

ATTACHMENT B
CEQA ANALYSIS FOR THE CABRILLO BUSINESS PARK PROJECT CLEARANCE

Decker's Building 3 Storage Mezzanine
250 Coromar Drive; APN 073-610-010
Case No. 19-116-PCR

1.0 PROJECT DESCRIPTION

The project includes the following:

A Project Clearance (PCR) for a 10,982-square foot, interior storage mezzanine within Building 3 (Deckers).

Project Clearance

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

The applicant proposes revisions to the existing approved Land Use Permit (Case No. 12-034-LUP), specifically to add a second-story mezzanine for storage purposes of campus-related needs, for example, desks, chairs, lighting fixtures, file cabinets, and archived trade show displays and samples. No products for sale will be stored on the premises, as Decker's California Distribution Center is located in Moreno Valley, CA.

The existing building consists of a 29,970-square foot office and warehousing building, known as Building 3 with Cabrillo Business Park. Building 3 was part of the phased build-out of the previously approved Cabrillo Business Park / Deckers project approved on June 28, 2011 (11-037-DPAM), and subsequent Post-Discretionary Land Use Permit (12-034-LUP) issued on July 12, 2012. Building 3 is a one-story, 30-foot tall, 29,970 SF office/storage building, with two trash/recycling enclosures, one off-street loading facility space, an interior bike storage room, and an assignment of 60 parking spaces (of 553 total spaces for the Deckers campus). Building 3 contains 5,790 square feet of office space and 24,000 square feet of storage space.

The applicant seeks approval of 10,982-square foot interior mezzanine for campus-related storage needs. Due to the building being located within the Santa Barbara Airport Clear Zone, and as previously conditioned through Case No. 11-037-DPAM and Case No. 12-034-LUP, Building 3 cannot exceed an occupancy load of 25 people. The mezzanine addition would not change the occupancy load of the building or warrant an increase to the number of employees in the building. There would be no change to the building footprint and no exterior alterations to the building are needed to install the storage mezzanine. Access to the mezzanine would be provided by two separate stairways, as well as a freight-only elevator (employee use is not allowed).

The mezzanine would not result in an increase of PM Peak Hour Trips, as storage for on-campus needs does not generate traffic trips, does not include a warehousing and distribution component, does not warrant the need of additional employees, and does not warrant additional parking requirements.

The resulting 2-story building would be a total of 40,952-square feet, consisting of approximately 5,790 square feet of office space, 34,952 square feet of warehousing space, and 10,982 square feet of storage space.

2.0 PURPOSE

The purpose of this California Environmental Quality Act (CEQA) analysis is to determine whether subsequent environmental review of the Revised Project Clearance is required pursuant to CEQA (Pub. Resources Code, §§ 21000 et seq.) and the State Guidelines for Implementation of CEQA (14 Cal. Code Regs. §§ 15000 et seq.: the “State CEQA Guidelines”). According to State CEQA Guidelines, section 15168, when a program EIR has been prepared for a series of actions that can be characterized as one large project, later activities in the program must be analyzed in light of the program EIR to determine whether an additional environmental document must be prepared. Here, because a program EIR was prepared for the CBP, this document evaluates whether there are environmental effects of the proposed Revised Project Clearance that were not examined in the CBP FEIR. If the Director determines that pursuant to State CEQA Guidelines, section 15162 a subsequent EIR is not required then the Director may approve the activity as being within the scope of the project covered by the program EIR and no new environmental document is required.

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.

4.0 RELATIONSHIP OF THE PROJECT TO THE CBP FINAL EIR

The project falls within the scope of the CBP Specific Plan, the environmental impacts of which were disclosed, evaluated and mitigated to the extent feasible in the CBP Final EIR. As described in Attachment 1 to this exhibit and incorporated herein by reference, the project would not have effects that were not examined in the CBP FEIR and would not result in new or more significant impacts compared to the impacts disclosed in the CBP FEIR. Thus, the impacts of the proposed project are within the scope of the project covered by the CBP FEIR and no new environmental document is required.

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. Because the proposed project would not have effects that

were not examined in the CBP FEIR, and because the proposed project would not trigger any of the events in State CEQA Guidelines section 15162, the proposed project is an activity that is considered as being within the scope of the project covered by the CBP FEIR (*CEQA Guidelines Section 15168(c)*).

Therefore, no new environmental document is required.

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(c)(1)*).
- 6.2. The CBP Final EIR adequately describes the project for purposes of CEQA (*CEQA Guidelines Section 15168(c)(1)*). The project would not have effects that were not examined in the CBP FEIR. (*CEQA Guidelines Section 15168(c)(1)*).
- 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)*; *CEQA Guidelines Section 15168(c)(2)*).
- 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)*; *CEQA Guidelines Section 15168(c)(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); *CEQA Guidelines Section 15168(c)(2)*).

**Exhibit 1 to Attachment 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.	No New Impacts: The project will not generate additional PM peak hour trips (PHTs) beyond the 9 PM Peak Hour Trips previously allocated to the building. 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.	No New Impacts. Construction, operational, and TAC 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	No New Impacts: Building 3 was previously built in in 2013 and complied with the Dudek Archeological Condition Compliance Memo which addressed 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 3. The interior storage mezzanine will not require any grading on the project site.
Biological Resources	No impacts to on-site wetlands except as permitted by U.S. ACOE, CDFG, and/or RWQCB.	No New Impacts: 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 3 of the project site nor is the project expanding the building's footprint.</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>No New Impacts. 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>No New Impacts. 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>No New Impacts. 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>No New Impacts. 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 3 is located outside the 300' Airport Safety Corridor.</p> <p>Building 3 is located within the Airport Clear Zone (ACZ). Per the CBP Specific Plan, cumulative population density for the entirety of CBP (92.25 acres) within the ACZ must not exceed 25 persons/acre. All projects constructed and/or approved for construction to date is 23.2 persons/acre, which is below the review threshold of 25 persons/acre. The interior storage mezzanine will not require the need for additional employees in the building.</p> <p>As previously designed and approved, the building is 30 feet in height and is below the maximum building/screen height of 42 feet per the CBP Specific Plan. The interior storage mezzanine will not change the height of the building.</p> <p>No new exterior site lighting is proposed as part of the project. All existing light will remain low intensity, low glare, and hooded.</p> <p>No new windows are glass are proposed as part of this project.</p>
<p>Noise</p>	<p>As long as MCTT is not exceeded, no additional environmental analysis required.</p> <p>Construction Noise: Required Mitigation Measures: NS-1.1, NS-1.2</p> <p>Operational Noise: Recommended Mitigation Measures: NS-4</p>	<p>Project is consistent. MCTT not exceeded.</p>

Issue area	Guidelines	Discussion
Public facilities	<p>As long as MCTT is not exceeded, no additional environmental analysis required.</p> <p>Construction: Required Mitigation Measures: PF-1</p> <p>Operational: 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: 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 have previously approved the building design to be consistent with the overall drainage design approved for the CBP Development Plan. There will be no new impacts to water resources/flooding will the implementation of the interior storage mezzanine.