

**COMSTOCK HOMES DEVELOPMENT AND
ELLWOOD MESA OPEN SPACE PLAN FEIR**

Table ES-I. Summary of Impacts and Mitigations

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
Class I Impacts				
4.4 Biological Resources	Comstock Homes Development	<p>Impact BIO-3: Monarch Butterflies. Construction of the proposed Comstock Homes Development would place residential development within 350 feet of the “Ellwood North” monarch overwintering site located in the large eucalyptus grove along the eastern property boundary of the Santa Barbara Shores parcel, and within 200 feet of the “Sandpiper Golf Course” autumnal/overwintering site. In addition, residential development would remove approximately 190 of the 450 mature eucalyptus trees that occur along the northern and western boundaries of the project site. Approximately 50 trees proposed for removal are located along the southwestern parcel boundary in the “Sandpiper Golf Course” monarch butterfly autumnal/overwintering site. The “Ellwood North” and the “Sandpiper Golf Course” groves and the portions of the eucalyptus windrow north of the latter site are considered ESHA areas by the City of Goleta. Exposure of the “Ellwood North” and the “Sandpiper Golf Course” groves to increased human activity in and around the groves and air-borne smoke and chemicals from residential emission sources, as well as the altered micro-climate resulting from the loss of most of the southwesterly windrow, could have a significant detrimental affect on these populations.</p>	<p>Mitigation Measure BIO-3: To minimize disturbances to adjacent open space areas, the applicant’s proposed fencing around the perimeter of the Comstock Homes Development site shall include 6-foot-high fencing consisting of a 2.5-foot-high block wall with 3.5 feet of wrought iron (or tubular steel) fencing on top. Temporary construction fencing with chain link or other material satisfactory to the City of Goleta shall be installed to indicate the grading limits of the development footprint.</p> <p>Mitigation Measure BIO-5: All construction, tree removal, or noise-generating work associated with this project shall be seasonally timed to avoid noise- and human activity-related impacts to overwintering monarch butterflies (October-March). However, it is recognized that this may be impractical due to the length of time site preparation and construction activities would be interrupted. If work must occur between October and March, prior to work, a qualified biologist shall survey all eucalyptus trees within 500 feet of the residential development area to determine use by monarchs. If butterfly aggregations are found within 500 feet of the work area, work activities shall be halted until monarchs have left the site.</p> <p>Mitigation Measure BIO-6: The applicant shall contribute funds to a monarch inventory and monitoring program, per the Open Space and Habitat Management Plan. These funds will allow the City of Goleta to properly coordinate management of the existing monarch overwintering sites in the proposed Ellwood Mesa Open Space Plan area by hiring a monarch specialist to coordinate research efforts, evaluate the condition of the population and groves, detect trends in butterfly health, number, and behavior, and support awareness of butterfly migration to</p>	Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			<p>ensure that the existing monarchs aggregations are protected.</p> <p>Mitigation Measure BIO-7: A Fire Protection Program for the eucalyptus groves shall be developed by the applicant and submitted with the Final Development Plan and Tract Map. This program shall address measures within Comstock Homes Development to reduce the risk of fire and increase the potential for control should a fire occur. The program shall also prohibit smoking and motor vehicles and shall include signage stating these restrictions in the Comstock Homes Development access points to the Open Space Plan area.</p> <p>Mitigation Measure BIO-11: The applicant shall prepare and install biological resources protection signage, consistent with the Open Space Plan.</p> <p>Mitigation Measure BIO-12: The eucalyptus woodland ESHA lost as a result of the Comstock Homes Development is unmitigable as loss of an ESHA is inconsistent with the California Coastal Act. Nevertheless, mitigation, such as eucalyptus woodland replacement in common open spaces, could offset some losses.</p> <p>Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area. Monarch butterfly population and habitat management opportunities are identified in the plan.</p>	
4.4 Biological Resources	Comstock Homes Development	Impact BIO-4: Roosting and Foraging Habitat for Raptors, Loggerhead Shrikes, and Bats. Several special-status raptor species routinely use the Comstock Homes Development, Santa Barbara Shores, and Ellwood Mesa parcels. Loggerhead shrikes forage throughout the project area, including the proposed development footprint. Grasslands and woodlands in the area also provide potential foraging habitat for pallid bat, western red bat, Yuma myotis, and Townsend's big-eared bat. The Comstock Homes Development project would reduce	<p>Mitigation Measure BIO-3: Fencing around the perimeter of the Comstock Homes Development site shall include 6-foot-minimum height fencing. Temporary construction fencing with chain link or other material satisfactory to the City of Goleta shall be installed to indicate the grading limits of the development footprint.</p> <p>Mitigation Measure BIO-4: A survey by a City of Goleta-qualified biologist shall be conducted immediately prior to construction in</p>	Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		<p>available roosting and/or foraging habitat for these species in the existing open space area by about 18 acres, or about 15 percent of the total acreage of open space. It also would increase human presence and pet activity, which could disrupt foraging patterns. Night lighting would increase in undeveloped portions of the open space area near residential development, which may be beneficial for bat foraging behavior, but could negatively affect diurnal avian species.</p>	<p>order to establish the current breeding and roosting status of resident raptors throughout the proposed development footprint, as well as the Santa Barbara Shores and Ellwood Mesa parcels. The survey shall include recommendations regarding minimizing impacts during construction, including but not limited to, setbacks, fence protection, restrictions on construction scheduling, etc. The survey shall take into account expected increases and decreases in raptors over the construction period and shall include a map showing known roosting and nesting sites. Consistent with the raptor protection program detailed in the Open Space And Habitat Management Plan, construction shall be timed to avoid the nesting season for raptors. Prior to construction, a qualified biologist will survey for active nests in and around the project area. Construction work within 500 feet of active nest(s) will be suspended until the young have fledged the nest.</p> <p>Mitigation Measure BIO-7: A Fire Protection Program for the eucalyptus groves shall be developed by the applicant and submitted with the Final Development Plan and Tract Map. (For full text see Impact BIO-3 mitigation measures.)</p> <p>Mitigation Measure BIO-8: The applicant shall revise the Comstock Homes Development site plan to reroute the detention basins adjacent to the west bank of Drainage 1A to avoid the native grassland habitat. Native grasslands within the development footprint shall be surveyed and the amount of habitat to be removed shall be determined by measuring the surface area of current native grassland areas for off-site mitigation at a ratio of 3:1. Mitigation shall occur within the closed trails in the Open Space Plan area.</p> <p>Mitigation Measure BIO-11: The applicant shall prepare and install biological resources protection signage, consistent with the Open Space Plan.</p>	

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			<p>Mitigation Measure BIO-12: The Open Space and Habitat Management Plan identifies measures for protection of monarch butterflies and associated habitat, including replacement of eucalyptus trees in common spaces.</p> <p>Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area. Raptor management opportunities are identified in the Open Space Plan.</p>	
4.4 Biological Resources	Comstock Homes Development	<p>Impact BIO-5: Nesting Habitat for Raptors and Loggerhead Shrikes. The project would place residences within 150 to 200 feet of the white-tailed kite nest site observed in the eucalyptus windrow along the western border of the project area in 1997. A pair of Cooper's hawks nested in eucalyptus trees in the same windrow and fledged three young in 1997, and a pair nested at the same location again in 1999. This location is within 100 feet of the proposed development footprint. Raptors typically show high site fidelity for nest sites. Residential development will remove eucalyptus trees from this windrow and may cause this species to abandon the nest site.</p>	<p>Mitigation Measure BIO-3: Fencing around the perimeter of the Comstock Homes Development site shall include 6-foot-minimum height fencing. Temporary construction fencing with chain link or other material satisfactory to the City of Goleta shall be installed to indicate the grading limits of the development footprint.</p> <p>Mitigation Measure BIO-4: A survey by a City of Goleta-qualified biologist shall be conducted immediately prior to construction in order to establish the current breeding and roosting status of resident raptors throughout the proposed development footprint, as well as the Santa Barbara Shores and Ellwood Mesa parcels.</p> <p>Mitigation Measure BIO-7: A Fire Protection Program for the eucalyptus groves shall be developed by the applicant and submitted with the Final Development Plan and Tract Map.</p> <p>Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area. Raptor management opportunities are identified in the Open Space Plan.</p>	Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
4.4 Biological Resources	Comstock Homes Development	Impact BIO-9: Native Grassland. The Comstock Homes Development site would remove 0.416 acre of native grasses as part of the surface disturbance associated with residential development. Removal of more than 0.25 acre of native grassland where the native species comprise at least 10 percent of the total relative ground cover, and which are part of a larger ecosystem, is considered significant impact by the City of Goleta and the CDFG.	<p>Mitigation Measure BIO-8: Native grasslands within the development footprint shall be surveyed and the amount of habitat to be removed shall be determined by measuring the surface area of current native grassland areas for off-site mitigation at a ratio of 3:1.</p> <p>Mitigation Measure BIO-10: In order to protect the genetic integrity of the native plant populations on the undeveloped portions of the subject property, the project Landscape Plan shall be prepared to prohibit the use of non-locally collected native plants and seed materials for any native species used within or adjacent to open space areas (including plantings proposed for habitat/buffer restoration, native grassland mitigation, and landscape plantings outside perimeter fencing). Whenever native species are specified for plantings or seeding, all seed or plant material shall come from sources along the south coast. In some cases, such as for native grassland and wetland buffer species, seed shall be collected from the proposed development area, Santa Barbara Shores, or the Ellwood Mesa Open Space.</p> <p>Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area. Native grassland restoration and enhancement opportunities are identified in the Open Space Plan.</p>	Significant
4.9 Visual Resources	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact VIS-1: KOP Analysis. When the project is viewed from the open space areas south of the project site, the City of Goleta’s visual thresholds would be exceeded because the development would be incompatible in appearance with surrounding open space areas, the Santa Ynez mountain view would be obstructed, and because the Channel Island view from KOP-2(A) would be obstructed. Specifically, visual impacts from the project at KOPs G-2(A), G-6, G-7, and G-8 remain Class I. Only the relocation of the project could reduce visual impacts to a level of insignificance at these KOPs.	<p>Mitigation Measure VIS-1A: Landscape Screening from Surrounding Public Areas. To minimize views of residences in the Comstock Homes Development from surrounding public areas, including the Anza Trail and other trails within the Ellwood Mesa Open Space, and the parking and restroom area east of the Comstock project site, the applicant shall install additional landscape screening to supplement the applicant’s proposed landscape plan as follows:</p> <ul style="list-style-type: none"> • At the rear yard of lots 41-59 and the side yards of lots 74-75, the applicant shall plant screening trees, preferably 	Significant

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Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			<p>California native species which will reach at least 20 feet in height or more at maturity. At least 50% of the trees indicated in the landscape plan should be from containers no smaller than 1 gallon or an equivalent size.</p> <ul style="list-style-type: none"> • Tree plantings shall be interplanted with fast growing native shrub species which will provide early screening and can be removed in four to five years as trees reach a substantial size. Adequate irrigation shall be installed and maintained for a minimum of five years. • The applicant shall prepare CC&Rs for the residential community and make the City a participant, regulating the removal/replacement of the screening trees. The owner/tenant of residences on the lots identified above desiring to remove said trees shall be required to consult with the City and prepare a landscape plan for City approval. <p>Mitigation Measure VIS-1B: Landscape Screening from Sandpiper. To minimize views of residences in the Comstock Homes Development from the Sandpiper Golf Course, the applicant shall install additional landscape screening to supplement the plantings proposed in the applicant's landscape plan as follows:</p> <ul style="list-style-type: none"> • A planting of California native trees and/or dense shrubs which effectively shield the view of the new structures by 80% or more (equivalent to the existing eucalyptus screen) shall be planted as soon as practicable so that the said screening is mature and effective in five years. Selected tree species shall reach at least 20 feet in height. • The applicant shall prepare CC&Rs for the residential community and make the City a participant, regulating the removal/replacement of the screening trees. The owner/tenant of residences on the lots identified above desiring to remove said trees shall be required to consult 	

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			<p>with the City and prepare a landscape plan for City approval.</p> <ul style="list-style-type: none"> • Climbing vines and a planted landscape buffer of tall shrubs shall be planted and maintained along the west side of the privacy wall to soften the appearance of the wall as viewed from Sandpiper Golf Course. <p>Mitigation Measure VIS-1C: To minimize views of residences in the Comstock Homes Development from Hollister Avenue, the applicant shall install additional landscape screening to supplement the plantings proposed in the applicant’s landscape plan as follows:</p> <ul style="list-style-type: none"> • Proposed street tree plantings along Hollister Avenue shall be interplanted with fast growing native shrubs species which will provide early screening and can be removed in four to five years as the larger trees reach a size adequate to provide the screening shown in Photos 1C, 2C, and 3C (Figures 4.9-3 and 4.9-6). <p>Climbing vines and/or tall shrubs shall be planted and maintained along the north side of the privacy wall to soften the appearance of the wall as viewed from Hollister Avenue. Adequate irrigation shall be installed and maintained for a minimum of five years.</p> <p>Mitigation Measure VIS-2: Building Colors. To minimize impacts to visual resources by the Comstock Homes Development the building material colors selected shall be muted tones in substantial conformance with the building character of the photo simulations identified as Photo C for KOPs G-1 through G-9.</p> <p>Mitigation Measure VIS-3: Building Mass. To minimize views of residences in the Comstock Homes Development from surrounding public areas, including the Anza Trail, other trails within the Ellwood Mesa Open Space Plan area, and the parking area east of the Comstock project site, the applicant shall</p>	

