Item 4g

CALIFORNIA OCEAN PROTECTION COUNCIL

Staff Recommendation
June 29, 2016

North Campus Open Space Coastal Wetlands Restoration

Amy Vierra, Deputy Director

RECOMMENDED ACTION: Authorization to disburse up to $1,000,000 to the Regents of the University of California, Santa Barbara to increase by 8 acres the size of a current large scale restoration effort of the upper arms of the Devereux Slough into a functional wetland system, and adoption of findings under the California Environmental Quality Act.

LOCATION: Devereux Slough, unincorporated Santa Barbara County

STRATEGIC PLAN OBJECTIVE(S): Sustainable Fisheries and Marine Ecosystems; Climate Change

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EXHIBITS

Exhibit A: Project Location and Site Map

Exhibit B: Site images

Exhibit C: Letters of support

Exhibit D: Initial Study/Mitigated Negative Declaration

Exhibit E: Mitigation, Monitoring, and Reporting Program

Exhibit F: Draft Notice of Determination for Ocean Protection Council potential action

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FINDINGS AND RESOLUTION:

Staff recommends that the Ocean Protection Council (OPC) adopt the following findings:
"Based on the accompanying staff report and attached exhibits, the Ocean Protection Council hereby finds that:

1) The proposed project is consistent with the purposes of Division 26.5 of the Public Resources Code, the Ocean Protection Act.
2) The proposed projects are consistent with the Ocean Protection Council's Proposition 1 grant guidelines (adopted September 2015).

3) As a responsible agency, the OPC has independently reviewed and considered the IS/MND, adopted by UCSB on March 29, 2016, attached as Exhibit D to the accompanying staff recommendation. Based on the record as a whole, the OPC finds that the proposed project, avoids, reduces, or mitigates the possible effects of the project to a level of insignificance and that there is no substantial evidence that the project, as mitigated, may have a significant effect on the environment, as defined by the CEQA Guidelines, 14 CCR §15382."
4) As a responsible agency, the OPC adopts the Mitigation, Monitoring and Reporting Program (attached as Exhibit E).

Staff further recommends that the OPC adopt the following resolution pursuant to Sections 35500 *et seq.* of the Public Resources Code:

"The California Ocean Protection Council hereby approves the disbursement of up to $1,000,000 to the Regents of the University of California, Santa Barbara to increase by 8 acres the size of a current large scale restoration effort of the upper arms of the Devereux Slough into a functional wetland system. This authorization is subject to the following conditions:

1. Prior to the disbursement of any funds, The Regents of the University of California, Santa Barbara shall submit for the review and written approval of the OPC's Executive Director the following:
    a. A detailed work program, including budget, schedule and list of contractors to be retained for the project;
    b. Evidence that all necessary permits and approvals have been obtained;
    c. A plan to create signage to acknowledge OPC and Proposition 1 funding;
    d. A clear and detailed plan about how work funded by OPC will be documented separate from the several other funding sources for the larger project.

PROJECT SUMMARY:
The Regents of the University of California, Santa Barbara have developed the large-scale North Campus Open Space (NCOS) wetland restoration project to return the site of a golf course (and adjacent areas) into a 106 acre functional wetland system that will provide for carbon sequestration, provide important transgression space for estuarine habitats in the face of sea-level rise, and reduce localized flooding by increasing the water storage capacity of the area.

In 1965 the Ocean Meadows Golf Course was developed on the site by filling the historic northern extent of Devereux Slough by moving approximately 500,000 cubic yards of soil from adjacent lands. The golf course was closed in 2013 after the parcel was purchased by the Trust for Public Land, who then donated the property to UCSB with the obligation that it be maintained as permanent open space; be used to provide recreation opportunities; provide coastal wetland and wildlife habitat; that the University implement conservation and restoration programs on the site; and that the site be used for research and environmental activities.

Restoration of the former upper portion of the Devereux Slough would be accomplished by excavating approximately 355,000 cubic yards of fill from the filled estuary and return it to the onsite, degraded, upland borrow site (Exhibit A, Figure 1). The proposed soil movement would, at least partially, reverse the excavation and fill actions that were conducted to develop the golf course. To create a functional hydrologic connection between the restored estuary habitats on the project site and the lower Devereux Slough, the project would remove a sheet pile water control structure (sill) and associated armoring from Devereux Creek at the Devereux Creek Bridge.

