



CITY OF GOLETA

FINAL

MITIGATED NEGATIVE DECLARATION

for the

SOUTH KELLOGG RECYCLING FACILITY PROJECT

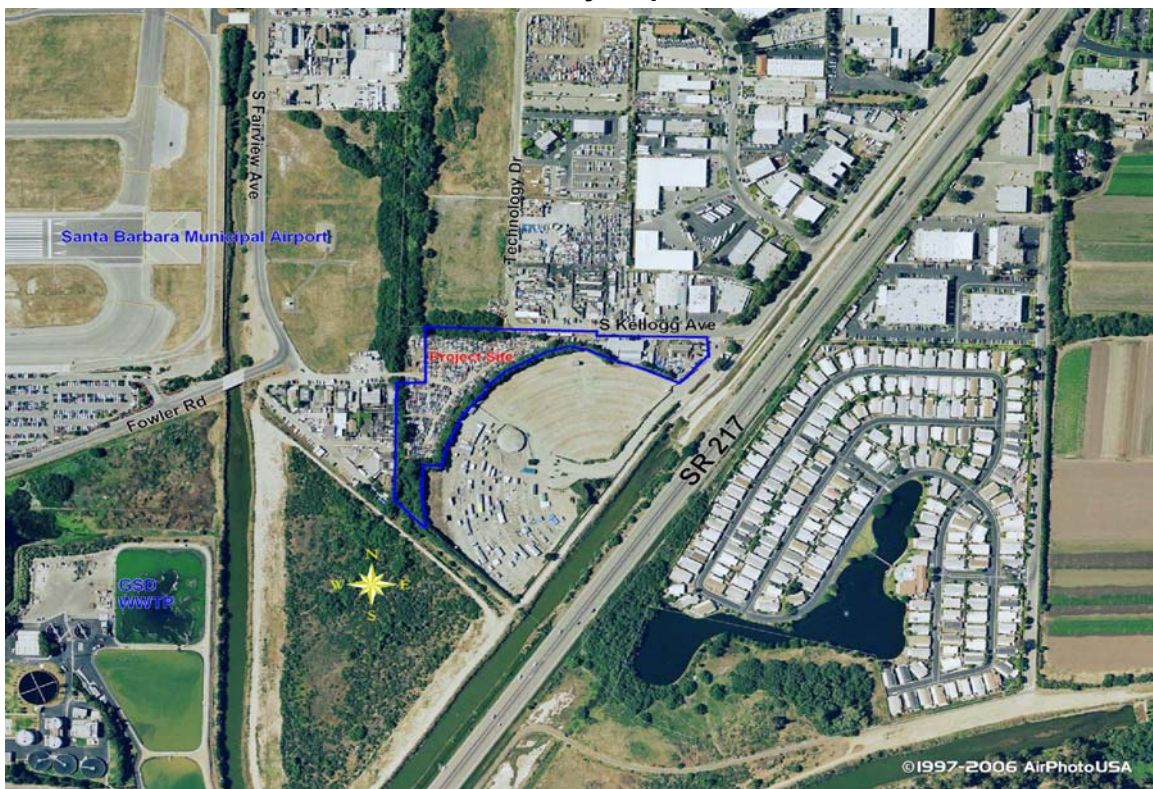
October 14, 2011



**CITY OF GOLETA
FINAL MITIGATED NEGATIVE DECLARATION
October 14, 2011; 11-MND-002**

1. **PROJECT TITLE:** South Kellogg Concrete and Asphalt Recycling Facility; Case 09-133-DP
2. **LEAD AGENCY NAME AND ADDRESS:** City of Goleta, 130 Cremona Drive, Suite B, Goleta, CA 93117
3. **CONTACT PERSON AND PHONE NUMBER:** Alan Hanson, Senior Planner; (805)961-7549
4. **APPLICANT:** Al Rodriguez, United Paving, 3463 State Street, Suite 522, Santa Barbara, CA 93105
5. **AGENT:** Peter Hunt, PO Box 92045, Santa Barbara, CA 93190
6. **PROJECT LOCATION:** 903 South Kellogg Avenue; APN 071-190-034 within the Coastal Zone of the City.

Vicinity Map



7. **PROJECT DESCRIPTION:** The project includes the following elements:
- 1) A Development Plan for a concrete and asphalt/aggregate concrete recycling facility at APN 071-190-34 also known as 903 South Kellogg Avenue. The project site is currently developed with three existing buildings on the 4.935 acre site which have been used for 40 years as offices for a towing service and general contractor, plus another building used as auto body repair shop. The existing buildings total 10,741 square feet. It is estimated that the existing buildings employ 14 people. The remainder of the project site has been used as an auto salvage yard since at least 1983. Under the submitted Development Plan application, that portion of the subject parcel that has been the site of the auto salvage yard would be used for the concrete and asphalt/aggregate concrete recycling facility producing building materials such as Class 2 road base. One of the existing businesses onsite, Thomas Towing, would vacate the property and the space this business currently occupies would be used by the applicant as supporting office space for the project.
 - 2) Operation of the recycling facility would occur Monday thru Friday from 6:00 am to 4:00 pm on a wholesale basis only. No retail sales would occur. The facility would include a 960 square-foot, one-story sales-office building with six employee/customer standard size commercial parking spaces, one handicapped space, and an 8' x 80' scale. Concrete and asphalt/aggregate concrete spoil for crushing and screening to produce road base and other construction materials would be stored in an approximately 20,000 square-foot area along the western property line and west of the sales-office building. The operations area for concrete and asphalt/aggregate concrete crushing/recycling totals approximately 18,400 square feet and would lie immediately to the north of the raw material storage area. Another 20,000 square-foot storage area for finished road base/building material (crushed and screened) would be maintained to the east of the operations area. All material stockpiles (raw and finished) would be limited in height to a maximum of 34' above mean sea level (msl). To the south of the sales-office building/scale, an 1,840 square-foot garage building would be constructed to store equipment when not in use. The new recycling facility would have as many as five (5) employees.
 - 3) **Crushing would occur using an electrical powered portable impact crusher, an electric/hydraulic powered screening plant, and an electrical powered radial stacker.** In addition, project operations would utilize diesel driven heavy equipment to load and move raw materials and finished product around the site. Such equipment would be stored in the equipment storage garage located to the south of the operations area; all equipment fueling and maintenance would be done either offsite at equipment dealer facilities or provided onsite by mobile vendors.
 - 4) The project site would be raised through the importation of 12,000 cubic yards of fill material to a maximum elevation of 14 feet above mean sea level. This filled area would be graded so that all stormwater runoff either flows to a central catch basin in the operational area that would convey collected runoff into a 6' wide, 2' deep, 250-foot long "rain garden" detention basin that would discharge collected runoff into Old San Jose Creek; or flows to the north and

east to be captured by a 270' long gravel-lined 2' x 6" asphalt V-swale before being discharged through a catch basin into the existing flow-line of South Kellogg Avenue for eventual transport to Old San Jose Creek. The western edge of the raised operational area would be supported by a retaining wall ranging from four (4) to six (6) feet in height, depending on natural grade. The perimeter of all storage and operational areas abutting any Environmentally Sensitive Habitat Area (ESHA) and/or drainage course would be established by the installation of concrete gravity walls to prevent spill-over of raw and finished material into any such sensitive areas.

- 5) Access to the site would be provided via a paved and gated entrance off South Kellogg Avenue. Access through the operations area would be provided by a minimum 16-foot wide all weather Class II compacted road-base roadway that would loop around the raw and finished storage areas and crusher site. Water service for the project would be provided by the Goleta Water District and sewer service by the Goleta Sanitary District. Project landscaping includes a new landscape screen along the northern property line to screen the facility from South Kellogg Avenue. No removal of any native vegetation would occur nor is any new signage included as part of this application. As all material recycling operations would be conducted during daylight hours, no exterior lighting of the project site would be installed beyond outdoor security lighting for the sales-office and garage buildings.
 - 6) The application includes a request for a modification to the requirements of Sections 35-84A.12(3) and 35-84A.12(5), Article II, Chapter 35 of the Municipal Code to allow the installation of a six-foot high chain link fence with baffles or similar screening material on the front property line instead of ten (10) feet back from the front property line thereby precluding the installation of a 10-foot landscape strip along the front property line to provide for improved property security and protection of onsite drainage facilities along the front (northern) property boundary.
8. **APPROVAL REQUIRED BY OTHER PUBLIC AGENCIES:** As the project site lies within the Coastal Zone of the City, and the City has no Coastal Commission certified Local Coastal Program (LCP), any Coastal Development Permit(s) (CDP) required for the project under the Coastal Act can only be issued by the Coastal Commission. Therefore, the City's review authority would be limited to local review in concept of the Development Plan and Conditional Use Permit applications. Before any development can occur, the applicant would have to obtain a CDP from the Coastal Commission. The City would then issue a follow up Land Use Permit (LUP) to complete the permitting process.

9. SITE INFORMATION:

Site Information	
Existing General Plan Land Use Designation	Service/Industrial; I-S
Zoning Ordinance, Zone District	Service/Industrial Goleta; M-S-GOL and Light Industry; M-1
Site Size	4.935 acres
Present Use and Development	Three (3) existing commercial buildings totaling 10,741 square feet and remnants of a prior auto salvage yard
Surrounding Uses/Zoning	North: S Kellogg Ave/commercial/industrial uses zoned M-1 and M-S-GOL South: Gas Company property/County of Santa Barbara East: Swap Meet/Drive-In property zoned M-1 and M-S-GOL West: City of Santa Barbara Airport property and commercial/industrial uses in the City of Goleta zoned M-S-GOL
Access	Existing: South Kellogg Avenue Proposed: New entrance off South Kellogg Avenue
Utilities and Public Services	Water Supply: Goleta Water District Sewage: Goleta Sanitary District Power: Southern California Edison Natural Gas: Gas Company Cable: Cox Cable Telephone: Verizon Fire: Santa Barbara County Fire Department, Station #12 School Districts: Santa Barbara School and High School District/Goleta Union School District

10. ENVIRONMENTAL SETTING

Baseline for Environmental Review

The project site is currently developed with three existing buildings on the 4.935 acre site. Two of these buildings are currently used as offices for a towing service and a general contractor, and the third is used as an auto body repair shop. These existing buildings total 10,741 square feet and are currently estimated to accommodate 14 employees. The remainder of the project site has been used as an auto salvage yard since at least 1983 in association with A&G/Mission Auto Wrecking whose office is located offsite at 5939 Placencia Street. While the majority of wrecked vehicles have been removed from the property, some cars remain and the auto salvage storage yard is considered a continuing use at this time. Therefore, the aforementioned elements of the existing development onsite constitute the project's environmental baseline for the subject 4.935 acre property for the purposes of project environmental review pursuant to CEQA. All other unpermitted development onsite, including existing storage containers, storage sheds, and the stockpiling of dirt and asphalt/concrete spoil did not exist at the time of completeness determination. Therefore, they are **not** considered part of the project's environmental baseline and are **not** included in any baseline calculations for the purpose of identifying and evaluating potential project environmental effects that could result from project implementation.

The one exception to this baseline determination is that the applicant is not given any credit for baseline traffic levels associated with the existing auto salvage storage area use since access to that site from auto wrecking business office has been historically provided via an Arizona crossing over Old San Jose Creek from Placencia Street and as such, only resulted in the use of South Kellogg Avenue and Technology Drive on such a minimal basis as to not rise above a di minimis level in the past.

Topography and Soils

The topography of the project site is nearly level with a gentle slope from the east to the west along Old San Jose Creek with approximately four (4) feet of fall between the eastern side of the project (~feet above mean sea level) to the flow-line of the creek channel (~6 feet above mean sea level). Soils onsite consist of primarily Camarillo fine sandy loam, 0% to 2% slope which are considered non-prime soils by the US Soil Conservation Service.

Fauna, Flora and Surface Water Bodies

The site currently supports, and has supported for the past 40 years, a variety of uses including an auto wrecking/storage yard, a single-family residence, a towing service, construction business office and storage area, and an auto repair facility. The majority of the site is flat, consisting of bare ground and an auto wrecking/storage yard with little to no native vegetation with the exception of a 460 foot-long stretch of Old San Jose Creek which forms the western boundary of the site. An approximately 250-foot long east/west flowing unnamed, drainage swale tributary to Old San Jose Creek until recently supported scattered willow scrub patches (before the unpermitted removal by a third party) occurs just north of the project boundary. The unpermitted removal of the willows took place after the completeness determination for this project.

Four vegetation communities/land cover types exist onsite; bare ground/ruderal, willow/cottonwood scrub, willow scrub, and ornamental plantings. The willow/cottonwood scrub and willow scrub are directly associated with Old San Jose Creek, which is designated as an ESHA on Figure 4-1 of the City's General Plan/Coastal Land Use Plan Conservation Element, as well as the existing 250-foot drainage swale on the abutting property to the north.

Common wildlife species observed onsite included cabbage butterfly (*Pieris rapae rapae*), Baja California chorus frog (*Pseudacris hypochondriaca hypochondriaca*), and western fence lizard (*Sceloporus occidentalis*), American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*), house finch (*Carpodacus mexicanus*), mourning dove, (*Zenaida macroura*), and northern mockingbird (*Mimus polyglottos*) (Dudek; *Biological Resources Assessment, Concrete Recycling Facility, 903, 905, 907, & 909 South Kellogg Avenue*, dated July 14, 2010). Other common wildlife species adapted to urban environments and expected to utilize the site for foraging and/or nesting/breeding include pocket gopher (*Thomomys* spp.), deer mouse (*Peromyscus maniculatus*), striped skunk (*Mephitis mephitis*), raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), coyote (*Canis latrans*), rabbit (*Sylvilagus* spp.), red-shouldered hawk (*Buteo jamaicensis*), alligator lizard (*Elgaria multicarinata webbiai*), and gopher snake (*Pituophis catenifer*) (Dudek; July 14, 2010). The diversity of native wildlife species detected on site is limited and includes those species that are more common and have adapted to urban settings.

Cultural Resources

The project site is located within the historic boundaries of the Goleta Slough. Research and analysis of the estuary's geomorphology, sedimentation processes, and descriptions of the wetland by late 18th century Spanish chroniclers (Stone, 1982) conclude that the Slough extended up to 10 feet above sea level at high tide, allowing for passage of boats into the waterway from the ocean in and around Mescalitan Island (Dudek; *Archaeological Resources Assessment, Concrete Recycling Facility, 903, 905, 907, & 909 South Kellogg Avenue*, dated June 18, 2010). The project site, located northeast of Mescalitan Island and south of the Fairview Road/Hollister Avenue intersection at an elevation of less than 10 feet above mean sea level and was subject to tidal inundation as late as the 19th and 20th centuries (Dudek; June 18, 2010).

Surrounding Land Uses

The project site is bordered on the east by the existing swap meet/drive-in theater complex and on the west by Old San Jose Creek, City of Santa Barbara Airport property, and commercial/industrial development of Placencia and Corta Streets. To the north are South Kellogg Avenue and a mix of commercial/industrial uses including auto body and auto repair, contractor's storage, etc. and to the south is Old San Jose Creek and undeveloped land within the County of Santa Barbara owned by the Gas Company.

11. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist and analysis on the following pages.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Utilities/Service Systems
- Mandatory Findings of Significance

12. DETERMINATION

On the basis of this environmental checklist/initial study:

- I find that the project COULD NOT have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.
- I find that although the project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier environmental impact report or mitigated negative declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier environmental document, including revisions or mitigation measures that are imposed upon the project and that a subsequent document containing updated and/or site specific information should be prepared pursuant to CEQA Sections 15162/15163/15164.
- I find that although the project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier environmental impact report or mitigated negative declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier environmental document, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

Mitigated Negative Declaration Determination made on June 24, 2011 by Patricia S. Miller, Planning Manager, City of Goleta Planning and Environmental Services (on file).

13. EVALUATION OF ENVIRONMENTAL IMPACTS:

- (a) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer

- should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- (b) All answers must take into account the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
 - (c) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
 - (d) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (e) below, may be cross-referenced).
 - (e) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
 - 1) Earlier Analysis Used. Identify and state where they are available for review.
 - 2) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - 3) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
 - (f) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). References to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - (g) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - (h) Lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected. The explanation of each issue should identify:
 - 1) The significance criteria or threshold, if any, used to evaluate each question; and
 - 2) The mitigation measure identified, if any, to reduce the impact to a less than significant level.

14. ISSUE AREAS:

MITIGATION MONITORING

As discussed in this section of the Initial Study, a substantial number of mitigation measures would have to be implemented as identified to ensure that all potentially significant environmental effects posed by the project would be reduced to less than significant levels. Due to the number and complexity of these mitigation measures, the City will require the permittee to fund a Mitigation Monitoring and Compliance Program (MCP) as described below:

1. Preparation and implementation of a mitigation measure Monitoring and Compliance Program (MCP) shall be funded by the permittee. The MCP preparer and contractor shall be selected by the City of Goleta. These individuals shall be under contract and responsible to the City of Goleta. **Plan Requirements and Timing:** The required MCP shall, at minimum, include the following elements:
 - a) All mitigation measures conditions imposed on this project and the impacts they are intended to mitigate, including the geographic location of such on the project site.
 - b) A plan for monitoring, coordination, and implementation of all mitigation measures, the plans, and programs required therein. The plan shall include a description of all measures that will be implemented to assure compliance, including pre-construction and construction requirements, field monitoring, data collection, management and coordination of all field personnel and feedback to field personnel and affected agencies. MCP Contractor feedback responsibilities include weekly, monthly and/or as specified in the MCP reports to be prepared throughout project construction. These shall include status of development, status of mitigation, incidents of non-compliance and their resulting effects on sensitive environmental resources, and any other relevant or requested data. A final report summarizing project compliance and/or data shall be submitted to the City within 30-days of construction completion.

The MCP contractor shall appoint at least one (1) Onsite Monitor (OM) responsible for overall monitoring, but shall employ as many qualified specialists as necessary (as determined by the City of Goleta) to oversee specific conditions (e.g., archaeologists, biologists, California licensed surveyors, etc). The OM shall have the authority to ensure compliance with all project mitigation measures at all times during construction and to stop work in an emergency and/or in the event that project construction results in any violation of said mitigation measures. The MCP shall also provide for any appropriate procedures not specified in the mitigation measures to be carried out if they are necessary to ensure compliance.

Monitoring: Planning and Environmental Services shall oversee the MCP. In addition to funding the MCP, the permittee shall pay all Permit Compliance fees for MCP implementation prior to final inspection. The decision of the Director shall be final in the event of any dispute.

AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Have a substantial adverse effect on a scenic vista?				■	
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?		■			
c. Substantially degrade the existing visual character or quality of the site and its surroundings?		■			
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		■			

Existing Setting

The project site has been used as an automobile recycling facility and although most of the wrecked cars have been removed from the site, a number of cars remain and that use has not been formally abandoned. In the northeast corner of the subject property and away from the site of the recycling facility, three buildings totaling 10,741 square feet exist that are used as a single-family residence, a towing service office, a construction business office and storage area, and an auto repair facility. The subject property is bounded on the west by San Jose Creek and a dense stand of riparian vegetation that blocks views of the property from the adjoining streets and the Santa Barbara Airport as well as another automobile recycling facility and industrial area off Placencia and Corta Streets. To the north of the property and across South Kellogg Avenue is another auto salvage/commercial area where auto and auto-body repair is done as well as contractor storage. To the east of the subject property is the drive-in theater/swap meet site but views from this property to the west across the subject site are completely blocked by an intervening, eight-foot high wooden fence. To the south of the subject parcel is private property owned by the Gas Company. Pursuant to the Visual and Historic Resources Element of the City's General Plan/Coastal Land Use Plan (GP/CLUP), there are no important view corridors, vantage points, or scenic resources in the vicinity of the subject parcel (Figure 6-1, Visual and Historic Resources Element, City of Goleta GP/CLUP).

Thresholds of Significance

A significant aesthetic impact would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additionally, the City's *Environmental Thresholds and Guidelines Manual* instructs the project evaluator to assess visual/aesthetic impacts through a two step process. First, the visual resources of the project site must be evaluated including the physical attributes of the site, its visual uniqueness, and its relative visibility from public viewing areas. Of particular concern are visibility from coastal and mountain areas, as well as its visibility from the urban fringe and travel corridors. Secondly, the potential impact of the project on visual resources

located onsite and on views in the project vicinity which may be partially or wholly obstructed must be determined. This step includes an evaluation of the project's consistency with City and State policies on the protection of visual resources.

