UCSB

UNIVERSITY OF CALIFORNIA
SANTA BARBARA

Final Environmental Impact Report

Goleta Point Faculty Housing/Classroom Project

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19 March 2025

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1.0 Introduction

This Final Environmental Impact Report (EIR) evaluates the potential environmental impacts of the Goleta Point Faculty Housing/Classroom Project prepared for the University of California, Santa Barbara Office of Campus Planning & Environmental Review in compliance with the California Environmental Quality Act (CEQA). The EIR serves as an informational document that would inform public agency decision-makers and the public of the project's significant environmental effects, propose mitigation measures, and describe reasonable alternatives to the project, as outlined in CEQA Guidelines Section 15121.

1.1 Section Overview

As per CEQA Guidelines Section 15132, this report discusses the project's background, potential environmental impacts, proposed mitigation measures, and the public agencies commenting on the draft EIR. Section 2.0, Project Description, provides a comprehensive overview of the project, outlining its construction and operational details. Section 3.0, Environmental Setting, describes the current conditions of the project site to provide context for understanding what would be altered by the project. Section 4.0, Impacts and Mitigation Measures, identifies the project's significant environmental impacts and outlines the measures proposed to mitigate those impacts. Section 5.0, Cumulative Impacts, considers the project's combined environmental effects and other related projects in the area. Section 6.0, Project Alternatives, evaluates various alternatives to the proposed project, including the "No Project" alternative, Reduced, Reconfigured, and Off-Site Projects. The reduced project focuses on reducing the number of residential units and classrooms while maintaining feasibility for development. The Reconfigured Project aims to modify the site layout and design by realigning the access road to avoid sensitive riparian and bluff scrub habitats along the lagoon, reducing grading and limiting direct habitat loss. Although both alternatives reduce the project impacts, the Off-Site Alternative is the Environmentally Superior Alternative since it relocates the Project to the lot where the San Benito Housing project is proposed, a previously approved student housing development within UCSB’s jurisdiction that has already been designated for development. Section 7.0, Public Comments and Responses, documents the feedback received from the public and agencies during the review process, along with the responses provided. Based on their applicability, the comments have been incorporated into the Final EIR. To distinguish these changes, they have been indicated with either an underline to show that something was added or a strikeout for what has been removed. This addresses that the comments were well received and have been considered, as the public comment period is vital for creating the most transparent document possible. Finally, Section 8.0, References, lists all sources utilized during the preparation of the EIR.

1.2 Necessary Approvals

This EIR is essential for informing the various decision-makers at the University of California, Santa Barbara Office of Campus Planning & Environmental Review, and other responsible agencies, guiding the approval process. The proposed project requires the approval of the UC Santa Barbara Office of Campus Planning & Environmental Review, the Coastal Commission, the United States Army Corps of Engineers, the United States Fish and Wildlife Service, and the Environmental Protection Agency that would enforce the Endangered Species Act. The project’s approval would be based on the findings in this EIR, with necessary mitigation measures being integrated into the project’s design and implementation.

1.3 Impact Summary

The EIR also includes a Summary Impact Table (see Tables 1-1 & 1-2), highlighting the project's significant impacts and proposed mitigation measures. These tables are crucial for understanding the project’s potential environmental consequences and how these can be reduced to acceptable levels, as discussed in CEQA Guidelines Section 15123.

Table 1-1 Summary of Class I Impacts Summary

Impact	Mitigation Measures	Significance After Mitigation
Class I - Significant and Unavoidable A Statement of Overriding Considerations would be adopted for each of the following impacts pursuant to CEQA Section 15093(b) supported by substantial evidence in the record.		
Impact BIO-1: Vegetation removal from construction activities, such as grading, within the project site would result in the loss of southern coastal bluff scrub, southern coastal salt marsh, and southern riparian scrub. Removing these plant communities would affect rare or endangered plant species within a designated ESHA under the UCSB LRDP.	**MM BIO-1:** To compensate for the permanent loss of sensitive habitat, the applicant shall submit a Habitat Restoration Plan (HRP) prepared by a qualified biologist. The HRP shall be designed to restore, enhance, and protect native vegetation within designated restoration areas, including mature native planting and invasive species removal with long-term habitat management. **Plan Requirments:** A qualified biologist shall prepare the HRP, including native species planting, irrigation, invasive species removal, and fencing. The plan shall be submitted before grading permit issuance. **Monitoring:** UCSB Office of Campus Planning & Environmental Review shall conduct annual on-site inspections during planting for 20 years to verify compliance. After successful restoration implementation, performance security shall be released after the annual benchmark.	**Less than Significant**
Impact BIO-2: Construction activities such as grading and excavating would result in the loss of nesting habitat for avian species, resulting in a potentially significant short-term impact.	**MM BIO-2:** To mitigate the loss of nesting habitat for avian species, the applicant shall retain a qualified biologist or certified arborist to prepare and implement a Tree Replanting Plan (TRP) designed to restore mature native trees that provide comparable height, structure, and ecological function to those removed. The TRP shall be developed with specific tree species selection and requirements and a construction buffer to avoid nesting. **Plan Requirments:** A qualified biologist or certified arborist shall prepare the TRP, including species selection, tree height, planting density, and maintenance measures. The plan must be submitted prior to the issuance of grading permits, including vegetation clearing. **Monitoring:** UCSB Office of Campus Planning & Environmental Review shall conduct on-site inspections during planting and annually for 25 years to verify compliance. A final performance security shall be released upon successful tree establishment.	**Less than Significant**
Impact BIO-3: Long-term operations, including the introduction of permanent structures, roadways, and lighting	**MM BIO-3:** To mitigate the disruption of migratory corridors and foraging behavior caused by artificial lighting, the applicant shall develop and implement a Wildlife-Sensitive Lighting Plan (WSLP) designed to minimize light pollution and reduce nighttime habitat disturbances for species of special concern by implementing a	**Less than Significant**

from the proposed project, would disturb the migratory corridors and foraging behavior of the White-tailed Kite (*Elanus leucurus*), California Thrasher (*Toxostoma redivivum*), and Monarch Butterfly (*Danaus plexippus*).	low-intensity and shielded lighting fixtures and lighting placement with timing restrictions. **Plan Requirments:** In coordination with a certified biologist approved by CDFW, a qualified lighting consultant shall prepare a WSLP detailing shielded fixtures, reduced intensity, motion activation, and timing restrictions. The plan must be submitted before building permit issuance. **Monitoring:** A certified biologist approved by CDFW shall conduct on-site inspections during installation and within the first year of operation to ensure compliance. Adaptive changes shall be implemented if post-installation monitoring indicates significant disruption to wildlife.	

Table 1-2 Summary of Class II Impacts Summary

Impact	Mitigation Measures	Significance After Mitigation
Class II - Potentially Significant but Feasibly Mitigated Findings would be adopted for each of the following impacts pursuant to CEQA Section 15091(a)(1) indicating that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects, as supported by substantial evidence in the record.		
Impact BIO-4: Long-term operations from the proposed project would increase human presence in previously minimally habited areas, disturbing the California ground squirrel (*Spermophilus beecheyi*), brush rabbit (*Sylvilagus bachmani*), Botta's pocket gopher (*Thomomys bottae*), and mallard duck (*Anas platyrhynchos)*.	**MM BIO-4:** To mitigate the increased human presence and disturbance to terrestrial species, a Habitat Enhancement Plan (HEP) would provide native natural barriers and habitat enrichment for the mammals present The plan shall include a buffer with native vegetation and minimize disturbance through human activity management. **Plan Requirments:** A certified biologist approved by CDFW shall prepare a HEP detailing buffer size, species selection, habitat enrichment strategies, and maintenance measures. The plan must be submitted before project occupancy. **Monitoring:** A certified biologist approved by CDFW shall conduct on-site inspections during planting and annually for 20 years to ensure compliance. Adaptive changes shall be implemented if monitoring indicates habitat disturbance.	**Less than Significant**

2.0 Project Description

This section presents the proposed Goleta Point Faculty Housing/Classroom project details, including the location, project objectives, and construction equipment. It also describes the characteristics, specifications, and associated required permit approvals.

2.1 Project Objectives

The proposed Goleta Point Faculty Housing/Classroom project would address the well-documented issue of high living costs in the Santa Barbara area by providing faculty housing and additional classroom space for the growing University of California, Santa Barbara (UCSB). The project proposes a three-story structure that combines 23 residential units with approximately 12 classrooms. This design would help maximize the land use while addressing the University's pressing housing and educational needs.

Housing affordability has long been challenging in Santa Barbara County, a desirable but expensive area. The University competes nationally for top-tier professors and faculty members, many of whom weigh living costs into their future employment decisions. By offering near-campus housing, UCSB can attract and retain educators who can contribute to their goals of being a prestigious research institution. This project would enhance the university’s reputation and benefit the public through high-quality teaching and research.

The current state of the housing market in Santa Barbara is troubling to those who wish to live close enough to work at UCSB. Santa Barbara, in general, faces a severe housing crisis marked by high costs and limited supply, driven by geographical constraints, strict zoning laws, and high demand due to the concentration of students. The region's average home prices and rental rates far exceed national averages, making housing unaffordable for many. This has led to long commutes from more affordable areas, hampering quality of life and hindering UCSB's ability to attract top professors and faculty members. While UCSB provides some student housing, faculty options are scarce, forcing many into the competitive private market. This housing shortage impacts the university and exacerbates income inequality, creating an economic stratification in the broader Santa Barbara community.

The proposed Goleta Point Faculty Housing project would expand the range of housing options available to UCSB faculty (see Figure 2.1), complementing existing developments like the Sierra Madre Apartments (rental housing for faculty and staff), Ocean Walk at North Campus (for-sale housing), and West Campus Point (for-sale housing) as the current locations range from approximately a mile to two miles from UCSB. By adding 23 new residential units, the project would enhance UCSB's ability to provide affordable and convenient living options for its faculty, addressing the critical housing shortage in the region. This project would enable UCSB and its ability to achieve the following objectives:

- Provide faculty housing to address the critical shortage of affordable housing for faculty in Santa Barbara, improving UCSB's ability to attract and retain high-quality educators;
- Expand educational facilities by adding approximately 12 classrooms, totaling around 9,510 square feet, within a 10- to 15-minute walk from existing facilities to accommodate the needs of a growing university population.
- Optimize land use by developing a mixed-use structure that combines residential units and classrooms, maximizing limited campus space;
- Support competitive recruitment by strengthening UCSB’s position in the competitive academic market by offering desirable, on-campus housing in a region known for high living costs;
- Improve campus accessibility by extending and enhancing Lagoon Road for safe, efficient access to the site while integrating infrastructure like parking and utilities.

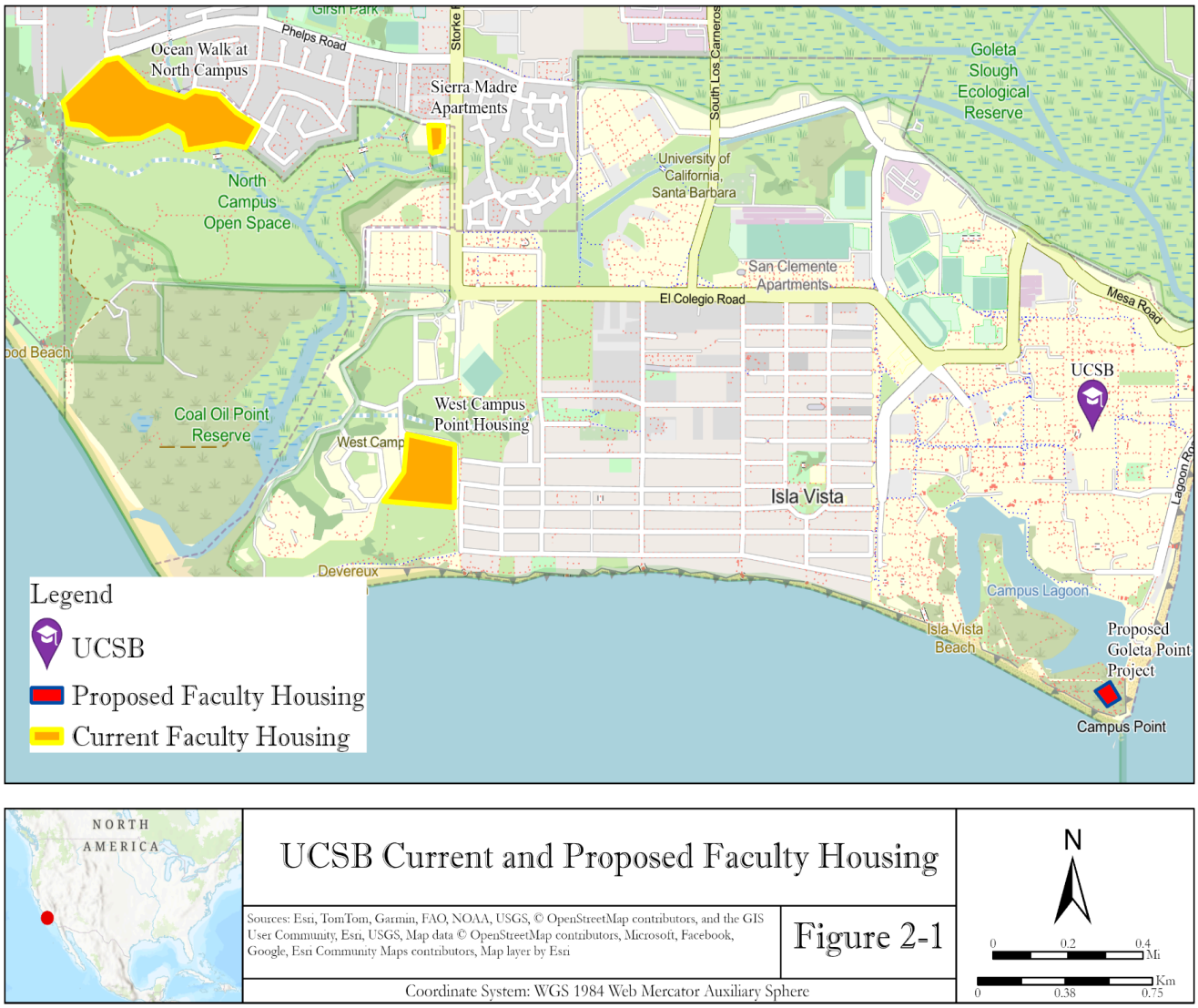

Figure 2-1 Map of Current as well as Proposed Faculty Housing Owned by UCSB

2.2 Project Location

The approximately 0.92-acre Faculty Housing/Classroom Project would be centrally located within Campus Point in southern Santa Barbara County, CA (see Figure 2-3, page 2-5). This coastal site occupies the southeast corner of the UCSB campus, extending toward the Pacific Ocean with scenic views of the Channel Islands (see Figure 2-2). The project would be accessed via Lagoon Road, an existing roadway that terminates near the Marine Science Institute Center (see Figure 2-4, page 2-6).

Table 2-1 Project Site Characteristics

Present Use and Development	Environmentally Sensitive Habitat Area (ESHA) Open Space
Site Size	~ 0.92 acres
Proposed General Plan and Land Use Designation	Campus Residential and Academic
Surrounding Uses	**North**: UCSB's Main Campus, Marine Biotechnology Center, student dormitories, and the Campus Lagoon **East**: Coastal open space, bluff-top trails **South** - Beaches, bluff-top trails, Pacific Ocean, Channel Islands. **West**: Open space, beach coastline, Isla Vista
Access	Lagoon Road
Utilities and Public Services	**It is reasonable to assume;** **Water** - Goleta Water District **Wastewater** - Goleta West Sanitary District **Solid Waste** - MarBorg Industries **Electricity** - Southern California Edison **Gas** - Southern California Gas **Cable** - Cox Communications **Telecom** - Verizon, Qwest, AT&T

2.3 Surrounding Land Uses

The Campus Point project site features a diverse landscape that shapes its setting. The northern boundary includes an Environmentally Sensitive Habitat Area (ESHA), the Campus Lagoon, UCSB's Main Campus, student dorms, and the Marine Science Institute, with the Santa Ynez Mountains in the background. The lagoon supports birdwatching and ecological research, while nearby residence halls provide outdoor recreation.

The eastern foreground features coastal open space, bluff-top trails, natural vegetation, and views of the Pacific Ocean. Campus Point Beach, managed by UCSB, offers year-round recreation. In the middle ground are Goleta Beach Park and Goleta Pier. The Channel Islands are visible in the background.

The southern edge connects directly to the Pacific Ocean, where sandy beaches and bluff trails support jogging, sunbathing, and wildlife observation. The Pacific Ocean and the Channel Islands define the background.

The western foreground is bordered by open space and the beach coastline, which leads toward the Isla Vista community in the middle ground. Though affected by coastal erosion and bluff instability, this area remains vital for outdoor recreation, including surfing, biking, and walking along the beach. In the distance, before the Pacific Ocean, the Oil Platform Holly becomes visible in the background.

Figure 2-2 Regional Location of Proposed Faculty Housing Project Site

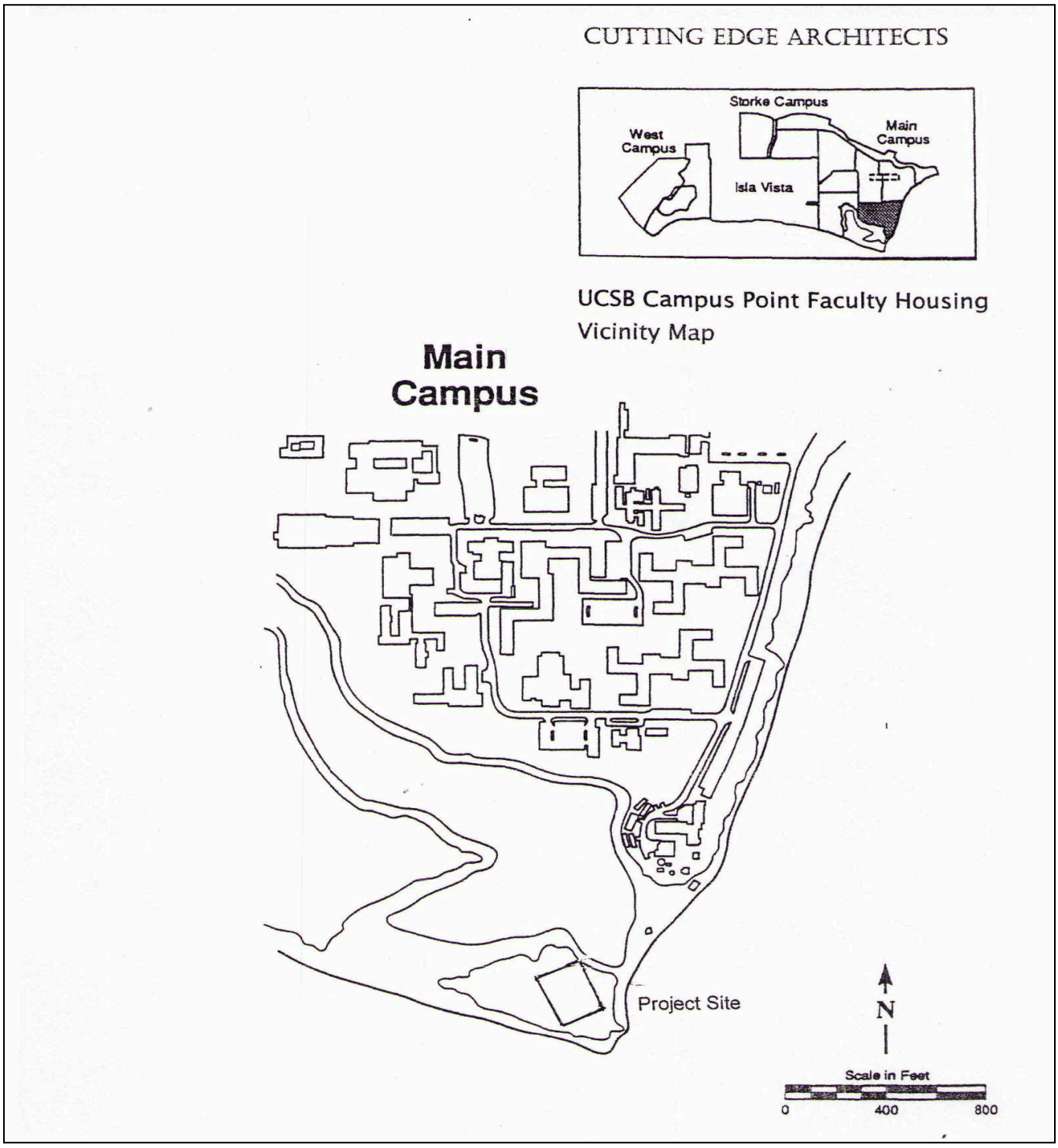

Figure 2-3 Vicinity Map of the Proposed Project Site Location

Figure 2-4 Satellite Aerial Photo of Proposed Project Site

2.4 Project Construction

2.4.1 Schedule

It is reasonable to assume that the proposed Goleta Point Faculty Housing/Classroom project would take 10 months to complete. Grading would occur over the first four months, and building construction would last the remaining six months. Daily construction activities would follow standard union schedules during the weekdays, typically from 7:00 AM to 5:00 PM, avoiding weekends and holidays whenever possible.

2.4.2 Grading

Grading would be balanced on-site to minimize material import and export, as the site's relatively level topography requires only minor cut and fill (see Figure 2-4). Based on a site visit conducted on January 13th, 2025, it is reasonable to assume that approximately 5,200 cubic yards (c.y.) would be cut, and 5,200 c.y. filled. It is reasonable to assume that at this time, based on the information provided by the applicant, no excess soil would

need to be imported/exported. Any existing building materials currently located on-site, such as the asphalt foundation in the proposed project location seen in Figure 2-3, would be excavated and hauled to a permitted disposal location. It is reasonable to assume that the project would also include retaining walls with a maximum height of approximately 20 feet to accommodate site leveling and stability along the proposed access road (see Figure 2-7, page 2-10). Vegetation removal would be limited to areas within the building envelope and access road footprint, with tree trunks fenced off to prevent disturbance and drip lines used to guide preservation efforts (see Figure 2-5).

