

Appendix L

Addendum to Program EIR





ADDENDUM TO PROGRAM ENVIRONMENTAL IMPACT REPORT for the 2011 *Plan Santa Barbara* General Plan Update (SCH 2009011031)

FOR: CITY OF SANTA BARBARA 2013 SAFETY ELEMENT

April 30, 2013

This addendum to the certified Final Environmental Impact Report (FEIR) for the 2011 *Plan Santa Barbara* General Plan Update documents California Environmental Quality Act (CEQA) analysis for the 2013 Safety Element. The Element would amend the City of Santa Barbara General Plan and replace the existing 2011 General Plan Safety and Public Services Element (including 1979 Safety Element policies and 2011 Update policies) and the 1981 Local Coastal Program (LCP) Hazards Section. Several existing policies will be moved to the Environmental Resources Element. Others policies have been repositioned in the 2013 Element or deleted when no longer necessary. The intent of the Element is to avoid or reduce the risks and effects of natural and human-caused hazards in Santa Barbara. The 2013 Safety Element policies would incorporate and augment General Plan policies and programs previously studied in the citywide General Plan Program FEIR, and do not raise new environmental issues or significant impacts.

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 do not involve 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 reduction 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 documented 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 roadway improvement 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 relevant Federal or State regulations or guidelines have occurred.

CURRENT PROJECT DESCRIPTION: PROPOSED SAFETY ELEMENT UPDATE

The 2013 Safety Element includes updated information describing natural- and human-caused hazards that may affect the City; provides maps depicting areas of the City that may be affected by hazards; describes actions being implemented by the City to reduce hazard-related risk, and to respond to emergencies that do occur.

The proposed goals, policies, and implementation measures in the 2013 Safety Element are similar to the policies within the existing 1979 Safety Element and 1981 Local Coastal Plan, and the new policies analyzed in the 2011 General Plan Update Safety and Public Services Element. They include policies pertaining to:

- Emergency Response Planning
- Geologic and Seismic Hazards
- Fire Hazards
- Flooding Hazards
- Hazardous Materials
- Public Safety
- Public Services

Policies provided by the 2013 Safety Element address the hazards identified by the Element and are intended to promote community resilience, minimize risk presented by natural- and human-caused hazards, and facilitate the City's development review process. All of the topics covered by the existing Safety and Public Services Element are covered in the 2013 Safety Element. Existing policies related to water supply, wastewater, and solid waste management will be transferred to the Environmental Resources Element of the General Plan.

The hazard reduction and response planning policy issue areas addressed in the 2013 Safety Element are summarized below:

Emergency Response Planning. These policies address issues related to promoting community resilience; and the ability of the community to respond to emergencies, disasters and possible climate change-related effects.

Development Review. Policies provided in this section promote hazard-related risk reduction through the avoidance of areas subject to hazards, the implementation of project-specific design measures, compliance with applicable regulatory requirements, and the implementation of mitigation measures identified during the development review process.

Geologic and Seismic Hazards. These policies address the various hazards that have the potential to affect Santa Barbara, and provide development review requirements and project design measures that minimize hazard-related risk. Hazards addressed include earthquake fault rupture, ground shaking, liquefaction, tsunami, seiche, landslides, sea cliff retreat, soil erosion, expansive soils, radon, and high groundwater.

Fire Hazards. This section provides policies that promote wildfire hazard risk reduction through actions such as development limitation, vegetation management, defensible space requirements, creek management, water supply, and evacuation routes and tactical areas in the Extreme Foothill and Foothill High Fire Hazard Zones. Policies that address post fire recovery and urban structural fires are also provided.

Flood Hazards. Policies are provided to reduce impacts that may result from stream flooding and inundation due to dam failure. Policies also address the implementation of appropriate actions to minimize coastal erosion and inundation effects that could be caused by a climate change induced rise in sea level.

Hazardous Materials. Policies are provided to reduce the potential for exposure to hazardous materials from prior land or groundwater contamination and pest control, and provide for proper disposal of household hazardous waste and pharmaceutical waste.

Public Safety. This section provides policies to minimize risk associated with electromagnetic fields, natural gas pipelines, aircraft, and hazardous substance transportation.

Public Services. These policies address safety-related infrastructure improvements, and include items such as providing funding for improvements to structures and services that should remain functional during a disaster or emergency.