Project Specific Impacts

- a) As noted above, there are no existing scenic vistas or important public vantage points in the vicinity of the project site that could be affected by the recycling facility, especially given its low elevation and blockage of any views toward the coastline by the remains of Mescalitan Island. The facility would have no impact on views to the north of the Santa Ynez Mountains from any public view point, including Highway 217 due to the existing dense riparian vegetation along Old San Jose Creek and the existing drive-in theater/swap meet property. Therefore, impacts on scenic resources would not occur as a result of project implementation.
- b) Views of the recycling facility site from State Route 217 are blocked by the drive-in theater/swap meet property and existing development in the northeast corner of the subject property. The project site is virtually flat and the facility would maintain a buffer from the edge of riparian vegetation/top-of-bank of Old San Jose Creek (please refer to the discussion of Biological Resources below). Therefore, no existing trees or native vegetation would be removed to facilitate project implementation. In addition, new landscaping would be installed along portions of the northern property boundary to screen the facility as well as additional trees along the eastern property boundary to augment the existing tree line that adds screening between the drive-in theater/swap meet property and the subject property. None of the three existing structures of varying age onsite in the northeast corner of the subject property would be affected by the project. However, public views onto the site, including views of Old San Jose Creek and its riparian corridor, are available from Placencia Street. As the raised operational pad would require erection of a retaining wall ranging in height from four to six feet at the edge of the riparian buffer, that wall would be visible from the public vantage point to the west on Placencia Street. Such a wall if not designed appropriately could pose a potentially significant aesthetic/visual impact on public views into the site from Placencia Street, as well as associated views of the creek corridor. Such impacts would be considered potentially significant.
- c) The entirety of the portion of the subject property that comprises the project site has been used as an auto wrecking/salvage yard and although most of those cars have been removed, the auto salvage use has not been formally abandoned. Project implementation would result in the removal of the remaining cars and conversion of the site to a recycling facility where recycled concrete and asphalt/aggregate concrete would be produced and stored for sale to contractors and other parties primarily for use as Class 2 road base. While the character of the site would change significantly, the conversion from an auto wrecking/salvage yard to a recycling facility would not adversely affect the visual character of the property. As the property is, and would continue to be, well screened by the existing vegetation and drive-in theater/swap meet fence, its conversion from a wrecking yard to recycling facility would have no adverse affect on the visual character of the surrounding area.

The application includes a request for a modification to the landscape/screening requirements of the Coastal Zoning Ordinance's M-S-GOL zone district (Sections 35-84A.12(3) and 35-84A.12(5), Article II, Chapter 35 of the Municipal Code) to allow for the installation of a six (6) foot high chainlink fence with baffles or similar screening material at the front property line along South Kellogg Avenue/Technology Drive instead of providing a 10-foot landscaped strip in front of any fencing for screening purposes. The basis for this request is to provide for enhanced security along the northern property line of the project site as well as protect against trash blowing onto the property from offsite. The requested modification to this landscape/screening standard could pose a significant visual impact depending on the context and visual character of the area of the project site. However, in this instance the surrounding area is developed with relatively intense commercial and industrial uses, none of which provide for such front setback landscaping and only minimal treatment of property line fencing. Furthermore, any intervening landscaping between the front property line and any fence-line would have to be removed upon notice from the City since such landscaping would be located within the existing 17-foot wide public road easement that will be used by the City for construction of the Fowler Road extension. Therefore, while the visual buffering intended by these zoning standards would not be provided for this project, given the existing visual character of the surrounding area and the City's ability to ensure an appropriate fence design through the DRB review process would justify such a request in this instance.

Finally, unscreened utility connections and/or roof mounted HAVC equipment could pose an adverse visual effect on the visual quality of the site and overall project. Such impacts are considered potentially significant.

- d) While no night-lighting of the operational area is included in this application since all crushing and material sales would occur during daylight hours, both the sales-office building and garage would require at least minimal security and safety lighting. If not carefully designed, such lighting, especially for the garage which is in close proximity to Old San Jose Creek, could result in the creation of a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Such impacts would be considered potentially significant.

Cumulative Impacts

The project's contribution to cumulative night-lighting impacts as well as impacts on the visual character of the project site and surrounding area would be considered potentially significant. Project contributions to all other visual/aesthetic impacts discussed above would be considered less than significant.

Required Mitigation Measures

1. The permittee shall receive Preliminary and Final approval from the Design Review Board (DRB). **Plan Requirements and Timing:** The review shall include site plan, floor plan, elevations, grading plan, landscape plan, plan for the retaining wall around the raised operational pad, permanent fencing/guardrails along the westerly edge of the operational pad for safety purposes, property line

fencing, and lighting plan consistent with the DRB submittal requirements. Special attention shall be taken with the design and treatment of the front property line fencing to ensure that any screening elements incorporated into said fencing enhance the visual character of the site to the maximum extent feasible. Additional materials shall be provided as required by the DRB to complete their review. Preliminary and Final approval shall be granted prior to Land Use Permit (LUP) issuance.

Monitoring: City staff shall verify compliance prior to approval of any LUP for the project, during field inspection, and prior to final inspection.

2. The permittee shall submit a composite utility plan for City staff and DRB Preliminary/Final review. All external mechanical equipment (including HVAC condensers, switch boxes, etc.) shall be included on all building plans and shall be designed to be integrated into the structure and/or screened in their entirety from public view. **Plan Requirements and Timing:** Detailed plans showing all external/roof mounted mechanical equipment shall be submitted for review by City staff and the DRB prior to LUP issuance.

Monitoring: Prior to final inspection, City staff shall verify installation of all external/roof mounted mechanical equipment per the approved plans.

3. All new utility service connections and above-ground mounted equipment such as backflow devices, etc, shall be shall be screened from public view and/or painted in a soft earth-tone color(s) (red is prohibited) so as to blend in with the project. Screening may include a combination of landscaping and/or fencing/walls. Whenever possible, utility transformers shall be placed in underground vaults. All gas and electrical meters shall be concealed and/or painted to match the building. All gas, electrical, backflow prevention devices and communications equipment shall be completely concealed in an enclosed portion of the building, on top of the building, or within a screened utility area. All transformers and vaults that must be located within the right-of-way shall be installed below grade unless otherwise approved by the City, and then must be completely screened from view. **Plan Requirements and Timing:** The plans shall identify the type, location, size, and number of utility connections and above-ground mounted equipment, as well as how such equipment would be screened from public view and the color(s) that it would be painted so as to blend in with the project and surrounding area. Plans shall be submitted for review by City staff and the DRB prior to LUP issuance.

Monitoring: Prior to final inspection, City staff shall verify that all above-ground utility connections and equipment is installed, screened, and painted per the approved plans.

4. All exterior night lighting for either the sales-office or equipment garage shall be of low intensity, low glare design, and shall be hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent properties. ***No other lighting of any operational area onsite shall be allowed as an element of this project.*** Upward directed exterior lighting is prohibited. The permittee shall develop a lighting plan incorporating these requirements. **Plan Requirements**

and Timing: The locations of all exterior lighting fixtures and complete cut-sheets of all exterior lighting fixtures shall be reviewed and approved by the DRB and City staff prior to LUP issuance.

Monitoring: Prior to final inspection, City staff shall inspect to ensure that exterior lighting fixtures have been installed consistent with approved plans.

5. Trash/recycling enclosure(s) shall be provided. **Plan Requirements and Timing:** The enclosure shall be of adequate size for trash and recycling containers (at least 50 square-feet), and shall be accessible by users and for removal. The trash/recycling area shall be enclosed with a solid wall of sufficient height to screen the area, shall include a solid gate and a roof, and shall be maintained in good repair in perpetuity. The enclosure(s) shall be shown on project plans and shall be reviewed and approved by City staff and the DRB prior to LUP issuance.

Monitoring: Prior to final inspection, City staff shall site inspect to ensure installation according to the approved plan.

6. Project landscaping shall consist of approximately seventy-five percent (75%) drought-tolerant native and/or Mediterranean type species which adequately complement the project design and integrate the site with surrounding land uses. **Plan Requirements and Timing:** The final landscape plan shall identify the following:
 - a) Type of irrigation;
 - b) All existing and new trees, shrubs, and groundcovers by species;
 - c) Size of all plantings; and
 - d) Location of all plantings.

The final landscape plan shall be reviewed and approved by the DRB and City staff prior to LUP issuance.

Monitoring: Prior to final inspection, City staff shall site inspect to ensure that landscaping has been installed consistent with the final landscape plan.

7. The permittee shall enter into an agreement to install required landscaping and water-conserving irrigation systems as well as maintain required landscaping for the life of the project. **Plan Requirements and Timing:** The permittee shall sign the landscape installation and maintenance agreement, including at least a three (3) year maintenance period, prior to approval. Performance securities for installation and maintenance shall be reviewed and approved by City staff prior to LUP issuance.

Monitoring: Prior to final inspection, City staff site inspect to ensure installation according to approved plan. City staff shall check maintenance as needed. Release of any performance security requires appropriate documentation and City staff signature.

Residual Impacts

With implementation of these mitigation measures, project impacts involving the visual character of the project site and surrounding area, as well as impacts due to exterior lighting, including project contributions to cumulative visual impacts, would be considered less than significant.

AGRICULTURE AND FOREST RESOURCES

<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>	<p>Potentially Significant Impact</p>	<p>Less Than Significant With Mitigation Incorporated</p>	<p>Less Than Significant Impact</p>	<p>No Impact</p>	<p>See Prior Document</p>
<p>a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>				<p>■</p>	
<p>b. Conflict with existing zoning for agricultural use or a Williamson Act contract?</p>				<p>■</p>	
<p>c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use?</p>				<p>■</p>	
<p>d. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?</p>				<p>■</p>	
<p>e. Result in the loss of forest land or conversion of forest land to non-forest use?</p>				<p>■</p>	

Existing Setting

The subject property is developed with an array of commercial/industrial uses on its northeast corner with the remainder the property being used for an auto wrecking/salvage yard since 1983. The project site was vacant until 1928 when an irrigation reservoir, barn, and (lemon) orchards were developed (URS Corporation; *Limited Phase II Site Assessment, 903/905 South Kellogg Avenue*, dated June 30, 2010). Based on aerial photographs in County Planning & Development Department files taken between 1929 and 1950, it appears that the site remained in agricultural production during this time period. After 1961, the structures associated with the agricultural use were removed and the site was allowed to go fallow (URS Corporation; June 30, 2010). Soils onsite are Camarillo fine sandy loam with a soil capability unit designation of III_{w-2(19)} which is considered non-prime by the US Soil Conservation Service. Such soils are typically deep and poorly drained with a moderately permeable surface layer and slowly permeable underlying clay layer. Such soils have a rooting depth of up to 60 inches and require internal drainage for agricultural production. Truck crops and lemons are the most typical types of agricultural products grown on these soils.

Thresholds of Significance

A significant impact to agricultural resources would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additionally, a project may pose a significant environmental effect on agricultural resources if it conflicts with adopted environmental plans and goals of the City or converts prime agricultural land to non-agricultural use or impairs the agricultural productivity of prime agricultural land.

Project Specific Impacts

- a-c) Soils onsite are considered non-prime (Class III) and the project site is not designated by either the State, County of Santa Barbara, or the City as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (City of Goleta GP/CLUP EIR Figure 3.2.2). Therefore, the project would have no effect on such agricultural resources on the South Coast. The property is not under a Williamson Act contract nor would it qualify given its size, isolation from other agricultural properties, and non-prime soils onsite. There are no properties in agricultural production or planned for agricultural use in proximity to the project site for which future agricultural production would be compromised as a result of project implementation. Therefore, no such impacts on agricultural resources would occur as a result of the project.

- d,e) There is no property zoned as forest land per the definition Public Resources Code Section 12220(g)), timberland as defined by Public Resources Code Section 4526), or timberland zoned for timberland production (as defined by Government Code Section 51104(g)) within the City. The project would have no effect on any forest land or result in the conversion of any forest land to non-forest land use.

Cumulative Impacts

The project would not result in any contribution to cumulative impacts on agricultural or forest/timberland resources.

Required/Recommended Mitigation Measures

No mitigation is required or recommended.

Residual Impacts

None.

AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Conflict with or obstruct implementation of the applicable air quality plan?			■		
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			■		
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			■		
d. Expose sensitive receptors to substantial pollutant concentrations?			■		
e. Create objectionable odors affecting a substantial number of people?			■		

Existing Setting

The climate in and around, the City of Goleta, as well as most of Southern California, is controlled largely by the strength and position of the subtropical high-pressure cell over the Pacific Ocean. This high-pressure cell typically produces a Mediterranean climate with warm summers, mild winters, and moderate rainfall. This pattern is periodically interrupted by periods of extremely hot weather brought in by Santa Ana winds. Almost all precipitation occurs between November and April, although during these months, the weather is sunny or partly sunny a majority of the time. Cyclic land and sea breezes are the primary factors affecting the region's mild climate. The daytime winds are normally sea breezes, predominantly from the west, that flow at relatively low velocities. Additionally, cool, humid, marine air causes frequent fog and low clouds along the coast, generally during the night and morning hours in the late spring and early summer.

Surface temperature inversions (0 to 500 feet) are most frequent during the winter, and subsidence inversions (1,000 to 2,000 feet) are most frequent during the summer. Inversions are an increase in temperature with height and directly related to the stability of the atmosphere. Inversions act as a cap to the pollutants that are emitted below or within them. The subsidence inversion is very common during the summer along the California coast, and is one of the principal causes of air stagnation. Poor air quality is usually associated with air stagnation (high stability/restricted air movement).

The project is located in the South Central Coast Air Basin (SCCAB). The SCCAB encompasses San Luis Obispo, Santa Barbara, and Ventura Counties. The site is located in Santa Barbara County.

Ambient Air Quality Standards

The Federal Government and the State of California have established air quality standards and emergency episode criteria for various pollutants. Generally, State regulations have stricter standards than those at the Federal level. Air quality standards are set at concentrations that provide a sufficient margin of safety to protect public health and welfare. Air quality at a given location can be described by the concentration of various pollutants in the atmosphere. The significance of a pollutant concentration is determined by comparing the concentration to an appropriate Federal and/or State ambient air quality standard.

Federal standards are established by the US Environmental Protection Agency (EPA) and are termed the National Ambient Air Quality Standards (NAAQS). The State standards are established by the California Air Resources Board (ARB) and are called the California Ambient Air Quality Standards (CAAQS). The region generally has good air quality, as it attains or is considered in maintenance status for most ambient air quality standards. The Santa Barbara County Air Pollution Control District (APCD) is required to monitor air pollutant levels to assure that Federal and State air quality standards are being met.

Criteria Pollutants

The criteria pollutants of primary concern include ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter less than 10 microns in diameter (PM₁₀), and particulate matter less than 2.5 microns in diameter (PM_{2.5}). Also regulated are sulfates, lead, hydrogen sulfide (H₂S), and vinyl chloride.

Ozone air pollution is formed when nitrogen oxides (NO_x) and reactive organic compounds (ROCs) react in the presence of sunlight. According to the APCD, the major sources of ozone precursor emissions in Santa Barbara County are motor vehicles, the petroleum industry, and solvent usage (paints, consumer products, and certain industrial processes). Sources of PM₁₀ include grading, demolition, agricultural tilling, road dust, mineral quarries, and vehicle exhaust.

Air Quality Planning

State and Federal laws require that jurisdictions which do not meet clean air standards develop plans and programs that will bring those areas into compliance. These plans typically contain emission reduction measures and attainment schedules to meet specified deadlines. If and when attainment is reached, the attainment plan becomes a "maintenance plan."

In 2001, an attainment plan was developed that was designed to meet both Federal and State planning requirements. The Federal attainment plan was combined with those from other statewide non-attainment areas to become the State Implementation Plan (SIP). The 2001 Clean Air Plan (CAP) was adopted as the Santa Barbara County portion of the SIP, designed to meet and maintain Federal clean air standards. The adopted 2010 CAP incorporates updated data and is currently the most recent Clean Air Plan for ultimately meeting the State ozone standard.

As of 2008, Santa Barbara County is designated as a Federal ozone attainment area for the 8-hour ozone standard (the 1-hour Federal standard was revoked for Santa Barbara County). A new California 8-hour ozone standard was implemented in May 2006. This standard has been exceeded by air quality conditions in the County and the State standard for PM₁₀ continues to be exceeded. Santa Barbara County is therefore a non-attainment area for the State standards for ozone and PM₁₀. The County is in attainment for the Federal PM_{2.5} standard and unclassified for the State PM_{2.5} standard (based on monitored data from 2006 to 2008), as well as designated "in attainment" or "unclassified" for other State standards and for all Federal clean air standards.

Thresholds of Significance

A significant air quality impact could occur if the project resulted in any of the impacts noted in the above checklist (a-e). In addition, per the City's *Environmental Thresholds and Guidelines Manual*, a significant air quality impact could occur, if the project:

- f. Interferes with progress toward the attainment of the ozone standard by releasing emissions which equal or exceed the established long-term quantitative thresholds for NO_x (nitrogen oxides) and ROC (reactive organic compounds; same as reactive organic gases [ROG]). Thresholds are 25 lbs/day of either NO_x or ROC;
- g. Equals or exceeds the State or Federal ambient air quality standards for any criteria pollutant (as determined by modeling);
- h. Results in toxic or hazardous air pollutants in amounts which may increase cancer risks for the affected population.

APCD Thresholds

The following significance thresholds have been established by the Santa Barbara County APCD (*Scope and Content of Air Quality Sections in Environmental Documents*, SBCAPCD, 2010). While the City of Goleta has not yet adopted any new threshold criteria, these APCD thresholds are considered appropriate for use as a guideline for the impact analysis.

APCD Operational Impacts Thresholds: The project would result in a significant impact, either individually or cumulatively, if it would:

- 1) Emit 240 pounds/day or more of ROG (reactive organic gases; same as reactive organic compounds [ROC]) and NO_x from all sources;
- 2) Emit 25 lbs/day or more of unmitigated ROG from any motor vehicles trips only;
- 3) Emit 25 lbs/day or more of unmitigated NO_x from any motor vehicle trips only;
- 4) Emit 80 lbs/day or more of PM₁₀;

- 5) Cause or contribute to a violation of any California or Ambient Air Quality standard (except ozone);
- 6) Exceed the APCD health risk public notification thresholds adopted by the APCD Board (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than 1.0 for non-cancer risk); or
- 7) Be inconsistent with Federal or State air quality plans for Santa Barbara County.

The cumulative contribution of project emissions to regional levels should be compared with existing programs and plans, including the most recent Clean Air Plan (CAP; 2010). Due to the County's non-attainment status for ozone and the regional nature of ozone as a pollutant, if a project's emissions from traffic sources of either of the ozone precursors (NO_x or ROC), exceed the operational thresholds, then the project's cumulative impacts are considered significant. For projects that do not have significant ozone precursor emissions or localized pollutant impacts, if emissions have been taken into account in the 2010 CAP growth projections, regional cumulative impacts may be considered to be less than significant.

APCD Construction Impacts Thresholds: Quantitative thresholds of significance are not currently in place for short-term emissions. However, short-term impacts such as exhaust emissions from construction equipment and fugitive dust generation during grading must be discussed. In the interest of public disclosure, the APCD recommends that construction-related NO_x, ROC, PM₁₀, and PM_{2.5} emissions, from diesel and gasoline powered equipment, paving, and other activities be quantified. The APCD uses 25 tons per year for NO_x and ROC as a guideline for determining the significance of construction impacts.

Under APCD Rule 202 D.16 (www.sbcapcd.org/rules/download/rule202.pdf), if the combined emissions from all construction equipment used to construct a stationary source which requires an Authority to Construct permit, have the potential to exceed 25 tons of any pollutant, except carbon monoxide, in a 12-month period, the permittee shall provide offsets under the provisions of Rule 804 and shall demonstrate that no ambient air quality standard will be violated. APCD Rule 345 (www.sbcapcd.org/rules/download/rule345.pdf) regulates generation of visible fugitive dust emissions at demolition and construction sites.

Project Specific Impacts

The project would result in the construction of a 960 square-foot sales-office building, 1,840 square-foot equipment garage, and implementation of a concrete recycling/building material production facility that includes an approximately 20,000 square-foot raw material storage area, approximately 20,000 square-foot finished material storage area, and an approximately 18,400 square-foot operational area for the crusher and associated equipment on a 4.935 acre parcel. Recycling operations would involve a CEC 102 x 115 electrical powered portable impact crusher, a CEC 5 x 12 Road-Runner electric/hydraulic powered screening plant, and an electrical powered CEC Top Truss radial stacker or their electrically powered equivalent. Project grading for the facility would involve 12,000 cubic yards of fill material to elevate the property above the 100-year floodplain. Construction of the facility would result in short-term air quality

impacts while long-term air quality impacts associated with both operational and vehicular sources would also occur as a result of project implementation.