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Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			construct single level residences on lots 1, 2, 41-57, 74, 75, 78 as indicated on the site plan reviewed by this EIR. The height of single-level homes shall not exceed 19.5 feet at the roofline.	
4.9 Visual Resources	Comstock Homes Development	<p>Impact VIS-7: Loss of Scenic Coastal Vistas and Open Space. Few undeveloped coastal open space areas that are comparable to the Comstock development site remain on the South Coast. The Santa Barbara Shores parcel is in and of itself a significant coastal resource that has already been dedicated as open space by the City of Goleta.</p> <p>Implementation of the proposed residential project would contribute to the cumulative loss of coastal open space areas and the associated visual resources. Although implementation of the mitigation measures described in this section would serve to reduce visual impacts, the project would contribute to the cumulative loss of unspoiled coastal visual resources.</p>	<p>Mitigation Measure VIS-1A: Landscape Screening from Surrounding Public Areas. (For full text of Mitigation Measure VIS-1A, see above.)</p> <p>Mitigation Measure VIS-1B: Landscape Screening from Sandpiper Golf Course. (For full text of Mitigation Measure VIS-B, see above.)</p> <p>Mitigation Measure VIS-1C: Landscape Screening from Hollister Avenue. (For full text of Mitigation Measure VIS-C, see Page above.)</p> <p>Mitigation Measure VIS-2: Building Colors. (For full text of Mitigation Measure VIS-2, see above.)</p> <p>Mitigation Measure VIS-3: Building Mass. (For full text of Mitigation Measure VIS-3, see above.)</p>	Significant
4.10 Recreation	Comstock Homes Development	<p>Impact REC-3: Residential Rezone and Development. The project would rezone the 36-acre northwestern portion of the existing Santa Barbara Shores park and convert the site to residential use, thus displacing approximately 0.87 miles of existing undeveloped trails, and displace the existing 15-space off-street parking area and informal on-street parking. The Comstock Homes Development would significantly alter the character of this trailhead area by adding substantial urban development and reducing the public access from Hollister Avenue.</p>	<p>Mitigation Measure REC-1: An agreement shall be provided for dedication in perpetuity of the public access easements through the subdivision. Information regarding public access easements shall be included in the CC&Rs for the subdivision. Public access signage shall be installed at the Hollister Avenue frontage and at other appropriate locations within the subdivision and on the perimeter of the open space lands.</p> <p>Mitigation Measure REC-2: The Comstock Homes applicant shall contribute funds to the City of Goleta for construction of the public parking improvements at Hollister Avenue in the Open Space Plan area. The funding amount shall be determined in consultation with the City of Goleta and shall at a minimum be sufficient to replace the present day off-street 15-space parking</p>	Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			<p>capacity as well as any existing on-street parking capacity that would be displaced by the development.</p> <p>The Comstock Homes applicant shall also provide funds for trail improvements, habitat restoration, and other improvements in the Ellwood Mesa Open Space Plan area. The funding amount shall be determined in consultation with the City of Goleta and shall at a minimum be sufficient to construct and maintain trails equivalent in length to the present day trails within the 36-acre residential parcel that would be displaced by the development.</p>	
4.10 Recreation	Ellwood Mesa Open Space Plan	<p>Impact REC-5: Open Space Plan Trail Closures. The proposed trail closures and other efforts to formalize the trail system and other potential changes to the rural character of the existing recreational resource is potentially significant. Implementation of the Open Space Plan could result in closure of an estimated 5.44 miles (or 37%) of the estimated 14.73 miles of existing footpaths within the City of Goleta’s Ellwood Mesa Open Space Plan area. This would be in addition to the loss of 0.87 miles of trails from the Comstock development. As public use of the area gradually increases over time, particularly with the addition of the Comstock Homes residences directly adjacent to the open space, the remaining trails could experience crowding, thus further diminishing the open and unrestricted experience that exists today.</p>	<p>Mitigation Measure REC-3: Trail closures shall be limited to the extent feasible without substantially compromising the habitat restoration, resource protection, and public safety goals of the Open Space Plan. Prior to closing a trail or trail segment, additional site investigations shall be conducted, as appropriate, to document the prevailing recreational uses of the trail (number and types of users over multiple seasons) at the time of the proposed closure.</p>	Significant
4.10 Recreation	Ellwood Mesa Open Space Plan	<p>Impact REC-6: Open Space Plan Trail User Restrictions. In addition to eliminating approximately one third of the existing trails, certain user groups would be restricted to a subset of the remaining trails. Plan implementation would allow pedestrian access on all open trails, but would limit the trails available to bicyclists and equestrians. Equestrian trails would be limited to a single loop trail on the Ellwood Mesa, a total of 1.46 miles, or 10% of the existing Ellwood Mesa trails. Further, equestrian beach access would be prohibited on the three existing Ellwood Mesa coastal access points, and restricted to a single point at existing Access “D” located on the University’s adjacent property to the east. Parking for horse trailers</p>	<p>Mitigation Measure REC-3: Trail closures shall be limited to the extent feasible without substantially compromising the habitat restoration, resource protection, and public safety goals of the Open Space Plan.</p>	Significant

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Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		<p>(estimated at six or more informal spaces along Hollister Avenue) would be reduced to three designated spaces within the proposed public parking at the Santa Barbara Shores parking area. On-street trailer parking would likely not be practical at the Hollister Avenue frontage due to the residential development frontage improvements.</p> <p>Bicyclists would be restricted to an estimated 5.22 miles, or 35%, of the existing Ellwood Mesa trails that are presently unrestricted (with the exception of the Ellwood Main Monarch Grove trails). Bicyclists would generally be restricted to the open grassland area of the Ellwood Mesa, and would be required to walk their bicycles in the eucalyptus woodlands, riparian areas, and coastal bluff trails.</p> <p>Members of the public expressed concern about the potential crowding effect that would result from trail restrictions. This crowding effect, whether real or perceived, would be viewed by many present day users as a diminution of the semi-wild character of the area, in comparison to trail use patterns that have been enjoyed over many years.</p>		
4.10 Recreation	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact REC-8 (Cumulative Impacts): Cumulative Increase in Open Space Usage. The proposed Comstock project, in combination with other proposed projects and a general increase in population and use intensity in the Open Space Plan area, would cumulatively add to a long-term trend of increased public use, access or activities in the Open Space Plan area. This increase in public use, access, and activity could result in further restrictions on recreational use of the area and overall deterioration of the recreational resources.	Mitigation Measure REC-2: Refer to Mitigation Measure REC-2 summary provided above. Mitigation Measure REC-3: Trail closures shall be limited to the extent feasible without substantially compromising the habitat restoration, resource protection, and public safety goals of the Open Space Plan.	Significant
4.12 Traffic and Circulation	Comstock Homes Development/ Ellwood Mesa	Impact Traffic-2: The Comstock Homes Development would generate 79 P.M. Peak Hour Trips (PHT) at the study-area intersections, resulting in a significant project impact at the Hollister Avenue/Storke Road intersection. Levels of service	Mitigation Measure Traffic-1: The impact analysis determined that the Comstock Homes Development would generate a project-specific impact at the Storke Road/Hollister Avenue intersection. The intersection currently operates at LOS D and the project would	Significant

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Table ES-I. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
	Open Space Plan	were calculated for the study-area intersections assuming the existing + project P.M. PHT forecasts. The data indicate that the project would generate project-specific impacts at the Storke Road/Hollister Avenue intersection.	<p>exceed the City's traffic impact threshold of 15 P.M. PHT. The applicant shall implement one of the following improvements at the Storke/Hollister intersection.</p> <p>Mitigation Traffic-1a. One of the operational constraints at the Storke Road/Hollister Avenue intersection is the lack of a westbound merge lane for the heavy right-turn movement from southbound Storke Road onto westbound Hollister Avenue. Vehicles traveling southbound on Storke Road turning right onto Hollister Avenue are at times delayed at the yield sign waiting for gaps in the westbound traffic stream on Hollister Avenue. These vehicles form queues that back-up onto Storke Road and affect the southbound through movements at the traffic signal. Providing a merge lane in front of the service station on this corner of the intersection would allow the vehicles to turn onto Hollister Avenue without being delayed by the through traffic. With this improvement in place, the intersection would operate at LOS C-D (V/C 0.805) with existing + project volumes. This improvement would off-set the project's traffic addition and thus mitigate the impacts of the project.</p> <p>Mitigation Traffic-1b. The GTIP includes an improvement for the intersection which involves adding a third eastbound left-turn lane. The GTIP improvement would also require adding a third lane on Storke Road northbound from Hollister Avenue to the U.S. 101 southbound ramp intersection. There are currently two northbound lanes on Storke Road and the third lane would be required to accept the traffic from the three eastbound left-turn lanes on Hollister Avenue. Implementation of the third left-turn lane would also require widening of Hollister Avenue adjacent to the Camino Real Marketplace site, which may require additional right-of-way from adjacent properties. The intersection's operation would be improved to LOS C (V/C 0.77) with this improvement.</p> <p>Mitigation Traffic-1c. The previous GTIP (1997 version) included a</p>	

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Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			<p>project to add a third westbound through lane at the Storke Road/Hollister Avenue intersection. This mitigation would improve the intersection's operation to LOS C (V/C 0.78). The third westbound through lane option at the intersection would require acquisition of right-of-way from developed properties on the north side of Hollister Avenue west of Storke Road (from a gas station and a recently constructed office building), as well as right-of-way from a vacant parcel located east of the intersection.</p> <p>Mitigation Traffic-1d. The applicant shall post a performance security (or utilize another mechanism acceptable to the City of Goleta) and enter into an agreement with the City of Goleta for: a) the implementation of one or more of Mitigations Traffic 1-a, 1-b, or 1-c; and/or b) the analysis of improvement alternatives, engineered design of approved improvement alternatives, and/or construction of approved improvement alternatives. The applicant's financial obligation under this requirement shall not exceed \$1 million.</p>	
4.12 Traffic and Circulation	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact Traffic-6. The Storke Road/Hollister Avenue intersection is forecast to operate at LOS E under cumulative + project conditions without the Phelps Road extension. The project would add 0.01 to the V/C ratio, resulting in a cumulatively significant impact.	Mitigation Measure Traffic-1. The impact analysis determined that the Comstock Homes Development would generate a project-specific impact at the Storke Road/Hollister Avenue intersection. The applicant shall implement one of three specific mitigation measures, as described in Impact Traffic-2 above.	Significant
4.13 Noise	Comstock Homes Development	Impact N-2: Construction Noise. Short-term noise levels from grading and construction activities within the Comstock Homes Development could reach maximum values of over 80 dBA near the Ellwood School, and 72 dBA at the residences to the east in Santa Barbara Shores. Park users and golfers at the Sandpiper Golf Course to the west could experience short peak noise levels up to 90 dBA. This impact could occur intermittently for up to 6 to 8 weeks during grading activities.	Mitigation Measure N-2: Construction activity for site preparation and for future development shall be limited to the hours between 7:00 a.m. and 4:00 p.m., Monday through Friday. No construction shall occur on State holidays (e.g. Thanksgiving, Labor Day). Construction equipment maintenance shall be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions. Mitigation Measure N-4: Stationary construction equipment that generates noise in excess of 65 dBA at the project boundaries shall be shielded and located as far towards the interior of the construction site as practical to minimize the noise levels at the	Significant

