 cubic yards of cut and 23,500 cubic yards of fill. This grading activity would involve vegetation removal and expose soil to erosion.

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. 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. As stated in Municipal Code Section 15.09.110, the City's Planning and Environmental Review Director or designee would review the SWPPP as part of the grading permit application to ensure the City's required elements of an erosion and sediment control plan are implemented within the SWPPP. 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 These requirements would minimize the potential for construction activities to result in substantial soil erosion or the loss of topsoil. As such, construction phase impacts would be less than significant.

Operation

During operation, the primary sources of erosion would be stormwater runoff from impervious surfaces and landscaped areas. However, the proposed project includes stormwater infrastructure designed to maintain pre-project runoff rates and minimize erosion. The proposed project would include a detention basin located in the western portion of the project site and an underground detention system located at the southern portion of the project site. The proposed detention basin and underground detention system have been sized to ensure the post-project peak runoff outflows would be the same as the pre-project peak runoff outflows for a 100-year flood event; thereby ensuring that erosion discharge from runoff into El Encanto Creek and the City's storm drain system would not be increased as a result of the proposed project (Appendix H). In addition, landscaping would include drought-tolerant native plants and smart irrigation systems to minimize overwatering and reduce erosion potential. Proposed project design would ensure that operation of the proposed project would minimize the potential to result in substantial soil erosion or the loss of topsoil. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 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?

Impact GEO-6 THE PROJECT SITE IS NOT AT RISK OF SUBSTANTIAL LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE. HOWEVER, THE PROJECT SITE IS LOCATED IN AN AREA SUSCEPTIBLE TO LANDSLIDES. COMPLIANCE WITH THE CALIFORNIA BUILDING CODE AND IMPLEMENTATION OF MITIGATION MEASURE GEO-1, GEOTECHNICAL DESIGN, WOULD MINIMIZE THE POTENTIAL FOR THE PROPOSED PROJECT TO RESULT IN RISKS RELATED TO UNSTABLE GEOLOGIC AND SOIL UNITS. THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

Unstable soils may experience landslides, lateral spreading, subsidence, liquefaction, or collapse during seismic events. As described in Impact GEO-3, on-site liquefaction and lateral spreading potential is negligible. Subsurface investigations of the project site did not identify groundwater underneath the project site to a depth of 51 feet (Appendix E). Accordingly, construction activities

would not require groundwater dewatering, and the proposed project construction would not induce subsidence. Project operation would not involve groundwater pumping on-site and therefore would not result in subsidence. Testing of on-site soils indicate that the site soils are dense and cohesive; therefore, the potential for collapse or subsidence is considered negligible and the proposed project would not risk collapse. However, as described in Impact GEO-4, the project site is subject to landslide risk, and project construction would involve the creation of steep slopes that could increase the potential for a landslide to occur. Accordingly, this impact would be potentially significant.

Mitigation Measures

Mitigation Measure GEO-1, described under Impact GEO-2, would be required.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to landslides on the project site to a less than significant level through incorporation of slope stability recommendations into the project, which would ultimately minimize the potential for on- or off-site landslides to occur.

Threshold 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?

Impact GEO-7 **THE PROJECT SITE SOILS HAVE A HIGH TO CRITICAL EXPANSION POTENTIAL. THE PROPOSED PROJECT WOULD BE CONSTRUCTED IN ACCORDANCE WITH THE REQUIREMENTS OF THE CALIFORNIA BUILDING CODE, AS WELL AS MITIGATION MEASURE GEO-1 WHICH WOULD MINIMIZE THE POTENTIAL FOR STRUCTURAL HAZARDS ASSOCIATED WITH EXPANSIVE SOILS. THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.***

Expansive soils are known to undergo volume changes in response to fluctuations in moisture content, which can result in differential movement, heaving, and cracking of foundations, slabs-on-grade, and other structural improvements. These conditions, if not properly addressed, can pose substantial risks to life and property. Expansive soils are present across the project site, particularly in near-surface deposits. Laboratory testing of representative samples yielded Plasticity Index values of 50 and 53, and an Expansion Index of 90, which indicate high to critical expansion potential consistent with expansive clay soils as defined in Table 18-1-B of the Uniform Building Code (Appendix E). The proposed project would be subject to the requirements of the CBC, which includes design standards for construction on expansive soils; however, given the high expansion potential of soils underlying the project site, the proposed project could still create a risk to life or property related to expansive soils. This impact would be potentially significant.

Mitigation Measures

Mitigation Measure GEO-1, described under Impact GEO-2, would be required.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to expansive soils on the project site to a less than significant level through incorporation of structural integrity recommendations into the project, which would ultimately minimize the potential for expansive soils to result in risks to life or property.

Threshold 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?

Impact GEO-8 THE PROPOSED PROJECT WOULD CONNECT TO THE EXISTING SEWER SERVICE PROVIDED BY GOLETA WEST SANITARY DISTRICT AND WOULD NOT REQUIRE THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS. NO IMPACT WOULD OCCUR.

The proposed project would include underground utility connections for sewer service provided by Goleta West Sanitary District and would not rely on septic tanks or alternative wastewater disposal systems. As the project would be connected to a public sewer system, the suitability of site soils for septic systems is not relevant to the proposed development. As such, the project would not result in impacts related to soils incapable of supporting septic tanks or alternative wastewater disposal systems.

Mitigation Measures

No mitigation measures are required.

Threshold 6:	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-9 GROUND-DISTURBING ACTIVITIES FOR THE PROJECT WOULD OCCUR WITHIN GEOLOGIC UNITS WITH HIGH OR UNDETERMINED PALEONTOLOGICAL SENSITIVITY AND, THEREFORE, MAY SIGNIFICANTLY IMPACT PALEONTOLOGICAL RESOURCES. WITH IMPLEMENTATION OF MITIGATION MEASURE GEO-2, THE PROPOSED PROJECT'S IMPACT TO PALEONTOLOGICAL RESOURCES AND UNIQUE GEOLOGIC FEATURES WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

As described in Section 4.5.1, *Setting*, the paleontological sensitivity of the artificial fill and Pleistocene-aged alluvium is undetermined greater than two feet below the ground surface. The paleontological sensitivity of the Rincon Formation is high greater than two feet below ground surface. The proposed project's construction activities include ground-disturbing activities (i.e., grading, excavating, trenching) which would require grading to a depth of up to eight feet. Such activities would occur greater than two feet below ground surface of the Pleistocene-aged alluvium and Rincon Formation, which could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. This impact would be potentially significant.

Mitigation Measures

GEO-2 Paleontological Resources Mitigation

Qualified Professional Paleontologist. Prior to excavation, the project applicant shall retain a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP 2010), who shall direct all mitigation measures related to paleontological resources. Selection of the Qualified Professional Paleontologist shall be subject to review and approval by the City.

Worker Environmental Awareness Program. Prior to the start of construction, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered. The names of all

construction personnel who have received this training shall be recorded and provided to the City upon request.

Paleontological Monitoring and Salvage. Paleontological monitoring shall be conducted by a paleontological monitor with experience with collection and salvage of paleontological resources and who meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor.

Paleontological monitoring shall occur during ground-disturbing activities that would disturb previously undisturbed sediments greater than two feet deep (e.g., grading, excavation, drilling of greater than two feet in diameter) throughout the entire project site. Monitoring shall consist of twice-per-week monitoring visits. Based on geological observations or the construction schedule, the Qualified Professional Paleontologist may recommend that monitoring be increased or reduced in frequency or ceased entirely, and such decisions shall be subject to review and approval by the City.

In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease, and the Qualified Professional Paleontologist shall evaluate the find. If the fossil(s) is (are) not scientifically significant, then construction activity may resume. If it is determined that the fossils may be scientifically significant, the following shall occur:

- **Fossil Salvage.** The fossil shall be salvaged (excavated and collected) to protect it from damage/destruction. Typically, fossils can be safely salvaged quickly by a single paleontological monitor with minimal disruption to construction. Larger fossils may require more extensive salvage operations. After fossil salvage is complete, construction activity within the area may resume.
- **Fossil Preparation and Curation**. Fossils shall be identified to the lowest (most-specific) possible taxonomic level, prepared to a curation-ready condition, and curated in a fossil repository per SVP (2010) standards, such as the Santa Barbara Museum of Natural History, along with all pertinent data, photos, and/or maps required by the repository.
- **Final Paleontological Mitigation Report.** Upon completion of ground-disturbing activities (or preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a final report describing the paleontological mitigation program's results. The report shall include a summary of the field and laboratory methods employed; an overview of project geology; and, if applicable, an analysis of the recovered fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the City and, if fossil curation occurred, the designated fossil repository.

Plan Requirements and Timing. The Planning and Environmental Review Director or designee shall approve the Qualified Professional Paleontologist prior to the issuance of a Zoning Clearance for a grading permit. The qualified professional paleontologist shall conduct WEAP training prior to the start of ground-disturbing activities and submit a signed form to the Planning and Environmental Review Director within 24 hours following the completion of WEAP training. The Qualified Professional Paleontologist or designated paleontological resource monitor shall observe grading and drilling activities throughout undistributed construction areas on-site on a twice-per-week monitoring schedule. If a fossil is discovered, the qualified professional paleontologist shall submit the Final Paleontological Mitigation Report to the Planning and Environmental Review Director or designee within 90 days of completion of salvage and preparation. If curation occurred, the qualified professional paleontologist shall also submit the Final Paleontological Mitigation Report to the Santa Barbara Museum of Natural History.

Monitoring. The Planning and Environmental Review Director or designee shall review and approve the form provided by the qualified professional paleontologist certifying WEAP training was completed. The Planning and Environmental Review Director or designee shall confirm the Qualified Professional Paleontologist or designated paleontological resource monitor observed grading and drilling activities. The Planning and Environmental Review Director or designee shall review and approve the Final Paleontological Mitigation Report, if applicable.

Significance After Mitigation

Mitigation Measure GEO-2 would reduce potentially significant impacts to paleontological resources to a less than significant level through construction monitoring and construction personnel training to ensure that paleontological resources that may be encountered during construction are collected and curated in a designated fossil repository.

4.5.4 Cumulative Impacts

The cumulative impact analysis considers City-wide impacts that would occur from cumulative projects identified in Table 3-1 of Chapter 3, *Related Projects*, located in areas subject to seismic hazards and on geologic units with paleontological sensitivity. The general approach to cumulative impact analysis used in this EIR is discussed in Chapter 3, *Related Projects*.

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 considerable impacts. Cumulative geology and soils impacts would be less than significant.

Areas throughout Goleta would continue to be developed and redeveloped and involve grading and excavation activities that would potentially encounter paleontological resources. Given the high sensitivities of geologic units underlying Goleta, cumulative projects could potentially damage paleontological resources or unique geologic features. Therefore, cumulative impacts would be potentially significant. Ground-disturbing activities associated with the proposed project have the potential to result in the destruction, damage, or loss of undiscovered scientifically important paleontological resources due to the high paleontological sensitivity of the underlying geologic units. However, implementation of Mitigation Measure GEO-2 would minimize the potential for the proposed project to cause a substantial adverse change in known or unknown paleontological resources by requiring WEAP training, monitoring, and setting forth procedures for the recovery, identification, and curation of fossils discovered during construction. Therefore, with mitigation, the proposed project's contribution to cumulative impacts related to paleontological resources or unique geologic features would not be considerable.

4.6 Greenhouse Gas Emissions

The section analyzes the potential greenhouse gas (GHG) emissions impacts of project construction and operation. This section is based, in part, on the *CalEEMod Memorandum for the Shelby Property Residential Project* (Appendix C).

4.6.1 Setting

4.6.1.1 Physical Scientific Basis of Climate Change

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface, and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. Infrared radiation is absorbed by GHGs. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth. Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Human-caused emissions of these GHGs in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of unnatural warming of the earth's climate, known as global climate change or global warming (Intergovernmental Panel on Climate Change [IPCC] 2021).

Climate change is a global issue. GHGs are global pollutants with very long atmospheric lifetimes (some last several thousand years). They stand in contrast to criteria pollutants and toxic air contaminants, which have localized air quality effects with relatively short atmospheric lifetimes (about one day). The atmospheric concentrations of CO_2, CH_4, and N_2O have increased to levels unprecedented in at least the last 800,000 years. CO_2 concentrations have increased by 40 percent since pre-industrial times, primarily from fossil fuel emissions and secondarily from net land use change emissions such as deforestation and urban development. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatons of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius between 2010 and 2019 (IPCC 2021).

Because GHG emissions have global impacts, the quantity of GHGs that it takes to ultimately result in climate change is not precisely known; the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature or to global, local, or microclimate.

4.6.1.2 Adaptation to Climate Change

Resource areas other than air quality and global average temperature could be indirectly affected by the accumulation of GHG emissions. For example, an increase in the global average temperature is expected to result in a decreased volume of precipitation falling as snow in California and an overall reduction in snowpack in the Sierra Nevada. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), and is a major source of water supply for the state. 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). An increase in precipitation falling as rain rather than snow also could lead to increased potential for floods because water that would normally be held in the Sierra Nevada snowpack until spring could run off and flow into the Central Valley concurrently with winter storm events (California Natural Resource Agency 2019).

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). By 2100, scientists project the sea will rise between one-foot and 6.6 feet (National Aeronautics and Space Administration 2025). 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).

4.6.1.3 Greenhouse Gas Emission Sources

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, electric utility, residential, commercial, and agricultural uses. Emissions of CO_2 are primarily byproducts of fuel combustion. CH_4, a highly potent GHG, typically results from fugitive emission sources such as agricultural activities and landfills. N_2O is also largely attributable to agricultural activities and soil management. Smaller amounts of CH_4 and N_2O emissions occur as a byproduct of fuel combustion. CO_2 sinks, or reservoirs, include vegetation and the ocean, and absorb CO_2 through sequestration and dissolution, respectively. In California, the transportation sector is the largest emitter of GHGs at 39 percent of total GHG emissions, followed by the industrial sector at 23 percent of total GHG emissions, and electricity generation at 11 percent of total GHG emissions (California Air Resources Board [CARB] 2024).

California is one of the larger emitters of GHGs in the world. In 2022, California released 371 million metric tons (MMT) of CO_2 equivalent (CO_2e) (CARB 2024). The City of Goleta conducted a GHG emissions inventory in the City for 2007, which represents the baseline inventory, or existing conditions in Goleta. 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).

CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential (GWP), is a measure of the heat-trapping ability of a given GHG over a 100-year period relative to the heat-trapping ability of CO_2. CO_2 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 (IPCC 2021).

Expressing individual GHG emissions as CO_2e converts the heat-trapping ability and longevity of the individual GHGs to a common basis that is equivalent to the effect that would occur if only CO_2 were being emitted.

4.6.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations applicable to the proposed project.

b. State Regulations

California Air Resources Board

CARB, a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets state ambient air quality standards, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan, for which it works closely with the federal government and the local air districts.

Assembly Bill 32 and Senate Bill 32

The California Global Warming Solutions Act of 2006 (Assembly Bill [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. 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).

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.

California Air Resources Board 2022 Scoping Plan

In response to the passage of AB 1279 and the identification of the 2045 GHG reduction target, CARB published the Final 2022 Scoping Plan in November 2022 (CARB 2022). The 2022 Scoping Plan 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 Scoping Plan 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 Scoping Plan assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as 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.

The 2022 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 support building decarbonization, access to shared mobility services or transit, and electric vehicle (EV) charging. According to the 2022 Scoping Plan, these attributes are a guide to determine projects that are clearly consistent with the state's climate strategy for CEQA purposes and are not necessarily required, and a project that incorporates some but not all of the key project attributes may still be consistent with the state's climate goals.

Senate Bill 375

The Sustainable Communities and Climate Protection Act (SB 375), signed in August 2008, enhances the state's ability to reach AB 32 goals by directing 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 are required to adopt a Sustainable Communities Strategy (SCS), which allocates land uses in the Metropolitan Planning Organization'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 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) would demonstrate that the SBCAG region would achieve its initial regional emissions reduction targets for the 2035 target year.

Senate Bill 1383

Adopted in September 2016, SB 1383 (Lara, Chapter 395, Statutes of 2016) requires 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 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 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.

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 are 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.

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. It also includes voluntary tiers to encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design.

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 California Energy Commission, 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.

Senate Bill 1020

Adopted on September 16, 2022, the Clean Energy, Jobs, and Affordability Act (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.

c. Local Regulations

Santa Barbara County Association of Governments Connected 2050

SBCAG adopted its 2050 RTP/SCS (titled Connected 2050) in August 2021 and updated the plan in August 2025. 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/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 emissions associated with vehicle travel. This trip reduction would be achieved by addressing regional jobs/housing imbalance through provision of more housing on the jobs-rich South Coast and more jobs in the North County and promoting more local and inter-city trips on alternative transportation modes, including by foot, bike, or transit. The 2050 RTP/SCS meets and exceeds CARB's 17 percent per capita reduction targets for GHG emissions from passenger vehicles for target year 2035 (SBCAG 2025).

The 2050 RTP/SCS also includes specific goals and objectives aimed at guiding the implementation of future development in the SBCAG region. Specific policies applicable to the proposed project include (SBCAG 2025):

- **1.1:** The planning, construction, and operation of transportation facilities shall be coordinated with local land use planning and should encourage local agencies to:
    - Make land use decisions that adequately address regional transportation issues and are consistent with the RTP-SCS.

  - Promote better balance of jobs and housing to reduce long-distance commuting by means of traditional land use zoning, infill development, and other, unconventional land use tools, such as employer-sponsored housing programs, economic development programs, commercial growth management ordinances, average unit size ordinances and parking pricing policies.
  - Plan for Transit-Oriented Development (TOD) consistent with the RTP-SCS by:
    - Concentrating residences and commercial centers in urban areas near rail stations, transit centers and along transit development corridors.
    - Designing and building "complete streets" serving all transportation modes that connect high-usage origins and destinations.
  - Preserve open space, agricultural land and sensitive biological areas.
  - Identify, minimize and mitigate adverse environmental impacts and, in particular, require mitigation of traffic impacts of new land development through on-site and related off-site improvements for all modes of transportation, including incentives to encourage the use of alternative transportation modes.
  - Dissuade siting of new development in high-fire risk areas by means such as ensuring insurability and redundancy of ingress and egress.

- **3.2:** SBCAG shall encourage local agencies to:
  - Address and plan for forecast regional housing needs for all economic segments of the population.
  - Plan for adequate affordable and workforce housing within existing urbanized areas near jobs and public transit.
  - Consider transit availability and accessibility as an integral element of land use planning and project permitting, with special emphasis on serving the disabled, elderly, and other transit-dependent communities.
  - Recognize that housing provided by colleges and universities is an important component in addressing the region's overall housing needs, which should be taken into account in local agencies' own housing planning.

Santa Barbara County 2030 Climate Action Plan

On August 27, 2024, the County adopted the 2030 Climate Action Plan (CAP) to reduce GHG emissions 50 percent below 2018 levels by 2030. 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 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 (County of Santa Barbara 2024).

Goleta Climate Action Plan

Adopted in July 2014, the City of Goleta's CAP (City of 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. Applicable measures include:

- **RE-1:** Continue Implementation of Ordinance Requiring Construction of Solar Ready Buildings.
- **RE-4:** Encourage Solar Installation in New Residential.
- **T-7:** Implement General Plan Policy TE 11: Bikeways Plan.
- **WR-1:** Continue Compliance with SB X7-7: Reduce Per Capita Urban Water Use.

City of Goleta General Plan/Coastal Land Use Plan

The City of 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 (City of Goleta 2005a, 2006b):

- **CE 13.1: Energy Efficiency in Existing and New Residential Development.** The City shall promote the following practices in existing and new residential construction:
  - Retrofitting of existing residential structures to reduce energy consumption and costs to owners and tenants is encouraged. These retrofits may include: increased insulation, weather stripping, caulking of windows and doors, low-flow showerheads, and other similar improvements. Master metering is discouraged, and conversions to individual metering where practicable is preferred.
  - 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.
  - New residential development and additions to existing homes shall be designed to provide a maximum solar orientation when appropriate, and shall not adversely affect the solar access of adjacent residential structures. Use of solar water heating systems, operational skylights, passive solar heating, and waste heat recovery systems is encouraged.
- **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:
  - 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.
  - 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.
  - 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.
- **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.
- **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.

- **TE 11.1: Bikeways Plan Map.** Figure 7-6 [of the Transportation Element] identifies the locations of planned Class I, II, and III dedicated bike paths and local streets that are intended to serve as bike routes. The bikeways plan is intended to establish a safe, interconnected system of bikeways that is linked to walkways and trails to meet existing and anticipated mobility needs of residents for nonmotorized transportation. The plan includes links with existing and proposed bicycle routes in adjacent jurisdictions to interconnect with the regional system of facilities.

City of Goleta Municipal Code

Section 15.12.040 of the City's Municipal Code mandates that new single-family residences stall one Level 2 electric vehicle charging receptacles per residential unit. If a second parking space is provided at the residence, the space must include a Level 1 electric vehicle charging receptacle.[1]

Section 17.38.040 of the City's Municipal Code sets forth required parking spaces within the various zoning districts within Goleta. For single family residential development, the City's Municipal Code requires two covered parking spaces per dwelling unit.

4.6.3 Impact Analysis

4.6.3.1 Methodology and Significance Thresholds

Methodology

This analysis is based on the *CalEEMod Memorandum for the Shelby Property Residential Project* (Appendix C). As detailed therein, emissions from construction and operation of the proposed project were estimated using CalEEMod, Version 2022. Construction was assumed to last 18 months, starting in January 2027 and ending in June 2028. Operational emissions were assumed to begin in 2028 following the completion of construction. Full model assumptions are included in Appendix C. As described in Section 4.2, *Air Quality*, the City, as a Condition of Approval, would require the use of construction equipment that meets the Tier 4 emissions standards set by the United States Environmental Protection Agency for non-road diesel engines. The CalEEMod modeling outputs provided in this analysis are modeled based on the use of Tier 4 construction equipment.

Construction-related emissions were estimated to be generated from heavy-duty construction equipment and on-road vehicle exhaust emissions as well as the removal of and addition of vegetation. Occupational emissions would be generated from resident and visitor vehicle trips to and from the proposed project. Area source GHG emissions are a result the usage of landscape maintenance equipment. Additionally, the proposed project would consume electricity and potable water, both of which generate GHG emissions associated with electricity production used to transport the water.

GHG emissions associated with construction and occupation of the proposed project would predominantly be in the form of CO_2, and are presented in the form of CO_2e. While emissions of other GHGs, such as CH_4 and N_2O, are important with respect to global climate change, the proposed project is not expected to emit substantial quantities of GHGs other than CO_2, even when factoring in the relatively larger GWP of CH_4 and N_2O. This is because most emissions from the proposed project would be associated with vehicular emissions (i.e., mobile-source emissions), natural gas combustion, and indirect emissions associated with the purchase of electricity. Although these sources emit small quantities of N_2O and CH_4, emissions of CO_2 would dominate the GHG emissions from the proposed

[1] A Level 2 electric vehicle charger uses 240 volt outlets while a Level 1 electric vehicle charger operates on a 120 volt outlet.

project. Emissions of perfluorocarbons and sulfur hexafluoride are typically associated with industrial facilities and would not be emitted as a result of the proposed project.

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on GHG emissions. Would the project:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Most individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be considerable. "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. 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, the County of Santa Barbara adopted the 2030 CAP to reduce GHG 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 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 consistency with the 2030 CAP, residential projects must be reviewed compared to a GHG efficiency threshold of 2.68 MT CO_2e per resident per year, as stated within the County's 2024 *Environmental Thresholds and Guidelines Manual*. The City has consistently relied on these standards as the methodology for establishing a threshold for analyzing the potential greenhouse gas impacts of a project. Therefore, project GHG emissions are evaluated based on thresholds established in the County of Santa Barbara's 2030 CAP.

In addition, the proposed project is evaluated based on its consistency with the 2022 Scoping Plan, the 2050 RTP/SCS, the City of Goleta General Plan/Coastal Land Use Plan, and the City of Goleta's CAP. Specifically, the analysis considers consistency of the project with plans, policies, and regulations adopted for the purpose of reducing GHG emissions.

4.6.3.2 Project Impacts and Mitigation Measures

Threshold 1:	Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1 THE PROPOSED PROJECT'S CONSTRUCTION AND OPERATIONAL GREENHOUSE GAS EMISSIONS WOULD NOT EXCEED THE THRESHOLD OF 2.68 METRIC TONS CARBON DIOXIDE EQUIVALENT PER YEAR PER RESIDENT. 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. As the project site is used for storage, which is not a GHG-intensive use, the impacts are assessed relative to the baseline, which assumes negligible GHG emissions currently occurring at the project site.

Construction-related GHG emissions associated with heavy-duty construction equipment, material delivery trucks, and construction worker trips would occur intermittently during construction of the proposed project. Following completion of the proposed project, construction-related GHG emissions would cease. Therefore, these emissions are considered temporary and short-term in nature. Table 4.6-1 presents the GHG emissions generated during proposed project construction activities. The construction is assumed to occur over the course of a period of 18 months, and thus the estimated emissions reflect a peak annual emission rate from construction activities. As shown in Table 4.6-1, the proposed project's construction activities would generate approximately 565 MT of CO_2e. Amortized over 30 years, construction GHG emissions would total 18.8 MT of CO_2e. Per guidance in the County's 2024 *Environmental Thresholds and Guidelines Manual,* as construction GHG emissions are temporary and short-term in nature, the proposed project's impact related to GHG emissions are evaluated based on the proposed project's annual amortized construction emissions over the lifetime of the project (a default lifetime of 30 years) combined with annual operational emissions.

Operation of the project would generate GHG emissions associated with area sources (e.g., landscape maintenance), energy and water usage, refrigerant usage, vehicle usage (employee trips), and wastewater and solid waste generation. Table 4.6-2 shows the combined estimated annual construction and operational emissions associated with the proposed project based on GHG emissions per resident, consistent with the County's GHG threshold. As shown therein, the proposed project's combined construction and operational emissions would not exceed the County's 2.68 MT CO_2e per resident per year threshold. Therefore, the proposed project would not generate substantial GHG emissions directly or indirectly that may have a significant impact on the environment. This impact would be less than significant.

Table 4.6-1 Estimated Construction-Related GHG Emissions

Year	Emissions (MT CO_2e)
2027	462
2028	103
Total	**565**

MT = metric tons; CO_2e = carbon dioxide equivalent

Source: Appendix C

Table 4.6-2 Quantitative Assessment of Estimated Project Occupational Annual GHG Emissions

Emission Source	Emissions (MT CO_2e)
Total GHG Emissions	324
Amortized Construction Emissions	18.8
Total With Amortized Construction Emissions	**342.8**
Proposed Project GHG Emissions Per Resident	2.36
GHG Threshold	**2.68**
Exceeds Threshold?	**No**

MT = metric tons; CO_2e = carbon dioxide equivalent
Source: Appendix C

Mitigation Measures

No mitigation is required.

Threshold 2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2 PROJECT CONSTRUCTION AND OPERATION WOULD BE CONSISTENT WITH APPLICABLE PLANS, POLICIES, AND REGULATIONS ADOPTED FOR THE PURPOSE OF REDUCING GREENHOUSE GAS EMISSIONS, INCLUDING THE 2022 SCOPING PLAN, 2050 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY, CITY OF GOLETA GENERAL PLAN/COASTAL LAND USE PLAN, AND CITY OF GOLETA'S CLIMATE ACTION PLAN. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Consistency With Applicable Plans and Policies

2022 Scoping Plan

The 2022 Scoping Plan reflects the statewide 2030 target of a 40 percent reduction below 1990 emissions levels codified by SB 32 and the statewide 2045 target of an 85 percent reduction below 1990 emissions levels and carbon neutrality codified by AB 1279. Table 4.6-3 evaluates the proposed project's potential to conflict with the applicable measures in the 2022 Scoping Plan, including the local actions provided in Appendix D of the Scoping Plan. According to the 2022 Plan, these local actions are a guide to determine projects that are clearly consistent with the state's climate strategy for CEQA purposes. A project that incorporates some but not all of the key project attributes may still be consistent with the state's climate goals, subject to a determination from lead agencies with adequate additional supporting evidence. The proposed project would be consistent with all local actions, save for the provision of at least 20 percent of units affordable to lower income levels. The proposed project includes 20 percent deed-restricted units, four of which would be designated for extremely low income and one of which would be designated for low income, resulting in 9 percent of units deed-restricted for low income. Although the proposed project would not fully meet 20 percent affordable housing, the proposed project would be consistent with the other applicable measures of Appendix D. The proposed project would be overall consistent with the 2022 Scoping Plan because the proposed project would incorporate several key attributes to minimize GHG emissions specified in the 2022 Scoping Plan, including the no net loss of affordable housing, installation of electric vehicle charging receptacles, building electrification, and installation of a Class

I bike trail to facilitate increased bicycle travel. As stated above, a project that incorporates some but not all of the key project attributes may still be consistent with the state's climate goals. Because the proposed project would be consistent with all other Appendix D local actions and would still include the provision of some affordable housing, the proposed project would overall be consistent with the 2022 Scoping Plan.

Table 4.6-3 Proposed Project Consistency with the 2022 Scoping Plan

Project Attributes	Consistency
Transportation Electrification	
Provides electric vehicle charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.	**Consistent.** In accordance with Section 15.12.040 of the City's Municipal Code, the proposed project would include at least one electric vehicle charging receptacle per residential unit.
VMT Reduction	
Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).	**Consistent.** The proposed project would develop the primarily vacant project site for housing. The project site is served by existing utilities and proximate to existing public services.
Do not result in the loss or conversion of the State's natural and working lands.	**Consistent.** The project site is a currently underused parcel that does not contain existing natural lands (i.e., forests, green spaces) or active working lands (i.e., farms, orchards, vineyards, rangelands).
Consists of transit-supportive densities (minimum of 20 residential dwelling units/acre), or Is in proximity to existing transit (within ½ mile), or Satisfies more detailed and stringent criteria specified in the region's Sustainable Communities Strategy.	**Consistent.** The nearest bus stop to the project site is located approximately 0.2-mile west of the project site at the intersection of Cathedral Oaks Road and Brandon Drive. The proposed project would also include the continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road which could provide access to existing transit stops east of the project site. In addition, the proposed project would satisfy the Connected 2050 Policy 3.2 which encourages the development of housing to address forecasted regional housing needs for all income levels.
At least 20 percent of the units are affordable to lower-income residents.	**Inconsistent.** As described in Chapter 2, *Project Description*, the proposed project application includes 20 percent of the proposed residential units as deed-restricted units for specific household incomes; however, 9 percent of units would be specified for lower income residents.
Result in no net loss of existing affordable units.	**Consistent.** The proposed project would include the demolition of one existing residence on-site; however, the residence is vacant. The proposed project would not reduce the amount of existing affordable units available in Goleta.
Building Decarbonization	
Use all electric appliances, without any natural gas connections, and would not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	**Consistent.** The proposed project would be all-electric and would not use natural gas. The proposed project does not include the use of propane.

SBCAG 2050 RTP/SCS

The SBCAG 2050 RTP/SCS is designed to help the region achieve its SB 375 GHG emissions reduction target. The 2050 RTP/SCS demonstrates that the SBCAG region would achieve its regional emissions reduction targets for the 2020 and 2035 target years. Policy 1.1 of the 2050 RTP/SCS aims to promote a "better balance of jobs and housing to reduce long-distance commuting by means of traditional land use zoning" (SBCAG 2025). As described in Chapter 2, *Project Description,* the proposed project would utilize the "Builder's Remedy" protections of the California Housing Accountability Act, which would allow for the development of housing within the Agriculture II zone. The addition of housing in the Agriculture II zone would provide additional flexibility to traditional land use zoning to increase the local housing supply in Goleta, thereby providing employees who work in Goleta with additional opportunities to relocate closer to their place of work and reduce long-distance commuting. Therefore, the proposed project would be consistent with Policy 1.1. In addition, Policy 3.2 2050 RTP/SCS aims to "plan for adequate affordable and workforce housing within existing urbanized areas near jobs and public transit" (SBCAG 2025). The proposed project includes the provision of affordable housing within 0.2-mile of existing transit facilities. Therefore, the proposed project would be consistent with Policy 3.2.

City of Goleta General Plan/Coastal Land Use Plan

The City of Goleta General Plan/Coastal Land Use Plan includes a conservation element that promotes strategies for water conservation which, in turn, reduce GHG emissions. 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. The project would be consistent with Transportation Element Policy TE 1.1 by placing residential development within proximity to existing transit and bicycle facilities on Cathedral Oaks Road. The proposed project would also be consistent with Transportation Element Policy TE 11.1 by including the continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road, consistent with the City's bikeways plan map. The proposed residences would not utilize natural gas and would be constructed in accordance with the energy reduction standards set forth in CALGreen and the Building Energy Efficiency Standards, including the CALGreen requirements for the installation of solar photovoltaic panels which would be consistent with Conservation Element Policy CE 13.1 and Policy CE 13.3. Based on the above, the proposed project would be consistent with policies in the City of Goleta General Plan/Coastal Land Use Plan which assist in reducing GHG emissions.

City of Goleta Climate Action Plan

The City of Goleta's CAP is a long-range plan to reduce GHG emissions from city government operations and community activities within Goleta. In addition, the City of Goleta's CAP contains policies and programs targeting energy efficiency policy. The CAP ensures that the City does its part to contribute to the goals of California's AB 32 and its successor legislation, SB 32.

The proposed residences include solar in accordance with the Title 24 Building Energy Efficiency Standards for solar on residential land uses. This would align with align with Policy RE-1 of the City of Goleta's CAP, which requires the City to continue implementation of a solar-ready ordinance requiring buildings to be constructed such that solar installation is possible, and Policy RE-4 of the City of Goleta's CAP, which requires the City to encourage solar installation in new residential development. The proposed project includes the continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road which would promote alternative modes of

transportation for residents and be consistent with Policy T-7 of the City of Goleta's CAP, which requires implementation of the City of Goleta General Plan/Coastal Land Use Plan Policy TE 11. The proposed project's landscaping would include low-volume spray heads, bubblers, and drip systems, which would be controlled by an automatic timer with a seasonal adjustment to apply less water during the rainy season and minimize water use. In addition, the proposed residences would incorporate energy-efficient design features consistent with Title 24 of the California Building Code, including the use of low-flow plumbing fixtures. These water efficiency design features would assist to minimize water use consistent with Policy WR-1, which encourages residents to implement water retrofits and utilize water-efficient landscaping to reduce per capita water consumption. The proposed project would be consistent with the policies outlined in the City of Goleta's CAP.

Conclusion

The plan consistency analysis provided above demonstrates that overall the proposed 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/Coastal Land Use Plan, and City of Goleta's CAP. Overall consistency with the above plans, policies, and GHG reduction measures would ensure that the proposed project's incremental contribution of GHG emissions would not inhibit the ability of the state to meet its GHG reduction goals.

Therefore, the proposed project's impact related to conflicts with any applicable plans, policies, and measures an agency adopted for the purpose of reducing emissions of GHG emissions would be less than significant.

Mitigation Measures

No mitigation is required.

4.6.4 Cumulative Impacts

The impacts of GHG emissions and climate change are, by definition, cumulative impacts. The geographic scope for considering cumulative impacts related to GHG emissions is the state of California. This geographic scope is appropriate, as the State has set forth goals for reducing cumulative statewide GHG emissions. Although GHG emissions have worldwide repercussions, the contribution of cumulative projects to GHG impacts is addressed in light of the goals for reducing statewide emissions. Past development statewide has resulted in substantial GHG emissions such that the state has established the following statewide emissions reductions targets:

- By 2030, reduce GHG emissions to 40 percent below 1990 levels.
- By 2045, reduce GHG emissions to 85 percent below 1990 levels.

The construction and operation of development statewide would emit GHG emissions which have the potential to exceed applicable GHG emissions thresholds established by cities, counties, air pollution control districts, or other relevant agencies. Such projects that would result in GHG emissions above a threshold level could still be developed through as Statement of Overriding Considerations which permits a project even if it would have significant and unavoidable impacts. These GHG emissions thresholds enforced by local agencies are designed to assist the local agency in contributing to statewide emissions reductions targets. Given that development could occur even if it would exceed local GHG emissions thresholds, cumulative impacts related to GHG emissions would be significant.

GHG impacts are assessed in a cumulative context since no single project can cause a discernible change to the climate. Therefore, the proposed project's potential to contribute to significant cumulative GHG impacts is evaluated based on the same thresholds as used for project-level evaluation. In the absence of a City-adopted numeric threshold, the significance of the proposed project's GHG emissions is evaluated on the County's threshold of 2.68 MT CO_2e per resident 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, the 2050 RTP/SCS, the City of Goleta General Plan/Coastal Land Use Plan, and the City of Goleta's CAP.

As discussed in Impact GHG-1, the proposed project would not exceed the County's 2.68 MT CO_2e per resident per year threshold. 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 iteration of CALGreen and the Building Energy Efficiency Standards. Furthermore, the proposed project would not convert natural lands and would contribute to the job and housing balance by increasing the local housing supply in Goleta, thereby providing employees who work in Goleta with additional opportunities to relocate closer to their place of work and reduce long-distance commuting. Thus, the proposed project's contribution to cumulative GHG impacts would not be considerable.

4.7 Hazards and Hazardous Materials

This section identifies and evaluates issues related to hazards and hazardous materials in the context of the proposed project. The section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to hazards and hazardous materials; and potential impacts related to hazards and hazardous materials that would result from implementation of the proposed project. The background information and analysis in this section is based partially on the *Phase I Environmental Site Assessment* (Phase I ESA) prepared for the proposed project by Dudek in September 2025 (Appendix F) and the *Fire Safety and Wildland Fire Protection Plan* prepared for the proposed project by Resolute Associated LLC in October 2025 (Appendix G).

4.7.1 Setting

a. Overview of Hazardous Materials

The term "hazardous materials" has different definitions for different regulatory programs. For the purpose of this Environmental Impact Report (EIR), the term "hazardous materials" refers to both hazardous materials and hazardous waste. California Health and Safety Code Section 25501(n)(1) defines a hazardous material as any material that "because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity. These types of hazardous materials are defined below:

- **Toxic Substances.** Toxic substances are materials that are poisonous to living organisms and can cause health effects. Carcinogens, substances that can cause cancer, are a special class of toxic substances. Examples of toxic substances include benzene (a component of gasoline and suspected carcinogen) and lead (a known carcinogen).
- **Ignitable Substances.** Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.
- **Corrosive Materials.** Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- **Reactive Materials.** Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

b. Overview of Project Site

The project site is currently a large fallow field containing a 2,015-square-foot residence, 726-square-foot garage, and 1,152-square-foot barn. The project site is currently used for the storage of woodchips and firewood.

In 1943, the project site was developed with an orchard. Agricultural development as an orchard was first observed on the project site as early as 1942. The project site was used for the agricultural

cultivation of avocado orchards from the 1960s to 1995. In 1999, the residence, garage, and barn were constructed on the project site. Based on aerials of the project site, a dirt road was created on the southern border of the project site between 2002 and 2005. Since 2005, the project site has remained essentially the same, aside from small debris piles along the southern and eastern border of the project site. During the Phase I ESA site reconnaissance, various containers of hazardous substances and petroleum products, including paint, gasoline, motor oil, and propane, were observed outside of the southernmost structure on the project site (Appendix F).

c. Hazardous Substances

Asbestos

According to the United States Environmental Protection Agency (USEPA), asbestos is used in a variety of building construction materials for insulation and as a fire retardant due to its durability and heat resistance. Most uses of asbestos are not banned in the United States (USEPA 2025a). However, in 1973, USEPA banned spray-applied surfacing asbestos-containing material (ACM) for fireproofing/insulating purposes (USEPA 2025b). A full ban of asbestos did not occur until 2019 (Appendix F). Asbestos fibers may be released into the air by the disturbance of ACM during product use and demolition work. Exposure to asbestos could lead to harmful health effects and increased risk of developing lung disease (USEPA 2025a). Based on the age of the residence, garage, and barn on-site, there is potential for these buildings to contain ACM.

Lead Based Paint

Lead is a naturally occurring element that can be toxic to humans and animals, and exposure can result in health effects, especially in children. Lead and lead compounds have been used in a variety of consumer products, including lead-based paint (LBP), ceramics, pipes and plumbing materials, solders, gasoline, batteries, ammunition, and cosmetics (USEPA 2025c). In 1978, consumer uses of lead-based paint were banned in residential buildings; however, the use of LBP in commercial and industrial buildings is not prohibited (USEPA 2025d; Appendix F). Based on the age of the residence, garage, and barn on-site, there is potential for these buildings to contain LBP.

Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) are a group of man-made organic chemicals which have a range of toxicity and vary in consistency from thin, light-colored liquids to yellow or black waxy solids. Due to their non-flammability, chemical stability, high boiling point, and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications including electric and heat transfer, pigments, dyes, and other industrial applications. PCBs have also been used commercially in products and materials such as fluorescent light ballasts, electrical equipment, motors and hydraulic systems, adhesives and tapes, and caulking. In 1979, PCB manufacturing was banned in the United States (USEPA 2025e). No evidence of substantial PCB contamination was identified during field reconnaissance conducted to inform the Phase I ESA.

Mercury

Mercury is a naturally occurring element that can be toxic to humans and animals, and mercury exposure can result in health effects, especially in children. Mercury and mercury compounds have been used in a variety of consumer products, including thermometers and thermostats, electronic devices, batteries, automotive parts, appliances, topical medicine, wood preservative, and fungicide

(USEPA 2025e). Most uses of mercury have been discontinued in the United States, including the phase-out of mercury in batteries since 1996 (USEPA 2025f). Based on the age of the residence, garage, and barn on-site, there is not substantial potential for mercury-containing products to be present in the building materials of these structures.

Radon

Radon is a radioactive gas that is produced from the natural decay of uranium, radium, and thorium in soil, rock, and groundwater. When radon becomes trapped in buildings and concentrations accumulate, exposure to radon can be a concern as radon is linked to harmful effects such as lung cancer. Radon gas studies performed by the California Bureau of Mines and Geology and the Department of Health Services through 1995 indicate that Santa Barbara County falls within the Zone 1 designation, which suggests that there is a low to moderate potential for exposure to radon gas at or above the USEPA recommended level of 4.0 pico curies per liter (pCi/L). The Radon Zone Map for Santa Barbara County produced by the Bureau of Mines and Geology indicates that the project site is in an area with high potential for indoor radon levels exceeding USEPA recommended level of 4.0 pCi/L (California Department of Conservation 2000).

d. Known Hazardous Materials Sites

California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to maintain an updated Hazardous Waste and Substances Sites List, also known as the Cortese List. The list includes specific types of hazardous waste and substances sites, such as hazardous waste facilities subject to corrective action, hazardous substance release sites selected for and subject to a response action pursuant to California Health and Safety Code Section 78760 et. seq, all underground storage tanks for which an unauthorized release report is filed, all solid waste disposal facilities from which there is a migration of hazardous waste, and sites subject to cease and desist and cleanup and abatement orders that concern the discharge of wastes that are hazardous materials. The following databases were searched in August 2025 for records related to any known hazardous materials contamination at the project site:

- State Water Resources Control Board's (SWRCB) GeoTracker database (SWRCB 2025a)
- SWRCB's list of solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit (SWRCB 2025b)
- California Department of Toxic Substances Control's (DTSC) EnviroStor database (DTSC 2025)
- Superfund Enterprise Management System database (USEPA 2025g)
- CalEPA Active Cease and Desist Orders and Cleanup Abatement Orders (CalEPA 2025a)
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (CalEPA 2025b)

The project site is not listed as a site with active Cease and Desist Orders or Cleanup Abatement Orders. Based on a review of the databases listed above, there are no known hazardous materials sites on the project site, on adjacent properties, or nearby properties within 1,000 feet of the project site.

e. 2025 Phase I Environmental Site Assessment

The Phase I ESA conducted for the proposed project identifies the potential for Recognized Environmental Conditions[1] on the project site. The Phase I ESA concluded that "considering the long-term agricultural use and lack of redevelopment of the property, there is a potential for elevated concentrations of pesticide- and herbicide-related compounds in surface soils." No other potential environmental concerns were identified at the project site in the Phase I ESA (Appendix F).

As part of the Phase I ESA, soil sampling was conducted at the project site to determine the extent of residual organochlorine pesticides and arsenic potentially present in soil at the project site from past agricultural use. organochlorine pesticides were not detected above the laboratory reporting limits in the soil samples collected and analyzed at the project site (Appendix F).

Arsenic was detected in all soil samples collected and analyzed at concentrations ranging from 6.4 to 10 milligrams per kilogram (mg/kg), which exceed the July 2025 San Francisco Bay Regional Water Quality Control Board Environmental Screening Level[2] for residential shallow soil exposure of 0.032 mg/kg. However, 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 sites throughout southern California, arsenic soil concentrations in soils averaged 12 mg/kg. As such, DTSC states that the appropriate threshold limit for arsenic concentration is 12 mg/kg (DTSC 2020). The detected concentrations of arsenic in project site soils are below the 12 mg/kg threshold limit. Therefore, the Phase I ESA concluded that on-site arsenic concentrations in soil represent background concentrations and are not indicative of elevated arsenic in project site soils. As a result, arsenic is not considered a contaminant of concern at the project site.

f. Airport Safety Hazards

The Santa Barbara Airport is located approximately 1.8 miles southeast of the project site. The Santa Barbara 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. The project site is located outside the Santa Barbara Airport's safety and noise contours delineated within the Santa Barbara Airport Land Use Plan (Santa Barbara County Association of Governments 2023). The project site is located within Review Area 2 of the Santa Barbara Airport's Airport Influence Area and the City's Airport Environs Overlay District. Review Area 2 consists of the overflight and airspace protection layer (Santa Barbara County Association of Governments 2023).

g. Wildland Fire

Wildlands are tracts of land in a natural state. Wildland fires are uncontrolled fires in wildland areas with extensive combustible fuel, including vegetation. In California, State and local agencies share responsibility for wildland fire prevention and suppression, and federal agencies take part as well. Federal agencies are responsible for oversight of federal lands in Federal Responsibility Areas. The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of statewide interest and have classified those lands as State Responsibility Areas

[1] A Recognized Environmental Condition means the presence or likely presence of any hazardous substances or petroleum projects within the project site due a release, likely release, past release, or material threat of future release to the environment (ASTM International Standard E1527-21).
[2] San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels are widely accepted and used by other regulatory agencies throughout the State.

(SRA). The California Department of Forestry and Fire Protection manages SRAs. All incorporated areas and unincorporated lands not in FRAs or SRAs are classified as Local Responsibility Areas. As described in Section 2.2, *Location and Existing Setting*, of Chapter 2, *Project Description,* in 2025, the California Department of Forestry and Fire Protection (CAL FIRE) designated the project site in the Local Responsibility Area primarily as a Very High Fire Hazard Severity Zone, with the southeastern portion of the project site designated as a High Fire Hazard Severity Zone (CAL FIRE 2025; Appendix G). This designation is based on several site-specific criteria as established by CAL FIRE and the Office of the State Fire Marshal, including the presence of flammable vegetation and slopes that can accelerate fire spread. The project site (along with most of the city of Goleta) is also subject to strong downslope winds, including Sundowner winds, which are known to intensify and rapidly spread wildfires. Additionally, the project site lies within the wildland-urban interface, where development meets natural vegetation, increasing the risk of structure ignition.

4.7.2 Regulatory Setting

a. Federal Regulations

Occupational Safety and Health Act Standard 1917.156

Created by the Occupational Safety and Health Act of 1970 (Code of Federal Regulations [CFR] Title 29), the 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. Standard 1917.156 designates fueling locations, regulates liquid fuel, and specifies standards for fueling operation and storage.

Hazardous Materials Transportation Act

The United States Department of Transportation, in conjunction with USEPA, is responsible for enforcement and implementation of federal laws and regulations pertaining to transportation of hazardous materials. The Hazardous Materials Transportation Act of 1974 (49 United States Code 5101) directs the United States Department of Transportation to establish criteria and regulations regarding the safe storage and transportation of hazardous materials. 49 CFR Parts 171 to 180 define the types of material classified as hazardous, regulate the transportation of hazardous materials, and specify the marking of vehicles transporting hazardous materials. 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.

Comprehensive Environmental Response, Compensation, and Liability Act and Superfund Amendments and Reauthorization 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 provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants.

In 1986, the Superfund Amendments and Reauthorization Act (SARA) amended CERCLA, reflecting the USEPA's experience in administering the Superfund program over six years. SARA provided new enforcement authorities and tools, increased the amount of funds available for hazardous waste site cleanups, and increased the awareness of human health problems affiliated with hazardous waste sites. SARA also revised the USEPA's Hazard Ranking System to accurately assess the risk posed to human health and the environment by uncontrolled hazardous waste sites.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 established a program administered and enforced by USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA gives USEPA the authority to regulate hazardous waste from "cradle to grave," meaning anyone involved in the lifecycle of hazardous waste, from creation to disposal, must comply with RCRA regulations.

Hazardous and Solid Waste Amendments Act

The Hazardous and Solid Waste Amendments Act amended RCRA by extending the "cradle to grave" system of regulating hazardous wastes and specifically prohibited the use of certain techniques for the disposal of some hazardous wastes. The Hazardous and Solid Waste Amendments Act includes more than 70 provisions, including the establishment of permitting deadlines for hazardous waste facilities, the regulation of small-quantity generators of hazardous waste, and the formation of RCRA Corrective Action requirements, which assist hazardous waste facilities in investigating and cleaning up any release of hazardous waste.

Toxic Substances Control Act

Congress enacted the Toxic Substances Control Act (TSCA) of 1976, codified in CFR Title 40, to give USEPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. USEPA repeatedly screens these chemicals and can require reporting or testing of those that may pose an environmental or human-health hazard. USEPA can ban the manufacture and import of those chemicals that pose an unreasonable risk. More specifically, in California, PCBs are regulated by both State (Title 22 of the California Code of Regulations [CCR]) and federal (TSCA) rules. TSCA has banned the manufacture, processing, use, and distribution in commerce of PCBs. TSCA gives USEPA the authority to develop, implement, and enforce regulations concerning the use, manufacture, cleanup, and disposal of PCBs. TSCA also establishes USEPA's Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act was created under SARA Title III to help communities protect public health and safety from chemical hazards. The national legislation requires each state to appoint a State Emergency Response Commission, which then divides each state into Emergency Planning Districts and nominates a Local Emergency Planning Committee for each district. The Emergency Planning and Community Right-to-Know Act provides compliance and reporting standards as well as waste, chemical, and cleanup enforcement, allowing each district to plan and prepare thoroughly should a hazardous waste accident or release arise.

Asbestos National Emission Standards for Hazardous Air Pollutants

The Asbestos National Emission Standards for Hazardous Air Pollutants are regulations established by USEPA under the Clean Air Act to minimize the release of asbestos fibers during activities involving the handling of asbestos. The Clean Air Act requires a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all ACMs, wetting all regulated ACMs, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expediently as practicable (USEPA 2025h). In Goleta, the Asbestos National Emission Standards for Hazardous Air Pollutants are enforced by the Santa Barbara County Air Pollution Control District (SBCAPCD).

Clean Water Act Section 402

Section 402 of the Clean Water Act establishes the National Pollutant Discharge Elimination System (NPDES) regulations for stormwater and other pollutant discharges. Section 402 prohibits discharge of pollutants to waters of the United States unless they are regulated by an NPDES permit. Stormwater discharges are regulated under a variety of NPDES permits, including municipal, agricultural, industrial, construction, and low-threat discharge permits.

In 1987, Congress amended the Clean Water Act to require the implementation of a two-phased program to address stormwater discharges. Phase I of the NPDES program, promulgated by the USEPA in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4s)[3] serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and 10 categories of industrial activities.

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, to further improve stormwater quality, USEPA promulgated the NPDES Phase II program in January 2000, which requires NPDES permits for stormwater discharges from regulated small MS4s and for construction sites disturbing between one and five acres of land.

In California, the NPDES program is administered by the State Water Resources Control Board through the nine Regional Water Quality Control Boards. The requirements of certain permits issued under NPDES program can minimize the potential for hazardous materials to adversely affect water quality. For example, the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction Stormwater General Permit) requires preparation of a Stormwater Pollution Prevention Plan for construction sites at least one acre in size that must include requirements for hazardous materials to be properly stored, contained, and disposed of to prevent polluted stormwater discharged from construction sites.

American Association of Radon Scientists and Technologists and American National Standards Institute Radon Standards for Single-Family Residences

The American Association of Radon Scientists and Technologists and American National Standards Institute implement a guidebook, *Reducing Radon in New Construction of 1 & 2 Family Dwellings and Townhomes*, which establishes minimum requirements for radon control in new single-family residential construction. This guidebook includes guidelines for design of residences to minimize radon exposure and verification that radon levels are below the national action level (4 pCi/L).

[3] 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.

b. State Regulations

Hazardous Waste Control Law

DTSC, a department of CalEPA, 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 Section 25100, et seq.) to regulate hazardous wastes. The Hazardous Waste Control Law lists chemicals and 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.

California Government Code Section 65962.5

California Government Code Section 65962.5 requires DTSC, the California Department of Health Services, SWRCB, and the California Department of Resources, Recycling, and Recovery 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 is considered a hazardous waste if it exceeds specific criteria in CCR Title 22. 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 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.

Environmental Health Standards for the Management of Hazardous Waste Law

Title 22 CCR Division 4.5, Chapter 11, Sections 66261.20 through 66261.24 contain technical descriptions of characteristics that would classify waste material, including soil, as hazardous waste. Specifically, waste is considered hazardous if it is toxic, ignitable, corrosive, or reactive pursuant to the criteria established in Title 22 CCR Division 4.5, Chapter 11, Article 3. When excavated, soils with concentrations of contaminants higher than certain acceptable levels must be handled and disposed of as hazardous waste. When demolished, structural features containing LBP can also be considered hazardous waste, depending on concentrations, and must be handled and disposed of as hazardous waste.

California Code of Regulations, Title 8, Section 1532.1

Because of its toxic properties, lead is regulated as a hazardous material as well as a toxic air contaminant. State-certified contractors must perform inspection, testing, and removal (abatement) of lead-containing building materials in compliance with applicable health and safety and hazardous materials regulations. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring, and compliance to ensure the safety of construction workers

exposed to lead-based materials. The California Division of Occupational Safety and Health's (Cal/OSHA) Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when LBP would be disturbed during construction. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities.

California Code of Regulations Title 8, Section 1735

Title 8, Section 1735 of the California Code of Regulations, mandates that properties be inspected for hazardous materials prior to starting demolition. In accordance with these regulations, utilities must be safely shut off and capped prior to the start of demolition.

California Code of Regulations, Title 14, Division 1.5

CCR Title 14, Division 1.5 provides fire safe regulations related to emergency access, address signage, and water standards. These regulations establish minimum wildfire protection standards for construction and development within the SRA and Very High Fire Hazard Severity Zone. The standards include basic emergency access and perimeter wildfire protection measures, signage and building numbering, water supply resources for emergency fire use, and vegetation modification. They also include a minimum setback of 30 feet for all buildings from property lines and/or the center of a road and provide defensible space requirements for areas within 30 feet of a structure (Zone 1) and between 30 and 100 feet from a structure (Zone 2).

California Code of Regulations, Title 17

CCR Title 17, Section 36100 mandates that individuals conducting lead abatement must notify the California Department of Public Health (CDPH) by completing and submitting the form at least five days prior to starting the abatement work.

California Public Resources Code

The California Public Resource Code (PRC) includes fire safety regulations for forest, range, and forage lands 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:

- On days when a burning permit is required, flammable materials shall be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and fire suppression equipment shall be available in the immediate area (PRC Section 4427)
- During the highest fire danger period from April 1 to December 1, no person except for an emergency crew member or those under or contracted with a publicly or privately-owned utility shall use tools powered by an internal combustion engine in any industrial operation located on or near any forest, brush, or grass-covered land, and appropriate fire suppression equipment shall be made immediately available (PRC Section 4428)
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines shall not be used within 25 feet of any flammable materials (PRC Section 4431)

- 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)

Senate Bill 63

Senate Bill 63 amended California Government Code Section 51178 to require the State Fire Marshal to identify areas of moderate, high, and very high fire hazard zone severity within Local Responsibility Areas based on similar factors used to map fire hazards within SRAs.

California Fire Code

The California Fire Code (CFC) is Chapter 9 of CCR Title 24 and is based on the International Fire Code. The CFC 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. The CFC uses 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 CFC employs a permit system based on hazard classification.

More specifically, CFC Chapter 8 addresses fire-related interior finishes; Chapter 9 addresses fire protection systems; and Chapter 10 addresses fire-related means of egress. CFC Chapter 49 also contains regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings in Fire Hazard Severity Zones in SRAs, Local Responsibility Areas, and wildland-urban interface fire areas.

CFC Section 3312 requires use of a water supply system for fire protection prior to combustible materials arriving at a project site. In addition, CFC Section 3312 establishes fire watch protocols during construction and demolition.

California Building Code: Wildland-Urban Interface Building Standards

On September 20, 2007, the California Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending CCR, Title 24, Part 2, known as the California Building Code, to include wildland-urban interface standards. The provisions of the California Building 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. The wildland-urban interface standards include provisions for ignition-resistant construction standards in the wildland-urban interface and use a hazard classification system to determine what protective measures are required to ensure fire safety and protect lives. Specifically, California Building Code Chapter 7A addresses materials and construction methods for exterior wildfire exposure.

c. Local Regulations

Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan

The Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan contains goals and objectives that are intended to reduce loss of life and property from natural disasters. The Plan was comprehensively updated in 2022, and the City is a participating agency. During the planning process,

this plan used Federal Emergency Management Agency tools to determine the most likely possible threats would be wildfire, earthquakes, drought and water shortage, pandemic/public health emergency, energy shortage and resiliency, extreme heat and freeze, and flooding. The Plan identifies mitigation action items that aim to meet objectives and reduce the impacts of these hazards. The Santa Barbara County Office of Emergency Management leads the responsibility for overseeing plan implementation and maintenance strategy. Plan implementation and evaluation is a shared responsibility among all planning partnership members and agencies identified as lead agencies in the mitigation action plans (County of Santa Barbara 2023).

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. The Santa Barbara County ALUP is the fundamental tool used by the Santa Barbara County Association of Governments, 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. The proposed project does not require mandatory ALUC review because the project site is located outside of the noise and safety contours identified within the Santa Barbara County ALUP. Because the proposed project includes residential uses, an overflight notification (as outlined in Section 3.5.3 of the 2023 Santa Barbara County ALUP) must be recorded which provides notice to potential homebuyers of aircraft activity within the vicinity of the residence.

City of Goleta General Plan/Coastal Land Use Plan

The City of Goleta General Plan/Coastal Land Use Plan Safety Element outlines several goals and policies related to hazards and hazardous materials. Goals and polices relevant to the project include:

- **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.
- **SE 1.9: Reduction of Radon Hazards.** The City shall require the consideration of radon hazards for all new construction and require testing of radon levels for construction of homes and buildings located in areas subject to moderate or high potential for radon gas levels exceeding 4.0 picocuries as shown on maps produced by the California Division of Mines and Geology. The City shall require new homes to use radon-resistant construction where needed based on U.S. Environmental Protection Agency guidelines.
- **SE 7.1: Fire Prevention and Response Measures for New Development.** New development and redevelopment projects shall be designed and constructed in accordance with National Fire Protection Association standards to minimize fire hazards, with special attention given to fuel management and improved access in areas with higher fire risk, with access or water supply deficiencies, or beyond a 5-minute response time.

- **SE 7.2: Review of New Development.** Applications for new or expanded development shall be reviewed by appropriate Santa Barbara County Fire Department personnel to ensure they are designed in a manner that reduces the risk of loss due to fire. Such review shall include consideration of the adequacy of "defensible space" around structures at risk; access for fire suppression equipment, water supplies, construction standards; and vegetation clearance. Secondary access may be required and shall be considered on a case-by-case basis. The City shall encourage built-in fire suppression systems such as sprinklers, particularly in high-risk or high-value areas.
- **SE 7.4: Fuel Modification Plans.** Applications for new development that require fuel modification shall include a Fuel Modification Plan for the project. This plan shall be prepared by a landscape architect or resource specialist and shall include measures to minimize removal of native vegetation, minimize disturbance to environmentally sensitive habitat areas (ESHAs), and incorporate fire-retardant vegetation in new plantings. Such plans shall be reviewed and approved by the Santa Barbara County Fire Department.
- **SE 7.6: Standards for Rebuilding in High Fire Hazard Areas.** Any rebuilding in high fire hazard areas shall incorporate development standards and precautions that reduce the chance of structure losses from fire.
- **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.

4.7.3 Impact Analysis

4.7.3.1 Methodology and Significance Thresholds

Methodology

Project impacts related to hazards and hazardous materials are evaluated based on the project's adherence to local, state, and federal standards; the nature of demolition, construction, and operational activities; proximity to schools; proximity of hazardous materials sites to the project; proximity to airports and adherence to applicable airport land use standards; compliance with existing emergency response plans; and proximity to wildland areas and potential for fire.

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on hazards and hazardous materials. Would the project:

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; or
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 2024 *Environmental Thresholds and Guidelines Manual* (refer to Chapter 4, *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.

4.7.3.2 Project Impacts and Mitigation Measures

Threshold 1:	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 AND OPERATION WOULD INVOLVE THE TRANSPORTATION, USE, AND DISPOSAL OF HAZARDOUS MATERIALS. HOWEVER, HAZARDOUS MATERIALS WOULD BE TYPICAL OF THOSE USED FOR CONSTRUCTION AND IN RESIDENTIAL DEVELOPMENTS. ALL HAZARDOUS MATERIALS WOULD BE TRANSPORTED, USED, AND DISPOSED OF IN COMPLIANCE WITH EXISTING FEDERAL, STATE, AND LOCAL REGULATIONS. PROPOSED PROJECT IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Construction

Project demolition and construction 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). The increased use of these hazardous materials has the potential to result in adverse effects in the event construction workers, the public, or the surrounding environment become exposed to these hazardous materials and associated health risks. Potential exposure could result from accidental spills or leaks during fueling or equipment maintenance, improper storage or handling of chemicals, or inadequate disposal of hazardous waste. Airborne exposure may also occur through dust inhalation or the release of fumes and vapors from volatile compounds. Soil and groundwater contamination could result from leaching or runoff, particularly during storm events. Additionally, risks to workers may be elevated if personal protective equipment is not used or if safety protocols are not followed, while public exposure could occur through unauthorized site access or the migration of contaminants beyond the construction zone.

Hazardous materials are commonly used at construction sites, and project construction activities would be required to comply with applicable federal and state regulations established by USEPA and the State of California. These include the Hazardous Material Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Materials Management Act, and CCR Title 22. Oversight by the appropriate federal, state, and local agencies and compliance by new

development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk associated with potential exposure of the public to these substances. These regulations require that only trained and certified individuals handle hazardous materials; enforce safety regulations for the transportation of hazardous materials via vehicle, aircraft, and rail; and set forth containment protocols and incident reporting procedures, among other requirements. Additionally, compliance with the Construction Stormwater General Permit (refer to Subsection 4.8.2, *Regulatory Setting,* of Section 4.8, *Hydrology and Water Quality*) requires implementation of Good Housekeeping Best Management Practices to reduce risk of spills or runoff from hazardous materials used during construction. During the Phase I ESA site reconnaissance, various containers of hazardous substances and petroleum products, including paint, gasoline, motor oil, and propane, were observed outside of the southernmost structure on the project site (Appendix F). Project construction would include removal of these existing hazardous materials and waste from the project site; such removal and disposal of on-site hazardous materials would be required to comply with applicable federal and state regulations noted above, 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, the project would not create a significant hazard to the public or the environment during construction. This impact would be less than significant.

Operation

Residential land use is not typically associated with the use, transportation, storage, or generation of substantial quantities of hazardous materials. Project operation would result in an incremental increase in the use of household hazardous materials, such as cleaning products. In addition, landscaping would include the use of fertilizers and pesticides on-site. The use of these materials could result in exposure of residents, visitors, and the public to hazardous materials and associated health risks. However, all hazardous material transport, use, or disposal associated with the proposed residences would be required to comply with existing hazardous materials regulations established by USEPA and the State of California. These regulations prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce the risk of spills.

With compliance with existing regulations governing transport, use, and disposal of hazardous materials, the proposed project would not create a significant hazard to the public or the environment during operation. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 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?

Impact HAZ-2 PROJECT DEMOLITION AND CONSTRUCTION COULD RESULT IN THE ACCIDENTAL RELEASE OF HAZARDOUS MATERIALS. HOWEVER, IMPLEMENTATION OF MITIGATION MEASURES HAZ-1 AND HAZ-2 WOULD REDUCE CONSTRUCTION PHASE IMPACTS TO CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*. PROJECT OPERATION WOULD REQUIRE MINIMAL HAZARDOUS MATERIAL USE, WHICH WOULD OCCUR IN ACCORDANCE WITH EXISTING FEDERAL, STATE, AND LOCAL REGULATIONS. OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Construction

Hazardous Materials in Existing Structures

As described in Section 4.7.1c, there is no evidence that PCB contamination exists on-site, and based on the age of the residence, garage, and barn on-site, there is limited potential for mercury to be located within these structures. Any potential sources of mercury (i.e., thermostats, gas pressure regulators, etc.) would be identified and removed prior to demolition in accordance with California Code of Regulations Title 8, Section 1735. Accordingly, the potential for hazards involving the release of mercury during demolition would be less than significant.

However, based on the age of the residence, garage, and barn on-site, there is potential for the structures to contain ACM and LBP. Considering the proposed project would involve the demolition of the residence, garage, and barn, proposed demolition activities have the potential to result in accidental release of ACM or LBP, which would create a potentially significant hazard to both construction workers and the environment.

In California, any facility known to contain ACMs is required to have a written asbestos management plan (also known as an Operations and Maintenance Program). SBCAPCD enforces the Asbestos National Emission Standards for Hazardous Air Pollutants, which regulates the control of asbestos during the renovation and demolition of buildings under the federal Clean Air Act. Additionally, Cal/OSHA Title 8, Section 1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers.

Similarly, the removal of LBP-containing materials would be subject to specific and detailed Cal/OSHA requirements to ensure proper containment, handling, notification, and monitoring, and removal would be performed by a licensed LBP abatement contractor. Cal/OSHA Title 8, Section 1532.1 requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed Cal/OSHA standards. Under this rule, construction workers may not be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over an eight-hour period, and exposure must be reduced to lower concentrations if the workday exceeds eight hours. Furthermore, as required by CCR Title 17, Section 36100, the project applicant would be required to submit Form 8551 to CDPH prior to performing lead hazard abatement, which would require information related to the structure, construction activities, and construction restrictions.

While the potential removal of ACMs and LBP from the residence, garage, and barn would be subject to applicable laws and regulations enforced by SBCAPCD, Cal/OSHA, and CDPH, construction activities would nevertheless have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of ACMs or LBP

into the environment if these materials are mishandled during demolition without proper monitoring from local agencies. This impact would be potentially significant.

Hazardous Materials in Soil, Soil Vapor, or Groundwater

Project construction would include grading and earth-moving activities that could potentially disturb hazardous materials in soils throughout the project site. Ground-disturbing activities generating fugitive dust would have the potential to result in the release of hazardous materials into the environment if not handled properly, which could create a significant hazard to the public and/or the environment. As discussed in Section 4.8, *Hydrology and Water Quality*, based on the depth to groundwater, groundwater would not be encountered during grading activities; therefore, there is no potential for the release of contaminated groundwater. The project site was not identified as having existing soil vapor contamination, based on vapor encroachment evaluations completed as part of the Phase I ESA (Appendix F). In addition, based on the results of the soil sampling completed as part of the Phase I ESA, ground-disturbing activities on the project site would not have the potential to expose construction workers or residents to risks associated with the release of organochlorine pesticides or arsenic. Impacts related to the release of hazardous materials in soil, soil vapor, and groundwater would be less than significant.

Operation

Radon

As described in Section 4.7.1c, the Radon Zone Map for Santa Barbara County produced by the Bureau of Mines and Geology indicates that the project site is in an area with high potential for indoor radon levels exceeding USEPA recommended level of 4.0 pCi/L (California Department of Conservation 2000). Accordingly, the release of radon could be a risk to residents. However, in accordance with City of Goleta General Plan/Coastal Land Use Plan Policy SE 1.9, the City requires testing of radon levels on the project site and implementation of radon-resistant design if radon levels on-site are in excess of the USEPA recommended level of 4.0 pCi/L. If on-site radon levels exceed the USEPA recommended threshold, as a Condition of Approval, the City would require the design of homes to comply with the standards for reducing radon in single-family residences implemented by the American Association of Radon Scientists and Technologists and American National Standards Institute. These standards include, but are not limited to, use of vents to remove radon from residences, use of gravel under the foundations of residences to minimize radon intrusion into residences, and mandated radon testing after implementation of radon-reducing design features but prior to occupancy. With adherence to these standards, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving radon release. This impact would be less than significant.