The City's methodology for quantifying criteria pollutant emissions relies upon the URBEMIS 2007 9.2.4 air quality modeling software for identifying short-term construction and long-term operational impacts for the pounds/day unmitigated condition. Actual estimates are based on a 2008 unmitigated condition.

Short-Term Construction Impacts:

- a,b) Short-term air quality impacts generally occur during project grading. Preliminary earthwork quantities are estimated at 12,000 cubic yards of fill to be imported to the site. As a result, construction grading generated PM_{10/2.5} dust for a project of this size is estimated to be 14.6 lbs/day. Construction related ROC and NO_x emissions are estimated at 61.6 lbs/day and 57.3 lbs/day respectively (please refer to Attachment 3, the URBEMIS daily summer emission summary for the project). Neither the City nor the APCD has adopted any significance thresholds for construction-generated ROC, NO_x, or PM₁₀. These emissions have been adequately incorporated into the 2010 CAP in terms of the overall emissions inventory for construction activities. Therefore, impacts are considered adverse, but less than significant.

- d,h) Fine particulate emissions from diesel equipment exhaust are classified as carcinogenic by the State of California. PM_{10/2.5} diesel exhaust emissions for construction equipment involved in project construction are preliminarily estimated at 6.6 lbs/day (please refer to Attachment 3). These short-term emissions would not constitute "substantial" concentrations of diesel particulate emissions and are considered adverse but less than significant.

- e) Construction of new parking areas onsite would require application of aggregate concrete (AC aka asphalt) that could create objectionable odors. Such odors would be temporary and localized. APCD Rule 329, a prohibitory rule governing the application of cutback and emulsified asphalt paving materials in the County, would apply to all project paving activities. Therefore, impacts related to objectionable odors affecting a substantial number of people are considered less than significant.

Long-term Operational Impacts:

- a,b,f,g) Using the screening table in the City's *Environmental Thresholds and Guidelines Manual*, operational, long-term air pollutant emissions for all criteria pollutants generated by the project would be well below City and APCD thresholds for a potentially significant impact. To quantitatively confirm the findings from the screening table, staff prepared a long-term pollutant emission analysis for the project using the URBEMIS 2007 9.2.4 air quality modeling software for the 2008 lbs/day unmitigated condition. Under that analysis long-term area source and operational emissions for the project are estimated at 8.5 lbs/day of NO_x and 2.4 lbs/day of ROCs. As the APCD's permitting requirements and the project description require all crushing equipment to be electrically powered, the actual manufacturing component of the project would not result in the onsite generation of any criteria air pollutant. Therefore, long-term operational project impacts on air quality as resulting from project emissions of ROCs and NO_x well as the

region's ability to meet air quality attainment goals would be considered less than significant.

As the facility would involve the crushing of concrete and asphalt/aggregate concrete spoil to produce road base and other building materials, the project is subject to APCD permitting requirements for stockpiled materials and would have the potential to generate, on a long-term operational basis, substantially more fugitive dust than would other heavy industrial/manufacturing uses. As part of the APCD's permitting process, APCD engineers calculated that long-term operational crushing and stockpiling operations would generate approximately 8.7 lbs/day of PM₁₀ (fugitive dust) emissions or 1.44 metric tons/year (please refer to Attachment 4, Air Pollution Emissions From APCD ATC Permit Application 13322). Although the County is in a non-attainment status for the State PM₁₀ standard, the City has no threshold for long-term PM₁₀ fugitive dust emissions and the project's estimated level of fugitive dust on a long-term basis is well below the APCD operational threshold of 80 lbs/day. Therefore, project impacts on attainment of APCD's 2010 CAP are considered adverse but less than significant. The project's contributions to exceedence of State PM₁₀ standard would be considered potentially significant

- d,e) The project would be located within an existing commercial/industrial area on South Kellogg Avenue. As the area is already developed for commercial and industrial use, and the project itself is of an industrial/manufacturing nature, air pollutants or odors from the recycling operation would be typical for areas with this type of development. Furthermore, as such air emissions would not be considered substantial, associated project impacts on sensitive receptors would be considered less than significant.

Cumulative Impacts

- c,f,g) Per the City's *Environmental Thresholds and Guidelines Manual*, a project's contribution to cumulative air quality impacts is considered significant if the project's total emissions of either NO_x or ROCs exceed the long term threshold of 25 lbs/day. The project's long-term contribution to NO_x and ROCs emissions would be far less than this threshold, and therefore the project's contribution to cumulative air quality impacts involving NO_x and ROCs would be considered less than significant. As the project's operational long-term estimated level of fugitive dust emissions is well below the APCD's operational threshold of 80 lbs/day, and the City has no long-term operational PM₁₀ threshold, long-term operational generation of fugitive dust is also considered an adverse, but less than significant contribution to cumulative fugitive dust impacts.

The project construction related contribution to cumulative NO_x, ROCs, and PM_{10/2.5} emissions would also be considered adverse but less than significant as these emissions are believed to have been adequately incorporated into the 2010 Clean Air Plan in terms of the overall emissions inventory for construction activities.

Recommended Mitigation Measures

1. Dust generated by construction and/or demolition activities shall be kept to a minimum. **Plan Requirements:** The following dust control measures shall be shown on all building and grading plans and the permittee shall ensure that these measures are implemented by the contractor/builder:
 - a) During clearing, grading, earth moving, excavation, and/or transportation of cut or fill materials, water trucks or sprinkler systems are to be used to prevent dust from leaving the site and to create a crust after each day's activities.
 - b) During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency shall occur whenever wind exceeds 15 miles per hour. If wind speeds increase to the point at which such measures cannot prevent dust from leaving the site, construction activities shall be suspended.
 - c) Minimize amount of disturbed area and reduce onsite vehicle speeds to 15 miles per hour or less.
 - d) Gravel pads, knock-off plates, or similar BMPs, shall be installed at all access points to the project site to prevent tracking of mud onto roadways.
 - e) Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting soil material to and from the site shall be tarped from the point of origin.
 - f) All gravel, dirt, and construction material shall be cleaned from the right-of-way at a minimum of once a day at the end of the work day.
 - g) After clearing, grading, earth moving, and/or excavation is complete, the disturbed area shall be treated by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed in a manner that prevents dust generation.

The permittee shall ensure that the contractor or builder designates a person or persons to monitor the dust control program and to order increased watering as necessary to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to City staff and the APCD and shall be posted in three locations along the project site's perimeter for the duration of grading and construction activities. **Timing:** All requirements shall be noted on all clearance plans and shall be reviewed and approved by City staff prior to LUP issuance. Requirements shall be adhered to throughout all grading and construction periods.

Monitoring: City staff shall ensure measures are printed on plans and shall periodically site inspect to ensure compliance. APCD inspectors will respond to nuisance complaints.

2. Dust generated by operational concrete and asphalt/aggregate concrete crushing and/or storage of either raw material or finished product shall be kept to a minimum with a goal of retaining dust on the site. **Plan Requirements:** The following dust control measures listed below shall be implemented by the permittee:
 - a) During crushing, stockpiling of raw material or finished product, or loading/unloading of either finished material or raw product, a APCD approved system of water trucks and sprinkler systems, including APCD approved dust suppression equipment for all components of the approved crushing system (e.g. CEC 102 x 115 electrical powered portable impact crusher, a CEC 5 x 12 Road-Runner electric/hydraulic powered screening plant, and an electrical powered CEC Top Truss radial stacker) or their electrically powered equivalent shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.
 - b) During daily operations of the facility, water trucks or sprinkler systems shall be used to keep all areas of equipment movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas in the later morning and after work is completed for the day and whenever wind exceeds 15 miles per hour. If wind speeds increase to the point when such measures cannot prevent dust from leaving the site, crushing activities shall be suspended.
 - c) Crushing, stockpiling, and loading/unloading operations shall be suspended when wind speeds exceed 20 mph, unless an APCD/City approved dust suppression system is in place and operational.
 - d) Gravel pads, rumble plates, or similar devices shall be installed at all access points to the project site to prevent tracking of mud onto City roadways. Onsite vehicle speeds shall not exceed 15 miles per hour.
 - e) Raw and finished material stockpiled onsite shall be kept moist, or treated with soil binders to prevent dust generation.

The dust suppression system noted above shall be reviewed and approved by the APCD and City staff prior to LUP issuance. The permittee shall designate a person or persons to monitor the dust control program and to order increased watering as necessary to prevent transport of dust off-site. Their duties shall include holiday and weekend periods when the facility is not operational. The name and telephone number of such persons shall be provided to City staff and the APCD and shall be posted in three locations along the project site's perimeter for the duration of grading and construction activities. **Timing:** All requirements shall be noted on all plans submitted for LUP issuance.

Monitoring: City staff shall verify compliance with these requirements prior to LUP issuance and shall contact the designated monitor and perform periodic site inspections to verify compliance with dust suppression requirements.

3. Grading and construction contracts must specify that contractors shall adhere to requirements that reduce emissions of ozone precursors and particulate emissions from diesel exhaust. **Plan Requirements:** The following shall apply:

- a) All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.
- b) Fleet owners of mobile construction equipment are subject to the California Air Resources Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13, California Code of Regulations, Chapter 9, Section 2449).
- c) All commercial diesel vehicles are subject to limitations on idling time (Title 13, California Code of Regulations, Chapter 9, Section 2485). Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five (5) minutes. Electric auxiliary power units should be used whenever possible.
- d) Diesel construction equipment meeting the CARB Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- e) Diesel powered equipment should be replaced by electric equipment whenever feasible.
- f) If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts, and diesel particulate filters as certified and/or verified by CARB or the Environmental Protection Agency (EPA).
- g) Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- h) All construction equipment shall be maintained in tune per the manufacturer's specifications.
- i) The engine size of construction equipment shall be the minimum practical size.
- j) The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- k) Construction worker trips should be minimized by requiring carpooling and by providing lunch onsite.

Timing: All requirements shall be noted on all clearance plans and shall be reviewed and approved by City staff prior to LUP issuance. Requirements shall be adhered to throughout all grading and construction periods.

Monitoring: City staff shall ensure measures are printed on plans and shall periodically site inspect to ensure compliance. APCD inspectors will respond to nuisance complaints.

4. If the construction site is graded and left undeveloped for over four weeks, the permittee shall employ the following methods immediately to inhibit dust generation:
 - a) Seeding and watering to revegetate graded areas; and/or
 - b) Spreading of soil binders; and/or

- c) Any other methods deemed appropriate by City staff.

Plan Requirements and Timing: These requirements shall be noted on all plans and shall be reviewed and approved by the City prior to LUP issuance.

Monitoring: City staff shall perform periodic site inspections to verify compliance.

- 5. Diesel fuel emissions shall be limited. **Plan Requirements:** The following limitations on diesel-fueled vehicles in excess of 10,000 pounds shall apply during all construction and subsequent operational activities:

- a) Diesel-fueled vehicles in excess of 10,000 pounds shall not idle in one location for more than five (5) minutes at a time.
- b) Diesel-fueled vehicles in excess of 10,000 pounds shall not use diesel-fueled auxiliary power units for more than five (5) minutes to power heater, air conditioner, or other ancillary equipment on any such vehicle.
- c) The permittee shall designate one or more locations as deemed appropriate, for the permanent posting of a notice(s) to all drivers of diesel-fueled vehicles in excess of 10,000 pounds of these limitations on vehicle idling in all areas of the property that may be frequented by such vehicles. Such signs will be maintained in their approved location(s) as long as diesel-fueled vehicles in excess of 10,000 pounds are being used.

Timing: All requirements shall be noted on all clearance plans and shall be reviewed and approved by City staff prior to LUP issuance. Requirements shall be adhered to throughout all grading and construction periods. The location and information provided on the sign(s) shall be reviewed and approved by City staff prior to LUP issuance.

Monitoring: City staff shall ensure measures are printed on plans and shall periodically site inspect to ensure compliance. APCD inspectors will respond to nuisance complaints.

- 6. Transport of all exported cut material from the project shall be tarped from the project site to the point of storage. **Plan Requirements and Timing:** This requirement shall be printed on all plans submitted for issuance of any LUP, building, or grading permit(s) for the project. The permittee shall designate one or more locations as deemed appropriate for the posting of a notice(s) to all drivers of vehicles transporting soils. Such signs will be maintained in their approved location(s) during project construction. The location and information provided on the sign(s) shall be reviewed and approved by City staff prior to LUP issuance.

Monitoring: City staff shall verify compliance during all construction activities.

- 7. During facility operations, the permittee shall ensure that the delivery of raw material to the facility and transport of finished material from the facility is done using delivery vehicles are tarped from their point of origin and that loads of

finished product are tarped and wetted down before leaving the facility to avoid the release of fugitive dust during transit. **Plan Requirements and Timing:** The permittee shall provide for a water station onsite to ensure that all loads of finished material leaving the facility are wetted down before leaving the property. Prior to issuance of a LUP for the project, the permittee shall submit signage samples and employee procedures to ensure that all loaded vehicles leaving the facility are properly tarped to prevent the release of dust during transport. In addition, all plans submitted for any LUP, building, or grading permit(s) shall identify the design and location for the water station that shall be used to wet-down all loads of finished material leaving the facility.

Monitoring: City staff shall verify compliance prior to LUP issuance and shall periodically conduct site visits to verify compliance in the field.

Residual Impacts

With implementation of these mitigation measures, both short and long term residual project specific, as well as project contributions to cumulative air quality impacts, would be considered less than significant.

BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			■		
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		■			
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		■			
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		■			
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		■			

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				■	

Existing Setting

The subject property has supported for the past 40 years various types of development including an auto wrecking/storage yard, a single-family residence, a towing service, construction business office and storage, and an auto repair facility. The majority of the project site is flat, consisting of bare ground and the remnants of an auto wrecking/storage yard that as of yet has not been formally abandoned. There is little to no native vegetation within the project site, with the exception of a 460 foot-long stretch of native riparian vegetation along the riparian corridor of Old San Jose Creek which forms the western boundary of the subject property (Dudek & Associates; *Biological Resource Assessment, Concrete Recycling Facility, 903, 905, 907, & 909 South Kellogg Avenue, Goleta, California*, dated July 14, 2010). An approximately 250-foot long east/west flowing unnamed drainage swale tributary to Old San Jose Creek abuts the project site on its northern property line that until recently supported scattered willow scrub patches. Within this area of Old Town, Old San Jose Creek is an urbanized ephemeral creek surrounded by residences and various types of commercial and industrial development. Dominant vegetation along Old San Jose Creek in the vicinity of the project site includes a mature canopy comprised of coast live oak (*Quercus agrifolia*), arroyo willow (*Salix lasiolepis*), black cottonwood (*Populus balsamifera* ssp. *trichocarpa*), and Fremont's cottonwood (*Populus fremontii*). Understory vegetation is comprised of both native and non-native species including bristly ox-tongue (*Picris echioides*), smilo grass (*Piptatherum miliaceum*), periwinkle (*Vinca major*), cape ivy (*Senecio mikanioides*), poison oak (*Toxicodendron diversilobum*), garden nasturtium (*Tropaeolum majus*), California blackberry (*Rubus ursinus*), umbrella sedge (*Cyperus involucratus*), castor bean (*Ricinus communis*), and cheeseweed (*Malva parviflora*).

Common wildlife species observed during field reconnaissance conducted by URS Corporation in November of 2009 included cabbage butterfly (*Pieris rapae rapae*), Baja California chorus frog (*Pseudacris hypochondriaca hypochondriaca*), and western fence lizard (*Sceloporus occidentalis*). Wildlife species observed by Dudek during the June 2010 field investigations include American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*), house finch (*Carpodacus mexicanus*), mourning dove (*Zenaida macroura*), and northern mockingbird (*Mimus polyglottos*). Other common wildlife species adapted to urban environments and expected to utilize the site for foraging and/or nesting/breeding include pocket gopher (*Thomomys* spp.), deer mouse (*Peromyscus maniculatus*), striped skunk (*Mephitis mephitis*), raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), coyote (*Canis latrans*), rabbit (*Sylvilagus* spp.), red-shouldered hawk (*Buteo jamaicensis*), alligator lizard (*Elgaria multicarinata webbiai*), and gopher snake (*Pituophis catenifer*) (Dudek; July 14, 2010). The diversity of native wildlife species detected on the project site is limited and includes those species that are more common and have adapted to urban settings.

Thresholds of Significance

A significant impact on Biological Resources would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additionally, per the City's *Environmental Thresholds & Guidelines Manual* a project would pose a significant environmental impact(s) on biological resources in any of the following would result from project implementation:

- a) A conflict with adopted environmental plans and goals of the community where it is located;
- b) Substantial effect on a rare or endangered plant or animal species;
- c) Substantial interference with the movement of any migratory or resident fish or wildlife species;
- d) Substantial diminishment of habitat for fish, wildlife, or plants.

Project Specific Impacts

a) *Special-Status Plant Species*

Based on a CNNDDB review performed by URS Corporation (2009), Coulter's saltbush (*Atriplex coulteri*), a CNPS List 1B.2 species, was previously recorded in the project vicinity. However, this species typically requires coastal bluff scrub, coastal dune, coastal scrub, and/or valley and foothill grassland habitats none of which were identified on site. Thus, this species is not expected to occur on the project site. Other special-status plant species that were documented in the project vicinity but are not expected to occur on site due to the lack of appropriate habitat and soil conditions include (Dudek; July 14, 2010):

- ✓ southern tarplant (*Centromadia parryi* ssp. *australis*);
- ✓ estuary seablite (*Suaeda esteroa*); and,
- ✓ Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*).

Special-Status Wildlife

No special-status wildlife species were detected on site during the 2009 URS Corporation and 2010 Dudek surveys. One CNDDDB occurrence of the monarch butterfly (*Danaus plexippus*) was recorded in the project vicinity, offsite and southeast of the project (URS Corporation; 2009). While the monarch butterfly may pass through the site in flight, this species is not expected to roost on site due to the lack of suitable overwintering habitat (i.e., eucalyptus trees). Other special-status wildlife species that were documented in vicinity of the subject property but are not expected to occur on the project site due to the lack of appropriate habitat include (i.e., salt marshes, sandy beaches, swamps, grasslands, and/or coastal dunes) include, Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), western snowy plover (*Charadrius alexandrinus nivosus*), light-footed clapper rail (*Rallus longirostris levipes*), California brackishwater snail (*Tryonia imitator*), and globose dune beetle (*Coelus globosus*) (URS Corporation; 2009) (Dudek; July 14, 2010).

San Jose Creek, located to the east of the subject property, is designated by the National Marine Fisheries Service (NMFS) as critical habitat for the southern

steelhead (*Oncorhynchus mykiss*) (NMFS; 2005). Although the segment of Old San Jose Creek bordering the subject property is hydrologically connected to San Jose Creek via a culvert, Old San Jose Creek is ephemeral in nature only flowing for a brief time immediately following a rain event. Therefore, in its current condition Old San Jose Creek does not provide suitable habitat for southern steelhead as there are no sustainable aquatic resources to support this species (Dudek & Associates; July 14, 2010).

Given the lack of any special status plant or animal species, and/or suitable habitat for such on the subject property, project impacts on special-status species would be considered less than significant.

- b,e) As noted above, the subject property is bordered on its western boundary by the riparian corridor of Old San Jose Creek, a City designated Environmentally Sensitive Habitat Area (ESHA). In addition, there is an east/west flowing drainage swale tributary to Old San Jose Creek that until the recent unpermitted removal of arroyo willows by a third party, was vegetated with native riparian vegetation that lies to the north of the northern property boundary of the parcel. Prior wetland delineation efforts at the confluence of this drainage swale and Old San Jose Creek indicate that this tributary to the creek also exhibits hydric soils (1987 US Army Corp of Engineer's Wetland Delineation Form prepared by La Claire of URS, dated 11/29/04 and on file with Planning and Environmental Services). These two ESHAs are, or have recently been, dominated by willow/cottonwood scrub and willow scrub which represent more than a 50% cover of the creek's and swale's riparian corridor. Therefore, the riparian corridor of Old San Jose Creek and the tributary drainage swale to the north of the northern property line would also meet the City and California Department of Fish & Game (CDF&G) definition of a riparian wetland.

Riparian corridors such as these are subject to a 100-foot Stream Protection Area buffer pursuant to GP/CLUP Policy CE 2.2. The project would maintain a minimum 25-foot buffer between raw and finished stockpile areas for both Old San Jose Creek and its tributary to the north of the northern property line. A discussion of the project's consistency with Policy CE 2.2 is in the Land Use and Planning section of this document. The following discussion focuses on the potential environmental effect on these two ESHAs with a 25-foot SPA/buffer versus a 100-foot SPA/buffer.

