## CALIFORNIA COASTAL COMMISSION

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# RECORD PACKET COPY

August 21, 2002

TO:

Commissioners and Interested Persons

FROM:

Charles Damm, Senior Deputy Director

Melanie Hale, Supervisor, Planning and Regulation

Shana Gray, Coastal Program Analyst

RE:

Notice of Impending Development 4-02, Pursuant to the University of California Santa Barbara Certified Long Range Development Plan for Public Hearing and Commission Action at the September 10, 2002

Commission Meeting in Los Angeles.

## SUMMARY AND STAFF RECOMMENDATION

The impending development consists of a two-year extension of the temporary surface improvements to Parking Lot 38 on Storke Campus, through July 2004. As part of the 200-unit San Rafael Housing Project (now called Manzanita Village) approved under Notice of Impending Development (NOID) 1-98, the University proposed the conversion of the existing temporary gravel-surface Parking Lot 38 to a permanent paved parking lot upon completion of the housing project. The Manzanita Housing Project is anticipated for occupancy in September 2002. However, the University is presently contemplating future campus housing projects, parking, and associated LRDP amendment(s) that would require the relocation of Parking Lot 38. The University now proposes to maintain the parking lot with the temporary surface improvements (gravel) and delay the permanent improvements for two years to allow enough time for the future LRDP amendment(s) to be prepared and acted upon by the Commission.

The required items necessary to provide a complete notice of impending development were received in the South Central Coast Office on June 26, 2002, and the notice was deemed filed on July 3, 2002. Because of the time constraints associated with the August 6-9 hearing, University staff authorized postponement of the project to the September 10-13, 2002 hearing in Los Angeles. Staff is recommending that the Commission determine that the impending development is consistent with the certified University of California at Santa Barbara Long Range Development Plan (LRDP) with two special conditions regarding (1) interim parking and (2) drainage and polluted runoff control which are necessary to bring the development into conformance with the LRDP.

SUBSTANTIVE FILE DOCUMENTS: 1990 Long Range Development Plan (UCSB, 1990); Notice of Impending Development 1-98 (San Rafael Housing Project);

#### I. PROCEDURE

Section 30606 of the Coastal Act and Article 14, §13547 through §13550 of the California Code of Regulations govern the Coastal Commission's review of subsequent development where there is a certified LRDP. Section 13549(b) requires the Executive Director or his designee to review the notice of impending development (or development announcement) within ten days of receipt and determine whether it provides sufficient information to determine if the proposed development is consistent with the certified LRDP. The notice is deemed filed when all necessary supporting information has been received.

Within thirty days of filing the notice of impending development, the Executive Director shall report to the Commission the pendency of the development and make a recommendation regarding the consistency of the proposed development with the certified LRDP. After public hearing, by a majority of its members present, the Commission shall determine whether the development is consistent with the certified LRDP and whether conditions are required to bring the development into conformance with the LRDP. No construction shall commence until after the Commission votes to render the proposed development consistent with the certified LRDP.

#### II. STAFF RECOMMENDATION: MOTION AND RESOLUTION

MOTION:

I move that the Commission determine that the development described in the Notice of Impending Development 4-02, as conditioned, is consistent with the certified University of California at Santa Barbara Long Range Development Plan.

#### **STAFF RECOMMENDATION:**

Staff recommends a YES vote. Passage of this motion will result in a determination that the development described in the Notice of Impending Development 4-02, as conditioned, is consistent with the certified University of California at Santa Barbara Long Range Development Plan and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

## RESOLUTION TO DETERMINE DEVELOPMENT IS CONSISTENT WITH LRDP:

The Commission hereby determines that the development described in the Notice of Impending Development 4-02, as conditioned, is consistent with the certified University of California at Santa Barbara Long Range Development Plan for the reasons discussed in the findings herein.

## III. SPECIAL CONDITIONS

## 1. <u>Interim Parking</u>

Prior to commencement of the 2002-2003 enrollment term, the University shall submit evidence, subject to the review and approval of the Executive Director, that the resident student parking program does not require any portion of the 117 parking spaces that will be unavailable as a result of maintaining the temporary surface improvements. Documentation shall include an inventory of resident student parking spaces. description of the resident student parking-lottery, and number and location of resident student passes for the duration of the temporary surface improvements to Parking Lot 38. If the Executive Director determines that the resident student parking program is inadequate without the 117 parking spaces, or portion thereof, the University shall secure 117 (or portion thereof) off-campus parking spaces for the duration of the temporary surface improvements to Parking Lot 38. The Goleta Beach parking area operated by the County of Santa Barbara shall not be used by students or faculty as a means of Campus parking. In conjunction with the County of Santa Barbara, the University shall employ measures, such as penalty fees, signs, and Campus information to prevent students and faculty of the University from using the Goleta Beach parking area for Campus use.