Hazardous Material Use

As stated in Impact HAZ-1, project operational activities would involve minimal transport, use, and disposal of hazardous materials used for routine maintenance. Small quantities of household hazardous materials and landscaping materials may be used on-site. However, the project's operational activities would be required to comply with applicable federal, state, and local regulations, which prescribe measures to reduce the risk of accidental spills. In addition, the Phase I ESA did not identify hazards on-site that could pose a risk to residents during operation of the proposed project. Therefore, project operation would not create a significant hazard to the public or

the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, and this impact would be less than significant.

Mitigation Measures

HAZ-1 Asbestos-Containing Materials Abatement

Prior to the issuance of Zoning Clearance associated with the demolition permit, the project applicant shall prepare an asbestos abatement plan addressing the items/topics listed below. The asbestos abatement plan shall be reviewed and approved by SBCAPCD. Proof of SBCAPCD approval shall be provided to the City of Goleta's 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, which 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 SBCAPCD ten working days prior to starting demolition as part of the Notification for Renovation and Demolition Form ENF-28 submittal. 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 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 high efficiency particulate air 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 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 of 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.
- 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.

- 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, obtain SBCAPCD's approval, and contract with an abatement contractor prior to the issuance of Zoning Clearance associated with the demolition permit.

Monitoring. The City of Goleta's Director of Planning and Environmental Review, or designee, shall verify SBCAPCD has approved the asbestos abatement plan prior to the issuance of Zoning Clearance. The City of Goleta's Director of Planning and Environmental Review, or designee, shall spot-check compliance with the asbestos abatement plan during demolition activities and verify compliance documentation following the proposed project's demolition activities.

HAZ-2 Lead-Based Paint Abatement

Prior to the issuance of Zoning Clearance associated with the demolition permit, the project applicant shall prepare an LBP abatement plan. This plan can be combined with the plan required in Mitigation Measure HAZ-1. The LBP abatement plan shall be reviewed and approved by the City of Goleta's Planning and Environmental Review Director, or designee. Approval of the LBP abatement plan by the City of Goleta's Planning and Environmental Review Director, or designee, shall be based on the plan's demonstrated compliance with applicable federal, state, and local regulations, including California Department of Public Health and California Division of Occupational Safety and Health requirements. The plan shall clearly identify the use of certified abatement contractors, describe lead-safe work practices (e.g., containment, wet methods, dust suppression), and outline procedures for waste segregation, characterization, and disposal in accordance with hazardous waste thresholds. The plan shall also include site-specific measures to prevent off-site migration of lead dust or debris, and provide documentation of California Department of Public Health notification and contractor qualifications

During proposed project construction and demolition activities, the project applicant shall follow the measures outlined in the LBP abatement plan. 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's Planning and Environmental Review Director. Prior to abatement, the applicant shall notify California Department of Public Health of lead-based abatement activities through submittal of California Department of Public Health Form 8551, and provide evidence of the notification to the City of Goleta's Planning and Environmental Review Director or designee. Project-specific requirements of the LBP abatement 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.
- Pursuant to California Code of Regulations Title 22, Section 66261.24(a)(2)(A), 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 LBP abatement plan, notify the California Department of Public Health, and contract with an abatement contractor prior to the issuance of Zoning Clearance associated with the demolition permit.

Monitoring. The City of Goleta's Director of Planning and Environmental Review, or designee, shall approve the LBP abatement plan and verify the California Department of Public Health has been notified prior to the issuance of Zoning Clearance. The City of Goleta's Director of Planning and Environmental Review, or designee, shall check the abatement contractor's monitoring log to ensure project-specific recommendations are enacted during proposed project demolition activities.

Significance After Mitigation

Implementation of Mitigation Measures HAZ-1 and HAZ-2 would reduce potential hazardous material impacts associated with accidental releases of hazardous materials during demolition of the existing residence, garage, and barn to a less-than-significant level. Operational impacts would be less than significant without mitigation.

Threshold 3:	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 PROJECT CONSTRUCTION WOULD INVOLVE THE HANDLING OF HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN 0.25 MILE OF A SCHOOL. FOLLOWING THE IMPLEMENTATION OF MITIGATION MEASURES HAZ-1 AND HAZ-2, CONSTRUCTION IMPACTS WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*. PROJECT OPERATIONS WOULD REQUIRE MINIMAL HAZARDOUS MATERIAL USE WITHIN 0.25 MILE OF A SCHOOL WHICH WOULD OCCUR IN ACCORDANCE WITH EXISTING FEDERAL, STATE, AND LOCAL REGULATIONS. OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The nearest school to the project site is South Coast Montessori, which is located approximately 0.2 mile south of the project site. During construction, equipment would require the use of diesel fuel, gasoline, motor oil, and similar materials. The amount of fuel and oil to power construction equipment would be typical of similar construction projects (e.g., 10,000 to 25,000 gallons of fuel[4]). Such materials would be handled and disposed of in accordance with applicable regulations including OSHA Standard 1917.156, which designates fueling locations, regulates liquid fuel, and specifies standards for fueling operation and storage. Construction personnel would be required to have the necessary training and/or certifications to operate construction equipment, minimizing the risk of accidental release of hazardous materials due to equipment failure. However, as discussed under Impact HAZ-2, construction activities would have the potential to create a significant hazard involving the release of ACMs or LBP into the environment. Therefore, proposed project construction would

[4] Estimated fuel consumption is based on typical usage rates for medium-scale construction projects and can be modeled using United States Environmental Protection Agency tools such as the Diesel Emissions Quantifier or Motor Vehicle Emission Simulator, which account for equipment type, operating hours, and project duration.

potentially involve the handling of hazardous materials within 0.25-mile of South Coast Montessori. As such, construction related impacts would be potentially significant.

As discussed under Impact HAZ-1, residential land use is not typically associated with the use, transportation, storage, or generation of substantial quantities of hazardous materials. Project operation would result in an incremental increase in the use of household hazardous materials, such as cleaning products. In addition, landscaping would include the use of fertilizers and pesticides on-site. Pesticide use would occur in accordance with existing hazardous materials regulations established by USEPA, 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 the risk of spills. With adherence to existing regulatory requirements, proposed project operation would not pose a significant hazard to existing or proposed schools within 0.25-mile of the project site due to the handling of hazardous or acutely hazardous materials, substances, or waste. As such, operational impact would be less than significant.

Mitigation Measures

Mitigation Measures HAZ-1 and HAZ-2, described in Impact HAZ-2, would be required.

Significance After Mitigation

Implementation of Mitigation Measures HAZ-1 and HAZ-2 would reduce potential hazardous material impacts associated with the handling of hazardous materials within 0.25-mile of an existing or proposed school during construction to a less-than-significant level. Operational impacts would be less than significant without mitigation.

Threshold 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?

Impact HAZ-4 **THE PROPOSED PROJECT WOULD NOT BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT. NO IMPACT WOULD OCCUR.**

Government Code Section 65962.5 requires CalEPA to maintain an updated Hazardous Waste and Substances Sites List, also known as the Cortese List. 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.

Based on review of these databases, described in the *Known Hazardous Materials Sites* discussion in Section 4.7.1, *Setting*, there are no 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 hazardous materials sites. Therefore, no impact would occur.

Mitigation Measures

No mitigation is 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, result in a safety hazard or excessive noise for people residing or working in the project area?

Impact HAZ-5 THE PROJECT SITE IS LOCATED OUTSIDE OF THE SAFETY CONTOURS FOR THE SANTA BARBARA AIRPORT. THE PROPOSED PROJECT WOULD NOT RESULT IN A SAFETY HAZARD OR EXCESSIVE NOISE RELATED TO AIRPORT OPERATIONS FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA. NO IMPACT WOULD OCCUR.

The project site is also not located within the vicinity of a private airstrip. The airport nearest to the project site, the Santa Barbara Airport, is located approximately 1.8 miles southeast of the project site. The project site is located outside of the safety and noise contours established within the Santa Barbara Airport Land Use Plan (Santa Barbara County Association of Governments 2023). Accordingly, the proposed project would not result in a safety hazard or excessive noise related to airport operations for people residing or working in the project area. No impact would occur.

Mitigation Measures

No mitigation is required.

Threshold 6:	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-6 CONSTRUCTION IN CATHEDRAL OAKS ROAD COULD POTENTIALLY DELAY EMERGENCY RESPONSE. IMPLEMENTATION OF A CONSTRUCTION TRAFFIC MANAGEMENT PLAN WOULD REDUCE THE POTENTIAL FOR CONSTRUCTION TO RESULT IN SUBSTANTIAL DISRUPTION TO EVACUATION ON CATHEDRAL OAKS ROAD DURING CONSTRUCTION. PROPOSED PROJECT OPERATION WOULD NOT RESULT IN IMPAIRMENT OR INTERFERENCE WITH EMERGENCY RESPONSE OR EVACUATION PLANS. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT.*

The City of Goleta, in cooperation with Federal Emergency Management Agency, 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 Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan identifies Cathedral Oaks Road as an evacuation route (County of Santa Barbara 2023). Construction staging and parking would occur on the project site and therefore would not impair implementation of the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan. The proposed utility installation underlying Cathedral Oaks Road would require encroachment into the right-of-way and temporary lane closures on Cathedral Oaks Road during this phase of construction. However, in accordance with Chapter 12.02 of the City's Municipal Code, the project applicant would be required to maintain at least one safe crossing for vehicles and must implement measures to minimize disruption to existing traffic conditions. For the proposed project, implementation would involve preparation and City approval of a Traffic Control Plan that ensures at least one travel lane remains open at all times, with flaggers or temporary signals used to alternate traffic flow as needed. The Traffic Control Plan would also include advance signage, detour routes, and work-hour restrictions to reduce peak-hour congestion. Coordination with emergency service providers would be required to ensure continuous access for fire, police, and medical responders. The City's standard requirement to maintain at least one open lane and

coordinate with emergency responders ensures that fire trucks, ambulances, and law enforcement vehicles could still travel along Cathedral Oaks Road during project construction.

In addition, as described further in Section 4.11, *Transportation and Circulation*, the project applicant's construction contractor would be required to implement a Construction Traffic Management Plan during construction within Cathedral Oaks Road. The Construction Traffic Management Plan would require implementation of traffic control measures and minimization of disruptions to access points at the project site for emergency service vehicles during construction on Cathedral Oaks Road, which would be reviewed for potential safety concerns and approved by the Santa Barbara County Fire Department. Examples of measures that would be implemented include scheduling lane closures during off-peak hours and coordinating with emergency service providers to maintain access; stationing trained flaggers at both ends of the construction zone to direct traffic and prioritize emergency vehicles; including a 24-hour emergency contact list and protocols for immediate coordination with emergency responders; and using high-visibility signage and advance public notifications to alert drivers and emergency services to construction activities. With implementation of the Construction Traffic Management Plan, proposed construction within Cathedral Oaks Road would not result in interference with emergency response or evacuation.

Proposed project operations would not involve closures on Cathedral Oaks Road nor introduce activities that could impede or interfere with the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan or emergency evacuations on Cathedral Oaks Road. Furthermore, as discussed in detail in Section 4.14, *Wildfire*, the proposed project would not generate substantial additional vehicles utilizing Cathedral Oaks Road and therefore would not result in substantial interference with emergency evacuation procedures on Cathedral Oaks Road. Therefore, proposed project 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 is required.

Threshold 7:	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 WITHIN A HIGH AND VERY HIGH FIRE HAZARD SEVERITY ZONE. HOWEVER, THE PROPOSED PROJECT WOULD NOT EXPOSE PEOPLE OR STRUCTURES, EITHER DIRECTLY OR INDIRECTLY, TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES. CONSTRUCTION AND OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

As stated in Section 4.7.1, *Setting*, CAL FIRE designated the project site in the Local Responsibility Area primarily as a Very High Fire Hazard Severity Zone, with the southeastern portion of the project site designated as a High Fire Hazard Severity Zone (CAL FIRE 2025; Appendix G). This designation is based on several site-specific criteria as established by CAL FIRE and the Office of the State Fire Marshal, including the presence of flammable vegetation and slopes that can accelerate fire spread. The project site (along with most of the city of Goleta) is also subject to strong downslope winds, including Sundowner winds, which are known to intensify and rapidly spread wildfires. Additionally, the project site lies within the wildland-urban interface, where development meets natural vegetation, increasing the risk of structure ignition.

During construction, there would be a temporary increase in human activity and potential ignition sources, including equipment that could create sparks, be a source of heat, or leak flammable materials on the project site. Ignition sources include internal combustion engines, welding or cutting tools, generators, and fuel storage areas. In a Very High Fire Hazard Severity Zone, such activities elevate the risk of wildfire ignition, particularly during hot, dry, and windy conditions. If not properly managed, a small spark or fuel spill could ignite surrounding vegetation, leading to rapid fire spread due to the project site's flammable vegetation, sloped terrain, and exposure to Sundowner winds. This risk is compounded by the proximity of the project site to the wildland-urban interface, where fire could threaten nearby structures and infrastructure.

In accordance with PRC Section 4442, equipment including earth-moving and portable construction equipment with internal combustion engines would be equipped with spark arrestors to prevent the emission of flammable debris from exhaust, when operating on any forest-covered, brush-covered, or grass-covered land. In addition, PRC Sections 4427 and 4431 specify standards for conducting construction activities on days when a burning permit is required, and PRC Section 4428 requires construction contractors to maintain fire suppression equipment during the highest fire danger period (April 1 to December 1) when operating on or near any forest-covered, brush-covered, or grass-covered land. In addition, compliance with CFC Section 3312 would require use of a water supply system for fire protection prior to combustible materials arriving at the project site. These measures are designed to prevent accidental ignition and facilitate rapid response in the event of a fire. Adherence to these regulatory requirements would minimize the risk of potential wildland fire during construction.

Proposed project design would be subject to the following fire safety standards:

- The CFC, which include safety measures to minimize the threat of fire, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system and sealing any gaps around doors, windows, eaves and vents to prevent intrusion by flame or embers, automatic interior and exterior fire sprinklers, a robust water delivery system, fire apparatus access, and defensible space.
- Chapter 9, Fire Protection Systems, of the California Building Code, which addresses fire suppression and detection systems and is applicable to all development.
- Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure, of the California Building Code, which governs materials and construction methods for exterior wildfire exposure and is applicable to structures within Very High Fire Hazard Severity Zones.
- CCR Title 14, which sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. CCR Title 14 is appliable to development in State Responsibility Areas and Very High Fire Hazard Severity Zones.

Undergrounding of the proposed utility lines on-site would minimize the risk of fire from utilities. Furthermore, project operation would not introduce new activities that could substantially increase the risk of wildfires, as operation of the proposed project involves residential uses which do not pose a substantial fire risk. Residences would be designed in accordance with California Building Code standards for roof coverings, vents, residential sprinklers, ignition-resistant construction materials, decking, and exterior windows, skylights, and doors which would minimize fire risk. Landscaping on-site would include fire-resistant plants strategically placed to resist spread of fire to nearby homes and hardscaping on-site would use limited combustible materials, including non-combustible fencing, in or near structures. These design features are consistent with the requirements of Chapter 7A of

the California Building Code and CCR Title 14, which are specifically intended to reduce wildfire ignition and structure loss in VHFHSZs. For example, ignition-resistant construction materials and ember-resistant vents reduce the likelihood of structure ignition from wind-driven embers, which are a primary cause of home loss in wildfires. Residential sprinkler systems provide immediate suppression capability in the event of ember intrusion or radiant heat exposure. Fire-resistant landscaping and non-combustible fencing reduce the potential for fire to spread from vegetation to structures. By incorporating these features into the proposed project's design, the risk of wildfire ignition and structure loss is substantially reduced even under VHFHSZ conditions.

Construction activities may require temporary lane closures on Cathedral Oaks Road to complete frontage improvements and utility work, resulting in temporary disruptions to vehicular and multi-modal circulation in the area. However, as described in Section 4.11, *Transportation and Circulation*, the project applicant would be required to maintain at least one safe crossing for vehicles and must implement measures to minimize disruption to existing traffic conditions. To ensure compliance with the City's Municipal Code, as a Condition of Approval, the project applicant's construction contractor would be required to prepare and implement a Construction Traffic Management Plan, which must specify transportation measures to be implemented during construction on Cathedral Oaks Road to ensure disruptions to circulation and minimized, including in the event of emergency evacuation. Examples of transportation measures that would be implemented include scheduling lane closures during off-peak hours and coordinating with emergency service providers to maintain access; stationing trained flaggers at both ends of the construction zone to direct traffic and prioritize emergency vehicles; including a 24-hour emergency contact list and protocols for immediate coordination with emergency responders; and using high-visibility signage and advance public notifications to alert drivers and emergency services to construction activities. With implementation of these transportation measures, the proposed project would maintain adequate emergency access in accordance with City standards. As discussed in detail in Section 4.14, *Wildfire*, the proposed project would not generate substantial additional vehicles utilizing Cathedral Oaks Road and therefore would not result in substantial interference with emergency evacuation procedures on Cathedral Oaks Road.

With adherence to regulatory requirements, the proposed project's potential to expose people or structures to significant risk of loss, injury, or death involving wildland fires would be less than significant.

Refer to Section 4.14, *Wildfire*, for further discussion of wildfire impacts.

Mitigation Measures

No mitigation is required.

4.7.4 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 cumulative hazardous materials impacts is the project site and immediately surrounding parcels. This scope is appropriate only when supported by the nature of the materials used, the scale of construction, and the potential for off-site transport or exposure. In this case, the project involves the use of common construction-related hazardous materials (e.g., fuels, solvents, paints) that are typically stored and used in limited quantities and under controlled conditions. These materials are not expected to migrate beyond the project site under normal operating conditions. Additionally, regulatory compliance with hazardous materials handling, storage, and disposal requirements further limits the potential for off-site impacts. While accidental releases could theoretically affect adjacent

parcels, the likelihood and extent of such impacts are constrained by the temporary nature of construction activities, the implementation of best management practices, and the relatively small volume of hazardous materials involved. Therefore, the project site and immediately surrounding parcels represent a reasonable geographic scope for evaluating potential cumulative hazardous materials impacts.

Cumulative development includes the Annual Pavement Rehabilitation Project and Pavement Management Program and the Glen Annie Golf Course Residential Development from Table 3-1 in Chapter 3, *Related Projects*, within the geographic scope. 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 would be addressed prior to permit approval. The proposed project would have no impact related to being on a site included on a list compiled pursuant to Government Code Section 65962.5 or airport hazards; therefore, a discussion of cumulative impacts related to airport hazards is not provided herein.

Cumulative projects proposed in the geographic scope would have the potential to expose future area residents, employees, and visitors to hazards by developing 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 soil and/or 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. Hazardous materials regulations are designed to prevent, contain, and remediate hazardous materials incidents at both the project and regional scale. These regulations require site-specific hazardous materials business plans, emergency response protocols, and proper training and certification for handlers and transporters. When applied cumulatively across multiple developments, these regulatory frameworks create a consistent and enforceable system that minimizes the potential for overlapping or compounding hazardous materials risks. Cumulative impacts related to the creation of a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials; accidental release of hazardous materials; handling of hazardous materials within 0.25 mile of a school; or location of an existing hazardous material site would therefore be less than significant.

All cumulative projects would be required to adhere to the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan, which includes comprehensive actions for emergency response and evacuation, ensuring that all projects within Santa Barbara County adhere to established protocols. The Multi-Jurisdictional Hazard Mitigation Plan includes coordinated emergency response strategies, evacuation route planning, and interagency communication protocols that are implemented at the project level through conditions of approval, construction traffic management plans, and fire department oversight. Each cumulative project must demonstrate that emergency vehicle access is maintained during construction and that evacuation routes remain unobstructed, even under temporary traffic control. These requirements are enforced through project-specific review by the Santa Barbara County Fire Department and other emergency service providers. Past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1, would not impair implementation of or physically interfere with evacuation plans, as projects would be required to maintain clear access routes and ensure that construction activities do not obstruct evacuation routes. Therefore, cumulative impacts related to emergency response would be less than significant.

Cumulative projects listed within Table 3-1, including Glen Annie Golf Course Residential Development, Sandpiper Golf Course, Ellwood Mesa Vertical Access Project, Hazardous Fuel Reduction at Ellwood Mesa/Sperling Preserve Open Space, Ellwood Butterfly Habitat Management Plan Implementation, Ellwood Tree Safety Emergency Permit and Ellwood North Restoration, and the Coastal Trails and Habitat Restoration Project, are located within Fire Hazard Severity Zones designated by CAL FIRE (CAL FIRE 2025). Cumulative projects would involve construction over various periods of time and would therefore have the potential to cause wildfires through equipment that could create sparks, be a source of heat, or leak flammable materials on cumulative projects' sites. Accordingly, cumulative impacts related to wildland fire would be potentially significant.

Construction and operation of the proposed project would occur in compliance with applicable regulations, such as the California Public Resources Code, which would reduce the risk of wildfire during construction and operation. These regulations include, but are not limited to, PRC Sections 4290 and 4291, which establish defensible space requirements, emergency access standards, and vegetation management protocols. When applied cumulatively to individual project sites, these regulations ensure that ignition sources are minimized, emergency response access is maintained, and vegetation is managed to reduce fuel loads. The proposed project would underground utility lines on-site to minimize the risk of fire from utilities. Operation of the proposed project would not introduce new activities that could substantially increase the risk of wildland fire. In addition, operation of the proposed project would not induce substantial vehicle use such that emergency evacuation on Cathedral Oaks could be impeded in the event of a wildland fire. Therefore, the proposed project's contribution to cumulative impacts related to the risk of loss, injury, or death involving wildland fire would not be considerable.

4.8 Hydrology and Water Quality

This section analyzes the proposed project's potential impacts to hydrology and water quality, including the potential to impair water quality, decrease groundwater supplies or interfere with groundwater recharge, 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 *Conceptual Hydrology and Hydraulic Study* (Appendix H), the *Stormwater Control Plan* (Appendix I), and the *Preliminary Geotechnical Report* (Appendix E) prepared for the proposed project.

4.8.1 Setting

4.8.1.1 Watersheds and Surface Waters

The project site is located within the Jalama Creek-Frontal Santa Barbara Channel watershed which covers approximately 42.8 square miles in southern Santa Barbara County (California Department of Transportation 2025). 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 Hydrology Unit and the Goleta hydrologic Sub-Area (California Department of Transportation 2025).

El Encanto Creek is located adjacent to the west of the project site and flows north-south from the foothills north of the project site to the Devereaux Slough to the south, adjacent to the community of Isla Vista (Central Coast RWQCB 2025). The State Water Resources Control Board (SWRCB) has listed El Encanto Creek as impaired by turbidity, *Escherichia coli* (E. coli), nitrate, dissolved oxygen, and imbalanced pH levels (SWRCB 2025).

4.8.1.2 Hydrology and Drainage

Under existing conditions, the project site primarily slopes north to south, with moderate sloping on the western end of the project site toward El Encanto Creek. The project site is primarily drained by surface flow for eventual discharge to the Devereaux Slough and Pacific Ocean. Under existing conditions, the eastern half of the project site drains south towards Cathedral Oaks Road and the western half of the project site drains southwest toward El Encanto Creek. Project site soils are classified within Hydrologic Soil Group D which have low infiltration rates, high runoff potential when wet, and typically contain greater than 40 percent clay (United States Department of Agriculture-Natural Resources Conservation Service 2009).

4.8.1.3 Groundwater

The Goleta Groundwater Basin (Basin) underlies the majority of the project site, excluding the northernmost portion of the project site which does not overlie a designated groundwater basin (Goleta Water District [GWD] 2023). The Basin is 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 West subbasin boundary historically mapped by GWD differs from the mapping prepared by DWR along the northern, western, and southern reaches. Generally, the West subbasin is bounded by the Santa Barbara Airport to the east, the foothills to the north, Bell Canyon to the west, and the More Ranch Fault to the south (GWD 2023). Natural recharge of the Basin occurs from infiltration of precipitation, seepage from streams, and subsurface inflow from consolidated rocks (DWR 2004; GWD 2023).

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 short of demand by the 1970s. In 1973 a group of landowners filed a lawsuit for the adjudication of water rights in the Basin. The North and Central subbasins were adjudicated through a Santa Barbara Superior Court case [*Wright v. Goleta Water Dist.* (1985) 174 Cal. App.3d 74]. 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 from the Basin in addition to the right to surplus waters, injected water, return flows, and rights transferred from private pumpers. The West subbasin is partially adjudicated but considered separate from the adjudicated North and Central subbasins in the Wright Judgement, and GWD does not pump any groundwater from the West subbasin. In 1998, the Court found that the Goleta Groundwater Basin achieved hydrologic balance, meaning that recharge exceeds extractions (GWD 2021; GWD 2023).

Groundwater elevations in the West subbasin were near the surface from the 1990s through approximately 2013. Groundwater levels declined slightly from 2013 to 2016 and have remained stable approximately 10 feet below ground surface since that time (GWD 2023). The groundwater basin is not classified as critically overdrafted (DWR 2025b). As part of the *Preliminary Geotechnical Report*, subsurface investigations were conducted for soils up to 51 feet in depth at the project site. Subsurface investigations did not reveal any static or perched groundwater underlying the project site (Appendix E).

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).

4.8.1.4 Flooding and Inundation

Per the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06083C1334G, the project site is located Zone X, defined by FEMA as an area of minimal flood hazard. Furthermore, there is no floodway or floodplain mapped for El Encanto Creek in the vicinity of the project site (FEMA 2025).

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 California Geological Survey's Tsunami Hazard Area Map, the project site is located outside of a Tsunami Hazard Area. Due to the absence of a large body

[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.

of water, such as a reservoir, in proximity to the project site, the project site is not subject to inundation from seiche. There are no levees or dams upstream of the project site.

4.8.2 Regulatory Setting

a. Federal Regulations

Federal 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 NPDES regulations for stormwater and other pollutant discharges.

Congress amended CWA in 1987 to require the implementation of a two-phased program to address stormwater discharges. Phase I, promulgated by the United States Environmental Protection Agency (USEPA) in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4)[2] serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and ten categories of industrial activities.

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, to further improve stormwater quality, 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. Goleta is considered a small MS4.

In addition, Sections 401 and 404 of the CWA 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 must be developed for each impairing water quality constituent. A Total Maximum Daily Load 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 Total Maximum Daily Load is allocated among current and future dischargers into the water body.

Federal Anti-Degradation Policy

The federal Anti-Degradation Policy requires states to develop statewide anti-degradation policies and identify methods for implementing them (40 Code of Federal Regulations [CFR] Section 131.12). These policies and implementation methods, at a minimum, protect and maintain (1) existing

[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.

instream uses; (2) existing water quality where the quality of waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource. State permitting actions must be consistent with the federal Anti-Degradation Policy.

b. State Regulations

Porter-Cologne Water Quality Control Act (California Water Code)

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 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 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 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 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).

State Anti-Degradation Policy

The SWRCB adopted Resolution No. 68-16 (October 28, 1968), "Statement of Policy with Respect to Maintaining High Quality Waters in California" (more commonly referred to as the state Anti-Degradation Policy), which restricts the degradation of surface waters of the state and protects bodies of water where the existing water quality is higher than necessary for the protection of present and

anticipated designated beneficial uses. This state policy is generally consistent with the subsequently adopted federal Anti-Degradation Policy, discussed above. State policy differs from federal policy in that it applies to: (1) all waters, including surface waters and groundwater; (2) reductions in water quality since 1968; (3) all uses, both existing and potential uses, instream and off-stream; and 4) only high quality (i.e., Tier 2) waters. Locally, the State policy is implemented by the Central Coast RWQCB.

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. 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. SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts of groundwater basins. SGMA also requires the formation of local groundwater sustainability agencies 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 and therefore no Groundwater Sustainability Plan is required for the Basin (DWR 2025a).

Adjudicated basins, such as the Goleta Groundwater Basin, are exempt from forming a groundwater sustainability agency and developing a groundwater sustainability plan. Therefore, GWD continues to administer its duties in accordance with the Wright Judgment adjudication (GWD 2021). However, SGMA requires watermasters or managers of adjudicated groundwater basins submit information to DWR annually on groundwater elevations, groundwater production, surface water supply used or available for groundwater recharge, total water use, and change in groundwater storage along with the annual report submitted to the court.

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 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 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.

Groundwater Management Plan Goleta Groundwater Basin

GWD's *Groundwater Management Plan Goleta Groundwater Basin* serves as the guiding document for GWD to manage groundwater in accordance with the Wright Judgement (GWD 2023). This plan describes the physical and legal context of groundwater management in the Basin, addresses groundwater quantity and quality issues, reviews and updates previously adopted Basin Management Objectives, and describes current and recommended future strategies. GWD utilizes this plan to maintain sustainable groundwater levels in the Basin.

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 (PCR) 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).

City of Goleta General Plan/Coastal Land Use Plan

The City of Goleta General Plan/Coastal Land Use Plan Safety Element contains policies which assist the City to minimize flood damage to structures and people. Policy SE 6.6 is relevant to the proposed project and listed below (City of Goleta 2006):

- **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 that 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 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.

4.8.3 Impact Analysis

4.8.3.1 Methodology and Significance Thresholds

Methodology

The proposed project's impacts related to hydrology and water quality are evaluated based on the proposed project's adherence to local, state, and federal regulations; the proposed project's design, demolition and grading activities, and 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.

Significance Thresholds

The following thresholds are based on Appendix G of the *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;
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 2024 *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 County of Santa Barbara's 2024 *Environmental Thresholds 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 I), prepared for the proposed project serves as the required SWQMP.

4.8.3.2 Project Impacts and Mitigation Measures

Threshold 1:	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Impact HYD-1 PROJECT CONSTRUCTION COULD DEGRADE WATER QUALITY THROUGH INCREASED EROSION, RISK OF SPILLS FROM CONSTRUCTION EQUIPMENT, AND THE DISCHARGE OF SEDIMENT. IN ADDITION, CONSTRUCTION COULD DEGRADE WATER QUALITY THROUGH INTRODUCTION OF HAZARDOUS MATERIALS SUCH AS ASBESTOS AND LEAD TO STORMWATER RUNOFF. THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*. PROJECT OPERATION WOULD INCLUDE STORMWATER INFRASTRUCTURE THAT WOULD MINIMIZE THE AMOUNT OF SEDIMENTS AND OTHER POLLUTANTS DISCHARGED DURING OPERATION. OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The SWRCB has listed El Encanto Creek as impaired by turbidity, E. coli, nitrate, dissolved oxygen, and imbalanced pH levels (SWRCB 2025). This analysis evaluates the potential for the proposed project to further impair El Encanto Creek, potentially leading to discharge of these pollutants into the Devereaux Slough and Pacific Ocean.

Construction Impacts

Potential impacts on water quality from construction-related activities would occur due to demolition, vegetation removal, grading, and use of construction materials on the site. While the project does not require construction activities within El Encanto Creek, there is a potential for pollutants to be transported from the project site to downstream receiving waters, including El Encanto Creek, during construction.

As discussed in Section 4.7, *Hazards and Hazardous Materials*, the Phase I Environmental Site Assessment prepared for the proposed project (Appendix F) states that, due to the age of the on-site structures, there is potential for on-site structures to contain asbestos and lead-based paint. Demolition activities would occur in the vicinity of El Encanto Creek and have the potential to release these pollutants into on-site soils, where they could then be transported downstream in stormwater runoff during storm events. 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, as described in Section 4.7, *Hazards and Hazardous Materials*, demolition and construction activities would be required to adhere to the Santa Barbara County Air Pollution Control District regulations regarding asbestos and California Department of

Public Health regulations regarding lead-based paint materials. However, as described in Section 4.7, *Hazards and Hazardous Materials*, the release of lead-based materials or asbestos is possible if improperly handled, which could result in pollutant discharge during demolition. Therefore, this impact would be potentially significant.

As described in Section 4.8.1, *Setting*, subsurface investigations were conducted for soils up to 51 feet in depth at the project site. Subsurface investigations did not reveal any static or perched groundwater underlying the project site. Accordingly, encountering groundwater during excavation or other ground disturbing activities during construction is not anticipated. Therefore, discharge of dewatered groundwater to surface waters is not anticipated.

E. coli is primarily a result of bacteria loads in water, and construction would not introduce substantial wastes (i.e., wastewater, pet wastes, wildlife wastes) or introduce livestock or other animals which could substantially increase E. coli concentrations in El Encanto Creek. In addition, on-site portable toilets would be provided for construction workers, which would be handled by a licensed waste contractor to minimize the potential of waste release, and limit the potential for release of E. coli. In addition, as a Condition of Approval, the City would require that portable toilet placement only occur in designated staging areas located at least 100 feet from El Encanto Creek. Therefore, construction would not have the potential to introduce E. coli into El Encanto Creek.

The proposed project would involve over one acre of site disturbance during grading and the construction of residences, sidewalks, roadways, patios, landscaping, and associated facilities. Construction would involve grading of approximately 27,500 cubic yards of cut and 23,500 cubic yards of fill. This grading activity would involve vegetation removal and expose soil to erosion and potentially could cause sedimentation of El Encanto Creek which could further reduce dissolved oxygen levels, further imbalance of pH levels, increase turbidity, and result in the release of nitrates. Eroded soils can also transport other pollutants, if present in on-site soils. However, there is no known soil contamination on the project site. Soil sampling was conducted at the project site to determine the extent of residual organochlorine pesticides and arsenic potentially present in soil at the project site from past agricultural use. Organochlorine pesticides were not detected above the laboratory reporting limits and on-site arsenic levels were consistent with background concentrations and not indicative of elevated arsenic from past contamination. During onsite grading and building construction, hazardous materials such as fuels, paints, solvents, and concrete additives could be used which could be spilled or leaked and subsequently transported downstream during a storm event. However, these hazardous materials require proper management and disposal. Improper management of any resultant hazardous wastes could increase the opportunity for hazardous materials to release into surface water runoff and potentially infiltrate the underlying groundwater. As a Condition of Approval, the City would require that chemical storage, portable toilet placement, vehicle and/or equipment maintenance, and equipment refueling only occurs in designated staging areas located at least 100 feet from El Encanto Creek, which would minimize the risk of leaks or spills reaching surface waters.

In addition, 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 the 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. As stated in Municipal Code Section 15.09.110, the City's Planning and Environmental Review Director or designee would review the SWPPP as part of the grading permit application to ensure the City's required elements of an erosion and sediment control plan are implemented within the SWPPP. 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 to reduce risk of erosion, sedimentation, and leaks or spills during construction. The SWPPP would include identification of all potential construction-related pollutants and their sources, and implementation of BMPs to address and reduce each potential pollutant in stormwater runoff. Visual inspections are required weekly and before, during, and after storm events to ensure the BMPs remain in proper working order. In addition, the Construction Stormwater General Permit requires determination of a construction project's risk to receiving waters, based on the potential for sediment transport to receiving waters and the receiving water's sediment-sensitivity. Based on a construction project's risk, water quality monitoring (pH and turbidity) of stormwater runoff from the construction site may be required to ensure discharge limitation specified in the Construction Stormwater General Permit are not exceeded. The Construction Stormwater General Permit also requires reporting and corrective actions for any detected exceedances. The BMP, inspection, and monitoring requirements of the Construction Stormwater General Permit intended to reduce pollutants in stormwater runoff and ensure that water quality in receiving waters is not degraded. These requirements of the Construction Stormwater would minimize the potential for adverse water quality impacts, such as reductions in dissolved oxygen levels, further imbalance of pH levels, increased turbidity, and nitrate release, to further impair El Encanto Creek. Therefore, this impact would be less than significant.

Operational Impacts

For post-construction impacts, the primary source of pollutants would be oil, grease, and other materials deposited on the paved surfaces of internal roads, driveways, and parking areas from vehicles traveling to and from the project site. In addition, runoff from landscaped areas may contain pesticides, herbicides, fertilizers, and other chemical compounds. Pet waste could also be introduced into stormwater which could add E. coli and nitrates to stormwater. If unaddressed, pollutants from residential users could be discharged into receiving waters.

The *Stormwater Control Plan* (Appendix I), prepared for the proposed project serves as the required 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 design of landscaping to minimize irrigation and runoff, implementation of trash storage areas, regular sweeping of the parking lot and access roads, and regular drainage facility inspection and maintenance.

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 the discharge point. Proposed LID BMPs include the installation of a detention basin located in the western portion of the project site and an underground detention system located at the southern portion of the project site adjacent to Cathedral Oaks Road. Additional LID BMPs include the use of

above-ground rain barrels at each residence, and implementation of a bioswale and vegetated swale located in the open space area along Cathedral Oaks Road. Stormwater infrastructure would include media filters and biofiltration to filter pollutants out of stormwater prior to discharge to either El Encanto Creek or to storm drain outlets within Cathedral Oaks Road. This stormwater infrastructure would minimize the amount of sediments and wastes discharged in stormwater during operation, thereby minimizing the potential to contribute to the turbidity, E. Coli, dissolved oxygen, nitrate, and imbalanced pH impairments of El Encanto Creek.

The proposed project would increase the total impervious surfaces on-site by approximately 5.59 acres, which would exceed a 25 percent increase in impervious surfaces and could increase on-site stormwater runoff rates and subsequent pollutant discharge. The proposed project would include a detention basin located in the western portion of the project site and an underground detention system located at the southern portion of the project site. The proposed detention basin and underground detention system have been sized to capture, detain, and release stormwater at a controlled rate to ensure the post-project peak runoff outflows would be the same as the pre-project peak runoff outflows for a 100-year flood event. Detention systems reduce pollutants in stormwater by detaining stormwater runoff, allowing pollutants to settle out through sedimentation, and removing them through filtration as the water slowly passes through and drains out of the system, to ensure that pollutant discharge into El Encanto Creek and the City's storm drain system would not be increased as a result of the proposed project (Appendix H).

With implementation of design measures, and compliance with federal, state, and local regulatory requirements as described above, potential impacts for the release of pollutants into El Encanto Creek would be minimized. Runoff generated by the proposed project would be adequately treated and long-term impacts related to surface water and groundwater quality would be less than significant with compliance with state and local regulations.

Mitigation Measures

Mitigation Measures HAZ-1 and HAZ-2, described in Section 4.7, *Hazard and Hazardous Materials*, are required for the proposed project's construction-related impacts.

Significance After Mitigation

Mitigation Measures HAZ-1 and HAZ-2 in Section 4.7, *Hazards and Hazardous Materials*, require implementation of asbestos and lead-based paint abatement plans which require asbestos and lead-based components to be removed intact, proper transportation and disposal of asbestos and lead-based components, and the testing and monitoring of unidentified suspect materials prior to removal to confirm if asbestos and lead-based components are present in such materials. With implementation of Mitigation Measures HAZ-1 and HAZ-2, potential impacts for asbestos and lead-based materials to adversely contribute to water quality impairments in El Encanto Creek or substantially degrade water quality would be reduced to a less than significant level.

Threshold 2:	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 NOT SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE DUE TO THE HIGH RUNOFF POTENTIAL OF THE PROJECT SITE AND THE ABSENCE OF ON-SITE GROUNDWATER EXTRACTION. OPERATIONAL WATER DEMANDS WOULD BE MET WITHIN EXISTING ALLOCATIONS UNDER THE WRIGHT JUDGEMENT. CONSTRUCTION AND OPERATIONAL IMPACTS WOULD BE CLASS III, LESS THAN SIGNIFICANT.

As described in Section 4.8.1, *Setting*, subsurface investigations were conducted for soils up to 51 feet in depth at the project site. Subsurface investigations did not reveal any static or perched groundwater underlying the project site. Accordingly, encountering groundwater during excavation or other ground disturbing activities during construction is not anticipated, and construction would not substantially decrease groundwater supplies.

The project site does not currently contain impervious surfaces aside from the existing on-site structures. The proposed project would increase the total impervious surfaces on-site by approximately 5.59 acres, which would exceed a 25 percent increase in impervious surfaces. However, as described in Section 4.8.1, *Setting*, on-site soils are classified as Group D, which have high runoff potential. Due to the high runoff potential of on-site soils, there is a low potential for groundwater infiltration on the project site under existing conditions. Given the limited infiltration potential of on-site soils (under both existing and post-project conditions), the proposed project would not substantially decrease groundwater infiltration rates on-site or result in substantial interference to groundwater recharge.

Operation of the proposed project would not require groundwater extraction on the project site. However, water demand for the proposed project would be met by GWD which sources its water, in part, from the Goleta Groundwater Basin. GWD is subject to the adjudication requirements of the Wright Judgement, which established extraction, storage requirements, and allowable uses of groundwater to achieve and maintain hydrologic balance (which was achieved in 1998), 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. The basin is not designated as critically overdraft and is required to be managed to maintain hydrologic balance. As described in Section 4.13, *Utilities and Service Systems*, GWD has anticipated adequate water supplies available to meet its projected demands through the year 2040 (GWD 2021). The proposed project would be required to undergo GWD review prior to issuance of a Can and Will Serve Letter, stating that GWD has sufficient water available to support the proposed project. Finally, 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. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3(i):	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 **THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR SURROUNDING AREA IN A WAY THAT WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION. CONSTRUCTION WOULD INCLUDE IMPLEMENTATION OF A SWPPP AND BMPS TO CONTROL SEDIMENTATION, WHILE PROJECT OPERATION WOULD INCLUDE A DETENTION BASIN AND UNDERGROUND DETENTION SYSTEM THAT WOULD MAINTAIN EXISTING RUNOFF RATES AND THUS MAINTAIN THE EXISTING RATES OF EROSION FROM STORMWATER FLOWS ON-SITE. CONSTRUCTION AND OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT.***

Construction

As discussed under Impact HYD-1, construction activities would increase the potential for erosion and sedimentation. However, such activities would be required to comply with the Construction Stormwater General Permit, the City Municipal Code, as well as implementation of the required SWPPP and construction BMPs would minimize sediment discharge in stormwater runoff. With implementation of the SWPPP and construction BMPs (including erosion control and sediment control BMPs), visual inspections, and water quality (turbidity) monitoring required in compliance with the Construction General Permit, construction phase erosion and siltation would be minimized and would not substantially alter the existing drainage pattern of the site or area in a manner which would result in a substantial erosion or siltation on- or off-site. Construction impacts would be less than significant.

Operation

The project site does not currently contain impervious surfaces aside from the three existing on-site structures. The proposed project would increase the total impervious surfaces on-site by approximately 5.59 acres, which would exceed a 25 percent increase in impervious surfaces. The increase in impervious area would increase stormwater runoff compared to existing conditions (Appendix H). The remainder of the project site would consist of landscaping, which would include installation of native, drought-tolerant plants. The drought-tolerant native plants would require less water compared to existing conditions. In addition, the proposed project's landscaping irrigation equipment would be controlled by an automatic timer with a seasonal adjustment to apply less water during the rainy season, which would minimize the potential for soil erosion to occur due to overwatering.

The proposed project would include a detention basin located in the western portion of the project site and an underground detention system located at the southern portion of the project site. The proposed detention basin and underground detention system have been sized to ensure the post-project peak runoff outflows would be the same as the pre-project peak runoff outflows for a 100-year flood event (Appendix H).. Accordingly, stormwater discharge rates with implementation of the detention systems would be the same as existing conditions, which would therefore not increase erosion off-site (downstream). The impervious surfaces introduced as part of the proposed project would not be subject to erosion. In addition, on-site landscaped areas would help maintain soil structure and minimize the potential for on-site erosion to occur. Therefore, project operation would not substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion or siltation on-or off-site. Operational impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3(ii):	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 THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE IN A WAY THAT WOULD INCREASE ON- OR OFF-SITE FLOODING COMPARED TO EXISTING CONDITIONS. CONSTRUCTION WOULD INCLUDE IMPLEMENTATION OF A SWPPP AND BMPS TO MANAGE RUNOFF, WHILE PROJECT OPERATION WOULD MAINTAIN PEAK STORMWATER DISCHARGE FLOWS THROUGH A DETENTION BASIN, UNDERGROUND DETENTION SYSTEM, AND ON-SITE STORM DRAIN SYSTEM. CONSTRUCTION AND OPERATIONAL IMPACTS RELATED TO FLOODING WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

As described in Section 4.8.1, *Setting*, under existing conditions, the eastern half of the project site drains south towards Cathedral Oaks Road and the western half of the project site drains southwest toward El Encanto Creek. Project site soils are classified within Hydrologic Soil Group D which have low infiltration rates, high runoff potential when wet, and typically contain greater than 40 percent clay (United States Department of Agriculture-Natural Resources Conservation Service 2009).

Construction

Construction activities, such as grading – which would change the local topography of the site – could redirect flood flows on the project site, resulting in localized flooding compared to existing conditions. However, as discussed under 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. 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

The proposed project would increase the total impervious surfaces on-site by approximately 5.59 acres. An increase in impervious surface area can increase stormwater runoff to existing conditions. As detailed in the *Conceptual Hydrology and Hydraulic Study* (Appendix H), the detention basin and underground detention system would collect and detain stormwater and release it at a controlled rate to ensure discharge runoff rates during a 100-year flood event would not exceed existing conditions. Because stormwater runoff discharge from the project site would not increase compared to existing conditions, the proposed project would not result in off-site flooding. The project site is not located within a flood hazard zone and would therefore not place structures in a floodplain in a manner that could increase flooding. Additionally, the stormwater LID BMPs and on-site drainage facilities (i.e., outlet pipes) would be sized to collect and convey stormwater runoff on the project site such that an increase in localized on-site flooding compared to existing conditions would not occur. Although the proposed project includes an outfall to El Encanto Creek, the outfall would not obstruct flow because it would be in the channel back and discharge to the creek would not increase. Therefore, the proposed project would not alter the course of El Encanto Creek. Overall, project operation 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.

Mitigation Measures

No mitigation is required.

Threshold 3(iii): 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 THE PROPOSED PROJECT COULD INTRODUCE ADDITIONAL SOURCES OF POLLUTED RUNOFF DURING CONSTRUCTION DUE TO ACTIVITIES SUCH AS HAZARDOUS MATERIALS HANDLING DURING DEMOLITION. THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*. OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*, DUE TO THE PROPOSED IMPLEMENTATION OF STORMWATER TREATMENT INFRASTRUCTURE.

As described in Section 4.8.1, *Setting*, under existing conditions, the eastern half of the project site drains south towards Cathedral Oaks Road and the western half of the project site drains southwest toward El Encanto Creek. Project site soils are classified within Hydrologic Soil Group D which have low infiltration rates, high runoff potential when wet, and typically contain greater than 40 percent clay (United States Department of Agriculture-Natural Resources Conservation Service 2009).

Construction

Construction activities would alter the existing drainage patterns on the project site, which could alter stormwater flows on the project site compared to existing conditions. As detailed under Impact HYD-1, construction activities have the potential to increase discharge of pollutants in stormwater runoff from the project site compared to existing conditions. As further discussed under Impact HYD-1, construction would comply with several regulations such as the Construction Stormwater General Permit and the City Municipal Code intended to control stormwater runoff and reduce pollutants and ensure construction activities would not result in substantial runoff water which would exceed the capacities of El Encanto Creek. However, even with adherence to regulatory requirements, construction activities could result in additional sources of polluted runoff related to asbestos and lead-based paints if these materials are improperly handled, which could result in pollutant discharge during demolition. This impact would be potentially significant.

Operation

As discussed under Impact HYD-1, the proposed project would increase impervious surface area on the site, which could increase on-site stormwater runoff rates and subsequent pollutant discharge. As noted previously, the project would include the installation of a detention basin located in the western portion of the project site and an underground detention system located at the southern portion of the project site adjacent to Cathedral Oaks Road. As detailed in the *Conceptual Hydrology and Hydraulic Study* (Appendix H), these facilities would ensure existing runoff discharge rates would not increase compared to existing conditions for the 100-year flood event) by capturing stormwater runoff and releasing it at a controlled rate. Because stormwater runoff from the project site would not be increased compared to existing conditions, the proposed project would not result in an exceedance of the capacity of existing or planned stormwater drainage systems. Furthermore, proposed stormwater infrastructure would treat stormwater to reduce pollutants prior to discharge, ensuring operation of the proposed project would not provide substantial additional sources of

polluted runoff. Therefore, project operation would not 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. This impact would be less than significant.

Mitigation Measures

Mitigation Measures HAZ-1 and HAZ-2, described in Section 4.7, *Hazard and Hazardous Materials*, are required for the proposed project's construction-related impacts.

Significance After Mitigation

Implementation of Mitigation Measures HAZ-1 and HAZ-2 in Section 4.7, *Hazards and Hazardous Materials,* require implementation of asbestos and lead-based paint abatement plans which require asbestos and lead-based components to be removed intact, proper transportation and disposal of asbestos and lead-based components, and the testing and monitoring of unidentified suspect materials prior to removal to confirm if asbestos and lead-based components are present in such materials. With implementation of Mitigation Measures HAZ-1 and HAZ-2, potential impacts for asbestos and lead-based materials to provide substantial sources of polluted runoff would be reduced to a less than significant level.

Threshold 3(iv): 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 SITE IN A WAY THAT COULD IMPEDE OR REDIRECT FLOOD FLOWS BECAUSE THE PROJECT SITE IS NOT LOCATED WITHIN A FLOOD HAZARD ZONE. NO IMPACT WOULD OCCUR

The project site is not located within a flood hazard zone. Rather, the project site is located within Zone X, defined as an area of minimal flood hazard. While the proposed project would alter on-site drainage patterns, proposed development would not impede or redirect flood flows on-site because the project site is not located within a flood hazard zone. Furthermore, because the proposed detention systems would discharge stormwater flows from the site at a controlled rate such that stormwater flow rates would not increase compared existing conditions, the proposed project would not alter off-site flooding or drainage. No impact would occur.

Mitigation Measures

No mitigation is required.

Threshold 4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact HYD-7 THE PROJECT SITE IS LOCATED OUTSIDE OF A FLOOD HAZARD ZONE, TSUNAMI HAZARD AREA, DAM INUNDATION AREA, OR SEICHE AREA. THEREFORE, THE PROPOSED PROJECT WOULD NOT RISK RELEASE OF POLLUTANTS DUE TO INUNDATION IN THESE ZONES. NO IMPACT WOULD OCCUR

As described in Section 4.8.1, *Setting*, the project site is located outside of a flood hazard zone. There are no levees or dams upstream of the project site that would inundate the proposed project in the event of a dam or levee failure. 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 entirety of

the project site lies outside of a tsunami inundation zone. Therefore, the proposed project would not risk the release of pollutants from project structures due to inundation. No impact would occur.

Mitigation Measures

No mitigation is required.

Threshold 5:	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-8 CONSTRUCTION OF THE PROPOSED PROJECT COULD DEGRADE WATER QUALITY THROUGH INCREASED EROSION, RISK OF SPILLS FROM CONSTRUCTION EQUIPMENT, THE DISCHARGE OF SEDIMENT, AND INTRODUCTION OF ASBESTOS AND LEAD TO STORMWATER RUNOFF. THIS COULD POTENTIALLY CONFLICT WITH THE BASIN PLAN. THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*. PROJECT OPERATION WOULD INCLUDE STORMWATER INFRASTRUCTURE THAT WOULD MINIMIZE THE AMOUNT OF SEDIMENTS POLLUTANTS DISCHARGED THEREBY MINIMIZING POLLUTANTS IN EXCESS OF WATER QUALITY OBJECTIVE QUANTITIES IDENTIFIED IN THE BASIN PLAN. OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The Basin Plan, adopted by the Central Coast RWQCB, is the water quality control plan applicable to the project site. The Basin Plan sets forth objectives for pollutant management and establishes implementation programs to achieve water quality objectives to protect beneficial uses. A project's potential to conflict with the Basin Plan is related to a project's potential to degrade water quality. The Basin Plan does not identify beneficial uses for El Encanto Creek (Central Coast RWQCB 2019). As described in Section 4.8.1, *Setting*, El Encanto Creek is impaired by turbidity, E. coli, nitrate, dissolved oxygen, and imbalanced pH levels (SWRCB 2025).

As discussed under 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 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 existing requirements, 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, as described in Impact HYD-1, the proposed project still has the potential to result in water quality impacts in El Encanto Creek during construction related to asbestos and lead-based materials. These construction activities could introduce pollutants exceeding water quality objectives, which could conflict with the Basin Plan. Construction impacts related to Basin Plan conflicts would be potentially significant.

Project operation would include use of a detention basin, underground detention system, bioswale, vegetated swale, and media filters. These stormwater infrastructure features would capture and treat stormwater runoff by filtering pollutants out of stormwater prior to discharge, thereby minimizing the potential to result in pollutants in excess of water quality objective quantities identified in the Basin Plan. Therefore, impacts during operation would be less than significant.

GWD's *Groundwater Management Plan Goleta Groundwater Basin* serves as the guiding document for GWD to manage groundwater in accordance with the Wright Judgement (GWD 2023). As described under Impact HYD-2, the proposed project would not adversely impact groundwater supplies, and the proposed project would not interfere with the management of the Basin in

accordance with the Wright Judgement. As described in Section 4.13, *Utilities and Service Systems*, GWD has anticipated adequate water supplies to be available through 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. Therefore, impacts related to conflicts with or obstruction of a sustainable groundwater management plan would be less than significant.

Mitigation Measures

Mitigation Measures HAZ-1 and HAZ-2, described in Section 4.7, *Hazard and Hazardous Materials*, are required for the proposed project's construction-related impacts.

Significance After Mitigation

Mitigation Measures HAZ-1 and HAZ-2 in Section 4.7, *Hazards and Hazardous Materials,* would reduce potential surface water quality impacts related to the introduction of pollutants associated with the improper handling of asbestos or lead-based materials during demolition. With implementation of Mitigation Measures HAZ-1 and HAZ-2, the proposed project would reduce the potential to conflict with or obstruct implementation of a water quality control plan to a less than significant level.

4.8.4 Cumulative Impacts

Regional cumulative impacts consider impacts that would occur from reasonably anticipated projects identified in Table 3-1 of Chapter 3, *Related Projects*. The geographic scope for cumulative impacts related to water quality, drainage, and sedimentation is the El Encanto Creek watershed. This geographic scope is appropriate as stormwater from development in this area would discharge to El Encanto Creek and could contribute to existing impairments in El Encanto Creek. The geographic scope for cumulative impacts related to groundwater are projects within the GWD service area. This geographic scope is appropriate as GWD would provide water to cumulative development which, in part, is sourced from the Basin. As the proposed project would result in no impact related to flooding, the proposed project has no potential to contribute to cumulative impacts related to flooding. As such, cumulative impacts related to flooding are not discussed herein. The general approach to cumulative impact analysis used in this EIR is discussed in Chapter 3, *Related Projects*.

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 waters as the proposed project (i.e., El Encanto Creek). As described in Section 4.8.1, *Setting*, El Encanto Creek is impaired by a variety of pollutants, including turbidity, E. coli, nitrate, dissolved oxygen, and imbalanced pH levels (SWRCB 2025). The Annual Pavement Rehabilitation Project and Pavement Management Program and Glen Annie Golf Course Residential Development described in Table 3-1 of Chapter 3, *Related Projects*, are examples of cumulative projects that would also potentially discharge stormwater runoff to El Encanto Creek and contribute to pollutant loading in stormwater runoff discharged to these waterways. Cumulative projects would be required to comply with federal, state, and City water quality requirements, such as the Construction Stormwater General 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 El Encanto Creek could continue to result in continued impairment of the waterway. Due to the existing impairment of El Encanto Creek and the potential for cumulative development to discharge pollutants to El Encanto Creek, cumulative impacts to water quality, drainage, and sedimentation would be significant.

The proposed project's demolition activities would be required to obtain coverage from SWRCB's Construction Stormwater General Permit, which includes requirements for projects to address demolition-related pollutants. The construction contractor would also be required to comply with Mitigation Measures HAZ-1 and HAZ-2 to minimize the potential for pollutants associated with asbestos and lead-based materials would enter runoff and degrade water quality. Construction 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. 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. The proposed project would implement a detention basin and underground detention system in accordance with the *Stormwater Control Plan* (Appendix I) prepared for the proposed project, which serves as the SWQMP for the proposed project. Compliance with these existing regulations to protect water quality, installation of stormwater control and treatment infrastructure proposed as part of project design, and implementation of Mitigation Measures HAZ-1 and HAZ-2, would ensure the proposed project's contribution to significant cumulative water quality impacts would not be considerable.

Groundwater

Development of the cumulative projects in Goleta (as detailed in Table 3-1) would add a total of 534 residential units, 440,599 square feet of industrial space, and 163,930 square feet of commercial space in Goleta, in addition to the potential construction of up to 1,000 residential units on the Glen Annie Golf Course site, which would increase water demand in the GWD service area. 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 acre-feet per year. 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 acre-feet per year 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.

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4.9 Land Use and Planning

This section analyzes the proposed project's consistency with applicable City of Goleta land use requirements and policies. Additional discussion on the proposed project's consistency with applicable plans is provided in the following sections: Section 4.1, *Aesthetics and Visual Resources*; Section 4.3, *Biological Resources*; Section 4.6*, Greenhouse Gas Emissions;* and Section 4.11*, Transportation and Circulation*.

4.9.1 Setting

4.9.1.1 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 2006). 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 some agricultural land.

4.9.1.2 Project Site and Surrounding Land Uses

The project site encompasses approximately 14.38 net acres designated as Assessor's Parcel Number (APN) 077-530-019. The project site is surrounded by the Glen Annie Golf Course to the north and east; El Encanto Creek, Northgate Road, and multi-family residential development to the west; and Cathedral Oaks Road and single-family residences to the south. Dos Pueblos Senior High School is approximately 1,500 feet to the southeast of the project site at Cathedral Oaks Road and Alameda Avenue. South Coast Montessori School is located approximately 1,000 feet south of the project site at Mirano Drive. The Evergreen Learning Center and Brandon School are located approximately 1,800 feet southwest of the project site at the intersection of Evergreen Drive and Brandon Drive.

The project site is currently a large fallow field with three small, vacant buildings including a 2,015-square-foot single-family residence, 726-square-foot garage, and 1,152-square-foot barn. The project site has a land use designation of Agriculture and is zoned AG-40 (Agriculture II, 40-acre minimum lot size), which does not permit residential development. Although designated for Agricultural use in the City of Goleta General Plan/Coastal Land Use Plan and zoned AG-40, there is currently no agricultural activity occurring on the project site. The project site was occupied by an avocado orchard until the mid-1990s, but has been fallow since approximately 1995. The project site is currently used in part for the storage of woodchips and firewood.

In 2025, the California Department of Forestry and Fire Protection designated the project site in the Local Responsibility Area primarily designated as a very high fire hazard severity zone, with the southeastern portion of the project site designated as a high fire hazard severity zone. Portions of the western border of the project site are located within the 100-foot Streamside Protection Area (SPA) buffer of El Encanto Creek. In addition, a small area within the southwestern portion of the project site is mapped as Environmentally Sensitive Habitat Area for Arroyo Willow Riparian Shrubland and Coastal Sage Scrub.

4.9.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations applicable to the proposed project with regard to land use requirements and policies.

b. State Regulations

Builder's Remedy

The proposed project is subject to the "Builder's Remedy" and the protections of the Housing Accountability Act (HAA). Prior to January 1, 2025, the HAA prohibited a jurisdiction from denying a qualifying affordable housing project due to inconsistencies with the local zoning and/or general plan if an applicant submitted a preliminary application while the jurisdiction's housing element was out of substantial compliance with state Housing Element Law. (Gov. Code, § 65589.5(d)(5), (o)(1).)[1] This provision was commonly referred to, and is now officially known as, the "Builder's Remedy." In September 2024, the Governor signed Assembly Bill (AB) 1893, which amended the HAA to, among other things, further specify when the Builder's Remedy applies and how such applications are processed.[2] As discussed in California Government Code section 65589.5(f)(6)(D)(iii), "Any [Builder's Remedy] project that complies with this paragraph shall be deemed consistent, compliant, and in conformity with an applicable plan, program, policy, ordinance, standard, requirement, redevelopment plan and implementing instruments, or other similar provision for all purposes, and shall not be considered or treated as a nonconforming lot, use, or structure for any purpose." Among other things, the Builder's Remedy allows the proposed project to be developed on the project site without requiring a General Plan Amendment to change the project site land use designation or zoning from Agriculture to Single Family Residential. (Gov. Code, § 65589.5(f)(6)(D)(i).) In addition, the Builder's Remedy allows the project applicant to identify a local zoning district to be used as a basis for design consistency. (Gov. Code, § 65589.5(f)(6)(A).)

The project applicant submitted an SB 330 application for the proposed project in March 2023[3] and November 2023, at which time the City's 2023-2031 iteration of the Housing Element had not yet been certified by the California Department of Housing and Community Development.[4] In December 2023, the City returned the preliminary project application alleging it was improperly submitted. The project applicant filed a petition for writ of mandate in Santa Barbara County Superior Court, challenging the City's return of the SB 330 preliminary application. (*Shelby Family Partnership LP v. City of Goleta*, Case No. 24CV00548). After briefing and a hearing on the merits, the court ruled in the applicant's favor, ruling that the proposed project is subject to the Builder's Remedy and the protections of the HAA.

[1] As Government Code section 65589.5(d)(5) read before January 1, 2025 (i.e., before AB 1893 took effect).
[2] If an application was deemed complete before January 1, 2025, the HAA (as amended by AB 1893) allows the applicant to "choose to be subject to the provisions of [the HAA] that were in place on the date the preliminary application was submitted, or any or all of the provisions of [the HAA] applicable as of January 1, 2025." (Gov. Code, § 65589.5(f)(7)(A).)
[3] Five days later, the City Attorney sent a letter to the project applicant asserting, among other things, that the March 2023 preliminary application was improperly submitted and the project was not subject to the Builder's Remedy.
[4] The California Department of Housing and Community Development certified the City's 2023-2031 Housing Element on February 5, 2024.

California Density Bonus Law

California Density Bonus Law (California Government Code section 65915) offers significant benefits to housing development projects that include a qualifying amount of affordable units. Projects that meet the eligibility requirements of Density Bonus Law are entitled to (i) a density bonus (or bonuses) above the maximum allowable residential density, (ii) incentives/concessions,[5] (iii) waivers or reductions in development standards that physically preclude the proposed project,[6] and (iv) significantly reduced parking requirements.[7] (Gov. Code, § 65915 (b).) An applicant chooses whether to utilize some, or all, of the benefits available under Density Bonus Law.

AB 1893 clarified that the Builder's Remedy and Density Bonus Law can operate in tandem, provided that a project provides a sufficient quantity of affordable units to qualify under Density Bonus Law. (See Gov. Code, § 65589.5(f)(6)(B)-(C).) Here, of the proposed project's 56 units, 11 units (i.e., 19.6 percent) will be deed restricted affordable for 55 years as follows: (i) four units (7.1 percent) for extremely low income households; (ii) one unit (1.8 percent) for lower income households; (iii) three units (5.4 percent) for moderate income households; and (iv) three units (5.4 percent) for above moderate income households earning between 120 – 200 percent of area median income. Dedicating 7.1 percent of units to extremely low income households qualifies the project for benefits under Density Bonus Law. (Gov. Code, § 65915(b)(1)(B).)[8]

As a Builder's Remedy project that is dedicating at least 7 percent of units for extremely low income households (and thus qualifies under Density Bonus Law), the project is entitled to, among other things, four incentives/concessions and an unlimited number of waivers or reductions of development standards that physically preclude the project from being constructed as proposed by the applicant. (Gov. Code, § 65589.5(f)(6)(B)(i)(II), (C)(i), (iv).)[9] In accordance with the foregoing, the project applicant is seeking waivers for lot width, rear yard setback, and side yard setback reductions, house sizes that exceed the maximum floor area and a concession for reduction of the El Encanto Creek 100-foot SPA buffer.

c. Local Regulations

City of Goleta General Plan/Coastal Land Use Plan

The City of Goleta's General Plan/Coastal Land Use 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/Coastal Land Use Plan is the primary means for guiding future change in Goleta and provides a guide for decision-making. The General Plan/Coastal Land Use Plan includes the following elements: Land Use, Open Space, Conservation, Safety, Visual and Historic Resources, Transportation, Public Facilities, and Noise. The General Plan/Coastal Land Use Plan also

[5] A "concession or incentive" means: (1) a reduction in site development standards or a modification of zoning code requirements or architectural design requirements; (2) approval of mixed-use zoning if commercial, office, industrial, or other land uses will reduce the cost of the housing development, and the other uses are compatible with the project; and (3) other regulatory incentives or concessions proposed by the developer "that result in identifiable and actual cost reductions to provide for affordable housing costs." (Gov. Code, § 65915(k).)

[6] See Gov. Code, § 65915(e)(1).

[7] See Gov. Code, § 65915(p)(1).

[8] Under state law, very low income households include extremely low income households. (Health and Safety Code, § 50105(b).)

[9] A Builder's Remedy project automatically receives two incentives/concessions *in addition to those granted under Density Bonus Law*. (Gov. Code, § 65589.5(f)(6)(C)(i).) When a Builder's Remedy project qualifies by providing at least 7 percent extremely low income units, it is treated as if it were providing 10 percent very low income units under Density Bonus Law (which qualifies the project for two incentives/concessions). (Gov. Code, §§ 65589.5(f)(6)(C)(iv), 65915(d)(2)(B).)

includes a Housing Element, first adopted in 2006 and most recently updated in 2023. Relevant policies from the General Plan/Coastal Land Use Plan are listed in Table 4.9-2.

The project site has a General Plan/Coastal Land Use Plan land use designation of Agriculture, which does not permit the residential development that would occur with proposed project. As previously discussed, the proposed project is subject to the Builder's Remedy and protections of the Housing Accountability Act. As such, it does not require a General Plan Amendment to change the project site land use designation from Agriculture to Single Family Residential.

Goleta Municipal Code

The project site is zoned AG-40 (Agriculture II, 40-acre minimum lot size; City of Goleta 2025). Utilizing the Builder's Remedy, because there are no general plan designations or zoning classifications that allow the density and unit type proposed by the applicant, the project applicant has identified the RS-7 zone district as the most analogous zone to the proposed project; therefore, RS-7 is used as a basis for consistency determination. As stated in Goleta Municipal Code Section 17.07.010, the RS district is intended to protect land areas for families living in low-density residential environments by implementing the Single Family Residential Use designation established in the General Plan/Coastal Land Use Plan. Within the RS-7 zone district, the minimum lot area is 7,000 square feet (Goleta Municipal Code Section 17.07.030).

Urban Forest Management Plan

The City's Urban Forest Management Plan provides a five year policy framework for how trees within public areas of Goleta will be managed. The Urban Forest Management Plan is prepared pursuant to the City's Conservation Element, which calls for the development and maintenance of a Public Urban Forest Management Plan that: 1) describes and maps the resources; 2) includes a vision statement; 3) establishes measurable urban forest management goals and performance standards; and 4) presents a timeline for managing the Goleta Urban Forest. The Urban Forest Management Plan sets forth performance standards for aspects including tree inventory, canopy coverage, and species diversity, among other standards.

City of Goleta Bicycle and Pedestrian Master Plan

The City of Goleta's Bicycle and Pedestrian Master Plan (BPMP) serves as a strategic framework for enhancing active transportation throughout the community. It outlines the City's vision, goals, and priorities for creating a safe, accessible, and connected network of bicycle and pedestrian facilities. The BPMP supports broader transportation and land use objectives by promoting sustainable mobility options, reducing reliance on automobiles, and improving quality of life for residents and visitors alike.

The City's BPMP includes both proposed physical improvements, as well as visionary projects. The visionary projects are intended to address the likely, long-term solutions that would make Goleta a bicycle and pedestrian friendly community through the implementation of a convenient network of "low stress" infrastructure separated from motor vehicle traffic. The City has identified the Goleta Loop as a visionary project within a corridor of critical importance. The Goleta Loop would consist of a successfully integrated, separated loop around the northern half of Goleta using Cathedral Oaks Road, Hollister Avenue and the proposed San Jose Creek Path. Elements to the Goleta Loop would include a multi-use path (Class I or Class IV) along Hollister Avenue between Cathedral Oaks Road and Elderberry Drive, intended to connect to existing bicycle infrastructure and provide a continuous route along Hollister Avenue from the western end of Goleta all the way to Stearn's Wharf in Santa

Barbara. The Goleta Loop would also improve connections to the southern half of Goleta by making connections to UCSB, the coast, and other regional bikeways.