2.4.3 Equipment

Standard construction equipment, including graders, bulldozers, dump trucks, and backhoes, would be used for site preparation, excavation, and utility installation. Construction access would utilize an extension of Lagoon Road from UCSB Mesa Road to the north, with staging areas established outside Lagoon Road to limit disruption. Lagoon Road would be upgraded to adhere to city guidelines and would be a minimum of 24 feet across. The two-way access road would be built a minimum of two feet above the 100-year flood plain surrounding the lagoon (see Figure 2-7, page 2-10).

2.4.4 Cut Slope and Characteristics of Proposed Access Road

All the cut slopes needed for the road would be supported by a retaining wall made from standard construction materials of cement block, and it would be reasonable to assume that it would not exceed 20 feet in height for the road. For the road to be developed, it is reasonable to assume that the slope would need to be cut approximately 28 feet into the slope to meet the requirements of the proposed road and possible bike path. The road would be angled away from the lagoon so that no runoff would flow into the lagoon. The road's drainage would be engineered so that catch basins and silt traps would ensure that drainage from the roadway and parking areas does not flow untreated into the nearby bodies of water.

2.4.5 Existing and Proposed Stairway

The applicant stated that the existing stairway was found to be sufficient and would not require repairs, contradictory to the initial application (see Figure 2-6, page 2-9). As a way to create accessibility for the residents and faculty members, there would be a new stairway that would provide an access point to the beach on the southeast side of the project site (see Figure 2-6, page 2-9). It is reasonable to assume that this would be built to prevent bluff erosion, similar to the design of a pier where high tides or extreme weather events would not compromise the structural integrity.

2.4.6 Utility Development

Utility lines for water, sewer, and electricity would be underground along the roadway shoulder and connected to existing infrastructure near the Marine Sciences Lab and Reef Aquarium (see Figure 2-6, page 2-9). Security fencing would enclose the site to ensure safety, while noise and dust control measures would be implemented to minimize impacts on adjacent recreational and ecological areas.

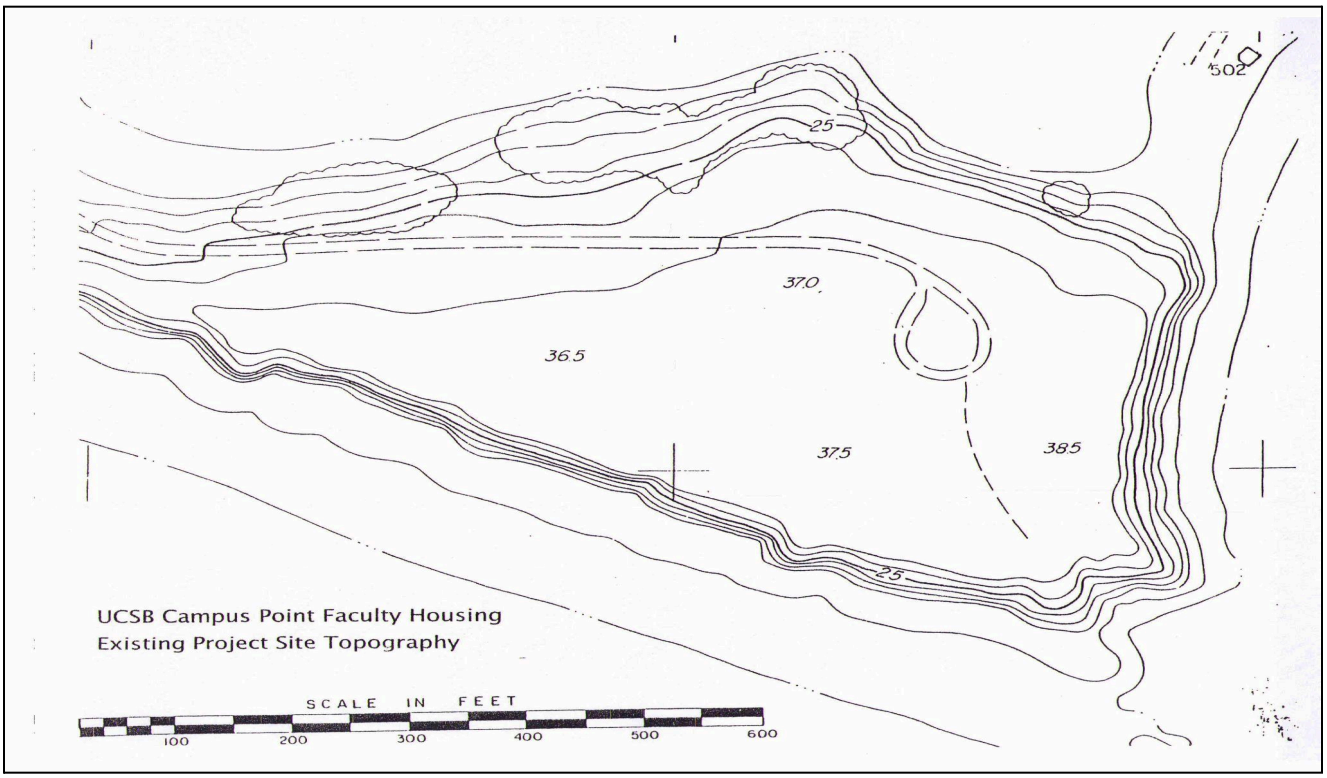

Figure 2-5 UCSB Campus Point Faculty Housing Project Site Topographic Map

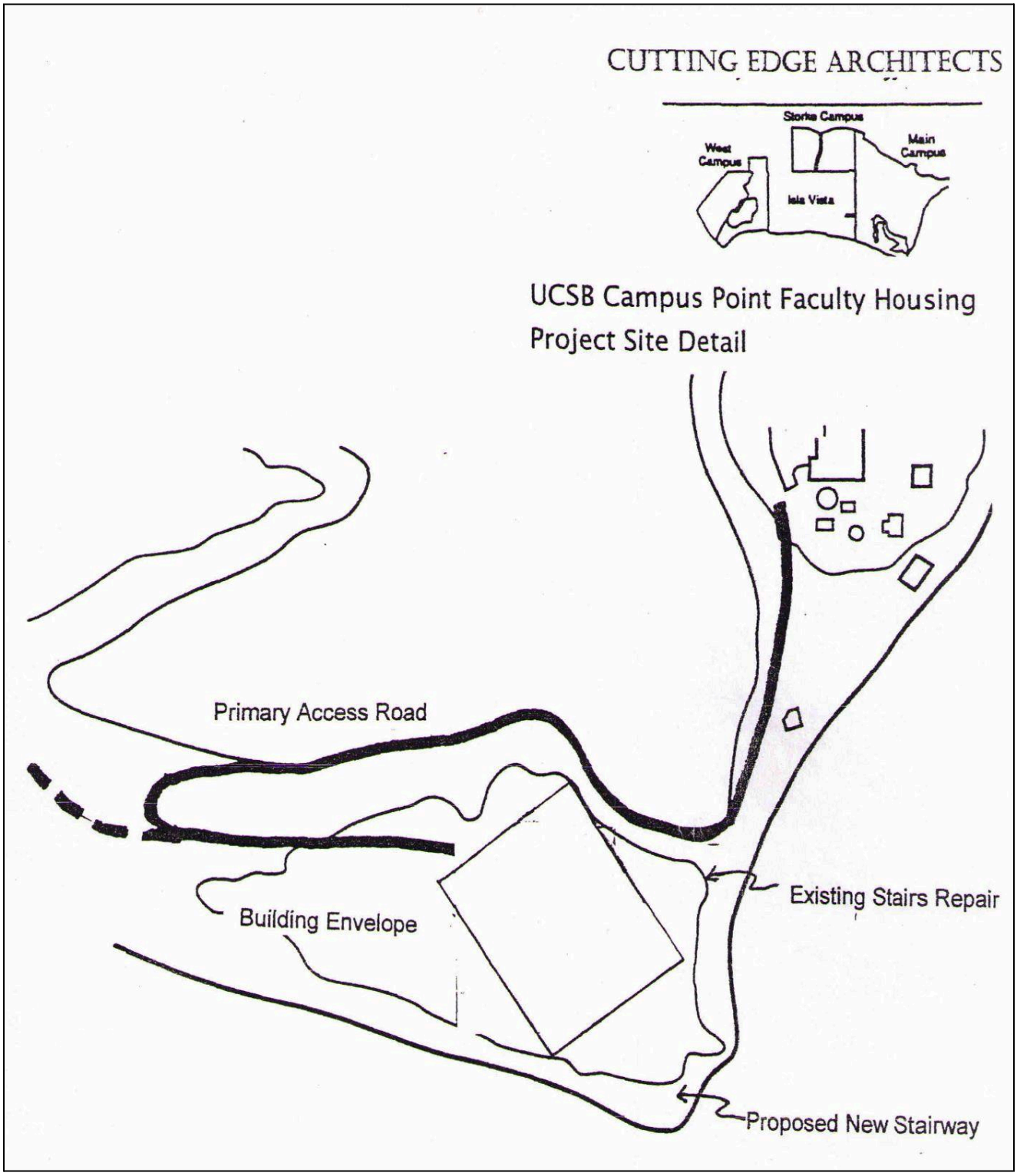

Figure 2-6 Project Site Detail with Building Envelope

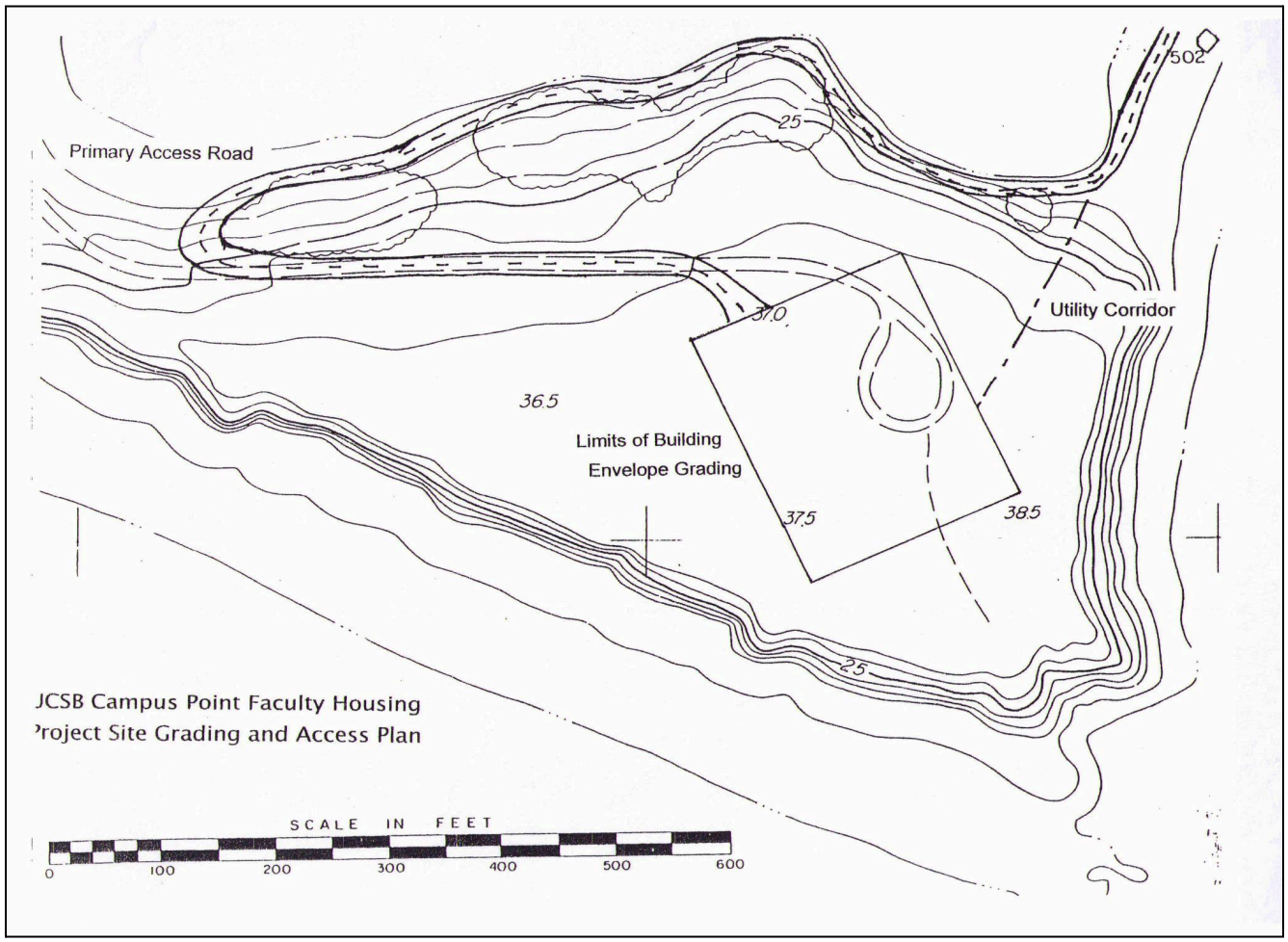

Figure 2-7 UCSB Campus Point Faculty Housing Project Site Grading and Access Plan

2.5 Project Operations

2.5.1 Architecture

The Goleta Point Faculty Housing/Classroom project would feature a three-story structure encompassing approximately 72,752 square feet, with a maximum height of 36 feet. The architectural design would prioritize functionality and integration with the surrounding UCSB campus environment. It is reasonable to assume that the building would use weather-resistant materials suitable for the coastal climate and employ neutral tones to blend with the natural surroundings (see Figure 2-8). As the applicant stated, the building would be similar to those found in Spanish Revival architecture in downtown Santa Barbara consisting of (see Figure 2-11, page 2-12). The first floor would include 9,510 square feet of classroom space and 57 parking spaces, while the second and third floors would house a total of 23 residential units, available as one-, two-, and three-bedroom townhouses (see Figure 2-9, 2-10). The design emphasizes clustered development, minimizing the building footprint to preserve open space.

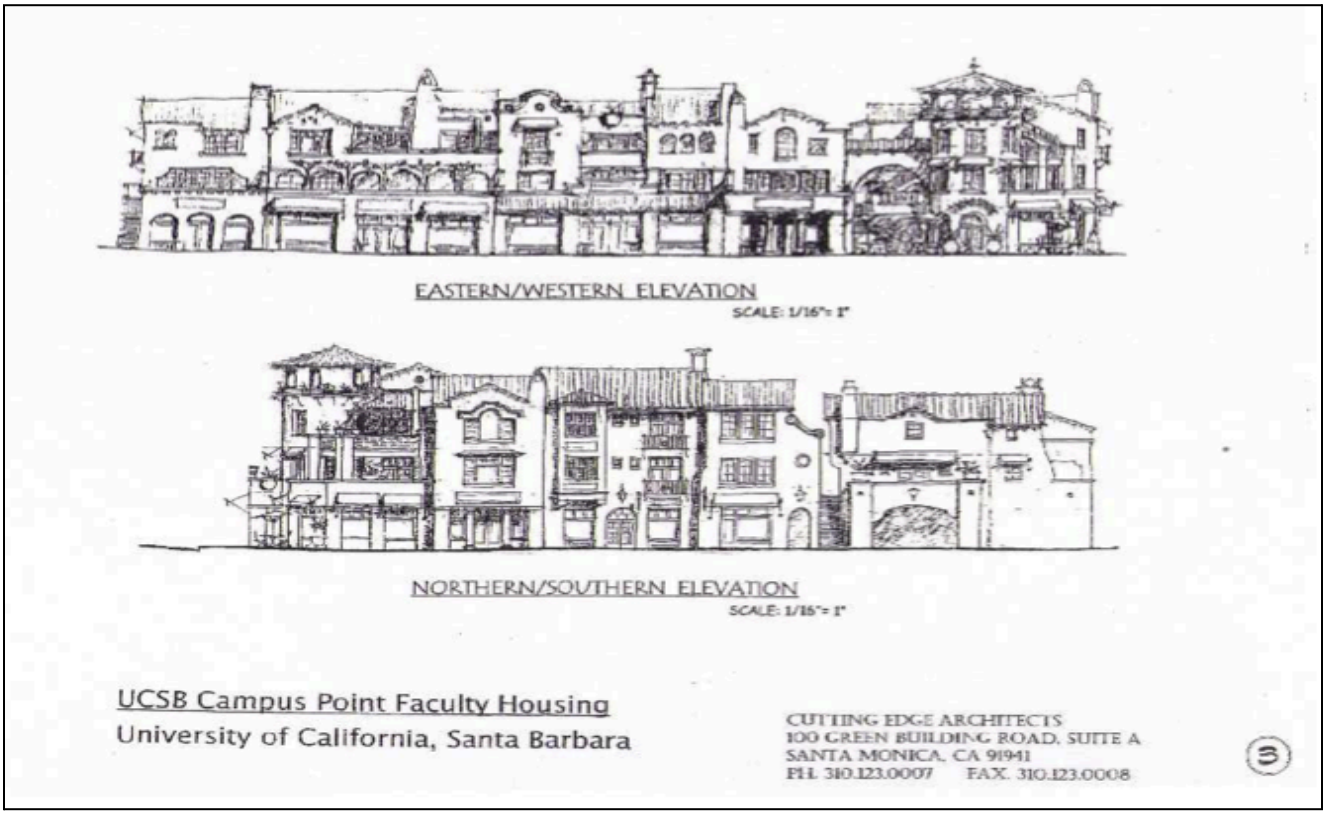

Figure 2-8 UCSB Campus Point Faculty Housing Architectural Elevations

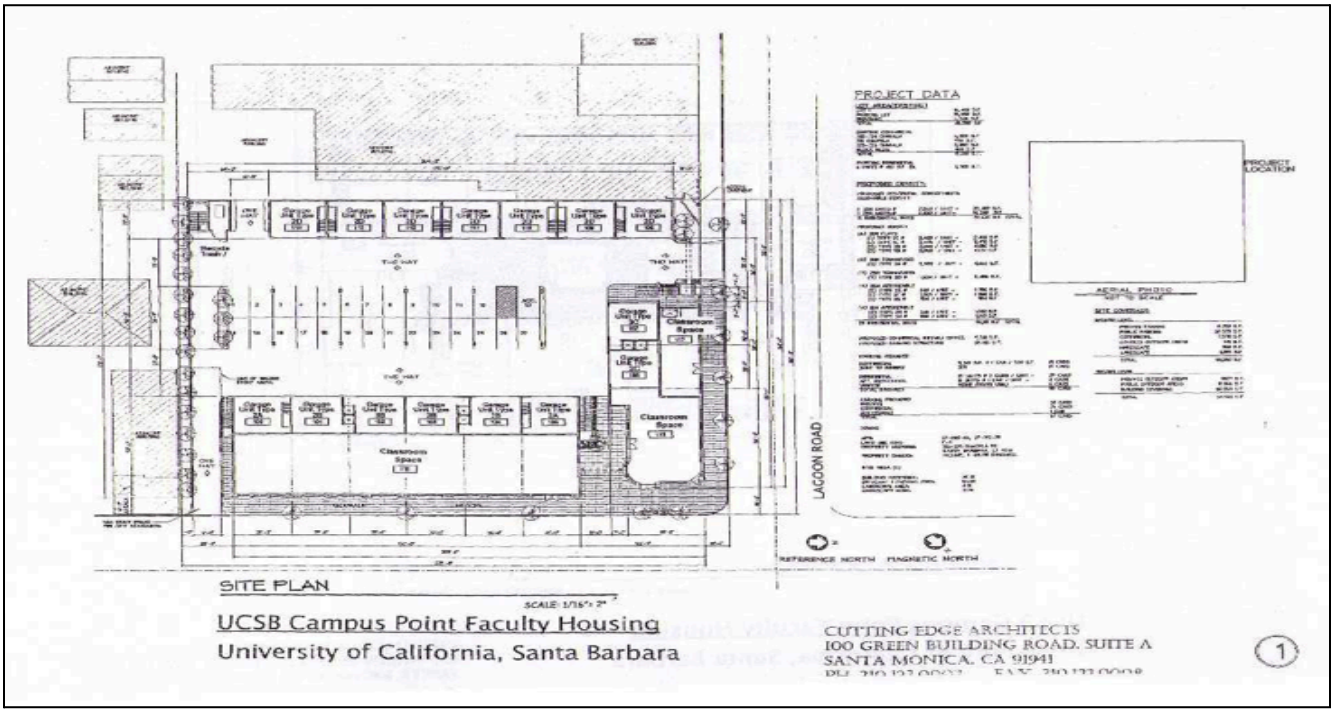

Figure 2-9 UCSB Campus Point Faculty Housing Building Site Plans, First Floor

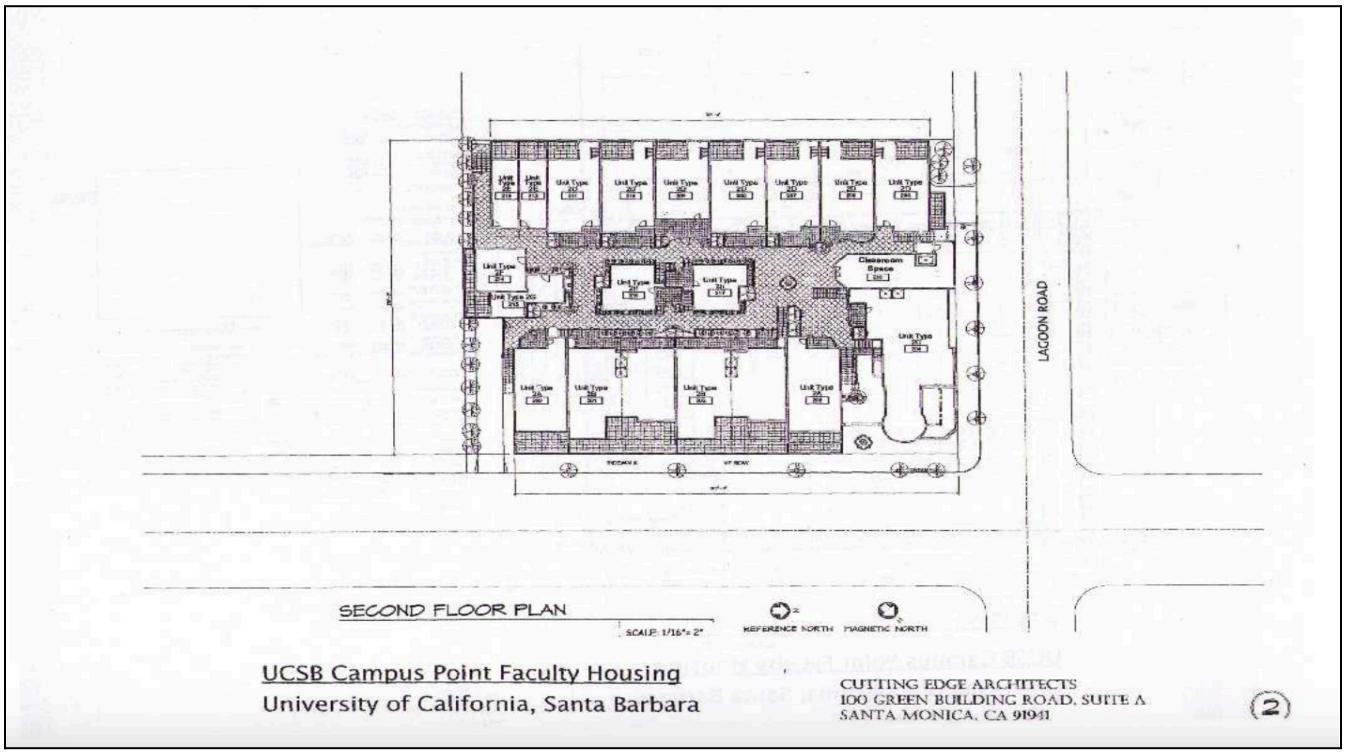

Figure 2-10 UCSB Campus Point Faculty Housing Building Site Plans, Second Floor

Figure 2-11 Spanish Revival Architecture located in Downtown Santa Barbara

Source - https://santabarbaraca.com/itinerary/how-santa-barbara-got-its-spanish-vibe/

2.5.2 Access and Parking Roads

Access to the Goleta Point Faculty Housing/Classroom project would be provided via an upgraded Lagoon Road, expanded to a 30-foot-wide asphalt roadway to ensure safe and efficient entry for vehicles, pedestrians, and bicycles (see Figure 2-6, page 2-9). Based on prior information, it is reasonable to assume that the project would integrate existing campus bike paths and extend pedestrian pathways to connect the site to UCSB's Main Campus, Isla Vista, and nearby recreational trails. Stairways would provide connectivity where grade changes occur, particularly near bluff areas (see Figure 2-6, page 2-9). The project would include 57 parking spaces within a first-floor garage, with a designated handicapped-accessible space. Coastal and bluff-top trails adjacent to the site would remain accessible.

