CALIFORNIA COASTAL COMMISSION
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W25a

Date: June 25, 2015

To: Commissioners and Interested Persons

From: Steve Hudson, Deputy Director
Barbara Carey, Supervising Analyst
Megan Hudson, Coastal Program Analyst

Subject: **Notice of Impending Development (NOID) CSB-NOID-0002-15 at Santa Barbara City College** for the replacement of dual 15-in. diameter, 122-ft. long storm drain pipes with a 24-in. diameter high performance polyethylene pipe within the East Campus bluff area along Shoreline Drive between La Playa Stadium and Pershing Park to remedy bluff erosion and sediment runoff onto the road during rain events, for Public Hearing and Commission Action at the July 8, 2015 Commission Meeting in Ventura.

SUMMARY OF STAFF RECOMMENDATION

Staff is recommending that the Commission, after public hearing, **approve** Notice of Impending Development No. CSB-NOID-0002-15, as submitted.

Santa Barbara City College has submitted a Notice of Impending Development for the replacement of dual 15-inch diameter, 122-feet long storm drain pipes with a new 24-inch diameter high performance polyethylene drain pipe within the East Campus bluff area along Shoreline Drive between La Playa Stadium and Pershing Park (Exhibits 1-4). The existing drainage pipes convey stormwater runoff from approximately eight acres of the College's East Campus to the City of Santa Barbara's storm drain system. The existing drainage system within the bluff area has failed and stormwater is not conveyed through the storm drain as originally designed. Significant soil erosion has occurred on the sides and base of the pipes on the East Campus bluff slope where the drainage pipes connect to the City's 15-inch diameter storm drain on Cabrillo Avenue (Exhibit 5). The proposed replacement is necessary to remedy bluff erosion and prevent stormwater flows and sediment runoff onto Shoreline Drive during rain events.

The proposed storm drain replacement project will impact one California coast live oak (*Quercus agrifolia*) tree. The oak tree is located at the top of the steep east-facing East Campus slope, along the walking path adjacent to the College's environmental horticulture department structure (Exhibit 6). The proposed repair work is under the tree canopy directly adjacent to the oak tree trunk. The oak tree has grown directly on top of the upper section of the failed drain pipes that are buried approximately 24 inches below grade, and the root system is further constrained by the existing sidewalk within the tree's canopy. The College assessed the feasibility of transplanting the oak tree; however, the minimal chance of the tree surviving transplanting led two consulting arborists to recommend removal of the tree and mitigation with a replanting plan.

The root system is located within the corridor that must be excavated to remove the existing drainage pipes, such that if the tree were transplanted, seventy percent or more of its root mass would be lost.

The drainage pipe runs through an East Campus bluff and a portion of the designated East Campus Coastal Sage Scrub Environmentally Sensitive Habitat Area. The College is proposing to stabilize the eroded bluff and restore all habitat disturbed during the replacement of the drainage pipes. The College has submitted a Habitat Restoration Plan (HRP) that addresses both the California coast live oak mitigation and the coastal sage scrub mitigation. The HRP provides implementation guidelines for the site preparation, planting and seeding, maintenance and monitoring of the coastal sage scrub habitat restoration.

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I. PROCEDURAL REQUIREMENTS

STANDARD OF REVIEW—NOTICE OF IMPENDING DEVELOPMENT

Sections 30605 and 30606 of the Coastal Act and Article 14, Section 13359 of the California Code of Regulations govern the Coastal Commission's review of subsequent development where there is a certified PWP. Section 13354 requires the Executive Director or his designee to review the notice of impending development within five working days of receipt and determine whether it provides sufficient information to determine if the proposed development is consistent with the certified PWP. The notice is deemed filed when all necessary supporting information has been received. The subject notice was filed on June 17, 2015.

Pursuant to Section 13359, within thirty working 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 PWP. After public hearing, by a majority of its members present, the Commission shall determine whether the development is consistent with the certified PWP and whether conditions are required to bring the development into conformance with the PWP. No construction shall commence until after the Commission votes to determine that the proposed development is consistent with the certified PWP.

II. STAFF RECOMMENDATION: MOTION & RESOLUTION

NOID NO. CSB-NOID-0002-15: APPROVAL AS SUBMITTED

MOTION:

> *I move that the Commission determine that the development described in the Notice of Impending Development CSB-NOID-0002-15 (East Campus Storm Drain Replacement), as submitted, is consistent with the certified Santa Barbara City College Public Works Plan.*

Staff recommends a **YES** vote. Passage of this motion will result in a determination that the development described in the Notice of Impending Development No. CSB-NOID-0002-15 (East Campus Storm Drain Replacement), as submitted, is consistent with the certified Santa Barbara City College Public Works Plan and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION:

> *The Commission hereby determines that the development described in the Notice of Impending Development No. CSB-NOID-0002-15, as submitted, is consistent with the certified Santa Barbara City College Public Works Plan for the reasons discussed in the findings herein.*

III. FINDINGS FOR THE APPROVAL OF THE NOTICE OF IMPENDING DEVELOPMENT (NO. CSB-NOID-0002-15), AS SUBMITTED

The following findings support the Commission's approval of the Notice of Impending Development No. CSB-NOID-0002-15, as submitted. The Commission hereby finds and declares as follows:

A. NOTICE OF IMPENDING DEVELOPMENT (CSB-NOID-0002-15) DESCRIPTION AND BACKGROUND

Santa Barbara City College is located at 721 Cliff Drive in Santa Barbara, California. The College campus is divided by Loma Alta Drive into East Campus and West Campus. The proposed drainage pipe replacement project will be located within East Campus, along the coastal bluffs abutting Shoreline Drive between La Playa Stadium and Pershing Park (Exhibit 1-3). La Playa Stadium is located to the south of the project site on the northeast corner of Loma Alta Drive and Shoreline Drive. Pershing Park is located to the north of the project site near the intersection of Castillo Street and Shoreline Drive. The Santa Barbara Harbor and associated parking lot are east of the project site.

