

CALIFORNIA COASTAL COMMISSION

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T19b

April 21, 1997

TO: Commissioners and Interested Persons

FROM: Steve Scholl, Deputy Director, South Central Coast
 Gary Timm, District Manager
 Rebecca Richardson, Coastal Program Analyst

SUBJECT: Proposed Major Amendment (1-97) to the University of California Santa Barbara Certified Long Range Development Plan for Public Hearing and Commission Action at the May 13, 1997 Commission Meeting in Santa Barbara.

SYNOPSIS

The University of California Santa Barbara is requesting an amendment to its Long Range Development Plan (LRDP) by changing the location of 600 ft. of the certified University/Mesa Road expansion. The existing two lane road is located along the northern perimeter of the Main Campus. As certified in the LRDP, approximately 2,000 ft. of road will be expanded to four lanes. The University proposes to revise the alignment of 600 ft. of the road expansion to locate it approximately 40 ft. further north than its approved blufftop location. This 600 ft. segment is an area of the blufftop that was previously developed with a tank farm. The remaining 1400 ft. of the road will be in the same location as certified by the Commission. Consistent with the Commission's certification of the road expansion, all segments of the road will be setback at least 10 feet from the top of the bluff face. The blufftop area is presently designated as ESHA in the LRDP and the bluffs which contain the Campus' last native oak woodland abut the Goleta Slough.

The University is also proposing to redesignate 1.9 acres of land that are presently designated as Open Space and Academic to ESHA. The 1.9 acres of land is located on the blufftop along most of the road, including the area (.5 acres) that is currently developed with a tank farm. This proposed revision of 1.9 acres of land to ESHA is based on two factors: 1) the biological assessment that was performed for the area indicated that bluffs bordering the Goleta Slough encompassed a broader area than the ESHA mapped under the certified LRDP; and, 2) a proposed restoration program of 5.45 acres total of area that will restore this area with native habitat. Of the 1.9 acres, approximately .5 acres only presently meets the Coastal Act definition of ESHA. Additionally, the University is proposing to add pedestrian trails and lookout areas along the top of the bluffs and at the base of the bluffs to the LRDP's proposed pedestrian Campus walkways.

The proposed amendment is inconsistent with the Coastal Act for the following reasons: land that is developed or disturbed does not meet the Coastal Act definition of ESHA; the policies within the LRDP are inadequate to insure that the proposed relocation of 600 ft. of the roadway expansion closer to the designated ESHA will not have adverse impacts on the Goleta Slough and bluffs; and, the proposed trails as development along the Goleta Slough bluffs do not provide adequate policy direction to ensure that habitats will be protected, that the trails allow passive recreation only and that the public is made aware of the trails.

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending that the Commission, after public hearing, **deny** the amendment to the certified LRDP as submitted; then **approve, only if modified**, the amendment to the LRDP. The modifications are necessary because, as submitted, the LRDP amendment is not consistent with the Chapter 3 policies of the Coastal Act. The motions to accomplish this recommendation are found on **page 3 and 4**. The suggested modifications are found on pages **5 through 7**.

Additional Information: Please contact Rebecca Richardson, California Coastal Commission, South Central Coast Area, 89 So. California St., Second Floor, Ventura, CA. (805) 641-0142.

STANDARD OF REVIEW

The standard of review for the proposed amendment to the certified LRDP, pursuant to §30512(c) of the Coastal Act, is that the proposed amendment is in conformance with the Chapter 3 policies of the Coastal Act.

ISSUE AREA

The proposed LRDP amendment does not meet the requirements of the Coastal Act. The areas that are at issue are listed on the chart below according to issue area, LRDP proposal and Coastal Act analysis.

ISSUE AREA	PROPOSAL	COASTAL ACT ANALYSIS	SUGGESTED MODIFICATION
<p>1) <u>Redesignation of 1.9 acres of land to ESHA that is currently developed and disturbed and encroachment of roadway into the buffer area of a native oak community that forms a contiguous part of the Goleta Slough habitat area:</u></p>	<ul style="list-style-type: none"> •Redesignate LRDP land use from 1.9 acres of Open Space & Academic to ESHA. •Revise LRDP policy pertaining to development on Goleta Slough Bluff top. •Realignment of 600 ft. of University/ Mesa Road 	<p>Coastal Act §30107.5 defines ESHA as any area in which plant or animal habitats are either rare or especially valuable because of their special nature or role in an ecosystem. §30240 mandates that ESHAs be protected and states that only uses dependent on the resources be allowed in ESHAs. Additionally, all development adjacent to ESHAs must be sited and designed to prevent adverse impacts on the ESHA.</p>	<p>Modifications 1, 2, 3, 4 & 5</p>
<p>2) <u>Development of a pedestrian pathway within an ESHA -- the Goleta Slough Bluffs. Trails & viewing areas would be constructed along the blufftop and base of bluff.</u></p>	<p><i>No policy or map changes are proposed to guide the development of a public pedestrian accessway & viewing areas along the bluff top & bluff base of the Goleta Slough.</i></p>	<p>Coastal Act §30210 mandates that the maximum public access & recreational opportunities be provided. §30213 requires that lower cost visitor and recreational opportunities be protected, encouraged and, where feasible provided.</p>	<p>Modifications 6 & 7</p>

PUBLIC PARTICIPATION

§30503 of the Coastal Act requires public input in preparation, approval, certification and amendment of any LRDP. The University circulated a Notice of Preparation and a Draft EIR. In addition, the University held a public hearing and received written comments regarding the project from public agencies, organizations and individuals. The hearing was duly noticed to the public consistent with §13552 and §13551 of the California Code of Regulations which require that notice of availability of the draft LRDP amendment (LRDPA) be made available six (6) weeks prior to the Regents approval of the LRDP amendment and Final EIR. Notice of the subject amendment has been distributed to all known interested parties.

PROCEDURAL REQUIREMENTS

Pursuant to §13551(b) of the California Code of Regulations, the University resolution for submittal must indicate whether the LRDPA will require formal adoption by the Board of Regents after the Commission approval, or is an amendment that will take effect automatically upon the Commission's approval pursuant to Public Resources Code §30512, §30513 and §30519. Because this approval is subject to suggested modifications by the Commission, the University must act to accept the adopted suggested modifications within six months from the date of Commission action before the LRDPA shall be effective and the requirements of §13544, which provides for the Executive Director's determination that the University's action is legally adequate, must be fulfilled.

I. ACTION ON UNIVERSITY OF CALIFORNIA, SANTA BARBARA LRDP AMENDMENT 1-97

Following a public hearing, staff recommends the Commission adopt the following resolutions and findings. The appropriate motion to introduce the resolution and a staff recommendation are provided just prior to each resolution.

A. RESOLUTION I Resolution to deny certification of the University of California, Santa Barbara Long Range Development Plan Amendment 1-97, as submitted

MOTION I

I move that the Commission **certify** the University of California, Santa Barbara Long Range Development Plan Amendment 1-97, as submitted.

STAFF RECOMMENDATION

Staff recommends a **NO** vote and the adoption of the following resolution and findings. An affirmative vote by a majority of the appointed Commissioners is needed to pass the motion.

RESOLUTION I

The Commission hereby **denies certification** of the University of California, Santa Barbara Long Range Development Plan Amendment 1-97 and adopts the findings stated below on the grounds that the amendment will not meet the requirements of and conform with the policies of Chapter 3 of the Coastal Act, and approval of the amendment as submitted will have significant environmental effects for which feasible mitigation measures have not been employed consistent with the California Environmental Quality Act. There are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant adverse impacts which the approval of the Long Range Development Plan amendment would have on the environment.

B. RESOLUTION II Resolution to approve certification of the University of California, Santa Barbara Long Range Development Plan Amendment 1-97, if modified.

MOTION II

I move that the Commission **certify** the University of California, Santa Barbara Long Range Development Plan Amendment 1-97, if it is modified in conformity with the suggested modifications set forth in this staff report.

STAFF RECOMMENDATION

Staff recommends a **YES** vote and the adoption of the following resolution and findings. An affirmative vote by a majority of the appointed Commissioners is needed to pass the motion.

RESOLUTION II

The Commission hereby **certifies** the University of California, Santa Barbara Long Range Development Plan Amendment 1-97 for the reasons discussed below, on the grounds that the amended Long Range Development Plan meets the requirements of and conforms to the Chapter 3 policies of the Coastal Act if modified according to the suggested modifications stated in Section II of this report. The Long Range Development Plan amendment, if modified, will not have significant environmental effects within the meaning of the California Environmental Quality Act. The Commission further finds that if the University adopts and transmits its revisions to the amendment to the Long Range Development Plan in conformity with the suggested modifications, then the Executive Director shall so notify the Commission.

II. SUGGESTED MODIFICATIONS

The staff recommends the Commission certify the following, with modifications as shown. Language proposed by the University of California, Santa Barbara in the subject LRDP amendment and language presently contained within the certified LRDP is shown in straight type. Language recommended by Commission staff to be deleted is shown in ~~line-out~~. Language proposed by Commission staff to be *inserted* is shown in **boldface italics**.

Modification 1

Figure 28: Environmentally Sensitive Habitats:
(page 187)

Update Figure 28 to designate all area shown as developed and disturbed on Figure 8, including area west of the developed area that is vegetated with Eucalyptus and ornamental landscaping (subject of future restoration) as Open Space ESHA Buffer.

Modification 2

Land Resources: Ocean and Goleta Slough Bluffs on the Main Campus:
(page 191, second paragraph, second sentence)

Portions of the bluff that are disturbed or vegetated with non-native plant species and subject to habitat restoration shall be protected and designated as Open Space ESHA Buffer. Allowed uses in this area shall be limited to pedestrian trails, interpretive signs and habitat enhancement and restoration. The bluff is well protected because University Road separates the academic areas of the Campus from the bluff, ~~and there is no pedestrian pathway along the top of the bluff.~~

Modification 3

Policy 30240(a).11:
page 198

The Goleta Slough habitat will be preserved and protected.

- a. **With the exception of pedestrian trails,** ~~there~~ shall be no construction on the Goleta Slough bluffs and bluff-tops, consisting of everything **that are** designated as ESHA and ESHA Open Space Buffer north of University Road.
- b. **Should bluff failure occur, University Road shall be realigned south of the bluff face; the construction of retaining walls or other forms of remediation on the bluff face ESHA area shall not be allowed.**

- c. **Any construction that occurs on the Goleta Slough bluff top including the removal of riparian vegetation or habitat shall be mitigated within the immediate area by restoring or planting native vegetation of equal or greater area in size.**
- d. b. Dumping of refuse or other debris on or near the slough bluffs is prohibited.
- e. e. Oak trees along the bluffs shall be preserved and protected **to the maximum extent possible.**
- f. **Oak trees that are removed in conjunction with the construction or repair of University Road shall be replaced at a ratio of 1:10.**
- g. d. Cypress, pine and eucalyptus trees along the bluffs shall be preserved and protected to the greatest extent feasible.

Modification 4

Policy 30231.1:
(page 210)

In order to protect identified Campus wetlands, **environmentally sensitive habitat areas** and coastal waters from sediment transfer or contamination from urban run-off during construction, the following grading and erosion control practices shall be followed:

Modification 5

Policy 30231.2:
(page 212)

Projects shall be designed to minimize soil erosion and, where possible, to direct surface runoff away from coastal waters, **environmentally sensitive habitat areas** and wetlands, according to the following policies:

n. Runoff from parking areas and from University Road on the Main Campus shall be directed to drainage structures. Traps, filters and earth drainage swales with high-uptake native vegetation for roadway and parking lot contaminants shall be provided as part of the drainage structures.

Modification 6

Figure 26: Coastal Access Improvements:
(page 163)

Update Figure 26 to illustrate proposed pedestrian paths along Mesa/University Road and the Goleta Slough bluffs.

Modification 7

Policy 30210.20

(page 168)

Public pedestrian paths and scenic overlooks along the bluff top and base of the Goleta Slough bluffs shall be clearly signed as available public trails for pedestrian use only. Pedestrian pathways shall, by design, discourage bicyclist from use of the trails and trails located on the Goleta Slough bluff face shall be limited to 5 ft. in width. Campus visitors shall made aware of all available pedestrian paths on the campus by measures to include, at minimum, signage and campus visitor maps.

III. FINDINGS FOR THE APPROVAL OF THE LONG RANGE DEVELOPMENT PLAN IF MODIFIED AS SUGGESTED

The following findings support the Commission's denial of the LRDP amendment as submitted, and approval of the LRDP amendment if modified as indicated in Section II (*Suggested Modifications*) above. The Commission hereby finds and declares as follows:

A. Amendment Description

The existing two lane University/Mesa Road is located along the northern perimeter of the Main Campus. As certified in the LRDP, the road will be expanded to four lanes. The proposed amendment request involves changing the location of 600 ft. of a 2,000 ft. long road expansion to locate it north of its presently approved blufftop location. The remaining 1400 ft. of the road will be in the same location as certified by the Commission.

The blufftop area is presently designated as ESHA in the LRDP, and the bluffs, which contain the campus' last native oak woodland, abut the Goleta Slough. The University is proposing to redesignate 1.9 acres of land that are presently designated as Open Space and Academic to ESHA. Of the 1.9 acres, approximately .5 acres only presently meets the Coastal Act definition of ESHA. The remaining 1.4 acres has no existing ESHA characteristics, although, the University proposes to create habitat values through enhancement.

The proposed 600 ft. change to the road will be located north of the current road in an area that was previously developed as a tank farm. The University is proposing to recontour this area by placing approximately 21,000 cubic yards of fill and retaining walls in its location. Upon completion of road construction, the University intends to restore the approximate .5 acre area. This .5 acre area is proposed as part of the land that will be redesignated to ESHA. Additionally, the University is proposing to include the development of pedestrian trails and look out areas along the top of the bluffs and at the base of the bluffs as part of the LRDP's access component.

A Notice of Impending Development (1-97) for a project which includes the development of the road expansion, pedestrian trails, viewing areas, parking improvements, and restoration of ESHA will be reported to the Commission at the May 1997 Commission Hearing. The base of the bluff, although within the University's planning area, is within the Commission's original permit jurisdiction. Therefore, in addition to the Notice of Impending Development, coastal development permit application 4-97-80 for the enhancement of a small area at the base of the bluffs is also scheduled at the May 1997 Commission Hearing.

B. Background

On March 17, 1981 the University's LRDP was effectively certified by the Commission. The LRDP has been subject to six major amendments. Under LRDP Amendment 1-91, the Commission reviewed and approved the 1990 UCSB LRDP; a 15 year long range planning document, which substantially updated and revised the certified 1981 LRDP. The 1990 LRDP provides the basis for the physical and capital development of the campus to accommodate a student population in the academic year 2005/06 of 20,000 and to expand the building area of the campus by 1.2 million square feet.

C. Environmentally Sensitive Habitat Area

The bluff area adjacent to the Goleta Slough on the Main Campus is defined by the existing LRDP as an ESHA because the bluffs support the last example of native oak woodland habitat on campus and the bluffs (inclusive of the oak woodland vegetation) also accommodate plant and animal species unique to this habitat type. In addition, the LRDP states that the bluffs are an important buffer that separate the Goleta Slough from the Main Campus. The Coastal Act defines ESHA in §30107.5 stating that:

environmentally sensitive area means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.

The Coastal Act mandates that ESHAs be protected against habitat disruption. Furthermore, the Coastal Act requires that development adjacent to an ESHA be sited and designed to prevent impacts that would degrade the ESHA value. Specifically, §30240 states:

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

(b) Development in areas adjacent to environmentally sensitive habitat areas shall be sited and designed to prevent impacts which would significantly degrade such areas and shall be compatible with the continuance of such habitat areas.

In addition, the Coastal Act requires that the biological productivity of wetlands be protected and, where feasible, restored. Section §30231 of the Coastal Act states that:

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, minimizing alteration of natural streams.

In the case of the LRDP, the University is proposing to redefine the certified ESHA maps as shown on *Figure 13*, an aerial photo, by changing the land use designation of a 1.9 acre area from Open Space and Academic to ESHA. The University is also proposing to allow pedestrian access along the top and base of the bluffs, within the area proposed to be designated as ESHA. Additionally, the University is proposing to amend LRDP Policy 30240(a).11 to state:

There shall be no construction on the Goleta Slough bluffs and bluff-top, consisting of everything designated as ESHA north of University Road.

