CITY OF SANTA BARBARA

CALIFORNIA ENVIRONEMTNAL QUALITY ACT (CEQA) ADDENDUM TO:

FINAL PROGRAM ENVIRONEMTNAL IMPACT REPORTON
THE PROPOSED AIRPORT MASTER PLAN

State Clearinghouse No. 2014061096

Final EIR Certified July 2017

FOR AIRPORT GENERAL WESTERN AERO HANGARS OPTION 4 PROJECT

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SANTA BARBARA, CA 93117 (PLNXXX – XXXX)

November 28, 2023

This Environmental Impact Report (EIR) addendum is prepared in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15164. An addendum to a previous EIR may be prepared if only minor changes or additions are necessary to make the prior document adequate for the current project and the changes involve no new significant impacts or impacts substantially greater than previously identified in the EIR.

The CEQA Guidelines provide that an EIR addendum need not be circulated for public review but is attached to the EIR. The decision-making body considers the addendum together with the certified EIR when making a decision on the current project.

PROJECT STATUS

The Airport General Western Aero Hangars Option 4 Project (Project) seeks to address decreased functionality of two hangars due to their age and the City of Santa Barbara (City) is considering two sub-options facilities management directions options. The Project was proceeded by consideration of three prior facilities management options, these are as follows, Option 1 full demolition of both Hangars; Option 2 restoration and rehabilitation of both Hangars at their currently location; and Option 3 relocation of both Hangars and rehabilitation in a new location. The proposed project under consideration in the EIR addendum in Option 4, sub-option a; and (4) considered deconstruction of Hangar 248 and use of salvaged historic materials to rehabilitate Hangar 249 at the current location; or sub-option b deconstruction of Hangar 248 and use of salvaged historic materials to rehabilitate Hangar 249 at a new location on the Airport property outside of the flood plain. Options 1 through 3 were evaluated in the Airport Master Plan EIR (SCH No. 2014061096) therefore those three Options will not be evaluated in this EIR addendum. Only Option 4's two sub-options are analyzed in this addendum below. As such, once all options have been analyzed for environmental impacts, the City can present all four Options to decision makers for selection.

PRIOR ENVIRONEMTNAL DOCUMENTS

EIR (SCH No. 2014061096) was prepared in support of the City's Santa Barbara Airport Master Plan and was certified in July of 2017. The EIR was a programmatic environmental assessment of the Airport Master Plan and provides a framework that will guide site-specific future Airport actions.

The Initial Study concluded that many impact categories would not be significantly impacted by the Airport Master Plan or had already been comprehensively discussed and mitigated in the City's Final General Plan EIR (SCH No. 2009011031). However, potentially significant impacts could have occurred because of the Airport Master Plan for the following resource areas: Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology, Water Quality and Flooding, Land Use and Planning, Public Utilities (Solid Waste Disposal only) (Cumulative), and Transportation/Traffic (Cumulative). Greenhouse Gases (GHG) analysis was not required previously and has been added to this addendum's discussion.

BACKGROUND

The General Western Aero Corporation hangars are two airplane Hangars 248 and 249, that were constructed together to support the General Western Aero Corporation when the company relocated its airplane factory to the fledgling Santa Barbara-Goleta Airport. The companion hangars, built alongside machine shops and an administration building, are located approximately 100 feet apart and are of the same design. None of the other original buildings remain. Hangars 248 and 249 were conceptualized at the same time and are nearly identical in workmanship, material, and design. While both hangars require repair and structural stabilization, Hangar 248 is visibly and structurally in worse condition.

CURRENT PROJECT DESCRIPTION

Two Hangar buildings, Hangar 248 and Hangar 249 are in the northeast corner of the Santa Barbara Municipal Airport (Attachment 1 – Vicinity Map). The prior EIR evaluated three potential project options of how to address the declining Hangars. Option 1 involved historical documentation of the existing Hangars before demolishing them both and paving the area for open field aircraft storage. Option 2 called for the restoration or rehabilitation of both Hangars in their current location and to continue to use the Hangars as airplane storage. Option 3 included relocation of both Hangars outside of the floodway, though still within the 100-year flood plain and then rehabilitate the Hangars for a new use which has yet to be determined. As noted above, Options 1 through 3 were previously analyzed under the prior EIR, therefore, the purpose of this EIR addendum focuses only on analyzing Option 4 which was not previously evaluated under CEQA. The two Hangar buildings 248 and 249 are located in the northeast corner of the Santa Barbara Airport (See Vicinity Map). These hangars were previously evaluated by Lenvik & Minor Architects in 2001. The Airport's objective at that time was to evaluate two alternatives: A) Restoration in the same location, which was housing small aircraft; or B) Adaptive reuse of the hangars as an aviation museum, visitors center, conference rooms, and children's educational center relocating them to Hartley Place.

A 2023, Lenvik & Minor Architects report "*Santa Barbara Airport General Western Hangars Project Constraints Analysis"* evaluated four options; this EIR addendum focuses only on Option 4, the one option not previously evaluated under CEQA. Option 4 assumes reconstruction of Hangar 248 and reuse the available salvaged historic materials to rehabilitate Hangar 249, variations in Option 4 are as follows.

- Option 4, sub-option a: would salvage parts of Hangar 248 to rehabilitate and restore in place Hangar 249, which would remain as airplane storage, and former footprint of Hangar 248 and its surrounding area would be paved for outdoor airplane storage.
- Option 4, sub-option b: would salvage parts of Hangar 248 to rehabilitate Hangar 249 and relocate it to another site outside of the floodway for a new use yet to be determined and after relocation of Hangar 249 and removal of Hangar 248, the remaining area would be paved for outdoor airplane storage.

Hangars 248 and 249 were conceptualized at the same time and are nearly identical in workmanship, material, and design (Attachment 2 - LMA Architects, August 24, 2023), Both Hangars require repair and structural stabilization, however, Hangar 248 is visibly and structurally in worse condition. Hangar 248 is in poor condition and requires more substantial repair work and flood adaptation measures than are needed at Hangar 249. The damage to Hangar 248 is so advanced that most of its historic materials cannot be repaired, and instead would need to be removed and replaced. This damage negatively affects the Hangar's integrity, particularly the aspects of workmanship, materials, and design. Depending on the extent of material replacement and the cumulative effects on integrity, a rehabilitated Hangar 248 could only marginally suggest its historic significance. With careful dismantling of Hangar 248 and reusing its salvageable historic materials to rehabilitate Hangar 249, the Project would result in one Hangar that more fully represents the historic significance of the two Hangars. The Project would jointly preserve the rare local building type and represent the Hangars' period of historic significance.

CHANGES IN ENVIRONEMTNAL CIRCUMSTANCES

There have been no substantial changes in existing environmental conditions since certification of the EIR in 2017.

ANALYSIS OF PROJECT IMPACTS AND MITIGATIONS

This addendum analyzes the impacts of Option 4, sub-options a and b, for each resource area as compared to the existing baseline condition of the hangars. Staff determined that the CEQA impact areas most potentially affected by the Project include air quality/greenhouse gases, biological resources, geologic/soils, hazards/hazardous materials, cultural resources, historical resources, hydrology, water quality and flooding, and land use and planning, as discussed below.

Air Quality and Greenhouse Gas: The previous EIR identified one impact related to construction and/or demolition.