The activities proposed for funding by the Ocean Protection Council would expand, by 8 acres, the size of this large scale restoration effort. The OPC funding will be used for construction as well as restoration and water quality monitoring for the NCOS wetland restoration project. The vegetation and wildlife-related restoration portions will be implemented by UCSB's Cheadle Center for Biodiversity and Ecological Restoration (CCBER), which currently manages approximately 200 acres of campus lands for their ecological function and implements restoration projects in a diversity of habitat types (Exhibit A, Figure 2).

Site Description:
The University of California at Santa Barbara (USCB) campus is located in an unincorporated area of Santa Barbara County, near the City of Goleta and the community of Isla Vista, and approximately 10 miles west of the City of Santa Barbara. This general area is referred to as the South Coast region of the County and occupies a coastal plain about three miles wide between the Pacific Ocean and the foothills of the Santa Ynez Mountains (Exhibit A, Figure 3). The UCSB campus encompasses a total of approximately 1,056 acres and is comprised of four areas known as the Main Campus, Storke Campus, West Campus, and North Campus. Land uses on the North Campus are mostly open space with some student and faculty housing. Housing projects on the North Campus include the 151-unit Sierra Madre student housing project and the 154-unit Ocean Walk faculty housing project. The NCOS is located on the 238-acre UCSB North Campus, which is generally bordered by the City of Goleta to the east, west and north; and the UCSB West Campus to the south.

The NCOS restoration project is located on three parcels, each owned by UCSB: the South Parcel (68.9 acres), Whittier Parcel (3.70 acres) and the former Ocean Meadows Golf Course (63.8 acres) (Exhibit A, Figure 4). The NCOS restoration project encompasses 136.4 acres located at the downstream end of a 3.5-square mile watershed that includes Devereux Creek, Phelps Creek (also known as El Encanto Creek north of the project site) and several unnamed tributaries.

Project History
The Ocean Meadows Golf Course was created in 1965 when approximately 500,000 cubic yards of soil was removed from the South Parcel and other adjacent lands and used to fill the historic northern extent of the Devereux Slough, leaving a ditch-like Devereux Creek channel to convey drainage through the site (Exhibit A, Figure 5). The golf course was closed in 2013 after the parcel was purchased by the Trust for Public Land, who then donated the property to UCSB

with the obligation that it be maintained as permanent open space; be used to provide recreation opportunities; provide coastal wetland and wildlife habitat; that the University implement conservation and restoration programs on the site; and that the site be used for research and environmental activities. The golf course parcel was donated to UCSB also to expand the open space conservation program known as the Ellwood-Devereux Coast Open Space Plan Area, which includes the NCOS restoration project.

The Ellwood-Devereux Open Space and Habitat Management Plan (2004), which includes the, 652-acre Ellwood-Devereux Open Space Plan Area, was designed to comprehensively plan the preservation, management, and development of the Ellwood-Devereux area. This cooperative effort by UCSB, the City of Goleta and the County of Santa Barbara involved comprehensively planning approach to facilitate improved public coastal access, and the preservation and enhancement of recreation areas, natural land, and marine environment resources. A major component of the Plan was the proposed relocation of development away from coastal areas to the northern perimeter of the planning area where it would be clustered contiguous to existing development, roads, and services. Through the transfer of development rights, potential new residential development on the Ellwood Mesa was transferred to the north side of Santa Barbara Shores Park (the Comstock Homes project), and potential housing development on the South Parcel was transferred to an area north of the golf course parcel (the Ocean Walk project).

PROJECT FINANCING

Ocean Protection Council	**$1,000,000**
California Natural Resources Agency Urban Greening	$960,000
Department of Water Resources Urban Streams	$930,000
California Department of Fish and Wildlife GHG Sequestration	$900,000
California Department of Fish and Wildlife Prop 1	$1,000,000
U.S. Fish and Wildlife Service- National Coastal Wetland Conservation Program through State Coastal Conservancy (contract pending)	$1,672,463
CalTrans Active Transportation Program (contract pending)	$2,449,000
County Flood Control	$100,000
UCSB	$500,000
TOTAL	$9,511,463

NOTE: The values above represent the notifications received by UCSB for intent to fund or complete contracts. Full restoration project will likely require ~$14,000,000 to completely finish the work. Sources for the remaining ~$4,500,000 have been identified but have not yet been secured by UCSB.