In order to analyze the proposed amendment for consistency with the applicable Chapter 3 policies of the Coastal Act, it is necessary to: 1) review the policies and land use designations presently contained within the certified LRDP and the Coastal Act basis for the Commission's certification of them; 2) review the proposed amendment's supporting information; and, 3) compare the proposed LRDP amendment to the Chapter 3 policies of the Coastal Act.

1. LRDP Background

The proposed LRDP amendment which involves the change in location of 600 ft. of the roadway expansion and the redesignation of a 1.9 acre area from Academic and Open Space to ESHA is project-driven. There are two reasons for this: 1) the University wants to have a central Campus entrance that required a change in location of 600 ft. of the 2,000 ft. long road; and, 2) the University wants the Goleta Slough Bluff area to be aesthetically pleasing and in character with the wetland area it abuts. The actual development of the four lane road expansion has already been subject to the University's review, public participation and the CEQA process and the notice of the impending development is scheduled for the May 1997 Commission meeting. Staff notes that the University/Mesa Road expansion was certified by the Commission in 1980. When the road expansion was approved, the Commission reviewed conceptual drawings only and recognized in the LRDP [LRDP policy 30253.15(a)] that engineered plans would be drawn for the road prior to the University proceeding with development. Thus, the change in location of 600 ft. of the 2,000 ft. long road is the only portion of the road that is subject to this amendment request; the remainder of the road is consistent with the existing certified LRDP.

As stated in the certified LRDP, UCSB retains very little land on its three campuses that is considered to be in a natural state. The Main Campus is located on a marine terrace, most of which was graded to a depth of about eight feet prior to acquisition by the University. Land uses prior to University acquisition and Campus development include ranching, agricultural cultivation and a U. S. Marine Corps Air Base. Native plants and animals have been replaced by non-native plants and animals in many locations on Campus, particularly on the Main Campus. The environmentally sensitive habitat areas identified on the ESHA map (*Exhibit 6*) are relatively less disturbed and still provide habitat for native plants and animals. The bluff adjacent to Goleta Slough on the Main Campus forms a contiguous part of the slough habitat area and, as stated previously, supports the last example of a native oak community on Campus. According to the University staff, the bluff also accommodates plant and animal populations unique to the Campus. The bluff is protected from many sources of disturbance by University Road which separates the academic areas of the Campus from the bluff.

In certifying the UCSB LRDP, the Commission found that ESHAs should be defined by the following four categories: 1) areas that support plant or animals species which are officially classified as "Rare or Endangered" or "Fully Protected" by State or Federal agencies; 2) areas that support a large number and/or diversity of species. If such areas were lost, many species that are now regularly occurring would become locally threatened or disappear; 3) areas that represent the last example of a certain habitat type on Campus, the disappearance or major alteration of which would result in a loss of species that depend solely on the habitat type; or, 4) areas that provide unique opportunities for UCSB instruction and research.

By applying the criteria contained in the LRDP and by applying the Coastal Act definition which defines ESHA, in part, as any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem, the Goleta Slough Bluffs on the Main Campus were identified for inclusion in the LRDP as an ESHA. Thus, the LRDP includes specific policy language that precludes any development on either the Goleta Slough bluffs or between University Road and the bluff top. However, the road expansion was certified by the Commission for a location that encroached closer (approximately 10 feet) to the top of the bluffs than the road's current location. The LRDP policies which prohibit bluff top development thus appear to be in conflict with the approved road expansion. On the other hand, the certified LRDP does include expansion of the blufftop road, and LRDP *policy 30253.15(a)* states that future new development of the roadway expansion could potentially vary slightly in location during the project design phase.

2. Amendment's Supporting Information

In order to evaluate the potential impacts of the proposed road alignment on the adjacent ESHA, and proposed ESHA, the University hired consultants to perform a field survey and prepare a map of the location of plant resources on the Goleta Slough Bluffs and within the immediate vicinity of the bluffs. The vegetation communities mapped by the consultants included plant communities that did not meet the Coastal Act definition of ESHA. For instance, the consultants review also included ascertaining what potential impacts to the

bluffs would occur as a result of the entire project development -- the parking lot improvements and road expansion. For example, the consultant mapped four oak trees that were located between the developed tank farm area and the existing parking lot as an oak stand in a disturbed area. These oak trees would not alone meet the Coastal Act definition of ESHA, because they do not compose a habitat area, they are not rare or endangered. However, since the eventual development that will result after the LRDP is amended includes both the realignment of University and Mesa Road and the construction of parking the survey extended beyond the area subject of the LRDPA. The vegetation types that were found in the project vicinity were mapped and quantified (*Exhibit 8*). The consultants have provided the following approximate acreage of each vegetation type for the entire area as summarized in Table 1 below.

TABLE 1
VEGETATION ACREAGE

Vegetation Type	Acreage
Coast Live Oak Woodland	2.13
Eucalyptus Windrows	0.91
Coastal Sage Scrub	0.11
Willow/Riparian Scrub/Woodland	0.07
Coyote Brush Scrub	1.06
Ruderal/Disturbed	9.50
Ornamental Landscaping	0.16
Total	13.94

Given that the proposed amendment has been generated by the project design of the four lane road expansion and parking improvements, the area evaluated by the consultants to the University included areas of repeated disturbance such as roadsides and along the outer edges of parking lots. Areas of disturbance, which are the dominant vegetation type of the project site, as quantified in Table 1, are composed of ruderal, and other weedy species. The proposed amendment involves realigning 600 ft. of the road approximately 40 ft. north of its original location to an area that is currently developed. The developed area consists of the previous tank farm site which is approximately 30,000 sq. ft. in size.

3. Chapter 3 Analysis of Amendment

The University is proposing to amend the land use designation of a 1.9 area from Academic/Open Space to ESHA. Based on site visits and the information described above, staff has determined that part of the area, .5 acres, is ESHA and part of the area, 1.4 acres, is not ESHA. The .5 acres that is considered ESHA, pursuant to the Coastal Act definition, is located along the northern portion of the road expansion and includes Coast Live Oak Woodland. This area meets the Coastal Act definition in that it provides important habitat for local wildlife and it abuts the Goleta Slough. Thus, .5 acres of the proposed 1.9 acres

subject of the amendment request meets the Coastal Act definition because of its role in the ecosystem.

As stated previously, there are two reasons that the University is proposing to add 1.9 acres of land from Open Space and Academic to ESHA land use. First, the biological assessment that was performed for the area mapped the vegetation communities located on the Goleta Slough Bluffs. This map suggested that the bluffs bordering the Goleta Slough encompassed a broader ESHA (approximately .5 acres) than the ESHA mapped under the certified LRDP. Second, in conjunction with the road realignment, the University will be restoring 5.45 acres: 3.55 acres currently mapped as ESHA and 1.9 acres that is not mapped ESHA. Of the 1.9 acres that is not mapped as ESHA, approximately 1.4 acres is area that was either previously developed, is currently disturbed or is Eucalyptus trees. The University is proposing to redesignate the 1.9 acres as ESHA in order to insure that this area, after restoration and enhancement is protected in the future. A break down of the ESHA is quantified in Table 2 below.

Table 2
Goleta Slough ESHA

<i>Certified ESHA Land Use Area</i>	3.55 acres
<i>Actual ESHA - not mapped</i>	.5 acres
<i>Disturbed/Developed Area</i>	.5 acres*
<i>Existing Vegetation - not mapped as ESHA</i>	1.4 acres*
Total Proposed ESHA Land Use Area	5.45 acres

* approximate acreage

In comparing the proposed amendment against the Coastal Act, the Commission must determine whether the change to the LRDP is consistent with the Chapter 3 policies of the Coastal Act. §30240(a) requires that ESHAs be protected against any significant disruption of habitat values and that only resources dependent uses be allowed within such an area. The Coastal Act defines ESHA as a plant or animal or their habitat that is either rare or especially valuable, "because of their special nature or role in an ecosystem." The proposed change to the 600 ft. stretch of roadway will require the removal of four oak trees that are located in between an existing parking area and a previously developed tank farm area. Given that the location of the oak trees is in a developed and disturbed area, the Commission cannot find that the trees meet the Coastal Act definition of ESHA. However, the removal of Coast Live Oaks in conjunction with development in the Coastal Zone has been the subject of LCP policies and coastal development permit mitigation. The basis for the Commission's encouragement for oak tree mitigation and restoration of riparian and buffer areas is, in part, based on §30231 of the Coastal Act. §30231 requires that the

biological productivity wetlands be maintained and, where feasible, restored through, such measures as maintaining natural vegetation buffer areas that protect riparian habitats.

In reviewing Local Coastal Programs (LCPs), the Commission has certified policies that require that development which destroys habitat mitigate for that loss at increased ratios. For example, the Santa Barbara County certified LCP requires that oak trees removed in conjunction with development be replaced at a ratio of ten to one. Another example of a policy adopted by the Commission and used for guidance in review of development projects is in the Malibu/Santa Monica Mountains certified Land Use Plan (Malibu LUP). In the Malibu LUP, the Commission requires that all development be setback from ESHA and riparian corridors 100 ft.

§30240(b) of the Coastal Act requires that development in area adjacent to ESHA be sited and designed to prevent impacts that would degrade the value of the ESHA. As stated previously, the entire 2,000 ft. of road expansion encroaches as close as 10 ft. to the top of the Goleta Slough Bluffs. The University has submitted a Geotechnical Report that indicates that the bluffs are stable and that construction of the road would not adversely impact the stability of the bluffs. Staff of the University has stated that the bluffs were subject to landform alteration (cut) in the 1940s when development occurred at the base of the bluffs. As such, the area at the base of the bluff and the bluff face soil consist predominantly of bedrock. In spite of the removed topsoil, the bluff face east of the previously developed tank farm has revegetated itself with a healthy Coast Live Oak Woodland. Potential impacts that could result from the road expansion include bluff failure, removal of vegetation, soil erosion and contaminated run-off. The LRDP presently contains policy language designed to protect the slough and bluff area from the associated impacts of Campus development. However, the Commission finds that these policies must be strengthened in order to ensure that the development of the realigned road be designed in a manner that will prevent the above cited potential impacts that could significantly degrade the Goleta Slough habitat area. Thus, modifications #3 through 5 are suggested. In addition, modification #3 has been suggested to require the replacement of all oak trees that are removed in conjunction with the road expansion.

The University is also proposing to develop a pedestrian trail along the base and top of the bluffs. The predominate vegetation that is located on the bluff face consists of Coast Live Oak Woodlands. Given that the bluff area was subject to previous landform alteration, the bluff face itself consists predominantly of bedrock. Even though understory vegetation typical of oak woodlands occur under and around these trees, the bluff face is not completely vegetated. In addition, the base of the bluff, which was previously developed in the 1940s, consists also of bedrock type soil that is seasonally wet in certain locations. The biological assessment submitted by the University has indicated that the reason that the base of the bluff area would be wet at all is because the existing access road, located in this area, has acted as a collector of surface runoff from the parking lots located at the top of the bluff and, therefore, water does not properly drain into the wetland area.

The proposed pedestrian trail will in large part follow the alignment of an old roadway, a disturbed area and existing footpaths. As proposed in the LRDP, the trails will be sited and

designed so as not to disturb any of the existing ESHA. The only future improvements that will be required to open these trails are minimal erosion control measures, making of the trails and signs to inform pedestrians of the resource areas should not be walked in. The intent of the pedestrian trails at the base of the bluffs is to allow visitors, students and faculty the opportunity to enjoy the Goleta Slough. The trails are, therefore, resource dependent in that if the ESHA did not exist, it is likely the trails would not be developed. In order to ensure that the trails allow only passive use, such as pedestrians, and not uses that could adversely impact the plant or animal life or their habitats, modifications 2 and 7 are proposed.

Lastly, the University is proposing to redesignate 1.9 acres of land to ESHA from Academic and Open Space Land Uses. As described above, only part of the area (approximately .5 acres) subject to the designation change currently meets the Coastal Act definition of ESHA. As indicated on the biological survey map prepared by consultants for the University, the western .5 acres proposed for redesignation is vegetated with a Coast Live Oak Woodland that abuts the Goleta Slough. The eastern 1.4 acres is either developed, disturbed or contains a variety of different vegetation which include Eucalyptus trees, a few oak tree stands and ornamental landscaping. The rationale for the remaining acreage (approximately 1.4 acres) to be redesignated is because the University is intending to restore this area. The Commission finds that any restoration and enhancement work performed in this area will serve to benefit the adjacent ESHA and be consistent with §30240(b) of the Coastal Act.

The Coastal Act defines ESHA as either an area that contains a rare plant or animal or their habitat or an area that is especially valuable because of their special nature or role in an ecosystem. In addition, ESHA is defined as an area that could be easily disturbed or degraded by human activities and developments. Based on this definition, §30240 of the Coastal Act mandates that areas which meet the Coastal Act definition of ESHA be protected against habitat disruption. In past coastal development permit actions and in certification of local coastal programs, the Commission has designated areas as ESHA according to the resources that exist. The basis for consistency in mapping and designating ESHAs is because the protection of ESHAs from development is mandated by the Coastal Act. As stated in the Background, Section IV(C)(1) above, the certified LRDP currently contains mapped ESHAs that are manmade. Based on policies contained in the certified LRDP, the ESHA designation affords Campus ESHAs protection from disturbance and disruption of existing habitat values -- manmade or otherwise. Conflicts that occur as a result of designating an area ESHA that is currently not ESHA include the potential of the Commission prejudicing its ability to allow development in the mapped ESHA. With respect to the proposed LRDP, for instance, if at a later date the University wanted to remove the existing Eucalyptus trees and construct an interpretive center in their location, the proposal would be inconsistent with the LRDP if it were mapped as ESHA. It is therefore not appropriate to designate an area as ESHA, when in fact the area does not meet the Coastal Act definition of ESHA. After the proposed restoration occurs and the site functions as an ESHA as defined in the Coastal Act, then the University could propose an LRDP amendment to redesignate the area to ESHA. Therefore, suggested modification #1 is proposed to change the approximate 1.4 acre discussed above to Open Space ESHA Buffer Land Use Designation. The Commission finds that only as modified, is the proposed amendment to the LRDP consistent with the Chapter 3 policies of the Coastal Act.

D. Traffic, Circulation and Public Access

Coastal Act §30252 requires that the location and amount of new development maintain and enhance public access to the coast. Further Coastal Act §30210 mandates that the maximum public access & recreational opportunities be provided. Finally §30213 requires that lower cost visitor and recreational opportunities be protected, encouraged and, where feasible provided.

Coastal Act §30252 states:

The location and amount of new development should maintain and enhance public access to the coast by: (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Coastal Act §30210 states:

Maximum access, which shall be conspicuously posted and recreational opportunities shall be provided for all the people consistent with public safety need, and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

As certified in the LRDP, improvements to coastal access are identified, in part, by new road segments which are meant to eliminate conflicts between Campus and non-Campus traffic on the Main Campus. Other methods to improve public access presently employed by the University include extensions and improvements to Campus roads, pedestrian and bicycle systems, and additional parking and directional signs. The realignment of University Road/Mesa Road is the primary circulation improvement that is described in the LRDP.

In certifying the LRDP in 1980 and its subsequent 1991, amendment, the Commission found that improving the Campus' circulation was necessary and that the roadway realignment would improve coastal access along University Road, which is a primary auto access route to the coast. The University has indicated that Mesa/University Road will serve as the main arterial for the Campus and will be open at all times. As proposed under the LRDP, the University is not modifying the LRDP with respect to the creation of a perimeter road along the north bluffs of Main Campus -- simply changing 600 ft. of the road's location. The expansion of the roadway will improve campus circulation for students, teachers and coastal visitors. Therefore, the Commission finds that the proposed road realignment is consistent with the applicable new development and public access policies of the Coastal Act.