Impact AQ-2: Construction of recommended Master Plan projects would result in emissions of pollutants due to grading, fumes, and vehicle exhaust. Diesel-and gasoline- powered construction equipment emits particulate matter (MP_{10} and $MP_{2.5}$), nitric oxide (NOx), and Reactive Organic

Compound (ROC). For emissions from construction equipment to be considered a potentially significant environmental impact, combined emissions from all construction equipment would need to exceed 25 tons of any pollutant (except CO) within a 12-month period. Therefore, this comparative analysis must occur as specific development projects are proposed, and the construction schedule and equipment inventories can be estimated. The City has also adopted CEQA thresholds related to the exposure of sensitive receptors, such as children, the elderly, or sick people, to substantial pollutant concentrations and the creation of nuisance odors inconsistent with Santa Barbara County Air Pollution Control District (APCD) regulations. The City's CEQA Guidance criteria also state that substantial unmitigated nuisance dust during earthwork or construction operations should not occur. At the closest residence, located almost 0.2 mile away, pollutant concentrations or odors related to construction equipment or activities would not be significant. Dust, however, can migrate over considerable distances during windy conditions. The potential for dust generation during construction of Option 4's two sub-options and b would be substantially similar. Under Sub-option a, limited earth moving activities would be necessary for disassembling Hangar 248, repaving of Hangar 248's footprint with asphalt. Under sub-option b, the relocation of the Hangar 248 would also require limited earthwork to grade the new building pad prior to construction.

Substantial Changes With Respect to the Circumstances Under Which the Project is Undertaken/New Information of Substantial Importance: There are no substantial changes with respect to circumstances under which the Approved Project is undertaken, and there is no new information of substantial importance that has become available relative to air quality or greenhouse gas (GHG) emissions. The Court of Appeal in *Citizens for Responsible Equitable Envtl Dev. V. City of San Diego* (2011) 196 Cal. App. 4th 515, 531 specifically found that the effect of GHG emissions on climate change does not constitute "new information" with respect to a project that was evaluated in a prior EIR. (see also *Citizens against Airport Pollution v. City of San Jose* (2014) 227 Cal App 4th 788.

Result AQ-2: Air quality and dust control is addressed in the City's Standard Conditions of Approval and is required by City Building Code provisions (Santa Barbara Municipal Code [SBMC] section 22.04.020 J112, Dust Control) and would be adhered to through all grading, hauling, and construction activities related to the Airport. The Airport Master Plan EIR, included programmatic measures intended to fully mitigate potential construction impacts to a less than significant level. Thus, construction or demolition-related air quality impacts would be Class II, Less than Significant Impact with Mitigation.

The City's Standard Conditions of Approval Applicable to Project for dust control and other construction-related emissions will be applied to the Project, as appropriate. APCD permits will be applied for and received prior to commencement of demolition or construction activities.

Mitigation Measures for Air Quality Impact AQ-2.

AQ/mm-1: As a condition of approval, all construction and/or building removal actions shall be required to estimate said Project's combined emissions from all construction equipment to ensure

that the Project would not exceed 25 tons of any criteria pollutant except CO within a 12-month period. Standard equipment exhaust mitigation measures recommended by the APCD for such projects shall be implemented, as appropriate.

AQ/mm-2: The following programmatic measure will be incorporated into the Mitigation Monitoring and Reporting Plan for the Project. This measure will reduce potential air quality impacts (construction-related) of the Project to a less than significant level.

Conclusion: Option 4 sub-options a and b, both involve the careful and strategic dismantling of Hangar 248 to reuse the building's historic materials in adaptive reuse to rehabilitate Hangar 249. The Project has no potential to exacerbate air quality impacts beyond those previously analyzed in the previous EIR. The Project will comply with all mitigation measures for air quality impacts (construction-related) to a less than significant level.

Biological Resources: For the Option 4 sub-options a and b, the City's Master Environmental Assessment (MEA) identifies habitats, important wildlife areas, key riparian bird habitat areas, and sensitive species points. The prior EIR evaluated and mapped the biological study area noting the location of special status species and their associated habitats. The Project is outside of the biological survey area. The two hangars are adjacent to Hydrophytic and Halophytic Vegetation Series/Upland Vegetation Series supported by the San Pedro Creek located to the east of Hangar 249. No activities are proposed under Option 4's sub-options to directly impact this habitat series by crossing into this area or directly trimming native vegetation communities as part of the proposed Project's construction activities.

The previous EIR identified one impact to adjacent creeks. The San Pedro and Las Vegas Creeks converge near the General Western Aero Hangars and the San Pedro Creek runs adjacent to location of the hangars.

Impact BIO-3: A creek borders the north side development areas of the proposed Project. This creek contains ESHA (i.e., riparian scrub, wetlands, and open water) and is potential habitat for tidewater gobies and steelhead. Tidewater goby is a Federal endangered species and a CSC and is known to occur within the creek channel; steelhead of the southern California DPS is also a Federal endangered species and a CSC. It is not known to occur in Tecolotito or Carneros Creeks, but suitable spawning habitat is present upstream and regular monitoring of the creeks for steelhead has not occurred. Therefore, uncontrolled storm water runoff containing sedimentation or pollutants could have adverse effects on these protected fish within the creek waters.

Significant indirect impacts to San Pedro Creek as a result of construction activity related to proposed Project can be avoided through strict adherence to conditions of the project's General Construction Permit, issued by the Central Coast RWQCB, as well as any conditions related to applicable LCP policies through the Coastal Development Permit (CDP) process.

The Airport implements both the City of Santa Barbara's Storm Water Management Plan (SWMP) and an airport-specific storm water pollution prevention plan (SWPPP), approved by

the Central Coast RWQCB. All future north side development will be subject to the provisions of the SWMP, SWPPP, and permit conditions from RWQCB, as applicable. These measures will ensure that all planned development will meet the local and regulatory standards for storm water control.

Result BIO-3: There is no construction activity planned near San Pedro Creek as a result of the proposed Project. In addition, through implementation of the City's and RWQCB's existing drainage and water quality requirements, all future projects at the Airport must be designed to comply with the City's requirements for storm water runoff and the City's SWMP requirements. The Airport has an existing SWPPP, dated September 2009, which also maintains compliance with the City's SWMP. The Airport's SWPPP, as well as project-specific conditions of each project's General Construction Permit and CDP, would be enforced during all construction projects. Therefore, indirect impacts to protected species within San Pedro Creek are Class III, Less than Significant since proposed Project implementation would not result in a "substantial effect on a protected plant or animal species listed or otherwise identified or protected as endangered, threatened, or rare" within the creek environs. No proposed Project impacts to San Pedro Creek are anticipated therefore RWQCB and USACE permits are not anticipated.

Mitigation Measures for Biological Resources Impact BIO-3.

BIO/mm-3: No construction shall occur during the avian breeding season (February 1-September 1) unless a survey from qualified biologist with experience in conducting breeding bird surveys finds that no bird breeding habitat exists within 300 feet of the disturbance area (500 feet for raptors) or can state with certainty that such habitat does not contain nesting birds. Project personnel, including contractors working on the site, shall be instructed on the sensitivity of the area. Reductions in nest buffer distance may be approved by the City's Community Development Department depending on the avian species involved, ambient levels of human activity, screening vegetation, or other factors.

Conclusion: No substantial changes to the project, circumstances, or prior information have occurred that introduce a new significant environmental effect or substantial increase in the severity of a previously identified significant effect to Biological Resources.

Cultural Resources: The coastal area of Santa Barbara County, which includes the cities of Santa Barbara and Goleta, is located within the traditional territory of the Chumash Native Americans. Archaeological resources in the Santa Barbara/Goleta area include cave archaeology/rock art in the interior and middens (i.e., refuse piles) containing artifacts such as ornaments, tools, and shells along the coastal areas.

An influx of Spanish explorers and missionaries ushered in what is known as the Mission or Spanish Colonial/Mexican Period, ca. A.D. 1769-1830. El Pueblo Santa Barbara was established in 1769, followed by the construction of the Santa Barbara Presidio and Mission Santa Barbara several years later. Several local Chumash villages were mostly abandoned when the native people converted to Christianity and moved to Mission Santa Barbara. A local chapel, San Miguel Chapel, was built just outside the Chumash village of S'axplil to provide additional

access to Christian practices for the native population. The exact location of this chapel and community is unknown.