## 2. <u>Drainage and Polluted Runoff Control Program</u>

Prior to the commencement of the 2002-2003 enrollment term, the University shall submit for the review and approval of the Executive Director, final drainage and runoff control plans, including supporting calculations for the temporary surface improvements to Parking Lot 38. The plan shall be prepared by a licensed engineer and shall incorporate structural and non-structural Best Management Practices (BMPs) designed to control the volume, velocity and pollutant load of stormwater leaving the developed site. The plan shall be in substantial conformance with the following remarks:

- (a) Selected BMPs (or suites of BMPs) shall be designed to treat, infiltrate or filter the amount of stormwater runoff produced by all storms up to and including the 85th percentile, 24-hour runoff event for volume-based BMPs, and/or the 85th percentile, 1-hour runoff event, with an appropriate safety factor (i.e., 2 or greater), for flow-based BMPs.
- (b) Runoff shall be conveyed off site in a non-erosive manner.
- (c) Energy dissipating measures shall be installed at the terminus of outflow drains.
- (d) The plan shall include provisions for maintaining the drainage system, including structural BMPs, in a functional condition throughout the life of the approved development. Such maintenance shall include the following: (1) BMPs shall be inspected, cleaned and repaired when necessary prior to the onset of the storm season, no later than September 30<sup>th</sup> each year and (2)

should any of the project's surface or subsurface drainage/filtration structures or other BMPs fail or result in increased erosion, the applicant/landowner or successor-in-interest shall be responsible for any necessary repairs to the drainage/filtration system or BMPs and restoration of the eroded area. Should repairs or restoration become necessary, prior to the commencement of such repair or restoration work, the applicant shall submit a repair and restoration plan to the Executive Director to determine if an amendment or new Notice of Impending Development is required to authorize such work.

(e) The earth drainage swale shall include use of high-uptake native vegetation, such as juncus, elecocharis, and carex.

#### IV. FINDINGS AND DECLARATIONS

The Commission finds and declares as follows:

## A. Long Range Development Plan Background

On March 17, 1981, the University's Long Range Development Plan (LRDP) was effectively certified by the Commission. The LRDP has been subject to ten 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 for the new development of no more than 1.2 million sq. ft. of new structural improvements and 830,000 sq. ft. of site area on Campus for buildings other than parking garages and student housing.

## B. <u>Description of Impending Development</u>

The imperating development consists of a two-year extension of the temporary surface improvements to Parking Lot 38 on Storke Campus, effectively extending the temporary improvements through July 2004 (Exhibit 1). As part of the 200-unit San Rafael Housing Project (now called Manzanita Village) approved under Notice of Impending Development (NOID) 1-98, the University proposed the expansion and conversion of the existing temporary gravel-surface Parking Lot 38 to a permanent paved parking lot upon completion of the housing project. The Manzanita Housing Project is anticipated for occupancy in September 2002. However, the University is presently contemplating future campus housing projects, parking, and associated LRDP amendment(s) that would require the relocation of Parking Lot 38. The University now proposes to maintain the parking lot with the temporary surface improvements (gravel) and delay the permanent improvements for two years to allow enough time for the future LRDP amendment(s) to be prepared and acted upon by the Commission.

Parking Lot 38 is located on the east side of the Storke Campus, west of Harder Stadium (Exhibit 2). Parking Lot 38 is bounded on the south by Storke Fields and is setback approximately 240 feet from the Storke Campus Wetlands which are located to

the north (Exhibit 3). At its closest point, Parking Lot 38 is located approximately 50 feet from the designated wetland buffer.

Parking Lot 38 was developed as a temporary lot in 1997 to address the short-term loss of parking during construction of the Mesa Parking Structure (NOID 1-97). Drainage improvements were constructed in 1997, concurrent with the development of the temporary lot, including the use of fossil filters. In 1998, the University proposed permanent surface improvements to the existing gravel surface of Parking Lot 38 to accommodate the resident students associated, at least in part, with the 200-unit housing project. The permanent improvements to Parking Lot 38 included under NOID 1-98 included concrete curb and gutter, asphalt surfacing, and landscape planters (Exhibit 4).