The expected source of Ocean Protection Council funds for this project is the fiscal year 2015-16 appropriation to the Natural Resources Agency pursuant to the Water Quality, Supply, and Infrastructure Improvement Act of 2014 (Proposition 1, Water Code §79700 et. seq.). Funds appropriated to the Natural Resources Agency derive from Chapter 6 (commencing with §79730) and may be used "for multibenefit water quality, water supply, and watershed protection and restoration efforts for the watersheds of the state" (Water code §79731). Section 79732 identifies specific purposes of Chapter 6, which include restoration of wetlands, reduction of pollution into coastal waters, and watershed adaptation projects to reduce the impacts of climate change on California's communities and ecosystems.

The proposed project is an appropriate use of Proposition 1 funds because it has multibenefits and will restore the area back into a functioning wetland ecosystem. The benefits of the project include increased carbon sequestration, improved resiliency to climate change impacts, habitat for important species, and improved water quality for the area.

The proposed project was selected through a competitive grant process under the Ocean Protection Council's *Proposition 1 Grant Guidelines* adopted in September 2015 ("Prop 1 Guidelines") (see §79706(a)). The proposed project meets each of the evaluation criteria in the Prop 1 Guidelines as described in further below.

CONSISTENCY WITH CALIFORNIA OCEAN PROTECTION ACT:
The proposed project is consistent with the Ocean Protection Act, Division 26.5 of the Public Resources Code, because it is consistent with trust-fund allowable projects, defined in Public Resources Code Section 35650(b)(2) as projects which:

1) Improve coastal water quality.
2) Allow for increased public access to, and enjoyment of, ocean and coastal resources, consistent with sustainable, long-term protection and conservation of those resources.
3) Improve management, conservation, and protection of coastal waters and ocean ecosystems.
4) Provide monitoring and scientific data to improve state efforts to protect and conserve ocean resources.
5) Protect, conserve, and restore coastal waters and ocean ecosystems

CONSISTENCY WITH THE OPC'S STRATEGIC PLAN:
This project implements Focal Area Climate Change: The project will expand the flood capacity of the area and allow for transitional habitat to potential sea-level rise impacts.

This project implements Focal Area Sustainable Fisheries and Marine Ecosystems: The restoration of the historic wetland will promote populations of endemic aquatic fish species as well as provide habitat for migratory birds.

CONSISTENCY WITH THE OPC'S PROPOSITION 1 GUIDELINES:
The following are the criteria that were applied to the applications in either the Letter of Intent

or full proposal stage of the evaluation.

Chapter 6 of Proposition 1 purposes:
Purpose (2) Implement watershed adaptation projects in order to reduce the impacts of climate change on California's communities and ecosystems;
Purpose (4) Protect and restore aquatic , wetland, and migratory bird ecosystems, including fish and wildlife corridors;
Purpose (9) Protect and restore rural and urban watershed health to improve watershed storage capacity, forest health, protection of life and property, stormwater resource management, and greenhouse gas reduction;
Purpose (10) Protect and restore coastal watersheds, including, but not limited to, bays, marine estuaries, and nearshore ecosystems;
Purpose (11) Reduce pollution or contamination of rivers, lakes, streams, or coastal waters, prevent and remediate mercury contamination from legacy mines, and protect or restore natural system functions that contribute to water supply, water quality, or flood management;
Purpose (12) Assist in the recovery of endangered, threatened, or migratory species by improving watershed health, instream flows, fish passage, coastal or inland wetland restoration, or other means, such as natural community conservation plan and habitat conservation plan implementation

OPC's Key Issue Areas for Prop 1 Funding:
Coastal and Ocean Water Quality Impacts; Climate Change