PROJECT IMPACTS AND MITIGATIONS

Geologic, Hazards, and Hydrology Impacts

Based on careful analysis of existing environmental conditions, extensive existing City policies and programs, and General Plan update policies addressing growth and the environment, the General Plan FEIR concluded that many safety-related impacts would be less than significant (Class 3), including those pertaining to geological conditions (seismic, geologic and soil hazards), hazards (accident risks, electromagnetic fields, hazardous materials exposure, wildfire hazards), and hydrology (flooding). The 2013 Safety Element retains and augments the protective policies addressing these issues, and no change to identified less than significant impacts would result.

The analysis of geological conditions in the FEIR identifies a potentially significant impact from the effect of continuing sea cliff retreat on a small number of structures that could be developed or modified near coastal bluffs over the next 20 years under the General Plan. The 2013 Safety Element carries forward the EIR coastal bluff retreat mitigation measures for shoreline management planning and

development guidelines that were included as policies in the 2011 General Plan and Climate Action Plan. The policies have been revised slightly to enhance clarity regarding threatened coastal properties and the use of coastal protection structures, and augmented with additional land use and design guidance (2013 Safety Element policies S18.0, S19.0, S20.0, S20.1, S20.2, S20.3, S21). With inclusion of these identified mitigating policies, potential significant impacts from sea cliff retreat will be reduced and the residual impact remains less than significant with mitigation.

The FEIR analysis of hazardous materials issues identifies a potentially significant impact from inadequate community hazardous waste collection facility capacity for the next 20 years. The household hazardous materials mitigation measure included in the 2011 General Plan policies has been retained in the 2013 Safety Element as policy S37.1. The FEIR concluded that the inclusion of this measure in the General Plan will result in avoidance of a significant impact. The residual impact remains at a less than significant level for the 2013 Safety Element.

The FEIR analysis of hydrology issues identifies a potentially significant extended range impact of increased storm flooding and inundation due to climate change - induced sea level rise along streams and drainages in lower-lying areas of the Waterfront, Downtown, and East Side. The FEIR mitigation measures for adaptive management planning were incorporated into the General Plan Environmental Resources Element and the Climate Action Plan, and are included in the 2013 Safety Element as policy S35.3 (Sea Level Rise Adaptation). Additional sea level rise adaptation measures identified in the Climate Action Plan are also reflected in the 2013 Safety Element policies S35.1 (Monitoring, Data Collection, and Analysis of Sea Level Rise), S35.2 (Sea Level Rise Risk Assessment and Vulnerability Analysis), and S36.0 (Future Inundation). The residual impact remains Class 2, less than significant with mitigation.

The existing General Plan also contains policies reflecting recommended measures identified in the FEIR that further benefit reduced impacts. The General Plan policies related to prudent avoidance of electromagnetic hazard risks (PS 9.2, PS 9.3) have been retained as S40 and S40.1 in the 2013 Safety Element. General Plan policies PS14 and PS15 regarding water system improvements for firefighting have been retained as policies S29.0 and S30.0 respectively in the 2013 Safety Element. FEIR recommended measures pertaining to pharmaceutical waste collection and integrated pest management that were included in the 2011 General Plan Environmental Resources Element have been retained.

Policies PS4, PS5, PS6 and PS7.4 of the General Plan regarding water supply will be moved into the Environmental Resources Element. Policy 9.4 related to conducting a Vapor Barrier Study has not been included in the 2013 Safety Element. This study has been completed by the Public Works Department and is available as a resource for use in the development review process. With the study complete, policy PS9.4 is no longer necessary in the Safety Element.

Additional policies included in the 2013 Safety Element replace other existing 1979, 1981, or 2011 General Plan and Local Coastal Plan policies (addressing emergency response planning, geologic and seismic hazards, fire hazard, flood hazard, hazardous materials, and public safety). These policies serve to reduce risks and hazard impacts and do not result in significant environmental impacts. No change to FEIR impact evaluation would result.

Other Environmental Impacts

The public safety policy protection measures of the 2013 Safety Element are not substantially different than those of the existing General Plan. The policies would not result in significant impacts associated

with other environmental conditions (air quality, biological resources, heritage resources, water quality, noise, open space and visual resources, public services, public utilities, and transportation).

No changes from impact significance classifications identified in the FEIR (i.e., Class 1, 2, or 3 impacts) would result from the updated information and policies of the 2013 Safety Element and LCP Hazards Section Amendment.

CEQA FINDING

Based on the Addendum review of the 2013 Safety 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 General Plan Program EIR, constitutes adequate environmental documentation in compliance with CEQA for the 2013 Safety Element and LCP Hazards Section Amendment.

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Reviewed by: Barbara R. Shelton Date: 4/30/13
Barbara Shelton, Environmental Analyst

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).