Pursuant to NOID 1-98, the University proposed the expansion and conversion of the existing temporary 313 space gravel surface parking lot (Lot 38) to a permanent 479 space paved parking lot upon completion of the housing project. The University has recently established the existing parking lot capacity at 362 parking spaces, as determined through University parking surveys. Based on the updated parking count of 362 existing parking spaces, the two-year extension of parking lot improvements would result in a potential interim shortfall of 117 parking spaces. Permanent development of the parking lot would include the expansion of the current parking lot and reconfiguration of parking spaces to accommodate 479 cars. The University has identified a potential future location for Parking Lot 38 (Exhibit 5) which would include the 479 required spaces as well as any additional parking spaces needed for proposed development. The relocation of Parking Lot 38 is contemplated in regard to new development and would require Commission approval through future LRDP amendment(s) and notice(s) of impending development. Should the Commission not take action on such amendments prior to July 2004, the University would complete the permanent improvements as approved in NOID 1-98 or provide a new notice of impending development to extend the timeline.

# C. <u>Previous Commission Action</u>

The development pursuant to NOID 1-98 (San Rafael Housing Project) consists of the construction of a new 188,000 gross sq. ft., 3 and 4-story, 200-unit, 800-bed student housing complex not to exceed 45 ft. in height. The project also included the removal of an existing temporary 546-space gravel parking lot, the construction of 19,000 gross sq. ft. of new support facilities (a Resource and Technology Center and two multipurpose buildings), coastal access trail improvements, 26,050 cu. yds. of grading (8,190 cu. yds. of cut and 17,860 cu. yds. of fill), landscaping, the addition of 6,500 gross sq. ft. of area and renovation of the existing Carrillo Dining Commons buildings, the expansion of Lot 24 from an existing 22-space parking lot to an 81-space parking lot, the conversion of an existing temporary 313 space gravel surface parking lot (Lot 38) to a permanent 479 space paved parking lot, and the construction of approximately one acre of wetland habitat on Lagoon Island.

## D. Parking and Circulation

Section 30250(a) of the Coastal Act, which is included as a policy in the 1990 UCSB Long Range Development Plan (LRDP), states that new development shall not overburden the public infrastructure and be located where it will not have significant individual or cumulative adverse effects on coastal resources. In addition, consistent with Section 30210 of the Coastal Act, the LRDP provides for maximum public coastal access on campus. Public pedestrian access is available to and along the entire 2½ miles of coastline contiguous to the campus. The parking facilities on campus constitute the majority of publicly-available beach parking in the Goleta area. Most of the approximately 6,187 parking spaces on campus may be used by the general public for a nominal charge. In addition, there is no charge for parking on campus during evenings, weekends, or holidays. Campus parking facilities provide overflow parking for the County of Santa Barbara operated Goleta Beach Park located adjacent to the campus. Several parking lots on campus have been specifically identified in the LRDP to accommodate public parking demand during Goleta Beach peak use periods.

The impending development consists of a two-year extension of the temporary surface improvements to Parking Lot 38 on Storke Campus through July 2004. As part of the 200-unit San Rafael Housing Project (now called Manzanita Village) approved under Notice of Impending Development (NOID) 1-98, the University proposed the expansion and conversion of the existing temporary gravel-surface Parking Lot 38 to a permanent paved parking lot upon completion of the housing project. The University intends to maintain the parking lot with the temporary surface improvements (gravel) and delay the permanent improvements for two years to allow enough time for the future LRDP amendment(s) to be prepared and acted upon by the Commission.

To address infrastructure and access issues with regard to the Manzanita Village (San Rafael) Housing Project, NOID 1-98 included the removable arrevisting temporary 546-space gravel parking lot, the construction of coastal access trail improvements, the expansion of Lot 24 from an existing 22-space parking lot on 87-space parking lot, and the conversion of an existing temporary 313 space gravel surface parking lot (Lot 38) to a permanent 479 space paved parking lot. The University was required as a condition of NOID 3-94 to remove the 546-space temporary parking lot by December 1998. Therefore, the proposed project did not result in the loss of any existing approved parking spaces on campus. The conversion of the previously approved temporary lot (Lot 38) located west of Harder Stadium to a larger permanent parking lot and the expansion of Lot 24 located on the project site would result in the addition of 560 new permanent parking spaces on campus.