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			residences to the east, the Ellwood Elementary School to the northeast, and the golf course to the west.	
4.13 Noise	Ellwood Mesa Open Space Plan	Impact N-3: Construction Noise. Short-term noise levels from grading and construction activities for the new parking and restroom facilities south of Hollister Avenue and east of the proposed Comstock Homes Development could reach maximum values of 80 dBA at the Ellwood School and at the residences to the east. Open Space visitors in the area during construction may also be exposed to construction noise up to 90 dBA in the immediate vicinity of construction equipment.	<p>Mitigation Measure N-2: Construction activity for site preparation and for future development shall be limited to the hours between 7:00 a.m. and 4:00 p.m., Monday through Friday.</p> <p>Mitigation Measure N-3: Additional Limitation of Construction Timing for Open Space Parking Area. To the extent feasible to meet project schedule, construction within the open space parking area shall be restricted to days when school is not in session at the Ellwood Elementary School (e.g., during summer vacation or winter or spring break).</p> <p>Mitigation Measure N-4: Stationary construction equipment that generates noise in excess of 65 dBA at the project boundaries shall be shielded and located as far towards the interior of the construction site as practical to minimize the noise levels at the residences to the east and the golf course to the west.</p>	Significant
4.14 Air Quality	Comstock Homes Development	Impact AQ-3: Residential Emissions. Operations of the project would produce significant ROG emissions from all combined residential project sources, including vehicular traffic, wood burning fireplaces, space heating, water heating, and consumer products. The project would also generate vehicle emissions mainly due to commuting activities. During winter days, the main sources of project emissions would be wood-burning fireplaces/stoves. Elimination of the wood-burning fireplaces/stoves or conversion of the fireplaces/stoves to natural gas burning design would substantially reduce the project ROG emissions. The estimated project operational air pollutant emissions after elimination of wood-burning fireplaces/stoves would reduce ROG emissions to below the City daily emission significance threshold. However, wood-burning fireplaces/stoves are currently part of the project description.	<p>Mitigation Measure AQ-2: The applicant shall submit a record of contact with the Metropolitan Transit District (MTD) to determine if additional bus service and/or bus stops adjacent to the project site would increase the ability of project residences to use the MTD bus system. The applicant shall also include in the project design appropriate measures, such as but not limited to, installation of a designated message board facility to be used for posting of MTD bus route schedules and rideshare information in a central location onsite.</p> <p>Mitigation Measure AQ-3: The applicant shall incorporate energy conservation measures into project building plans unless the applicant proves that incorporation of a specific measure is infeasible.</p> <p>Mitigation Measure AQ-4: To reduce significant daily ROG, NO_x,</p>	Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			and PM ₁₀ emissions during winter days from combined project sources, only natural gas fireplaces shall be allowed.	
4.14 Air Quality	Comstock Homes Development/ Ellwood Mesa Open Space Plan	<p>Impact AQ-9: Residential Emissions. Emissions of ROG from project operations would result in significant and unavoidable contributions to cumulative air quality impacts in the South Central Coast Air Basin. Regional emissions would increase as a result of the proposed project.</p> <p>While NO_x emissions resulting from the project-generated vehicular traffic and non-vehicular operational aspects are below significance thresholds as discussed under Impact AQ-3, ROG emissions exceed the City's 25 pounds per day significance threshold. While proposed mitigation measures to prohibit wood-burning stoves have been included, it is unclear if this measure would be incorporated in the project description.</p>	<p>Mitigation Measure AQ-2: The applicant shall submit a record of contact with the Metropolitan Transit District (MTD) to determine if additional bus service and/or bus stops adjacent to the project site would increase the ability of project residences to use the MTD bus system (see above for summary text).</p> <p>Mitigation Measure AQ-3: The applicant shall incorporate energy conservation measures into project building plans unless the applicant proves that incorporation of a specific measure is infeasible.</p> <p>Mitigation Measure AQ-4: To reduce significant daily ROG, NO_x, and PM₁₀ emissions during winter days from combined project sources, only natural gas fireplaces shall be allowed.</p>	Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
Class II Impacts				
4.2 Geology and Geologic Hazards	Comstock Homes Development	Impact GEO-1: Change in Topography. Project grading during construction would result in substantial changes in topography. The proposed project would require removal of the upper 3 to 4 feet of soils in proposed building areas, but should not create unstable slopes. The most significant change in topography would occur on the southern portion of the property, where up to 6 feet of fill will be placed to infill a shallow gully for a proposed road.	Mitigation Measure GEO-1: A Final Grading Plan shall be prepared and implemented. Grading shall be supervised by a qualified geotechnical engineer. Mitigation Measure GEO-2: Grading and drainage plans shall be designed to minimize erosion.	Less than Significant
4.2 Geology and Geologic Hazards	Comstock Homes Development	Impact GEO-2: Erosion. Project grading during construction would potentially cause substantially increased erosion and sedimentation, including siltation in Devereux Creek.	Mitigation Measure GEO-1: A Final Grading Plan shall be prepared and implemented. Grading shall be supervised by a qualified geotechnical engineer. Mitigation Measure GEO-2: Grading and drainage plans shall be designed to minimize erosion.	Less than Significant
4.2 Geology and Geologic Hazards	Comstock Homes Development	Impact GEO-4: Seismic Hazards. An earthquake on a nearby fault could result in significant ground shaking and possibly ground rupture at the project site.	Mitigation Measure GEO-3: A 50-foot building setback on either side of the More Ranch fault will be maintained. Mitigation Measure GEO-4: Building & Safety shall approve plans for CBC Seismic Zone consistency.	Less than Significant
4.2 Geology and Geologic Hazards	Comstock Homes Development	Impact GEO-5: Expansive Soils. Surficial soils encountered within the depths affected by proposed grading include slightly expansive soils. Soils with expansion potential contain clay minerals that expand when wet and shrink when dry. Repeated shrinking and swelling of the soil can result in damage to foundations, fill slopes, utilities, and other associated facilities.	Mitigation Measure GEO-1: A Final Grading Plan shall be prepared and implemented. Grading shall be supervised. Mitigation Measure GEO-2: Grading and drainage plans shall be designed to minimize erosion.	Less than Significant
4.2 Geology and Geologic Hazards	Comstock Homes Development	Impact GEO-6: Collapsible Soils. The surface soils are dry and porous to depths of 36 to 48 inches below existing grade, and are susceptible to collapse, compression, and settlement with increasing moisture content. Potential impacts associated with compressible and collapsible soils such as foundation settling are significant but feasibly mitigated.	Mitigation Measure GEO-1: A Final Grading Plan shall be prepared and implemented. Grading shall be supervised. Mitigation Measure GEO-2: Grading and drainage plans shall be designed to minimize erosion.	Less than Significant
4.2 Geology and Geologic Hazards	Ellwood Mesa Open Space Plan	Impact GEO-7: Change in Topography. Project grading during trail construction would result in minor changes in topography. The grading required to construct the Anza Trail, Santa	Mitigation Measure GEO-1: A Final Grading Plan shall be prepared and implemented. Grading shall be supervised. Mitigation Measure GEO-6: Natural sea cliff erosion and retreat	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
Geologic Hazards		Barbara Shores parking area, bluff trail, and infilling of erosional gullies is relatively minor but needs to be conducted according to standards and ordinances to prevent impacts.	shall be monitored every 10 years and after every El Nino winter. The City of Goleta shall intervene and manage the relocation of the Coastal Trail if unsafe conditions exist along the bluffs as the result of landslides, erosion, and cliff retreat.	
4.2 Geology and Geologic Hazards	Ellwood Mesa Open Space Plan	Impact GEO-8: Erosion. Project grading during construction of the Open Space parking lot would potentially cause substantially increased erosion and sedimentation into Devereux Creek.	Mitigation Measure GEO-1: A Final Grading Plan shall be prepared and implemented. Grading shall be supervised. Mitigation Measure GEO-2: Grading and drainage plans shall be designed to minimize erosion.	Less than Significant
4.2 Geology and Geologic Hazards	Ellwood Mesa Open Space Plan	Impact GEO-9: Slope Stability. The Open Space Plan improvements could potentially result in unstable slopes. Preliminary grading plans will need to delineate existing and proposed final grade elevations and proposed drainage features.	Mitigation Measure GEO-1: A Final Grading Plan shall be prepared and implemented. Grading shall be supervised. Mitigation Measure GEO-6: Natural sea cliff erosion and retreat shall be monitored every 10 years and after every El Nino winter. The City of Goleta shall intervene and manage the relocation of the Coastal Trail if unsafe conditions exist along the bluffs as the result of landslides, erosion, and cliff retreat.	Less than Significant
4.2 Geology and Geologic Hazards	Ellwood Mesa Open Space Plan	Impact GEO-10: Seismic Hazards. An earthquake on a nearby fault could result in significant ground shaking and possibly ground rupture at the project site. Open Space Plan structures that could be affected include trail surfaces, boardwalks, bridges, stairs, parking, and restrooms.	Mitigation Measure GEO-3: A 50-foot building setback on either side of the More Ranch fault will be maintained. Mitigation Measure GEO-5: Open Space Plan improvements that require a foundation shall be made according to plans that specify earthquake standards for CBC Seismic Zone 4 and that the site is within 1 km of Type B fault.	Less than Significant
4.2 Geology and Geologic Hazards	Ellwood Mesa Open Space Plan	Impact GEO-11: Expansive Soils. Surficial soils encountered within the depths affected by proposed grading for the new road, parking lot and restroom at Santa Barbara Shores may include slightly expansive soils. Soils with expansion potential contain clay minerals that expand when wet and shrink when dry. Repeated shrinking and swelling of the soil can result in damage to foundations, roads, utilities, and other associated facilities.	Mitigation Measure GEO-1: A Final Grading Plan shall be prepared and implemented. Grading shall be supervised. Mitigation Measure GEO-2: Grading and drainage plans shall be designed to minimize erosion.	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
4.2 Geology and Geologic Hazards	Ellwood Mesa Open Space Plan	Impact GEO-12: Collapsible Soils. Test results from borings collected from the Comstock Homes Project immediately to the west of the proposed new parking lot and restroom at Santa Barbara Shores indicate that surface soils are dry and porous to depths of 36 to 48 inches below existing grade, and are susceptible to collapse, compression, and settlement with increasing moisture content.	Mitigation Measure GEO-1: A Final Grading Plan shall be prepared and implemented. Grading shall be supervised. Mitigation Measure GEO-2: Grading and drainage plans shall be designed to minimize erosion.	Less than Significant
4.2 Geology and Geologic Hazards	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact GEO-13 (Cumulative Impacts): The project's contribution to cumulative impacts, such as increased erosion and sedimentation, would be potentially significant, but feasibly mitigated.	Mitigation Measure GEO-1: A Final Grading Plan shall be prepared and implemented. Grading shall be supervised. Mitigation Measure GEO-2: Grading and drainage plans shall be designed to minimize erosion. Mitigation Measure GEO-6: Natural sea cliff erosion and retreat shall be monitored every 10 years and after every El Nino winter. The City of Goleta shall intervene and manage the relocation of the Coastal Trail if unsafe conditions exist along the bluffs as the result of landslides, erosion, and cliff retreat.	Less than Significant
4.3 Hydrology and Water Quality	Comstock Homes Development	Impact H/WQ-1: Onsite and Downstream Flooding. The proposed Comstock Homes Development would result in permanent changes to topography and potential changes in hydrology of the area due to the creation of additional impervious ground coverage that would substantially reduce the ability of the site to absorb surface water runoff.	Mitigation Measure H/WQ-1: Outlet pipes, velocity reduction structures (e.g., rip-rap) and detention basins/bioswales shall be designed, constructed, inspected, and maintained at the Comstock Homes Development Site to reduce off-site runoff velocities and to prevent off-site flooding and long-term erosion induced sedimentation in Devereux Creek and Slough. Detention basins/bioswales shall be constructed during initial site grading and shall be functional during the construction phase. Detention basins/bioswales shall be maintained frequently throughout the construction phase to remove accumulated sediment. These features shall be depicted on grading and drainage plans. Mitigation Measure H/WQ-2: To reduce runoff from impervious areas and allow for infiltration at the Comstock Homes Development site to the maximum extent feasible, pervious materials or surfaces (e.g., porous pavement or unit pavers on sand) shall be incorporated into the project design in key areas,	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			<p>such as adjacent to concrete walkways and road surfaces for the Comstock Homes Development. The City of Goleta shall incorporate similar measures for the Open Space parking and restroom area, and at trail improvement sites.</p> <p>Mitigation Measure H/WQ-5: The drainage plan for the Comstock Homes Development shall include permanent detention basins/bioswales designed to retain runoff and maintain pre-development runoff rates associated with a 25-year storm event. The bioswale shall be designed to ensure that the retention time of water and the plants selected are adequate to reduce the concentrations of target pollutants. Where feasible, local plant sources (i.e. collected from the watershed or propagated cuttings or seed collected from the watershed) shall be used. The detention basins shall be placed immediately upstream of stormwater pollution source reduction and biological treatment systems, such as oil-water separators and bioswales. The plan shall include specifications for the bioswales to be maintained in working order, and shall assign enforceable responsibility for long-term inspection and maintenance.</p>	
4.3 Hydrology and Water Quality	Comstock Homes Development	Impact H/WQ-2: Erosion and Sedimentation from Residential Development. Increased runoff could result in increased long-term erosion and sedimentation, and therefore decreased water quality in Devereux Creek and Devereux Slough. The majority of the project runoff is proposed to flow to Devereux Creek at several locations in the southern portion of the site. The runoff would be conveyed to the creek via overland flow from two biofilter/detention basins and/or storm drains that would flow directly to tributaries of Devereux Creek. Additional runoff would be directed toward Hollister Avenue via overland flow on the northern perimeter of the developed area.	<p>Mitigation Measure H/WQ-1: Refer to Mitigation Measure H/WQ-2 summary provided above.</p> <p>Mitigation Measure H/WQ-2: Refer to Mitigation Measure H/WQ-2 summary provided above.</p> <p>Mitigation Measure H/WQ-5: Refer to Mitigation Measure H/WQ-5 summary provided above.</p>	Less than Significant
4.3 Hydrology and Water	Comstock Homes Development	Impact H/WQ-3: Pollutants in Runoff from the Residential Development. Pollution from vehicles, roadways, and parking areas, as well as from landscape and household chemicals,	Mitigation Measure H/WQ-1: Refer to Mitigation Measure H/WQ-1 summary provided above.	Less than Significant