By the Rancho or Anglo-Mexican Period, ca. A.D. 1830-1870, California had become part of the Republic of Mexico and mission lands began to be confiscated by the Mexican government and then granted or sold for farming and ranching. Numerous ranchos, with a focus on cattle, were developed. In 1850, California became the thirty-first U.S. state. Eventually, a long period of drought forced a shift from ranching to farming and more commercial types of land uses. This marked the beginning of the American/Early Twentieth Century Period, A.D. 1870-1940. In the Goleta area, changes included the establishment of a whaling camp at the mouth of the Goleta Slough, construction of Hollister Avenue, the Southern Pacific Railroad and the La Patera Train Station, and the operation of a lemon packing plant and a slaughterhouse.

Impact CR-3: Cultural resources in the Goleta area, and especially in proximity to Goleta Slough, are numerous and include prehistoric and historic-era Native American sites as well as historic-era resources dating back to the late 1800s. Fifteen archaeological sites are recorded within or partially within Airport property; at least four of these sites have been determined to be eligible or appear to be eligible for listing on the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) and are considered to have moderate or high sensitivity to pre-historic resources and historic Native American values. Twelve archaeological sites have been recorded within 500 feet of the Airport; none are considered eligible for listing on the NRHP or CRHR at this time.

Overall, the improvements recommended by the proposed Project would not require the disturbance of archaeological sites that have been determined to be eligible or appear to be eligible for listing on the NRHP or CRHR. These sites have been mapped as “high” archaeological resource sensitivity zones identified in the Master Archaeological Resources Assessment for the Santa Barbara Municipal Airport (MARA) (City of Santa Barbara, 2009). There is one area of recommended future Terminal and apron expansion that is mapped as a “moderate” sensitivity zone; however, the two hangars are outside of this area. There is no evidence that the site contains any human remains. Standard Conditions of Approval Applicable to Project include procedures for the unanticipated discovery of human remains.

Result CR-3: Proposed Projects located within a moderate sensitivity zone of the MARA could have project-specific or cumulative impacts on cultural resources protected by Federal, State or City laws and guidelines. These impacts would be Class II, Impact Less than Significant Impact with Mitigation.

Mitigation Measure for Cultural Resources CR-3.

CR/mm-3: The City’s Standard Condition of Approval regarding “Unanticipated Archaeological Resources Contractor Notification” shall be implemented for the proposed Project.

Conclusion: The previous EIR evaluated areas of sensitivity, and the two hangars are outside of the “moderate” sensitivity zone. In addition, the City’s Standard Condition of Approval

regarding "Unanticipated Archaeological Resources Contractor Notification" shall be implemented as necessary for all projects. No additional mitigation is required.

Historic Resources: There are eight potentially historic buildings at the Airport, representing two different themes in the developmental history of the City, County, and Airport: early aviation (1928–1942) and World War II mobilization (1942–1946).

Option 4 sub-options a) and b) are both compromises that simultaneously satisfy the goals of the Airport and meets historic preservation compliance. Option 4 would involve the careful and strategic dismantling of Hangar 248 to reuse the building's historic materials in adaptive reuse to rehabilitate Hangar 249. Option 4 would follow the Secretary of the Interior's Rehabilitation Standards where possible; however, altering Hangar 249 for use as anything other than an airplane Hangar has the potential to negatively impact the property's historic integrity of association and feeling if character-defining features related to the building's historic use are not retained. Further, there would only be one hangar as opposed to two. Regardless of the future location or use, loss of Hangar 248 would be a Class I Significant Environmental Impact. Option 4 under both sub-options a) and b) would involve the total loss of Hangar 248, yet the Hangar 248 materials that would be salvageable would be reused in rehabilitating Hangar 249 wherever possible. The rehabilitation of Hangar 249 using salvaged materials resulting in its stabilization and continued use would serve as an overall positive counterbalance (mitigation) to the loss of Hangar 248. Loss of one Hangar 248, which is nearly identical in appearance and design to the Hangar 249 that would be retained and rehabilitated, is preferable to the total loss of both historic hangars.

Option 4 is a more sustainable Project, as this approach would reuse material that would typically be discarded as waste following demolition. Rather than using entirely new material, the rehabilitation of Hangar 249 would be completed using as much of the salvaged historic fabric of Hangar 248 as possible, preserving much of the historical value.

NRHP Criterion A through D. As the buildings retain historic integrity, the General Western Hangars appear to be eligible for listing in the National Register under Criterion A for their association with events that have made a significant contribution to the broad patterns of aviation history. The period of significance is 1931–1942, covering the time the hangars served as an airplane factory, flying school, host to United Airlines, and contributor to the incremental development of aviation at the Santa Barbara Airport.

It does not appear that the hangars are significant under National Register Criterion B, C, or D.

CRHR Criterion 1 through 4. Constructed in 1931, the hangars represent the first permanent buildings at the airport site. As discussed in detail in the EIR, Appendix E, the subject hangars are associated with events that have made a significant contribution to the broad patterns of California aviation history and appear to be significant under CRHR Criterion 1.

The hangars do not appear to be significant under CRHR Criterion 2, 3 or 4.

NRHP & CRHR Integrity Assessment. Although the setting of the hangars has been altered, a historical contemporary would recognize the buildings as they exist today. Due to the loss of the associated administration building and the shifting of airport activities, the buildings suffer a moderate loss of integrity of setting, but overall, the hangars retain good integrity of location, design, materials, workmanship, feeling, and association.

City of Santa Barbara Landmark Eligibility Evaluation. As the hangars appear to be eligible for listing on the NRHP and CRHR, the hangars are also eligible for listing as City Landmarks under the following City Criteria: 3a. Its character, interest or value as a significant part of the heritage of the City, the State, or the Nation; and 3e. Its exemplification as the best remaining architectural type. 4. Any structure, site or object meeting any or all the criteria provided for the National Register of Historic Places and the California Historical Landmark list. The hangars are currently listed as Potential Historic Resources for the City.

Impact CR-1. The Hangars 248 and 249 appear to be eligible for inclusion in the NRHP under Criterion A and CRHR under Criterion 1 for their association with events that have made a significant contribution to the broad patterns of aviation history. The hangars are also eligible for listing as City Landmarks for their architectural merits. As such Hangars 248 and 249 are historical resources for the purposes of CEQA. The hangars are located within the San Pedro Creek floodway. Various treatment options available to the City for the structures were previously evaluated in the EIR. A summary has been included as follows for clarity in the differences between the prior four Options analyzed in the previous EIR and the new Option 4's sub-options a) and b) as the impacts are similar and relevant. As such, under Option 1, leaving the hangars in the floodway without taking proper measures to protect them from flood events would result in Class I Significant Environmental Impact to historic resources under the NHPA due to "neglect of property that causes deterioration". Option 2, the City may choose to leave the structures in the floodway, but attempt to restore them and protect them from future flood events, the structures would remain unusable due to their hazardous location. Under Option 3, includes relocating both of the hangars out of the San Pedro Creek floodway, which would result in adverse impacts as well due to "removal of property from its historic location;" however, as discussed further below, a management plan would be implemented to mitigate the impact below a level of significance. Prior Option 4, demolishing the buildings after documenting their history was originally considered, but dismissed due to its resultant Class I Significant Environmental Impact to historic resources. Current Option 4, sub-option a and b would result in a Class I Significant Environmental Impact due to leaving the remaining Hangar 249 in the floodway (like previously analyzed Option 1) and sub-option b) would relocated the remaining Hangar 249 outside of the San Pedro Creek floodway, which would result in adverse impacts was well due to "removal of property from its historic location" (like previously analyzed Option 3) the demolition of one Hangar.