With regard to public access, the proposed LRDP is proposing to create two viewing areas and a pedestrian trail along the top and the base of the Goleta Slough Bluffs. The University is not proposing to eliminate public parking in this area of the campus. Therefore, the trail and viewing areas will provide a means of low cost recreation to members of the public to enjoy the Goleta Slough and abutting ESHA.

In past Commission action regarding public trails that are not located immediately adjacent to the ocean, the Commission has required policies of LRDPs and LCPs which ensure the public's ability to use trails. For example, in certifying the Pepperdine University LRDP, the Commission required that two trails which traversed undeveloped ESHAs of the campus property be offered as dedications for acceptance and improvement at a future date. Where conflicts between public access and coastal resources have occurred LCP policies have been approved which insure a balance of the two Coastal Act mandates. As discussed in the previous section regarding ESHAs, modification #7 is suggested in order to insure that the development of pedestrian trails and viewing areas are made available to the public in a manner that will not impact the ESHA by limiting the use of the trails to pedestrians only and by limiting the width of the new trails to 5 feet. Furthermore, to insure that the public is aware of trail and viewing opportunities along the Goleta Slough, modifications #6 is suggested. The Commission finds that the proposed LRDP, as modified, is consistent with the new development and public access policies of the Coastal Act.

E. California Environmental Quality Act.

Pursuant to §21080.9 of the California Environmental Quality Act ("CEQA"), the Coastal Commission is the lead agency responsible for reviewing Long Range Development Plans for compliance with CEQA. The Secretary of Resources Agency has determined that the Commission's program of reviewing and certifying LRDPs qualifies for certification under §21080.5 of CEQA. In addition to making the finding that the LRDP amendment is in full compliance with CEQA, the Commission must make a finding that no less environmentally damaging feasible alternative exists. §21080.5(d)(1) of CEQA and §13540(f) of the Coastal Code of Regulations require that the Commission not approve or adopt a LRDP, "...if there are feasible alternative or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment."

A Notice of Preparation ("NOP") was circulated on September 24, 1996 and a draft of the EIR was released for public review on October 30, 1996. Notice of the availability of the draft documents was sent to all organizations and individuals who had requested such notice, and was also published in the Santa Barbara News-Press (a newspaper of general circulation) and the Nexus, UCSB's campus newspaper. Pursuant to §13515(a), notice of the availability of the document was also given to potentially affected local governments and special districts, and state and federal agencies listed in Appendix A of the Local Coastal Program Manual. Copies of the draft document were made available at local public libraries and at the UCSB Library, and were provided at no charge to all individuals, community groups, state and local agencies, and University-affiliated groups who requested them.

The notice provided to interested parties began a 45-day public review and comment period, which ran until December 13, 1996. A noticed public hearing to receive comments on the draft EIR was held on November 20, 1996 at UCSB. Written comments were received from public agencies, organizations and individuals during the comment period.

For the reasons discussed in this report, the LRDP amendment, as submitted is inconsistent with the Chapter 3 policies of the Coastal Act, and that there are feasible alternatives or mitigation measures available which would lessen any significant adverse impact which the approval would have on the environment. The Commission has modified the proposed LRDP to include such feasible measures as will reduce environmental impacts of new development. As discussed in the preceding section, the Commission's suggested modifications bring the proposed LRDP amendment into conformity with the Coastal Act. Therefore, the Commission finds that the LRDP amendment, as modified, is consistent with CEQA and the Chapter 3 policies of the Coastal Act.

**EXHIBITS TO THE STAFF
REPORT ARE ATTACHED
SEPARATELY AS LISTED BELOW**

Regional Location Map	(Figure 1)
Local Vicinity Map	(Figure 2)
Campus Map, Project Location	(Figure 3)
Surrounding Land Use	(Figure 4)
Site Plan	(Figure 5)
Floor Plan	(Figure 6)
ESHA Boundary	(Figure 7)
Vegetation Communities	(Figure 8)
Proposed Campus Parking Structure	(Figures 9-11)
Land Use & Circulation Map	(Figure 10)
Aerial Photo - ESHA Boundary	(Figure 13)
ESHA Map	(Figure 28)
Land Use & Circulation Map	(Figure 30)
Letter in Opposition to Project	
Packet of Project Site Photos	

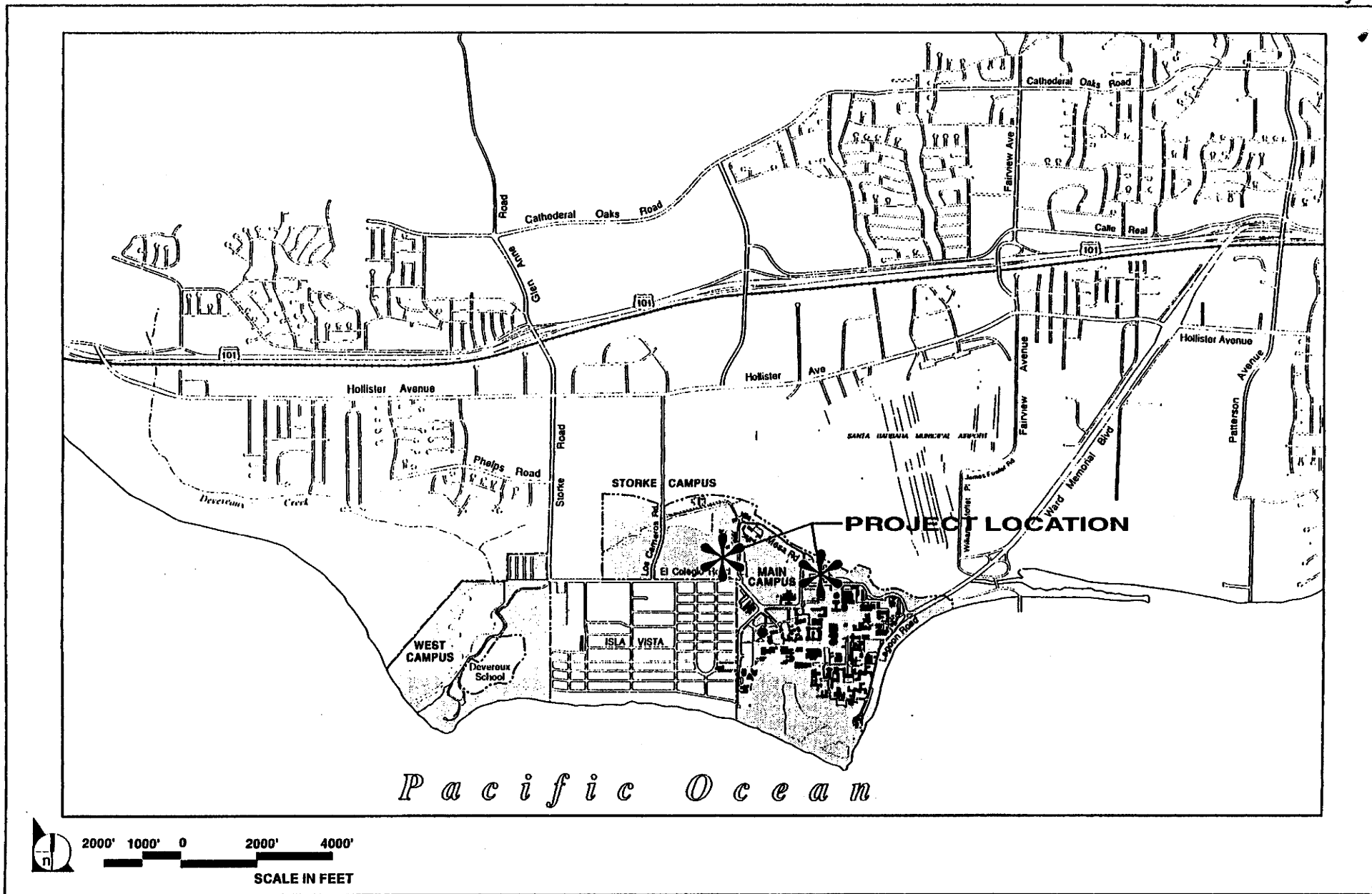
Coastal Commission Hearing May 13, 1997

Item 19b

*University of California, Santa Barbara
Long Range Development Plan Amendment 1-97*

EXHIBITS

Regional Location Map	(Figure 1)
Local Vicinity Map	(Figure 2)
Campus Map, Project Location	(Figure 3)
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Site Plan	(Figure 5)
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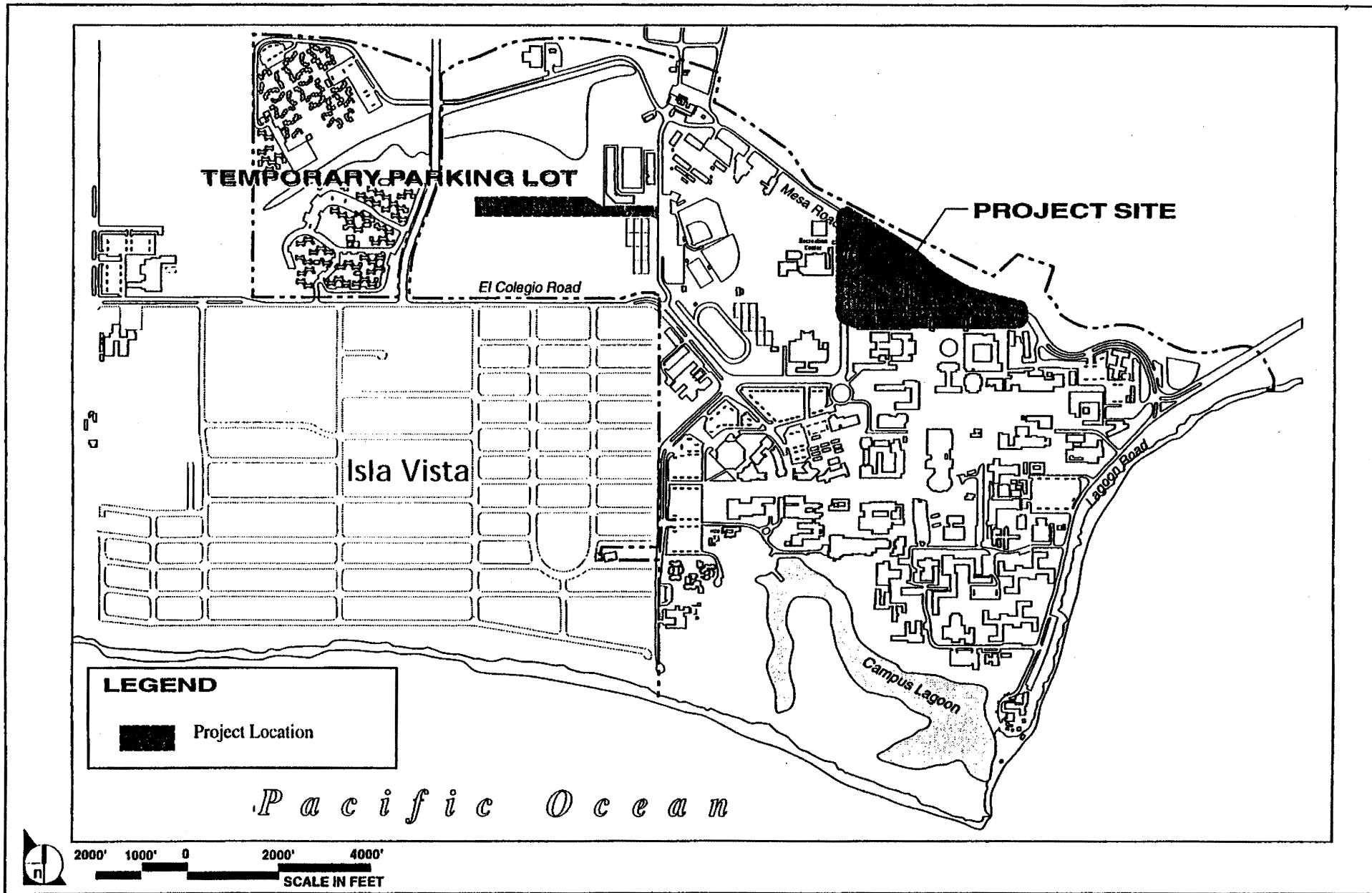


SOURCE: University of California at Santa Barbara (U.C.S.B.), 9/96.

FIGURE 1

Regional Location Map

UCSB PARKING STRUCTURE AND MESA ROAD/UNIVERSITY ROAD REALIGNMENT



SOURCE: University of California at Santa Barbara (U.C.S.B.), 9/96.