The proposed project site consists of a steep, east-facing slope dominated by coastal sage scrub and non-native grassland. The Santa Barbara City College Public Works Plan designates the East Campus Coastal Sage Scrub Habitat as an Environmentally Sensitive Habitat Area.

The replacement of the 122 feet of drainage pipelines will begin with the removal of the existing pipelines and concrete pipe slope stabilizers using a backhoe. Removal of the existing pipeline will begin at the northern terminus where the existing pipeline connects to an existing storm drain beneath the asphalt paved East Campus parking area access road. The paved roadway and adjacent concrete sidewalk to the south will be removed to the southern edge of the existing sidewalk along the East Campus access road. The existing dual pipelines will then be exposed throughout their entire length to their southerly terminus at the existing storm drain at the Shoreline Drive edge of the pavement. Approximately 1,800 cubic yards of soil will be excavated and stockpiled adjacent to the exposed pipeline.

The dismantled pipeline and debris will be removed off-site to a facility that accepts construction and demolition debris and is located outside of the Coastal Zone.

Grading for the replacement 24-inch pipeline will extend in a stepped fashion up to three feet below the pipeline (Exhibit 4). The 1,800 cubic yards of soil will be replaced in 12-inch lifts. Geogrid stabilization fabric will be placed at the base of each 12-inch layer and the soils will be compacted to 90 percent. A six-inch layer of sand will be placed under the pipeline and compacted. The top eighteen inches of soil under paved surfaces, including the sidewalk and the

access road, will be compacted to 95 percent. Concrete pavement four inches thick will then be poured on top of the compacted soils.

Further, the replacement pipeline will terminate at a new "Bubble Up" structure (two feet square) placed immediately north of the City of Santa Barbara's Shoreline Drive right-of-way and connected with the City's existing 15-inch storm drain conduit running beneath Shoreline Drive. The "Bubble Up" structure includes a top grate that will allow for maintenance to the replacement 24-inch drainage pipe and provide for release of any storm flows that exceed the 100-year storm maximum design capacity.

The replacement project will result in the loss of one mature coast live oak tree located in the construction area (Exhibit 6). In order to avoid the removal of the oak tree located at the northerly terminus of the existing pipeline, the College performed an alternatives analysis to consider design solutions that would preserve the tree. Directional drilling was considered as an alternative to the proposed project; however, the size of the lower drilling pit would require encroachment into the public right of way on Shoreline Drive, which would result in potential impacts to traffic, public safety, and public access along this roadway. Additionally, the receiving pit on the top of the bluff would create a greater footprint of disturbance within the Coastal Sage Scrub Environmentally Sensitive Habitat Area. The College also considered the alternative of abandoning the existing damaged drain pipe and rerouting the new drainage pipes around the coast live oak tree. However, because of the close proximity of the tree to the existing connection juncture at Shoreline Drive, the construction would likely cause significant root damage. Also, soil erosion from the existing damaged pipelines has created a large pit (three to four feet in depth) directly adjacent to the tree on the south side. The location of the pit causes significant instability for the mature tree, and there is the potential for the tree to topple in the event of a strong wind storm. Therefore, all considered design alternatives to the proposed project are infeasible and removal of the coast live oak tree cannot be avoided.

The coast live oak tree has grown directly on top of the upper section of the failed drain pipes and an existing sidewalk extends beneath the tree's canopy. The required excavation for the proposed project and the transplanting of the tree would result in significant damage to the tree's root structure, such that the tree would lose approximately 70 percent or more of its root mass. Thus, the potential for successfully transplanting the tree is extremely low.

Subsequent to construction, the College is proposing to mitigate for the loss of one coast live oak by replacing the removed tree with ten planted coast live oak seedlings (mitigation ratio of 10:1) and monitoring the plantings for ten years. Additionally, the College is proposing to mitigate for the impacts to 0.04 acres of Coastal Sage Scrub Habitat by replacing the disturbed habitat with coastal sage scrub plantings (mitigation ratio of 3:1 for a total of 0.12 acres of East Campus Coastal Sage Scrub Habitat restoration) and monitoring the plantings for five years. The proposed Coastal Sage Scrub Habitat restoration will restore all areas of the project site impacted by construction, fill gaps in the coastal sage scrub habitat to achieve a more continuous habitat coverage, replace non-native species with native species, and stabilize the eroded East Campus bluff.

In addition to the planting of native species on the bluff slope, the College is proposing to implement temporary erosion control measures during construction to ensure that the replacement of the pipelines do not further erode the slope. To further reinforce the slope, the College proposes the installation of a Tensar BX1200 geogrid with 12-inch vertical spacing at both the top of the slope and the toe of the slope.