2.5.3 Drainage

The proposed project's drainage system would efficiently manage stormwater runoff while protecting nearby coastal and lagoon ecosystems. It is reasonable to assume that the stormwater would be collected from building rooftops, roadways, and parking areas and conveyed through underground pipelines to existing drainage infrastructure along Lagoon Road (see Figure 2-7, page 2-10). Based on the information provided by the applicant, the proposed Lagoon Road extension would include catch basins and silt traps strategically placed along its length to treat stormwater before it is discharged into surrounding water bodies.

2.5.4 Landscaping

The proposed project's landscaping would be limited, reflecting the compact development footprint and emphasis on clustered residential and educational spaces. The total landscaped area would consist of approximately 1,355 square feet of perimeter shrubbery designed to enhance the site's visual appeal while requiring minimal maintenance. Based on the information provided by the applicant, it is reasonable to assume that the implementation of Canary Island palm (that grows up to 50-80 feet) and Norfolk Island pine (that grows up to 60-80 feet tall) have been considered possible vegetation for landscaping. It was also stated that colorful shrubbery would be used as landscaping to ensure year-round accent blooms. In regards to existing vegetation, the applicant stated that protective measures would be implemented to safeguard nearby existing trees, including fencing around trunks and defining dripline boundaries to prevent disturbance during construction. The landscaping would complement the building design, focusing on low-profile vegetation that integrates with the natural coastal environment without obstructing scenic views or interfering with access to trails.

2.5.5 Utilities

Potential utility service providers for the Goleta Point Faculty Housing/Classroom project are summarized in Table 2-1, page 2-3, and the location of these services is illustrated in Figure 2-7. It is reasonable to assume that the water supply system would connect to existing mains near the Marine Science Institute, and easements along Lagoon Road would support utility installations. All utility lines, including water, sewer, electrical, and telecommunications, would be undergrounded to maintain the site's aesthetic and environmental integrity. It is reasonable to assume that the key components of the utility infrastructure would include water and sewer connections to the Goleta Water District and Goleta West Sanitary District, which already service the area. Along with the current fire hydrant in the proposed project site, it is reasonable to assume that new fire hydrants would be installed along Lagoon Road and strategically placed within 1,500 feet of the residential and classroom facilities to ensure adequate fire response. It is reasonable to assume that these hydrants would connect to the upgraded water infrastructure tied to the Goleta Water District system. Spacing and placement would follow California Fire Code requirements, ensuring proper flow and accessibility for equipment. It is reasonable to

assume that electrical distribution lines, fiber-optic cables, and telecommunications lines would also be routed underground along the upgraded Lagoon Road.

2.5.6 Hours of Operation and Population

The proposed project would serve both residential and educational purposes. The residential component would house approximately 80 UCSB faculty members and their families across 23 townhouse-style units. These units would function as year-round residences, providing convenient on-campus housing for faculty. The classroom component on the building's first floor would operate on a typical academic schedule. It is reasonable to assume that the classes and educational activities are anticipated to occur on weekdays from 8:00 AM to 10:00 PM, supporting UCSB's growing student population and academic needs. It is reasonable to assume that based on typical university class sizes between 25 and 40, approximately 310 to 500 individuals would be transitioning through the project site hourly. Weekend use of the classrooms is not planned but would be accommodated for special academic events or workshops, if necessary. Based on the proposed project's intended operation, it is reasonable to assume that no hazardous materials would be stored or used on-site beyond standard residential and educational supplies.

2.5.7 Lighting

The proposed project would incorporate a thoughtfully designed lighting plan to ensure safety and functionality with minimal environmental impact. Exterior lighting would be limited to essential areas, including pedestrian pathways, parking areas, building entrances, and key access points along Lagoon Road and stairways. It is reasonable to assume that all fixtures would be shielded and directed downward to prevent light spillage and reduce impacts on natural habitats, consistent with California's dark-sky principles and UCSB's sustainability standards. It is reasonable to assume that the parking areas and building entrances would feature soft, downcast lighting designed to provide adequate light without disturbing wildlife. Lighting along the Lagoon Road extension would be minimal, focusing on intersections and utility access areas. No decorative or high-intensity lighting is proposed, ensuring the lighting plan supports safety and usability without compromising the natural aesthetics of the Campus Point area.

2.5.8 Permits Required

The proposed Goleta Point Faculty Housing/Classroom project would require several permits and approvals to ensure compliance with university, state, and local regulations. Since the project site is currently designated as open space under UCSB's Long Range Development Plan (LRDP), an amendment to the LRDP would be necessary to reclassify the area for mixed-use residential and academic purposes. This amendment would need approval from the University of California Board of Regents and the California Coastal Commission. It is reasonable to assume that additional permits from the Goleta Water District for water connection and usage and the Goleta West Sanitary District for sewer service would be required. Also, the Santa Barbara County Fire Department would review and approve fire safety measures, including hydrant placement and emergency access. The project would need to comply with regulations from the United States Army Corps of Engineers due to the lagoon's designation as a navigable water of the United States. It would also require review under the California Coastal Act through the Coastal Commission to ensure adherence to stormwater management standards.

3.0 Biological Resources

This section provides context and background information on the biological resources that would be impacted by the proposed Goleta Point Faculty Housing/Classroom Project. It identifies the project area's key habitats, species, and ecological features and evaluates their sensitivity to potential development activities.

3.1 Regulatory Framework

The proposed project at Campus Point would be subject to several federal and state regulations designed to protect biological resources. These regulations establish standards and guidelines for preserving sensitive habitats and managing potential impacts on species and ecosystems. Although the University of California is not subject to local land use policies due to its status as a state entity, such policies are considered to maintain regional compatibility and minimize cumulative impacts (UCSB, 2008). The most significant regulatory framework for the site is the California Coastal Act, as the project lies within the Coastal Zone. Below, the applicable regulations and their relevance to the project are outlined. Key regulatory frameworks include:

Federal Regulation

- **Endangered Species Act of 1973 (ESA):** The ESA (16 U.S.C. §§ 1531–1544) is administered by the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS). It protects species listed as threatened or endangered and designates critical habitats necessary for survival. The proposed project affecting these species would require consultation and approval to avoid or mitigate impacts.

- **Migratory Bird Treaty Act of 1918 (MBTA):** The MBTA (16 U.S.C. §§ 703–712) protects migratory birds, nests, and eggs. It would apply to numerous bird species that utilize the riparian and lagoon habitats near the proposed project site.

- **Clean Water Act of 1977 (CWA):** The CWA (33 U.S.C. §§ 1251–1387) regulates discharges of pollutants into the United States' waters and protects wetlands and aquatic habitats. Sections 401 and 404 apply if any proposed project activities impact jurisdictional waters, including the Campus Lagoon and the Pacific Ocean.

    - **Section 401 (Water Quality Certification)** applies if the project discharges pollutants or runoff into wetlands or the Campus Lagoon, requiring state water quality certification.

    - **Section 404 (Dredge and Fill Permit)** Applies if any dredging or filling activities impact jurisdictional waters, requiring a permit from the U.S. Army Corps of Engineers.

- **Fish and Wildlife Coordination Act (FWCA):** The FWCA (16 U.S.C. §§ 661–666e) mandates coordination between federal and state agencies when water resource development projects may affect fish and wildlife. Administered by the United States Fish and Wildlife Service (USFWS), the FWCA ensures that wildlife conservation is integrated into water resource planning. For this proposed project, the FWCA would apply to activities that alter aquatic habitats, such as the Campus Lagoon, Pacific Ocean, or seasonal vernal pools, requiring consultation to mitigate impacts on fish and wildlife species.

State Regulation

- **California Endangered Species Act (CESA)**: The CESA was enacted in 1984 and is codified in Fish and Game Code §§ 2050–2098, providing the protection and management of plant and animal species listed as endangered, threatened, or candidates for such listings. Under CESA, State lead agencies are required to consult with the California Department of Fish and Wildlife (CDFW) to ensure that authorized

actions do not jeopardize the survival of listed species or result in the destruction or adverse modification of their essential habitats (Fish and Game Code § 2090).

- **Title 14, Section 670.2**: Includes plants declared endangered, threatened, or rare.
- **Title 14, Section 670.5**: Includes animals declared endangered or threatened.

- **California Species Preservation Act 1970:** Codified in California Fish and Game Code §§ 900–903, provides for the protection and enhancement of California's birds, mammals, fish, amphibians, and reptiles. Administered by the California Department of Fish and Wildlife (CDFW), the Act includes specific provisions for safeguarding several biological resources, including:
    - **Section 3511**: Fully protected birds
    - **Section 4700**: Fully protected mammals
    - **Section 5050**: Fully protected reptiles and amphibians
    - **Section 5515**: Fully protected fish.
- **California Coastal Commission:** The primary state agency responsible for implementing the California Coastal Act (Public Resources Code §§ 30000–30900). Its mandate is to regulate land use and development within the Coastal Zone to protect California's coastal resources, including environmentally sensitive habitat areas (ESHA), public coastal access, and scenic and ecological values. A key section of the California Coastal Act includes;
    - **Section 30240 -** Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (Cal. Pub. Resources Code § 30240)

3.2 Existing Setting

3.2.1 General Overview

The project site is located on the southeast corner of the University of California, Santa Barbara (see Figure 2-3, page 2-5). Under the UCSB Long Range Development Plan (LRDP) (UCSB, 2008), the site is currently designated as an open space within an Environmentally Sensitive Habitat Area (ESHA) (see Figure 2-4, page 2-6). The area predominantly consists of coastal bluff scrub, southern riparian scrub, southern coastal salt marsh, and sandy beaches adjacent to the site, consisting of some of the most diverse ecosystems across the university (see Figure 3-1, page 3-7). The proposed project site is currently undergoing habitat restoration aimed at reintroducing native plant species (see Figure 3-2, page 3-9).

Long Range Development Plan (LRDP)

The UCSB LRDP is the university's General Plan. It guides the university's planned growth inducement effects and the physical improvements needed to accommodate such growth. The LRDP defines habitat types (including ESHA) and identifies related protection policies and mitigations under the university’s standards.

3.2.2 Sensitive Habitats and Vegetation

The project site's vegetation includes three primary habitat types (see Figure 3-1, page 3-6) (see Table 3-1, page 3-5).

Coastal bluff scrub

Southern coastal bluff scrub, recognized as a sensitive habitat by the California Natural Diversity Database (CNDDB) and the California Coastal Commission (CCC), is present within the project site and surrounding areas (see Figure 3-3, page 3-8). This habitat consists of shrubs, herbaceous perennials, and annuals adapted to coastal conditions such as constant winds with high salt and moisture content. Vegetation density at the site varies with topography and historical disturbance. Dominant native species include coyote brush (*Baccharis pilularis*), lemonade berry (*Rhus integrifolia*), and goldenbush. At the same time, non-native species such as Kikuyu grass (*Pennisetum clandestinum*) and Hottentot fig (*Carpobrotus edulis*) have also been established in the proposed project area. The southern coastal bluff scrub at the project site contributes to its designation as ESHA under UCSB's LRDP (UCSB, 2008).

Southern riparian scrub

Southern riparian scrub, a sensitive habitat recognized by the CNDDB and often classified as a wetland under CCC guidelines, is present to the north and along the proposed road at the project site (UCSB, 2008) (For the proposed road, please see Figure 2-6, page 2-8). This habitat typically consists of tall, open, broad-leafed, winter-deciduous vegetation along streams and drainage areas. Key native species include arroyo willow (*Salix lasiolepis*), black cottonwood (*Populus balsamifera* ssp. *trichocarpa*), Fremont cottonwood (*Populus fremontii*), and western sycamore (*Platanus racemosa*) (UCSB, 2008). This habitat provides critical ecological functions such as erosion control, water filtration, and habitat for native bird species.

Southern Coastal Salt Marsh

Southern coastal salt marsh, a sensitive habitat recognized by the CNDDB and often classified as a wetland under CCC and U.S. Army Corps of Engineers (ACOE) guidelines, is present to the north and along the proposed road at the project site (see Figure 2-6, page 2-8). This habitat is dominated by salt-tolerant (halophytic) plant species that thrive in lagoons and estuaries. Species such as pickleweed (*Salicornia virginica*), saltgrass (*Distichlis spicata*), and alkali heath (*Frankenia grandifolia*) are characteristic of this habitat, along with other plants, including willows, brass buttons (*Cotula coronopifolia*), and alkali rye (*Leymus triticoides*).

3.2.3 Wildlife Species

The project site and its surrounding habitats support diverse wildlife, as identified in the UCSB LRDP (UCSB, 2008). The Campus Lagoon and adjacent coastal bluff scrub, southern riparian scrub, and southern coastal salt marsh provide critical foraging, nesting, and roosting opportunities for many species.

Species in Coastal Scrub

Many wildlife species at the project site and surrounding areas utilize various habitat types as foraging areas or migration corridors, both seasonally and infrequently. Common species documented in these areas include the California ground squirrel (*Spermophilus beecheyi*), brush rabbit (*Sylvilagus bachmani*), Botta's pocket gopher (*Thomomys bottae*), mourning dove (*Zenaida macroura*), American crow (*Corvus brachyrhynchos*), mallard duck (*Anas platyrhynchos*), and scrub jay (*Aphelocoma coerulescens*) (UCSB, 2008). However, it is essential to note

that these species are well-adapted to multiple habitat types and thrive in the mix of natural and managed ecosystems across the project site

Species in Marsh/Riparian

Riparian and wetland habitats near the Campus Lagoon and surrounding southern riparian scrub provide suitable environments for a diverse range of semi-aquatic and terrestrial wildlife. Vertebrate species commonly observed in these habitats include the common garter snake (*Thamnophis sirtalis*), Virginia opossum (*Didelphis virginiana*), striped skunk (*Mephitis mephitis*), raccoon (*Procyon lotor*), and California quail (*Callipepla californica*) (UCSB, 2008). Bird species in these habitats also include the American goldfinch (*Carduelis tristis*) (UCSB, 2008).

The vegetation in riparian and wetland areas has been considered particularly important for nesting, roosting, and foraging habitats for migratory songbirds. Common species utilizing this vegetation include the Pacific-slope flycatcher (*Empidonax difficilis*), warbling vireo (*Vireo gilvus*), Bewick's wren (*Thryomanes bewickii*), and Wilson's warbler (*Wilsonia pusilla*) (UCSB, 2008). These habitats contribute to the ecological diversity of the project site and emphasize the need to preserve sensitive resources during development.

3.2.4 Sensitive Species

Sensitive Wildlife Species

It is reasonable to assume that the project site and surrounding areas support several species identified as sensitive, including those listed under federal and state regulations, species of special concern, and those relying on designated critical habitats. These species are protected through compliance with the Endangered Species Act (ESA), California Endangered Species Act (CESA), and UCSB's Long Range Development Plan (LRDP) (see Table 3-2, page 3-6).

Sensitive Plant Species

The current site location encompasses coastal bluff scrub, southern saltwater marsh, and southern riparian habitat, supporting several sensitive plant species integral to the area's ecological health. In the coastal bluff scrub, key species include;

- seacliff buckwheat (*Eriogonum parvifolium*), a critical resource for pollinators;
- bush lupine (*Lupinus arboreus*), which stabilizes soils and enhances nitrogen levels;
- California sagebrush (*Artemisia californica*) is the dominant shrub providing cover and forage for local wildlife;
- Coyote brush (*Baccharis pilularis*) outcompetes invasive grasses and other non-native plants, promoting native biodiversity and improving overall habitat quality.

Table 3-1 Habitat and Vegetation in Proposed Project Site

Classification	Habitat	Vegetation in Habitat	Ecological Value
Common Community	Coastal Bluff Scrub	- Coyote brush (*Baccharis pilularis*) (see Figure 3.4, page 3-8) - California sagebrush (*Artemisia californica*) - Sticky monkeyflower (*Mimulus aurantiacus*) - Poison oak (*Toxicodendron diversilobum*) - Black sage (*Salvia melifera*)	Stabilize soils along the bluff and provide habitat for native birds and small mammals
Sensitive Community	Southern Riparian Scrub	- Arroyo willow (*Salix lasiolepis*) - Mulefat (*Baccharis salicifolia*) - Red willow (*S. laevigata*) - Freemont Cottonwood (*Populus freemontii*) - Small western sycamore (Pl*atanus racemosa*) - Mugwort (*Artemisia douglasiana*)	Provides critical ecological functions, including water filtration and habitat for nesting birds
Sensitive Community	Southern Coastal Salt Marsh	- pickleweed (*Salicornia virginica*) - saltgrass (*Distichlis spicata*), - alkali heath (*Frankenia grandifolia*) - brass buttons (*Cotula coronopifolia*) - alkali rye (*Leymus triticoides*)	Plays a critical role in supporting biodiversity, filtering water, and providing foraging and nesting sites for wildlife
Common Community	Non-Native (Invasive) Grasslands	- Wild oats (*Avena fatua*) - Ripgut Brome (*Bromus diandrus*) - Sea Rocket (*Cakile maritima*) - Ice Plant (*carpobtorus edulis*) (see Figure 3-5, page 3-9)	Offers limited ecological value
*Restoration Area	Coastal Bluff Scrub Restoration Area	- Seacliff buckwheat (*Eriogonum parvifolium*) - Distant Scorpion Weed (*Phaceliadistans*) - California Sagebrush (*Artemisia californica*) - Coyote brush (*Baccharis pilularis*) - California figwort (*Scrophularia californica*) - Branching Pacelia (*phacelia ramosissima*) (see Figure 3.6, page 3-10)	To revitalize degraded ecosystems and steward them to get them as close to their original functioning state as possible.

