Draft Long Range Development Plan Amendment

Coal Oil Point Management Plan
Edit to Table A.1: Summary, and LRDP Figure Mapping Corrections
# TABLE OF CONTENTS

INTRODUCTION .......................................................................................................................... 3

PART 1: COAL OIL POINT MANAGEMENT PLAN ................................................................. 3

BACKGROUND .......................................................................................................................... 3

DEVELOPMENT .......................................................................................................................... 4

EXISTING DEVELOPMENT/SETTING ...................................................................................... 4

AUXILIARY EQUIPMENT FOR RESEARCH AND EDUCATION ............................................. 4

ACCESS AND RESERVE USE ............................................................................................. 7

FACILITY AND INFRASTRUCTURE MAINTENANCE ................................................................. 8

PLANNED DEVELOPMENT ...................................................................................................... 8

CONFINED ANIMAL FACILITY AND ANIMAL KEEPING ...................................................... 9

NATURE CENTER ..................................................................................................................... 10

UCSB AND SURROUNDING JURISDICTION DEVELOPMENT-POTENTIAL IMPACTS ON THE RESERVE ............................................................... 11

PROGRAMS ................................................................................................................................ 11

RESTORATION PLAN ................................................................................................................. 12

WESTERN SNOWY PLOVER MANAGEMENT PLAN ............................................................... 14

ACCESS PLAN ........................................................................................................................... 15

PART 2: MINOR TEXT AND FIGURE CHANGES ..................................................................... 16

2010 LRDP TABLE A.1: SUMMARY .......................................................................................... 17

ADJUSTMENT TO LRDP FIGURES .......................................................................................... 19

PART 3: COASTAL ACT CONSISTENCY ................................................................................... 19

PROPOSED PROJECT CONSISTENCY WITH THE 2010 LRDP ............................................. 19

COPR MANAGEMENT PLAN .................................................................................................. 19

TEXT AND FIGURE CHANGES ................................................................................................. 21

PUBLIC PARTICIPATION ............................................................................................................ 21

SUBMISSION OF ALL POLICIES, PLANS, STANDARDS, OBJECTIVES, DIAGRAMS, DRAWINGS, MAPS, PHOTOGRAPHS, AND SUPPLEMENTARY DATA SUFFICIENT TO ALLOW REVIEW FOR CONFORMITY WITH THE COASTAL ACT .................................................................................. 21

THE LRDP AMENDMENT’S RELATIONSHIP TO AND EFFECT ON THE OTHER SECTIONS OF THE LRDP ............................................................................................................................................. 22

ANALYSIS THAT MEETS THE REQUIREMENTS OF CCR SECTION 13511 AND THAT DEMONSTRATES CONFORMITY WITH THE REQUIREMENTS OF CHAPTER 3 OF THE COASTAL ACT .................................................................................................................................................. 22

1. NEW DEVELOPMENT ......................................................................................................... 22

2. PUBLIC ACCESS ................................................................................................................. 24

3. RECREATION ....................................................................................................................... 25

4. MARINE ENVIRONMENT ..................................................................................................... 25

5. LAND RESOURCES .............................................................................................................. 25
LIST OF APPENDICES

Appendix A: Figures 1 through 10
  - Figure 1: Location Map-LRDP Figure D.1
  - Figure 2: Vegetation Within the Field Station
  - Figure 3: Habitat Map
  - Figure 4: Field Station-Distance from ESHA
  - Figure 5: Existing Facilities and Director’s Residence
  - Figure 6: Director’s Residence and Animal Pen
  - Figure 7: Animal Pen and ESHA
  - Figure 8: Nature Center Location
  - Figure 9: Bird and Raptor Survey Polygons
  - Figure 10: Public Access Points at COPR

Appendix B: Raptor Survey Data
Appendix C: Enforcement Plan
Appendix D: Access Plan NOID Restoration Plan
Appendix E: SUN Memo
Appendix F: Updated LRDP Figures
Appendix G: LRDP Consistency Table
Appendix H: LRDP Updated Pages
Appendix I: Public Notice List and Public Notice
Appendix J: UC President’s Approval
Appendix K: LRDP EIR Addendum
INTRODUCTION

The University of California, Santa Barbara (UC Santa Barbara) has prepared this Long Range Development Plan Amendment (LRDPA) to add the Coal Oil Point Reserve Management Plan to the LRDP, correct a typographical error in Table A.1: Summary, and to correct the LRDP figures to include a small privately-owned parcel on North Campus inadvertently left off the LRDP figures.

Part 1 of this LRDP will be for the addition of the COMPRMP, Part 2 will address the minor text and figure amendments, and Part 3 covers public participation and consistency with the Coastal Act.

PART 1: COAL OIL POINT MANAGEMENT PLAN

BACKGROUND

The 2010 LRDP was certified by the California Coastal Commission in November 2013. The 2010 LRDP includes policy directly related to the COPR (or “Reserve”). Policy LU-33 requires the COPRMP be submitted to the CCC as an LRDPA within two years of certification. This LRDPA is in response to Policy LU-33.

“Policy LU-33 – Within two years of the effective date of certification of the 2010 LRDP, the University shall prepare and submit a Coal Oil Point Reserve Coastal Management Plan to the Coastal Commission as an amendment to the 2010 LRDP. No new structures shall be approved on the Reserve until the Plan is certified by the Coastal Commission.

The purpose of the Plan shall be to comprehensively identify existing and planned development, maintenance, and programs at the Reserve that are consistent with coastal resource protection under the Coastal Act and the certified LRDP. The COPR Coastal Management Plan shall specifically identify: a baseline of all existing development on the Reserve (including confined animal facilities); the development’s date of installation; permitting history; existing Reserve programs (e.g., the snowy plover management, wetland restoration, native plant species cultivation); existing maintenance operations such as
location, timing and methods of fuel modification; and status of habitat restoration activities.

The Plan shall provide a detailed description of all development, maintenance, and programs that are proposed to continue on the Reserve. The Plan shall augment the biological resource mapping (Figure F.2) effort on campus, both on and off the Reserve, based on current (within 1 year) and historic resource surveys for all areas within 300 feet of proposed Reserve development, maintenance, or management programs. The Plan shall evaluate the consistency of the proposed development and activities with the Coastal Act.”

The purpose of the COPRMP LRDPAs is to comprehensively identify existing and planned development, maintenance, and programs at the Reserve. The COPR is located on the West Campus (Figure 1)

DEVELOPMENT

EXISTING DEVELOPMENT/SETTING

Existing development at the Reserve includes buildings at the Field Station and auxiliary equipment out on the Reserve for research and education. The COPR Infrastructure Plan (COPRMP Appendix 4, 2015) describes the existing infrastructure in detail. Existing infrastructure at the Reserve includes buildings, greenhouses, utility lines, communications, culverts, fences, trails and roads, and research equipment. The buildings, greenhouses and utilities are located at the COPR Field Station on Coal Oil Point within the Reserve. The Field Station is fenced with 6-foot tall wood fence. The wood fence replaced a chain link fence and a portion of the chain link fence remains (about 1/3 of the fence is chain link). The fence does not provide official “wildlife passage” however skunks and raccoons pass under the fence. There is no outdoor lighting at the Field Station except for on the deck of the Director's Residence.

The infrastructure at the Field Station provides crucial support for operations, maintenance and programs at the Reserve. In addition to these structures, the COPR Reserve Director lives at the Field Station, as a condition of employment. The Reserve Director's residence has an adjacent fenced yard with a garden, small greenhouse and animal enclosure that are for the private use of the Reserve Director and the Reserve Director's family.