Result CR-1: Even with mitigation efforts to preserve Hangar 248, Option 4, sub-options a) and b) will result in a Class I Significant Impacts to historic resources.

Mitigation Measures for Historic Resource Impacts.

Per the "*Santa Barbara Airport General Western Hangars Project Constraints Analysis"*, if Option 4 is favored and deconstruction of Hangar 248 is approved for salvage of materials, thorough documentation of Hangar 248 would be required through the preparation of Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER) documentation, which would include large-format archival photography of exteriors and interiors, measured drawings, written descriptions of the building, and development of a historic context. The use of photogrammetry or light detection and ranging (LiDAR) technology may also be appropriate for documenting Hangar 248 and aid in the rehabilitation effort. These techniques, or a combination thereof, would create a permanent record of the physical features and historical significance of the demolished hangar. The information gathered through this documentation process would then be used to create informational materials to be displayed at the site of the demolished hangar and/or in the rehabilitated hangar. Informational materials could include a brochure, signage, or NPS-style pedestal panel that explains the historic significance of the Hangars and details the rehabilitation project to prevent a false sense of history. Additionally, the brochure and signage could document the relation of the Administration Building demolished in 1971, further documenting the site's original usage and appearance. Preparing an HPMP and appropriate HABS/HAER documentation of the deconstructed Hangar 248, reusing the historic materials salvaged, and creating explanatory materials such as a brochure or signage could serve as mitigation measures justified in a project specific EIR as required under CEQA.

Following HABS/HAER documentation and the development of an HPMP, trained professionals would need to partially disassemble or fully deconstruct Hangar 248 and catalog the sections or pieces of the Hangar that can be reused. A Secretary of the Interior (SOI)-qualified preservation architect and/or architectural historian would be required to monitor the entire deconstruction and construction process to ensure the historic materials are treated and used appropriately. All character-defining features of Hangar 249 must be documented and preserved, Hangars 249 and 248 are very similar, and preservation of one structure will preserve the character-defining features of both structures. The salvaged historic materials would need to be safely secured and stored in a climate-controlled environment until they are ready to be reused.

Conclusion: The proposed Project activity of carefully dismantling Hangar 248 and reusing its salvageable historic materials to rehabilitate Hangar 249, the Project would result in one hangar that fully represents the historic significance of the two hangars, jointly preserving this rare local building type and representing the hangars' period of historic significance.

Option 4 would involve the total loss of Hangar 248, but the materials would be salvaged for reuse in rehabilitating Hangar 249 wherever possible. The rehabilitation of Hangar 249 using salvaged materials resulting in its stabilization and continued use would serve as an overall positive counterbalance (mitigation) to the loss of Hangar 248.

A full restoration of both hangars, while desirable, would be extremely costly and likely require extensive reconstruction of Hangar 248. Salvaging and reusing as much historic material as possible from Hangar 248 to rehabilitate Hangar 249 provides a more cost-effective alternative to a full restoration of both structures. Per CEQA Section 15064.5 (b), the demolition of Hangar 248 is a Class I Significant Impact that cannot be mitigated to a lesser impact. In accordance with CEQA Section 15064.5(b)(3), the restoration of Hangar 249 consistent with the Secretary Of the Interior standards, it mitigated to a level of less than a significant impact on the historic resource.

Geology and Soils/Hazards and Hazardous Materials: Geology and Soils. The entire Goleta Valley is located within a seismically active region. The north branch of the More Ranch fault is located approximately 1,000 feet south of the Airport, while other active faults, such as the offshore North Channel Slope fault (located in the Santa Barbara Channel) and the onshore Santa Ynez fault (located along the Santa Ynez Mountains), are located farther away. In addition, local fault systems include east-west trending faults across the south end of the Airport (City of Santa Barbara 2010). The Airport is mapped by the City as having high liquefaction potential because it Is underlain by estuarine deposits and has a high-water table.

There are also potentially compressible soils at the Airport associated with the Goleta Slough (City of Santa Barbara, 2002) and, although not typically occurring together, the Airport is mapped as having potential for soil expansion (clay soils with plasticity) (City of Santa Barbara, 2010). The Airport is relatively flat and does not have potential for significant landslides or substantial erosion; there are no sea cliffs located on the Airport.

Hazards. The Airport, which is situated on a coastal plain, is not located in an area susceptible to wildland fires. It is located in a City-designated tsunami hazard zone.

Hazardous Materials. Individual businesses located at the Airport are required to register all hazardous materials with the EPA as well as State and local regulatory agencies. Airport businesses also report to EPA regarding emissions related to hazardous materials.

Impact G/HAZ-1: The Airport is located within a seismically active area with local faults known to be present on-site; this is true of the entire region. In addition to fault rupture and ground shaking, the Airport has a high potential for liquefaction to occur on-site. Thus, future proposed Project development could be adversely affected by seismic activity.

Result G/HAZ-1: Implementation of the proposed Project would not create unusual risks for people or structures related to seismic hazards and liquefaction. Industry-standard engineering practices are known and available to prevent most significant adverse impacts. These standards are implemented through City review and approval of project-related grading plans and building permits. As such, potential risks due to fault rupture, ground shaking, and liquefaction would be Class II, Less than Significant Impact with Mitigation.

Impact G/HAZ-2: There are potentially compressible soils associated with Goleta Slough at the Airport; there is also potential for expansive soils at the Airport. Thus, future development could be adversely affected by adverse soil conditions. Substantial soil erosion or loss of topsoil, however, is not anticipated as a result of the proposed Project. The Airport is relatively flat and has an existing storm water pollution prevention plan (SWPPP) (dated September 2, 2009) and City Storm Water Management Program (SWMP) in place.

Result G/HAZ-2: Implementation of the proposed Project would not create unusual risks for people or structures related to soil conditions. Industry-standard engineering practices are known and available to compensate for soil compression and/or soil expansion through project design and construction. These standards are also implemented through City review and approval of project-related grading plans and building permits. As such, potential risks related to adverse soil conditions would be Class II, Less than Significant Impact with Mitigation.

BMPs and sedimentation control measures would be required for the proposed Project per the City's adopted SWMP and the Airport's RWQCB-approved SWPPP; potential impacts due to erosion would be Class III, Less than Significant Impact.

Impact G/HAZ-3: Future activity at the hangars could also involve the use, transport or disposal of hazardous materials. The use, transport or disposal of hazardous materials is heavily regulated. For example, the Airport already implements SPCC plans and operations manuals at both of its existing fuel farms, no fuel farming has been proposed as part of the proposed Project. Individual businesses are required to register all hazardous materials with the EPA as well as State and local regulatory agencies. Potential impacts to public safety due to reasonably foreseeable upset and accident conditions at the Airport are the responsibility primarily of FAA. Part of its statutory mission is to ensure the safe usage of navigable airspace and to provide for the safety of aircraft and airport operations. The Airport implements all safety areas and transitional zones required by the FAA, including the protection of its runway protection zones (RPZs). The proposed Project would not have an adverse effect on emergency evacuation and response measures in the area. No road closures in the surrounding area would be necessary as a result of the development of the proposed Project. The project site is located in an urban area where all public services are available. The Airport itself contains an aircraft rescue and firefighting (ARFF) facility, which is staffed by the City of Santa Barbara Fire Department. In the event of an on-airport emergency, both the City and Santa Barbara County Fire Departments would respond, as necessary.

Result G/HAZ-3: Potential risks of the routine handling or transport of hazardous materials or potential risks to public safety due to reasonably foreseeable upset and accident conditions related to the proposed Project would be Class III, Less than Significant Impact. The use and transport of hazardous materials at the Airport is heavily regulated. in addition, FAA requires safety practices and zones on all airports, particularly those that provide scheduled commercial passenger service, i.e., Part 139-certified airports. Due to the emergency services already in place at the Airport, potential impacts to emergency evacuation and response plans as a result of the proposed Project would also be Class III, Less than Significant Impact.