Old San Jose Creek is a north-to-south trending urban drainage originating in a mixed commercial use/residential development on Kellogg Way just south of Hollister Avenue, and flows to the south through Old Town before reaching its confluence with San Jose Creek, approximately 0.14 mile downstream of the subject property. The ability of Old San Jose Creek to provide a dispersal corridor for terrestrial wildlife and avifauna in this area is limited by numerous road crossings, chain link fences, and other man-made structures that restrict wildlife use, fragment habitat, and impede movement, including several road crossings at Kellogg Way, Pine Avenue, and an unnamed earthen access road, which bisects Old San Jose Creek opposite the project site on land owned by the City of Santa Barbara (Dudek; July 14, 2010). The stretch of Old San Jose Creek that borders the subject property on its western side is open and

vegetated with fair vertical stratification and biological diversity. However, the channel is disturbed by frequent transient habitation and other anthropogenic uses, as evidenced by trash deposition and multiple foot trails throughout the creek; these disturbances and human encroachment affect the integrity and quality of the biological resources, and their overall wildlife function (Dudek; July 14, 2010). While terrestrial wildlife and avian species may use that portion of the Old San Jose Creek drainage onsite for foraging and nesting purposes, regional wildlife movement is restricted by State Route 217 to the south and Pine Avenue to the north. Also, because Old San Jose Creek supports only ephemeral flow, it does not provide essential hydrologic resources for aquatic species in the area.

In addition to the degraded habitat conditions noted above, the project site has been used as an auto wrecking/storage yard where cars were stored up to and within the riparian corridor of the creek as well as in close proximity to the tributary drainage swale along the subject property's northern property line. Numerous car bodies remain along the western and northern property boundaries and the majority of the property in the vicinity of the creek bank is disturbed with parked vehicles used in the applicant's paving business and piles of rock, rubble and debris. Given these onsite characteristics, the function and value of the creek corridor for regional wildlife is considered compromised. Due to the fact that Old San Jose Creek and the unnamed tributary drainage to the north of the project site are urban drainages whose habitat function and value has been impaired by the nature of the drainages' hydrology, the biological constraints posed by their urbanized context, human encroachment in the creek corridor, and the fragmented nature of the creek channel, a more expansive SPA/buffer of 50 or 100 feet would not substantially reduce existing adverse edge effects over that achieved through implementation of a 25-foot wide buffer.

For instance, the intent of the SPA as defined in the GP/CLUP is to protect the biotic quality of the City's streams and riparian corridors from such adverse impacts at the development/corridor interface as exposure to polluted urban runoff, heightened sediment loading of surface flows, increase creek bank erosion, invasion of non-native plant species, and intrusion of urban uses, night lighting, and human activities into wildlife movement corridors. In this instance, implementation of a 25-foot wide buffer as part of the project would be sufficient to provide creek channel shading and protection of habitat for wildlife movement along Old San Jose Creek, result in the removal of all remaining wrecked cars from the subject property, provide adequate space to implement a native riparian revegetation/restoration effort with the removal of all non-native species from the existing riparian corridor, and expand the width of the existing corridor to reduce human intrusion into the habitat that could adversely affect wildlife use of the stream channel and associated habitat. The project involves no night lighting of any operation area and any security/safety lighting of structures would be located at least 75 feet away from the riparian corridor and restricted to a downward orientation and fully shielded to protect against excess light and glare.

Furthermore, through re-grading of the project site to protect the property from stream flooding and direct stormwater runoff to various water quality BMPs such as the "rain garden" detention basin along Old San Jose Creek, the 25-foot buffer would provide for a level of protection against the introduction of contaminated

stormwater runoff into the creek channel substantially equivalent to that which could be provided by a 100-foot buffer since it is the “rain garden” and filtered catch basins that provide for removal of urban pollutants and not overland release across a SPA of a specified width. Therefore, in this instance imposition of a SPA in excess of 25 feet would only marginally improve the riparian habitat and biotic quality of these two ESHAs beyond that realized through a 25-foot buffer while protection of water quality would not be measurably enhanced. Thus, implementation of a 25-foot SPA/buffer is considered appropriate under GP/CLUP Policy CE 2.2. Project impacts associated with the 25-foot buffer include the lighting and water quality issues identified above. These impacts are considered potentially significant pending final architectural and engineering plans that indicate appropriate treatment of lighting fixtures and project drainage.

It should be noted that the riparian corridor of Old San Jose Creek maintains a dominance of hydrophytic species (e.g. arroyo willow) that pursuant to the California Department of Fish and Game, California Coastal Commission, and City of Goleta, meet the one-parameter test for a protected wetland resource used by these agencies. However, given the fact that this vegetation is located within a well defined, incised stream channel, the City is applying the stream protection policies of its Conservation Element of the General Plan and not the wetland protection policies to such sensitive biological resources.

- c) Wetland delineations conducted for the City in 2004 and 2006 within the stream channel adjacent to the project site for the currently planned Fowler Road extension across Old San Jose Creek indicate that these riparian areas do not meet the US Army Corp of Engineer’s wetland criteria due to a lack of hydrology in all cases (Johanna LeClaire/Brooke McDonald, *Data Form, Routine Wetland Determination, 1987 COE Wetlands Delineation Manual*, dated September 29, 2004 and October 12, 2006). Therefore, the project would have no impact on federally protected wetlands as defined by Section 404 of the Clean Water Act.
- d) Some of the taller willows and coast live oaks on site provide avian nesting habitat and have potential to support nesting by smaller raptors such as Cooper’s hawks (*Accipiter cooperii*). Commencement of project construction and subsequently recycling operations could drive nesting bird species from their nests if such nesting have started prior to such site disturbance. Disturbance of existing nesting activities by small raptors and other avian species by project construction or operations would be considered a potentially significant impact.
- f) There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan for Old San Jose Creek. Therefore, no associated impacts on such plans would occur as a result of project implementation.

Cumulative Impacts

Possible project contributions to cumulative impacts on nesting by smaller raptors and other avian species would be considered potentially significant.

Required Mitigation Measures

1. All remaining autos and/or other equipment, materials, or refuse within 25 feet of either the top-of-bank or edge of riparian vegetation as depicted in Figure 1 of the *Biological Resource Assessment, Concrete Recycling Facility, 903, 905, 907, & 909 South Kellogg Avenue, Goleta, California* prepared by Dudek & Associates and dated July 14, 2010 shall be removed from the site and deposited with the appropriate landfill or salvage receptor. **Plan Requirements and Timing:** This requirement shall be met prior to LUP issuance.

2. All grading, construction activities, and structural development shall occur outside of a 25-foot SPA/riparian buffer measured from the top-of-bank or edge of riparian vegetation, whichever is greater, pursuant to Figure 1 of the *Biological Resource Assessment, Concrete Recycling Facility, 903, 905, 907, & 909 South Kellogg Avenue, Goleta, California* prepared by Dudek and dated July 14, 2010. The edge of the 25-foot buffer shall be identified on the approved project plans submitted for approval of any LUP for the project. Once all wrecked cars and other materials noted in the mitigation measure above are removed from the riparian corridor/25-foot buffer, under no circumstances shall any mechanized equipment be allowed inside the buffer. **Plan Requirements and Timing:** The retaining wall to be constructed along the 25-foot SPA/riparian buffer to retain the raised operation pad shall be graphically depicted on all project plans submitted for approval of any LUP for the project or issuance of any building or grading permit. Construction of the wall shall precede completion of the raised operational pad. Upon completion of the raised pad and retaining wall, permanent fencing as approved by the DRB shall be installed on top of the wall along with DRB approved signage installed every 50 feet advising employees and customers of the facility of the riparian buffer and the prohibition against any site disturbing activities within the buffer, with exception for habitat restoration and maintenance activities. Prior to occupancy clearance, this fencing shall be installed per the approved plans and both the fencing and signage shall be maintained for the life of the project.

Monitoring: City staff shall review plans and confirm fence installation prior to completion of the raised operational pad. City staff shall verify installation of the DRB approved permanent SPA buffer signage prior to occupancy clearance.

3. Any unanticipated damage to native trees or the riparian corridor/25-foot buffer of Old San Jose Creek or the tributary swale to the north of the northern property line of the project site during construction activities shall be mitigated in a manner approved by City staff. This mitigation shall include but is not limited to posting of a performance security, native tree replacement on a 10:1 ratio, and hiring of an outside consulting biologist to assess damage and recommend mitigation. **Plan Requirements and Timing:** This condition shall be printed on project plans submitted for LUP issuance. The required mitigation shall be done under the direction of the City-approved biologist prior to any further work occurring on site. Any performance securities required for installation and maintenance of replacement trees will be released by City staff after its inspection and approval of such installation and maintenance.

Monitoring: City staff shall review plans and confirm fence installation prior to grading/building permit issuance. City staff shall conduct site inspections to ensure compliance during all grading and construction activities.

4. A riparian corridor restoration plan shall be prepared for the Old San Jose Creek ESHA and SPA within the project boundary. The plan shall also include the drainage swale to be constructed onsite just south of the northern property boundary. The plan shall be prepared by a City-approved biologist and shall include specific goals for habitat restoration. **Plan Requirements:** Elements of the plan shall include, but not be limited to, the following:
- a) Author, date, project description, and project implementation.
 - b) A description of existing biological resources.
 - c) Goals and objectives for the restoration plan.
 - d) Site preparation methods and measures for protection of resources during construction.
 - e) Weeding requirements and a list of non-native species to be removed and methods for removal.
 - f) A planting plan for the riparian corridor and swale area with appropriate treatment of ESHA and SPA locations.
 - g) Use of only local genetic stock for all seeds and plantings and seed collection schedule.
 - h) Performance criteria by which restoration success is measured.
 - i) Methods to protect plantings until established, including short-term and long-term maintenance.
 - j) Actions necessary in the event performance criteria are not met.
 - k) Irrigation requirements.
 - l) Detailed mapping of ESHA and SPA boundaries and illustration of restoration areas.
 - m) Cost estimate to implement the restoration plan, including installation as well as maintenance and monitoring requirements.

Timing: The plan shall be reviewed and approved by City staff prior to issuance of an LUP. Implementation shall be completed prior to occupancy clearance.

Monitoring: City staff shall site inspect during installation and shall ensure completion prior to issuance of occupancy clearance.

5. The permittee shall provide performance securities and enter into agreements for installation and maintenance of the riparian corridor restoration plan. The maintenance period shall be a minimum of five (5) years. **Plan Requirements and Timing:** The performance securities shall be provided and agreements signed, prior to LUP issuance.

Monitoring: Prior to occupancy clearance, City staff shall site inspect to ensure installation according to the riparian corridor restoration plan. City staff shall check maintenance as needed. Release of any performance security requires appropriate documentation and City staff signature.

6. Commencement of project grading and construction shall be limited to the period between September 1st and February 1st to avoid the raptor/avian nesting season, unless a preconstruction survey, conducted by a City approved biologist, determines that no avian nesting activity is taking place within 300 feet of the project site and no raptor nesting is taking place within 500 feet of the project site. **Plan Requirements and Timing:** A pre-construction bird survey, prepared by the project biologist or other, City-approved biologist, shall be conducted two (2) weeks prior to commencement of construction activities to identify any active nests. Construction activities within 300 feet of an active passerine nest or 500 feet from any active raptor nest shall be delayed until the birds have fledged or further evaluation by the project biologist or City-approved biologist determines that such prohibitions are no longer necessary to prevent construction related disturbance to nesting activities.

Monitoring: The permittee shall provide the name and qualifications of the biologist to be used for avian survey purposes for City approval. City staff shall verify compliance prior to commencement of construction as well as during all construction activities.

7. All construction staging and stockpiling shall be limited to the area outside of the fenced 25-foot SPA/buffer at all times. Absolutely no staging and/or stockpiling of any materials shall be allowed within the SPA of Old San Jose Creek and/or the tributary drainage swale to the north of the northern property line. The perimeter of the approved stockpile areas in proximity to any ESHA onsite or in close proximity shall be established through installation of City-approved concrete gravity walls. **Plan Requirements and Timing:** These requirements and prohibitions shall be included on all plans submitted for LUP issuance.

Monitoring: City staff shall verify compliance prior to LUP issuance for the project and conduct periodic site inspections to verify compliance in the field.

8. During construction, washing of concrete, paint and equipment shall be restricted to a designated area(s) where polluted water and materials can be contained for removal from the site. **Plan Requirements and Timing:** The designated wash-out area(s) shall be noted on all plans, grading, or building permit and shall be reviewed and approved by City staff prior to LUP issuance.

Monitoring: City staff shall verify compliance prior to LUP issuance, grading, or building permit for the project and shall verify compliance in the field during all construction activities.

9. The permittee shall obtain all applicable California Department of Fish & Game (CDF&G) permits or a project waiver for installation of all drainage control improvements and riparian restoration/enhancement plantings within the riparian corridor of Old San Jose Creek. **Plan Requirements and Timing:** Such permits or waiver shall be submitted to the City prior to the issuance of any LUP for the project.

Monitoring: City staff shall verify compliance prior to issuance of any LUP for the project.

10. The permittee shall obtain a permit for the discharge of fill in federally protected waters pursuant to Section 404 of the Clean Water Act from the U. S. Army Corps of Engineers for all work and/or site disturbance within the riparian corridor of San Jose Creek, or a written waiver from the Corp from such permitting requirements. **Plan Requirements and Timing:** A Section 404 permit or written waiver from the U. S. Army Corps of Engineers for all proposed work/site disturbance within the riparian corridor of San Jose Creek shall be submitted to the City prior to the LUP issuance.

Monitoring: City staff shall verify compliance prior to LUP issuance.

Mitigation for potential project generated lighting and glare is identified under Mitigation Measure #6 in the Aesthetics discussion of this document. Mitigation for potential project water quality impacts are identified in Mitigation Measures #1-#7 in the Hydrology and Water Quality discussion of this document.

Residual Impacts

With implementation of these mitigation measures, residual project specific impacts on biological resources, as well as project contributions to cumulative impacts on biological resources, would be considered less than significant.

CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?				■	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			■		
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				■	
d. Disturb any human remains, including those interred outside of formal cemeteries?			■		

Existing Setting

The project site is located within historic boundaries of the Goleta Slough. Research and analysis of the estuary’s geomorphology, sedimentation processes, and descriptions of the Slough by late 18th Century Spanish chroniclers conclude that the Slough extended up to 10 feet above sea level at high tide, allowing for the passage of boats through from the ocean in and around Mescalitan Island, immediately to the southwest of the project site (Dudek; *Archaeological Resources Assessment, Concrete Recycling Facility, 903, 905, 907, & 909 South Kellogg Avenue, City of Goleta, California*, dated June 18, 2010). In addition, early 20th Century accounts of the area indicate that the area between Mescalitan Island and the present location of the Fairview/Hollister

intersection were subject to tidal inundation and navigable (Dudek; June 18, 2010). Over 10,000 years ago, climactic warming associated with the Holocene period (end of the Pleistocene Ice Age) resulted in a sea level rise of several meters (over 6 feet) that inundated the Goleta Slough to its historic extent. During the massive flooding that occurred in 1860-1861, floodwaters are estimated to have deposited up ten (10) feet of sediment in the Slough (Dudek & Associates; June 18, 2010). Further evidence that the project site was submerged until at least 1860 was provided by soil samples taken during a Phase II Environmental Assessment conducted in May of 2010. Specifically, soil samples taken at a depth of nine (9) feet below existing grade at the project site encountered a lens of silt with trace fine sand and trace organic material. The soil lens was black in color with strong organic odor. Based on such field observations, it appears that this lens, less than one (1) foot thick, is evidence of marsh or wetland overbank deposits that previously existed in this area (URS Corporation; *Limited Phase II Site Assessment, 903/905 South Kellogg Avenue, Goleta, California*, dated July 1, 2010). The interpretation as to the presence of overbank deposits is due to non-organic soil encountered below this lens indicating an intermittent inundation onsite historically (URS Corporation; July 1, 2010). Therefore, as the project site is below the margins of the ancestral Goleta Slough, it is not likely that the location was suitable for habitation once sea levels started rising over 10,000 years ago. As such, if any potential paleoenvironmental ground surfaces are located within the aerial extent of the project site, they would be deeply buried, if present at all (Dudek; June 18, 2010).

Thresholds of Significance

A significant impact on cultural resources would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additional thresholds are contained in the City's *Environmental Thresholds & Guidelines Manual*. The City's adopted thresholds indicate that a project would result in a significant impact on a cultural resource if it results in the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of such a resource would be materially impaired.

Project Specific Impacts

- a,c) The portion of the property where the recycling facility would be located has been most recently used as an auto wrecking/salvage yard and no historic structures or unique paleontological resources or site or unique geologic features are located onsite. Impacts on such resources would therefore not occur as a result of project implementation.

- b,d) The project includes import of 12,000 cubic yards of fill soils to improve the drainage flow onsite and direct it to a "rain garden" catch basin and swale along the northern property line. No scarification of the existing ground surface would occur as a result of project implementation and based on the results of a Phase II Environmental Assessment conducted in May of 2010 on the project site and it does not appear that excavations for remediation of hazardous materials would be required.

A review of previous archaeological investigations conducted within and adjacent to the project site indicates that the entirety of the subject property has been

systematically surveyed (Applied Earthworks; 2000, Wilcoxon, Erlandson, and Stone; 1982, SAIC; 1996a and 1996b, and URS Corporation; 2009). No prehistoric or historic archaeological sites have been recorded within the subject property. As explained above, the project site is located within a portion of the former Goleta Slough that was subject to tidal inundation. As such, there is very little likelihood that prehistoric habitation occurred within the project site and the estuarine environment, as settlements were found at higher elevations along the Slough margin, such as CA-SBA-60 to the north (Dudek; June 18, 2010). While the potential for deeply buried cultural resources from prehistoric occupation of the site along the Goleta Slough boundary over 10,000 years ago is theoretically possible, it is not likely, as the project site is not located topographically above the edge of the ancestral estuary, unlike other recorded archaeological sites in the general vicinity.

Therefore, given these facts, the project design that would involve importation of 12,000 cubic yards of fill to raise the site and create a drainage pattern that would flow to the north/northeast toward new stormwater facilities, and the fact that given the results of a recent Phase II Environmental Assessment of the property that excavation for remediation of contaminated soils is unlikely, potential project impacts on possible unknown archaeological resources and/or human remains interred outside of formal cemeteries onsite is considered less than significant.

Cumulative Impacts

As project specific impacts on archaeological/cultural resources are considered less than significant, project contributions to cumulative archaeological/cultural resource impacts would also be considered less than significant.

Required/Recommended Mitigation Measures

No mitigation is recommended or required.

Residual Impacts

None.

GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			■		
ii. Strong seismic ground shaking?			■		
iii. Seismic-related ground failure, including liquefaction?		■			
iv. Landslides?				■	
b. Result in substantial soil erosion or the loss of topsoil?		■			
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?		■			
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			■		
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				■	

Existing Setting

Topography within the project site is nearly level, gently trending toward the west and Old San Jose Creek at between 8 and 10 feet above sea level. Soils within the project site are mapped as Camarillo fine sandy loam, 0 to 2% slopes. The project site is located within the historic boundaries of the Goleta Slough and bordered on its west by the Old San Jose Creek channel. Along the northern property line is a drainage swale that is tributary to Old San Jose Creek. The closest mapped earthquake fault to the project site is the Moore Ranch Fault that lies over 1,200 feet to the south. Groundwater onsite was encountered at a depth of between six (6) and seven (7) feet below grade (URS Corporation; July 1, 2010).

Thresholds of Significance

A significant impact on geology/soils would be expected to occur if the project resulted in any of the impacts noted in the above checklist. The City's *Environmental Thresholds and Guidelines Manual* assumes that a project would result in a potentially significant impact on geological processes if the project, and/or implementation of required mitigation measures, could result in increased erosion, landslides, soil creep, mudslides, and/or unstable slopes. In addition, impacts are considered significant if the project would expose people and/or structures to major geological hazards such as earthquakes, seismic related ground failure, or expansive soils capable of creating a significant risk to life and property.

Project Specific Impacts

- a,c) As noted above, the project site is almost a quarter-mile north of the nearest earthquake fault line, the More Ranch Fault. This fault is not considered active by the State Department of Mines and Geology or subject to an Alquist-Priolo Special Studies Zone. The More Ranch Fault is however considered active based on the existence of a geologically recent fault scarp (City of Goleta GP/CLUP, Safety Element, 2006). Severe ground shaking and possible surface rupture during earthquakes is a hazard endemic to most of California, and all project construction would be subject to compliance with the seismic safety standards of the California Building Code Zone 4 which has been adopted by the City in Title 15 of the Goleta Municipal Code.

