



**ADDENDUM TO PROGRAM ENVIRONMENTAL IMPACT REPORT
for the Plan Santa Barbara General Plan Update (SCH 2009011031)
FOR: CITY OF SANTA BARBARA PROPOSED HISTORIC RESOURCES
ELEMENT**

July 3, 2012

This addendum to the certified Final Environmental Impact Report (FEIR) for the *Plan Santa Barbara* General Plan Update documents California Environmental Quality Act (CEQA) analysis for the proposed Historic Resources Element. The proposed Element would amend the City of Santa Barbara General Plan and replace the existing General Plan Historic Resources Framework and Cultural Resources Section of the Conservation Element. Associated changes to project impacts fall within the range of policy options, growth scenarios, and impacts studied in the FEIR, and do not raise new environmental issues.

EIR ADDENDUM PROCEDURES

This EIR Addendum is prepared in accordance with State CEQA Guidelines Sections 15168 (Program EIR) and 15164 (Addendum to an EIR).

Section 15168 provides that a Program EIR may be prepared on a series of actions characterized as one large project, such as a citywide General Plan update. This allows for a comprehensive consideration of policies and effects, and avoids later duplicative environmental analysis. When subsequent implementing actions are undertaken, the activities may be approved as within the scope of the Plan covered by the Program EIR when no new significant effects would occur.

Section 15164 provides that an Addendum to a previous EIR may be prepared to document changes that make the prior EIR adequate for the current project when the changes are not associated with new significant impacts or substantial increases in previously identified impacts.

The Guidelines provide that an EIR Addendum need not be circulated for public review, but is attached to the EIR. The decision-making body (City Council) considers the Addendum together with the certified EIR in making a decision on the project.

PRIOR ENVIRONMENTAL DOCUMENT

The Program Environmental Impact Report (EIR) for the 2011 General Plan update was certified by the Planning Commission in September 2010 and by City Council in December 2011.

The General Plan Program EIR evaluated citywide effects on the environment from incremental growth to the year 2030 under General Plan policies and programs. The General Plan contemplates growth by the year 2030 of up to 1.5 million square feet of net additional commercial and other non-residential development and up to 2,800 additional housing units.

Class 1 Impacts

The EIR analysis identified significant traffic and climate change impacts that could not be fully mitigated (Class 1 impacts) from General Plan policies and citywide incremental growth to the year 2030. An increase from 13 to 20-26 roadway intersections at 77% or greater volume-to-capacity ratio was identified. Citywide greenhouse gas emissions were projected as increasing and therefore potentially not meeting State AB 32 emission targets for 2020 and then-undefined SB 375 regional targets.

The EIR also identified that these traffic and climate change impacts could potentially be substantially reduced with implementation of a robust expansion of transportation demand management measures including parking pricing. These mitigation measures were included in the General Plan but City Council found that providing an upfront commitment as to the extent and method and timing of implementation was not feasible. As such, full mitigation credit was not given for the purpose of CEQA impact analysis. In adopting the General Plan, the City Council adopted findings of overriding consideration that the benefits of the Plan outweighed these potential significant impacts, thereby finding these impacts to be acceptable.

An Addendum to the FEIR (6-18-12) for the proposed City Climate Action Plan documents further analysis of climate change demonstrating that impacts associated with citywide greenhouse gas emissions would be less than significant (Class 2).

Class 2 Impacts

The EIR analysis identified the following potentially significant impacts that could be mitigated to less than significant levels (Class 2 impacts): air quality (*diesel emissions*); biological resources (*upland and creek/riparian habitats and species*); geological conditions (*sea cliff retreat*); heritage resources (*effects of development on historic resources*); hydrology (*extended range sea level rise*); noise (*transportation noise*); open space (*loss or fragmentation of open space*); public utilities (*solid waste management*); and transportation (*intersections with mitigation; roadway corridor congestion*).

Identified mitigation measures associated with these impacts were incorporated into the General Plan as policies and programs.

Class 3 Impacts

The EIR analysis concluded that with policies and programs already in place, the following other impacts would be less than significant (Class 3 impacts): air quality (*consistency with Clean Air Plan for air quality standards; construction emissions*); biological resources (*grasslands; coastal resources; individual specimen trees*); geological conditions (*seismic, geologic, soil hazards*); hazards (*accident risks, wildfire; hazardous materials*); heritage resources (*archeological and paleontological resources*); hydrology and water quality (*development in floodplains and near creeks; storm water runoff; water quality of creeks, groundwater, coastal and marine water*); noise (*noise guidelines; mixed use nuisance noise; construction noise*); open space and visual resources (*scenic views; community character; lighting*); public services (*police; fire protection; parks and recreation; schools*); public utilities (*water supply, wastewater treatment*); transportation (*reduction in per capita vehicle commute trips – Class 4 beneficial*).

Additional Environmental Analysis

The EIR also included detailed analysis of impacts associated with energy, climate change (both greenhouse gas emissions contributing to climate change, and climate change effects on the City), population and jobs/housing balance, and socioeconomic issues.

CHANGES IN ENVIRONMENTAL CIRCUMSTANCES

No substantial changes in environmental circumstances on the ground have occurred since the December 2011 General Plan adoption and EIR certification. No changes to Federal or State historic resources regulations or guidelines have occurred.

