

4.13 Water Resources/Flooding

4.13.1 Existing Setting

The proposed Project is located on a mesa above the convergence of Carpinteria Creek and Gobernador Creek, with additional structures located on an intermediate terrace between the mesa and Gobernador Canyon Creek. Drainage from the campus is provided by two existing creeks. Surrounding each creek is a FEMA 100-year flood hazard zone which does not extend into the primary development areas.

4.13.2 Regulatory Setting

The federal water quality policies that apply to the proposed Project include:

- The *Clean Water Act (CWA)* prohibits discharge of pollutants into waters of the United States from any point source, unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The CWA requires states to adopt water quality standards for water bodies and have those standards approved by United States Environmental Protection Agency (USEPA).
- *CWA, Section 303, List of Water Quality Limited Segments* requires that the state adopt water quality standards for surface waters. If a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent.¹
- *CWA, Section 402, National Pollutant Discharge Elimination System* prohibits direct discharges of pollutants into waters of the U.S., except in accordance with the NPDES program established in Section 402 of the CWA. Non-point source discharges to storm water are regulated under storm water NPDES permits for municipal storm water discharges, industrial activities, and construction activities.
- *CWA, Sections 404 and 401* the U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged or fill material into waters of the U.S., which are those waters that have a connection to interstate commerce, either direct via a tributary system or indirect through a nexus identified in the USACE regulations.
- *Flood Insurance Rate Maps* issued by the Federal Emergency Management Administration divides flood areas into three zones: Zone A for areas of 100-year flood, base flood elevations not determined; Zone B for areas of 500-year flood; and Zone C for areas of minimal flooding. The National Flood Insurance Program 100-year floodplain is considered to be the base flood condition. This is defined as a flood event of a magnitude that would be equaled or exceeded an average of once during a 100-year period². Development in these floodplain areas are subject to the standard conditions of approval of the Santa Barbara County Flood Control and Water

¹ A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality.

² Floodways are defined as stream channels plus adjacent floodplains that must be kept free of encroachment as much as possible so that 100-year floods can be carried without substantial increases (no more than 1 foot) in flood elevations

Conservation District, and the requirements and development standards set forth in the County Flood Plain Management Ordinance (Chapter 15-A of the County Code) and the Development Along Water Courses Ordinance (Chapter 15-B of the County Code).

State water quality policies that apply to the proposed Project include:

- *State Water Resources Control Board (SWRCB)* ensures the highest reasonable quality for waters of the State, while allocating those waters to achieve the optimum balance of beneficial uses. Water quality *standards* are defined in each of the nine Regional Water Quality Control Board's (RWQCB) respective Basin Plan.
- The *California Porter-Cologne Water Quality Control Act* grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. This Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.
- *Water Quality Control Plan, Central Coast Basin (Basin Plan)* is the Central Coast RWQCB's adopted plan for its region of responsibility. For purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the hydrologic areas described in the Basin Plan. The Basin Plan also establishes implementation programs to achieve water quality objectives to protect beneficial uses and requires monitoring to evaluate the effectiveness of the programs.
- *State General Permit for Storm Water Discharges Associated with Construction Activity* (Construction General Permit; Order 2009-0009-DWQ; NPDES No. CAS000002 (*Construction General Permit*)) was adopted in 2009 by the SWRCB. In accordance with NPDES regulations, the State of California requires that any construction activity disturbing 1 acre or more of soil comply with the Construction General Permit.