As groundwater onsite is relatively shallow (6-7 feet below existing grade) and the soils are considered younger alluvial in nature, the project site poses a potentially serious seismic settlement/liquefaction hazard for any structural development. As the project includes the construction of a one-story, 960 square-foot sales-office and 1,840 square-foot equipment garage, such hazards would be considered potentially significant.

Finally, as the project site is virtually flat, the development does not pose any risk associated with landslides.

- b) The project plan involves the importation of 12,000 cubic yards of fill to raise the project site by as much as four (4) feet at the southerly extent of the operational area so that it gently slopes to the north. This fill area would be contained along its western side by a retaining wall ranging from four to six feet in height, depending on existing grade. The operational area on the raised pad would be surrounded by concrete gravity walls to prevent the spread of raw or finished material out of the operational areas and onto either the internal access road or into sensitive ESHAs. Use of a retaining wall system and concrete gravity walls around the operational areas would prevent erosion of the raised pad on its high side and/or reduce introduction of sediments into stormwater runoff. However, wind and water could still result in the loss of sediment from the material stockpiles as well as the tracking of sediment onto City roadways by vehicles delivering and transporting raw product and finished product. To address such concerns a preliminary erosion control plan using best management practices for construction activities and temporary construction erosion control measures has

been prepared by the applicant and incorporated into the grading plan for the project. Long term erosion control measures would include a catch basin in the operational area that would convey runoff to a 2' deep x 6' wide x 250' long "rain garden" that would retain stormwater runoff for metered release into Old San Jose Creek. In addition, a 270' long 2' x 6" gravel-lined asphalt V-swale and associated curb along the southern extent of the 17' City easement off the northern property boundary would capture runoff and provide for filtration before discharging that runoff through a catch basin into the existing flow-line of South Kellogg Avenue which is the primary historic drainage pattern for the subject property. It should be noted that under the current grading/drainage plan, the applicant has made no provision for ensuring that runoff discharged from the "rain garden" detention basin is conveyed to the Old San Jose Creek channel in a non-erosive manner, nor has a design and/or location of that discharge line been identified. While potential wind erosion of the stockpile areas would be addressed under the Air Quality mitigation measures discussed above, erosion/sediment loss as a result of stormwater runoff could still occur if the drainage control facilities noted in the preliminary grading plan are not adequately sized or maintained, or discharge from the "rain garden" into Old San Jose Creek is not conducted in a non-erosive manner. Therefore, erosion/sediment loss from the project site would be considered a potentially significant impact.

- d) As noted above, soils onsite consist of Camarillo fine sandy loam which have a low shrink/swell potential (US Department of Agriculture, Soil Conservation Service; *Soil Survey of Santa Barbara County, California, South Coastal Part*, February, 1981). Given that such soils are considered to be of minimal expansive character, potential impacts posed on the project given the type of soil onsite are considered less than significant.
- e) Sanitary facilities for employees and guests are incorporated into both the 960 square-foot sales-office building at the entrance to the facility and the 1,840 square-foot equipment garage at the southern end of the operational area. Such facilities would be connected to the Goleta Sanitary District's sewer collection system. Therefore, the project would pose no impacts associated with the use of onsite septic systems.

Cumulative Impacts

As the project specific risks of erosion and liquefaction are considered potentially significant, project contributions to such cumulative geological hazards. All other project contributions to geological risks/hazards would be considered less than significant.

Required Mitigation Measures

1. The final grading and erosion control plan shall be designed to minimize erosion.
Plan Requirements: The plan shall include, but not be limited to, the following:
 - a) Best management practices (BMPs), such as temporary berms and sedimentation traps (such as silt fencing, straw bales, and sand bags), shall be installed in association with project grading. The BMPs shall be placed at

the base of all cut/fill slopes and soil stockpile areas where potential erosion may occur and shall be maintained to ensure effectiveness. The sedimentation basins and traps shall be cleaned periodically and the silt shall be removed and disposed of in a location approved by the City.

- b) Non-paved areas outside of any operational area and/or access roadway shall be revegetated or restored (i.e. geotextile binding fabrics) immediately after grading and installation of utilities, to minimize erosion and to re-establish soil structure and fertility. Revegetation shall include drought-resistant, fast-growing vegetation that would quickly stabilize exposed ground surfaces. Alternative materials rather than reseeding (e.g., gravel) may be used, subject to review and approval by Planning and Environmental Services and Community Services.
- c) Runoff shall not be directed across exposed slopes. All surface runoff shall be conveyed in accordance with the approved drainage plans.
- d) Energy dissipaters or similar devices shall be installed at the end of drainpipe outlets to minimize erosion during storm events. ***The final grading and erosion control plan shall provide a detailed design for the discharge conveyance improvements that would convey collected stormwater from the "rain garden" detention basin on the west side of the raised operational area to Old San Jose Creek in a non-erosive manner.***
- e) Grading shall occur during the dry season (April 15th to November 1st) unless a City approved erosion control plan is in place and all erosion control measures are in effect. Erosion control measures shall be identified on an erosion control plan and shall prevent runoff, erosion, siltation, and tracking of mud and soil onto City streets. All exposed graded surfaces shall be reseeded with ground cover vegetation to minimize erosion. Graded surfaces shall be reseeded within four (4) weeks of grading completion, with the exception of surfaces graded for the placement of structures. These surfaces shall be reseeded if construction of structures does not commence within four (4) weeks of grading completion.
- f) Site grading shall be completed such that permanent drainage away from foundations and slabs is provided and so that water shall not pond near structures or pavements.

Timing: Final grading, drainage, and erosion control plans shall be reviewed and approved by the City prior to LUP issuance. BMPs and erosion control measures shall remain in place/be implemented for the duration of grading and construction.

Monitoring: City staff shall verify compliance during grading and construction activities.

- 2. A soils report with structural recommendations to address potential liquefaction hazards shall be prepared and said recommendation incorporated into the design of the sales-office building and equipment garage. **Plan Requirements and Timing:** The required soils report shall be prepared by a licensed geotechnical engineer and the recommendations of the report incorporated into the design of the sales-office and equipment garage buildings. Said report shall be included with any plans submitted for a building permit for the project.

Monitoring: The Building and Safety Division shall review the submitted soils report and building plans to verify compliance. Building and Safety shall verify compliance in the field prior to the foundation inspection for any of the structures.

Residual Impacts

With implementation of these mitigation measures, project specific geological risks associated with erosion/sediment release offsite and liquefaction, as well as project contributions to such cumulative risks, would be considered less than significant.

GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			■		
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			■		

Existing Setting

The project site has been used as an automobile recycling facility and although most of the wrecked cars have been removed from the site, a number of cars remain and that use has not been formally abandoned. In the northeast corner of the subject property and away from the site of the recycling facility, three buildings totaling 10,741 square feet exist that are used as a single-family residence, a towing service office, a sand blasting operation, and an auto repair facility.

Background

Certain gases in the earth’s atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth’s surface temperature. Solar radiation enters the earth’s atmosphere from space. A portion of the radiation is absorbed by the earth’s surface, and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to their temperature. The earth has a much lower temperature than the sun; therefore, the earth emits lower frequency radiation. Most solar radiation is not absorbed by GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead “trapped,” resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth. Without the greenhouse effect, earth would not be able to support life as we know it.

Prominent GHGs contributing to the greenhouse effect are carbon dioxide CO₂, methane (CH₄), nitrous oxide (N₂O), hydroflourocarbons, perflourocarbons (PFCs), and sulfur hexaflouride (SF₆). Human-caused emissions of these GHGs in excess of natural

ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. It is extremely unlikely that global climate change of the past 50 years can be explained without the contribution from human activities (IPCC, 2008).

Climate change is a global problem. GHGs are global pollutants, unlike criteria pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas criteria pollutants and TACs with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one year to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the world. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables and cannot be pinpointed, it is understood that currently more CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO₂ emissions, approximately 54% is sequestered within a year through ocean uptake, uptake by northern hemisphere boreal forest growth, and other terrestrial sinks; whereas the remaining 46% of human-caused CO₂ emissions remains stored in the atmosphere (Seinfeld and Pandis, 1998).

Similarly, impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and TACs. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; suffice it to say, the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

Greenhouse Gas Emission Sources

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, electric utility, residential, commercial, and agricultural sectors (California Air Resources Board [CARB], 2009a). In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation (CARB, 2009a). Emissions of CO₂ are primarily byproducts of fuel combustion. CH₄, a highly potent GHG, typically results from fugitive emission sources such as agricultural activities and landfills. N₂O is also largely attributable to agricultural activities and soil management. Smaller amounts of CH₄ and N₂O emissions occur as a byproduct of fuel combustion. CO₂ sinks, or reservoirs, include vegetation and the ocean, and absorb CO₂ through sequestration and dissolution, respectively.

California has one of the largest economies in the world, and is consequently one of the larger emitters of GHGs. In 2004, California released 484 million metric tons (MMT) of CO₂e (CARB, 2009a) and is the 12th to 16th largest emitter of CO₂ in the world (CEC, 2006).

CO₂e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential (GWP), is a measure of the heat trapping ability of a given GHG over a 100-year period relative to the heat trapping ability of CO₂. Expressing individual GHG emissions as CO₂e converts the heat trapping

ability and longevity of the individual GHGs to a common basis that is equivalent to the effect that would occur if only CO₂ were being emitted.

Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2004, accounting for 38% of total GHG emissions in the State. This sector was followed by the electric power sector (including generation sources both in-state and out-of-state that supply electricity to California) (22%) and the industrial sector (20%) (CARB, 2008).

Regulatory Setting

CEQA requires that lead agencies consider the reasonable foreseeable adverse environmental effects of projects they are considering for approval. GHG emissions have the potential to adversely affect the environment because they contribute to global climate change. In turn, global climate change has the potential to result in rising sea levels, which can inundate low lying areas; to affect rain and snowfall, leading to changes in water supply; and to affect habitat, leading to adverse effects on biological and other resources. Thus, GHG emissions require consideration in CEQA documents.

In considering global climate change, past regulatory actions of the State of California are informative. For example, in 2002, the State adopted Assembly Bill (AB) 1493 requiring that the CARB adopt by January 1, 2005, regulations to achieve: "The maximum feasible reduction of greenhouse gases emitted by passenger vehicles and light duty trucks and other vehicles determined by the CARB to be vehicles whose primary use is non-commercial transportation in the state." The CARB adopted implementing regulations for AB 1493 in 2004.

In 2005, the Governor of California adopted Executive Order S-3-05, declaring that increased temperatures could reduce the Sierra Nevada mountain range's snowpack, increase air quality problems, and potentially cause a rise in sea levels. To address those concerns, the Executive Order set GHG emissions targets such that emissions would be reduced to year 2000 levels by the year 2010, year 1990 levels by the year 2020, and 80% of year 1990 levels by the year 2050.

In 2006, AB 32, the California Global Warming Solutions Act of 2006, was signed into law. AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. It requires that statewide GHG emissions be reduced to 1990 levels by 2020. To effectively implement that cap, among other things AB 32 directs the CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. In October 2008, the CARB published its climate change proposed scoping plan, which is the State's plan to achieve GHG reductions in California required by AB 32.

In August 2007, the State adopted Senate Bill (SB) 97. This bill directed the Governor's Office of Planning and Research (OPR) to prepare, develop, and transmit to the California Natural Resources Agency guidelines for the feasible mitigation of GHG emissions and the effects of GHG emissions, as required by CEQA by July 1, 2009. The Natural Resources Agency was required to certify or adopt those guidelines by January 1, 2010. Those guidelines were submitted, and on March 18, 2010 became effective. In relevant part, those guidelines in Section 15126.4(c) provide as follows:

Consistent with Section 15126.4(a), lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions. Measures to mitigate the significant effects of greenhouse gas emissions may include, among others:

- (1) Measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision;*
- (2) Reductions in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F;*
- (3) Off-site measures, including offsets that are not otherwise required, to mitigate a project's emissions;*
- (4) Measures that sequester greenhouse gases;*
- (5) In the case of adoption of a plan, such as a general plan, long range development plan, or plans for the reduction of greenhouse gas emissions, mitigation may include the identification of specific measures that may be implemented on a project-by-project basis. Mitigation may also include the incorporation of specific measures or policies found in an adopted ordinance or regulation that reduces the cumulative effect of emissions.*

In 2007, the Governor directed the California Building Standards Commission to work with specified State agencies on the adoption of green building standards for residential, commercial, and public building construction for the 2010 Building Code adoption process. That process resulted in the adoption of the 2010 California Green Building Code (CalGREEN). Specific elements of the CalGREEN Code include:

- 20% mandatory reduction in indoor water use, with voluntary goal standards for 30%, 35%, and 40% reductions;
- Separate water meters for nonresidential buildings' indoor and outdoor water use, with a requirement for moisture-sensing irrigation systems for larger landscape projects;
- Requirement for diversion of 50% percent of construction waste from landfills, increasing voluntarily to 65% and 75% for new homes and 80% for commercial projects;
- Mandatory inspections of energy systems (i.e. heat furnace, air conditioner, mechanical equipment) for nonresidential buildings over 10,000 square feet to ensure that all are working at their maximum capacity according to their design efficiencies;
- Requirement for low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particle board.

On November 2, 2010, the Goleta City Council adopted CalGREEN codified in Title 15, Chapter 15.12 of the Goleta Municipal Code as the "Green Building Code of the City". That action became effective January 1, 2011. CalGREEN mandates new requirements for planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, environmental quality, and installer and special inspector qualifications.

On November 2, 2010, the Goleta City Council also adopted an ordinance implementing a local building energy efficiency standard for the City that includes a “reach” goal of an additional 15% reduction in GHGs when compared to the Title 24 (2008) California Building Standards Code codified in Title 15, Chapter 15.13 of the Goleta Municipal Code as the “Energy Efficiency Standards”. The increased energy efficiency standards apply to new buildings or structures of any size, including the project.

Thresholds of Significance

As directed by SB 97 and noted above, the California Natural Resources Agency adopted amendments to the CEQA Guidelines that became effective on March 18, 2010. These new CEQA Guidelines provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents. According to the amendments made to Appendix G of the CEQA Guidelines, the project would have a significant impact if it would:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The adopted CEQA amendments require a Lead Agency to make a good-faith effort based, to the extent possible, on scientific and factual data in order to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project. They give discretion to the Lead Agency whether to:

- Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use; and/or
- Rely on a qualitative analysis or performance-based standards.

In addition, a Lead Agency should consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:

- The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- Whether the project emissions exceed a threshold of significance that the Lead Agency determines applies to the project; and
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

The amendments call on Lead Agencies to establish significance thresholds for their respective jurisdictions and clarify that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of CEQA’s requirements for cumulative impact analysis.

Currently, neither the State of California nor the City of Goleta has established CEQA significance thresholds for GHG emissions. Indeed, many regulatory agencies are

sorting through suggested thresholds and/or making project-by-project analyses. This approach is consistent with that suggested by CAPCOA in its technical advisory entitled “CEQA and Climate Change: Addressing Climate Change Through the California Environmental Quality Act Review (OPR, 2008A):

...In the absence of regulatory standards for GHG emissions or other specific data to clearly define what constitutes a ‘significant project’, individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice.

In June 2010, the Bay Area Air Quality Management District (BAAQMD) became the first regulatory agency in the nation to approve guidelines that establish thresholds of significance for GHG emissions (BAAQMD, 2010). These thresholds are summarized in Table 1.

**Table 1
 Bay Area Air Quality Management District GHG Thresholds of Significance**

GHG Emission Source Category	Operational Emissions
Other than Stationary Sources	1,100 MT CO ₂ e/yr OR 4.6 MT CO ₂ e/SP*/yr (residents + employees)
Stationary Sources	10,000 MT CO ₂ e/yr
Plans	6.6 MT CO ₂ e/SP*/yr (residents + employees)
*SP = Service Population	

The BAAQMD threshold is a promulgated CEQA threshold that has undergone full public review and comment, with approval by the BAAQMD governing board, and technical support by BAAQMD staff. It applies to a nine-county portion of northern California consisting of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, the western portion of Solano, and the southern portion of Sonoma counties. It extends from the urban core surrounding the San Francisco Bay to the pastoral and rural areas of Napa, Marin, Solano, and Sonoma counties. The BAAQMD GHG threshold applies to a very diverse population and land use.

The BAAQMD GHG significance threshold has a strong regulatory and technical underpinning. It is based on substantial data, is intended as a regulatory threshold, and applies in some areas of the BAAQMD jurisdiction that resemble some land use patterns in the Goleta area. The climatic regime in the Goleta-Santa Barbara area that governs energy demand for space heating and cooling is also very comparable to that occurring in the BAAQMD. Additionally, in June 2010, the Santa Barbara County Planning and Development Department produced a memorandum “Support for Use of Bay Area Air Quality Management District Greenhouse Gas Emissions Standards,” providing evidentiary support for reliance on the proposed BAAQMD standards as interim

thresholds of significance in Santa Barbara County (SBCPD, 2010). The memorandum notes that certain counties in the Bay Area are similar to Santa Barbara County in terms of population growth, land use patterns, General Plan policies, and average commute patterns and times.

Accordingly, given that the City of Goleta does not have established thresholds of significance for GHG emissions, and as the City is located in Santa Barbara County, the rationale for applicability of the BAAQMD thresholds would generally apply. Therefore, for the South Kellogg Recycling Facility project, the City has applied the following two thresholds of significance to the project. Would the project:

- 1) Exceed the daily significance threshold adopted by the Bay Area Air Quality Management District, i.e., of 1,100 MT CO₂e/yr, for operational GHG emissions and/or result in significant GHG emissions based on a qualitative analysis.
- 2) Employ reasonable and feasible means to minimize GHG emissions from a qualitative standpoint, in a manner that is consistent with the goals and objectives of AB 32.

It is also noted that the use of the BAAQMD threshold does not imply that it is a threshold that the City of Goleta has formally adopted, or should adopt, as a GHG significance threshold for all present or future project analyses.

Sea Level Rise

The chief potential impact of climate change on the project is a rise in sea level such that the project would be impacted by coastal flooding events whose intensity is enhanced by sea level rise. However, accurate assessment of the impact of climate change on the project is a highly speculative activity. Published scientific articles indicate that there is no commonly-accepted methodology that exists at this time for determining such impacts. There is lack of scientific consensus as to how potential future climate change will influence future coastal flooding storm events, and any such analysis would rely on the selection of hypothetical climate change scenarios whose predictive accuracy cannot be confirmed. Quantitative estimates of future climate impacts at any particular site are speculative and not subject to accurate evaluation at this time. In addition to the speculative nature of inquiry into the impacts of climate change on development projects, there is no requirement under CEQA that such impacts be reviewed. Impacts associated with sea level rise are therefore not analyzed in this document.

Project Specific Impacts

Given the global nature of climate change resulting from GHG emissions, GHG emission impacts are inherently cumulative in nature. As such, the determination of whether a project's GHG emissions impacts are significant depends on whether emissions would be a cumulatively considerable contribution to a significant cumulative impact. This is assessed below.

Cumulative Impacts

- a,b) There are a number of modeling tools that can be used to estimate GHG emissions associated with various project types. The most consistently used model for estimating a project's direct impacts is the Urban Emissions Model

(URBEMIS). URBEMIS is designed to model emissions associated with development of urban land uses and attempts to summarize criteria air pollutants and CO₂ emissions that would occur during construction and operation of new development. This model is publicly available and widely used by CEQA practitioners and air districts, including the CARB. Use of this model would ensure consistency statewide in how CO₂ emissions are modeled and reported from various project types (CAPCOA, 2008).

The URBEMIS model does not contain emission factors for GHGs other than CO₂, except for methane from mobile sources, which is converted to CO₂e. This may not be a major problem since CO₂ is the most important GHG from land development projects (CAPCOA, 2008). It also constitutes approximately 84% of all GHG emissions in California and is considered a “reference gas” for relating the amount of heat absorbed to the level of GHGs emitted.

The URBEMIS model also does not calculate GHGs associated with consumption of energy produced offsite (indirect impacts) and may in some instances, result in the double counting of “linked” trips (i.e., the concept that a residential trip and a commercial trip are quite possibly the same trip, resulting in “double-counting”). However, as noted above, this model is still considered appropriate. Therefore, the City’s methodology for quantifying GHG emissions relies upon the URBEMIS 2007 9.2.4 air quality modeling software, which is the most current version available.

