CEQA Findings, and Findings of Fact for the CSUCI Specific Reuse Plan Amendment and Phase 2 Development of the East Campus Residential Neighborhood Project

Introduction

Purpose

This statement of findings addresses the environmental effects associated with the California State University, Channel Islands (CSUCI) Specific Reuse Plan Amendment and Phase 2 Development of the East Campus Residential Neighborhood Project ("project"), located in the CSUCI campus' East Campus Residential Neighborhood. This statement is made pursuant to the California Environmental Quality Act ([CEQA] Public Resources Code [PRC], §21000 et seq.), specifically PRC Sections 21081 and 21081.6, and the State CEQA Guidelines (California Code of Regulations, Title 14, §15000 et seq.), specifically Section 15091. The potentially significant effects of the project were identified in both the Draft and Final Environmental Impact Report (EIR).

PRC Section 21081 and State CEQA Guidelines Section 15091 require that the lead agency, in this case the California State University (CSU) Board of Trustees, prepare written findings for identified significant impacts, accompanied by a brief explanation of the rationale for each finding. Specifically, State CEQA Guidelines Section 15091 states, in part, that:

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects accompanied by a brief explanation of the rationale for each finding. The possible findings are:

(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The Final EIR for the project identified potentially significant effects that could result from project implementation. The Board of Trustees finds that the inclusion of certain mitigation measures as part of the project approval will reduce all of those effects to a less than significant level.

As required by CEQA, the Board of Trustees, in adopting these findings, also adopts a Mitigation Monitoring and Reporting Program (MMRP) for the project. The Board of Trustees finds that the

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MMRP, which is incorporated by reference and made a part of these findings, meets the requirements of Public Resources Code Section 21081.6 by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the project.

In accordance with CEQA and the State CEQA Guidelines, the Board of Trustees adopts these findings as part of its certification of the Final EIR for the project. Pursuant to PRC Section 21082.1, subdivision (c)(3), the Board of Trustees also finds that the Final EIR reflects the Board of Trustee's independent judgment as the lead agency for the project.

Organization/Format of Findings

Section 1 contains a summary description of the project and background facts related to the environmental review process. **Section 2** identifies the potentially significant effects of the project that will be mitigated to a less than significant level with implementation of the identified mitigation measures. **Section 3** identifies the project's potential environmental effects that were determined not to be significant, and **Section 4** discusses the feasibility of the project alternatives.

Section 1 Summary of Project Description

The proposed project is a development of 600 residential units on an approximate 32-acre site within the East Campus Residential Neighborhood, also known as University Glen, at CSUCI. It is anticipated that the units would range between approximately 800 square feet (SF) to 2,400 SF. The proposed density would be 19 dwellings per gross acre.

The proposed project offers a mix of multi-family apartments for rent, for-sale single-family attached/detached homes, and income/age-restricted apartments. A portion of the residential development would be three-story development with some two-story massing. The maximum height of the proposed residences would not exceed 40 feet per the requirements of the CSUCI Community Development Area Specific Reuse Plan (hereafter referred to as Specific Reuse Plan). The project site plan also includes approximately 3.7 acres of recreation/ park area that includes a central park and clubhouse, two vista parks along the northern periphery of the project site, and various paseos and courtyards. The design of the buildings would feature stucco wall surfaces, tile roofs, and Mission-revival and Spanish-colonial revival architectural styles that would blend with and complement the existing Phase 1 University Glen development.

Development of the proposed project would require an amendment to the Specific Reuse Plan. Under the existing Specific Reuse Plan, the project site is entitled for 242 single-family residential units. The Specific Reuse Plan currently designates the project site for low to low-medium residential density (0-10 units per acre) development. The amendment would allow for low-medium to medium-high residential density (10-20 units per acre) at the project site and for development of the number of residential units proposed.

To accommodate the increase in density, the number of lots, parcel and roadway configuration, and utility lines currently present at the project site would be modified. Existing building pads and roads would be demolished and replaced. Much of the existing utilities and infrastructure would also need to be replaced and/ or modified to serve the new site layout; however, no alterations to existing pipelines that cross the unnamed drainage that traverses the project site would take place.

The northern portion of the project site (called Inspiration Point) is currently accessed by a partially paved road that crosses an unnamed drainage feature and culvert. The drainage crossing does not provide adequate access to Inspiration Point and the culvert is currently undersized to withstand a

100-year storm event. Consequently, as part of the proposed project, the existing crossing and drainage culvert leading to Inspiration Point would be demolished and replaced with a new culvert and crossing sized to accommodate a 100-year storm event.

Onsite water quality treatment would be managed with multiple bio-filtration/bio-planter systems throughout the project site. In addition, improvements to the outlet from the downstream drainage basin/constructed wetlands would be made as part of the proposed project to maintain stormwater discharge at its current rate.

The proposed project would also include a 100-foot-wide zone to be maintained for fuel modification in the form of limited, select landscape types. Fuel modification would require removal of certain species of plants and limit the spacing of fuel intense shrubs and trees to meet Ventura County Fire Department requirements. The 100-foot buffer is measured from the most projected element of the eaves of structures measured out perpendicular from the structure for a minimum of 100 feet.

Provided below is a list of the anticipated discretionary actions requiring approval by California State University, Board of Trustees:

- Revision to the Campus Master Plan
- Schematic plan approval
- Final approval of real property public-private partnership
- Others, as may be necessary

In addition to the discretionary approvals by the California State University, Board of Trustees, additional approvals will need to be obtained from California State University, Channel Islands Site Authority, acting in its role as a responsible agency for the proposed project. These additional approvals include, but may not be limited to, the following:

- Specific Reuse Plan Amendment adoption
- Approval of the proposed project
- Schematic plan approval
- Others, as may be necessary

Project Objectives

The following are the proposed project's objectives:

- Provide multiple types of high-quality, local housing to attract faculty and staff to the CSUCI campus from outside the area.
- Provide additional housing resources that blend with and augment the existing University Glen community to form one cohesive neighborhood.
- Provide a live/work environment associated with the CSUCI campus.
- Provide age- and income-restricted housing to respond to the community request for a mixed demographic of apartments, single-family detached houses, and townhomes.
- Provide additional active and passive recreational amenities for use by the entire University Glen community.
- Utilize the Private-Public Partner development process to provide a method for implementation of the project.

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The Board of Trustees has considered the statement of the objectives sought by the project as found in **Section 2**, *Project Description*, of the Final EIR. The Board of Trustees adopts these objectives as part of the project.

Initial Study and Notice of Preparation

To determine the environmental topics to be addressed in the EIR, the University prepared a Notice of Preparation (NOP) and Initial Study (IS), and circulated the NOP and IS on December 14, 2016 to interested public agencies, organizations, community groups and individuals in order to receive input on the project. The University also held two public information meetings on December 15, 2016 and January 4, 2016, to obtain public input on both the project and the scope and content of the EIR. Interested parties attended the public information meeting and provided input.

Based on the NOP and IS scoping process, the EIR addressed the following topics:

- (a) Aesthetics
- (b) Air Quality
- (c) Biological Resources
- (d) Greenhouse Gas Emissions
- (e) Hydrology and Water Quality
- (f) Land Use and Planning
- (g) Noise
- (h) Public Services
- (i) Recreation
- (j) Transportation and Circulation
- (k) Tribal Cultural Resources, and
- (I) Utilities and Service Systems

Based on the NOP and IS scoping process, potential impacts relating to agriculture and forestry resources, hazards and hazardous materials, mineral resources, and population and housing were determined to be not significant and, therefore, were not discussed in detail in the EIR. In addition, impacts to geology and soils were found to be less than significant with mitigation incorporated in the IS as such this issue was not discussed in detail in the EIR. Mitigation measures required to reduce geology and soils impacts are included in the Executive Summary of the EIR and in the Mitigation Monitoring and Reporting Program.

Environmental Impact Report

The University prepared the EIR in accordance with CEQA and the State CEQA Guidelines. The EIR is a full-disclosure informational document that informs public agency decision-makers and the public of the potentially significant environmental effects of the project. Measures to minimize significant effects are identified in the EIR and reasonable alternatives to the project are evaluated.

The EIR is intended as a "Project EIR" under CEQA and the State CEQA Guidelines. A Project EIR is typically prepared for a specific development project (see State CEQA Guidelines §15161). Under CEQA, a project EIR "should focus primarily on the changes in the environment that would result

from the development project" and "...examine all phases of the project including planning, construction, and operation".

The Draft EIR was made available to the public for review and comment for a 45-day period. The review and comment period began on February 22, 2017 and concluded on April 7, 2017.

Copies of the Draft EIR were available for public review at the following locations:

- John Spoor Broome Library, CSUCI Campus, 1 University Drive, Camarillo, California
- Ironwood Hall, CSUCI Campus, 1 University Drive, Camarillo, California

The Draft EIR also was available for review at <u>http://www.csuci.edu/ci-2025/vision-plan.htm</u>.