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Table ES-I. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
Quality		during construction and post-construction, could be carried in surface runoff into Devereux Creek, thereby degrading the quality of waters contributing to Devereux Slough from this portion of its watershed. Devereux Slough and its watershed have been extensively altered over the past century by urban and recreational development. The proposed biofilter/detention basins are designed to capture the majority of project runoff and allow for filtering prior to release in the watershed. However, some homes drain directly to tributaries of Devereux Creek, leading to potential water quality impacts.	<p>Mitigation Measure H/WQ-2: Refer to Mitigation Measure H/WQ-2 summary provided above.</p> <p>Mitigation Measure H/WQ-5: Refer to Mitigation Measure H/WQ-5 summary provided above.</p> <p>Mitigation Measure H/WQ-6: The applicant shall submit a copy of the Notice of Intent to obtain coverage under the Construction General Permit of the National Pollutant Discharge Elimination System issued by the California Regional Water Quality Control Board.</p> <p>Mitigation Measure H/WQ-8: The drainage plan for the Comstock Homes Development shall provide for treatment of all polluted run-off (e.g., from streets and driveways). The plan shall include specifications for the drains and treatment/filtration systems to be maintained in working order and shall assign enforceable responsibility for long-term inspection and maintenance.</p> <p>Mitigation Measure H/WQ-10: A Pesticide, Herbicide, and Fertilizer Maintenance Plan shall be prepared that minimizes the use of these materials in common areas and private landscape areas, particularly during the rainy season. Biodegradable pesticides and herbicides shall be maximized. Grasses not generally susceptible to pest disease shall be planted in the common area turf areas.</p>	
4.3 Hydrology and Water Quality	Phelps Ditch Trail	Impact H/WQ-5: Trail Construction at Phelps Ditch. The Open Space Plan provides for continued maintenance of public access and possible future recreational trail improvements on the existing flood control road easement located on the west side of Phelps Ditch. If future trail improvements are implemented in this area, then construction of those improvements adjacent to the creek could result in discharges of solid or liquid wastes and/or sediment into the creek.	<p>Mitigation Measure H/WQ-2: Refer to Mitigation Measure H/WQ-2 summary provided above.</p> <p>Mitigation Measure H/WQ-11: If trail improvements are constructed at the Phelps Ditch Trail site, or if boardwalks, stairs, or other public access improvements are constructed in or across Devereux Creek, these improvements shall be constructed during the dry season. Construction methods shall</p>	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		Pending detailed design of trail improvements near Phelps Ditch, the potential exists for water quality impacts associated with trail construction, use, and maintenance.	include appropriate Best Management Practices to prevent construction equipment leaks or spills from entering Devereux Creek and Phelps Ditch. Structures shall not use chemically treated materials that could leach into water. Trails and structures shall be periodically inspected during the wet season to ensure structural integrity and avoidance of flood hazards or obstructions. Maintenance and repairs shall be performed as needed.	
4.3 Hydrology and Water Quality	Ellwood Mesa Open Space Plan	Impact H/WQ-6: Flooding from the Open Space Plan Area. The proposed Open Space parking area would encompass approximately one-half acre of gently sloping undeveloped land located immediately south of Hollister Avenue, between the proposed Comstock Homes Development site and the eastern eucalyptus grove. The parking lot surface would likely be constructed with a pervious concrete, dyed to match the buff color of the native soil. Depending on the design and performance of the actual ground surface materials selected for this area, the parking area could reduce the ground surface area capable of absorbing rainfall and therefore increase stormwater runoff across the site and into site drainages. Flooding potential could be increased due to the proposed parking area if impervious surfaces are used. The increased runoff could result in greater risks of flooding if proposed site drainages, including Devereux Creek, were not capable of handling the flow.	Mitigation Measure H/WQ-2: Refer to Mitigation Measure H/WQ-2 summary provided above. Mitigation Measure H/WQ-4. All new structures (e.g., bridges) in Devereux Creek and its tributaries shall be designed, inspected, and maintained to minimize obstruction and collection of debris that could impede flows and result in localized flooding.	Less than Significant
4.3 Hydrology and Water Quality	Ellwood Mesa Open Space Plan	Impact H/WQ-7: Erosion and Sedimentation from the Open Space Parking Area. Increased runoff from the Open-Space parking area could potentially result in increased long-term erosion and sedimentation, and therefore decreased water quality in Devereux Creek.	Mitigation Measure H/WQ-2: Refer to Mitigation Measure H/WQ-2 summary provided above. Mitigation H/WQ-7. The Open Space parking area shall be designed to minimize degradation of storm water quality. A site-specific Erosion and Sediment Control Plan shall be developed for the parking area. The Plan shall incorporate appropriate BMPs such as oil/water separators, sand filters, landscaped areas for infiltration, basins, or other equivalent BMPs designed to intercept and effectively prohibit pollutants from discharging to	Less than Significant

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Table ES-I. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			onsite drainages. The BMPs selected shall be maintained in working order. The Plan shall included long-term maintenance plans. The location and type of BMPs shall be shown on all site, building and grading plans.	
4.3 Hydrology and Water Quality	Ellwood Mesa Open Space Plan	Impact H/WQ-8: Trail Construction, Well Abandonment, and Remediation. Trail construction, well re-abandonment, and site remediation activities could result in short-term water quality impacts. Pollution from construction vehicles and activities could be carried in surface runoff into Devereux Creek, thereby degrading the quality of waters contributing to the Devereux Slough from this portion of the watershed. Some common sources of construction site pollution include spilled oil, fuel, and fluids from vehicles and heavy equipment; construction debris; sediment created by erosion; irrigation runoff containing pesticides or weed killers; and materials such as used motor oil, antifreeze, and paint products. In addition to these pollutants, the potential well re-abandonment and soil remediation activities could result in runoff from contaminated soils reaching Devereux Creek.	Mitigation Measure H/WQ-4: All new structures (e.g., bridges) in Devereux Creek and its tributaries shall be designed, inspected, and maintained to minimize obstruction and collection of debris that could impede flows and result in localized flooding, consistent with recommendations of the Open Space Plan. Mitigation Measure H/WQ-11. Refer to Mitigation Measure H/WQ-11 summary provided above.	Less than Significant
4.3 Hydrology and Water Quality	Ellwood Mesa Open Space Plan	Impact H/WQ-9: Flood Impacts from Devereux Creek Bridge and Boardwalk Scenario. If the optional Devereux Creek bridge and boardwalk scenario is pursued, then those structures would need to be designed so as to avoid creating on obstruction to flood waters in Devereux Creek. Design details will only be developed at the time that the creek crossing scenario is pursued. Therefore, pending design details, the potential exists that the optional trail improvements could – if not properly designed, sited, and maintained – result in long-term flood hazards.	Mitigation Measure H/WQ-4: All new structures (e.g., bridges) in Devereux Creek and its tributaries shall be designed, inspected, and maintained to minimize obstruction and collection of debris that could impede flows and result in localized flooding, consistent with recommendations of the Open Space Plan	Less than Significant
4.3 Hydrology and Water Quality	Ellwood Mesa Open Space Plan	Impact H/WQ-10: Pollutants from Devereux Creek Bridge and Boardwalk Scenario. If these structures were built, then there would be the potential for short-term construction impacts to water quality, and long-term impacts to flooding. Short-term	Mitigation Measure H/WQ-4: All new structures (e.g., bridges) in Devereux Creek and its tributaries shall be designed, inspected, and maintained to minimize obstruction and collection of debris that could impede flows and result in localized flooding,	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		impacts could include trail erosion and sedimentation to Devereux Creek resulting from vehicle access and earthwork activities in the creek itself and on the slopes of Devereux Creek. Fuel spills or other material leaks from vehicles or equipment could potentially reach Devereux Creek if not properly prevented or controlled.	consistent with recommendations of the Open Space Plan. Mitigation Measure H/WQ-11: Refer to Mitigation Measure H/WQ-11 summary provided above.	
4.3 Hydrology and Water Quality	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact H/WQ-11 (Cumulative Impacts): Cumulative Pollutant Loading from Use of Open Space Area. Pollution from trash and domestic animal waste, including dogs and horses, could be carried in surface runoff into Devereux Creek, thereby degrading the quality of waters contributing to the Devereux Slough from this portion of its watershed. Increased public use of the Open Space Plan area could result in adverse impacts to water quality, such as through introduction of domestic animal wastes and associated increases in nutrient loading and/or bacterial pathogens. The Open Space Plan provides for long-term monitoring and maintenance of the open space lands and watercourses.	Mitigation Measure H/WQ-9: Animal waste minimization measures (e.g., mutt-mitt dispensers) shall be implemented in the vicinity of Devereux Creek, consistent with the Ellwood Mesa Open Space Plan recommendations. Mutt-mitt dispensers shall be installed and maintained by the Comstock Homes Development at appropriate Open Space access points within the Comstock Homes Development, and installed and maintained by the City of Goleta at public trailheads. Educational displays/signs shall be installed which provide information about water quality in the Devereux Creek watershed, and appropriate educational materials shall be incorporated into the Homeowners' Association literature. The displays shall include information pertaining to animal waste and surface water pollution prevention.	Less than Significant
4.3 Hydrology and Water Quality	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact H/WQ-12 (Cumulative Impacts): Cumulative Pollutant Loading from the Residential Development. Two bioswales are proposed to be constructed as part of the Comstock Homes Development. This design feature is intended to prevent the potential for polluted runoff to enter the watershed, and thus the project, as designed, would not contribute to the cumulative pollutant runoff and resulting surface water impacts on Devereux Creek and Slough. However, if not properly designed, installed, and maintained, these bioswales have the potential to allow the project to directly contribute to erosion-inducing siltation of surface waters and runoff of pollutants as a result of increased impervious surfaces, pesticide and herbicide use, and oil and grease residues from the proposed project. This direct contribution of pollutants in an already degraded watershed could result in cumulative impacts to water quality	Mitigation Measure H/WQ-1: Refer to Mitigation Measure H/WQ-1 summary provided above. Mitigation Measure H/WQ-2: Refer to Mitigation Measure H/WQ-2 summary provided above. Mitigation Measure H/WQ-5: Refer to Mitigation Measure H/WQ-5 summary provided above.	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		in the Devereux Creek and Slough.		
4.3 Hydrology and Water Quality	Comstock Homes Development	Impact H/WQ-13 (Cumulative Impacts): Cumulative Flooding from the Residential Development. Increased stormwater runoff as a result of the project's increased impervious surfaces together with potential increased runoff from other future developments in the watershed could exacerbate existing flood hazards downstream from the development site. Two detention basins are proposed to be constructed as part of the Comstock Homes Development. Together with the overall drainage design, the detention basins are intended to reduce flood runoff rates and volumes to levels that approximate the present pre-development rate and volume of runoff. Thus the project, as designed, is not expected to contribute to cumulative flooding impacts on Devereux Creek and Slough.	Mitigation Measure H/WQ-1: Refer to Mitigation Measure H/WQ-1 summary provided above. Mitigation Measure H/WQ-2: Refer to Mitigation Measure H/WQ-2 summary provided above. Mitigation Measure H/WQ-5: Refer to Mitigation Measure H/WQ-5 summary provided above.	Less than Significant
4.4 Biological Resources	Comstock Homes Development	Impact BIO-1: (Southern Tarplant) - Construction of the Comstock Homes Development could result in the loss of southern tarplant, a CNPS IB plant.	Mitigation Measure BIO-1: A qualified biologist shall conduct field surveys during the spring flowering season as well as prior to construction to detect the target species and any other special-status plants. If special-status plants are identified during the field survey, and the plants are unavoidable, lost special-status plants shall be replaced in the Open Space Plan area in suitable habitat through a revegetation plan developed by a qualified, local restoration biologist. The applicant shall prepare a detailed grading plan that defines the limits of grading. Mitigation Measure BIO-3: Fencing around the perimeter of the Comstock Homes Development site shall include 6-foot-minimum height fencing. These actions will help to isolate noise and human and pet presence between the development and important monarch aggregation sites, raptor foraging habitat, and wildlife habitats surrounding the development footprint. Mitigation Measure BIO-10: In order to protect the genetic integrity of the native plant populations on the undeveloped portions of the subject property, the project Landscape Plan shall be prepared to prohibit the use of non-locally collected native plants and seed materials for any native species used within or	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			<p>adjacent to open space areas (including plantings proposed for habitat/buffer restoration, native grassland mitigation, and landscape plantings outside perimeter fencing). Whenever native species are specified for plantings or seeding, all seed or plant material shall come from sources along the south coast. In some cases, such as for native grassland and wetland buffer species, seed shall be collected from the proposed development area, Santa Barbara Shores, or the Ellwood Mesa Open Space.</p> <p>Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area. Special-status plant species enhancement and restoration opportunities are identified in the Open Space Plan.</p>	
4.4 Biological Resources	Comstock Homes Development	Impact BIO-2: Western Snowy Plover. The proposed project would increase the permanent human population on Ellwood Mesa by 200 or more people living within 1.5 miles of snowy plover critical habitat and a major plover breeding colony on the beach at COPR. Increased beach use around Coal Oil Point by humans and their pets, especially dogs, could potentially harm nests and nestlings.	<p>Mitigation Measure BIO-2: To reduce potential impacts associated with increased visitor use of trails near the snowy plover nesting area and Sands Beach, the City of Goleta will provide an annual contribution to the COPR to assure that the reserve can continue to implement measures necessary to preserve the snowy plover roost areas.</p> <p>Mitigation Measure BIO-11: The applicant shall prepare and install biological resources protection signage, consistent with the Open Space Plan details, at open space access points adjacent to the proposed residential development, at the tops of the beach access trails, and at appropriate locations along the beach (stressing protection of snowy plovers and other shorebirds and raptor foraging and nesting information). The leash requirements for dogs shall also be incorporated into the CCRs given to homeowners in the residential development. Night lighting within and around the perimeter of the proposed residential development shall be of the minimum wattage necessary for safety and shall be shielded and directed downward to minimize light “pollution” to adjacent open space. The CCRs shall include restrictions on the type and intensity of lights allowed in back</p>	Less than Significant