The Initial Study/Negative Declaration for NOID 1-98 dated September 1998 indicated that a maximum of 400 of the 800 students that would reside in the proposed housing development would be issued permits for parking. To provide dormitory students residing in the proposed housing project with easier access to Lot 38 (located off-site), the University has expanded the existing bicycle trail network. The Commission notes that bicycle access to distant parking areas is consistent with the other parking areas

currently provided for other dormitory residents on campus. In addition, to facilitate the transportation of students to Lot 38, the University also proposes to provide electric shuttle service from the proposed student housing facility to Lot 38.

Pursuant to NOID 1-98, the University proposed the expansion and conversion of the existing temporary 313 space gravel surface parking lot (Lot 38) to a permanent 479 space paved parking lot upon completion of the housing project. The University has more recently established the existing parking lot capacity at 362 parking spaces, as determined through University parking surveys. Based on the updated parking space count of 362 existing parking spaces, the two-year extension of parking lot improvements would result in a potential temporary shortfall of 117 parking spaces.

Though Parking Lot 38 is not designated in the LRDP policies to meet specific development requirements, the LRDP recognizes the need to create additional parking on Campus to accommodate expansion and growth. Parking Lot 38 was identified under the Manzanita Village Project NOID 1-98 to provide 479 parking spaces dedicated for the sole use resident students. Under the original proposed project, the Commission concluded that the proposed project would not result in any cumulative adverse effects to parking on campus. However, the extension of temporary surface improvements would result in a potential interim shortfall of 117 parking spaces for resident students. This impact to the resident parking has the potential to impact visitor parking by resulting in visitor parking areas being utilized by students.

University staff asserts that a total of 790 parking spaces would be made available for resident students on campus. There are four resident student parking lots on campus, including Parking Lot 38. Parking Services allocates parking permits by lottery each year. Applications for parking spaces include a preferred Parking Lot location. In past years, there have been fewer requests for spaces in Parking Lot 38 since it is the most remote location in relation to the student housing areas. Parking Lot 38 will also be the most remote parking location in relation to Manzanita Village housing, and therefore University staff believes that the other three lots would be completely filled prior to use of Lot 38.

University staff maintains that the additional 117 parking spaces that would have been available as a result of the expansion and permanent improvements to temporary Lot 38 are not necessary for the resident student housing program, and that the required 790 parking spaces, including the 362 spaces in Lot 38, are currently available on campus. However, documentation is not readily available to confirm the adequacy of resident student parking without the 117 parking spaces. Therefore, to ensure that there is not an interim parking shortfall which will overburden the existing parking infrastructure or adversely impact visitor parking, **Special Condition One (1)** sets forth a requirement that the University submit evidence, subject to the review and approval of the Executive Director, that confirms that the resident student parking program does not require any portion of the 117 parking spaces that will be unavailable as a result of maintaining the *temporary* surface improvements. Documentation shall include an inventory of resident student parking spaces, description of the resident student

parking-lottery, and number and location of resident student passes for the duration of the temporary surface improvements to Parking Lot 38. Furthermore, Special Condition 1 specifies that if the Executive Director determines that the resident student parking program is inadequate without the 117 parking spaces, or portion thereof, the University shall secure 117 (or portion thereof) off-campus parking spaces for the duration of the temporary surface improvements to Parking Lot 38.

In previous parking shortfall situations, the University has considered the potential to make up deficit parking spaces by securing a lease agreement with the County of Santa Barbara to lease parking spaces at Goleta Beach. The use of public access beach parking would be inconsistent with Section 30210 of the Coastal Act. Therefore, Special Condition One (1) also requires the University to continue to work with the County of Santa Barbara to employ measures such as penalty fees, signs, and campus information to prevent students and faculty of the University from using the Goleta Beach parking area for Campus use.

The Commission, therefore, finds that the notice of impending development, as conditioned, is consistent with the applicable LRDP policies with regard to parking, circulation, and access.

# E. <u>Environmentally Sensitive Habitat, Marine Resources, and Water</u> <u>Quality</u>

Coastal Act Section 30230, which has been included in the certified LRDP, states that marine resources shall be maintained, enhanced and where feasible restored and that special protection shall be given to areas and species of special biological significance. Section 30231 of the Coastal Act, which has also been included in the certified LRDP, states, in part, that the quality of coastal waters, streams, and wetlands shall be maintained and where feasible restored. Section 30233 of the Coastal Act, included in the certified LRDP, states, in part, that the diking, filling, and reducing of wetland areas shall not be allowed with the exception of development for incidental public services, restoration purposes, and nature study or aquaculture. Further, Section 30240 of the Coastal Act, which has been included in the certified LRDP, states that environmentally sensitive habitat areas (ESHAs) shall be protected and that only uses dependent upon such resources shall be allowed in such areas. Section 30240 also requires that development in areas adjacent to ESHA shall be sited and designed to prevent impacts which would significantly degrade such areas.