County of Santa Barbara policies with requirements for water resources that apply to the proposed Project include:

- The intent of the *Santa Barbara County Integrated Regional Water Management Program (IRWMP)* is to promote and practice integrated regional water management strategies to ensure sustainable water uses, reliable water supplies, better water quality, environmental stewardship, efficient urban development, and protection of agricultural and watershed awareness.
- *County of Santa Barbara Storm Water Management Program (SWMP)* is prepared pursuant to SWRCB Water Quality Order No. 2003-005-DWQ, NPDES General Permit No. CAS0000004 Water Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Permit). The SWMP describes those BMPs that will reduce, control, or eliminate identified pollutants of concern.
- *County of Santa Barbara Comprehensive Plan; Land Use Element, Flood Hazard Area Policies* profiles the goals, policies, objectives, and implementation measures adopted by the County to limit the negative effects of flooding and demonstrate compliance with applicable state laws. The goals and policies applicable to this Project are listed below:
 - **Flood Hazard Area Policy 1:** All development, including construction, excavation, and grading, except for flood control projects and non-structural agricultural uses, shall be

prohibited in the floodway unless off-setting improvements in accordance with HUD regulations are proved. If the proposed developments falls within the floodway fringe, development may be permitted provided creek setback requirements are met and finish floor elevation are above the projected 100-year flood elevation, as specific in the Flood Plain Management ordinance.

- **Flood Hazard Area Policy 2:** Permitted development shall not cause or contribute to flood hazards or lead to expenditure of public funds for flood control work, i.e., dams, stream, channelization, etc.
- **Flood Hazard Area Policy 3:** All development shall be reviewed in accordance with the requirements of *County Code Chapter 15A-Floodplain Management* and *15B-Development along Watercourses*.
- *County of Santa Barbara Comprehensive Plan; Coastal Land Use Plan* establishes goals, policies, objectives, and implementation measures adopted by the County with the primary purpose of protecting and preserving resources potentially affected by any development located within the Coastal Zone. The goals and policies designed to protect and preserve water resources and limit flood hazards which are applicable to this Project are listed below:
 - **Policy 3-11:** All development, including construction, excavation, and grading, except for flood control projects and non-structural agricultural uses, shall be prohibited in the floodway unless off-setting improvements in accordance with HUD regulations are proved. If the proposed developments falls within the floodway fringe, development may be permitted provided creek setback requirements are met and finish floor elevation are above the projected 100-year flood elevation, as specific in the Flood Plain Management ordinance.
 - **Policy 3-12:** Permitted development shall not cause or contribute to flood hazards or lead to expenditure of public funds for flood control work, i.e., dams, stream, channelization, etc.
 - **Policy 3-14:** All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.
 - **Policy 3-15:** For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development, and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.
 - **Policy 3-16:** Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the Project site in conjunction with the initial grading operations and maintained throughout the development process to remove sediment from runoff waters. All sediment shall be retained onsite unless removed to an appropriate dumping location.

- **Policy 3-18: Provisions** shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained on-site whenever possible to facilitate groundwater recharge.
- **Policy 3-19:** Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.
- **Policy 9-37:** The minimum buffer strip for major streams in rural areas, as defined by the land use plan, shall be presumptively 100 feet, and for streams in urban areas, 50 feet. These minimum buffers may be adjusted upward or downward on a case-by-case basis. The buffer shall be established based on an investigation of the following factors and after consultation with the Department of Fish and Game and Regional Water Quality Control Board in order to protect the biological productivity and water quality of streams:
 - 1) soil type and stability of stream corridors;
 - 2) how surface water filters into the ground;
 - 3) slope of the land on either side of the stream; and
 - 4) location of the 100-year flood plain boundary.

Riparian vegetation shall be protected and shall be included in the buffer. Where riparian vegetation has previously been removed, except for channelization, the buffer shall allow for the reestablishment of riparian vegetation to its prior extent to the greatest degree possible.

- **Policy 9-38:** No structures shall be located within the stream corridor except: public trails, dams for necessary water supply projects, flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development; and other development where the primary function is for the improvement of fish and wildlife habitat. Culverts, fences, pipelines, and bridges (when support structures are located outside the critical habitat) may be permitted when no alternative route/location is feasible. All development shall incorporate the best mitigation measures feasible.
- **Policy 9-40:** All development, including dredging, filling, and grading within stream corridors, shall be limited to activities necessary for the construction of uses specified in Policy 9-38. When such activities require removal of riparian plant species, revegetation with local native plants shall be required except where undesirable for flood control purposes. Minor clearing of vegetation for hiking, biking, and equestrian trails shall be permitted.