The existing buildings, size, and function at the Field Station are listed in Table 1. None of this development with the exception of the 220 square-foot greenhouse and woodcrete fence on the bluff is permitted by the CCC (COPRMP, Appendix 4: Table 1 Page 92, 2015). The area within the Field Station was occupied by a summer camp program in the 1960s. In the 60's the area was cleared of dune vegetation, then filled with 1-foot of soil, after which several rustic wood cabins were constructed over cement foundations. Water and electricity were extended from Isla Vista and a septic tank was installed at the Cliff House. The Cliff House was part of the summer camp and had a kitchen and dining facility and is located on the bluff edge at Coal Oil Point and is not part of the Reserve. The summer camp grounds were landscaped with Acacia longifolia, an exotic invasive shrub that grew quickly by seeds and spread to native areas in the Reserve displacing native dune vegetation.
The Reserve has progressively removed all the invasive Acacia over the last 10 years. Acacia removal started in 2000, around the eastern dunes (about 6 acres), then in most of the Reserve (about 2 acres) (NOID 4-07), and lastly in the Field Station. All Acacia removal is associated with restoration and is now eradicated from the Reserve and Field Station. In its place, native species were planted.

Several Monterey Cypress were planted around the point about a century ago as part of the Campbell Ranch and are now senescing. Two of them were removed from the parking lot area in the last five years. One tree was removed because, after a heavy storm, it began to lean over a parking area. The other tree became rotten in the middle and split in half, after which it was in danger of falling across the parking area and onto a building. Due to the importance of trees as habitat, the Reserve is planting approximately 150 native oak trees in anticipation to replace the function of these and other exotic trees.

Vegetation within the Field Station is mainly fruit trees and native or non-native non-invasive landscape plants. The Reserve Director has planted a few natives within the Field Station such as California sunflower, California poppy, and Frankenia. There is a plastic pond with Scirpus californicum. Quail bush and lemonade berry were planted along the fence for screening. There is a sycamore tree on the north side of the Director’s Residence and a willow, also adjacent to the Residence (both planted). Native landscaping/trees were planted at the Reserve Field Station in accordance with NOID 2-00 which permitted landscaping/habitat enhancement (plant approximately 250 new native trees/shrubs in the vicinity of the Caretakers Unit). The proposed and permitted native trees were not planted because the Field Station is too windy and the trees would not survive. The only shrubs that survived the wind is quail bush and lemonade berry. Vegetation within the Reserve Field Station is shown in Figure 2. The Reserve Field Station is currently surrounded by Southern Coastal Bluff Scrub and Southern Foredune (planted in in place of the Acacia). The Field Station fence is more than or about 100 feet from any ESHA (dune and coastal bluffs). See Figure 3 showing the Reserve habitats and Figure 4 for distance from ESHA.

Soils within the Field Station are sandy and rainwater/stormwater is able to percolate and infiltrate at the site. Soils are more clay-like towards the ocean bluffs where water generally sheet flows off the bluff. There are no stormwater outfalls or infrastructure at the Field Station or within the vicinity and all water sheet flows off the site or infiltrates. The Field Station is relatively undeveloped and vegetated so much of the stormwater stays on site.

The COPR (including Devereux Slough) was designated as a Reserve in 1973. Since its inception in 1973, the Reserve housed a caretaker family in a mobile home, and used the remnant sheds from the summer camp as office and storage space. In 1999, the 1960s era mobile home was deemed not safe as a residence. The trailer was condemned in 1999 and replaced with a modern mobile home. However, the new mobile home was moved away from the original trailer site which was next to the beach entrance, to separate the residence from view of the main public access way.

The Field Station including the Director’s Residence uses approximately 30 hundred cubic feet (hcf) (22,088 gallons) of potable water per year (an average of 2.5 hcf/month [1,870 gal/month]) (UCSB Facilities Management Fiscal-October 2014 Invoice). Potable water is supplied via a water line connected from the West Campus Faculty Housing area to the COPR Field Station. A dedicated meter is installed to track (and pay for) water use.
For a detailed description of each development see pages 87 through 99 (COPRMP Appendix 4) of the COPRMP. Figure 5 shows the location of each development.

TABLE 1 - List of facilities at the COPR field station on Coal Oil Point.

<table>
<thead>
<tr>
<th>Building</th>
<th>Size (sq. ft.)</th>
<th>Function</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director’s Residence</td>
<td>1,246</td>
<td>Residence for Reserve Director’s family</td>
<td>Replacement in 1999 for old condemned – Not permitted with a NOID. Manufactured home.</td>
</tr>
<tr>
<td>Staff Office</td>
<td>416</td>
<td>Office for Reserve staff; researchers, volunteers, and interns</td>
<td>Built in the 1960’s as a storage shed for summer camp-prior to Coastal Act.</td>
</tr>
<tr>
<td>Plover shed</td>
<td>120</td>
<td>Support of snowy plover management program</td>
<td>Installed in 2008 on an existing concrete slab that was the foundation for an old summer camp cabin</td>
</tr>
<tr>
<td>Shed #1</td>
<td>224</td>
<td>Storage</td>
<td>Old cabin was replaced with new shed in 2014 on original concrete slab</td>
</tr>
<tr>
<td>Shed #2</td>
<td>224</td>
<td>Storage</td>
<td>Old cabin was replaced with new shed in 2014 on original concrete slab</td>
</tr>
<tr>
<td>Shed #3</td>
<td>480</td>
<td>Workshop</td>
<td>Old cabin was replaced with new shed on original concrete slab in 2014</td>
</tr>
<tr>
<td>Garden shed</td>
<td>120</td>
<td>Storage of restoration supplies</td>
<td>Installed in 2008 on a concrete slab that was the foundation for an old summer camp cabin</td>
</tr>
<tr>
<td>Docent Office</td>
<td>300</td>
<td>Office for docent program staff &amp; volunteers</td>
<td>NOT located on the Reserve. Built in the 1940’s.</td>
</tr>
</tbody>
</table>

Additional infrastructure

<table>
<thead>
<tr>
<th>Building</th>
<th>Size (sq. ft.)</th>
<th>Function</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greenhouse - plant nursery</td>
<td>220</td>
<td>Grow native plants for research &amp; restoration</td>
<td>Built in 2013 - NOT on a permanent foundation (NOID 2-00)</td>
</tr>
<tr>
<td>Shade hut</td>
<td>900</td>
<td>Grow native plants for research &amp; restoration</td>
<td>Temporary structure with metal poles &amp; shade cloth roof</td>
</tr>
</tbody>
</table>
### Septic system
- **Residence yard** 1,500 gallons
- Serves the residence
- Installed in 2000 to replace old system located near beach entrance that failed.

### Greenhouse – residence yard
- **240**
- Used by Reserve Director’s family
- Built in 2000 – sits on a concrete pad

### Animal pen – residence yard
- **33 ft x 65 ft** (2,145 sf)
- Used by the Director’s family for their animals
- Temporary structure

### Woodcrete fence on bluff edge
- **910 linear ft**
- Protect Reserve and bluff edges
- Replaced chain link fence in 2012 (COPR Access Plan NOID 1-10)

### Wood fence around field station
- **245 linear ft completed**
- Protect field station buildings
- Replaced original chain link fence in 2012. (120 ft to be completed in future)

### Parking area
- Parking space for reserve users
- Gravel surface

### AUXILIARY EQUIPMENT FOR RESEARCH AND EDUCATION

Research equipment to measure environmental parameters is routinely used and maintained by researchers at the Reserve. Current equipment includes:

**Weather stations:** The Reserve has two weather stations, both owned and maintained by research groups. A large weather station owned by NOAA provides weather data online via satellite. The NOAA station is part of a large network of identical stations established throughout the United States to monitor global climate change. A smaller station is owned by the Geography lab at UCSB and is used by researchers and students to learn techniques for environmental monitoring.