In addition, the LRDP contains several policies which require the protection of ESHA and wetland areas. For instance, Policy 30231.1 requires that identified Campus wetlands and coastal waters be protected from increased sedimentation or contamination from new development. Policy 30231.2 requires that new development be designed to minimize soil erosion and to direct runoff away from coastal waters and wetlands. Subpart (*l*) of Policy 30231.2 of the LRDP also requires that development adjacent to the 100 ft. buffer surrounding campus wetlands shall not result in adverse

effects to campus wetlands. Further, Policy 30231.3 of the LRDP requires that the area surrounding campus wetlands shall be reserved as open-space buffer.

The impending development consists of a two-year extension of the temporary surface improvements to Parking Lot 38 on Storke Campus, through July 2004. As part of the 200-unit San Rafael Housing Project (now called Manzanita Village) approved under NOID 1-98, the University proposed the conversion of the existing temporary gravel-surface Parking Lot 38 to a permanent paved parking lot upon completion of the housing project. The University intends to maintain the parking lot with the temporary surface improvements (gravel) and delay the permanent improvements for two years.

The 26-acre Storke Campus Wetland is an environmentally sensitive habitat area which runs east-west through Storke Campus and is bisected by Los Carneros Road (Exhibit 2). The Storke Campus Wetland provides feeding and nesting areas for birds and animals of nearby Goleta Slough. The Storke Wetland area is characterized by both fresh and salt water wetlands and valley grassland. Parking Lot 38 is located on the east side of the Storke Campus, west of Harder Stadium. Parking Lot 38 is bounded on the south by Storke Recreational Fields and is setback approximately 240 feet from the Storke Campus Wetlands which are located to the north (Exhibit 3). At its closest point, Parking Lot 38 is located approximately 50 feet from the designated wetland buffer.

Parking Lot 38 was developed in 1997 to address short-term loss of parking during construction of the Mesa Parking Structure (NOID 1-97). Special Condition Three of NOID 1-97 required the University to use high-uptake native vegetation, such as juncus, elecocharis and carex, within the earth drainage swale at Parking Lot 38. The University asserts that drainage improvements were constructed concurrent with the 1997 temporary parking lot, including use of fossil filters. The University proposed permanent surface improvements to existing gravel surface of Parking Lot 38 to accommodate resident-students associated, at least in part, with the 200-unit housing project. The improvements approved under NOID 1-98 include concrete curb and gutter, asphalt surfacing, and landscape planters (Exhibit 4).

Commission staff notes that Section 30240, incorporated by reference into the LRDP, requires that development in areas adjacent to ESHA shall be sited and designed to prevent impacts which would significantly degrade such areas. In this case, the University intends to extend the time of use of the temporary parking lot, which is located in an area nearby, and ultimately drains to, the Storke Wetlands. In addition, the parking lot will receive intensified use as a result of the development of the housing project and the increase in resident students permitted to use the site.

Use of the site for parking has the potential to introduce pollutants or increase erosion from the site which could result in adverse effects to water quality or contribute to sedimentation of the habitat, thereby decreasing wetland-related function and value of the Storke Campus Wetland. Such cumulative impacts can be minimized through the implementation of drainage and polluted runoff control measures. In addition to ensuring that runoff is conveyed from the site in a non-erosive manner, drainage and

water pollution control measures should also include opportunities for runoff to infiltrate into the ground. Methods such as vegetated filter strips, gravel filters, and other media filter devices allow for infiltration. Because much of the runoff from the site is returned to the soil, overall runoff volume is reduced. Slow surface flow of runoff allows sediment and other pollutants to settle into the soil where they can be filtered. The reduced volume of runoff takes longer to reach streams and its pollutant load is greatly reduced.

Because the temporary nature of the parking lot is proposed to be extended, the functioning life of the drainage and erosion control measures also need to be reviewed for adequacy in order to minimize adverse effects to coastal waters resulting from either contamination or increased sedimentation, and consistent with LRDP policies 30231.2 and 30231.3. Therefore the Commission finds it necessary to require the University, as required by Special Condition Two (2), to submit a Drainage and Polluted Runoff Control Plan for the temporary Parking Lot 38 which evidences that current, or proposed, drainage and runoff control measures are sufficient to control the volume, velocity and pollutant load of stormwater leaving the site. Critical to the successful function of post-construction structural BMPs in removing pollutants in stormwater to the Maximum Extent Practicable, is the application of appropriate design standards for sizing BMPs. The majority of runoff is generated from small storms because most storms are small. Additionally, storm water runoff typically conveys a disproportionate amount of pollutants in the initial period that runoff is generated during a storm event. Designing BMPs for the small, more frequent storms, rather than for the large infrequent storms, results in improved BMP performance at lower cost.