All comment letters received in response to the Draft EIR were reviewed and are included in the Final EIR, along with written responses to each of the comments. In accordance with State CEQA Guidelines Section 15132, the Final EIR for the project consists of:

- (i) The Draft EIR and subsequent revisions
- (ii) Comments and recommendations received on the Draft EIR
- (iii) A list of the persons, organizations, and public agencies commenting on the Draft EIR
- (iv) Written responses to significant environmental issues raised during the public review and comment period and related supporting materials, and
- (v) Other information contained in the EIR, including EIR appendices

Section 2Findings on Significant but Mitigated Impacts

This section identifies the significant adverse impacts of the project that require findings to be made under PRC Section 21081 and State CEQA Guidelines Section 15091. Based on a substantial record of evidence, the Board of Trustees finds that adoption of the mitigation measures set forth below will reduce the identified potentially significant impacts to less-than-significant levels.

Air Quality

Potentially Significant Impacts

The proposed project's maximum daily operational Nitrogen Oxides (NO_x) emission is within a pound of the threshold level and could be mitigated to below threshold level through the incorporation of mitigation measures. Estimated reductions were determined by comparing the baseline CalEEMod run described in the Methodology section (in the Draft EIR) to a baseline run with mitigation measures included. Mitigated emissions were calculated using winter emissions, as winter has the highest level of NO_x operational emissions.

In addition, the proposed project would generate air quality pollutants from construction activities associated with all phases of construction, such as worker trips, hauling trips, construction vehicle emissions, and paint application. Construction of the proposed project would emit a maximum of 48 pounds of reactive organic compounds (ROC) per day and 59.6 pounds of NO_x per day. The proposed project would also result in maximum daily emissions of PM₁₀ (particulate matter less than 10 microns in diameter) and PM_{2.5} (particulate matter less than 2.5 microns in diameter) of 42.1 and 12.3 pounds per day, respectively. The Ventura County Air Pollution Control District (VCAPCD) recommends all projects that include construction activities to adopt provided "Fugitive Dust Mitigation Measures" and "ROC and NO_x Construction Mitigation Measures" to mitigate a project's contribution to existing exceedances of state and federal ozone standards and State PM₁₀

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standards, and also requires inclusion of "Fugitive Dust Mitigation Measures" when construction ROC and NO_x emissions exceed 25 pounds per day. ROC and NO_x emissions generated by construction activities would exceed 25 pounds per day. Therefore, to ensure construction activities would not contribute to existing air quality exceedances in the Ventura County Air Basin and to reduce air quality impacts to a less than significant level, mitigation measures are incorporated.

Lastly, the project site includes previously undisturbed areas that would be disturbed by the proposed project, potentially releasing fungal spores responsible for Valley Fever, which generally grow in virgin, undisturbed soil. The ground disturbing activities could pose a risk to workers at the site, if present. The VCAPCD recommends implementation of measures to reduce the risk of infection during construction activities in areas with a potential for presence of Valley Fever. Implementation of these measures during construction on areas of the site with a potential for presence of Valley Fever causing spores would reduce the potential risk of Valley Fever infection during ground-disturbing construction activities to a less than significant level and are required.

Mitigation Measures

AQ-1 Operational NO_x Emissions

The proposed project shall incorporate the following measures to reduce NO_x emissions to a less than significant level:

- All landscape maintenance equipment shall be electric. This would achieve a reduction of 0.12 pounds of NO_x per day.
- No fireplaces (wood or gas) shall be included in the proposed project. This would achieve a reduction of 0.9 pounds of NO_x per day.

If the above mitigation options are not preferable, the project applicant shall propose alternative mitigation options and submit proof to the lead agency that emissions would be reduced to below daily threshold levels through these measures prior to commencement of ground disturbing activities. The lead agency shall verify compliance during construction activities.

AQ-2 (A) Construction Fugitive Dust Emissions

The following mitigation measures shall be incorporated to reduce construction emissions of fugitive dust (based on the Ventura County Air Quality Assessment Guidelines, Section 7.4.1).

- The area disturbed by clearing, grading, earth moving, or excavation operations shall be implemented in a manner to prevent excessive amounts of dust.
- Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably recycled, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.
- All trucks shall be required to cover their loads as required by California Vehicle Code §23114.
- All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be watered periodically to reduce fugitive dust. Watering shall be done as often as necessary and reclaimed water shall be used whenever practicable.
- Graded and/or excavated inactive areas of the construction site shall be monitored at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction,

and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.

- Signs shall be posted on-site limiting traffic to 15 miles per hour or less.
- During periods of high winds, all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to minimize fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in determining when winds are excessive.
- Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.
- Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.

AQ-2 (B) Construction ROC and NO_x Emissions

The following mitigation measures shall be incorporated to reduce ROC and NO_x emissions during construction (based on the Ventura County Air Quality Assessment Guidelines, Section 7.4.3).

- Minimize equipment idling time.
- Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications.
- Minimize the number of vehicles and equipment operating at the same time during the smog season (May through October), to the extent practicable.
- Use alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electric, to the extent practicable.

AQ-6 Valley Fever

The following mitigation measures shall be implemented, as practicable, during ground disturbing activities in previously undisturbed areas of the project site determined to have potential for presence of Valley Fever causing spores, as recommended in the Ventura County Air Quality Assessment Guidelines, Section 7.4.2.

 Require crews to use respirators during project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations.

Prior to the start of ground disturbing activities, the applicant shall submit a grading plan to the University, which indicates the areas of the site that are previously undisturbed where Valley Fever mitigation measures will be implemented.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, are adopted, and will reduce the potential air quality-related impacts of the project to less than significant levels. Accordingly, the Board of Trustees finds that, pursuant to PRC Section 21081, subdivision (a)(1), and State CEQA Guidelines section 15091, subdivision (a)(1), changes or alterations have been required

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in, or incorporated into, the project that mitigate or avoid potentially significant air quality-related impacts of the project identified in the Final EIR.

Biological Resources

Potential Significant Impacts

Existing vegetation within and adjacent to the project site could provide habitat for nesting birds that are protected under the Migratory Bird Treaty Act (MBTA) (16 United States Code Section 703-711) and California Fish and Game Code (Section 3500). Protected birds include common songbirds, waterfowl, shorebirds, hawks, owls, eagles, ravens, crows, native doves and pigeons, swifts, martins, swallows, and others, including their body parts (e.g., feathers, plumes), nests, and eggs. The proposed project has the potential to impact migratory and other bird species if construction activities occur during the nesting/breeding/dispersal season, typically February 1 through September 15. Construction-related disturbances could result in nest abandonment or premature fledging of young. Therefore, the proposed project could result in potentially significant impacts to nesting birds. Mitigation is required to reduce these potential impacts to less than significant.

The proposed project is not expected to impact special status plant species, primarily due to the fact that the majority of the site was previously graded and disturbed. The small natural area associated with the unnamed drainage does not contain suitable habitat for special status plant species to occur. Adjacent habitat within the fuel modification areas (i.e., within 100 feet of the development area portion of the project site) does not contain sensitive vegetation communities, but may provide suitable habitat for special status plants. Therefore, although impacts to vegetation communities are not expected from implementation of the proposed project, mitigation measures are required to address potential impacts to special status plant species.

The majority of the project site has previously been disturbed and graded, except for the unnamed blue line stream feature. However, as determined by the Jurisdictional Delineation Report (Appendix E of the EIR), no special status vegetation communities are present within or adjacent to the unnamed blue line stream feature. In addition, as described in the Initial Study, no suitable habitat for special status species was observed onsite (see Appendix A of the EIR). As described in Section 2.0, *Project Description* (of the EIR), the rectangular outlet that drains the constructed wetland located south of the project site along Channel Islands Drive and Camarillo Street would be modified to reduce flows during a 100-year storm event. Although the culvert is not located within any sensitive habitat (i.e., dominant vegetation is coyote bush scrub), the culvert is located within an United States Army Corps of Engineers (USACE)/Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW) jurisdictional drainage and mitigation measures are required to reduce impacts to a less than significant level.

Mitigation Measures

BIO-1 (A) Nesting Birds

The following mitigation measure, in compliance with MBTA and California Fish and Game Code requirements, is required to reduce potentially significant impacts to nesting birds.

To avoid disturbance of nesting and special-status birds, including raptorial species protected by the MBTA and California Fish and Game Code, activities related to construction of the proposed project, including, but not limited to vegetation removal, ground disturbance, and construction and

demolition, should occur outside of the nesting season (February 1 through September 15). If construction activities must occur during the nesting season, a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of ground disturbance and vegetation removal activities. The survey shall be conducted on foot and visually assess the entire project site, including a 300-foot line-of-site buffer (500-foot for raptors and listed species, e.g. California gnatcatcher) using binoculars to the extent practical. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California coastal communities. If active nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist using bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and instructed to avoid entering the buffer zone during the nesting season. No construction activities shall occur within this buffer until the biologist has confirmed that breeding / nesting is completed and the young have fledged. Encroachment into the buffer shall occur only at the discretion of the qualified biologist. In the event a coastal California gnatcatcher, or other listed species, is observed nesting within the 500-foot survey buffer during the survey, no construction activities shall occur until the project proponent has consulted with USFWS and/or CDFW, as appropriate, for additional guidance regarding take avoidance.

BIO-1 (B) Special Status Plant Surveys

To avoid impacts to special status plants within the fuel modification area, surveys for special status plants shall be completed prior to any vegetation removal, grubbing, or other construction activity within this area. The surveys shall be floristic in nature, seasonally-timed to coincide with the blooming period of the target species identified in this EIR as having a potential to occur, and be conducted by a qualified biologist. All special status plant species identified on-site shall be mapped onto a site-specific aerial photograph and topographic map. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions, if any such protocols exist. A report of the survey results shall be submitted to the implementing agency for review and approval.

