

ATTACHMENT B
CONSISTENCY ANALYSIS WITH THE CABRILLO BUSINESS PARK FINAL EIR

Cabrillo Business Park Lot 7 Building – Navigator Way
6759 Navigator Way; APN 073-610-040
Case No. 19-123-PCR-RV-OSP

1.0 PROJECT DESCRIPTION

The project includes the following:

A Revised Project Clearance (PCR) for one new building, and an Overall Sign Plan (OSP) for new signage for Lot 7.

Project Clearance

The property's zoning is SP-CBP (CBP Specific Plan), with a sub-zoning of I-BP (Business Park). The General Land Use designation is I-BP (Business Park).

On the newly adjusted Lot 7 (2.11 acres), one two-story building consisting of 36,432 square feet will be constructed. The research and development/office building, will have lot coverage of 30.31%. The building will be 34 feet tall, with a mechanical equipment screening area extending upward an additional 4 feet, for a total building height of 38 feet. The building will have a floor area totaling 36,432 square feet, as follows: 9,216 square feet manufacturing; 9,382 square feet research and development, 9,216 square feet warehouse, and 8,816 square feet office. A total of 94 parking spaces will be provided. The parking spaces will be composed of 24 compact spaces, 4 ADA spaces, and 66 standard parking spaces. A trash enclosure will be located along the southern property line screened by landscaping. Customer pick-up and shipping/receiving access will be located in the loading area along the southeastern portion of the site, while employee/visitor access will be located along the north elevation. Access to adjacent Lots 5, 6, and 9 will be available along the drive aisles adjacent to the northern elevation of the building, as well as the southern property line. Landscape islands will occur within the north, south and east parking lots, with a landscaped employee/lunch area adjacent to the east elevation of the building. A decomposed granite pedestrian path will be located adjacent to the north elevation of the building and provide pedestrian access through to Lots 5, 6, 9, Navigator Way, and Coromar Drive. Drainage will be handled by a system of bioswales and storm drains and will be directed to an off-site detention basin (approx. 0.42 acres) located in the southern portion of Lot 19. Grading volumes will consist of 2,300 cubic yards of cut and 2,200 cubic yards of fill (to be provided from CBP stockpiles). The Project Statistics for Building 7 are identified below in Table 1.

Table 1: Project Statistics for Building 9

	Specific Plan Criteria	Proposed Project	Meets Minimum Criteria Y/N
Building Coverage	N/A	30.31%	Y
Landscape Coverage	Minimum cumulative landscaping percentage must not be less than 42% for all lots within CBP.	CBP will result in a cumulative landscaping percentage of 42.2% with implementation of the project.	Y
Parking	80	94	Y
Setbacks: Front	10 feet	10 feet	Y
Side	20 feet	20 feet	Y (with truck ramp modification and platform request)
Rear	10 feet	10 feet	Y
Building Height	41 feet. (35 feet to top of structure/parapet and additional 6 feet for mechanical equipment screening).	34 feet. (34 feet to top of structure/parapet and additional 4 foot for mechanical equipment screening).	Y

Overall Sign Plan (OSP)

Per the CBP OSP, two wall signs measuring 64 square feet each are allowed on the building. The applicant is requesting one wall sign measuring 64 square feet on the northwestern corner of the building and one wall sign measuring 64 square feet on the northeastern corner of the building. Other signs, such as a freestanding monument sign, directional signs, and other associated signage meet the criteria listed under the current CBP OSP.

2.0 PURPOSE

In order to approve the project, a determination that the project is consistent with the CBP Final EIR is required under the California Environmental Quality Act (CEQA). Thus, environmental review is required pursuant to CEQA (Public Resources Code §§ 21000 et seq.), the CEQA Guidelines (14 California Code of Regulations §§ 15000 et seq.), and the City of Goleta Environmental Review Guidelines. This document serves as the project’s environmental analysis pursuant to CEQA.