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Table ES-I. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
4.4 Biological Resources	Comstock Homes Development	Impact BIO-6: Other Special-Status Wildlife. Several other special-status wildlife species do not occur in the Comstock Homes Development area, but are known to occur or have a moderate probability of occurring elsewhere under City of Goleta jurisdiction in the area or on adjacent lands. They could be affected directly and indirectly by increased human presence, increased pet activity, and collecting.	<p>yards (e.g., lights must be shielded and down-directed).</p> <p>Mitigation Measure BIO-3: Fencing around the perimeter of the Comstock Homes Development site shall include 6-foot-high fencing consisting of a 2.5-foot-high block wall with 3.5 feet of wrought iron (or tubular steel) fencing on top. Temporary construction fencing with chain link or other material satisfactory to the City of Goleta shall be installed to indicate the grading limits of the development footprint.</p> <p>Mitigation Measure BIO-4: A survey by a City of Goleta-qualified biologist shall be conducted immediately prior to construction in order to establish the current breeding and roosting status of resident raptors throughout the proposed development footprint, as well as the Santa Barbara Shores and Ellwood Mesa parcels. The survey shall include recommendations regarding minimizing impacts during construction, including but not limited to, setbacks, fence protection, restrictions on construction scheduling, etc. Consistent with the raptor protection program detailed in the Open Space And Habitat Management Plan, construction shall be timed to avoid the nesting season for raptors.</p> <p>Mitigation Measure BIO-7: A Fire Protection Program for the eucalyptus groves shall be developed by the applicant and submitted with the Final Development Plan and Tract Map. This program shall address measures within the Comstock Homes development to reduce the risk of fire and increase the potential for control should a fire occur. The program shall also prohibit smoking and motor vehicles and shall include signage stating these restrictions in the Comstock Homes Development access points to the Open Space Plan area.</p> <p>Mitigation Measure BIO-8: Native grasslands within the development footprint shall be surveyed and the amount of habitat to be removed shall be determined by measuring the</p>	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			<p>surface area of current native grassland areas for off-site mitigation at a ratio of 3:1. The mitigation plan shall include provisions for restoration of any native grassland removed due to project construction.</p> <p>Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area. Special-status wildlife management opportunities are identified in the Open Space Plan.</p>	
4.4 Biological Resources	Comstock Homes Development	<p>Impact BIO-10: Wetlands. Construction of Comstock Homes Development would maintain a 100-foot habitat buffer around the isolated wetland on Drainage B and 50-foot habitat buffer around Drainages A1, A2, and A with two exceptions. A proposed Comstock Homes Development access road would encroach into the 50-foot buffer on Drainage A1 and two detention basins would encroach into the 50-foot buffer on Drainage A. The direct loss of wetland vegetation, potential changes to the hydrology of the adjacent uplands posed by these improvements, and the effect of vegetating and maintaining the proposed detention basins in such close proximity to these resources would be considered a significant impact that can be feasibly mitigated.</p>	<p>Mitigation Measure BIO-9: The applicant shall prepare a Wetland Buffer Mitigation Plan to address project-generated impacts on adjacent wetland resources resulting from construction activities within 100 feet of any isolated wetland resource and 50 feet of riparian areas in the Comstock Homes Development. Where buffer areas are permanently lost to development, the plan shall include provisions for the enhancement (restoration and/or revegetation) of off-site wetland and vernal pool buffers within the adjacent Open Space Plan area (Ellwood Mesa) on a 3:1 basis.</p> <p>Mitigation Measure BIO-11: Refer to Mitigation Measure BIO-11 summary provided above.</p> <p>Mitigation Measure BIO-13: Improvements to the hydrology and water quality of Drainages A1, A2, and B shall be accomplished by grading and designing the development sites to direct storm water runoff into retention basins rather than to storm drain lines directly linked to Devereux Creek. The floor of the storm water retention basins shall be vegetated with native, locally occurring wetland plants that will filter and process runoff and pollutants. Sediment trapped by the basins will require periodic removal.</p> <p>The storm water retention basins shall not be used as clean-out</p>	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			<p>areas for concrete, plaster, stucco, oil, or other construction products during construction. Washout areas for construction products shall be located away from the perimeter of the construction sites and shall be lined with plastic to contain polluted water such that it can be evaporated and the residue removed from the site.</p> <p>All ground disturbances and vegetation removal shall be prohibited in the 100-foot setback established for isolated wetlands on Drainage B and 50-foot setback for riparian areas on Drainages A1, A2, and A within and associated with the unnamed eastern tributary of Devereux Creek to the maximum extent feasible.</p>	
4.4 Biological Resources	Comstock Homes Development	Impact BIO-11: Exotic Plants. The proposed project would introduce new residences and increased public access into the Open Space Plan area that although already heavily used for passive recreation, remains in a primarily undeveloped condition. The residential development on the Comstock Homes Development involves installation of extensive landscaping including private lawns and landscaped areas, non-native streetscape, and subdivision landscape improvements. The inclusion of extensive landscaping into an area where none has existed before could result in the exposure of the surrounding natural vegetation to non-native invasive and/or exotic plant species.	<p>Mitigation Measure BIO-10: In order to protect the genetic integrity of the native plant populations on the undeveloped portions of the subject property, the project Landscape Plan shall be prepared to prohibit the use of non-locally collected native plants and seed materials for any native species used within or adjacent to open space areas. (For full text see Impact BIO-1 mitigation measures.)</p> <p>Mitigation Measure BIO-11: Refer to Mitigation Measure BIO-11 summary provided above.</p>	Less than Significant
4.4 Biological Resources	Comstock Homes Development	Impact BIO-12: Water Pollution. Extensive areas of hardscape, such as roadways, driveways, and sidewalks, generate runoff during storm events that can convey petroleum-product contaminants as well as fertilizers, herbicides, fungicides, pesticides and other landscape chemicals to sensitive habitats, such as Devereux Creek and Devereux Slough.	Mitigation Measure BIO-13: Refer to Mitigation Measure BIO-13 summary provided above.	Less than Significant
4.4 Biological Resources	Ellwood Mesa Open Space Plan	Impact BIO-19. Impacts Associated with Proposed Anza Trail Widening. The Anza Trail is located on the northern portion of Ellwood Mesa and Santa Barbara Shores and avoids impacts to	Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area.	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		<p>vernal pools located to the south, monarch roosts and raptor nests to the north, and native grasslands scattered throughout the mesa area. Widening of the Anza Trail will result in the removal of 0.65 acre of non-native (annual) grassland, 0.06 acre of coyote bush scrub, and 0.002 acre of Venturan coastal sage scrub for a total of 0.712 acre. This habitat loss will be offset by the restoration of closed trails within the Ellwood Mesa Open Space, as described in a separate impact section.</p>	<p>Section 4 of the Open Space Plan identifies Anza Trail siting methods and requires special-status habitat avoidance.</p>	
4.4 Biological Resources	Ellwood Mesa Open Space Plan	<p>Impact BIO-21: Short-Term Impacts Associated with Proposed Parking Lot and Restroom. The proposed parking lot and restroom are located south of Hollister Avenue between the proposed residential development and the eucalyptus woodlands to the east. Short-term construction-related impacts include noise and dust impacts to the monarch butterfly aggregations and raptor nests in the adjacent eucalyptus woodlands</p>	<p>Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area. Monarch butterfly and raptor protection opportunities are identified in the Open Space Plan.</p>	Less than Significant
4.4 Biological Resources	Ellwood Mesa Open Space Plan	<p>Impact BIO-22: Long-Term Impacts Associated with Proposed Parking Lot and Restroom. The proposed Open Space Plan area parking lot and restroom at Hollister Avenue would result in increased human activity and increased traffic and vehicular exhaust in an area currently supporting native, open habitats. Direct impacts would include the loss of 0.5 acre of coyote bush scrub, coastal sage scrub, and non-native grassland habitat, which may be used by raptors as foraging habitat, as well as potential disturbance to raptor nest sites and monarch butterfly aggregation sites in the eucalyptus woodland to the east.</p>	<p>Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area. Monarch butterfly and raptor protection opportunities are identified in the Open Space Plan.</p>	Less than Significant
4.4 Biological Resources	All Components	<p>Impact BIO-24 (Cumulative Impacts): The proposed Comstock Homes Development together with the County's Ocean Meadows Residences and the University's Faculty and Family Student Housing would result in cumulative effects on biological resources. Cumulative effects include increased disturbance to special-status wildlife species, such as the western snowy plover (Class II).</p>	<p>Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area. Sensitive biological resources, such as the western snowy plover, are described in the Open Space Plan. Management opportunities are also presented.</p>	Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		<p>This project would contribute to increased recreational use of the combined City's Ellwood Mesa Open Space and University's South Parcel (re-designated from residential to open space), Coal Oil Point Natural Reserve, and adjacent beaches, which would increase impacts to biotic resources and sensitive habitats on these sites. These impacts would act synergistically with uses generated by recently constructed developments including Sandpiper Golf Course, Bacara Resort and Spa, Winchester Commons, Storke Ranch, Mountain View Homes, and Glen Annie Townhomes. All of these projects likely contribute significant human presence, automobiles, trash, light, noise, and pet activity to the area, which is expected to create unfavorable conditions for wildlife movement.</p>		
4.5 Hazards and Hazardous Materials	Comstock Homes Development/ Ellwood Mesa Open Space Plan	<p>Impact HM-1: Impacts From Abandoned Oil Wells. There are eight known abandoned wells in the location of the Ellwood Mesa Open Space Plan area. Due to the less stringent regulations pertaining to drilling activities in the past, these wells were not abandoned in accordance with current safety standards with the possible exception of Doty #7. The possibility exists for oil, methane or toxic gases (aromatic hydrocarbons or hydrogen sulfide) to migrate up through these wells and release to the environment. Release of methane gas has the potential to result in fire or explosion. Exposure to toxic gases could pose a health hazard to the public and/or workers engaged in construction/well abandonment activities. In addition, contaminated soil may be encountered during excavation of these wells and associated sumps or construction activities near the well locations.</p>	<p>Mitigation Measure HM-1: Historic oil wells that require re-abandonment shall be abandoned to current standards. To mitigate methane and toxic gas hazards, DOGGR has established standards for well abandonment, including re-abandonment of historic oil wells. The FPD has recommended that all wells located in the Open Space Plan area meet current standards. Historic oil wells will be re-abandoned under the direction of DOGGR and the FPD in compliance with California Code of Regulations Title 14, Chapter 4 and Section 3106 of the Public Resource Code.</p> <p>Mitigation Measure HM-2: Additional assessment, and possibly remediation, of the soils at or near the surface in the Ellwood Mesa Open Space Plan area and proposed residential development area shall be conducted as required by the FPD. Decisions regarding future remediation requirements for the area and the residential areas shall be based on a screening level human health and ecological risk evaluation. Depending on the results of the screening level risk assessments, more detailed quantitative risk assessments may be required by FPD, as necessary.</p>	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			Mitigation Measure HM-5: A Soil Management Plan for the residential development envelopes and trail construction areas shall be developed and implemented, as appropriate. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that may be encountered during construction activities (i.e., excavation and grading). The plan shall include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as FPD remediation standards that are protective of the planned use. Appropriately trained FPD professionals will be onsite during preparation, grading, and related earthwork activities to monitor soil conditions encountered. In order to confirm the absence or presence of hazardous substances associated with former land use, a sampling strategy shall be implemented.	
4.5 Hazards and Hazardous Materials	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact HM-2: Impacts from Known or Potentially Contaminated Soil. Soils in this area have the potential to be impacted by hazardous materials associated with past oil development activities. Construction activities associated with residential development of the Comstock Homes Development, trail construction within the Ellwood Mesa Open Space Plan area, or remedial activities located throughout the project area could uncover impacted soils and expose construction workers and recreational users of the site to potential health hazards. In addition, remediation activities could result in temporary impacts to recreational use of the Ellwood Mesa Open Space Plan Area due to trail closures and traffic from vehicular equipment.	Mitigation Measure HM-2: Refer to Mitigation Measure HM-2 summary provided above. Mitigation Measure HM-4: Site Remediation shall be implemented and oil field debris will be removed. Once approved by the FPD, the RAPs will be implemented. Mitigation Measure HM-5: Refer to Mitigation Measure HM-5 summary provided above.	Less than Significant
4.5 Hazards and Hazardous Materials	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact HM-3: Impacts from Physical Hazards Related to Oil Development Equipment and Debris. Abandoned oil wells and oilfield debris are present within the Ellwood Mesa Open Space Plan area and pose physical hazards to public health and safety. Debris consists of concrete, steel cables, piping, wood, wire, steel plates, etc. In addition, there are a number of areas throughout the Open Space that have not been examined at all	Mitigation Measure HM-3: As necessary, Site Remediation Action Plans shall be developed. Upon FPD concurrence with the recommendations presented the Phase II ESAs, remedial action plans shall be prepared for submittal to the FPD. Mitigation HM-4: Site Remediation shall be implemented and oil field debris will be removed. Once approved by the FPD, the	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		or have only been evaluated in terms of some parameters.	RAPs will be implemented.	
		Debris has not been identified on the Comstock Homes Development site, the Coronado Butterfly Preserve, or the Phelps Ditch Trail. Additional subsurface debris could be uncovered during construction activities associated with residential development or trail construction.		
4.6 Land Use	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact Land-2 (Cumulative Impacts): The proposed project, in combination with other proposed projects and a general increase in population and use intensity in the Open Space Plan area, would cumulatively add to a long-term demographic trend of increased public use, access or activities in the Open Space Plan area. From a cumulative land use perspective, this increase in public use, access and activity could result in disturbance to sensitive habitats and cultural resources, and general deterioration of the recreational resources. The Comstock Homes development project would add 78 residential units located immediately adjacent to the Ellwood Mesa Open Space Plan area. Residents of these homes would likely use the open space area on a regular basis. However, without additional baseline information on the level of current and projected use of the area by the general public, it is difficult to quantify the project's contribution to the cumulative impact at this time.	<p>Mitigation Measure Land Use-1: The Comstock Homes Development shall include measures designed to reduce potential long-term impacts to the Open Space Plan area. Specific measures shall include, at a minimum:</p> <ul style="list-style-type: none"> • Maintenance of the common open space areas within the development footprint • Maintenance of the public trails connecting the development to the Open Space Plan area • Installation and maintenance of interpretive signs and mutt-mitt stations at trailheads leading from the development to the Open Space Plan area • Use of educational materials to promote appreciation of resource protection and ensure the maintenance of open space plan areas <p>As the Ellwood Mesa Open Space Plan site improvements are implemented over time, those improvements and the associated maintenance and management activities shall be implemented in accordance with the design guidelines of the Ellwood Mesa Open Space Plan. Taken together, these guidelines are designed to improve and preserve habitats and habitat linkages, maintain and improve public coastal access and recreation, and increase public awareness and appreciation of natural, cultural, and recreational resources, thus diminishing the risk of unintentional or intentional</p>	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			deterioration of these resources.	
			Mitigation Land Use-2. To address impacts to Comstock Homes residents from overhead aircraft noise, including overflights of the proposed residential development which is in the instrument approach path of Runway 7 beyond the one-mile marker, the following mitigation measure is recommended: A buyer notification shall be provided to potential home buyers in the form of a Department of Real Estate (DRE) Notice of Aircraft Overflights and through a notification of aircraft overflights and associated noise levels in the project's CC&Rs.	
4.9 Visual Resources	Comstock Homes Development	Impact VIS-3: Neighborhood Compatibility. The Comstock Homes Development project proposes 78 residences with floor areas ranging from 2,900 to 4,500 square feet. These are larger units than typical residences in the nearby Santa Barbara Shores residential neighborhood. The relative impact of this size of the proposed residences can be reduced by making most of the perimeter units single story so that they are visually more compatible with other projects in the area. Also, it is important to provide adequate diversity within the neighborhood so that all the units do not appear to be from the same "cookie cutter." While there is certainly precedent for the stucco and tile roof architectural design theme in the project area, other design styles should also be considered that are compatible with and subordinate to the natural character of the site and compatible with surrounding neighborhoods. While variation in architectural style is desirable, such variation should still create a sense of visual cohesion.	Mitigation VIS-4: Neighborhood Compatibility. The project shall be reviewed and approved by the City of Goleta DRB. The DRB shall review the project and recommend changes to the architectural design so as to minimize incompatibility with surrounding neighborhoods. The applicant shall modify and vary its architectural design in accordance with the recommendations of the DRB.	Less than Significant
4.9 Visual Resources	All Components	Impact VIS-5: Light and Glare from Residential Development and Open Space Improvements. There is a potential for visual impacts due to night lighting and glare generated by the residential development and the Open Space Plan parking area. Light and glare can substantially degrade existing visual conditions when new development occurs in existing open spaces where nearby uses may be disturbed or the view by	Mitigation Measure VIS-5A: Lighting and Glare. To prevent night time glare, any exterior lighting installed on the project site shall be of low intensity, low glare design, and shall be hooded to direct light downward onto the subject parcel and prevent spill over onto adjacent parcels. All light fixtures shall be shielded so that neither the lamp nor the related reflective interior surface is visible from any of the KOPs. All light poles, fixtures, and hoods	Less than Significant