**USGS earthquake antenna:** The antenna is owned & operated by UCGS and is used to monitor ground disturbances caused by earth movement.

**Internet radios:** The Reserve has three small radios that are located throughout the Reserve. The radios create a mesh for internet connectivity that is used by researchers when they are working out on the Reserve and by remote cameras set up to monitor Reserve sites.

**Santa Barbara County Air Pollution Control District (SBAPCD) air monitoring equipment:** Air monitoring equipment was installed by SBAPCD to monitor air quality from operation of the Ellwood Marine Terminal (EMT) oil facility. The EMT is currently decommissioned and awaiting approval of a demolition and reclamation permit from Santa Barbara County. The air monitoring station will be dismantled when the EMT demolition and restoration project is complete. A concrete pad and pole will likely remain for use by COPR.
ACCESS AND RESERVE USE

Access to the Reserve Field Station and parking area are from Slough Road on West Campus and through a closed gate with requiring an access code. The gate reduces the amount of traffic to Coal Oil Point by the public who are “checking the surf” or looking for public parking. There is no public parking at the Reserve Field Station. The Reserve Director’s phone number is posted on the gate for American Disabilities Act (ADA) parking access at Coal Oil Point (outside the Reserve boundary). There is currently one or two ADA parking space at the Cliff House at Coal Oil Point. ADA parking is available in the Reserve Field Station parking area for Reserve staff, volunteers, and visitors. There are about 15 parking spaces at the Field Station and an average of 10 and up to 25 vehicles Park in the Field Station parking area per day. Vehicle parking is for the Reserve Director plus two staff, researchers, students, and public use (volunteers (docents and restoration), and visitors to the Reserve. Large groups of students (K-12) visit the Reserve in a large bus or van. The buses drop children off and come back for them at the end of the tour. When there are more vehicles in the parking lot than the 15 spaces people double park. This usually occurs when there is a tour and this process works since everyone leaves at the same time and no one is blocked in.

Access to the Reserve is from Sands Beach on the south or Veneco Road on the north through the Dune Pond Trail (on foot) or through a dirt road into the Reserve which accesses the weather stations and SBCAPCD air monitoring equipment. Vehicle access isn’t allowed through the Reserve and access is primarily by foot.

The total Reserve use is between 6,000 and 9,000 User Days (UD) per year (approximately 16 to 25 people per day). On weekdays, the Reserve staff population is 3 staff (including the Reserve Director). Typically there are about 1,000 UD (3 per day) for researchers and about 3,000 UD (8 per day) for college classes. Most students come in vans with about 12 students per van. There are about 5,000 UD (14 per day) for public use. Most of this use is by volunteers helping with the plover program and restoration. Most of them drive to the Reserve in single cars. People visiting for tours come with cars (once a month about 15 cars). K-12 classes come on buses, maybe 20 buses per year.

FACILITY AND INFRASTRUCTURE MAINTENANCE

The Reserve will retain and maintain all existing infrastructure located at the Reserve, including all buildings, and does not propose to construct any new buildings within the Reserve boundary. Fuel modification within the Field Station consists of trimming vegetation out to a minimum of 30 feet from the edge of the structures, once a year, in accordance with the Fire Code. Vegetation is never “cleared” or removed for fire prevention. Vegetation around structures is pruned by hand. Roads and infrastructure are maintained by UCSB Physical Facilities Department as part of routine campus maintenance projects.

PLANNED DEVELOPMENT

Planned development at the Reserve Field Station includes upgrading the existing septic system, maintaining and existing/having an animal pen for animal keeping, replacing 120 feet of old chain link fence with wood, enclosing existing concrete slab (224 square-foot) with a 6-foot wood fence to store materials, renovate a UCSB-owned art studio to function as a garage, and renovate an existing building on Devereux South Knoll for a Nature Center. Planned
development at the Reserve Field Station is listed on Pages 90 and 91 of Appendix 4 of the COPRMP.

There is no future building development proposed on the Reserve however future requests for installation of temporary research equipment and instrumentation may be granted.

CONFINED ANIMAL FACILITY AND ANIMAL KEEPING

At the Reserve Director’s Residence there is currently an uninhabited 2,145 square-foot animal pen once used to keep goats. After the University was given a notice of violation (V-4-14-0027) for grazing the goats without a permit in April 2014, the goats were moved off the Reserve and off campus in May 2014.

The existing animal pen was installed in 2005 and is made with a fence type called “cattle panel fence.” Each panel is made of metal and is 5 feet high by 16 feet long. The panels are secured by T-posts and are easily moved around and re-arranged. The fence for the pens was installed without grading or vegetation removal and the panels are tied to T-posts pounded into the ground manually. No lighting was installed for the animal pen. There were about 35 goats total in the animal pen (including newborns) up to May 2014 when they were moved out of the Reserve Field Station.

Figure 6 shows the Director’s Residence and the Animal Pen (Blue line within Residence Yard). Figure 7 shows the location of the animal pen in relation to adjacent Environmentally Sensitive Habitat (ESHA). Since the Reserve Field Station was developed as a summer camp in the 60’s native vegetation is not present within the Field Station with the exception of native vegetation planted by the Reserve Director as landscaping. No native vegetation was cleared for the animal pen and the animal pen is over 100 feet from any designated ESHA.

Since there are currently no animals kept at the Field Station, there is currently no manure management program needed. While the animals were present, the manure was removed from the pen twice per week and composted with plant matter to produce potting soil used to propagate native plants in the COPR greenhouse. This practice would continue when a permit to have a confined animal facility and animal keeping is approved through the CCC. The Reserve Field Station is surrounded by Southern Coastal Bluff Scrub and Southern Foredunes (Figure 2). There are no wetlands within vicinity of the Reserve Field Station and the ocean bluffs are over 100 feet away. There is no water used to wash down the animal pen. The only water used would be consumed by the goats – approximately 10 gallons per day. Adult goats drink on average 2 liters per day. The maximum daily consumption would be 20 liters for adults and 10 liters for the kids. Water quality would not be impacted from runoff through the Field Station to ESHA. Potable water use described above in existing development includes 6 months of time where the goats were at the Field Station – until May 2014 when the goats were moved off site. Water use data does not show a significant change in water use with or without the goats.

The LRDPA would allow up to 30 goats (a mix of no more than 10 adults and 20 newborn) to be kept at one time in the animal pen. The goats would not be let on the Reserve or out onto West Campus Mesa to graze. The goats would be exercised on the road between the Field Station and the entry gate at Slough Road.
The LRDP would edit the Reserve Overlay land use designation to allow a Confined Animal Facility and Animal Keeping at the Reserve Director’s Residence. The following changes are proposed (underline and italics):

Allowed uses within the Reserve Overlay shall be limited to:

- Environmental interpretation/educational displays
- Fences, signs, or other wildlife permeable, natural barriers to protect public safety, manage open space areas, and direct public access
- Habitat creation, restoration and/or enhancement activities, including vegetation management for habitat restoration purposes consistent with Policy ESH-12
- Parking for Reserve personnel and volunteers
- Public coastal access, including public coastal access trails, parking, benches and bicycle racks
- Reserve Director’s residence including an animal confinement facility for keeping animals in accordance with Policy LU-34 (c).
- Reserve Field Station facilities such as workshops, storage sheds, offices, greenhouses and shade hut
- Weather stations, observation blinds, or other similar small structures to enhance the Reserve’s objectives as a natural study area

New LRDP Policy:

**LU-34 (c)**

A Confined Animal Facility (CAF) and Animal keeping at the Reserve Director’s residence shall require a Notice of Impending Development. The CAF shall house no more than 10 adult animals, up to 20 youth or newborn animals and not to exceed 30 total animals at any time. A manure waste management plan shall be required. Animal grazing is prohibited on the Reserve or in adjacent Open Space areas without a grazing plan approved by the Coastal Commission.