The City's BPMP includes policies intended to facilitate the implementation of bicycle- and pedestrian-related goals and policies in the City's General Plan/Coastal Land Use Plan. BPMP policies applicable to the proposed project include the following (City of Goleta 2018):

- **Policy TE 10: Pedestrian Circulation**. To encourage increased walking for recreational and other purposes by developing an interconnected, safe, convenient, and visually attractive pedestrian circulation system.
- **Policy TE 11: Bikeways Plan**. To encourage increased bicycle use for commuting and recreational purposes by developing an interconnected circulation system for bicycles that is safe, convenient, and within a visually attractive environment.

4.9.3 Impact Analysis

4.9.3.1 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. The purpose of this discussion is to identify if the proposed 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. For the purposes of this analysis, the proposed project is evaluated based on its consistency with applicable Municipal Code requirements. As described in Chapter 2, *Project Description,* the components of the proposed project which deviate from the RS-7 zone (i.e. lot widths of 60 feet, rear yard setbacks of 15 feet, reduced side yard setbacks, and maximum floor area of 35 houses exceeding the maximum permitted floor area in the RS-7 zone) would be evaluated consistent with California Density Bonus Law, which allows waivers to established development standards applicable to the RS-7 zone.

In addition, the proposed project is consistent with the General Plan/Coastal Land Use Plan and Bike and Pedestrian Master Plan if, considering all of its aspects, it will further the goals, objectives and policies of these plans overall.

Significance Thresholds

The following thresholds are based on Appendix G of the CEQA Guidelines. CEQA Guidelines Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on land use and planning. Would the project:

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.

The County's *Environmental Thresholds and Guidelines Manual* (2024; refer to Chapter 4, *Environmental Impact Analysis*) does not include thresholds related to land use and planning. Therefore, the following analysis relies solely on the *CEQA Guidelines* Appendix G thresholds identified above.

4.9.3.2 Project Impacts and Mitigation Measures

Threshold 1:	Physically divide an established community?

Impact LU-1 **THE PROPOSED PROJECT WOULD CONSIST OF A SUBDIVISION TO DEVELOP 56 SINGLE FAMILY RESIDENTIAL LOTS AND THREE OPEN SPACE PARCELS ON THE NORTHERN EDGE OF GOLETA. THE PROPOSED PROJECT WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY AND WOULD IMPROVE LOCAL CONNECTIVITY THROUGH THE CONSTRUCTION OF SIDEWALKS AND TRAILS THROUGH AND AROUND THE PROJECT SITE. IMPACTS RELATED TO DIVISION OF AN ESTABLISHED COMMUNITY WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.**

The project site is situated at the northern edge of Goleta. The project site is primarily bordered by recreational and natural lands, with the Glen Annie Golf Course to the north and east and El Encanto Creek to the west. Residential land uses are located across El Encanto Creek and Northgate Road on the west and across Cathedral Oaks Road to the South. No residential or other urban uses are located directly adjacent to the project site.

The proposed project includes subdivision of the project site for development of single-family residences and adjoining open space areas. The project provides two new access points on Cathedral Oaks Road; internal streets that connect to existing bicycle and pedestrian facilities; and internal sidewalks and pedestrian connections to the Class I multi-use path for bicycle and pedestrian use. These features would allow for integration with the surrounding circulation network. The project also includes frontage improvements along Cathedral Oaks Road between Northgate Drive to the west and the Glenn Annie Golf Course property to the east. These frontage improvements include two driveway entrances to the project site, and curb and gutter installation. The proposed project would improve connectivity within the local vicinity by expanding access through and around the project site, and serve to extend a similar type of development to the existing residential development in the area. The project does not include any new components that could divide an established community. Development of the project site would not result in the physical division of an established community, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 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 mitigating an environmental effect?

Impact LU-2 **THE PROPOSED PROJECT WOULD BE CONSISTENT WITH THE GOLETA MUNICIPAL CODE, AND CITY OF GOLETA BICYCLE AND PEDESTRIAN MASTER PLAN. HOWEVER, EVEN WITH IMPLEMENTATION OF MITIGATION, THE PROPOSED PROJECT WOULD BE INCONSISTENT WITH GOLETA GENERAL PLAN/COASTAL LAND USE PLAN POLICIES CE 1.9 AND 2.3. THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION*.**

The project site has a General Plan/Coastal Land Use Plan land use designation of Agriculture, which does not permit the residential development that would occur with the proposed project. As discussed in Section 4.9.2, *Regulatory Setting*, the proposed project is subject to the Builder's Remedy and protections of the Housing Accountability Act, and as such, does not require a General Plan

Amendment to change the project site land use designation from Agriculture to Single Family Residential or a zoning change.

Consistent with California Government Code section 65589.5(f)(6)(A), the proposed project will be evaluated for consistency with the regulations of the RS-7 zone district. Components of the proposed project which are not consistent with the RS-7 zone will be evaluated consistent with California Density Bonus Law which allows waivers for deviations from the standards identified within the RS-7 zone. As part of the proposed project, the project applicant is requesting the following concessions/incentives or waivers pursuant to Government Code Section 65915(a) for the following deviations from City standards:

- Four waivers from the RS-7 zone district standards:
  - Proposed lot widths of less than the 65 feet required in the RS-7 zone on 31 of the 56 proposed residential lots.
  - Proposed rear yard setbacks of less than the 25 feet required on 51 of the 56 proposed residential lots.
  - Proposed side yard setbacks of less than the 6.5' required on 32 of the 56 proposed lots. The reduction accommodates eaves on no less than 5 feet to the property line.
  - Allowed maximum floor area of 35 houses exceeding the maximum permitted floor area from 208 to 1,539 additional square feet. These floor area exceedances would occur on Lots 1 through 14, 20 through 23, 25 through 29, 32, 34, 36, 40, 41, 45, 46, 48, 50, 52, and 55.
- Encroachment into the required 100-foot SPA buffer[10] of approximately 7,786 square feet (0.18 acres) in the rear yards of Lots 1 through 8. portions of the houses on Lots 1 and 2, and for portions of sidewalk in Lot 38. To compensate for SPA buffer encroachment, the proposed project design includes 0.21 acre of additional open space provided outside of and adjacent to the edge of the 100-foot SPA buffer on proposed Lot 58.

Table 4.9-1 summarizes the proposed project's consistency with the RS-7 zone requirements, including lot area, lot width, floor area, density, building height, and setback requirements, as stipulated by Section 17.07.030 of the Goleta Municipal Code. As indicated in Table 4.9-1, the proposed project would meet the development standards of the RS-7 zone, following the approval of requested waivers pursuant to California Density Bonus Law.

[10] The 100-foot SPA buffer is required by Goleta General Plan/Coastal Land Use Plan Conservation Element Policy 2.2:Streamside Protection Areas.

Table 4.9-1 Project Consistency with Applicable Goleta Municipal Code Zoning Standards

RS-7 Zoning Requirements	Project Consistency
Minimum Lot Area: 7,000 square feet	**Consistent:** The project site is 14.38 net acres (15.8 gross acres). Proposed subdivision of the project site would result in 59 lots, including 56 residential lots and three open space lots. The residential lots would range from 7,217 gross square feet to approximately 20,898 gross square feet. Thus, the project would be consistent with the minimum lot area of 7,000 square feet.
Minimum Lot Width: 65 feet	**Consistent:** The proposed project includes lot widths of 60 feet, which is less than the 65-foot minimum lot width for the RS-7 zone district. As part of the proposed project, the applicant is requesting a waiver, pursuant to Government Code Section 65915(a), for the reduction in minimum lot widths. Following approval of this waiver request, allowed pursuant to California Density Bonus Law, which has been included as part of the proposed project evaluated throughout this environmental impact analysis, the proposed project would be consistent with minimum lot area requirements.
Maximum Floor Area: 2,180 to 3,410 square feet	**Consistent:** Of the proposed residential units, 35 would exceed the maximum permitted floor area of the RS-7 zone. While the floor area of up to 3,882 square feet would exceed the maximum floor area allowable under the RS zone district for the lot sizes included in the proposed project, the proposed project would be entitled to waivers pursuant to the California Density Bonus Law. Following approval of such waivers requested for the proposed project, the environmental effects of which are evaluated throughout this environmental impact analysis, the proposed project would be consistent with minimum floor area requirements.
Maximum Dwelling Unit Density: 5 units/acre	**Consistent:** The project site is 14.38 net acres (15.8 gross acres). Proposed subdivision of the project site would allow for development of 56 residential units, resulting in approximately 3.9 units/net acre. Thus, the proposed project would be consistent with the maximum dwelling unit density of 5 units/acre.
Maximum Building Height: 25 feet	**Consistent:** The roof height for the proposed residences would range from approximately 17 feet 9 inches for single-story residences to 23 feet 10 inches for two-story residences. Thus, the proposed project would be consistent with the maximum building height of 25 feet.
Minimum Setbacks (feet): *Front: 20 feet* *Interior Side: 10 percent of lot width; minimum 5 feet, maximum 10 feet* *Street Side: 10 feet* *Rear: 25 feet*	**Consistent:** The proposed residences would all have front yard and street side setbacks meeting the minimum setback requirements. However, the proposed project includes proposed rear yard setbacks of 15 feet and varying reduced side yard setbacks. As part of the proposed project, the project applicant is requesting a waiver, pursuant to California Density Bonus Law for the reduction in minimum setbacks. Following approval of this waiver request, which has been included as part of the proposed project evaluated throughout this environmental impact analysis, the proposed project would be consistent with minimum setback requirements.
Parking: 2 covered spaces per dwelling unit	**Consistent:** As shown on the project site plans (Appendix B), each proposed residential unit would include multi-space garage and driveway parking. Thus, the proposed project would meet the minimum parking requirements.

The project would require approval of a vesting tentative map, Development Plan, and waivers from the City to authorize the proposed development. Upon approval of these items as well as associated demolition and construction permits, the residential development would no longer be considered non-conforming and would instead be conforming uses under the Goleta Municipal Code, California Housing Accountability Act "Builder's Remedy," and California Density Bonus Law. This framework for approval would resolve any non-conformance issues based on land use and zoning, and align the project site's use with the City's Single Family Residential land use designation and RS-7 zone district. These actions would not result in physical environmental impacts beyond those already analyzed in this EIR but are subject to review by the City of Goleta.

The proposed project's consistency with the City of Goleta General Plan/Coastal Land Use Plan, is discussed in Table 4.9-2. As shown therein, the project would be consistent with applicable Goleta General Plan/Coastal Land Use Plan land use policies adopted for the purpose of avoiding or mitigating an environmental effect, following the implementation of project-specific mitigation measures.

The proposed project includes several elements that support bicycle and pedestrian travel. As discussed in Section 4.11, *Transportation and Circulation*, the proposed project includes two new access points on Cathedral Oaks Road; internal streets that connect to existing bicycle and pedestrian facilities; and internal sidewalks and pedestrian connections to the Class I multi-use path for bicycle and pedestrian use. The Class I trail would provide an exclusive right-of-way for bicycle and pedestrian use and minimize vehicle cross flows (i.e., the locations which a vehicle can cross the pathway). The Class I trail would be consistent with the locations of bicycle infrastructure shown in Figure 4-19, Future Active Transportation Network Map, of the BPMP. The proposed project supports BPMP Policy TE 10 and Policy TE 11 by providing pedestrian linkages and maintaining connectivity to the City's planned bikeway system (City of Goleta 2006). This would be achieved with the proposed project by the inclusion of frontage improvements along Cathedral Oaks Road between Northgate Drive to the west and the Glenn Annie Golf Course property to the east. The proposed project would not remove existing pedestrian or bicycle infrastructure, create physical barriers to non-motorized travel, or degrade safety or connectivity in a way that causes a measurable impact on the physical environment. Accordingly, the proposed project would be consistent with the policies and vision for active transportation infrastructure in Goleta set forth within the City's BPMP.

As discussed in Section 4.3, *Biological Resources*, the proposed project would result in development within the SPA. Specifically, encroachment into the SPA buffer would be required for approximately 7,786 square feet (0.18 acre) of residential development on Lots 1 through 8; portions of the houses on Lots 1 and 2; a new, 90-foot storm drain pipe and approximately 11,283 square feet of stormwater infrastructure, a meandering path, landscaping, and 65 feet of sidewalk. General Plan/Coastal Land Use Plan Policy CE 2.2, listed fully in Table 4.9-2, and Goleta Municipal Code Section 17.30.070 allow for site-specific reductions to the 100-foot buffer under limited circumstances. As detailed in Table 4.9-2, the proposed encroachments into the 100-foot buffer are consistent with Policy CE 2.2.

Policy CE 2.3, listed fully in Table 4.9-2, describes allowable uses and activities in the SPA buffer. While the stormwater infrastructure, meandering path, and sidewalk are considered allowable uses pursuant to Policy CE 2.3, the residential development is not an allowable use pursuant to Policy CE 2.3. As such, the proposed project would be potentially inconsistent with this policy, which specifically limits allowable uses in SPAs to resource-dependent activities. While the proposed project would be inconsistent with Policy CE 2.3, such conflict does not inherently result in a significant environmental impact under CEQA. CEQA significance is determined by whether a conflict with a plan would lead to a substantial adverse physical change in the environment. In this case, the inconsistency is limited to

the type of development (i.e., residential use) rather than the extent or severity of physical impacts, which are addressed through mitigation measures and site design. The proposed development within the SPA buffer has been sited and designed to avoid riparian vegetation and minimize grading, and would not result in significant degradation of streamside habitat or hydrology. Therefore, the proposed project's impact involving conflicts with Policy CE 2.3 would be less than significant.

The proposed project would involve land divisions for parcels within and adjacent to ESHA and would require development within ESHA or ESHA buffers, and would thus conflict with City of Goleta General Plan/Coastal Land Use Plan Policy CE 1.6 (Protection of ESHAs), Policy CE 1.9 (Standards Applicable to Development Projects), and Policy CE 5.3 (Protection of Coastal Bluff Scrub, Coastal Sage Scrub, and Chaparral ESHA). Policy CE 1.6 requires the protection of ESHA and prohibits development in ESHA and ESHA buffers, exempting certain development (e.g., public road crossings, utility lines, etc.) only when there are no feasible less environmentally damaging alternatives. Policy CE 1.9 establishes specific standards for development projects that may affect ESHA, including requirements to avoid ESHA impacts wherever feasible, maintain adequate buffers, and implement mitigation measures when avoidance is not possible. Policy CE 1.9(b) explicitly prohibits land divisions that would result in future development within ESHA or ESHA buffers unless the use is resource-dependent and sited to minimize impacts. Policy CE 5.3 requires a minimum 25-foot buffer around coastal sage scrub ESHA.

The proposed project would include the subdivision of land and siting of residential lots that would result in grading, landscaping, and construction within mapped ESHA and SPA buffer areas. These uses are not considered resource-dependent, and the resulting parcel configuration would permanently alter ESHA and reduce buffer integrity. Therefore, the proposed project would conflict with the intent and requirements of Policy CE 1.9, which is designed to prevent incremental loss of sensitive habitat through subdivision and development. The permanent loss of ESHA and ESHA buffer would result in a potential inconsistency with Policies CE 1.6 and CE 5.3 and Section 17.30.040 (Development and Mitigation of Impacts) of the Goleta Municipal Code. In addition, the proposed storm drain pipe, detention basin, and bike path would encroach on the 25-foot buffer required by Policy CE 5.3. While this development would make the proposed project potentially inconsistent with Policy CE 1.6, Policy CE 1.9(b), and CE 5.3, as described in Section 4.3, *Biological Resources*, the environmental impacts of development within ESHA buffers these impacts would be reduced to a less than significant level by requiring fencing around ESHA (BIO-7) and biological monitoring during construction and construction worker environmental awareness training (BIO-4). Mitigation Measure BIO-3 would reduce potential permanent impacts to ESHA by requiring compensatory mitigation for habitat loss due to project development. Accordingly, although the proposed project would be potentially inconsistent with Policy CE 1.9(b), such an inconsistency would not cause a significant environmental impact.

As discussed in Section 4.3, *Biological Resources*, the proposed project would potentially be inconsistent with the City of Goleta General Plan/Coastal Land Use Plan Policy CE 9.5, as well as the City's Urban Forest Management Plan and Goleta Municipal Code Chapter 15.09. While no native trees are located directly on the project site, three protected coast live oak trees have canopies and/or critical root zones that extend onto the project site. Although the project would avoid direct removal or substantial disturbance of these trees, construction activities within their critical root zones could result in indirect impacts, such as soil compaction or root damage, if appropriate protection measures are not implemented. However, as discussed in Section 4.3, *Biological Resources*, the proposed project would include implementation of BIO-8 which would require implementation of tree protection measures during project construction activities.

A detailed evaluation of the proposed project's consistency with applicable policies from the General Plan/Coastal Land Use Plan is provided in Table 4.9-2. In summary, the proposed project would be consistent with development standards of the Goleta Municipal Code, and would be consistent with applicable policies from the Goleta General Plan/Coastal Land Use Plan with the implementation of mitigation measures. Therefore, impacts related to conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant with mitigation.

Mitigation Measures

Mitigation Measures BIO-1 through BIO-8 in Section 4.3, *Biological Resources*; CUL-1 through CUL-3 in Section 4.4, *Cultural Resources*; GEO-1 and GEO-2 in Section 4.5, *Geology and Soils*; HAZ-1 and HAZ-2 in Section 4.7, *Hazards and Hazardous Materials*; and NOI-1 in Section 4.10, *Noise*, would reduce impacts involving conflicts with land use plans, policies, or regulations that were adopted for purposes of reducing environmental impacts. These mitigation measures would reduce impacts involving conflict with the Goleta General Plan/Coastal Land Use Plan as they would minimize potential impacts to protected environmental resources within the Goleta General Plan.

Significance After Mitigation

With the approval of waivers provided to the project applicant for deviations from City standards pursuant to Government Code Section 65915(a), project design would be consistent with City zoning requirements. With implementation of Mitigation Measures BIO-1 through BIO-8 in Section 4.3, *Biological Resources*; CUL-1 through CUL-3 in Section 4.4, *Cultural Resources*; GEO-1 and GEO-2 in Section 4.5, *Geology and Soils*; HAZ-1 and HAZ-2 in Section 4.7, *Hazards and Hazardous Materials*; and NOI-1 in Section 4.10, *Noise*, impacts related to conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant. With implementation of Mitigation Measures BIO-3, BIO-4, BIO-7, and BIO-8, the proposed project would be consistent with Policies CE 1.6 and CE 5.3. With implementation of Mitigation Measure BIO-8, the proposed project would be consistent with Policy CE 9.5. The proposed project would remain inconsistent with Policies CE 1.9 and 2.3; however, these inconsistencies are related to policy-level distinctions and would not result in a significant impact to the environment.

Table 4.9-2 Project Consistency with Applicable Land Use Policies

Policy	Project Consistency
Goleta General Plan	
Land Use Element (LU)	
LU 2.2 Residential Use Densities. All proposed residential projects shall be consistent with the recommended standards for density and building intensity set forth in this plan. The recommended densities described in the policies for the residential use categories and in Table 2-1 are maximum permitted densities but are not guaranteed. Density of development allowed on any site shall reflect site constraints, including: a. Environmentally sensitive habitat areas (ESHA) b. Areas prone to flooding and geologic, slope instability, or other natural hazards. C c. Areas with stormwater drainage problems. d. Presence of other significant hazards or hazardous materials. e. Protection of significant public and private views. f. Exposure to exterior noise levels that exceed a Community Noise Exposure Level (CNEL) of 60 dBA (see related NE 1.2). g. Areas with archaeological or cultural resources. h. Deficiencies in the type or level of services necessary for urban development, such as transportation facilities (roadway and pedestrian), sewer and water service, and emergency service response time. i. Prevailing densities of adjacent developed residential areas	**Consistent.** As described in Table 4.9-1, the proposed project would result in a density of 3.9 units/net acre, consistent with the maximum allowed dwelling unit density of 5 units/acre.
LU 2.4 Single-Family Residential Use Category (R-SF). The intent of this use category is to identify and protect appropriately located land areas for family living in low-density residential environments. Existing developed areas with this designation were generally subdivided at four units per acre or less and are characterized by a suburban atmosphere. This designation may be applied to provide a transition from the more intensely developed areas of the city to rural open spaces. The designation is also appropriate for areas that are subject to hazards or environmental constraints that limit the suitability of such areas for higher intensity uses. This designation is intended to provide for development of one single-family residence per lot at densities ranging from one or fewer to five units per acre. Assuming an average household size of 2.0 to 3.0 persons, this use category will allow population densities between 2.0 and 15.0 persons per acre.	**Consistent.** The proposed project is most analogous to the Single-Family Residential Use Category. The proposed project would result in a density of 3.9 units/net acre, consistent with the 4.0 units per acre or less identified within this policy. As described in Section 4.0.3.4, *Population and Housing*, of Chapter 4, *Environmental Impact Analysis*, the proposed project would result in an estimated population increase of 145 people. Based on the project site's size (14.38 acres), the proposed project would result in a population density of 10 people per acre, consistent with the population density range of between 2 and 15 persons per acre identified within this policy.

Policy	Project Consistency
LU 11.1 Pacing of Growth. The City shall ensure that the timing of new development is consistent with resource and service constraints, including, but not limited to, transportation infrastructure, parks, water supply, sewer system capacity, and energy availability.	**Consistent**. As described in Section 4.11, *Transportation and Circulation,* the proposed project would be consistent with policies addressing transit, roadway, bicycle, and pedestrian facilities. As described in Section 4.0.3.6, *Recreation*, of Chapter 4, *Environmental Impact Analysis*, the proposed project would not result in growth that would result in substantial deterioration of parks and recreation facilities. As described in Section 4.13, *Utilities and Service Systems*, adequate water supply, sewer system capacity, and energy infrastructure is available to serve the proposed project.
Open Space (OS)	
OS 6.5 Neighborhood Open Space. Neighborhood open space areas integrate natural features such as trees, riparian corridors, and varied undeveloped landscape with the adjacent neighborhoods. The following standards apply to neighborhood open space areas: a. Primary emphasis is placed on protection of the natural resource, with limited passive recreation activities such as trails. Accordingly, the locations of these facilities are based upon the presence of natural resources rather than accessibility to a service area. b. The typical size is variable and is based upon the physical extent of the natural resource area. c. Neighborhood open space areas should be made accessible to the surrounding neighborhood population through safe pedestrian and bicycle access, where feasible and appropriate. Onsite parking facilities are not appropriate in neighborhood open space areas. d. Typical facilities provided in neighborhood open space areas are limited to space for quiet or passive recreational activities. Structural or land improvements, other than dirt trails and resting areas, shall be avoided in these areas. Some neighborhood open space areas may integrate with a small neighborhood park (as described above), usually consisting of a small playground or similar active area. Restrooms and facilities for more intensive, active forms of recreation are not appropriate improvements in neighborhood open space areas.	**Consistent**. The layout of the proposed project includes the use of Lot 57 through Lot 59 specifically for open space containing landscaped areas that integrate with the natural riparian landscape adjacent to El Encanto Creek. Additional improvements on the open space lots would consist of a community picnic area on proposed Lot 57, which would provide for quiet and passive recreational landscape and resting areas.
OS 8.3: Preservation. The City shall protect and preserve cultural resources from destruction. The preferred method for preserving a recorded archeological site shall be by preservation in place to maintain the relationship between the artifacts and the archaeological context. Preservation in place may be accomplished by deed restriction as a permanent conservation easement, avoidance through site planning and design, or incorporation of sites into other open spaces to prevent any future development or use that might otherwise adversely impact these resources.	**Consistent.** The proposed project would implement Mitigation Measures CUL-1 through CUL-3, which require archaeological monitoring (CUL-1), a cultural resources sensitivity meeting for construction personnel (CUL-2), and procedures for evaluation and treatment of any discoveries made during construction (CUL-3). These measures include protocols for preservation in place, such as avoidance through site planning and reburial within the immediate vicinity, consistent with Policy OS 8.3.

Policy	Project Consistency
OS 8.4: Evaluation of Significance. For any development proposal identified as being located in an area of archaeological sensitivity, a Phase I cultural resources inventory shall be conducted by a professional archaeologist or other qualified expert. All sites determined through a Phase 1 investigation to potentially include cultural resources must undergo subsurface investigation to determine the extent, integrity, and significance of the site. Where Native American artifacts have been found or where oral traditions indicate the site was used by Native Americans in the past, research shall be conducted to determine the extent of the archaeological significance of the site.	**Consistent.** As the project site is located within a mapped area of sensitivity, a Phase I cultural resources inventory was conducted by a qualified professional archaeologist in January 1999. An Extended Phase I cultural resources inventory was conducted by a qualified professional archaeologist in March 2011. In addition, an updated cultural resources records search was prepared for the proposed project by Langan Engineering and Environmental Services in June 2025. The Phase I and Extended Phase I investigations included a records search, pedestrian surveys, and consultation with appropriate cultural resource databases. The project site encompasses recorded archaeological site CA-SBA-1735. However, shovel probe testing within the mapped CA-SBA-1735 boundary conducted as part of the Extended Phase I did not reveal any archaeological resources within the project site. The findings of the Phase I cultural resources inventory have been incorporated into the environmental review process, and Mitigation Measures CUL-1 (Archaeological Monitoring), CUL-2 (Workers Environmental Awareness Program Training), and CUL-3 (Unanticipated Discovery of Cultural Resources) would ensure the protection of unidentified cultural resources.
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 Resources*). The project site encompasses recorded archaeological site CA-SBA-1735. However, shovel probe testing within the mapped CA-SBA-1735 boundary conducted as part of the Extended Phase I did not reveal any archaeological resources within the project site. However, the proposed project could potentially impact unknown archaeological resources and would require implementation of Mitigation Measures CUL-1 through CUL-3, which would require archaeological monitoring (CUL-1), a cultural resources sensitivity meeting for construction personnel (CUL-2), and implementation of appropriate procedures for evaluation and treatment of any discoveries made during construction (CUL-3). These mitigation measures would minimize potential impacts related to the discovery of unanticipated cultural resources during construction of the proposed project.
OS 8.6: Monitoring and Discovery. On-site monitoring by a qualified archaeologist and appropriate Native American observer shall be required for all grading, excavation, and site preparation that involves earth moving operations on sites identified as archaeologically sensitive. If cultural resources of potential importance are uncovered during construction, the following shall occur: a. The grading or excavation shall cease and the City shall be notified. b. A qualified archeologist shall prepare a report assessing the significance of the find and provide recommendations regarding appropriate disposition. c. Disposition will be determined by the City in conjunction with the affected Native American nation.	**Consistent.** Mitigation Measure CUL-1 would require archaeological monitoring during initial ground disturbance activities. Mitigation Measure CUL-3 would require implementation of an unanticipated discovery protocol, including cessation of construction activities, assessment of the findings, and final disposition. Implementation of these mitigation measures would meet the requirements of Policy OS 8.6.

Policy	Project Consistency
OS 8.7: Protection of Paleontological Resources. Should substantial paleontological resources be encountered during construction activities, all work that could further disturb the find shall be stopped and the City of Goleta shall be notified within 24 hours. The applicant shall retain a qualified consultant to prepare a report to the City that evaluates the significance of the find and, if warranted, identifies recovery measures. Upon review and approval of the report by the City, construction may continue after implementation of any identified recovery measures.	**Consistent.** Mitigation Measure GEO-2 would require paleontological monitoring during ground disturbing activities and sets forth standard procedures in the event of a fossil discovery by the paleontological monitor or construction personnel, including stopping work within 50 feet of the find, evaluation of the significance of the find, and salvage and recovery.
OS 9.2 Mitigation of Impacts of New Development on Parks and Recreation Facilities. The following shall apply to approvals of new development projects: a. To ensure new development pays a proportionate share of the cost of acquisition and improvement of parks, recreation facilities, and open space, the City shall require a one-time impact fee to offset costs necessary to accommodate the development. These fees shall be used for acquiring and/or developing new or improving/rehabilitating existing park, recreation, or open space facilities. b. At its discretion, the City may allow any appropriate park and recreational facilities provided within a development to meet all or part of the mitigation requirement in lieu of payment of a portion of the impact fee only if they are open and accessible to the public. c. Within new subdivisions, where the City may allow dedications of land in lieu of payment of fees pursuant to California Government Code Section 66477 (Quimby Act), the land area to be dedicated shall be usable space for active recreation purposes.	**Consistent.** As described in Section 4.0.3.6, *Recreation*, of Chapter 4, *Environmental Impact Analysis*, the project applicant would be required to pay Quimby Act parkland dedication or in-lieu fees, which fund the development and maintenance of parks and recreational facilities.
Conservation Element (CE)	
CE 1.3: Site-Specific Studies and Unmapped ESHAs. Any area not designated on the ESHA map in Figure 4-1 that meets the ESHA criteria for the resources specified in CE 1.1 shall be granted the same protections as if the area was shown on the map. Proposals for development on sites where ESHAs are shown on the map or where there is probable cause to believe that ESHAs may exist shall be required to provide the City with a site-specific biological study that includes the following information: a. A base map that delineates topographic lines, parcel boundaries, and adjacent roads. b. A vegetation map that identifies species that may be indicators of ESHAs. c. A soils map that delineates hydric and nonhydric soils, if applicable. d. A census of animal species that indicates the potential existence of ESHAs. e. A detailed map that shows the conclusions regarding the boundary, precise location and extent, or current status of the ESHA based on substantial evidence provided in the biological studies.	**Consistent.** As described in Section 4.3, *Biological Resources*, there is unmapped black sage-California sagebrush scrub vegetation meeting criteria to be classified as an ESHA because it is a type of coastal sage scrub vegetation and contains rare Santa Barbara honeysuckle plants. The *Logical Assessment Report for the Shelby Residential Development Project* (Appendix D) constitutes site-specific biological studies that include the required information listed in Policy CE 1.3.

Policy	Project Consistency
CE 1.5 Corrections to Map of ESHAs. If a site-specific biological study, prepared consistent with subpolicy CE 1.3, contains substantial evidence that an area previously shown as an ESHA on Figure 4-1 (and Figure 3-5) does not contain habitat that meets the definition of an ESHA for reasons, other than that set forth in CE 1.4, or an area not shown as ESHA on Figure 4-1 (and Figure 3-5) that meets the definition of an ESHA, the Planning Commission, or the City Council if it is otherwise the Review Authority for the underlying project under Title 17 of the Goleta Municipal Code, shall make a finding based on substantial evidence as part of the project approval regarding the physical extent of the ESHA and detailed justification for revisions at the project site. If the Planning Commission, or the City Council if it is otherwise the Review Authority for the underlying project under Title 17 of the Goleta Municipal Code, finds that a change in the mapped ESHA is warranted, a map revision shall be included in the next General Plan/Coastal Land Use Plan ESHA map amendment as detailed below. In cases of removal of mapped ESHA, the General Plan/Coastal Land Use Plan policies and standards for protection of ESHAs shall not apply, and approval of development consistent with all other requirements of the General Plan/Coastal Land Use Plan may be considered prior to the map revision. At a minimum, Figure 4-1 (and Figure 3-5) shall be reviewed and updated every five years to reflect currently available information, including up-to-date information on locations of rare, threatened, or endangered species or habitats; changes made in project approval decisions; and changes due to rising sea level.	**Consistent.** As described in Section 4.3, *Biological Resources*, there is unmapped black sage-California sagebrush scrub vegetation meeting criteria to be classified as an ESHA because it is a type of coastal sage scrub vegetation and contains rare Santa Barbara honeysuckle plants. The *Logical Assessment Report for the Shelby Residential Development Project* (Appendix D) provides substantial evidence for the inclusion of the California sagebrush scrub vegetation as ESHA.
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.	**Consistent.** The proposed project would directly impact native vegetation, including ESHA, in four areas: installation of a new storm drain pipe in the southwestern corner of the project site; construction of a new bike path along Cathedral Oaks Road; grading in the southwestern corner of the project site to construct the detention basin; and grading and building construction within the eucalyptus grove along El Encanto Creek. The proposed project would impact approximately 9,081 square feet (0.21 acre) of ESHA. The proposed project may result in direct impacts to ESHA and would require the implementation of Mitigation Measures BIO-3 (Habitat Restoration and Rare Plant Mitigation), BIO-4 (Biological Monitoring and Worker Education), and BIO-7 (Protection of Environmentally Sensitive Habitat Areas). Following the implementation of Mitigation Measures BIO-3, BIO-4, and BIO-7, the proposed project's impact involving a substantial adverse effect on riparian habitat and sensitive vegetation communities would be less than significant with mitigation incorporated. Following the implementation of Mitigation Measures BIO-3, BIO-4, and BIO-7, the proposed project would be consistent with Policy CE 1.6.

Policy	Project Consistency
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.	
CE 1.8: ESHA Buffers. Development adjacent to an ESHA shall minimize impacts to habitat values or sensitive species to the maximum extent feasible. Native vegetation shall be provided in buffer areas to serve as transitional habitat. All buffers shall be of a sufficient size to ensure the biological integrity and preservation of the ESHA they are designed to protect.	**Consistent.** As discussed in Section 4.3, *Biological Resources*, proposed activities within the ESHA buffer include the installation of a new storm drain pipe, construction of a new bike path along Cathedral Oaks Road, grading in the southwest corner of the project site to construct the detention basin, and grading and building construction within eucalyptus grove along El Encanto Creek. As designed, the proposed activities would minimize impacts to habitat values or sensitive species to the maximum extent feasible via the proposed design of these elements. Nevertheless, the proposed project may result in direct impacts to ESHA and would require the implementation of Mitigation Measures BIO-3 (Habitat Restoration and Rare Plant Mitigation), BIO-4 (Biological Monitoring and Worker Education), and BIO-7 (Protection of Environmentally Sensitive Habitat Areas). These mitigation measures would ensure the biological integrity of ESHA on and adjacent to the project site is preserved.

Policy	Project Consistency
CE 1.9: Standards Applicable to Development Projects. 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 for parcels within or adjacent to an ESHA shall only be allowed if each new lot being created, except for open space lots, is capable of being developed without building in any ESHA or ESHA buffer and without any need for impacts to ESHAs related to fuel modification for fire safety purposes. 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, for fire safety in order to preserve native and/or nonnative supporting habitats. Development shall use fire resistant materials and incorporate alternative measures, such as firewalls and landscaping techniques, that will reduce or avoid fuel modification activities. h. The timing of grading and construction activities shall be controlled to minimize potential disruption of wildlife during critical time periods such as nesting or breeding seasons. i. Grading, earthmoving, and vegetation clearance adjacent to an ESHA shall be prohibited during the rainy season, generally from November 1 to March 31, except as follows: 1) where erosion control measures such as sediment basins, silt fencing, sandbagging, or installation of geofabrics have been incorporated into the project and approved in advance by the City; 2) where necessary to protect or	**Inconsistent.** As discussed in Section 4.3, *Biological Resources*, the proposed project would not substantially affect wildlife corridors or habitat networks with implementation of Mitigation Measure NOI-1, which would minimize construction noise in compliance with existing City noise standards which are set to a threshold below noise levels known to produce adverse physiological effects in wildlife. Proposed project landscaping would include an assortment of native and non-invasive screen shrubs, accent trees, and canopy trees which would result in the preservation of native habitats as feasible. Implementation of best management practices from the Storm Water Pollution Prevention Plan would involve erosion control practices throughout the project site, which would minimize overall grading on-site and grading impacts to ESHA. Proposed project lighting would be designed in accordance with City standards, which require 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. As described in Section 4.14, *Wildfire*, the project would be designed and constructed with fire-resistant material pursuant to the requirements of the California Building Code and California Residential Code. Fuel modification activities would be minimized with implementation of the proposed project's landscape plan, which prohibits the use of highly flammable plant species identified in SBCFD development standards and instead incorporates irrigated, fire-resistant landscaping around dwelling units and common areas. Construction activities would minimize potential disruption during nesting bird season through implementation of Mitigation Measure BIO-7 requiring pre-construction nesting bird surveys and avoidance of nesting birds. The proposed project involves a subdivision for a residential neighborhood, and proposed project construction activities would encroach on ESHA buffers which would be inconsistent with Policy CE 1.9(b) which permits land divisions for parcels within or adjacent to ESHA only if each new lot being created is capable of being developed without building into any ESHA or ESHA buffer. However, as described in Section 4.3, *Biological Resources*, the environmental impacts of development within ESHA buffers would be reduced to a less than significant level with implementation of Mitigation Measures BIO-3, BIO-4, and BIO-7. Mitigation Measures BIO-4 and BIO-7 would reduce potential indirect impacts to riparian ESHA during project construction by requiring fencing around ESHA (BIO-7) and biological monitoring during construction and construction worker environmental awareness training (BIO-4). Mitigation Measure BIO-3 would reduce potential permanent impacts to ESHA and aquatic resources by requiring compensatory mitigation for habitat loss due to project development.

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enhance the ESHA itself; or 3) where necessary to remediate hazardous flooding or geologic conditions that endanger public health and safety. j. In areas that are not adjacent to ESHAs, where grading may be allowed during the rainy season, erosion control measures such as sediment basins, silt fencing, sandbagging, and installation of geofabrics shall be implemented prior to and concurrent with all grading operations.	
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 El Encanto Creek, and the associated riparian areas as ESHA, and analyzes project impacts to those ESHA areas. The proposed project would be consistent with the provisions of Policy CE 2.1, as discussed in the consistency analyses for Policies CE 2.2, 2.3, and 2.5.
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.	**Consistent.** The proposed project includes a request for the City of Goleta to approve a reduction in the required 100-foot-wide SPA upland buffer, as established by General Plan/Coastal Land Use Plan Policy CE 2.2 and Goleta Municipal Code Section 17.30.040. The request would allow the following activities within the SPA: ▪ 7,786 square feet of proposed residential development; ▪ Trenching for a new, 90-foot-long storm drain pipe; ▪ 11,283 square feet of proposed stormwater detention; and ▪ A meandering path, landscaping, and 65 linear feet of sidewalk. General Plan/Coastal Land Use Plan Policy CE 2.2 and Goleta Municipal Code Section 17.30.040 allow for site-specific reductions to the 100-foot buffer under limited circumstances. A reduction may be granted only if the following two criteria are met: 1. No feasible alternative siting for development exists that would avoid encroachment into the SPA upland buffer; and 2. The proposed development would not result in significant adverse effects on streamside vegetation or the biotic quality of the stream The residential development and associated grading within the SPA buffer, including portions of Lots 1 through 8, are not resource-dependent uses. However, the proposed encroachment of residential structures and grading into the 100-foot SPA upland buffer meets the two-part test for buffer reduction under General Plan/Coastal Land Use Plan Policy CE 2.2 and Goleta Municipal Code Section 17.30.040, as follows: ▪ No Feasible Alternative Siting. The proposed project would include affordable housing, and the project applicant would utilize a waiver under State Density Bonus Law (Government Code Section 65915) to modify local development standards, including SPA buffer requirements. The waiver is necessary to accommodate the density and configuration of the project. Site constraints, including the location of El

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	Encanto Creek and other environmental setbacks, limit the developable area. Relocating the affected residential structures outside the SPA buffer would reduce the number of units or compromise site functionality, thereby conflicting with the project's objectives to develop up to 56 residential units, expand the City's housing stock consistent with the adopted 2023–2031 Housing Element, and provide housing opportunities for extremely low, lower, and moderate income households to support compliance with Regional Housing Needs Allocation requirements. Therefore, no feasible alternative siting exists that would avoid buffer encroachment while meeting the project's land use and housing objectives. ▪ No Significant Adverse Effects on Streamside Resources. The encroachments would be limited in scale and would primarily occur outside the creek channel and riparian vegetation. The project would include stormwater management features (e.g., detention basin) that reduce runoff and protect water quality. Construction would include the implementation of BMPs to minimize erosion and sedimentation in accordance with the National Pollutant Discharge Elimination System Construction General Permit. As designed, the proposed project would not significantly degrade streamside vegetation, hydrology, or habitat quality. Therefore, the proposed encroachments are consistent with General Plan/Coastal Land Use Plan Policy CE 2.2 and Goleta Municipal Code Section 17.30.070.
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.	**Inconsistent.** As discussed in Section 4.3, *Biological Resources*, the proposed project would result in the following activities within the SPA: ▪ 7,786 square feet of proposed residential development; ▪ Trenching for a new, 90-foot-long storm drain pipe; ▪ 11,283 square feet of proposed stormwater detention; and ▪ A meandering path, landscaping, and 65 linear feet of sidewalk. The stormwater infrastructure, meandering path, and sidewalk, are considered allowable uses pursuant to Policy CE 2.3 and would be covered by items (d) and (e), respectively. However, the residential development does not apply as an allowable use pursuant to Policy CE 2.3, Therefore, the proposed project would be potentially inconsistent with this policy. However, the proposed project is utilizing the "Builder's Remedy" provisions of the California Housing Accountability Act. In any case, while the proposed project would be inconsistent with Policy CE 2.3, such conflict does not inherently result in a significant environmental impact under CEQA. CEQA significance is determined by whether a conflict with a plan would lead to a substantial adverse physical change in the environment. In this case, the inconsistency is limited to the type of development (i.e.,

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	residential use) rather than the extent or severity of physical impacts, which are addressed through mitigation measures and site design. The proposed development within the SPA buffer has been sited and designed to minimize impacts to riparian vegetation and would not result in significant degradation of streamside habitat or hydrology. Therefore, the proposed project's impact involving conflicts with policies related to Policy CE 2.3 would be less than significant.
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 proposed project would not diminish the natural drainage course of El Encanto Creek. The detention basin and storm drain pipe are resource-dependent utilities designed to manage stormwater runoff and reduce downstream erosion and flooding. These components have been sited to avoid significant adverse effects on streamside vegetation and the biotic quality of El Encanto Creek. As a Condition of Approval, the City of Goleta would require the project applicant to coordinate with CDFW and the Central Coast RWQCB and obtain applicable permits (e.g., Lake and Streambed Alteration Agreement, 401 Water Qualiy Certification) as determined appropriate by the resource agencies, for potential impacts to riparian vegetation. The encroachment into the SPA would be limited in scale and would occur outside the creek channel. The proposed project would include stormwater management features (e.g., detention basin) that reduce runoff and protect water quality. Construction would implement best management practices to minimize erosion and sedimentation in accordance with the National Pollutant Discharge Elimination System Construction General Permit. As designed, the proposed project would not significantly degrade streamside vegetation, hydrology, or habitat quality. The proposed project would be consistent with the provisions of Policy CE 2.5.

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Policy CE 5.3: Protection of Coastal Bluff Scrub, Coastal Sage Scrub, and Chaparral ESHA. In addition to the provisions of Policy CE 1, the following standards shall apply: a. For purposes of this policy, coastal bluff scrub is defined as scrub habitat occurring on exposed coastal bluffs. Example species in bluff scrub habitat include Brewer's saltbush (*Atriplex lentiformis*), lemonade berry (Rhus integrifolia), seashore blight (*Suaeda californica*), seacliff buckwheat (*Eriogonum parvifolium*), California sagebrush (Artemisia californica), and coyote bush (Baccharis pilularis). 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. Chaparral is defined as fire- and drought-adapted woody, evergreen shrubs generally occurring on hills and lower mountain slopes. 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. b. To the maximum extent feasible, development shall avoid impacts to coastal bluff scrub, coastal sage scrub, or chaparral habitat that is part of a wildlife movement corridor and the impact would preclude animal movement or isolate ESHAs previously connected by the corridor such as (1) disrupting associated bird and animal movement patterns and seed dispersal, and/or (2) increasing erosion and sedimentation impacts to nearby creeks or drainages. c. Measures to stabilize impacts to coastal bluff scrub, coastal sage scrub, and chaparral ESHAs shall be minimized by providing at least a 25-foot buffer restored with native species. d. Removal of nonnative and invasive exotic species shall be allowed; revegetation shall be with plants or seeds collected within the same watershed whenever feasible.	**Consistent.** As described in Section 4.3, *Biological Resources,* the proposed project would permanently impact 9,081 square feet (0.21 acre) of arroyo willow thicket, black sage – California sagebrush scrub, and raptor roosting habitat ESHA during construction. However, Mitigation Measure BIO-7 would require the installation of construction fencing along the outer edge of the arroyo willow thicket, black sage-California sagebrush scrub, and raptor roosting habitat ESHA which would provide buffer areas to preserve the black sage-California sagebrush scrub. In addition, Mitigation Measure BIO-3 would require compensatory mitigation for habitat loss due to project development. With implementation of Mitigation Measures BIO-3 and BIO-7, the proposed project would avoid impacts to black sage-California sagebrush scrub to the maximum extent feasible. Following the implementation of Mitigation Measures BIO-3 and BIO-7, the proposed project would be consistent with Policy CE 5.3.

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CE 8.1: ESHA Designation. Requisite habitats for individual occurrences of special-status plants and animals, including candidate species for listing under the state and federal endangered species acts, California species of special concern, California Native Plant Society List 1B plants, and other species protected under provisions of the California Fish and Game Code shall be preserved and protected, and their occurrences, including habitat requirements, shall be designated as ESHAs. These habitats include, but are not limited to, the following: a. Special-status plant species such as Santa Barbara honeysuckle (*Lonicera subspicata var. subspicata),* southern tarplant (*Centromadia parryi ssp. australis*) and black-flowered figwort (*Scrophularia atrata*). b. Habitat capable of supporting special-status invertebrate species, such as the globose dune beetle (*Coelus globosus*), and roosting habitat for the monarch butterfly. c. Aquatic habitat capable of supporting special-status fish species such as the steelhead trout (*Oncorhynchus mykiss*) and tidewater goby (*Eucyclogobius newberryi*). d. Habitat capable of supporting special-status amphibians and reptiles such as the red-legged frog (*Rana aurora draytonii*) and western pond turtle (*Clemmys marmorata pallida*). e. Nesting and roosting areas for various species of raptors such as Cooper's hawks (*Accipiter cooperii*), red-tailed hawks (*Buteo jamaicensis*), white-tailed kites (*Elanus leucurus*), and turkey vultures (*Cathartes aura*). f. Nesting habitat for other special-status bird species such as western snowy plover, southwestern willow flycatcher (*Empidonax traillii extimus*), loggerhead shrike (*Lanius ludovicianus*), yellow warbler (*Dendroica petechia*), or tri-colored blackbird (*Agelaius tricolor*). g. Nesting and foraging habitat for special-status mammals such as pallid bat (*Antrozous pallidus*), western red bat (*Lasiurus blossevillii*), Yuma myotis (*Myotis yumanensis*), and American badger (*Taxidea taxus*).	**Consistent.** The CEQA analysis included in Section 4.3, *Biological Resources*, evaluates ESHA within the definition provided in this 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 proposed 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-5 in Section 4.3, *Biological Resources*, implementation of Mitigation Measures BIO-1 through BIO-8 would ensure that impacts to special-status species and their habitat areas are minimized.

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CE 8.3: Site-Specific Biological Resources Study. Any areas not designated on Figure 4-1 that meet the ESHA criteria for the resources specified in CE 8.1 shall be accorded the same protections as if the area were shown on the figure. Proposals for development on sites where ESHAs are shown on the figure, or where there is probable cause to believe that an ESHA may exist, shall be required to provide the City with a site-specific biological study that includes the following information: a. A base map that delineates topographic lines, parcel boundaries, and adjacent roads. b. A vegetation map that 1) identifies trees or other sites that are existing or historical nests for the species of concern and 2) delineates other elements of the habitat such as roosting sites and foraging areas. c. A detailed map that shows the conclusions regarding the boundary, precise location and extent, or current status of the ESHA based on substantial evidence provided in the biological studies. d. A written report that summarizes the survey methods, data, observations, findings, and recommendations.	**Consistent.** The proposed project would consist of development on a site containing ESHA as identified in Figure 4-1 of the City's General Plan. The *Biological Assessment Report for the Shelby Residential Development Project* prepared by Watershed Environmental, Inc. in September 2025 constitutes a site-specific biological study that includes the required information listed in Policy CE 8.3.
CE 8.4: Buffer Areas for Raptor Species. Development shall be designed to provide a 100-foot buffer around active and historical nest sites for protected species of raptors when feasible. In existing developed areas, the width of the buffer may be reduced to correspond to the actual width of the buffer for adjacent development. If the biological study described in CE 8.3 determines that an active raptor nest site exists on the subject property, whenever feasible no vegetation clearing, grading, construction, or other development activity shall be allowed within a 300-foot radius of the nest site during the nesting and fledging season.	**Consistent.** Some of the eucalyptus trees adjacent to the project site are large and have the potential to be used by owls and other raptors to roost and/or nest, and as such, the trees in this eucalyptus grove are subject to the special-status species protection policies contained in this policy. As discussed under Impact BIO-1 in Section 4.3, *Biological Resources*, implementation of Mitigation Measure BIO-6 would reduce potential impacts to nesting birds and raptors by requiring pre-construction surveys and avoidance measures, including implementation of a 300-foot buffer from nest sites.
CE 9.1: Definition of Protected Trees. New development shall be sited and designed to preserve the following species of native trees: oaks (*Quercus* spp.), walnut (*Juglans californica*), sycamore (*Platanus racemosa*), cottonwood (*Populus* spp.), willows (*Salix* spp.), or other native trees that are not otherwise protected in ESHAs, unless as otherwise allowed in CE 9.	**Consistent**. Three native coast live oak trees are located on the Glen Annie Golf Course adjacent to the project site's western boundary. The canopies and/or critical root zones of these trees extend onto the project site. Two of these trees are growing beneath the canopy of olive and blue gum eucalyptus and one tree is growing in black sage-California sagebrush scrub ESHA vegetation. All three of these trees are protected under the City of Goleta General Plan/Coastal Land Use Plan. As discussed under Impact BIO-5 in Section 4.3, *Biological Resources*, the proposed project would not involve removal of these trees, and implementation of Mitigation Measure BIO-8 would reduce potential impacts to protected trees by requiring implementation of tree protection measures during project construction activities.

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CE 9.5: Mitigation of Impacts to Native Trees. Where the removal of mature native trees cannot be avoided through the implementation of project alternatives or where development encroaches into the protected zone and could threaten the continued viability of the tree(s), mitigation measures shall include, at a minimum, the planting of replacement trees on site, if suitable area exists on the subject site, or offsite if suitable onsite area is unavailable, consistent with the Tree Protection Ordinance (see also CE-IA-4). The Tree Protection Ordinance shall establish the mitigation ratios for replacement trees for every tree removed. Where onsite mitigation is not feasible, offsite mitigation shall be provided by planting of replacement trees at a site within the same watershed. If the tree removal occurs at a site within the Coastal Zone, any offsite mitigation area shall also be located within the Coastal Zone. Minimum sizes for various species of replacement trees shall be established in the Tree Protection Ordinance. Mitigation sites shall be monitored for a period of 5 years. The City may require replanting of trees that do not survive.	**Consistent.** As discussed under Impact BIO-5 in Section 4.3, *Biological Resources*, the proposed project would not involve direct removal of protected trees, but construction activities within their critical root zones could result in indirect impacts, such as soil compaction or root damage, if appropriate protection measures are not implemented. Mitigation Measure BIO-8 would reduce potential impacts to protected trees by requiring implementation of tree protection measures during project construction activities. As mitigated, the proposed project would be consistent with the City of Goleta's General Plan/Coastal Land Use Plan Policy CE 9.5 as well as the City's Urban Forest Management Plan.
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 of the EIR was made available to state and local agencies, including the Santa Barbara County Air Pollution Control District, to comment and provide recommendations. The Revised Draft EIR will be made available to the Santa Barbara County Air Pollution Control District during the public review period. The proposed project would use the best available air pollution control technology and ensure equipment is properly maintained. The proposed project is not directly adjacent to sensitive receptors, and as described in Section 4.2, *Air Quality*, the project applicant has committed to using Tier 4 construction equipment to minimize emissions which would adequately minimize the potential for construction emissions to expose receptors to substantial pollutant concentrations at the buffer distance of 65 feet from the nearest receptor. Additionally, the proposed project would not require a permit from the Santa Barbara County Air Pollution Control District.
CE 12.3 Control of Emissions during Grading and Construction: Construction site emissions shall be controlled by using the following measures: ▪ Watering active construction areas to reduce windborne emissions. ▫ Covering trucks hauling soil, sand, and other loose materials. ▫ Paving or applying nontoxic solid stabilizers on unpaved access roads and temporary parking areas. ▫ Hydroseeding inactive construction areas. ▫ Enclosing or covering open material stockpiles. ▫ Revegetating graded areas immediately upon completion of work.	**Consistent.** The proposed project would minimize construction site emissions through watering construction areas and covering trucks hauling soil. After clearing, grading, earth moving or excavation is completed, the disturbed area would 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 would not occur. All driveways and sidewalks to be paved/surfaced would be completed as soon as possible and would occur in accordance with Santa Barbara County Air Pollution Control District Rule 329 which limits the use of asphalt with high levels of reactive organic compound emissions. As described in Section 4.8, *Hydrology and Water Quality*, implementation of best management practices required as part of the Storm Water Pollution Prevention Plan would prevent erosion and dust generation in inactive construction areas and

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	stockpile areas. Following the completion of construction, the project site would be revegetated with native landscaping. As described in Section 4.2, *Air Quality*, the project applicant has committed to using Tier 4 construction equipment to minimize emissions.
CE 13.1: Energy Efficiency in Existing and New Residential Development. The City shall promote the following practices in existing and new residential construction: a. Retrofitting of existing residential structures to reduce energy consumption and costs to owners and tenants is encouraged. These retrofits may include: increased insulation, weather stripping, caulking of windows and doors, low-flow showerheads, and other similar improvements. Master metering is discouraged, and conversions to individual metering where practicable is preferred. 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. New residential development and additions to existing homes shall be designed to provide a maximum solar orientation when appropriate, and shall not adversely affect the solar access of adjacent residential structures. Use of solar water heating systems, operational skylights, passive solar heating, and waste heat recovery systems is encouraged.	**Consistent.** As described in Section 4.0.3.2, *Energy*, of Chapter 4, *Environmental Impact Analysis*, proposed project design and construction would comply with standards set in California Building Code Title 24, which require implementation of energy-efficient light fixtures, building materials, and heating, ventilation, and air conditioning equipment. The proposed design of the residences would include solar photovoltaic systems pursuant to the requirements of California Building Code Title 24, Part 6. Adherence to these standards would ensure the proposed project would minimize energy consumption in the new residences.
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.	**Consistent**. As described in Section 4.0.3.2, *Energy*, of Chapter 4, *Environmental Impact Analysis*, the proposed project would obtain electricity from Southern California Edison or Central Coast Community Energy. In accordance with Senate Bill (SB) 100, Southern California Edison is required to increase renewable energy procurement to 60 percent by 2030, and 100 percent by 2045. Central Coast Community Energy procures electricity from renewable resources and has an overarching goal of sourcing 100 percent clean energy by 2030. Additionally, the proposed design of the residences would include solar photovoltaic systems pursuant to the requirements of California Building Code Title 24, Part 6. Therefore, the proposed project would utilize renewable energy sources, and would not impair the performance of existing solar energy systems.

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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.** As discussed in Chapter 2, *Project Description*, the proposed project's landscaping irrigation equipment would include a combination of low-volume spray heads, bubblers, and drip systems which would be controlled by an automatic timer with a seasonal adjustment to apply less water during the rainy season. The proposed residences would include water efficient appliances to reduce water consumption for plumbing consistent with the latest Title 24 Green Building Code and Building Energy Efficiency Standards, including the installation of low-flow plumbing fixtures. Therefore, the proposed project would minimize water use.
Safety Element (SE)	
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 4.5, *Geology and Soils*, the technical document that informed project design and the environmental analysis is the *Preliminary Geotechnical Report* prepared by ENGEO (Appendix E). This study evaluates geologic hazards that may affect the project site, determined that the project site was suitable for the proposed renovation, and provided recommendations to mitigate potential geologic impacts.
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 new buildings that would comply with the City's adopted building and fire codes.
SE 1.9: Reduction of Radon Hazards. The City shall require the consideration of radon hazards for all new construction and require testing of radon levels for construction of homes and buildings located in areas subject to moderate or high potential for radon gas levels exceeding 4.0 picocuries as shown on maps produced by the California Division of Mines and Geology. The City shall require new homes to use radon-resistant construction where needed based on U.S. Environmental Protection Agency guidelines.	**Consistent.** In accordance with City requirements, methods for radon control outlined in the American Association of Radon Scientists and Technologists and American National Standards Institute would be implemented into project design.
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.** As stated in Section 4.5, *Geology and Soils*, the technical document that informed project design and the environmental analysis is the *Preliminary Geotechnical Report* prepared by ENGEO (Appendix E). This study evaluates geologic hazards that may affect the project site, determined that the project site was suitable for the proposed renovation, and provided recommendations to mitigate potential geologic impacts.

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SE 4.4: Setback from Faults. New development shall not be located closer than 50 feet to any active or potentially active fault line to reduce potential damage from surface rupture. Nonstructural development may be allowed in such areas, depending on how such nonstructural development would withstand or respond to fault rupture or other seismic damage.	**Consistent.** As discussed in Section 4.5, *Geology and Soils*, no active faults are mapped across the project site and therefore new development would not be located 50 feet from any active or potentially active fault lines.
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.** Residential development would not encroach on the 50-foot setback from El Encanto Creek. The proposed project would include stormwater infrastructure and landscaping within the 50-foot setback from El Encanto Creek; however, these components would not increase flood risk. As described in Section 4.8, *Hydrology and Water Quality*, the project site is not located within a flood hazard zone and would not expose residents to risk associated with flooding.
SE 7.1: Fire Prevention and Response Measures for New Development. New development and redevelopment projects shall be designed and constructed in accordance with National Fire Protection Association standards to minimize fire hazards, with special attention given to fuel management and improved access in areas with higher fire risk, with access or water supply deficiencies, or beyond a 5-minute response time.	**Consistent.** As described in Section 4.14.2, *Regulatory Setting,* of Section 4.14, *Wildfire,* the proposed project would be designed and constructed in accordance with National Fire Protection Association Standards identified by this policy, which are enforced by the City through Section 17.32.060 of the Municipal Code.
SE 7.2: Review of New Development. Applications for new or expanded development shall be reviewed by appropriate Santa Barbara County Fire Department personnel to ensure they are designed in a manner that reduces the risk of loss due to fire. Such review shall include consideration of the adequacy of "defensible space" around structures at risk; access for fire suppression equipment, water supplies, construction standards; and vegetation clearance. Secondary access may be required and shall be considered on a case-by-case basis. The City shall encourage built-in fire suppression systems such as sprinklers, particularly in high-risk or high-value areas.	**Consistent.** As described in Section 4.14.3, *Impact Analysis,* of Section 4.14, *Wildfire, p*roject plans would be reviewed by Santa Barbara County Fire Department personnel to ensure they are designed in a manner that reduces the risk of loss due to fire.
SE 7.4: Fuel Modification Plans. Applications for new development that require fuel modification shall include a Fuel Modification Plan for the project. This plan shall be prepared by a landscape architect or resource specialist and shall include measures to minimize removal of native vegetation, minimize disturbance to environmentally sensitive habitat areas (ESHAs), and incorporate fire-retardant vegetation in new plantings. Such plans shall be reviewed and approved by the Santa Barbara County Fire Department.	**Consistent.** As described in Section 4.14, *Wildfire*, the proposed project includes a landscape plan which meets the requirements of a Fire Fuel Modification Plan. Project plans would be reviewed by Santa Barbara County Fire Department personnel to ensure they are designed in a manner that reduces the risk of loss due to fire.

Policy	Project Consistency
SE 7.5: Standards for Rebuilding in High Fire Hazard Areas. Any rebuilding in high fire hazard areas shall incorporate development standards and precautions that reduce the chance of structure losses from fire.	**Consistent.** The proposed project would be designed in accordance with Chapter 9, Fire Protection Systems, of the California Building Code, which includes specific standards related to exterior wildfire exposure, California Code of Regulations Title 14, and California Residential Code Section R337, which sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. Specifically, the proposed project would comply with requirements set forth for roof coverings, vents, residential sprinklers, ignition-resistant construction materials, decking, and exterior windows, skylights, and doors. This would reduce the ignitability of the structures constructed on the project site.
SE 7.6 Implementation of the Community Wildfire Protection Plan. The City shall implement the Goleta Community Wildfire Protection Plan (CWPP), as may be amended, to enhance community wildfire protection.	**Consistent.** The proposed project's design and construction would occur in accordance with vegetation management guidance from the CWPP, including following defensible space requirements set forth in California Public Resources Code Section 4291 and utilizing fuel treatment strategies such as mowing and thinning vegetation to reduce the risk of wildfire.
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 described in Section 4.7, *Hazards and Hazardous Materials*, the storage, handling, and disposal of hazardous materials would occur in compliance with applicable federal and state regulations established by United States Environmental Protection Agency and the State of California, including the Hazardous Material Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Materials Management Act, and California Code of Regulations Title 22.
Visual and Historic Resources Element (VH)	
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.	**Consistent.** As discussed in Section 4.1, *Aesthetics and Visual Resources*, the proposed project, foothill and mountain views from the Cathedral Oaks Road Scenic Corridor are considered a significant visual resource. The design of the proposed project would not result in buildings of substantial height or landscaping intended to screen the entirety of the project site. Views of the surrounding foothills and mountains would continue to be available to the public.

Policy	Project Consistency
VH 1.2: Scenic Resources Map. The Scenic Resources Map in Figure 6-1 identifies locations on public roads, trails, parks, open spaces, and beaches that serve as public vantage points for viewing scenic resources. Views from these locations shall be protected by minimizing any impairment that could result from new development.	**Consistent.** The project site is obscured from locations identified in Figure 6-1. The design of the proposed project would not result in buildings with substantial height or landscaping intended to screen the entirety of the project site. Views identified in Figure 6-1 would continue to be available to the public.
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.** As discussed in Section 4.1, *Aesthetics and Visual Resources*, the proposed project, foothill and mountain views from the Cathedral Oaks Road Scenic Corridor are considered a significant visual resource. The design of the proposed project would not result in buildings of substantial height or landscaping intended to screen the entirety of the project site. Views of the surrounding foothills and mountains would continue to be available to the public.
VH 1.5: Protection of Open Space Views. Views of open space, including agricultural lands, from public areas shall be protected. View protection associated with development 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 impacts to these scenic resources, the following development practices shall be used, where appropriate: a. Limitations on the height and size of structures. b. Clustering of building sites and structures. c. Shared vehicular access to minimize curb cuts.	**Consistent.** As discussed in Section 4.1, *Aesthetics and Visual Resources*, design of the proposed project would not result in buildings with substantial height or landscaping intended to screen the entirety of the project site. Views of the surrounding open space to the north of the project site would continue to be available to the public.

Policy	Project Consistency
d. Downcast, fully shielded, full cut off lighting of the minimum intensity needed for the purpose. e. Use of landscaping for screening purposes and/or minimizing view blockage as applicable. f. Selection of colors and materials that harmonize with the surrounding landscape	
VH 1.6: Preservation of Natural Landforms. Natural landforms shall be protected. Protection associated with development should be accomplished first through site selection to protect natural landforms and then by use of alternatives that enhance and incorporate natural landforms in the design. To minimize alteration of natural landforms and ensure that development is subordinate to surrounding natural features such as mature trees, native vegetation, drainage courses, prominent slopes, and bluffs, the following development practices shall be used, where appropriate: a. Limit grading for all development including structures, access roads, and driveways. Minimize the length of access roads and driveways and follow the natural contour of the land. b. Blend graded slopes with the natural topography. c. On slopes, step buildings to conform to site topography. d. Minimize use of retaining walls. e. Minimize vegetation clearance for fuel management. f. Cluster building sites and structures. g. Share vehicular access to minimize curb cuts.	**Consistent**. The proposed project includes open space areas that would serve as natural lands on the project site. Grading activities would be limited to what is necessary to construct the proposed project. Retaining walls are not proposed as part of project design. The proposed driveways would result in minimal curb cuts on Cathedral Oaks Road in conformance with City standards for driveways. The proposed project's landscaping would be comprised of an assortment of native and non-invasive screen shrubs, accent trees, and canopy trees to promote the natural landscape of the project area.
VH 1.8: Private Views. Project development and architecture shall be considerate of private views.	**Consistent**. Private viewpoints from multifamily residences west of the project site, beyond El Encanto Creek and Northgate Drive, are screened by the existing trees and vegetation along El Encanto Creek and the project site is not visible. The proposed project would not interfere with private views.
VH 2.1: Designated Scenic Corridors. The Scenic Resources Map in Figure 6-1 identifies corridors that pass through, or provide visual access to, areas of high scenic value. These corridors, or segments of corridors, include but are not limited to the following: a. U.S. 101 b. Cathedral Oaks Road c. Hollister Avenue d. Los Carneros Road e. Fairview Avenue f. Calle Real	**Consistent.** As stated in Section 4.1, *Aesthetics and Visual Resources*, the project site is located adjacent to the Cathedral Oaks Road Scenic Corridor, and foothill and mountain views from the Cathedral Oaks Road Scenic Corridor are considered a significant visual resource. The design of the proposed project would not result in buildings of substantial height or landscaping intended to screen the entirety of the project site. Views of the surrounding foothills and mountains would continue to be available to the public.

Policy	Project Consistency
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.	**Consistent.** Refer to the consistency analyses for Policies VH 1.1, 1.2, 1.4, and 2.1 related to how the proposed project would not interfere with views of significant natural features, the ocean, mountains and foothills, and open space. The proposed project would not substantially screen views of natural features.
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.	**Consistent.** Refer to the consistency analysis for Policy VH 2.1 related to how the proposed project would not degrade or obstruct views of areas along the Cathedral Oaks Road Scenic Corridor.

Policy	Project Consistency
VH 2.4: Public Improvements. Public improvements visible from scenic corridors including landscaping, street lighting, signage, medians, noise attenuation walls, and other hardscape elements shall include a high level of design through appropriate detailing and use of high quality, durable materials.	**Consistent**. The proposed project would include landscape enhancements on the southern border of the project site, visible from Cathedral Oaks Road. The proposed landscaping would promote the natural landscape of the project area and would not degrade views from the scenic corridor.
VH 2.5: Linkages between Scenic Areas. Corridors of high scenic value should be linked with adjacent public recreation areas such as parks and trails where feasible.	**Consistent.** The proposed project would include an extension of a Class I trail adjacent to Cathedral Oaks Road that would offer views of the foothills and mountains to the north.
VH 3.3: Site Design. The city's visual character shall be enhanced through appropriate site design. Site plans shall provide for buildings, structures, and uses that are subordinate to the natural topography, existing vegetation, and drainage courses; adequate landscaping; adequate vehicular circulation and parking; adequate pedestrian circulation; and provision and/or maintenance of solar access.	**Consistent**. The proposed project's design would include visually appealing and unintrusive design, green building practices, and appropriate landscaping in all proposed development, including the residences, associated parking lots, internal roadways, and open space areas. As described in Section 4.8, *Hydrology and Water Quality*, the proposed project would not substantially alter the existing drainage pattern of the project site. As described in Section 2.3.7, *Demolition and Grading,* of Chapter 2, *Project Description,* the finished grade elevation of the project site would range from approximately 150 feet above mean sea level to approximately 245 feet above mean sea level, in conformance with the natural varying topography of the surrounding area. Existing vegetation would be maintained as feasible and no tree removal would occur. Landscaping would be comprised of an assortment of native and non-invasive screen shrubs, accent trees, and canopy trees to promote the natural landscape of the project area. The proposed project's internal circulation design would provide sidewalks for pedestrian travel and include extension of an existing Class I trail adjacent to Cathedral Oaks Road that would expand pedestrian circulation infrastructure. As stated in Section 4.0.3.2, *Energy,* of Chapter 4, *Environmental Impact Analysis*, the proposed design of the residences would include solar photovoltaic systems pursuant to the requirements of California Building Code Title 24, Part 6.
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 proposed residences are designed with architectural styles and building colors consistent with surrounding residences and the natural environment. As described in Table 4.9-1, the proposed project would be consistent with building design standards established by the City.
VH 3.5. Pedestrian-Oriented Design. The city's visual character shall be enhanced through provision of aesthetically pleasing pedestrian connections within and between neighborhoods, recreational facilities, shopping, workplaces, and other modes of transportation, including bicycles and transit.	**Consistent.** The proposed project's internal circulation design would provide sidewalks for pedestrian travel and include extension of an existing Class I trail adjacent to Cathedral Oaks Road that would expand pedestrian circulation infrastructure.