Multi-benefits:
Reduction in greenhouse gas (GHG) emissions and subsequent improved carbon sequestration will result from converting a golf course which had multiple vehicle trips and emissions associated with patron travel, active ground management and irrigation, to a salt marsh and estuarine system which will sequester carbon and be monitored with California Department of Fish and Wildlife (CDFW) GHG Sequestration grant funds. The project provides improved resiliency to the community because it converts private property to public open space in a zone between the sea and private homes predicted to be affected by sea level rise. In addition, the excavation of soil is designed to provide transgression space for salt marsh habitats likely to be lost in the lower portion of the wetland under the predicted sea-level scenarios. The project will expand the acreage of estuarine habitats by 50 acres and result in 136 total acres of restored watershed and wetland habitats which will provide habitat for endangered species such as the tidewater goby and Western snowy plover and improve the functionality of this site currently limited to a channelized creek and weed-dominated upland. The excavation of 350,000 cubic yards of fill will significantly increase the water holding capacity of the wetland system (double it by 180 acre-feet) and provide a more complex and integrated system for water filtration and reduce localized flooding. The larger project involves the construction of walking trails will also result in increased public access to this area.

Ability to adapt to impacts of climate change:
The project is designed specifically to address sea level rise as well as climate change impacts

associated with increased storm intensity that currently threaten the existing Devereux Slough and the diversity of its wetland habitats. The larger project, which encompasses the OPC funded work, will double the capacity of the system to handle storm flows (180 to 360 acre ft) and expand the area of salt marsh, mudflat, sub-tidal and high marsh habitat designed to provide transitional room.

California Water Action Plan Goals:
This project implements Action Item 1: Protect and Restore Important Ecosystems; 2) Expand Water Storage and; 3) Increase Flood Protection through excavation of fill from the former upper arms of Devereux Slough (filled in 1965 to create a golf course) and will restore an intermittently tidal wetland with diverse coastal habitats.

Removes or reduces multiple stressors to the environment:
The project will remove stressors associated with former golf course operations that released reclaimed water into the system, focused human impacts (e.g dogs) on the trail system, promoted weed seed sources. As such, the removal of fill from the former extent of the wetland and restoration of the degraded site and fill area with native plants sourced locally will significantly improve the function and resilience of the immediate coastal watershed thus reducing coastal stressors associated with erosion and pollution from the current degraded conditions on site.

Utilizes green infrastructure, natural systems, or systems that mimic natural systems:
The project includes bioswales and intermediate wetlands between the storm drains and estuarine system which are natural systems that support ecosystem services. Green infrastructure is reflected in trail surfaces being permeable, such as class two road bases or natural substrates. The design of the system creates a natural flood plain which promotes natural hydrologic processes supporting natural flow regimes which support stabilizing plant communities and processes. The project will recycle more than 1.2 miles of cement walkways currently on site and demolish and recycle an existing clubhouse.

New, innovative, or proven technologies or practices:
The project is innovative in its use of bioswales and intermediate wetlands to improve water quality. In addition the design of sea level rise adaptation features has been integrated with ground water index-well data which provides multiple benefits because the high water table is protected and will support diverse wetland types including seeps, back dune swales and high marsh habitats for transgression space. In addition high water table will support endangered Ventura Marsh milk-vetch.

Sustainable outcomes:
Sustainable outcomes for a diversity of coastal wetland habitat types will be secured through the design which includes more than 13 acres of higher elevation salt marsh that will provide transgression space for the existing remnant slough habitats that would otherwise convert to sub-tidal and mudflats with sea level rise between 2070 and 2150. Increased flood capacity is also adaptive to climate change impacts which predict high intensity storm events in the

coming century which will protect trails.

Ability to begin implementing the project in timely fashion:
The project description and environmental documents have been completed and approved by the implementing agency, UCSB. Remaining permits will be complete and secure by July 2016 with construction anticipated to begin in September 2016. More than $9 million has been secured for the large scale project and likely sources for an additional $5-7 million have been identified, which will support timely implementation of the full restoration vision.

Provide mapping/data that can enhance current understanding:
Funding from the Cap and Trade program through CDFW's GHG sequestration program is supporting a comprehensive study on the capacity of intermittently tidal ecosystems to support carbon sequestration in the salt marsh. The data will be published and on-going monitoring of accretion and sequestration will be conducted. Maps and project reports will be uploaded to the EcoAtlas website.

Demonstrates solutions that can be implemented regionally and/or statewide:
While the design approach is fairly straight-forward in terms of excavating fill from a former wetland, the design and degree of removal is unique in its consideration of sea level rise and sub-terranean water levels and their potential function in supporting diverse habitat types. These results will be transferable to other projects in intermittently open tidal systems and those facing similar threats and opportunities.