3.0 BACKGROUND

The Cabrillo Business Park Project (“CBP Project”) included a Rezone, Development Agreement, Vesting Tentative Map, Development Plan, and Road Naming. A Final Environmental Impact Report for the Cabrillo Business Park Project (2007 FEIR; SCH #2000041129) (“FEIR”) was completed for the CBP Project and certified in April 2007 (inclusive of an Errata Sheet dated April 23, 2007). Several Addenda to the FEIR have been prepared to address changes in the CBP Project and its environmental effects. The FEIR and subsequent Addenda shall collectively be referred to and considered as the CBP Final EIR. The Cabrillo Business Park Specific Plan was approved by the City of Goleta City Council on October 1, 2013 and adopted on October 15, 2013 through Ordinance No. 13-04.

In order to approve the Project Clearance for the project, a determination that the project is consistent with the CBP Final EIR is required.

4.0 RELATIONSHIP OF THE PROJECT TO THE CBP FINAL EIR

The project falls within the scope of the CBP Specific Plan approved earlier as part of the CBP Final EIR. As described in Attachment 1 to this exhibit and incorporated herein by reference, the project is consistent with the CBP Specific Plan Environmental Thresholds Checklist.

5.0 ENVIRONMENTAL ANALYSIS

The CBP Final EIR provided a thorough and comprehensive analysis of the environmental impacts associated with the construction and operation of the build-out of the Cabrillo Business Park.

Section 15168(c)(2) of the CEQA Guidelines states that, if a project is proposed which has been the subject of a previous certified EIR or adopted negative declaration and “[i]f the [City] finds that pursuant to section 15162, no new effects could occur or new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.”

Section 15162 of the CEQA Guidelines defines the conditions under which a subsequent EIR would be required for a project as follows:

1. Substantial changes are proposed in the project which require major revisions of the EIR due to the involvement of new significant environmental effects or substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and/or
3. New information of substantial importance has been forthcoming at this time, which was not known and could not have been known with the exercise of

reasonable diligence at the time the previous EIR was adopted, shows any of the following:

- a. The revised project will have one or more significant effects not discussed in the previous EIR;
- b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The CBP Specific Plan Environmental Guidelines & Thresholds (EGT) establishes an Environmental Thresholds Checklist, prepared consistent with *CEQA Guidelines Section 15168(c)(4)*, for use in evaluating the effects of subsequent activities. The Environmental Thresholds Checklist identifies the areas of environmental impact which were evaluated and/or contemplated by the CBP Final EIR. Since the project is found to be consistent with the Environmental Thresholds Checklist in the CBP Specific Plan, no further environmental review under CEQA is required (*CEQA Guidelines Section 15168(c)(4)*).

Therefore, the project will not result in any new significant environmental impacts not already discussed in the CBP Final EIR.

6.0 FINDINGS

Based on the above analysis, the Planning and Environmental Review Director finds the following:

- 6.1. The project falls within the scope of the CBP Specific Plan approved earlier as part of CBP Final EIR (*CEQA Guidelines Section 15168(e)(1)*).
- 6.2. The CBP Final EIR adequately describes the project for purposes of CEQA (*CEQA Guidelines Section 15168(e)(2)*).
- 6.3. The project does not require major revisions of the CBP Final EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects (*CEQA Guidelines Section 15162(a)(1)*).
- 6.4. No substantial changes have occurred with respect to the circumstances under which the project will be undertaken, which would require major revisions of the CBP Final EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects (*CEQA Guidelines Section 15162(a)(2)*).

- 6.5. No new information of substantial importance, which was not known or could not have been known with the exercise of reasonable diligence at the time the CBP Final EIR was adopted, shows any of the following:
- a. The project will have one or more significant effects not discussed in the CBP Final EIR;
 - b. Significant effects previously examined will be substantially more severe than shown in the CBP Final EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the CBP Final EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative (CEQA Guidelines Section 15162(a)(3)).