4.13.3 Impact Analysis

This section reviews the analysis and mitigation measures from the Scoping Document and MND, as well as the Storm Drainage and Hydrology Report developed by MNS Engineers Inc. (2013) for the proposed Project, and discusses the water resource and flooding impacts associated with the proposed Project. Construction activities, the development of increased impermeable surfaces with

new buildings, and the new proposed drainage system under the proposed Project all have the potential to result impacts to water resource and flooding, these impacts are summarized below in Table 4.13-1.

Table 4.13-1. Summary of Water Resources and Flooding Impacts

Water Resources and Flooding	Mitigation Measures	Residual Significance
Impact WAT-1. Use of the drainage systems proposed by the Project would generate less than significant impacts to channelization of storm water flow, however drainage structures could pose a flood risk.	MM WAT-1	Less than significant with mitigation (Class II)
Impact WAT-2. The proposed Project would increase the amount of impervious surfaces at the site.	MM WAT-2	Less than significant with mitigation (Class II)
Impact WAT-3. Construction and operation of the proposed Project could result in a discharge of contaminants into a receiving body of water.	MM WAT-3a MM WAT-3b MM WAT-3c MM BIO-2c MM BIO-2d MM GEO-2	Less than significant with mitigation (Class II)
Impact WAT-4. Residential growth by the proposed Project would not generate adverse water demand impacts.	No mitigation required	Less than significant (Class III)
Impact WAT-5. Development of proposed Project would result in the removal of vegetation from the buffer zone along Carpinteria Creek.	None mitigation required	Less than significant (Class III)

4.13.3.1 Thresholds of Significance

Appendix G of the State CEQA Guidelines states that a project is considered to have a significant impact on hydrology and water quality if it would result in an impact on any of its listed criteria. The County has incorporated the CEQA Guidelines through its own set of thresholds for water resources to determine significance. For instance, a Project would generate a significant impact if its net new consumptive water use would exceed established threshold values which have been set for overdrafted groundwater basins.³ Moreover, a project is also deemed to have a significant effect on water resources if a net increase in pumpage from a well would substantially affect production or quality from a nearby well (County of Santa Barbara 2015). A significant water quality impact is presumed to occur if the project:

- a. Is located within an urbanized area of the county and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;
- b. Increases the amount of impervious surfaces on a site by 25 percent or more;
- c. Results in channelization or relocation of a natural drainage channel;

³ Consumptive water use is defined by total consumptive demand adjusted for recharge less discontinued historic use.

- d. Results in removal or reduction of riparian vegetation or other vegetation (excluding non-native vegetation removed for restoration projects) from the buffer zone of any streams, creeks or wetlands;
- e. Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB) Basin Plan, or otherwise impairs the beneficial uses⁴ of a receiving water body;
- f. Results in a discharge of pollutants into an "impaired" water body that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
- g. Results in a discharge of pollutants of concern to a receiving water body, as identified by the RWQCB.

4.13.3.2 Project Impacts

Impact WAT-1. Use of the drainage systems proposed by the Project would generate less than significant impacts to channelization of storm water flow, however drainage structures could pose a flood risk.

The proposed Project would not directly affect any water bodies through grading or construction, and would therefore not result in any significant changes in the course or direction of water movements in nearby creeks and drainages. As described in Section 2.6.2., Storm Water Management and Drainage Systems, the Project would direct the flow of water from the site to either on-site bioswales where infiltration and filtration could occur near the structure they are serving, or to one of two constructed storm water collection systems (see Figure 2-2). Both systems would involve constructed drainage channels and pipes to prevent the risk of erosion. Drainage from faculty residence structures and other development on the southern portion of the campus would flow through an 18-inch closed pipe to 14 storage detention tanks located near Gobernador Creek which would filter, drain and store water outside of any flood hazard zone. The proposed detention system would be adequately sized to mitigate 100-year peak storm water discharge increases resulting from all proposed Project development.