FIGURE 2

Local Site Vicinity

UCSB PARKING STRUCTURE AND MESA ROAD/UNIVERSITY ROAD REALIGNMENT



FIGURE 3

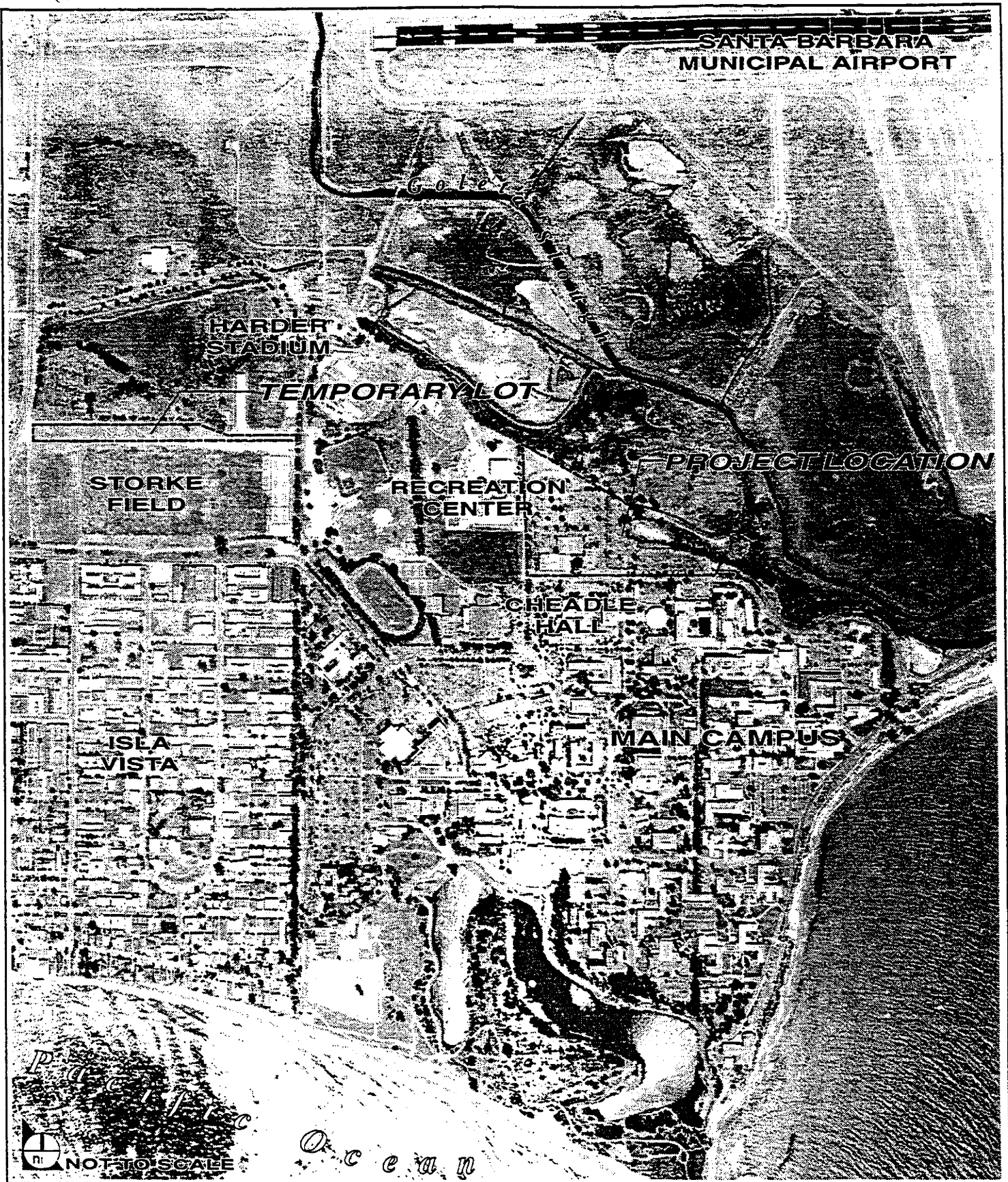


FIGURE 4

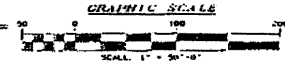
Surrounding Land Use

U.C.S.B. PARKING STRUCTURE I

903 STALLS IN PARKING STRUCTURE
 1041 STALLS ON GRADE
 1944 TOTAL STALLS
 800 NET NEW STALLS



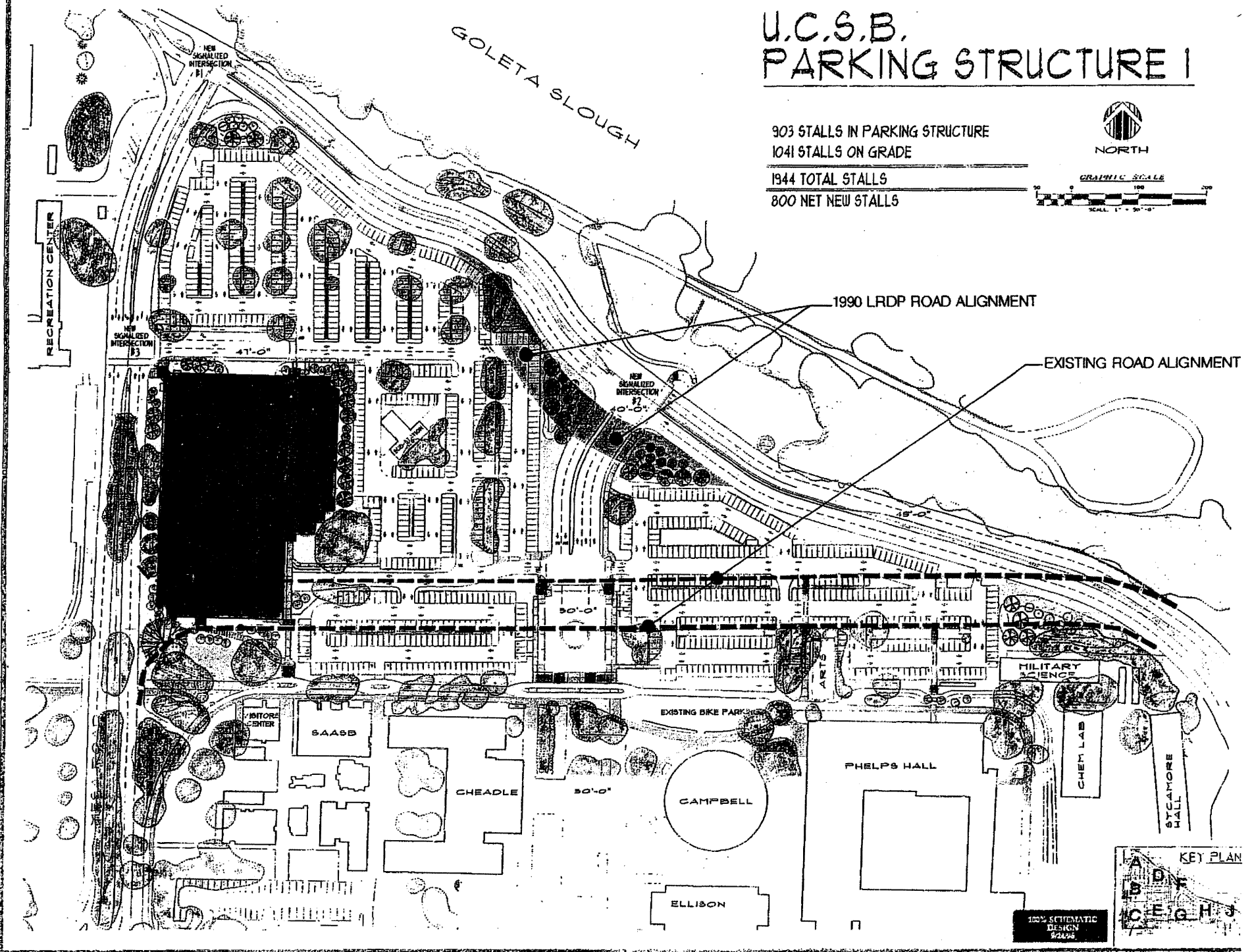
NORTH



GOLETA SLOUGH

1990 LRDP ROAD ALIGNMENT

EXISTING ROAD ALIGNMENT

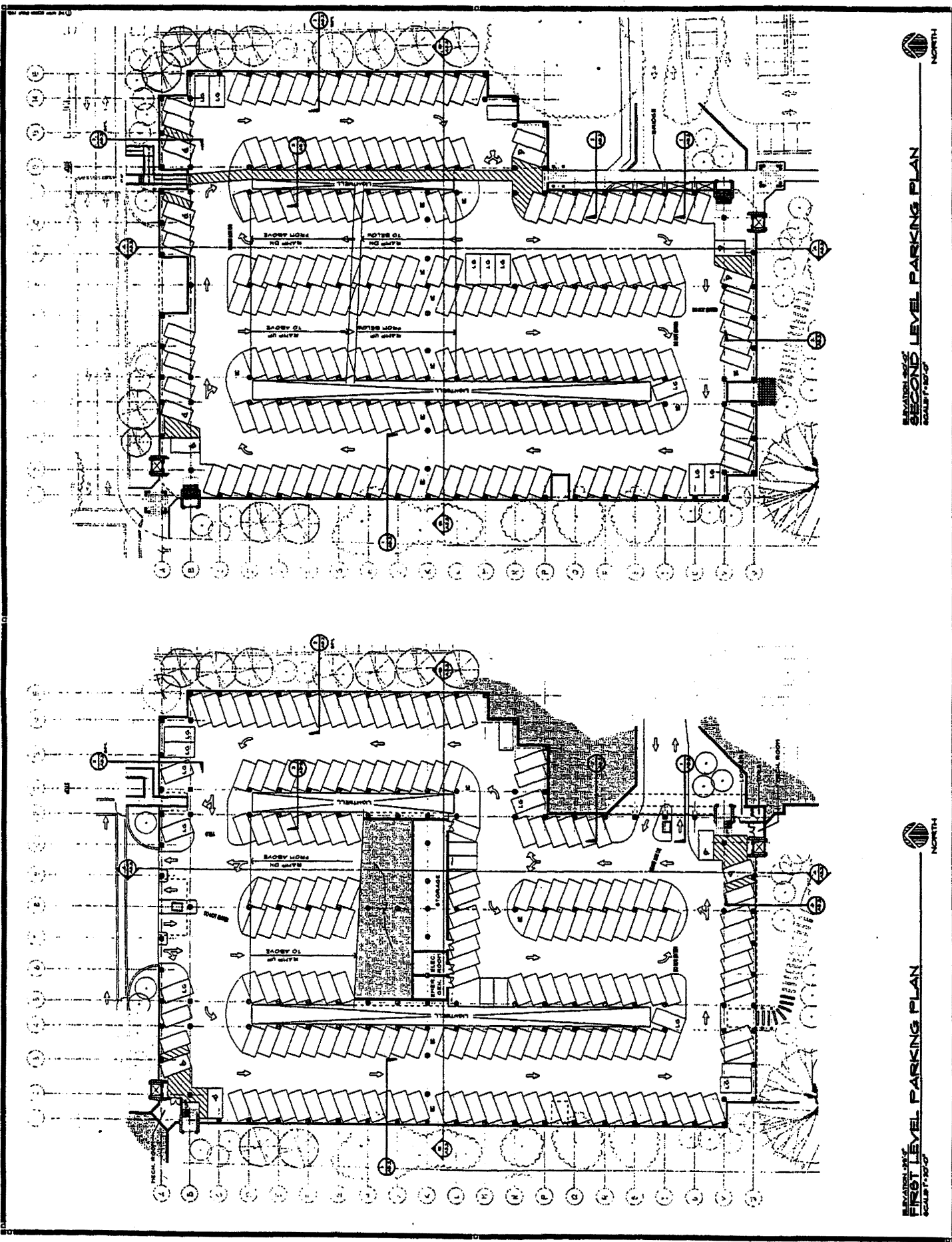


100% SCHEMATIC DESIGN
 9/24/96

FIGURE 5

SITE PLAN

UCSB/CAMPUS PARKING STRUCTURE



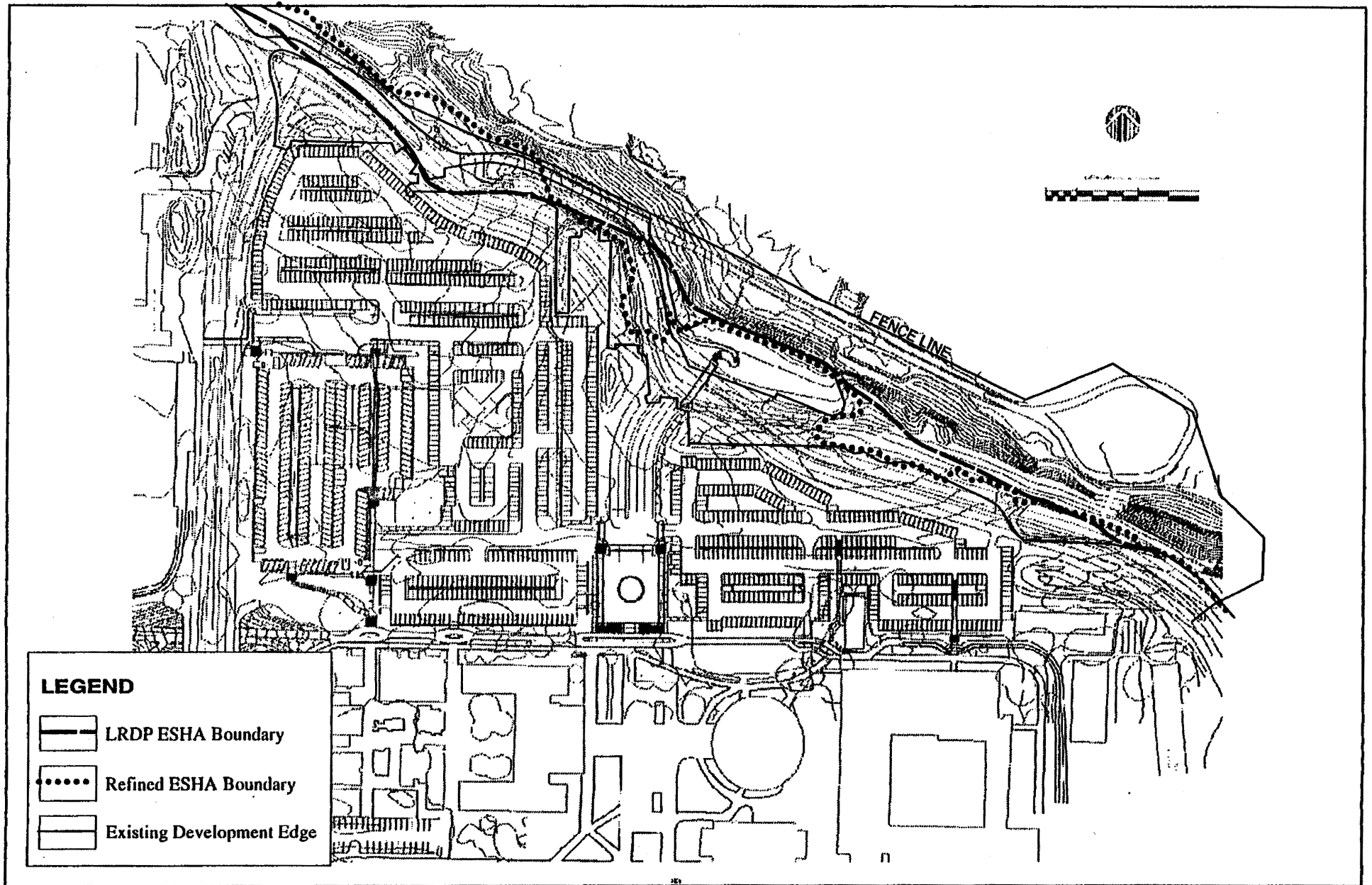
FIRST LEVEL PARKING PLAN
SCALE 1/8" = 1'-0"

SECOND LEVEL PARKING PLAN
SCALE 1/8" = 1'-0"






FIGURE 6

FLOOR PLAN



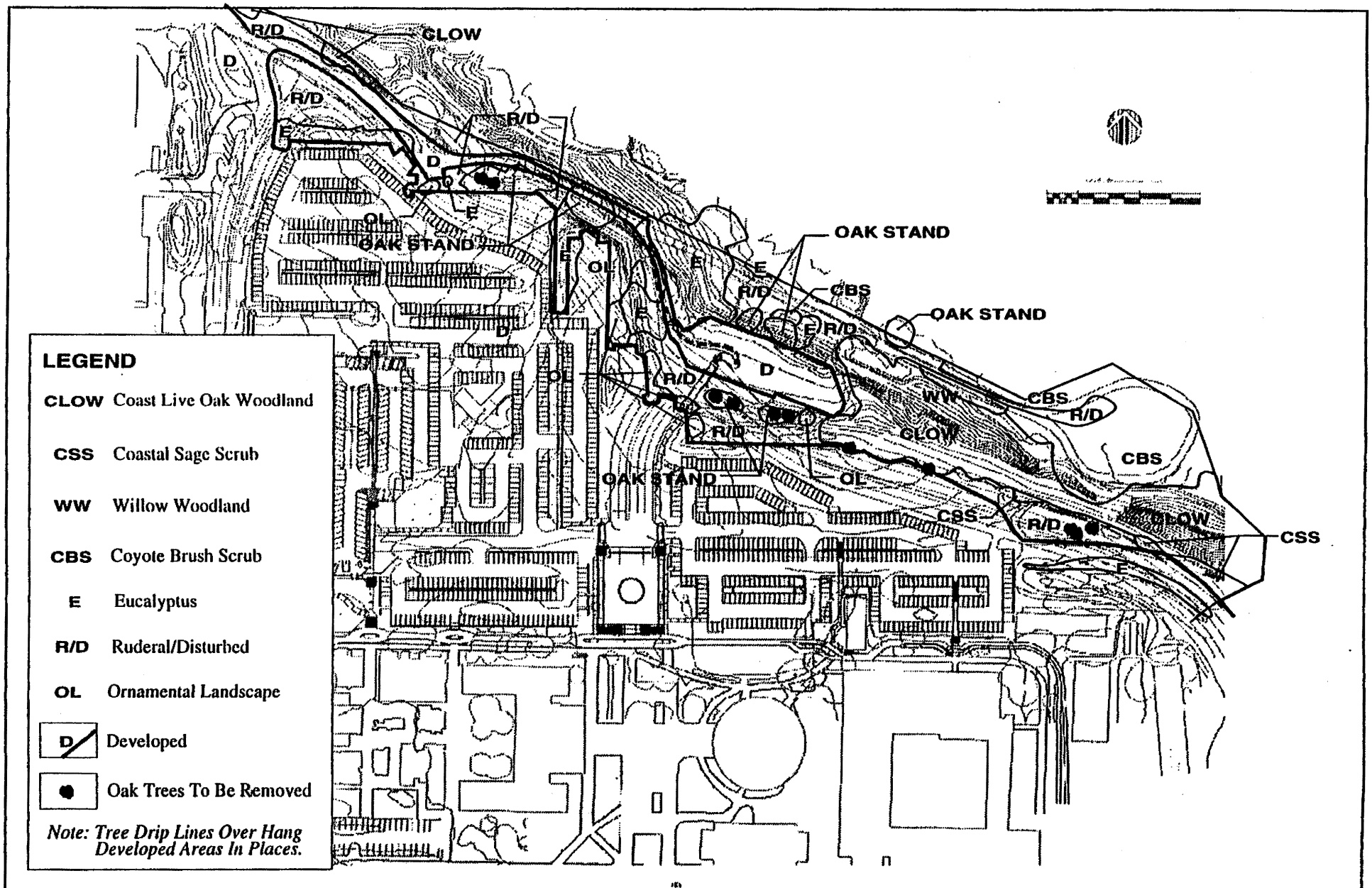
LEGEND

-  LRDP ESHA Boundary
-  Refined ESHA Boundary
-  Existing Development Edge

SOURCE: Impact Sciences, Inc., 10/96.