Policy	Project Consistency
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, and would not use invasive plants, which would promote the natural landscape of the project area. Implementation of landscaping trees would assist to soften building masses and provide screening along off-street parking areas.
VH 4.10: Streetscape and Frontage Design. A unified streetscape shall be created to improve the interface between pedestrians and vehicles. The following design elements shall be incorporated where feasible: a. Abundant street trees and landscaped medians. b. Landscaping that buffers pedestrians and bicyclists from traffic without creating site distance conflicts. c. Coordination of landscaping within the public right-of-way and adjacent development to provide an integrated street frontage. d. Provision of street furniture including benches, planter seating, trash containers, and pedestrian scale light fixtures. e. Use of pavement treatments and decorative tree wells. f. Accent planting, textured paving, and specimen trees used to establish identities at building entries. g. Traffic control and utility hardware such as backflow devices, traffic control cabinets, cable television boxes, and air vacuum and release enclosures shall be screened from view and colored to blend in with the surroundings. Such hardware should be placed outside sidewalks and away from intersections to the extent feasible.	**Consistent.** The proposed project would include landscaping trees between Cathedral Oaks Road and the project site. The proposed project includes extension of an existing Class I trail which would assist to buffer pedestrians and bicyclists from traffic. Landscaping would not result in interferences in the public right-of-way on Cathedral Oaks Road.

Policy	Project Consistency
VH 4.12: 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 stated in Section 4.1, *Aesthetics and Visual Resources*, the proposed project's exterior lighting would consist of downward directed fixtures. Proposed project lighting would be designed and shielded in accordance with City standards. Exterior lighting used at night (i.e. roadway lighting) would be dimmed after 11:00 p.m. to the maximum extent practical without compromising public safety. All exterior lighting in common areas and on individual parcels would be designed to meet the City's "dark sky" and low energy use requirements and would conform to the architectural scale of the residential neighborhood
VH 4.14: Utilities. New development projects shall be required to place new utility lines underground. Existing overhead utility lines should be placed underground when feasible. Undergrounding of utility hardware is encouraged. Any aboveground utility hardware, such as water meters, electrical transformers, or backflow devices, shall not inhibit line of sight or encroach into public walkways and, where feasible, should be screened from public view by methods including, but not limited to, appropriate paint color, landscaping, and/or walls.	**Consistent**. The proposed project would underground all utilities, and no aboveground utilities are proposed.
VH 4.15: Site-Specific Visual Assessments. The use of story poles, physical or software-based models, photo-realistic visual simulations, perspectives, photographs, or other tools shall be required, when appropriate, to evaluate the visual effects of proposed development and demonstrate visual compatibility and impacts on scenic views.	**Consistent.** Visual simulations were used in Section 4.1, *Aesthetics and Visual Resources*, to evaluate the visual effects of the proposed project.
Transportation Element (TE)	
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 a continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road, which would promote pedestrian and bicycle transportation.
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 a continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road, which would be an investment in the bikeway and system.

Policy	Project Consistency
TE 3.4 Minor Arterials. Routes designated as minor arterials are shown in Figure 7-2. The following criteria and standards apply to these streets: a. Definition/Function: Minor arterials serve as a secondary type of arterial street carrying local through traffic within communities, frequently providing access to shopping areas, employment centers, recreational areas, residential areas, and places of assembly. A minor arterial may connect different neighborhood areas within the city. b. Design Standards: The following standards shall apply: 1) A minor arterial may be a divided or an undivided multi-lane street, with or without center median. 2) The number of through-travel lanes is usually one lane in each direction, although two lanes may be provided on particular segments, when warranted by traffic volumes. 3) Lane widths and intersection geometrics shall be adequate to accommodate transit vehicles and large trucks. 4) Intersections of arterials with cross-routes are provided at grade, although partial control of access may occur at some locations. Intersection controls shall give priority to traffic flow on the minor arterial rather than the cross-route, except where the cross-route is a major arterial. 5) Minor arterials shall include facilities to accommodate pedestrians and bicycles. 6) At a minimum, minor arterials shall include curbs, gutters, and sidewalks. Minor arterials may include landscaped medians and/or landscaped strips between curb and sidewalk. 7) Parking may be required in appropriate segments on either or both sides of the street.	**Consistent.** Cathedral Oaks Road is designated as a minor arterial. The proposed project would include utility trenching within Cathedral Oaks Road and the installation of two driveways connecting Cathedral Oaks Road with the project site. Proposed driveways would have sufficient width to minimize conflicts between through-traffic and turning movements and would provide sufficient ingress/egress. The proposed utility trenching and driveways would maintain the design standards for minor arterials set forth in Policy TE 3.4
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. Table 7-3 provides descriptions of the LOS categories.	**Consistent.** As discussed in the *Phase I Traffic and VMT Assessment* (Appendix J), the proposed project would be consistent with the City's Level of Service C standard for roadways and intersections.

Policy	Project Consistency
TE 9.3: Parking in Residential Neighborhoods. Any proposed new or expanded use in residential areas shall provide adequate onsite parking to support the use. Adequate parking shall be provided to minimize the need for parking in public rights-of-way and to avoid spillover of parking onto adjacent uses and into other areas. The existing supply of on-street parking spaces shall be preserved to the maximum extent feasible. Off-street parking for proposed new single-family dwellings in all residential use categories shall be provided in enclosed garages. Driveway aprons in single-family residential neighborhoods shall have sufficient widths and depths to allow parking of two standard-sized vehicles in front of the garage.	**Consistent.** As shown on the project site plans (Appendix B), each proposed residential unit would include multi-space garage and driveway parking. Thus, the proposed project would meet the minimum parking requirements.
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 a continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road which would promote pedestrian transportation.
TE 11.1: Bikeways Plan Map. Figure 7-6 [of the Transportation Element] identifies the locations of planned Class I, II, and III dedicated bike paths and local streets that are intended to serve as bike routes. The bikeways plan is intended to establish a safe, interconnected system of bikeways that is linked to walkways and trails to meet existing and anticipated mobility needs of residents for nonmotorized transportation. The plan includes links with existing and proposed bicycle routes in adjacent jurisdictions to interconnect with the regional system of facilities.	**Consistent.** The proposed project would not interfere with the existing Class II bike lane located on Cathedral Oaks Road. During construction, a Construction Traffic Management Plan would be implemented to ensure disruptions to bicycle facilities on Cathedral Oaks Road are minimized. The extension of the existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road would not interfere with the Class II bike lane within Cathedral Oaks Road, which is separate from the Class I trail.
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.	**Consistent.** The proposed residences would include garages which offer storage for residents' bicycles. Residents would be able to shower and change within their homes. The proposed project would include a continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road which would provide a connection to the existing portion of the Class I trail. In addition, the project site is located adjacent to Cathedral Oaks Road, which contains a Class II bike lane, which is separate from the Class I trail.

Policy	Project Consistency
Public Facilities Element	
PF 3.1: Fire Protection Standards. The Santa Barbara County Fire Department employs the following three standards with respect to provision of fire protection services: a. A firefighter-to-population ratio of one firefighter on duty 24 hours a day for every 2,000 in population is considered "ideal," although a countywide ratio (including rural areas) of one firefighter per 4,000 population is the absolute minimum standard. Considering the daytime population in Goleta due to employees and customers, all fire stations within Goleta fell short of this service standard as of 2005. b. A ratio of one engine company per 16,000 population, assuming four firefighters per station, represents the maximum population that the Santa Barbara County Fire Department has determined can be adequately served by a four-person crew. Fire stations 11 and 12 (see Table 8-1) did not satisfy this standard as of 2005. Currently, all three fire engines that serve Goleta are staffed with only three-person crews. The National Fire Protection Association (NFPA) guidelines state that engine companies shall be staffed with a minimum of four on-duty personnel. c. The third fire protection standard is a 5-minute response time in urban areas. This incorporates the following NFPA response-time objectives: i. One minute (60 seconds) for turnout time. ii. Four minutes (240 seconds) or less for the arrival of the first-arriving engine company at a fire suppression incident and/or 8 minutes (480 seconds) or less for the deployment of a full first alarm assignment at a fire suppression incident. iii. Four minutes (240 seconds) or less for the arrival of a unit with first-responder or higher level capability at an emergency medical incident. iv. Eight minutes (480 seconds) or less for the arrival of an advanced life support unit at an emergency medical incident, where this service is provided by the fire department.	**Consistent.** The proposed project would result in a population increase of approximately 145 new residents. The Santa Barbara County Fire Department has approximately 214 firefighters which provides a ratio of approximately 2.77 firefighters per 2,000 persons within its service population (Santa Barbara County Fire Department 2023). The addition of 145 new residents would not substantially alter this ratio such that it falls beneath Santa Barbara County Fire Department standards. As described in Section 4.0.3.5, *Public Services*, of Chapter 4, *Environmental Impact Analysis*, the project site is proximate to existing and planned fire protection facilities, and the project would not result in substantial deficiencies to fire protection services.
PF 3.3 Impact Fees for Fire Protection Facilities/Equipment. Construction of the new Fire Station 10 shall be funded in part by revenues from an impact fee imposed on new development within the city, as well as upon development in the nearby unincorporated areas. Such fees may also be imposed for upgrades of existing fire stations and for new fire apparatus.	**Consistent.** As described in Section 4.0.3.5, *Public Services*, of Chapter 4, *Environmental Impact Analysis*, the project applicant would be required to pay developer fees to support fire protection services in Goleta.

Policy	Project Consistency
PF-3.4: Fire Safety In New Development: The following fire safety standards shall be met, where applicable, in new development within the city: a. Two routes of ingress and egress shall be required for any new development or subdivision of land requiring approval of a discretionary action. This requirement may be waived by the City when secondary access cannot be provided and maintenance of fire safety standards are ensured by other means. b. All private roads that provide access to structures served by the Santa Barbara County Fire Department shall be constructed at a minimum to the department's standards. c. All nonagricultural development in the foothills area shall include provisions for connection to the GWD or another public water purveyor. d. Emergency access shall be a consideration in the siting and design of all new development within the city.	**Consistent**. The proposed project design includes two driveways for ingress and egress. All internal roadways on the project site would be constructed in accordance with Santa Barbara County Fire Department Standards. The proposed project would be served by the Goleta Water District. As described in Section 4.11, *Transportation and Circulation*, the proposed project would not hinder emergency access.
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.** As described in Section 4.0.3.5, *Public Services*, of Chapter 4, *Environmental Impact Analysis*, the project applicant would be required to pay developer fees to support police protection services in Goleta.
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 described in Section 4.0.3.5, *Public Services*, of Chapter 4, *Environmental Impact Analysis*, the proposed project would not result in a substantial impact related to safety or demand for police services.
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.** The project applicant would be required to pay state-mandated developer fees to fund the construction of school facilities to accommodate students generated from the proposed project.
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 described in Section 4.0.3.5, *Public Services*, of Chapter 4, *Environmental Impact Analysis*, the project applicant would be required to pay development impact fees which would provide funding for fire protection, emergency services, schools, and libraries.

Policy	Project Consistency
Noise Element (NE)	
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 proposed project would temporarily increase local noise levels that may exceed Goleta's construction noise standard of 65 A-weighted decibels; however, the project applicant would implement mitigation that would ensure noise levels do not exceed 65 dBA at nearby sensitive receptors. As discussed under Impact NOI-1 in Section 4.10, *Noise*, mitigation could include a combination of temporary noise barrier installation, construction signage, and outfitting trucks with "smart alarms" that would reduce noise when operating in reverse, in addition to other measures. Construction noise control measures may be combined as necessary to demonstrate that such measures would reduce construction noise below the City's noise standard.
NE 1.2 Location of New Residential Development. Where sites, or portions of sites, designated by the land use element for residential use exceed 60 dBA CNEL, the City shall require measures to be incorporated into the design of projects that will mitigate interior noise levels and noise levels for exterior living and play areas to an acceptable level. In the event that a proposed residential or mixed-use project exceeds these standards, the project may be approved only if it would provide a substantial benefit to the City, including, but not limited to, provision of affordable residential units. Mitigation measures shall reduce interior noise levels to 45 dBA CNEL or less, while noise levels at exterior living areas and play areas should in general not exceed 60 dBA CNEL and 65 dBA CNEL, respectively.	**Consistent**. According to Figure 9-1 of the Noise Element, the project site is not located within an area exceeding 60 dBA CNEL. As described in Section 4.10, *Noise*, project operation would not include operational equipment that would exceed City noise standards and would not induce substantial vehicle travel such that traffic noise increases substantially.
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 a.m. to 5:00 p.m.

Policy	Project Consistency
NE 6.5 Other Measures to Reduce Construction Noise. The following measures shall be incorporated into grading and building plan specifications to reduce the impact of construction noise: a. All construction equipment shall have properly maintained sound-control devices, and no equipment shall have an unmuffled exhaust system. b. 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. c. To the extent practicable, adequate buffers shall be maintained between noise-generating machinery or equipment and any sensitive receivers. The buffer should ensure that noise at the receiver 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.	**Consistent.** The proposed project would incorporate the measures required by Policy NE 6.5, which are consistent with Mitigation Measure NOI-1 (refer to Section 4.10, *Noise*), including ensuring construction equipment is properly maintained, implementing additional noise measures to minimize noise generation, and buffering construction equipment from sensitive receptors.
Housing Element (HE)	
HE 2.4 Facilitate Affordable Housing Development. The City will use its regulatory, financial, and administrative resources to assist in developing affordable and special needs housing units. Specific actions to be taken include the following: a. Density Bonus. Continue to monitor changes to State law and update Title 17 of the Goleta Municipal Code as necessary to ensure conformance with Density Bonus law. b. Increase Housing Potential in New Developments. Engage with potential and new project applicants regarding housing, and in particular affordable housing, potential on their site. Information provided will include, but not be limited to, the residential density allowance for the site, incentives for housing development including density bonus allowances, potential funding sources, and affordable housing providers that may be able to collaborate on development. Engagement will occur during all public counter inquiries, formal Planner Consultations, and as advisory comments during the completeness review process. In addition, the City will contact affordable housing developers annually to identify development opportunities. c. Long-Term Affordability Covenants. The City will continue to apply resale controls and income restrictions consistent with current law to ensure that affordable housing provided through incentives or as a condition of development approval remains affordable to the income group for which it is intended.	**Consistent.** The proposed project includes the provision of affordable housing on the project site.

Policy	Project Consistency
d. Financial Equivalent Options. Consider financial-equivalent options for affordable housing and special needs housing, including land acquisition and land banking by February 2025. e. Lot Consolidation and Subdivision. The City will facilitate affordable multiple-unit housing development on small parcels by encouraging the consolidation of adjacent parcels and on large parcels by encouraging parcel subdivision. Parcel maps or lot line adjustments will be processed as part of development applications at no additional cost for developments that provide affordable dwelling units. Engagement will occur during all public counter inquiries, formal Planner Consultations, and as advisory comments during the completeness review process. f. Reduced Impact Fees. The City will consider establishing an automatic reduction or waiver of development impact fees by December 2024 for development that includes affordable dwelling units, with priority for 100% affordable and special needs housing projects not already receiving a reduction or waiver. g. Affordable Housing Design. The City will research affordable design principles, including in collaboration with other agencies and stakeholders, to determine potential viability in the City and pursue regulatory amendments, as warranted, by February 2025. h. Priority Processing. The City will prioritize procedures that speed up the processing of applications for 100% affordable housing projects with the exception of-site management and/or support units. The City shall give such projects priority in allocating work assignments, scheduling, and hearings.	
HE 4.2 Resource Conservation in Existing and New Residential Development. The City will promote the following practices in existing and new residential construction: a. Retrofitting of existing residential structures to reduce energy consumption and costs to owners and tenants is encouraged. These retrofits may include, without limitation, increased insulation, weather stripping, caulking of windows and doors, low-flow showerheads, and other similar improvements. The City will require individual residential units within multifamily housing projects to be separately metered or submetered for all utilities. b. The City will enforce the State's and City's residential energy conservation building standards through the City's plan check and building permit issuance processes. c. New residential development and additions to existing homes must be designed to provide a maximum solar orientation when appropriate and cannot adversely affect the solar access of adjacent residential structures. Use of solar water heating systems, operational skylights, passive solar heating, and waste heat recovery systems is encouraged.	**Consistent.** As described in Section 4.0.2.2, *Energy,* of Chapter 4, *Environmental Impact Analysis*, the proposed project would be consistent with California Building Code Title 24 and the City's Strategic Energy Plan. The proposed design of the residences would include solar photovoltaic systems pursuant to the requirements of California Building Code Title 24, Part 6.

Policy	Project Consistency
HE 4.3 Use of Renewable Energy Sources. For new projects, the City encourages the incorporation of renewable energy sources. The City will consider incorporating renewable energy sources that do not have adverse effects on the environment or on any adjacent residential uses. Solar access must be protected in accordance with the State of California Solar Rights Act. New development cannot impair the performance of existing solar energy systems. Compensatory or mitigation measures may be considered in instances where there is no reasonable alternative.	**Consistent.** As described in Section 4.0.2.2, *Energy,* of Chapter 4, *Environmental Impact Analysis*, the proposed design of the residences would include solar photovoltaic systems pursuant to the requirements of California Building Code Title 24, Part 6.
HE 4.4 Transit-Oriented Development. The City will encourage transit-oriented housing development to enable efficient public transit systems and alternatives to driving (walking and bicycling). In coordination with regional transportation planning activities, the City will work with developers to incorporate transit improvements, such as bus shelters and turnouts or other transit improvements, as appropriate and feasible for a project. Residential development plans will incorporate pedestrian and bicycle facilities, including, but not limited to, sidewalks, benches, bicycle racks, and bicycle storage areas, to the extent feasible. The City will consider requests to reduce required parking for transit-oriented housing developments where alternative-transportation improvements are incorporated on or adjacent to the project site through the approval of a Development Plan, Modification, or Conditional Use Permit.	**Consistent.** As described in Section 4.11, *Transportation and Circulation*, the proposed project provides two new access points on Cathedral Oaks Road; internal streets that connect to existing bicycle and pedestrian facilities. These features would allow for integration with the surrounding circulation network and encourage walking and bicycling. The proposed project also includes continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road. The Class I trail would provide an exclusive right-of-way for bicycle and pedestrian use and minimize vehicle cross flows. The proposed project would not disrupt transit facilities as temporary construction-related effects would be addressed through the City's encroachment permitting and Construction Traffic Management Plan implementation and requirements.

4.9.4 Cumulative Impacts

The geographic scope for potential cumulative impacts to land use and planning is the City of Goleta. This geographic scope is appropriate given the land use at an individual project site will affect the overall character and land use patterns within Goleta over time. Past, present, and reasonably foreseeable future projects include the projects listed in Table 3-1 in Chapter 3, *Related Projects*. Cumulative projects within the geographic scope would consist of construction of a total of 534 residential units, 440,599 square feet of industrial space, and 163,930 square feet of commercial space. Cumulative projects also include oil and gas infrastructure removal, animal shelter renovations, construction and renovation of medical facilities, parkland improvements, one synagogue, one church, hotel renovations, battery energy storage infrastructure, restoration and habitat management activities, and various roadway improvements.

Past, present, and reasonably foreseeable future projects would not physically divide an established community. Most cumulative projects would not include the construction of new linear features that could prevent mobility of a community. Cumulative projects that include new linear features, such as the planned construction of a new overcrossing over U.S. Highway 101, would improve connectivity within the city of Goleta. Conflicts regarding compatibility between past, present, and reasonably foreseeable future projects and applicable land use plans, policies, or regulations would be localized and addressed on a case-by-case basis. The City General Plan/Coastal Land Use Plan, Municipal Code, and other relevant land use or planning documents are legally binding documents guiding land use and development decisions within the city. All cumulative projects must be reviewed for consistency, and if determined to have conflicts with these plans, they would not be approved. Therefore, cumulative development would not result in a significant cumulative impact to land use and planning.

4.10 Noise

This section provides an overview of the fundamentals of noise and vibration, human sensitivity and perception of noise, the existing noise environment in the project site, provides a list of applicable regulatory requirements related to noise, and qualitatively evaluates both temporary noise impacts associated with construction activity and long-term noise impacts associated with occupancy of the proposed project.

4.10.1 Setting

4.10.1.1 Overview of Sound Measurement

Noise level (or volume) is generally 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 to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

In addition to the instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound pressure level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, Leq is summed over a one-hour period.

Generally, a doubling of sound energy is equivalent to an increase of 3 dB and a sound that is 10 dB more than the ambient sound level would result in a negligible increase (less than 0.5 dB) in total ambient sound levels. Because of the nature of the human ear, a sound must be about 10 dB greater than the reference sound to be judged as twice as loud. In general, a 3 dB change in community noise levels is noticeable, while 1-2 dB changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40 to 50 dBA, while those along arterial streets are in the 50 to 60+ dBA range. Normal conversational levels are in the 60-65 dBA range and ambient noise levels greater than that can interrupt conversations.

Noise levels typically attenuate at a rate of 6 dB per doubling of distance from point sources such as industrial machinery. Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dB per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dB per doubling of distance.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the daytime. To evaluate community noise on a 24-hour basis, the day-night average sound level was developed (Ldn). Ldn is the average of all A-weighted levels for a 24-hour period with a 10 dB upward adjustment added to those noise levels occurring between 10:00 p.m. and 7:00 a.m. to account for the general increased sensitivity of people to nighttime noise levels.

The Community Noise Equivalent Level (CNEL) is identical to the Ldn with one exception. The CNEL adds 5 dB to evening noise levels (7:00 p.m. to 10:00 p.m.). Thus, both the Ldn and CNEL noise measures represent a 24-hour average of A-weighted noise levels with Ldn providing a nighttime adjustment and CNEL providing both an evening and nighttime adjustment.

4.10.1.2 Fundamentals of Groundborne Vibration

Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured as particle velocity in inches per second and, in the United States (U.S.), is referenced as vibration decibels (VdB).

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. The general human response to different levels of groundborne vibration velocity levels is described in Table 4.10-1.

Table 4.10-1 Human Response to Different Levels of Groundborne Vibration

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.
90 VdB	Difficulty with tasks such as reading computer screens.

Source: U.S. Federal Transit Administration (FTA) 2018

4.10.1.3 Existing Noise Sources

The City of Goleta is affected by several different noise sources, including automobile and railway traffic, commercial and industrial operations, and periodic nuisances such as construction noise, loud gatherings, and other events.

The nearest land uses to the project site are the residences adjacent to Cathedral Oaks Road, located as close as 65 feet from the southern edge of the project site, and residences to the west approximately 200 feet from the project site. In addition, the Glen Annie Golf Course is within 100 feet of the project site. The primary noise sources in the area are those associated with vehicular traffic from Cathedral Oaks Road, a two- and four-lane arterial roadway that is located along the project site's southern frontage. To a lesser extent, local neighborhood roads such as Northgate Drive/Evergreen Drive and Royal Linda Drive also contribute to the existing noise environment. In addition, typical noise sources associated with residential neighborhoods (i.e. lawn mowing, dogs barking) are also part of the existing noise environment. The project site is not within the City of Goleta General Plan/Coastal Land Use Plan noise contours of the Santa Barbara Airport, Union Pacific Railroad, or U.S. 101.

The existing noise level of a typical residential development is approximately 55 dBA Leq (City of Goleta 2006). In general, noise levels caused by traffic are directly correlated with the volumes and speeds of vehicles and with increases in the number of large truck vehicles. Typical noise levels from traffic in the vicinity of the project site ranges from 50 to 60+ dBA.

4.10.1.4 Sensitive Noise Receptors

The City of Goleta General Plan/Coastal Land Use Plan Noise Element defines sensitive receivers 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. The existing residential and recreational uses in the vicinity of the project site are considered noise-sensitive receivers. The nearest sensitive receivers are the residences adjacent to Cathedral Oaks Road, located as close as 65 feet from the southern edge of the project site, and residences to the west approximately 200 feet from the project site. In addition, the Glen Annie Golf Course is within 100 feet of the project site, which is considered an open space area that qualifies as a noise sensitive use.

4.10.1.5 Groundborne Vibration

Within the City of Goleta, sources of groundborne vibration can occur from Santa Barbara Municipal Airport, Union Pacific Railroad, and U.S. 101. Noise contours are often used as a means of assessing the potential of groundborne vibration. According to the City of Goleta General Plan/Coastal Land Use Plan, the project site is located outside of the current and the anticipated 2030 60 dBA CNEL noise contour of the Santa Barbara Municipal Airport, Union Pacific Railroad, and U.S. 101, indicating that groundborne vibration in the vicinity of the project site from these sources does not occur.

4.10.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations relevant to noise that would apply to the proposed project.

b. State Regulations

California Code of Regulations has regulations for evaluating the compatibility of various land uses as a function of community noise exposure. The State of California also establishes noise limits for vehicles licensed to operate on public roads, with those limits contained in the Motor Vehicle Code. These standards are implemented through controls on vehicle manufacturers and by legal sanction of vehicle operators by state and local law enforcement officials.

c. Local Regulations

City of Goleta General Plan/Coastal Land Use Plan

The City requires that potential noise effects be evaluated in terms of either the CNEL or Ldn, and establishes maximum noise levels that are considered compatible with various land uses. The City of Goleta General Plan/Coastal Land Use Plan Noise Element has established noise standards and provides policies to ensure compatibility of land uses with noise exposure levels, and to neither introduce new development in areas with unacceptable noise levels nor allow new noise sources that would impact existing development. Table 4.10-2 shows the noise and land use compatibility criteria in the City's Noise Element.

Table 4.10-2 City of Goleta General Plan/Coastal Land Use Plan Community Noise Exposure

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 – multiple family	50-60	60-65	65-75	75-85+
Schools, libraries, churches, hospitals, and nursing homes	50-60	60-65	65-80	80-85+
Playgrounds and neighborhood parks	50-70	n/a	70-75	75-85+
Golf courses, riding stables, water recreation, and cemeteries	50-70	n/a	70-80	80-85+
Office buildings, business commercial, and professional	50-67.5	67.5-75	75-85+	n/a
Industrial, manufacturing, utilities, and agriculture	50-70	70-75	75-85+	n/a

Source: City of Goleta 2006

Policies in the City of Goleta General Plan/Coastal Land Use Plan Noise Element that would apply to the proposed project include those related to land use compatibility, and location of new residential development.

The criteria in Table 4.10-2 establishes that 60 dBA is the maximum exterior CNEL (or Ldn) that is normally compatible with residential development. This limit may be extended up to 65 dBA if noise reduction features are included within project design. With respect to interior noise levels in residences, the 45 dBA threshold is set forth in Policy NE 1.2.

The exterior and interior noise standards are consistent with one another since normal wood frame residential construction usually provides from 12 to 18 dBA of reduction from exterior to interior areas, and well over 20 dBA is commonly achieved in modern structures that meet current energy conservation requirements. It can be reasonably predicted that an exterior Ldn of 65 dBA will be reduced to an interior Ldn of 45 dBA using basic construction techniques and materials.

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

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

Goleta Municipal Code

The City's Municipal Code Chapter 9.09 regulates noise in the City. The purpose of the chapter is to preserve public peace and comfort of citizens of Goleta from unwarranted noise and disturbances. The Municipal Code prohibits loud and unreasonable noise between the hours of 10:00 p.m. and 7:00 a.m. seven days per week. 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 sound is broadcast. The City does not have any code requirements related to noise from construction activities but the Municipal Code noise regulations would apply to construction noise.

4.10.3 Impact Analysis

4.10.3.1 Methodology and Significance Thresholds

Methodology

Construction Noise

Due to the complex nature of construction activity and the fact that equipment continuously moves around a project site over the course of a workday, FTA's *Transit Noise and Vibration Impact Assessment Manual* recommends evaluating construction noise impacts from the center of the construction site, stating that the distance variable in its recommended construction noise calculation "assumes that all equipment operates at the center of the project" (FTA 2018). Therefore, it is industry-standard practice to analyze average construction noise from the center of a site, and the proposed project's construction equipment noise is measured in accordance with this FTA recommendation; this would result in an average distance of 100 feet to the residences to the south, 200 feet to the golf course, and 300 feet to the residences to the west.

Construction Vibration

Groundborne vibration levels associated with construction activities were estimated based on the estimates in FTA's *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018). Potential vibration levels were identified for locations that are sensitive to vibration, including nearby residences.

Stationary Noise

The primary stationary noise source associated with operation of the proposed project would be mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units). Based on the site plan, HVAC units could be located approximately 100 feet from the residences to the south of the proposed residential development on the project site. This analysis assumes the use of a typical HVAC system for a residential development, such as a 2.5-ton Carrier 24ABA4030 air conditioner with Puron refrigerant. Manufacturer's specifications indicate this unit has a sound power level of 76 dBA, which results in a sound pressure level of approximately 68 dBA at one meter (3.28 feet) from the unit (Carrier 2007).

Traffic Noise

The project's operational vehicle trips would primarily generate additional vehicular noise on nearby roadways such as Cathedral Oaks Road. The project's increase in trip generation on this roadway was considered against existing vehicle trips obtained from the *Phase I Traffic and VMT Assessment* prepared for the proposed project (Appendix J) to determine the relative increase in noise levels.

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on noise. Would the project:

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, expose 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 receivers to the hours of 8:00 a.m. to 5:00 p.m., Monday through Friday, residential areas which this site is located in. According to the County's 2024 *Environmental Thresholds and Guidelines Manual,* impacts would be significant if construction noise exceeds 65 dBA at nearby sensitive receivers.

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 receivers is below 65 dBA CNEL, and if the proposed project would generate noise that would cause the existing noise levels experienced by the sensitive receivers to exceed 65 dBA 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 receivers exceeds 65 dBA CNEL, and if the proposed project would generate noise that would cause the existing noise levels experienced by the sensitive receivers to increase by 3 dBA 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 receivers to an unacceptable increase in noise levels. For the purpose 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 4.10-2 or by 5 dBA or more if the locations are not subject to noise levels in excess of the aforementioned standards.

Groundborne Vibration Impacts

The City does not have thresholds for vibration impacts. This analysis uses the FTA vibration impact thresholds to determine whether groundborne vibration would be "excessive." A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Consequently, the FTA recommends an 80 VdB threshold for infrequent events at residences and buildings where people normally sleep (e.g., the future on-site residences and the residences 500 feet southwest of and across the street from the project site). In terms of groundborne vibration impacts on structures, the FTA states that groundborne vibration levels in excess of 100 VdB would damage fragile buildings and levels in excess of 95 VdB would damage extremely fragile historic buildings.

4.10.3.2 Project Impacts and Mitigation Measures

Threshold 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?

Impact N-1 **SHORT-TERM CONSTRUCTION OF THE PROPOSED PROJECT WOULD TEMPORARILY INCREASE LOCAL NOISE LEVELS THAT MAY EXCEED GOLETA'S CONSTRUCTION NOISE STANDARD OF 65 DBA. THROUGH IMPLEMENTATION OF MITIGATION MEASURE NOI-1, IMPACTS WOULD BE CLASS II, LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED. PROJECT OPERATION WOULD INCLUDE MECHANICAL EQUIPMENT THAT WOULD INCREASE NOISE LEVELS. HOWEVER, NOISE LEVELS GENERATED DURING PROJECT OPERATION WOULD NOT EXCEED THE CITY'S NOISE THRESHOLDS AT THE NEAREST PROPERTIES. IN ADDITION, THE PROJECT'S CONTRIBUTION TO TRAFFIC NOISE WOULD NOT EXCEED THRESHOLDS. IMPACTS WOULD BE CLASS III, LESS THAN SIGNIFICANT.**

Construction

Residential construction projects produce readily apparent noise. The sensitivity to noise from such construction is increased when it occurs in or near residential areas or other sensitive receivers. The nearest sensitive receivers are the residences adjacent to Cathedral Oaks Road, located as close as 65 feet from the southern edge of the project site, and residences to the west approximately 200 feet from the project site. In addition, the Glen Annie Golf Course is within 100 feet of the project site.

The proposed project would be constructed in approximately 18 months. The grading/excavation phase of project construction tends to create the highest construction noise levels because of the operation of heavy equipment, although only a limited amount of equipment can operate near a given location at a particular time. For general construction activities, predicted average-daily construction noise levels were calculated assuming three louder pieces of equipment operating simultaneously.[1] Default equipment assumptions from CalEEMod were included in the air quality analysis (see Appendix C); from this list, a grader, scraper, and dozer were used as the three louder pieces of equipment for the analysis.

Table 4.10-3 shows typical noise levels associated with this construction equipment at distances of 100, 200, and 300 feet from the noise source.

[1] On most typical construction sites, up to three pieces of heavy-duty equipment would be operating in a work area simultaneously.

Table 4.10-3 Typical Noise Levels at Construction Sites

Equipment	dBA		
	Residences to South[1] (100 Feet)	Golf Course[1] (200 Feet)	Residence to West[1] (300 Feet)
Grader, Scraper, and Dozer	78	72	68
Threshold	65	65	65
Exceed Threshold?	**Yes**	**Yes**	**Yes**

[1] Distance from sensitive receptors to construction measured from the center of the project site, consistent with guidance within FTA's *Transit Noise and Vibration Impact Assessment Manual*.

Noise levels assume a noise attenuation rate of 6 dBA per doubling of distance.

Source: FTA 2018

The closest residences to the south could experience construction noise levels of 78 dBA from the source. Residences to the west and golfers at the Glen Annie Golf Course would experience noise levels ranging from 68 and 72 dBA, respectively. Overall, construction noise within 450 feet of sensitive receptors would exceed Goleta's 65 dBA standard.

As a Condition of Approval, standard measures from the City of Goleta General Plan/Coastal Land Use Plan Noise Element would be implemented to address short-term construction noise. These include complying with Policy NE 6.4 which restricts construction activities near or adjacent to residential buildings and other sensitive receptors to the hours of 8:00 a.m. to 5:00 p.m. and using properly maintained equipment with a muffled exhaust system, shutting off idling equipment, and maintaining adequate buffers between construction activities and sensitive receptors.

However, with implementation of standard measures that are required by regulations, construction noise levels may still exceed Goleta's 65 dBA construction noise standard at nearby noise-sensitive receivers. Therefore, construction noise impacts would be potentially significant.

Operation

Stationary Noise

Stationary noise refers to noise that remains relatively constant over time. The primary stationary noise source associated with operation of the proposed project would be HVAC units at the proposed residences. As stated under *Methodology*, a typical HVAC unit generates a noise level of 68 dBA at 3.28 feet (Carrier 2007). This noise level would attenuate to 38 dBA at a distance of 100 feet, which is the distance to the nearest residences, with no obstructions or barriers to the noise. The noise levels would be well below the City's 65 dBA CNEL standard, and would be reduced further with the proposed perimeter walls. Therefore, operational noise impacts from the proposed project's stationary noise sources would be less than significant.

Traffic Noise

As described in the *Phase I Traffic and VMT Assessment* prepared for the proposed project (Appendix J), the proposed project would generate a total of 477 average daily vehicle trips (ADT) that would be added to the existing traffic volumes on the local roadway system. At each turning opportunity, the proposed project contribution to the total traffic volume would be progressively diluted, along with the potential to contribute to noise levels. Future ADT along Cathedral Oaks Road in the vicinity of the proposed project would be 8,900 ADT (Appendix J).

Quiet suburban areas typically have noise levels in the range of 40 to 50 dBA, while those along arterial streets are in the 50 to 60+ dBA range. Near the project site, both noise sources are present due to the residential nature of the area and Cathedral Oaks Road operating as a two-lane arterial.

In general, a 3 dB change in community noise levels is noticeable, while 1-2 dB changes generally are not perceived. The proposed project would increase traffic noise levels by 0.2 dBA CNEL, well below a 3 dB increase in noise levels. As such, project-related traffic noise impacts on adjacent sensitive receivers are not expected to be detectable. Therefore, this impact would be less than significant.

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 that uses heavy-duty equipment within 450 feet of residences and the golf course (measured from the center of the site) to ensure noise levels do not exceed 65 dBA at nearby sensitive receivers. 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. The Construction Noise Control Plan may include, but would not be limited to, the following to reduce construction noise below the City's 65 dBA construction noise standard. Construction noise control measures may be combined as necessary to demonstrate that such measures would reduce construction noise below the City's noise standard. The construction contractor shall provide proof in the Construction Noise Control Plan that the chosen measures would reduce construction noise below the City's 65 dBA construction noise standard:

- Prior to use of any construction equipment, the contractor shall fit all equipment with properly operating mufflers, air intake silencers, and engine shrouds no less effective than as originally equipped by the manufacturer.
- Installation of temporary sound barriers/blankets to break the line of sight between construction equipment and sensitive receivers within 450 feet of the project site. The barriers shall 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.
- Staging and delivery areas shall be located as far as feasible from existing residences and the golf course. 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, either City code enforcement or a contractor-retained and Goleta-approved noise consultant shall conduct noise measurements at the properties that registered the complaint. The noise measurements shall be conducted for a minimum of one hour to determine if noise levels are compliant with City's 65

dBA standard. The consultant shall prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.

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.

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 ensure that construction noise levels do not exceed the City's 65 dBA construction noise standard. Measures may include a temporary noise barrier to break the line of sight between construction equipment and residences within 450 feet of heavy-duty equipment operation. 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 temporary noise barrier which would block the line-of-sight between the equipment exhaust stacks and nearest receivers would be 15 dBA. With this reduction, noise levels at the closest residences 100 feet south (identified in Table 4.10-3) would be 63 dBA or lower. In lieu of barriers, measures listed in Mitigation Measure NOI-1 may also be combined if it can be demonstrated that such measures would reduce construction noise below the City's 65 dBA construction noise standard. Therefore, with implementation of a Construction Noise Control Plan, construction noise levels would not exceed Goleta's 65 dBA construction noise standard, and impacts would be less than significant with mitigation.

Threshold 2:	Generation of excessive groundborne vibration or groundborne noise levels?

Impact N-2 PROJECT CONSTRUCTION WOULD NOT RESULT IN VIBRATION THAT EXCEEDS FEDERAL TRANSIT ADMINISTRATION THRESHOLDS. PROJECT OPERATION WOULD NOT INVOLVE SUBSTANTIAL VIBRATION SOURCES ASSOCIATED WITH OPERATION. CONSTRUCTION AND OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT.*

Construction

Construction activities that would occur at the project site have the potential to generate low levels of groundborne vibration. Table 4.10-4 identifies various vibration velocity levels for the types of construction equipment that could operate at the construction sites.

Table 4.10-4 Vibration Levels for Construction Equipment

Equipment	Approximate VdB		
	25 feet	50 feet	100 feet
Hoe Ram	87	78	69
Large Bulldozer	87	78	69
Drilling	87	78	69
Loaded Trucks	86	77	68
Jackhammer	79	70	61
Small Bulldozer	58	48	39

Source: FTA 2018

Based on the information in Table 4.10-4, vibration levels could reach approximately78 VdB at 50 feet. This would not exceed the FTA's threshold of 83 VdB for buildings with primarily daytime uses. The nearest residence is located approximately 65 feet away; therefore, vibration levels at the nearest residence would not exceed the FTA's threshold. In addition, it is anticipated that construction of the proposed project would not involve the use of ramming or drilling equipment, which tend to result in higher vibration levels. As construction progresses north into the project site, potential vibration affecting adjacent residences would be further reduced. Therefore, vibration levels as a result of construction would be below the level needed to perceive vibration for most people. The potential vibration impacts as a result of construction would be less than significant.

Operation

Operational activities known to generate excessive groundborne vibration include projects involving railroads and subways. The proposed project would not involve substantial vibration sources associated with operation such as this because operation of residences does not include these uses. Therefore, the proposed project's operational groundborne vibration and noise impacts would be less than significant.

Mitigation Measures

No mitigation is 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, expose people residing or working in the project area to excessive noise levels?

Impact N-3 THE PROJECT SITE IS LOCATED OUTSIDE OF THE NOISE CONTOURS FOR THE SANTA BARBARA AIRPORT. THE PROPOSED PROJECT WOULD NOT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS. NO IMPACT WOULD OCCUR.

The airport nearest to the project site, the Santa Barbara Airport, is located approximately 1.8 miles southeast of the project site. As described in Section 4.10.1.3, the project site is located outside of noise contours for the Santa Barbara Airport. The project site is also not located within the vicinity of a private airstrip. Therefore, the project would not expose people residing or working in the project area to excessive noise levels. No impact would occur.

Mitigation Measures

No mitigation is required.

4.10.4 Cumulative Impacts

Construction noise is localized and rapidly attenuates within an urban environment. A cumulative impact analysis for noise typically considers impacts that would occur from the construction and operation of cumulative projects within 0.1-mile from the project site; as identified in Table 3-1 of Chapter 3, *Related Projects*, the only projects within this distance are the Annual Pavement Rehabilitation Project and Pavement Management Program and the Glen Annie Golf Course Residential Development. Therefore, cumulative impacts are analyzed against these projects. The general approach to cumulative impact analysis used in this EIR is discussed in Section 3, *Related Projects*.

Some construction activities from the Annual Pavement Rehabilitation Project and Pavement Management Program and Glen Annie Golf Course Residential Development may occur within several hundred feet of the nearest sensitive receivers and therefore may expose these receivers to construction noise simultaneously with construction noise generated by the proposed project, which could result in increased noise exposure to the sensitive receivers from combined noise levels. Although real world conditions would likely minimize the cumulative effect via noise direction, angles, attenuation, and dispersion, cumulative construction noise impacts could still occur and this impact would be potentially significant. As described in Impact N-1, the proposed project would include implementation of Mitigation Measure NOI-1 to reduce project construction noise levels to comply with Goleta's construction noise thresholds. As project construction would not generate a substantial increase in ambient noise levels with mitigation, the proposed project's contribution to cumulative construction noise impacts would not be considerable.

Similar to construction noise, construction vibration is localized and rapidly attenuates within a developed area. Potential vibration from the Annual Pavement Rehabilitation Project and Pavement Management Program and Glen Annie Golf Course Residential Development would occur from a different direction from the nearest sensitive receiver than the proposed project and thus approach different angles of the nearest vibration sensitive receivers, ensuring the vibration travels further distances before it could theoretically combine with the proposed project's vibration. As the Annual Pavement Rehabilitation Project and Pavement Management Program and Glen Annie Golf Course Residential Development would be constructed at a similar or further distance from the nearest sensitive receiver, associated 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 anticipated for the Annual Pavement Rehabilitation Project and Pavement Management Program or Glen Annie Golf Course Residential Development. Therefore, the combined vibration level from cumulative projects would still be well below vibration limits, and no cumulative construction vibration impact would occur.

The Annual Pavement Rehabilitation Project and Pavement Management Program would not have an operational component. The Glen Annie Golf Course Residential Development would have an operational component which would include similar residential operations as the proposed project. Operational noise would be localized and rapidly attenuate due to the effects of distance, intervening structures, and topography that block the line of sight. Therefore, the ability of on-site project noise to combine with noise from off-site sources to create a substantial increase in noise levels would not

occur. However, cumulative projects could create a cumulative increase in off-site traffic noise if the cumulative increase in vehicle trips resulting from cumulative development would result in a 3 dBA or greater increase in traffic noise on Cathedral Oaks Road. As such, cumulative operational traffic noise impacts would be potentially significant. As discussed in Impact N-2, the proposed project's addition to traffic would not result in a noticeable off-site traffic noise increase; thus, the proposed project's traffic noise increase would not result in considerable contribution to significant cumulative traffic noise impacts.

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4.11 Transportation and Circulation

This transportation and circulation section is based on Associated Transportation Engineers' (ATE) *Phase I Traffic and VMT Assessment*, dated July 30, 2025, provided in Appendix J of this document.

4.11.1 Setting

The existing transportation system that provides access to and within the City of Goleta is comprised of highways, arterial roadways, collector streets, and associated bicycle and pedestrian facilities. Roadway descriptions and the existing transportation system that provide access to the project site are discussed in greater detail below.

Regional Access

Regional access to the project site is provided by United States Route 101 (U.S. 101). U.S. 101 is located approximately 0.6 mile south of the project site. U.S. 101 is a multi-lane interstate freeway serving the Pacific Coast, and is the primary route between Goleta 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 Cathedral Oaks Road/U.S. 101 or Storke Road-Glenn Annie Road/U.S. 101 interchanges, approximately 1.2 miles southwest and 0.9 mile southeast of the project site, respectively.

Local Access

Classifications

The City utilizes the roadway categories recognized by regional, state, and federal transportation agencies. There are four categories in the roadway hierarchy ranging from freeways, with the highest capacity, to two-lane undivided roadways, with the lowest capacity. The roadway categories are summarized as follows:

Freeways are limited-access and high-speed travelways included in the state and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of 1 mile or greater. No local access is provided to adjacent land uses.

Arterial roadways are major streets that primarily serve through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and their major intersections are signalized. This roadway type is divided into two categories: principal and minor arterials. Principal arterials are typically four-or-more-lane roadways and serve both local and regional through-traffic. Minor arterials are typically two-to-four-lane streets that service local and commuter traffic.

Collector roadways are streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. Collector roadways connect local streets to arterials and are typically designed with two through-travel lanes (i.e., one through-travel lane in each direction) that may accommodate on-street parking. They may also provide access to abutting properties.

Local roadways distribute traffic within a neighborhood, or similar adjacent neighborhoods, and are not intended for use as through-streets or as links between higher-capacity facilities such as collector or arterial roadways. Local streets are fronted by residential uses and do not typically serve commercial uses.

Roadways in the Project Vicinity

Local access to the project site is provided by arterial, collector, and local roadways. Descriptions of streets providing local access to the project site are provided below.

Cathedral Oaks Road is a two- and four-lane minor arterial roadway located along the project site's southern frontage. This east/west-oriented roadway extends from Goleta to Santa Barbara, providing an alternative travel route to U.S. 101 and Hollister Avenue through Goleta.

Glen Annie Road/Storke Road is a two- and four-lane principal arterial roadway east of the project site and is referred to as Glen Annie Road north of U.S. 101 and referred to as Storke Road south of the freeway. It extends between Cathedral Oaks Road on the north and El Colegio Road on the south. This roadway provides freeway access to the western portion of the Goleta Valley area via an interchange with U.S. 101. North of the freeway, Glen Annie Road is two lanes; south of the freeway, Storke Road is four lanes, except near its southern terminus, where it narrows to two lanes.

Hollister Avenue is south of U.S. 101 and is an east/west-oriented principal arterial ranging from two to four lanes. This roadway begins as the continuation of State Street in Santa Barbara to the east and extends through the City of Goleta past the U.S. 101 interchange at Hollister Road/Winchester Canyon Road to the entrance of the Ritz-Carlton Bacara Resort. Hollister Avenue serves as the major alternative east-west travel route to U.S. 101 in the Goleta Valley area.

Calle Real is a minor arterial roadway south of the project site and functions as a discontinuous frontage road on the north side of U.S. 101 from West Pueblo Street in the city of Santa Barbara to west of Eagle Canyon Road in Santa Barbara County located west of Goleta. Near the project site, it is an east/west-oriented arterial with two travel lanes between Glen Annie Road and Cathedral Oaks Road. Calle Real provides the northbound connections to U.S. 101 at the Glen Annie Road/Storke Road and Winchester Canyon Road/Hollister Avenue interchanges.

Other major collector streets and local roads in the project vicinity include: Winchester Canyon Road; Northgate Drive/Evergreen Drive; Brandon Drive; Placer Drive; Royal Linda Drive/King Daniel Lane; Alameda Avenue; and Del Norte Drive.

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 2025).

- **Class I** on the north side of Cathedral Oaks Road between the eastern property line of the project parcel and Glen Annie Road
- **Class II** on the east side of Placer Drive
- **Class II** along both sides of Cathedral Oaks Road
- **Class III** on the east side of Evergreen Drive

Pedestrian facilities include sidewalks, crosswalks, multi-use paths, and pedestrian signals at signalized intersections. In the immediate vicinity of the project site, sidewalks are present along the southern frontage of Cathedral Oaks Road, and along Northgate Drive/Evergreen Drive, Brandon Drive, Placer Drive, Royal Linda Drive/King Daniel Lane.

Transit Facilities

The Santa Barbara Metropolitan Transit District (MTD) provides local bus service for the region. The nearest existing bus stop to the project site is located at Brandon Drive and Evergreen Drive, southwest of the project frontage, which is served by MTD Line 23 (MTD 2025). Data published on the MTD website indicate that from July 2024 to September 2024, Line 23 carried approximately 11 passengers per operating hour. During the same period, Line 23 experienced one "at capacity" load and one "too full to board" load (MTD 2024).

4.11.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations applicable to this transportation and circulation impact analysis.

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 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 Land Use and Climate Innovation (LCI; formerly the Governor's Office of Planning and Research) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (LCI 2018). 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; it is 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 LCI to develop revisions to the CEQA Guidelines 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 changed 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, Section 21099, subd. [b][2]).

On January 20, 2016, LCI released the Revis*ed 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 (LCI 2018).

c. Local Regulations

Santa Barbara County Association of Governments Connected 2050 Regional Transportation Plan and Sustainable Communities Strategy

The Santa Barbara County Association of Governments (SBCAG) is a regional planning agency comprised of Santa Barbara County and all eight incorporated cities within the County. The 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 would 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 2025). SBCAG adopted its 2050 RTP-SCS (titled Connected 2050) in August 2021 and updated the plan in August 2025 (SBCAG 2025).

Santa Barbara County Fire Department Development Standards

The Santa Barbara County Fire Department (SBCFD) provides fire protection and emergency services to unincorporated Santa Barbara County, Buellton, Solvang, and Goleta. SBCFD establishes development standards that projects in the jurisdiction of SBCFD must implement for approval, including standards that set forth specifications related to roadway widths, driveway widths, and turnout sizes.

City of Goleta VMT Guidelines

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). The resolution outlines screening criteria under which certain projects may be presumed to have a less than significant VMT impact, including:

- Projects generating fewer than 110 daily trips,
- Projects located in low-VMT areas,

- Projects near high-frequency transit stops,
- Projects with at least 20 percent low or very low-income affordable housing, and
- Locally serving retail projects under 10,000 square feet.

The proposed project includes construction of 56 single-family units, including 11 deed-restricted affordable units. However, only five units meet the "low" or "extremely low" income criteria, which is not sufficient to qualify for the affordable housing screening exemption under Resolution No. 20-44. As a result, a full VMT analysis is required for the proposed project.

City of Goleta General Plan/Coastal Land Use Plan

The City of Goleta General Plan/Coastal Land Use 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. Policies applicable to the proposed project include the following (City of Goleta 2006):

- **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.
- **TE 2: Transportation Demand Management**

  Objective: To attempt to influence individual travel behavior, particularly by workers at larger scale employers, to lower future increases in peak-hour commute trips and other trips by persons in single-occupant vehicles
- **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 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 10: Pedestrian Circulation**

  Objective: To encourage increased walking for recreational and other purposes by developing an interconnected, safe, convenient, and visually attractive pedestrian circulation system.
- **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: Bikeways Plan**

  Objective: To encourage increased bicycle use for commuting and recreational purposes by developing an interconnected circulation system for bicycles that is safe, convenient, and within a visually attractive environment.
- **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.
- **TE 12:** Transportation Systems Management

  Objective: To establish operational controls that will manage the street network in a manner that will efficiently and safely utilize the existing limited capacity consistent with protection of the surrounding neighborhood.

City of Goleta Municipal Code

Chapter 12.02, Article I, of the City's Municipal Code requires an applicant to obtain a permit for excavating within a road right-of-way or installing, maintaining, cutting into, repairing or removing any sidewalks, curbs, gutters or road surfacing; or installing, repairing or removing any facilities or substructures in, on, over, or under any road right-of-way. As a condition of this permit, the project applicant must keep two lanes open for vehicle traffic at road intersections whenever possible. Pedestrian crossings must be provided at least every 300 feet. If excavations occur within the roadway, at least one safe crossing for vehicles and pedestrians must be maintained when possible. In addition, Section 12.02.320 requires the use of barriers and warning devices necessary for safety and Section 12.02.330 requires that traffic flow is maintained as practicable throughout excavation. Section 12.02.060 permits the City to require that permit application include additional plans for City review.

Section 17.24.210 of the City's Municipal Code sets forth regulations for vision clearance at driveways and prohibits obstructions exceeding three feet in height from being placed adjacent to driveways.

4.11.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

This project-specific analysis is based, in part, on the *Phase I Traffic and VMT Assessment for the Shelby Residential Development* prepared by ATE in July 2025 (Appendix J). The methodology in 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. To implement SB 743, both the City of Goleta and County of Santa Barbara have developed project-level VMT calculators to evaluate VMT generated by land use projects in the area. Both calculators derive VMT information from data in the SBCAG regional VMT model. Given that vehicle miles are distributed regionally and based on the project site's proximity to unincorporated Santa Barbara County, both the City and County VMT calculators were used to analyze the project.

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on traffic 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 Chapter 4, *Environmental Impact Analysis*, the following thresholds are based on the County's 2024 *Environmental Thresholds and Guidelines Manual* and Appendix G of the *CEQA Guidelines*. For the analysis of VMT impacts, the City threshold is 16.79 VMT per resident and the County threshold is 14.9 VMT per resident.

b. Project Impacts and Mitigation Measures

Threshold 1:	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE CITY TRANSPORTATION AND CIRCULATION POLICIES AND WOULD INCLUDE INFRASTRUCTURE TO PROMOTE BICYCLE AND PEDESTRIAN CIRCULATION IN THE PROJECT VICINITY. IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT.*

The City of Goleta's Transportation Element promotes a safe, efficient, and multimodal transportation system (City of Goleta 2006). Consistent with Policy TE 1.1 proposed project provides two new access points on Cathedral Oaks Road; internal streets that connect to existing bicycle and pedestrian facilities; and internal sidewalks and pedestrian connections to the Class I multi-use path for bicycle and pedestrian use. These features would allow for integration with the surrounding circulation network and encourage walking and bicycling. The project would also advance Policy TE 2 by incorporating active transportation reduction strategies such as affordable housing integration and incorporation of bicycle facilities and pedestrian improvements. The proposed project also supports Policy TE 10 and Policy TE 11 by providing pedestrian linkages and maintaining connectivity to the City's planned bikeway system (City of Goleta 2006). This would be achieved with the project by the inclusion of frontage improvements along Cathedral Oaks Road between Northgate Drive to the west and the Glenn Annie Golf Course property to the east. These frontage improvements include two driveway entrances to the site, curb and gutter installation, and continuation of an existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road. The Class I trail would provide an exclusive right-of-way for bicycle and pedestrian use and minimize vehicle cross flows (i.e., the locations which a vehicle can cross the pathway).

Construction activities may require temporary lane closures within the public right-of-way (e.g., along Cathedral Oaks Road) to complete frontage improvements and utility work, resulting in temporary disruptions to vehicular and multi-modal circulation in the area. In accordance with Chapter 12.02 of the City's Municipal Code, the project applicant would be required to maintain at least one safe crossing for vehicles and must implement measures to minimize disruption to existing traffic

conditions. To ensure compliance with the City's Municipal Code, as a Condition of Approval, the project applicant's construction contractor would be required to prepare and implement a Construction Traffic Management Plan, which must specify transportation measures to be implemented during construction on Cathedral Oaks Road to ensure disruptions to transit, roadway, bicycle, and pedestrian facilities are minimized. These measures include the use of traffic control measures for traffic safety; coordination with SBCFD and MTD; and coordination with concurrent construction projects within 0.25-mile of planned improvements on Cathedral Oaks Road to ensure temporary lane and/or roadway closures on Hollister Avenue are coordinated to limit overlap. These requirements would be imposed as conditions of approval to minimize disruption and ensure safety during construction, consistent with Policy TE 12 (City of Goleta 2006).

The proposed project would be consistent with the City's General Plan/Coastal Land Use Plan Transportation Element multimodal and performance policies and would not introduce conflicts with transit, roadway, bicycle, or pedestrian facilities. Temporary construction-related effects would be addressed through the City's encroachment permitting and Construction Traffic Management Plan implementation and requirements. Therefore, the proposed project would not include elements or features that would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. This impact would be less than significant.

Mitigation Measure

No mitigation is required.

Threshold 2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact TRA-2 THE PROPOSED PROJECT WOULD GENERATE VEHICLE MILES TRAVELED EXCEEDING THE CITY AND COUNTY THRESHOLDS. MITIGATION MEASURE TRA-1 WOULD REDUCE VEHICLE MILES TRAVELED TO THE EXTENT POSSIBLE. HOWEVER, THE PROJECT WOULD STILL EXCEED THE CITY'S VEHICLE MILES TRAVELED THRESHOLD AND THIS IMPACT WOULD BE CLASS I, *SIGNIFICANT AND UNAVOIDABLE*.

Construction

Construction of the project would result in short-term, temporary vehicle trips to and from the project site during the construction phase. According to *CEQA Guidelines* Section 15064.3(b), the significance of transportation impacts is primarily determined by the amount and distance of vehicle travel attributable to a project. Project construction-related vehicle trips would be temporary and limited to the duration of construction activities. As a result, temporary construction-related VMT would not have a lasting effect on the overall transportation network or traffic patterns in the area. Therefore, VMT for project construction would not conflict with or be inconsistent with *CEQA Guidelines* Section 15064.3(b).

Operation

As described in Chapter 2, *Project Description*, the proposed project would develop 56 single-family residential units (45 market-rate and 11 deed-restricted affordable units) on a vacant site along Cathedral Oaks Road. Based on the ATE *Phase I Traffic and VMT Assessment* and City of Goleta VMT analysis tool, the project is estimated to generate 21.24 VMT per resident, which exceeds the City's threshold of 16.79 VMT per resident. Given that vehicle miles are distributed regionally and based on the project site's proximity to unincorporated Santa Barbara County, the County of Santa Barbara

VMT tool was also used to estimate project VMT in relation to County thresholds. Using the County's VMT calculator, the project is estimated to generate 15.9 VMT per resident, which exceeds the County threshold of 14.9 VMT per resident. Therefore, the proposed project would potentially be inconsistent with *CEQA Guidelines* Section 15064.3(b). This impact would be potentially significant.

Mitigation Measures

TRA-1 Vehicle Miles Traveled Reduction Plan

The applicant shall prepare and submit a Vehicle Miles Traveled (VMT) Reduction 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 VMT Reduction Plan shall specify the VMT reduction measures to be implemented during project design and development. The measures specified in the VMT Reduction Plan shall be included in development plans and implemented during project development. The VMT Reduction Plan may include, but would not be limited to, the following:

- Integrate Affordable and Below Market Rate Housing: Provide 9 percent low-income units (five units), 5 percent moderate-income units, and 5 percent above-moderate (workforce) units for a total of 20 percent income-restricted units.
- Provide Pedestrian Network Improvements: Provide a safe path from the project to transit stop, connect pedestrian walkways to existing pedestrian facilities along Glenn Annie Road and Cathedral Oaks Road.
- Improve Design of Development: Implement or provide funding for improvements to corridors and crossings for bike networks identified within a 0.5-mile buffer of the project boundary, particularly along Cathedral Oaks Road.
- Extend Transit Network Coverage or Hours: Provide a bus stop adjacent to the project site on Cathedral Oaks Road.
- Implement School Pool Program: Work with school district(s) to create ridesharing program for school children.

Plan Requirements and Timing: The Planning and Environmental Review Director or designee shall approve the VMT Reduction Plan demonstrating incorporation of all feasible VMT reduction strategies/measures into project design prior to issuance of the zoning clearance for the grading permit/demolition permit. The measures specified in the VMT Reduction Plan shall be included in the building and grading plans.

Monitoring: The City shall monitor compliance with the requirements of the VMT Reduction Plan periodically during construction and following project occupancy and shall promptly investigate and respond to any non-compliance issues.

Significance After Mitigation

Based on the assumed VMT reductions in the ATE *Phase I Traffic and VMT Assessment* for the potential reduction measures included in Mitigation Measure TRA-1, VMT could potentially be reduced to 12.75 VMT per resident, which would be below the County's threshold of 14.9 VMT per resident. With Mitigation Measure TRA-1, VMT could potentially be reduced to 17.03 VMT per resident for the City of Goleta. As such, the project would still exceed the City VMT threshold of 16.79 VMT per resident. Furthermore, the implementation of some VMT reduction programs (i.e., improve design of development, extend transit network coverage or hours) could result in additional ground-

disturbing activities which would result in additional environmental impacts associated with increased ground disturbance. Despite implementation of all feasible mitigation for VMT reduction, the project would still conflict with *CEQA Guidelines* Section 15064.3(b), and the impact would remain significant and unavoidable.

Threshold 3:	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 IN ACCORDANCE WITH LOCAL REGULATIONS AND WITH REVIEW BY THE SANTA BARBARA COUNTY FIRE DEPARTMENT, THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY INCREASE TRANSPORTATION OR CIRCULATION HAZARDS. CONSTRUCTION AND OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

The proposed project would not substantially increase hazards due to a geometric design feature or incompatible use. The project includes two new access points on Cathedral Oaks Road that are aligned with Royal Linda Drive and King Daniel Lane across Cathedral Oaks Road. These intersections would be controlled by two-way stop signs for the new roadways. The geometry of these intersections would provide clear visibility and minimize potential offset intersection conflicts and ensuring compliance with City design standards for safe access and circulation (City of Goleta 2006).

The internal circulation system consists of a looped roadway with one cul-de-sac, which is typical for residential subdivisions and does not introduce sharp curves or unusual alignments. Surrounding uses include residential neighborhoods, a golf course, and schools. The proposed residential development of the site would not present new conflicts with farm equipment or other incompatible uses. Furthermore, the proposed project would incorporate sidewalks and frontage improvements, including the continuation of an existing Class I multi-use trail along Cathedral Oaks Road, which would enhance pedestrian and bicycle safety in accordance with the City's Transportation Element goals for multimodal connectivity. Based on these considerations, the proposed project would not create or exacerbate hazards related to roadway geometry or incompatible uses, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 4:	Result in inadequate emergency access?

Impact TRA-4 IN ACCORDANCE WITH LOCAL REGULATIONS AND WITH REVIEW BY THE SANTA BARBARA COUNTY FIRE DEPARTMENT, THE PROPOSED PROJECT WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS. CONSTRUCTION AND OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

During construction, equipment staging and worker parking would occur entirely on-site, which would minimize the potential for construction-related vehicles to block travel lanes or impede emergency access in the immediate area. The proposed frontage improvements along Cathedral Oaks Road, including curb, gutter, and Class I trail continuation, may require temporary encroachment into the public right-of-way and lane closures. These temporary lane closures could result in short-term disruptions to traffic flow on Cathedral Oaks Road, which serves as a primary access route for the project site and surrounding neighborhoods. In accordance with Chapter 12.02 of the City's Municipal Code, the project applicant would be required to maintain at least one safe crossing for vehicles and must implement measures to minimize disruption to existing traffic conditions. As previously

discussed, the project would require implementation of a Construction Traffic Management Plan. This plan would provide for traffic control measures and minimization of disruptions to critical access points for emergency service vehicles during construction and would be reviewed and approved by SBCFD. Accordingly, construction would not result in inadequate emergency access and impacts would be less than significant.

Project operations would not result in inadequate emergency access. The proposed project includes two new access points on Cathedral Oaks Road, which are aligned with existing local roads and designed to meet City of Goleta standards for safe ingress and egress (City of Goleta 2006). The internal circulation system would also provide multiple routes for emergency vehicles to access all lots. The proposed project would comply with SBCFD requirements for roadway width, turning radii, and fire apparatus access. Additionally, the project frontage improvements along Cathedral Oaks Road would maintain unobstructed travel lanes and do not include any features that would impede emergency response. No gated entries or other barriers that could restrict emergency access are proposed. Based on these design features and compliance with applicable fire and transportation standards, the proposed project would provide adequate emergency access, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.11.4 Cumulative Impacts

Regional cumulative impacts consider City-wide effects that would occur from reasonably anticipated projects identified in Table 3-1 of Chapter 3, *Related Projects*. The general approach to cumulative impact analysis used in this EIR is discussed in Chapter 3, *Related Projects*. Cumulative development in Goleta would be subject to the same transportation-related programs, plans, ordinances, and policies as the proposed project. Specifically, 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 shown in Table 3-1 of Chapter 3, *Related Projects*, the Annual Pavement Rehabilitation Project and Pavement Management Program is currently under construction and may require closure of Cathedral Oaks Road and other roads near the project site. Road closures for this project in combination with changes to transportation and circulation as a result of other future development projects in the vicinity that may require road closures, new design features, or rerouting of traffic could result in a potentially significant cumulative impact related to existing roadway, pedestrian, bicycle, or transit facilities. The proposed project would require temporary lane closures along Cathedral Oaks Road during frontage improvements. These closures could result in short-term disruptions of multi-modal transportation on Cathedral Oaks Road. As a Condition of Approval, the project applicant's construction contractor would be required to implement a Construction Traffic Management Plan. This plan would include coordination with the City and emergency service providers to avoid overlapping closures, which would minimize the potential for the proposed project to contribute to cumulative roadway, bicycle, pedestrian, or transit route closures or detours. The proposed project would include features such as the extension of the Class I multi-use path on Cathedral Oaks Road and incorporation of bicycle and pedestrian facilities on-site that would provide increased opportunities for multi-modal transportation. Accordingly, the proposed project's contribution to cumulative impacts on roadway, bicycle, and pedestrian facilities would not be considerable.

Significant cumulative VMT impacts could occur if cumulative development increases VMT in the City beyond established thresholds. Cumulative projects include 470 residential units, 379,568 square feet of industrial space, and 203,113 square feet of commercial space, each of which could induce additional vehicle travel above City-established thresholds. Accordingly, cumulative impacts would be potentially significant. The proposed project would generate 21.24 VMT per resident, which exceeds the City's threshold of 16.79 VMT per resident. Although the proposed project includes design features and Mitigation Measure TRA-1 that would reduce VMT, cumulative VMT impacts would remain significant and unavoidable because the reduction would not reduce VTM below the City's threshold. Therefore, the proposed project's contribution to cumulative VMT impacts would be considerable.

As shown in Table 3-1 of Chapter 3, *Related Projects*, the Annual Pavement Rehabilitation Project and Pavement Management Program is currently under construction and may require closure of Cathedral Oaks Road and other roads near the project site. Road closures for this project in combination with changes to transportation and circulation as a result of other future development projects in the vicinity that may require road closures, new design features, or rerouting of traffic could result in the creation of transportation hazards or substantial delays in emergency access. Therefore, cumulative impacts related to transportation hazards and emergency access would be potentially significant. The proposed project would require temporary lane closures along Cathedral Oaks Road during frontage improvements. These closures could result in short-term disruptions to traffic flow and emergency access in the immediate area. As a Condition of Approval, the project applicant's construction contractor would be required to implement a Construction Traffic Management Plan. This plan would include coordination with the City and emergency service providers to avoid overlapping closures and maintain emergency access. In addition, this plan would minimize potential transportation hazards on Cathedral Oaks Road. With implementation of this plan, the proposed project's contribution to cumulative impacts related to transportation hazards and emergency access would not be considerable.

4.12 Tribal Cultural Resources

This section of the EIR analyzes the proposed project's potential impacts related to tribal cultural resources. The background information and analysis in this section is partially based on the Phase 1 Cultural Resources Investigation (Rasmussen 1999), the Extended Phase 1 Archaeological Investigation Shelby Residential Project (Dudek 2011), and the 2025 Cultural Resources Inventory Memorandum (Langan 2025). The above mentioned reports contain confidential information exempt from disclosure under the California Public Records Act, and are available to qualified professionals upon request.

4.12.1 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). 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.

b. Native American Consultation

As detailed further in Section 4.12.2, *Regulatory Setting*, Assembly Bill 52 (AB 52), which went into effect on July 1, 2015, establishes a formal consultation process with California Native American tribes that must be completed before a CEQA document can be certified. However, AB 52 applies to projects for which a Notice of Preparation was released on or after July 1, 2015. Because the Notice of Preparation for the proposed project was issued in August 2012, prior to the effective date of AB 52, the formal tribal consultation process outlined in AB 52 is not required for the proposed project, and the summary of consultation efforts below does not qualify as formal AB 52 consultation.

The mapped site location was tested with three shovel probes in 2011. The Chumash Native American community, represented by Gilbert Unzueta, Barbareño Chumash elder, monitored this excavation. No prehistoric cultural materials were recovered. A survey of the mapped site location and vicinity was conducted on June 19, 2013. No prehistoric cultural materials were observed.

In a letter dated August 9, 2013, separate from the original Senate Bill 18[1] consultation for the project in 2011, a request for a Sacred Lands File search and a Native American Contact list was submitted to the Native American Heritage Commission (NAHC). On August 29, 2013, the list of Native American groups and individuals provided by the NAHC were contacted by mail and asked if they had any cultural information about the project site or concerns about the proposed project. Comments were requested by September 30, 2013; no responses were received.