B. CONSISTENCY ANALYSIS

The standard of review for the submitted Notice of Impending Development (NOID) is the policies of the Santa Barbara City College's certified Public Works Plan.

1. Public Access and Recreation

Santa Barbara City College's Public Works Plan (PWP) contains a specific policy intended to facilitate public access to the beach. Policy "Vis 1" states, in relevant part, "Continued public access to and use of the Campus for the purpose of passive recreational uses associated with shoreline access will be encouraged. To assist the public in gaining access through the Campus for passive recreational purposes such as walking, jogging and viewing the ocean, the College will maintain the existing access trail network consisting of Vista Points and signs."

The proposed East Campus Storm Drain Replacement project will have no significant impacts on coastal access or passive recreational uses. The construction footprint for the proposed drainage pipes replacement will take place entirely within the existing drainage corridor. The existing drainage system footprint is within the East Campus Coastal Sage Scrub Environmentally Sensitive Habitat Area and outside of all campus public access corridors.

Construction staging and equipment lay down will take place within a fenced off area that includes a small portion of the East Campus access road, sidewalk and bluff area. A temporary encroachment onto Shoreline Drive will be necessary for approximately 31 days; however, there will be no impacts to public parking.

The entire demolition and replacement of the drainage pipelines will occur over an approximate 1.5-month period. Demolition and removal of the existing pipelines will occur over five working days and the replacement of the drainage pipelines with a new pipeline will occur over approximately twenty working days. Construction will take place Monday through Friday from 7:00 a.m. to 4:00 p.m. and there will be no construction activity on weekends or federal holidays. The College anticipates one heavy equipment trip per day and one light equipment trip per day, and as such, there will be no significant impacts to traffic in the vicinity of the project site.

The submitted NOID CSB-NOID-0002-15 will have no significant impact on the public's access to the College's campus for recreational uses or the public's access to the shoreline. Thus, the NOID, as submitted, is consistent with the College's certified PWP policy regarding public access and recreation.

2. Visual Resources

Santa Barbara City College's Public Works Plan (PWP) also contains a specific policy to protect the visual resources of the beach and shoreline area. Policy "Vis 1" states, in relevant part, "The scenic and visual qualities of the beach and shoreline area are considered a resource of public importance. Development will be sited and designed to be visually compatible with the character of the surrounding area…"

The proposed pipelines replacement project is within the College's East Campus bluff area adjacent to Shoreline Drive. The project vicinity is within an area of designated and protected coastal visual resources. However, the proposed replacement infrastructure will be entirely underground and occupy the same footprint as the existing drainage pipes. Further, the eroded bluff face will be reinforced and repaired and all areas of ground disturbance will be restored with native coastal sage scrub vegetation. Therefore, the project is sited and designed to preserve and enhance existing views to, from and along the ocean and the City Waterfront by the erosion repairs and habitat restoration. The NOID, as submitted, is thus consistent with the College's certified PWP policy regarding the protection of visual resources.

3. Environmentally Sensitive Habitat Areas and Water Quality

Santa Barbara City College's Public Works Plan (PWP) includes several policies intended to protect biological resources. Policy "Bio 1" requires that environmentally sensitive campus habitats will be protected against significant disruption of habitat values and proscribes development within the delineated environmentally significant habitat areas on-campus. However, Policy "Bio 1" also provides that utility lines (namely, water, sewer, gas and electric) may be permitted if no other less environmentally damaging route is feasible and the lines are placed underground and impacts to the habitat are mitigated to the maximum extent feasible. Where necessary, mitigation will be required through a habitat restoration program prepared by a qualified biologist for the area disturbed by construction.

Policy "Bio 1" also includes provisions that address impacts to oak trees on campus. Specifically, "Bio 1" states:

> *Development on campus shall be designed and located in a manner to avoid adverse impacts to oak trees to the maximum extent feasible. In the event that adverse impacts may not be avoided, then mitigation for the removal of an oak tree shall be required on a 10 to 1 basis using native plant species that have been obtained from local genetic stock as close to the mitigation site as possible. The plantings shall be completed within the campus consistent with an oak tree mitigation plan, prepared by a qualified environmental resource specialist. The plan shall specify the preferable time of the year to carry out the plantings and describe supplemental watering requirements that will be necessary, including an irrigation plan. The plan shall also specify performance standards to judge the success of the restoration effort. Implementation of the restoration plan shall commence within ninety (90) days of occupancy of any new development. The mitigation plan shall provide ninety-five percent (95%) oak tree survival success within*

ten (10) years and shall be repeated, if necessary, to provide such success as part of a monitoring program. Plantings shall be maintained in good growing condition throughout the life of the project and, whenever necessary, shall be replaced with new plant materials to ensure continued compliance with the revegetation requirements…

Additionally, Section 2.8 of the PWP provides the following applicable water quality policies:

WQ 1 Minimize Introduction of Pollutants

Design and manage development to minimize the introduction of pollutants into coastal waters (including the ocean, estuaries, wetlands, rivers, streams and lakes) to the maximum extent practicable.

WQ 2 Minimize Increases in Peak Runoff Rate

Design and manage development to minimize increases in peak runoff rate, to avoid detrimental water quality impacts caused by excessive erosion or sedimentation.