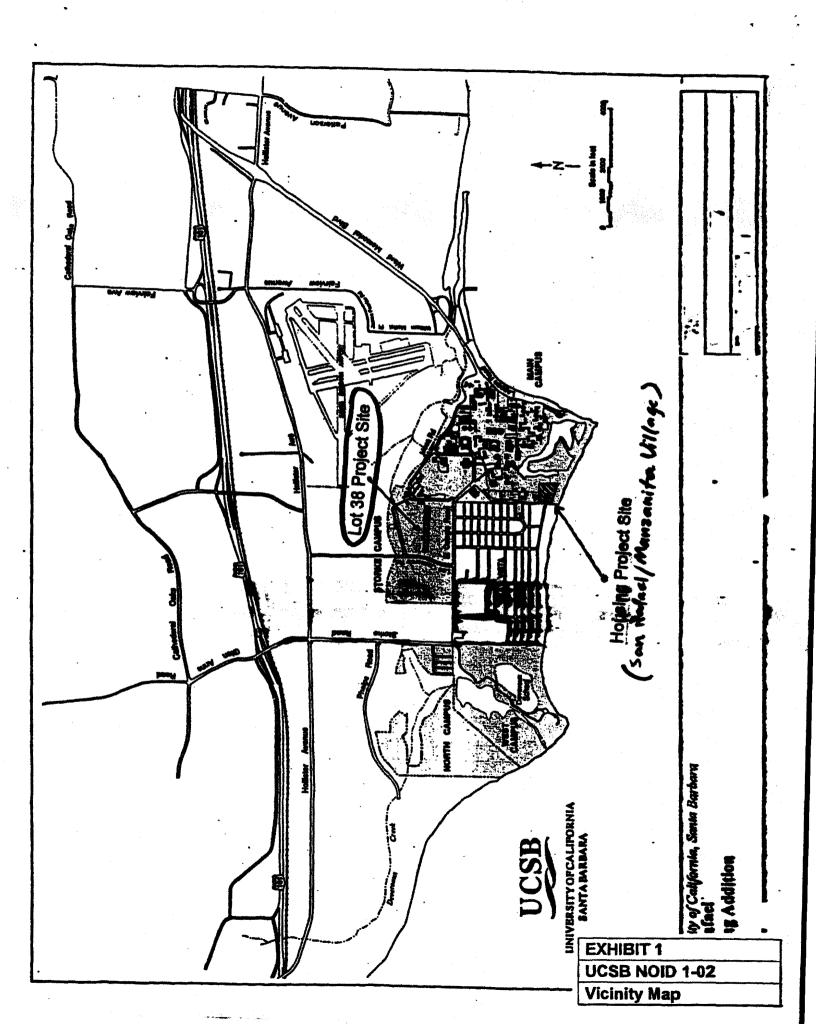
Special Condition 2 requires the University to implement and maintain a drainage plan designed to ensure that drainage is conveyed in a non-erosive manner. This drainage plan is required in order to ensure that risks from geologic hazard are minimized and that erosion, sedimentation, and polluted runoff are minimized to reduce potential impacts to coastal streams, and drainages and considerable sensitive habitat areas. Such a plan will allow that einfiltration and filtering of runoff from the developed areas of the site, most importantly capturing the initial first flush flows that occur as a result of the first storms of the season. This flow carries with it the highest concentration of pollutants that have been deposited on impervious surfaces during the dry season. Additionally, the University must monitor and maintain the drainage and polluted runoff control system to ensure that it continues to function as intended throughout the life of the development.