BIO-1 (C) Special Status Plant Avoidance Measures

Any State listed or California Rare Plant List 1B species found during special status plant surveys [pursuant to mitigation measure BIO-1(b)] shall be avoided, and any vegetation clearing within 50 feet of any identified rare plant will be conducted by hand, if practicable. Any rare plant occurrences shall have bright orange protective fencing installed at least 50 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm.

BIO-1 (D) Restoration Plan

If special status plants species cannot be avoided and will be impacted by the project, all impacts shall be mitigated at a minimum ratio of 2:1 (number of acres/individuals restored to number of acres/individuals impacted) for each species as a component of habitat restoration, including but not limited to transplantation and habitat restoration. A restoration plan shall be prepared and submitted to CDFW and/or USFWS, as appropriate, for approval (e.g., if a state listed plant species will be impacted, the restoration plan shall be submitted to the CDFW for approval).

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BIO-2 (A) Avoidance and Minimization

Potential jurisdictional areas (ephemeral drainages) shall be avoided to the extent practical. Any material/spoils generated from project activities shall be located away from jurisdictional areas and protected from stormwater run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank. Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned and any contaminated materials properly disposed. For all spills, the project foreman will be notified.

BIO-2 (B) Compensatory Mitigation

Prior to ground disturbance activities that will impact waters and wetlands of the U.S. and/or State, the project proponent shall consult with USACE on the need for a Clean Water Act Section 404 permit, the RWQCB regarding compliance with Section 401 of the Clean Water Act, and CDFW on the need for a Streambed Alteration Agreement. Based on consultation with the agencies, if permits are required for the project, appropriate permits shall be obtained prior to disturbance of jurisdictional resources. To provide compensatory mitigation for impacts associated with replacement of the culvert, permanent impacts will be mitigated at a minimum 1:1 ratio, and subtracted from the excess acreage of the campus mitigation program. Temporary impact areas adjacent to the new Inspiration Bridge culvert, and temporary impacts associated with modification of the constructed wetlands outlet will be re-vegetated consistent with the requirements of the existing Habitat Mitigation and Monitoring Plan (HMMP; Rincon Consultants, Inc. 2002) and HMMP Update (Rincon Consultants, Inc. 2009). Further information regarding the HMMP is provided in the Regulatory Due Diligence and Mitigation Planning Memorandum (Rincon Consultants, Inc. 2012).

Findings

The Board of Trustees finds that the above mitigation measures are feasible, are adopted, and will reduce the potential biological resource-related impacts of the project to less than significant levels. Accordingly, the Board of Trustees finds that, pursuant to PRC Section 21081, subdivision (a)(1), and State CEQA Guidelines section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or avoid potentially significant biological resource-related impacts of the project identified in the Final EIR.

Geology and Soils

Potential Significant Impacts

The Initial Study describes the potential impacts of the proposed project and the previous geologic studies prepared for the project site. Potential significant geologic impacts include landslides, lateral spreading, subsidence, liquefaction, or collapse as well as the project site being located on expansive soils, creating risk to life or property. Proposed mitigation measures for these potential significant impacts are also included in the Initial Study.

Landslides

During an earthquake event, the seismic shaking forces applied to native hillside areas can result in "seismically induced landslides." These typically occur in areas of steeper hillsides, near the tops of

ridges, where weathered surficial and bedrock materials are exposed on slopes, and in areas of prior landslides. The topography of the project site is relatively flat. The project site, however, is located near areas where earthquake-induced landslides are mapped and/or where landslide movement has occurred in the past according to the State of California Seismic Hazard Camarillo Quadrangle. There is a possibility for landslides, particularly if residual soils layered between flows of volcanic bedrock in the surrounding slopes are exposed by a slope excavation, as well as rockfalls and surface debris flows along natural slopes.

Fugro West, Inc. conducted a geotechnical study in December 2000 for CSUCI that presents findings, conclusions, and recommendations concerning the geotechnical conditions in the East Campus Development area, including the project site. Fugro West also prepared an addendum in 2007 that provides revised recommendations in anticipation of demolition of the existing Inspiration Point creek crossing and drainage culvert and construction of a new culvert and crossing, which would be included as part of the proposed project. Both documents are included in Appendix A of the Initial Study for the proposed project.

The majority of the project site avoids hillside areas and slopes greater than 10 percent. Building pads along Inspiration Point and the road itself have been previously graded. Slopes adjacent to Inspiration Point crossing may exceed 10 percent. In addition, slopes occur to the north, and a landslide on adjacent lands could potentially expose people or structures to substantial adverse effects.

Subsidence, Liquefaction, and Lateral Spreading

Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal movement. Subsidence is caused by a variety of activities that include, but are not limited to, withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydrocompaction. Lateral spreading is the horizontal movement or spread of soil toward an open face. The potential for failure from subsidence and lateral spreading is highest in areas where the groundwater table is high and where relatively soft and recent alluvial deposits exist. Lateral spreading hazards may also be present in areas with liquefaction risks.

The Ventura County General Plan Subsidence Zones Map (2011) does not identify the project site as being located in an area where subsidence is probable. In addition, the project site is located on a geologic unit with low risk for lateral spreading, subsidence, liquefaction, collapse, or landslides, although it is near slopes that may experience landslides. Any new construction would be required to follow California Building Code (CBC) standards that address liquefaction hazards, including strengthening the foundation and footings.

Expansive Soils

Expansive soils generally contain high percentages of clay. The Geotechnical Study identified the presence of near-surface clay with medium and high to very high expansiveness at the project site. The study provided recommendations for mitigating the expansiveness of soils at the project site. All development would be required to comply with the Uniform Building Code (UBC) and the CBC and incorporate Mitigation Measures GEO-1, GEO-2, and GEO-3, which are included in the Initial Study for the project (Appendix A of the EIR). Compliance with building standards and incorporation of required mitigation measures would reduce impacts related to expansive soils to a less than significant level.

Mitigation Measures

GEO-1 Incorporate recommendations of Geotechnical Study: Cal State University Channel Islands East Campus Development (Site Authority 2000)

Recommendations presented in the Geotechnical Study shall be incorporated at the project site. These recommendations include site preparation, excavation considerations, slope construction, subgrade stabilization measures, fill selection and compaction, shrinking and subsidence, shallow foundation design, retaining walls, bridge drilled pier foundation, utility trenching, pipe bedding, trench backfill, and pavements. A more detailed explanation of each recommendation is provided in the Geotechnical Report (Appendix A of the Initial Study for the proposed project).

GEO-2 Update Geotechnical Study, as needed

The applicability of the existing Geotechnical Study and Addendum for current site conditions and construction/grading plan will be assessed by a geotechnical consultant. If recommendations in the existing Geotechnical Study and Addendum are no longer applicable to existing conditions, updates and/or a new geotechnical study will be required. Recommendations resulting from the new study shall be incorporated into the proposed project to mitigate geological hazards to a less than significant level.

GEO-3 Incorporate recommendations of 2007 Geotechnical Study Addendum

The proposed project shall incorporate the recommendations presented in the Geotechnical Study Addendum (Appendix A of the Initial Study for the proposed project), including, but not limited to observations during demolition, excavation and the use of appropriate backfill material, to mitigate geological hazards to a less than significant level.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, are adopted, and will reduce the potential geologic-related impacts of the project to less than significant levels. Accordingly, the Board of Trustees finds that, pursuant to PRC Section 21081, subdivision (a)(1), and State CEQA Guidelines section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or avoid potentially significant geologic-related impacts of the project identified in the Final EIR.

Hydrology and Water Quality

Potential Significant Impacts

The proposed project would increase the impervious surface area of the project site, as the existing conditions include graded and paved roads, without structures, while the proposed project would include the residential and recreational structures. Similar to existing conditions, results of the impact analysis also indicate that the existing constructed wetlands currently suffice to retain the entire volume produced by the 25-year storm event. However, the proposed project would result in a peak discharge of 22.5 cubic-feet per second (cfs) from the existing basin during the 100-year storm event, which is higher than 12.5 cfs under existing conditions. The increase is due to the higher volume of runoff produced by the proposed project (87.3 acre-feet) when compared to the

existing condition (78.0 acre-feet). Modification of the outlet from the constructed wetland to maintain peak discharges during a 100-year storm event at current volumes are included as part of the proposed project as described in Section 2.0, *Project Description*, of the EIR. However, depending on the timing of this improvement there is the potential for changes to the existing drainage pattern of the site, which could result in increased flooding and the potential for substantial erosion or siltation to occur on- or off-site. Therefore, a potentially significant impact could occur and mitigation is required.

Mitigation Measures

HWQ-1 Modification of the Rectangular Orifice Outlet from the Constructed Wetlands

In accordance with the provisions of the *Hydrology, Hydraulics, and Water Quality Report for University Glen Phase 2 at CSU Channel Islands* (Huitt-Zollars, Inc., 2017), the existing outlet from the constructed wetlands will be modified to ensure the proposed peak discharges are equal to or less than those under the existing condition, for the 10-, 25-, 50-, and 100-year storm events. As such, the existing culvert opening will be reduced in size from 10.3 feet wide x 2.8 feet high to 5.0 feet wide x 2.8 feet high, in order to achieve a discharge of 12.5 cfs during the 100-year storm scenario. These modifications are required to occur prior to occupancy of the first phase of the proposed project, in order to ensure that no phase of the project results in discharges exceeding current conditions.