Source: (UCSB, 2008)

Table 3-2 Sensitive Wildlife Species Near Campus Point

Species	Habitat Use	Special Status in California
Great Blue Heron (*Ardea herodias*)	Nesting, roosting, foraging in riparian vegetation	Species of Special Concern
California Thrasher (*Toxostoma redivivum*)	Nesting, roosting, foraging in riparian vegetation	Species of Special Concern
White-tailed Kite (*Elanus leucurus*)	Nesting, roosting, foraging in riparian vegetation	Fully protected by CDFG- no take allowed
Snowy Egret (*Egretta thula*)	Nesting, roosting, foraging in riparian vegetation	Species of Special Concern
Monarch Butterfly (*Danaus plexippus*)	Roosting in eucalyptus and cypress trees during winter	Sensitive Species

Source: (UCSB, 2008)

Table 3-3 Sensitive Wildlife Species

Species Name	Legal Status Federal/State	Habitat Requirements
Agelaius tricolor Tricolored blackbird	--/CSC	Freshwater marshes and streams with dense bulrush, cattails, blackberry thickets, willows, etc., throughout much of California.
Athene cunicularia Burrowing owl	--/CSC	Grassland, open savannah or scrub habitats throughout California.
Cicindela hirticollis gravida Sandy beach tiger beetle	--/SA	Sandy beach habitats in coastal areas of California.
Charadrius alexandrinus nivosus Western snowy plover	FT/CSC	Sandy beaches, salt pond levees, and shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.
Circus cyaneus Northern harrier	--/CSC	Frequents meadows, grasslands, fresh and saltwater emergent wetlands. Permanent resident in coastal areas.
Coelus globosus Globose dune beetle	--/SA	Sandy beach habitats in coastal areas of California.
Danaus plexippus Monarch butterfly	--/CSC	Winter roost sites consist of wind-protected tree groves such as eucalyptus, pine, and cypress forest near the coast.
Elanus leucurus White-tailed kite	--/FP	Open grasslands, meadows, or marshlands for foraging close to isolated dense-topped trees for nesting and perching.
Eremophila alpestris actia California horned lark	--/CSC	Short grass prairie, bald hills, mountain meadows, open coastal plains, fallow grain fields, alkali flats.
Euclyclogobius newberryi Tidewater goby	FE/CSC	Shallow lagoons and mouths of coastal streams with brackish water.
Lanius ludovicianus Loggerhead shrike	--/CSC	Grassland, savannah, open woodlands, desert riparian habitats throughout California.
Passerculus sandwichensis beldingi Belding's savannah sparrow	--/SE	Coastal salt marshes from Santa Barbara County to the Mexican border.
Pelecanus occidentalis californicus California brown pelican	FT/CSC	Open nearshore waters along the coast of California and Mexico.
Sterna antillarum California least tern	FE/SE,FP	Coastal California in abandoned salt ponds, sandy beaches, and estuarine shores.
Toxostoma redivivum California thrasher	--/CSC	Found along the coastal slope of California, in dune scrub, coastal sage scrub, and chaparral habitats.
General references: CDFG 2007, Zeiner 1990, United States Fish and Wildlife Service 2007, Stebbins 2003		
STATUS CODES FE: federally endangered FT: federally threatened		SE: state endangered ST: state threatened CSC: California species of special concern FP: fully protected by CDFG-no take allowed SA: CNDDB special animal (former FSC)

Source: (UCSB, 2008)

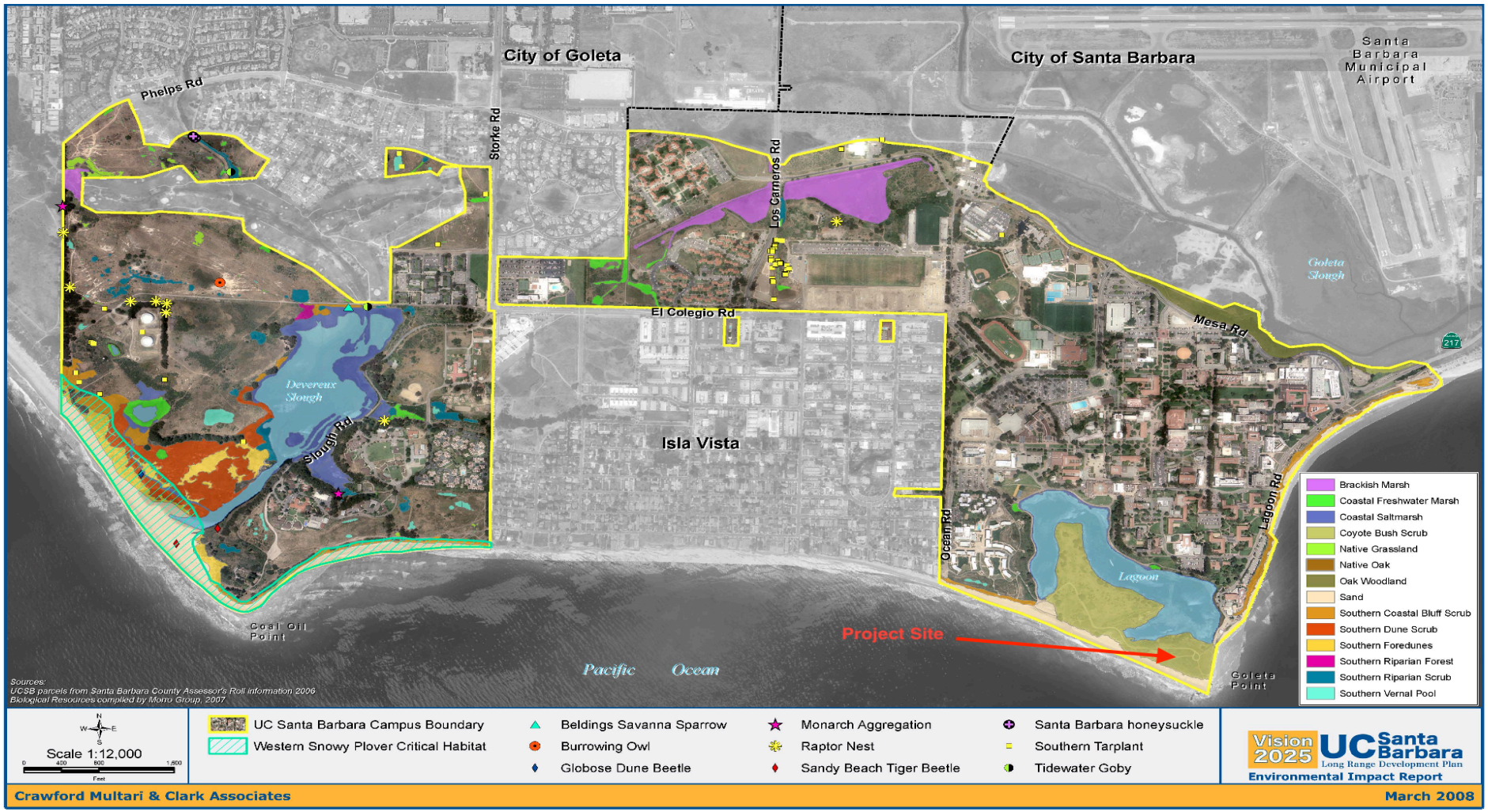

Figure 3-1 Sensitive Biological Resources Near Proposed Project **Source: (UCSB, 2008)**

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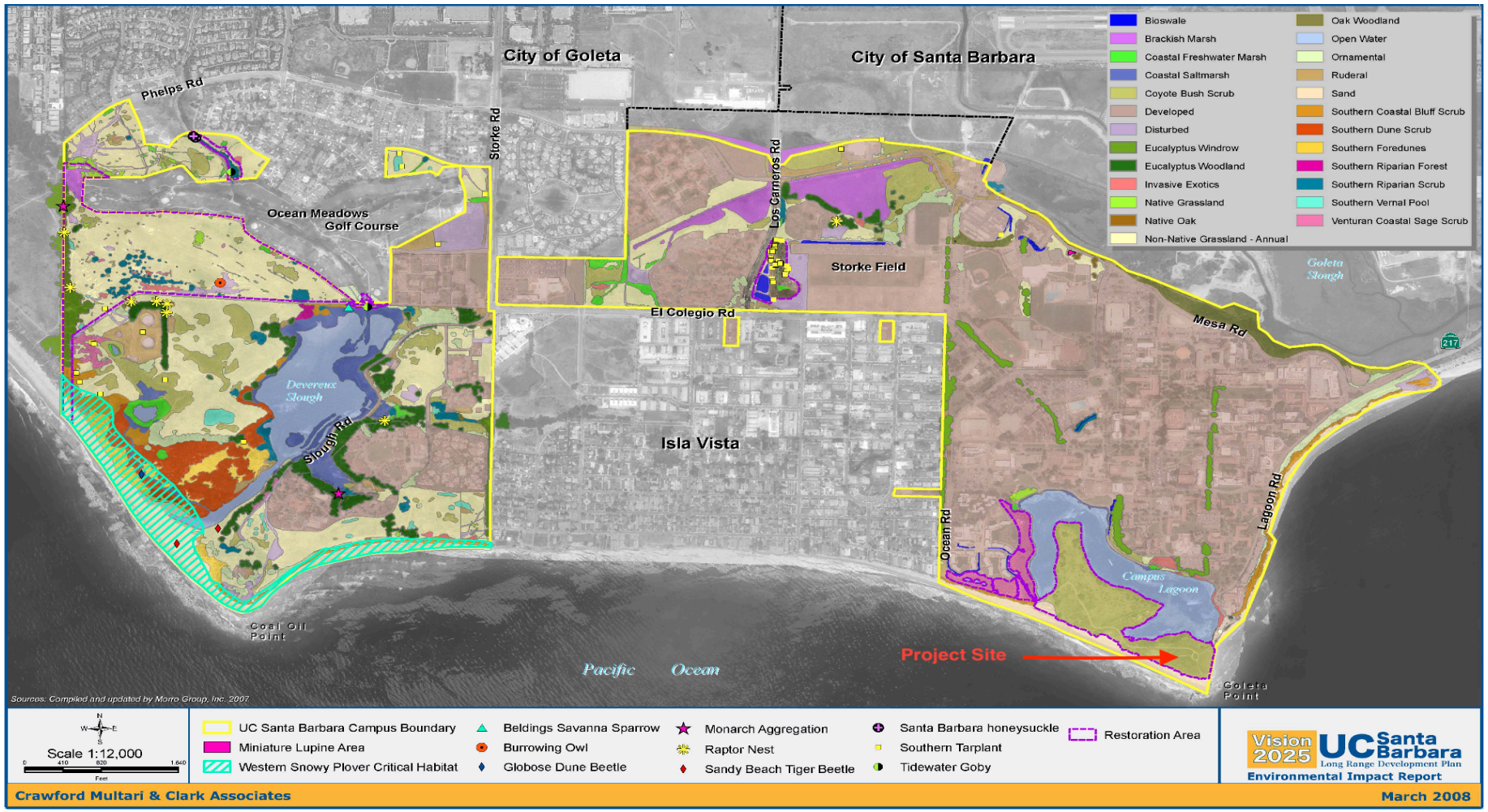

Figure 3-2 Overview of Biological Resources Near Proposed Project **Source: (UCSB, 2008)**

Figure 3-3 Current Restoration Location Within Proposed Project Envelope, Looking North (01/25/2025)

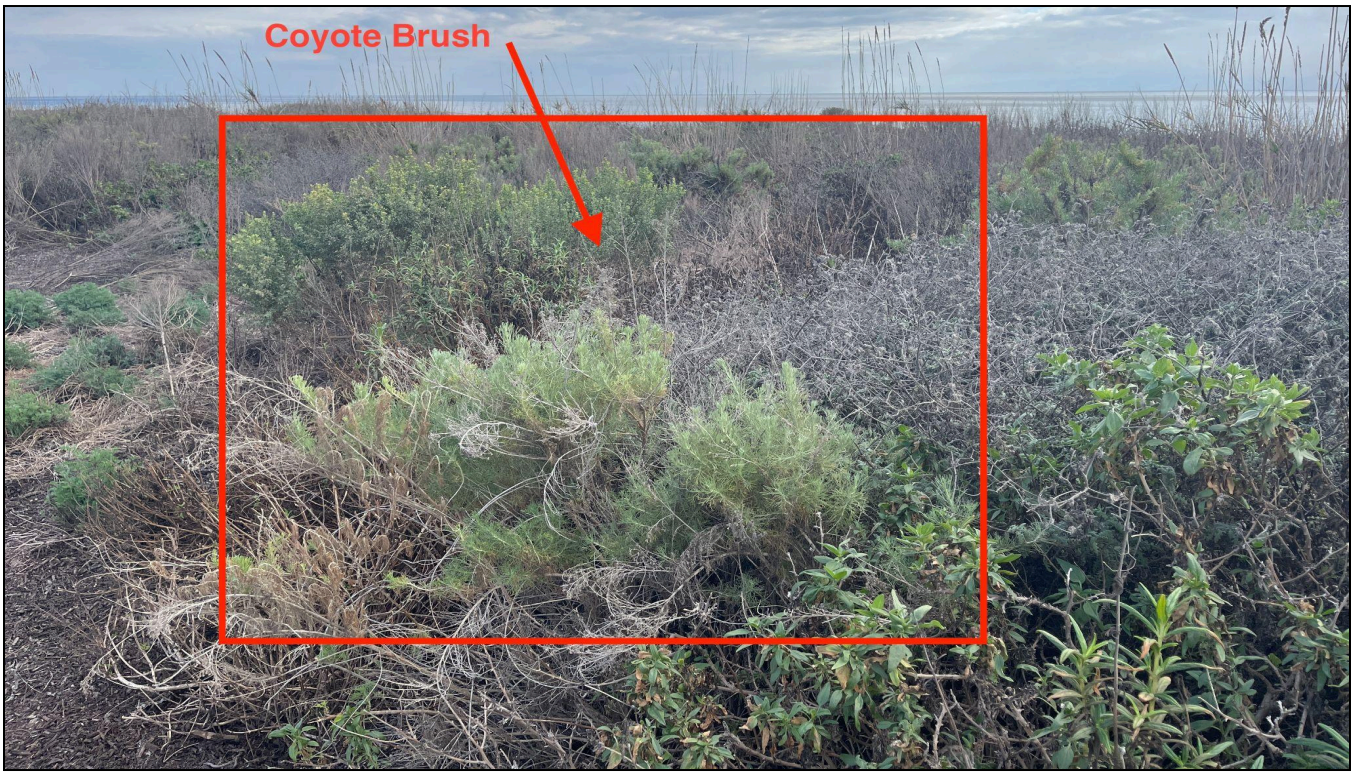

Figure 3-4 Native Coyote Brush in Proposed Project Location, Looking South (01/25/2025)

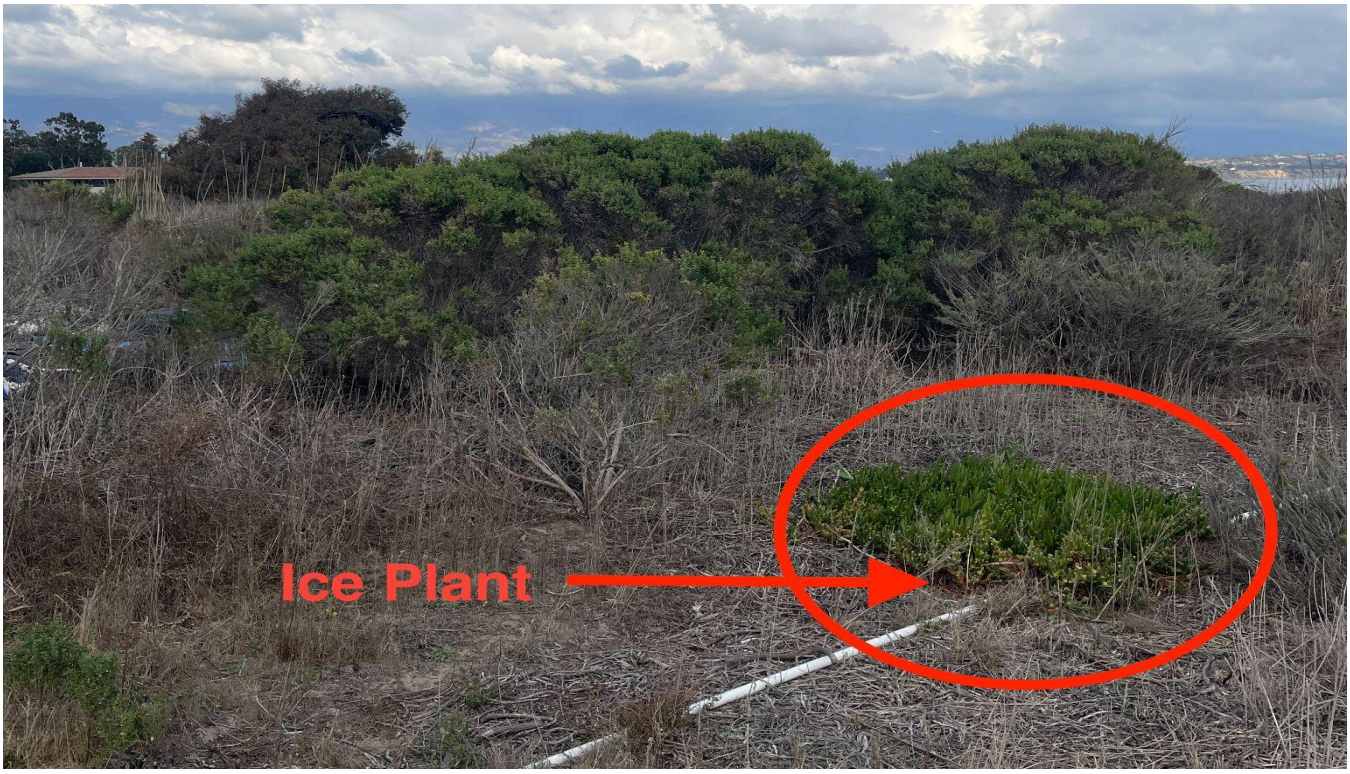

Figure 3-5 Invasive Ice Plant Near Coyote Brush in Proposed Project Site, Looking North (01/25/2025)

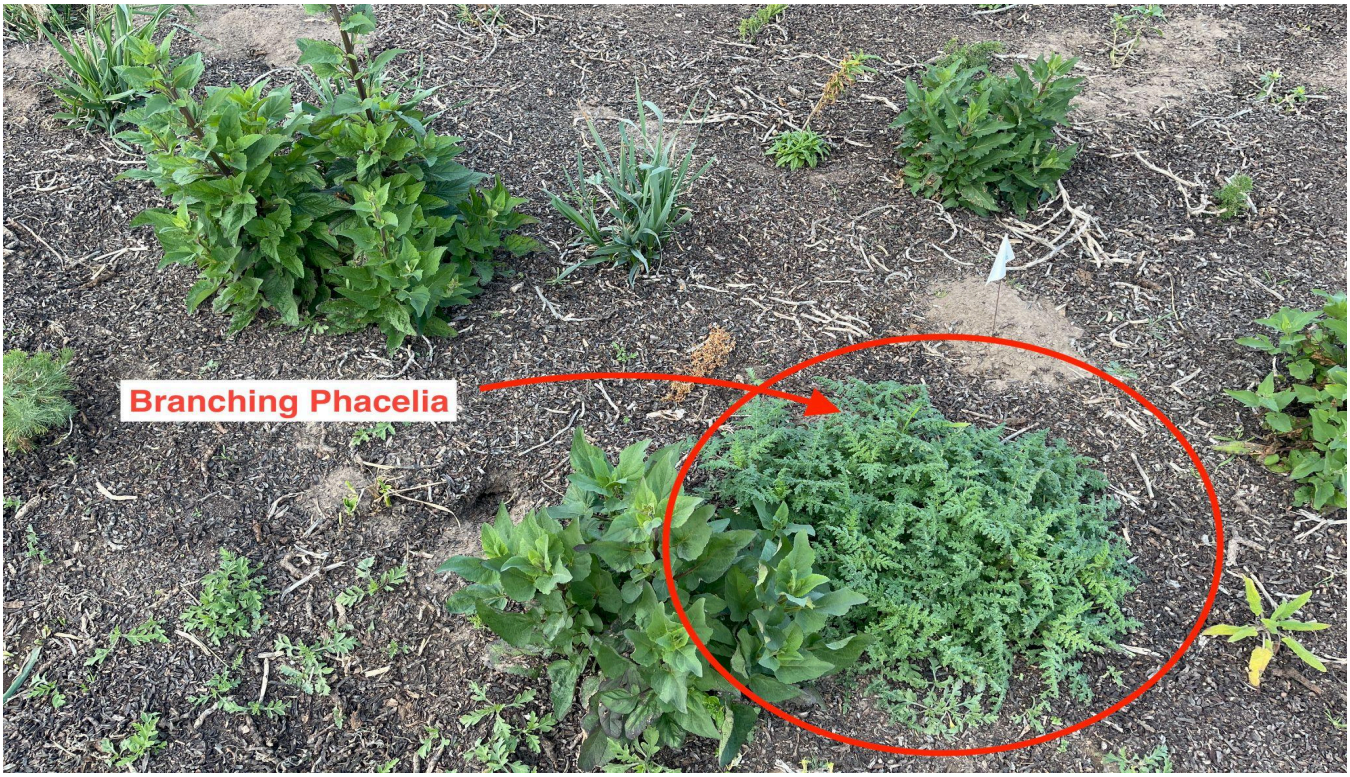

Figure 3-6 Native Plant Restoration (Branching Phacelia) In Proposed Project Site (01/25/2025)

3.3 Special Problem Areas

The proposed project site at Campus Point and its surrounding ESHA include several special problem areas identified in the UCSB LRDP. These issues primarily involve ecological sensitivity, coastal erosion, habitat fragmentation, and human disturbance.

3.3.1 Coastal Erosion

Coastal erosion is a critical concern along Campus Point's bluffs and sandy beach areas. The LRDP identifies this region as highly susceptible to bluff retreat due to natural processes such as wave action, wind, storm surge, and rising sea levels associated with climate change. On average, the coastal bluff erodes at a rate of a foot per year. Erosion threatens ecosystem stability and poses risks to existing habitats and species of special concern since the area is constantly being reduced to smaller areas yearly.

3.3.2 Existing Human Disturbance

As observed in an independent site visit on January 13th, 2025, students, faculty, and the public frequently recreationally use the trails and beach areas, resulting in localized habitat degradation. Activities such as off-trail hiking, beach access during snowy plover nesting season, and littering disturb sensitive areas. These trails and remnants of WWII infrastructure have contributed to habitat fragmentation and the introduction of invasive plant species. Many of the trails within the project envelope are not official and are unregistered in the UCSB LRDP (see Figure 3-7). These still raise notable concerns since they are close to the project site and would continue to disturb the land/condition of the habitat nearby. The LRDP emphasizes the importance of habitat restoration to address these impacts, including managing invasive species and re-establishing native vegetation in sensitive areas.

3.3.3 Habitat fragmentation

The presence of unpaved trails, remnants of WWII infrastructure, and invasive plant species has contributed to the fragmentation of coastal bluff scrub and riparian habitats. Habitat fragmentation disrupts wildlife corridors, reduces the availability of nesting and foraging areas, and impairs overall ecosystem function. Restoration efforts outlined in the LRDP focus on removing invasive species and re-establishing native vegetation to improve connectivity and enhance ecological integrity.