WQ 3 Protect Good Water Quality and Restore Impaired Waters

Promote both the protection of good water quality and the restoration of impaired waters…

WQ 9 Minimized Polluted Runoff from Construction.

Minimize erosion, sedimentation, and other polluted runoff from development's construction-related activities, to the maximum extent practicable.

WQ 10 Minimize Land Disturbance During Construction.

Minimize development's land disturbance activities during construction (e.g., clearing, grading, and cut-and-fill), especially in erosive areas (including steep slopes, unstable areas, and erosive soils), to avoid detrimental water quality impacts caused by increased erosion or sedimentation. Incorporate soil stabilization BMPs on disturbed areas as soon as feasible…

<u>Water Quality Development Standards</u>

WQ1 During construction, washing of concrete trucks, paint, equipment, or similar activities shall occur only in areas where polluted water and materials can be contained for subsequent removal from the site. Wash water shall not be discharged to the storm drains, street, drainage ditches, creeks, or wetlands. Areas designated for washing functions shall be at least 100 feet from any storm drain, water body, or sensitive biological resources. The location(s) of the washout area(s) shall be clearly noted at the construction site with signs.

WQ2 Concrete, asphalt, and seal coat shall be applied during dry weather to prevent storm water contamination during roadwork or pavement construction. Storm drains and

> *manholes within the construction area shall be covered when paving or applying seal coat, slurry, fog seal, etc.*
>
> *WQ3 Construction materials and waste such as paint, mortar, concrete slurry, fuels, etc. shall be stored, handled, and disposed of in a manner that minimizes the potential for storm water contamination.*

The proposed project site is within an area designated by the Santa Barbara City College Public Works Plan as the East Campus Coastal Sage Scrub Environmentally Sensitive Habitat Area. The Habitat Restoration Plan submitted by the College provides a detailed characterization of the native and non-native plant species that are present at the proposed project site.

The native component of the Coastal Sage Scrub Habitat includes California live oak (*Quercus agrifolia*), big saltbush (*Atriplex lentiformis*), giant wildrye (*Elymus condensatus*), lemonade sumac (*Rhus integrifolia*), tree poppy (*Dendromecon rigida*), Mendocino bushmallow (*Malacothamnus fasciculatus*), California poppy (*Eschscholzia californica*), coastal sagebrush (*Artemisia californica*), and blue elderberry (*Sambucus nigra* ssp. *caerulea*).

The Coastal Sage Scrub Habitat contains evidence of physical degradation to the soils caused by bank erosion from the subject malfunctioning drainage pipes. Additionally, the Coastal Sage Scrub Habitat has a high cover of non-native plant species dominated by ripgut brome (*Bromus diandrus*) and associated slender oat (*Avena barbata*), mouse barley (*Hordeum murinum*), castorbean (*Ricinus communis*), black mustard (*Brassica nigra*), tree tobacco (*Nicotiana glauca*), bur clover (*Medicago polymorpha*), musky stork's bill (*Erodium moschatum*), lambsquarters (*Chenopodium album*), sweet fennel (*Foeniculum vulgare*), smilograss (*Stipa miliacea*) and annual yellow sweetclover (*Melilotus indicus*).

Throughout all vegetation removal and clearing associated with the construction of the East Campus Storm Drain Replacement project, a resource specialist will be present to ensure native vegetation outside of the project footprint is not disturbed. If necessary, construction fencing may be utilized to delineate the limits of the construction footprint and preserve all native vegetation outside of the construction footprint.

As described above, the College considered all feasible alternatives to avoid removal of one mature coast live oak tree including directional drilling and pipeline realignment. However, the alternatives analysis determined that all feasible alternatives would result in a substantial increase in grading and disturbance to coastal sage scrub habitat.

Additionally, the coast live oak tree has grown directly on top of the upper section of the failed drain pipes and an existing sidewalk extends beneath the tree's canopy. The required excavation for the proposed project and the transplanting of the tree would result in significant damage to the tree's root structure, such that the tree would lose approximately 70 percent or more of its root mass. Thus, the potential for successfully transplanting the tree is extremely low.

The Habitat Restoration Plan (HRP) proposes two types of restoration activities, namely (1) California coast live oak tree plantings and (2) coastal sage scrub native restoration planting. The College is proposing to mitigate the removal of one California coast live oak by planting ten California coast live oaks (15-gallon container size) within or adjacent to designated oak woodland habitat within the East Campus Oak Woodland Environmentally Sensitive Habitat Area to enhance existing Campus habitat values. The College is proposing to monitor the California live oak plantings for ten years. Maintenance will include hand watering when necessary, weed removal and replacement of any of the ten seedlings should they die within the ten year period. The performance criteria that will be used to determine the success of the California coast live oak plantings is detailed in the Table below.

Year	Tree Survival [1]
1	8
2	9
3	10
4	10
5	10
6	10
7	10
8	10
9	10
10	10

After initial planting of the ten California coast live oaks is completed, monitoring will consist of quarterly field monitoring visits conducted by a resources specialist to determine initial survival rates and the general health of the trees. Evaluation will be based on quarterly visual assessments for years one through ten of the restoration project. Assessments will include analysis of tree survival, general health of the trees and height of the trees. If a California coast live oak tree is observed as dead, it will be replaced with a new California coast live oak tree to meet the final success criteria of 10 California live oak trees. All assessment data will be submitted annually to the California Coastal Commission.