**Attachment 1 to Exhibit B
CBP Specific Plan Environmental Thresholds Checklist**

Issue area	Guidelines	Discussion
Traffic Trips (Cumulative Maximum)	The Maximum Cumulative Traffic Trips (MCTT) for all Phases of Development shall not exceed 1,078 PM PHT.	Project is consistent: The project will generate a total of 30 PM peak hour trips (PHTs) on Lot 7. The VTA transfer associated with Case No. 16-160-LLA-VTA approved a transfer of 82 PM PHTs to Lot 7, which means Lot 7 will have a surplus of 52 PM PHTs. The project will not result in an increase in vehicle trips beyond the Maximum Cumulative Traffic Trips of 1,078 PM PHT.
Air Quality/ Greenhouse Gas	As long as MCTT is not exceeded, no additional environmental analysis required. Construction Emissions: Required Mitigation Measures: AQ-1.1, AQ-1.2, AQ-1.3, AQ-2 Operational Emissions: Recommended Mitigation Measures: AQ-4 Toxic Air Contaminants (TACs): Permits from APCD for project emission sources of TAC's shall be processed in accordance with APCD requirements.	Project is consistent. Construction, operational, and toxic air contaminant requirements will be noted on construction plans and periodic site inspections will occur on the site during construction. No additional air quality/greenhouse gas analysis is required as the MCTT will not be exceeded as part of this project.
Archaeological Resources	As long as project is consistent with the mitigation below, no additional environmental analysis required. A memo from project archaeologist shall be reviewed by the City Archaeologist documenting compliance (as applicable) with the following mitigation measures: Required Mitigation Measures: ARCH-1.1, ARCH-1.2, ARCH-1.3, ARCH-3, ARCH-4, ARCH-5, ARCH-6, ARCH-7, ARCH-8, ARCH-9	Project is consistent: Dudek Archeological Condition Compliance Memo (dated September 23, 2016) addresses archaeological compliance for the grading of the project site. The City Archaeologist reviewed the Dudek Compliance Memo and verified conformance with applicable required mitigation measures for Lot 7.
Biological Resources	No impacts to on-site wetlands except as permitted by U.S. ACOE, CDFG, and/or RWQCB.	Project is consistent: The project will not have an impact on designated wetlands as

Issue area	Guidelines	Discussion
	<p>Required Mitigation Measures: BIO-1.1, BIO-1.2, BIO-1.3, BIO-2, BIO-3.1, BIO-3.2, BIO-5.1, BIO-5.2, BIO-6</p>	<p>no wetlands are located on Lot 7 of the project site nor is Lot 7 adjacent to a wetland area or wetland buffer area.</p>
<p>Energy</p>	<p>As long as MCTT is not exceeded, no additional environmental analysis required.</p> <p>Recommended Mitigation Measures: ENERGY-1</p>	<p>Project is consistent. MCTT not exceeded.</p>
<p>Fire Protection/ Hazards</p>	<p>As long as MCTT is not exceeded, no additional environmental analysis required.</p> <p>Required Mitigation Measures: FIRE-1.1, FIRE-1.2, FIRE-1.3</p>	<p>Project is consistent. MCTT not exceeded.</p>
<p>Geologic Resources</p>	<p>As long as MCTT is not exceeded, no additional environmental analysis required.</p> <p>Required Mitigation Measures: GEO-1.1, GEO-1.2</p>	<p>Project is consistent. MCTT not exceeded.</p>
<p>Hazardous Materials/ Risk of Upset</p>	<p>As long as MCTT is not exceeded, no additional environmental analysis required.</p> <p>Required Mitigation Measures: HAZ-1.1, HAZ-1.2, HAZ-2, HAZ-3.1, HAZ-3.2, HAZ-4.1, HAZ-4.2, HAZ-4.3, HAZ-4.4, HAZ-5.1, HAZ-5.2, HAZ-6.1, HAZ-6.2</p>	<p>Project is consistent. MCTT not exceeded.</p>