Findings

The Board of Trustees finds that the above mitigation measure is feasible, is adopted, and will reduce the potential hydrologic-related impacts of the project to less than significant levels. Accordingly, the Board of Trustees finds that, pursuant to PRC Section 21081, subdivision (a)(1), and State CEQA Guidelines section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or avoid potentially significant hydrologic-related impacts of the project identified in the Final EIR.

Noise

Potential Significant Impacts

The main sources of noise during construction activities would include machinery used in site preparation and equipment used during building construction and paving. The project site is a vacant, graded area with paved roads and partitioning walls on site; therefore, no building demolition would be required, and site preparation and grading would be minimal. Construction would occur over a period approximately 26 months (see Table 4 in the EIR). Construction noise may reach up to 84 dBA at the nearest multi-family residences, 70 dBA at the community pool, 68 dBA at the single-family residences, and 57 dBA at the John Spoor Broome Library.

It should be noted that in order to provide a conservative estimate of construction noise levels, this analysis is based on line-of-sight sound attenuation and does not account for attenuating factors, like topography or noise impeding structures or vegetation, such as the residences, community facilities, and trees that are located within the University Glen community. Actual site conditions

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may decrease the noise levels at sensitive receptors below the levels shown, resulting in a conservative estimate of construction noise levels (see Table 32 in the EIR).

The existing residences nearest to the project site would experience temporary construction noise levels that exceed applicable construction noise thresholds. Given that the site was previously graded, it is unlikely that grading equipment would be used near sensitive receptors for a substantial duration of the construction period. Nevertheless, the analysis assumed that all types of construction equipment would be located as near as 70 feet from existing residences at some point during construction. During the Architectural Coating phase, the community pool and single-family residences located at a further distance from the project site would not experience construction noise that exceeds the threshold. In addition, the John Spoor Broome Library would not be exposed to construction noise levels that exceed the threshold. Therefore, project-related construction noise impacts would be less than significant with mitigation incorporated.

Mitigation Measures

N-1 (A) Construction Activity Timing and Disclosure

Construction activity shall be restricted to weekdays (Monday through Friday) between 7:00 AM and 7:00 PM, and on Saturday between 9:00 AM and 5:00 PM. No construction activity will be allowed on Sundays and local holidays. Loud activities should be scheduled between 8:00 AM and 5:00 PM, to the extent practicable, to avoid disturbance of the adjacent neighborhood during evening hours. Quiet activities (such as interior work after a building is enclosed and certain exterior activities) may be granted extended hours on request subject to acceptance by campus staff.

Information stating the restrictions regarding the hours of construction shall be provided to nearby residents by the applicant and shall be posted on-site. Signs shall be placed prior to commencement of, and throughout, grading and construction activities. All residences within the University Glen community will be notified, via mail or email, regarding the estimated timeline of all of the phases of the proposed project and the hours that construction activity can be performed. This notice will be sent two weeks prior to initial commencement of construction activity.

N-1 (B) Vehicle and Equipment Idling

Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use.

N-1 (C) Sound Control Curtains

Flexible sound control curtains shall be placed around all stationary equipment and jackhammers when in use, and shall be oriented to break line-of-sight between operating equipment and all visible residential receptors within line-of-sight of the equipment. The equipment area with appropriate sound control curtains shall be designated on building and grading plans. Equipment and shielding shall remain in the designated location until specified stationary equipment and jackhammers are no longer in use.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, are adopted, and will reduce the potential noise-related impacts of the project to less than significant levels. Accordingly, the Board of Trustees finds that, pursuant to PRC Section 21081, subdivision (a)(1), and State CEQA

Guidelines section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or avoid potentially significant noise-related impacts of the project identified in the Final EIR.

Recreation

Potential Significant Impacts

The proposed project includes the construction of several park and open space recreational areas, and a clubhouse. The construction of these facilities would occur within the project site boundaries. Access to the recreational facilities would be provided by paved pedestrian walkways and paved streets. The operations of the facilities would require minimal electricity since most are open park space, except for the clubhouse.

Impacts associated with construction of each of these facilities have been considered as part of the wider project analyzed in the EIR and the Initial Study prepared for the proposed project. Significant impacts have been identified in the areas of air quality, biological resources, geology and soils, noise, tribal cultural resources, and transportation and traffic. Mitigation measures required to reduce those impacts to less than significant levels would also address the contribution of the parks and recreation facilities to those impacts under this threshold. Once applied, impacts from the overall project, including the contribution of the recreational components of the proposed project, would then be reduced to a less than significant level.

Mitigation Measures

Mitigation measures identified in Section 4.2, *Air Quality*, Section 4.3, *Biological Resources*, Section 4.7, *Noise*, and Section 4.10, *Transportation and Circulation*, Section 4.11, *Tribal Cultural Resources*, as well as geology and soils within the Initial Study (Appendix A of the EIR) would address the recreation and parks components contribution to overall project impacts.

Findings

The Board of Trustees finds that the mitigation measures required under Air Quality, Biological Resources, Noise, Transportation and Traffic, Tribal Cultural Resources and Geology and Soils are feasible, are adopted, and will reduce the potential recreation-related impacts of the project to less than significant levels. Accordingly, the Board of Trustees finds that, pursuant to PRC Section 21081, subdivision (a)(1), and State CEQA Guidelines section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or avoid potentially significant recreation-related impacts of the project identified in the Final EIR.

Transportation and Circulation

Potential Significant Impacts

Analysis of intersections under Caltrans jurisdiction indicates that Caltrans thresholds would be exceeded under Existing (Year 2016) plus Project Conditions at the intersection of U.S. 101 Southbound Ramps/Ventura Boulevard as a result of project traffic. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

T-4 Signal Timing

The applicant shall request that Caltrans optimize cycle length and signal timing splits for the intersection of U.S. 101 Southbound Ramps & Ventura Boulevard. If required, the applicant shall pay a fair share proportion of the cost to implement this mitigation measure. The optimization to cycle length and signal timing shall be completed prior to occupancy of the first phase of residential construction.

Findings

The Board of Trustees finds that the above mitigation measure is feasible, is adopted, and will reduce the potential transportation and circulation-related impacts of the project to less than significant levels. Accordingly, the Board of Trustees finds that, pursuant to PRC Section 21081, subdivision (a)(1), and State CEQA Guidelines section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or avoid potentially significant transportation and circulation-related impacts of the project identified in the Final EIR.

Tribal Cultural Resources

Potential Significant Impacts

Round Mountain, located approximately one mile from the project site, is a tribal cultural resource under CEQA. Increased foot traffic in the area, including from people residing at the project site, could indirectly impact the archaeological site at Round Mountain as well as plants and animals living in the area that are considered important to the Chumash. Several species of medicinal plants are known to grow on Round Mountain and in the general vicinity. While access to Round Mountain is currently restricted by the University (marked as a no trespassing zone), not all hikers obey the signs limiting access. There is some limited potential that erosion caused by people accessing Round Mountain, including a potential increase in illicit hiking, could impact plants, animals, and archaeological sites located on and around Round Mountain.

The project site has previously been disturbed and graded. Previous grading activities did not uncover any archaeological, paleontological, or cultural resources, or any human remains. While the likelihood that intact archaeological resources or human remains are present in the surficial soil layer is low, the general project vicinity is considered sensitive by California Native Americans for Native American cultural remains due to the known presence of an ethnographic village site (*Satwiwa*), Round Mountain, and several nearby prehistoric archaeological sites of Native American origin. Therefore, the following mitigation measures would be required to address potentially significant impacts resulting from the potential to unearth or adversely impact previously unidentified tribal cultural resources.

Mitigation Measures

TCR-1 (A) Interpretive Signage

Interpretive signage shall be installed near the perimeter of the project site where it intersects with offsite trails and/or open space to inform people to stay on the walking trails, and to educate and inform the public on the sensitivity and sacredness of the project site and the general vicinity to the

Chumash people, the importance of leaving plants and animals in place, and of the potential to damage to cultural and natural resources by leaving the trail. The signage shall be written and designed in consultation with a Chumash tribal representative. The signage shall be installed as part of the proposed project.

TCR-2 (A) Tribal Cultural Resource Worker Environmental Awareness Program

Prior to the commencement of construction activities a qualified archaeologist and Chumash tribal representative shall provide a Worker Environmental Awareness Program (WEAP) for the general contractor, subcontractor(s), and all construction workers participating in earth disturbing activities. The WEAP training shall describe the sensitivity and sacredness of the area, the potential of exposing Native American cultural materials, the types of materials that may be encountered, and directions on the steps that shall be taken if such a find is encountered. This training may be presented alongside other environmental training programs required prior to construction. A WEAP acknowledgement form must be signed by all workers who receive the training.

TCR-2 (B) Archaeological and Native American Monitoring

In response the comments provided, the following measure has been added and replaces mitigation measure CR-1 in the Initial Study regarding discover of unanticipated archaeological resources.