Impact G/HAZ-4: Although extensive remediation has occurred at the Airport and there is currently no known soil or groundwater contamination, there remains the potential for exposure of project occupants or construction workers to un-remediated soil or groundwater contamination as proposed Project construction activity are undertaken.

Result G/HAZ-4: Since the proposed Project may have contaminants, the potential for hazardous materials exposure remains, even though there is no known soil or groundwater contamination. The potential for impact would be Class II, Less than Significant Impact with Mitigation

Mitigation Measures for Hazards/Hazardous Materials.

The City's Standard Condition of Approval related to asbestos and lead exposure would apply to the demolition of any hangars at the Airport. These measures would reduce potential geological risks, soil conditions, and hazardous materials impacts to a less than significant level and ensure project consistency with City Geneal Plan policy PS9.

G/HAZ/mm-1: The design and construction of load-bearing structures shall be subject to the recommendations of a site-specific and project-specific geotechnical investigation and/or engineering report. This mitigation is not necessary for minor development projects unless required by the building permit.

G/HAZ/mm-2: A Construction Contingency Plan shall be developed that addresses methods to control potential migration of any contamination discovered during construction as well as safety practices for on-site construction personnel and the general public. Details of the plan shall include, but not be limited to: Soils monitoring for identification of contaminated soil during and after construction for all eroded and/or graded soils; Measures to be taken to protect workers and the public (such as fencing or hazard flagging, covering contaminated soil with plastic, etc.) and to prevent migration of contaminants to the surrounding environment; Notification procedures including, but not limited to, Santa Barbara County Environmental Health Services. The Construction Contingency Plans may be incorporated into the Construction Phase Erosion Control and Polluted Runoff Control Plans required per LCP Policy C- 14 for projects requiring a CDP.

G/HAZ/mm-3: If contamination is discovered, a project-specific remediation plan shall be prepared and implemented per applicable regulations that reduces all contaminant concentrations to acceptable levels prior to the issuance of grading or building permits or, if already under construction, prior to resuming work.

Conclusion: With incorporation of the previous EIR mitigation measures noted above prior to and during project construction, no new significant environmental effect or substantial increase in the severity of a previously identified significant effect to hazardous materials or risk of upset would occur. These measures would reduce potential geological risks, soil conditions, and hazardous materials impacts to a Less than Significant Level.

Hydrology, Water Quality, and Flooding: Water Resources and Quality. The Airport is located within the South Coast watershed, which drains the steeply sloping land of the Santa Ynez Mountains southwards towards the Pacific Ocean. An approximate 416-square mile area, the watershed is comprised of smaller watersheds associated with seven sub-drainages. Of these seven sub-drainages, three discharge directly into Goleta Slough on the Airport property: Tecolotito Creek, Carneros Creek, and San Pedro Creek/Las Vegas Creek. In addition, runoff from the adjacent bluffs of UCSB and More Mesa influences Goleta Slough. The watershed of the Goleta Slough itself is approximately 48 square miles (GSMC 2014).

The Airport's existing storm drainage system is comprised of surface swales, drainage inlets, concrete pipe, and outfall structures. The proposed Project is located within a floodway, which is controlled by the tide and the creeks' water levels at the storm drainage outlets. The existing system drains ponded water after the creeks' water levels have receded. The Airport's storm water system drains primarily the Airport-owned watershed; most of the storm water inlets are located within the restricted access areas. Sources of storm water discharges to these inlets are generally limited to airfield tenants and Airport Department activities (City of Santa Barbara 2009). The creeks that flow through the Airport and into Goleta Slough, however, receive discharges from off the Airport, including nearby upstream residential, industrial, transportation, and agricultural land uses.

The EPA's CWA section 303(d) List of Impaired Waters (reporting year 2008) includes Goleta Slough and several of its tributary creeks. In addition, the Goleta Slough/Estuary is on the State's 2010 CWA section 303(d) list of impaired waters for pathogens and toxic organics. Urban run-off and other nonpoint sources contribute to the impairment.

Flooding and Inundation Hazards. The Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps (FIRMs) for the Goleta area show that the Airport is located within the 100-year floodplain (i.e., Special Flood Hazard Areas Subject to Inundation by the 1 Percent Annual Chance Flood). The Airport is located within Zone AE, which indicates that base flood elevations have been determined.

In addition, several Floodway Areas have been mapped over portions of the Airport as they correspond to San Jose, San Pedro, Carneros, and Tecolotito Creeks. Floodway Areas are the channel of the stream, plus any adjacent area that must be kept free of encroachment so that the 1 percent annual chance flood can be carried without substantial increase in flood heights. The proposed Project is located within a floodway.

The Santa Barbara County Flood Control District (SBFCD) conducts flood control maintenance activities at the Airport. Erosion, both natural and man-made, has caused sedimentation of the stream channels that drain into Goleta Slough. This siltation, as well as growth of vegetation, has led to the exacerbation of flooding during times of heavy runoff. Therefore, the SBFCD routinely dredges the streams to prevent and reduce the severity of local flooding. Both dragline desilting and hydraulic dredging methods have been utilized. An average of 105,000 cubic yards (cy) are removed per season (SBFCD 2010). There have been two major flood events at Goleta Slough

since the construction of the Airport in the late 1930s. The highest water levels in the Slough in modern times occurred in connection with a flood occurrence in 1969 and covered most of the airport runway, access roads, and parking lots. A second major flood event occurred in 1995, caused ponding on low-lying portions of the runways, and deposited a considerable amount of sediment on the runways and taxiways (GSMC 2014). The Airport is not located in any known inundation hazard zones for substantial mud flows or seiche; it is, however, located in the tsunami hazard zone for the City. The City has evacuation plans for those parts of the City that could be affected should a threat such as a tsunami be anticipated.

Project Specific Impacts related to Drainage and Water Quality and Flooding and Inundation Hazards.

Impact HYD-1: Future construction activity and impervious surfaces created by the proposed Project could result in drainage, storm water, and surface water quality impacts in Goleta Slough and other Section 303(d) impaired waters. For the most part, development would occur in areas of the Airport already covered by impervious surfaces, i.e., pavement and buildings. There are four creeks that traverse the Airport property from north to south the San Pedro creek is closest to the proposed Project. The recommended development does not involve the disturbance or alteration of any of the on-site creeks.

Result HYD-1: The City and State require that on-site capture, retention, and treatment of storm water be incorporated into the proposed Project. Pursuant to the City's SWMP and the NPDES General Permit for Storm Water Discharges, projects must be designed to capture and treat the calculated amount of runoff from the project site for a one-inch, 25-year storm event, over a 24-hour period. Therefore, at the planning level, potential drainage and water quality impacts would be Class III, Less than Significant Impact.

Through implementation of the City's and RWQCB's existing drainage and water quality requirements, all future projects at the Airport must be designed to comply with the City's requirements for storm water runoff and the City's SWMP requirements. The Airport has an existing SWPPP, dated September 2009, which also maintains compliance with the City's SWMP. The Airport's SWPPP would be enforced during the proposed Project.