A Notice of Impending Development will be prepared and submitted for the Confined Animal Facility and Animal Keeping at the Reserve Director’s Residence. No grazing of animals on the Reserve or in adjacent Open Space areas is proposed at this time.

**NATURE CENTER**

The COPR has been raising money through grants to renovate a 5,390 square-foot building on the South Knoll of the Devereux property. The Reserve staff will occupy the renovated building (Building 7060) on the Devereux campus for use as the Reserve headquarters and education and conservation center. This facility will not replace existing infrastructure at the Reserve Field Station, and will provide additional space that COPR has long-needed to support its current research, education and administrative programs, and to provide opportunities for enhanced programs in the future. Figure 8 shows the location of the new COPR headquarters and Nature Center.

The goal of the proposed Nature Center is to facilitate environmental education and research for all age groups by supporting research, classes, tours, volunteerism, and science. Devereux Building 7060 is 5,390 square feet with 2 wings, with sufficient space to be the education center for the Reserve and to accommodate all of the Reserve’s space needs.
The building will require substantial renovations to meet current building codes and to provide the facilities needed by the Reserve to support current programs and provide for future growth. For example, the walls need to be reinforced to comply with seismic regulations; all doors and ramps will need to be replaced for ADA compliance, and hazardous materials need to be abated. The building would not be expanded beyond its current footprint.

The building was originally designed as a dorm with several small apartments and bathrooms. Proposed renovations will remove bathrooms, combine 2 small rooms into a larger room, renovate other rooms to create a large event space, a classroom, a small laboratory, a library, public bathrooms, staff offices and a kitchen. The building will provide space to support the existing Reserve programs, as well as provide opportunities to attract and develop new programs, including collaborative projects with other non-profit organizations.

Reserve staff will be working in the Nature Center but will be parking at the Reserve Field Station lot. The researchers and volunteers will also continue to park in the Reserve Field Station lot. The buses and student vans, and the people coming on tours will park at the Nature Center in the Devereux parking lot.

**UCSB AND SURROUNDING JURISDICTION DEVELOPMENT-POTENTIAL IMPACTS ON THE RESERVE**

The continued growth of the surrounding urban areas in the City of Goleta and development on the UCSB campus will potentially cause additional impacts to the natural resources of the Reserve. The Reserve and the UCSB NRS will work with the University and the entities that develop and approve new projects in the area to ensure that the potential impacts to COPR are mitigated appropriately. The COPR Reserve Director and the UCSB NRS administration will consult with the University to ensure that potential impacts are considered and appropriate mitigation measures are in place. In the case of University development projects, the University will bear the cost of the evaluation of the impacts and implementation of required mitigation measures which may include dedicated enforcement, Reserve staff support, habitat protection and/or restoration. When development is by non-University stakeholders, COPR and the UCSB NRS will consult with the University to engage the stakeholders on behalf of the Reserve to evaluate impacts and implement mitigation measures as needed.

**PROGRAMS**

Existing Reserve programs include Reserve Users and Visitors, Habitat Conservation, Stewardship, Administration, and Infrastructure and Facilities Program. Three major Reserve Programs in the Conservation and Stewardship programs, respectively, are described in detail in the COPRMP in the Appendices: Restoration Plan Access Plan (Appendix 3), Snowy Plover Management Plan (Appendix 2), and Access Plan (Appendix 1) (COPRMP 2015).

Existing biological resources at the Reserve are shown in Figures 2 and 9. All of the information presented here is directly from COPRMP Appendix 3, Restoration Plan and everything in that plan is incorporated by reference here.
RESTORATION PLAN

The COPR Restoration Plan was approved by the CCC in 2008 (NOID 4-07). Approved Habitat Restoration at COPR included restoration of exotic grasslands to native coastal scrub and grassland habitat. Restoration of approximately 5 acres of phased non-native tree and shrub removal including: (1) the removal of non-native trees and shrubs below 20 feet in height; (2) limb removal of trees over 20 feet tall (limbs can only be removed up to 6 feet from the ground); and (3) removal of non-native trees over 20 feet tall once they die of natural causes. The 22 non-native trees that will be removed were dispersed along the western and southeastern portion of Devereux Slough, generally within 300 meters of snowy plover habitat on Sands Beach. The approval included restoration immediately after non-native trees were removed, native vegetation, including coastal scrub, shrubs, and grasses, will be planted in areas within 300 meters of Snowy Plovers and Least Terns nesting on the beach. Trees removed farther than 300 meters from the beach will be replanted with native coast live oaks at a ratio of 1:1. The restoration also includes removal of exotic grasses using manual methods including hand weeding and solarization and replanting with native species over a 45 acre area. No heavy equipment was allowed to be used.

Completed restoration activities at COPR are detailed in the COPRMP Appendix 3 in Figure 1 and Table 1.

Planned restoration activities include replacing iceplant with dune scrub and exotic annual grasses with oak woodland and grassland/coastal scrub mix areas. Figure 2 in Appendix 3 shows the areas that will be restored in the future.

COPR also plans to slowly replace exotic trees with native species such as elderberry and coastal live oak. The Restoration Plan (COPRMP Appendix 3) Table 2 includes a list of trees at COPR and their condition. All protocol in LRDP Appendix 2, Tree Removal and Trimming Program will be followed.

Restoration: Maintenance on the Reserve

Maintenance at the Reserve primarily consists of mowing, weed pulling, solarization, herbicide, planting by hand, and watering.

The most important exotic species (other than trees) that have been removed or are still being removed include acacia, myoporum, tamarix, fennel, thistles, harding grass, pampas grass, german ivy, iceplant, and annual grasses.

The removal of small herbs and grasses is primarily accomplished by hand-removal, mowing, solarization, and/or herbicide application (in the case of harding grass and fennel). There is no grading or excavation used, except for the holes made to insert the seedling in the ground. The soil is not tilled. Exotic perennial shrubs and trees are cut at the base and herbicide (Glyphosate) is applied on the base to kill the roots so they do not sprout again. Whenever possible, exotic trees and shrubs are chipped and left on site as mulch.

An annual exotic grassland was mowed in 2012 on the northwest corner of the reserve to control annual grasses. In the following year, a number of Lupinus bicolor and California poppy grew in the mowed area. Mowing with a hand mower or small tractor is now used routinely to control exotic grasses and annual weeds.
An accidental fire occurred in the western portion of the Reserve in June of 2014 and burned 20 acres. By September of 2014, several burned areas had already grown back with native vegetation, including the edges of the dune pond (photos on the right). Such disturbances (mowing and fire) had positive effects on the control of weeds and the establishment of native vegetation. Prescribed disturbances such as mowing, raking, and fires, may be used in the future for restoration in the reserve, when appropriate.

**Restoration: Revegetation on the Reserve**
The plant species used in restoration depends on habitat and soil type. The proportion of each plant species and how they are distributed spatially are characteristics of each plant community, which the Reserve staff seeks to replicate in restoration projects. Areas of the reserve that have not been disturbed in the past have been used as templates for the restored sites.

Plants for the re-vegetation are propagated in the reserve’s greenhouse from seeds collected in the reserve. Plant species that don’t occur in the Reserve but occur at similar habitats nearby, are sometimes introduced to the Reserve, under the assumption that they were extirpated from the Reserve by past human activities.