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Table ES-I. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		<p>those using adjacent public areas is significantly affected.</p> <p>Without shielding, lighting would become a dominant feature in the landscape. However, after full darkness the number of people using the open space drops to a minimal level. There will be short-term significant lighting and glare impacts until the vegetative screening grows into relative maturity in five years. Once the landscape plantings mature, the lighting impact will be similar to and seen within the context of the existing Santa Barbara Shores residential neighborhood.</p>	<p>shall be dark colored (non-reflective). Security and street lighting shall be shielded so as not to create glare when viewed from the KOPs. The light poles and fixtures shall not be obtrusive to travelers along Hollister Avenue or the public open space areas.</p> <p>Mitigation Measure VIS-5B: Night Lighting. To prevent night time light and glare from the proposed Santa Barbara Shores public parking area, all public parking lot and restroom lighting shall be set on a timer to shut off no more than 90 minutes after sundown.</p>	
4.10 Recreation	Ellwood Mesa Open Space Plan	<p>Impact REC-7: Trail Construction, Well Abandonment, and Soil Remediation. Trail construction, abandonment of historic wells, possible remediation of impacted soils, and debris removal activities on the Ellwood Mesa Open Space area could result in temporary trail closures, temporary loss of coastal access, and short-term nuisance effects from dust, debris, or potential hazards. Potential long-term impacts to recreation could result if existing hazards are worsened or if new hazards are created as a result of these activities.</p>	<p>Mitigation Measure REC-4: Impacts to recreation shall be minimized to the maximum extent feasible during trail construction, abandonment of historic wells, soil remediation, debris removal, and other physical construction and maintenance activities within the Ellwood Mesa Open Space.</p> <p>Temporary signs shall be posted at trailheads and along haul routes and major trail intersections notifying trail users of the location and timing of scheduled activities, and notifying the public of alternative routes. Onsite traffic controllers shall be employed to ensure public safety during working hours. During non-working hours, haul routes shall remain open to the public and no barriers or obstruction shall be erected that would otherwise prohibit public use of the trails, subject to public safety requirements.</p> <p>Excavated areas shall be fenced to avoid any public safety hazards excavated areas shall be backfilled such that open pits shall be no deeper than 5 feet, and slopes no steeper than 2:1 until site contouring has been completed.</p> <p>A complaint telephone number shall be provided on the public notifications. Complaints and actions taken to resolve complaints shall be logged by the City of Goleta. Additional temporary signs</p>	

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			shall be posted at work sites as necessary to ensure public safety.	
4.11 Cultural Resources	Comstock Homes Development	Impact Cultural-1: Grading activities associated with site preparation at the Comstock Homes Development site, trail improvements and restoration activities in the Open Space Plan area, and/or excavations associated with potential hazardous waste remediation activities in the project area could impact previously undiscovered cultural resources. In the event that project related activities impact a previously undiscovered CRHR eligible cultural resource, this would be considered an impact that can be feasibly mitigated.	Mitigation Measure Cultural-1: All earth disturbances within the construction area shall be monitored by a City qualified archaeologist and a Native American Consultant pursuant to County Archaeological Guidelines. Mitigation Measure Cultural-2: In the event that archaeological remains are encountered during grading, work shall be stopped immediately or redirected until City qualified archaeologist and Native American representatives are retained by the applicant to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to the Phase 3 mitigation program consistent with County Archaeological Guidelines funded by the applicant. Mitigation Measure Cultural-3: The Comstock Homes Development shall develop and provide to homeowners, educational material related to resource protection policies and practices within the Ellwood Mesa Open Space Plan area, and within common open space areas of the development footprint.	Less than Significant
4.11 Cultural Resources	Comstock Homes Development	Impact Cultural-2: The proposed project, in combination with other proposed projects and a general increase in population and use intensity in the Open Space Plan area, would cumulatively add to a long-term trend of increased public use, access or activities in the Open Space Plan area. This increase in public use, access, and activity could result in disturbance or looting of previously undiscovered CRHR eligible sites.	Mitigation Measure Cultural-3: The Comstock Homes Development shall develop and provide to homeowners, educational material related to resource protection policies and practices within the Ellwood Mesa Open Space Plan area, and within common open space areas of the development footprint.	Less than Significant
4.12 Traffic and Circulation	Ellwood Mesa Open Space Plan	Impact Traffic-3. The proposed access to the park would require major revisions to the existing traffic signal at Hollister Avenue/Ellwood School intersection.	Mitigation Measure Traffic-3: Access to the Open Space Plan Santa Barbara Shores Parking Lot is proposed on Hollister Avenue directly opposite the Ellwood School entrance driveway. The addition of a southern leg to the existing signalized Hollister Avenue/Ellwood School intersection would result in the reconfiguration of the intersection and modification of the signal. The parking lot driveway connection should be aligned with the	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
			<p>Ellwood School entrance driveway. An encroachment permit will be required from the City for the frontage improvements along Hollister Avenue adjacent to the site.</p> <p>Mitigation Measure Traffic-4: A Traffic Management Plan (TMP) will also be required to minimize construction impacts on motorists, pedestrians, and bicyclist using Hollister Avenue during the construction period. The TMP will include traffic handling features according to City requirements. Constructing the frontage improvements along Hollister Avenue during the summer period, when the adjacent Ellwood School is not in session, would minimize impacts to the school.</p>	
4.13 Noise	Comstock Homes Development	Impact N-1: Hollister Traffic Noise. Future noise levels from traffic on Hollister Avenue would exceed 65 dBA CNEL at the northern lots within the project.	Mitigation Measure N-1: The project developer shall construct a 6-foot high solid wall along the northern portions of the project perimeter in substantial conformance with the location shown on the tentative subdivision map for the project.	Less than Significant
4.13 Noise	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact: Cumulative Noise Impacts. If construction activities were simultaneously underway at the Comstock Homes Development site and the new open space parking facilities, it is possible but unlikely that a net peak noise level would exceed 90 dBA. However, the low potential for noise levels to adversely affect existing residences would be offset by the benefit of a reduction in the total duration of construction. Individual noise mitigation measures would apply in any case, and would reduce the potential for cumulative noise impacts.	<p>Mitigation Measure N-2: Construction activity for site preparation and for future development shall be limited to the hours between 7:00 a.m. and 4:00 p.m., Monday through Friday. No construction shall occur on State holidays (e.g. Thanksgiving, Labor Day). Construction equipment maintenance shall be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions.</p> <p>Mitigation Measure N-4: Stationary construction equipment that generates noise in excess of 65 dBA at the project boundaries shall be shielded and located as far towards the interior of the construction site as practical to minimize the noise levels at the residences to the east, the Ellwood Elementary School to the northeast, and the golf course to the west.</p>	Less than Significant
4.14 Air Quality	Comstock Homes Development	Impact AQ-1: Construction Dust. Ground disturbances and equipment operation during construction activities would produce short-term PM ₁₀ emissions. Implementation of the proposed project would generate construction-related air pollutant emissions from two general activity categories,	Mitigation Measure AQ-1: Dust generated by project construction shall be kept to a minimum by a series of dust control measures.	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		entrained dust and vehicle emissions. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM ₁₀ emissions. Vehicle exhaust results from internal combustion engines used by construction equipment and vehicles which results in emissions of CO, ROG, NO _x , and PM ₁₀ .		
4.14 Air Quality	Ellwood Mesa Open Space Area	Impact AQ-6: Construction Dust. Ground disturbances and equipment operation during construction activities would produce short-term PM ₁₀ emissions. Construction of the parking lot, restrooms, and trail improvements would generate construction-related air pollutant emissions from two general activity categories, entrained dust and vehicle and equipment emissions. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM ₁₀ emissions. Vehicle exhaust results from internal combustion engines used by construction equipment and vehicles which result in emissions of CO, ROG, NO _x , and PM ₁₀ .	Mitigation Measure AQ-1: Dust generated by project construction shall be kept to a minimum by a series of dust control measures.	Less than Significant
4.14 Air Quality	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact AQ-7: Construction Dust. PM ₁₀ emissions from project construction would result in a potentially significant contribution to cumulative PM ₁₀ impacts in the area. The County's Environmental Thresholds & Guidelines Manual (1995) states that a project's contribution to cumulative air quality impacts, either regional or localized, should be evaluated based on existing programs and plans, including the County's Air Quality Attainment Plan (AQAP). Although Santa Barbara County is currently in non-attainment of state standards for PM ₁₀ emissions, and project generated PM ₁₀ emissions could exacerbate such non-attainment, implementation of standard County Grading Ordinance and SBCAPCD dust control measures based on the County's AQAP would ensure that the project's contribution to cumulative levels of PM ₁₀ emissions would be less than significant.	Mitigation Measure AQ-1: Dust generated by project construction shall be kept to a minimum by a series of dust control measures.	Less than Significant