Demonstrates experience successfully implementing similar projects or demonstrates appropriate and necessary partnerships to complete the project.
UCSB has more than 40 years of experience overseeing the construction of many multi-million dollar building and landscaping projects on campus. There are project managers, engineers, accountants, lawyers and contract specialists, inspectors, planners, architects and other relevant personnel capable of overseeing projects of this scale from conception through completion. UCSB's CCBER implements ecological restoration associated with those building projects and grant-funded restoration on approximately 200 acres of campus open space lands. CCBER also has experience conducting a wide variety of monitoring, from water quality and hydrology to vegetation and bird monitoring. CCBER will be overseeing the implementation of the ecological restoration and monitoring using its own staff (14), students, California Conservation Corps, contract labor and volunteers. CCBER will collect all seed (due to its commitment to use locally sourced materials). A portion of the plants will be grown in the CCBER nursery and local nurseries experienced in native-plant propagation using CCBER-collected material will grow the balance.

Consistent with best available science:
The project relies on the best available science as the basis for the design through three primary avenues: a novel quantified conceptual model (QCM Model), a localized sea-level rise model and a CDFW-funded carbon sequestration measurement methodology. A QCM model was developed through a collaborative effort between Environmental Science Associates (ESA,

Inc.) and a UCSB graduate student for the local intermittently open coastal estuaries. This model includes stream flows, evaporation, beach berm seepage, wave overtopping, tidal flushing, salinity regimes, and mouth breaching models as components to the system. The QCM was also designed to integrate the latest recommendations and findings regarding sea level rise; thus the elevations of habitats, bridges and trails are designed to accommodate these predictions for future water elevations and flood regimes. Additionally the most recent approved methods for documenting the carbon sequestration benefits of the salt marsh portions of the project will be used as part of the CDFW-GHG Sequestration research project to document carbon sequestration.

Demonstrates a clear and reasonable method for measuring and reporting effectiveness of project:
The long term success of the project will be reflected through a number of key measures regarding both the success of the restoration project work (e.g. plant and habitat establishment and stability) and the key supporting functions: hydrology-related reductions in flooding, tidal prism and adaptation to sea level rise; endangered species benefits such as presence of tidewater goby and nesting by Western snowy plover; public access (trail function and human impact assessment (e.g. trash and dogs)). Ongoing monitoring to document progress and identify potential impacts or problems with reaching additional long term goals will be funded through a combination of UCSB commitment as a land steward for the site and endowment funds currently being raised.

Likelihood of project to fulfill its stated objectives:
Given the wide variety of funders for the large scale NCOS restoration project, there is a diverse set of oversight to ensure that the project's goals and budget are maintained in accordance with the planned timeline. In addition, the background of the applicant and level of previous work illustrate a commitment to restoration projects and provide good basis that this project will fulfill its objective.

Community support as well as support from outside local area:
The project has wide support from local, state, and national officials as well as notable environmental organizations. Beyond the received letters of support (Exhibit C), the funding from several different State entities provides ample support from environmental professionals to the merits of this project.

Bonus points:

Advances the management individual marine managed areas (MMAs) or the statewide MMA network:
The Campus Point State Marine Conservation area stretches across the mouth of Devereux Slough and is directly connected to this restoration project during periods when the system is tidal. The project improves the primary coastal wetland that supplies water to this ecosystem and restoration of the extent of the system will improve water quality and provide expanded refugia for species such as tidewater goby, guitar fish, killifish, nesting western snowy plover

and foraging California least tern.

Advances the resiliency of marine, estuarine, and diadromous fish populations and the human communities that depend upon them in the face of a changing climate.
The Tidewater Goby is an endangered fish that can be considered diadromous, although not a fisheries fish. Devereux Slough is specifically identified as an expansion area for habitat for this unique species which is adapted to these intermittently open estuarine systems. The trails and interpretive signs will provide additional benefit to the communities and facilitate the protection of this habitat type across the state through an enlightened electorate.