Issue area	Guidelines	Discussion
<p>Land Use</p>	<p>As long as project is consistent with criteria below, no additional environmental analysis required.</p> <p>Airport Safety Corridor: No building(s) allowed within the 300' Airport Safety Corridor.</p> <p>Airport Clear Zone: Cumulative population density (92.25 acres) within Airport Clear Zone not to exceed 25 persons/ acre.</p> <p>Airport Approach Zone: Cumulative population density (92.25 acres) within Airport Approach Zone not to exceed 25 persons/ acre.</p> <p>Building Height: Maximum Height of 35 feet, from finish grade to top of structure/ parapet. Mechanical screening may extend approximately 6 feet above the structure. Design features, such as rotundas, cupolas, etc. may exceed the maximum building height. All structures required to obtain FAA clearance prior to issuance of Building Permit (BP).</p> <p>Lighting: Exterior site lighting shall be low intensity, low glare, and hooded. No upward lighting. Pole supports w/ darker finish. Wall-mounted and pedestrian lighting heights placed at height to limit unnecessary spill effects while ensuring safety. Submit to ALUC staff.</p> <p>Windows: Exterior structure window glass to be glare-resistant. Submit to ALUC staff.</p> <p>Required Mitigation Measures: LU-1, AES-6, AES-7, LU-4.1, LU-4.2, LU-4.3, LU-6</p>	<p>Project is consistent.</p> <p>Building 7 is located outside the 300' Airport Safety Corridor and the Airport Clear Zone (ACZ);</p> <p>Proposed Building 7 is located within the Airport Approach Zone (APZ). Per the CBP Specific Plan, cumulative population density for the entirety of CBP (92.25 acres) within the APZ must not exceed 25 persons/acre. All projects constructed and/or approved for construction to date (including the proposed project) is 17.5 persons/acre, which is below the review threshold of 25 persons/acre.</p> <p>Building 7 will be a maximum of 38 feet tall (34 feet tall for the building with a mechanical equipment screening area extending an additional 4 feet). As designed, the building is below the maximum building/screen height of 42 feet per the CBP Specific Plan.</p> <p>Exterior site lighting is low intensity, low glare, and hooded. No upward lighting is proposed. Pole supports consist of darker finish and have a maximum height of 21 feet. Wall-mounted and pedestrian lighting heights will be placed at heights to limit unnecessary spill effects while ensuring safety. Window glass will be glare resistant. Exterior site lighting and windows will be reviewed by the Airport Land Use Commission (ALUC) prior to issuance of building permits.</p>
<p>Noise</p>	<p>As long as MCTT is not exceeded, no additional environmental analysis required.</p>	<p>Project is consistent. MCTT not exceeded.</p>

Issue area	Guidelines	Discussion
	<p><u>Construction Noise:</u> Required Mitigation Measures: NS-1.1, NS-1.2</p> <p><u>Operational Noise:</u> Recommended Mitigation Measures: NS-4</p>	
Public Facilities	<p>As long as MCTT is not exceeded, no additional environmental analysis required.</p> <p><u>Construction:</u> Required Mitigation Measures: PF-1</p> <p><u>Operational:</u> Required Mitigation Measures: PF-2, PF-3.1, PF-3.2, PF-3.3</p>	Project is consistent. MCTT not exceeded.
Recreation	<p>As long as recreational amenities on Lots 15 and 16 are not removed or substantially changed, no additional environmental analysis required.</p> <p>Required Mitigation Measures: REC-3</p>	Project is consistent. Recreational amenities on Lots 15 and 16 have been constructed per the CBP Phase II-A permit.
Traffic and Circulation	<p>As long as MCTT is not exceeded, no additional environmental analysis required.</p> <p>Required Mitigation Measures: TR-1, TR-2, TR-3, TR-5, TR-6, TR-7, TR-8, TR-9, TR-12, TR-13, TR-14, TR-16, TR-17, TR-18, TR-19, TR-20, TR-21, TR-22, TR-23, TR-25, TR-26, TR-27, TR-28 [As per the terms of the CBP Development Agreement]</p>	Project is consistent. MCTT not exceeded.
Water Resources/ Flooding	<p>A memo from project engineer shall be reviewed by Public Works Director documenting compliance (as applicable to individual Project Clearances) with the following mitigation measures:</p> <p>Recommended Mitigation Measures: WR-1.1, WR-1.2, WR-1.3, WR-1.4, WR-1.5</p> <p>Required Mitigation Measures: WR-1.6, WR-1.7, WR-1.8, WR-1.9, WR-1.10, WR-1.11, WR-1.12, WR-1.13, WR-1.14, WR-1.15, WR-1.16, WR-1.17, WR-1.18, WR-1.19, WR-1.20</p>	Project is consistent. The project engineer in conjunction with review and approval from the Public Works Department has designed the project to be consistent with the overall drainage design approved for the CBP Development Plan. Impacts to water resources/flooding remain the same.