Planting is done by staff and volunteers. Watering is done as needed using a portable water tank pulled by a truck and a portable irrigation system. Approximately 1,000 gallons of water is used per week in the dry season. Mulch is applied during planting to control weeds and maintain soil moisture.

Monitoring using transects, quadrats, and photos is done before and after each restoration project. A record of the number of each plant species planted is maintained for all restoration projects.

The Reserve maintains a GIS map of the restored areas and description of each restoration project (COPRMP, Appendix 3, Table 1). Most restoration projects are conducted as funds become available. Habitats near wetlands have been the focus of the last 20 years. The future areas to be restored are mostly grasslands and coastal scrub (COPRMP, Appendix 3, Figure 2).

The Reserve contains several eucalyptus and cypress trees that were planted approximately 70 years ago (COPRMP, Appendix 3, Figure 3, Table 2). The Reserve will slowly replace these exotic trees with native species such as elderberry and coastal live oak because the native trees provide a more valuable habitat for many bird species. For example, oaks produce acorn which is eaten by many species, including Acorn Woodpeckers. Elderberries produce abundant berries that are eaten by frugivorous birds. They also support a number of insect species that are eaten by birds.

In addition, exotic trees can be detrimental to the Reserve’s rare ecosystem when planted in the wrong place. For example, eucalyptus is known to remove ground water and can dry wetlands. Trees near the beach and the slough attract raptors and crows which have been observed to prey on threatened and endangered birds (Western Snowy Plovers and California Least terns). The beach and mudflats are typically safe habitats for shorebirds to nest as they allow a wide view of the surrounding giving them enough time to escape from an approaching predator. When trees are planted near these habitats, it impacts shorebirds by attracting birds of prey. The shorebirds do not have time to escape from a bird of prey hiding and observing from a nearby tree. At the Reserve, crows have been observed eating plover eggs and chicks,
Great Horned Owls ate adult Western Snowy Plovers, and Red-tailed Hawk ate plover chicks and mistakenly took away a California Least Tern decoy. Thus, the removal of large exotic trees from a 500 m zone from the beach is a critical step to protect these listed shorebird species.

Trees are important habitat for birds and they may have occurred in the northern part of the Reserve and the North Campus Open Space before human disturbance in the early 1900’s. The Reserve’s goal is to increase the current canopy area occupied by exotic trees but use native species and at appropriate locations instead. To do this, the exotic trees will be replaced with native trees at a ratio of at least 1:1. Exotic trees will be removed gradually and removals will be timed to avoid disturbance to nesting birds (only between September 1 and February 15). The gradual removal will allow the birds of prey to become used to the change in habitat and find other trees to nest. Trees are actively being used (or have been used in the last 2 years) as a nesting site for raptors, Great Blue Herons, egrets, or cormorants, will not be removed.

A raptor survey was performed in February 23 2015, March 17 2015, and May 20 2015. Survey data is attached (Appendix B). No raptor nests were observed in the Reserve trees or the trees surrounding the EMT oil tanks in these surveys. According to Mark Holmgren, this has not been a period in which a lot of raptors have been observed. It was reported a pair of raptors in the north finger bred successfully this summer and there was other activity (some birds practicing nest building) on the south side of the south finger in late summer. American Kestrels did not breed this year on the south side of the Elwood Marine terminal. There has been no evidence of Cooper’s Hawks or Red-shouldered Hawks breeding on the Reserve this year (2015). Great horned owls have been observed over the last six months in the Reserve and surrounding areas. There has been no observations of them nesting (Homlgren 2015).

These surveys were part of a bi-monthly bird survey that started in 2015 and will continue in the future. One goal of the sensitive bird surveys is to learn if climate change will change the bird distribution at COPR.

Figure 10 is a map showing the polygons that are surveyed, with the dots being the location of the birds. Only the areas in the polygons are sampled, not the whole Reserve. Note that the Red Tailed Hawk was observed flying, not perching.

If a tree or shrub needs to be removed for safety reasons and it is during nesting season, a bird nesting survey will be performed by a qualified biologist, at a minimum one week before removal or trimming. If active nests are located in the survey, a 250-foot buffer will be placed around the nest until the young have fledged. A qualified biologist will be on site during the entire duration of construction to ensure protection of any sensitive species encountered during the course of the project. All tree trimming and removal will follow applicable LRDP Policies and protocol in LRDP Appendix 2, Tree Trimming and Removal Program and a Notice of Impending Development will be submitted the CCC.

**WESTERN SNOWY PLOVER MANAGEMENT PLAN**

The Snowy Plover Management Plan (SNMP) is included in the COPRMP as Appendix 2. See Appendix 2 for a full description and status of the program. The SPMP was last permitted by
the CCC in 2008 (CDP-4-08-007) and the program has not changed. The CDP was valid for five years and a new permit is required. A CDP application will be submitted to the CCC.

The SPMP included as Appendix 2 of the COPRMP provides the status of the Snowy Plover program. According to the data, there were increases and decreases in the number of nests that hatched since 2008. 2014 levels are the same as 2008 level (see Figures 8, 9, and 10 in Appendix 2 of the COPRMP). There were about 20 nests that hatched in 2008 and about 40 in 2010. In 2014 there were 20 nests. The drop in nests hatched was mostly due to skunk predation on eggs (Sandoval 2015 personal communication). Drops in chicks fledged in some years are from chick predation by birds of prey. There have been a few observations of red tailed hawks catching chicks.

Some recent changes could explain why there are fluctuations in the snowy plover population at Sands Beach. The beach has eroded a lot in the last 3-4 years (between 2011 and 2015) and there is little room between the ocean and the dunes. This forces people to be near the fence, and the area between the fence and the dunes is narrow to begin with. This is a challenge for the adults incubating because they have to leave the nest frequently. Also this is a challenge for the chicks because they run up to the dunes to escape from people and they can't climb it very well. The place that the chicks have been most successful is by the slow mouth where there is more area away from people. There has been an increase in the number of people using the beach and may have increased disturbance rates.

An enforcement program was initiated by UCSB Police and the COPR in March 2009. UCSB Police provided a regular presence at the Reserve (about 13 hours per week) for a 3 month period. A press release went into local papers announcing the new patrols with the purpose of warning beach users to keep their dogs on leash. Regulatory signs have been posted since 2001.

After 3 months of implementing the enforcement plan, the Reserve staff compared the number of unleashed dogs with enforcement with the same months in the previous year, before the enforcement plan was implemented. The data showed there is not much difference in the number of unleashed dogs with the proposed enforcement plan (Appendix C - 2009 Enforcement Plan Summary). About 60 percent the dogs at Sands Beach are leashed (see Figure 3 in Appendix 2 of the CORRMP).

ACCESS PLAN

The COPR Access Plan is included in the COPRMP as Appendix 1 and was permitted by the Coastal Commission in 2010 (NOID 1-10). There is no proposed new development than that which was permitted in NOID 1-10.

The Access Plan as approved by the CCC has been fully implemented. A Final Restoration Plan for the access improvements was submitted to the CCC on July 12, 2012 (Appendix D). No monitoring reports have been submitted to the CCC however, restoration goals such as a ‘green fence’, closing and restoring unapproved trails, and eradication of iceplant in some locations have been achieved.

Implementation of the Access Plan provided appropriate forms of public access while protecting sensitive habitats. For example, in 2000, the Reserve created 1,500 feet of new interpretive trails along the Devereux Slough margin (NOID 2-00) to promote environmental
education and increase pedestrian safety while planting the margin of the slough with native vegetation. Benches and interpretive signs have enhanced the public’s experience and their understanding of the Reserve’s fragile ecosystems.