CURRENT PROJECT DESCRIPTION: HISTORIC RESOURCES ELEMENT AMENDMENT

The Historic Resources Element (HRE) proposed goals, policies, and implementation measures are similar to the policies analyzed in the 2011 General Plan Update HRE and the Cultural and Historic Resources section of the Conservation Element. The following policy topics appear in the 2011 General Plan HRE and/or Conservation Element as well as the proposed HRE:

- Protection of historic and archaeological resources through appropriate regulatory tools such as buffers, transfer of development rights, reduced densities near resources, adaptive reuse, design districts, designations
Conservation Element: Policies 2.0 and 3.0
2011 HRE Framework: Policies HR2-Historic Structures and HR3-Historic Resource Protection
6-18-12 Task Force HRE: Policies HR1-Protect Historic and Archeological Resources
- Protection of historic and archaeological resources through ensuring compatible development through review processes
Conservation Element: Policy 1.0
2011 HRE Framework: Policy HR4-Development Adjacent Historic Structures
6-18-12 Task Force HRE: Policy HR2-Ensure Respectful and Compatible Development
- Adaptive reuse support
2011 HRE Framework: Policy HR1-Adaptive Reuse
6-18-12 Task Force HRE: Policy HR4-Adaptive Reuse
- Promoting public awareness of historic and archaeological resources
2011 HRE Framework: Policies HR5-Increase Historical Appreciation and HR6-Chumash Culture and Archeological Resources
6-18-12 Task Force HRE: Policy HR9-Increase Awareness of Santa Barbara's Heritage
- Surveying, documenting and designating historic resources in the community
Conservation Element: Policies 2.0 and 3.0
2011 HRE Framework: Policy HR3-Historic Resource Protection
6-18-12 Task Force HRE: Policy HR8-Survey and Document All Historic Resources
- Governmental coordination, uniformity in regulations, and effectiveness in addressing and protecting historic and archaeological resources
Conservation Element: Policy 4.0
6-18-12 Task Force HRE: Policy HR10-Assure Governmental Effectiveness

All of the topics covered by the existing Historic Resources Framework and existing Cultural Resources Section of the existing Conservation Element are covered in the proposed Historic Resources Element.

Additional and more detailed goals, policies and implementation items are included in the proposed HRE. The intent of the new items is the same as it was for the existing documents, and the result of the new items may be greater protection of historic resources in some cases. New topics include the following:

Two new goals elevate topics of governmental effectiveness (“Governmental Cooperation”) and the importance of historic resources preservation in neighborhoods (“Neighborhood Historic Preservation”).

New policies and associated implementation measures expand on the importance of:

- avoiding demolition of historic resources (Policy HR3-Discourage Demolition)
- protection of neighborhood historic resources (Policy HR5-Protect Neighborhood Historic Resources)
- streetscape and landscape historic resources (Policies HR6-Protect Traditional Public Resources and Streetscapes and HR7-Protect Historic Landscapes)
- surveying and documenting resources (Policy HR8-Survey and Document All Historic Resources)

FINAL PROJECT IMPACTS AND MITIGATIONS

Historic Resources - The FEIR analysis found impacts of the General Plan Update to be less than significant with incorporation of additional policy protections for historic resources, including buffer provisions and additional design/historic district protections (Class 2 impact). The FEIR Hybrid Alternative assumed incorporation of these additional policy protections and also reduced the area for higher density residential development in the Downtown to assure compatibility with the historic character. The final GPU also incorporated the additional buffer and district policy protections and further reduced areas with the higher density incentive designations.

The proposed Historic Resources Element has wording revisions and additions to the Conservation Element policies and 2011 GPU policies (including FEIR mitigation measures incorporated as GPU policies), but the intent and effect of the refined policies is similar. [Note: policy numbers have changed between the FEIR, the Conservation Element and 2011 adopted GPU; and the proposed replacement HRE.]

The historic resources impacts of the final GPU with incorporation of the proposed Historic Resources Element would be similar or slightly less than impacts identified in the FEIR and would remain **less than significant (Class 2)**.

Open Space and Visual Resources – Policy provisions directing in-fill development to central areas of the City and providing programs protective of open space remain unchanged by the proposed HRE. There is a policy directing protection of viewscales in the proposed HRE which would further support visual resource protection. The impact of gradual loss of open space would remain **less than significant (Class 3)**.

Other Impacts – Environmental impacts under the HRE policy amendments would be similar to those identified in the FEIR. No changes from impact significance classifications identified in the FEIR (i.e., Class 1, 2, or 3 impacts) would result from refinements to the historic resources protection policies.

Most of the mitigation measures identified in the FEIR to reduce potentially significant impacts were incorporated into the final General Plan Update policies and programs. These measures address traffic congestion; greenhouse gas generation; highway diesel exhaust; upland, creek/riparian, and coastal habitats and species; coastal bluff retreat; hazardous materials collection facility capacity; historic resources; sea level rise; highway noise; open space; solid waste management facility capacity, and jobs/housing balance.

CEQA FINDING

Based on the Addendum review of the proposed Historic Resources Element, in accordance with State CEQA Guidelines Section 15612, no Subsequent Negative Declaration or Environmental Impact Report is required for the project because the project setting, description, impacts, and mitigations do not involve new significant impacts or a substantial increase in the severity of impacts previously identified in the final General Plan Program EIR.

This Addendum, together with the certified Program EIR, constitutes adequate environmental documentation in compliance with CEQA for the proposed Historic Resources Element.

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Reviewed by: Bettie Weiss Date: 7.3.12
Bettie Weiss, City Planner

References:

Certified Final EIR for Plan Santa Barbara General Plan Update (September 2010) and FEIR Addendum (December 2011).

Addendum to Program Environmental Impact Report for the Plan Santa Barbara General Plan Update for draft City of Santa Barbara Climate Action Plan (June 18, 2012).