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
4.15 Public Services	Comstock Homes Development	Impact PS-5: Increased Demand on Fire Protection Services. The proposed project would present an increase of population requiring fire protection services. The Comstock Homes Development would generate approximately 235 new residents in the area. The residential units would be exposed to moderate to high fire hazards due to their close proximity to mature eucalyptus trees and extensive grasslands. The Comstock Homes Development would not hinder the Fire Department's ability to maintain a response time of 5 minutes or less.	Mitigation Measure PS-10: The applicant shall provide an adequate number of fire hydrants as determined by the Fire Department.	Less than Significant
4.15 Public Services	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact PS-9: As there are a significant number of proposed and pending projects within the vicinity of the proposed Comstock Homes Development and the Ellwood Mesa Open Space Plan area, it is anticipated that the subject project would incrementally contribute to cumulative impacts to public services in the region. One of the key mechanisms utilized by the City of Goleta to ensure that primary public services are maintained commensurate with growth are the Goleta Development Impact Fees. These fees provide the fire, police departments, and school districts with a revenue stream that enables them to provide a relatively consistent level of service. Other services providers such as the Goleta Water District, Goleta West Sanitary District, Southern California Edison, and Southern California Gas not only have planned for the anticipated growth through participation in the development of the regional plans and zoning ordinances, but also benefit from revenue streams from the new developments through assorted connection and hook-up charges, ensuring a continuation of adequate service.	Mitigation Measure PS-2: The applicant shall pay the applicable Goleta Development Impact Fees in effect at the time of project approval, including school, sheriff, and fire fees, prior to occupancy. Mitigation Measure PS-3: The applicant shall notify GUSD and SBHSD of the expected buildout date of the project to allow the districts time to plan for the new students.	Less than Significant
4.15 Public Services	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact PS-10: Considering anticipated project build-out in the vicinity of the Goleta Valley, the Comstock Homes Development would incrementally contribute to a significant increase in the solid waste stream, further diminishing capacity at the Tajiguas landfill. As the increase in housing and corresponding waste streams generated by the Comstock	Mitigation Measure PS-6: The permittee shall develop and implement a Solid Waste Management Program for the residential development. The program shall include one or more of the following measures, but is not limited to those measures: a. Provision of space and/or bins for storage of recyclable	Less than Significant

**COMSTOCK HOMES DEVELOPMENT AND
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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		Homes Development were anticipated as a part of the regional planning and zoning process, mitigation measures established as a part of this development result in a cumulative impact on solid waste disposal that is considered to be feasibly mitigated.	<p>materials within the project site</p> <ul style="list-style-type: none"> b. Implementation of a curbside recycling and green waste program to serve the new development c. Development of a plan for accessible collection of materials on a regular basis d. Regular composting of lawn clippings and other landscape materials 	

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Table ES-I. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
Class III Impacts				
4.2 Geology and Geologic Hazards	Comstock Homes Development	Impact GEO-3: Slope Stability. Project grading during creation of cut and fill slopes that are not anticipated to be prone to failure. Given the gently sloping nature of the site in most areas, any final slopes included in the project would not be anticipated to create an unstable slope. In any case, engineered slopes included in the project would be required to meet established standards in the CBC and City of Goleta Grading Ordinance.	None required.	N/A
4.3 Hydrology and Water Quality	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact H/WQ-4: Devereux Creek Sewer Trunkline Connection. The GWSD's Devereux trunkline is located in the riparian corridor of Devereux Creek in a designated Environmentally Sensitive Habitat Area (ESHA). The Devereux trunkline is proposed to receive an estimated 13,100 gallons per day of sewage flows from the Comstock Homes development. The trunkline segment east of the Santa Barbara Shores parcel (east of Santa Barbara Shores Drive) has experienced cracks from root intrusion, with associated sewer leaks in the area of the eucalyptus groves. Sewer leaks in the Devereux Creek riparian corridor represent a long-term human health and water quality problem in the Devereux watershed. From a water quality perspective, the project's proposed increased load into the Devereux trunkline is considered adverse but not significant because the Devereux trunkline is proposed to be upgraded by GWSD in areas of historical leaks, and because the post-development flows into the trunk line would not exceed the present flows after GWSD planned improvements are completed.	Recommended Mitigation Measure H/WQ-3: The Comstock Homes Development project and the Ellwood Mesa Open Space restroom shall avoid sanitary connections to the Devereux trunkline, which is partly located within a City-identified ESHA.	N/A
4.4 Biological Resources	Comstock Homes Development	Impact BIO-7: Non-Regulated Wildlife Species. The Comstock Homes Development includes the loss of 18 acres of open space habitats. Removal of these areas is considered a less than significant impact on common wildlife species such as raccoons, striped skunks, and western fence lizards. These species are considered common and the removal of 18 acres of native and non-native habitats would not reduce the local populations of	None required.	N/A

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Table ES-I. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		common species.		
4.4 Biological Resources	Comstock Homes Development	Impact BIO-8: Wildlife Corridor. The proposed residential development project is located in the northwestern corner of the project area and is bordered on the west, north, and east by existing development and major transportation corridors. The site contains mostly disturbed non-native grassland habitat. Consequently, the Comstock Homes Development site provides at best, limited opportunities for dispersal of ground-dwelling wildlife between the site and points north, west, or east. The project proposes to maintain a 50-foot wide habitat buffer between development and Drainages A1 and A2, but would eliminate most of Drainage B. These poorly-developed north/south-trending drainages do not appear to be significant corridors for wildlife movement within the parcel and do not provide habitat connections to points north.	None required.	N/A
4.4 Biological Resources	Coronado Butterfly Preserve	Impact BIO-13: General Impact Associated with Proposed Trail System. The proposed trail system in the Coronado Butterfly Preserve and neighborhood trail area was designed to minimize impacts to sensitive biological resources such as wetlands, monarch overwintering sites, and raptor nests. As such, the existing trails were selected as the proposed managed trail system and trail closures are consistent with the Coronado Butterfly Preserve management plan. There are no additional biological resource impacts resulting from the proposed trail system as the proposed trail footprint is located within the existing trail system.	None required.	N/A
4.4 Biological Resources	Phelps Ditch Trail	Impact BIO-16: General Impacts Associated with Proposed Phelps Ditch Trail. The proposed trail system in the Phelps Ditch Trail site was designed to minimize impacts to sensitive biological resources such as wetlands, thus utilizing the existing trail system paralleling the west bank of Phelps Ditch. A total of 548 feet of existing trails comprise the proposed trail system in the Phelps Ditch Trail site. There are no additional impacts resulting from the proposed trail system, as the proposed trail	None required.	N/A

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		footprint is located within the existing trail system.		
4.4 Biological Resources	Ellwood Mesa Open Space Plan	Impact BIO-18: General Impacts Associated with Proposed Trail System. The proposed trail system in the Ellwood Mesa Open Space Plan area was designed to minimize impacts to sensitive biological resources such as vernal pools, coastal bluff scrub, wetlands, monarch overwintering sites, and raptor nests. A total of 27,059 feet (5.1 miles) of existing trails comprise the proposed trail system in the Ellwood Mesa Open Space. With the exception of widening the Anza Trail (impacts are described separately), there are no additional impacts resulting from the proposed trail system as the proposed trail footprint is located within the existing trail system.	None required.	N/A
4.5 Hazards and Hazardous Materials	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact HM-4: Impacts to Water Quality from Contaminated Soil Leaching to Groundwater or Migrating to the Devereux Creek or Devereux Slough. Contaminants present in impacted soil located in the Ellwood Mesa Open Space Plan area have the potential to leach into groundwater or to migrate to water bodies located in the Open Space Plan area. Water quality data is limited to a single monitoring well (MW-1) located in Devereux Creek, which contained trace levels of TPH. There is the potential for residual TPH to migrate into Devereux Creek, Devereux Slough, or the Pacific Ocean. It is difficult to differentiate between naturally occurring oil seeps impacting surface water and residual TPH associated with historic production. There is no available data indicating an impact significant or otherwise. The RWQCB oversaw the previous remediation conducted in the Ellwood Mesa Open Space Plan area and was satisfied with the cleanup eliminating water quality issues.	None required.	N/A
4.5 Hazards and Hazardous Materials	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Cumulative Impact: There is the potential for cumulative impacts resulting from increased contaminated soil being disposed of at an offsite disposal facility associated with remediation activities. The amount of contaminated soils generated by this project is expected to be relatively minor and no significant contribution to cumulative effects associated	None required.	N/A

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
	Plan	with potential reduced landfill capacity is anticipated.		
4.9 Visual Resources	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact VIS-2: Views from Winchester Commons. This area lies 0.25 mile north-northwest of the project site and is separated from the site by commercial development along Hollister Avenue, the Union Pacific Railroad, two separate eucalyptus windrows, and Highway 101. It was determined that the primary views south from Winchester Commons are toward the Sandpiper Golf Course and the Barnsdall Gas Station on Hollister Avenue. Thus, the project site is not in direct views south from Winchester Commons. There are two major windrows of eucalyptus trees between Winchester Commons and the project site which effectively screen Winchester Commons' views of the site. Since the highest structures are proposed to be 28 feet in height, the project would not be significantly visible from the Winchester Commons.	None required.	N/A
4.9 Visual Resources	Comstock Homes Development	Impact VIS-4: Visual Impacts Related to the Santa Barbara Shores Public Access Area. Proposed development of a public access area has minimal potential to affect views either south from Hollister Avenue or north from the Santa Barbara Shores open space area. Only one vertical feature, a public restroom, is proposed in this area. While exact location and size are not specified at this time, it is anticipated that the restroom structure would be located close to Hollister Avenue immediately south of the eucalyptus windrow to facilitate a sewer hook-up. It is also anticipated that the structure would be small (approximately 15 feet in height and 600 square feet) and the materials would be buff colored permeable concrete appropriate to the surrounding vegetation such that the structure will be subordinate to the site with minimal contrast. Development of the public access area is not expected to impair views.	None required.	N/A
4.9 Visual Resources	Comstock Homes Development	Impact VIS-6: Short-Term Construction Impacts. The project would be highly visible during the construction period and for a least the first five years until the landscaping reaches a level	None required.	N/A

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		adequate to screen the project.		
		In a visual sense, construction impacts will be obtrusive and out of character with the existing adjacent buildings and related pedestrian activity. This situation would be expected of moving equipment and the erection of raw materials without the mitigation of final colors and landscaping		
4.10 Recreation	Comstock Homes Development	Impact REC-1: Impacts to Existing Regional Recreation Facilities. The overall projected increase in the residential population of 234 persons could result in a related increase in the demand for parks or other recreational facilities within the City of Goleta. Using the adopted countywide and citywide ratio of 4.7 acres per 1,000 persons, the addition of 234 persons would result demands for 1.1 acres of new parkland. Currently, the unincorporated County contains 8,372 acres of parkland, and the City of Goleta contains 382 acres of parkland. These parklands total 8,754 acres, or 45.26 acres of parkland per 1,000 residents in the combined unincorporated County of Santa Barbara and City of Goleta area. This is substantially more than the respective adopted countywide and citywide ratio of 4.7 acres per 1,000 persons.	None required.	N/A
4.10 Recreation	Comstock Homes Development	Impact REC-2: Demand for New Regional Recreation Facilities. The residential project component would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	None required.	N/A
4.12 Traffic & Circulation	Comstock Homes Development	Impact Traffic-1: The Comstock Homes Development would generate 746 ADT on the study-area roadways. The operational characteristics of the roadway segments within the study area were analyzed assuming the existing + project ADT volumes. Based on standard engineering roadway capacities, it was determined that the all of the roadway segments in the study area would continue to operate acceptably at LOS C or better with existing + project ADT volumes. The proposed	None required.	N/A

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		project would thus not result in any specific impacts on the study area roadway segments.		
4.12 Traffic & Circulation	Comstock Homes Development	Impact Traffic-4: The Comstock Homes Development would generate 746 ADT on the study-area roadways under cumulative conditions. No significant cumulative roadway impacts were identified in the study area based on City thresholds.	None required.	N/A
4.12 Traffic & Circulation	Comstock Homes Development	Impact Traffic-5: The Comstock Homes Development would generate 79 P.M. PHT at the study-area intersections under cumulative conditions. No significant cumulative impacts were identified at study-area intersections based on City thresholds. Most study area intersections are forecast to operate at LOS C or better during the p.m. peak hour period under cumulative and cumulative + project conditions. The Storke Road/ Hollister Avenue intersection is forecast to operate at LOS E. The project would add 0.008 to the V/C ratio, which is below the cumulative impact threshold for intersections forecast to operate at LOS E.	Mitigation Measure Traffic-2: The project will be required to provide frontage improvements along Hollister Avenue, including the installation of a westbound left turn pocket with a minimum length of 150 feet at the project driveway. City staff has indicated that the frontage improvements for Hollister Avenue will need to be designed to accommodate a future street right-of-way of 104 feet. The sidewalk area should have tree wells and trees at the back of the curb where there is a void of existing trees. Street lighting will also be required at 250-foot intervals or at intersections and mid-block at a minimum. A bus stop will need to be sited westerly of the Ellwood School and proposed Open Space parking lot intersection.	N/A
4.14 Air Quality	Comstock Homes Development	Impact AQ-2: Construction-Phase Vehicle Exhaust. Heavy equipment used during proposed construction activities would produce adverse, but less than significant, combustive NO _x and ROG emissions. The use of heavy equipment during proposed construction activities would produce emissions in the form of NO _x and ROG.	None required.	N/A
4.14 Air Quality	Comstock Homes Development	Impact AQ-4: Odor Issues. The project would increase the number of people exposed to sources of odors within the region. Venoco's Ellwood onshore oil and gas processing plant, located approximately 0.5 mile west of the project site, is a source of odorous emissions in close proximity to the project site. Additionally, other occasional odor sources in the region include Venoco's Platform Holly, natural offshore seeps, and sour water from agricultural water wells. Venoco has recently invested in technologies designed to significantly reduce the	Mitigation Measure AQ-5: The applicant shall notify potential buyers of potential odor problems in the project area.	N/A