The public can access the beach from West Campus, Ellwood Mesa, and from 3 access points on the bluffs; 1) at the eastern boundary of the Reserve near the Cliff House (Sands Beach/Access B), 2) at the southern terminus of the Dune Pond trail, and 3) at the western boundary of the Reserve adjacent to Ellwood Bluffs (Access D) (Figure 11). The eastern bluff access point near the Cliff house has been improved with a new split rail fence. There is a control gate that restricts access to pedestrians and inhibits access by motorized vehicles, bicyclists and equestrians. Visitors proceed down the cliff along a trail that follows the edge of the foredunes and reaches the beach near the plover area.

In June of 2011, an electric gate was installed at the main entrance to the Reserve. The small parking area (up to 15 cars) inside the reserve is restricted to approved Reserve users. Restricting the parking access has helped limit inappropriate recreational use of sensitive habitats on the Reserve. Public parking has been created on the Devereux Campus.

Foot traffic and leashed dogs are allowed on the beach except within the dry sand areas of the plover roost and nesting areas, which are designated by a post and rope fence and signs (see Snowy Plover Management Plan, COPRMP, Appendix 2). The post and rope fence surrounding the roost area in winter is extended during the breeding season to protect nesting birds (4-08-007-CDP). Horses are not allowed on the beach to avoid disturbance to plovers and other shorebirds. A beach corridor is provided so that lateral movement of people along Sands Beach is not impaired. Docents staff the beach area and provide information to the public about plover protection measures. The Delta path has been permanently closed to reduce foot traffic through the plover roost as per the Coastal Commission decision of November 16, 2001 (NOID 1-01). Group recreational activities that may cause disturbance to shorebirds, such as Frisbee, football, kite flying, and surf contests, are not allowed on the beach. The Reserve works with the campus police to achieve compliance with restrictions on alcohol intoxication and prohibitions of fires and camping in the Reserve (including the beach area), and to reduce vandalism, litter and trespassing. The Reserve calls the campus police for enforcement of the Santa Barbara County leash ordinance. Lack of compliance with beach regulations that causes harm to the Reserve’s natural resources, including snowy plovers, will cause access on Sands Beach to be re-evaluated and additional measures will be put in place to ensure protection of the Reserve and the plovers.

When there is a conflict between conservation of natural habitats (or research areas) and access, access will be modified to accommodate the conservation priorities. The Reserve will manage internal trails and access within the Reserve boundaries to protect natural resources and research projects. The Reserve retains the right to request termination of an activity that harms natural resources, including wildlife. Surf contests and try-outs and launching of kite surfing from the beach are not allowed because of the great disturbance they cause to wildlife.

**PART 2: MINOR TEXT AND FIGURE CHANGES**
LRDP Table A.1 summarizes the changes from the 1990 LRDP to the 2010 LRDP in enrollment, faculty and staff, building space square feet, housing, play fields, and parking spaces. In response to negotiations with the organization Sustainable University Now (SUN) Table A.1 was revised to reflect the desires of SUN depending on what the outcome of the CCC certification would be. Inaccurate text was inserted into the text of the table and the amendment will correct the inaccurate text.

This LRDP Amendment proposes to correct parking space text errors in Table A.1: Summary, on Page A-4 so that the information is accurate.

The following is an excerpt from the SUN agreement:

2.2 Parking. UCSB shall reduce the amount of automobile use by faculty, staff and students to and from campus by reducing the number of total trips, herein referred to in this Article as “vehicle trips”.

UCSB shall implement the following measures as a means of accomplishing the above vehicle trip reduction commitment:

a. Reduce total proposed future parking availability on campus by 650 parking spaces (from 14,230 to 13,580 spaces) exclusive of parking associated with Coastal Access mandated by the Coastal Commission, on the condition that the reduction is authorized by the California Coastal Commission and a residential parking permit program is implemented by the County of Santa Barbara for Isla Vista.

b. Strive to meet the “stretch goal” of reducing overall future parking by an additional 1,000 spaces below the number set forth in Section 2.2.a of this Agreement from 13,580 to 12,580 spaces or, in the event an Isla Vista residential parking permit program is not implemented or the Commission does not support or otherwise approve a 650 space reduction in future parking availability proposed in the 2010 LRDP, from 14,230 to 13,230 spaces.

The underlined areas in the excerpt from the SUN agreement show where the text became inaccurate. The 14,230 in the sentence in paragraph (b.) (double-underlined) refers to what the parking supply would be if the CCC did not agree to the reduction in paragraph (a.) (a reduction of 650 spaces). Since the CCC agreed to the 650 reduction in parking spaces, the sentence “or the Commission does not support or otherwise approve a 650 space reduction in future parking availability proposed in the 2010 LRDP, from 14230 to 13,230 spaces” in paragraph (b.) is no longer needed. The confusion came in November 5, 2014 memo from SUN to the CCC where they still included this as a footnote since they didn’t know if CCC would agree to the reduction or not (SUN Memo attached in Appendix E).

The LRDP text edit will delete the last 5 words (“or 13,230 spaces if not”) in the Total box in the Parking Spaces row in Table A-1, and end the sentence after “adopted.”
<table>
<thead>
<tr>
<th></th>
<th>Current</th>
<th>2010-2025 LRDP</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Enrollment</strong>¹</td>
<td>20,000 students</td>
<td>5,000 additional students at 1% per year</td>
<td>25,000 students</td>
</tr>
<tr>
<td><strong>Faculty and Staff</strong></td>
<td>1,054 faculty</td>
<td>336 additional faculty</td>
<td>1,400 faculty</td>
</tr>
<tr>
<td></td>
<td>3,631 staff</td>
<td>1,400 additional staff</td>
<td>5,031 staff</td>
</tr>
<tr>
<td><strong>Building Space SF</strong></td>
<td>2.7 M. ASF / 5.4 M. GSF²</td>
<td>1.8 M. additional ASF / 3.6 M. GSF</td>
<td>4.5 M. ASF / 9 M. GSF</td>
</tr>
<tr>
<td><strong>Housing</strong></td>
<td>6,652 bed spaces</td>
<td>~4,800 net additional bed spaces</td>
<td>~11,450 single student bed spaces</td>
</tr>
<tr>
<td></td>
<td>553 student family units</td>
<td>~200 net additional student family units</td>
<td>~900 student family units</td>
</tr>
<tr>
<td></td>
<td>+151 student family units³</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>65 faculty units</td>
<td>~1,800 additional faculty and staff units</td>
<td>~2,000 faculty/staff units</td>
</tr>
<tr>
<td></td>
<td>+161 faculty units⁴</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Play Fields</strong></td>
<td>26 acres</td>
<td>Approximately 2.5 additional acres</td>
<td>29 acres</td>
</tr>
<tr>
<td><strong>Parking Spaces</strong></td>
<td>6,700 spaces (non-housing)</td>
<td>5,100 spaces replaced</td>
<td>13,580 total spaces.</td>
</tr>
<tr>
<td></td>
<td>3,880 constructed or planned (housing)</td>
<td>3,000 net additional spaces constructed⁵</td>
<td>The University will also strive to reduce to 12,580 total parking spaces if an Isla Vista parking program is adopted, or 13,230 spaces if not.</td>
</tr>
<tr>
<td></td>
<td>10,580 total spaces</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

¹ Three-quarters on-campus average head count

² Assignable Square Feet (ASF) describes the amount of space between wall surfaces that constitutes the area required for a given program; ASF does not include corridors, restrooms, building support spaces, and structural elements such as walls and columns.

³ Pending the completion of Sierra Madre housing

⁴ Pending the completion of North Campus housing

⁵ The 650 space reduction in net additional spaces constructed shall be to non-housing spaces only, i.e. commuter parking.
ADJUSTMENT TO LRDP FIGURES

An error was made in drawing the boundaries of a privately-owned residential-zoned property adjacent to the North Campus Open Space/North Campus-Sierra Madre Apartments project. The LRDP Figures are revised to show the private property.