Any project-related ground disturbing activities taking place within native soils, including but not limited to depths that exceed previous grading/site disturbance areas, shall be observed by a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology. If unanticipated cultural deposits are encountered, work shall stop and the California State University, Board of Trustees shall be notified. The qualified archaeologist shall assess the nature, extent, and potential significance of any cultural remains. If the resources are determined to be Native American in origin, the archaeologist shall consult with the California State University, Board of Trustees to begin Native American consultation procedures, as appropriate. If the discovery is determined to be not significant, work would be permitted to continue in the area. Potentially significant resources may require a Phase II subsurface testing program to determine the resource boundaries within the project site, assess the integrity of the resource, and evaluate the site's significance through a study of its features and artifacts. If, in consultation with the California State University, Board of Trustees, a discovery is determined to be significant, a mitigation plan would be prepared and carried out in accordance with State guidelines. If the resource cannot be avoided, a data recovery plan would be developed to ensure collection of sufficient information to address archaeological and historical research questions, with results presented in a technical report describing field methods, materials collected, and conclusions. Any cultural material collected as part of an assessment or data recovery effort would be property of the University and curated at a qualified facility as directed by the University.

Findings

The Board of Trustees finds that the above mitigation measures are feasible, are adopted, and will reduce the potential tribal cultural resource-related impacts of the project to less than significant levels. Accordingly, the Board of Trustees finds that, pursuant to PRC Section 21081, subdivision (a)(1), and State CEQA Guidelines section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or avoid potentially significant tribal cultural resource-related impacts of the project identified in the Final EIR.

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Section 3Findings on Less than Significant Impacts

Aesthetics and Visual Quality

Less than Significant Impacts

Existing Visual Character

Although the proposed project would alter views of the project site, the resulting character and quality of the project site would be consistent with the surrounding area and existing development at the University and would not block views of the scenic features in the area, namely the surrounding hills and ridgelines. Therefore, impacts would be less than significant.

In addition, the proposed project would result in new sources of light and glare at the project site. However, these light and glare sources would be similar to those at existing development in the vicinity of the project site and would be required to comply with University Design Guidelines aimed at avoiding impacts from light and glare associated with new development. Therefore, impacts would be less than significant.

Cumulative Impacts

The cumulative study area of the proposed project area includes the southeastern edge of the Oxnard Plain, in the vicinity of Calleguas Creek. The aesthetic condition in this area is not expected to undergo major changes within the buildout period of the Campus Master Plan and Specific Reuse Plan based on existing development potential in the various General Plans that apply in this area and local initiatives restricting the conversion of large areas of open space and agricultural resources (i.e. Save Open Space and Agricultural Resources [SOAR]).

The proposed project, in combination with planned development on the CSUCI campus under the Master Plan and Specific Reuse Plan and elsewhere in this part of Ventura County, some of which is identified in the Cumulative Development list considered in the EIR, could contribute to the degradation of the visual character and quality of the cumulative study area. The projects included in the cumulative development scenario are primarily in the city of Camarillo and would contribute to the existing urban environment in that area but would not alter the rural aesthetic of the cumulative study area or the visual setting of the University, which is one of compact, aesthetically-coordinated development in its own independent setting. As such, cumulative aesthetic and visual impacts would be less than significant.

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant.

Findings

The Board of Trustees finds that the project will have a less than significant impact on visual character and light and glare; therefore, no mitigation is required.

Air Quality

Less than Significant Impacts

Population Growth

The VCAPCD provided a 2016 population estimate for unincorporated Ventura County of 99,433 people and a 2025 forecast of 108,233 taken from the adopted 2008 Regional Transportation Plan (RTP) forecast for the Southern California Association of Governments (SCAG), as recommended for use by VCAPCD. The proposed project would provide new dwelling units for approximately 1,518 residents, based on an average household size of 3.21 for single-family residences and 2.36 for multi-family residences, over the existing population in the county. This is estimate is based on Ventura County Municipal Code, Section 8209-6.3, *Additional population generated by subdivision*. Therefore, the proposed project would increase the current unincorporated county population to 100,951, which falls within the 2008 RTP projection for 2025 and also within the 2016 RTP/Sustainable Communities Strategy (SCS) population forecast of 102,000 for 2020. As the proposed project would not cause the population of unincorporated Ventura County to exceed population forecasts, the proposed project would be consistent with the VCAPCD Air Quality Management Plan (AQMP) and would meet the VCAPCD Guidelines significance criterion regarding population impacts. Impacts would be less than significant and no mitigation would be required.

Carbon Monoxide (CO) Hotspots

Areas with high vehicle density, such as congested intersections, have the potential to create high concentrations of CO, known as CO hotspots. A project's localized air quality impact is considered significant if CO emissions create a hotspot where either the California one-hour standard of 20 parts per million (ppm) or the federal and State eight-hour standard of 9.0 ppm is exceeded. This typically occurs at severely congested intersections (level of service [LOS] E or worse). According to the VCAPCD, a CO screening analysis should be conducted for intersections that would be significantly affected by a project and that experience, or are anticipated to experience, level of service (LOS) E or F. Based on a traffic impact analysis prepared for the proposed project, the intersections near the project site currently experience LOS D or better and the proposed project would not reduce intersections to a LOS E or F. Therefore, the proposed project would not result in a CO hotspot and no mitigation is required. Impacts would be less than significant.

Toxic Air Contaminants (TACs) and Diesel Particulate Matter (DPM)

The proposed project would involve the construction of a residential community on a 32-acre (1,394,000 sf) site. Operation of residential uses would not result in significant emission of TACs, and the project site is not located in the vicinity of a major stationary source of TACs. Construction of the proposed project would utilize diesel-engine equipment that would emit DPM, particularly during site preparation and grading. Residences are located to the south of the western half of the project site, across Channel Islands Drive. The nearest residential buildings to the project site are located approximately 65 feet from the project site boundary.

Project construction activities are not anticipated to result in levels of DPM at adjacent residences that would result in significant health impacts to sensitive receptors. The project site would employ at most seven to eight pieces of diesel-engine equipment each day during site preparation and grading, according to CalEEMod defaults, and maximum daily on-site emission of particulate matter from construction vehicle exhaust would reach approximately five pounds per day during site

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preparation and grading (see Appendix D in the EIR). Importantly, grading and site preparation is anticipated to take 110 days, i.e. less than four months. Thus, long-term exposure to DPM that could result in more serious long-term health effects, such as cancer and impacts to the reproductive system, would not occur.

Due to the small magnitude of DPM emissions that would be generated during construction, the attenuation of emissions by distance and wind direction, and the temporary duration of construction activities, potential TAC impacts due to DPM emissions would be less than significant. No mitigation would be required.

Cumulative Impacts

The air basin is currently in non-attainment for the State PM_{10} standard and the State and federal ozone standard. The proposed project, in combination with pending and approved development on the CSUCI campus and elsewhere in Ventura County, (see Table 6 in EIR), could contribute to the cumulative degradation of regional air quality through construction, operation, and by facilitating population growth.

However, the significance criteria set by the VCAPCD take into consideration both individual and cumulative impacts. Therefore, individual projects that do not exceed significance criteria would not jeopardize attainment of State and federal standards in the Ventura County region and would not contribute significantly to existing air quality exceedances. With implementation of the required mitigation measure, long-term operation of the proposed project would not exceed daily operational thresholds for ROC of NO_x, be inconsistent with Ventura County AQMP, or cause the existing population to exceed population forecasts. Impacts related to Valley Fever would occur in the immediate vicinity of the project site during construction only and would not contribute to cumulative impacts..

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant.

Findings

The Board of Trustees finds that the project will have a less than significant impact on air qualityrelated population growth, CO hotspots, TACs and DPM, and air quality-related cumulative impacts; therefore, no mitigation is required.

Biological Resources

Less than Significant Impacts

Cumulative Impacts

Per the 1998 Campus Master Plan Final EIR and 2000 Revised Campus Master Plan Final Supplemental EIR, urban and agricultural development of the Oxnard Plain has essentially eliminated the natural communities that once existed within the lowland areas. The western portion of the Santa Monica Mountains, however, has not been developed and large land holdings in this area are within permanent open space conservation easements. As described in the Campus Master Plan Final EIR, reuse of the area as a University campus with limited ancillary development of previously disturbed areas, of which the proposed project is a part, would act to conserve the remaining natural communities within the property. Nonetheless, development of other areas within the Calleguas Creek watershed would result in further significant habitat losses.

As shown in the Campus Master Plan, the development of University Glen Phase 2 is one of the final areas of development proposed at the University outside of the main campus area and was considered as part of the cumulative project scenario in the previous CEQA documentation for the University and would assist in completing the development program previously envisioned in the Campus Master Plan. In addition, the University has undertaken a program of habitat restoration and conservation at the campus that would reduce the cumulative effect of loss of jurisdictional waters due to the proposed project and development at the campus as a whole. As shown in Table 6 in the EIR, the majority of reasonably foreseeable planned and future projects in the vicinity of the project site would occur in and around the urbanized area of the city of Camarillo. Therefore, while impacts to biological resources resulting from cumulative projects in the region could be significant, given the existing disturbed nature of the project site, the availability of compensatory habitat and the limited potential for impacts to special status species, the proposed project's contribution to the cumulative impact would not be considerable.

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant.

Findings

The Board of Trustees finds that the project will have a less than significant impact on biological resource-related cumulative impacts; therefore, no mitigation is required.