Benefits disadvantaged communities:
The project is located within a 'block' and 'tract' labeled as "Severely Disadvantaged" and adjacent to a 'place' labeled "Severely Disadvantaged". The benefits to this community are diverse and include the 3 miles of trail proposed as part of the larger project that will connect the community to the larger, 652 acre, Ellwood Devereux Open Space and provide recreational and health benefits to local residents. The trail system will support a safe route to school for students attending Isla Vista School that is removed from the primary route along Storke Road where travel speeds exceed 45 mph. The trail system will include interpretive signs and educational events which will provide additional learning opportunities for residents of this area regarding greenhouse gas sequestration, sea level rise, wetland functions related to water quality and stormwater storage, habitat functions and more.

Leverages >100% matching funds:
To date more than seven significant grants have been awarded to the project totaling more than $9 million dollars. The OPC funding will enable UCSB to move towards the larger goal of an estimated $14,000,000 required to achieve the full restoration of the area.

COMPLIANCE WITH CEQA:
To comply with the California Environmental Quality Act ("CEQA"), UCSB, the land owner and lead agency for the proposed project, prepared the "North Campus Open Space Restoration Project Initial Study and MND" ("IS/MND") (Exhibit D). The IS/MND tiers from the UCSB 2010 Long Range Development Plan (LRDP) Final Environmental Impact Report. The LRDP is a land use plan which identifies future proposed development of the UCSB campus and addresses consistency of the development with the Coastal Act. The LRDP covers the proposed project and project site, identifying its anticipated development as "Open Space".

A draft of the IS/MND was made available for public review and comment for a 30-day period from February 26, 2016 to March 28, 2016. UCSB received a public comment letter on the draft IS/MND from the City of Goleta and made minor revisions to the draft IS/MND in response to those comments. The revisions made minor clarifications to proposed mitigation measures related to traffic safety (painting existing curbs red for traffic sight safety) and setback distances for noise-producing equipment to minimize short-term noise impacts. These minor clarifications did not require recirculation of the IS/MND. An additional comment letter was received from a resident near the project site that requested additional information regarding

the project, which was provided. Comments received from the California Department of Fish and Wildlife (CDFW) addressed a variety of issues but primarily pertained to short-term construction-related impacts to common and sensitive species on the project site. The additional information requested by CDFW has been provided or will be included in a project-specific Habitat Restoration and Monitoring Plan, which was described by the IS/MND. Additional comments on the IS/MND were provided by the Santa Barbara Audubon Society. Many of the Audubon Society comments did not address the adequacy of the environmental review included in the IS/MND but suggested possible revisions to the design of the project. None of the comments received from CDFW or the Audubon Society resulted in the identification of new significant environmental impacts or required the adoption of additional mitigation measures. On March 29, 2016, UCSB adopted the IS/MND (Exhibit 4), approved the project, and adopted a Mitigation, Monitoring and Reporting Program ("MMRP") (Exhibit E).

The IS/MND identifies potential effects of the proposed project in the areas of: Aesthetics, Air Quality, Biological Resources, Hazards & Hazardous Materials, Land Use Planning, Noise, Transportation/Traffic, and Utilities and Service Systems. The IS/MND identifies mitigation measures to avoid, reduce or mitigate all of the possible significant environmental effects to less than significant. The project's potentially significant effects and mitigation measures are summarized below and are set forth in the attached IS/MND and Mitigation and Monitoring and Reporting Program.

Aesthetics
The proposed project could result in impacts to scenic trees adjacent to residential neighborhood. Measures to protect trees will be implemented during grading in the vicinity of the trees. Trees that will be removed will be replaced and a tree replacement planting plan will be prepared.

Air Quality
Temporary, localized emissions of particulate matter during construction have the potential to exceed ambient air quality standards and contribute to regional violations of the ambient air quality standards. The Santa Barbara County Air Pollution Control District has a list of construction dust control measures (sweeping, watering, etc.) that will be implemented for all construction phases to reduce these impacts to a less than significant level.

Biological Resources
The proposed project could result in direct and indirect impacts to federal and/or state listed plant and animal species, and could conflict with policies regarding some of these species. Mitigation measures to reduce potential impacts to special status species to less than significant include a tar plant restoration plan, seasonal avoidance, nesting bird surveys, salvage and relocation plan for tidewater goby and red-legged frog, and compliance with applicable regulatory compliance and permit conditions.