3.3.4 Ongoing Habitat Restoration Efforts

The proposed project site is undergoing active habitat restoration within the building envelope (see Figure 2-6, page 2-8). The restoration focuses on reintroducing small native plant species that are well-distributed across the area (see Figure 3-3, page 3-9). This effort aims to improve habitat quality and ecological function by replacing invasive vegetation with native species. Examples of plants being reestablished include seacliff buckwheat (*Eriogonum parvifolium*), distant scorpion weed (*Phacelia distans*), California sagebrush (*Artemisia californica*), coyote brush (*Baccharis pilularis*), branching phacelia (phacelia ramosissima) (see Figure 3-6, page 3-11), and California figwort (*Scrophularia californica*). These plants attract butterflies, bees, and other insects, contributing to the health and functionality of the surrounding areas. These activities are part of UCSB’s broader commitment to preserving and enhancing coastal habitats, as outlined in its LRDP (UCSB, 2008). Efforts like these support local biodiversity, stabilize sensitive soils, and demonstrate the importance of proactive habitat restoration in maintaining regional ecological balance.

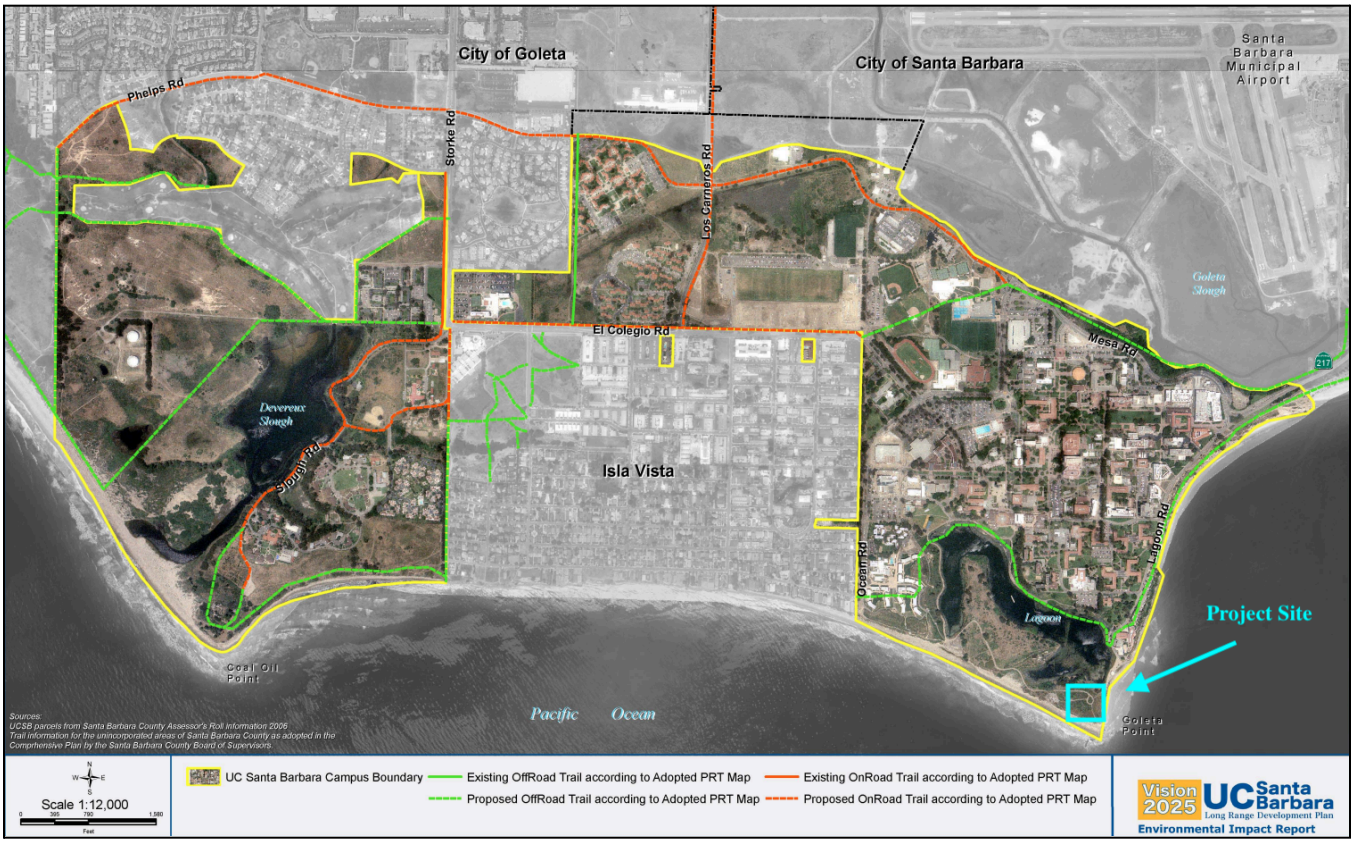

Figure 3-7. Current Trails Used for Recreational Activities **Source: (UCSB, 2008)**

4.0 Impact Assessment

This section evaluates the potentially significant impacts of the proposed project on biological resources during construction and operation based on the *Santa Barbara County Environmental Thresholds Manual* and relevant *CEQA Appendix G* significance criteria. The analysis considers site-specific biological conditions, including habitat types, sensitive species, and existing restoration efforts, to determine whether the project would have adverse effects.

4.1 Significance Criteria

California Environmental Quality Act (CEQA) Guidelines Appendix G. Under Appendix G of the CEQA Guidelines, the project would result in a significant, unavoidable impact on biological resources if it;

- Has 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS).

- Interferes substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

County of Santa Barbara Planning and Development: Environmental Thresholds and Guidelines Manual defines the significance thresholds as follows:

- Substantially affect a rare or endangered species of animal, plant, or the habitat of the species.

Types of Impacts to Biological Resources. Disturbance to habitats or species would be considered significant, based on substantial evidence in the record (not public controversy or speculation), if they substantially impact significant biological resources in any of the following ways:

- Substantially limit reproductive capacity through the loss of individuals or habitat.

4.2 Project Impacts

The potential impacts on the biological resources resulting from the proposed project construction and long-term operation uses are discussed below.

4.2.1 Project Construction

Impact BIO-1: Vegetation removal from construction activities, such as grading, within the project site would result in the loss of southern coastal bluff scrub, southern coastal salt marsh, and southern riparian scrub. Removing these plant communities would affect rare or endangered plant species within a designated ESHA under the UCSB LRDP, resulting in a potentially significant short-term impact on biological resources.

Southern coastal bluff scrub, southern coastal salt marsh, and coastal riparian habitat would be lost during the initial phases of site preparation. This would include grading, vegetation clearing, earthmoving, and soil compaction across the project envelope (see Figure 2-6, page 2-8). Given the scale of development, it is reasonable to assume a worst-case scenario where vegetation removal would occur in all designated construction zones simultaneously rather than in phases, resulting in the immediate and large-scale loss of habitat. It is reasonable to assume that habitat loss would be most significant in the site's southern portion, where coastal bluff scrub communities would be permanently cleared to accommodate residential units, classrooms, and supporting infrastructure (see Figure 4-1, page 4-6). Seacliff buckwheat and California sagebrush provide essential resources for pollinators, ground-nesting birds, and small mammals.

Riparian vegetation along the northern boundary of the project site, adjacent to the proposed access road near the Campus Lagoon (see Figure 2-6, page 2-8), would be removed, reducing vegetation cover within the project footprint (see Figure 4-2, page 4-6). It is reasonable to assume a worst-case scenario that grading activities, which would involve cutting and filling approximately 6,000 cubic yards of soil, would disturb root structures, eliminating the potential for natural vegetation regrowth and reducing the viable habitat available to wildlife species dependent on these plant communities. Vegetation removal would occur along access roads and areas designated for underground utilities, reducing approximately 35% of the habitat within the construction zone (see Figure 2-7 page 2-9 and Figure 4-3 page 4.7).

It is reasonable to assume a worst-case scenario of construction lasting 18 to 24 months, with site preparation and grading occurring in the first 6 to 9 months. While construction is anticipated to begin in the dry season (spring/summer), delays or scheduling constraints would extend vegetation removal into the wet season (fall/winter), further prolonging habitat disturbance. It is reasonable to assume a worst-case scenario that construction would take place five days a week from 7:00 AM to 7:00 PM, with occasional weekend work, intensifying disturbance to existing vegetation within the project limits.

Removing southern coastal bluff scrub and riparian habitat would permanently eliminate existing plant communities within the project footprint and would substantially eliminate species diversity or abundance. Removing dense vegetation would result in a loss of available nesting sites, meeting the threshold for substantially reducing the quantity or quality of nesting areas. Additionally, removing native plant species within the project footprint would eliminate seed sources necessary for vegetation regeneration, resulting in substantially limiting reproductive capacity.

The project also meets CEQA Appendix G Section IV(a) significance criteria, as it would **substantially impact a sensitive plant community and riparian habitat through direct removal and habitat modifications.** Also, its classification of ESHA conflicts with any local policies or ordinances protecting biological resources.

Therefore, these activities of the proposed project would result in a significant impact on biological resources through the removal of vegetation (Class I).

Impact BIO-2: Construction activities such as grading and excavating would result in the loss of nesting habitat for avian species, resulting in a potentially significant short-term impact.

Grading and excavating would include vegetation removal and tree clearing within the project site, which would result in the loss of nesting habitat for avian species, including migratory birds and raptors (see Figure 4-4, page 4-8). It is reasonable to assume that based on a worst-case scenario, the removal of trees and large vegetation would directly impact species that rely on the project site’s southern coastal bluff scrub and riparian habitat for breeding, nesting, and foraging (see Figure 4-3, page 4-8). Sensitive and special-status bird species have been documented in the area and would be affected by the loss of suitable nesting habitat. These include the

white-tailed kite (*Elanus leucurus*), a fully protected species under California Fish and Game Code Section 3511, and the great blue heron (*Ardea herodias*) and snowy egret (*Egretta thula*), both considered species of special concern in California (UCSB, 2008). Additionally, the project site provides important nesting and roosting habitat for the California thrasher (*Toxostoma redivivum*), a species that depends on dense vegetation for shelter and breeding success (UCSB, 2008). Removing these nesting resources during the development phases of the projection would result in a potentially significant impact on biological resources.

Nesting habitat removal would occur during the initial phases of site preparation and grading, including clearing trees, large shrubs, and other mature vegetation across the project footprint (see Figure 4-4, page 4-8). Given the scale of development, it is reasonable to assume a worst-case scenario where tree removal would occur in all designated construction zones where activity would be inescapable. The northern portion of the project site along the lagoon, which contains a dense tree line with tall vegetation, would experience the most substantial loss of nesting resources, as these areas support tree-nesting raptors and ground-nesting birds (see Figure 4-4, page 4-8). Based on an independent site visit conducted on January 13th, 2025, it was recorded that approximately 30-40 trees ranging from 10-40 feet would be within the project development envelope and would need to be removed for the proposed access road to be built (see Figure 4-4, page 4-8). It is reasonable to assume a worst-case scenario that tree removal and vegetation clearing would take place during the breeding season (February–August) when birds are actively nesting (CDFW, 2022). This would directly impact nesting birds, including nest abandonment and disruption of breeding cycles. Additionally, nesting birds displaced from the project site would be unable to find suitable alternative habitats nearby, reducing reproductive success.

It is reasonable to assume a worst-case scenario that construction is anticipated to last 18 to 24 months, with site preparation and grading occurring in the first 6 to 9 months. While tree removal is expected to occur during initial site clearing, delays or scheduling constraints would extend tree removal into peak nesting periods, increasing the likelihood of disturbance. It is reasonable to assume a worst-case scenario that construction would take place five days a week from 7:00 AM to 7:00 PM, with occasional weekend work, increasing noise and human activity within the project footprint, further discouraging birds from nesting or re-nesting in the vicinity.

The project meets the significance criteria of the *County of Santa Barbara Planning and Development: Environmental Thresholds and Guidelines Manual*, **as it would substantially affect a rare or endangered species of animal, plant, or habitat of the species.**

Therefore, the proposed project would result in a potentially significant impact on biological resources, specifically avian species, by removing key habitats (Class I).

4.2.2 Long-Term Project Operations

Impact BIO-3: Long-term operations, including the introduction of permanent structures, roadways, and lighting from the proposed project, would disturb the migratory corridors and foraging behavior of the White-tailed Kite (*Elanus leucurus*), California Thrasher (*Toxostoma redivivum*), and Monarch Butterfly (*Danaus plexippus*).

Long-term operation of the proposed project would result in a potentially significant disruption of wildlife movement and migratory corridors within and around the project site. Introducing permanent structures, roadways, artificial lighting, and human activity would create physical and behavioral barriers. The structures would restrict wildlife access to foraging, breeding, and sheltering areas, substantially interfering with the movement of native residents and migratory wildlife species. The white-tailed kite, California thrasher, and monarch butterfly are sensitive, endangered, or of special concern, meaning that the disruption of movement

corridors would fragment habitats, reduce genetic exchange, and limit access to food sources. Additionally, altering established wildlife corridors would substantially diminish habitat for fish, wildlife, and plants, further enhancing long-term biological impacts.

It is reasonable to assume a worst-case scenario in which the project would permanently develop approximately 20% of the existing sensitive habitat of coastal bluff scrub (see Figure 2-7, page 2-9), reducing the available habitat for species that depend on this vegetation for shelter, foraging, and nesting. The newly paved access road would introduce a strict physical boundary, restricting movement between open space areas and the lagoon. It is reasonable to assume a worst-case scenario that the road would occupy approximately 80% of the southern boundary of the Campus Lagoon (see Figure 2-6, page 2-8), creating a high-traffic barrier that many species would be deterred from crossing. The white-tailed kite, California thrasher, and monarch butterfly traversing the site to access the Campus Lagoon, coastal bluff scrub, and adjacent open spaces would face increased difficulty navigating between habitats. The obstruction of movement corridors would substantially fragment, eliminate, or otherwise disrupt foraging areas and access to food sources, particularly for migratory birds, small mammals, and pollinators that depend on connectivity between habitat patches.

Artificial lighting would further exacerbate the disruption of nocturnal wildlife activity, particularly for mammals, amphibians, and birds that rely on dark conditions for foraging and breeding. It is reasonable to assume a worst-case scenario in which nighttime activity levels among wildlife would decrease by approximately 50% due to the introduction of intrusive lighting in an area that was previously undeveloped and uninhabited. This would substantially reduce species diversity or abundance by discouraging wildlife from utilizing habitat near the project site, leading to population displacement. Species such as owls, bats, and small mammals that depend on the project site for prey hunting, movement, and nesting would be disproportionately affected.

It is reasonable to assume that introducing new artificial barriers leading to habitat fragmentation and increased nighttime disturbances would substantially limit reproductive capacity through the loss of individuals or habita**t**. The impact meets CEQA Appendix G Section IV(d) significance criteria since the access road would **substantially interfere 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.** It is reasonable to assume that the nesting birds and other species dependent on the area for breeding would experience lower reproductive success due to increased stress and habitat loss, resulting in a long-term decline in local populations.

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Therefore, the proposed project would result in a potentially significant impact on biological resources by disrupting wildlife movement and migratory corridors (Class I).

Impact BIO-4: Long-term operations from the proposed project would increase human presence in previously minimally inhabited areas, disturbing the California ground squirrel (*Spermophilus beecheyi*), brush rabbit (*Sylvilagus bachmani*), Botta's pocket gopher (*Thomomys bottae*), and mallard duck (*Anas platyrhynchos)*.

Long-term operation of the faculty housing and classroom project would result in a potentially significant increase in human presence, leading to chronic disturbances to wildlife within and adjacent to the project site. Introducing classrooms and residential units would bring substantial and constant human activity to an area that previously experienced minimal foot and vehicle traffic. Based on the building site plans (see Figure 2-9, page 2-10), it is reasonable to assume a worst-case scenario where 12 classrooms and 23 residential units would contribute to a daily population of 310 to 500 individuals transitioning through the project site. This depends on the classroom capacity, based on typical university class sizes between 25 and 40. From an independently conducted site visit on

January 13th, 2025, this represents a substantial increase from the previous low baseline of approximately 15 people at a time, resulting in constant disturbances from movement, noise, and vehicle activity.

It is reasonable to assume a worst-case scenario that the academic component of the project would introduce daily pedestrian and vehicle traffic, with class schedules running from 8:00 AM to 9:20 PM, Monday through Friday, and additional weekend activity for special events and club meetings. It is reasonable to assume a worst-case scenario where students and faculty would drive personal vehicles, utilizing the 57 planned parking spaces, leading to frequent vehicular movement along the access road (see Figure 2-6, page 2-8). The project's residential component would introduce additional nighttime disturbances, as residents would not be restricted to a set schedule and would drive at any hour, further affecting nocturnal wildlife activity. The California ground squirrel (*Spermophilus beecheyi*), brush rabbit (*Sylvilagus bachmani*), Botta's pocket gopher (*Thomomys bottae*), mourning dove (*Zenaida macroura*), mallard duck (*Anas platyrhynchos)* that rely on predictable low-disturbance periods for foraging, movement, and crossings would experience increased stress and habitat avoidance, substantially reduced foraging success, and disruption of movement corridors. Additionally, it is reasonable to assume that the increased vehicle use on the access road would lead to a higher risk of roadkill incidents, further impacting wildlife populations in the area.

Human activity and vehicle traffic would significantly fragment, eliminate, or disrupt foraging areas and access to food sources for the California ground squirrel (*Spermophilus beecheyi*), brush rabbit (*Sylvilagus bachmani*), Botta's pocket gopher (*Thomomys bottae*), mourning dove (*Zenaida macroura*), and mallard duck (*Anas platyrhynchos)* as they rely on undisturbed conditions for hunting, scavenging, or foraging.

The project also meets *County of Santa Barbara Planning and Development: Environmental Thresholds and Guidelines Manual* significance criteria, as it is reasonable to assume that introducing artificial lighting and human movement at all hours would **substantially limit reproductive capacity through the loss of individuals or habitat**, as species would abandon nesting areas or fail to reproduce successfully in response to never-ending disturbances.

Therefore, the proposed project would result in a potentially significant impact on biological resources due to increased human presence and long-term operations (Class II).

Figure 4-1 Coastal Bluff Scrub that Would be Removed, Looking North (01/07/2025)

Figure 4-2 Southern Coastal Salt Marsh and Southern Riparian Scrub, Looking West (01/07/2025)

Figure 4-3 Vegetation Along the Proposed Access Road, Looking West (01/07/2025)

Figure 4-4 Trees and Large Scrub that Would be Removed in the Project Envelope, Looking North (01/07/2025)

Figure 4-5 Tree Line that Would be Removed, Looking North (01/07/2025)

4.0 Mitigation Measures

4.2.3 Mitigation Measures and Residual Impacts

The following mitigation measures would be required to address the potentially significant environmental impacts on biological resources resulting from the proposed project's short-term construction and long-term operations.

4.2.4 Project Construction

Impact BIO-1: Vegetation removal from construction activities, such as grading, within the project site would result in the loss of southern coastal bluff scrub, southern coastal salt marsh, and southern riparian scrub. Removing these plant communities would affect rare or endangered plant species within a designated ESHA under the UCSB LRDP, resulting in a potentially significant short-term impact on biological resources.

MM BIO-1: To compensate for the permanent loss of sensitive habitat, the applicant shall submit a Habitat Restoration Plan (HRP) prepared by a qualified biologist. The HRP shall be designed to restore, enhance, and protect native vegetation within designated restoration areas and include the following;

a. Mature Native Planting:

- All revegetation shall use mature native riparian and coastal scrub species sourced from locally obtained plant and seed stock.
- Species selection shall match the lost habitat, including, but not limited to, seacliff buckwheat (*Eriogonum parvifolium*), California sagebrush (*Artemisia californica*), and coyote brush (*Baccharis pilularis*).
- Minimum planting density shall be one plant per square foot in designated restoration areas.
- Fences shall be implemented to protect and minimize disturbance to the newly designated areas.

b. Invasive Species Removal and Long-term Habitat Management:

- The HRP shall require the removal of invasive plant species (e.g., ice plant and non-native grasses) within restoration areas.
- All invasive removal efforts shall prohibit the disturbance of existing native species.
- The landowner shall conduct weekly maintenance to ensure non-native species do not recolonize in the restored areas.

Residual Impacts

Implementing MM BIO-1 would restore mature native plant communities within the project site, compensating for the loss of southern coastal bluff scrub, salt marsh, and riparian areas. The restoration plan ensures that the habitat loss does not result in a long-term reduction in species diversity, reproductive capacity, or foraging areas, thus reducing this impact to **less than significant** (Class II).

Mitigation Monitoring and Reporting Plan (MMRP)

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM BIO-1: Habitat Restoration Plan (HRP)	A qualified biologist shall prepare the HRP, including native species planting, irrigation, invasive species removal, and fencing. The plan shall be submitted before grading permit issuance.	The HRP shall be reviewed and approved by the UCSB Office of Campus Planning & Environmental Review before grading permit issuance.	UCSB Office of Campus Planning & Environmental Review shall conduct annual on-site inspections during planting for 20 years to verify compliance. After successful restoration implementation, performance security shall be released after the annual benchmark.

Impact BIO-2: Construction activities such as grading and excavating would result in the loss of nesting habitat for avian species, resulting in a potentially significant short-term impact.

MM BIO-2: To mitigate the loss of nesting habitat for avian species, the applicant shall retain a qualified biologist or certified arborist to prepare and implement a Tree Replanting Plan (TRP) designed to restore mature native trees that provide comparable height, structure, and ecological function to those removed.

The TRP shall include the following components:

a. Tree Species Selection and Requirements:

- All species shall be ecologically consistent with the trees that would be removed from construction activities such as grading and excavating.
- Selected species shall include western sycamore (*Platanus racemosa*), Fremont cottonwood (*Populus fremontii*), and arroyo willow (*Salix lasiolepis*), which provide suitable nesting and foraging habitat for raptors, migratory songbirds, and resident bird species.
- Tree replacements shall be planted at a minimum height of 10-15 feet at the planting time to match the removed trees' structural integrity closely.
- Replanting shall occur at a 3:1 ratio for every tree removed to compensate for the time required for new trees to reach maturity.

b. Construction Buffer and Nesting Avoidance Measures:

- A buffer zone of at least 75 feet past the dripline of the canopy shall be maintained around active nests of raptors and 50 feet for songbirds, as determined by a pre-construction survey.
- If tree removal occurs during the breeding season (February – August), a California Department of Fish and Wildlife (CDFW) approved biologist shall conduct nest surveys 72 hours before tree removal. Any active nests identified shall be protected until fledging is complete.