In a letter dated July 25, 2014, the City invited the local Native American community to a general meeting on August 12, 2014 to discuss the proposed project. No one from the tribes attended the meeting. Kathleen Pappo of the Barbareño/Ventureño Band of Mission Indians provided a letter in response to the request on August 6, 2014 (Pappo 2014), noting that she would like to see some of the land that was formerly occupied by the Chumash Native Americans to remain undeveloped.

Although not required pursuant to AB 52, the City is engaging in informal consultation with tribes listed in the NAHC Native American Contact list to provide these tribes with updates to the proposed project.

4.12.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations applicable to the proposed project.

b. State Regulations

Assembly Bill 52

AB 52, which went into effect on July 1, 2015, requires lead agencies to evaluate a project's impact on tribal cultural resources. AB 52 establishes, "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code [PRC] Section 21084.2). It further states the CEQA lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

[1] Past tribal consultation pursuant to Senate Bill 18 was conducted for the proposed project in October 2011. Senate Bill 18 consultation occurs when a project includes a proposed amendment of adoption of a General Plan or Specific Plan, or the designation of open space. As described in Section 2.1, *Introduction*, of Chapter 2, *Project Description*, the proposed project no longer requires a General Plan Amendment. Therefore, information related to prior Senate Bill 18 consultation is not included herein.

PRC Section 21074(a)(1)(A) and (B) define tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and that meets at least one of the following criteria, as summarized in Appendix G of the *CEQA Guidelines*:

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

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

Although AB 52 is a current requirement under CEQA for evaluating impacts to tribal cultural resources, it is not applicable to the proposed project. AB 52 applies to projects for which a Notice of Preparation was released on or after July 1, 2015. Because the Notice of Preparation for the proposed project was issued in August 2012, prior to the effective date of AB 52, the formal tribal consultation process outlined in AB 52 is not required for the proposed project.

Although not required pursuant to AB 52, the City is engaging in informal consultation with tribes listed in the NAHC Native American Contact list to provide these tribes with updates to the proposed project.

c. Local Regulations

City of Goleta's General Plan/Coastal Land Use Plan

The City of Goleta General Plan/Coastal Land Use Plan Open Space Element (2006) outlines several goals and policies related to the preservation of cultural resources, including tribal cultural resources:

- **OS 8.1: Definition.** Cultural resources include Native American archaeological sites and areas of the natural landscape that have traditional cultural significance. Archaeological sites include prehistoric sites that represent the material remains of Native American societies and their activities and ethnohistoric sites that are Native American settlements occupied after the arrival of European settlers in California. Such archaeological sites may include villages, seasonal campsites, burial sites, stone tool quarry sites, hunting sites, traditional trails, and sites with rock carvings or paintings. Areas of traditional cultural significance include Native American sacred areas where religious ceremonies are practiced or which are central to their origins as a people, as well as areas traditionally used to gather plants for food, medicinal, or economic purposes.
- **OS 8.3: Preservation.** The City shall protect and preserve cultural resources from destruction. The preferred method for preserving a recorded archeological site shall be by preservation in place to maintain the relationship between the artifacts and the archaeological context. Preservation in place may be accomplished by deed restriction as a permanent conservation easement, avoidance through site planning and design, or incorporation of sites into other open spaces to prevent any future development or use that might otherwise adversely impact these resources.

- **OS 8.4: Evaluation of Significance.** For any development proposal identified as being located in an area of archaeological sensitivity, a Phase I cultural resources inventory shall be conducted by a professional archaeologist or other qualified expert. All sites determined through a Phase 1 investigation to potentially include cultural resources must undergo subsurface investigation to determine the extent, integrity, and significance of the site. Where Native American artifacts have been found or where oral traditions indicate the site was used by Native Americans in the past, research shall be conducted to determine the extent of the archaeological significance of the site.
- **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.
- **OS 8.6: Monitoring and Discovery.** On-site monitoring by a qualified archaeologist and appropriate Native American observer shall be required for all grading, excavation, and site preparation that involves earth moving operations on sites identified as archaeologically sensitive. If cultural resources of potential importance are uncovered during construction, the following shall occur:
  - The grading or excavation shall cease and the City shall be notified.
  - A qualified archeologist shall prepare a report assessing the significance of the find and provide recommendations regarding appropriate disposition.
  - Disposition will be determined by the City in conjunction with the affected Native American nation.

Goleta Historic Preservation and Archaeological and Tribal Cultural Ordinance (Ordinance No. 22-05)

The Goleta Historic Preservation and Archaeological and Tribal Cultural Ordinance, passed in April 2022, establishes regulations and processes associated with archaeological resources and tribal cultural resources. This includes Chapter 17.43 (Archaeological and Tribal Cultural Resources) of the City's Municipal Code, applicable provisions of which 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.

4.12.3 Impact Analysis

4.12.3.1 Methodology and Significance Thresholds

Methodology

As described in Section 4.12.2 above, the City of Goleta initiated outreach to the local Native American community regarding the proposed project under Senate Bill 18 as the initial project involved a General Plan Amendment which has been determined no longer necessary as well as independent outreach separate from the Senate Bill 18 process requirements. Initial notification letters were sent in October 2011 to tribes identified as having traditional lands in the project area. No responses were received.

In August 2013, a Sacred Lands File search and a Native American contact list were requested from the NAHC. Letters were mailed to the identified contacts later that month, requesting input on cultural resources or concerns related to the proposed project. No responses were received by the requested deadline.

Additional outreach occurred in July 2014, when the City invited tribal representatives to a meeting to discuss the proposed project. Although no tribal representatives attended, a written response was received from Kathleen Pappo of the Barbareño/Ventureño Band of Mission Indians, expressing interest in preserving portions of land historically occupied by Chumash peoples. These consultation efforts informed the tribal cultural resources analysis below.

The results of the records searches previously conducted in 2011 and 2013 and updated in 2025, and the project site survey in 1999 and testing conducted in 2011 also inform the tribal cultural resources analysis below.

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines*. *CEQA Guidelines* Appendix G provides the following significance thresholds to determine if a project would have a potentially significant impact on tribal cultural resources. Would the project:

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 2024 *Environmental Thresholds and Guidelines* Manual (refer to Chapter 4, *Environmental Impact Analysis*), a project "that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."

4.12.3.2 Project Impacts and Mitigation Measures

Threshold 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?

Impact TCR-1 TRIBAL CULTURAL RESOURCES MAY BE ENCOUNTERED DURING GROUND DISTURBANCE ASSOCIATED WITH PROJECT CONSTRUCTION. FOLLOWING IMPLEMENTATION OF MITIGATION MEASURES CUL-1 THROUGH CUL-3, IMPACTS WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

Although the project is not required to comply with the tribal consultation requirements of AB 52, the City of Goleta conducted outreach to the local Native American community in 2013 and 2014. The only response received was a written response Barbareño/Ventureño Band of Mission Indians expressing general interest in preserving land historically occupied by Chumash peoples. No project- or site-specific comments, concerns or requests were received from the local tribes. Additionally, on September 23, 2025, the City held a consultation with Amanda Dobrov from Santa Ynez Band of Chumash Indians. Ms. Dobrov was provided all background documentation and would decide if she wanted to provide comments or not. To date, no comments have been received. Additionally, the City notified Eleanor Fishburn from Barbareno Band of Chumash Indians and the Cultural Resource Committee from the Barbareno/Ventureno Band of Mission Indians regarding consultations and comments but no comments have been submitted as of date.

Based on previous project site testing, there is a high degree of confidence in the absence of tribal cultural resources on the project site (Dudek 2011). No tribal cultural resources were identified during consultation with the local tribes, and no additional tribal concerns were raised. Therefore, based on the absence of identified tribal cultural resources and the results of prior field investigations, the

proposed project would not result in a substantial adverse change to any known tribal cultural resources.

Although impacts to known tribal resources would not occur, there is a potential for unknown tribal resources not identified during project site testing to be encountered during ground disturbing activities. Moreover, ground disturbance during proposed project construction could inadvertently encounter and consequently damage or destroy unanticipated tribal cultural resources. Such impacts to tribal cultural resources would be potentially significant.

Mitigation Measures

Implementation of Mitigation Measures CUL-1 through CUL-3, listed in Section 4.4, *Cultural Resources*, would be required.

Significance After Mitigation

Mitigation Measures CUL-1 through CUL-3 would minimize potential impacts to tribal cultural resources of Native American origin by requiring construction monitoring and procedures and final disposition of any unanticipated discoveries of such resources. Therefore, with implementation of these measures, impacts to tribal cultural resources would be reduced to less than significant.

4.12.4 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 tribal cultural resources from the landscape. However, compliance with existing regulations protecting tribal cultural resources, including 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.

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4.13 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. The project's potential impacts related to water quality and groundwater are discussed in Section 4.8, *Hydrology and Water Quality*. The project's potential impacts related to energy usage are discussed subsection 4.0.3.2, *Energy*, in Chapter 4, *Environmental Impact Analysis*.

4.13.1 Setting

a. Water Supply

Goleta Water District Overview

The proposed project would be served by the Goleta Water District (GWD), which is the water purveyor for the City of Goleta. The GWD service area is the southern portion of Santa Barbara County. Its western border is adjacent to El Capitan State Park and its northern border runs along the foothills of the Santa Ynez Mountains and Los Padres National Forest. Its eastern boundary is the City of Santa Barbara and its southern boundary is the Pacific Ocean. The service area encompasses approximately 29,000 acres and includes the City of Goleta, University of California, and Santa Barbara Airport (City of Santa Barbara property); the remainder of the service area is located in the unincorporated County of Santa Barbara. According to the GWD's 2020 Urban Water Management Plan (UWMP), GWD provides water service to approximately 84,500 residents (GWD 2021). A City's water main is located underneath Cathedral Oaks Road.

Table 4.13-1 shows the 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 2021). In addition, in April 2024, GWD prepared an update to its Water Supply Management Plan (WSMP). The modeling prepared to inform the WSMP is based on an 82-year simulation period (GWD 2024a). As discussed in the WSMP, GWD's water supply portfolio is sufficient to supply all but 2 out of the 82-year simulation period modeled for the WSMP; however, demand could be met in these years with implementation of water conservation measures (GWD 2024a).

Table 4.13-1 GWD Water Use during WY 2012-2013 and Current Year

	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 2014, in response to extreme drought conditions throughout California, the GWD Board of Directors declared a water shortage emergency, stopped issuing new water allocations to new customers without existing water credits or historic entitlements, and imposed 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 2019). GWD stopped water rationing practices in 2024 due to an increased water supply as a result of record rainfall across California. Based on current water supply metrics, the GWD Board of Directors has permitted GWD to service up to 154.7 acre-feet of water supply allocation to new or additional development in 2025 (GWD 2024b).

Groundwater is extracted from the Goleta Groundwater Basin, the North-Central portion of which is an adjudicated basin pursuant to the *Wright v. Goleta Water District* Judgment (November 17, 1989, SBSC Case No. SM57969) (the "Wright Judgment"). Based on the Wright Judgment, GWD is allowed 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, identified as Exchange Service and Augmented Service. Based on GWD's reported rights to additional water supplies covered by the Exchange and Augmented Services Agreement, GWD has reported a groundwater entitlement of 2,357 AFY. In 1998, the Court found that the Goleta Groundwater Basin achieved hydrologic balance, meaning that recharge exceeds extractions (GWD 2023). The groundwater basin is not classified as critically overdrafted (DWR 2025).

The Wright Judgment also gives GWD the right to inject excess surface water supplies into the Basin (from Cachuma Project "spill" during high rainfall years) to recharge the Basin and replenish groundwater supplies. 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, during drought conditions. Unexercised groundwater rights at the end of a year revert to a stored water right in the Basin (GWD 2023). As of 2021, GWD reported the storage in the Basin was approximately 46,014 acre-feet (GWD 2023).

b. Wastewater

The proposed project would be served by the Goleta West Sanitary District (GWSD), which is the wastewater treatment provider for western Goleta Valley and Isla Vista. GWSD has installed approximately 6,100 connections in its service area, providing service to approximately 35,000 people (GWSD 2025). GWSD's sewer system consists of approximately 63 miles of sewer lines and 2 pump stations (GWSD 2025). GWSD also provides wastewater treatment for residents and businesses in the Western Goleta Valley and Isla Vista (GWSD 2025). A GWSD sewer main is located underneath Cathedral Oaks Road.

Wastewater generated in GWSD's service area is pumped through GWSD's sewer system to a wastewater treatment plant (WWTP) owned by Goleta Sanitary Water Resource Recovery District (GSD). GWSD, University of California Santa Barbara, City of Santa Barbara, and County of Santa Barbara each contract with GSD to utilize the WWTP, and each of these agencies are allotted a specific amount of capacity rights to the WWTP. GWSD is allotted 40.78 percent of the available capacity of the WWTP, which equates to 3.11 million gallons per day (MGD) of the WWTP's permitted capacity of 7.64 MGD (GWSD 2025). Currently, the WWTP treats approximately 5.01 MGD, of which approximately 2.18 MGD is generated by GWSD customers (McCarthy 2025).

c. Stormwater

Under existing conditions, the project site primarily slopes north to south, with moderate sloping on the western end of the project site toward El Encanto Creek. The project site is primarily drained by surface flow for eventual discharge to the Devereaux Slough and Pacific Ocean. The eastern half of the project site drains south towards Cathedral Oaks Road and the western half of the project site drains southwest toward El Encanto Creek. Additional detail regarding project site stormwater is provided in Section 4.8, *Hydrology and Water Quality*.

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] 2025a). The Tajiguas Landfill has a maximum permitted throughput of 1,285 tons per day and a remaining capacity of 7,345,787 cubic yards. The Tajiguas Landfill currently has a cease operation date of 2038 (CalRecycle 2025b). The nearest landfill to the project site that accepts contaminated soil is the Kettleman Hills Facility landfill in Kettleman City in Kern County. The Kettleman Hills Facility landfill has a maximum permitted throughput of 9,000 cubic yards per day and a remaining capacity of 15,600,000 cubic yards (CalRecycle 2025c).

The City participates in recycling programs aimed at achieving a 65 percent diversion rate of solid waste, consistent with state regulatory requirements. Based on Fiscal Year 2022-2023 Annual Report for Solid Waste Management Services, the current diversion rate for Santa Barbara County, including Goleta, is 69 percent (County of Santa Barbara 2023).

e. Electric Power, Natural Gas, and Telecommunications Facilities

There are no existing electric power, natural gas, or telecommunications lines on the project site; however, these utility lines are present beneath Cathedral Oaks Road adjacent to the project site. The project site is within the service areas of the Southern California Edison Company (SCE) and Central Coast Community Energy which provide electric power services. The proposed project would be all-electric and would not utilize natural gas infrastructure. Telecommunications services in Goleta are provided by a variety of companies such as Verizon and AT&T.

4.13.2 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 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 and the nine Regional Water Quality Control Boards.

Safe Drinking Water Act

The Safe Drinking Water Act regulates public water systems that supply drinking water (42 USC Section 300(f) et seq.; 40 Code of Federal Regulations Section 141 et seq.). The principal objective of the Safe Drinking Water Act is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the Safe Drinking Water Act 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 Code of Federal Regulations Section 144); and
- Regulate distribution systems.

b. State Regulations

California Safe Drinking Water Act

The California Safe Drinking Water Act (Health and Safety Code Section 116270 et seq.; 22 California Code of Regulations Section 64400 et seq.) regulates drinking water more rigorously than the Federal law. Like the federal Safe Drinking Water Act, California requires that primary and secondary maximum contaminant levels be established for pollutants in drinking water; however, some California MCLs are more protective of health. The Act also requires the State Water Resources Control Board to issue domestic water supply permits to public water systems.

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 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, Title 24, Part 6

California Code of Regulations 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 September 2024, CEC adopted the 2025 updates to the Building Energy Efficiency Standards, expanding requirements for heat pumps and electric-ready buildings. The 2025 Building Energy Efficiency Standards focus on key areas including installation of efficient heat pump technologies, replacing end-of-life rooftop heating, ventilation, and air-conditioning units with high efficiency systems, establishing electric-ready requirements for commercial kitchens and multifamily developments, updating solar and storage standards, and strengthening ventilation standards. The 2025 Building Energy Efficiency Standards will take effect January 1, 2026.

California Green Building Standards Code Title 24, Part 11

The California Green Building Standards Code, commonly referred to as "CALGreen," 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 Title 21 Part 11 Section 4.408.1 also requires recycling of a minimum of 65 percent of nonhazardous construction and demolition waste.

In September 2024, the CEC adopted 2025 CALGreen updates, will take effect January 1, 2026. The 2025 CALGreen updates includes voluntary energy efficiency requirements for newly constructed buildings and additions and/or alterations to existing buildings.

Assembly Bill 341

The purpose of Assembly Bill 341 is to reduce greenhouse gas 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, Assembly Bill 341 set a statewide goal for 75 percent disposal reduction by the year 2020.

Assembly Bill 939

Assembly Bill 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. This 50 percent requirement also includes construction waste. Assembly Bill 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

Senate Bill 1016 requires that the 50 percent solid waste diversion requirement established by Assembly Bill 939 be expressed in pounds per person per day. Senate Bill 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.

California Water Code – Water Wheeling

Under California's water wheeling statutes (California Water Code Section 1810), water conveyance facilities with unused, available capacity must wheel water to other local agencies and third parties provided certain conditions are met. This law provides that, subject to certain limitations,

> *[N]either the state, nor any regional or local public agency, may deny a bona fide transferor of water the use of a water conveyance facility which has unused capacity, for the period of time for which that capacity is available, if fair compensation is paid for that use.*

The right to wheel water is subject to these conditions (California Water Code 1810[a]-[d]):

(a) Any person or public agency that has a long-term water service contract with or the right to receive water from the owner of the conveyance facility shall have the right to use any unused capacity prior to any bona fide transferor.

(b) The commingling of transferred water does not result in a diminution of the beneficial uses or quality of the water in the facility, except that the transferor may, at the transferor's own expense, provide for treatment to prevent the diminution, and the transferred water is of substantially the same quality as the water in the facility.

(c) Any person or public agency that has a water service contract with or the right to receive water from the owner of the conveyance facility who has an emergency need may utilize the unused capacity that was made available pursuant to this section for the duration of the emergency.

(d) This use of a water conveyance facility is to be made without injuring any legal user of water and without unreasonably affecting fish, wildlife, or other instream beneficial uses and without unreasonably affecting the overall economy or the environment of the county from which the water is being transferred.

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, 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 Water Supply Management Plan

The GWD WSMP formulates a water supply strategy for GWD by prioritizing the use of GWD's various sources of supply, evaluating the reliability of GWD's water supplies, as well as evaluating scenarios for current and future demand. The most recent iteration of the WSMP, the 2024 WSMP, evaluates future water demand and supply to 2040, consistent with the UWMP.

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:

- GWD is receiving 100 percent of its deliveries normally allowed from the Cachuma Project.
- GWD has met legal obligations in the Wright Judgment.
- There is no water rationing.
- 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 has reaffirmed these conditions for 2025 and is permitted to allocate up to 154.7 acre-feet of water supply allocation to new or additional development in 2025.

GWD is required to reevaluate its supplies annually to determine if it can continue to issue new water allocations (GWD 2024b). 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 a 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 that 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 2025a).

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 to the City's Director of Public Works, or designee, 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.

Chapter 8.10, Article IV requires applicants to deconstruct facilities planned for demolition and make materials generated available for salvage. In addition, applicants must keep records of tonnage of recycled material that is generated during demolition and construction activities, respectively. The Director of Public Works, or designee, monitors projects to determine the percentage of waste salvaged and recycled or reused and requires the applicant to separate project waste on-site to the maximum extent feasible. In addition, Chapter 8.10, Article IV requires the applicant to submit documentation to the Director of Public Works or designee, 30 days following the completion of demolition and again 30 days following the completion of construction, which proves the applicant is in full compliance with the requirements of Chapter 8.10, Article IV. Documentation required consist of a final completed Waste Management Plan showing actual waste tonnage data, supported by original or certified photocopies of receipts and weight tickets on other records of measurement from recycling companies, deconstruction contractors, and/or landfill and disposal companies. Receipts and weight tickets are used to verify whether waste generated from the project has been or are to be recycled, reused, salvaged or disposed.

4.13.3 Impact Analysis

4.13.3.1 Methodology and Significance Thresholds

Methodology

Water Demand

Anticipated water demand for the proposed project is estimated based on the County's 2024 *Environmental Thresholds and Guidelines Manual* water demand rate of 0.27 AFY for a single family residence in Goleta Valley with a 7,000 square foot minimum lot size.

Wastewater Generation

The proposed project's anticipated wastewater generation is calculated consistent with the wastewater generation factor of 220 gallons per day per residential unit used in the City of Goleta General Plan/Coastal Land Use Plan Final EIR (City of Goleta 2006). The proposed project's wastewater generation rate is calculated based on the combined square footage of the residences.

Solid Waste Generation

Solid waste generated from demolition and construction is estimated based on a generation factor of 100 pounds per square foot for demolition and 4.38 pounds per square foot for construction, respectively. The 100 pounds per square foot metric for demolition is based on the demolition rate within the 2024 *Environmental Thresholds and Guidelines Manual*. The 4.38 pounds per square foot metric for construction is based on USEPA's Characterization of Building-Related Construction and Demolition Debris in the United States (USEPA 1998). The generation of solid waste from operation of project components is calculated based on a waste generation factor of 0.95 tons per year per residence multiplied by the average number of people per unit, as stated within the County's 2024 *Environmental Thresholds and Guidelines Manual*.

Significance Thresholds

The following thresholds are based on Appendix G of the *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 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;
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 2024 *Environmental Thresholds and Guidelines Manual* provides project-specific and cumulative thresholds for solid waste generation from discretionary development. Pursuant to the County's guidelines, any construction, demolition, or remodeling of a commercial, industrial, or residential development that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact. In addition, operation of 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 County's 2024 *Environmental Thresholds and Guidelines Manual*, 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.

4.13.3.2 Project Impacts and Mitigation Measures

Threshold 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?

Impact USS-1 THE PROPOSED PROJECT WOULD NOT REQUIRE OR NECESSITATE THE CONSTRUCTION OF ADDITIONAL WATER, WASTEWATER TREATMENT, STORMWATER DRAINAGE, ELECTRIC POWER, OR TELECOMMUNICATIONS FACILITIES BEYOND THOSE EVALUATED THROUGHOUT THIS ENVIRONMENTAL IMPACT REPORT. CONSTRUCTION AND OPERATIONAL IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Water

The proposed project includes a system of underground water lines beneath internal roadways, connecting residences to the City's water main at Cathedral Oaks Road and Royal Linda Drive, and at Cathedral Oaks Road and King Daniel Lane. The environmental impacts of these water infrastructure improvements are evaluated throughout this EIR. As discussed under Impact USS-2, the proposed project would not generate substantial water demand nor necessitate new or expanded water facilities to meet anticipated project demand. Therefore, the proposed project would not require new or expanded water facilities, beyond the improvements evaluated throughout this EIR, the construction of which could cause significant environmental effects. This impact would be less than significant.

Wastewater

The proposed project includes a system of underground sewer lines beneath internal roadways connecting residences to the City's sewer main underneath Cathedral Oaks Road adjacent to Royal Linda Drive and underneath King Daniel Lane adjacent to Cathedral Oaks Road. As discussed under Impact USS-3, the GWSD WWTP has sufficient available capacity to treat the anticipated project-generated wastewater. In addition, GWSD has indicated it has the capability to provide wastewater treatment services for the proposed project (Appendix K). 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 wastewater infrastructure improvements evaluated throughout this EIR, the construction of which could cause significant environmental effects. Therefore, this impact would be less than significant.

Stormwater

Impacts regarding stormwater drainage are discussed in detail in Section 4.8, *Hydrology and Water Quality*. The proposed project would include a detention basin located in the western portion of the project site and an underground detention system located at the southern portion of the project site. The proposed detention basin and underground detention system have been sized to ensure the post-project peak runoff outflows would be maintained the same as the pre-project peak runoff outflows for a 100-year flood event, and that outflows from this infrastructure would not exceed the existing capacities of El Encanto Creek or the storm drains on Cathedral Oaks Road (Appendix H). Because the proposed stormwater drainage facilities would allow for stormwater filtration and would adequately capture stormwater runoff, 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 underground connections for cable television and electricity at the intersection of the proposed project's driveways and Cathedral Oaks Road. The proposed project would be all-electric and would not utilize natural gas infrastructure. The environmental impacts of these utility connections are evaluated throughout this EIR. As described in Chapter 4, *Environmental Impact Analysis*, SCE and 3CE would have sufficient electricity supplies for the proposed project and the proposed project would not place a substantial demand on electricity due to wasteful energy consumption such that new or expanded off-site electrical 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 is required.

Threshold 2:	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact USS-2 THE PROPOSED PROJECT WOULD GENERATE A WATER DEMAND OF APPROXIMATELY 15.1 ACRE-FEET PER YEAR. THIS WATER DEMAND WOULD BE WITHIN GOLETA WATER DISTRICT SAFE WATER SUPPLY ALLOCATIONS, AND 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.*

As described in Section 4.13.3.1, *Methodology and Significance Thresholds*, water demand of the proposed project is estimated using the County's 2024 *Environmental Thresholds and Guidelines Manual* water demand rate of 0.27 AFY per single family residence. Accordingly, the proposed project would result in an annual water demand of approximately 15.1 AFY.[1] This demand represents approximately 10 percent of GWD's SAFE Water Supply allocation of 154.7 acre-feet. GWD's projected water surplus in a normal year 2040 is 4,507 acre-feet. In a single dry-year scenario, GWD's projected water surplus in 2040 is 2,909 acre-feet. The proposed project's water demand represents approximately 0.3 percent of the anticipated 2040 surplus. 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 0.5 percent and 0.6 percent of GWD's dry year one and dry year two surpluses, respectively.

GWD's UWMP identifies that, during years three through five of a drought, water supply and demand would be balanced with the implementation of water conservation measures. The GWD UWMP estimates a population of 34,300 for Goleta by 2040 (GWD 2021). As described in Section 4.0.3.4, *Population and Housing,* of Chapter 4, *Environmental Impact Analysis*, the current population of Goleta is approximately 32,747 people. The proposed project would result in an estimated population increase of 145 people, bringing the total population of Goleta to approximately 32,892 residents. This amount is within the population projections of GWD's UWMP. In addition, GWD accounts for

[1] 56 residences * 0.27 AFY per residence = 15.1 AFY

projected growth in the water projections in their UWMP. The 2025 UWMP is currently being developed and would account for project growth in the City of Goleta, including projected growth from the proposed project.

Pursuant to the Goleta Water District Code, new projects can only secure new water entitlement after final project approval by the applicable land use agency (in this case, the City of Goleta). Project applicants are required to obtain a Can and Will Serve letter from GWD, which specifies the water allocation to be provided to the proposed project. GWD will not issue a Can and Will Serve letter if sufficient water supplies are not available for a project. A preliminary Can and Will Serve letter would be issued prior to issuance of final building permits, and the final Can and Will Serve letter would be issued after the final building permit is issued by the City of Goleta. Under the SAFE Water Supplies Ordinance, GWD is authorized to issue one percent of its total available water supply for new water connections each year that sufficient water is available as determined by the conditions discussed in Subsection 4.13.2.c, *Goleta Water District SAFE Water Supplies Ordinance,* being met. As described above, the proposed project demand would be less than one percent of GWD's total available water supplies. However, water allocations are made on a first-come, first-served basis to projects that have received approval from the applicable land use agency (GWD 2025b). If sufficient water allocations are not available at the time an application for a water supply allocation for the proposed project is submitted to GWD, the applicant may purchase water allocations from another GWD customer. This purchase would not result in the construction of any new water infrastructure or increases in water demand beyond the demands of the proposed project; rather, this purchase is a paper transfer of one customer's allowed water credit to the project applicant for use at the project site. Alternatively, GWD could purchase additional supplies via water wheeling from another water agency or third party with excess supplies for sale, for example Montecito Water District, Slippery Rock Ranch, or Seawell LLC. Water wheeling would involve the transfer of water supplies from another water agency or third party provided that existing water infrastructure is in place for the water supply transfer and environmental clearance has been previously completed for use of the water supply.

When required by the GWD Board of Directors or District General Manager, the project applicant would be required to adhere to the water shortage restrictions during stages of drought, as set forth in Goleta Water District Code Chapter 6.21. Water shortage restrictions include prohibitions on manually irrigating landscaping with a hose not equipped with a shutoff nozzle, washing buildings or impervious areas such as driveways and walkways, and use of outdoor water features. Restrictions are also imposed to prohibit hours for landscape watering. As detailed above, GWD will review the proposed project and issue a Can and Will Serve letter, stating that GWD has sufficient water available to support the proposed project. In addition, because the proposed project's water demand is adequately captured within GWD's UWMP growth projections, 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 is required.

Threshold 3:	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 USS-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, IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Residents would generate wastewater that would flow into GWSD's conveyance system and be treated at the WWTP. Currently, the wastewater inflow to the WWTP is 5.01 MGD, leaving approximately 2.63 MGD of capacity available. GWSD is entitled to receive approximately 0.93 MGD more wastewater flows than what GWSD customers currently produce (McCarthy 2025). The proposed project's anticipated wastewater generation is calculated consistent with the wastewater generation factor of 220 gallons per day per residential unit used in the City of Goleta General Plan/Coastal Land Use Plan Final EIR (City of Goleta 2006). Accordingly, the proposed project is anticipated to result in approximately 12,320 gallons of wastewater per day, or 0.01 MGD. A 0.01 MGD increase in wastewater flows represents approximately one percent of the 0.93 MGD capacity available for GWSD customers. The existing WWTP capacity would be sufficient to accept wastewater generated by the proposed project. In addition, GWSD has indicated it has the capability to provide wastewater treatment services for the proposed project (Appendix K). Therefore, the proposed project is anticipated to result in a determination by GWSD that GWSD has adequate capacity to serve the proposed project in addition to existing demands. This impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 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?
Threshold 5:	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact USS-4 DEMOLITION AND CONSTRUCTION ACTIVITIES WOULD GENERATE AN ESTIMATED 193 TONS OF NONRECYCLABLE SOLID WASTE, WHICH WOULD NOT EXCEED THE CITY'S CONSTRUCTION AND DEMOLITION SOLID WASTE THRESHOLD OF 350 TONS. DURING OPERATION, THE PROPOSED PROJECT WOULD GENERATE APPROXIMATELY 69 TONS OF SOLID WASTE PER YEAR, WHICH WOULD NOT EXCEED THE CITY'S THRESHOLD OF 196 TONS PER YEAR. IMPACTS RELATED TO SOLID WASTE WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Demolition and Construction

The proposed project would generate solid waste from the demolition of existing on-site structures and construction of the proposed residential development. The structures that would be demolished total 3,893 square feet. In addition, the proposed project would result in the construction of approximately 163,920 square feet of residential development. Based on a solid waste generation factor of 100 pounds per square foot for demolition, the demolition of existing structures would result in approximately 194 tons of debris. Based on a solid waste generation factor of 4.38 pounds per square foot for construction (USEPA 1998), the construction of the proposed project would generate approximately 358 tons of debris. In total, demolition and construction activities together would

generate approximately 552 tons of solid waste.[2] With the 65 percent demolition and construction waste recycling required by CalGreen Title 21 Part 11 Section 4.408.1 and Chapter 8.10 of the Goleta Municipal Code, demolition and construction would result in approximately 193 tons of solid waste that would require use of a landfill. This amount of nonrecyclable waste would not exceed the City's project specific demolition and construction threshold of 350 tons. Therefore, the proposed project's demolition and construction activities would have a less than significant impact related to generating excessive solid waste and compliance with state and local solid waste management and reduction statutes.

Operation

Solid waste generation from project operation is calculated based on a waste generation factor of 0.95 tons per year per residence multiplied by the average number of people per unit, consistent with the County's 2024 *Environmental Thresholds and Guidelines Manual*. The City has an average of 2.59 persons per household (California Department of Finance 2025). Based on this factor, the proposed project would result in a gross solid waste generation rate of 138 tons per year.[3] With a 50 percent solid waste diversion rate required by AB 939, this solid waste generation would be reduced to 69 tons per year. This amount of solid waste does not exceed the City's project-specific threshold of 196 tons per year. As a result, project operation would not result in excessive solid waste generation and would comply with solid waste management and reduction statutes. Therefore, the proposed project's operation would have a less than significant impact related to generating excessive solid waste and compliance with state solid waste management and reduction statutes.

Mitigation Measures

No mitigation is required.

4.13.4 Cumulative Impacts

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

Development of the cumulative projects in Goleta, and the residential development at the Glen Annie Golf Course (as detailed in Table 3-1) would add a total of approximately 1,534 residential units, 440,599 square feet of industrial space, and 163,930 square feet of commercial space which would increase water demand in the GWD service area. Using water demand rates for the County's 2024 *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 and constructed, is estimated at approximately 510 AFY. The estimated cumulative water demand of 510 AFY represents approximately 11.3 percent of the 2040 normal year water supply surplus, and approximately 17.5 percent and 21.2 percent of GWD's dry year one and dry year two water supply surpluses, respectively. GWD's UWMP identifies that, during years three through five of a drought, water supply and demand would be balanced with the implementation of water conservation measures. The GWD UWMP estimates a population project of 34,300 for Goleta by 2040 (GWD 2021). The City has an average of 2.59 persons per household (California Department of Finance 2025). Based on the addition of 534 residential units in addition to the proposed project's 56 residential units,

[2] 194 tons of construction debris + 358 tons of demolition debris = 552 tons combined construction and demolition debris
[3] 2.59 persons per household * 56 residential units * 0.95 tons per year per residence = 137.8 tons per year solid waste generation.

cumulative growth in Goleta would increase Goleta's population to 34,173 residents, which would be within the growth projections of the GWD UWMP.

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 to allocate a maximum 154.7 acre-feet of water to new or additional development in 2025 (GWD 2024b). The water demand associated with cumulative development is anticipated to exceed the 154.7 acre-feet allocation; however, all cumulative development would not request water allocations in 2025. GWD determines the available supply for the next year annually each December. Pursuant to the Goleta Water District Code, cumulative development may utilize GWD's permitted allocation on a first-come-first-serve basis each year that water supply is available. Each cumulative project would be required to obtain a Can and Will Serve letter from GWD, which would confirm that water supply available for that project. GWD is required to reevaluate its supplies annually to determine if it can continue to issue new water allocations. In the event GWD determines inadequate supplies are available to serve new projects in the future, GWD cannot release potable service water to new or additional service connections unless certain specific conditions are met. Beyond 2025, if GWD determines it cannot allocate water supply to new connections, only the cumulative development projects that receive a water supply allocation would be able to be constructed until additional water supplies become available, including through transfer of water supply from other water agencies or third parties via water wheeling.. Therefore, because development can only occur if water supplies to serve that development are available and allocated by GWD, cumulative development would not deplete GWD's projected water surpluses such that a substantial reduction in water supplies would occur. Therefore, cumulative development would have a less than significant impact related to having sufficient water supplies available during normal, dry, and multiple dry years.

Cumulative development in Goleta would also increase wastewater generation. Consistent with the wastewater generation factors used in the City of Goleta 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 161,668 gallons per day of wastewater, or approximately 0.16 MGD. This calculation assumes all residential units would generate 220 gallons of wastewater per unit per day. This wastewater generation represents approximately 6.1 percent of the remaining 2.63 MGD capacity available at GSD's WWTP. Therefore, cumulative development would have a less than significant impact related to exceeding a wastewater treatment provider's treatment capacity.

Cumulative development would introduce new structures which would require installation of stormwater infrastructure, the construction of which could cause potential environmental impacts such as habitat disruption, erosion, or water quality degradation. The construction of stormwater infrastructure must occur in compliance with applicable federal, state, and City water quality requirements, such as the Construction Stormwater General Permit and Chapter 13.04 of the City's Municipal Code. As described in Section 4.8, *Hydrology and Water Quality*, requirements include implementation of best management practices designed to minimize erosion and retain sediment on-site, and reduce the risk of spills, leaks, and off-site discharge of construction debris and waste. Nevertheless, construction of stormwater infrastructure near waterways could result in impairment of water quality within the waterways resulting in significant cumulative impacts related to stormwater infrastructure installation. The proposed project would include stormwater infrastructure, the environmental impacts of which are evaluated throughout this EIR. As described in Section 4.8, *Hydrology and Water Quality*, installation of the proposed project's stormwater

infrastructure would occur in compliance with the Construction Stormwater General Permit, Chapter 13.04 of the City's Municipal Code, and with implementation of Mitigation Measure BIO-5 to minimize the potential for pollutants associated with construction equipment used for stormwater infrastructure installation to leak or spill and degrade water quality in El Encanto Creek. Compliance with existing regulations, and implementation of Mitigation Measure BIO-5 would ensure the proposed project's contribution to significant cumulative impacts related to stormwater infrastructure installation would not be considerable.

Cumulative development would raise the demand for electricity and natural gas in the SCE, Central Coast Community Energy, and Southern California Gas (SCG) service areas. However, SCE and the Southern California Gas Company service a majority of southern California, while Central Coast Community Energy is available across the central coast of California. Cumulative development in Goleta represents approximately 0.05 percent of Central Coast Community Energy's service population, 0.004 percent of SCE's service population, and approximately 0.003 percent of the Southern California Gas Company's service population (Central Coast Community Energy 2025; SCE 2025; Southern California Gas Company 2025). Accordingly, the demand placed by cumulative development in Goleta compared to the respective service populations of SCE, Central Coast Community Energy, and/or Southern California Gas Company is not anticipated to result in substantial energy demand such that new SCE, Central Coast Community Energy, and/or Southern California Gas Company facilities would be required. Therefore, cumulative impacts related to requiring the relocation or reconstruction of new 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, Verizon and AT&T provide extensive telecommunications infrastructure in Goleta which ensures telecommunications coverage is provided citywide to serve cumulative development (Doggett 2025). Therefore, cumulative impacts related to requiring the relocation or reconstruction of new telecommunications facilities would be less than significant.

Cumulative development would increase solid waste generation, thereby reducing the capacity of the Tajiguas Landfill and potentially the Kettleman Hills Facility, if contaminated soil disposal is required. This is a potentially significant cumulative impact on solid waste. According to the County's 2024 *Environmental Thresholds and Guidelines Manual,* if solid waste generation exceeds 196 tons/year, it is considered to be cumulatively significant. If solid waste generation exceeds 40 tons per year, but is less than 196 tons/year, it is considered an adverse, yet less than significant, contribution to cumulative impacts to solid waste facilities. Solid waste generation from demolition and construction of the proposed project is estimated to be 193 tons, and the proposed project's operational solid waste is estimated to be 69 tons per year. Therefore, project construction and operation would have an adverse, but not considerable contribution to cumulative impacts related to generating excessive solid waste and compliance with federal, state, and local solid waste management and reduction statutes.

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4.14 Wildfire

This section identifies and evaluates issues related to wildfire in the context of the proposed project. The section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to wildfire; and potential impacts related to wildfire that would result from implementation of the proposed project. A Fire Safety Plan was prepared for the proposed project by Resolute Associates, LLC in June 2025 which is included as Appendix G of this EIR. The following analysis is based in part on this Fire Safety Plan.

4.14.1 Setting

a. Wildfire Fundamentals

A wildfire is an uncontrolled fire in an area of extensive combustible fuel, including vegetation and structures. Wildfires differ from other fires in that they take place outdoors in areas of grassland, woodlands, brushland, scrubland, peatland, and other wooded areas that act as a source of fuel, or combustible material. Buildings may become involved if a wildfire spreads to adjacent communities. The primary factors that increase an area's susceptibility to wildfire include slope and topography, vegetation type and condition, and weather and atmospheric conditions. Regions of dense dry vegetation, particularly in canyon areas and on hillsides, pose the greatest potential for wildfire risks. Additional factors that increase an urban area's susceptibility to wildfire are development patterns and density, building types, and building materials.

The effects of wildland fires can be catastrophic. In addition to stripping the land of vegetation and destroying natural resources, post-fire conditions leave exposed slopes and hillsides vulnerable to surface erosion and runoff. Soil exposed to intense heat may lose its capacity to absorb moisture and support life. Debris flows during post-fire rainy seasons can pose a risk to life and property and occur with little warning. Wildfires also have negative impacts on air quality. Exposure to smoke and particulate matter has immediate and long-term public health impacts; populations may suffer from eye irritations, respiratory problems, and complications to existing lung and heart conditions.

Wildfire has three basic elements: how and where its ignition occurred; how and why it moves across a landscape from its point of origin; and what the fire's nature is upon arrival at a location. In general, a fire's nature is defined by eight characteristics:

- Direction of the advance of the fire front
- Speed of the advance of the fire front (rate of spread)
- Mechanism causing the advance
- Duration at any one location
- Structure-related consumption of fuels
- Flame length
- Intensity
- Gaining control

A fire front's direction of travel is primarily determined by direction of prevailing winds, geographic aspect, and condition of the fuels in the advance direction of the fire. The speed of a fire front's advance is a result of conditions at the location of the currently burning material and at the lands in

the direction the fire is moving. As a fire advances, the overriding influences determining its speed are prevailing wind speed, terrain slope gradient, dominant fuel size classes, and fuel continuity.

Wildfires advance by two principal mechanisms - combustion resulting from radiant heating and remote ignition resulting from ember production. Fire stays at one location primarily due to the size class of the material being consumed. Grass formations are dominated by low volumes of very "fine" fuels and, depending on the level of dryness, can be consumed, with the fire advancing, in a matter of minutes. On the other hand, tree-dominated vegetation has substantially greater volumes of available fuel and a far greater amount of larger-sized fuel components. Fires can remain at these locations for days, often weeks, and sometimes months (on heavily wooded conifer sites)

Fires burn where fuels are available. In grassland and scrubland ecosystems, fire intensity and flame length are primarily influenced by the height, density, and continuity of fine fuels such as grasses and low shrubs. Taller or denser vegetation generally supports more intense and faster-moving fires. Fires in tree-dominated vegetation have a much more complex pattern of movement based primarily on the continuity (or "connectedness") of the fuels. In these stands, there are typically three distinct layers of fuels, arranged vertically - surface, stems and trunks, and the crown, which is composed of branches, twigs, and leaves. The continuity of fuels in both horizontal and vertical directions affect how a fire burns. If a fire enters a stand and is advancing only as a surface fire, it will continue this manner of advance if there is high horizontal fuel connectivity. However, if there is also a high degree of vertical continuity (provided by fuels referred to as "ladder fuels"), then a fire can move up into the tree crowns as well and burn fuels throughout the entire stand structure.

Flame lengths are generally determined by the volume of fuels burning, the amount of time to total consumption, and the height of the vegetation that is burning. Grassland produces flame lengths typically ranging from one to three feet. Flame lengths are at their maximum when the material is dry. Stands of brush can produce flame lengths from 4 to 10 feet. Native oak-dominated hardwood stands can generate 20- to 40-foot flame lengths, and stands of exotics, such as *Eucalyptus globulus* or *E. cinerea,* or dense conifer stands can generate flame lengths over 100 feet. Flame length determines the distance over which the fire can spread through radiant heating. [1]

The temperature of a wildfire is directly related to the amount of cellulosic material[2] available for consumption. Grasslands have very low amounts and attain lower temperatures but woodlands, characterized by large amounts of highly concentrated cellulosic material, can attain temperatures on the order of 1,800 degrees Fahrenheit.

Gaining control over a wildfire's behavior is the objective of response efforts. Grassland fires, burning a low fuel volume, consuming fuels at a rapid pace and burning in a single level, are the easiest to bring under control. On the other end, full spectrum fires that are burning high fuel volumes and involving the entire stand structure can require days, weeks, or even months to bring under complete control.

Wildland-Urban Interface

The Wildland Urban Interface (WUI) is the area where human development meets wildland vegetation, and it is typically characterized by a mix of residential, commercial, and natural land uses. The California Department of Forestry and Fire Protection (CAL FIRE) uses a combination of housing density, Fire Hazard Severity Zone (FHSZ) classification, and vegetation lifeform criteria for mapping

[1] Radiant heating in this context is the process by which heat and energy from a wildfire is spread to other fire fuels due to the proximity of those fuels to the open flames of the fire.
[2] Cellulosic material is plant material that is made of cellulose which provides structure and support to the plant.

WUIs as part of their Fire and Resource Assessment Program. The WUI is particularly vulnerable to wildfire because it combines the presence of human-built structures with the presence of combustible vegetation and other wildfire fuels. Pursuant to CAL FIRE, an area must meet all of the following criteria in order to be considered a WUI (CAL FIRE 2019):

- Minimum housing density of one unit per 20 acres
- In a moderate, high, or very high FHSZ
- Not dominated by wildland vegetation (herbaceous, hardwood, conifer, shrub)

The Wildland Urban Intermix is a similar term commonly used interchangeably with WUI, although it is typically represented by areas with much higher vegetation density among built infrastructure. Pursuant to CAL FIRE, an area must meet all of the following criteria in order to be considered Wildland Urban Intermix (CAL FIRE 2019):

- Areas not designated WUI
- Minimum housing density between one unit per 20 acres and one unit per five acres OR greater than one unit per five acres in areas dominated by wildland vegetation
- In a moderate, high, or very high FHSZ
- Includes improved parcels only

CAL FIRE has also identified Wildfire Influence Zones as wildfire-susceptible vegetation up to 1.5 miles from areas designated as a WUI or Wildland Urban Intermix (CAL FIRE 2019). These zones essentially serve as a buffer to these two designations.

The project site is within the City of Goleta in Santa Barbara County. The City of Goleta Community Wildfire Protection Plan (CWPP) defines the WUI as "a line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland and vegetative fuels" (City of Goleta 2012). As described in the City's CWPP, the project site is considered part of the occluded interface[3] due to its nature as an area of vegetated open space within a developed area (City of Goleta 2012). Specifically, the project site is surrounded by the Glen Annie Golf Course to the north and east; El Canto Creek, Northgate Road, and multi-family residential development to the west; and Cathedral Oaks Road and single-family residences to the south. Most of the land north of the project site is classified as a very high FHSZ within an SRA (CAL FIRE 2024b).

b. Wildfire-Conducive Conditions

Santa Barbara County is known for its temperate Mediterranean climate with consistent periods of prolonged drought. The local weather patterns, combined with the adjacent steep mountains dominated by seasonally flammable grasses and chaparral, provide conditions in which wildfire can occur (Santa Barbara County Fire Safe Council 2025).

Vegetation

Vegetation is fuel for wildfire and it changes over time with seasonal growth and die-back. The relationship between vegetation and wildfire is complex, but generally some vegetation is naturally fire-resistant, while some vegetation is extremely flammable. For example, cured grass is much more flammable than standing trees. Grass is considered an open fuel, in which oxygen has free access to promote the spread of fire. Additionally, weather and climate conditions, such as drought, can lead

[3] This designation indicates the project site is subject to elevated wildfire risk despite its urbanized context.

to increasingly dry vegetation with low moisture content and, thus, higher flammability. The project site primarily contains non-native ruderal vegetation (e.g., weeds and grasses) which are periodically mowed and nonnative weedy vegetation as described in greater detail in Section 4.3, *Biological Resources*.

Slope, Elevation, and Aspect

Slope can determine how quickly a fire spreads. Fire typically burns faster uphill, because it can pre-heat the fuels above with rising hot air, and upward drafts are more likely to create fire spots (National Park Service 2017). Areas containing steep, rugged terrain can also hinder access and the use of heavy firefighting equipment, posing additional difficulties for firefighting efforts (CAL FIRE 2024a). Following severe wildfires, sloping land is also more susceptible to landslide or flooding from increased runoff during substantial precipitation events. Landslides and surficial slope failure are most likely to occur in areas with more than 25 percent slope (hillside areas) and along steep bluffs.

Elevation affects fire behavior by influencing the timing and amount of precipitation as well as exposure to prevailing winds. Aspect is the direction a slope faces, which determines how much radiated heat the slope receives from the sun. Slopes facing south to southwest receive the most solar radiation; thus, they tend to be warmer and the vegetation drier than on slopes facing a northerly to northeasterly direction, creating a higher potential for wildfire ignition and spread (University of California Berkeley 2018).

The project site primarily slopes north to south, with moderate sloping on the western end of the project site toward El Encanto Creek. The existing elevation on the project site ranges from 145 feet above mean sea level at the lowest point along Cathedral Oaks Road to 252 feet above mean sea level at the highest point along the northeast corner of the project site. A distinct break in topography (downslope) occurs near the eastern and southern boundaries of the project site.

Climate and Weather

Wind, temperature, and relative humidity are the most influential weather elements in fire behavior and susceptibility (National Park Service 2017). Fire moves faster under hot, dry, and windy conditions. Wind may also blow embers ahead of a fire, causing its spread. In addition, drought conditions lead to extended periods of excessively dry vegetation, increasing the fuel load and ignition potential.

A local meteorological phenomenon, sundowner winds, pose a unique wildfire risk within the City. These winds are usually associated with a rapid rise in temperature and a decrease in relative humidity (City of Goleta 2012). Sundowner winds are most common in the summer and the strongest of these winds channel east of Santa Ynez Peak and Glen Annie Canyon which lead directly into the City of Goleta (City of Goleta 2012). They also most commonly start or strengthen in the evening.

In Santa Barbara County, fire season typically begins in early to late spring and extends through the end of the year. The peak fire risk occurs in late summer and fall when vegetation is driest and offshore winds, either local sundowner winds or an area-wide Santa Ana, can rapidly spread wildfires. Even in November and December, wildfire potential remains high due to continued dry fuels and strong seasonal winds.

There are local and regional wind influences that influence fire behavior within the city of Goleta. Diurnal winds are local wind patterns that occur daily due to differences in heating and cooling between the land and atmosphere, especially in mountainous or coastal areas. The term diurnal just means “daily” (i.e., occurring within a 24-hour cycle). A sea breeze is a local, daytime coastal wind

that blows from the ocean (cooler surface) toward the land (warmer surface). It is caused by differential heating between land and water during the day. Sundowner winds are localized, downslope, offshore winds that occur when high pressure inland pushes air down the Santa Ynez Mountains toward the ocean, through narrow canyons and passes. The air compresses and warms as it descends. Santa Ana winds are regional, strong, dry winds that flow from northeast to southwest across Southern California, driven by high pressure over the Great Basin and low pressure off the coast. Air is funneled through mountain passes.

Wildfire risk is highest in Goleta in the late summer and early fall months and can be exacerbated by wind conditions during these times of year. For the months of May through August, early morning winds can be variable but typically are from the north or northwest. These winds are most commonly between one to four miles per hour but can reach speeds over 40 miles per hour. Late morning to early afternoon winds typically blow from the south, southeast, or southwest with wind speeds of one to eight miles per hour. However, these winds can also reach speeds over 40 miles per hour. Late afternoon and evening winds typically start off from the south, southeast, or southwest and transition to the north or northwest. Winds are typically 1-8 miles per hour but can reach up to 40 miles per hour during this time.

For the months of September through December, the early morning winds are typically from the north or northeast. Wind speeds typically are between 1-8 miles per hour but can reach up to 40 miles per hour during this period. Late morning to early afternoon winds are typically blow from the south or southwest. Wind speeds typically are between one to 13 miles per hour, but speeds can reach up to 40 miles per hour during this period. Late afternoon into evening winds can be variable but tend to blow toward the northwest or northeast. Winds are typically between one to four miles per hour but can reach speeds over 40 miles per hour during this time.

Power Lines

Above-ground power lines have the potential to contribute to wildfire risk, especially when they are near or cross wilderness areas. In some instances, high winds can blow nearby trees and branches into power lines, sparking fires. Wind can also snap wooden poles, causing live wires to fall onto nearby grass or other fuel, igniting it. While the California Public Utilities Commission estimates only about 10 percent of California's wildfires are triggered by power lines, the frequency and severity of these wildfires has spurred the agency to promulgate new requirements for power line safety practices (Atkinson 2018).

There are no existing overhead power lines on or immediately adjacent to the project site; however, there are large 66 kilovolt electrical transmission lines in the general vicinity of the project site and throughout the city.

c. Wildfire Hazard Designations

In California, state and local agencies share responsibility for wildfire prevention and suppression, and federal agencies take part as well. Federal agencies are responsible for oversight of federal lands in Federal Responsibility Areas. The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of statewide interest and have classified those lands as State Responsibility Areas (SRA). CAL FIRE manages SRAs. All incorporated areas and unincorporated lands not in Federal Responsibility Areas or SRAs are classified as Local Responsibility Areas (LRA).

While nearly all of California is subject to some degree of wildfire hazard, there are specific features that make certain areas more hazardous. CAL FIRE is required by law to map areas of high fire hazards based on fuels, terrain, weather, and other relevant factors (Public Resources Code [PRC]) Sections 4201 through 4204; California Government Code Sections 51175-89). As described previously, the primary factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. CAL FIRE maps fire hazards as zones, referred to as fire hazard severity zones (FHSZ). There are three levels of severity – moderate, high, and very high. A very high FHSZ reflects an elevated risk of fast-moving and intense wildfires, whereas the high FHSZ designation also signifies substantial wildfire risk, though generally less extreme than the "Very High" designation. As of January 2022, California law requires CAL FIRE to map the moderate and high FHSZ in addition to the very high FHSZ for LRAs. The most recent CAL FIRE SRA maps were released in April 2024 and the most recent LRA maps were released in March 2025. The City of Goleta adopted the LRA CAL FIRE maps into the City's Municipal Code in June 2025.

Each of the FHSZs influence how people construct buildings and protect property to reduce risk associated with wildland fires. Under state regulations, areas within very high FHSZs must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life in those areas. However, none of the fire zones specifically prohibit development or construction. To reduce fire risk under state regulations, areas in very high FHSZs must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life in those areas.

As shown in Figure 4.14-1, the project site is within an LRA, where fire protection services are typically provided by local agencies rather than CAL FIRE. The majority of the project site is classified as a very high FHSZ; the southeast corner of the project site is classified as a high FHSZ.

Fire History

While the City of Goleta has not experienced a substantial wildfire within city limits in recent years, in 2017 the Whittier fire burned in the Santa Ynez Mountains towards the City of Goleta. The Whittier fire burned 18,430 acres and destroyed 16 residences and 30 outbuildings (Santa Barbara County Fire Safe Council 2025). The edge of this fire was approximately two miles from the project site. Additionally, in 2018 the Thomas Fire burned approximately 281,893 acres in southern Santa Barbara County. This fire burned approximately five miles from the project site.

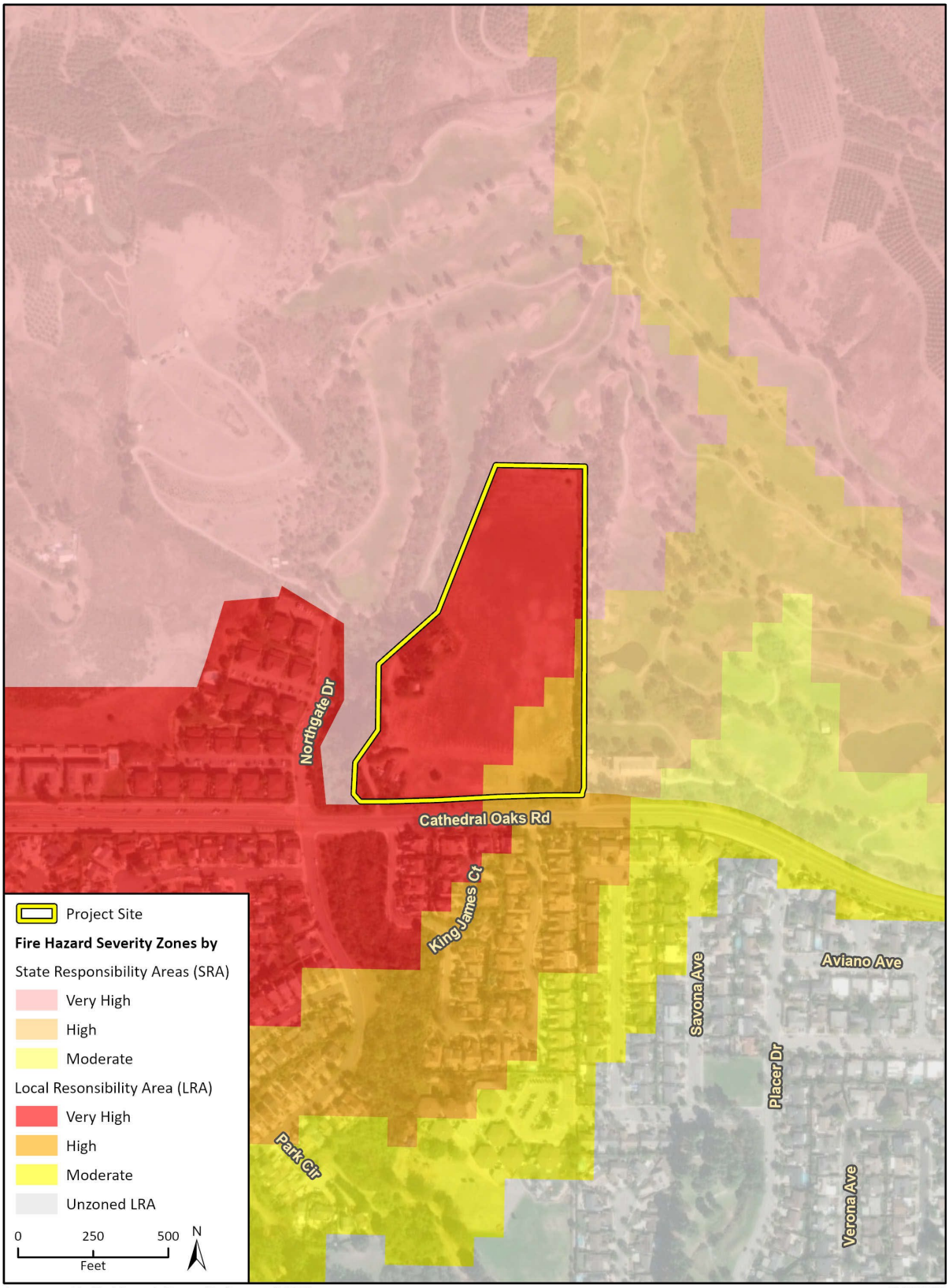
As described above, the project site is classified as a very high FHSZ with the southeast corner of the classified as a high FHSZ. There are also areas north of the site, outside the City limits that are within very high FHSZs in an SRA. There have been no recorded fires that have burned within the project site.

d. Post-Fire Slope Instability and Drainage Pattern Changes

Vegetation loss from wildfire scarring of the landscape can result in slope instability in the form of more intensive flooding and landslides. These post-fire slope soils and altered drainage patterns can result in soil creep on downslope sides of foundations and reduce lateral support.

A downslope occurs near the eastern and southern boundaries of the project site. As described in Section 4.5, *Geology and Soils*, the northern portion of the project site is mapped within an area of high landslide potential.

Figure 4.14-1 Fire Hazard Severity Zones in Project Site Vicinity



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25-18152 EPS
Fig X Fire Hazard Severity Zone

e. Fire Protection Services

The City of Goleta is served by the Santa Barbara County Fire Department (SBCFD). SBCFD has three fire stations within the City (Fire Station 11, 12, and 14). Santa Barbara County Fire Station 10 which would be located within the City is currently in the planning stages, but has not yet been built (City of Goleta 2025a). Fire Station 11 has six personnel on duty including two captains, two engineers, one firefighter and one firefighter/paramedic. This station is also a Water Rescue Station and home to the Urban Search and Rescue vehicle and team members (SBCFD 2025a). Fire Station 12 has three personnel on duty: one captain, one engineer, and one firefighter (SBCFD 2025b). Fire Station 14 has three personnel on duty: one captain, one engineer, and one firefighter. It is also an Advanced Life Support paramedic staffed station (SBCFD 2025c). Figure 4.14-2 shows the project site in relation to the three fire stations within the city. As shown therein, the closest fire station is Fire Station 11, which is approximately 1.4 miles from the project site.

As discussed in the Fire Safety Plan prepared for the project, the response time goal for the SBCFD is 7 minutes for urban areas and 8 minutes for suburban areas (Appendix G). While the travel time from the new proposed Fire Station 10 would be within this goal, the travel time from the closest existing fire station (Fire Station 11) is six minutes which is over the response time goal by one minute for suburban areas.

f. Evacuation

The Transportation Element of the City of Goleta General Plan (City of Goleta 2025b) designates the following roadways as critical transportation facilities for emergency vehicle access and emergency evacuation:

- United States Route 101
- State Route 217
- Cathedral Oaks Road
- Hollister Avenue

Additionally, the Transportation Element mentions that major north-south arterials that connect portions of the city on either side of United States Route 101 are critical transportation facilities. While not called out by name in the Transportation Element, the Safety Element includes Figure 5-4 which shows potential evacuation routes in the city including the following major north-south arterials (City of Goleta 2025c):

- North Glen Annie Road
- Storke Road
- North Los Carneros Road
- South Los Carneros Road
- North Fairview Avenue
- North Patterson Avenue
- South Patterson Avenue

Figure 4.14-2 Fire Stations within the City of Goleta



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25-18152 EPS
Fig X Fire Stations

4.14.2 Regulatory Setting

a. Federal Regulations

Disaster Mitigation Act

The Disaster Mitigation Act of 2000 provided a new set of mitigation plan requirements for state and local jurisdictions that encourage them to coordinate disaster mitigation planning and implementation. States are encouraged to complete either a "Standard" or "Enhanced" Natural Mitigation Plan. Enhanced plans demonstrate increased coordination of mitigation activities at the state level and, if completed and approved, increase the amount of federal funding available through the Hazard Mitigation Grant Program. The State of California Multi-Hazard Mitigation Plan (SHMP) complies with this act.

National Fire Plan

The National Fire Plan was developed in response to Executive Order 11246 in August 2000, following a historic wildland fire season. Its intent was to establish plans for active response to severe wildland fires and their impacts to communities, while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation hazardous fuels reduction, community assistance, and accountability. The plan promotes close coordination among local, state, tribal, and federal firefighting resources by conducting training, purchasing equipment, and providing prevention activities on a cost-share basis. To help protect people and their property from potential catastrophic wildfire, the National Fire Plan directs funding to be provided for projects designed to reduce the fire risks to communities. High-risk communities identified in the wildland-urban interface, the area where homes and wildlands intermix, were published in the Federal Register in 2001. At the request of Congress, the Federal Register notice only listed those communities neighboring federal lands. CAL FIRE incorporates concepts from this plan into state fire planning efforts.

b. State Regulations

California Code of Regulations, Title 14

The California Code of Regulations, Title 14, Division 1.5 provides fire safe regulations related to emergency access, address signage, and water standards. These regulations establish minimum wildfire protection standards for construction and development within the SRA and very high FHSZs. The standards include basic emergency access and perimeter wildfire protection measures, signage and building numbering, water supply resources for emergency fire use, and vegetation modification. They also include a minimum setback of 30 feet for all buildings from property lines and/or the center of a road and provide defensible space requirements for areas within 30 feet of a structure (Zone 1) and between 30 and 100 feet from a structure (Zone 2).

California Fire Code

The California Fire Code (CFC) is Chapter 9 of California Code of Regulations Title 24 and is based on the International Fire Code. The CFC 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. The CFC uses 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 CFC employs a permit system based on hazard classification.

More specifically, CFC Chapter 8 addresses fire-related interior finishes; Chapter 9 addresses fire protection systems; and Chapter 10 addresses fire-related means of egress. CFC Chapter 35 addresses fire safety during welding or other hot work. CFC Chapter 49 also contains regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings in FHSZs in SRAs, LRAs, and WUI fire areas.

California Building Code: Wildland-Urban Interface Building Standards

On September 20, 2007, the California Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending the California Code of Regulations, Title 24, Part 2, known as the California Building Code (CBC), to include wildland-urban interface standards. The provisions of the CBC 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. The wildland-urban interface standards include provisions for ignition-resistant construction standards in the wildland-urban interface and use a hazard classification system to determine what protective measures are required to ensure fire safety and protect lives. Specifically, CBC Chapter 7A addresses materials and construction methods for exterior wildfire exposure.

CAL FIRE Strategic Fire Plan

The 2024 Strategic Plan prepared by CAL FIRE lays out central goals for reducing and preventing the impacts of fire in the state. The goals are meant to establish a natural environment that is more resilient and human-made assets that are more resistant to the occurrence and effects of wildland fire through local, state, federal, and private partnerships (CAL FIRE 2024a).

California Multi-Hazard Mitigation Plan

The California Governor's Office of Emergency Services (Cal OES) prepares the SHMP, which identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy for the state (Cal OES 2023). The SHMP is required under the Disaster Mitigation Act of 2000 for the State to receive federal funding through the Hazard Mitigation Grant Program and disaster assistance. The SHMP represents the state's primary hazard mitigation guidance document, providing an updated analysis of the state's historical and current hazards, hazard mitigation goals and objectives, and hazard mitigation strategies and actions. The SHMP represents the State's overall commitment to supporting a comprehensive mitigation strategy to reduce or eliminate potential risks and impacts of disasters in order to promote faster recovery after disasters and, overall, a more resilient state. SHMPs are required to meet the elements outlined in the Federal Emergency Management Agency's State Mitigation Plan Review Guide.

Cal OES is responsible for the development and maintenance of the State's plan for hazard mitigation. The State's SHMP was last approved by the Federal Emergency Management Agency as an Enhanced State Mitigation Plan in 2023. The plan is designed to reduce the effects of disasters caused by natural, technological, accidental, and adversarial/human-caused hazards. The SHMP sets the mitigation priorities, strategies, and actions for the state. The plan also describes how risk assessment and mitigation strategy information is coordinated and linked from local mitigation plans into the SHMP

and provides a resource for local planners to obtain risk information that may affect their planning area. The State of California is required to review and revise its mitigation plan and resubmit for Federal Emergency Management Agency approval at least every five years to ensure continued funding eligibility for certain federal grant programs.

State Emergency Plan

The foundation of California's emergency planning and response is a statewide mutual aid system, designed to ensure adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with an emergency situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555 through 8561) requires signatories to the agreement to prepare operational plans to use in their jurisdiction and outside their area. These operational plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all state agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

The State of California Emergency Plan describes how response to natural or human-caused emergencies occurs in California. The plan is a requirement of the California Emergency Services Act and describes methods for conducting emergency operations, the process for rendering mutual aid, emergency services of government agencies, how resources are mobilized, how the public is informed, and how continuity of government is maintained during emergency. The Plan further describes hazard mitigation (actions to reduce risk), as well as preparedness and recovery from disasters (Cal OES 2024).

California Government Code Section 8568, the California Emergency Services Act, states "the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof." The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the Act are further reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by California Government Code Section 8607(a) for managing emergencies involving multiple jurisdictions and agencies. The SEMS incorporates the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and State. Cal OES divides the state into several mutual aid regions. The project site is located in the Southern Region, currently coordinated by interim regional administrator Sherri Sarro (Cal OES 2025).

California Public Resource Code

The California PRC includes fire safety regulations for forest, range, and forage lands 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:

- On days when a burning permit is required, flammable materials shall be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and fire suppression equipment shall be available in the immediate area (PRC Section 4427)
- During the highest fire danger period from April 1 to December 1, no person except for an emergency crew member or those under or contracted with a publicly or privately-owned utility shall use tools powered by an internal combustion engine in any industrial operation located on or near any forest, brush, or grass-covered land, and appropriate fire suppression equipment shall be made immediately available (PRC Section 4428)
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines shall not be used within 25 feet of any flammable materials (PRC Section 4431)
- 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)

In addition, PRC Section 4290 establishes minimum wildfire protection standards in conjunction with building, construction, and development in SRAs and very high FHSZs in LRAs. Under PRC Section 4290, the design and construction of structures, subdivisions, and developments in SRAs must provide for basic emergency access and specified perimeter wildfire protection measures. These measures provide road standards for emergency access, signing and building numbering, water supply reserves, and fuel breaks and greenbelts and are known as the State Minimum Fire Safe Regulations.

California Building Code and California Residential Code

Chapter 7A of the CBC and Chapter R337 of the California Residential Code contain standards associated with the construction of buildings in wildfire prone areas. Specifically, these codes include regulations for materials and methods used in construction to establish minimum standards for the protection of life and property by increasing the ability of a building located in any WUI to resist the intrusion of flame or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses.

Executive Order N-05-19

On January 9, 2019, Governor Gavin Newsom issued Executive Order N-05-19 to address wildfire in California. Executive Order N-05-19 directs CAL FIRE, in consultation with other state agencies and departments, to recommend immediate-, medium-, and long-term actions to help prevent destructive wildfires. In response, CAL FIRE created the Community Wildfire Prevention and Mitigation Report, which contains recommendations to reduce the damage from wildfires across the state.