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		risk of odorous emissions in the region. Locating new residences in proximity to these odorous emissions may create nuisance complaint situations.		
4.14 Air Quality	Comstock Homes Development	Impact AQ-5: Regional HAP Emissions. The project would increase the number of people exposed to sources of HAP emissions within the region. The Venoco oil and gas processing facility, located approximately 0.5 mile west of the project site, is a source of HAP emissions in close proximity to the project site. Prospective residents of the proposed project would potentially be subject to levels of acute non-cancer airborne HAPs (hydrogen sulfide in this specific case) greater than the SBCAPCD risk program thresholds if controls are not implemented by the time construction of the development is complete.	Mitigation Measure AQ-5: The applicant shall notify potential buyers of potential odor problems in the project area.	N/A
4.14 Air Quality	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact AQ-8: Cumulative Construction-Phase Vehicle Exhaust. NO _x and ROG emissions from project construction would contribute to cumulative emissions of NO _x and ROG within the South Central Coast Air Basin. However, because project construction-related generation of ROG and NO _x emissions has already been accounted for in the County's ozone attainment planning process (e.g., the County's 2001 CAP), the project's contribution to regional cumulative ozone levels would be considered less than significant.	None required.	N/A
4.14 Air Quality	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact AQ-10. Implementation of the proposed project would not expose sensitive receptors to substantial CO concentrations (or "hotspots"). The traffic analysis presented in Section 4.12 showed that cumulative traffic contributions are anticipated to exceed 800 peak hour trips per lane at the Storke/Hollister intersection, the only intersection in the study area to exceed this threshold. This is also the only study area intersection to forecast a Level of Service (LOS) D designation during peak hours under cumulative plus project conditions.	None required.	N/A
A simplified CALINE4 screening procedure was used to predict				

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		future CO concentrations at the Hollister/Storke intersection for the year 2005. Results are well below the national and state 8-hour ambient air quality standard of 9 ppm.		
4.15 Public Services	Comstock Homes Development	Impact PS-1: Increased Energy Demand. Proposed development of the Comstock Homes would increase demands on electrical and natural gas supplies. The project would entail the construction of electrical line extensions and perhaps the addition of local transformers, which is a normal activity for such developments. The existing natural gas distribution infrastructure is sufficient to handle the loads required by the proposed Comstock Homes. Similar to SCE, SoCal Gas would be required to install line extensions to the housing and apartment units from the nearby feeder lines.	Mitigation Measure PS-1: Because impacts on energy resources are less than significant, no specific mitigation measures are required. However, mitigation measures designed to decrease the use of electricity and natural gas are included relative to the air quality resource area (see Mitigation Measure AQ-3).	N/A
4.15 Public Services	Comstock Homes Development	Impact PS-2: Increased Demand on Sewer Conveyance and Treatment. The proposed project would require an extension of sewer facilities to serve future residents, and although a sewer connection would be required for the project, the extension would not create significant or growth-inducing impacts since sewer service already exists in the immediate vicinity of the proposed Comstock Homes Development. In addition, the existing wastewater conveyance systems are anticipated to be sufficient to handle the additional flows to the wastewater treatment plant, although a lift station would need to be constructed if the Comstock Homes Development is interconnected with the Hollister trunk line.	Mitigation Measure PS-1 I: The applicant shall provide a can and will serve letter from the GWSD indicating that adequate capacity is available to serve the project.	N/A
4.15 Public Services	Comstock Homes Development	Impact PS-3: Generation of Additional Students. The proposed project would result in the generation of additional students for local school districts. Using the student generation factors provided by the local school districts, the proposed 78-unit project would generate approximately 23 elementary students, four junior high school students, and nine high school students.	Mitigation Measure PS-3: The applicant shall notify GUSD and SBHSD of the expected buildout date of the project to allow the districts time to plan for the new students.	N/A

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
4.15 Public Services	Comstock Homes Development	Impact PS-4: Increased Demand on Police Protection Services. The proposed project would present an increase of population requiring additional police protection services. The number of existing officers would be adequate to provide police protection to the area served by the residential development.	None required.	N/A
4.15 Public Services	Comstock Homes Development	Impact PS-6: Generation of Construction-Phase Solid Waste. Generation of solid waste would occur as a result of short-term construction impacts. The proposed project would potentially generate excess construction materials during project buildout, some with the potential for reuse or recycling. These impacts would be short term and only occur during construction activities.	Mitigation Measure PS-4: Demolition and/or excess construction materials shall be separated on site for re-use/recycling or proper disposal (e.g. concrete, asphalt). During grading and construction, separate bins for recycling construction materials and brush shall be provided on site.	N/A
4.15 Public Services	Comstock Homes Development	Impact PS-7: Generation of Residential Solid Waste. Significant amounts of solid waste would be generated at the proposed project at full build-out. The proposed Comstock Homes Development would result in the generation of 223 tons of solid waste per year (3.01 persons/single family unit, 2.65/detached x 0.95 tons/individual), not considering potential recycling reductions. Should a permittee fully implement a recycling program, it is estimated that a project waste stream can be reduced 50 percent or in this case reduce anticipated solid waste generation to 112 tons per year. Total solid waste generated would therefore not exceed the project-specific significance threshold of 196 tons per year.	<p>Mitigation Measure PS-5: Materials with recycled content shall be used in project construction. The applicant shall submit, along with the Solid Waste Management Program, a description of the amounts and types of recycled materials to be used in project construction to the City of Goleta.</p> <p>Mitigation Measure PS-6: The permittee shall develop and implement a Solid Waste Management Program for the residential development. The program shall include one or more of the following measures, but is not limited to those measures:</p> <ul style="list-style-type: none"> a) Provision of space and/or bins for storage of recyclable materials within the project site b) Implementation of a curbside recycling and green waste program to serve the new development c) Development of a plan for accessible collection of materials on a regular basis d) Regular composting of lawn clippings and other landscape materials 	N/A

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
4.15 Public Services	Comstock Homes Development	<p>Impact PS-8: Increased Demand on Water Supplies. The proposed 78-unit project would involve an estimated increase in water demand of 30 acre feet per year (AFY) (0.3 AFY per home x 50 homes [< 0.25 acre] + 0.53 AFY per home x 28 homes [> 0.25 acre]). The Significance Threshold states that service through the Goleta Water District (GWD) does not have the potential to cause or contribute to groundwater basin overdraft due to GWD’s compliance with the <i>Wright</i> Judgment. Further, the GWD has adequate water supplies to support current and all anticipated future demand within the GWD service area through 2020.</p>	<p>Mitigation Measure PS-7: The project landscape plan shall be developed to maximize the use of low-water demand species for ornamental purposes. Project codes, covenants, and restrictions (CCRs) shall include information and photographs about drought-tolerant plantings for individual private spaces (i.e., front and back yards) and encourage and facilitate owner use of these water-saving species.</p> <p>Mitigation Measure PS-8: The applicant shall, where feasible, utilize GWD reclaimed water for all common area exterior landscaping. Non-reclaimed water shall not be used to water exterior landscape. If not feasible, the applicant shall provide documentation as to the efforts made to procure reclaimed water purveyors and the negative outcome.</p> <p>Mitigation Measure PS-9: Indoor water use in all proposed structures shall be limited through the following measures:</p> <ul style="list-style-type: none"> a) Recirculating, point-of-use, or on-demand water heaters shall be installed b) Low flow toilets shall be installed <p>Mitigation Measure PS-11: The applicant shall obtain a can and will serve letter from the GWD indicating that adequate water is available to serve the project.</p>	N/A

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
Class IV Impacts				
4.3 Hydrology and Water Quality	Ellwood Mesa Open Space Plan	Impact H/WQ-10: Pollution from Devereux Creek Bridge and Boardwalk Scenario. From a hydrologic, flooding, and water quality perspective, the Devereux Creek Boardwalk and Steps Scenario, which could include a boardwalk through seasonally inundated creek crossings and steps on the slopes leading to the Main Monarch Grove, would provide a long-term benefit to the hydrologic, flooding and water quality environment.	None required.	N/A
4.4 Biological Resources	Coronado Butterfly Preserve	Impact BIO-14: Impacts Associated with Closed Trail System. The proposed trail system in the Coronado Butterfly Preserve includes trail closures as part of restoration and conservation practices. A total of 800 feet of existing trails would be closed and restored. The Coronado Butterfly Preserve management committee will restore the trails as part of their existing management practices. Trail closure and restoration will result in the creation of 0.5 acres of native habitat in an existing disturbed area.	None required.	N/A
4.4 Biological Resources	Coronado Butterfly Preserve	Impact BIO-15: Rezoning from Residential to Recreation. Parcels within the Coronado Butterfly Preserve and neighborhood trail will be rezoned from residential to recreation. The area would be managed to protect, enhance, and restore biological resources. The Open Space Plan is being prepared concurrently with this EIR. The Open Space Plan will include management practices within the contiguous open space that connects the Coronado Butterfly Preserve and Ellwood Mesa Open Space with the University and County proposed open space for a total of 650 acres.	None required.	N/A
4.4 Biological Resources	Phelps Ditch Trail	Impact BIO-17: Managing Public Access. The Phelps Ditch Trail is a major connector from the existing residences to the north into the Open Space Plan area. Managing public access along the Phelps Ditch Trail will encourage increased environmental awareness through informational signage at trail heads. Allowable public uses as stated in the Ellwood Mesa Open Space Plan will encourage proper trail behavior such as staying	None required.	N/A

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		on the trail, staying out of the riparian corridor, maintaining dogs on leashes, and using dog mitts for waste clean-up. Managed public access will likely improve public environmental awareness and trail use behavior.		
4.4 Biological Resources	Ellwood Mesa Open Space Plan	Impact BIO-20: Impacts Associated with Closed Trail System. The proposed trail system in the Ellwood Mesa Open Space Plan area includes trail closures as part of restoration and conservation practices. A total of 25,930 feet (4.9 miles) of existing trails would be closed and restored. Trail closure and restoration will result in the creation of 4.7 acres of native habitat in an existing disturbed area.	None required.	N/A
4.4 Biological Resources	Ellwood Mesa Open Space Plan	Impact BIO-23: Rezoning from Planned Residential to Recreation. The proposed Ellwood Mesa Open Space Plan area would preserve 231.5 acres of passive open space as part of the rezone from planned residential to recreation. The Open Space Plan will include management practices within the contiguous open space, that connects with the University and County proposed open space for a total of 652 acres. The management actions developed in the Open Space Plan are intended to respect the area's undeveloped and ecological character, disperse recreation across the entire open space area (except in restricted portions of the Coal Oil Point Reserve), and maintain the diverse and informal character of existing recreational activities, while also protecting, restoring, and enhancing important habitats and ecological relationships in the area.	Mitigation Measure BIO-14: The Ellwood-Devereux Coast Open Space Plan includes measures for protection and management of biological resources in the Ellwood Mesa Open Space area. Protecting the golf course from residential development maintains an important connection between Devereux Creek, which bisects the golf course with adjacent managed Open Space lands on the University's South Parcel. South Parcel restoration and enhancement opportunities are described in more detail in the Open Space Plan.	N/A
4.6 Land Use	Comstock Homes Development/ Ellwood Mesa Open Space Plan	Impact Land-1: Cumulative Impact. From a cumulative land use perspective, the proposed Comstock Homes and Ellwood Mesa Open Space Plan project and rezone components, in combination with other residential developments and long-term implementation of the Open Space Plan, would improve the regional land use setting by balancing the need for additional housing with the need for coastal resource protection. This balance would be achieved by a) siting residential development away from coastal resources, b)	None required.	N/A

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Table ES-1. Summary of Impacts and Mitigations (Continued)

Resource Area	Project Component	Impact Summary	Mitigation Measure Summary	Residual Impact
		rezoning residentially zoned land to recreation, thus setting aside several contiguous coastal parcels for permanent open space and recreation, and c) providing a management plan to guide the funding and implementation of long-term conservation and preservation of the open space lands.		
4.10 Recreation	Ellwood Mesa Open Space Plan	<p>Impact REC-4: Open Space Rezone and Access Improvements. At the time of the rezone for the 36-acre Comstock site, the project would simultaneously convert the 136.62-acre Ellwood Mesa Open Space properties from residential to recreational use, substantially offsetting the lost recreationally-zone properties. In addition to the proposed rezone to recreation, long-term implementation of the Ellwood Mesa Open Space Plan would provide trail amenities including an improved parking area, a public restroom, mutt-mitts for pets, and interpretive signs at trailheads.</p> <p>The long-term preservation of coastal access and passive recreational land (via the rezone) and management of the open space trails and coastal access points are considered beneficial recreational impacts to both the local neighborhoods of the Ellwood community and the South Coast region in general.</p>	None required.	N/A