Residual Impacts

Implementing MM BIO-2 would restore suitable nesting habitats by replanting native, mature trees in areas where nesting resources have been lost, thus reducing this impact to **less than significant** (Class II).

Mitigation Monitoring and Reporting Plan (MMRP)

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM BIO-2: Tree Replanting Plan (TRP)	A qualified biologist or certified arborist shall prepare the TRP, including species selection, tree height, planting density, and maintenance measures. The plan shall be submitted prior to the issuance of grading permits, including vegetation clearing.	The TRP shall be developed and submitted to the UCSB Office of Campus Planning & Environmental Review for approval before any vegetation clearing.	UCSB Office of Campus Planning & Environmental Review shall conduct on-site inspections during planting and annually for 25 years to verify compliance. A final performance security shall be released upon successful tree establishment.

4.2.5 Long-Term Project Operations

Impact BIO-3: Long-term operations, including the introduction of permanent structures, roadways, and lighting from the proposed project, would disturb the migratory corridors and foraging behavior of the White-tailed Kite (*Elanus leucurus*), California Thrasher (*Toxostoma redivivum*), and Monarch Butterfly (*Danaus plexippus*).

MM BIO-3: To mitigate the disruption of migratory corridors and foraging behavior caused by artificial lighting, the applicant shall develop and implement a Wildlife-Sensitive Lighting Plan (WSLP) designed to minimize light pollution and reduce nighttime habitat disturbances for species of special concern, including the White-tailed Kite (*Elanus leucurus*), California Thrasher (*Toxostoma redivivum*), and Monarch Butterfly (*Danaus plexippus*).

The WSLP shall include the following components;

a. Low-intensity and Shielded Lighting Fixtures Lighting:

- All outdoor lighting around the building and along the newly built trails shall be low-intensity, low-glare, and designed to reduce light spillover into natural habitat areas.
- Fixtures shall be fully shielded and directed downward to prevent upward and horizontal light pollution.

b. Lighting Placement and Timing Restrictions:

- No lighting shall be installed within 200 feet of designated restoration areas or wildlife corridors unless required for safety.
- Pathway lighting shall be motion-activated rather than continuously illuminated to reduce unnecessary exposure.
- All exterior lighting shall be dimmed or turned off after 10 p.m. to align with natural nocturnal activity cycles.

Residual Impacts

Implementing MM BIO-3 would substantially reduce artificial lighting impacts on migratory corridors and foraging behavior by ensuring that light pollution is minimized, directional lighting is applied, and nighttime habitat disturbances are limited, thus reducing the project's impact on wildlife movement to **less than significant** (Class II).

Mitigation Monitoring and Reporting Plan (MMRP)

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM BIO-3: Wildlife-Sensitive Lighting Plan (WSLP)	In coordination with a certified biologist approved by CDFW, a qualified lighting consultant shall prepare a WSLP detailing shielded fixtures, reduced intensity, motion activation, and timing restrictions. The plan shall be submitted before building permit issuance.	The plan shall be prepared by a qualified lighting consultant in coordination with a certified biologist approved by the California Department of Fish and Wildlife (CDFW) for building permit issuance.	A certified biologist approved by CDFW shall conduct on-site inspections during installation and within the first year of operation to ensure compliance. Adaptive changes shall be implemented if post-installation monitoring indicates significant disruption to wildlife.

Impact BIO-4: Long-term operations from the proposed project would increase human presence in previously minimally habited areas, disturbing the California ground squirrel (*Spermophilus beecheyi*), brush rabbit (*Sylvilagus bachmani*), Botta's pocket gopher (Thomomys bottae), and mallard duck (*Anas platyrhynchos*).

MM BIO-4: To mitigate the increased human presence and disturbance to terrestrial species, the applicant shall implement a Habitat Enhancement Plan (HEP) to provide native natural barriers and habitat enrichment for California Ground Squirrels (*Spermophilus beecheyi*), Brush Rabbits (*Sylvilagus bachmani*), Botta's Pocket Gophers (*Thomomys bottae*), and Mallard Ducks (*Anas platyrhynchos*).

The HEP shall include the following components;

a. Establishment of a Buffer with Native Vegetations:

- A 30-foot-wide buffer of native vegetation shall be planted along the perimeter of the project area, especially near the Campus Lagoon, riparian corridors, and open space areas to provide visual and physical separation from human activity.
- The buffer shall use locally sourced and mature native species of the same characteristics of previously removed vegetation, providing food, shelter, and predator protection for these small mammals.

b. Minimization of Disturbance Through Human Activity Management:

- The project shall include signage and designated pedestrian pathways to prevent off-trail movement that would disturb wildlife corridors and nesting areas.

- Outdoor communal areas shall be located away from designated wildlife corridors to limit direct human disturbance.

Residual Impacts

Implementing MM BIO-4 would reduce the direct impacts of human presence on small terrestrial mammals and waterfowl by creating natural barriers, enhancing native habitat, and minimizing direct disturbances, thus reducing this impact to **less than significant** (Class II).

Mitigation Measure and Plan Requirement (MMRP)

Mitigation Measure	Plan Requirements	Review and Approval	Monitoring
MM BIO-4: Habitat Enhancement Plan (HEP)	A certified biologist approved by CDFW shall prepare a HEP detailing buffer size, species selection, habitat enrichment strategies, and maintenance measures. The plan shall be submitted before project occupancy.	The plan shall be reviewed and approved by a certified biologist and approved by the CDFW before occupancy and permits are approved.	A certified biologist approved by CDFW shall conduct on-site inspections during planting and annually for 20 years to ensure compliance. Adaptive changes shall be implemented if monitoring indicates habitat disturbance.

5.0 Cumulative Impacts

The cumulative impacts section aims to assess whether a project's incremental effects, when combined with other past, present, or foreseeable future projects, result in significant environmental impacts, as required by CEQA Section 15130 (CEQA Guidelines Section 15130). This analysis identifies related projects within the defined Region of Influence (ROI) and evaluates their collective impact on environmental resources. If the combined impact is significant, the project's contribution is examined to determine whether it is cumulatively considerable.

5.1 Region of Influence

The ROI for evaluating cumulative impacts on biological resources includes UCSB, the City of Goleta, and adjacent ecological areas where the proposed Campus Point Faculty Housing/Classroom Project, in combination with other related projects, would contribute to habitat loss, species displacement, and ecological disturbances (see Figure 5-1). Unlike some infill developments on previously disturbed land, several related projects within the ROI are located in undisturbed or natural areas, making their contribution to cumulative biological impacts more substantial. The ROI also includes sensitive habitats and Environmentally Sensitive Habitat Areas (ESHAs), such as Ellwood Mesa, Devereux Creek/Devereux Slough, and Bell Canyon Creek, where ongoing development pressures continue to reduce habitat availability, fragment ecological corridors, and disrupt native species populations.

5.2 Related Projects for Analysis

The following past, present, and reasonably foreseeable projects have been identified within the ROI as contributing to cumulative biological impacts (see Figure 5-1, page 5-5). These projects include residential developments, commercial expansions, infrastructure improvements, and habitat restoration efforts, all of which have the potential to affect native vegetation, wildlife corridors, and ecosystem stability (see Table 5-1).

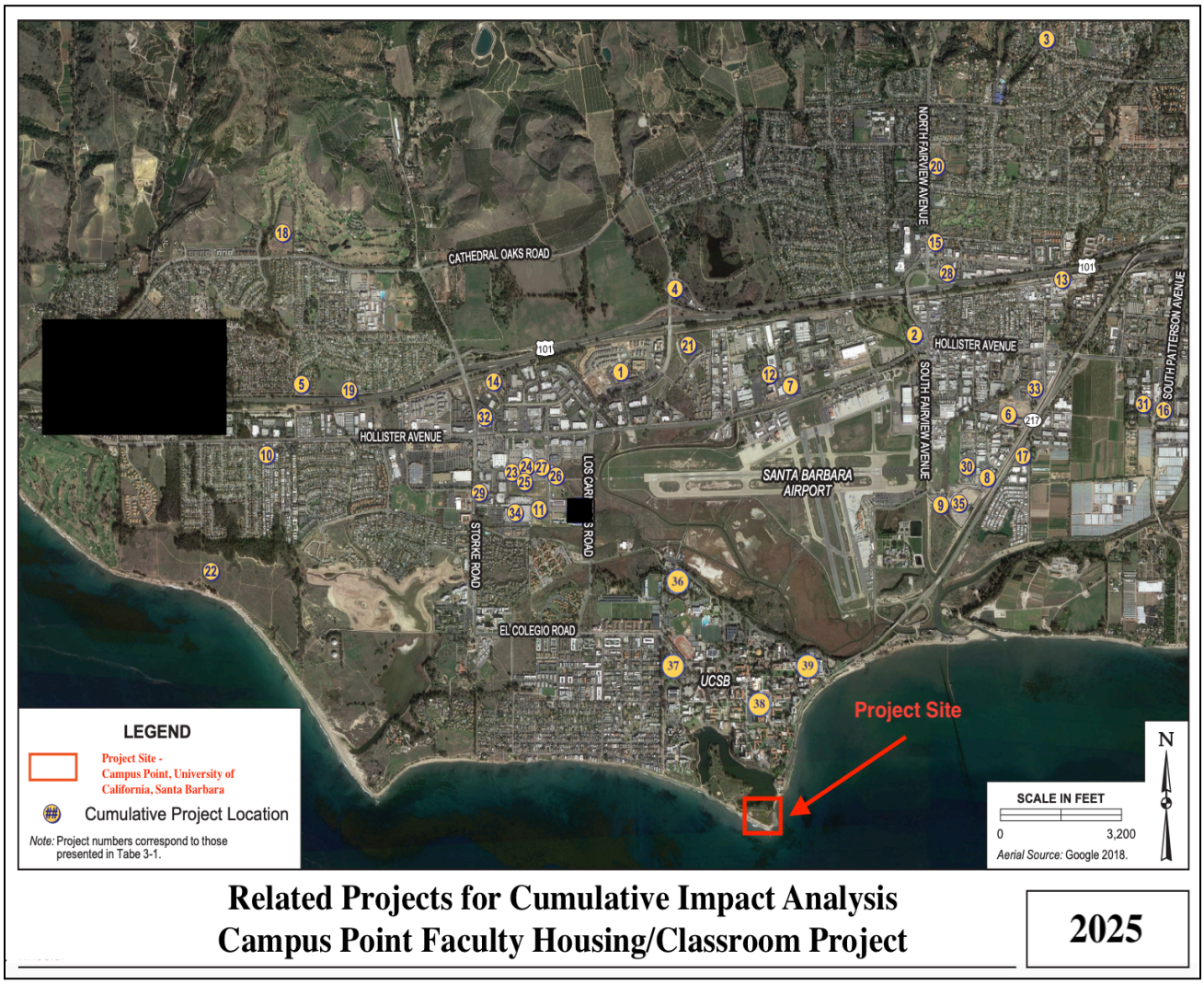

Figure 5-1 Related Projects for Cumulative Impact of Proposed Project Source: (City of Goleta, November 2018)

Table 5-1 Related Projects for Cumulative Impact Analysis

Project No.	Project Name	Description	Location	Project Status
Projects Under Construction				
1.	Village at Los Carneros	Residential, 465 units	Calle Koral and Los Carneros Road	Under construction
2.	Fairview Commerical Center	7,476 s.f. Commercial/retail building	151 South Fairview Avenue	Under construction
3.	Harvest Hill Ranch	7-Lot Residential Subdivision with 6 new homes	880 Cambridge Drive	Under construction
4.	Islamic Society of SB	6,183 s.f. building with a prayer room, meeting area, and one caretaker unit	N/E Corner of Los Carneros and Calle Real;	Under construction
5.	Citrus Village	Residential, 10 units	7388 Calle Real	Under construction
6.	Old Town Village	Residential and Commercial mixed-use, 175 townhomes with shopkeeper and live-work unit	South Kellogg Avenue	Under construction
7.	Marriott Residence Inn	90,989 s.f. Hotel, 118 rooms	6300 Hollister Avenue	Under construction
8.	Highway Recycling	Concrete and asphalt recycling facility with temporary and permanent equipment. This includes new creek restoration, fencing, landscaping, a trash enclosure, a retaining wall, and drainage improvements.	909 South Kellogg Avenue	Under construction
Approved Projects (Not Constructed)				
9.	McDonald's Drive-Thru Expansion	Second drive-thru land, revised parking and circulation, and new landscaping	1465 South Fairview Avenue	Approved
10.	Rancho Estates Mobile Home Park Fire Improvements (Rancho Goleta)	New fire access road, new/upgraded fire hydrants, new water lines, and existing car wash are in conformance.	7465 Hollister Avenue	Approved
11.	Pacific Beverage at Cabrillo Business Park Reduced Project	Reduction in 24,398 s.f. from previously approved building	355 Coromar Drive	Approved
12.	Site Improvements	768-s.f. elevator addition, 1,000-s.f. new building, and 314-s.f. addition to the rear of the building	130 Robin Hill Road	Approved

13.	Schwann Self Storage	Addition of basements to 3 previously approved but unconstructed buildings for a 135,741 s.f. self-storage facility	10 South Kellogg Avenue	Approved
14.	Cortona Apartments	Residential, 176 units	6830 Cortona Drive	Approved
15.	Fuel Depot	Reconstruction of convenience store/auto-service building (2,396 s.f.); no changes to existing fueling stations or canopy	180 North Fairview Avenue	Approved
16	Somera Medical Office Building	20,000 s.f. net new medical/dental office building	454 South Patterson Avenue	Approved
17.	Ward Renovations and Lot Split	New building façade, new site renovations, and lot split	749 and 759 Ward Drive	Approved
Pending Projects (Complete Application)				
18.	Shelby	Residential, 60 units	7400 Cathedral Oaks Road	Pending, Complete Application
19.	Kenwood Village	Residential, 60 units	7300 Calle Real	Pending, Complete Application
20.	Fairview Gardens	Master Use Permit and Special Events	598 North Fairview Avenue	Pending, Complete Application
21.	Heritage Ridge	Residential, 228 apartments and 132 senior apartments	North of Calle Koral and East of los Carneros	Pending, Complete Application
22.	Ellwood Mesa Coastal Trails and Habitat Restoration Project	Improve 7.1 miles of trails, improve 3 drainage crossings, improve 2 beach access points, and 13 acres of habitat restoration	Ellwood Mesa Preserve	Pending, Complete Application
Pending Projects (Incomplete Application)				
23.	Cabrillo Business Park, Lot 5	New 23,882-s.f. building within Cabrillo Business Park	6789 Navigator Way	Pending, Incomplete Application
24.	Cabrillo Business Park, Lot 6	New 16,750-s.f. building within Cabrillo Business Park	6765 Navigator Way	Pending, Incomplete Application
25.	Cabrillo Business Park, Lot 7	New 31,5842-s.f. building within Cabrillo Business Park	6759 Navigator Way	Pending, Incomplete Application

26.	Cabrillo Business Park, Lot 9	New 44,924-s.f. building within Cabrillo Business Park	301 Coromar Drive	Pending, Incomplete Application
27.	Cabrillo Business Park, Lot 14	New 44,004-s.f. building within Cabrillo Business Park	289 Coromar Drive	Pending, Incomplete Application
28.	Calle Real Hotel	3-story hotel, 134 rooms	5955 Calle Real	Pending, Incomplete Application
29.	Fuel Depot with Car Washes	1,667 s.f. New drive-in carwash, self-serve car wash, gas fueling dispensers, and manager's residence; Zizzo's Coffee building to remain	370 Storke Road	Pending, Incomplete Application
30.	Willow Industrial Park	146,000 s.f. new Light Industrial with outdoor storage and 2,587 s.f. office building	891 South Kellogg Avenue	Pending, Incomplete Application
31.	Providence Middle/High School	Façade improvements to existing 21,408 s.f. building and other associated site improvements	5385 Hollister Avenue	Pending, Incomplete Application
32.	Cortona Industrial Project	23,000-s.f. light industrial buildings use building and tentative parcel map	6864/6868 Cortona Drive	Pending, Incomplete Application
33.	Santa Barbara Honda	Includes façade improvements, a 1,628 s.f. enclosure of existing canopy for added showroom, a new 5,175 s.f. new enclosed canopy, and a new 300 s.f. new parts showroom	475 South Kellogg Avenue	Pending, Incomplete Application
34.	Verizon Wireless Antenna at U.S. Post Office	A new 66 ft. tall monopine wireless tower	400 Storke Road	Pending, Incomplete Application
35.	Sywest	70,594 s.f. high cube industrial building	907 South Kellogg Avenue	Pending, Incomplete Application
36.	UCSB San Benito Housing	a student housing development with 3,500 new beds on a 5-acre site (217,800 square feet)	By Mesa Road and Stadium Road	Approved
37.	UCSB Ocean Road Housing	A residential neighborhood on a 16.7-acre site (727,452 square feet) with 540 units for UCSB faculty and staff,	The southwestern perimeter of UCSB, adjacent to Isla Vista and along Ocean Road	Pending, Complete Application
38.	UCSB Classroom Building (Interactive Learning Pavilion)	A four-story classroom building with 53,700 assignable square feet and 95,250 gross s. f.	On the main campus of UC Santa Barbara	Completed/ Operational

		provides 5 lecture halls, 23 classrooms, and 26 support spaces.		
39.	UCSB Henley Hall	Three-story research facility (53,000 gross s.f.) for the Institute for Energy Efficiency (IEE), including laboratories, offices, a lecture hall, and accessory spaces.	On the main campus of UC Santa Barbara	Completed/ Operational

Source: (City of Goleta, November 2018)

Table 5-2 Total Related Project Development in the City of Goleta

Type of Development	Total
Residential	4,161 dwelling units
Retail	2,504,245 square feet

Source: (City of Goleta, November 2018)

5.3 Cumulative Impact Discussion

5.3.1 Combined Cumulative Impact

To assess the cumulative biological impacts of the Project, this section identifies reasonably foreseeable related projects that contribute to habitat loss, species displacement, and ecological changes within the ROI to assess the cumulative biological impacts of the Campus Point Faculty Housing/Classroom Project (see Table 5-3, page 5-8).

The related projects were selected based on the following criteria:

- Proximity to the project site and potential to impact overlapping biological resources.
- Involvement in land modification, such as vegetation removal, grading, or construction in or near sensitive habitats.
- Long-term operational impacts affect local ecosystems and wildlife behavioral patterns, including human-wildlife interactions, artificial lighting, and increased activity levels.

Within the ROI, several related projects involve residential and institutional development, contributing to habitat loss, species displacement, and increased human activity. While some projects are located within previously disturbed areas dominated by non-native vegetation, others, such as portions of Ocean Road Housing, Heritage Ridge, and Ellwood Mesa Coastal Trails & Habitat Restoration Project, affect undisturbed habitats and Environmentally Sensitive Habitat Areas (ESHAs), increasing their impact on biological resources.

Many of these projects require vegetation removal and grading, fragmenting native coastal scrub, riparian corridors, and upland habitats. Due to their small size and fragmented nature, some infill areas' contribution to cumulative biological impacts is more localized. Several approved and pending projects incorporate habitat restoration and mitigation measures, ensuring that long-term impacts are minimized.

Tree Removal and Cumulative Impact Considerations

The UCSB LRDP estimates that its projects would remove a substantial number of trees. Approximately 350 would be removed across the related UCSB projects alone (UCSB, 2008). The trees of concern would be 41 oak trees, 90 eucalyptus trees, and two scenic sycamores (UCSB, 2008). These only account for a subset of all related projects within the broader ROI. It is reasonable to assume that the number of removed trees across all developments is significantly higher.

Eucalyptus trees are present within several related project sites, and their removal is considered a considerable contribution to regional habitat loss. The loss of this species of trees would not be of significant biological importance. Still, the loss of ecosystem services that they provide reduces the number of nesting habitats available for avian species and foraging opportunities for small mammals and insects. Biological surveys have identified potential nesting bird habitats within some development areas, making tree removal a key factor in cumulative biological impacts across the ROI.

Through the implementation of project-specific mitigation measures, including MM BIO-1 and MM BIO-2 from Section 4.0, ***the combined contribution of these developments to cumulative biological impacts is expected to be cumulatively considerable*** (Class II)**.**

Figure 5-1 clearly presents these related projects by illustrating the geographic extent of the ROI and identifying projects that contribute to the cumulative biological impacts of the proposed development. Table 5-1 provides a detailed breakdown of each project, including a brief description to facilitate an objective analysis. The project numbers in Figure 5-1 correspond directly with those in Table 5-1 and Table 5-3, ensuring consistency and enhancing the understanding of their spatial relationships and cumulative effects.