Government Code Section 51182

According to California Government Code Section 51182, a person who owns, leases, controls, operates, or maintains an occupied dwelling or occupied structure in, upon, or adjoining a mountainous area, forest-covered land, brush-covered land, grass-covered land, or land that is

covered with flammable material, or land that is in a very high FHSZ shall, at all times, do all of the following:

1. Maintain defensible space of 100 feet from each side and from the front and rear of the structure.
2. Remove that portion of trees that extends within 10 feet of the outlet of a chimney or stovepipe.
3. Maintain trees, shrubs, or other plants adjacent to or overhanging a building free of dead or dying wood.
4. Maintain the roof of a structure free of leaves, needles, or other vegetative materials.
5. Prior to constructing a new dwelling or structure that will be occupied or rebuilding an occupied dwelling or occupied structure damaged by a fire in that zone, the construction or rebuilding of which requires a building permit, obtain a certification from the local building official that the dwelling or structure, as proposed to be built, complies with all applicable state and local building standards.

Senate Bill 1241

Senate Bill 1241 requires cities and counties in SRAs and very high FHSZs to address fire risk in the safety element of their general plans and requires the California Office of Planning and Research to develop guidelines in conjunction with CAL FIRE to ensure wildfire risk is adequately evaluated under the California Environmental Quality Act (CEQA). Senate Bill 1241 also resulted in amendments to the CEQA Guidelines in 2018 to include questions related to fire hazard impacts for projects located in or near lands classified as SRAs and very high FHSZs. In adopting these amendments, the California Office of Planning and Research recognized low-density, leapfrog development may create higher wildfire risks than high-density, infill development.

Senate Bill 1028

Senate Bill 1028 requires each electrical corporation to construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those components, and makes a violation of these provisions by an electrical corporation a crime under state law. The bill also requires each electrical corporation to annually prepare a wildfire mitigation plan submitted to the California Public Utilities Commission for review. The plan must include a statement of objectives, a description of preventive strategies and programs that are focused on minimizing risk associated with electric facilities, and a description of the metrics the electrical corporation uses to evaluate the overall wildfire mitigation plan performance and assumptions that underlie the use of the metrics.

Assembly Bill 2911

Following the devastating 2017 fire season, Assembly Bill 2911 was adopted to improve fire safety in subdivision developments. Assembly Bill 2911 requires the State Board of Forestry and Fire Protection, in consultation with the State Fire Marshal, to survey local governments, including counties, cities, and fire districts, to identify existing subdivisions located in SRAs or very high FHSZs that are without a secondary means of egress route and are at high fire risk. Through this Subdivision Review Program, the State Board of Forestry and Fire Protection works with local governments and agencies on a project-by-project basis to develop recommendations to create secondary access to the subdivision, improvements to existing access roads, and other fire safety measures.

Assembly Bill 747

Assembly Bill 747 requires local hazard mitigation plans and safety elements of general plans to be reviewed and updated, as necessary, to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. Assembly Bill 747 authorizes a city or county that has adopted a local hazard mitigation plan, emergency operations plan, or other document that fulfills commensurate goals and objectives to use that information in the safety element of the general plan to comply with this requirement by summarizing and incorporating by reference that other plan or document in the safety element.

Senate Bill 99

Senate Bill 99 requires that, during the next housing element revision, safety elements of general plans be reviewed and updated to identify residential developments in any hazard area that do not have at least two evacuation routes.

c. Local Regulations

City of Goleta General Plan/Coastal Land Use Plan

The Safety Element of the City of Goleta General Plan/Costal Land Use Plan, which was most recently updated in August 2025 (City of Goleta 2025d) includes the following policies related to wildfire that are applicable to the project:

- **SE 7.1: Fire Prevention and Response Measures for New Development:** New development and redevelopment shall be designed and constructed in accordance with more current State and Santa Barbara County fire protection building standards. The City shall require new subdivisions in the Very High Fire Hazard Severity Zone to have: 1) Secondary access available, or mitigations and/or management plans are required that offset the known risks; 2) A Wildfire Protection Plan prepared and approved by the County of Santa Barbara Fire Department; and 3) An appropriate setback from wildland vegetation, as determined by the County of Santa Barbara Fire Department.
- **SE 7.2: Review of New Development:** Applications for new or expanded development shall be reviewed by appropriate Santa Barbara County Fire Department personnel to ensure they are designed in a manner that reduces the risk of loss due to fire. Such review shall include consideration of the adequacy of "defensible space" around structures at risk; access for fire suppression equipment, water supplies, construction standards; and vegetation clearance. Secondary access may be required and shall be considered on a case-by-case basis. The City shall encourage built-in fire suppression systems such as sprinklers, particularly in high-risk or high-value areas.
- **SE 7.4: Fuel Modification Plans:** Applications for new development that require fuel modification shall include a Fuel Modification Plan for the project. This plan shall be prepared by a landscape architect or resource specialist and shall include Fire Department Engine Responding to a Wildfire Source: Santa Barbara County Fire Department 2003 Goleta General Plan /Coastal Land Use Plan 5.0 Safety Element September 2006 5-25 measures to minimize removal of native vegetation, minimize disturbance to environmentally sensitive habitat areas (ESHAs), and incorporate fire-retardant vegetation in new plantings. Such plans shall be reviewed and approved by the Santa Barbara County Fire Department.

The Public Facilities Element of the Goleta General Plan (City of Goleta 2025e) includes the following policy that is applicable to the proposed project:

- **PF 3.3: Impact Fees for Fire Protection Facilities/ Equipment:** Construction of the new Fire Station 10 shall be funded in part by revenues from an impact fee imposed on new development within the city, as well as upon development in the nearby unincorporated areas. Such fees may also be imposed for upgrades of existing fire stations and for new fire apparatus.
- **PF-3.4: Fire Safety In New Development:** The following fire safety standards shall be met, where applicable, in new development within the city:
    a. Two routes of ingress and egress shall be required for any new development or subdivision of land requiring approval of a discretionary action. This requirement may be waived by the City when secondary access cannot be provided and maintenance of fire safety standards are ensured by other means.
    b. All private roads that provide access to structures served by the Santa Barbara County Fire Department shall be constructed at a minimum to the department's standards.
    c. All nonagricultural development in the foothills area shall include provisions for connection to the GWD or another public water purveyor.
    d. Emergency access shall be a consideration in the siting and design of all new development within the city.

City of Goleta Community Wildfire Protection Plan

The City of Goleta CWPP, which was adopted in 2012, is intended to guide future activities to reduce the threat of wildfire in the city. The CWPP includes mitigation actions related to defensible space and construction materials to reduce structure ignitability. Additionally, the CWPP includes development standards to ensure that new developments incorporate wildfire prevention measures. These development standards include requirements for driveways and private roads, stored water fire protection systems, defensible space standards, access gates, and fire hydrant spacing and flow rates (City of Goleta 2012).

Additionally, the CWPP identifies the project site as a privately owned vegetation management unit. The CWPP includes vegetation management guidance which includes following defensible space requirements set forth in California PRC Section 4291 and utilizing fuel treatment strategies such as mowing and thinning vegetation to reduce the risk of wildfire (City of Goleta 2012).

City of Goleta Municipal Code

Section 17.32.060 of the Municipal Code includes fire protection measures for new structures. Specifically, this section requires new structures to be sited, designed, and constructed in accordance with the National Fire Protection Association standards to minimize fire hazards. Special attention must also be given to fuel management and improved access in areas with higher fire risk, with access or water supply deficiencies, or beyond a five-minute fire response time. This section of the municipal code also includes requirements for fire fuel modification plans and requires the installation of automatic fire sprinklers.

Additionally, Chapter 15.01 of the Municipal Code includes the building code which requires buildings within the city to meet requirements set by the CBC, including Chapter 7A as described under State Regulations above.

Chapter 17.70 of the Municipal Code requires the payment of development impact fees to fund new or rehabilitated public services facilities.

City of Goleta Emergency Operations Plan

The City of Goleta Emergency Operations Plan, adopted in 2023, is intended to guide the City's response to major emergencies and disasters, including wildfire. It includes an organizational structure for emergency responders, including coordination with agencies outside of the city.

Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan

The Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (HMP) contains goals and objectives that are intended to reduce loss of life and property from natural disasters. The HMP was comprehensively updated in 2023, and the City is a participating agency. During the planning process, this plan used Federal Emergency Management Agency tools to determine the most likely possible threats would be wildfire, earthquakes, drought and water shortage, pandemic/public health emergency, energy shortage and resiliency, extreme heat and freeze, and flooding. The HMP identifies mitigation action items that aim to meet objectives and reduce the impacts of these hazards. The Santa Barbara County Office of Emergency Management leads the responsibility for overseeing the Plan implementation and maintenance strategy. Plan implementation and evaluation will be a shared responsibility among all planning partnership members and agencies identified as lead agencies in the mitigation action plans.

Santa Barbara County Fire Department Development Standards

SBCFD has adopted development standards for projects within their jurisdiction. These standards set forth requirements that would be applicable to the proposed project such as those for roadways and driveways, fire hydrant spacing and flow rates, store water fire protection systems, single-family residential fire sprinkler systems, and defensible space (SBCFD 2023).

4.14.3 Impact Analysis

4.14.3.1 Methodology and Significance Thresholds

Methodology

Impacts related to wildfire hazards and risks were evaluated using FHSZ mapping for the City of Goleta, aerial imagery, and topographic mapping. In addition, weather patterns related to prevailing winds and precipitation trends were evaluated as they relate to the spread and magnitude of wildfire. Additionally, a Fire Safety Plan was prepared for the proposed project by Resolute Associates, LLC in June 2025, which is included as Appendix G of this EIR. The following analysis is based in part on this Fire Safety Plan.

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. Accordingly, CEQA does not require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents. As a result wildfire impacts under the thresholds identified below would only be considered significant if the proposed project risks exacerbating those existing environmental conditions.

Significance Thresholds

The following thresholds are based on Appendix G of the *CEQA Guidelines. A* which provides the following to determine if a project would have a potentially significant impact related to wildfire. If located in or near SRAs or land classified as very high FHSZs, would the project:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan;
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

4.14.3.2 Project Impacts and Mitigation Measures

Threshold 1:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact W-1 THE PROJECT SITE IS LOCATED ON LANDS CLASSIFIED AS A VERY HIGH FHSZS IN AN LRA AND IS NEAR LANDS CLASSIFIED AS A VERY HIGH FHSZ IN AN SRA. THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY IMPAIR AN ADOPTED EMERGENCY EVACUATION PLAN OR EMERGENCY OPERATION PLAN DUE TO THE PROJECT LOCATION, DESIGN, AND THE EXISTING CAPACITY OF CATHEDRAL OAKS ROAD WHICH IS THE NEAREST EVACUATION ROUTE TO THE PROJECT SITE. COMPLIANCE WITH EXISTING REGULATIONS AND POLICIES WOULD ENSURE IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.

Construction

As described in Section 4.11, *Transportation and Circulation*, construction activities may require temporary lane closures within the public right-of-way along Cathedral Oaks Road to complete frontage improvements and utility work. Cathedral Oaks Road serves as a primary east-west arterial in the city of Goleta and is designated as a critical transportation facility due to its role in facilitating emergency access and evacuation. Temporary lane closures during construction could result in reduced roadway capacity, localized congestion, and slower travel speeds, particularly at intersections or segments with limited alternative routing. These disruptions may also affect signal timing, turning movements, and access for large emergency vehicles, depending on the configuration of the work zone. These disruptions may delay emergency response times and impede evacuation flow, especially if closures coincide with high-risk periods or if detour routes are themselves constrained.

While these disruptions would be temporary during utility installation, in accordance with Chapter 12.02 of the City's Municipal Code, the project applicant would be required to maintain at least one safe crossing for vehicles and must implement measures to minimize disruption to existing traffic conditions. To ensure compliance with the City's Municipal Code, as a Condition of Approval, the project applicant's construction contractor would be required to prepare and implement a Construction Traffic Management Plan, which must specify transportation measures to be

implemented during construction on Cathedral Oaks Road to ensure disruptions to transit, roadway, bicycle, and pedestrian facilities are minimized. These measures include the use of traffic control measures for traffic safety; coordination with SBCFD; and coordination with concurrent construction projects within 0.25-mile of planned improvements on Cathedral Oaks Road to ensure temporary lane and/or roadway closures on Hollister Avenue are coordinated to limit overlap.

The requirement for a Construction Traffic Management Plan as a Condition of Approval introduces project-specific controls that directly address the types of disruptions anticipated. These include traffic control measures to preserve safety and flow, coordination with SBCFD to ensure emergency access is maintained, and coordination with other nearby construction projects to avoid overlapping closures. These measures are designed to preserve the functional capacity of Cathedral Oaks Road during construction, thereby minimizing the potential for substantial delays to emergency response or evacuation. Given the presence of multiple access points in the surrounding developed area, and the implementation of targeted traffic management strategies, construction of the proposed project is not expected to substantially impair emergency evacuation routes. With adherence to the City's existing municipal code regulations requiring the implementation of a Construction Traffic Management Plan, construction of the proposed project would have a less than significant impact related to impairing emergency evacuation.

Operation

The proposed project includes two ingress/egress points at the southwest and southeast edges of the project site which provide connection to Cathedral Oaks Road. It is estimated that the proposed project would result in up to 84 additional vehicles utilizing Cathedral Oaks Road as an evacuation route (Appendix G). This addition would not exceed the road's current capacity of 1,600 vehicles per hour. Furthermore, if Cathedral Oaks Road became impassable or reached capacity during an evacuation, vehicles from the project site could evacuate via Brandon Drive to Calle Real or Placer Drive and Ellwood Station to Calle Real. Additionally, the proposed project design includes internal roads that comply with fire department standards for widths and maneuvering for vehicles including fire trucks. This ensures that internal roadways constructed as part of the proposed project are adequate for evacuees, which further reduces the potential for the project to result in inadequate evacuation routes for future residents. Overall, project operation would have a less than significant impact related to impairing emergency evacuation.

While the proposed project would not impair emergency evacuation, SBCFD maintains a response time goal of eight minutes for suburban areas. This goal is a performance benchmark rather than a regulatory requirement, and slight deviations from it do not necessarily indicate a deficiency in emergency response service. The travel time from the closest fire station to the project site, Fire Station 11, is nine minutes (including a three-minute dispatch time), which is over the response time goal by one minute for suburban areas. However, the proposed project would not include any components that would result in further delays of SBCFD response times. As described above, the proposed project would result in up to 84 additional vehicles utilizing Cathedral Oaks Road, which would not result in substantial barriers to SBCFD response to the project site. Additionally, as described in Section 4.0.3.5, *Public Services,* of Chapter 4, *Environmental Impact Analysis,* the project applicant would be required to pay impact fees in accordance with the General Plan/Costal Land Use Plan Policy PF 3.3 and Municipal Code Chapter 17.70. These fees would support the construction of a proposed fire station located at 7952 Hollister Avenue, which would be closer to the project site. The total response time from this proposed fire station to the project site would be seven minutes, which is within the SBCFD response time goal for suburban areas (Appendix G). The proposed project itself

does not necessitate construction of Fire Station 10; rather, 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 adequate service in Goleta.

Given that the eight-minute response time is a goal rather than a mandated threshold, the proposed project would not include features that would substantially delay SBCFD response times, and the project applicant would contribute to ensuring adequate fire services are available in Goleta through the payment of development impact fees, the proposed project would not result in substantial delays to fire protection services. Therefore, operational impacts on emergency response and fire protection services would be considered less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Impact W-2 **THE PROPOSED PROJECT WOULD BE DESIGNED IN ACCORDANCE WITH REGULATIONS INCLUDED IN THE CFC, CBC, CALIFORNIA RESIDENTIAL CODE, THE CITY OF GOLETA GENERAL PLAN/COASTAL LAND USE PLAN, MUNICIPAL CODE, AND SBCFD DEVELOPMENT STANDARDS, WHICH WOULD ENSURE THE PROJECT WOULD NOT EXACERBATE WILDFIRE RISKS AND THEREBY WOULD NOT EXPOSE PROJECT OCCUPANTS TO POLLUTANT CONCENTRATIONS FROM A WILDFIRE OR THE UNCONTROLLED SPREAD OF A WILDFIRE. IMPACTS WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.**

Construction

The project site contains combustible materials on site including vegetation, woodchips, and firewood, as well as several vacant structures. The project would include the construction of 56 single-family dwellings on the site. During construction, there would be a temporary increase in human activity and potential ignition sources, including equipment that could create sparks, be a source of heat, or leak flammable materials. Heat or sparks from construction equipment, vehicles, and the use of flammable hazardous materials have potential to ignite adjacent vegetation and start a fire, especially during weather events that include low humidity and high wind speeds. However, construction of the proposed project would not include unique activities that could exacerbate fire risk, such as storage of high quantities of flammable liquids and fuels or use of temporary heating equipment.

In accordance with CFC Chapter 9, Section 3312, installation of an on-site water supply system would occur prior to the commencement of construction to provide water supply for firefighting in the event of a fire. Additionally, construction activities would include the use of safety equipment and procedures such as spark arresters, clearance around welding or other hot work, smoking restrictions, extinguishers, and charged water hoses and shovels nearby. These measures would interrupt ignition pathways and limit fire propagation. Furthermore, in accordance with Chapter 35 of the CFC, fire watch must be provided during hot work activities and continue at least 30 minutes beyond the conclusion of hot work activities. As part of the fire watch, the work are must be reviewed prior to authorizing hot work operations to ensure the hot work would be conducted in a fire-safe area, thereby further reducing wildfire risk during construction. The combination of site-specific fire safety

measures, timing controls, and regulatory compliance ensures that construction activities would not materially increase wildfire risk beyond baseline conditions. With implementation of these measures, construction impacts would be less than significant.

Operation

Project operation would involve 56 new single-family dwelling units on the project site. This could result in the introduction of new potential ignition sources in the form of flammable building materials, vegetation for landscaping, vehicles, and small machinery for building and landscape maintenance. Additionally, the proposed project would be constructed with materials consistent with CBC Chapter 7A and California Residential Code Section R337. Specifically, the proposed project would comply with requirements set forth for roof coverings, vents, residential sprinklers, ignition-resistant construction materials, decking, and exterior windows, skylights, and doors. Compliance with these requirements would reduce the likelihood that structures would ignite from embers, radiant heat, or direct flame contact during a wildfire, as these requirements are designed to interrupt common ignition pathways and limit fire spread. Additionally, the proposed project design would be subject to review by SBCFD to ensure the proposed project design adheres to SBCFD development standards for adequate ingress and egress, fire hydrant spacing and water flow to the site, installation of a stored water protection system on site, adequate fire sprinkler systems, and defensible space. The proposed project would include installation of a new water main on site and a domestic and fire storage and delivery system that would exceed the minimum fire flow requirements included in the CFC. The fire hydrant system installed on site would be in compliance with SBCFD development standards.

In accordance with General Plan/Costal Land Use Plan Policy SE 7.4 and Municipal Code Section 17.32.060, a landscape plan which meets the requirements of a Fire Fuel Modification Plan was prepared for the proposed project. The plan was developed to meet SBCFD development standards and demonstrates compliance with defensible space requirements outlined in Chapter 49 of the CFC and Section 51182 of the California Government Code.

The plan prohibits the use of highly flammable plant species identified in SBCFD development standards and instead incorporates irrigated, fire-resistant landscaping around dwelling units and common areas. Plantings would be strategically placed to create fuel breaks, reduce flame lengths, and minimize the potential for fire to spread toward nearby homes.

Hardscaping with limited combustible materials in or near structures and the use of non-combustible fencing would be utilized on the project site to minimize the ability of a fire to spread on-site. Hardscaping would include interior block walls between individual lots and a perimeter block wall surrounding the development which would serve to contain potential on-site fires. In addition, the proposed project would include a 50-foot-wide landscape buffer along Cathedral Oaks Road which would ensure flammable vegetation is adequately set back from Cathedral Oaks Road such that potential ignition sources near the roadway are limited. Collectively, these hardscape and landscape features would minimize the likelihood of wildfire ignition or spread within the project site.

Project roadways would meet SBCFD development standards, which would ensure that fire response vehicles would be able to readily access the site in the event of a fire, reducing the potential for the fire to spread uncontrollably. Additionally, there are no gates on the project site, ensuring access to the project site would not be blocked by any closed gates in the event of an emergency.

The project site is mostly surrounded by a golf course and urban development, both of which provide effective defensible space and would not readily contribute to the spread of wildfire. Specifically, the existing golf course is maintained as a greenbelt that is regularly irrigated and managed to remain

non-combustible, thereby reducing potential fire exposure along much of the project boundary. However, there is a small portion of the site along the southwestern border that includes a riparian area which has combustible vegetation. To minimize potential wildfire risk in this area, the proposed project would incorporate a maximum 100-foot buffer zone[4] between any development associated with the proposed project and the riparian zone onsite. This buffer area would include a walking path, turf areas, trees selected for low flammability, and irrigated landscaping intended to not support the spread of wildfire. The proposed project would also construct a perimeter road which would further separate dwelling units from the riparian area along the southwest border of the site. This buffer area would provide an additional fuel break and access route for emergency responders which would reduce the risk of the spread of wildfire onto the project site.

Overall, the design of the proposed project would minimize the amount of ignition sources for a fire and would include features to assist with the containment of wildfire in compliance with existing regulations including those in the CFC, CBC, California Residential Code, the City of Goleta General Plan/Coastal Land Use Plan, Municipal Code, and SBCFD Development standards. The proposed project's impact related to the uncontrolled spread of a wildfire would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impact W-3 **THE PROPOSED PROJECT WOULD REQUIRE THE INSTALLATION OF ROADS AND UNDERGROUND UTILITY CONNECTIONS INCLUDING THOSE FOR WATER AND ELECTRICITY. THE UNDERGROUNDING OF UTILITY CONNECTIONS IN COMPLIANCE WITH EXISTING CBC, CFC, AND SBCFD REGULATIONS WOULD ENSURE THAT INSTALLATION OF THIS INFRASTRUCTURE WOULD NOT EXACERBATE FIRE RISK OR RESULT IN TEMPORARY OR ONGOING IMPACTS TO THE ENVIRONMENT. THIS IMPACT WOULD BE CLASS III, *LESS THAN SIGNIFICANT*.**

As described in Section 4.13, *Utilities and Service Systems*, the proposed project would be served by extensions of existing power lines, water sources, and other utility services. Specifically, the proposed project would require the extension of underground power lines beneath Cathedral Oaks Road and installation of new underground water lines connecting to the existing water main at Cathedral Oaks Road and Royal Linda Drive, and at Cathedral Oaks Road and King Daniel Lane. Additionally, the proposed project would involve construction of internal roadways within the project site to provide site access.

These new roadways would enhance emergency response capability by improving ingress and egress for both residents and emergency vehicles. The new on-site water lines would serve the proposed residences and supply several new fire hydrants throughout the development, thereby improving firefighting capacity. Undergrounding the power lines would further reduce wildfire ignition potential associated with overhead utility infrastructure.

[4] As discussed in Section 2.3.8 of Chapter 2, *Project Description*, the buffer area may be no less than 25 feet under certain circumstances.

Furthermore, as described under Impact W-2, the proposed project would maintain a maximum 100-foot buffer zone near the riparian area on the southwestern border of the project site to further reduce spread of wildfire to adjacent land. This buffer area and implementation of the project landscape plan would reduce wildfire risk by reducing fuel load on site. The proposed project would also comply with the defensible space requirement set forth in the SBCFD development standards, Chapter 49 of the CFC, and Section 51182 of the Government Code by maintaining irrigated fire resistive landscaping around the dwelling units and common areas on the project site which would reduce the risk of wildfire on site.

Installation of the proposed infrastructure would occur entirely within the project site, and the environmental effects of such improvements are evaluated throughout this EIR. None of the potential infrastructure improvements would exacerbate fire risk or result in additional temporary or ongoing impacts to the environment beyond those already identified and disclosed throughout this EIR. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 4:	If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact W-4 THE PROPOSED PROJECT IS LOCATED ON LANDS CLASSIFIED AS A VERY HIGH FHSZ IN AN LRA AND IS NEAR LANDS CLASSIFIED AS A VERY HIGH FHSZ IN AN SRA. THE PROJECT WOULD EXPOSE PEOPLE OR STRUCTURES TO SIGNIFICANT RISKS, INCLUDING DOWNSLOPES OR LANDSLIDES, AS A RESULT OF POST-FIRE SLOPE INSTABILITY. IMPLEMENTATION OF MITIGATION MEASURE GEO-1 WOULD BE REQUIRED, AND THIS IMPACT WOULD BE CLASS II, *LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED*.

Construction

The proposed project would involve over one acre of site disturbance during grading and the construction of residences, sidewalks, roadways, patios, landscaping, and associated facilities. Construction would involve grading of approximately 27,500 cubic yards of cut and 23,500 cubic yards of fill. This grading activity would involve vegetation removal and expose soil to erosion. Project site disturbance would eliminate existing vegetative cover, including grasses, shrubs, and ornamental landscaping, which currently stabilize soil and reduce surface runoff. The removal of vegetation and modification of site topography would increase the susceptibility of exposed soils to erosion from wind and stormwater, particularly during construction activities. Although wildfires can exacerbate erosion and slope instability, the project site does not contain steep terrain, ravines, or other unique topographic features that would intensify post-fire runoff or landslide risk.

As discussed in Section 4.8, *Hydrology and Water Quality*, the proposed project would comply with the Construction Stormwater General Permit and the City Municipal Code, as well as implementation of the required Stormwater Pollution Prevention Plan and construction best management practices to minimize erosion and sediment discharge on site. By minimizing on-site erosion and controlling sediment-laden runoff, these standards help prevent downstream sedimentation that could reduce channel capacity and increase flood risk. Proper stormwater management also reduces the likelihood of concentrated flows that could destabilize slopes or contribute to shallow landslides, particularly in

areas with steep terrain or erodible soils. The Stormwater Pollution Prevention Plan and best management practices are designed to maintain pre-construction hydrologic conditions to the extent feasible, thereby reducing the potential for off-site impacts such as flooding or slope failure. With implementation of these standards, construction activities would not substantially alter the drainage pattern of the site or result in substantial erosion.

Additionally, as described in Impact W-2, the proposed project would implement measures such as the use of spark arresters on equipment and the suspension of hot work during periods of elevated fire risk. These measures directly address the potential for fire ignition from construction activities

Through implementation of site-specific erosion control measures and fire prevention protocols, the proposed project would have low potential to expose people or structures to significant risks associated with runoff, post-fire slope instability, or drainage changes. Construction impacts would be less than significant.

Operation

During operation, there would be stormwater runoff from impervious surfaces on site, as occurs under existing conditions. However, stormwater infrastructure installed as part of the proposed project would be implemented to maintain pre-project runoff rates and minimize erosion. While operational erosion impacts would be minimized on site, as discussed in Section 4.5, *Geology and Soils*, the northern portion of the project site is mapped within an area of high landslide potential. This area is underlain by the Rincon Formation, which is known for its susceptibility to slope instability. The site includes sloping terrain, particularly in the northern section, where landslide risk is greatest. In the event of a wildfire, fire can damage vegetation roots and burn vegetation. Vegetation itself acts as a barrier to rockfall or soil movement, and the roots of vegetation help maintain soil stability. The damage or removal of vegetation would result in the removal of natural barriers to deflect or stop landslide movement and would decrease the relative stability of soils underlying the project site, which would increase the risk of landslide potential on the project site. Accordingly, wildfire on the project site could exacerbate the risk of slope instability or risk of landslide.

Risk of landslide on the project site would be reduced through the implementation of Mitigation Measure GEO-1, which would require the project design to incorporate recommendations made in the *Preliminary Geotechnical Investigation* (Appendix E). These include the recommendation that existing fill and soft material be excavated to firm native soil, that cut pads be used for compaction control, and that piers be used for stability of the residences on site. These recommendations are based on site-specific geotechnical conditions and are intended to directly address the potential for soil instability and slope movement. Excavation to firm native soil would eliminate the presence of unconsolidated or expansive materials that could shift under load or during seismic or post-fire conditions. Cut pads would ensure uniform compaction and slope integrity, reducing the likelihood of differential settlement or surface sloughing. The use of piers would provide foundational support, anchoring buildings into stable subsurface layers and reducing the risk of structural movement or collapse in the event of soil instability.

Together, these recommendations are designed not only to reduce the risk of landslide but also to meet established engineering safety factors for slope stability and structural integrity. The *Preliminary Geotechnical Investigation* (Appendix E) concluded that, with implementation of these recommendations, the project site would be suitable for the proposed development and would not pose a significant geologic hazard. Therefore, adherence to Mitigation Measure GEO-1 would reduce the potential for landslide or post-fire slope instability to a level where no substantial risk to people or structures would occur. Impacts would be less than significant with mitigation.

Mitigation Measures

Mitigation Measure GEO-1, described in Section 4.5, *Geology and Soils*, is required for the proposed project's operation-related impacts.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 would reduce the risk of landslide on the project site by ensuring the proposed project incorporates recommendations included in the *Preliminary Geotechnical Investigation* (Appendix E). This would reduce impacts associated with post-fire instability and landslide risk as a result of wildfire to less than significant.

4.14.4 Cumulative Impacts

The geographic scope for cumulative wildfire impacts is all of the City of Goleta. This geographic scope for cumulative analysis includes buildout of the City of Goleta General Plan/Costal Land Use Plan, and buildout of areas adjacent to the project site, including development of surrounding areas in specific development proposals for nearby properties as described in Table 3-1 of Chapter 3, *Related Projects*. As described in Section 4.8, *Hydrology and Water* Quality, the proposed project would result in no impact related to flooding; therefore, the proposed project has no potential to contribute to cumulative impacts related to risks of downslope or downstream flooding. As such, cumulative impacts related to risks of downslope or downstream flooding are not discussed herein. The general approach to cumulative impact analysis used in this EIR is discussed in Chapter 3, *Related Projects*.

As shown in Table 3-1 of Chapter 3, *Related Projects*, the Annual Pavement Rehabilitation Project and Pavement Management Program is currently under construction and the Glen Annie Golf Course Residential Development is located adjacent to the project site and would involve the construction of up to 1,000 residential units. These projects may require closure of Cathedral Oaks Road and other roads near the project site. Road closures for these project in combination with changes as a result of other future development projects in the vicinity that may require road closures, new design features, or rerouting of traffic could result in delays in emergency evacuation. Therefore, cumulative impacts related to emergency evacuation would be potentially significant. The proposed project would require temporary lane closures along Cathedral Oaks Road during frontage improvements. These closures could result in short-term disruptions to traffic flow and emergency access in the immediate area. As a Condition of Approval, the project applicant's construction contractor would be required to implement a Construction Traffic Management Plan. This plan would include coordination with the City and emergency service providers to avoid overlapping closures and maintain Cathedral Oaks Road for emergency evacuation. With implementation of this plan, the proposed project would not result in a considerable contribution to potential cumulative impacts related to emergency evacuation.

The City of Goleta is within an LRA, but is surrounded by land classified as an SRA. The majority of land north of the project site is classified as a very high FHSZ. There are also areas of moderate FHSZs in SRAs along the western edge of the city and just southeast of Goleta (CALFIRE 2024b). Within the city, there are areas of moderate, high, and very high FHSZs along the northern border of the city within the LRA. There is also an area of moderate FHSZ along the southwestern portion of the city within an LRA (CAL FIRE 2025). Cumulative wildfire-related impacts could be significant if cumulative development would occur in rural or high fire hazard areas that could exacerbate risks due to location on steep slopes, in high-wind areas, or areas of historical wildfire burn areas. Cumulative development and infrastructure would be subject to Statewide standards for fire safety in the California Fire Code and local regulations. However, existing codes and regulations cannot fully prevent wildfires from

damaging structures or populations, and cumulative impacts related to exposing occupants to pollutant concentrations for wildfire, the uncontrolled spread of a fire, and fire risk associated with the installation of infrastructure would be potentially significant.

The proposed project would be located within a very high FHSZ. The project itself is designed to increase fire breaks and access for emergency response crews and adheres to defensible space requirements. While the proposed project would require the extension of power, water, and other utilities to the site, no overhead power lines would be required, and all infrastructure would be designed and installed compliant with local and State regulations, including the CBC, CFC, and SBCFD development requirements. These standards require fire-resistant construction, defensible space, and adequate emergency access, all of which would reduce structure ignition and fire spread. The project's underground utilities and enhanced emergency access further reduce ignition risk and improve response capability. Because the proposed project would comply with existing regulations intended to reduce the risk and spread of wildfire, the project would not result in a considerable contribution to cumulative wildfire impacts related to exposing occupants to pollutant concentrations for wildfire, the uncontrolled spread of a fire, and fire risk associated with the installation of infrastructure.

Wildfire within Goleta could expose additional people or structures to risks including landslides as a result of post-fire instability. The magnitude of such hazards depends on site-specific conditions, such as slope, soil type, and vegetation cover. Cumulative projects within the region are subject to mandatory compliance with the CBC, which requires geotechnical investigations and site-specific engineering solutions to address slope stability. Because each cumulative project must evaluate and mitigate its own geologic hazards through site-specific design and regulatory compliance, the risk of post-fire landslides is localized and not expected to compound across projects. Accordingly, cumulative impacts related to risks associated with post-fire slope instability would be less than significant.

5 Other CEQA Concerns

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

According to the California Department of Finance (2025), the current population of Goleta is approximately 32,747 people. The proposed project would facilitate construction of 56 single-family residential units. Based on the City of Goleta's average household size of 2.59 persons per household (California Department of Finance 2025), the proposed project would result in an estimated population increase of approximately 145 residents, bringing the total city population to approximately 32,892 residents. As described in Section 4.0.3.4, *Population and Housing*, of Chapter 4, *Environmental Impact Analysis*, this increase is within the growth projections developed by the Santa Barbara County Association of Governments, which estimate that Goleta's population will reach 34,700 by 2050 (Santa Barbara County Association of Governments 2019). The proposed project would not exceed regional growth projections or induce growth beyond what is planned in the City's General Plan or regional planning documents. Therefore, the proposed project would not induce substantial population growth that could lead to substantial adverse environmental effects.

5.1.2 Economic Growth

The proposed project would generate temporary employment opportunities during construction. Based on the size of the project and scale of construction, construction workers would be expected to be drawn from the existing regional workforce. As such, construction of the project would not be growth-inducing from a temporary employment standpoint.

The proposed project would not include commercial, industrial, or other employment-generating uses and would not result in long-term job creation. Therefore, the proposed project would not induce economic expansion to the extent that substantial environmental impacts would occur.

5.1.3 Removal of Obstacles to Growth

The proposed project would develop residential uses within the City of Goleta on a site surrounded by residential, recreational, and open space uses. Access to the project site would be provided from existing roadways such as Cathedral Oaks Road, Storke Road, and United States Route 101. Aside from the internal on-site roadways which provide circulation within the project site, no new roadways would be required for the proposed project.

As described in Section 4.13, *Utilities and Service Systems*, the project would utilize existing water, wastewater, stormwater, electric, and telecommunications infrastructure. Utility extensions would be limited to connections within the project site and to existing service lines beneath Cathedral Oaks Road. 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 have new potential for development 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 obstacles to growth in the project vicinity.

5.2 Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(b) requires that an EIR identify significant impacts that a project would cause which cannot be reduced to less than significant with the application of mitigation measures. As discussed throughout Chapter 4, *Environmental Impact Analysis*, most potentially significant impacts of the proposed project would be reduced to less than significant through implementation of mitigation measures. However, implementation of the proposed project would result in one significant and unavoidable impact.

As discussed in Section 4.11, *Transportation and Circulation*, the proposed project would generate 21.24 vehicle miles traveled (VMT) per resident, which exceeds the City of Goleta's threshold of 16.79 VMT per resident. Given that vehicle miles are distributed regionally and based on the project site's proximity to unincorporated Santa Barbara County, the County of Santa Barbara VMT tool was also used to estimate project VMT in relation to County thresholds. Using the County's VMT calculator, the project is estimated to generate 15.9 VMT per resident, which exceeds the County threshold of 14.9 VMT per resident. Mitigation Measure TRA-1, requiring a Vehicle Miles Traveled Reduction Plan, could potentially reduce VMT to 12.75 VMT per resident for the County, which would be below the County's threshold of 14.9 VMT per resident. However, with Mitigation Measure TRA-1, VMT could potentially be reduced to 17.03 VMT per resident for the City of Goleta and the project would still exceed the City VMT threshold of 16.79 VMT per resident. Furthermore, the implementation of some VMT reduction programs (i.e., improve design of development, extend transit network coverage or hours) could result in additional ground-disturbing activities which would result in additional environmental impacts associated with increased ground disturbance. Therefore, the impact would remain significant and unavoidable.

No other significant unavoidable impacts have been identified. All other potentially significant impacts, including those related to air quality, noise, biological resources, water supply, and utilities, would be reduced to less than significant levels through mitigation or compliance with existing regulations.

5.3 Irreversible Environmental Effects

CEQA Guidelines Section 15126.2(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.

Development of the proposed project would result in a long-term commitment of the project site to residential use. The site is currently a large fallow field with three small buildings including a single-family residence and historically used for agriculture. It would be permanently altered through the removal of existing on-site structures and construction of 56 single-family homes, internal roadways, stormwater infrastructure, and utility connections. This change in land use would be irreversible and would commit the site to urban development, precluding future agricultural or open space uses.

Construction of the proposed project would require the consumption of non-renewable resources, including fossil fuels (e.g., gasoline and diesel), building materials (e.g., concrete, steel, and lumber), and energy. These resources would be used for site preparation, grading, infrastructure installation, and construction. Although the project incorporates sustainable design features, such as all-electric buildings, solar readiness, efficient HVAC systems, and water-conserving fixtures, operation of the project would still require ongoing consumption of electricity, potable water, and other resources. Utilization and consumption of these resources would occur with any development in Goleta and are not unique to the proposed project.

As discussed in Section 4.13, *Utilities and Service Systems*, the proposed project would result in a permanent increase in demand for water supply, wastewater treatment services, and solid waste disposal services. These service demands represent a long-term commitment of public resources. However, the proposed project's water demand (approximately 15.1 acre-feet per year) is consistent with long-range planning forecasts (Goleta Water District 2021). Wastewater and solid waste impacts would also be less than significant because the project would not exceed the capacity of existing infrastructure or violate applicable reduction and diversion standards.

The proposed project would also result in a permanent increase in vehicle trips, contributing incrementally to regional air pollutant and greenhouse gas emissions. However, as discussed in Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*, these impacts would be less than significant.

No irreversible environmental damage due to environmental accidents (e.g., hazardous materials spills) is anticipated because the project does not involve industrial uses nor hazardous operations and would comply with applicable safety and construction standards.

Development accommodated by the proposed project would result in an irreversible commitment of land to residential use and long-term consumption of natural and non-renewable resources, including electricity, potable water, and building materials. As described in Section 4.13, *Utilities and Service Systems*, these impacts would be less than significant.

5.4 Mandatory Findings

Section 15065 of the *CEQA Guidelines* requires that 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 on plant and animal species populations, habitats, communities, and migratory patterns. As discussed therein, with implementation of mitigation, the proposed project would not result in a significant impact to special-status species, riparian habitat, aquatic resources, or wildlife movement. Consequently, the proposed project would not 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

Section 4.4, *Cultural Resources*, and Section 4.12, *Tribal Cultural Resources*, describe the proposed project's potential effects on important historical and prehistorical cultural and tribal cultural resources on the project site. As discussed in those sections, with implementation of mitigation, the proposed project would not result in a significant impact to historical resources, archaeological resources, human remains, or tribal cultural resources. Consequently, the proposed project would not eliminate important examples of the major periods of California history or prehistory.

Potential adverse environmental effects to human beings are discussed in Section 4.2, *Air Quality*, Section 4.5, *Geology and Soils*, Section 4.7, *Hazards and Hazardous Materials*, Section 4.8, *Hydrology and Water Quality*, Section 4.9, *Land Use and Planning*, Section 4.10, *Noise*, and Section 4.14, *Wildfire*. As discussed in those sections, with implementation of mitigation, the proposed project would not result in a significant impact involving air quality, geologic hazards, hazardous materials, emergency response, division of communities, noise, or wildlife. Therefore, the proposed project would not result in environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly.

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 *California Environmental Quality Act (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:

1. Develop up to 56 residential units on underutilized land located within Goleta.
2. Provide residential development in Goleta to fulfill the housing stock envisioned in the City's adopted 2023-2031 Housing Element.
3. Provide housing opportunities for extremely low income, lower income, and moderate income-level persons to support the City in complying with its Regional Housing Needs Allocation requirements.
4. Improve accessibility and encourage active transportation for bicycles and pedestrians in Goleta.
5. Design residences to incorporate green building measures to encourage the use of energy and water efficient technology.

In addition to meeting the project objectives, alternatives were considered that would avoid or substantially lessen the following significant and unavoidable adverse impact identified for the project:

- Project generation of vehicle miles traveled (VMT) exceeding the City's VMT threshold.

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 the significant and unavoidable adverse impact 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 evaluated 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 that 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 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 if the proponent can reasonably acquire, control, or otherwise have access to an 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 are 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 those 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 plans and/or policies; and
- Inconsistency with adopted agency (i.e., non-City) plans and/or policies.

The following alternatives were considered but eliminated from further analysis by the City due to one or more of these factors.

6.2.1.1 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 (*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 (*CEQA Guidelines* Section 15126.6[f][2][B]).

No alternative properties to undertake the proposed project are analyzed in this EIR. The project involves construction of a single-family residential project on approximately 14.38 acres. Based on a review of properties for sale in October 2025, there are no other vacant properties of similar size for sale in the City that could support a development similar to the proposed project (LoopNet 2025, Realtor.com 2025). In addition, 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 a result of these considerations, alternative project site locations were considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

6.2.1.2 Reduced Scale

The proposed project would involve construction of a 56-unit single-family residential development. The City considered a reduced scale alternative that would involve construction of fewer residential units than the proposed project. However, a reduced scale alternative would not necessarily reduce the project's significant unavoidable VMT impact to less than significant. Because VMT is measured

on a per resident basis, reducing the number of residents by reducing the number of housing units does not necessarily directly reduce VMT because it would not change the distance to other destinations that the residents would be anticipated to visit in a day (such as commercial, office, or schools). In addition, based on the screening criteria in the 2020 City of Goleta VMT Threshold Study, a project that generates less than 110 daily trips can be presumed to have a less than significant VMT impact. The project's 56 residential would generate 477 average daily trips and would need to be reduced to less than 13 units to be presumed to have a less than significant impact on VMT. Pursuant to Sections 17.28.040 and 17.28.050 of the Municipal Code, the City requires residential projects proposing five or more units to include 20 percent of total units as income-restricted units, with in-lieu fees paid if the calculation of 20 percent of income-restricted units would result in a fraction. For a 13 unit development, this would mean 3 units would be required to be income-restricted or 2 units would be required to be income-restricted plus the payment of in-lieu fees. To be financially feasible for the project applicant, a development reduced to 13 units would likely not include additional income-restricted housing units beyond City requirements, and therefore would not include more income-restricted housing units than the proposed project. Accordingly, this alternative would not meet Project Objective 3 to the same extent as the proposed project. In addition, a reduction in housing units would not help the City fulfill the housing stock envisioned in the Housing Element to the same extent as the proposed project and would, therefore, not fully meet Project Objective 2. As a result of these considerations, a reduced scale project was considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

6.2.1.3 Alternative Use

The proposed project would involve construction of a single-family residential development. The City considered an alternative that would involve construction of a commercial/retail development instead of residential to reduce the proposed project's significant and unavoidable VMT impact. This alternative could be assumed to reduce the VMT to less than significant based on the screening criteria in the 2020 City of Goleta VMT Threshold Study. Specifically, 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. The development adjacent to the project site is primarily comprised of residential development and schools. The nearest commercial/retail areas to the project site are located approximately 0.6-mile south of the project site on the corner of Calle Real and Ellwood Station Road. Because this alternative locates commercial/retail development near existing residences but away from other commercial areas, it is expected to draw more visitors than a residential use. Nearby residents could access on-site retail instead of traveling farther into the City, which could reduce VMT for surrounding residential uses. However, the increase in customers visiting the new commercial/retail development would result in increased vehicle trips to the project site compared to the proposed project, which would subsequently result in increased air pollutant emissions, greenhouse gas (GHG) emissions, and traffic noise compared to the proposed project. In addition, while not considered a CEQA impact,[1] the increased trips would result increased vehicle congestion on Cathedral Oaks Road, which could conflict with City of Goleta General Plan/Coastal Land Use Plan Policy TE 4.1 which mandates level of service standards for roads in Goleta. Furthermore, this

[1] Level of service refers to a rating system used to determine projected traffic impacts of proposed developments relative to projected traffic congestion and intersection backups. Senate Bill 743, which was signed into law in 2013, directed the Governor's Office of Land Use and Climate Innovation (formerly the Office of Planning and Research) to develop revisions to the *CEQA Guidelines* to establish new criteria for determining the significance of transportation impacts and define alternative metrics instead of traffic level of service. In response, the Governor's Office of Land Use and Climate Innovation proposed the proposed new *CEQA Guidelines* Section 15064.3 which established VMT as the most appropriate measure of transportation impacts, which became effective in December 2018. Accordingly, level of service is not utilized for the purposes of CEQA analysis but is mentioned herein to describe potential policy inconsistency with the General Plan/Coastal Land Use Plan.

alternative would fail to meet the following project objectives, which are aimed at promoting residential development on-site to support the City's housing goals:

- Develop up to 56 residential units on underutilized land located within Goleta.
- Provide residential development in Goleta to fulfill the housing stock envisioned in the City's adopted 2023-2031 Housing Element.
- Provide housing opportunities for extremely low income, lower income, and moderate income-level persons to support the City in complying with its Regional Housing Needs Allocation requirements.

Given that this alternative would increase vehicle trips and associated air pollutant emissions, GHG emissions, and traffic noise compared to the proposed project; could result in additional conflicts with the General Plan/Coastal Land Use Plan; and would not meet several of the project objectives, a commercial/retail development on the project site was considered and rejected, consistent with *CEQA Guidelines* Section 15126.6(c).

6.2.2 Description of Alternatives Evaluated

This analysis considers the following two alternatives to the proposed project:

- Alternative 1: No Project Alternative (No Build)
- Alternative 2: No Project Alternative (By-Right Development)
- Alternative 3: Mixed-Use Alternative

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 (No Build)	Alternative 2: No Project Alternative (By Right Development)	Alternative 3: Mixed-Use Alternative
Use type	Single-Family Residential	Agriculture, Single-Family Residential	Agriculture, Single-Family Residential	Mixed-Use: Multi-Family Residential, Neighborhood Market, Workspace, Daycare
Development Footprint	14.38 net acres	3,893 square feet (existing)	14.38 net acres	14.38 net acres
Units	56 Single-Family Residences	No development would occur. The existing on-site residence and associated structures would remain.	1 Single-Family Residence (existing 2,015 square foot on-site residence which could be expanded to up to 4,900 square feet), 12 residential units for farmworker housing (each up to 1,500 square feet), up to 20,000 square feet of a greenhouse complex, on-site agricultural uses which could include row crops, orchards, or animal grazing	56 Multi-Family Residences; 1 Commercial (Neighborhood Market and Workspace), 1 Daycare totaling 12,000 square feet

SF = square feet

6.2.2.1 Alternative 1: No Project Alternative (No Build)

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 *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. Alternative 1 assumes that if the proposed project is not approved, the site would remain in its existing condition. The existing condition includes a 2,015-square-foot residence, 726-square-foot garage, and 1,152- square-foot barn, all of which are vacant and would remain vacant under this alternative. The project site had an avocado orchard until the mid-1990s, a remnant of which is evident on the northern third of the lot. The project site is currently used in part for the splitting and storage of woodchips and firewood, which would continue under Alternative 1. Alternative 1 would not result in any development on the project site.

6.2.2.2 Alternative 2: By-Right Development

In another version of a no project alternative, if the project is not approved, Alternative 2 assumes the site would be developed with land uses that are allowed by-right pursuant to the Goleta Municipal Code. In accordance with the AG-II zoning district, the re-establishment of the avocado orchard or the establishment of other agricultural operations could occur without requiring discretionary approvals. Other land uses allowed by right under the existing AG-II zoning are provided in Goleta Municipal Code Section 35-217.3, and include the following:

- All types of agriculture, including the commercial raising of animals
- Sale of agricultural products produced on the premises
- Greenhouses not exceeding a total of 20,000 square feet
- One single-family dwelling unit per legal lot
- One guest house or artist studio per legal lot
- Home occupations
- Animal hospitals
- Commercial boarding of animals and riding stables

For the purposes of this analysis, Alternative 2 would include the largest amount of structural development allowable on the project site by right, which would be a complex of greenhouses totaling 20,000 square feet in floor area (e.g., 10 greenhouses at 2,000 square feet each), and 12 units provided for farmworker housing. The greenhouses would be powered with solar panels, with backup generators on-site in the event of solar panel failure. The residence also could be enlarged, or the residence could be demolished and a new, larger residence could be constructed at a size of up to 4,900 square feet, as long as the new development complied with the 35-foot height limitation and minimum setback of 10 feet from Cathedral Oaks Road. Row crops, orchards, or animal grazing would also be allowed over most of the project site. Based on allowable uses and the above assumptions, Alternative 2 would include expansion of the existing single-family residence to 4,900 square feet, 12 residential units provided as farmworker housing assumed to each be up to 1,500 square feet, up to 20,000 square feet of a greenhouse complex, and agricultural uses such as row crop cultivation, orchards, or animal grazing on the undeveloped portions of the project site. The residence and farmworker housing would not use natural gas. The 20,000 square foot greenhouse complex would

result in approximately 40 additional employees, some of which would be housed in the proposed farmworker housing. In addition, Alternative 2 would not include the extension of the Class I trail parallel to Cathedral Oaks Road. Alternative 2's construction equipment staging and worker parking would occur entirely on-site. Based on Alternative 2's reduction in people on-site compared to the proposed project (3 residents and 40 employees compared to the proposed project's 145 residents), Alternative 2 would result in fewer daily vehicle trips to and from the project site compared to the proposed project. Utility infrastructure required for Alternative 2 would be installed underground.

6.2.2.3 Alternative 3: Mixed-Use Alternative

This alternative would include the development of 56 multifamily residential units (such as duplexes, triplexes, or other medium-density residential buildings) rather than single-family, as well as the addition of commercial and daycare space within the same development footprint as the project. The multifamily residences would allow for increasing the residential density on a portion of the site to accommodate the same number of proposed units as the proposed project as well as a neighborhood market, workspace, and daycare totaling approximately 12,000 square feet to serve the on-site residences. The neighborhood market would consist of a small grocery store designed to serve the local residential area. The workspace would provide flexible workspace for residents, including one coworking space and four private offices, that would be available for use by the project residents. These commercial facilities would result in approximately 24 employees. Alternative 3's development would be designed in compliance with a 35-foot height limitation, enforced within Table 17.07.030 of the City's Municipal Code for medium-density residential development. For the purposes of this analysis, it is assumed that the land cover amount would be similar to that of the project, with an increased scope of development activities within the same project footprint as the proposed project. Alternative 3's construction equipment staging and worker parking would occur entirely on-site. Utility infrastructure required for Alternative 3 would be installed underground. Alternative 3's construction equipment staging and worker parking would occur entirely on-site.

6.3 Alternatives Impact Analysis

This section describes the potential environmental effects of each of the alternatives described above in Section 6.2.2 in comparison to the proposed project. The specific environmental effects evaluated within each alternative section are the environmental effects evaluated within Section 4.1, *Aesthetics and Visual Resources*, through Section 4.14, *Wildfire,* of this EIR.

6.3.1 Alternative 1: No Project Alternative (No Build)

a. Aesthetics and Visual Resources

Under Alternative 1, the project site would remain in its existing condition and no alterations to existing views on the site would occur. Alternative 1 would have no impact on scenic vistas, which would be a reduced level of impact compared to the proposed project.

The project site is not visible from a scenic highway. Like the proposed project, Alternative 1 would have no impact on scenic resources within a State scenic highway.

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 reduced level of impact compared to the proposed project.

Alternative 1 would not result in new sources of light and glare, as no new development would occur and on-site structures would remain the same as existing conditions. 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 reduced level of impact compared to the proposed project.

Overall, based on the above, Alternative 1 would have no impact related to aesthetics and visual resources, which would be a reduced level of impact compared to the proposed project.

b. Air Quality

Alternative 1 would not result in new development on the project site, which would remain the same as existing conditions. Alternative 1 would not result in any new growth and therefore would not conflict with the growth projections utilized within the 2022 Ozone Plan. Alternative 1 would result in no impact involving conflict with an applicable air quality management plan, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not result in any demolition, construction, or additional on-site operational activities and therefore would not generate air pollutant emissions beyond existing conditions nor 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 impact related to criteria air pollutants would occur, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not result in any demolition, construction, or additional on-site operational activities and therefore would not generate air pollutant emissions beyond existing conditions that could expose sensitive receptors to substantial pollutant concentrations. No impact related to pollutant concentrations would occur, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not result in any demolition, construction, or additional on-site operational activities and therefore would not generate odors beyond existing conditions. No impact related to odors would occur, which would be a reduced level of impact compared to the proposed project.

Overall, based on the above, Alternative 1 would have no impact related to air quality, which would be a reduced level of impact compared to the proposed project.

c. Biological Resources

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 reduced level of impact compared to the proposed project.

Alternative 1 would maintain existing conditions at the project site and would not result in new development that would adversely impact riparian habitat or sensitive natural communities, either directly or indirectly. Alternative 1 would result in no impact to riparian habitat or sensitive natural communities, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not involve construction activities that could result in 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 reduced level of impact compared to the proposed project.

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 reduced level of impact compared to the proposed project.

Alternative 1 would not involve new development that would conflict with a local policy or ordinance that protects biological resources. Therefore, Alternative 1 would have no impact, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would be located on the same 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.

Overall, based on the above, Alternative 1 would have no impact related to biological resources, which would be a reduced level of impact compared to the proposed project.

d. Cultural Resources

Alternative 1 would be located on the same site as the proposed project, which does not contain structures eligible as historical resources. Alternative 1 would result in no impact on historical resources, which would be the same level of impact as the proposed project.

Alternative 1 would not include any new development or ground-disturbing activities on-site and therefore would have no potential to damage or disturb subsurface archaeological resources. Therefore, Alternative 1 would have no impact on archaeological resources, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not include any new development or ground-disturbing activities on-site and therefore would have no potential to damage or disturb human remains. Therefore, Alternative 1 would have no impact on human remains, which would be a reduced level of impact compared to the proposed project.

Overall, based on the above, Alternative 1 would have no impact to cultural resources, which would be a reduced level of impact compared to the proposed project.

e. Geology and Soils

Alternative 1 would be located on the same site as the proposed project. There is no Alquist-Priolo Fault Zone located on the project site. Therefore, Alternative 1 would have no impact involving fault rupture, which would be the same level of impact as the proposed project.

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; however, Alternative 1 would not include new development on the 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 reduced level of impact compared to the proposed project.

Alternative 1 would be subject to the same negligible liquefaction, lateral spreading, subsidence, and collapse risks as the proposed project; however, Alternative 1 would not include new development on the site that could increase the risk of loss, injury, or death due to these geologic hazards compared to existing conditions. Therefore, Alternative 1 would have no impact involving liquefaction, lateral

spreading, subsidence, and collapse, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would be subject to the same high landslide risk as the proposed project; Alternative 1 would not include new development on the project site that could increase the risk of loss, injury, or death due to landslides compared to existing conditions. Therefore, Alternative 1 would have no impact involving landslides, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not involve any ground-disturbing 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 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 reduced level of impact compared to the proposed project.

Alternative 1 would be subject to the same high to critical expansion potential of soils underlying the project site as the proposed project; however, Alternative 1 would not include new development on the project site that could increase risks to life or property due to expansive soils compared to existing conditions. Therefore, Alternative 1 would have no impact involving expansive soils, which would be a reduced level of impact compared to the proposed project.

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.

Alternative 1 would not include new development on the project site that could increase the potential to damage or disturb unanticipated paleontological resources. Therefore, Alternative 1 would have no impact on paleontological resources, which would be a reduced level of impact compared to the proposed project.

Overall, based on the above, Alternative 1 would have no impact related to geology and soils, which would be a reduced level of impact compared to the proposed project.

f. Greenhouse Gas Emissions

Alternative 1 would maintain existing conditions on the project site. Consequently, Alternative 1 would not generate GHG emissions beyond existing conditions and would not result in an increase in GHG emissions. Therefore, Alternative 1 would not have a significant impact on the environment regarding the generation of GHG emissions, and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No impact related to greenhouse gas emissions would occur, which would be a reduced level of impact compared to the proposed project.

g. Hazards and Hazardous Materials

Alternative 1 would not involve new development on the project site or involve the routine transport, use, or disposal of hazardous materials beyond existing conditions (i.e., the current minimal use of fuels occurring on-site for splitting and storage of woodchips and firewood). Alternative 1 would result in no impact related to the transport, use, or disposal of hazardous materials, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not result in the demolition of existing structures on the project site and therefore would not risk the release of asbestos-containing materials (ACM) or lead-based paints (LBP) which may be present in on-site structures. Alternative 1 would result in no impact involving the accidental release of hazardous materials, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would be located the same distance from nearby schools as the proposed project; however, Alternative 1 would not involve additional routine transport, use, or disposal of hazardous materials beyond existing conditions and therefore would not result in any increased risks of hazardous material use within 0.25-mile of a school. Alternative 1 would have no impact, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would be located on the same site as the proposed project, which is not located on a site listed pursuant to Government Code Section 65962.5. No impact would occur related to listed hazardous materials sites, which would be the same level of impact as the proposed project.

Alternative 1 would be located on the same site as the proposed project, which is not within the noise or safety contours of the Santa Barbara Airport. No impact related to excessive noise or safety hazards due to proximity to an airport would occur, which would be the same level of impact as the proposed project.

Alternative 1 would not result in any development and therefore would not require any closures of Cathedral Oaks Road for construction-related activities. Alternative 1 would not result in any increased vehicle trips to the project site beyond existing conditions. Therefore, Alternative 1 would have no impact related to interference with an adopted emergency response plan or emergency evacuation plan, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not include new development and would maintain existing conditions on-site, which involves the storage of firewood. Therefore, while Alternative 1 would not result in any development on the project site, under existing conditions Alternative 1 would pose fire risk due to the storage of firewood. Compared to the proposed project, Alternative 1 would consistently keep materials on-site with a higher risk of flammability compared to the proposed project. However, Alternative 1 would not involve construction activities with the potential to result in wildfire ignition or increase impacts related to wildfire compared to existing conditions. Alternative 1 would have no impact related to wildfire, and would be reduced when compared to the proposed project.

Overall, based on the above, Alternative 1 would have a no impact involving hazards and hazardous materials, which would be a reduce level of impact when compared to the proposed project.

h. Hydrology and 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 related to water quality degradation, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not include any new development on-site and therefore would not require additional water use, including groundwater, beyond existing conditions. In addition, Alternative 1 would not include the introduction of impervious surfaces on-site. Therefore, Alternative 1 would have no impact involving the substantial decrease of groundwater supplies or interference with groundwater recharge, which would be a reduced level of impact compared to the proposed project.

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 involving alteration of drainage patterns that result in substantial erosion or siltation, surface runoff, or polluted runoff, which would be a reduced level of impact compared to the proposed project.

As with the proposed project, Alternative 1 would be located outside of a flood hazard zone, tsunami inundation area, and seiche zone. No impact related to impeded or redirected flood flows would occur, which would be the same level of impact as the proposed project.

Alternative 1 would not result in any development and therefore would not result in water quality impacts, water consumption, or impacts to groundwater supplies beyond existing conditions. Therefore, Alternative 1 would not conflict with the *Water Quality Control Plan for the Central Coast Basin* (*Basin Plan*) or the *Groundwater Management Plan Goleta Groundwater Basin* (*Groundwater Management Plan)* and no impact would occur, which would be a reduced level of impact compared to the proposed project.

Based on the above, Alternative 1 would have no impact related to hydrology and water quality, which would be a reduced level of impact compared to the proposed project.

i. Land Use and Planning

Alternative 1 would not include new construction that could physically divide an established community and would result in no impact, which would be a reduced level of impact compared to the proposed project.

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/Coastal Land Use Plan Policies CE 1.9 and CE 2.3 because under Alternative 1, no development would occur within or proximate to Environmentally Sensitive Habitat Areas (ESHA) or within the Streamside Protection Area of El Encanto Creek. Alternative 1 would not conflict with the Goleta General Plan/Coastal Land Use 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 reduced level of impact compared to the proposed project. However, Alternative 1 would not assist in fulfilling the City's Regional Housing Needs Allocation requirements identified within the City's 2023-2031 Housing Element as Alternative 1 would not include new residential development. Nevertheless, Alternative 1 would have no impact involving land use and planning, which would be a reduced level of impact compared to the proposed project.

j. Noise

Alternative 1 would not generate construction noise which could exceed City of Goleta standards. Under Alternative 1, the site would remain under existing conditions, and no additional operational noise would occur. Alternative 1 would have no impacts related to noise, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not involve construction activities that would generate groundborne vibration. No impact would occur, which would be a reduced level of impact compared to the proposed project.

As with the proposed project, Alternative 1 would be located outside of the noise contours of the Santa Barbara Airport. As with the proposed project, Alternative 1 would have no impact related to excessive airport noise.

Based on the above, Alternative 1 would have no impact related to noise and vibration, which would be a reduced level of impact compared to the proposed project.

k. Transportation and Circulation

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. No impact would occur, which would be a reduced level of impact compared to the proposed project. However, Alternative 1 would not include the extension of the Class I trail parallel to Cathedral Oaks Road and therefore, unlike the proposed project, would not support the City's policies for alternate modes of transportation.

Alternative 1 would maintain existing conditions on-site and would not increase vehicle trips to and from the project site or VMT beyond existing conditions. Alternative 1 would result in no impact related to VMT, which would be a reduced level of impact compared to the proposed project.

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 reduced level of impact compared to the proposed project.

Alternative 1 would not result in new development, and consequently, would not require construction vehicles or temporary closure of lanes on Cathedral Oaks Road during the construction phase that could affect emergency access. Alternative 1 would result in no impact involving inadequate emergency access, which would be a reduced level of impact compared to the proposed project.

Based on the above, Alternative 1 would result in no impacts related to transportation and circulation, which would be a reduced level of impact compared to the proposed project.

l. Tribal Cultural Resources

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 site. In addition, Alternative 1 would not include ground-disturbing activities on-site that could potentially damage or disturb unanticipated tribal cultural resources. Alternative 1 would not potentially damage or disturb unknown tribal cultural resources; therefore, Alternative 1 would not cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code Section 21074. Therefore, Alternative 1 would have no impact on tribal cultural resources, which would be a reduced level of impact compared to the proposed project.

m. Utilities and Service Systems

Alternative 1 would not include new development and would maintain existing conditions on-site. Therefore, Alternative 1 would not result in new demand for water, wastewater, stormwater, electric, natural gas, or telecommunications facilities. Because no new or expanded utility infrastructure would be required, Alternative 1 would not result in the construction of new or expanded utility systems, and would therefore not cause significant environmental impacts related to such construction. No impact would occur, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not increase water demand or wastewater generation compared to existing conditions. As such, it would not exceed the capacity of existing water or wastewater treatment providers or infrastructure. No upgrades to water or wastewater systems would be necessary, and no impacts to water supply or wastewater treatment would occur. This would be a reduced level of impact compared to the proposed project.

Alternative 1 would not increase solid waste generation on-site compared to existing conditions. Consequently, Alternative 1 would not exceed the capacity of local landfills or conflict with applicable solid waste regulations. No impact would occur, which would be a reduced level of impact compared to the proposed project.

Therefore, Alternative 1 would have no impact on utilities and service systems, which would represent a reduced level of impact compared to the proposed project.

n. Wildfire

Alternative 1 would not include new development and would maintain existing conditions on-site, which involves the storage of firewood. Because no new structures or infrastructure would be introduced, Alternative 1 would not impair an adopted emergency response plan or emergency evacuation plan. No impact would occur, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not involve new construction or grading that could exacerbate wildfire risks due to slope, prevailing winds, or other site-specific conditions. However, the continued storage of firewood on-site would maintain the presence of flammable materials, which could contribute to the uncontrolled spread of wildfire or increase pollutant concentrations in the event of a fire. Nonetheless, Alternative 1 would not involve construction activities with the potential to result in wildfire ignition. No impact would occur, which would be a reduced level of impact when compared to the proposed project.

Alternative 1 would not require the installation or maintenance of infrastructure such as roads, fuel breaks, emergency water sources, or utilities. Because no new development would occur, there would be no temporary or ongoing environmental impacts associated with fire-related infrastructure. No impact would occur, which would be a reduced level of impact compared to the proposed project.

Alternative 1 would not introduce new structures or grading that could alter site drainage or slope stability. As such, it would not expose people or structures to significant risks related to post-fire flooding, landslides, or other geologic hazards. No impact would occur, which would be a reduced level of impact compared to the proposed project.

Overall, Alternative 1 would have no impact involving wildfire, which would represent a reduced impact compared to the proposed project.

6.3.2 Alternative 2: By-Right Development

a. Aesthetics and Visual Resources

Under Alternative 2, a complex of greenhouses totaling 20,000 square feet could be developed, and the existing residence could be enlarged or replaced with a larger residence. In addition, Alternative 2 would include 12 farmworker housing units and agricultural uses (e.g., row crop cultivation, orchards, animal grazing) on the remaining portions of the project site. Although Alternative 2 would introduce new structures, it would include fewer structures than the proposed project, and the

proposed agricultural uses (e.g., row crop cultivation, orchards, animal grazing) on undeveloped portions of the project site would not require additional structures that could impede views of scenic vistas. Accordingly, Alternative 2 would have less potential to impact scenic vistas compared to the proposed project. The greenhouse complex, residence, and farmworker housing would be designed in compliance with the 35-foot height limitation enforced within Table 17.12.030 of the City's Municipal Code, which is 10 feet higher than the 25-foot height limitation the proposed project is subject to. Although Alternative 2 would be taller than the proposed project, because fewer structures would be included, this alternative would result in less overall visual obstruction or blockage of views compared to the proposed project. Overall, Alternative 2's impacts related to scenic vistas would be reduced compared to the proposed project but would remain less than significant.

The project site is not visible from a scenic highway. Like the proposed project, Alternative 2 would have no impact on scenic resources within a State scenic highway.

Although the proposed project would be visually consistent with the RS-7 zone utilized for consistency evaluation pursuant to the Builder's Remedy, the RS-7 zone is not the site's existing zoning designation. Rather, it was used solely for the purpose of evaluating consistency of the proposed project pursuant to the Builder's Remedy, which allows certain projects to proceed despite zoning inconsistencies. In contrast, Alternative 2 would be consistent with the site's existing AG-II zoning designation, which permits low-density agricultural and rural residential uses. As such, Alternative 2 would result in development that is visually compatible with the type, scale, and character of development allowed under the AG-II zone. In addition, Alternative 2 would not require the use of waivers to meet applicable development standards. Therefore, Alternative 2 would have a reduced impact related to conflicts with applicable zoning governing scenic quality but impacts would remain less than significant.

As with the proposed project, Alternative 2 would include construction of new development on-site and therefore would introduce new sources of light. As with the proposed project, construction of Alternative 2 would not occur during evening or nighttime hours in accordance with Section 17.39.070 of the City's Zoning Code and would not require nighttime lighting. Given Alternative 2's reduced number of structures compared to the proposed project, it would require less operational lighting than the proposed project. Operational lighting installed as part of Alternative 2 would be designed in compliance with City of Goleta General Plan/Coastal Land Use Plan Policy VH 4.12 requirement for dark sky compliant lighting fixtures for exterior lighting. Alternative 2 would introduce similar sources of potential glare compared to the proposed project in the form of glass surfaces at the greenhouse complex and on windows of residences; however, glass surfaces in a greenhouse are typically anti-reflective in order to effectively manage sunlight exposure for plants within a greenhouse. In addition, on-site vegetation and structures would screen glare caused from the windows of residences. Overall, Alternative 2's impacts related to light and glare would be reduced compared to the proposed project but would remain less than significant.