Boundary revisions to add the private property into the North Campus would be made to LRDP Figures B.6 (1990 Certified LRDP Land Uses), B.7 (Existing Built Environment), B.8 (Open Space), B.9 (UCSB Campuses), B.10 (2010 Existing Coastal Access, D.1 (Land Uses), D.2 (Land Use Overlays), D.3 (Development Areas), D.4 (Building Heights), E.1 (Vehicular Circulation & Parking), E.2 (Bicycle Routes), E.3 (Trail Routes), E.4 (Coastal Access Program), F.1 (Open Space Areas), F.2 (Existing Biological Resources), F.3 (Restoration Areas), F.4 (Scenic & Visual Resources), and F.5 (ESHA Buffers).

LRDP Figure F.2 (Existing Biological Resources) has also been updated to include updated biological resource surveys at COPR.

These updated figures are attached in Appendix F.

PART 3: COASTAL ACT CONSISTENCY

PROPOSED PROJECT CONSISTENCY WITH THE 2010 LRDP

COPR MANAGEMENT PLAN

The COPR is designated as Open Space with Reserve Overlay. The Reserve Field Station is within the Reserve Overlay land use designation and also is designated as Academic Uses. All of the programs and development within the Reserve and Field Station are compatible with these land uses with the exception of a confined animal facility and animal keeping. The LRDP will require an amendment to the Reserve Overlay land use designation to allow a confined animal facility and animal keeping at the Reserve Director’s Residence within the Field Station.

A LRDP Consistency Analysis Table is included with this submittal (attached in Appendix G).

As described above in the “Background” section, LRDP Policy LU-33 required the COPRMP to be added to the LRDP as an amendment.

The COPRMP in its entirety would be added to the 2010 LRDP as Appendix 5. The LRDP Table of Contents would be updated and LRDP Page B-23, under the Coal Oil Point Management Plan heading, would be updated to reference Appendix 5 (see attached updated pages in Appendix H).

In addition the following changes to the 2010 LRDP would be made:
Revised text on LRDP on Page D-6 in the Reserve Overlay land use designation allowed uses are shown in underline and italics below:

Allowed uses within the Reserve Overlay shall be limited to:

- Environmental interpretation/educational displays
- Fences, signs, or other wildlife permeable, natural barriers to protect public safety, manage open space areas, and direct public access
- Habitat creation, restoration and/or enhancement activities, including vegetation management for habitat restoration purposes consistent with Policy ESH-12
- Parking for Reserve personnel and volunteers
- Public coastal access, including public coastal access trails, parking, benches and bicycle racks
- Reserve Director’s residence including an animal confinement facility for keeping animals in accordance with Policy LU-34 (c).
- Reserve Field Station facilities such as workshops, storage sheds, offices, greenhouses and shade hut
- Weather stations, observation blinds, or other similar small structures to enhance the Reserve’s objectives as a natural study area

A New LRDP Policy would be added to support the changes to the Reserve Overlay land use designation:

**LU-34 (c)**

A Confined Animal Facility (CAF) for Animal Keeping at the Reserve Director’s residence shall require a Notice of Impending Development. The CAF shall house no more than 10 adult animals, up to 20 youth or newborn animals and not to exceed 30 total animals at any time. A manure waste management plan shall be required. Animal grazing is prohibited on the Reserve or in adjacent Open Space areas without a grazing plan approved by the Coastal Commission.

“Development” in the COPRMP includes some tree removal and planting (as restoration), restoration activities, septic tank maintenance, a minimal amount of fencing, continuance of the SPMP, and access maintenance. In addition, the Reserve Director desires to keep goats as pets at the Director’s Residence. This requires allowing up to 30 goats in a confined animal facility. The required amendment to the text of the 2010 LRDP is as above.

Tree Removal and planting would be consistent with the 2010 LRDP and in accordance with all tree removal and trimming policies and protocols in the 2010 LRDP such as ESH ESH-28 and ESH-29 and all applicable protocols in Appendix 2, Campus Tree Trimming and Removal Program. For example, raptor and bird nesting surveys would be conducted prior to removal and the removed trees would be replaced in accordance with required ratios.

Restoration activities at the Reserve were permitted through NOID 4-07 and will continue in accordance with all aspects of the permit and the 2010 LRDP guiding restoration activities in or near ESHA. Any future restoration activities not included in NOID 4-07 will adhere to all applicable LRDP Policies and a NOID would be submitted to the CCC if required.

Upgrading the septic system will be conducted with all regulatory permitting requirements in accordance with policy:
“Policy WQ-17 - All sewage from campus development shall be disposed of in sanitary sewer lines or approved septic tank system subject to design and performance requirements of the Regional Water Quality Control Board.”

Policy WQ-15 - At Coal Oil Point, if percolation is determined through tests to be inadequate to prevent bluff top erosion, alternative methods to direct stormwater to eliminate the erosion hazard, shall be evaluated based on the water quality protection priorities outlined in the LRDP policies and Appendix 3, Water Quality Protection Program. The revisions to drainage shall require a Commission-approved water quality protection plan.

Fencing was included in the Access Plan NOID 1-10 however did not include the fencing around the Reserve Field Station (replacing old chain link with a wood fence). Existing chain link fencing will be replaced with wood fencing. Fencing is consistent with the 2010 LRDP in the Reserve Overlay land use designation.

TEXT AND FIGURE CHANGES

The correction of the typo and private property boundary on the maps is consistent with all aspects of the LRDP and would not result in conflicts.

PUBLIC PARTICIPATION

In satisfaction of California Code of Regulations (CCR) Title 14, Division 5.5, Section 13552 (a) the following is a summary of the measures taken to provide the public and affected agencies and districts maximum opportunity to participate in the LRDP Amendment process.

Public Notice of the amendment and the review period dates are published in the Santa Barbara News Press. The 6-week review period is in progress. The Draft LRDP Amendment is available for public review at the UCSB Library, the Office of Campus Planning and Design, and the Santa Barbara and Goleta Valley public libraries. Copies of the public notices and a list of agencies contacted are included as an Appendix I. The proposed LRDP Amendment was approved by the University of California President in August 2015. Approval documentation is included as Appendix J.

Submission of all Policies, Plans, Standards, Objectives, Diagrams, Drawings, Maps, Photographs, and Supplementary Data Sufficient to Allow Review for Conformity with the Coastal Act

In accordance with CCR Title 14, Division 5.5, Section 13552, this document includes all policies, plans, standards and other information sufficient to allow review for conformity with the Coastal Act. It includes a description of the proposed amendment along with an explanation of the project objectives. This document also contains a discussion of the amendment's conformity with the Coastal Act and contains figures that depict the project site plan, LRDP
figure changes, and other information incidental to the proposed LRDP amendment. The 2010 LRDP has been previously sent to interested parties, local governments, state agencies, and local organizations and is also available at local libraries.

The 2010 LRDP includes a readily identifiable public access component in LRDP Section E, Public Access. The COPRMP does not impact public access to the coast and contains a CCC approved Access Plan. Increased vehicular traffic would not be generated as part of the proposed project since the faculty, staff, students, volunteers, and public currently working at and coming to the Reserve would not increase.

The LRDP Amendment’s Relationship to and Effect on the Other Sections of the LRDP

In accordance with CCR Title 14, Division 5.5, Section 13552, the relationship of the proposed LRDP amendment for the proposed action (adding the COPRMP to the LRDP) to the certified LRDP is discussed above.