FIGURE 7

ESHA Boundary



SOURCE: Impact Sciences, Inc., 10/96.

FIGURE 8

Vegetation Communities

UCSB PARKING STRUCTURE AND MESA ROAD/UNIVERSITY ROAD REALIGNMENT

UCSB/CAMPUS PARKING STRUCTURE I

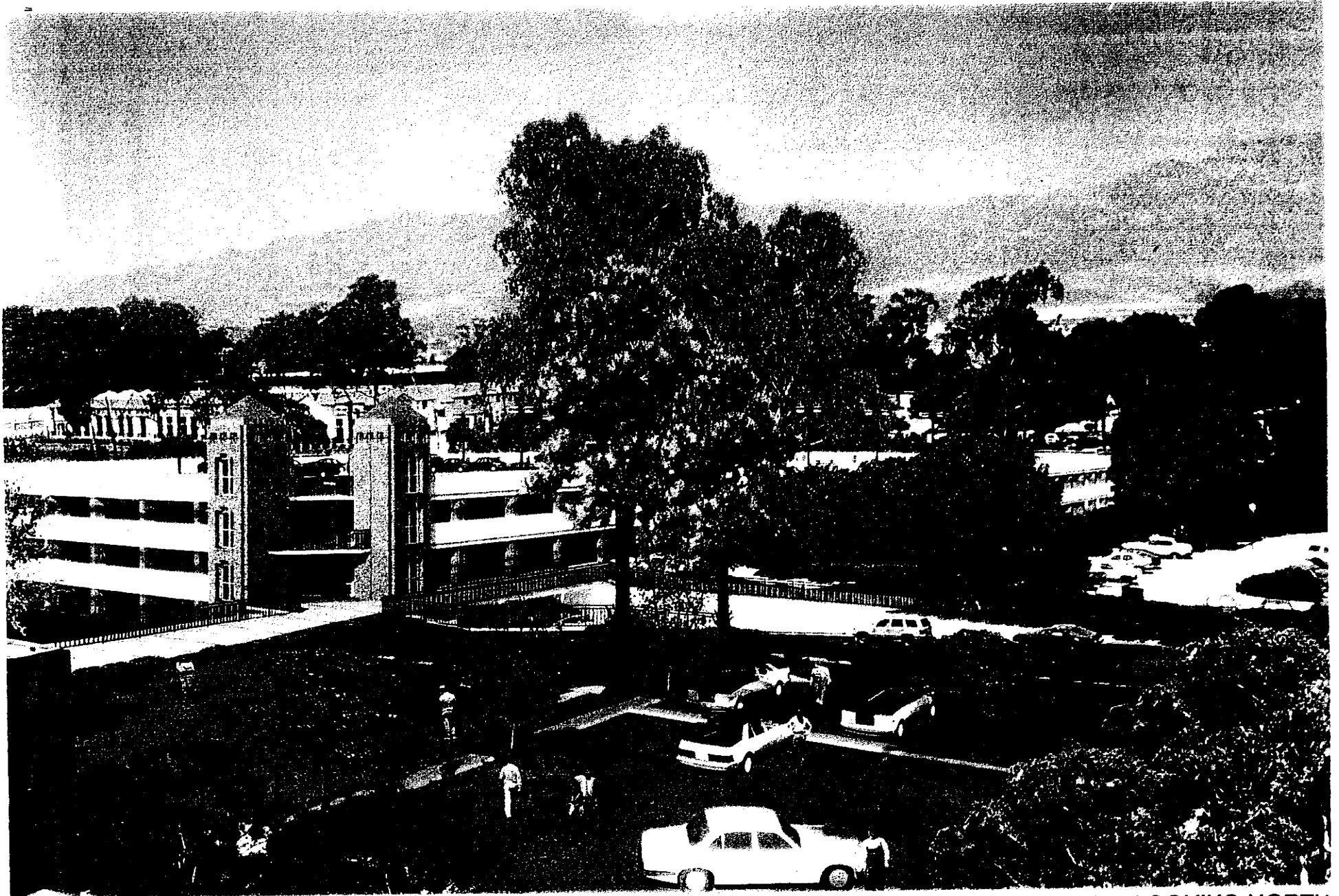


FIGURE 9

VIEW FROM CHEADLE HALL-LOOKING NORTH

UCSB/CAMPUS PARKING STRUCTURE I

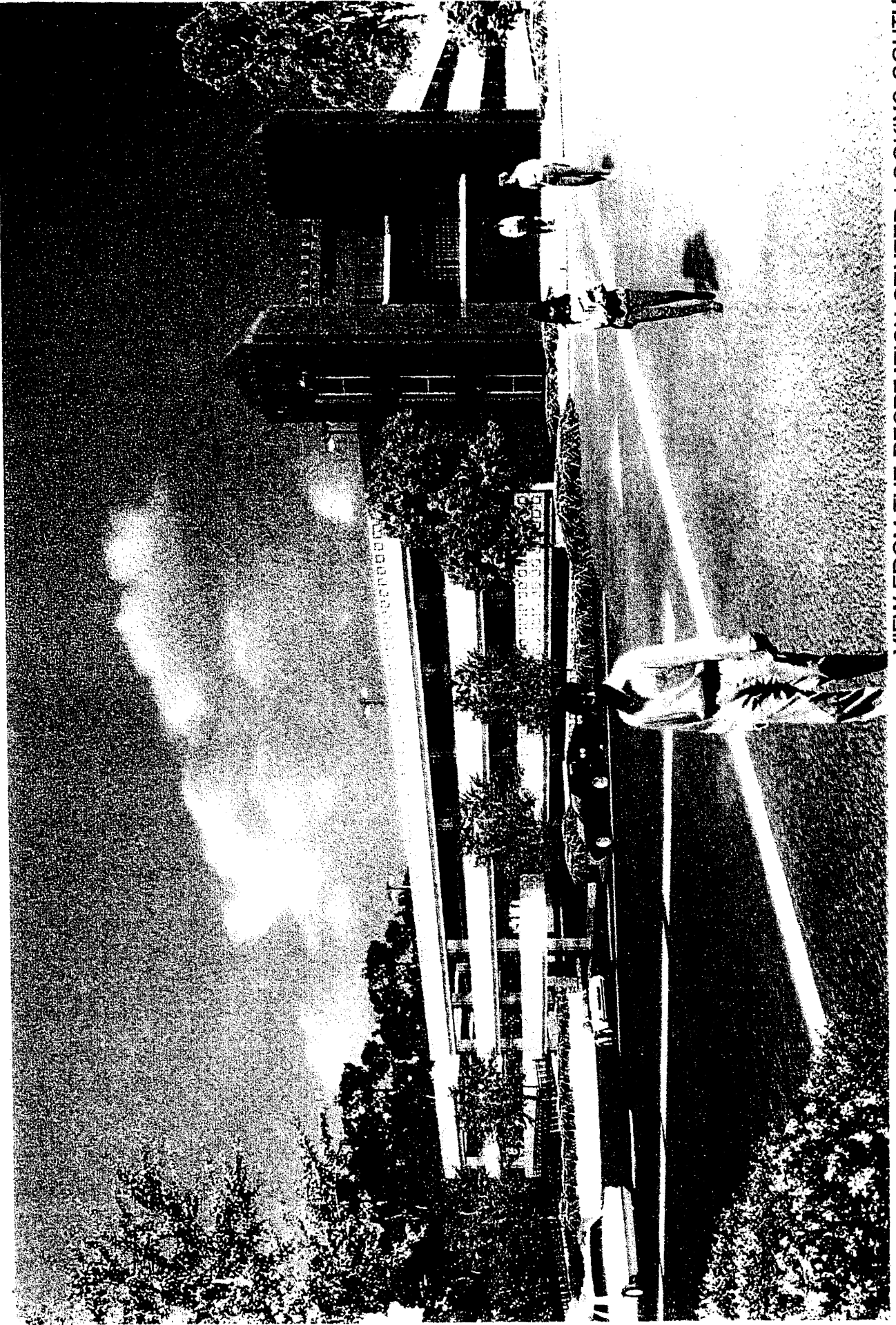


FIGURE 10

VIEW FROM THE RECREATION CENTER-LOOKING SOUTH



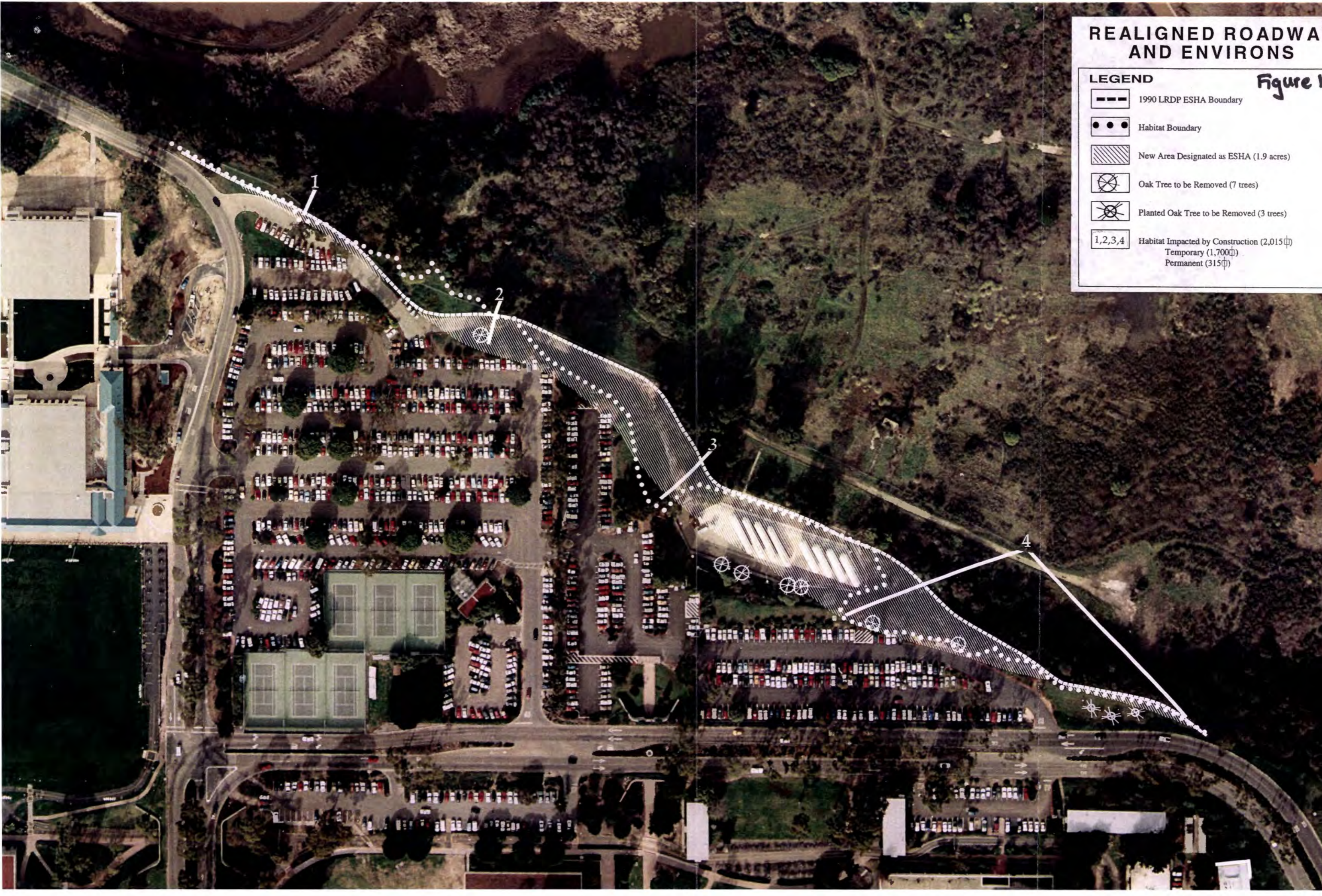
UPDATED DECEMBER 1994

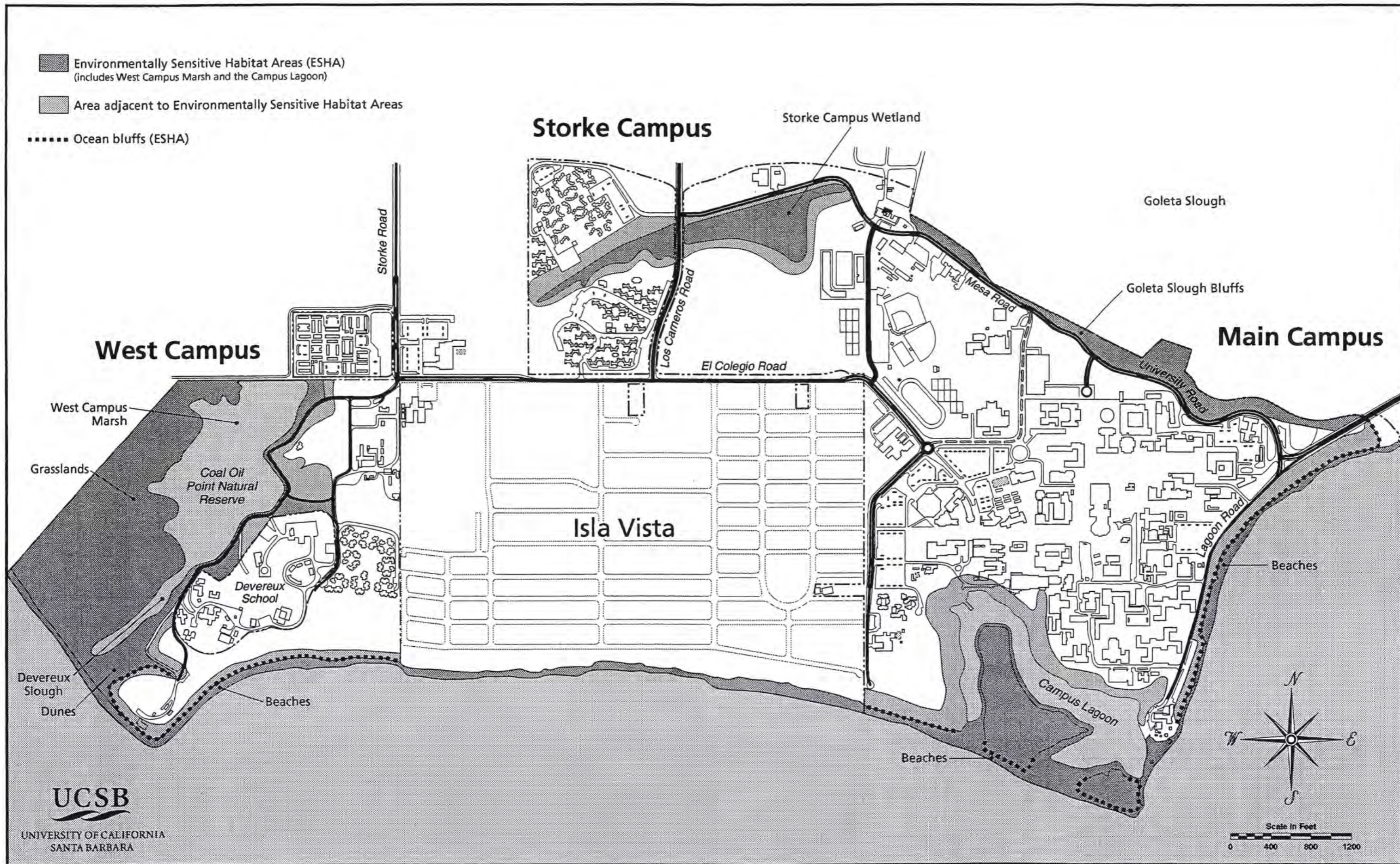
FIGURE 10 Land Use and Circulation

REALIGNED ROADWAY AND ENVIRONS

Figure 13

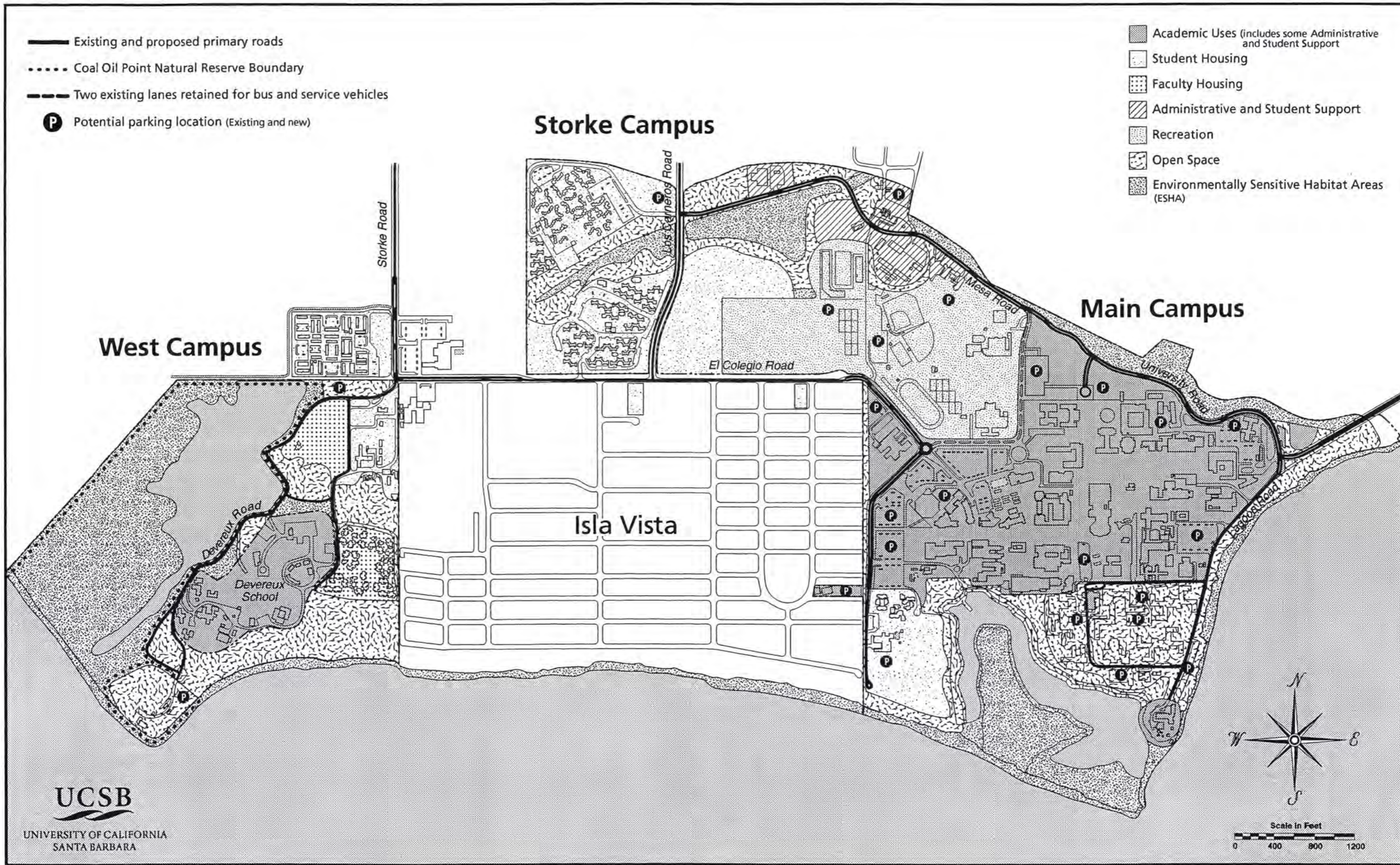
- LEGEND**
- 1990 LRDP ESHA Boundary
 - Habitat Boundary
 - ▨ New Area Designated as ESHA (1.9 acres)
 - ⊗ Oak Tree to be Removed (7 trees)
 - ⊗ Planted Oak Tree to be Removed (3 trees)
 - 1,2,3,4 Habitat Impacted by Construction (2,015⊐)
Temporary (1,700⊐)
Permanent (315⊐)





UPDATED JANUARY 1997

FIGURE 28 Environmentally Sensitive Habitats



UPDATED JANUARY 1997

FIGURE 30 Land Use and Circulation 165 LRD

April 18, 1997



RECEIVED
APR 22 1997
CALIFORNIA
COASTAL COMMISSION

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: UCSB Mesa Road Realignment

This letter is submitted on behalf of the Audubon Society regarding UCSB's proposal to amend its Long Range Development Plan ("LRDP") to allow the construction of a new parking structure and realignment of Mesa Road. Audubon is primarily concerned with the project's impacts to Environmentally Sensitive Habitat Areas (ESHA) within and adjacent to the proposed new roadway alignment.

Environmentally Sensitive Habitat Areas

The Coastal Act requires that:

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

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas."

(Public Resources Code Section 30240; hereinafter "Coastal Act.")

(a) Redesignation of ESHA

The basis for the University's proposed redesignation of ESHA is unclear. Despite our requests, the University has not provided us with a copy of the evidence in support of the new proposed ESHA designation. The Coastal Commission should



April 18, 1997

California Coastal Commission - UCSB Mesa Road Realignment

Page 2

carefully review the new area proposed for ESHA designation and confirm whether it is biologically accurate. As a preliminary matter, the Commission should ask the University to describe the habitat characteristics of Segments 1, 2, 3, and 4 of Figure 13. (See attached.)

According to Audubon's site inspections, the area identified by the University as being permanently affected ESHA may not actually qualify as ESHA. These areas are located within Segments 1 and 3 of the proposed roadway. The vegetation identified as ESHA within Segment 3 of the roadway consists of eucalyptus and other exotic plants. Why are they considered ESHA? Similarly it is unclear to Audubon why the University has identified ESHA within Segment 1 of the proposed roadway. The Commission should ask the University to explain why these areas are designated ESHA before including them in the new ESHA designation.

Audubon also questions the designation of currently degraded and developed areas as "new" ESHA. The most dubious area proposed for a new ESHA designation is the existing tank farm area north of the bluff. While it may be appropriate for the University to designate this area for restoration or enhancement, it is not appropriate to designate it as ESHA until the area truly functions as ESHA. (See Coastal Act Section 30107.5: "'Environmentally sensitive area' means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.") Therefore, the areas designated ESHA in the LRDP amendment should be limited to those areas that currently function as ESHA. Pursuant to Coastal Act Section 30240(a), no development should be allowed in these areas.

(b) Development Within ESHA

According to the University's application, a portion of the new road would be developed within ESHA. If these road segments truly are within ESHA (see comment above), they must be moved to avoid the ESHA. (Coastal Act Section 30240(a).)

(c) Development Adjacent to ESHA

Under Section 30240(b), development of the road must not impact or significantly degrade the adjacent habitat areas. The eastern portion of the road in Section 4 (Figure 13), from the eastern edge of current Parking Lot 13 to the easternmost edge of the new roadway alignment, will significantly impact the adjacent oak woodland habitat areas by (1) the encroachment of construction activities within the ESHA, and (2) the lack of a buffer to protect the habitat from ongoing degradation. For instance, coast live oak feeder roots extend well beyond the tree's dripline, and are therefore subject to compaction, fill and/or excavation associated with the construction and operation of the road. Additionally, the lack of a buffer will exacerbate the environmental effects of the project,

including glare from automobile lights, litter entering the ESHA, and non-point source pollution entering the Goleta Slough. These impacts could be avoided or mitigated through the following measures: (1) moving the road further south to provide a buffer for construction and ongoing effects; (2) providing construction fencing (preferred fencing to consist of plastic orange construction fencing supported by metal stakes); and (3) providing daily monitoring by a qualified independent monitor during all construction activities. Any residual impacts of construction should be mitigated through implementation of the proposed North Bluff Enhancement Project. Moving the road further south in this section would not result in the loss of any parking spaces. (Starting from the project's eastern edge and moving westward, Post 1 would remain where it is, against the guardrail; Post 2 would be moved 2 feet south; Posts 3-7 would be moved 4 feet south; Post 8 would be moved 2 feet south; and Post 9 would remain as proposed at the edge of the existing Parking Lot.)

A further 4-foot buffer from the easternmost edge of the project to the eastern edge of present Parking Lot 13 is also necessary to protect the geologic stability of the bluff and to avoid the need to construct future reinforcements that would further degrade the ESHA in this area.¹ As stated in the April 14, 1997 Fugro letter commissioned by the University, the stability of the bluff north of the road is dependent upon the viability of the vegetation on the bluff and slope. If the road is constructed too close to the vegetation, particularly the oak woodland area, the vegetation will be threatened and the long-term viability of the slope will be jeopardized. Therefore, to ensure the integrity of the bluff and slope, an adequate buffer must be provided between the road and the oak woodland habitat area.