Based on the above, Alternative 2's impacts related to scenic vistas, conflicts with applicable zoning governing scenic quality, and light and glare. would be reduced compared to the proposed project due to Alternative 2's reduced development footprint. Like the proposed project, Alternative 2 would result in no impacts related to a State scenic highway and impacts on scenic vistas, conflicts with applicable zoning governing scenic quality, and light and glare would be less than significant.

b. Air Quality

Based on the City's average 2.59 persons per household (California Department of Finance [DOF] 2025), Alternative 2 would result in direct population growth of three people from the renovations or construction of an on-site residence. The City of Goleta General Plan/Coastal Land Use Plan Final EIR utilizes a growth rate of one job per 500 square feet of commercial floor area to estimate growth from employment (City of Goleta 2006a). Accordingly, the 20,000 square foot greenhouse complex could result in approximately 40 additional employees to Goleta. In a conservative scenario where all projected employees and their families were to relocate to Goleta, based on the City's average 2.59 persons per household (DOF 2025), there would be an indirect population growth of 104 residents from the greenhouse complex. In total, Alternative 2 could result in a population growth of 107 residents to Goleta, which is 38 fewer residents than the proposed project. Given that the proposed project's growth would be within Santa Barbara County Association of Governments (SBCAG) growth projections utilized within the 2022 Ozone Plan, Alternative 2 would also be within SBCAG growth projections and therefore would not conflict with the 2022 Ozone Plan. Alternative 2's impacts related to conflicts with an air quality management plan would be reduced compared to the proposed project, but would remain less than significant.

Alternative 2 would construct fewer structures than the proposed project. As such, Alternative 2 would result in less criteria air pollutant emissions during construction compared to the proposed project. Given that construction of the proposed project would not exceed Santa Barbara Air Pollution Control District (SBCAPCD) emissions thresholds, Alternative 2's construction would also not exceed SBCAPCD thresholds. Compared to the proposed project, Alternative 2 would reduce vehicle trips, include use of solar panels for the greenhouse complex, and reduce the number of residences, which would reduce air pollutant emissions. However, the use of farming equipment for agriculture during operation would generate increased particulate matter emissions compared to the proposed project. Given the potential for the regular use of farming equipment, Alternative 2's impacts related to release of criteria air pollutants would be greater compared to the proposed project but would remain less than significant.

As with the proposed project, construction of Alternative 2 would include the use of Tier 4 emissions standards for construction equipment required as a Condition of Approval which would minimize exhaust emissions from nonroad diesel engines and would occur in compliance with SBCAPCD Rule 323.1, Rule 329, and Rule 345 to minimize the amount of volatile organic compound, reactive organic compound, and fugitive dust emissions on-site during construction. During operation, Alternative 2 would involve the use of a single-family residence, farmworker housing, a greenhouse complex, and agricultural uses. The single-family residence and farmworker housing would not include the use of equipment that would increase toxic air emissions at the project site. The greenhouse gas complex may require the use of generators to provide backup power in the event of solar panel failure; however, given that these generators would be used in emergency cases which would be infrequent and temporary, the use of generators would not result in a substantial generation of air pollutants. Use of farming equipment for agricultural uses during operation would generate increased emissions compared to the proposed project. Given the potential for the regular use of farming equipment proximate to on- and off-site residential receptors, Alternative 2 would expose residential receptors to higher amounts of pollutants compared to the proposed project, which could lead to adverse health risks. Overall, Alternative 2's impacts related to the release of toxic air contaminants would be greater compared to the proposed project but would remain less than significant.

Alternative 2 would construct fewer structures than the proposed project and therefore would result in a fewer amount of construction odors generated from the use of construction equipment compared to the proposed project. Alternative 2's construction odors would be intermittent, temporary, and would dissipate rapidly with distance from in-use construction equipment. Unlike the proposed project, Alternative 2 would include agricultural uses on site, which could include row crop cultivation, orchards, or animal grazing. The use of farm equipment would result in similar odors as construction equipment, which would be intermittent, temporary, and would dissipate rapidly with distance from the farm equipment itself. However, the use of the project site for grazing could result in odors associated with grazing animals on-site. Therefore, Alternative 2's impact related to odors would be greater than the proposed project, but would remain less than significant.

Overall, based on the above, Alternative 2's impact related to conflicts with an air quality management plan would be reduced compared to the proposed project, but would remain less than significant. Alternative 2's impact related to criteria air pollutants, toxic air contaminants, and odors would be greater than the proposed project but remain less than significant.

c. Biological Resources

Alternative 2 would have a reduced development footprint compared to the proposed project because it would include fewer structures. Although ground disturbance would occur for agricultural uses (e.g., tilling, etc.), this would be less intensive than the ground disturbance required for development of the proposed project. Therefore, Alternative 2 would have less potential to directly and indirectly affect special-status plant and wildlife species on-site as the proposed project. As with the proposed project, Alternative 2 would require implementation of Mitigation Measures NOI-1 and BIO-1 through BIO-6 to reduce potential impacts to special-status plant and wildlife species to a less than significant level. Alternative 2's impacts related to special-status plant and wildlife species would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated.

Given Alternative 2's development footprint, it would have less potential than the proposed project to result in direct impacts to arroyo willow thicket, black sage – California sagebrush scrub, and eucalyptus grove that serves as raptor roosting habitat ESHA. Alternative 2 would require implementation of Mitigation Measures BIO-3, BIO-4, and BIO-7 to reduce potential impacts to arroyo willow thicket, black sage – California sagebrush scrub, and eucalyptus grove that serves as raptor roosting habitat ESHA. Alternative 2's impacts related to ESHA would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated.

Alternative 2 includes fewer structures compared to the proposed project and would have less potential than the proposed project to remove riparian habitat during construction which may be a jurisdictional resource. Alternative 2 would require implementation of Mitigation Measures BIO-3 and BIO-4 to reduce potential construction impacts to jurisdictional resources. Alternative 2's operation would include greater use of outdoor pesticides compared to the proposed project for the agricultural uses on-site; however, operational activities would be conducted in accordance with Goleta Municipal Code Section 17.030.060 which prohibits the use of insecticides, herbicides, artificial fertilizers, or other toxic chemical substances within and adjacent to ESHA. Alternative 2 would have a reduced potential to disturb jurisdictional resources compared to the proposed project and impacts would remain less than significant with mitigation incorporated.

Alternative 2 includes fewer structures compared to the proposed project, but construction noise could still result in temporary disruption of wildlife movement. Accordingly, Alternative 2 would require implementation of Mitigation Measure NOI-1 to reduce potential impacts to wildlife

movement related to construction noise to a less than significant level. During operation, the use of farming equipment such as tractors would increase on-site operational noise compared to the proposed project which could disturb wildlife movement. As described further in the *Noise* discussion below, the City would require the use of noise-reducing equipment on farm equipment in order to reduce operation noise below the City's noise threshold. Alternative 2 would introduce fewer new sources of light and glare as the proposed project, which would result in less potential to adversely impact wildlife movement due to light and glare. Alternative 2 would result in decreased human presence at the project site compared to the proposed project because Alternative 2 would include fewer residences and less potential for direct and indirect population growth compared to the proposed project. This human presence would not substantially impede wildlife movement as the project site is not designated as a wildlife corridor, and no fencing or structures would block access to the creek. Due to the increase in operational noise compared to the proposed project, Alternative 2's impact on wildlife corridors and wildlife movement would be greater compared to the proposed project but would remain less than significant with mitigation incorporated.

Alternative 2 would have a reduced potential to conflict with City of Goleta General Plan/Coastal Land Use Plan Policies CE 1.6, CE 1.9, CE 2.3, CE 5.3, and CE 9.5, and the City's Urban Forest Management Plan, compared to the proposed project due to the reduced development footprint and ground disturbance. Alternative 2 would require implementation of Mitigation Measures BIO-3, BIO-4, BIO-7, and BIO-8. As with the proposed project, Alternative 2 would remain inconsistent with Policies CE 1.9 and 2.3; however, these inconsistencies are related to policy-level distinctions and the environmental impacts of development within ESHA and Streamside Protection Area buffers would be reduced to a less than significant level with implementation of the abovementioned mitigation measures, and thus would not result in a significant impact on the environment. Alternative 2's impact related to conflicts with local policies and ordinances protecting biological resources would be reduced compared to the proposed project and would remain less than significant with mitigation incorporated..

As with the proposed project, Alternative 2 would not be located in an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Alternative 2 would have no impact related to conflicts with these plans, which would be the same level of impact compared to the proposed project.

Based on the above, Alternative 2's impact related to special-status plant and wildlife species, riparian habitat and ESHA, jurisdictional features, and conflicts with local policies or ordinances protecting biological resources would be reduced compared to the proposed project and would remain less than significant with mitigation incorporated. Alternative 2's impact related to wildlife corridors and wildlife movement would be greater compared to the proposed project but would remain less than significant with mitigation incorporated. As with the proposed project, Alternative 2 would have no impact related to conflicts with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

d. Cultural Resources

Alternative 2 would be located on the same site as the proposed project, which does not contain structures eligible as historical resources. As with the proposed project, Alternative 2 would have no impact on historical resources.

Alternative 2 would have a reduced development footprint compared to the proposed project because it would include fewer structures. Although ground disturbance would occur for agricultural uses (e.g., tilling, etc.), this would be less intensive than the ground disturbance required for

development of the proposed project. Therefore, Alternative 2 would reduce the potential to encounter unknown archaeological resources. Mitigation Measures CUL-1 through CUL-3 would continue to be required, which would minimize potential impacts to unanticipated discoveries of archaeological resources by requiring archaeological monitoring, a cultural resources sensitivity meeting for construction personnel, and implementation of appropriate procedures for evaluation and treatment of any discoveries made during construction. Alternative 2's impacts would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated.

Alternative 2 would reduce the potential to encounter unknown human remains compared to the proposed project due to its reduced development footprint and less intensive ground disturbance. As with the proposed project, in the event of unanticipated discovery of human remains, the construction contractor would be required to comply with State of California Health and Safety Code Section 7050.5 and human remains would be preserved in accordance with the requirements of Public Resources Code Section 5097.98. Alternative 2's impacts related to human remains would be reduced compared to the proposed project and would remain less than significant.

Based on the above, Alternative 2 would have a reduced impact compared to the proposed project due to Alternative 2's reduced ground disturbing activities and development footprint. As with the proposed project, Alternative 2 would have no impact on historical resources. Alternative 2's impacts related to archaeological resources would remain less than significant with mitigation incorporated. Alternative 2's impacts related to human remains would remain less than significant.

e. Geology and Soils

Alternative 2 would be located on the same site as the proposed project. There is no Alquist-Priolo Fault Zone located on the site. Therefore, Alternative 2 would have no impact involving fault rupture, which would be the same level of impact as the proposed project.

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. As with the proposed project, Alternative 2 would implement Mitigation Measure GEO-1, which requires incorporation of geotechnical recommendations into grading and building plans. Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to groundshaking to a less than significant level through incorporation of structural integrity recommendations. Because Alternative 2 would reduce the amount of development and people that would be introduced on-site compared to the proposed project, Alternative 2's impacts related to seismic ground shaking would be reduced compared to the proposed project, but would remain less than significant with mitigation incorporated.

Alternative 2 would be subject to the same negligible liquefaction, lateral spreading, subsidence, and collapse risks as the proposed project. As with the proposed project, Alternative 2 would require implementation of Mitigation Measure GEO-1 requiring recommendations from the project-specific geotechnical reports to be put into grading and building plans. Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to landslides on the project site to a less than significant level through incorporation of slope stability recommendations. Because Alternative 2 would reduce the amount of development and people that would be introduced on-site compared to the proposed project, Alternative 2's impacts related to liquefaction, lateral spreading, subsidence, and collapse risks would be reduced compared to the proposed project, but would remain less than significant with mitigation incorporated.

Alternative 2 would be subject to the same landslide risks as the proposed project. As with the proposed project, Alternative 2 would require implementation of Mitigation Measure GEO-1 to incorporate slope stability recommendations into grading and building plans. Because Alternative 2 would reduce the amount of development and people that would be introduced on-site compared to the proposed project, Alternative 2's impacts related to landslide risks would be reduced compared to the proposed project, but would remain less than significant with mitigation incorporated.

Alternative 2 would have a reduced development footprint compared to the proposed project because it would include fewer structures than the proposed project. Although ground disturbance would occur for agricultural uses (e.g., tilling, etc.), this would be less intensive than the ground disturbance required for development of the proposed project. Alternative 2 would therefore have less potential for erosion of on-site soils during construction compared to the proposed project. As with the proposed project, Alternative 2's construction activities must obtain coverage from the Construction Stormwater General Permit which would require implementation of a Stormwater Pollution Prevention Plan and BMPs for erosion control. As with the proposed project, Alternative 2 would not substantially increase the rate of runoff on the site compared to existing conditions with installation of stormwater control infrastructure. Alternative 2 could result in erosion during operation due to on-site agricultural uses which would not occur with the proposed project. Such grading would be required to comply with Section 15.09.080 of the City's Municipal Code which sets standards specific for grading for agricultural practices, including obtaining erosion control permits, implementation of long-term erosion control BMPs, and required inspections. In addition, agricultural practices on-site would be subject to the Central Coast Region Water Quality Control Board's *General Waste Discharge Requirements for Discharges from Irrigated Lands* (Order No. R3-2021-0040) which requires that land managers for agricultural lands implement BMPs to ensure surface water discharges from irrigation do not contribute to substantial erosion on-site. Therefore, Alternative 2's impact related to erosion would be greater than the proposed project but would remain less than significant.

As with the proposed project, Alternative 2 would locate development on soil with high to critical expansion potential of soils. The construction contractor would be required to comply with the California Building Code, including the use of non-expansive fill material, to minimize the potential for structural hazards associated with soil expansion. As with the proposed project, Alternative 2 would require implementation of Mitigation Measure GEO-1 requiring recommendations from the project-specific geotechnical reports to be put into grading and building plans. Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to expansive soils on the project site to a less than significant level through incorporation of structural integrity recommendations into the project, which would ultimately minimize the potential for expansive soils to result in risks to life or property. Because Alternative 2 would reduce the amount of development and people that would be introduced on-site compared to the proposed project, Alternative 2's impacts related to expansive soils would be reduced compared to the proposed project, but would remain less than significant with mitigation incorporated.

Alternative 2 would not involve the use of septic tanks or alternative wastewater disposal systems. Alternative 2 would result in no impact, which would be the same level of impact as the proposed project.

Alternative 2 would have a reduced potential to encounter unknown paleontological resources compared to the proposed project due to a reduced development footprint and less intensive ground disturbing activities. Alternative 2 would require the implementation of Mitigation Measure GEO-2 to reduce potential construction impacts to paleontological resources and unique geologic features to a

less than significant level by requiring a Worker Environmental Awareness Program training, monitoring, and setting forth procedures for the recovery, identification, and curation of fossils discovered during construction. Alternative 2's impacts related to paleontological resources and unique geologic features would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated.

Based on the above, Alternative 2's would have no impact related to earthquake faults and septic tanks, the same as the proposed project. Alternative 2's impacts related to groundshaking, landslides, and expansive soils, would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated. Alternative 2's impacts related to liquefaction, lateral spreading, subsidence, and collapse, would be reduced compared to the proposed project and would remain less than significant. Alternative 2's would have no impact related to septic tanks, the same as the proposed project. Alternative 2's impacts related to erosion would be greater compared to the proposed project but would remain less than significant. Alternative 2's impacts related to paleontological resources would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated.

f. Greenhouse Gas Emissions

Alternative 2 would include fewer structures than the proposed project, leading to a shorter construction schedule and lower construction-related GHG emissions than the proposed project. Alternative 2 would include greenhouse facilities which would be energy-intensive uses due to the consistent monitoring and temperature adjustment requirements for vegetation growth within the greenhouses. In addition, Alternative 2 would include single-family residence and farmworker housing which would utilize energy for heating and cooling purposes. However, Alternative 2's greenhouse facilities would be powered with solar panels and Alternative 2's single-family residence and farmworker housing would be all-electric and, therefore, the electricity used at the project site would not result in GHG emissions associated with procurement of electricity. Alternative 2 would result in fewer daily vehicle trips to and from the project site compared to the proposed project because Alternative 2 would result in less people on-site compared to the proposed project. Due to a reduction in vehicle trips to and from the project site, Alternative 2 would reduce GHG emissions from vehicle travel compared to the proposed project. However, Alternative 2's agricultural uses would include the use of farming equipment that would utilize natural gas and diesel fuel. Unlike the proposed project, which would be all-electric during operation, this use of natural gas and diesel fuel would generate increased operational GHG emissions on the project site. Given Alternative 2's increase in operational GHG emissions compared to the proposed project, Alternative 2 would result in greater impacts related to GHG emissions compared to the proposed project, but impacts would remain less than significant.

As with the proposed project, Alternative 2 would include design features to promote renewable energy use and energy efficiency which contribute to the creation of minimal GHG emissions. Alternative 2 would include the use of renewable energy from solar panels in compliance with SBCAG 2050 Regional Transportation Plan/Sustainable Community Strategy policies. Alternative 2 would incorporate water efficient fixtures within the residence, farmworker housing, greenhouse facilities, and for on-site irrigation for agricultural practices to reduce water consumption for landscaping, plumbing, and irrigation. Alternative 2's greenhouse solar panels would not generate GHG emissions due to electricity use. Alternative 2's residence and farmworker housing would not utilize natural gas and would be constructed in accordance with the energy reduction standards set forth in CALGreen and the Building Energy Efficiency Standards, including the CALGreen requirements for the installation

of solar photovoltaic panels. As a result, Alternative 2 would minimize GHG emissions from stationary sources. As with the proposed project, Alternative 2 would place the on-site residential development within proximity to existing transit and bicycle facilities on Cathedral Oaks Road which would encourage alternative transportation and minimize GHG emissions associated with mobile use (i.e., vehicle trips). Accordingly, Alternative 2 would be consistent with applicable GHG reduction plans. Therefore, Alternative 2's impact related to conflicts with GHG reduction plans would be similar to the proposed project and impacts would remain less than significant.

Based on the above, Alternative 2's GHG emissions impacts would be increased compared to the proposed project due to increased operational GHG emissions associated with farming on the project site, but impacts would remain less than significant. Alternative 2's impacts related to conflicts with GHG reduction plans would be similar to the proposed project and would remain less than significant.

g. Hazards and Hazardous Materials

Alternative 2 would construct fewer structures than the proposed project, leading to a shorter construction schedule and associated reduction in the use of hazardous materials during construction. Hazardous materials used during construction of Alternative 2 would be handled in accordance with the same regulations as the proposed project, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Waste Control Law, and California Code of Regulations Title 22. These regulations prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce risk of spills. Construction of Alternative 2 would also occur in compliance with Chapter 15.09 of the City's Municipal Code to reduce potential spills. During operation, transport, use, and disposal of pesticides for the greenhouse complex and agricultural uses on-site would be increased compared to the proposed project due to an increase in pesticide use at the greenhouse complex and potentially for on-site crop growth or orchards. However, any use of household hazardous materials or other hazardous materials such as pesticides during operation would occur in compliance with existing hazardous materials regulations established by United States Environmental Protection Agency and the State of California. Accordingly, Alternative 2's impact related to the routine transport, use, and disposal of hazardous materials would be greater compared to the proposed project but would remain less than significant.

As with the proposed project, Alternative 2 would include demolition of the existing on-site residence, garage, and barn, which have the potential to contain ACM and LBP. Alternative 2 would result in the same potential impact regarding the release of ACM and LBP from demolition of existing buildings. Mitigation Measures HAZ-1 and HAZ-2 would continue to be required, which would reduce potential hazardous material impacts associated with accidental releases of hazardous materials during demolition to a less than significant level. Alternative 2 would develop fewer residences and therefore less potential for radon exposure in residences; however, as with the proposed project, in accordance with Goleta General Plan/Coastal Land Use Plan Policy SE 1.9, radon testing would be required and, if on-site radon levels exceed the United States Environmental Protection Agency recommended threshold, as a Condition of Approval, the City would require the design of homes to comply with the standards for reducing radon in single-family residences implemented by the American Association of Radon Scientists and Technologists and American National Standards Institute. Operation of Alternative 2's residences would involve minimal transport, use, and disposal of hazardous materials for landscaping; however, use of the greenhouse complex and agricultural uses on-site (i.e., pesticide use) would be increased compared to the proposed project's landscaping. Alternative 2's operational activities would be required to comply with applicable federal, state, and local regulations, which prescribe measures to reduce the risk of accidental spills. Accordingly, Alternative 2's impact related

to the accidental release of hazardous materials would be greater than the proposed project but would remain less than significant with mitigation incorporated.

Construction of Alternative 2 would occur the same distance from South Coast Montessori as the proposed project. Alternative 2's construction activities would have reduced potential compared to the proposed project to create a significant hazard involving the release of hazardous materials into the environment due to reduced construction activities, which would be minimized with implementation of Mitigation Measures HAZ-1 and HAZ-2. However, Alternative 2 would have a greater operational risk of hazardous material release due to increased pesticide use on-site. Alternative 2's impact related to handling hazardous materials within 0.25-mile of a school would be increased compared to the proposed project but would remain less than significant with mitigation incorporated.

Alternative 2 would be located on the same site as the proposed project which is not located on a site listed pursuant to Government Code Section 65962.5. No impact would occur related to listed hazardous materials sites, which would be the same level of impact as the proposed project.

Alternative 2 would be located on the same site as the proposed project which is not located within the noise or safety contours of the Santa Barbara Airport. No impact related to excessive noise or safety hazards due to proximity to an airport would occur, which would be the same level of impact as the proposed project.

Alternative 2 would include construction within Cathedral Oaks Road for utility installation and therefore would have similar potential to interfere with emergency response or evacuation of Cathedral Oaks Road as the proposed project, which would be minimized with implementation of a Construction Traffic Management Plan. As with the proposed project, Alternative 2's operations would not introduce activities that could impede or interfere with the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan or emergency evacuations on Cathedral Oaks Road. Furthermore, Alternative 2 would result in fewer vehicle trips compared to the proposed project due to the reduced residential development on-site which would result in less potential to impede traffic on Cathedral Oaks Road during evacuation. Alternative 2's impact related to impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan would be reduced compared to the proposed project but would remain less than significant.

Alternative 2 would be located within the same fire hazard severity zones as the proposed project and therefore be exposed to the same fire risks as the proposed project. However, because Alternative 2 would result in less development compared to the proposed project, Alternative 2 would have less potential to exacerbate fire risk during construction. As with the proposed project, construction of Alternative 2 would not include unique activities that could exacerbate fire risk, such as storage of high quantities of flammable liquids and fuels. As with the proposed project, construction of Alternative 2 would comply with California Public Resources Code Sections 4442, 4427, 4428, and 4431, and California Fire Code Section 3312 to minimize the potential for wildland fire. Alternative 2's structures would result in similar fire risks as the proposed project, which would be minimized with adherence to the standards in the California Fire Code, California Building Code, and California Code of Regulations Title 14. Alternative 2 would result in the use of farm equipment on-site which would increase operational fire risk compared to the proposed project; however, the use of such equipment would occur in accordance with California Public Resources Code Section 4442 which mandates the use of spark arrestors on machinery which uses an internal combustion engine. As with the proposed project, Alternative 2 would include a Construction Traffic Management Plan which would minimize disruptions to Cathedral Oaks Road, including in the event of emergency

evacuation. Overall, Alternative 2's impact related to wildland fire would be greater compared to the proposed project but would remain less than significant.

Based on the above, Alternative 2's impacts related to the transport, use, and disposal of hazardous materials and wildland fire would be greater compared to the proposed project and would remain less than significant. Alternative 2's impact related to emergency evacuation and wildland fire would be reduced compared to the proposed project and would remain less than significant. Alternative 2's impacts related to accidental release of hazardous materials and handling hazardous materials proximate to a school would be greater than the proposed project but would remain less than significant with mitigation incorporated. As with the proposed project, Alternative 2 would have no impacts related to hazardous materials sites or airport hazards.

h. Hydrology and Water Quality

Given the reduction in construction activities, Alternative 2 would have a reduced potential to degrade water quality compared to the proposed project during construction. As with the proposed project, Alternative 2 would include demolition of existing on-site structures, which could discharge ACB and LBP to on-site soils where they could then be transported off-site in stormwater runoff. Mitigation Measures HAZ-1 and HAZ-2 would continue to be required and would minimize the potential for the accidental release of ACB and LBP. Construction of Alternative 2 would occur in compliance with the Construction Stormwater General Permit which requires implementation of construction site BMPs to minimize the creation of stormwater pollutants during construction. During operation, given the agricultural uses that would occur, Alternative 2 would have greater potential to result in substantial runoff or polluted runoff compared to the proposed project. Alternative 2 would be required to include stormwater infrastructure to treat and discharge stormwater consistent with the requirements of the Central Coast Regional Water Quality Control Board during operation which would ensure construction activities would minimize substantial runoff water post-construction and adequately treat stormwater prior to discharge in El Encanto Creek or the City's storm drain system. As with the proposed project, Alternative 2 would not substantially increase the rate of runoff on the site compared to existing conditions with installation of stormwater control infrastructure. Alternative 2 could result in erosion during operation due to on-site agricultural uses, which would not occur with the proposed project. Operational agricultural uses would occur in compliance with Section 15.09.080 of the City's Municipal Code which sets standards specific for grading for agricultural practices, including obtaining erosion control permits, implementation of long-term erosion control BMPs, and required inspections. In addition, agricultural practices on-site would be subject to the Central Coast Region Water Quality Control Board's *General Waste Discharge Requirements for Discharges from Irrigated Lands* (Order No. R3-2021-0040) which requires that land managers for agricultural lands implement BMPs to ensure surface water discharges from irrigation do not exceed water quality objectives or contribute substantial pollutants to surface water or groundwater. Alternative 2's overall impacts related to water quality degradation, erosion, and the introduction of substantial polluted runoff and exceedances of stormwater capacity would be greater compared to the proposed project but would remain less than significant.

Given the project site soils are not conducive for infiltration in the existing condition, Alternative 2's smaller footprint would not substantially change groundwater infiltration rates on-site or result in substantial interference to groundwater recharge compared to the proposed project. As described in the *Utilities and Service Systems* discussion below, Alternative 2 would result in a water demand of approximately 16.29 acre-feet per year (AFY), which would be 1.19 AFY greater than the proposed project; therefore, Alternative 2 would require more groundwater use compared to the proposed

project. As with the proposed project, Alternative 2 would be subject to Goleta Water District (GWD) review prior to issuance of a Can and Will Serve Letter which would ensure that Alternative 2 could receive water from GWD, which supplies water partially from the Goleta Groundwater Basin. Alternative 2 would be subject to the same GWD regulatory measures as the proposed project requiring water conservation during times of drought. Alternative 2's impact related to substantially decreasing groundwater supplies or interfering with groundwater recharge would be greater compared to the proposed project but would remain less than significant.

As with the proposed project, Alternative 2's stormwater infrastructure would be sized to collect and detain stormwater and release it at a controlled rate to ensure discharge runoff rates would not exceed existing conditions for the 100-year flood event consistent with the requirements of the Central Coast Central Coast Regional Water Quality Control Board. The project site is not located within a flood hazard zone and Alternative 2 would therefore not place structures in a floodplain in a manner that could increase flooding. Alternative 2's impact related to on- or off-site flooding would be similar to the proposed project and would remain less than significant.

Alternative 2 would occur at the same site as the proposed project and therefore would be located outside of a flood hazard zone. As with the proposed project, Alternative 2's stormwater infrastructure would discharge stormwater flows from the site so they would not increase compared existing conditions, the proposed project would not alter off-site flooding or drainage. Like the proposed project, no impact related to impeded or redirected flood flows would occur.

Alternative 2 would occur at the same site as the proposed project and therefore would be located outside of a flood hazard zone, tsunami inundation zone, and seiche zone and therefore would not risk pollutant release due to inundation within these zones. Like the proposed project, no impact would occur.

Given the reduced scope of development activities compared to the proposed project, but increased erosion potential during operation due to agricultural uses on-site, Alternative 2 would have reduced potential to conflict with the *Basin Plan* compared to the proposed project. As with the proposed project, Alternative 2 would adhere to the requirements of the Construction Stormwater General Permit and Chapter 13.04 and Chapter 15.09 of the City's Municipal Code to minimize water quality impacts, and, given that Alternative 2 could include alterations or demolition of the existing residence, would require Mitigation Measures HAZ-1 and HAZ-2 to reduce potential water quality impacts to a less than significant level. In addition, operational agricultural uses would occur in compliance with Section 15.09.080 of the City's Municipal Code which sets standards specific for grading for agricultural practices, including obtaining erosion control permits, implementation of long-term erosion control BMPs, and required inspections. In addition, agricultural practices on-site would be subject to the Central Coast Region Water Quality Control Board's *General Waste Discharge Requirements for Discharges from Irrigated Lands* (Order No. R3-2021-0040) which requires that land managers for agricultural lands implement BMPs to ensure surface water discharges from irrigation do not contribute to substantial erosion on-site. Accordingly, Alternative 2's impacts related to conflicts with the *Basin Plan* would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated.

As described above, Alternative 2 would require greater water use than the proposed project and would not adversely impact groundwater supplies. Accordingly, Alternative 2 would not interfere with the management of the Basin in accordance with the Wright Judgement. Alternative 2's impact related to conflicts with the Wright Judgement or GWD's *Groundwater Management Plan* would be the greater compared to the proposed project but impacts would remain less than significant.

Based on the above, Alternative 2's construction impacts related to water quality, polluted runoff, erosion, and conflict with water quality plans or groundwater management plans would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated. Alternative 2's operational impacts related to water quality, polluted runoff, erosion, and conflict with water quality plans or groundwater management plans would be greater compared to the proposed project but would remain less than significant with mitigation incorporated. Impacts related to groundwater would be greater compared to the proposed project but would remain less than significant. As with the proposed project Alternative 2's impact related to on- or off-site flooding would remain less than significant. As with the proposed project, no impacts related to flood hazard zones and release of pollutants from inundation would occur.

i. Land Use and Planning

As with the proposed project, Alternative 2 would not divide an established community because Alternative 2 would include development on an underutilized parcel in Goleta and would not include any components such as new roads or highways which would divide existing communities. Alternative 2's impact related to the physical division of an established community would be the same as the proposed project and would remain less than significant.

Unlike the proposed project, Alternative 2 would be designed consistent with the standards of the AG-II zoning district. Similar to the proposed project, Alternative 2 would be consistent with the City's zoning standards. Alternative 2 would have a reduced development footprint compared to the proposed project and therefore would have reduced potential to be inconsistent with City of Goleta General Plan/Coastal Land Use Plan Policy CE 1.6, CE 1.9, CE 2.3, CE 5.3, and CE 9.5. As with the proposed project, Alternative 2 would be designed to be consistent with Policy CE 2.2 regarding encroachment into the Streamside Protection Area buffer. As with the proposed project, Alternative 2 would include implementation of Mitigation Measures BIO-1 through BIO-8, CUL-1 through CUL-3, GEO-1, GEO-2, HAZ-1, HAZ-2, and NOI-1 to ensure Alternative 2's consistency with other applicable City of Goleta General Plan/Coastal Land Use Plan policies. Alternative 2's impacts related to land use plans and policies would be similar to the proposed project but would remain less than significant with mitigation incorporated. However, Alternative 2 would not assist in fulfilling the City's Regional Housing Needs Allocation requirements identified within the City's 2023-2031 Housing Element as Alternative 2 would not include new residential development aside from potential renovations and expansions to an existing on-site residence and farmworker housing.

Based on the above, Alternative 2 would have the same impact as the proposed project related to the physical division of an established community, which would remain less than significant. Alternative 2 would have a reduced impact related to land use policy consistency compared to the proposed project, which would remain less than significant with mitigation incorporated.

j. Noise

Due to the reduction in construction activities compared to the proposed project, Alternative 2 would result in less construction noise compared to the proposed project. Alternative 2's construction activities would occur the same distance from sensitive receptors. As with the proposed project, Alternative 2 would require implementation of Mitigation Measure NOI-1 to ensure construction noise levels do not exceed 65 dBA construction noise standards. Accordingly, Alternative 2's construction noise impact would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated.

Given Alternative 2's reduction in structures compared to the proposed project, Alternative 2 would use less heating, ventilation, and air conditioning units on-site compared to the proposed project. Therefore, Alternative 2 would result in less stationary operational noise compared to the proposed project. However, Alternative 2 would include the use of farm equipment such as tractors which would generate on-site noise during operation that would not occur in accordance with the proposed project. The use of a tractor at the project site could generate noise levels of 74 A-weighted decibels at a distance of 100 feet, which would exceed the City's 65 A-weighted decibels Community Noise Equivalent Level standard. However, the City would require the use of noise-reducing equipment on farm equipment in order to reduce operation noise below the City's noise threshold. Therefore, as with the proposed project, operational noise associated with these units would not exceed City noise thresholds. Accordingly, Alternative 2's stationary operational noise impact would be greater compared to the proposed project but would remain less than significant.

Alternative 2 would decrease vehicle trips to and from the project site compared to the proposed project. The proposed project would not result in a 3 dBA increase in traffic noise due to increases in vehicle trips; therefore, Alternative 2 would also not result in a 3 dBA increase in traffic noise. Alternative 2's operational traffic noise impact would be reduced compared to the proposed project but would remain less than significant.

Alternative 2 would result in a reduced scope of development activities within a reduced project footprint compared to the proposed project and therefore would result in less groundborne vibration levels from construction at nearby sensitive receptors. Alternative 2 would require the use of similar construction equipment as the proposed project. As the proposed project's vibration levels would not exceed the Federal Transit Administration's groundborne vibration threshold, Alternative 2's construction would also not exceed the Federal Transit Administration's groundborne vibration threshold. As with the proposed project, Alternative 2's operational activities would not include railroads or subways or other projects known to generate excessive groundborne vibration. The farm equipment that could be used under Alternative 2 (i.e., tractors) would result in additional groundborne vibration during operation compared to the proposed project; however, this equipment would not result in groundborne vibration levels that could cause damage to on-site structures. Alternative 2's groundborne vibration impacts would be reduced compared to the proposed project but would remain less than significant.

As with the proposed project, Alternative 2 would be located outside of the noise contours of the Santa Barbara Airport. As with the proposed project, Alternative 2 would have no impact related to excessive airport noise.

Based on the above, Alternative 2's construction noise impacts would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated. Alternative 2's operational noise impacts and groundborne vibration impacts would be greater compared to the proposed project but would remain less than significant. Like the proposed project, Alternative 2 would have no impact related to airport noise.

k. Transportation and Circulation

As with the proposed project, Alternative 2 would not include elements that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As with the proposed project, Alternative 2 would result in temporary lane, bicycle route, or sidewalk closures on Cathedral Oaks Road for utility installation, the impacts of which would be minimized with implementation of a Construction Traffic Management Plan. Access to the project site would be subject to review and approval by the City and the Santa

Barbara County Fire Department (SBCFD) which would minimize the potential for vehicle to pedestrian and vehicle to cyclist conflicts. However, Alternative 2 would not include the extension of the Class I trail parallel to Cathedral Oaks Road and therefore, unlike the proposed project, would not support the City's policies for alternate modes of transportation. Therefore, Alternative 2's impact related to conflicts with a program, plan, ordinance, or policy addressing the circulation system would be greater than proposed project but would remain less than significant.

Alternative 2 would require less construction activity than the proposed project and therefore would generate less short-term VMT increases than the proposed project. This construction-related VMT increase would be temporary and would not have a lasting effect on the overall transportation network or long-term VMT patterns in the area. 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) was utilized to assess potential impacts related to VMT. As Alternative 2 would include both a single-family residence and a commercial component (i.e., greenhouse facility, agricultural uses, and farmworker housing), each of these components are evaluated separately consistent with guidance in Resolution 20-44. The City has identified areas where operation of a work-based project would be presumed to have a less than significant impact on increases in VMT. The project site is within the work-based screening area; therefore, Alternative 2's greenhouse complex and agricultural uses, including farmworker housing used to house employees working at the project site, would be presumed to have a less than significant impact related to VMT. The City has also adopted a VMT screening threshold for developments that would result in less than 110 vehicle trips per day, which is used for the purposes of this analysis to evaluate Alternative 2's residential component. Given Alternative 2 would only include one single-family residence and would not result in 110 vehicle trips per day, Alternative 2's single-family residence would be presumed to have a less than significant impact related to VMT. Accordingly, Alternative 2's impacts related to conflicts with *CEQA Guidelines* Section 15064.3(b) would be reduced to a less than significant level, compared to the proposed project's significant and unavoidable impact.

As with the proposed project, Alternative 2 would include access points on Cathedral Oaks Road that would be designed to provide clear visibility and minimize potential offset intersection conflicts in accordance with SBCFD and City requirements. Alternative 2's circulation design would be subject to review and approval from SBCFD and the City which would minimize potential for transportation design hazards. Alternative 2 would not present new conflicts with incompatible uses, as any equipment used for the greenhouse complex and agricultural uses would not be kept within the roadway. Accordingly, Alternative 2's impacts to increased hazards would be similar to the proposed project and would remain less than significant.

As with the proposed project, Alternative 2's construction equipment staging and worker parking would occur entirely on-site which would minimize the potential for construction related vehicles and equipment to result in inadequate emergency access. As with the proposed project, Alternative 2 would also include implementation of a Construction Traffic Management Plan as a Condition of Approval to minimize disruptions on Cathedral Oaks Road. As with the proposed project, Alternative 2 would be designed in accordance with all applicable SBCFD standards to maintain adequate emergency access. As with the proposed project, SBCFD and the City would review and approve Alternative 2's design, which would ensure Alternative 2 would provide adequate egress for emergency access. Based on Alternative 2's reduction in people on-site compared to the proposed project Alternative 2 would result in fewer daily vehicle trips to and from the project site compared to the proposed project which would result in less potential to impede emergency access on Cathedral

Oaks Road. Therefore, Alternative 2's impacts to emergency access would be reduced compared to the proposed project but would remain less than significant.

Based on the above, Alternative 2's impacts related to conflicts with transportation plans and policies would be greater than the proposed project but would remain less than significant. Alternative 2 would have a less than significant impact on conflicts with *CEQA Guidelines* Section 15064.3(b), compared to the proposed project's significant and unavoidable impact. Alternative 2 would result in similar impacts related to transportation hazards which would remain less than significant. Alternative 2's impacts to emergency access would be reduced compared to the proposed project but would remain less than significant.

l. Tribal Cultural Resources

Alternative 2 would have a reduced development footprint compared to the proposed project because it would include fewer structures. Although ground disturbance would occur for agricultural uses (e.g., tilling, etc.), this would be less intensive than the ground disturbance required for development of the proposed project. Therefore, Alternative 2 would have reduced potential to result in impacts to unknown tribal cultural resources compared to the proposed project. Alternative 2 would require implementation of Mitigation Measures CUL-1 through CUL-3 to reduce potential impacts to tribal cultural resources of Native American origin by requiring construction monitoring and procedures and final disposition of any unanticipated discoveries of such resources.

Alternative 2's impact related to tribal cultural resources would be reduced compared to the proposed project but would remain less than significant with mitigation incorporated.

m. Utilities and Service Systems

Given the fewer structures compared to the proposed project, Alternative 2 would require a reduced amount of utility infrastructure compared to the proposed project. Given that the proposed project would not require the construction or relocation of utility infrastructure outside of project components, Alternative 2's reduced utility development, would also not necessitate the construction or relocation of additional utility infrastructure. Accordingly, Alternative 2's impact related to the relocation or construction of utility infrastructure would be reduced compared to the proposed project but would remain less than significant.

The proposed project would result in an annual water demand of approximately 15.1 AFY. For the purpose of this analysis, the County's 2024 *Environmental Thresholds and Guidelines Manual* water demand rate of 3.0 AFY per acre for greenhouses are used to estimate water demand from the greenhouse complex. Based on this water demand Alternative 2's greenhouse complex would result in an annual water demand of approximately 1.38 AFY. Alternative 2's water demand from the single-family residence would be 0.27 AFY, calculated using the County's 2024 *Environmental Thresholds and Guidelines Manual* water demand rate of 0.27 AFY per single family residence. Alternative 2's water demand from the farmworker housing would be 2.64 AFY, calculated using the County's 2024 *Environmental Thresholds and Guidelines Manual* water demand rate of 0.22 AFY per farmworker housing unit.[2] Conservatively assuming the undeveloped areas on-site are used entirely for row crops (i.e., the proposed agricultural use with the highest water demand), Alternative 2 would result in a water demand of approximately 13.38 AFY for agricultural uses, based on the County's 2024

[2] The rate used to calculate water demand for farmworker housing is based on a water demand rate for medium-density residential provided in the County's *Environmental Thresholds and Guidelines Manual*. This water demand rate appropriate for use as farmworker housing would generate less water demand than single-family residential given the reduction in size of the housing unit, the housing would be used for employees only, and the housing would not include individual lawns (Kiefer and Krentz 2018).

Environmental Thresholds and Guidelines Manual water demand rate of 1.0 AFY for field crops. Accordingly, Alternative 2 would result in a water demand of approximately 16.29 AFY, which would be 1.19 AFY greater than the proposed project. The proposed project's water demand would be within GWD's anticipated water demand projections which GWD would be able to accommodate with existing GWD water supplies. Alternative 2 would require a Can and Will Serve letter from GWD to supply water to the project site. Similar to the proposed project, if sufficient water allocations are not available at the time an application for a water supply allocation is submitted to GWD, water allocations could be purchased from another GWD customer to meet demands. Accordingly, Alternative 2's reduced water demand would not generate water demand exceeding GWD's projected supplies, the same as the proposed project. Alternative 2's impact on water supply would be greater compared to the proposed project but would remain less than significant.

Alternative 2's anticipated wastewater generation from the residence and farmworker housing would be 2,860 gallons per day, consistent with the wastewater generation factor of 220 gallons per day per residential unit used in the City of Goleta General Plan/Coastal Land Use Plan Final EIR (City of Goleta 2006b). Wastewater generation from Alternative 2's greenhouse complex is calculated consistent with the wastewater generation factor of 100 gallons per day per 1,000 square feet of habitable space for commercial development used in the City of Goleta's General Plan/Coastal Land Use Plan Final EIR (City of Goleta 2006b). Accordingly, wastewater generation from the greenhouse complex would be 2,000 gallons per day, or 0.002 million gallons per day (MGD). The total wastewater generation from Alternative 2 would be 0.0049 MGD, which would be approximately 0.005 MGD less than the proposed project's wastewater generation. Alternative 2's wastewater generation would be within the 0.93 MGD capacity of the wastewater treatment plant available to Goleta West Sanitary District customers. Therefore, Alternative 2's impacts related to wastewater treatment capacity would be reduced compared to the proposed project but would remain less than significant.

Alternative 2 would result in a reduced scope of development activities within a smaller project footprint than proposed project and therefore would result in less construction solid waste generation as the proposed project, which would not exceed the City's project specific demolition and construction threshold of 350 tons. During operation, Alternative 2's residence and farmworker housing would result in a solid waste generation of approximately 32 tons per year, consistent with the County's 2024 *Environmental Thresholds and Guidelines Manual* waste generation factor of 0.95 tons per year per residence multiplied by the average number of people per unit. Alternative 2's solid waste generation due to the greenhouse complex is calculated based on a waste generation factor of the total square footage of these facilities multiplied by 0.0057, consistent with the County's 2024 *Environmental Thresholds and Guidelines Manual* solid waste generate factor for miscellaneous services. Based on this solid waste generation rate, operation of the greenhouse complex would generate 114 additional gross tons of solid waste per year. Alternative 2's total gross solid waste generation would be 146 tons per year, which, with a 50 percent diversion rate, would be reduced to 73 tons per year. This amount of solid waste does not exceed the City's project-specific threshold of 196 tons per year. Therefore, Alternative 2's impacts related to solid waste would be greater compared to the proposed project but would remain less than significant.

Based on the above, Alternative 2's impacts on utility infrastructure would be reduced compared to the proposed project but would remain less than significant. Alternative 2's impact on water supply would be greater compared to the proposed project but would remain less than significant. Alternative 2's impacts on wastewater would be reduced compared to the proposed project but would remain less than significant. Alternative 2's impacts on solid waste would be greater than the proposed project but would remain less than significant.

n. Wildfire

Alternative 2 would be located on the same project site and therefore be located in the same high and very high fire hazard severity zones as the proposed project. Alternative 2 would include construction within Cathedral Oaks Road for utility installation and therefore would have similar potential to interfere with emergency response or evacuation of Cathedral Oaks Road as the proposed project, which would be minimized with implementation of a Construction Traffic Management Plan. As with the proposed project, Alternative 2's operations would not introduce activities that could impede or interfere with emergency evacuations on Cathedral Oaks Road. Alternative 2 would generate 38 fewer residents compared to the proposed project. Based on Alternative 2's reduction in people on-site compared to the proposed project, Alternative 2 would result in fewer daily vehicle trips to and from the project site compared to the proposed project which would result in less potential to impede traffic on Cathedral Oaks Road during evacuation. Alternative 2's impact related to impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan would be reduced compared to the proposed project but would remain less than significant.

Alternative 2 would require less construction activities due reduced structures on-site compared to the proposed project would result in less fire risk compared to the proposed project. As with the proposed project, construction of Alternative 2 would not include unique activities that could exacerbate fire risk, such as storage of high quantities of flammable liquids and fuels. Construction of Alternative 2 would be carried out in accordance with California Fire Code (CFC) Chapter 9, Section 3312 to require a water supply system on-site prior to the start of construction. Alternative 2's structures would be designed in accordance with applicable CFC, California Building Code, California Residential Code, and City General Plan/Coastal Land Use Plan requirements for fire safety. Compliance with these requirements would reduce the likelihood that structures would ignite from embers, radiant heat, or direct flame contact during a wildfire, as these requirements are designed to interrupt common ignition pathways and limit fire spread. As with the proposed project, Alternative 2 would be subject to review by SBCFD to ensure the proposed project design adheres to SBCFD development standards for adequate ingress and egress, fire hydrant spacing and water flow to the site, installation of a stored water protection system on-site, adequate fire sprinkler systems, and defensible space. Alternative 2 would result in the use of farm equipment on-site which would increase operational fire risk compared to the proposed project; however, the use of such equipment would occur in accordance with California Public Resources Code Section 4442 which mandates the use of spark arrestors on machinery which uses an internal combustion engine. Accordingly, Alternative 2's impact related to fire risk or pollutants from wildfire would be greater compared to the proposed project but would remain less than significant.

Alternative 2 would require the installation of less utility infrastructure on the project site than the proposed project. This utility infrastructure would be underground similar to the proposed project which would minimize fire risk. As with the proposed project, Alternative 2 would maintain a maximum 100-foot buffer zone near the riparian area on the southwestern border of the project site to further reduce spread of wildfire to adjacent land. Alternative 2 would occur in compliance with the defensible space requirement set forth in the SBCFD development standards, Chapter 49 of the CFC, and Section 51182 of the California Government Code to minimize fire risk. Accordingly, Alternative 2's impact related to infrastructure that could result in fire risk would be reduced compared to the proposed project but would remain less than significant.

Alternative 2 would be subject to the same risks of landslides as the proposed project, which could be similarly exacerbated due to fire. However, Alternative 2 would result in greater erosion potential than the proposed project due to the on-site agricultural activities. However, due to Alternative 2's reduced construction scope, Alternative 2 would result in less ground disturbing activities and therefore less potential to result in slope instability post-fire. Alternative 2 would include construction site BMPs to minimize erosion during construction activities in accordance with Chapter 15.09 of the City's Municipal Code. During operation, agricultural practices on-site would be subject to the Central Coast Region Water Quality Control Board's *General Waste Discharge Requirements for Discharges from Irrigated Lands* (Order No. R3-2021-0040) which requires that land managers for agricultural lands implement BMPs to ensure surface water discharges from irrigation do not contribute to substantial erosion on-site As with the proposed project, construction would implement measures such as the use of spark arresters on equipment or the halting of hot work during times when fire risk is high to minimize fire risk. Alternative 2 would result in the use of farm equipment on-site which would increase operational fire risk compared to the proposed project; however, the use of such equipment would occur in accordance with California Public Resources Code Section 4442 which mandates the use of spark arrestors on machinery which uses an internal combustion engine. As with the proposed project, Alternative 2 would include implementation of Mitigation Measure GEO-1 to minimize geotechnical risks associated with slope instability during construction and operation. Accordingly, Alternative 2's impacts related to the risk of slope instability exacerbated by fire risk would be greater compared to the proposed project but would remain less than significant with mitigation incorporated.

Based on the above, Alternative 2's impacts related to emergency evacuation and response and utility infrastructure installation would be reduced compared to the proposed project but would remain less than significant. Alternative 2's impacts related to fire risk and pollutant exposure would be greater than the proposed project but would remain less than significant. Alternative 2's impacts related to the risk of slope instability exacerbated by fire risk would be greater than the proposed project but would remain less than significant with mitigation incorporated.

6.3.3 Alternative 3: Mixed-Use Alternative

a. Aesthetics and Visual Resources

Alternative 3 would involve the construction of 56 multi-family residential units in the form of medium-density residential buildings as well as commercial space and a daycare space within the same development footprint as the proposed project. Alternative 3's residential units would be constructed at a taller height than the proposed project's residences as the height limitation for Alternative 3 would be increased to 35 feet, compared to a maximum building height of 25 feet applicable to the proposed project. This increased height could result in more obstruction of foothills and mountains compared to the proposed project, which would be a greater impact compared to the proposed project. Adherence to height and massing requirements enforced within the City Municipal Code would ensure the design of on-site structures would limit building height and massing in accordance with the medium-residential zone and would therefore minimize the obstruction of views of surrounding mountains and foothills. Overall, Alternative 3 would have greater impacts on scenic vistas compared to the proposed project, but impacts would remain less than significant.

The project site is not visible from a scenic highway. Like the proposed project, Alternative 3 would have no impact on scenic resources within a State scenic highway.

Both the proposed project and Alternative 3 would be designed for consistency with the development regulations of the applicable zoning district utilized for consistency evaluation pursuant to the Builder's Remedy. Therefore, Alternative 3 would have the same impact related to the potential to result in conflicts with the applicable zoning governing scenic quality (e.g., height, massing, and setback requirements, etc.) as the proposed project. Like the proposed project, impacts related to conflicts with applicable zoning governing scenic quality would be less than significant.

Given Alternative 3 would include multi-family housing and commercial uses in the same development footprint as the proposed project, Alternative 3 would introduce a greater amount of new sources of light and glare as the proposed project. As with the proposed project, construction of Alternative 3 would not occur during evening or nighttime hours in accordance with Section 17.39.070 of the City's Zoning Code and would not require nighttime lighting. Lighting installed as part of Alternative 3 would be designed in compliance with City of Goleta General Plan/Coastal Land Use Plan Policy VH 4.12 requirement for dark sky compliant lighting fixtures for exterior lighting. Alternative 3 would introduce a similar amount of potential glare compared to the proposed project including glass surfaces and car windows, which could be screened with landscaping. Overall, Alternative 3's impacts related to light and glare would be greater compared to the proposed project but would remain less than significant.

Based on the above, Alternative 3's impacts related to scenic vistas and light and glare would be greater compared to the proposed project but would remain less than significant. Like the proposed project, Alternative 3 would not result in impacts related to a State scenic highway. Alternative 3 would result in the same impacts related to conflicts with applicable zoning governing scenic quality which would be less than significant.

b. Air Quality

Based on the City's average 2.59 persons per household estimated by the DOF, the introduction of 56 residential units would result in the addition of approximately 145 new residents to Goleta (DOF 2025). Unlike the proposed project, Alternative 3 would also induce additional indirect growth from employees at the neighborhood market, workspace, and daycare. The City of Goleta General Plan/Coastal Land Use Plan Final EIR utilizes a growth rate of one job per 500 square feet of commercial floor area to estimate growth from employment (City of Goleta 2006a). Accordingly, the neighborhood market, workspace, and daycare facilities totaling 12,000 square feet could result in approximately 24 additional employees to Goleta. In a conservative scenario where all projected employees and their families were to relocate to Goleta, based on the City's average 2.59 persons per household (DOF 2025), there would be an indirect population growth of 103 residents from the commercial uses. In total, Alternative 3 could result in a population growth of 248 residents, which is 103 residents greater than the proposed project. Due to the increased population, Alternative 3 has a greater potential to conflict with growth projections used in the 2022 Ozone Plan compared to the proposed project. The SBCAG growth projections estimate that the population in Goleta would increase from 32,892 residents to 34,700 residents by 2050, an increase of 1,808 residents (SBCAG 2019). Growth of 248 residents would therefore not exceed SBCAG growth projections. Accordingly, Alternative 3's growth would be within SBCAG growth projections and therefore would not conflict with the 2022 Ozone Plan. Alternative 3's impacts related to conflicts with an air quality management plan would be greater than the proposed project but would remain less than significant.

Alternative 3 would result in an increased scope of development activities compared to the proposed project. Accordingly, Alternative 3 would have a longer construction schedule as the proposed project and would result in more overall criteria air pollutant emissions during construction compared to the

proposed project. However, given that, as with the proposed project, construction of Alternative 3 would occur in compliance with the Condition of Approval requiring the use of Tier 4 construction equipment, Alternative 3's construction would also not exceed SBCAPCD thresholds for ozone precursors. Alternative 3 would include residential and commercial uses which are not considered to be uses which produce substantia air pollutants. Alternative 3 would therefore not exceed SBCAPCD thresholds for ozone precursors or particulate matter during operation. Alternative 3's impacts related to release of criteria air pollutants would be greater compared to the proposed project but would remain less than significant.

Alternative 3 would be located on the same project footprint as the proposed project and would therefore be located same distance from sensitive receptors as the proposed project; however, Alternative 3's increased development activities would result in a greater potential to introduce substantial pollutant concentrations near sensitive receptors. As with the proposed project, construction of Alternative 3 would include the use of Tier 4 emissions standards required as a Condition of Approval which would minimize exhaust emissions from nonroad diesel engines and would occur in compliance with SBCAPCD Rule 323.1, Rule 329, and Rule 345 to minimize the amount of volatile organic compound, reactive organic compound, and fugitive dust emissions on-site during construction. Alternative 3 would consist of similar operations as the proposed project, with the addition of a neighborhood market, workspace, and daycare, each of which are not uses that would generate substantial pollutant concentrations such as manufacturing uses or factories. Alternative 3's impacts related exposure of sensitive receptors to substantial pollutant concentrations would be greater compared to the proposed project but would remain less than significant.

Alternative 3 would result in an increased scope of development activities compared to the proposed project and would therefore a greater amount similar odors during construction. These odors would be intermittent, temporary, and would dissipate rapidly with distance from in-use construction equipment. As with the proposed project, Alternative 3's residences and commercial development would not include facilities considered by SBCAPCD to have the potential to cause odor impacts. Therefore, Alternative 3's impact related to odors would be greater than the proposed project but would remain less than significant.

Overall, based on the above, Alternative 3's air quality impacts would be greater than the proposed project but would remain less than significant.

c. Biological Resources

Alternative 3 would be located on the same site and disturb the same footprint as the proposed project. As such, it would have the same potential to directly and indirectly affect special-status plant and wildlife species on-site as the proposed project. As with the proposed project, Alternative 3 would require implementation of Mitigation Measures NOI-1 and BIO-1 through BIO-6 to reduce potential impacts to special-status plant and wildlife species to a less than significant level. Alternative 3's impacts related to special-status plant and wildlife species would be similar to the proposed project and would remain less than significant with mitigation incorporated.

Alternative 3 would develop the same project footprint as the project and would therefore have the same potential to result in direct and indirect impacts to arroyo willow thicket, black sage – California sagebrush scrub, and eucalyptus grove that serves as raptor roosting habitat ESHA. As with the proposed project, Alternative 3 would require implementation of Mitigation Measures BIO-3, BIO-4, and BIO-7 to reduce potential impacts to arroyo willow thicket, black sage – California sagebrush scrub, and eucalyptus grove that serves as raptor roosting habitat ESHA to a less than significant level.

Alternative 3's impacts related to ESHA would be similar to proposed project and would remain less than significant with mitigation incorporated.

As with the proposed project, Alternative 3 would require implementation of Mitigation Measures BIO-3 and BIO-4 to reduce potential construction impacts related to the removal of riparian habitat which may be a jurisdictional resource. During operation, Alternative 3 would result in similar uses household hazardous materials or other hazardous materials such as pesticides as the proposed project, which would occur in accordance with Section 17.030.060 of the City's Municipal Code which prohibits the use of insecticides, herbicides, artificial fertilizers, or other toxic chemical substances within and adjacent to ESHA, which surrounds El Encanto Creek. Accordingly, Alternative 3's operation would result the same impacts to wetlands as the proposed project, which would remain less than significant with mitigation incorporated.

Alternative 3 would result in additional overall construction noise compared to the proposed project which could result in temporary disruption of wildlife movement. Accordingly, Alternative 3 would require implementation of Mitigation Measure NOI-1 to reduce potential impacts to wildlife movement related to construction noise to a less than significant level. Alternative 3 would introduce a greater amount of new sources of light and glare compared to the proposed project, but lighting would be installed in accordance with City of Goleta General Plan/Coastal Land Use Plan Policy VH 4.12 requirement for dark sky compliant lighting fixtures for exterior lighting which would not result in a substantial barrier to wildlife movement. Alternative 3 would result in slightly increased human presence at the project site compared to the proposed project due to the addition of a neighborhood market, workspace, and daycare; however, this increased human presence would not substantially impede wildlife movement as the project site is not designated as a wildlife corridor, and no fencing or structures would block access to the creek. Accordingly, although Alternative 3's impact on wildlife corridors and wildlife movement would be greater than the proposed project, Alternative 3's impact would remain less than significant with mitigation incorporated.

Alternative 3 would occupy the same project footprint as the proposed project and would therefore have a similar potential to conflict with City of Goleta General Plan/Coastal Land Use Plan Policies CE 1.6, CE 1.9, CE 2.3, CE 5.3, and CE 9.5, and the City's Urban Forest Management Plan. Alternative 3 would require implementation of Mitigation Measures BIO-3, BIO-4, BIO-7, and BIO-8. As with the proposed project, Alternative 3 would remain inconsistent with Policies CE 1.9 and 2.3; however, these inconsistencies are related to policy-level misalignments and the environmental impacts of development within ESHA and Streamside Protection Area buffers would be reduced to a less than significant level with implementation of the abovementioned mitigation measures, and thus would not result in a significant impact on the environment. Alternative 3's impact related to conflicts with local policies and ordinances protecting biological resources would be similar to proposed project and would remain less than significant with mitigation incorporated.

As with the proposed project, Alternative 3 would not be located in an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Alternative 3 would have no impact related to conflicts with these plans, which would be the same level of impact compared to the proposed project.

Based on the above, Alternative 3 would have a similar impact on special-status plant and wildlife species, sensitive natural communities, wetlands, and conflicts with local policies or ordinances protecting biological resources which would remain less than significant with mitigation incorporated. Alternative 3 would have a greater impact on wildlife corridors and wildlife movement, but this impact would remain less than significant with mitigation incorporated. As with the proposed project, Alternative 3 would have no impact related to conflicts with an adopted Habitat Conservation Plan,

Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan with mitigation incorporated.

d. Cultural Resources

Alternative 3 would occur within the same project footprint as the proposed project and would therefore not create a substantial adverse change in the significance of a historical resource, as no historical resources are located on-site. As with the proposed project, Alternative 3 would have no impact on historical resources.

Alternative 3 would result in an increased scope of development activities within the same project footprint. The taller residential structures may require additional excavation for deeper foundational support compared to the proposed project and would therefore have greater potential to encounter unknown archaeological resources as the proposed project. Mitigation Measures CUL-1 through CUL-3 would continue to be required which would minimize potential impacts to unanticipated discoveries of archaeological resources by requiring archaeological monitoring, a cultural resources sensitivity meeting for construction personnel, and implementation of appropriate procedures for evaluation and treatment of any discoveries made during construction. Alternative 3's impacts would be greater than the proposed project but would remain less than significant with mitigation incorporated.

Alternative 3 would result in an increased scope of development activities within the same project footprint. The taller residential structures may require additional excavation for deeper foundational support compared to the proposed project and would therefore have greater potential to encounter unknown human remains as the proposed project. As with the proposed project, in the event of unanticipated discovery of human remains, the construction contractor would comply with State of California Health and Safety Code Section 7050.5 and human remains would be preserved in accordance with the requirements of Public Resources Code Section 5097.98. Alternative 3's impacts related to human remains greater than the proposed project but would remain less than significant.

As with the proposed project, Alternative 3 would have no impact on historical resources. Alternative 3's impacts to archaeological resources would be greater than the proposed project but would remain less than significant with mitigation incorporated. Alternative 3's impacts to human remains would be greater than the proposed project but would remain less than significant.

e. Geology and Soils

Alternative 3 would be located on the same site as the proposed project. There is no Alquist-Priolo Fault Zone located on the site. Therefore, Alternative 3 would have no impact involving fault rupture, which would be the same level of impact as the proposed project.

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. As with the proposed project, Alternative 3 would implement Mitigation Measure GEO-1, which requires incorporation of geotechnical recommendations into grading and building plans. Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to groundshaking to a less than significant level through incorporation of structural integrity recommendations. Because Alternative 3 would increase the amount of and people that would be introduced on-site compared to the proposed project, Alternative 3 would increase the proposed project's impacts related to seismic ground shaking, but Alternative 3's level of impact would remain less than significant with mitigation incorporated.

Alternative 3 would be subject to the same negligible liquefaction, lateral spreading, subsidence, and collapse risks as the proposed project. As with the proposed project, Alternative 3 would require implementation of Mitigation Measure GEO-1 requiring recommendations from the project-specific geotechnical reports to be put into grading and building plans. Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to landslides on the project site to a less than significant level through incorporation of slope stability recommendations. Because Alternative 3 would increase the amount of people that would be introduced on-site compared to the proposed project, Alternative 3 would increase the proposed project's impacts related to liquefaction, lateral spreading, subsidence, and collapse risks, but Alternative 3's level of impact would remain less than significant with mitigation incorporated.

Alternative 3 would be subject to the same landslide risks as the proposed project. As with the proposed project, Alternative 3 would require implementation of Mitigation Measure GEO-1 to incorporate slope stability recommendations into grading and building plans. Because Alternative 3 would increase the amount of people that would be introduced on-site compared to the proposed project, Alternative 3 would increase the proposed project's impacts related to landslides, but Alternative 3's level of impact would remain less than significant with mitigation incorporated.

Alternative 3 would result in an increased scope of development activities within the same project footprint as the proposed project and would therefore have increased potential for erosion of on-site soils. As with the proposed project, Alternative 3's construction activities must obtain coverage from the Construction Stormwater General Permit which would require implementation of a Stormwater Pollution Prevention Plan and BMPs for erosion control. As with the proposed project, Alternative 3 would include implementation of stormwater infrastructure to treat and discharge stormwater consistent with the requirements of the Central Coast Regional Water Quality Control Board, including erosion control, during operation. As with the proposed project, Alternative 3 would not substantially increase the rate of runoff on the site compared to existing conditions with installation of stormwater control infrastructure. Alternative 3's impact would be greater compared to the proposed project but would remain less than significant.

As with the proposed project, Alternative 3 would locate development on soil with high to critical expansion potential of soils. The construction contractor would be required to comply with the California Building Code, including the use of non-expansive fill material, to minimize the potential for structural hazards associated with soil expansion. As with the proposed project, Alternative 3 would require implementation of Mitigation Measure GEO-1 requiring recommendations from the project-specific geotechnical reports to be put into grading and building plans. Implementation of Mitigation Measure GEO-1 would reduce potential impacts due to expansive soils on the project site to a less than significant level through incorporation of structural integrity recommendations into the project, which would ultimately minimize the potential for expansive soils to result in risks to life or property. Because Alternative 3 would increase the amount of people that would be introduced on-site compared to the proposed project, Alternative 3 would increase the proposed project's impacts related to expansive soil, but Alternative 3's level of impact would remain less than significant with mitigation incorporated.

Alternative 3 would not involve the use of septic tanks or alternative wastewater disposal systems. Alternative 3 would result in no impact, which would be the same level of impact as the proposed project.

Alternative 3 would result in an increased scope of development activities within the same project footprint as the proposed project. The taller residential structures may require additional excavation for deeper foundational support compared to the proposed project and would therefore have greater

potential to encounter unknown paleontological resources. Alternative 3 would require the implementation of Mitigation Measure GEO-2 to reduce potential construction impacts to paleontological resources and unique geologic features to a less than significant level by requiring a Worker Environmental Awareness Program training, monitoring, and setting forth procedures for the recovery, identification, and curation of fossils discovered during construction. Alternative 3's impacts related to paleontological resources and unique geologic features would be greater compared to the proposed project and would remain less than significant with mitigation incorporated.

Based on the above, Alternative 3's would have no impact related to earthquake faults and septic tanks, the same as the proposed project. Alternative 3's impacts related to liquefaction, lateral spreading, subsidence, collapse, and erosion would be increased compared to the proposed project but would remain less than significant. Alternative 3's impacts related to groundshaking, landslides, expansive soil, and paleontological resources would be increased compared to the proposed project but would remain less than significant with mitigation incorporated.

f. Greenhouse Gas Emissions

Alternative 3 would result in an increased scope of development activities and longer construction schedule compared to the proposed project and would therefore emit a greater amount of GHG emissions during construction compared to the proposed project. Alternative 3's multi-family residential development would produce less GHG emissions during operation compared to the proposed project due to the decrease in energy required for heating, cooling, and lighting more compact residences compared to the proposed project's single-family residences (United States Energy Information Administration 2013). In addition, Alternative 3 would include a neighborhood market, workspace, and daycare as mixed-use space, encouraging residents to use on-site amenities which would minimize GHG emissions from vehicle trips. Given Alternative 3's reduction in operational GHG emissions compared to the proposed project, Alternative 3's impacts related to GHG emission would be reduced compared to the proposed project but would remain less than significant.

As with the proposed project, Alternative 3 would include design features to promote renewable energy use, energy efficiency, water efficiency, and reductions in vehicle travel, all of which contribute to the creation of minimal GHG emissions. Alternative 3 would include mixed-use development and affordable housing in compliance with SBCAG 2050 Regional Transportation Plan/Sustainable Community Strategy policies. In addition, Alternative 3 would incorporate water efficient fixtures in residences and the neighborhood market, workspace, and daycare to reduce water consumption for landscaping, plumbing, and irrigation consistent with the latest Title 24 Green Building Code and Building Energy Efficiency Standards. Alternative 3 would place residential development and commercial development within proximity to existing transit and bicycle facilities on Cathedral Oaks Road, encouraging bicycling as an alternative form of transportation. Alternative 3 would include the continuation of the existing Class I trail that extends east of the project site and runs parallel to Cathedral Oaks Road, consistent with the City's bikeways plan map. Alternative 3's buildings would not utilize natural gas and would be constructed in accordance with the energy reduction standards set forth in CALGreen and the Building Energy Efficiency Standards. Accordingly, Alternative 3 would be consistent with applicable GHG reduction plans. Therefore, Alternative 3's impact related to conflicts with GHG reduction plans would be similar to the proposed project and would remain less than significant.

Based on the above, Alternative 3's GHG emissions impacts would be reduced compared to the proposed project due to the implementation of mixed-use development on the project site.

Alternative 3's impacts related to conflicts with GHG reduction plans should be similar to the proposed project and would remain less than significant.

g. Hazards and Hazardous Materials

Alternative 3 would result in an increased scope of development activities within and would therefore require use of a greater amount of hazardous materials during construction. Hazardous materials used during construction of Alternative 3 would be handled in accordance with the same regulations as the proposed project, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Waste Control Law, and California Code of Regulations Title 22. These regulations prescribe measures for the safe transport, use, storage, and disposal of hazardous materials to reduce risk of spills. Construction of Alternative 3 would also occur in compliance with a Storm Water Pollution Prevention Plan to reduce potential spills. Any use of household hazardous materials or other hazardous materials such as pesticides during operation would occur in compliance with existing hazardous materials regulations established by United States Environmental Protection Agency and the State of California. Accordingly, Alternative 3's impact related to the routine transport, use, and disposal of hazardous materials would be greater than the proposed project but would remain less than significant.

As with the proposed project, Alternative 3 would include demolition of the existing on-site residence, garage, and barn, which have the potential to contain ACM and LBP. Alternative 3 would result in the same potential impact regarding the release of ACM and LBP from demolition of existing buildings. However, Alternative 3 would result in an increased scope of development activities within and would therefore require use of a greater amount of hazardous materials during construction. Mitigation Measures HAZ-1 and HAZ-2 would continue to be required, which would reduce potential hazardous material impacts associated with accidental releases of hazardous materials during demolition to a less than significant level. Alternative 3 would result in more structures on-site and therefore greater potential for radon exposure; however, as with the proposed project, in accordance with Goleta General Plan/Coastal Land Use Plan Policy SE 1.9, radon testing would be required and, if on-site radon levels exceed the United States Environmental Protection Agency recommended threshold, as a Condition of Approval, the City would require the design of homes to comply with the standards for reducing radon in single-family residences implemented by the American Association of Radon Scientists and Technologists and American National Standards Institute. Operation of Alternative 3 would involve minimal transport, use, and disposal of hazardous materials similar to the proposed project. Given the increased scope of development activities during construction, Alternative 3's impact related to the accidental release of hazardous materials would be greater than the proposed project but would remain less than significant with mitigation incorporated.