The California live oak species used for restoration will be obtained from the local area. If feasible, acorns will be collected from the project site. Additionally, the HRP proposes the use of tree cages to prevent animal foraging from damaging the plantings. Four-foot cages will be buried one foot underground and extend approximately 3 feet above ground. The cages will be utilized for at least three years to ensure that the seedlings are protected.

[1] Tree survival is the total number of installed trees alive for subsequent years; survival is measured on surviving plants from the previous year plus replaced dead plants.

The 0.04 acre of impacts to coastal sage scrub habitat from construction activities associated with the replacement of the drainage pipes will be restored at a ratio of 3:1 within the existing Coastal Sage Scrub Environmentally Sensitive Habitat Area on the College's East Campus bluff. Therefore, a total of 0.12 acre of coastal sage scrub habitat shall be restored. The proposed Coastal Sage Scrub Habitat restoration will restore all areas of the project site impacted by construction, fill gaps in the coastal sage scrub habitat to achieve a more continuous habitat coverage, remove non-native species and replace with native species, and stabilize the eroded East Campus bluff.

All plantings will consist of seeds of native shrub and forb species from local plants and seed stock. The coastal sage scrub planting palette will contain the perennial, larger shrubby native species listed in the Table below.

Scientific Name	**Common Name**	**Container Size**	**Average Spacing**
Artemisia californica	coastal sagebrush	1 gallon	4 feet
Atriplex lentiformis	big saltbush	1 gallon	10 feet
Baccharis pilularis	coyotebrush	1 gallon	4 feet
Dendromecon rigida	tree poppy	1 gallon	5 feet
Elymus condensatus	giant wildrye	1 gallon	4 feet
Encelia californica	California brittlebush	1 gallon	3 feet
Eschscholzia californica	California poppy	4 inch	1 feet
Frangula californica	California buckthorn	1 gallon	3 feet
Heteromeles arbutifolia	toyon	1 gallon	10 feet
Keckiella cordifolia	heartleaf keckiella	1 gallon	1 foot
Malocothamnus fasciculatus	Mendocino bushmallow	1 gallon	3 feet
Malacothrix saxatilis	cliff desertdandelion	4 inch	1 foot
Pseudognaphalium californicum	ladies' tobacco	4 inch	1 foot
Rhus integrifolia	lemonade sumac	1 gallon	10 feet
Ribes speciosum	fuchsiaflower gooseberry	1 gallon	2 feet
Rosa californica	California wildrose	1 gallon	3 feet
Rubus ursinus	California blackberry	1 gallon	5 feet
Salvia spathacea	hummingbird sage	1 gallon	1 foot
Sambucus nigra ssp. *caerulea*	blue elderberry	1 gallon	10 feet
Scrophularia californica	California figwort	1 gallon	2 feet
Stipa pulchra	purple needlegrass	1 gallon	1 foot

The performance criteria that will be used to determine the success of the coastal sage scrub brush planting is detailed in the Table below.

Year	Percent Survival [2]	Percent Cover [3]
1	90	70
2	95	80
3	100	90
4	100	90
5	100	90

After the initial installation planting is completed for the coastal sage scrub habitat, monitoring will consist of quarterly qualitative field monitoring visits conducted by a resources specialist to determine initial survival rates and percent cover of container plants. Evaluation will be based on quarterly qualitative visual assessments for years one through three and quantitative point-transect analysis for years four and five of the restoration project. Qualitative and quantitative assessments will include analysis of vegetative cover, percent survival and species diversity. All qualitative analyses will be submitted to the California Coastal Commission in annual monitoring reports.

Native habitat restoration will commence in the fall to allow plantings the benefit of seasonal precipitation. Before restoration begins, restoration areas will be delineated with fencing and photograph points will be established to allow clear monitoring subsequent to restoration.

The pipelines replacement project will necessitate the removal of one coast live oak and disturbance to designated Coastal Sage Scrub Brush Environmentally Sensitive Habitat Area. However, the proposed project is consistent with the policies of the certified PWP allowing for the maintenance of water utility lines within Environmentally Sensitive Habitat Area and the College has submitted a comprehensive Habitat Restoration Plan to mitigate all impacts to biological resources at the project site. Further, the College has proposed a Water Quality Management Plan that will prevent construction related activities from polluting water quality at the project site and flows leaving the project site. Thus, the NOID, as submitted, is consistent with the College's certified PWP policies regarding water quality and environmentally sensitive habitat areas.

[2] Percent survival is the total number of installed container stock shrubs alive divided by the total number planted the first year; for subsequent years, survival is measured on surviving plants from the previous year plus replaced dead plants.

[3] Percent cover is the total percent cover of all native plant species, including trees, shrubs and herbs from contained stock or hydroseed; a total percent cover of natives and non-natives should be maintained at 95-100 percent to prevent erosion.