According to the University's Notice of Impending Development and Determination of LRDP Consistency, the Commission staff has recommended a Suggested Modification to ensure that the bluff will be protected from future reinforcement devices. The Suggested Modification would revise LRDP Policy 30240(a).11 to state:

"b. Should bluff failure occur, University Road shall be realigned south of the bluff face; the construction of retaining walls or other forms of remediation on the bluff face ESHA area shall not be allowed unless it is determined that there is no feasible less environmentally damaging alternative."

Audubon would support this Suggested Modification if the last phrase ("unless it is determined that there is no feasible less environmentally damaging alternative") is deleted. This phrase renders the prohibition against construction of retaining walls or

¹ The Coastal Act requires that "New development shall...Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs." (Section 30253(2).)

other forms of remediation in the ESHA totally meaningless. According to language suggested by Commission staff, the University could simply say that moving the road south is infeasible, and the protection of the bluff and ESHA will be lost forever. Therefore, this policy should be revised to state: "Should bluff failure occur, University Road shall be realigned south of the bluff face; the construction of retaining walls or other forms of remediation on the bluff face or within the ESHA area shall not be allowed."

Maximum Feasible Mitigation and Alternatives

The California Environmental Quality Act (CEQA) prohibits the Commission from approving a project if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the project may have on the environment impacts. (Public Resources Code §21080.5(d)(2)(A).) Several mitigation measures and alternatives are available to mitigate the project's impacts to protected ESHA. As stated above, the eastern segment of the road could simply be moved slightly to the south to avoid impacting the habitat areas and to provide an adequate buffer. This mitigation could be accomplished without losing any parking spaces.

If the road is moved significantly to the south to provide greater protection to the ESHA, with a resulting loss of parking spaces, the following alternatives are available to make up for such loss:

- (1) Expand the parking structure to the southeast where the stone pines are located;
- (2) Reduce parking demand by enforcing the University's two-mile restriction on parking. Although the University currently enforces its parking restriction for quarter parking passes, it does not enforce the parking restriction with respect to daily passes. According to the EIR for this project, moving the road to avoid the ESHA may result in the loss of 25-30 parking spaces. It is highly likely that at least 30 persons that utilize daily passes to park on campus live within two miles. Instituting a mechanism to enforce this policy of the LRDP would significantly reduce parking demand on campus. For example, at the beginning of each quarter, students who live more than two miles from campus could obtain a sticker to place on their student ID cards that would enable them to purchase daily parking permits.
- (3) Provide bus passes to staff and faculty, similar to those that are provided to students. The current cost of an annual student bus pass is \$30; providing the same service to staff and faculty would require a minimal

expenditure (\$30 for a bus pass versus \$800 to build a vehicle parking space). If the cost is too great, the University could make the bus passes available to staff and faculty at an annual cost of \$30 (the equivalent of six parking days on campus). It is highly likely that at least 30 staff and faculty members would subscribe to this program.

- (4) Upgrade the bicycle paths and racks on campus. Again, bike racks are much cheaper to provide than parking spaces. According to the 1990 LRDP, the University is required to provide 2,200 new bicycle racks. The University has not provided us with requested information regarding the number of new bicycle racks provided since 1990; however, bicycle parking spaces on campus are woefully inadequate and some students do not ride their bikes because the University will confiscate bikes that are not parked in designated racks. Encouraging bicycle use by providing safe bike paths and adequate numbers of bike racks would help reduce parking demand.

Other additional mitigation measures that are necessary to ensure the protection of the ESHA:

- (1) Plant high-uptake native vegetation, including *juncus*, *eleocharis*, and *carex*, in the earth drainage swale to ensure more effective filtering of pollutants;
- (2) Plant native trees and shrubs in the cypress windrow;
- (3) Provide long-term (e.g. ten years) monitoring of existing and planted oaks to ensure survival and regeneration;
- (4) Provide a permanent half-time steward to manage the ESHA. The role of the steward would be consistent with the University's administration of its Natural Areas Plan and would be to (a) maintain the natural resources of the area; (b) monitor the use of trails; (c) coordinate research and education activities, including tours of the area; and (d) provide interface with the Goleta Slough Management Committee; and
- (5) Limit the pedestrian trail through the oak grove on the bluff face to a maximum width of six feet.

Conclusion

Thank you for your consideration of these comments. The Commission must ensure that the University's proposed LRDP Amendment conforms to the ESHA

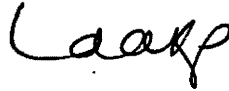
April 18, 1997

California Coastal Commission - UCSB Mesa Road Realignment

Page 6

protections set forth in the Coastal Act. Both temporary and permanent protection of the ESHA are feasible with implementation of the measures described above.

Sincerely,



Linda Krop
Senior Staff Attorney







cc: Rebecca Richardson, CCC Staff
UCSB Budget and Planning
Wayne Ferren, UCSB
Audubon Society



Add 4' buffer

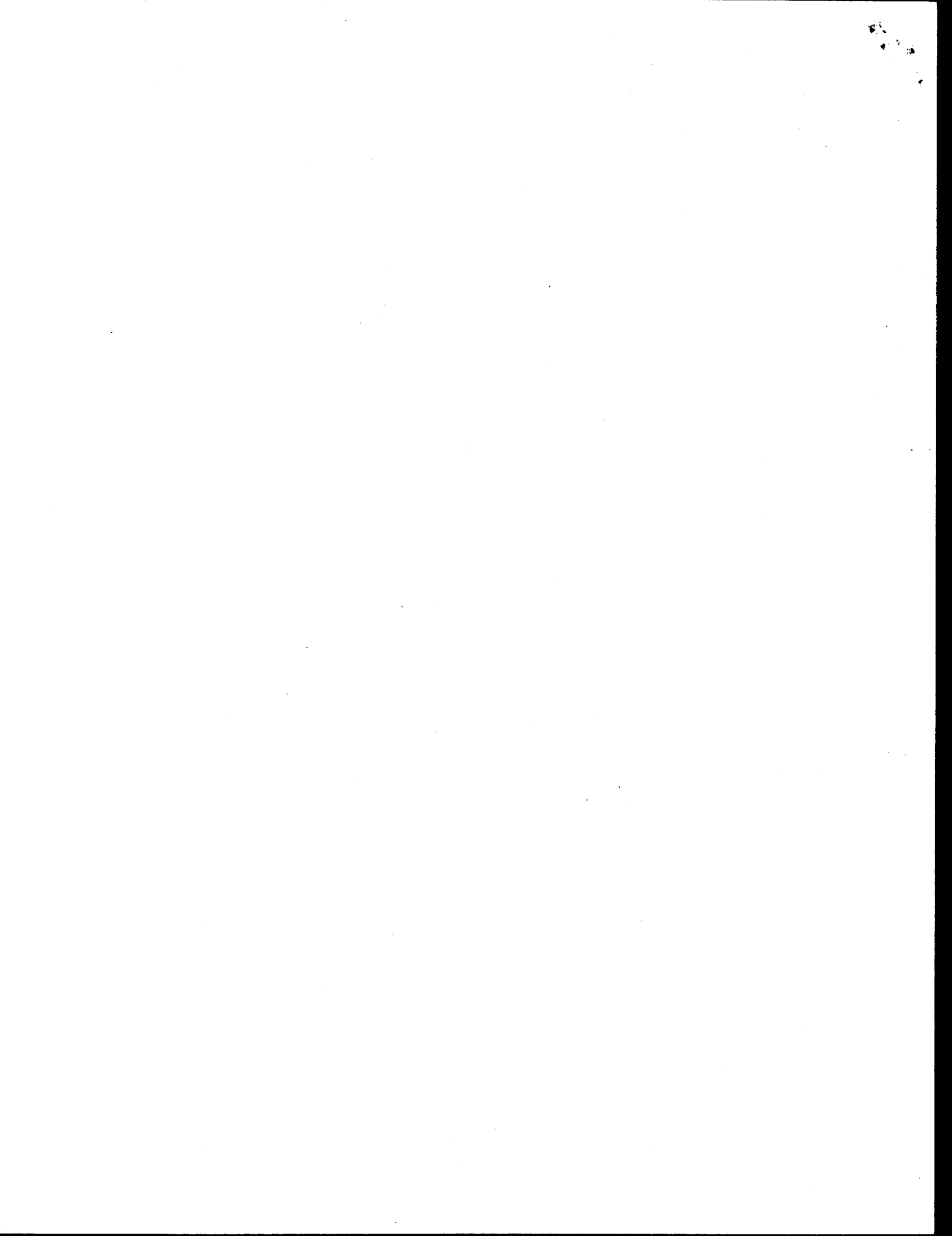
REALIGNED ROADWAY AND ENVIRONS

LEGEND

	1999 LADP ERIA Boundary
	Relief Boundary
	Open Area Designated in ERIA (1's area)
	Out Type to be Removed (2' area)
	Planned Out Type to be Removed (2' area)
	12.5.1