Drainage from western campus development would flow through 18 inch pipes to a detention basin and associated above- and below-ground storage tanks for water drainage within the agricultural parcel located west of Lillingston Canyon Road, adjacent to Carpinteria Creek. The above-ground detention basin for this western drainage system would be located outside of the 50-foot bank setback, predominantly outside of the flood hazard overlay area, which would minimize any impacts the detention basin would have on flood hazards. However, a small portion of the overall detention system would be located within the flood hazard overlay area. While the elements that are underground would not significantly alter the course or flow of flood water, the six 12,000-gallon above-ground storage tanks located within the flood hazard zone could present a flood risk and would therefore require additional review and approval by the County Water Agency, Flood Control District as described under MM WAT-1, *Storm Water Control Plan Approval*. Review and approval of the

⁴ Beneficial uses for the County of Santa Barbara are identified by the RWQCB in the Water Quality Control Plan for the Central Coastal Basin, or Basin Plan, and include (among others) recreation, agricultural supply, groundwater recharge, fresh water habitat, estuarine habitat, support for rare, threatened or endangered species, preservation of biological habitats of special significance.

Project's drainage system as required under MM WAT-1, *Storm Water Control Plan Approval*, would ensure that the Project would not contribute significantly to downstream flooding or expose people or property to flood hazards. Project related impacts to channelization and flood risk would therefore be reduced to *less than significant with mitigation* (Class II).

Impact WAT-2. The proposed Project would increase the amount of impervious surfaces at the site.

The Project would increase the amount of additional storm water runoff as a result of the additional impermeable surfaces (i.e., structures, driveways, patios, etc.). Overall, impermeable surfaces would increase by approximately 129,641 sf (2.98 acres). While this represents an approximately 15 percent increase over existing conditions, which is less than the County threshold of significance of a 25 percent increase, it exceeds County standards for treating storm water runoff as it equates to more than one acre of additional impervious surfaces. The Project would be required to treat storm water runoff consistent with County requirements under its NPDES General Permit.

Additionally, operation of the Project could decrease the quality and increase the quantity of storm water runoff. The additional use of fertilizers, pesticides, common cleaners, and chemicals are anticipated under the Project, and runoff from driveways and parking lots could introduce oil and other hydrocarbons into drainage facilities. This runoff would be directed to either onsite bioswales where infiltration and filtration could occur, or storm water collection systems with in-line filtration devices downslope from the main campus. In order to reduce potential impacts from increased impervious surfaces, the Project would require mitigation of implementation of a Stormwater Control Plan (SCP), MM WAT-1, *Storm Water Control Plan Approval*, and MM WAT-2, *Stormwater Control Plan – Project Operation*, which would include best management practices for design and field components on land use, grading, building, and landscape plans as applicable with ongoing monitoring. Consequently, impacts to water quality associated with the increased area of impermeable surfaces and associated surface runoff would be *less than significant with mitigation* (Class II).

Impact WAT-3. Construction and operation of the proposed Project could result in a discharge of contaminants into a receiving body of water.

Construction activities such as grading and ground disturbance associated with development of the Project could result in short-term erosion and sedimentation into nearby creeks and drainages and the introduction of construction-related pollutants (e.g., concrete washout, oil, heavy metals, etc.). Application of standard County grading, erosion, and drainage-control measures in the form of construction Best Management Practices (BMPs), and implementation of construction mitigation measures MM WAT 3a, *SWPPP*, MM WAT-3b, *Sediment and Contamination Containment*, and MM WAT-3c, *Erosion and Sediment Control Revegetation*, would reduce impacts of construction-related discharge of contaminants. In addition to these mitigation measures, implementation of MM BIO-2c, *Equipment Washout-Construction*, MM BIO-2d, *Equipment Storage-Construction*, and GEO-2, *Erosion and Sediment Control Plan*, would ensure that no significant increase of erosion or sediment-laden storm water runoff would occur and pollution transport would be minimized. Project-related impacts to contamination of receiving bodies of water from construction at the site would therefore be *less than significant with mitigation* (Class II).