4. Geologic Stability

Santa Barbara City College's Public Works Plan (PWP) includes several policies that protect the geologic integrity of the campus and the surrounding areas. The PWP states the following, in relevant part:

> *Geo 1 New development will be designed and sited to minimize risks to life and property, to assure structural integrity, and to avoid erosion, geologic instability or destruction of the site…*
>
> *If construction is to occur over the rainy season, the report shall also identify temporary erosion control measures such as berms and appropriate locating and covering of stockpiled soils to minimize erosion of and from the site…*
>
> *Geo 2 Best available erosion and sediment control measures shall be implemented during grading and construction. Best available erosion and sediment control measures shall include but not be limited to the use of sediment basins, gravel bags, silt fences, geo-bags or gravel and geotextile fabric berms, erosion control blankets, coir rolls, jute net and straw bales. Drainage channel inlets shall be protected from sediment-laden waters by use of inlet protection devices such as gravel bag barriers, filter fabric fences, block and gravel filters, and excavated inlet sediment traps. Sediment control measures shall be maintained for the duration of the grading period and until graded areas have been stabilized by structures, long-term erosion control measures, or landscaping.*

The project site is composed of highly friable soils and is highly eroded as a result of the storm drain pipe failure. In order to prevent further erosion of the bluff face during construction, the College is proposing to implement temporary erosion control measures that include a catch basin gravel bag inlet sediment barrier, silt fencing to prevent sediment from leaving the site, and fiber roll installation on the slope. Further, the College is proposing to implement erosion control Best Management Practices (BMP's) throughout all construction and habitat restoration activities to prevent any increased erosion of soil on the steep slope. The College has also agreed to restrict any grading at the project site to the dry season.

Additionally, the College is proposing to install a Tensar BX1200 geogrid with 12 inch vertical spacing at both the top of the slope and the toe of the slope to provide reinforcement and stabilization of the eroded bluff face. The proposed Habitat Restoration Plan will remove non-native plant species on the bluff that have displaced native plant species and the replacement with native coastal sage scrub brush species will also function to increase the stability of the slope.

As submitted, NOID CSB-NOID-0002-15 proposes to significantly improve the geologic stability of the project site through stabilization of the existing East Campus eroded bluff face. Thus, the NOID is consistent with the College's certified PWP policies regarding geologic stability.

IV. CALIFORNIA ENVIRONMENTAL QUALITY ACT

Pursuant to Section 21080.9 of the California Environmental Quality Act ("CEQA"), the Coastal Commission is the lead agency responsible for reviewing Public Works Plans (PWP) and Notices of Impending Development for compliance with CEQA. In addition, Section 13096 of the Commission's administrative regulations requires Commission approval of Notices of Impending Development to be supported by a finding showing the application to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). The Secretary of Resources Agency has determined that the Commission's program of reviewing and certifying PWPs qualifies for certification under Section 21080.5 of CEQA.

Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment. Section 21080.5(d)(I) of CEQA and Section 13540(f) of the California Code of Regulations require that the Commission not approve or adopt a PWP, "…if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment." For the reasons discussed in this report, the proposed Notice of Impending Development is consistent with the policies and provisions of Santa Barbara City College's certified Public Works Plan and no feasible alternatives or mitigation measures are available which would substantially lessen any significant adverse effects which the approval would have on the environment. Therefore, the Commission finds that the submitted Notice of Impending Development is consistent with CEQA and the applicable provisions of the Santa Barbara City College Public Works Plan.

APPENDIX A

Santa Barbara City College 1985 Public Works Plan; Santa Barbara City College East Campus Storm Drain Coastal Sage Scrub Sensitive Habitat Restoration Plan dated June 2015 and prepared by Dudek; Oak Tree Transplanting Assessment dated November 30, 2014 and prepared by Bill Spiewak; Oak Tree Transplanting Assessment dated December 9, 2014 and prepared by Michael Huff; Oak Tree Transplanting Assessment dated June 17, 2015 and prepared by Michael Huff