Modified Requirements by Commission (2011) to
 Emergency (1/1/2012)
 Resolution (1/1/12)

FIGURE 13





UCSB PARKING STRUCTURE—MESA ROAD/UNIVERSITY ROAD REALIGNMENT

 **IMPACT SCIENCES, INC.**
FEBRUARY 1997

ESHA DEFINITION

The bluff area adjacent to the Goleta Slough on the main campus was defined by the University of California, Santa Barbara 1990 Long Range Development Plan (LRDP) as an Environmentally Sensitive Habitat Area (ESHA) for two reasons. First, this area supports the last example of native oak woodland habitat on campus and the bluffs (inclusive of oak woodland vegetation) also accommodate plant and animal populations unique to this habitat type. Review of the EIR prepared for the LRDP define these species and indicate that they are generally associated with oak woodland habitat and include goldenback fern, California polypody, venus hair fern, California fuchsia, California quail, plain titmouse, wrentit, Hutton's vireo, acorn woodpecker and variety of raptors, mammals and amphibians that are also associated with, or limited to, oak woodland habitat. Second, the LRDP states that the bluffs are an important buffer that separate the Goleta Slough from the main campus.

In reviewing and refining the limits of the ESHA as well as potential short- and long term project impacts, each of the ESHA concepts or criteria were considered. For example, the refined ESHA boundary not only considers the limits of the oak woodland but defines the top-of-bluff as the limit of the buffer that must be considered as part of this planning and environmental review process.

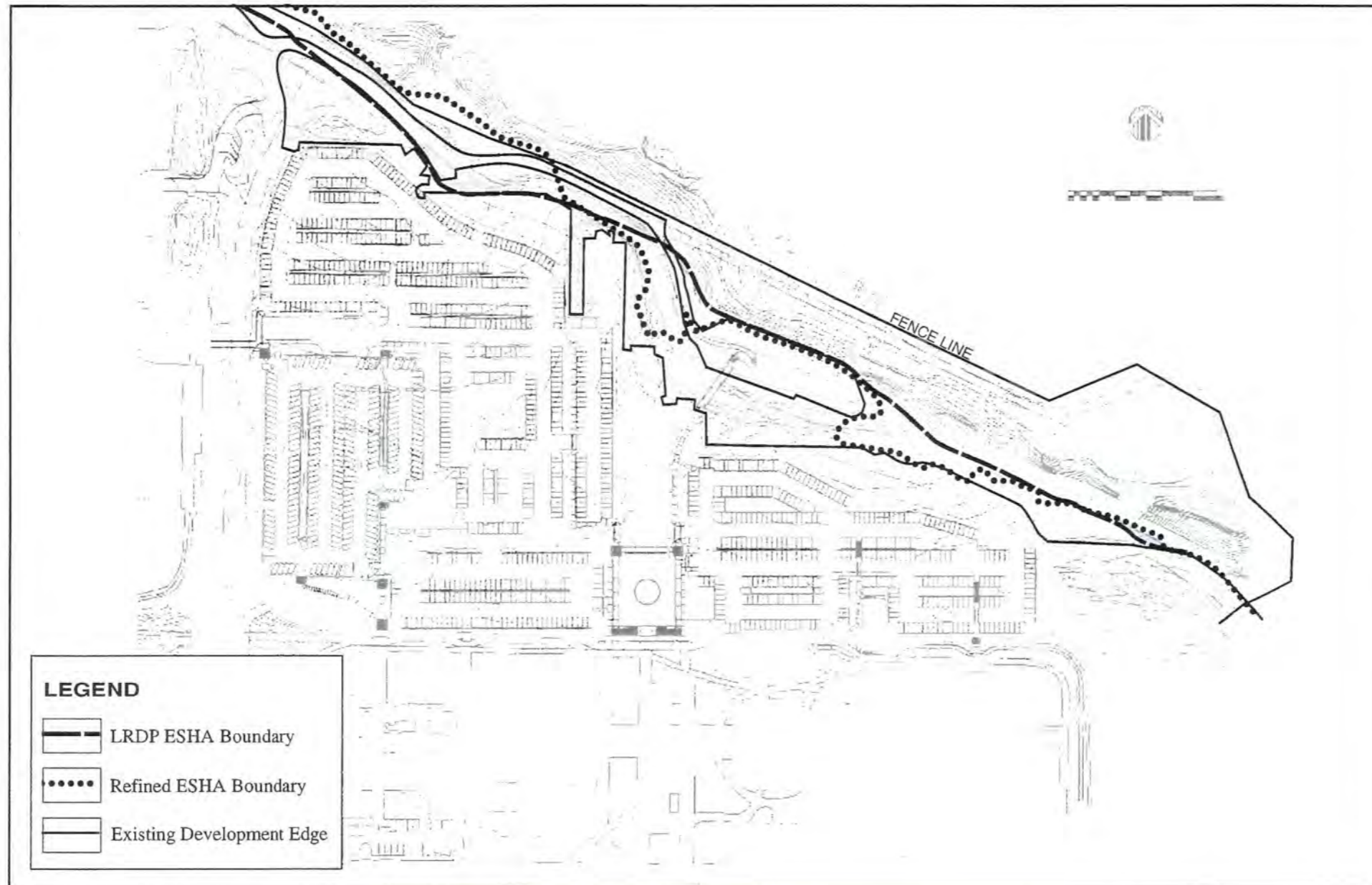




PHOTO 1
Views from this location of the project site are to the north/northeast. The Goleta Slough is visible in the foreground, and the Santa Barbara Municipal Airport and the Santa Ynez Mountains are visible in the more distant background.

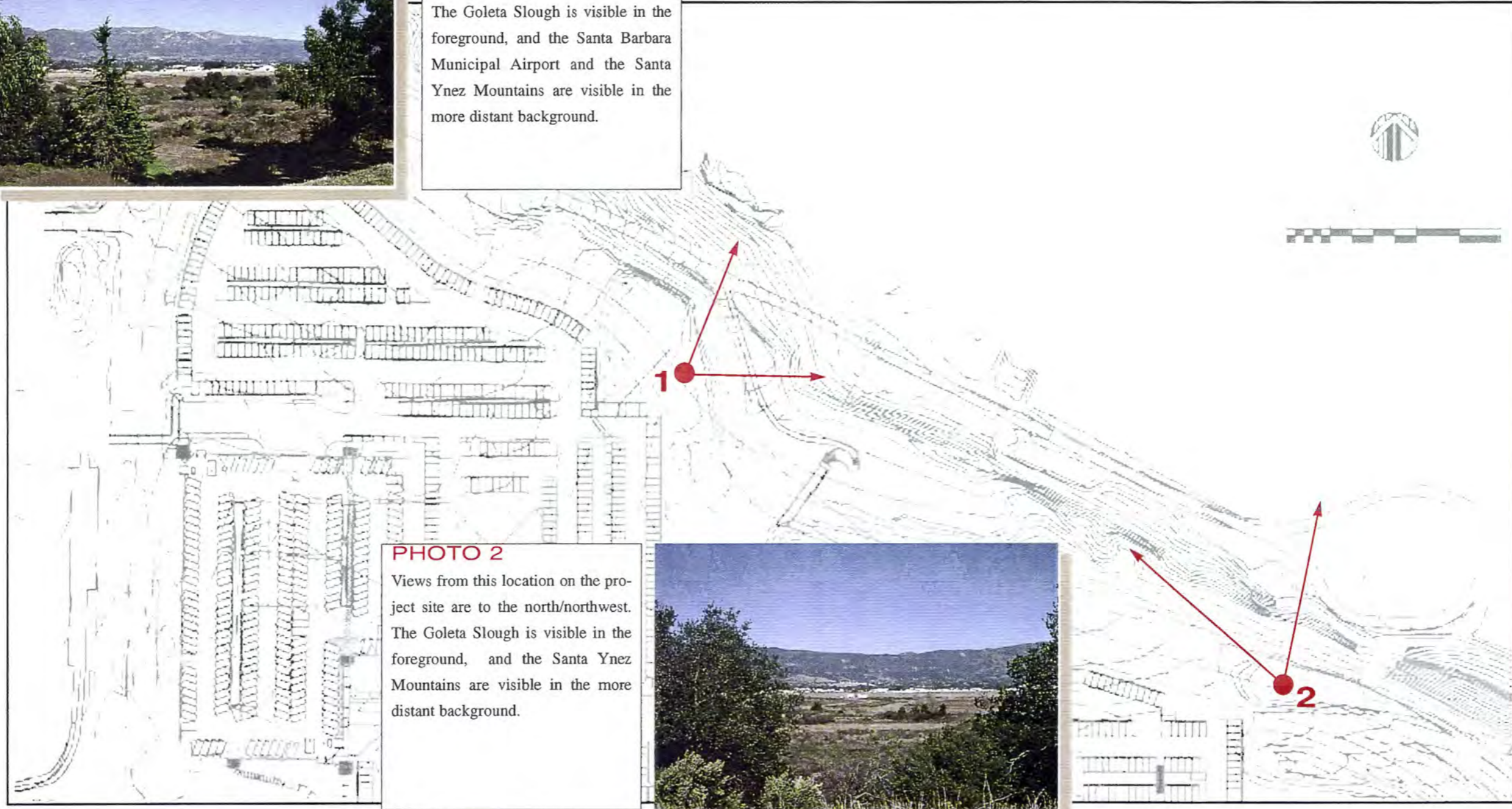


PHOTO 2
Views from this location on the project site are to the north/northwest. The Goleta Slough is visible in the foreground, and the Santa Ynez Mountains are visible in the more distant background.





PHOTO 1
The access road which is located along the northern boundary of the project site collects wind-blown refuse from the adjacent parking lots. This area would be included as part of the 5.45-acre restoration/enhancement program.

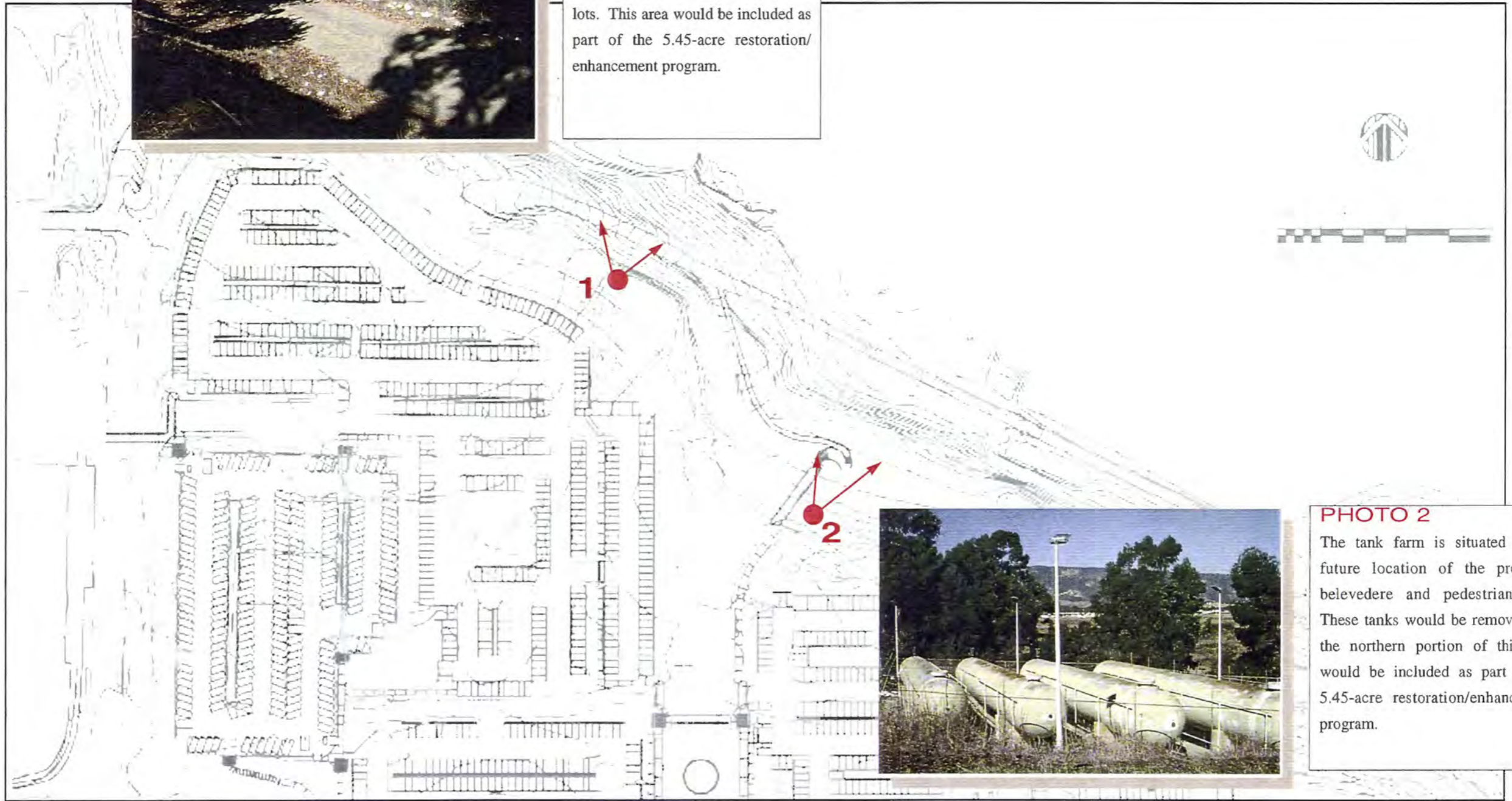


PHOTO 2
The tank farm is situated in the future location of the proposed beveledere and pedestrian trail. These tanks would be removed and the northern portion of this area would be included as part of the 5.45-acre restoration/enhancement program.

PHOTO 1
 At the base of the Goleta Slough Bluffs invasive plants have displaced native plant species. This photo shows non-native grasses. This area would be included as part of the 5.45-acre restoration/enhancement program.