Impact HYD-2: The proposed Project sub-option a and b differ in removal of existing structures from floodway areas. The risk to people and structures at the Airport due to flooding would be lessened by the recommended relocation of two historic Hangars out of the floodway as identified under sub-option b. Executing Option 4 would not inherently address ongoing concerns related to flooding. Flood adaptation measures would need to be taken to stabilize and protect the hangars both in the short and long term. Regardless of which project option is selected, all flood adaptation measures should be undertaken following the SOI's *Guidelines on Flood Adaptation for Rehabilitating Historic Buildings*, developed specifically to provide technical preservation guidance for historic properties at risk of flooding. The Guidelines are applied in conjunction with the SOI Standards. The Guidelines do not replace applicable federal, state, and local code requirements and regulations, which must be considered when planning

flood adaptation projects. Per the Guidelines, moving a historic building for flood management purposes requires that: (1) the building be structurally stable to either move safely, or be feasibly partially disassembled or fully dismantled and reassembled on the new site; and (2) that the receiving site must be located outside the established flood risk area while remaining similar in character to the building's original setting. Demolition is never a recommended treatment as it is not consistent with the SOI Standards or Guidelines and should only be considered if no other options are possible.

In addition, the Airport will experience increased flooding attributable to changing climate and sea-level-rise over the useful life of proposed Project (City of Santa Barbara, 2009). This is also the conclusion of a statewide study Slough Management Plan. As previously discussed, the Slough Management Plan recommends that current planning efforts identify adaptation strategies to accommodate at least five feet of sea level rise since infrastructure constructed now may still be in use within the time that a sea-level-rise of five feet could occur.

Result HYD-2a: The extent to which the proposed Project will remain within floodway or Zone AE (100- year floodplain) areas would impede or redirect flood flows cannot be fully determined until the design of the future structures is known and has been evaluated. However, all development projects at the Airport would be required to comply with Chapter 22.24, Flood Plain Management of the City Municipal Code. The chapter includes the establishment of a development permit for construction or development within any Special Flood Hazard Areas, the conditions that need to be met for a variance, general standards for flood hazard reduction, and specific regulations related to floodways. Therefore, flooding impacts of future development under the proposed Master Plan would be Class III, Less than Significant Impact.

Result HYD-2b: The removal as proposed under Option 4, sub-option b recommending removal of existing structures and land uses from the floodway would reduce existing flooding risks at the Airport. Thus, these aspects of the proposed Project would be Class IV, Beneficial Impact.

Result HYD-2c: Based on recent CEQA case law, (i.e., *California Building Industry Association [CBIA] vs. Bay Area Air Quality Management District [BAAQMD]* [2015]), CEQA analysis "is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents" (CBIA, 62 Cal. 4th at 97). Therefore, no impacts related to sea-level-rise are attributable to the proposed Project. However, discussion of sea-level-rise has been retained for informational purposes and mitigation measures to aid in protecting Airport infrastructure from future flooding due to sea-level-rise is recommended.

Impact HYD-3: Although the Airport is not located in any known inundation hazard zones for substantial mud flows or seiche, it is located in the tsunami hazard zone for the City. However, the proposed Project would not result in new growth at the Airport; rather, it contains plans for minor redevelopment. Result HYD-3: The City has evacuation plans for all parts of the City that would be affected should a threat such as a tsunami be anticipated. Based on these existing emergency procedures, inundation by tsunami is not considered to be a "substantial unmitigated

risk," and impacts related to this significance threshold would be Class III, Less than Significant Impact.

Mitigation Measures for Drainage and Water Quality and Flooding and Inundation Hazards.

The City's Flood Plain Management chapter of its Municipal Code (Chapter 22.24) would apply to any proposed construction within Special Flood Hazard Areas, which include the mapped floodways and the 100-year floodplain (Zone AE) at the Airport. This would affect all recommended development projects, and the two hangars located within a mapped floodway. Other than compliance with the City's Municipal Code and any conditions of a City-issued variance or development permit, as well as implementation of the City's SWMP and the Airport's NPDES permit and SWPPP, therefore no mitigation for drainage, water quality and flooding is required.

Recommended Mitigation Measures for Hydrology and Water Quality Result HYD-2c.

Future flooding at the Airport due to climate change and sea-level-rise is anticipated to be approximately five feet over the next 85 years.

HYD/mm-1: The potential impact of local sea-level-rise associated with Climate Change should be considered in the planning and design of the proposed Project. A project-specific CDP may be subject to tidal inundation and flooding should include an analysis of improvement location and design in relation to projected future changes in sea-level-rise, utilizing the best available science, to ensure new development is located and designed to eliminate or minimize, to the maximum extent feasible, hazards associated with anticipated sea-level-rise over the expected design life of the project (75 years).

HYD/mm-2: The Airport should raise all new or reconstructed buildings to one foot above base flood elevations as well as apply thicker pavement lifts during regular intervals over the lifetime of the Airport to reduce the potential for flooding on the tarmac.

HYD/mm-2a: Per the *Santa Barbara Airport General Western Hangars Project Constraints Analysis,* the City is currently considering constructing a concrete stem wall as a flood adaptation measure. The required height of the stem wall is based on the Design Flood Elevation (DFE), which is calculated by the City's Building and Safety Division. The hangars are currently considered Design Class 1 structures, but the actual DFE and design classification will be dependent on the final use of the hangars. The DFE and design classifications for potential reuse options are as follows:

1. Restore in place, use as a hangar for essential aircraft or vehicles: Design Class 4, 21.2-foot DFE

2. Restore in place, use as a museum: Design Class 3, 21.2-foot DFE

3. Restore in place, use as an office or as a hangar for non-essential aircraft or vehicles: Design Class 2, 20.2-foot DFE

4. Relocation, any use: Design Class and DFE cannot be determined as a new BFE calculation for the proposed location will be required.

Conclusion: As noted above, other than compliance with the City's Municipal Code and any conditions of a City-issued CDP, as well as implementation of the City's SWMP and the Airport's NPDES permit and SWPPP, no mitigation for drainage, water quality and flooding is necessary. No significant flooding impacts would result from this project.

Land Use and Planning: The Airport is owned and operated by the City of Santa Barbara; however, the Airport is surrounded by land within the City of Goleta, the County, and UCSB. The land surrounding the Airport contains: Pacific Ocean coastline and beaches (south); and the associated student community of Isla Vista (southwest); industrial and commercial land uses (north and east); golf courses and undeveloped open space (north and west); and residential land uses (interspersed within the nearby commercial, recreational, and educational land uses). Specific land uses in proximity to the Airport include the North Campus Open Space 0.7 mile to the west, the Twin Lakes Golf Course directly across Hollister Avenue to the north, the Goleta Sewer District Treatment Facility adjacent on the southeast, and the Goleta Beach and Pier further to the Twin Lakes Golf Course southeast. City General Plan land use designations for the Airport are "Airport" and "Goleta Slough Natural Reserve." These designations generally mirror the Airport's zoning districts, i.e., the "Goleta Slough Natural Reserve" land use designation covers areas of the Airport zoned as G-S-R while the remainder of the Airport is designated as "Airport."

Since land use compatibility can be related to noise and other nuisance impacts, a "windshield" survey was conducted to determine if sensitive receptors such as residences, schools, places of worship, and long-term health care facilities, are located within proximity to the Airport. There are no sensitive receptors within the Airport's existing (2011) Community Noise Equivalent Level (CNEL) noise contour,14 which extends off the Airport property east over a mixed industrial/warehouse area off Bush Lane and Thornwood Drive and west between South Los Carneros Road and Storke Road between the Airport boundary and Home Depot.

The closest residences to the Airport are small single-family homes interspersed within the mixed industrial/warehouse area east along South Fairview Avenue and a multifamily residential complex (Willow Springs Apartments) along Willow Springs Lane. There are no residences located within the 65 CNEL for the Airport; there are, however, several single-family residential neighborhoods and one trailer park located within, or partially within, the 60 CNEL. Although located adjacent to Airport property to the south, UCSB is located outside the 60 CNEL and is buffered from Airport operations by Goleta Slough.