Table 5-3 Related Projects within the Biological Region of Influence

Project No.	Project Name	Description	Location	Project Status
5.	Citrus Village	Residential, 10 units	7388 Calle Real	Under Construction
14.	Cortona Apartments	Residential, 176 units	6830 Cortona Drive	Approved
18.	Shelby	Residential, 60 units	7400 Cathedral Oaks Road	Pending, Complete Application
19.	Kenwood Village	Residential, 60 units	7300 Calle Real	Pending, Complete Application
21.	Heritage Ridge	Residential, 228 apartments and 132 senior apartments	North of Calle Koral and East of Los Carneros	Pending, Complete Application
22.	Ellwood Mesa Coastal Trails & Habitat Restoration Project	Improve 7.1 miles of trails, improve 3 drainage crossings, improve two beach access points, and 13 acres of habitat restoration	Ellwood Mesa Preserve	Pending, Complete Application
36.	UCSB San Benito Housing	Student housing project with 3,500 new beds in two phases, built on a 5-acre site (217,800 s. f.).	Between Mesa Road and Stadium Roac	Approved
37.	UCSB Ocean Road Housing	A residential neighborhood on a 16.7-acre site (727,452 s. f.) with 540 units for UCSB faculty and staff, including 180 townhomes and 360 apartments.	The southwestern perimeter of UCSB, adjacent to Isla Vista and along Ocean Road	Pending, Complete Application
38.	UCSB Classroom Building (Interactive Learning Pavilion)	A four-story classroom building with 53,700 assignable square feet and 95,250 gross s. f. provides 5 lecture halls, 23 classrooms, and 26 support spaces.	On the main campus of UC Santa Barbara	Completed/ Operational
39.	UCSB Henley Hall	Three-story research facility (53,000 gross s.f.) for the Institute for Energy Efficiency (IEE), including laboratories, offices, a lecture hall, and accessory spaces.	On the main campus of UC Santa Barbara	Completed/ Operational

Source: (City of Goleta, November 2018)

Table 5-4 Total Related Project Development

Type of Development	Total
Residential	2,081 dwelling units
	23.88 acres (1,040,502 s. f.)

5.3.2 Project Contribution to Cumulative Impact

The Campus Point Faculty Housing/Classroom Project contributes 40,000 square feet and the access road to the total cumulative development area of 1,040,502 square feet, accounting for approximately 3.85% of all related development projects within the biological ROI (see Table 5-4). The project includes 23 dwelling units, representing approximately 1.1% of the total 2,081 dwelling units planned across all cumulative projects (see Table 5-4). See Table 5-5 for how this was determined.

While these percentages would not appear substantial in a strictly quantitative sense, the project's location within an Environmentally Sensitive Habitat Area and adjacent to Campus Lagoon increases its biological significance.

Unlike some related projects on previously disturbed land, this project is located in a high-value ecological area, where habitat loss, vegetation removal, and increased human activity have greater potential to impact sensitive biological resources. The proximity to coastal scrub, riparian vegetation, and wetland habitats makes the site ecologically valuable, particularly for migratory bird species, wetland-dependent flora, endangered and threatened species, and native wildlife. Introducing infrastructure, artificial lighting, and long-term human activity would disproportionately affect local species compared to other regional developments.

The removal of mature trees across multiple related projects, including eucalyptus and oak trees, would substantially interfere with native resident or migratory wildlife species, established migratory corridors, or nursery sites. Given the region's connectivity to coastal estuaries and open space reserves, habitat fragmentation from cumulative developments would reduce available pathways for species movement. This impact is particularly relevant for avian species, small mammals, and insect-dependent species, which rely on these habitats for seasonal and year-round movement.

Therefore, the project's contribution to the combined cumulative impact on biological resources would be considered cumulatively considerable.

Table 5-5 Mathematical Process of Determining Cumulative Impact

Type	Process
Square feet (s. f.)	(40,000 / 1,040,502) * 100 = 3.85%
Dwelling units	(23 / 2,081) * 100 = 1.1%

5.3.3 Mitigation Measures and Residual Impacts

Given that the Campus Point Faculty Housing/Classroom Project's contribution to cumulative biological impacts is considered cumulatively considerable, mitigation measures must be implemented to reduce the project's long-term effects on habitat loss, species displacement, and foraging disruptions.

Among the mitigation measures reviewed, MM BIO-1 (Habitat Restoration Plan - HRP) and MM BIO-2 (Tree Replanting Plan - TRP) are the most suitable for addressing cumulative biological impacts, as several related projects involve significant tree removal that would otherwise provide nesting habitat, wildlife corridors, and foraging grounds for local species.

Habitat Restoration Plan (MM BIO-1) & Tree Replanting Plan (MM BIO-2)

To mitigate cumulative impacts caused by widespread tree removal across the ROI and its cascading effects on the local ecosystems, MM BIO-2 requires the replanting of native tree species either within the project envelope or in an alternative location where habitat restoration would be more effective. The TRP also helps restore lost habitat that works in correspondence with the HRP. These compensatory approaches ensure that:

- Habitat loss is offset by providing replacement trees in ecologically suitable areas.
- Foraging resources for avian and terrestrial species are restored, reducing disruptions to feeding behaviors.
- Disturbed habitats are actively restored by reintroducing native vegetation and wetland plant species.
- The structural integrity of nesting sites is maintained by planting mature trees (10-15 feet tall) at a 3:1 ratio for each tree removed, ensuring rapid habitat recovery.
- Construction buffer zones and pre-removal surveys minimize direct disturbances to active nesting sites.

By implementing MM BIO-2 and MM BIO-1 within this project, the cumulative impact of habitat fragmentation, species displacement, and food web disruptions can be reduced to a level considered **less than cumulatively considerable** (Class III).

6.0 Project Alternatives

This section addresses the alternatives to the proposed Project required to be discussed in an EIR as defined in CEQA Section 15126.6 to ensure that a full range of alternatives have been considered. The purpose is to identify and evaluate a reasonable range of alternatives that would feasibly achieve most of the project's objectives while avoiding or substantially reducing significant environmental impacts. The analysis focuses on practical alternatives capable of meaningful impact reduction, excluding those deemed infeasible.

6.1 Project Objectives

The first step in determining a reasonable range of alternatives to be analyzed is considering the basic project objectives previously defined in Section 2.1. These objectives are summarized below:

- Provide Faculty Housing—Develop 23 residential units to address the critical shortage of affordable housing for UCSB faculty.
- Expand Educational Facilities—To support the university's growing student population, approximately 12 classrooms would be constructed, totaling 9,510 square feet.
- Optimize Land Use—Develop a three-story, mixed-use structure that combines 40,000 square feet of residential space with classroom facilities, maximizing limited campus land as housing and classroom space become scarcer.
- Strategic Location—Position the project approximately 10–15 minutes from existing university facilities, ensuring convenience for faculty and students while accommodating individuals who would take longer.
- Enhance Competitive Recruitment—Strengthen UCSB's ability to attract and retain top-tier faculty by offering on-campus housing in a high-cost region.
- Enable Work-Life Balance—Create a faculty housing environment that balances personal and professional life.

6.2 Significant Environmental Impacts

The second step in identifying a feasible range of project alternatives is to define all of the potentially significant biological impacts associated with the proposed Project. Only potentially significant impacts can be used to identify feasible project alternatives, as outlined in Section 15126.6 of CEQA Guidelines. These are listed below:

Biological Resources

- **Impact BIO-1:** Vegetation removal within the project site would significantly affect sensitive habitat.
    - Construction activities, including grading and site preparation, would remove southern coastal bluff scrub, southern coastal salt marsh, and riparian scrub, which are designated Environmentally Sensitive Habitat Areas (ESHA) under the UCSB Long Range Development Plan (LRDP).
    - Approximately 35% of the habitat within the construction zone would be cleared, resulting in the direct loss of native vegetation, including species critical for pollinators, ground-nesting birds, and small mammals.
- **Impact BIO-2:** The loss of nesting habitat for avian species from intensive grading activities.

    - Tree and shrub removal within the southern coastal bluff scrub and riparian habitat would eliminate nesting and roosting sites for migratory birds and species of special concern, including white-tailed kites, great blue herons, and snowy egrets.

    - If vegetation clearing occurs during the breeding season (February–August), there is a high risk of nest abandonment and reduced reproductive success, further impacting bird populations.

- **Impact Bio-3:** Disruption of Migratory Corridors and Wildlife Movement.

    - Permanent structures, roadways, and artificial lighting would create physical and behavioral barriers, disrupting wildlife movement across the site.

    - Artificial lighting would interfere with nocturnal species, including small mammals and birds, reducing nighttime activity and foraging success.

- **Impact BIO-4:** Increased Human Presence and Long-Term Disturbances

    - The project would introduce daily human activity from classroom use and residential occupation, resulting in increased noise, vehicular traffic, and light pollution.

    - Daily foot traffic and vehicle use would disturb species that rely on undisturbed conditions for foraging and nesting, leading to habitat avoidance and reduced reproductive success.

6.3 Project Alternatives Screening Criteria

This section outlines the process for selecting a reasonable range of alternatives that would substantially reduce significant biological impacts while still achieving most of the basic project objectives. CEQA Guidelines Section 15126.6(c) requires evaluating alternatives based on their feasibility and ability to lessen significant environmental effects.

The project's primary environmental concerns are tied to its location within an ESHA. The significant biological impacts identified in Section 6.2 include;

- **Impact BIO-1**: The removal of sensitive vegetation
- **Impact BIO-2**: Loss of nesting habitat for avian species
- **Impact BIO-3**: Disruption of wildlife corridors
- **Impact BIO-4**: Increased human presence and disturbances

A reasonable range of alternatives must meet most of the basic project objectives while reducing the extent of significant biological impacts identified in Section 6.2. The following criteria were used to determine feasible alternatives for further evaluation:

- Achieves Most Project Objectives

    - Within 10–15 minutes of the main UCSB campus.

- The project must have 50% + 1 of the intended residential, classroom, and parking spaces, which are 7 residential units, 13 classrooms, and 29 parking spaces.
- Attract and retain top-tier faculty.
- Balances personal and professional life while offering an attractive location with scenic views.

- Reduces Biological Impacts
  - The alternative must substantially reduce or avoid impacts on sensitive habitats, nesting birds, and wildlife corridors, as identified in Section 6.2.
- Feasibility for Implementation
  - Considering UCSB's LRDP, infrastructure constraints, and regulatory limitations, the alternative must be realistic.

Based on these screening criteria, three alternatives were selected for further analysis:

- Reduced Project Onsite
- Reconfigured Project Onsite
- Alternative Location

6.4 No Project Alternative

As defined in CEQA Guidelines Section 15126.6(e), the No Action Alternative:

> "shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."

The project site is currently designated as an ESHA open space under the UCSB LRDP. It consists of sensitive habitats such as southern coastal bluff scrub, southern coastal salt marsh, and riparian scrub habitats. These habitats support various wildlife species, including migratory birds and sensitive plant communities, and serve as a wildlife corridor between the Campus Lagoon and adjacent natural areas. The site is minimally disturbed, with only existing footpaths and informal trails.

If the proposed project were not approved, the site would remain designated as open space, and no major development would occur. However, the site would still experience localized impacts from ongoing trail maintenance, habitat restoration, and recreational use. Trail maintenance would cause minor vegetation loss and soil disturbance, while restoration efforts, including planting and invasive species removal, would temporarily affect wildlife and habitat conditions. It is reasonable to assume that recreational use, such as hiking and informal trail access, would continue, contributing to minor soil compaction and localized disturbance to wildlife behavior. These ongoing activities would result in limited but manageable environmental effects.

- **Impact BIO-1:** Under the No Project Alternative, impacts associated with removing southern coastal bluff scrub, salt marsh, and riparian habitat would not occur. It is reasonable to assume that the site would remain undeveloped but still be subject to coastal erosion, eliminating habitat over time. These processes would result in substantially less disturbance to plant communities or wildlife dependent on these habitats. **Impact BIO-1 under the No Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project****.*

- **Impact BIO-2:** Under the No Project Alternative, impacts associated with removing nesting and roosting trees for migratory birds and small mammals would not occur. It is reasonable to assume that environmental stressors or unrelated land use changes in the region would still impact nesting opportunities over time, such as continued restoration activities. These actions would result in substantially less direct loss of nesting habitat from construction, and bird species would experience reduced displacement due to site disturbance. **Impact BIO-2 under the No Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project****.*

- **Impact BIO-3:** Under the No Project Alternative, impacts associated with obstructing movement corridors due to the access road and increased artificial lighting would not occur. It is reasonable to assume that the area would continue to experience indirect pressures from surrounding development, including edge effects from student housing and trails. **Impact BIO-3 under the No Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project****.*

- **Impact BIO-4:** Under the No Project Alternative, impacts associated with increased foot and vehicle traffic and daily human activity within a previously undisturbed habitat would be reduced. It is reasonable to assume that ongoing recreational use of the area and passive impacts from surrounding UCSB activities would still lead to minor disturbances. These actions would not permanently increase human activity levels or nighttime disturbances in the area. **Impact BIO-4 under the No Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project.***

As CEQA requires, an alternative among the remaining options must be identified as the most viable for reducing environmental impacts while still achieving most of the project goals since ***the No Project Alternative does not meet the fundamental objectives of the proposed project***.

6.5 Reduced Project Alternative

The Reduced Project Alternative would modify the proposed project by reducing the number of residential units and classrooms while maintaining feasibility for development. This alternative would retain faculty housing and classroom space but with a smaller overall footprint, lessening direct impacts on ESHA. The number of faculty residences would be reduced from 23 to 13 units (50% +1), and the number of classrooms would be reduced from 12 to 7 (50% +1). These reductions align with the project's primary objectives by still providing on-campus housing for faculty and additional classroom space while lowering development-related impacts.

- **Impact BIO-1:** The reduced footprint would result in less grading and clearing of ESHA habitats, particularly in southern coastal bluff scrub and riparian areas. While this alternative does not eliminate habitat loss, it reduces the total area disturbed compared to the proposed project. **Impact BIO-1 under the Reduced Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project.***

- **Impact BIO-2:** It is reasonable to assume that the same number of trees and vegetation would need to be removed to accommodate the three-story structure, meaning that direct nesting habitat loss would be

nearly identical to the proposed project. **Impact BIO-2 under the Reduced Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project***.

- **Impact BIO-3:** By reducing the overall building footprint, this alternative would result in less physical obstruction of wildlife movement, maintaining greater habitat connectivity than the proposed project. Some barriers to wildlife corridors would still exist, particularly from the roads. **Impact BIO-3 under the Reduced Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project.***

- **Impact BIO-4:** Reducing the number of residential units and classrooms would lower the number of occupants, visitors, and vehicles traveling to and from the site. This would result in fewer disturbances from human activity and artificial lighting, mitigating long-term stress on wildlife. **Impact BIO-4 under the Reduced Project Alternative would be significant (Class II)** ***and would be less than the proposed project.***

The Reduced Project Onsite Alternative would result in less overall habitat disturbance, fewer impacts on nesting birds, and a reduced intensity of human activity compared to the proposed project. However, it would not eliminate the significant environmental impacts associated with development within an ESHA. While this alternative ***still meets most project objectives,*** such as being within 10–15 minutes of the UCSB campus, situating faculty housing in an attractive area, reducing faculty housing from 23 to 13 units and classrooms from 12 to 7 would limit UCSB's ability to address its housing shortage and classroom needs fully.

6.6 Reconfigured Project Alternative

The Reconfigured Project Onsite Alternative modifies the site layout and design while maintaining the same number of faculty residences and classrooms. This alternative realigns the access road to avoid sensitive riparian and bluff scrub habitats along the lagoon, reducing grading and limiting direct habitat loss (see Figure 6-1, page 6-8). Rotating the building envelope shifts the parking lot entrance to the east side, making the site more compact and reducing the total paved area in ecologically sensitive zones. These adjustments minimize vegetation removal and habitat fragmentation while meeting most project objectives. Shifting the road's alignment to follow the existing stairway's path (see Figure 6-1) would coincide with the utility corridor, minimizing overall land disturbance (see Figure 2-7, page 2-10).

To compensate for removing the existing stairway, a new stairway would be relocated further down the bluff, extending to the beach and connecting to the walkway along the proposed road (see Figure 6-2). The new design would increase durability to withstand king tides or extreme weather, similar to a pier structure. This modification significantly reduces cut-and-fill volume, limiting vegetation removal and overall site disturbance.

- **Impact BIO-1:** Realigning the access road would avoid portions of sensitive habitat, reducing grading and direct vegetation loss. Rotating the building footprint would also allow for more efficient use of space, preventing unnecessary disturbance to native vegetation and the cut-and-fill of the slope bordering the lagoon. **Impact BIO-1 under the Reconfigured Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project***.

- **Impact BIO-2:** The realignment of the access road would significantly reduce the amount of nesting habitats that would be removed compared to the proposed project (see Figure 6-1, page 6-8). **Impact BIO-2 under the Reconfigured Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project.***

- **Impact BIO-3:** The realignment of the access road would significantly reduce the impact on wildlife corridors. The original access road created a substantial divide between animals migrating from the lagoon to the open space and vice versa. This reconfigured access road would substantially reduce the divide between the two habitats, creating a more seamless transition for the species. **Impact BIO-3 under the Reconfigured Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project.***

- **Impact BIO-4:** The reconfiguration of the access road would create a more direct route, reducing vehicle traffic and human activity near sensitive nesting habitats (see Figure 2-4, page 2-6). This alternative limits disturbance from noise, lighting, and movement, decreasing long-term stress on wildlife compared to the proposed project. **Impact BIO-4 under the Reconfigured Project Alternative would be less than significant (Class III)** ***and would be less than the proposed project.***

The Reconfigured Project Onsite Alternative ***would achieve most of the basic project objectives*** by reducing habitat disturbance and land modification, maintaining the same number of faculty residences and classrooms within 10–15 minutes of the main UCSB campus, and attracting and retaining top-tier faculty. By adjusting the access road alignment and rotating the building footprint, this alternative avoids unnecessary impacts on sensitive habitats and minimizes vegetation loss.

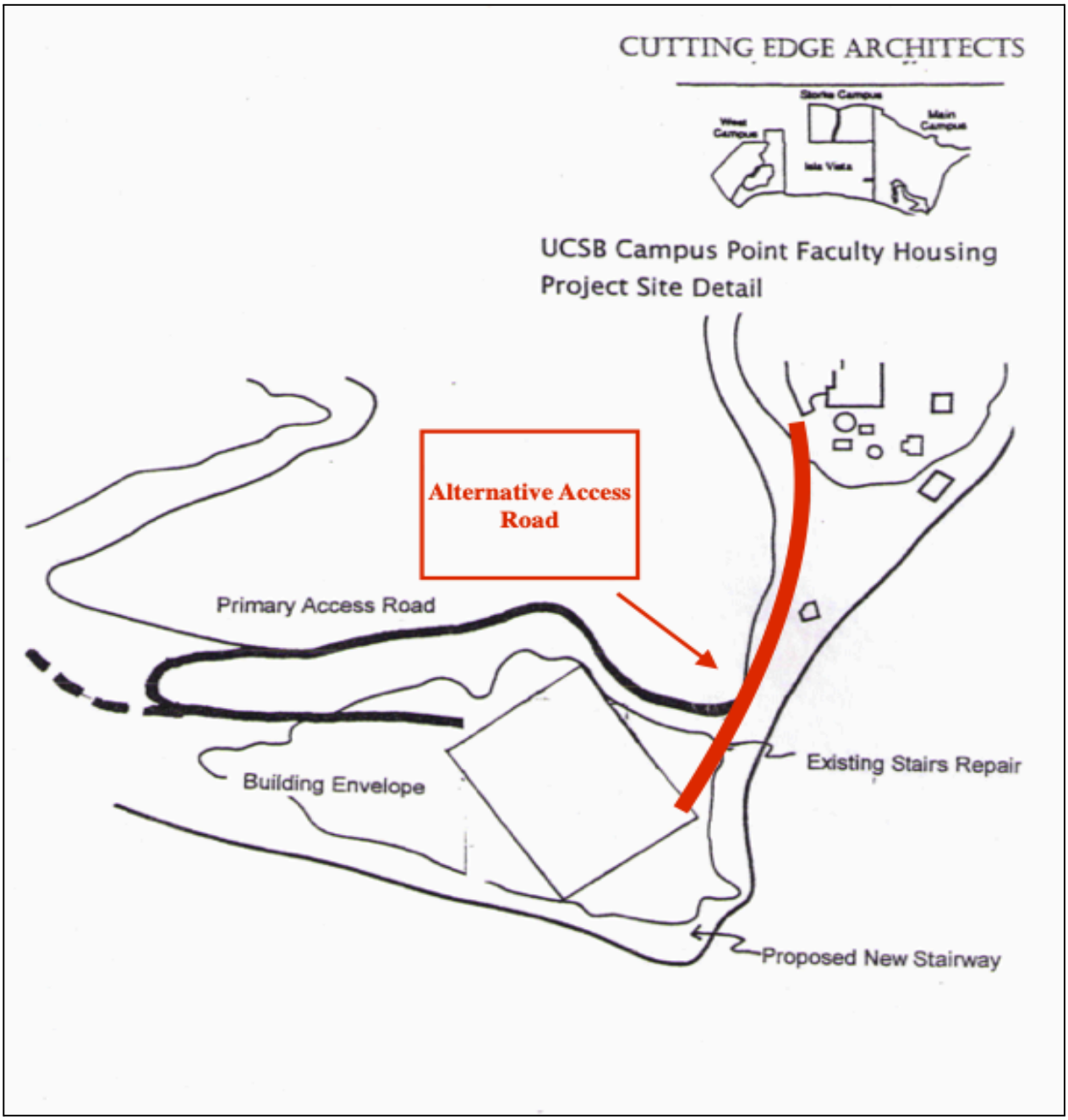

Figure 6-1 Alternative Access Road for Project Site

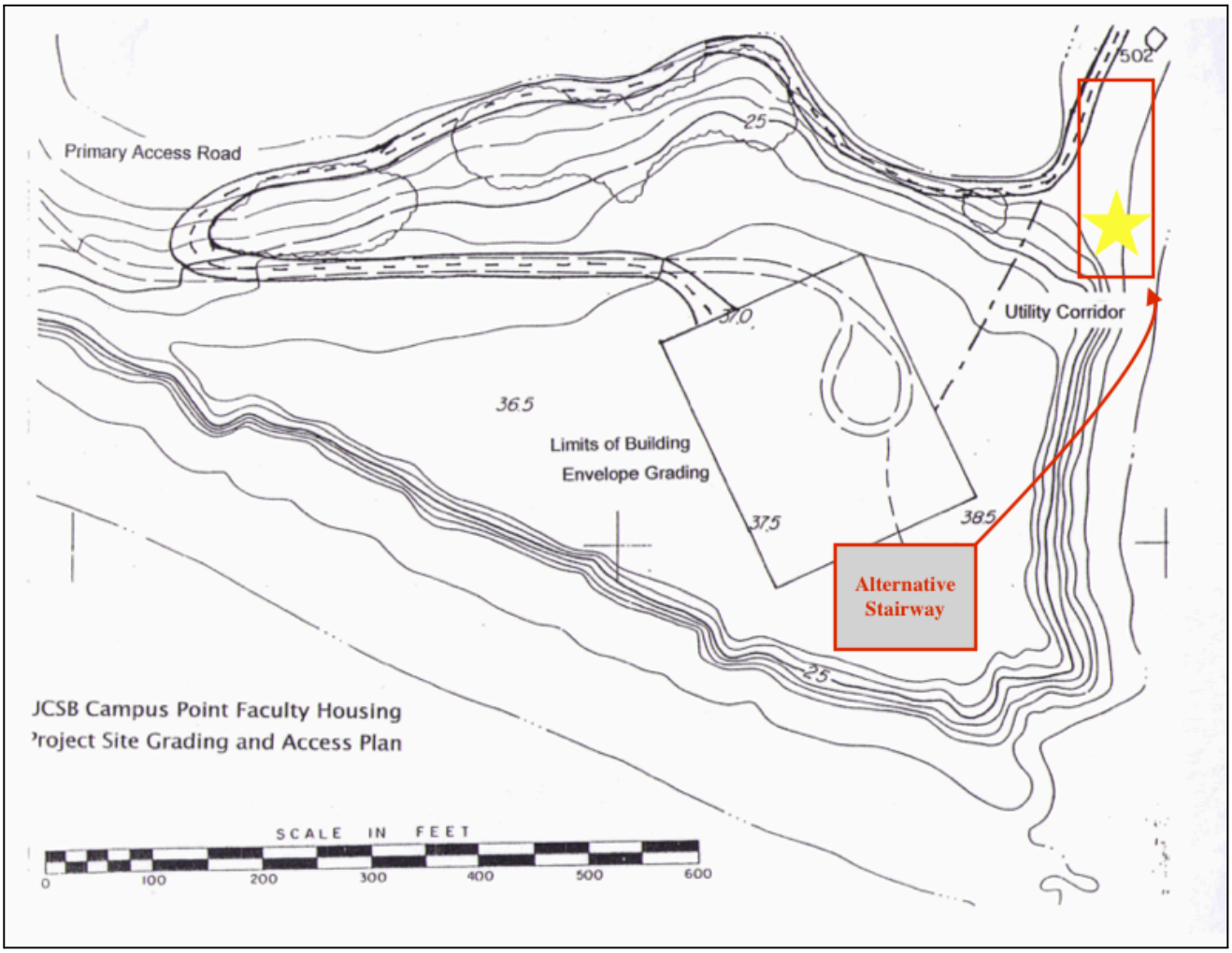

Figure 6-2 Alternative Stairway for Beach Access within Project Site

6.7 Off-Site Project Alternative

The Off-Site Project Alternative considers relocating the Project to the lot where the San Benito Housing project is proposed, a previously approved student housing development within UCSB's jurisdiction (see Figure 6-3, page 6-10). This site has already been designated for development, making it a feasible alternative that avoids most ESHA impacts while meeting the other project objectives.