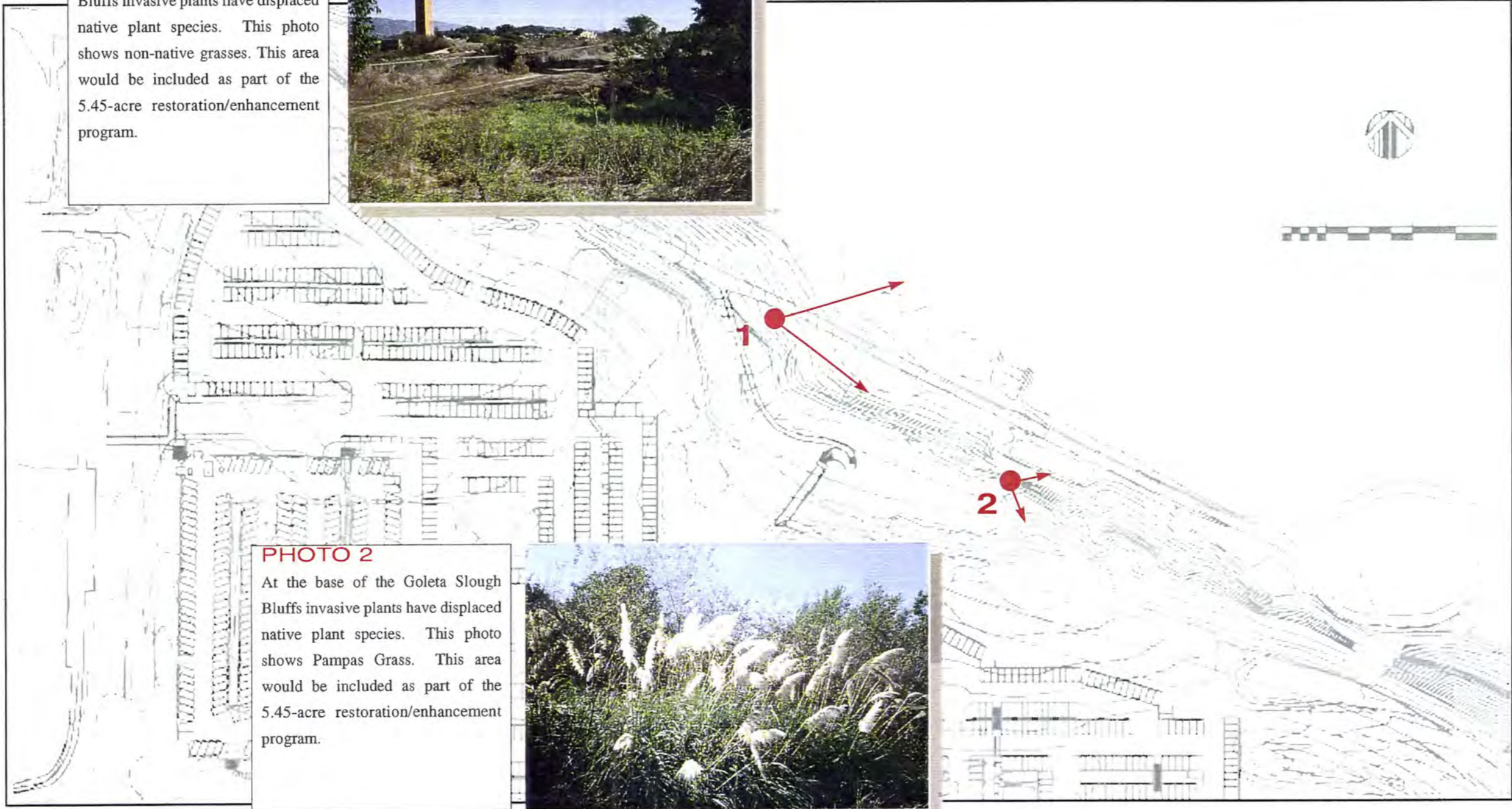


PHOTO 2
 At the base of the Goleta Slough Bluffs invasive plants have displaced native plant species. This photo shows Pampas Grass. This area would be included as part of the 5.45-acre restoration/enhancement program.



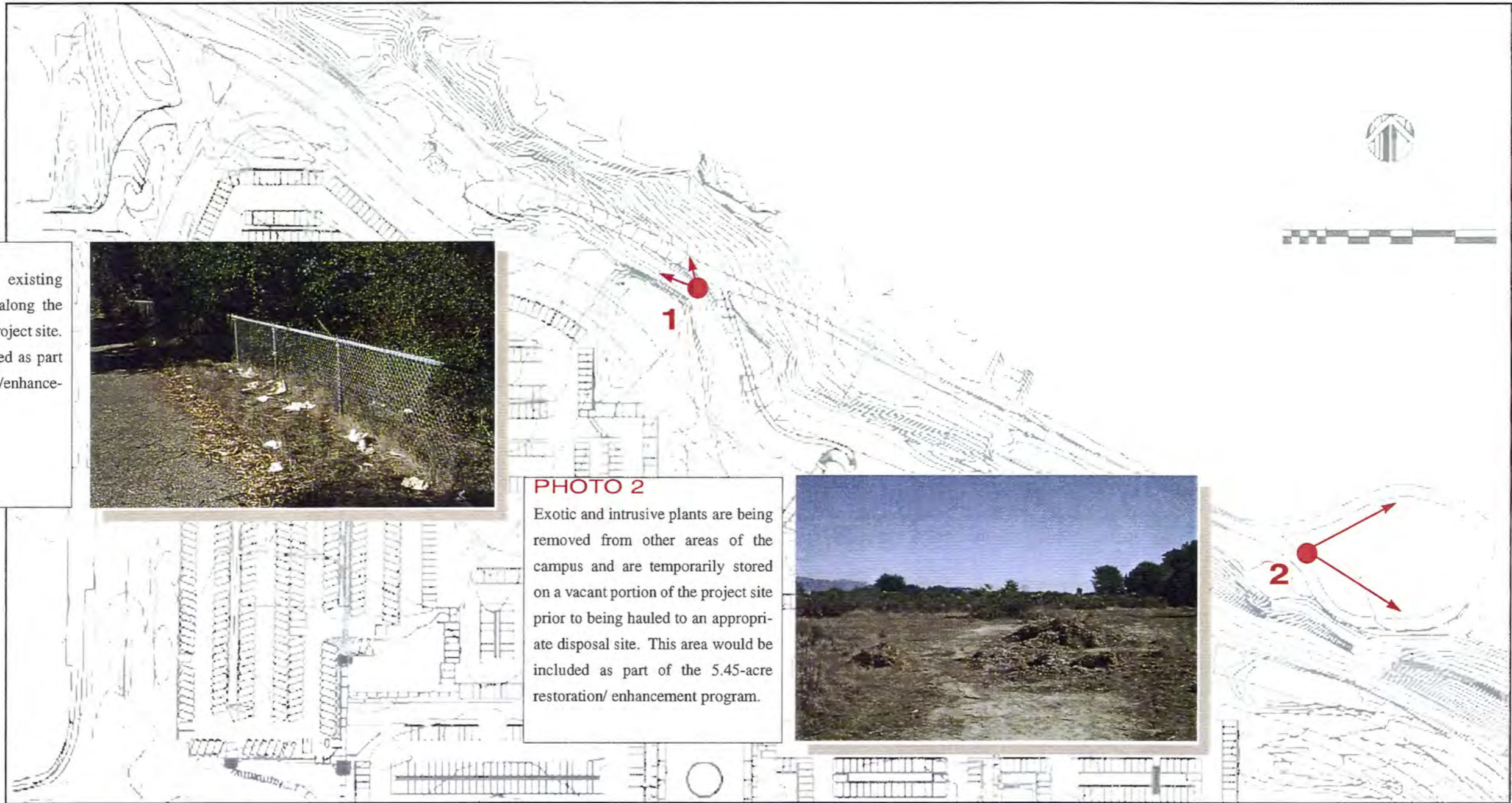


PHOTO 1

Wind-blown trash from existing parking lots accumulates along the northern boundary of the project site. This area would be included as part of the 5.45-acre restoration/enhancement program.



PHOTO 2

Exotic and intrusive plants are being removed from other areas of the campus and are temporarily stored on a vacant portion of the project site prior to being hauled to an appropriate disposal site. This area would be included as part of the 5.45-acre restoration/enhancement program.



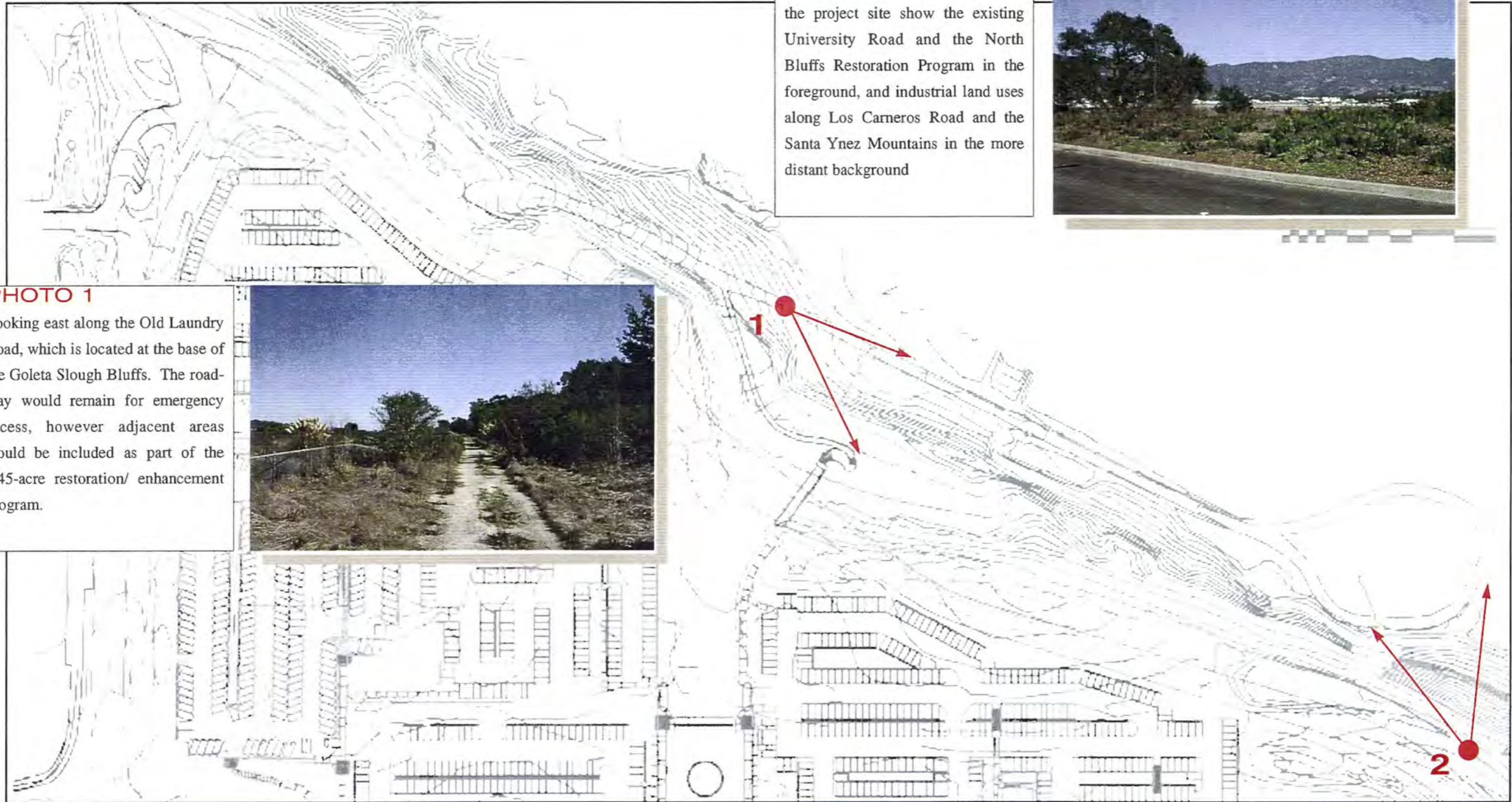


PHOTO 1
 Looking east along the Old Laundry Road, which is located at the base of the Goleta Slough Bluffs. The roadway would remain for emergency access, however adjacent areas would be included as part of the 5.45-acre restoration/ enhancement program.



PHOTO 2
 Views from this location just east of the project site show the existing University Road and the North Bluffs Restoration Program in the foreground, and industrial land uses along Los Carneros Road and the Santa Ynez Mountains in the more distant background



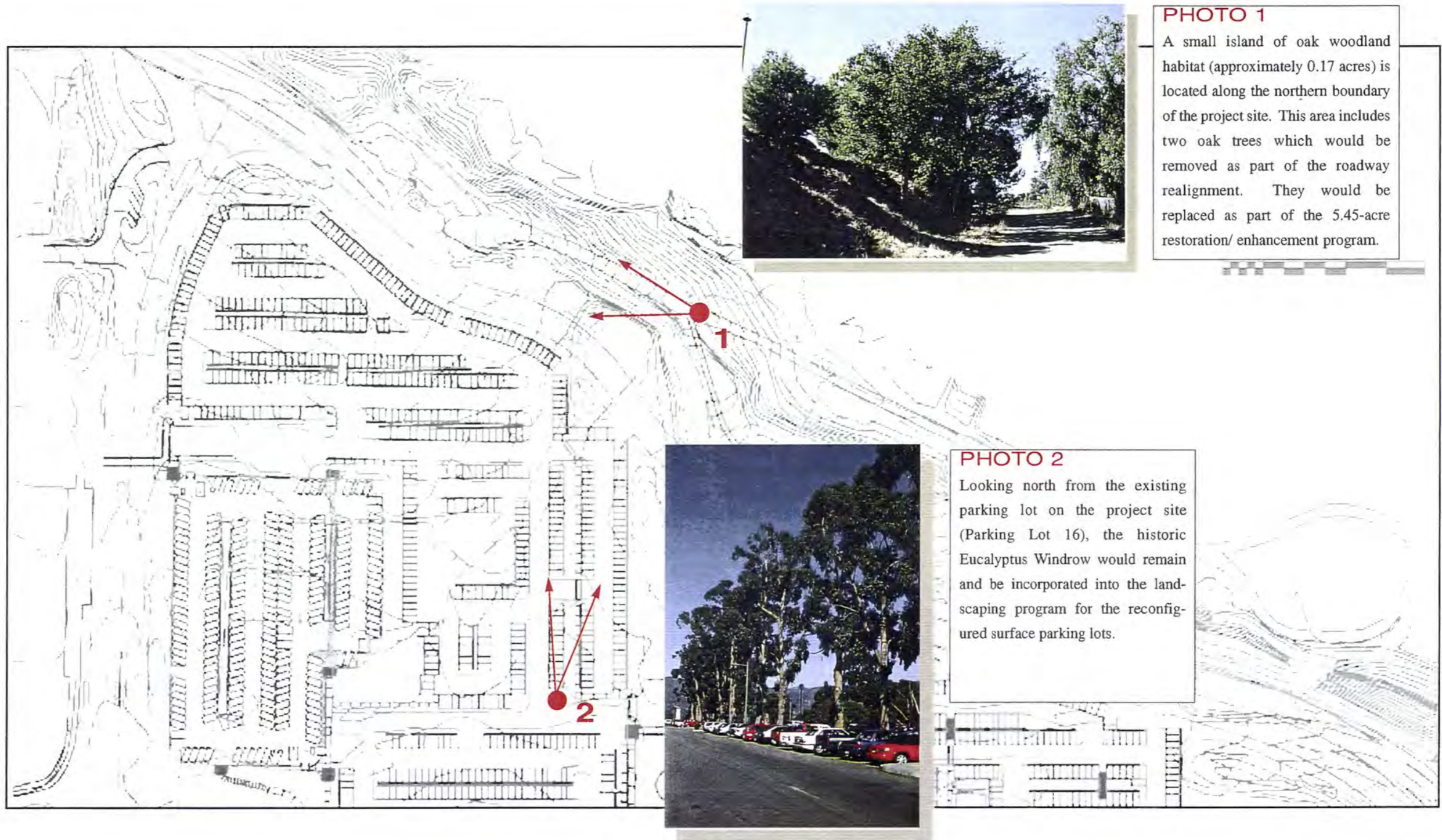


PHOTO 1
A small island of oak woodland habitat (approximately 0.17 acres) is located along the northern boundary of the project site. This area includes two oak trees which would be removed as part of the roadway realignment. They would be replaced as part of the 5.45-acre restoration/ enhancement program.

PHOTO 2
Looking north from the existing parking lot on the project site (Parking Lot 16), the historic Eucalyptus Windrow would remain and be incorporated into the landscaping program for the reconfigured surface parking lots.