Greenhouse Gas Emissions

Less than Significant Impacts

Construction and Operational Greenhouse Gas Emissions

Development of the proposed project would generate additional GHG emissions beyond existing conditions due to construction activity and long-term operations. However, the total estimated GHG emissions (3.9 metric tons CO₂e per person) would not exceed SCAQMD Tier 4 (4.8 metric tons CO₂e per person) or project-specific target efficiency metric (7.1 metric tons per person). Impacts would be less than significant.

Greenhouse Gas Reduction Goals

GHG emissions generated by the proposed project would fall below the SCAQMD Tier 4 significance threshold of 4.8 MT CO₂e per person. Therefore, the proposed project would be consistent with these local and State policies. The proposed project would also be consistent with regional policies to reduce GHG emissions through strategic housing and transportation growth embodied in the SCAG RTP/SCS. SCAG published its first RTP/SCS for the 2012-2035 planning period and more recently adopted an RTP/SCS for the 2016-2040 planning period on April 7, 2016. Since the project would be consistent with local, regional, and State policies to reduce GHG emissions, would be

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constructed in accordance with CALGreen building standards, and would comply with other environmental regulations that contribute to GHG reductions (e.g., AB 939), the project would not conflict with any applicable plans or policies to reduce GHG emissions and impacts would be less than significant.

Cumulative Impacts

Since the vast majority of individual projects do not generate sufficient GHG emissions to directly influence climate change, analysis of GHG emissions under CEQA is inherently an analysis of whether a project's emissions would be cumulatively considerable. As the proposed project would be consistent with local and regional thresholds for GHG emissions, which consider cumulative local and regional emissions, as well as AB 32 and SB 32, which consider cumulative statewide emissions, the proposed project would not result in a considerable contribution to cumulative emissions of GHGs.

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant.

Findings

The Board of Trustees finds that the project will have a less than significant impact on Construction and Operational Greenhouse Gas Emissions, Greenhouse Gas Reduction Goals, and GHG-related cumulative impacts; therefore, no mitigation is required.

Hydrology and Water Quality

Less than Significant Impacts

100-Year Burn Storm Event

The analyses included in the Huitt-Zollars (2017) report demonstrate that the proposed project would have no hydraulic impacts on properties and proposed infrastructure would be sufficient to convey stormwater flows. Hydraulic analyses confirm that the existing Storm Drain Line A (72-inch reinforced concrete pipe [RCP]) and Storm Drain Line E (96-inch RCP) are adequately sized and are consistent with Ventura County Watershed Protection District (VCWPD) design criteria and that proposed Storm Drain Lines B, C, and D would provide adequate capacity consistent with VCWPD criteria. However, the existing culvert underneath the Inspiration Point crossing would overtop in a 100-year burn storm event and is proposed to be redesigned as part of the proposed project to ensure the safety of adjacent properties, as discussed below.

The under-capacity culvert was identified in 2007, during development of plans for an improved culvert associated with the previous development proposal at the site. Proposed improvements included as part of the proposed project are:

- An 11.14-foot by 7.25-foot Corrugated Steel Pipe-Arch Culvert that runs for a longitudinal distance of 29.3 feet.
- A proposed vertical alignment of the Inspiration Point crossing with a sag elevation of 114.99 feet NGVD29.

Therefore, the proposed project would not result in an exceedance of the capacity of existing or planned stormwater drainage systems, resulting in a less than significant impact.

Cumulative Impacts

The cumulative study area for hydrology and water quality is defined as the Calleguas Creek Watershed, because potential impacts to hydrology and water quality associated with the proposed project would be limited to this watershed. Cumulative projects in the region would include new residential and non-residential developments. The majority of reasonably foreseeable planned and future projects would occur in and around the urbanized area of the city of Camarillo. The project site is surrounded by open space (hillsides) and agriculture; these areas are not planned for development and there are no cumulative projects proposed for the sites adjacent to the project site (see Figure 27 in the EIR). Some cumulative development could occur in portions of the Calleguas Creek Watershed; however, as discussed previously, improvements to the outlet at the constructed wetland area included as part of the project design would ensure that flows exiting the project site following project implementation would be the same as flows exiting the project site under existing (pre-project) conditions.

Therefore, implementation of the proposed project would not contribute to the cumulative scenario, and potential impacts to hydrology and water quality related to the proposed project would not be cumulatively considerable.

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant.

Findings

The Board of Trustees finds that the project will have a less than significant impact during a 100-Year Burn Storm Event and hydrology and water quality-related cumulative impacts; therefore, no mitigation is required.

Noise

Less than Significant Impacts

Groundborne Vibration

Construction-related activities associated with the proposed project would intermittently generate groundborne vibration on and adjacent to the project site. This may affect existing sensitive receptors near the project site; however, construction vibration would not exceed Federal Transit Administration (FTA) thresholds for vibration. Therefore, this impact would be less than significant.

Project-Generated Traffic Noise

Implementation of the proposed project would result in an increase in the average number of daily vehicle trips along the segments of Channel Islands Drive, south and west of the project site. The Traffic Impact Study for the CSU Channel Islands Specific Reuse Plan Update prepared for the proposed project (see Appendix I in the EIR) determined the existing traffic levels on Channel Islands

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Drive, as well as the traffic levels expected as a result of the proposed project. These traffic levels were used to determine existing and potential future sound levels at sensitive receptors along Channel Islands Drive.

The addition of project-generated traffic would increase traffic noise levels on Channel Islands Drive adjacent to the project site by between 0.1 and 0.5 dBA Ldn (A-weighted sound pressure level; Day-Night Average Level). These projected noise levels would not exceed the applicable FTA noise increase thresholds.

The manner in which newer homes in California are constructed (within the last 30 years) generally provides a reduction of exterior-to-interior noise levels of about 30 dBA with closed windows. As a result, the interior noise level at existing residences along Channel Islands Drive would not experience a perceptible change in interior noise levels as a result of roadway noise. Therefore, sensitive receptors along Channel Islands Drive would not experience a substantial increase in roadway noise conditions, or an exceedance of applicable interior noise standards. Therefore, roadway noise from project-generated traffic would not result in a significant impact.

Cumulative Impacts

The geographic extent for the analysis of cumulative stationary noise impacts is generally limited to areas within 0.5 mile of a proposed project. This area is defined as the geographic extent of the cumulative noise impact area because noise impacts would generally be localized. Beyond this distance, impulse noise may be briefly audible and steady construction from the proposed project would generally dissipate such that the level of noise would reduce and/or blend in with the background noise level. There are no past, present or reasonably foreseeable future developments within 0.5 mile of the project site that would cumulatively increase the potential for exposure of people to increased stationary noise levels associated with construction and operation of the proposed project.

The proposed project would generate an increase in the average number of trips along the segments of Channel Islands Drive between Camarillo Street and Twin Harbor Drive. Existing residences located along Channel Islands Drive would not experience a change in roadway noise levels that would exceed the FTA thresholds under Cumulative (2022) + Project conditions. Therefore, cumulative noise impacts would be less than significant.

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant.

Findings

The Board of Trustees finds that the project will have a less than significant impact on groundborne vibration, project-generated traffic noise, and noise-related cumulative impacts; therefore, no mitigation is required.

Public Services

Less than Significant Impacts

Fire and Police Protection

Implementation of the proposed project would increase the service population for the Ventura County Fire Department (VCFD) and require police protection services from the University Police Department, but this increase would not trigger the need to construct a new fire station, police facilities, or alter existing facilities to accommodate additional personnel or equipment to maintain acceptable performance standards and levels of service. Therefore, the impacts related to fire protection and police protection services would be less than significant.

Cumulative Impacts

Fire Protection Services

This cumulative analysis considers the project in the context of the service area of the VCFD. The estimated current (year 2016) population of the unincorporated areas of Ventura County and the cities in the VCFD service area is approximately 494,673 based on current Department of Finance numbers. The 2016-2040 SCAG RTP/SCS provides a population forecast up to the year 2040. The forecasted (year 2040) population of the unincorporated areas of Ventura County and the cities serviced by the VCFD would include approximately 533,000 residents, indicating an increase of approximately 38,327 residents. The proposed project's population of 1,518 persons would represent approximately 4.0 percent of the population increase within the VCFD's service area.

The project, in combination with other past, present and reasonably foreseeable cumulative development, would result in an increase in demand for fire protection services. Although a new fire station is not anticipated at this time, if new facilities needed to be constructed in the future, appropriate environmental review would be required under CEQA, which would address impacts resulting from the new or expanded facility. Because the exact location of future facilities is currently unknown it would be speculative to evaluate their environmental impacts at this time.

Police Protection

This cumulative analysis considers the project in the context of the service area of the Ventura County Sheriff's Department, as this is the agency that would assist the UPD to serve the project site. The estimated current (year 2016) population of the Ventura County Sheriff's Department service area is approximately 360,333 based on current Department of Finance number. The forecasted (year 2040) population of the unincorporated areas of Ventura County and the cities serviced by the Ventura County Sheriff's Department would include approximately 398,400 residents based on the 2016-2040 SCAG RTP/SCS, indicating an increase of approximately 38,067 residents. The proposed project's population of 1,518 persons would represent approximately 4.0 percent of the population increase within the Sheriff's Department's service area.

The project, in combination with other past, present and reasonably foreseeable cumulative development, would result in increases in service population and resulting additional demand for police protection services. This could trigger the need to construct new or expanded police enforcement facilities to house the additional staff and equipment needed to serve this additional population, which could result in potentially significant physical impact on the environment.

