



*Protecting and Restoring the Santa Barbara Channel and Its Watersheds*

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April 20, 2006

Planning and Environmental Services Department  
130 Cremona Drive, Suite B  
Goleta, CA 93117

Attention: Laura Vlk

**Re: UPS Development Plan Amendment, 05-152-DP AM01 – 505 Pine Avenue**

Dear Ms. Vlk,

Please consider the following comments on the UPS Development Plan Amendment as referenced above, which are hereby submitted by Santa Barbara Channelkeeper. Santa Barbara Channelkeeper is a local non-profit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds, and we are actively involved in efforts to monitor and restore the Goleta Slough and its tributaries, including Old San Jose Creek.

Santa Barbara Channelkeeper is extremely concerned that the City of Goleta is considering a development plan amendment that will allow for the extension of a parking lot into Old San Jose Creek. According to the City of Goleta General Plan, the portion of Old San Jose Creek adjacent to 505 Pine Avenue is designated as an Environmentally Sensitive Habitat Area (ESHA). General Plan Conservation Element 1.6 clearly provides for the protection of ESHAs from significant disruption of habitat values. The replacement of several hundred feet of restorable, natural stream bank with fill and concrete paving is a significant disruption of habitat. According to CE 1.6, any land use, construction, grading, or removal of vegetation within an ESHA is explicitly prohibited with a few noted exceptions. The expansion proposed in the UPS development plan amendment does not fit the description of any exceptions noted in CE 1.6

Regardless of the current state of the stream bank and the proposed restoration included in this plan, this project will significantly impact ESHA habitat in several ways. Foremost, this plan preempts the restoration of the entire creek as it currently exists. Construction of a parking lot extension will result in the significant deposit of fill material within Old San Jose Creek causing water quality impacts and loss of habitat. Permeable stream banks and riparian vegetation provide for the infiltration of runoff and the filtering of pollutants. ESHA buffers are promoted by CE 1.8 of the Goleta General Plan to provide these benefits in addition to flood control benefits. This property currently has no ESHA buffer. Further replacement of stream bank with a parking lot will only cause additional significant water quality impacts.

**Because of these impacts and the encroachment of this project into an ESHA as identified in the General Plan, this project is NOT consistent with general plan and zoning ordinance**

**requirements. This project, therefore, is NOT categorically exempt from the California Environmental Quality Act under Section 15301. Channelkeeper strongly opposes this proposed action and demands that the Planning and Environmental Services Department deny the UPS Development Plan Amendment.**

Respectfully,

Ben Pitterle  
Watershed Programs Director  
Santa Barbara Channelkeeper