Federal (Federal Airspace and Airports), State (Caltrans Aeronautics) and Local/Regional agencies have jurisdiction over the Airport. The City is responsible for processing CDP in concert with the policies of the certified Local Coastal Plan (LCP) for development within the Coastal Zone. The City is also responsible for issuing grading permits, building permits, and

floodplain development permits for development at the Airport. The City's Historic Landmarks Commission process may also apply. Authority to Construct permits from the Santa Barbara County Air Pollution Control District (APCD) would be required for certain projects.

There are two primary planning documents that address development at the Airport, both of which are under the jurisdiction of the City of Santa Barbara, the SP-6 Plan (1998) and the Airport's Aviation Facilities Plan (2003). Together, these two documents comprise the Airport's existing Master Plan. The Airport also has its own LCP, prepared by the City of Santa Barbara and certified by the California Coastal Commission. The LCP discusses the resources found within the Airport component within the City's Coastal Zone and presents LCP policies designed to provide additional protection to coastal resources not adequately protected under the City General Plan policies. The LCP is also intended to regulate Coastal Zone development in conformance with the Coastal Act. City General Plan policies are also applicable to the Airport and include those found in both the various elements of the City of Santa Barbara General Plan the Santa Barbara General Plan amendments (2011). In addition to those plans and policies relating to environmental effects, Santa Barbara General Plan includes measures applicable to the Airport and its industrial areas, such as policies related to the Airport's role in promoting jobs and economic health in the City. When analyzing the environmental effects of Santa Barbara General Plan, the certified Final EIR assumed "continued moderate growth of the City's Airport and adjacent specific plan area" (City of Santa Barbara, 2010).

Project Specific Impacts.

Impact LU-1: The proposed Project does not involve any improvements that have the potential to physically divide the surrounding communities, nor would it close any existing bridges or roadways. All improvements occurring under the proposed Project would occur on Airport property.

The proposed Project recommends deconstruction of one hangar and reconstruction of one of the two hangars. Under sub-option a) Hangar 248 would be deconstructed to use in replacement of materials in poor condition in Hangar 249 in the existing location, under sub-option b) both hangars located in the northeast corner of the Airport would be deconstructed and only Hangar 249 would be rebuilt outside of the floodway. The location for reconstruction of Hangar 249, has yet to be determined yet most locations within the Airport are a greater distance to sensitive noise receptors than the current hangar location. Currently, the closest sensitive noise-receptors (i.e., residents of University Mobile Home Park) are located on Pine Avenue approximately 1650 feet from the two hangars.

Result LU-1: No significant impacts would occur to adjacent communities as a result of the proposed Project. Since all construction or demolition activity is required to comply with the City's noise ordinance, construction noise at the distances discussed above would have Class III, Less than Significant Impact on noise-sensitive receptors.

An analysis of consistency with the City's General Plan policies and other plans adopted for the purpose of avoiding or mitigating an environmental effect has been included within the various environmental resource areas in the prior EIR. Based on this analysis, the proposed Project is consistent with all applicable sections of the City's General Plan, Climate Plan, and SWMP.

Analysis of City LCP policies as they relate to the Goleta Slough are discussed in the next section.

Result LU-2: The proposed Project would not preclude the implementation of applicable City General Plan, Climate Plan, or SWMP policies into individual development projects or airfield safety improvements, where appropriate, as long as the safety of the Airport is maintained. Required mitigation measures related to the City's Standard Conditions of Approval would also ensure that the proposed Project is consistent with the City's applicable plans and policies. Impacts to applicable land use and other City plans as a result of the proposed Project would be Class III, Less than Significant Impact.

Impact LU-3: The City of Santa Barbara Planning staff has analyzed the proposed Project's consistency with the City's SP-6 Plan (*Santa Barbara Airport Industrial Area Specific Plan*) which states "these buildings will be preserved during the buildout" of the Specific Plan and identifies both buildings as Local Landmark Eligible in Table 2.

Result LU-3: Since the proposed Project is inconsistent with the City's SP-6 Plan, with only preservation of Hangar 249 and not both hangars as described in the plan, impacts related to SP-6 Plan consistency would be considered a Class I Significant Environmental Impact with Mitigation.

Impact LU-4: An analysis of consistency with the City's LCP policies adopted for the purpose of avoiding or mitigating impacts to coastal resources has been included within the various environmental resource categories of this EIR addendum and a summary policy consistency analysis with the City's LCP policies is provided below. Based on this analysis, with mitigation, the proposed Project is consistent with all applicable LCP policies addressing potential impacts to water quality/marine resources, wetlands, environmentally sensitive habitats, public access and recreation, visual resources, cultural resources, public services, and hazards related to geology, fire, flooding and sea level rise (including potential tsunami hazards).

Water Quality and Marine Environments

New development on the airport property in proximity to Goleta Slough and the various waterways/drainages that traverse the property has the potential to impact coastal water quality through grading, removal of native vegetation, increase of impervious surfaces and associated runoff, erosion, and sedimentation. In addition, due to the history of aviation use of the airport property and the types of material associated with aircraft operation and maintenance, there is a potential for encountering contaminated sites and/or release of hazardous materials during construction and operation.

The proposed Project would not be located within the waterways/drainages that traverse the airport property and therefore would not result in channelization or substantial alteration of onsite waterways. New or improved drainage systems necessary to convey runoff from improvement areas, including any drainage discharge or disposal devices, would be designed to avoid or minimize impacts to the site's waterways/drainages.

Compliance with the LCP's water quality policies, Policies C-12, C-13 and C-14, and identified mitigation measures which include implementation of construction and post-construction best

management practices (BMPs), would ensure that new development for the proposed Project would be implemented in a manner to protect water quality. The Airport has an active SWPPP and a City-approved SWMP, both of which include measures to manage potential hazardous materials and to protect water quality at the Airport. In addition, all development would have to comply with the Airport's NPDES Industrial Permit and SPCC plans and operations manuals. Therefore, the proposed Project is consistent with LCP Policies C-12, C-13 and C-14.

Wetlands

Section 30233 of the Coastal Act and LCP Policies C-4 and C-10 set forth specific limitations on uses allowable in wetlands. The limitations are generally defined in a 3-part test as follows:

1. The purpose of the project is limited to one of eight allowable uses identified in Section 30233;

2. The project has no feasible less environmentally damaging alternative; and

3. Adequate mitigation measures to minimize the adverse impacts of the proposed project on habitat values have been provided.

Proposed projects would be located within the existing developed areas. Based on a preliminary wetlands inventory and vegetation mapping conducted on the Airport (Dudek 2012), the two existing hangars are located west San Pedro Creek that supports wetlands as defined by CCC and/or USACE/RWQCB due to the presence of hydrophytic vegetation.

Additional surveys prior to actual development would be necessary to delineate the exact limits of jurisdiction. Any portion of the project involving improvements that result in temporary or permanent fill in wetlands trigger the 3-part test for projects involving wetland fill as required by Coastal Act Section 30233 and LCP Policies C-4 and C-10.

1. Allowable Use

Option 4 is similar in nature to Options 1-3 which were evaluated previously under the original EIR. The Project will not be located near a wetland and will not have the potential to impact wetlands.

2. The Project has no Feasible, Less Environmentally Damaging Alternative

The location of the Project avoids sensitive vegetation communities and provides adequate setbacks from adjacent resources associated with San Pedro Creek. There are no alternative designs or configurations available that would allow for project implementation and avoid or reduce temporary or permanent impacts to wetlands.

Environmentally Sensitive Habitat Areas

The proposed Project is located in areas that are currently developed and therefore have no potential to impact Environmentally Sensitive Habitat Areas (ESHAs). The location and design of the proposed Project avoids sensitive vegetation communities and provides maximum setbacks from adjacent resources associated with the San Pedro Creek and Goleta Slough. No improvements would occur in habitat areas known to support special-status species.

Compliance with the LCP's ESHA protection policies and identified mitigation measures would ensure that the proposed Project would be implemented in a manner to protect ESHA and sensitive status species.