The proposed project also has the potential to impact riparian, wetland, and other natural communities during construction. Grading operations will include dewatering, excavation, and

fill of drainage corridors on the project site. Therefore, the short-term temporary construction-related impacts from excavation, fill, and conversion of habitat types would be a potentially significant but mitigable impact. This impact will be reduced to a less than significant level by implementing mitigation measures to comply with federal and state regulations and permit requirements and develop a salvage and relocation plan. These mitigation measures will minimize the potential for construction-related impacts to sensitive wildlife species on the project site, and affirm through the required regulatory compliance process the Project's overall beneficial effect related to increased wetland, aquatic, and tidal habitat functions representative of native habitats present before the golf course and grading eliminated most of these habitat functions.

Hazards & Hazardous Materials

To address the potential project impact of exposing people or structures to wildfire hazard, avoidance of vegetation clearing on the project site during red flag warning periods for the region shall be implemented and a 100-foot wide defensible space shall be established and maintained around the northern and eastern perimeters of the project site.

Land Use Planning

Proposed development projects undertaken at UCSB must be consistent with the requirements of UCSB's 2010 Long Range Development Plan (LRDP). The LRDP is a land use plan which identifies future proposed development of the UCSB campus and addresses consistency of the development with the Coastal Act. The LRDP includes policies and development standards, in the form of avoidance, reduction and mitigation measures, to ensure such consistency. The LRDP, which was approved by the California Coastal Commission in November 2014, identifies the project site as "Open Space" and includes policies that are specifically applicable to the restoration of the project site. The project's consistency with all applicable LRDP policies is detailed in Table 5.10-1 of the IS/MND. The LRDP policies extend to protection of scenic, native and roosting trees, environmentally sensitive habitat areas, special status plant and wildlife species, archeological resources, public access, water quality, and biological resources. With the implementation of mitigation measures identified by the IS/MND, the project will be consistent with all applicable LRDP policies.

A portion of the project site, including Devereux Creek, is within the California Coastal Commission original jurisdiction and thus is not subject to the LRDP policies, but will be permitted in accordance with the Coastal Act and under a separate Coastal Development Permit (CDP). Although not subject to the LRDP requirements, the project activities in this portion of the project site will be undertaken consistent with the policies required by the LRDP and mitigation measures identified in Table 5.10-1 of the IS/MND. These measures, in addition to any additional conditions imposed under the CDP ensure consistency with the Coastal Act. The South Parcel is covered under a permanent conservation easement managed by the Santa Barbara County Land Trust. Since the proposed project will retain the entire project area, including the South Parcel, in open space use, it is consistent with this land use requirement.

Noise
The proposed project could result in noise impacts during the construction period. Construction noise reduction measures will be implemented when earthmoving construction equipment is operating on the project site such as use of noise-reducing equipment when possible, location of stationary sources of noise away from sensitive receptors to the extent possible, and timing of loud construction activities to avoid sensitive periods including evenings, weekends, and finals week.

Transportation/Traffic
The proposed project could result in reduction of sight lines along the driveway entrance to the property on Whittier Road. UCSB will request that the City of Goleta provide approximately 25-feet of red curb on both sides of the project site entrance driveway to provide adequate sight distance along Whittier Drive for vehicles exiting the site. If feasible, curb painting will be installed prior to the public's use of the reconfigured parking lot.

Utilities and Service Systems
Proposed grading and construction operations in the vicinity of the GWSD sewer trunk line easement have the potential to conflict with the operation and maintenance of the sewer line on the northern portion of the project site. Implementation of the following mitigation measure would reduce this impact to a less than significant level. Proposed final grading and construction plans for areas near the GWSD pipeline easement shall be provided to the GWSD for review and approval prior to the start of grading activities on the project site.

All mitigation measures proposed by the MND are contained in the Mitigation Monitoring and Reporting Program for the Project (Exhibit E).

Based on the IS/MND, UCSB determined that the effects of the project will be avoided, reduced or mitigated to less than significant levels with imposition of the identified mitigation measures. OPC staff concurs with this conclusion and, accordingly, recommends that the OPC: (1) find that the project, as mitigated, avoids, reduces, or mitigates the possible effects of the project to a level of insignificance; and (2) find that there is no substantial evidence that the project, as mitigated, may have a significant effect on the environment; and (3) adopts the attached Mitigation, Monitoring, and Reporting Program (Exhibit E).

If the OPC approves the proposed authorization, staff will file a Notice of Determination (attached in draft form as Exhibit F).