Project Short-term Construction Emissions

Project construction activities, especially those associated with heavy equipment operations for grading, would contribute to cumulative GHGs and global climate change. Based on construction model runs conducted using the URBEMIS 2007 9.2.4 air quality modeling software for the 2008 unmitigated condition, it is anticipated that project construction-generated CO₂ emission levels would be 2.46 metric tons per day. Assuming that construction would occur over the course of a 6-month period, the project’s total GHG emissions due to construction would be 448 metric tons.

Project Operational Emissions

Direct operational CO₂ emissions would occur as a result of project-generated traffic, onsite consumption of fossil fuels for water and space heaters, and other activities such as landscape maintenance that consumes fossil fuels. Based on long-term operational model runs conducted using the URBEMIS 2007 9.2.4 air quality modeling software for the 2008 unmitigated condition, anticipated direct project operational CO₂ emissions for the proposed project are estimated at 2,017 lbs/day or 332 metric tons/year (0.91 metric tons/day).

Indirect long-term emissions associated with the project would include energy produced offsite in order to service the project (such as utility providers associated with the project’s energy and water demands). For projects such as this, these indirect emissions are expected to be minor and incremental, would not require the construction of any new utility facility, and would not conflict with programs that utility providers have adopted in order to reduce GHG contributions.

Project Significance

The project's short-term construction and long-term operational GHG emissions are substantially less than the previously noted BAAQMD threshold value. The project would implement measures required by the Green Building Code of the City and the City's Energy Efficiency Standards (the "Reach Code"). The project would also not conflict with any plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. Therefore, project contributions to cumulative GHG emissions/climate change impacts are considered less than significant.

Required/Recommended Mitigation Measures

As the impacts associated with greenhouse gas emissions are considered less than significant, no mitigation is required or recommended.

Residual Impact

Residual impacts as a result of greenhouse gas emissions would remain less than significant.

HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		■			
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			■		
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				■	
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				■	
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?		■			

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				■	
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				■	
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				■	

Existing Setting

The northern 2/3 of the project’s operational area lies within the Clear Zone of the Santa Barbara Municipal Airport (SBMA) and is located within 1,000 feet of the eastern end of the Airport’s main east/west runway (Runway 7/25). There are no private airstrips within the City or in close proximity to the project site in the surrounding unincorporated area. Although the project site has been used as an auto wrecking/salvage yard and storage area, a Phase II Environmental Assessment conducted in the Spring of 2010 did not find evidence of any onsite soil contamination in excess of County Fire Department actions levels. The project site lies well outside of any mapped high wildfire hazard area on the South Coast.

Thresholds of Significance

A significant impact with regard to hazards and hazardous materials would be expected to occur if the project resulted in any of the impacts noted in the above checklist. In addition, the City’s *Environmental Thresholds and Guidelines Manual* addresses public safety impacts resulting from involuntary exposure to hazardous materials. These thresholds focus on the activities that include the installation or modification to facilities that handle hazardous materials, transportation of hazardous materials, or non-hazardous land uses in proximity to hazardous facilities. Since the project is not a hazardous materials facility, the City’s risk based thresholds are not particularly applicable. However, for the purposes of this analysis, the project would be considered to pose a significant impact if it results in the exposure of people to a variety of hazards or hazardous materials as listed above.

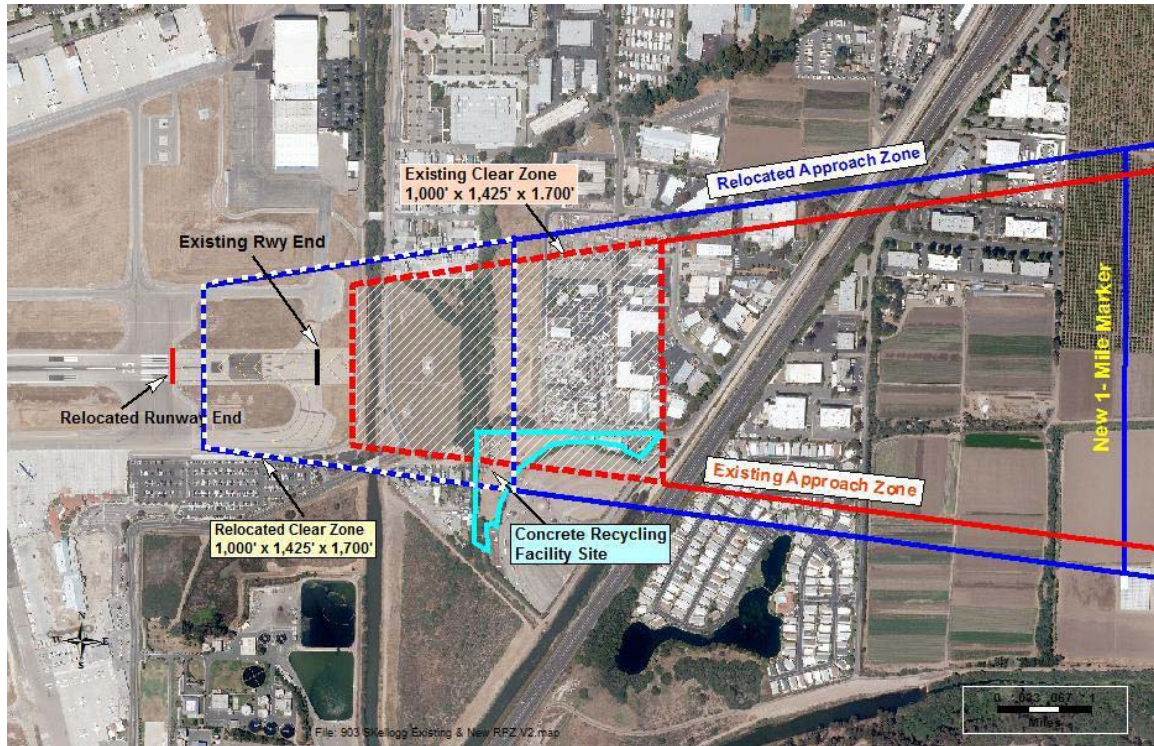
Project Specific Impacts

- a) Although the project site was used for agricultural production for over three decades, and subsequently used as an auto wrecking/salvage and storage yard beginning in 1983, a Phase II Environmental Assessment conducted by URS Corporation this Spring found no evidence of any significant soil contamination onsite (URS Corporation; July 1, 2010). However, in the unlikely event that

contaminated soils with contamination levels above County Fire Department action levels are encountered during project grading, the resulting possibility for accidental release of such contaminants into the environment would be considered potentially significant.

- b) The project would involve the production of finished road base and building materials from the recycling of concrete and asphalt/aggregate concrete spoil using in part diesel powered equipment. Although such equipment would be stored onsite in the equipment garage located south of the operational area, all fueling and maintenance activities involving the use of oils, hydraulic fluids, and engine parts cleaning solvent would be done either offsite at equipment dealer maintenance facilities or provided by mobile equipment services that would come onsite for fueling and minor maintenance. As such, no storage of hazardous or flammable materials would occur on the project site. Risks associated with the accidental spillage/release of fuel and fluids would therefore be considered less than significant.
- c,d,f) There are no private airstrips located anywhere within the City and no schools located within ¼ mile of the project site. The subject property is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no such impacts would occur as a result of project implementation.
- e) On March 22, 2002 the Airport Land Use Commission (ALUC) deemed the Santa Barbara Airport Aviation Facilities Plan (AFP) consistent with the Santa Barbara County Airport Land Use Plan (ALUP). In January 2008 the Airport relocated Runway 7/25 800 feet to the west as proposed in the ALUC's Airfield Safety Projects. On February 9, 2009 the Federal Aviation Administration (FAA) adopted the revised Airport Layout Plan (ALP) showing the relocated runway and correspondingly relocated all of the imaginary surfaces that protect flight operations, including the SBMA's Clear and Approach Zones. With exception for the 1,840 SF equipment garage, new development associated with the recycling facility lies within the current Clear Zone of the SBMA (please see Figure 1 below)

Figure 1



Source: Santa Barbara County Association of Governments Staff Report dated August 18, 2011

Airport land use compatibility refers to various types of land uses in the vicinity of the airport that do not pose significant safety hazards to either airport operations or the public and are as such considered compatible with airport operations. The Clear Zone is the most restrictive safety area as it is subject to the greatest danger from flight operations. Per FAA requirements and the ALUP, the Clear Zone must contain no obstructions that could pose a hazard to aircraft. Hazardous material storage and use within the Clear Zone are strictly prohibited and per the ALUP, most residential and commercial land uses are considered incompatible with the Clear Zone. However, storage of non-flammable materials and certain land uses with very limited population densities may be considered in the Clear Zone and must be evaluated on a case-by-case basis. Table 4-1, Footnote 6, of the ALUP, which applies to such uses, states:

Intensive development in the Clear Zone is prohibited. All specific development plans must be reviewed by the ALUC to assure that temporary or permanent concentrations of people greater than 25 people per acre are avoided, that storage of concentrations of hazardous materials will not occur, and that the local public safety agency will be able to effectively provide emergency services to the parcel.

All vehicle maintenance and fueling would be done at equipment vendor facilities or such services would be provided by mobile vendors that would come to the site to fuel and maintain the equipment. As such, no storage of any fuel or other flammable materials would occur as part of the recycling facility's operations.

According to the population density analysis prepared by ALUC staff, the project is expected to lower the population density of the project site by one (1) person/acre (please see Table 1 below)

Table 1

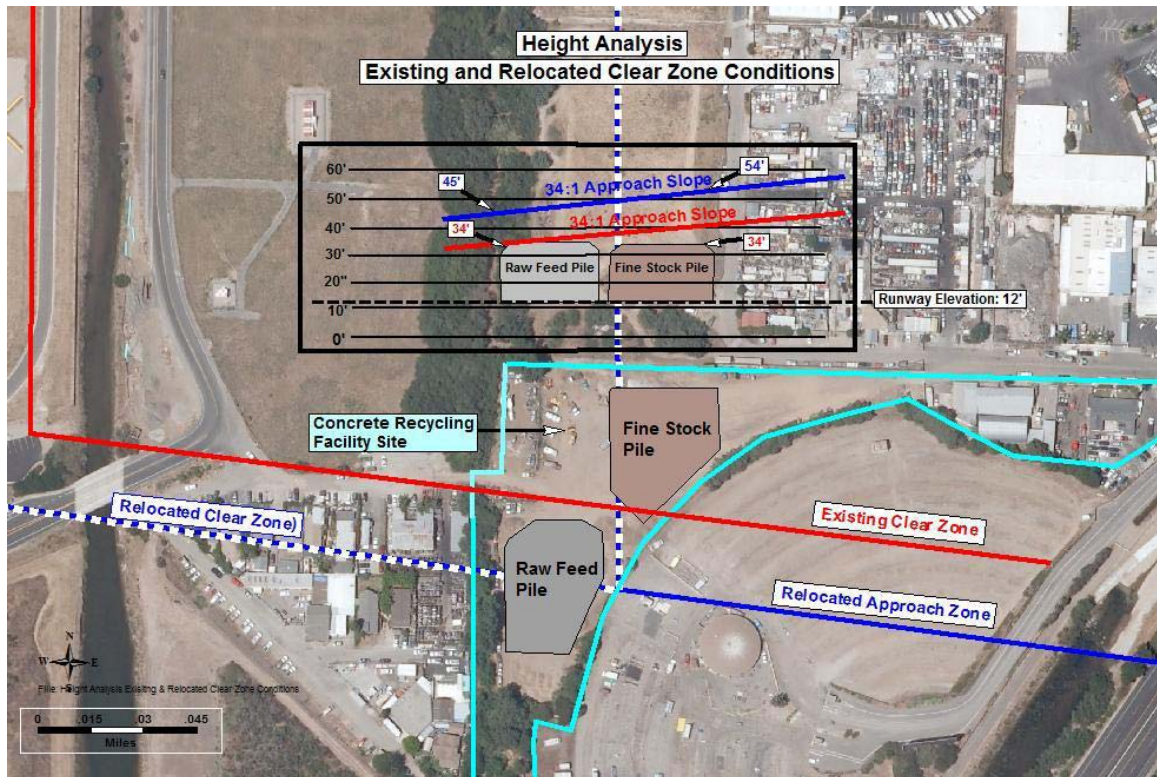
Site Plan	Land Uses	# of Employees/Customers	Acreage of project	Persons Per Acre	Persons/AC within Clear Zone
Existing	- Auto towing, wreck/repair shops, - Offices	19	4.935	3.9	2.4
Proposed	- New Recycling Fac: 5 employees, - Sales Office: 6 employees/customers	11	4.935	2.2	1.4

Source: Santa Barbara County Association of Governments Staff Report dated August 18, 2011

If the additional 15 people estimated to be currently employed onsite (Garcia's Auto Repair, Thomas Towing, and contractor facilities onsite) are added to these estimates, the population density of the subject property only increases to 5.3 people/acre, still well below the ALUP's threshold of 25 people/acre for development in the Clear Zone.

In addition, all new development within the Clear Zone is subject not only to zone district maximum height standards (35' in the M-S-GOL zone district and 45' in the M-1 zone district), but the maximum height standards established in the F (Airport Approach) Overlay District, Section 35-100.5(1), Article II, Chapter 35 of the Municipal Code (this includes project landscaping as well). Pursuant to the Airport Approach Zone Overlay District's standards for Runway 7/25 (Section 35-100.5(1), Height Restrictions), maximum allowable height would be based on a 34:1 Glide Approach Plane measured 200 feet from the edge of the runway on its centerline beginning at the elevation of the runway edge. According to ALUC staff, the edge of Runway 7/25 is 12' above mean sea level (msl). Figure 2 shows the relationship of the 34:1 Glide Approach Plane on both the old Clear Zone (prior to relocation of Runway 7/25) and the current Clear Zone based on the runway's relocation 800 feet to the west.

Figure 2



Neither the office building (16' high) or the crushing equipment (14' high) would pose an inconsistency with and/or penetrate the 34:1 Glide Approach Plane for Runway 7/25. Per project plans, the height of the raw and finished material stockpiles would be limited to 22' above finished grade or 35' above msl based on the accompanying grading plan. It should also be noted that per input provided by the applicant, equipment to move both raw material and finished product may occasionally have to operate on top of these stockpiles which could result in temporary penetrations into the Glide Approach Plane if stockpile height is not adequately restricted.

Given these factors and pursuant to GP/CLUP Policies SE 9.3 and SE 9.5, the project was forwarded to the ALUC for their review and determination as to the project's consistency with the ALUP on August 18, 2011. The ALUC discussed compatibility of the use in the Clear Zone, project-generated duct, and height of stockpiles. After taking input from ALUC staff and the applicant's project team, the ALUC unanimously voted to take no action on the referral (please refer to Attachment 5, the SBCAG Final Action letter dated August 22, 2011). Per Section 35-100.2, Article II, Chapter 35 of the Goleta Municipal Code (Coastal Zoning Ordinance), the failure of the ALUC to take action on the project results in an automatic determination of project consistency with the ALUP.

Therefore, based on the potential for an unrestricted stockpile without a height limitation to result in even temporary intrusions into the SBMA's 34:1 Glide Approach Plane, safety risks associated with the project's location within the Airport's Clear Zone are considered potentially significant.

- g,h) The recycling facility would not conflict with or physically impair implementation of any emergency evacuation or response plan. The project site is located well away from any wildfire hazard zone in or near the City.

Cumulative Impacts

As the project poses a potentially significant, project specific hazard to Airport operations and a hazardous materials risks associated with the potential for unknown soil contamination to exist onsite due to the past wrecking yard use of the property, project contributions to cumulative Airport hazards and hazardous materials risks would also be considered potentially significant.

Required Mitigation Measures

1. No material stockpiling, and/or any aspect of stockpile operations such as equipment use onsite, shall exceed an elevation of 34' feet above mean sea level for the duration of this permit. **Plan Requirements and Timing:** The permittee shall provide documentation that FAA Part 77 does not require filing of an aeronautical study/*Form 7460-1 Notice of Proposed Construction or Alteration* with submittal of any LUP application for the project. If such documentation is not available because the *Form 7460-1 Notice of Proposed Construction or Alteration* is required by a FAA Part 77 determination, the permittee shall submit the aeronautical study and *Form 7460-1 Notice of Proposed Construction or Alteration* to the FAA and provide a copy of said submittal to the City of Goleta with any LUP application for the project. Issuance of any LUP for the project in such an instance would require prior submittal to the City of Goleta of written verification of FAA approval of the aeronautical study and *Form 7460-1 Notice of Proposed Construction or Alteration*.

Monitoring: Staff shall verify compliance prior to LUP issuance for the project.

2. If contaminated soils are observed or chemical odors are detected during project grading or construction, all such work shall be stopped immediately and the Santa Barbara County Fire Department, Hazardous Materials Unit contacted. Resumption of work requires approval of the Hazardous Materials Unit. **Plan Requirements and Timing:** This requirement shall be printed on all plans submitted for LUP issuance.

Monitoring: City staff shall verify compliance prior to issuance of any LUP for the project.

3. The permittee shall sign and execute an avigation easement for the project to the benefit of the City of Santa Barbara Municipal Airport. **Plan Requirements and Timing:** The permittee shall sign and record an avigation easement to the benefit of the City of Santa Barbara and submit a copy of the recorded document to City staff prior to LUP issuance.

Monitoring: City staff shall ensure compliance prior to LUP issuance.

Residual Impacts

With implementation of these mitigation measures, residual project specific risks, as well as project contributions to cumulative hazards and risks would be considered less than significant.

HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Violate any water quality standards or waste discharge requirements?		■			
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				■	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			■		
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?		■			
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?		■			
f. Otherwise substantially degrade water quality?		■			
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				■	
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?		■			
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?		■			
j. Inundation by seiche, tsunami, or mudflow?			■		

Existing Setting

Sanitary sewage disposal for the facility would be provided by the Goleta Sanitary District. Water Service would be provided by the Goleta Water District. To the east of the project site is San Jose Creek which in this location is hard-banked and channelized before its confluence with Goleta Slough. To the west and beyond Fairview Avenue and the Old San Jose Creek Channel is San Pedro Creek, which in this location is also channelized. As historic stream flows through Old San Jose Creek have been diverted to the San Jose Creek Channel, there is no regulatory floodway for Old San Jose Creek. The entirety of the project site is located in Special Flood Hazard Area Zone A which is within the 100-year floodplain of San Jose and San Pedro Creeks but for which a base flood elevation for the 100-year event has yet to be established (Federal Emergency Management Agency; *NFIP Flood Insurance Rate Map, Panel 1362F, September 30, 2005*). The project site is however outside of any regulatory floodway (FEMA; September 30, 2005). Pursuant to the City's GP/CLUP, the entirety of the project site is outside of the City's Tsunami Inundation Area (Table 5-2, *Safety Element, City of Goleta General Plan/Coastal Land Use Plan*, amended June 22, 2010).

Thresholds of Significance

A significant impact on hydrology and water quality would be expected to occur if the project resulted in any of the impacts noted in the above checklist. In addition, the City's *Environmental Thresholds and Guidelines Manual* assume that a significant impact on hydrology and water resources would occur if a project would result in a substantial alteration of existing drainage patterns, alter the course of a stream or river, increase the rate of surface runoff to the extent that flooding, including increased erosion or sedimentation, occurs, create or contribute to runoff volumes exceed existing or planned stormwater runoff facilities, or substantially degrade water quality.

Project Specific Impacts

- a,f) The project would not result in the discharge of sanitary wastewater that violates any water quality standards due to the fact that all onsite sanitary sewer facilities would be connected to the Goleta Sanitary District's collection system. Furthermore, as the project would involve stockpiling of raw concrete spoil and finished road base, such storage poses the potential to result in sediment laden stormwater runoff that if allowed to flow untreated offsite, could result in the introduction of sediment into the City's surface water bodies such as San Jose Creek and the Goleta Slough. Such impacts to water quality would be considered potentially significant.

- b) The only impervious surface introduced to the subject property as a result of project implementation would be the 960 square-foot sales-office building, 1,840 square-foot equipment garage, and associated paved parking areas and roadway entrance to the project site. The remainder of the operational area and internal access system would be maintained in a pervious, compacted earth/road base condition. As the increase in impervious surface posed by the project is so minor, impacts to groundwater recharge and/or groundwater supplies would be considered non-existent.