Public Access/Recreation

The proposed Project does not raise issues of consistency relative to the public access and recreation policies of the Coastal Act or LCP as the Hangar 248 and Hangar 249 are both located within a secure area of the Airport not accessible to the general public currently no change in access is proposed at the current location under sub-option a) Hangar 249's structure would remain inaccessible to the public and used as Airport related storage. The proposed Project would not result in intensification of the use of the existing facilities. No significant project-specific or cumulative traffic impacts would occur as a result of the proposed Project and proposed development would not interfere with the public's right of access to the sea. In addition, the proposed Project would have no adverse effect on public access and recreational opportunities on airport property beyond those limitations presently established at the Airport to ensure safe and secure airport operations.

Visual Resources

The proposed Project does not raise issues of consistency relative to Coastal Act or LCP policies which require scenic and visual qualities of coastal areas be considered and protected, that new development protect views to and along the ocean and scenic coastal areas, and that development be consistent with the character and quality of Santa Barbara. Development of the proposed Project would involve removal of Hangar 248 while providing rehabilitation to Hangar 249 located in developed areas of the Airport adjacent to existing structures under sub-option a) and under sub-option b) the proposed relocation of Hangar 249 remains to be determined at this time. The proposed location of Hangar 249 under sub-option b) would be within the developed Airport. No grading is proposed that would alter natural landforms. New lighting would remain on the airfield and other developed portions of the Airport. From off-site areas, such as adjacent streets, the property would continue to look like a developed airport with limited noticeable change in its appearance. Therefore, the proposed Project may be found consistent with Coastal Act Section 30251 and LCP Policy E-1.

Cultural Resources

The proposed Project may potentially result in impacts to archaeological or other culturally sensitive resources. Development located in the northeast corner of the Airport, south of Hollister Avenue, would occur partially in areas designated in the City's Master Archaeological Resource Assessment (MARA) study as Low sensitivity for Native American Resources.

Work would generally be limited to excavation and grading to remove existing pavement and construction of new pavement and foundations in previously developed areas. However, trenching for utilities may require deeper subsurface disturbance and could potentially affect unknown cultural resources at the site. LCP Policy F-3 requires mitigation and monitoring of activities that could affect sensitive cultural or archaeological resources including the requirement for onsite monitoring by a qualified archaeologist or resource specialist and an appropriate Native American consultant of all ground disturbing activities. Compliance with

Policy F-3, the City's MARA, and standard City conditions of approval would ensure protection of cultural resources.

Public Services

The proposed Project is consistent with Section 30254 of the Coastal Act and LCP Policy G-1 as adequate public services such as water, wastewater, traffic circulation, and parking would be available to meet the needs generated by the proposed Project. Future landfill capacity is currently constrained in the region and the Airport would be required to comply with citywide measures to reduce its waste stream. However, in terms of its consistency with this section of the Coastal Act, the Airport is a basic service that is vital to the economic health of both the region and the nation.

Hazards

The proposed Project's two hangars are located within the floodway of the San Pedro Creek. Base flood elevations have been determined for development of new buildings which would ensure potential flood hazards would be reduced. Under sub-option a) Hangar 249 would remain in a floodway and therefore potentially impacted by flood events, while under sub-option b) Hangar 249 would be relocated on the Airport out of a floodway and would remain in a 100-year flood, as the entire Airport is mapped in the 100-year floodplain.

The proposed Project, and the region, is subject to seismic activity. Potential hazards related to seismic activity include fault displacement and ground shaking (primarily from nearby historically active More Ranch fault), liquefaction, and tsunamis. Compliance with the City's Seismic/Safety and Conservation Elements and mitigation measures would ensure new developments would be designed and constructed to minimize these risks.

An increase in emissions, including GHG emissions, would occur over the 20- year planning horizon of the Master Plan. However, the Airport has in place a GHG Inventory and Carbon Footprint Reduction Plan (City of Santa Barbara 2007). Sea-level-rise is a concern for much of coastal Santa Barbara and studies are underway to evaluate potential sea-level-rise scenarios at the Airport which will help to assess potential risks to airport facilities.

Result LU-4: The proposed Project would not conflict with any applicable LCP policy adopted for the purpose of avoiding or mitigating an impact to coastal resources. No impacts are anticipated as the proposed Project is already part of the baseline condition and not in the vicinity of the Goleta Slough. Potential impacts of adoption of the proposed Project would be Class III, Less than Significant Impact.

Mitigation Measures.

Standard City mitigation measures may be required for specific construction or demolition projects recommended by the proposed Project. This EIR addendum and regional plans adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation Measures for Land Use Impacts LU-4 and LU-6.

The following programmatic measures have been incorporated into the Mitigation Monitoring and Reporting Plan for the Master Plan. Implementation of these measures would serve to avoid

or mitigate future potential impacts of the proposed Master Plan to coastal resources and ensure consistency with applicable LCP policies and the G-S-R zone/General Plan land use designation for the GSER. Therefore, potential impacts of recommended projects within the proposed Master Plan would be Class II, Less than Significant Impact with Mitigation.

LU/mm-1: A detailed project-specific impact analysis and mitigation program for the Taxiway H Airfield Safety Project, and associated analysis of the project's consistency with the G-S-R zone and the policies of the Airport's LCP and California Coastal Act, shall be conducted during the CDP and LCP amendment review process. The analysis shall specifically address project alternatives, mitigation, and/or additional LCP policy requirements necessary to ensure that any permitted impacts to wetland and sensitive habitat and associated buffers will be adequately minimized and mitigated to ensure long-term protection of Goleta Slough habitats and open space.

Conclusion: Option 4 will comply with all applicable land use regulations, and follow the process for any Federal, State, and Local agencies. The programmatic measures have been incorporated into the Mitigation Monitoring and Reporting Plan for the proposed Project. Implementation of these measures would serve to avoid or mitigate future potential impacts of the proposed Project to coastal resources and ensure consistency with applicable LCP policies and the G-S-R zone/General Plan land use designation for the GSER. Therefore, potential impacts of recommended projects within the proposed Master Plan would be Class II, Less than Significant Impact with Mitigation.

CEQA FINDING

Based on the above analysis, and in accordance with CEQA Guidelines Section 15164 the current project changes do involve new significant severity of impacts not previously identified in the certified EIR with regard to Historic Resources and Land Use and Planning. Additionally, there have been changes under which the project is undertaken and there is new information of substantial importance that shows the project would have significant effects not discussed in the previous EIR or that significant effects previously examined would be more severe than identified in the previous EIR. New mitigation measures are required to address impacts associated with Historic Resources and Land Use and Planning. In accordance with State CEQA Guidelines Sections 15162 and 15163, no Subsequent or Supplements to the Environmental Impact Report is required for current project actions.

This Addendum identifies the current project changes and changes to project impacts and mitigation measures. Implementation of previous and current mitigation measures in conjunction with the prescribed MEA environmental measures are required for the Project. Two Class I Significant Environmental Impacts have been identified and cannot be mitigated to a lesser impact; therefore, a Statement of Overriding Considerations is required for each Class I Significant Impact. This addendum together with the certified Environmental Impact Report for the Final Program Environmental Impact Report On The Proposed Airport Master Plan constitute adequate environmental documentation in compliance with CEQA for the current project.

Prepared by: _____ **Date:** 11/28/2023

Kaitlin Mamulski, Project Planner

Reviewed by: _____ **Date:** 11/29/2023

Beth Anna Cornett, Senior Planner I

Attachments (*as applicable):*

Attachment 1 – Vicinity Map

Attachment 2 – Conditions and Further Use Analysis Study for the General Western Aero Hangars, Buildings 248 & 249 (LMA Architects, August 24, 2023)