Impact WAT-4. Residential growth from the proposed Project would not generate adverse water demand impacts.

The proposed Project is expected to increase the total student population from a cap of 280 to 300, increasing the number of students living on campus from 220 to 259. In addition to student population changes, the Project would also permit up to six additional faculty and staff.⁵ Water supply for this increase would continue to be provided by the Carpinteria Valley Water District which has adequate water supply to serve the Project (Intent to serve letter dated January 10, 2013). The increase in impermeable surfaces, especially as compared to the amount of pervious area within the Project site available for water infiltration, would have a negligible impact on local groundwater supplies. Further, the Project's drainage system design provides storage of surface runoff for use as irrigation for downslope avocado orchards, which would potentially reduce water usage associated with the orchard operations. The Project's impact on groundwater and water supplies is therefore *less than significant* (Class III).

Impact WAT-5. Development of proposed Project would result in the removal of vegetation from the buffer zone along Carpinteria Creek.

The development of the Project drainage system is expected to result in the removal of approximately 0.5 acre of avocado orchard located along Carpinteria Creek. The removal of avocado trees would not remove riparian vegetation that provides a substantial buffer to the creek and the facilities to be developed in that location would be storm water tanks and associated storm water infrastructure. This development would not impact the creek. Impacts to water quality would be *less than significant* (Class III).

4.13.3.3 Mitigation Measures

The following mitigation measures would reduce the Project's water and flooding resource impacts to a less than significant level:

MM BIO-2c, *Equipment Washout-Construction* would apply (see Section 4.3, *Biological Resources*).

MM BIO-2d, *Equipment Storage-Construction* would apply (see Section 4.3, *Biological Resources*).

MM GEO-2, *Erosion and Sediment Control Plan* would apply (see Section 4.6, *Geologic Processes*).

MM WAT-1 ***Storm Water Control Plan Approval.** The Applicant shall prevent storm water and flood risks through submittal, review and approval of all drainage and storm water control plans by the County Flood Control District prior to Zoning Clearance issuance:*

Plan Requirements and Timing. The Applicant shall ensure all drainage and storm water management plans are reviewed and approved by the County Flood Control District. County Flood Control District staff shall approve all applicable plans prior to Zoning Clearance issuance. Modifications to the plans shall be approved and be in place prior to commencement of construction.

Monitoring. The Applicant shall demonstrate compliance with these measures to Planning and Development compliance monitoring staff as requested during construction and upon Project completion.

⁵ Two additional maintenance staff, two additional faculty members, and two additional child care employees.

MM WAT-2 ***Stormwater Control Plan – Project Operation.** The Applicant shall submit and implement a Stormwater Control Plan designed to prevent the entry of pollutants from the Project site into the storm drain system after development. The Stormwater Control Plan shall identify:*

- a. A combination of structural and non-structural Best Management Practices (BMPs) from the Santa Barbara County Stormwater Technical Guide or other approved methods to retain storm water runoff and prevent potential pollutants that may affect the quality of the storm water discharges;*
- b. Design and placement of structural and non-structural BMPs to address identified pollutants consistent with the Stormwater Technical Guide;*
- c. Inspection and maintenance program for projects > 5,000 sf new or replaced impervious;*
- d. Method for ensuring ongoing maintenance of all BMPs over the life of the project for projects > 5,000 sf new / replaced impervious.*

Plan Requirements and Timing. The Applicant shall (1) submit the Stormwater Control Plan to Planning and Development and Public Works, Water Resources Division for review and approval prior to Zoning Clearance issuance; (2) include design and field components on land use, grading, building, and landscape plans as applicable; (3) post performance securities prior to Zoning Clearance issuance to ensure installation and maintenance. Stormwater Control Plan measures shall be constructed and operational prior to Final Building Inspection Clearance. The Applicant shall maintain the SCP components for the life of the Project and keep a record of maintenance and submit the maintenance record to Planning and Development compliance monitoring staff annually between October 1 and 31. The Applicant shall record a buyer notification prior to Zoning Clearance issuance that states: "IMPORTANT: BUYER NOTIFICATION" and contains the maintenance requirement language above.