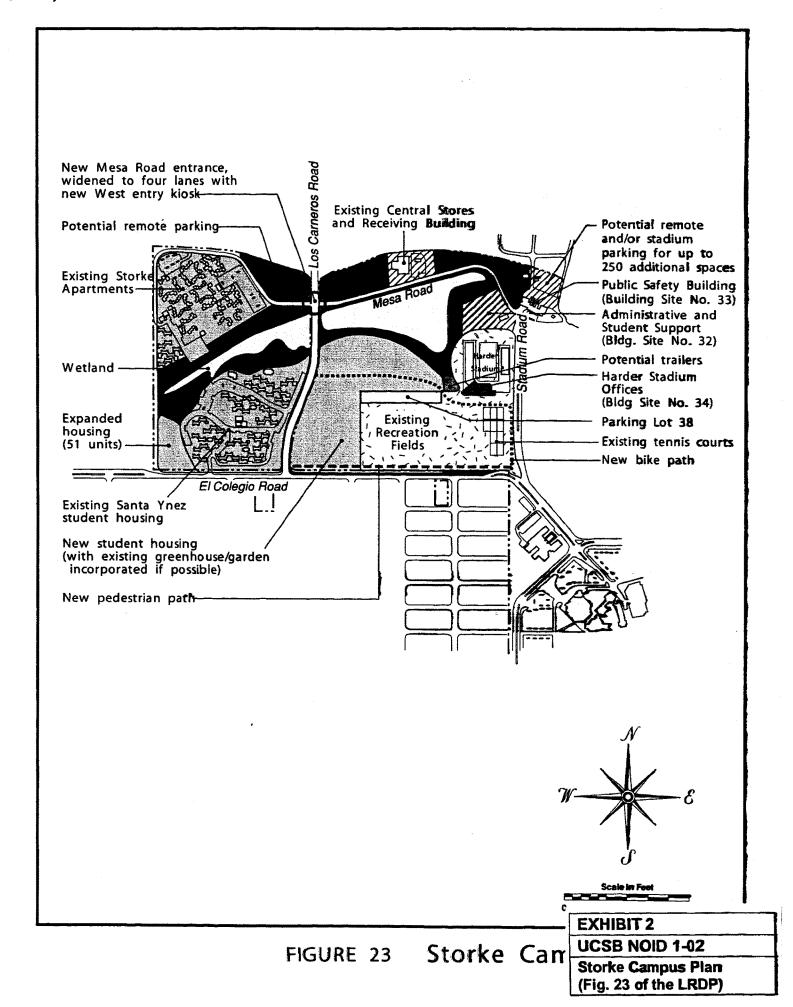
Sizing post-construction structural BMPs to accommodate (infiltrate, filter or treat) the runoff from the 85<sup>th</sup> percentile storm runoff event, in this case, is equivalent to sizing BMPs based on the point of diminishing returns (i.e. the BMP capacity beyond which, insignificant increases in pollutants removal (and hence water quality protection) will occur, relative to the additional costs. Therefore, the Commission requires the selected post-construction structural BMPs be sized based on design criteria specified in Special Condition 2, and finds that this will ensure the proposed impending development will be designed to minimize adverse impacts to coastal resources, in a manner consistent with

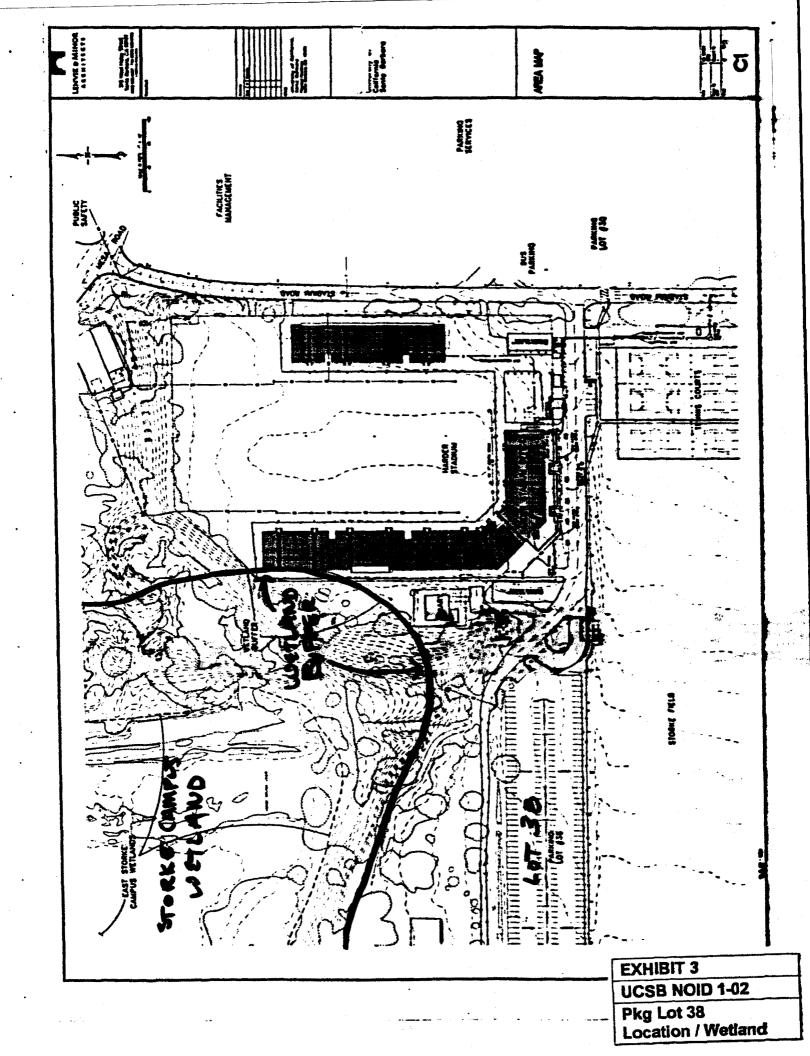
the water quality, environmentally sensitive habitat, and marine resource protection policies of the LRDP.