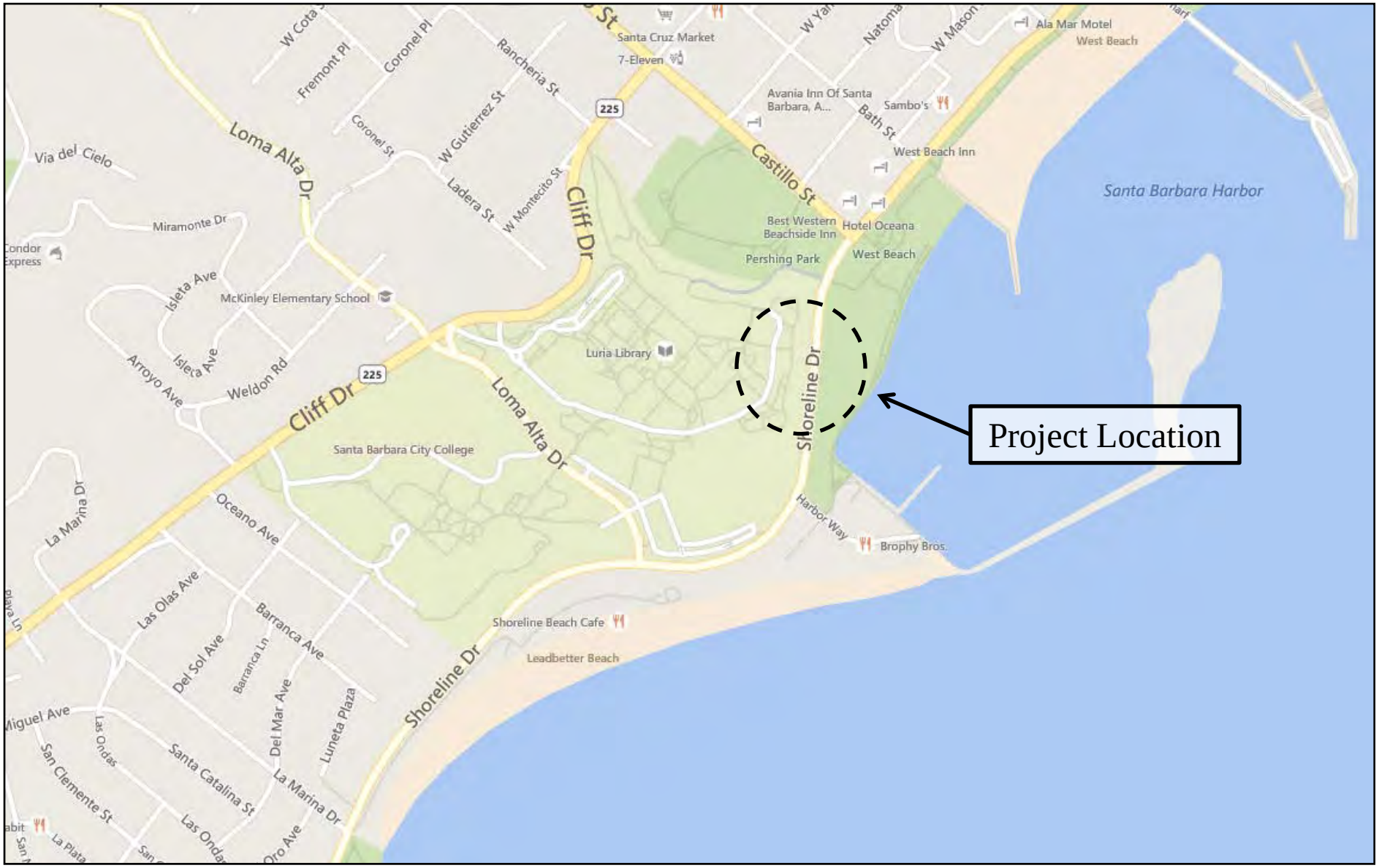


Exhibit 1
Vicinity Map
CSB-NOID-0002-15

Exhibit 2
Project Site Aerial Photo
CSB-NOID-0002-15

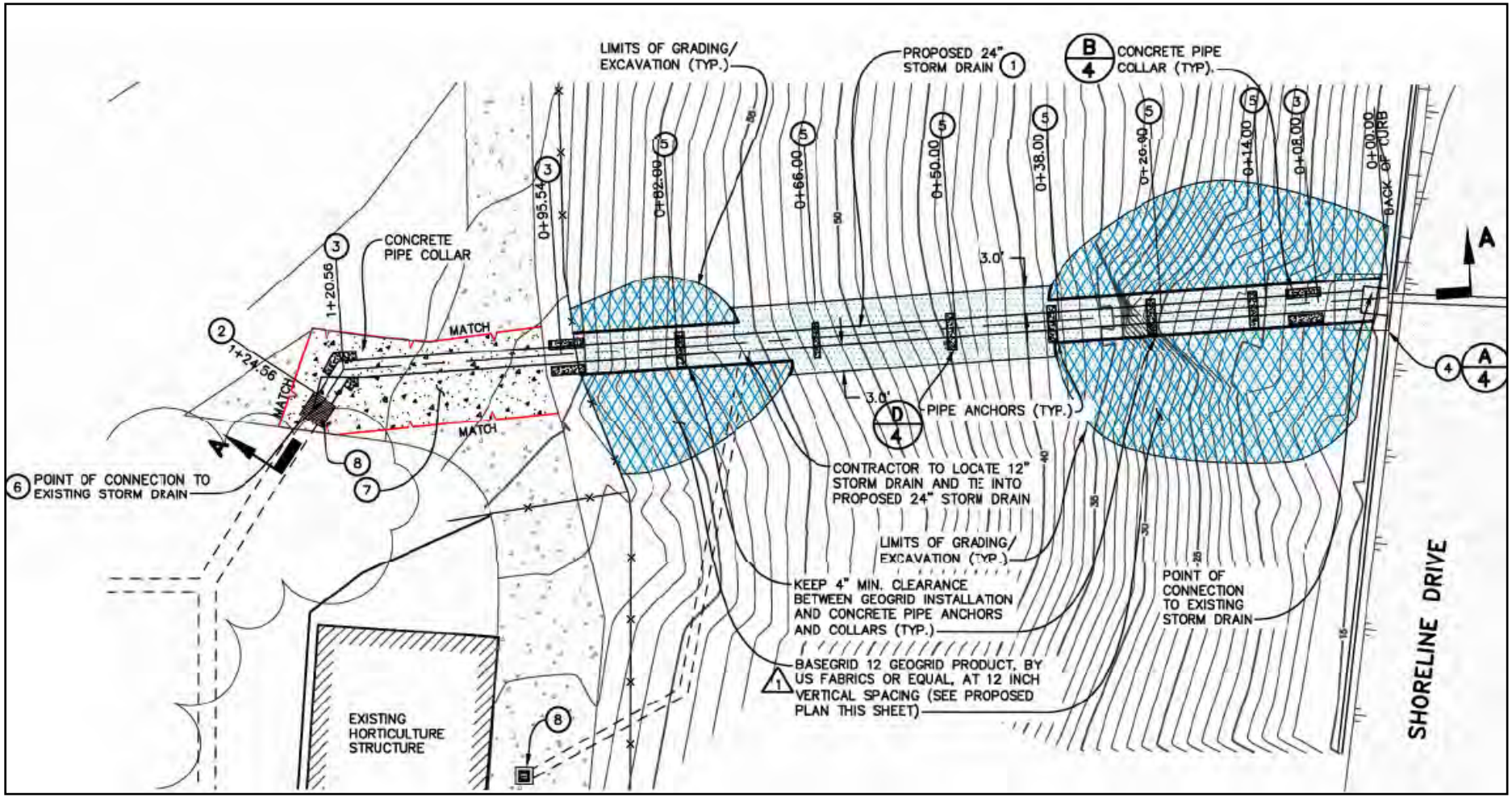
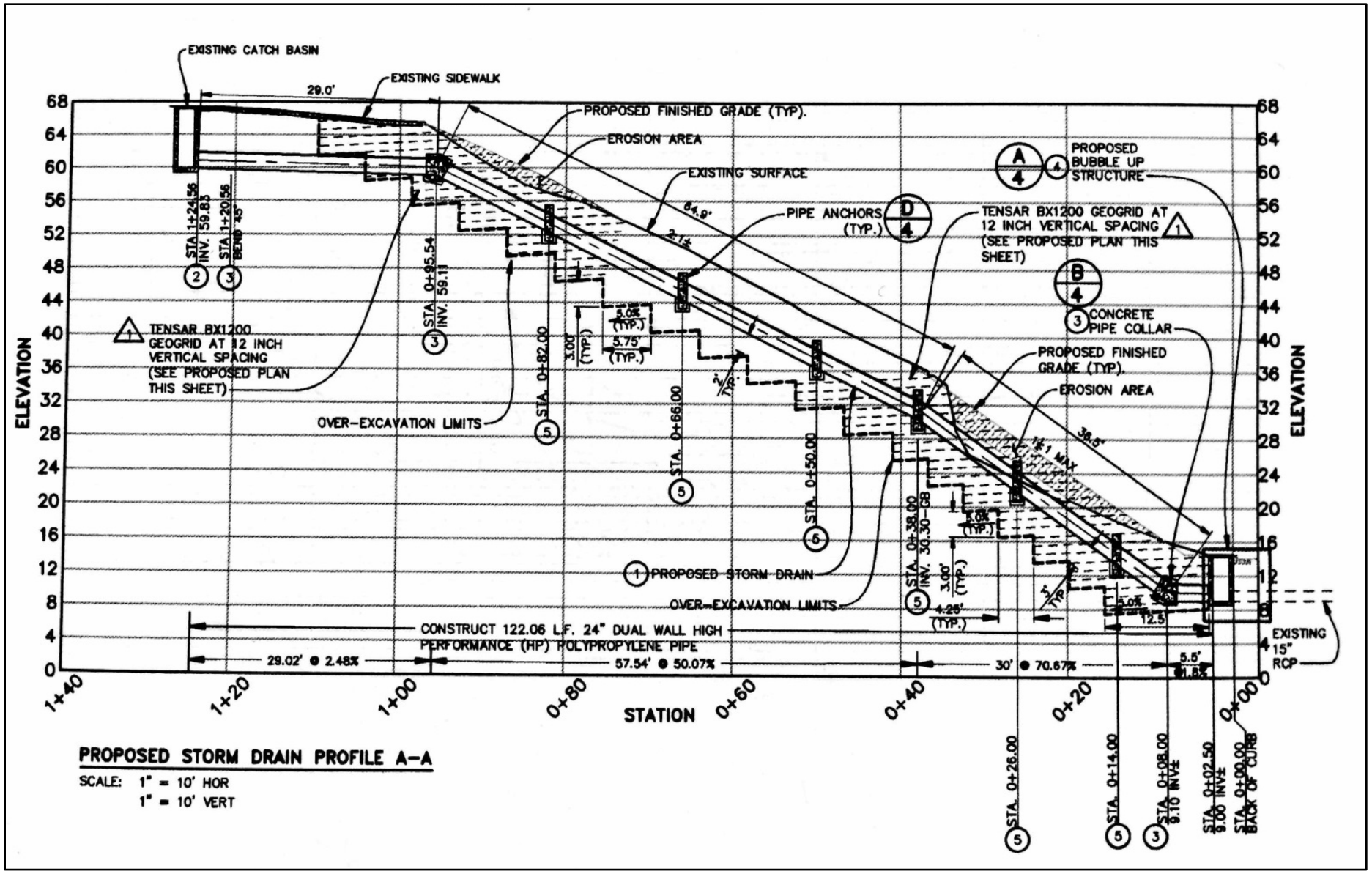


Exhibit 3
Project Site Plan
CSB-NOID-0002-15



PROPOSED STORM DRAIN PROFILE A-A

SCALE: 1" = 10' HOR
1" = 10' VERT

Exhibit 4
Proposed Drainage Pipe Profile
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Exhibit 5
Photo of Existing Bluff Erosion
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Exhibit 6
Photo of Mature Coast Live Oak Tree Planned for Removal
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