Analysis that Meets the Requirements of CCR Section 13511 and that Demonstrates Conformity with the Requirements of Chapter 3 of the Coastal Act

CCR Title 14, Division 5.5, Section 13511, Common Methodology, requires information be supplied on the kind, location, and intensity of the proposed development in relation to the effects of the project on coastal resources protected by the California Coastal Act (Chapter 3). The information must also include potential cumulative impacts on coastal resources. In accordance with CCR Title 14, Division 5.5, Section 13552, the proposed project’s relevance to particular Coastal Act policies is reviewed in this amendment and the Campus strategy for ensuring conformity with Coastal Act policies is described. LRDP and the LRDP Final Environmental Impact Report (EIR) and adopted by the Chancellor were reviewed to ensure conformity with the Coastal Act.

The application of the Chapter 3 policies of the Coastal Act to the proposed project and LRDP amendment is set forth below. The structure of the analysis would be the same information described in the Notice of Impending Development and is designed to reflect the structure of Chapter 3 of the Coastal Act and LRDP implementation of Chapter 3 of the Coastal Act. The discussion consists of four sections, each of which corresponds to one of the applicable articles of Chapter 3 of the Coastal Act.

1. NEW DEVELOPMENT

With regard to the location of new development the Coastal Act provides that:
§30250 (a) New residential, commercial or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, whether individually or cumulatively, on coastal resources.
Development proposed in the COPRMP is not residential, commercial, or industrial and would support residential (upgrading septic tank, constructing fencing, and installing a confined animal facility) and restoration and research activities. Proposed development at the Reserve is minimal and would be within close proximity to existing developed areas able to accommodate it.

The LRDP amendment will revise the Reserve Overlay land use designation to allow animal confinement facilities at the Reserve Director’s residence, and no land use incompatibilities or conflicts would result because the animal pen would have a very small footprint (2,145 square feet), would be a bucolic use in an area of open space with no close neighbors, and would be entirely contained within the existing confines of the Reserve Director’s residence, which is currently fenced.

There is no development proposed with the text and figure changes.

**With regard to scenic and visual qualities, the Coastal Act provides that:**

§30251 The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas.

There is no new development proposed in the Reserve that would result in scenic or visual impacts. The Reserve Field Station is fenced and shielded with vegetation and trees. Installation of a confined animal facility within the Director’s Residence yard would not be seen from public places. Restoration activities including tree removal could result in a short term scenic and visual impact however would be mitigated by replacing the trees with native trees more compatible with the Reserve environment. Restoration activities including tree removal would be in accordance with LRDP Policies guiding tree removal.

There is no development proposed with the text and figure changes.

**In terms of maintaining and enhancing public access to the coast, the Coastal Act states:**

§30252 The location and amount of new development should maintain and enhance public access to the coast by: (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Public access to the coast would not be impacted by implementing the COPRMP. There is no public parking at Coal Oil Point or the Reserve Field Station and a locked (with key pad coded access) entrance gate to the Reserve Field Station prevents public vehicles from driving to the point to “check the surf” or park illegally. A sign with contact phone numbers on the access
gates directs ADA vehicles to ADA parking spaces at Coal Oil Point. There are two spaces at Coal Oil Point (not on the Reserve) for ADA use only.

There is no development proposed with the text and figure changes.

**With regard to safety, stability, pollution energy conservation and visitors, the Coastal Act stated that:**

§30253 New development shall:
1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural land forms along bluffs and cliffs.
3) Be consistent with requirement imposed by an air pollution control district or the State Air Resources Control Board as to each particular development.
4) Minimize energy consumption and vehicle miles traveled.
5) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

There is no new development proposed on the ocean bluffs at Coal Oil Point or the Reserve. Fencing exists along the top of the bluff at West Campus Open Space and Coal Oil Point.

There is no development proposed with the text and figure changes.

2. **PUBLIC ACCESS**

The Coastal Act provides that:

§30210 Maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety need, and the need to protect public rights, rights of private property owners, and natural resource areas from overuse

Public access to the coast would not be impacted by implementing the COPRMP. There is no public parking at Coal Oil Point or the Reserve Field Station and a locked (with key pad coded access) entrance gate to the Reserve Field Station prevents public vehicles from driving to the point to “check the surf” or park illegally. A sign with contact phone numbers on the access gates directs ADA vehicles to ADA parking spaces at Coal Oil Point. There are two spaces at Coal Oil Point (not on the Reserve) for ADA use only.

There is no development proposed with the text and figure changes.

In regard to public facilities and coastal access distribution, the Coastal Act states that:

§30212.5 Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.

The COPR is part of the UC Natural Reserve System (UCNRS). The mission of the UCNRS is for research and education and the Reserves do not provide public access. The COPR provides public access since it is located on the coast and adjacent to UC developed areas.
There is no public parking at the Reserve however there is public parking in proximity at the Devereux campus. There is easy pedestrian and bicycle access from Devereux to adjacent open spaces (West Campus Bluffs) and campus beaches.

There is no development proposed with the text and figure changes.

3. **RECREATION**

Implementation of the COPRMP does not impact recreational activities. The public can access campus beaches (Sands Beach) and open spaces adjacent to the Reserve and there are no organized recreational uses at the Reserve, adjacent to the Reserve, or at Sands Beach.

4. **MARINE ENVIRONMENT**

The Coastal Act states:

§30230 Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

The mission of the COPRMP is to preserve and restore the coastal marine environment. Adding the COPRMP to the LRDP would serve to further enhance marine resources with continued implementation of the Western Snowy Plover and Restoration Plans.

There is no development proposed with the text and figure changes.

With regard to biological productivity and water quality, the Coastal Act states:

§30231 The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The mission of the COPRMP is to preserve and restore the coastal marine environment and increase biological productivity at the Reserve. Wetland areas at the Reserve are restored and maintained and the Devereux Slough water quality has historically been monitored. The Slough margins have been restored (i.e non-native plants removed and replaced with native vegetation).

5. **LAND RESOURCES**
The Coastal Act provides:
§30240 Environmental sensitive habitat areas; adjacent developments (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

There is no new development proposed in the COPRMP that would impact Environmentally Sensitive Habitat Areas (ESHA). The mission of the Reserve is to protect and restore ESHA. Any proposed non-native tree removal would follow LRDP policies and protocol for tree removal.

The COPR Field Station is more than 100 feet from ESHA and any improvements within the fenced area of the Field Station would not impact ESHA. All native vegetation within the Reserve Field Station was planted by the Reserve staff. The Field Station was formerly developed as a summer camp and much non-native Acacia was planted at the time (during the 1960s). A majority of the Acacia has been removed over the entire Reserve. Installing a confined animal facility and keeping 10 adult goats at the facility (up to 30 at one time including newborns) would not result in vegetation clearing or grading. The animal pen fencing would be portable metal panels installed on T-posts and easily moved around. The goats would be confined to the animal pen (approximately 2,000 square feet) unless they were being walked on the road. The goats would never be allowed to graze or roam freely in open spaces or ESHA.

There is no development proposed with the text and figure changes.

Environmental Review documents, pursuant to CEQA required for all or any portion of the amendment to the LRDP

Pursuant to State law, an Addendum to the 2010 LRDP Environmental Impact Report (SCH#2007051128) was prepared for the LRDP Amendment to add the COPRMP to the LRDP, make revisions to the Reserve Overlay land use designation, develop new policy to allow for a confined animal facility and animal keeping at the Reserve Director's Residence, and to correct a typo in LRDP Table A.1 and make property boundary edits to add a private property boundary inadvertently unmapped. The LRDP Amendment and Addendum to the LRDP EIR were approved by the UC President on August 28, 2015. The approval documentation is attached in Appendix J. The Addendum is attached in Appendix K.