Furthermore, to ensure that proposed drainage and stormwater quality improvements are properly implemented, in order to ensure that adverse effects to coastal water quality do not result from the proposed project, Special Condition Two (2) requires the University to monitor and maintain the drainage and polluted runoff control system to ensure that it continues to function as intended throughout the life of the development. Erosion can be minimized through continued maintenance of the drainage and erosion control practices implemented in 1997, pursuant to NOID 1-97, including the use of high-uptake native vegetation. The drainage swale appears to consist primarily of grasses and ruderal vegetation. Due to the proximity of the site to the wetland, and to ensure that all areas impacted by the impending development are landscaped in accordance with the LRDP provision to minimize erosion, the Commission finds it necessary to require Special Condition 2 to include the use of high-uptake native vegetation in the drainage swale located between the parking lot and the wetlands.

The Commission, therefore, finds that the notice of impending development, as conditioned, is consistent with the applicable LRDP policies with regards to environmentally sensitive habitat areas, water quality, and the marine environment.







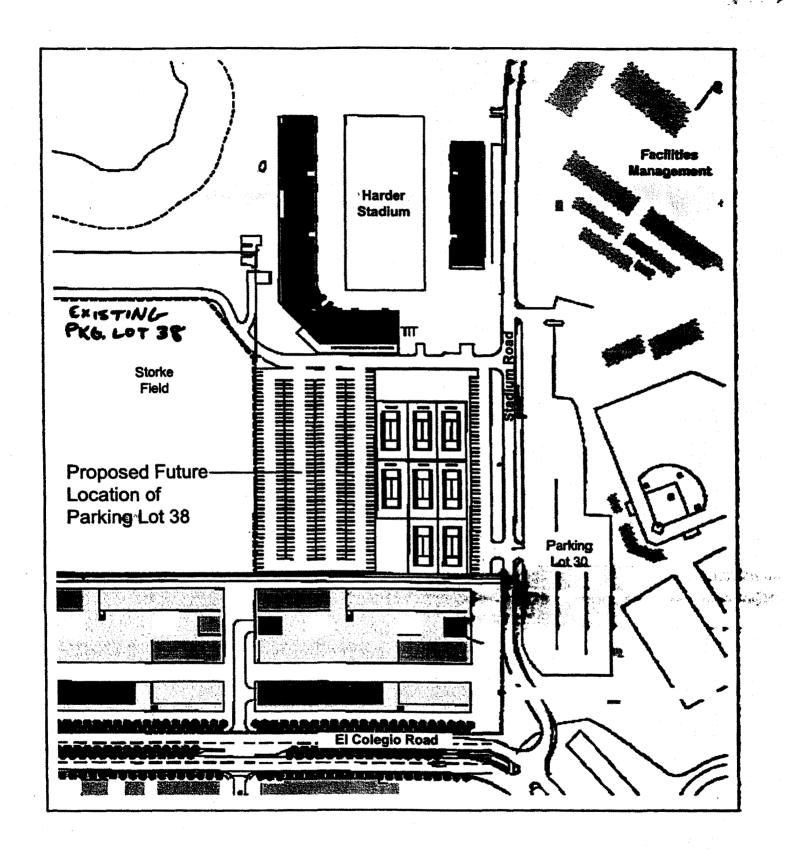


Figure 2: Proposed Future Location of Parking Lot 38

EXHIBIT 5
UCSB NOID 1-02
Proposed Future
Location Pkg Lot 38