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Although not anticipated at this time, if new facilities needed to be constructed in the future, appropriate environmental review would be required under CEQA. Furthermore, the potential location of future facilities is currently unknown and therefore it would be speculative to evaluate their environmental impacts at this time.

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant.

Findings

The Board of Trustees finds that the project will have a less than significant impact on fire and police protection service-related cumulative impacts; therefore, no mitigation is required.

Recreation

Less than Significant Impacts

Parkland Availability and Deterioration

The proposed project would increase the use of existing neighborhood and regional parks or other recreational facilities by increasing the population of the University Glen community. The increased demand would be met by existing parks and recreational facilities and those proposed as part of the project. Available parklands and proposed parklands would meet the minimum threshold of five acres of park land per 1,000 residents. Impacts would be less than significant.

The current available parks plus the parks proposed as part of the project would provide between 17.48 and 72.04 acres of parks, recreational facilities, and natural resource/open space for the residents to use for recreational purposes, meeting the minimum guideline of 16.5 acres to serve the future population of University Glen. Therefore, impacts related to the increased use of existing parks and recreational facilities, such that substantial physical deterioration would occur or be accelerated would be less than significant.

Cumulative Impacts

The proposed project would provide parks and recreation facilities in addition to those already provided at the CSUCI campus. The CSUCI campus is outside of the service radii of many of the community parks and recreational facilities located in the wider area. Therefore, the study area for the proposed project includes only those parks that would serve the campus, most of which are themselves outside the service radii of the cumulative development identified in the Draft EIR, with the exception of the future growth in campus population.

Additional University growth of 1,000 students is noted in the cumulative projects list. Adding this increase in population to the existing population at the campus (including students and University Glen Phase 1) plus the proposed project, the overall cumulative population at the University under the cumulative scenario would be 5,811, with 1,510 students currently residing in CSUCI student housing, 1,783 University Glen Phase 1 residents, a proposed project population of 1,518 and 1,000 additional students associated with future enrollment growth.

Based on this population and the guideline park acreage of five acres per 1,000 residents, park and recreation requirements would be 29 acres. The current available parks plus the parks proposed as part of the project would provide between 17.48 and 72.04 acres of parks. The low credit acreage (17.48 acres) does not provide any credit for the 339 acre University Park. Assuming a low five percent credit for this regional park resource for use by cumulative development at the campus, more than sufficient park land would be provided to meet the five acres per 1,000 residents guideline included in the Specific Reuse Plan. Impacts would be less than significant.

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant.

Findings

The Board of Trustees finds that the project will have a less than significant impact on parkland availability and deterioration and recreation-related cumulative impacts; therefore, no mitigation is required.

Transportation and Circulation

Less than Significant Impacts

Project-Related Intersection Operation Levels of Service

Implementation of the proposed project would not cause operations at study area intersections or segments to exceed applicable LOS criteria under Existing (Year 2016) plus Project conditions. Impacts would be less than significant.

Cumulative Development Intersection and Segment Operation Levels of Service

Implementation of the proposed project would not cause operations at any of the 11 study area intersections or any of the eight study area segments to exceed applicable significance criteria under the Cumulative (Year 2022) plus Project condition. Therefore, impacts would be less than significant.

Congestion Management Plan Roadway Network

The proposed project would not result in impacts to the Congestion Management Plan roadway network. The study area intersections would operate at LOS D or better; therefore, impacts are less than significant.

Caltrans Freeway Segments

An analysis of four Caltrans freeway segments to determine passengers per mile per lane and corresponding LOS indicates that these Caltrans locations operate at LOS D, exceeding Caltrans target thresholds under Existing (Year 2016) and Cumulative (Year 2022) without the proposed project conditions. Addition of project-related traffic would not result in further reductions to LOS on these freeway segments. Impacts would be less than significant.

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Queuing analysis of two Caltrans freeway off-ramps at Daily Road and Ventura Boulevard along U.S. 101 indicates that none of the freeway off-ramp queues forecasted would exceed the available storage under Existing (Year 2016) plus Project conditions or under Cumulative (Year 2022) plus Project conditions.

Emergency Access

The University Glen community does not currently have an adopted Emergency Evacuation Plan. In 2013, the Springs Fire caused severe congestion on roadways in the area and created a concern among existing residents about the time required to evacuate the University Glen community during an emergency. The proposed project would increase the population in this area, increasing the number of people required to evacuate the area should an emergency occur. The proposed project's Circulation Plan complies with Ventura County Fire Code in relation to the minimum road access standards. Therefore, impacts related to emergency access would be less than significant. However, in consideration of residents' concerns implementation of Mitigation Measures T-9(a) and (b) are recommended to further reduce this already less than significant impact.

Public Transit, Bicycle, and Pedestrian Facilities

The undeveloped project site does not contain existing public transit, bicycle, or pedestrian facilities. However, the project is located approximately 2.5 miles south of the city of Camarillo and is accessible from existing transportation facilities provided by VCTC from the CSUCI campus.

The Specific Reuse Plan contains guidelines directing the design of streets and roadways within the Community Development Area. The applicable guidelines in relation to public transit, bicycle, or pedestrian facilities are stated below:

- Automobile use should be discouraged in favor of bicycles and pedestrian paths.
- Roadway widths should be appropriate to their anticipated use, but should be minimized where ever possible.

Roadways within the project site would be designed in compliance with the requirements of the Specific Reuse Plan and consistent with Ventura County Fire Code and as such would be appropriate to their anticipated use. The proposed project does not include a bicycle path in the circulation plan. The site plan does provide for an interconnected network of sidewalks throughout the proposed project that would connect with pedestrian walkways throughout the University Glen Phase 1 area and wider CSUCI campus. Therefore, the proposed project would not conflict with policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities and impacts would be less than significant.

Hazardous Design Features

The proposed project's Circulation Plan would be consistent with Ventura County Fire Code in relation to the minimum road access standards. These standards are promulgated to protect current and future land owners by providing roads with sufficient accessibility for fire equipment and to reduce further roadway maintenance costs. Fire Code Section FP 14.6.5 VCFPD Access Standards would be incorporated into the design of the proposed project. Therefore, impacts related to an increase in hazards due to a design feature would be less than significant.

Cumulative Impacts

Cumulative development within the project area would cause increases in traffic on area roadways. As discussed under Cumulative Development Intersection and Segment Operation Levels of Service, above, the traffic analysis estimated an acceptable LOS of D or better at all intersections and roadway segments studied resulting in a less than significant cumulative impact. All future (2022) traffic impacts described in the above discussions consider cumulative project traffic growth.

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant. However the following measures are recommended to further reduce the already less than significant impact related to emergency access.

T-9 (A) Adopt an Emergency Evacuation Plan for the University Glen Community

The CSUCI Site Authority, in consultation with the University Glen community, University Police Department and the applicant, should prepare and adopt an Emergency Evacuation Plan prior to occupancy of the proposed project.

T-9 (B) Conduct Emergency Evacuation Drills

In addition to the drafting and adoption of the Emergency Evacuation Plan, a limited emergency evacuation drill for the University Glen community should be conducted on a regular basis with the required timing to be determined by the University Police Department.

Findings

The Board of Trustees finds that the project will have a less than significant impact on projectrelated intersection operation LOS, cumulative-related impacts to intersections and roadway segments, congestion management plan roadway network impacts, impacts to Caltrans freeway segments, emergency access, and public transit, bicycle, and pedestrian facility-related impacts; therefore, no mitigation is required though measures T-9(a) and T-9(b) are recommended.

Tribal Cultural Resources

Less than Significant Impacts

Cumulative Impacts

Past projects have resulted in cumulatively significant impacts on tribal cultural resources in the vicinity of the University and throughout the county as a result of demolition, destruction, relocation, or alteration of land. The same regulations that address archaeological resources have been used for tribal cultural resources, but due to concerns regarding their effectiveness, more recent regulations such as AB 52 have been implemented to provide more direct protections. Projects would be required to comply with AB 52, which would contribute to a reduction in cumulative impacts on tribal cultural resources. However, even with these regulations in place, cumulative projects in the county that are by right and do not require review under CEQA may not

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adequately address tribal cultural resources, and could potentially contribute to the cumulatively significant impact on such resources during clearing, grading, or construction activities. However, because the proposed project incorporates measures to reduce impacts to tribal cultural resources and the University has complied with the provision of AB 52, the proposed project's contribution to these impacts would not be considerable.

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant.

Findings

The Board of Trustees finds that the project will have a less than significant impact on tribal cultural resource-related cumulative impacts; therefore, no mitigation is required.

Utilities and Service Systems

Less than Significant Impacts

Potable and Recycled Water Use

The proposed project would increase demand for potable and recycled water through the introduction of up to 600 new residential units and landscaped areas. Recycled water and domestic water would be provided by the Camrosa Water District. Camrosa currently projects that it will have a surplus water supply of over 8,000 acre-feet per year through the year 2035. The proposed project is anticipated to require approximately 366.45 acre-feet per year, based on Camrosa design factors. Impacts would be less than significant.

Wastewater Generation

The proposed project would increase wastewater generation at the project site, but this increase would not require new or expanded treatment facilities and would not exceed treatment requirements. Impacts related to wastewater generation would be less than significant.