Monitoring. The Applicant shall demonstrate to Public Works, Water Resources Division that the SCP components are in place prior to Final Building Inspection Clearance. The installation security shall be released upon satisfactory installation of all items in approved plans and the maintenance security shall be released after five consecutive years of satisfactory maintenance and maintenance reporting. Planning and Development compliance monitoring staff and Public Works-Water Resources Division staff will review required maintenance records.

MM WAT-3a ***SWPPP.** The Applicant shall submit proof of exemption or a copy of the Notice of Intent to obtain coverage under the Construction General Permit of the National Pollutant Discharge Elimination System issued by the California Regional Water Quality Control Board.*

Plan Requirements and Timing. Prior to issuance of Zoning Clearance the Applicant shall submit proof of exemption or a copy of the Notice of Intent and shall provide a copy of the required Storm Water Pollution Prevention Plan (SWPPP) to Planning and Development. The Applicant shall keep a copy of the SWPPP on the Project site during grading and construction activities.

Monitoring. Planning and Development permit processing planner shall review the documentation prior to Zoning Clearance issuance. Planning and Development compliance monitoring staff shall site inspect during construction for compliance with the SWPPP.

MM WAT-3b **Sediment and Contamination Containment.** *The Applicant shall prevent water contamination during construction by implementing the following construction site measures:*

- a. All entrances/exits to the construction site shall be stabilized using methods designed to reduce transport of sediment off site. Stabilizing measures may include but are not limited to use of gravel pads, steel rumble plates, temporary paving, etc. Any sediment or other materials tracked off site shall be removed the same day as they are tracked using dry cleaning methods. Entrances/exits shall be maintained until graded areas have been stabilized by structures, long-term erosion control measures or landscaping.*
- b. Apply concrete, asphalt, and seal coat only during dry weather.*
- c. Cover storm drains and manholes within the construction area when paving or applying seal coat, slurry, fog seal, etc.*
- d. Store, handle and dispose of construction materials and waste such as paint, mortar, concrete slurry, fuels, etc. in a manner which minimizes the potential for storm water contamination.*

Plan Requirements and Timing. The Applicant shall ensure all above construction site measures are printed as notes on plans. Planning and Development staff shall confirm that the plans reflect these notes prior to Zoning Clearance issuance. Stabilizing measures shall be in place prior to commencement of construction. Other measures shall be in place throughout construction.

Monitoring. The Applicant shall demonstrate compliance with these measures to Planning and Development compliance monitoring staff as requested during construction.

MM WAT-3c **Erosion and Sediment Control Revegetation.** *The Applicant shall re-vegetate graded areas upon completion of grading activities with deep rooted, native, drought tolerant species to minimize slope failure and erosion potential. Use hydroseed, straw blankets, other geotextile binding fabrics or other Planning and Development approved methods as necessary to hold slope soils until vegetation is established. Planning and Development may require the reseeded of surfaces graded for the placement of structures if construction does not commence within 30 days of grading.*

Plan Requirements and Timing. Include this measure as a note on all grading and building plans submitted for review and approval prior to Zoning Clearance issuance. The Applicant shall re-vegetate graded areas within 30 days.

Monitoring. The Applicant shall demonstrate compliance to grading and building inspectors and compliance monitoring staff in the field.

4.13.3.4 Residual Impacts

With application of mitigation MM WAT-1 through MM WAT-3c, as well as MM BIO-2c, *Equipment Washout Construction*, MM BIO-2d, *Equipment Storage Construction*, and MM GEO-2, *Erosion and Sediment Control Plan*, the proposed Project would insure that any water resources and flood risk would be reduced to less than significant. Therefore residual impacts would be *less than significant* (Class II).

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