Under CEQA Guidelines Section 15126.6(f)(2), an alternative location must be considered if it avoids or substantially lessens significant project impacts while remaining feasible. The San Benito site is in the northwestern portion of UCSB's Main Campus, near existing student housing and university facilities. Unlike the Goleta Point site, which contains expansive ESHA, the San Benito site includes a mix of previously developed areas and fragmented ESHA (see Figure 6-4).

The San Benito site contains:

- UCSB Coastal Live Oak Woodland ESHA
- UCSB Coastal Wetland ESHA

Sensitive habitats are present, but they are more fragmented and occur alongside previously developed infrastructure, including paved areas and university operational facilities. The San Benito site has been designated for student housing under UCSB's LRDP, meaning portions of the area were already planned for urban use. Compared to Goleta Point, which is largely undisturbed ESHA, development at San Benito would require less grading and avoid direct impacts on coastal bluff habitats.

- **Impact BIO-1:** While portions of the San Benito site were previously disturbed, it does contain some areas of native vegetation, including coastal live oak woodland ESHA. Relocating the project here would still result in vegetation removal, but the impact would be less than at Goleta Point, where removal would occur in a largely undisturbed ESHA. **Impact BIO-1 under the Alternative Location would be a less than significant (Class III)** ***and would be less than the proposed project.***
- **Impact BIO-2:** Unlike the proposed project site, which is entirely within ESHA, the San Benito site contains fragmented ESHA within a previously developed area. While some sensitive habitat loss would still occur, it is reasonable to assume that it would be significantly lower than at Goleta Point due to the disturbed nature of the site. **Impact BIO-2 under the Alternative Location would be a beneficial impact (Class IV)** ***and would be less than the proposed project.***
- **Impact BIO-3:** The San Benito site contains mapped ESHA, including coastal wetland and oak woodland, but development here would not act as a barrier to wildlife movement, as the area is already surrounded by existing development. Unlike Goleta Point, which is adjacent to the lagoon and has an extensive ESHA, San Benito does not serve as a critical wildlife corridor, making habitat fragmentation less of a concern. **Impact BIO-3 under the Alternative Location would be less than significant (Class III)** ***and would be less than the proposed project.***
- **Impact BIO-4:** The San Benito site is already planned for urban use. Relocating the project here would place human activity in an area where disturbance has already occurred rather than introducing new impacts to an ecologically sensitive location. The alternative does not completely eliminate human disturbance but substantially reduces its impact on biological resources. **Impact BIO-4 under the Alternative Location would remain significant but reduced (Class III)** ***and would be less than the proposed project.***

Vegetation removal and habitat loss would still occur, but the impact would be significantly lower because the site is partially developed and planned for student housing under UCSB's LRDP. The San Benito Alternative Location would ***meet most of the project objectives*** because it reduces most of the significant biological impacts by relocating the project to a previously disturbed site within 10–15 minutes of the UCSB campus and situating faculty housing in a secluded area.

6.8 Environmentally Superior Alternative

Since the No Project Alternative eliminates all project-related impacts, it is the environmentally superior alternative. However, as Section 15126.6(e)(2) outlines, CEQA requires identifying an environmentally superior alternative among the remaining options.

Based on Table 6.1, the Offsite Alternative (San Benito site) is the environmentally superior alternative, as it:

- Avoids most vegetation removal to Class III (less than significant).
- Avoids sensitive species loss (Class IV, beneficial).
- Reduces wildlife corridor disruption to Class III (less than significant).
- Maintains human presence impacts equal to the proposed project but not worsening them.

This alternative results in the greatest overall reduction in adverse biological impacts while fully achieving the project objectives, making it the most viable and environmentally preferred choice.

Table 6.1 - Comparison of Project Alternatives Impacts

Impact	Proposed Project	No Project Alt.	Reduced Alt.	Reconfigured Project Alt.	Offsite Alt.
BIO-1: Vegetation Removal	Class I	None (-)	Class III (-)	Class III (-)	Class III (-)
BIO-2: Loss of Sensitive Species	Class I	None (-)	Class III (-)	Class III (-)	Class IV (-)
BIO-3: Disruption of Wildlife Corridors	Class I	None (-)	Class III (-)	Class III (-)	Class III (-)
BIO-4: Increased Human Presence and Long-Term Disturbance	Class II	None (-)	Class II (=)	Class II (=)	Class III (-)

**Note:
Impacts with (-) would be less than the project.
Impacts with (=) would be equal to the project.
Impacts with (+) would be greater than the project.

Figure 6-3 - Current Project Site in Relation to Off-Site Location

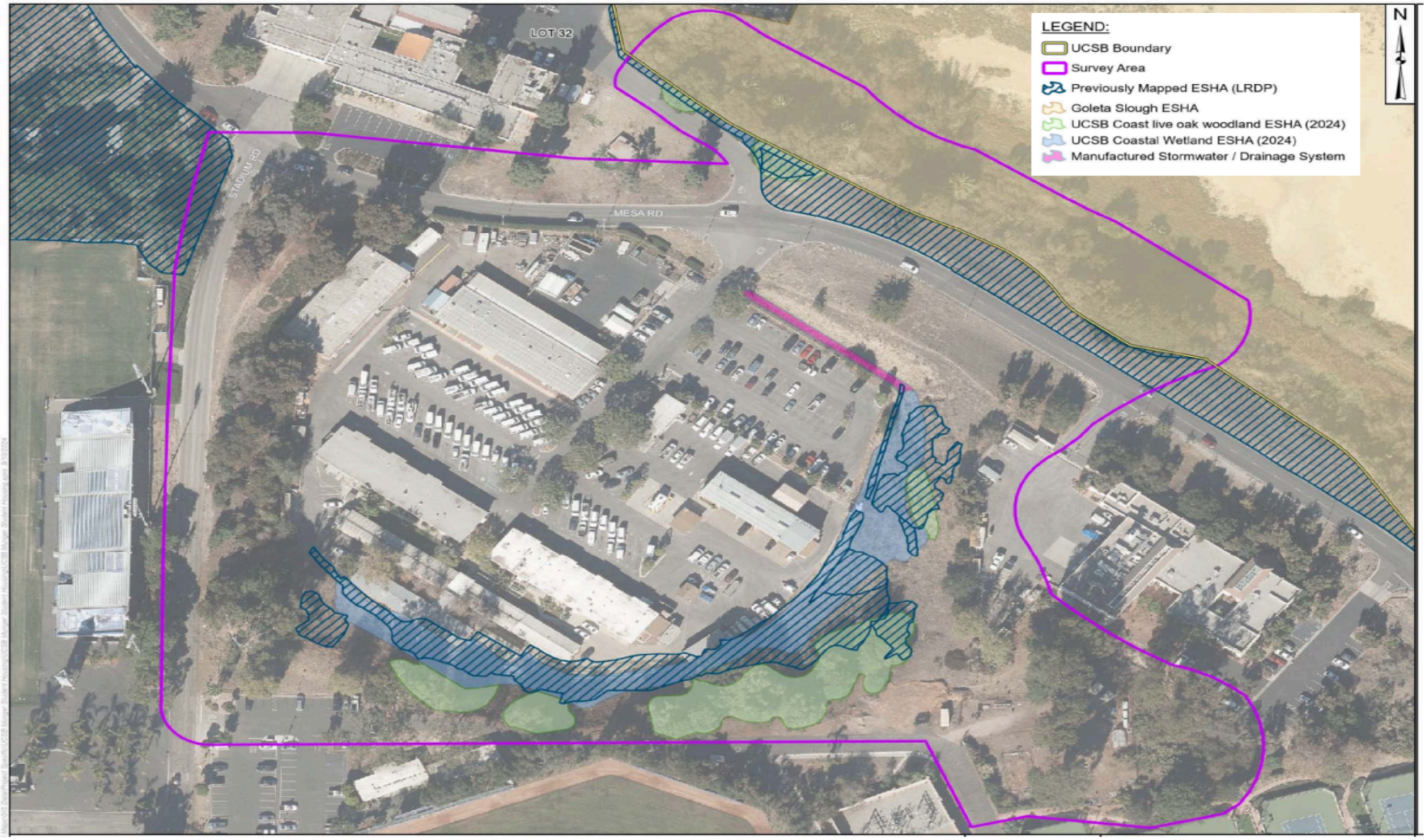

Figure 6-4 - San Benito Designated ESHA Areas **Source: (UCSB, 2024)**

7.0 Public Comments and Responses

The following section provides responses to the public comments submitted on the Draft Environmental Impact Report (DEIR) for the Goleta Point Faculty Housing/Classroom Project. Consistent with CEQA Section 15201, public participation is a critical part of the environmental review process, ensuring that environmental issues are properly evaluated and addressed. CEQA encourages agencies to receive and consider public input to improve the quality and accuracy of environmental analysis.

Each response addresses the specific issues raised, including species-specific impacts, habitat fragmentation, nesting bird habitat loss, and trail identification. Where applicable, the DEIR will have been revised to incorporate additional data and analysis to strengthen the assessment of environmental impacts and ensure compliance with CEQA standards. Each individual comment is identified and has been addressed in a response provided after the comment letter was received.

Cooper Mecham
2981 Cliff Dr, Santa Barbara, CA 93109
coopermecham@ucsb.edu

March 07, 2025

Mr Ethan Mathews
Top Associate Consultant of Santa Barbara
555 Storke Rd,
Goleta, CA 93109

Dear Mr Mathews,

On behalf of the Surfrider Foundation – Santa Barbara Chapter, I am submitting this comment letter regarding the Draft Environmental Impact Report (DEIR) for the Goleta Point Faculty Housing/Classroom Project. The Surfrider Foundation is dedicated to protecting and preserving our oceans, waves, and beaches through coastal conservation and environmental advocacy. Campus Point is not just a beloved surfing location—it is a critical coastal ecosystem that supports diverse native species, sensitive habitats, and marine life. While we recognize the need for faculty housing and classroom expansion at UCSB, we are deeply concerned that the DEIR's biological resources analysis is incomplete, lacks key details, and does not provide a sufficient evaluation of species-specific impacts.

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1. Failure to Identify and Assess Impacts on Specific Affected Species- In Section 4.2.1 (Impact BIO-1), the DEIR acknowledges habitat loss but fails to identify the specific species that will be directly affected. A thorough CEQA-compliant analysis must list all species that rely on these ecosystems and evaluate how their foraging, breeding, and migration patterns will be disrupted. The CEQA Guidelines Appendix G require a species-specific impact analysis, yet the DEIR fails to meet this standard by generalizing habitat loss without directly linking it to affected species. Recommendation: The Final EIR must include a comprehensive species list and an analysis of how habitat loss will impact each species' population, reproductive success, and survival. Recommended species to look at would be the white tailed kite (*Elanus leucurus*), snowy egret (*Egretta thula*), and the Monarch butterfly (*Danaus plexippus*).

2. Insufficient Analysis of Habitat Fragmentation and Wildlife Movement Disruptions In Section 4.2.2 (Impact BIO-3), the DEIR acknowledges that habitat fragmentation will occur but fails to provide a substantive analysis of its impacts. While it states that the project will permanently develop 20% of the coastal bluff scrub and place a roadway along 80% of the Campus Lagoon's southern boundary, it does not assess how these changes will sever habitat connectivity for local species. A species-specific

assessment would help in better understanding how habitat fragmentation will impact key species. Some species to look at regarding habitat fragmentation would be the Brush rabbit (*Sylvilagus bachmani*), Botta's pocket gopher (*Thomomys bottae*), Common garter snake (*Thamnophis sirtalis*) as well as potential pollinators. Some recommendations would be to include a species-specific discussion on how fragmentation will impact small mammals, reptiles, and pollinators.

3. Insufficient Analysis of Nesting Bird Impacts- In Section 4.2.1 (Impact BIO-2), The DEIR does not provide a quantitative estimate of how much nesting habitat will be removed. The DEIR acknowledges that tree and shrub removal will result in the loss of nesting habitat for avian species but does not quantify how much vegetation will be lost or how many nesting sites will be affected. CEQA requires that environmental impacts be supported by substantial evidence. Without specific data on habitat loss, the assessment does not meet CEQA's standard for a defensible impact analysis. The Final EIR should provide a quantitative estimate of tree and vegetation removal and assess how this loss compares to regional nesting habitat availability.

4. Lack of Identification and Mapping of Trails in the Environmental Setting- In Section 3.3.2 – Existing Human Disturbance, The DEIR states that trails are used frequently by students, faculty, and the public, contributing to localized habitat degradation. Still, it does not identify or map these trails. It is difficult to identify their locations and evaluate their specific environmental impacts, including erosion, vegetation loss, and wildlife disturbance. Without identifying trails, it is impossible to determine where habitat degradation is occurring or whether trail expansion, rerouting, or closures should be considered. The Final EIR should include A map showing all existing trails, including informal or unauthorized pathways. An analysis of which trails contribute most to habitat degradation. A discussion of whether certain trails pass through sensitive habitats, such as nesting areas for the snowy plover.

As a representative of the Santa Barbara Surf Riders Association, I appreciate the effort put into preparing this DEIR and recognize the importance of faculty housing and educational expansion at UCSB. However, as noted above, the document would benefit from additional clarity and supporting evidence regarding the environmental setting, nesting bird habitat loss, human disturbance impacts, and cumulative effects on regional biodiversity. Addressing these gaps would strengthen the analysis and ensure compliance with CEQA requirements.

Thank you for your time and consideration. I look forward to seeing these concerns addressed in the Final EIR. Please contact me if you have any questions or require further clarification.

Sincerely,

Cooper Mecham

Dear Mr. Cooper Mecham,

We appreciate the time and effort taken to provide these thoughtful comments. CEQA Section 15201 states that “public participation is an essential part of the CEQA process,” encouraging public agencies to receive and evaluate public input on environmental issues related to agency activities. The feedback will help clarify and strengthen the Final EIR, which is consistent with CEQA’s mandate to incorporate public input into the review process.

Comment 1: Failure to Identify and Assess Impacts on Specific Affected Species

- Comment 1 is acknowledged and appreciated. Mr. Mecham raises a thoughtful concern regarding identifying and assessing specific animal species that would be affected by the project. However, Impact BIO-1 in the DEIR focuses on removing southern coastal bluff scrub, southern coastal salt marsh, and southern riparian scrub due to short-term construction activities. The analysis in Section 4.2.1, page 4-2, paragraph 1 addresses how this vegetation removal would affect rare or endangered plant species within a designated Environmentally Sensitive Habitat Area (ESHA) under the UCSB Long Range Development Plan (LRDP). Therefore, the section is adequate, and we believe no additional information is needed to address the concern on sensitive habitat removal fully. While the species of concern are not directly within the scope of Impact BIO-1, the potential effects on foraging, breeding, and migration patterns for species such as the white-tailed kite (Elanus leucurus), snowy egret (Egretta thula), and monarch butterfly (Danaus plexippus) are considered under Impact BIO-3 page 4-3.

Comment 2: Insufficient Analysis of Habitat Fragmentation and Wildlife Movement Disruptions

- Comment 2 is acknowledged and appreciated. Mr. Mecham raises a valid concern regarding the potential for habitat fragmentation and its effect on local wildlife movement. However, the DEIR’s analysis under Section 4.2.2 (Impact BIO-3) provides a detailed assessment of habitat fragmentation, including how the permanent development of 20% of the coastal bluff scrub and the construction of a roadway along 80% of the Campus Lagoon’s southern boundary would affect habitat connectivity. The DEIR evaluates the potential for reduced connectivity and acknowledges that wildlife corridors would minimize the effects of long-term fragmentation. While the analysis does not include a species-specific evaluation for small mammals, reptiles, and pollinators, it sufficiently assesses impacts at the habitat level. Since species like the brush rabbit (Sylvilagus bachmani), Botta’s pocket gopher (Thomomys bottae), and common garter snake (Thamnophis sirtalis) are known to rely on the coastal bluff scrub and riparian habitat types addressed in the DEIR, the existing analysis adequately considers the potential effects on species movement and connectivity. Therefore, we believe the section is adequate, and no additional information is needed to address each species concerning habitat fragmentation.

Comment 3: Lack of Identification and Mapping of Trails in the Environmental Setting

- Comment 3 is recognized and appreciated. Mr. Mecham raises an important point regarding the need for a more detailed, quantitative assessment of vegetation removal and its effect on nesting bird habitat. To address this gap, the DEIR will be revised to include a quantitative assessment of tree and vegetation removal within the project footprint. This revision would be

added to Impact BIO-2 in paragraph 1 on page 4-2. It would include the total number of trees and shrubs that would be removed and the approximate size and height of affected trees. For example, *based on an independent project site visit, it was noted that approximately 30-40 trees ranging in height from 15-25 feet would be removed for the proposed access road to be built.* See page 4-3 of Project Impacts for all changes made in the Final EIR.

Comment 4: Lack of Identification and Mapping of Trails in the Environmental Setting

- Comment 4 is acknowledged and appreciated. Mr. Mecham raises an essential issue regarding the need for greater clarity in identifying existing trails. To improve the clarity and accuracy of the environmental setting, the DEIR will be revised to include a mapped representation of all trails within the project area, including a quantitative description such that the trail's total length in the current project site sums to approximately 200 feet and their temporal characteristics of designated uses occur year-round which would have a continued effect on the area. The revised map and expanded analysis will be added to Section 3.3.2 – Existing Human Disturbance on page 3-13 of the Final EIR. These additions would later be referenced in the “No Project Alternatives” since this would continue to destroy habitat as a passive use of the area.

We appreciate the thoughtful comments Mr. Cooper Mecham of the Surfrider Foundation – Santa Barbara Chapter provided. The proposed revisions, including a quantitative assessment of vegetation loss and adding a trail map, would enhance the accuracy and completeness of the Final EIR. These improvements would ensure that the DEIR meets CEQA’s requirements and provides a clear basis for evaluating the project’s environmental impacts.

Sincerely,

Ethan Mathews

Ethan Mathews

Top Associate Consultant of Santa Barbara

7.1 Public Presentation Summary

The comments submitted by Mr. Mecham on behalf of the Surfrider Foundation – Santa Barbara Chapter provided valuable insights that have strengthened the accuracy and completeness of the Draft Environmental Impact Report (DEIR). Consistent with CEQA Section 15201, public participation is an essential part of the environmental review process, and the feedback received has helped clarify key aspects of the analysis.

After carefully reviewing the comments, the DEIR has been revised to incorporate a quantitative assessment of vegetation removal and add a trail map to improve the clarity and transparency of the environmental setting. The revisions to Impact BIO-2 and Section 3.3.2 – Existing Human Disturbance would enhance the understanding of project-related impacts and strengthen the evaluation of potential mitigation measures.

The changes made to the DEIR do not constitute substantial changes that would require recirculation under CEQA guidelines. The revisions are intended to clarify and enhance the existing analysis without altering the overall conclusions regarding the project's environmental impacts. Therefore, the DEIR remains consistent with CEQA's requirements and does not necessitate further public review.

We appreciate Mr. Mecham's time and effort in providing these thoughtful comments, which have meaningfully contributed to refining the Final EIR.

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