Cumulative Impacts

Water

This cumulative analysis considers the project in the context of the service area of the Camrosa Water District, as this is the agency that would serve the project. Camrosa anticipates sufficient water supply availability to accommodate the proposed project requirements as well as other anticipated development within the service territory. In addition, the demand from the proposed project would not exceed the daily demand value in the current water agreement in place between the University and Camrosa. Therefore, the proposed project would not contribute to significant cumulative impacts to water supply.

Wastewater

The proposed project would increase wastewater generation at the project site, in comparison with the previously entitled development; however, the increase would not require new or expanded treatment facilities and would not exceed treatment requirements. Therefore, the proposed project would not contribute to cumulative impacts regarding wastewater conveyance or treatment.

Mitigation Measures

Consistent with State CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant.

Findings

The Board of Trustees finds that the project will have a less than significant impact on potable and recycled water use, wastewater generation, and utility and service system-related cumulative impacts; therefore, no mitigation is required.

No Potential Impact

The Board of Trustees finds that, based upon substantial evidence in the record, including the NOP and IS, the project will result in no impact to the following environmental impact categories:

Agricultural Resources

- Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use
- Conflict with existing zoning for agricultural use or a Williamson Act contract
- Conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production
- Loss of forest land or conversion of forest land to non-forest use
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use
- A substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or

Biological Resources

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	impede the use of native wildlife nursery sites
	 Conflict with any local policies or ordinances protection biological resources, such as a tree preservation policy or ordinance
	 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan
Cultural Resources	 Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5
Geology and Soils	 Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater
Hazards and Hazardous Materials	 For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area
	 For a project near a private airstrip, would it result in a safety hazard for people residing or working in the project area
Hydrology and Water Quality	 Place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map
	 Place structures in a 100-year flood hazard area that would impede or redirect flood flows
Land Use and Planning	 Physically divide an established community
	 Conflict with an applicable habitat conservation plan or natural community conservation plan
Mineral Resources	 Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state
	 Result in the loss of availability of a locally

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important mineral resource recovery site

	delineated on a local general plan, specific plan, or other land use plan
Noise •	For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels
•	For a project near a private airstrip, would it expose people residing or working in the project area to excessive noise
Population and Housing	Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere
	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere
Transportation/Traffic •	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks

Section 4Feasibility of Project Alternatives

Project Alternatives

The alternatives section of the Final EIR contains an analysis of alternatives to the proposed project, including the "No Project" alternative. (For a detailed discussion of these alternatives, please see Section 6, *Alternatives*, of the Final EIR.) Based on the analysis, the Board of Trustees finds as follows:

No Project

With implementation of the No Project Alternative, the project site would remain under existing conditions, and activities would continue as they currently are. The visual character of the site would remain as a vacant site with partial improvements, similar to an unpaved parking lot. Expansive views of the surrounding ridgelines from the nearby roadways would remain. Additional development on the project site would not occur, and the site may continue to be used for purposes such as overflow parking for events on the CSUCI campus. As such, short-and long-term impacts associated with land use changes on the project site would generally not occur. No additional residents, employees, or visitors would be brought onto the project site as a result of the No Project Alternative, and impacts that are typically based on a per-capita generation would not occur under this alternative.

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The project site is currently disturbed by previous grading and leveling and the main project site (not including the Inspiration Point area) is regularly rotary de-weeded for use of the site for overflow parking. These activities would continue to occur under the No Project Alternative, which also would not include the implementation of stormwater drainage improvements proposed as part of the project; therefore, existing rates and patterns of stormwater runoff from the site would continue.

Overall, impacts resulting from the No Project Alternative would be less than for the proposed project or other identified alternatives.

Under this alternative the Specific Reuse Plan would not be amended. Also this alternative would not provide the envisioned land use of residential development identified in the Specific Reuse Plan. In addition, this alternative would not provide for higher density development near a major employment area. None of the project objectives would be achieved through implementation of the No Project Alternative.

This alternative is not feasible or desirable as it would not attain any of the basic objectives of the project, as defined in Section 1, above.

Previously Entitled Development

The Previously Entitled Development Alternative would implement the residential development previously entitled for the project site, consisting of 242 new single-family residential units. Under this alternative, the CSUCI Specific Reuse Plan would not be amended to allow for the additional 358 residential units that would occur under the proposed project, because the Specific Reuse Plan already allows for the 242 units included under the Previously Entitled Development Alternative. As such, the project site would remain designated for low to low-medium residential density (zero to 10 units per acre) development, and the 242 single-family units previously approved for the project site would be constructed.

Under Alternative 2 environmental impacts similar to those identified for the proposed project would occur, though for some impacts, such as in the areas of noise, transportation and circulation, and utilities and service systems, the magnitude would be lower for this alternative than the proposed project due to the development of 358 fewer residential units (242 units versus 600 units under the proposed project). However, with the exception of the impact to operational air quality, each of the impacts under this alternative would have the same level of significance (e.g. potentially significant, less than significant) and each of the required mitigation measures would apply to this alternative. Potential impacts would be relatively comparable for Aesthetics, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, and Tribal Cultural Resources, because the decreased intensity of residential development would generally not affect the characteristics of impacts to these issue areas. The same mitigation measures as are identified for the proposed project would be implemented for the Previously Entitled Development Alternative, with the exception of AQ-1 which would not be required. This alternative would meet housing demands of a growing campus population in a manner that would encourage use of alternative modes of transportation and minimize transit-related GHG emissions resulting from expected population growth, though not to the extent of the proposed project. This alternative would not, however, result in higher density residential development within a mile of a major suburban employment center, given that it would be comprised of relatively low density single family residential development. Therefore, with regard to consistency with plans aimed at reducing GHG emissions this alternative would be less preferable when compared to the proposed project.

No amendments or revised approvals to the existing CSUCI Specific Reuse Plan would be required under this alternative.

The Previously Entitled Development Alternative would not achieve the project objectives to:

- Provide multiple types of high-quality, local housing to attract faculty and staff to the CSUCI campus from outside the area.
- Provide age- and income-restricted housing to respond to the community request for a mixed demographic of apartments, single-family detached houses, and townhomes.

In addition, while this alternative would achieve the objectives of providing additional housing resources that blend with and augment the existing University Glen community to form one cohesive neighborhood and providing a live/work environment associated with the CSUCI campus, it would be to a lesser degree than the proposed project given the reduced number of residential units provided under this alternative.

This alternative is not feasible or desirable because it would result in generally the same level of impact as the proposed project but would not achieve several of the objectives of the project as described above and as defined in Section 1.

Elimination of Inspiration Point

The Elimination of Inspiration Point Alternative would implement the proposed project as assessed in the Final EIR, but would not include any changes in the Inspiration Point area of the northern project site, including improvements to the existing culvert located within the access road ("Inspiration Point Road") leading to this area. As with the rest of the project site, the Inspiration Point area is currently leveled (graded) with building foundations installed, as well as some retaining walls and ancillary improvements such as sidewalks and gutters. Under the proposed project, up to 11 single-family homes would be developed adjacent to the hillside within the Inspiration Point portion of the project site; under the Elimination of Inspiration Point Alternative, these 11 residential units would not be implemented. Under the Elimination of Inspiration Point Alternative, a total of 589 residential units would be developed, including 43 single-family detached houses, 66 townhomes, 310 market rate apartments and 170 income/age restricted residences.

Under this alternative, up to 589 of the proposed project's 600 residential units would be developed, avoiding the Inspiration Point area in the northern portion of the project site. As with the proposed project, implementation of the Elimination of Inspiration Point Alternative would require amendment to the existing CSUCI Specific Reuse Plan in order to allow the density of development proposed at the project site under this alternative.

Replacement of the existing culvert under Inspiration Point Road would not be implemented as part of this alternative, and the roadway and downstream area (where new residential units would be constructed) would continue to be subject to flooding hazards during large storm events. Potential less than significant impacts to natural biological habitat located on the Inspiration Point portion of the site would be avoided. In addition, impacts to jurisdictional waters would also be reduced, though these would remain potentially significant and mitigation would be required due to required improvements to the constructed wetland outlet.

Other potential impacts of the Elimination of Inspiration Point Alternative would be comparable to those associated with the proposed project, including in air quality, greenhouse gas emissions, noise, public services, recreation, transportation and utilities and public services, though incrementally lower than the proposed project due to the reduced population at the project site.

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Most of the objectives of the proposed project would be achieved but to a lesser degree than the proposed project due to the provision of up to 11 fewer residential units, as primary objectives of the project include the provision of local housing and a live/work environment associated with the CSUCI campus.

To the extent this alternative would result in potential flooding impacts due to the elimination of the improved culvert, this alternative may not attain all of the basic project objectives, as defined in Section 1, above, and, therefore, this alternative is neither feasible nor desirable.

Alternatives Considered but Rejected: Off-Site Alternatives

CEQA Guidelines section 15126.6 states that an EIR should consider alternate locations to the project if an alternate location would avoid or substantially lessen the project's significant environmental effects and would feasibly attain most of the basic objectives of the project. In this case, relocation of the project to another area outside of the CSUCI campus would not provide multiple types of housing or provide a live/work environment for the CSUCI campus, and would not meet project objectives. At this time, there are no alternative locations available with the appropriate land use designation for this type of development on the CSUCI campus. Therefore, alternative locations were eliminated from further analysis because they would not meet the objectives of the proposed project.