Construction of Alternative 3 would occur the same distance from South Coast Montessori as the proposed project. However, Alternative 3 would result in an increased scope of development activities within and would therefore require use of a greater amount of hazardous materials during construction. Alternative 3's construction activities would have the potential to create a significant hazard involving the release of hazardous materials into the environment, which would be reduced with implementation of Mitigation Measures HAZ-1 and HAZ-2. Alternative 3's impact related to handling hazardous materials within 0.25-mile of a school would be greater than the proposed project and would remain less than significant with mitigation incorporated.

Alternative 3 would be located on the same site as the proposed project which is not located on a site listed pursuant to Government Code Section 65962.5. No impact would occur related to listed hazardous materials sites, which would be the same level of impact as the proposed project.

Alternative 3 would be located on the same site as the proposed project which is not located within the noise or safety contours of the Santa Barbara Airport. No impact related to excessive noise or safety hazards due to proximity to an airport would occur, which would be the same level of impact as the proposed project.

Alternative 3 would include construction within Cathedral Oaks Road for utility installation and therefore would have similar potential to interfere with emergency response or evacuation of Cathedral Oaks Road during construction as the proposed project, which would be minimized with implementation of a Construction Traffic Management Plan. As with the proposed project, Alternative 3's operations would not introduce activities that could impede or interfere with the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan or emergency evacuations on Cathedral Oaks Road. Alternative 3's impact related to impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan would be similar to the proposed project and would remain less than significant.

Alternative 3 would be located within the same fire hazard severity zones as the proposed project and therefore be exposed to the same fire risks as the proposed project. However, because Alternative 3 would result in more development compared to the proposed project, Alternative 3 would have greater potential to exacerbate fire risk during construction. As with the proposed project, construction of Alternative 3 would not include unique activities that could exacerbate fire risk, such as storage of high quantities of flammable liquids and fuels. Construction would occur in compliance with California Public Resources Code Sections 4442, 4427, 4428, and 4431, and California Fire Code Section 3312 to minimize the potential for wildland fire. Alternative 3's structures would result in similar fire risks as the proposed project, which would be minimized with adherence to the standards in the California Fire Code, California Building Code, and California Code of Regulations Title 14. As with the proposed project, Alternative 3 would include a Construction Traffic Management Plan which would minimize disruptions to Cathedral Oaks Road, including in the event of emergency evacuation. Therefore, Alternative 3's impact related to wildland fire would be greater than the proposed project but would remain less than significant.

Based on the above, Alternative 3's impacts related to the transport, use, and disposal of hazardous materials would be greater than the proposed project but would remain less than significant. Alternative 3' impact related to upset or accident of hazardous materials and emissions of hazardous materials near schools would be greater than the proposed project but would remain less than significant with mitigation incorporated. Impacts related to emergency response plans would be similar to the proposed project but would remain less than significant. Impacts related to wildland fires would be greater than the proposed project but would remain less than significant. Like the proposed project, no impacts related to hazardous materials sites or airport hazards would occur.

h. Hydrology and Water Quality

Alternative 3 would result in an increased scope of development activities within the same project footprint as the proposed project and would therefore have increased potential to degrade water quality compared to the proposed project. As with the proposed project, Alternative 3 would include demolition of the existing on-site residence, garage, and barn which could discharge ACB and LBP to on-site soils where they could be transported off-site in stormwater runoff. Mitigation Measures HAZ-1 and HAZ-2 would be required and would minimize the potential for the accidental release of ACB and LBP. Construction of Alternative 3 would comply with the Construction Stormwater General Permit, including the implementation of a Storm Water Pollution Prevention Plan and BMPs to minimize the introduction of pollutants during construction activities. In addition, adherence to the

City's Municipal Code would ensure construction activities would minimize substantial runoff water. Alternative 3's construction impacts related to water quality degradation, erosion, and the introduction of substantial polluted runoff and exceedances of stormwater capacity would be increased compared to the proposed project but would remain less than significant with mitigation incorporated.

Alternative 3 would be required to include stormwater infrastructure to treat and discharge stormwater consistent with the requirements of the Central Coast Central Coast Regional Water Quality Control Board during operation which would ensure construction activities would minimize substantial runoff water post-construction and adequately treat stormwater prior to discharge in El Encanto Creek or the City's storm drain system. As with the proposed project, Alternative 3 would not substantially increase the rate of runoff on the site compared to existing conditions with installation of stormwater control infrastructure. Alternative 3's operational impacts related to water quality degradation, erosion, and the introduction of substantial polluted runoff and exceedances of stormwater capacity would be similar to the proposed project and would remain less than significant.

Alternative 3 would occur on the same site as the proposed project which has limited infiltration potential and would include as similar amount of impervious surfaces as the proposed project within the same development footprint. Based on the site's limited infiltration potential, Alternative 3 would not substantially decrease groundwater infiltration rates on-site or result in substantial interference to groundwater recharge. As with the proposed project, Alternative 3 would be subject to GWD review prior to issuance of a Can and Will Serve Letter which would ensure that Alternative 3 could receive water from GWD, which supplies water partially from the Goleta Groundwater Basin. Alternative 3 would be subject to the same GWD regulatory measures as the proposed project requiring water conservation during times of drought. As described in the *Utilities and Service Systems* discussion below, Alternative 3 would result in the same water demand as the proposed project. Alternative 3's impact related to substantially decreasing groundwater supplies or interfering with groundwater recharge would be similar to the proposed project and would remain less than significant.

As with the proposed project, Alternative 3's stormwater infrastructure would be sized to collect and detain stormwater and release it at a controlled rate to ensure discharge runoff rates would not exceed existing conditions for the 100-year flood event consistent with the requirements of the Central Coast Central Coast Regional Water Quality Control Board. The project site is not located within a flood hazard zone and Alternative 3 would therefore not place structures in a floodplain in a manner that could increase flooding. Alternative 3's impact related to on- or off-site flooding would be similar to the proposed project and would remain less than significant.

Alternative 3 would occur on the same site as the proposed project and therefore would be located outside of a flood hazard zone. As with the proposed project, Alternative 3's stormwater infrastructure would discharge stormwater flows from the site so they would not increase compared existing conditions, the proposed project would not alter off-site flooding or drainage. Like the proposed project, no impact related to impeded or redirected flood flows would occur.

Alternative 3 would occur on the same site as the proposed project and therefore would be located outside of a flood hazard zone, tsunami inundation zone, and seiche zone and therefore would not risk pollutant release due to inundation within these zones. Like the proposed project, no impact would occur.

Given the increased scope of development activities within the same project footprint as the proposed project, Alternative 3 would have increased potential to conflict with the *Basin Plan* compared to the proposed project. As with the proposed project, Alternative 3 would adhere to the requirements of the Construction Stormwater General Permit, and Chapter 13.04 and Chapter 15.09 of the City's Municipal Code to minimize water quality impacts, and would require Mitigation Measures HAZ-1, and HAZ-2, to reduce potential water quality impacts to a less than significant level. Accordingly, Alternative 3's impacts related to conflicts with the *Basin Plan* would be increased compared to the proposed project but would remain less than significant with mitigation incorporated.

As described above, Alternative 3 would not adversely impact groundwater supplies. As described in the *Utilities and Service Systems* discussion below, Alternative 3 would result in the same water demand as the proposed project. Accordingly, Alternative 3 would not interfere with the management of the Basin in accordance with the Wright Judgement. Alternative 3's impact related to conflicts with the Wright Judgement or GWD's *Groundwater Management Plan* would be similar to the proposed project and would remain less than significant.

Based on the above, Alternative 3's impacts related to water quality, polluted runoff, erosion, and conflict with water quality plans or groundwater management plans would be increased compared to the proposed project but would remain less than significant with mitigation incorporated. Impacts related to groundwater would be similar to the proposed project and would remain less than significant. Alternative 3's impact related to on- or off-site flooding would be similar to the proposed project and would remain less than significant. As with the proposed project, no impacts related to flood hazard zones and release of pollutants from inundation would occur.

i. Land Use and Planning

As with the proposed project, Alternative 3 would not divide an established community because Alternative 3 would include development on an underutilized parcel in Goleta and would not include any components such as new roads or highways which would divide existing communities. Alternative 3's impact related to the physical division of an established community would be the same as the proposed project and would remain less than significant.

As with the proposed project, Alternative 3 would be consistent with the City's zoning standards in accordance with the Builder's Remedy and California Density Bonus Law. Given that Alternative 3 would occur within the same project footprint as the proposed project, Alternative 3 would have similar potential to be inconsistent with City of Goleta General Plan/Coastal Land Use Plan Policy CE 1.6, CE 1.9, CE 2.3, CE 5.3, and CE 9.5. As with the proposed project, Alternative 3 would be designed to be consistent with Policy CE 2.2 regarding encroachment into the Streamside Protection Area buffer. As with the proposed project, Alternative 3 would include implementation Mitigation Measures BIO-1 through BIO-8. Additionally, implementation of Mitigation Measures CUL-1 through CUL-3, GEO-1, GEO-2, HAZ-1, HAZ-2, and NOI-1 would ensure Alternative 3's consistency with other applicable City of Goleta General Plan/Coastal Land Use Plan policies, similar to the proposed project. Alternative 3's impact related to land use plans and policies would be similar to the proposed project and would remain less than significant with mitigation incorporated.

Alternative 3's impact on the physical division of an established community would be the same as the proposed project and would remain less than significant. Alternative 3's impact related to land use plans and policies would be similar to the proposed project and would remain less than significant with mitigation incorporated.

j. Noise

Alternative 3 would result in an increased scope of development activities within the same project footprint as the proposed project and therefore would result in increased overall construction noise at nearby sensitive receptors as the proposed project. Alternative 3 would also require implementation of Mitigation Measure NOI-1 to ensure construction noise levels do not exceed 65 dBA construction noise standards. Accordingly, Alternative 3's construction noise impact would be greater than proposed project but would remain less than significant with mitigation incorporated.

Alternative 3 would include additional use of heating, ventilation, and air conditioning units compared to the proposed project associated with the neighborhood market, workspace, and daycare. However, as with the proposed project, operational noise associated with these units would not exceed City noise thresholds because a typical HVAC unit generates a noise level of 68 A-weighted decibels at 3.28 feet (Carrier 2007). This noise level would attenuate to 38 A-weighted decibels at a distance of 100 feet, which is the distance to the nearest residences, with no obstructions or barriers to the noise. This distance is below the City's 65 A-weighted decibels community noise equivalent level threshold. Accordingly, Alternative 3's stationary operational noise impact would be greater compared to the proposed project but would remain less than significant.

Alternative 3 could increase vehicle trips on-site compared to the proposed project as Alternative 3 would include mixed-use facilities that residents within Goleta could utilize. Typically, a doubling of traffic volumes is required to result in a noticeable increase in traffic noise. Average daily trips along Cathedral Oaks Road in the vicinity of the project site is approximately 8,900 (Appendix J). Given the small-scale nature of the mixed-use facilities totaling 12,000 square feet, Alternative 3's mixed use facilities would not generate double the existing trips required to increase traffic noise to a noticeable level. Alternative 3's operational traffic noise impact would be increased compared to the proposed project but would remain less than significant.

Alternative 3 would result in an increased scope of development activities, including additional excavation for deeper building foundations, compared to the proposed which would result in an overall increased duration of groundborne vibration during construction; however, Alternative 3 the same distance to vibration sensitive receptors as the proposed project, and construction equipment required for Alternative 3 is anticipated to be similar to the type of equipment required for the proposed project which would not generate substantial groundborne vibration. Accordingly, vibration levels would not exceed the Federal Transit Administration's groundborne vibration threshold. As with the proposed project, Alternative 3's operational activities would not include railroads or subways or other projects known to generate excessive groundborne vibration. Alternative 3's groundborne vibration impacts would be similar to the proposed project and would remain less than significant.

As with the proposed project, Alternative 3 would be located outside of the noise contours of the Santa Barbara Airport. As with the proposed project, Alternative 3 would have no impact related to excessive airport noise.

Based on the above, Alternative 3's construction noise impacts would be greater compared to the proposed project but remain less than significant with mitigation incorporated. Alternative 3's operational noise and construction groundborne vibration impacts would be greater compared to the proposed project but would remain less than significant. Like the proposed project, Alternative 3 would have no impact related to airport noise.

k. Transportation and Circulation

As with the proposed project, Alternative 3 would not include elements that would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Alternative 3 would add the same extension of the Class I trail consistent with Policy TE 1.1. Alternative 3 would incorporate the same amount of affordable housing and bicycle facilities as the proposed project and would encourage active and alternative transportation to a greater extent than the proposed project because Alternative 3 would include mixed-use development (i.e., neighborhood market, workspace, and daycare) that could be accessed by residents by walking or biking. As with the proposed project, Alternative 3's proposed driveways would be subject to review and approval by the City and SBCFD which would minimize the potential for vehicle to pedestrian and vehicle to cyclist conflicts. As with the proposed project, Alternative 3 would result in temporary lane, bicycle route, or sidewalk closures on Cathedral Oaks Road for utility installation, the impacts of which would be minimized with implementation of a Construction Traffic Management Plan. Accordingly, Alternative 3's impacts related to conflicts with transit, roadway, bicycle, and pedestrian facilities would be similar to the proposed project and would remain less than significant.

Alternative 3 would require greater construction activities compared to proposed project and therefore would generate similar short-term VMT increases as the proposed project. This construction-related VMT increase would be temporary and would not have a lasting effect on the overall transportation network or long-term VMT patterns in the area. Alternative 3 would occur on the same project site as the proposed project. The City's adopted Resolution 20-44 is utilized to assess potential impacts related to VMT. As Alternative 3 would be a mixed-use project, each component (i.e., commercial and residential) is evaluated separately consistent with the guidance for mixed-use projects in Resolution 20-44. The City has identified areas where operation of a work-based project would be presumed to have a less than significant impact on increases in VMT. The project site is within the work-based screening area; therefore, Alternative 3's commercial component would be presumed to have a less than significant impact related to VMT. Given that Alternative 3 would include neighborhood market, workspace, and daycare on the same project site as residential uses, Alternative 3's per resident VMT generation is anticipated to be less than the proposed project because residents would not have to travel as far to reach these commercial destinations. Accordingly, Alternative 3 would result in a lower per resident VMT compared to the project, but it may still exceed the City thresholds even after the implementation of Mitigation Measure TRA-1. Therefore, Alternative 3's impact related to conflicts with *CEQA Guidelines* Section 15064.3(b) would be less than the proposed project but would remain significant and unavoidable.

As with the proposed project, Alternative 3 would include access points on Cathedral Oaks Road that would be aligned with Royal Linda Drive and King Daniel Lane and would be designed to provide clear visibility and minimize potential offset intersection conflicts. in accordance with SBCFD and City requirements. Alternative 3's circulation design would be subject to review and approval from SBCFD and the City which would minimize potential for transportation design hazards. Alternative 3 would not present new conflicts with incompatible uses, and Alternative 3 would incorporate sidewalks and frontage improvements, including the same continuation of the Class I trail parallel to Cathedral Oaks Road, which would result in the same enhancements to pedestrian and bicycle safety. Accordingly, Alternative 3's impacts to increased hazards would be similar to the proposed project and would remain less than significant.

As with the proposed project, Alternative 3's construction equipment staging and worker parking would occur entirely on-site which would minimize the potential for construction related vehicles and equipment to result in inadequate emergency access. Alternative 3 would also include implementation of the same Construction Traffic Management Plan as a Condition of Approval to minimize disruptions on Cathedral Oaks Road. As with the proposed project, Alternative 3 would be designed in accordance with all applicable SBCFD standards to maintain adequate emergency access. As with the proposed project, SBCFD and the City would review and approve Alternative 3's design, which would ensure Alternative 3 would provide adequate egress for emergency access. Therefore, Alternative 3's impacts to emergency access would be similar to the proposed project and would remain less than significant.

Based on the above, Alternative 3's impacts related to conflicts with transit, roadway, bicycle, and pedestrian facilities would be similar to the proposed project and would remain less than significant. Alternative 3 would result a lesser impact related to VMT compared to the proposed project which would remain significant and unavoidable. Alternative 3 would result in similar impacts as the proposed project related to transportation hazards and emergency access which would remain less than significant.

l. Tribal Cultural Resources

Alternative 3 would result in an increased scope of development activities within the same project footprint as the proposed project. The taller residential structures may require additional excavation for deeper foundational support compared to the proposed project and would therefore have greater potential to result in impacts to unknown tribal cultural resources. As with the proposed project, Mitigation Measures CUL-1 through CUL-3 would be required to reduce potential impacts to tribal cultural resources of Native American origin by requiring construction monitoring and procedures and final disposition of any unanticipated discoveries of such resources. Alternative 3's impact related to tribal cultural resources would be the same as the proposed project and remain less than significant with mitigation incorporated.

Alternative 3's impact related to tribal cultural resources would be increased compared to the proposed project but would remain less than significant with mitigation incorporated.

m. Utilities and Service Systems

Given Alternative 3's increased development, Alternative 3 would require the installation of additional utility infrastructure compared to the proposed project for the additional mixed-use buildings. As described below, Alternative 3 would not necessitate additional water supply, wastewater facilities, or solid waste facilities. As with the proposed project, Alternative 3 could be adequately served with the existing electricity supplies provided by Southern California Edison or Central Coast Community Energy. Alternative 3 would include stormwater infrastructure in compliance with Central Coast Regional Water Quality Control Board requirements, thereby adequately controlling the flow of stormwater such that additional infrastructure would not be required. Accordingly, Alternative 3's utility development would not necessitate the construction or relocation of additional utility infrastructure Accordingly, Alternative 3's impact related to the relocation or construction of utility infrastructure would be greater than the proposed project but would remain less than significant.

Based on the water demand rate of 0.22 AFY per medium-density residential residence from the County's 2024 *Environmental Thresholds and Guidelines Manual* water demand rate, Alternative 3's residences would result in an annual water demand of approximately 12.3 AFY.[3] In addition, Alternative 3 would include a neighborhood market, workspace, and daycare which, based on a water demand rate of 0.23 AFY per 1,000 square feet of commercial space from the County's 2024 *Environmental Thresholds and Guidelines Manual*, Alternative 3's water demand from the neighborhood market, workspace, and daycare would be approximately 2.8 AFY. Thus, Alternative 3's total water demand would be 15.1 AFY, which would be the same as the proposed project. Accordingly, Alternative 3 would not generate water demand exceeding GWD's projected supplies, the same as the proposed project. Alternative 3's impact on water supply would be the same as the proposed project and would remain less than significant.

Alternative 3's wastewater generation for the residences would be 0.01, the same as the proposed project; however, Alternative 3 would include additional wastewater generation from the neighborhood market, workspace, and daycare. This wastewater generation is calculated consistent with the wastewater generation factor of 100 gallons per day per 1,000 square feet of habitable space for commercial and industrial development used in the City of Goleta's General Plan/Coastal Land Use Plan Final EIR (City of Goleta 2006b). Accordingly, wastewater generation from the neighborhood market, workspace, and daycare would be 1,200 gallons, or 0.001 MGD. The total wastewater generation from Alternative 3 would be approximately 0.011 MGD. Although Alternative 3's wastewater demand would result in a slight increase compared to the proposed project, Alternative 3's wastewater generation would be within the 0.93 MGD capacity of the wastewater treatment plant available to Goleta West Sanitary District customers. Therefore, Alternative 3's impacts related to wastewater treatment capacity would be greater than the proposed project but would remain less than significant.

Alternative 3 would involve demolition of the same structures as the proposed project and therefore would result in the same solid waste generation from demolition as the proposed project, which would be 194 tons of debris. Alternative 3 would result in an increased scope of development activities compared to the proposed project and therefore would result in an increased amount of construction solid waste generation as the proposed project. For the purposes of this analysis, it is assumed the proposed project's residential development would have a similar total floor area as the proposed project (163,920 square feet) and would include an additional 12,000 square feet of commercial space. Based on a solid waste generation factor of 4.38 pounds per square foot for construction, construction of Alternative 3 would result in 385 tons of debris, approximately 27 tons greater than the proposed project. Alternative 3's demolition and construction activities would generate a total of 579 tons of debris which, with a 65 percent demolition and construction waste recycling required by CalGreen Title 21 Part 11 Section 4.408.1 and Chapter 8.10 of the Goleta Municipal Code, would be reduced to 203 tons which would not exceed the City's project specific demolition and construction threshold of 350 tons. During operation, Alternative 3's residences would result in the same gross solid waste generation rate of 138 tons per year for the residences as the proposed project. However, based on a waste generation factor of the total square footage of these facilities multiplied by 0.0057, consistent with the County's 2024 *Environmental Thresholds and Guidelines Manual*, Alternative 3 would include an additional 68 gross tons of solid waste per year from operation of the neighborhood market, workspace, and daycare. Alternative 3's total gross solid

[3] The County's *Environmental Thresholds and Guidelines Manual* provides a lower water demand rate for medium-density residential compared to single-family residential. This decreased water demand rate is attributed to several factors, including that multi-family residences tend to be smaller than single-family residences, multi-family residences would not have individual lawns for each residence that require water, etc. (Kiefer and Krentz 2018).

waste generation would be 206 tons per year, which, with a 50 percent diversion rate, would be reduced to 103 tons per year. This amount of solid waste is greater than the proposed project but does not exceed the City's project-specific threshold of 196 tons per year. Therefore, Alternative 3's impacts related to solid waste would be greater than the proposed project but would remain less than significant.

Based on the above, Alternative 3's impacts on water supply would be the same as the proposed project and would remain less than significant. Alternative 3's impacts on utility infrastructure, wastewater generation, and solid waste would be greater than the proposed project but would remain less than significant.

n. Wildfire

Alternative 3 would be located on the same project site and would therefore be located in the same high and very high fire hazard severity zones as the proposed project. Alternative 3 would include construction within Cathedral Oaks Road for utility installation and therefore would have similar potential to interfere with emergency response or evacuation of Cathedral Oaks Road as the proposed project, which would be minimized with implementation of a Construction Traffic Management Plan. As with the proposed project, Alternative 3's operations would not introduce activities that could impede or interfere with emergency evacuations on Cathedral Oaks Road. Alternative 3's impact related to impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan would be similar to the proposed project and would remain less than significant.

Alternative 3 would result in an increased scope of development activities within the same project footprint as the proposed project and therefore would result in increased fire risk during construction compared to the proposed project. As with the proposed project, construction of Alternative 3 would be carried out in accordance with CFC Chapter 9, Section 3312 to require a water supply system on-site prior to the start of construction. Alternative 3's structures would be designed in accordance with applicable CFC, California Building Code, California Residential Code, and City General Plan/Coastal Land Use Plan requirements for fire safety. As with the proposed project, Alternative 3 would be subject to review by SBCFD to ensure the proposed project design adheres to SBCFD development standards for adequate ingress and egress, fire hydrant spacing and water flow to the site, installation of a stored water protection system on-site, adequate fire sprinkler systems, and defensible space. Alternative 3's impact related to fire risk or pollutants from wildfire would be greater than the proposed project but would remain less than significant.

Alternative 3 would require the installation of additional utility infrastructure on the project site compared to the proposed project which could result in additional fire risk. However, this utility infrastructure would be underground similar to the proposed project which would minimize fire risk. As with the proposed project, Alternative 3 would maintain a maximum 100-foot buffer zone near the riparian area on the southwestern border of the project site to further reduce spread of wildfire to adjacent land. Alternative 3 would occur in compliance with the defensible space requirement set forth in the SBCFD development standards, Chapter 49 of the CFC, and Section 51182 of the California Government Code to minimize fire risk. Accordingly, Alternative 3's impact related to infrastructure that could result in fire risk would be greater than the proposed project but would remain less than significant.

Alternative 3 would introduce a greater amount of development to the project site compared to the proposed project, thereby resulting in an increased risk related to landslides and erosion compared to the proposed project. Alternative 3 would include construction site BMPs to minimize erosion

during construction activities in accordance with the Storm Water Pollution Prevention Plan and Chapter 15.09 of the City's Municipal Code. As with the proposed project, construction would implement measures such as the use of spark arresters on equipment or the halting of hot work during times when fire risk is high to minimize fire risk. As with the proposed project, Alternative 3 would include implementation of Mitigation Measure GEO-1 to minimize geotechnical risks associated with slope instability during construction and operation. Accordingly, Alternative 3's impacts related to the risk of slope instability exacerbated by fire risk would be greater than the proposed project but would remain less than significant with mitigation incorporated.

Based on the above, Alternative 3 would have similar impacts related to emergency evacuation and response as the proposed project, which would remain less than significant. Alternative 3's impacts related to fire risk and pollutant exposure and utility infrastructure installation would be greater than the proposed project but would remain less than significant. Alternative 3's impacts related to the risk of slope instability exacerbated by fire risk would be greater than the proposed project but would remain less than significant with mitigation incorporated.

6.4 Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative among the alternatives evaluated in an EIR. *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 or minimizes environmental impacts. In some cases, an alternative will avoid or minimize one or more impacts identified for the proposed project but then introduce one or more new 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 6-2). 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.

The No Project Alternative (Alternative 1) would result in the fewest adverse environmental effects when compared to the proposed project because no development activities would occur and therefore no environmental impacts would occur compared to existing condition. Therefore, Alternative 1 would be considered environmentally superior. However, Alternative 1 would not fulfill any project objectives listed in 6.1, *Introduction*.

As stated above, *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 considered is Alternative 2 (By-Right Development) because this alternative would result in a less than significant VMT impact, compared to significant and unavoidable for the proposed project. Alternative 2 would have less potential than the proposed project to result in impacts related to aesthetics (scenic vistas, scenic quality, and light and glare), biological resources (special-status

species, riparian habitat, jurisdictional features, and conflicts with local policies), cultural resources (archaeological resources and human remains), geology and soils, hazards and hazardous materials (emergency response and evacuation), land use and planning (conflicts with land use plans), transportation (VMT and emergency access), tribal cultural resources, utilities and service systems (utility infrastructure installation and wastewater), and wildfire.. However, as Alternative 2 would include fewer residential units compared to the proposed project and would not include active transportation improvements, it would fail to meet the following project objectives:

- Develop up to 56 residential units on underutilized land located within Goleta.
- Provide housing opportunities for extremely low income, lower income, and moderate income-level persons to support the City in complying with its Regional Housing Needs Allocation requirements.
- Improve accessibility and encourage active transportation for bicycles and pedestrians in Goleta.

In addition, Alternative 2 would only partially meet the following project objective as Alternative 2 would only include one residential unit with the remaining 12 units restricted to farmworker housing:

- Provide residential development in Goleta to fulfill the housing stock envisioned in the City's adopted 2023-2031 Housing Element.

Compared to the proposed project, Alternative 3 (Mixed-Use Alternative) would result in increased impacts related to aesthetics (scenic vistas and light and glare), air quality, biological resource (wildlife movement), cultural resources (archaeological resources and human remains), geology and soils, hazards and hazardous materials (transport, use, and disposal and upset of hazardous materials and wildland fire), hydrology and water quality (degradation of water quality and conflicts with the *Basin Plan*), noise (construction and operational noise and construction groundborne vibration), tribal cultural resources, utilities and service systems (new or expanded utility infrastructure, wastewater generation, and solid waste generation). However, Alternative 3 would not increase the impact conclusions of any of these environmental topics or result in any new significant and unavoidable impacts compared to the proposed project. Alternative 3 would result in similar, or slightly reduced, impacts to all other issue areas compared to the proposed project. Alternative 3 would meet all of the project objectives listed in 6.1, *Introduction*.

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Table 6-2 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative (No Build)	Alternative 2: No Project Alternative (By-Right Development)	Alternative 3: Mixed Use Alternative
Aesthetics				
Scenic vistas	Less than significant	No impact (+)	Less than significant (+)	Less than significant (-)
Scenic highways	No impact	No impact (=)	No impact (=)	No impact (=)
Scenic quality	Less than significant	No impact (+)	Less than significant (+)	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 implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, and NOI-1	No impact (+)	Less than significant with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, and NOI-1 (+)	Less than significant with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, and NOI-1 (=)
Effects on riparian habitat or sensitive natural communities	Less than significant with implementation of Mitigation Measures BIO-3, BIO-4, and BIO-7	No impact (+)	Less than significant with implementation of Mitigation Measures BIO-3, BIO-4, and BIO-7 (+)	Less than significant with implementation of Mitigation Measures BIO-3, BIO-4, and BIO-7 (=)
Effects on state- or federally-protected wetlands	Less than significant with implementation of Mitigation Measures BIO-3 and BIO-4	No impact (+)	Less than significant with implementation of Mitigation Measures BIO-3 and BIO-4 (+)	Less than significant with implementation of Mitigation Measures BIO-3 and BIO-4 (=)
Wildlife movement	Less than significant with implementation of Mitigation Measure NOI-1	No impact (+)	Less than significant with implementation of Mitigation Measure NOI-1 (-)	Less than significant with implementation of Mitigation Measure NOI-1 (-)
Conflicts with local policies protecting biological resources	Less than significant with implementation of Mitigation Measures BIO-3, BIO-4, BIO-7, and BIO-8	No impact (+)	Less than significant with implementation of Mitigation Measures BIO-3, BIO-4, BIO-7, and BIO-8 (+)	Less than significant with implementation of Mitigation Measures BIO-3, BIO-4, BIO-7, and BIO-8 (=)
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 with implementation of Mitigation Measures CUL-1, CUL-2, and CUL-3	No impact (+)	Less than significant with implementation of Mitigation Measures CUL-1, CUL-2, and CUL-3 (+)	Less than significant with implementation of Mitigation Measures CUL-1, CUL-2, and CUL-3 (-)
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 (No Build)	Alternative 2: No Project Alternative (By-Right Development)	Alternative 3: Mixed Use Alternative
Geology and Soils				
Alquist-Priolo earthquake fault zones	No impact	No impact (=)	No impact (=)	No impact (=)
Seismic ground shaking	Less than significant with implementation of Mitigation Measure GEO-1	No impact (+)	Less than significant with implementation of Mitigation Measure GEO-1 (+)	Less than significant with implementation of Mitigation Measure GEO-1 (-)
Liquefaction and Unstable soils	Less than significant	No impact (+)	Less than significant (+)	Less than significant with implementation of Mitigation Measure GEO-1 (-)
Landslides	Less than significant with implementation of Mitigation Measure GEO-1	No impact (+)	Less than significant with implementation of Mitigation Measure GEO-1 (+)	Less than significant with implementation of Mitigation Measure GEO-1 (-)
Substantial erosion and loss of topsoil	Less than significant	No impact (+)	Less than significant (-)	Less than significant (-)
Expansive soils	Less than significant with implementation of Mitigation Measure GEO-1	No impact (+)	Less than significant with implementation of Mitigation Measure GEO-1 (+)	Less than significant with implementation of Mitigation Measure GEO-1 (-)
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 with implementation of Mitigation Measure GEO-2	No impact (+)	Less than significant with implementation of Mitigation Measure GEO-2 (+)	Less than significant with implementation of Mitigation Measure GEO-2 (-)
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 implementation of Mitigation Measures HAZ-1 and HAZ-2	No impact (+)	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2 (-)	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2 (-)
Emit hazardous emissions or handle hazardous materials within 0.25-mile of a school	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2	No impact (+)	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2 (-)	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2 (-)
Hazardous materials sites	No impact	No impact (=)	No impact (=)	No impact (=)
Airport hazards	No impact	No impact (=)	No impact (=)	No impact (=)
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 (No Build)	Alternative 2: No Project Alternative (By-Right Development)	Alternative 3: Mixed Use Alternative
Hydrology and Water Quality				
Violate water quality standards, waste discharge requirements, or degrade surface or groundwater quality	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2	No impact (+)	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2 (-)	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2 (-)
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	No impact (+)	Less than significant (-)	Less than significant (=)
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	No impact (+)	Less than significant (=)	Less than significant (=)
Impede or redirect flood flows	No impact	No impact (=)	No impact (=)	No impact (=)
Risk release of pollutants due to project inundation	No impact	No impact (=)	No impact (=)	No impact (=)
Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2	No impact (+)	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2 (-)	Less than significant with implementation of Mitigation Measures HAZ-1 and HAZ-2 (-)
Land Use and Planning				
Physically divide an established community	Less than significant	No impact (+)	Less than significant (=)	Less than significant (=)
Conflict with land use plans, policies, or regulations adopted to avoid or mitigate an environmental effect	Less than significant with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-8, BIO-9, BIO-10, CUL-1, CUL-2, CUL-3, GEO-1, GEO-2, HAZ-1, HAZ-2 and NOI-1	No impact (+)	Less than significant with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-8, CUL-1, CUL-2, CUL-3, GEO-1, GEO-2, HAZ-1, HAZ-2, and NOI-1 (+)	Less than significant with implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-8, CUL-1, CUL-2, CUL-3, GEO-1, GEO-2, HAZ-1, HAZ-2, and NOI-1 (=)
Noise				
Result in substantial temporary or permanent ambient noise increases	Less than significant with implementation of Mitigation Measure NOI-1	No impact (+)	Less than significant with implementation of Mitigation Measure NOI-1 (-)	Less than significant with implementation of Mitigation Measure NOI-1 (-)
Generate excessive groundborne vibration or groundborne noise levels	Less than significant	No impact (+)	Less than significant (-)	Less than significant (-)
Expose residents or employees to excessive airport noise	No impact	No impact (=)	No impact (=)	No impact (=)
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)	Significant and unavoidable	No impact (+)	Less than significant (+)	Significant and unavoidable (+)
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 (=)

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative (No Build)	Alternative 2: No Project Alternative (By-Right Development)	Alternative 3: Mixed Use Alternative
Tribal Cultural Resources				
Cause a substantial adverse change in the significance of a tribal cultural resources	Less than significant with implementation of Mitigation Measures CUL-1. CUL-2, and CUL-3	No impact (+)	Less than significant with implementation of Mitigation Measures CUL-1. CUL-2, and CUL-3 (+)	Less than significant with implementation of Mitigation Measures CUL-1. CUL-2, and CUL-3 (-)
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	Less than significant	No impact (+)	Less than significant (-)	Less than significant (-)
Wildfire				
Impair an adopted emergency response plan or evacuation plan	Less than significant	No impact (+)	Less than significant (+)	Less than significant (=)
Expose project occupants to pollutant concentrations from wildfire or uncontrolled spread of wildfire	Less than significant	No impact (+)	Less than significant (-)	Less than significant (-)
Require installation or maintenance of infrastructure that may exacerbate fire risk	Less than significant	No impact (+)	Less than significant (+)	Less than significant (-)
Expose people or structures to downslope or downstream flooding or landslides due to post-fire instability	Less than significant with implementation of Mitigation Measure GEO-1	No impact (+)	Less than significant with implementation of Mitigation Measure GEO-1 (-)	Less than significant with implementation of Mitigation Measure GEO-1 (-)

+ 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

Introduction

Governor's Office of Land Use and Climate Innovation. 2025. Shelby Trust Residential Subdivision Project. https://ceqanet.lci.ca.gov/2012081019 (accessed October 2025).

Related Projects

Goleta, City of. 2025a. City of Goleta Cumulative Projects List (Updated September 1, 2025). https://www.cityofgoleta.org/home/showpublisheddocument/32225/638931845054730000 (accessed September 2025).

_____. 2025b. Capital Improvement Program Division. https://www.cityofgoleta.org/your-city/public-works/capital-improvement-program-division (accessed August 2025).

Santa Barbara, County of. 2025a. Housing Element Update. https://www.countyofsb.org/3177/Housing-Element-Update (accessed October 2025).

_____. 2025b. Cumulative Projects List For the Entire County (Updated July 9, 2025). https://content.civicplus.com/api/assets/fbe3d98f-77db-4462-8dcf-f19cbc1aa352 (accessed August 2025).

Environmental Impact Analysis

California Department of Conservation (DOC). 2022. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed August 2025).

_____. 2025. Williamson Act Enrollment Finder. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html (accessed August 2025).

California Department of Finance (DOF). 2025. E-5 Population and Housing Estimates for Cities, Counties, and the State: 2020–2025. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/ (accessed August 2025).

California Energy Commission (CEC). 2025a. 2025 California Green Building Standards Code (CALGreen). https://www.energy.ca.gov/proceeding/2025-california-green-building-standards-code-calgreen (accessed August 2025).

_____. 2025b. 2025 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6). https://www.energy.ca.gov/publications/2025/2025-building-energy-efficiency-standards-residential-and-nonresidential (accessed August 2025).

California Geological Survey (CGS). 2011. Updated Mineral Land Classification Map for Concrete Grade Aggregates in the San Luis Obispo-Santa Barbara Production-Consumption Region, California – South Half.

California State Lands Commission (CSLC). 2025. South Ellwood Project. https://www.slc.ca.gov/oil-and-gas/southellwood/ (accessed August 2025).

Goleta, City of. 2006. General Plan/Coastal Land Use Plan Final EIR: Section 3.12: Public Services and Utilities. https://www.cityofgoleta.org/home/showpublisheddocument/734/635689476246700000 (accessed September 2025).

_____. 2019. Strategic Energy Plan. https://www.cityofgoleta.org/your-city/planning-and-environmental-review/sustainability/strategic-energy-plan (accessed August 2025).

_____. 2024. Sywest Industrial Building Project Draft Environmental Impact Report. https://files.ceqanet.lci.ca.gov/287192-3/attachment/fmYNrMtu1qMLZtXfkETXVzXAIxKDLSsPJ7G0mHTfdYgHYOrQyrUEigG8p6xQYvBvlD25_Sw8P1E6_YUZ0 (accessed September 2025).

_____. 2025a. General Plan/Coastal Land Use Plan. https://www.cityofgoleta.org/your-city/planning-and-environmental-review/general-plan (accessed August 2025).

_____. 2025b. Recreation Across the City. https://www.cityofgoleta.org/play/parks-recreation-open-spaces/recreation-across-the-city (accessed August 2025).

Mico Equipment. 2024. Tier 4 Final Engine in Construction Equipment Mitigate Emissions. https://www.micoequipment.com/blog/tier-4-final-engine-in-construction-equipment-mitigate-emissions/ (accessed October 2025).

Santa Barbara County Association of Governments (SBCAG). 2019. Regional Growth Forecast 2050. https://www.sbcag.org/wp-content/uploads/2023/08/regional_growth_forecast_2050.pdf (accessed August 2025).

Santa Barbara Visitor's Guide. 2025. Goleta Valley Public Library. https://www.santabarbara.com/community/library/goleta-library/ (accessed October 2025).

Aesthetics and Visual Resources

California Department of Transportation. 2019. State Scenic Highway Map. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways (accessed August 2025).

Goleta, City of. 2006. Chapter 6.0 Visual and Historic Resources Element, City of Goleta General Plan/Coastal Land Use Plan. September 2006.Available at: https://www.cityofgoleta.org/your-city/planning-and-environmental-review/general-plan

Air Quality

California Air Resources Board (CARB). 2024. Table of Ambient Air Quality Standards. https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf (accessed August 2025).

_____. 2025a. iADAM Top 4 Summary. https://www.arb.ca.gov/adam/topfour/topfour1.php (accessed August 2025).

_____. 2025b. Air Quality and Meteorological Information System. https://www.arb.ca.gov/aqmis2/aqmis2.php?_ga=2.97191007.118900453.1756246446-1625264315.1736523176 (accessed August 2025).

_____. 2025c. Visibility-Reducing Particles and Health. https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health (accessed August 2025).

_____. 2025d. Sulfate & Health. https://ww2.arb.ca.gov/resources/sulfate-and-health (accessed August 2025).

_____. 2025e. Hydrogen Sulfide & Health. https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health (accessed August 2025).

California Department of Finance (DOF). 2025. E-5 Population and Housing Estimates for Cities, Counties and the State, 2020-2025. https://dof.ca.gov/Forecasting/Demographics/Estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/ (accessed August 2025).

Office of Environmental Health Hazard Assessment. 2015. Guidance Manuel for Preparation of Health Risk Assessments. https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf (accessed August 2025).

Santa Barbara Air Quality Management District (SBCAPCD). 2022.Scope and Content of Air Quality Sections in Environmental Documents. https://www.ourair.org/wp-content/uploads/ScopeContentJanuary2022-LimitedUpdates.pdf (accessed August 2025).

_____. 2025. Meeting Air Quality Standards. https://www.ourair.org/air-quality-standards/#:~:text=Santa%20Barbara%20County%20is%20attainment%20for%20all%20federal,standard%20and%20nonattainment%20for%20the%20state%20PM%2010. (accessed August 2025).

Santa Barbara County Association of Governments (SBCAG). 2019. Regional Growth Forecast 2050. https://www.sbcag.org/wp-content/uploads/2023/08/regional_growth_forecast_2050.pdf (accessed August 2025).

United States Environmental Protection Agency (USEPA). 2004. Clean Air Nonroad Diesel Rule. https://nepis.epa.gov/Exe/ZyPDF.cgi/P10001RN.PDF?Dockey=P10001RN.pdf (accessed August 2025).

_____. 2025. Criteria Air Pollutants. https://www.epa.gov/criteria-air-pollutants (accessed August 2025).

Weather Underground. 2025. Goleta, CA Weather History. https://www.wunderground.com/history/monthly/us/ca/goleta (accessed August 2025).

Western Regional Climate Center. 2016. Santa Barbara Municipal Airport Weather Summary 1941-2016. https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca7905 (accessed August 2025).

Biological Resources

California Department of Fish and Wildlife (CDFW). 2023. California Natural Community Conservation Plans. August 2023. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline (accessed October 2025).

Fletcher, J.L. 1971. Effects of Noise on Wildlife and other Animals. U.S. Environmental Protection Agency.

Goleta, City of. 2006. Goleta General Plan/Coastal Land Use Plan Chapter 4.0, Conservation Element. September 2006. https://www.cityofgoleta.org/home/showpublisheddocument/31364/638682072386670000 (accessed October 2025).

Manci, K.M., Gladwin, D.N., Villella, R., and Cavendish, M.G. 1988. Effects of aircraft noise and sonic booms on domestic animals and wildlife: a literature synthesis. U.S. Fish and Wildlife Service National Ecology Research Center.

Western Regional Climate Center. 2016. Santa Barbara, California. https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca7902 (accessed October 2025).

Cultural Resources

Bickel, P. 1978. Changing Sea Levels along the California Coast: Anthropological Implications. *Journal of California Anthropology* 5:6-20.

Boone, C. 2012. Integrating Zooarchaeology and Modeling: Trans-Holocene Fishing in Monterey Bay, California. University of California Santa Cruz Unpublished Dissertation.

Cartier, R. 1989. Scotts Valley Chronology and Temporal Stratigraphy. *SCA Proceedings* 2:81-111.

Dudek. 2011. *Extended Phase 1 Archaeological Investigation Shelby Residential Project 7400 Cathedral Oaks Road (APN 077-530-019) Goleta, California*. March 2011.

Glassgow, M. 2007. Prehistory of the Northern California Bight and the Adjacent Transverse Ranges. In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, AltaMira Press, Lanham, Maryland.

Hildebrandt, W. 1997. The Relative Importance of Lacustrine and Estuarine Resources to Prehistoric Hunter-Gatherer Populations: A View from Southern Santa Clara Valley, California. *Journal of California and Great Basin Anthropology* 19(2):197-225.

Jones, T. et. al. 2007. The Central Coast: A Midlatitude Milieu. In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 125–146. AltaMira Press, Lanham, Maryland.

Jones, T., and Ferneau, J. 2002. Deintensification along the Central California Coast. In *Catalysts to Complexity, Late Holocene Societies of the California Coast*, edited by Jon M. Erlandson and Terry L. Jones, pp. 205-232. *Perspectives in California Archaeology Vol. 6.* Costen Institute of Archaeology, University of California, Los Angeles.

Jones, T., and Jones, D. 1992. Elkhorn Slough Revisited: Reassessing the Chronology of CA-MNT-229. *Journal of California and Great Basin Anthropology* 14(2):159-179.

Jones, T., and Waugh, G. 1995. Central California Prehistory: A View from Little Pico Creek. *Perspectives in California Archaeology 3.* Institute of Archaeology, University of California, Los Angeles.

_____. 1997. Climatic Consequences of Population Pragmatism? A Middle Holocene Prehistory of the Central Coast. In *Archaeology of the California Coast During the Middle Holocene*, edited by Jon M. Erlandson and Michael A. Glassow, pp. 111–128. *Perspectives in California Archaeology 4.* Institute of Archaeology, University of California, Los Angeles.

Justice, N. 2002. Stone Age Spear and Arrow Points of California and the Great Basin. Indiana University Press, Bloomington, Indiana.

King, C. 1990. *Evolution of Chumash Society: A Comparative Study of Artifacts Used in Social System Maintenance in the Santa Barbara Channel Region Before A.D. 1804.* Revised Ph.D. dissertation with a new preface and updated bibliography. In *The Evolution of North American Indians,* edited by David Hurst Thomas. Garland Publishing, New York.

Langan Engineering and Environmental Services, Inc. 2025. *Cultural Resources Inventory.* June 30, 2025.

Long, A. 2025. *Updated Historical Resource Evaluation of 7400 Cathedral Oaks Road, Goleta, California.* September 2025.

McLaren, D. 2019. Late Pleistocene Archaeological Discovery Models on the Pacific Coast of North America. *PaleoAmerica* 6(1):43-63.

Mills, W. 2005. A Fluted Point from Nipomo, San Luis Obispo County, California. *Journal of California and Great Basin Archaeology* 25(2): 68-74.

Rasmussen, K. 1999. *Phase 1 Cultural Resources Investigation Couvillion Residence (APN 077-530-019) Goleta, California.* January 2019.

Wallace, W. 1955. Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11:214–230.

_____. 1978. Post-Pleistocene Archaeology, 9000 to 2000 BCE In *California*, edited by R. F. Heizer, pp. 25–36. *Handbook of North American Indians,* Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington D.C.

Wohlgemuth, E. 1996. Resource Intensification in Prehistoric Central California: Evidence from Archaeobotanical Data. *Journal of California and Great Basin Anthropology* 18(1):81-103.

Geology and Soils

City of Goleta. 2006a. Safety Element. https://www.cityofgoleta.org/home/showpublisheddocument/32235/638935466846270000 (accessed January 2025).

_____. 2006b. Open Space Element. https://www.cityofgoleta.org/home/showpublisheddocument/32251/638936374481600000 (accessed September 2025).

California Geological Survey (CGS). 2025. Fault Activity Map of California. https://maps.conservation.ca.gov/cgs/fam/ (accessed September 2025).

Hoffman, J. 2025. Santa Barbara Museum of Natural History Earth Science Collection: Search Results of Paleontological Speciments from Santa Barbara County Near the Shelby Residentila Project (25-18152). October 7, 2025.

Jefferson, G.T. 2010. A catalogue of late Quaternary vertebrates from California. *Natural History Museum of Los Angeles County Technical Report*. Volume 7, pp. 5-172.

Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf. (accessed October 2025).

University of California Museum of Paleontology. 2025. UCMP online database specimen search portal, http://ucmpdb.berkeley.edu/ (accessed September 2025)

United States Geological Survey. 2025. U.S. Quaternary Faults. https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf (accessed September 2025).

Greenhouse Gas Emissions

California Air Resources Board (CARB). 2022. 2022 Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf (accessed September 2025).

_____. 2024. 2000-2022 GHG Inventory 2024 Edition). https://ww2.arb.ca.gov/ghg-inventory-data (accessed August 2025).

California Natural Resource Agency. 2019. “California’s Fourth Climate Change Assessment Statewide Summary Report.” January 16, 2019. http://www.climateassessment.ca.gov/state/ (accessed August 2025).

Goleta, City of. 2006a. Conservation Element. https://www.cityofgoleta.org/home/showpublisheddocument/31364/638682072386670000 (accessed September 2025).

_____. 2006b. Transportation Element. https://www.cityofgoleta.org/home/showpublisheddocument/21973/636923877729370000 (accessed September 2025).

_____. 2014. Final Climate Action Plan. July 2014. https://www.cityofgoleta.org/home/showpublisheddocument/9735/635731556780670000 (accessed August 2025).

Intergovernmental Panel on Climate Change (IPCC). 2021. Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf (accessed August 2025).

National Aeronautics and Space Administration. 2025. The Effects of Climate Change. https://science.nasa.gov/climate-change/effects/ (accessed August 2025).

Santa Barbara County Association of Governments (SBCAG). 2025. 2025 Update of Connected 2050 (2021). https://www.sbcag.org/wp-content/uploads/2025/08/Connected2050_August2025.pdf (accessed September 2025).

Santa Barbara, County of. 2024. 2030 Climate Action Plan. file:///C:/Users/eknox/Downloads/2030%20Climate%20Action%20Plan%20Adoption%20Draft%20(1).pdf (accessed September 2025).

World Meteorological Organization. 2013. A Decade of Extremes. July 2013. https://wmo.int/publication-series/global-climate-2001-2010-decade-of-climate-extremes (accessed August 2025).

Hazards and Hazardous Materials

California Department of Conservation. 2000. Radon Zone Map for Santa Barbara County. https://www.conservation.ca.gov/cgs/documents/publications/open-file-reports/OFR-Radon-SantaBarbara-Map.pdf (accessed November 2025).

California Department of Forestry and Fire Protection (CAL FIRE). 2025. Fire Hazard Severity Zone Map. https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9 (accessed September 2025).

California Department of Toxic Substance Control (DTSC). 2025. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=33970004. (accessed August 2025).

_____. 2020. Human Health Risk Assessment Note Number 11 Southern California Ambient Arsenic Screening Level. https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/01/Background_Arsenic.pdf (accessed October 2025).

California Environmental Protection Agency (CalEPA). 2025a. List of “active” CDO and CAO from Water Board. https://calepa.ca.gov/sitecleanup/corteselist/. (accessed August 2025).

_____. 2025b. List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC. (accessed August 2025).

California State Water Resources Control Board (SWRCB). 2025a. GeoTracker. https://geotracker.waterboards.ca.gov/profile_report?global_id=DOD100277300. (accessed August 2025).

_____. 2025b. List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit. https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf. (accessed August 2025).

Santa Barbara County Association of Governments. 2023. Santa Barbara Airport Land Use Compatibility Plan. https://www.sbcag.org/wp-content/uploads/2023/09/sba_alucp_final.pdf (accessed September 2025).

Santa Barbara, County of. 2023. Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan. https://content.civicplus.com/api/assets/ebc26205-512c-48d7-bca7-cfa0a18faa24 (accessed September 2025).

United States Environmental Protection Agency (USEPA). 2025a. What is Asbestos? https://www.epa.gov/asbestos/learn-about-asbestos (accessed September 2025).

_____. 2025b. EPA Actions to Protect the Public from Exposure to Asbestos. https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos (accessed September 2025).

_____. 2025c. Learn about Lead. https://www.epa.gov/lead/learn-about-lead (accessed September 2025).

_____. 2025d. Protect Your Family from Sources of Lead. https://www.epa.gov/lead/protect-your-family-sources-lead (accessed September 2025).

_____. 2025e. Learn about Polychlorinated Biphenyls. https://www.epa.gov/pcbs/learn-about-polychlorinated-biphenyls (accessed September 2025).

_____. 2025f. Mercury. https://www.epa.gov/mercury (accessed September 2025).

_____. 2025g. Superfund Enterprise Management System Search. https://enviro.epa.gov/envirofacts/sems/search (accessed September 2025).

_____. 2025h. Overview of the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP). https://www.epa.gov/asbestos/overview-asbestos-national-emission-standards-hazardousair-pollutants-neshap (accessed September 2025).

Hydrology and Water Quality

California Department of Water Resources (DWR). 2004. California's Groundwater Bulletin 118: Goleta Groundwater Basin. February 2004. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/3_016_Goleta.pdf#:~:text=The%20Goleta%20Groundwater%20Basin%20is%20bounded%20on%20the,precipitation%20for%20the%20basin%20is%20about%2017%20inches (accessed September 2025).

_____. 2025a. Basin Prioritization Map. https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed September 2025).

_____. 2025b. Critically Overdrafted Basins. https://water.ca.gov/programs/groundwater-management/bulletin-118/critically-overdrafted-basins (accessed October 2025).

California Department of Transportation. 2025. Caltrans Water Quality Planning Tool. https://svctenvims.dot.ca.gov/wqpt/wqpt.aspx (accessed September 2025).

California Geological Survey (CGS). 2025. Santa Barbara County Tsunami Hazard Areas. https://www.conservation.ca.gov/cgs/tsunami/maps/santa-barbara (accessed September 2025).

Central Coast Regional Water Quality Control Board (RWQCB). 2019. Water Quality Control Plan for the Central Coast Basin. https://www.waterboards.ca.gov/centralcoast/publications_forms/publications/basin_plan/docs/2019_basin_plan_r3_complete_webaccess.pdf (accessed September 2025).

_____. 2025. California Basin Plan Beneficial Use Viewer. https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=116f7daa9c4d4103afda1257be82eb16 (accessed September 2025).

Federal Emergency Management Agency (FEMA). 2025. FEMA's National Flood Hazard Layer (NFHL) Viewer. https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd (accessed September 2025).

Goleta, City of. 2006. Goleta General Plan/Coastal Land Use Plan 5.0 Safety Element. September 2006. https://www.cityofgoleta.org/home/showpublisheddocument/29811/638369309624130000 (accessed September 2025).

Goleta Water District (GWD). 2021. 2020 Urban Water Management Plan Update. June 2021. https://www.goletawater.com/doc/1193/ (accessed September 2025).

_____. 2023. Groundwater Management Plan Goleta Groundwater Basin. April 2023. https://www.goletawater.com/docs/Goleta-GWMP_2022Update_Final.pdf (accessed January 2025).

Santa Barbara, County of. 2017. Stormwater Technical Guide for Low Impact Development. https://www.cityofgoleta.org/home/showpublisheddocument/24855/63752283432627000 (accessed September 2025).

State Water Resources Control Board (SWRCB). 2025. 2024 California Integrated Report. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html (accessed September 2025).

United States Department of Agriculture-Natural Resources Conservation Service. 2009. Park 630 Hydrology National Engineering Handbook Chapter 7 Hydrologic Soil Groups. January 2009. https://directives.nrcs.usda.gov/sites/default/files2/1712930597/11905.pdf (accessed September 2025).

Land Use and Planning

Goleta, City of. 2006. Final Goleta General Plan/Coastal Land Use Plan Environmental Impact Report (SCH # 2005031151). https://www.cityofgoleta.org/your-city/planning-and-environmental-review/general-plan/general-plan-coastal-land-use-plan-final-eir (accessed September 2025).

Santa Barbara County Fire Department. 2023. 2023 Strategic Fire Plan. https://sbcfire.com/wp-content/uploads/2023/05/SBC-Unit-Fire-Plan-2023-Final.pdf (accessed October 2025).

Noise

Carrier. 2007. 24ABA4 Base Series 14 Air Conditioner. https://www.shareddocs.com/hvac/docs/1009/Public/00/24ABA4-2PD.pdf (accessed August 2025).

Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed August 2025).

Goleta, City of. 2006. Goleta General Plan/Coastal Land Use Plan 9.0 Noise Element. https://www.cityofgoleta.org/home/showpublisheddocument/29813/638369386164200000 (accessed September 2025).

Transportation and Circulation

Goleta, City of. 2006. Goleta General Plan/Coastal Land Use Plan 7.0 Transportation Element. https://www.cityofgoleta.org/home/showpublisheddocument/21973/636923877729370000 (accessed September 2025).

_____. 2025. Goleta – Maps. https://goleta.onlinegovt.com/mapping/results (accessed September 2025).

Governor's Office of Land Use and Climate Innovation (LCI). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. April 2018. https://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf (accessed January 2025).

Santa Barbara County Association of Governments (SBCAG). 2021. Connected 2050. August 2021. https://www.sbcag.org/wp-content/uploads/2023/09/Connected-2050-Final.pdf (accessed January 2025).

Santa Barbara Metropolitan Transit District (MTD). 2024. FY 2025 System Ridership Report for the 1st Quarter and or the Three-Month Period Ending September 30th, 2024. https://sbmtd.gov/wp-content/uploads/2024/11/Q1_FY25Report.pdf (accessed September 2025).

_____.2025. Goleta, Isla Vista, and Ellwood Route Map. https://sbmtd.gov/wp-content/uploads/2023/08/MTD-System-Map-2023_GoletaIVEllwood.pdfn (accessed September 2025).

Tribal Cultural Resources

Dudek. 2011. *Extended Phase 1 Archaeological Investigation Shelby Residential Project 7400 Cathedral Oaks Road (APN 077-530-019) Goleta, California.* March 2011.

Gamble, Lynn H., Phillip L. Walker, and Glenn S. Russell. 2001. An Integrative Approach to Mortuary Analysis: Social and Symbolic Dimensions of Chumash Burial Practices. *American Antiquity*, vol. 66, no. 2, pp. 185-212. Cambridge University Press.

Goleta, City of. 2006. Open Space Element. https://www.cityofgoleta.org/home/showpublisheddocument/32251/638936374481600000 (accessed September 2025).

King, L.B. 1969. The Medea Creek Cemetery (LAN-243): An Investigation of Social Organization from Mortuary Practices. *University of California Archaeological Survey Annual Report* 11:23-68. Los Angeles.

Landberg, L. 1963. Subsistence Patterns of the Chumash Indians of Southern California. *University of Arizona Department of Anthropology*.

Langan Engineering and Environmental Services, Inc. 2025. *Cultural Resources Inventory.* June 30, 2025.

Miller, N. 1988. Ratios in Paleoethnobotanical Analysis. In *Current Paleoethnobotany: Analytical Methods and Cultural Interpretations of Archaeological Plant Remains*, edited by Christine A. Hastorf and Virginia S. Popper, pp. 72-85. University of Chicago Press, Chicago.

Mithun, M. 2001. The Languages of Native North America. Reprinted. Cambridge University Press, Cambridge, Massachusetts. Originally published 1999, Cambridge University Press, Cambridge, Massachusetts.

Pappo, K. 2014. Letter to Shine Ling, from Kathleen Pappo, Barbareno/Ventureno Band of Mission Indians; dated August 6, 2014.

Rasmussen, K. 1999. *Phase 1 Cultural Resources Investigation Couvillion Residence (APN 077-530-019) Goleta, California*. January 2019.

Utilities and Service Systems

California Department of Finance. 2025. E-5 Population and Housing Estimates for Cities, Counties and the State, 2020-2025. https://dof.ca.gov/Forecasting/Demographics/Estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/ (accessed September 2025).

California Department of Resources, Recycling, and Recovery (CalRecycle). 2025a. South Coast Recycling & Transfer Station (42-AA-0014). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1251?siteID=3282 (accessed September 2025).

_____. 2025b. Tajiguas Res Rec Proj & Sanitary LF (42-AA-0015). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1252?siteID=3283 (accessed September 2025).

_____. 2025c. Kettleman Hills – B18 Nonhaz Codisposal (16-AA-0023). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3771?siteID=914 (accessed September 2025).

California Department of Water Resources (DWR). 2025. Critically Overdrafted Basins. https://water.ca.gov/programs/groundwater-management/bulletin-118/critically-overdrafted-basins (accessed October 2025).

Central Coast Community Energy. 2025. Community Impact. https://3cenergy.org/ (accessed October 2025).

Goleta, City of. 2006. Goleta General Plan/Coastal Land Use Plan FEIR Section 3.12 Public Services and Utilities. https://www.cityofgoleta.org/home/showpublisheddocument/734/635689476246700000 (accessed September 2025).

Doggett, S. 2025. Best Cell Phone Coverage in Goleta, CA. https://coveragemap.com/cell-phone-coverage/california/santa-barbara/goleta/ (accessed October 2025).

Goleta Water District (GWD). 2019. Goleta Water District Board Declares End of Water Shortage. August 13, 2019. https://www.goletawater.com/newsletters-and-press/goleta-water-district-board-declares-end-of-water-shortage/ (accessed January 2025).

_____. 2021. 2020 Urban Water Management Plan. https://www.goletawater.com/doc/1193/ (accessed September 2025).

_____. 2023. Groundwater Management Plan Goleta Groundwater Basin 2022 Update. April 2023. https://www.goletawater.com/docs/Goleta-GWMP_2022Update_Final.pdf (accessed September 2025).

_____. 2024a. Water Supply Management Plan 2024 Update. https://www.goletawater.com/doc/16817/ (accessed September 2025).

_____. 2024b. 2025 SAFE Potable Water Allocations. https://www.goletawater.com/mtgdocs/14463/Item_4_12-10-2024.pdf (accessed September 2025).

_____. 2025a. Goleta Water District Code. https://www.goletawater.com/doc/1212/ (accessed September 2025).

_____. 2025b. New Water Allocations, https://www.goletawater.com/newsletters-and-press/new-water-allocations/ (accessed October 2025).

Goleta West Sanitary District (GWSD). 2025. District Overview. https://goletawest.org/about (accessed September 2025).

McCarthy, Brian. General Manager/Superintendent Goleta West Sanitary District. Personal communications via email regarding current wastewater inflows to the wastewater treatment plant with Ethan Knox, Rincon Consultants, Inc. February 10, 2025.

Santa Barbara, County of. 2023. Annual Report 2022/2023 Solid Waste Management Services. https://www.countyofsb.org/192/Resource-Mgmt (accessed September 2025).

Southern California Edison (SCE). 2025. Building a Better Tomorrow. https://www.edisoncareers.com/about-sce/ (accessed October 2025).

Southern California Gas Company. 2025. About Us. https://www.socalgas.com/about-us (accessed October 2025).

United States Environmental Protection Agency (USEPA). 1998. Characterization of Building-Related Construction and Demolition Debris in the United States. June 1998. https://www.epa.gov/sites/default/files/2016-03/documents/charact_bulding_related_cd.pdf (accessed September 2025).

Wildfire

Atkinson, W. 2018. “The Link Between Power Lines and Wildfire.” Electrical Contractor Magazine. [online journal]. Published November 2018. https://www.ecmag.com/magazine/articles/article-detail/systems-link-between-power-lines-and-wildfires. (accessed October 2025).

California Department of Forestry and Fire Protection (CAL FIRE). 2019. Wildland Urban Interface. https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/what-we-do/fire-resource-assessment-program---frap/pdf-maps/wildland-urban-interface-2019.pdf?rev=e44c740c777940c6bda816c42c886c87&hash=52A9A0873B1CBF3E468DC52D4E5CB5B5. (accessed October 2025).

_____. 2024a. CAL FIRE Strategic Plan. https://cal-fire-communications.paperturn-view.com/cal-fire-strategicplan24-web?pid=ODg8828162&p=5&v=2. (accessed October 2025).

_____. 2024b. Fire Hazard Severity Zones in State Responsibility Area, Effective April 1, 2024. https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9 . (accessed October 2025).

_____. 2025. City of Goleta Local Responsibility Area Fire Hazard Severity Zones. Fire Hazard Severity Zones in Local Responsibility Area - City of Goleta. (accessed October 2025).

California Office of Emergency Services. 2023. 2023 California State Hazard Mitigation Plan. https://www.caloes.ca.gov/wp-content/uploads/Hazard-Mitigation/Documents/2023-California-SHMP_Volume-1_11.10.2023.pdf (accessed October 2025).

_____. 2024. California State Emergency Plan. 2023 California State Emergency Plan Coordinating Draft. https://www.caloes.ca.gov/wp-content/uploads/Preparedness/Documents/2023-SEP-Draft-Public-Review.pdf (accessed October 2025).

_____. 2025. CalOES Regional Contacts Viewer. https://experience.arcgis.com/experience/a4aeeb47056b47c69edf8dc568d7c905/ (accessed October 2025).

City of Goleta. 2012. City of Goleta Community Wildfire Protection Plan. https://sbcfire.com/wp-content/uploads/2022/08/CommunityWildfireProtectio1.pdf. (accessed October 2025).

_____. 2025a. Goleta Fire Stations. https://www.cityofgoleta.org/your-city/city-manager-s-office/public-safety/goleta-fire-stations. (accessed October 2025).

_____. 2025b. City of Goleta General Plan Transportation Element. https://www.cityofgoleta.org/home/showpublisheddocument/32239/638935466859270000. (accessed October 2025).

_____. 2025c. City of Goleta General Plan Figure 5-4: Residential Areas with One Egress and Very High Fire Hazard Severity Zone. https://www.cityofgoleta.org/home/showpublisheddocument/32161/638917080817200000. (accessed October 2025).

_____. 2025d. City of Goleta General Plan Safety Element. https://www.cityofgoleta.org/home/showpublisheddocument/32235/638935466846270000. (accessed October 2025).

_____. 2025e. City of Goleta General Plan Public Facilities Element. https://www.cityofgoleta.org/home/showpublisheddocument/32241/638935466866070000. (accessed October 2025).

National Park Service. 2017. Wildland Fire Behavior. Last updated February 16, 2017. https://www.nps.gov/articles/wildland-fire-behavior.htm (accessed October 2025).

Santa Barbara County Fire Department (SBCFD). 2023. Development Standards. https://sbcfire.com/development-standards/. (accessed October 2025).

_____. 2025a. County Station 11. https://sbcfire.com/project/county-fire-stations/. (accessed October 2025).

_____. 2025b. County Station 12. https://sbcfire.com/project/county-station-12/. (accessed October 2025).

_____. 2025c. County Station 14. https://sbcfire.com/project/county-station-14/. (accessed October 2025).

Santa Barbara County Fire Safe Council. 2025. Fire History of Santa Barbara County. https://sbfiresafecouncil.org/fire-history-of-santa-barbara-county/. (accessed October 2025).

University of California. 2018. Wildland Fire Safety, Field Operations Manual. Berkeley, CA. https://www.ucop.edu/safety-and-loss-prevention/_files/field-research-safety/wildland-fire-safety.pdf (accessed October 2025).

Other CEQA Concerns

California Department of Finance (DOF). 2025. E-5 Population and Housing Estimates for Cities, Counties, and the State: 2020–2025. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/ (accessed October 2025).

Goleta Water District (GWD). 2021. 2020 Urban Water Management Plan. https://www.goletawater.com/water-supply/urban-water-management-plan (accessed October 2025).

Santa Barbara County Association of Governments (SBCAG). 2019. Regional Growth Forecast 2050. https://www.sbcag.org/wp-content/uploads/2023/08/regional_growth_forecast_2050.pdf (accessed October 2025).

Alternatives

California Department of Finance (DOF). 2025. E-5 Population and Housing Estimates for Cities, Counties and the State, 2020-2025. https://dof.ca.gov/Forecasting/Demographics/Estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/ (accessed August 2025).

Carrier. 2007. 24ABA4 Base Series 14 Air Conditioner. https://www.shareddocs.com/hvac/docs/1009/Public/00/24ABA4-2PD.pdf (accessed August 2025).

Goleta, City of. 2006a. Goleta General Plan/Costal Land Use Plan Final EIR Section 3.8 Population and Housing. September 2006. https://www.cityofgoleta.org/home/showpublisheddocument/738/635689476246700000 (accessed October 2025).

_____. 2006b. Section Goleta General Plan/Costal Land Use Plan Final EIR Section 3.12 Public Services and Utilities. https://www.cityofgoleta.org/home/showpublisheddocument/734/635689476246700000 (accessed October 2025).

Kiefer, J., and Krentz, L. 2018. Water Use in the Multi-Family Housing Sector. https://www.waterrf.org/sites/default/files/file/2019-07/SWMC18-Kiefer_Krentz.pdf (accessed October 2025).

Long, A. 2025. *Updated Historical Resource Evaluation of 7400 Cathedral Oaks Road, Goleta, California.* September 2025.

LoopNet. 2025. Goleta, CA Land Parcels for Sale. https://www.loopnet.com/ (accessed October 2025).

Realtor.com. 2025. Goleta, CA Land & Lots for Sale. https://www.realtor.com/ (accessed October 2025).

Santa Barbara County Association of Governments (SBCAG). 2019. Regional Growth Forecast 2050. https://www.sbcag.org/wp-content/uploads/2023/08/regional_growth_forecast_2050.pdf (accessed August 2025).

United States Energy Information Administration. 2013. Apartments in Buildings with 5 or More Units Use Less Energy than Other Home Types. https://www.eia.gov/todayinenergy/detail.php?id=11731 (accessed October 2025).

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