- c) The project would not alter any existing drainage way or drainage pattern in the area. Specifically, the facility would be separated from Old San Jose Creek by a raised pad of approximately four (4) feet in height contained by a retaining wall at the 25-foot SPA/riparian buffer. The grading plan would grade the site so that stormwater runoff would flow either to a central catch basin in the operational area that would discharge into a “rain garden” detention basin before release into Old San Jose Creek, or route runoff to the north where it would be captured by a 270’ long 2’ x 6” gravel-lined asphalt V-swale that would filter stormwater runoff before being discharged through a catch-basin into the existing flow-line of South Kellogg Avenue. As such, the project’s drainage pattern and associated drainage control improvements would not significantly alter any existing drainage way or contribute to the erosion of any such drainage.

- d,e) Stormwater runoff from the project site would increase above the baseline level due to the addition of 2,800+ square feet of structures and paved areas for parking and onsite access. Runoff from these new impervious surfaces would either be routed to a 270’ long, 2’ x 6” gravel-lined asphalt V-swale along the southerly edge of the existing public road easement at the northern end of the property line where it would then be discharged into the flow-line of South Kellogg Avenue or captured by a central catch basin in the operational area which would convey such runoff to a 250-foot long “rain garden” detention area abutting Old San Jose Creek on the west side of the property. As the applicant’s drainage plan was not accompanied by drainage calculations, including a stormwater hydrograph, the adequacy of the “rain garden” to prevent offsite post-development stormwater discharge from exceeding the pre-development condition has yet to be demonstrated. Therefore, drainage impacts posed by the project are considered potentially significant.

- g) Although the entirety of the project site lies within Zone A of the 100-year floodplain of San Jose and San Pedro Creeks, no new residential development is proposed therefore no associated flooding impacts would occur as a result of project implementation.

- h) Although the project site is located well away from any mapped regulatory floodway, requirements for restoration and enhancement of the 25-foot SPA along the riparian corridor of Old San Jose Creek would encroach into the County Flood Control District’s 60-foot wide easement measured from the western property line. This easement allows the Flood Control District access to the creek channel for floodwater conveyance capacity maintenance purposes. Therefore, if such biological restoration/enhancement efforts resulted in a significant obstacle to such Flood Control District access to the channel, the ensuing inability to maintain the conveyance capacity of the creek channel could result in a potentially significant flooding impact.

- i) There are no dams on either San Jose or San Pedro Creeks in close enough proximity to the project site that could threaten the facility if they were to fail. Although San Jose and San Pedro Creeks are both channelized and hard-banked upstream from the project site, these channel improvements do not extend significantly above the surrounding existing grade of the areas adjoining these stream channels. Therefore, any failure in these hard-banked channels would not

subject the project site to the kind of flooding hazard posed by a levee failure such as could occur in the Sacramento/San Joaquin Delta.

Although FEMA does not establish base flood elevations for Zone A, the project would still be subject to the City's Floodplain Management Ordinance, codified in Title 15, Chapter 15.10 of the Goleta Municipal Code, requirements for elevating the first floor of any habitable structure above the floodplain. Since a specific actual base flood elevation for the project site has not been determined by FEMA, first floor elevation standards for the project would be determined by the City's Director of Community Services who administers the *Floodplain Management Ordinance*. Therefore, until the Director of Community Services has completed an assessment of the flooding potential for the site and determined what the minimum allowable first floor elevation must be, project impacts regarding the location of the sales-office building and garage within the FEMA mapped Zone A of the 100-year floodplain are considered potentially significant

- j) The project site lies entirely out of the Tsunami Inundation Hazard Area as mapped per the City's GP/CLUP. Therefore, such risks would be considered less than significant.

Cumulative Impacts

Project contributions to cumulative impacts on water quality, stormwater runoff, and flooding would be considered potentially significant.

Required Mitigation Measures

1. The permittee shall obtain written approval from the County Flood Control District for all drainage control and riparian restoration/enhancement improvements within the 60-foot Flood Control District easement along Old San Jose Creek. **Plan Requirements and Timing:** Prior to LUP issuance, the permittee shall submit to City staff written verification of Flood Control District approval for such improvements.
Monitoring: City staff shall verify compliance prior to LUP issuance. City staff shall verify completion of the riparian restoration/enhancement improvements per the approved landscape plan prior to any occupancy clearance for the project.
2. The permittee shall prepare the appropriate study(s) to determine the elevation of the 100-year floodplain on the project site to establish the first floor elevation for both the sales-office building and equipment storage garage pursuant to the City's *Floodplain Management Ordinance*. **Plan Requirements and Timing:** The permittee shall fund the necessary study(s), prepared by a licensed civil engineer, necessary to establish the correct 100-year floodplain elevation in the vicinity of the project site. This study shall be reviewed and approved by the Director of Community Services and all architectural plans submitted for any LUP or building permit shall identify the approved elevation of the 100-year floodplain on the plans and ensure that the first floor elevations of both the sales-office and garage are at least two (2) feet above that elevation.

Monitoring: City staff shall verify compliance with the aforementioned requirement on all plans submitted for issuance of any LUP or building permit. Prior to any required foundation inspection before concrete is poured, the first floor elevation of both the sales-office and garage shall be established by a California licensed surveyor and submitted for verification to City staff.

3. The permittee shall provide proof of a National Pollutant Discharge Elimination System (NPDES) Storm Water Permit from the California Regional Water Quality Control Board or provide proof of exemption from a NPDES permit. **Plan Requirements and Timing:** The permittee shall submit proof and City staff shall review and approve documentation prior to LUP issuance.

Monitoring: City staff shall review the documentation prior to LUP issuance.

4. The permittee shall prepare a Storm Water Pollution Prevention Plan (SWPPP) covering all phases of grading operations. **Plan Requirements:** The SWPPP shall be prepared by a licensed civil engineer and incorporate all appropriate Best Management Practices (BMPs) necessary to mitigate short-term construction impacts. The plan may include, but is not limited to, the following BMPs:
 - a) Temporary berms and sedimentation traps (such as silt fencing, straw bales, and sand bags); the BMPs shall be placed at the base of all cut/fill slopes and soil stockpile areas where potential erosion may occur and shall be maintained to ensure effectiveness; the sedimentation basins and traps shall be cleaned periodically and the silt shall be removed and disposed of in a location approved by the City;
 - b) Non-paved areas shall be revegetated or restored (i.e. geotextile binding fabrics) immediately after grading and installation of utilities, to minimize erosion and to re-establish soil structure and fertility; revegetation shall include drought-resistant, fast-growing vegetation that would quickly stabilize exposed ground surfaces; alternative materials rather than reseeding (e.g., gravel) may be used, subject to review and approval by Planning and Environmental Services and Community Services;
 - c) Runoff shall not be directed across exposed slopes; all surface runoff shall be conveyed in accordance with the approved drainage plans;
 - d) Energy dissipaters or similar devices shall be installed at the end of drainpipe outlets to minimize erosion during storm events;
 - e) Grading shall occur during the dry season (April 15th to November 1st) unless a City approved erosion control plan is in place and all erosion control measures are in effect; erosion control measures shall be identified on an erosion control plan and shall prevent runoff, erosion, and siltation; all exposed graded surfaces shall be reseeded with ground cover vegetation to minimize erosion; graded surfaces shall be reseeded within four (4) weeks of grading completion, with the exception of surfaces graded for the placement of structures; these surfaces shall be reseeded if construction of structures does not commence within four (4) weeks of grading completion.

Timing: The final drainage/stormwater quality protection plan shall be submitted to City staff for review and approval prior to LUP issuance.

Monitoring: City staff shall verify that the SWPPP has been implemented per the approved final plan prior to commencement of grading.

5. The permittee shall prepare a final drainage/stormwater quality protection plan consistent with the City's Storm Water Management Plan that identifies all Best Management Practices (BMPs) to be incorporated into the project design. **Plan Requirements:** The final drainage/stormwater quality protection BMPs plan shall be prepared by a licensed civil engineer. The plan may include, but is not limited to, the following BMPs:
 - a) A final drainage analysis that provides final calculations on pre/post development stormwater runoff volumes, required storage capacity, specifications on all elements of the drainage control system, and complies with the City's Interim LID Strategies for a Tier 3 project over 20,000 square feet;
 - b) Regular maintenance and cleaning of catch basins and detention basins;
 - c) Routine cleaning of streets, parking lots, and storm drains;
 - d) Stenciling of all storm drain inlets to discourage dumping by informing the public that water flows to the ocean;
 - e) Development of an integrated pest management program for landscaped areas of the project, emphasizing the use of biological, physical, and cultural controls rather than chemical controls;
 - f) Provision of educational flyers to residents/commercial tenants regarding proper disposal of hazardous water and automotive waste;
 - g) Provision of trash storage/material storage areas that are covered by a roof and protected from surface runoff.

Timing: The final drainage/stormwater quality protection plan shall be submitted to City staff for review and approval prior to LUP issuance.

Monitoring: City staff shall verify that drainage/stormwater quality protection plan has been constructed/installed per the approved final plan prior to final inspection.

6. The permittee shall prepare a maintenance agreement that addresses maintenance requirements for all improvements associated with the stormwater quality protection/BMPs described in the final drainage/stormwater quality protection plan. **Plan Requirements:** At a minimum, the maintenance agreement shall include requirements that all inline stormdrain filters shall be inspected, repaired, and cleaned per manufacturer specifications and at a minimum prior to September 30th of each year. Additional inspections, repairs, and maintenance shall be performed after storm events as needed throughout the rainy season (November 1st to April 15th) and/or per manufacturer specifications. Any necessary major repairs shall be completed prior to the next rainy season. Prior to September 30th of each year, the permittee shall submit to

the City for its review and approval a report summarizing all inspections, repairs, and maintenance work done during the prior year. **Timing:** The permittee shall submit the required maintenance agreement to City staff for review, approval, and execution prior to LUP issuance.

Monitoring: City staff shall periodically verify compliance with the provision of the agreement and respond to instances of non-compliance with the agreement.

Further mitigation to address erosion control is addressed in the Geology and Soils section of this document.

Residual Impacts

With implementation of these mitigation measures, project specific residual impacts involving exposure to flooding risks, stormwater runoff, and water quality, as well as residual project contributions to such cumulative impacts would be less than significant.

LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Physically divide an established community?				■	
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for purpose of avoiding or mitigating an environmental effect?			■		
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				■	

Existing Setting

The 4.935 acre project site already accommodates 10,700+ square feet of structural development and several commercial operations onsite include a towing service, auto repair shop, and auto body shop. The subject property is located entirely within the Coastal Zone of the City and is designated as Service Industrial (I-S) under the City's GP/CLUP. The property north of the Santa Barbara Airport's Clear Zone as mapped on the site is zoned Service Industrial, Goleta (M-S-GOL) while that portion of the property to the south of the mapped Clear Zone is zoned Light Industry (M-1). The Santa Barbara County Flood Control District holds a 60-foot wide easement along Old San Jose Creek on the western portion of the project site where the creek channel lies. The City of Goleta holds a 17-foot wide easement along the northern portion of the property and the City of Santa Barbara holds a "Clear Zone" easement across the northern portion of the site that depicts the location of the Airport's previous Clear Zone prior to recent runway relocation.

Thresholds of Significance

A significant land use and planning impact would be expected to occur if the project resulted in any of the impacts noted in the above checklist.

Project Specific Impacts

- a,c) The recycling facility would not physically divide a community or neighborhood nor would it conflict with any habitat conservation/preservation plan, Therefore, associated project specific impacts on land use and planning would be considered less than significant

- b) The project site is subject to a wide variety of policies from the City's GP/CLUP, the Airport Land Use Plan (ALUP), as well as development standards set forth in the City's Coastal Zoning Ordinance (CZO).

GP/CLUP:

Conservation Element Policy CE 2.2—This policy establishes a Stream Protection Area (SPA) or buffer along all creeks identified as blue-line streams pursuant to Figure 4-1 of the GP/CLUP's Conservation Element. As Old San Jose Creek is identified on Figure 4-1 as a blue-line stream, the protective provisions of CE 2.2 apply. Specifically, CE 2.2 establishes a 100-foot SPA, measured from either the edge of riparian vegetation or the top-of-bank, whichever is greater, as the standard buffer along all creeks identified in Figure 4-1. The purpose of the policy is to ensure that the SPA is maintained in a "natural state" to "protect associated riparian habitats and ecosystems." While the SPA standard per the policy is 100 feet, the width of the SPA may be increased or decreased during environmental review of a project if certain criteria are met as established under the policy. Specifically, the SPA may be reduced from 100 feet to no less than 25 feet if; "(1) there is no feasible alternative siting for development that will avoid the SPA upland buffer; and (2) the project's impacts will not have significant adverse effects on streamside vegetation or the biotic quality of the stream."

As far as the first criteria for a reduction in the SPA, the project includes a request for a 25-foot SPA along Old San Jose Creek measured from either the edge of riparian vegetation or the top-of-bank, whichever is greatest. The edge of the SPA would be established by a four to six foot high retaining wall that would retain the raised operational area consisting of compacted fill to the east of the wall. From the retaining wall to the edge of riparian corridor, the SPA would be left in a natural state except for implementation of a riparian revegetation/restoration plan to be approved by the City. As can be seen from the map of the riparian corridor done by the applicant's biological consultant (please refer to Attachment 2), imposition of a 100-foot SPA would preclude any use of the subject property below the point where the western property boundary abuts Placencia Street and City of Santa Barbara Airport property. Even with a 50-foot SPA, the portion of the project site south of the eastern terminus of Placencia Street would be so constrained that it would not be possible to maintain adequate material storage and provide for adequate emergency vehicle

access through the facility. In fact, for operational purposes, the applicant needs to retain roughly the same size area for finished material storage area as would be needed for raw material storage to ensure that he has adequate supplies of product onsite to accommodate daily demand for large construction projects. Therefore, given the need for emergency vehicle access around the entirety of the operational area, the operational requirement that roughly equivalent raw material and finished product storage areas are maintained to provide for the facility's ability to respond to daily market demands, and the need to locate the crusher and associated equipment in the center of the raw and finished material storage areas for operational efficiencies, it would not be possible to accommodate all of these project elements given the size and configuration of the subject property with any SPA beyond 25 feet required.

Secondly, as noted in the discussion of Biological Resources, a 25-foot SPA in this instance, with native riparian revegetation/restoration program would protect the associated riparian habitats and ecosystems from adverse "edge effects" at the urban development/riparian corridor interface including, but not limited to, exposure to urban runoff from developed areas, increased soil erosion of the stream channel and riparian corridor, invasion of non-native plant species into the riparian corridor, and urban intrusion into wildlife movement corridors. In addition, project implementation would include re-grading of the project site so that all stormwater runoff would be directed northward, away from the creek and to stormwater facilities that would control its rate of offsite discharge, protect against the introduction of sediment laden runoff into the stream channel, and provide for BMPs to ensure that the water quality of nearby surface water bodies is not further impaired.

Although a SPA of between 100 and 25 feet would also be capable of protecting the creek channel and riparian corridor from the adverse effects of urban runoff, heightened erosion, invasive, non-native plants, and intrusion into wildlife movement corridors, as well as provide ample space for riparian revegetation and restoration, the level of increased benefit achieved by imposition of a larger SPA would be marginal at best. Furthermore, in this instance imposition of a 100, or even 50-foot buffer, would so constrain the southerly two-thirds of the project site as to make it unusable for material stockpiling or for the provision of adequate emergency vehicle access through the site, thereby making the subject property infeasible for the project. Given that even with only a 25-foot buffer, the associated change in the creek's baseline condition as a result of project implementation would include removal of all wrecked cars from the riparian corridor, implementation of a native riparian revegetation/restoration effort along the creek, implementation of drainage improvements and BMPs that would protect water quality and the existing riparian corridor from erosion caused by urban runoff, a 25-foot SPA in this instance is justified and consistent with the requirements of CE 2.2.

Safety Element Policy SE 9.3—SE 9.3 recognizes that use and development of land in proximity to the Airport needs to be compatible with Airport operations and that where mandated by the ALUP, proposals for such use and development shall be referred to the ALUC. As noted in the Hazards and Hazardous Materials discussion above, the project was referred to the ALUC and on August 18, 2011

the ALUC took no action on the referral. As such, and pursuant to Section 35-100.2 of the Coastal Zoning Ordinance, the failure of the ALUC to take action on the referral results in a finding of project consistency with the ALUP by default.

Safety Element Policy SE 9.5—SE 9.5 establishes limitations on population densities and the intensity of development near the Santa Barbara Municipal Airport in conjunction with the safety and compatibility guidelines set forth in the ALUP. Specifically, the ALUP prohibits intensive development in the Airport's Clear Zone and limits concentrations of people in the Clear Zone to 25 people/acre or less. Furthermore, the storage of non-flammable material is considered a permissible use in the Clear Zone (Table 4-1, Footnote #6 of the ALUP), so long as such storage does not involve storage of hazardous materials or adversely affect the ability of public safety agencies to respond to emergencies. As noted in the discussion under the Hazards and Hazardous Materials, the project would not involve the storage onsite of any hazardous materials or adversely affect the ability of public safety agencies to respond to emergencies onsite or in the nearby vicinity.

Transportation Element Policy TE 5.3 Fowler Road Extension—The northern portion of the project site lies within the alignment of the planned Fowler Road extension that would connect South Kellogg Avenue to Fairview at the current intersection of Fairview/Fowler/Placencia and includes an existing 17-foot wide easement to the City for road purposes (recorded in Book 2530, Page 158 of the Santa Barbara County Official Records). Under Policy TE 5.3 of the City's GP/CLUP, this planned connection is considered a critical capital improvement to ensure the adequacy and safety of the City's street network and circulation system. The project will not be located within the City's easement and is not otherwise inconsistent with the Fowler Road extension.

ALUP:

Please see the discussion of the project's consistency with General Plan Safety Element Policy SE 9.3 above as well as the discussion of potential airport hazards in the Hazards and Hazardous Materials section of this document.

CZO:

M-S-GOL Landscape Screening Requirements—Sections 35-84A.12(3) and 35-84A.12(5), Article II, Chapter 35 of the Municipal Code establish requirements for all properties zoned M-S-GOL within the Coastal Zone of the City. Specifically, these standards include provision of a 10-foot landscaped area between any ROW and any fencing along such ROW. Rather, the applicant is asking for approval of a modification to those standards to allow for the installation of a 6-foot high chainlink fence at the property line to improve site security and prevent trash from blowing onto the property. As discussed in the Aesthetics section of this document, requiring an intervening 10-foot wide landscape strip between the roadway of South Kellogg and Technology Drive and the front yard fence-line would place such landscaping in a location within the City's 17-foot public road easement whereby the permittee would have to remove the landscaping upon notice from the City for the planned Fowler Road

extension. Furthermore, given the area's industrial character and lack of any frontage improvements or screening landscaping, and in consideration that at least the design of the fencing would be subject to review and approved by the DRB to ensure the most aesthetically pleasing fence design possible, the lack of frontage landscaping in this instance would not adversely affect the visual quality of the area. Finally, if a 10-foot landscape strip was required immediately to the south of the 17-foot public road easement, the site, which is already significantly constrained, would be so restricted in usable area as to place the viability of the entire project into question. Therefore, staff finds that the visual impacts resulting from such a modification could be feasibly mitigated to less than significant levels by the imposition of appropriate design standards for the fencing through the City's DRB review process.

It should also be noted that Section 35-84A.12(5) requires the planting of screen trees between 20 and 40 feet in height within this 10-foot landscape strip to screen stockpiled material in excess of six (6) feet in height. However, Section 35-84A.12(5) does allow for deviation from this standard where warranted by the height restrictions of the F Overlay Zone District. As noted on the project landscape plans, no such plantings are planned either outside of the property line fence or on its interior. In this particular instance, this plan is not in conflict with the ordinance since flexibility in its application of this specific requirement is already built into this development standard. The basis for this determination is that given the proximity of the project site to the Airport, its location within the Clear Zone, and the more restrictive height restrictions based on a 34:1 glide approach plane, any requirements for trees above the level of the screening fence would only exacerbate Airport safety concerns and create the need for additional mitigation measures that would require a significant, and in this case unwarranted, enforcement effort.

Required/Recommended Mitigation Measures

No mitigation is required or recommended.

Residual Impacts

With implementation of the mitigation measure identified in the Biological Resources and Hazards/Hazardous Materials sections of this document, project consistency with applicable policies of the City's GP/CLUP would be achieved. Through approval of the requested modification, consistency with all applicable zone district development standards would also be maintained.

MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				■	
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				■	

Existing Setting

Based on information provided by the project archaeologist, the project site was inundated and part of the Goleta slough until at least 1861 (Dudek, June 18, 2010). The property was vacant until 1928 when an irrigation reservoir, barn, and (lemon) orchards were developed on the property. After 1961, the site was allowed to go fallow. Research and development companies and Santa Barbara Transportation occupied these adjacent properties along with a lumberyard. In approximately 1983, an auto salvage and parts recycling operations commenced on site (Dudek, July 1, 2010). There is no evidence that extraction of mineral resources ever occurred onsite.

Thresholds of Significance

A significant impact on mineral resources would be expected to occur if the project resulted in any of the impacts noted in the checklist above.

Project Specific Impacts

a,b) There no known mineral resources of importance to the region or the state onsite and the project site is not designated under the City's General Plan/Coastal Land Use Plan as an important mineral resource recovery site. Associated impacts as a result of project implementation would not occur.

Cumulative Impacts

As there are no project specific impacts on mineral resources, project contributions to cumulative impacts on mineral resources in the area would also not occur.

Required/Recommended Mitigation Measures

No mitigation is required or recommended.

Residual Impacts

None.

NOISE

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		■			
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			■		
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?		■			
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		■			
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			■		
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				■	

Existing Setting

The entirety of the project site lies within the 65 dB(A) noise contour of the Airport. Other significant contributors to the existing noise environment in the vicinity are Highway 217 and the various industrial uses that surround the subject property. However, the Airport's noise contour represents the most significant source of noise that the project site is exposed to.

Noise is defined as unwanted or objectionable sound. The measurement of sound takes into account three variables; 1) magnitude, 2) frequency, and 3) duration. Magnitude is the measure of a sound's "loudness" and is expressed in decibels (dB) on a logarithmic scale. Decibel levels diminish (attenuate) as the distance from the noise source increases. For instance, the attenuation rate for a point noise source is 6dB every time the distance from the source is doubled. For linear sources such as Highway 101 or the railroad tracks, the attenuation is 3 dB for each doubling of distance from the source. Generally speaking, an increase in noise levels of 1 dB is barely perceptible while a change of 3 dB or more is clearly perceptible to someone with normal hearing.

The frequency of a sound relates to the number of times per second the sound vibrates. One vibration/second equals one hertz (Hz). Normal human hearing can detect sounds ranging from 20 HZ to 20,000 Hz. A-weighted noise is weighted to better represent this

characteristic of human hearing. Therefore, noise levels experienced by people are typically denoted as dB(A).

Duration is a measure of the time to which the noise receptor is exposed to the noise. Because noise levels in any given location fluctuate during the day, it is necessary to quantify the level of variation to accurately describe the noise environment. One of the best measures to describe the noise environment is the Community Noise Equivalent Level or CNEL. CNEL is a noise index that attempts to take into account differences in the intrusiveness of noise between daytime hours and nighttime hours. Specifically, CNEL weights average noise levels at different times of the day as follows:

Daytime—7 am to 7 pm	Weighting Factor = 1 dB
Evening—7 pm to 10 pm	Weighting Factor = 5 dB
Nighttime—10 pm to 7 am	Weighting Factor = 10 dB

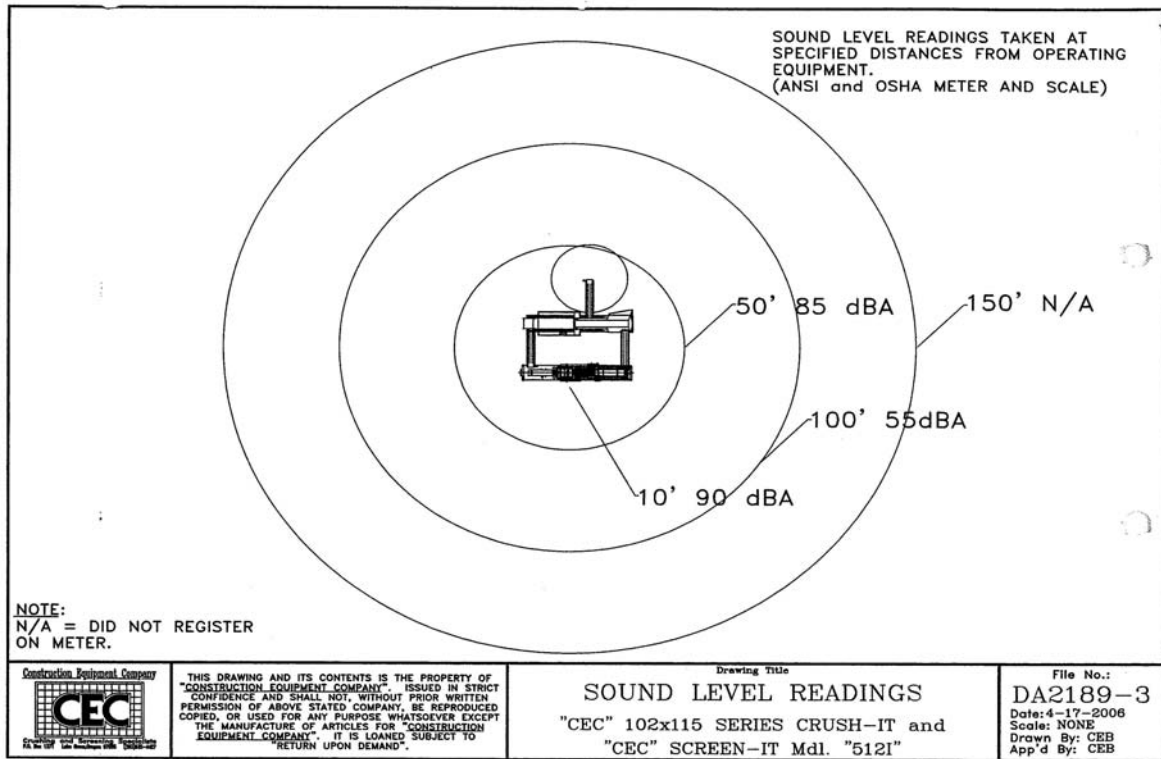
Thresholds of Significance

A significant noise impact would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additional thresholds are contained in the City's *Environmental Thresholds and Guidelines Manual*. The City's adopted thresholds assume that outdoor CNEL noise levels in excess of 64 dB(A) are considered to pose significant noise impacts on sensitive receptors.

Project Specific Impacts

- a,c) As noted above, the project site lies entirely within the existing 65 dB(A) CNEL noise contour of the Airport. As such, Airport noise is the predominant noise source in this area. Data provided by the manufacturer of the concrete crusher to be used onsite shows the following attenuation rates for this type of equipment as noted in Figure 3:

Figure 3



Two residential areas, one the Rancho Goleta Mobile Home Park on the east side of State Route 217, located approximately 900' to the east of the crusher location and several residential units interspersed with the existing commercial development on Placencia, Corta, and South Fairview located a minimum of 350' from the crusher location are the closest sensitive noise receptors to the project site. Pursuant to the Noise Element of the GP/CLUP (Table 9-2), normally acceptable noise exposure levels for residential units is 50-60 dB(A) and conditionally acceptable noise exposure levels is 60-65 dB(A). Based on the data provided by the manufacturer of the crusher, noise levels from the concrete recycling operation should not be noticeable to residents of these to residential areas. However, using the point source attenuation rate from the City's *Environmental Thresholds and Guidelines Manual* of 6 dB(A) for every doubling of the distance from the noise source, and applying that rate to the 90 dB(A) noise level measured by the crusher manufacturer at ten (10) feet from the source, noise levels from the crushing operation anticipated to be experienced by residential units to the west of the project site should be in the neighborhood of 60 dB(A). However, given the measured noise level at 50' of 85 dB(A), and applying the City's adopted attenuation rate of 6 dB(A) for every doubling of distance from the source, a more conservative approach would result in anticipated project generated noise levels of 67 dB(A) at 400 feet and 61 dB(A) at 800'. Given this more conservative or "worst case" scenario, project impacts on residences to the west of the project site are considered potentially significant.

- b) The recycling facility would not generate excessive groundborne vibration or groundborne noise levels. The facility would utilize rubber-tired equipment to unload, load, and move raw material and finished product around the site and the crusher would be located above ground and would not generate significant levels of groundborne vibrations. Associated impacts are considered less than significant.
- d) Per the City's adopted *Environmental Thresholds and Guidelines Manual*, construction/grading generated noise measured 50' from the source is anticipated to reach 95 dB(A). Using the 6 dB(A) attenuation rate every time the distance from the source is doubled, sensitive receptors within 1,600 feet of the project site are considered to be exposed to significant levels of construction related noise. Residential units off Placencia, Corta, and Fairview are the closest sensitive receptors to the project site and given the proximity to the property to these units, construction related noise impacts are considered potentially significant.
- e) As noted above, the project site is located entirely within the 65 dB(A) Airport noise contour. Pursuant to the Noise Element of the GP/CLUP (Table 9-2), normally acceptable noise levels of industrial and manufacturing uses are 50-70 dB(A) and conditionally acceptable at 70-75 dB(A). As such, ambient noise levels would not pose a significant noise impact on employees or visitors to the project site. However, as noise levels from the crushing operation itself would exceed these guidelines substantially, the operation and equipment to be used to recycle concrete would pose a significant noise impact to people onsite. Industrial safety precautions and measures are administered by the California Occupational Health and Safety Administration (Cal OSHA) and the operator of the facility would be required to meet Cal OSHA's safety requirements, including hearing protection for people onsite. Therefore, project impacts on employees and visitors to the site would be considered less than significant.
- f) There are no private airstrips anywhere within the City. No associated noise impacts would occur as a result of project implementation.

Cumulative Impacts

As project specific construction and operational noise would pose a potentially significant impact on sensitive receptors in the area, project contributions to cumulative noise levels are also considered potentially significant.

Required Mitigation Measures

1. Concrete crushing/recycling operations are limited to the hours of 8:00 AM to 4:00 PM, Monday through Friday while sales of finished product shall be limited to the hours of 6:00 AM to 4:00 PM Monday through Friday. Concrete crushing/recycling operations shall generally not be allowed on weekends and State holidays. Exceptions to these restrictions may be made in extenuating circumstances (in the event of an emergency for example) on a case by case basis at the discretion of the Director of Planning and Environmental Services. The permittee shall post the allowed hours of operation near the entrance to the site, so that workers on site are aware of this limitation. **Plan Requirements and**

Timing: Three (3) signs stating these restrictions shall be provided by the permittee and posted on site. Such signs shall be a minimum size of 24" x 48." All such signs shall be in place prior to beginning commencement of any grading/demolition and maintained through to occupancy clearance.

Monitoring: City staff shall monitor compliance with restrictions on the hours of operation for all concrete and asphalt/aggregate concrete crushing/recycling, and shall investigate and respond to all noncompliance complaints.

2. All noise-generating project construction activities shall be limited to Monday through Friday, 8:00 AM to 5:00 PM. Construction shall generally not be allowed on weekends and State holidays. Exceptions to these restrictions may be made in extenuating circumstances (in the event of an emergency, for example) on a case by case basis at the discretion of the Director of Planning and Environmental Services. The permittee shall post the allowed hours of operation near the entrance to the site, so that workers on site are aware of this limitation.
Plan Requirements and Timing: Three (3) signs stating these restrictions shall be provided by the permittee and posted on site. Such signs shall be a minimum size of 24" x 48." All such signs shall be in place prior to beginning commencement of any grading/demolition and maintained through to occupancy clearance.

Monitoring: City staff shall monitor compliance with restrictions on construction hours, and shall investigate and respond to all noncompliance complaints.

3. The following measures shall be incorporated into grading and building plan specifications to reduce the impact of construction noise:
 - a) All construction equipment shall have properly maintained sound-control devices, and no equipment shall have an unmuffled exhaust system.
 - b) Contractors shall implement appropriate additional noise mitigation measures including but not limited to changing the location of stationary construction equipment, shutting off idling equipment, and installing acoustic barriers around significant sources of stationary construction noise.

Plan Requirements and Timing: All of the above mitigation measures shall be noted on all plans submitted for any LUP and/or building permit(s).

Monitoring: City staff shall verify compliance prior to any LUP or building permit(s) issuance as well as conducting periodic field inspections.

Residual Impacts

With implementation of these mitigation measures, residual project related noise impacts as well as residual noise contributions to cumulative impacts would be considered less than significant.

POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			■		
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				■	
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				■	

Existing Setting

The applicant estimates that five (5) employees would be needed to operate the facility. This would be beyond the approximately 15 people already employed on the subject property. The project would not involve the extension of any new roads, water, or sewer lines into any area not already served by such infrastructure.

Thresholds of Significance

A significant impact on population and housing would be expected to occur if the project resulted in any of the impacts noted in the above checklist.

Project Specific Impacts

- a) The recycling facility is anticipated to employ up to between five and six people. Such an increase in area employment would only have a de minimis impact on population growth in the City. The project would not involve the construction of new infrastructure such as roads, sewer, or water lines that could have a growth inducing effect in western Goleta. Hence, the growth inducing potential of the project would be considered less than significant.
- b,c) The project site is developed with the remnants of an auto wrecking and salvage yard and a mix of businesses in the northeast corner of the property. Project implementation would not result in the loss of any existing housing or displacement of current city residents. No such population or housing impacts would occur as a result of project implementation.

Cumulative Impacts

Project contributions to cumulative population and housing impacts within the City are considered less than significant and/or would not occur.

Required/Recommended Mitigation Measures

No mitigation is recommended or required.

Residual Impacts

None.

PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of these public services:					
fire protection?		■			
police protection?				■	
schools?				■	
parks?				■	
other public facilities?				■	

Existing Setting

Fire Protection

Fire protection services would be provided by the Santa Barbara County Fire Department (SBCFD). The primary responding station would be Fire Station 12, located at 5330 Calle Real, just off Patterson Avenue on the north side of US 101.

The National Fire Protection Association (NFPA) and the SBCFD identify the following three guidelines regarding the provision of fire protection services:

- 1) A firefighter-to-population ratio of one firefighter on duty 24 hours a day for every 2,000 persons is the ideal goal. However, one firefighter for every 4,000 persons is the maximum population that should be served.
- 2) A ratio of one engine company per 12,000 persons, assuming three firefighters per station (or 16,000 persons assuming four firefighters per station), represents the maximum population that should be served by a three-person crew.
- 3) A five-minute response time in urban areas.

The mandated Cal-OSHA requirement for firefighter safety, known as the “two-in-two-out rule”, is also applicable. This rule requires a minimum of two personnel to be available

outside a structure prior to entry by firefighters to provide an immediate rescue for trapped or fallen firefighters, as well as immediate assistance in rescue operations.

Station 12 has a staff of three personnel, consisting of an engine company captain, engineer, and firefighter. This station provides immediate response on incidents as determined by the type of call. The following is an assessment of the current situation regarding Fire Station 12 and the NFPA and SBCFD guidelines noted above (City of Goleta, General Plan/CLUP Final EIR, Table 3.12-1; 2006):

- 1) The current ratio of firefighters to population at Fire Station 12 is 1:5,541.
- 2) Fire Station 12 currently serves a population of 16,623, which is above the ratio of one engine company (three-person crew) per 12,000 population by approximately 4,623 people.
- 3) Response time from Fire Station 12 is typically within 5 minutes.

The SBCFD has also recently implemented a dynamic deployment system for its fire engines, in addition to the traditional static deployment system from fire stations when the station's engine is "in-house". Dynamic deployment allows for the dispatching of engines already on the road to emergency calls rather than dispatching by a station's "first in area", as has been the previous practice. Basically, dynamic deployment uses a Global Positioning System (GPS) to monitor the exact location of each engine in real time. Previously, when an engine was out on routine (non-emergency) activities, such as inspections or training, the engine company was considered "in-service" and its exact location at any given moment in time was not known to County Dispatch. However, with dynamic deployment using the County's GPS, County Dispatch has real-time information on the exact location of each engine at all times and can dispatch the closest, un-engaged engine to an emergency incident, regardless of which fire station's service area the call originates from. This precludes the need for an in-service engine to have extended run times when another fire engine would be closer (G. Fidler; telecom of 8/16/11). The Fire Department has also added a battalion chief as the fourth fire fighter on scene, in order to meet the "two-in-two-out rule."

Police Protection

Police services would be provided by the Santa Barbara County Sheriff's Department under contract to the City. The City of Goleta is divided into 3 patrol units, with 1 police car assigned to each unit. Additional police services are available from Santa Barbara County to supplement City of Goleta police in an emergency. City of Goleta police operate from three locations; the City of Goleta offices, an office located in Old Town on Hollister Avenue, and a third location at the Camino Real Marketplace.

Libraries

Services at the Goleta Public Library are provided by contract with the City of Santa Barbara in a facility owned by the City of Goleta at 500 North Fairview Avenue. The two-acre library site includes a 15,437 square foot building and parking areas. The facility provides services for the City and nearby unincorporated areas. In 2010/2011, library visits totaled 256,996 and circulation was 606,741. As of 2010/2011, about 34,500 library cards were held by area residents. Services are provided by five full-time and two part-time employees.

Schools

Public education services are provided within Goleta and the remainder of the Goleta Valley by the Goleta Union School District (GUSD) and the Santa Barbara Unified School District (SBUSD). The project site is not within any elementary school attendance boundary but La Patera and Hollister Elementary Schools (555 N La Patera Lane and 4950 Anita Lane in the unincorporated County) are the nearest schools to the project site. The associated SBUSD secondary school attendance boundaries include Goleta Valley Junior High (6100 Stow Canyon Road) and Dos Pueblos High School (7266 Alameda Avenue).

Thresholds of Significance

A significant impact on Public Services would be expected to occur if the project resulted in any of the impacts noted in the above checklist. In addition, the City's *Environmental Thresholds and Guidelines Manual* includes thresholds of significance for potential impacts on area schools. Specifically, under these thresholds any project that would generate enough students to generate the need for an additional classroom using current State standards, would be considered to result in a significant impact on area schools. Current State standards for classroom size are as follows:

- 1) Grade K-2—20 students/classroom
- 2) Grade 3-8—29 students/classroom
- 3) Grades 9-12—28 students/classroom

Project Specific Impacts

a) *Fire Protection*

The fire protection services required for the project would include, but would not be limited to, responding to structural fires, emergency medical services, public assistance, and other requests. The project is located within the service area of Fire Station 12 which serves a population that exceeds the NFPA guideline. The 5-minute response guideline would however be met. In the event Fire Station 12 would need back-up, other available engine companies would respond via static and/or dynamic deployment. Therefore the impact of the addition of the project to the service area of Fire Station 12 would be less than significant.

County Fire has determined that the internal access system as currently designed would be adequate for emergency vehicle access to serve the project if the internal roadway is widened from 16' to 20' per the Fire Department approved plans dated February 15, 2011 and on file with Planning and Environmental Services. However, remedying such deficiencies to provide for adequate emergency vehicle access through the project site could result in the encroachment of this roadway into the 25' SPA along the northern property line posing a potentially significant impact on sensitive environmental resources.

Defensible space improvements for all existing and future structures would be required but would not affect any portion of any ESHA area onsite or in close proximity due to the intervening distance that would be maintained between any such ESHA and any existing or future structure. In addition, the existing fire hydrant (#0337) on the opposite side of South Kellogg Avenue from the project

site would have to be upgraded by the applicant to meet current Fire Department standards. Again, such an upgrade would not affect any sensitive environmental resource in the area. As such, provision of adequate defensible space and firefighting improvements to serve the project would be considered less than significant.

Overall, impacts to fire protection services are considered potentially significant until such time as final plans are reviewed and approved that provide for adequate fire and emergency vehicle access per Fire Department standards.

Police Protection

The Santa Barbara County Sheriffs Department provides 24-hour police protection services to the area under contract to the City of Goleta. The City of Goleta is divided into 3 patrol units with 1 police car assigned to each unit. Additional police services are available from Santa Barbara County to supplement the City of Goleta police in an emergency. City of Goleta police operate from three locations: the City of Goleta offices, and office located in Old Town on Hollister Avenue, and a third location at the Camino Real Marketplace. As the project would involve a negligible increase in population on site, demand for police services resulting from the project would not measurably change from baseline levels for the foreseeable future. As such, there would be no need for new facilities or the physical alteration of existing police facilities as a result of project implementation, and as such, no impacts to police services are expected.

Schools

No more than five (5) employees are envisioned to be employed at the facility and none of these employees would live onsite. Since the project would involve a negligible increase in population onsite, either no or a small increase in student enrollment either within the Goleta Union or Santa Barbara School and High School Districts is expected in the foreseeable future. Therefore, there would be no need for new facilities or the physical alteration of existing facilities, and as such, associated impacts on schools are not expected.

Parks

The closest public park/recreational facility to the project site is the Goleta Valley Community Center at 5681 Hollister Avenue, approximately 0.7 miles north and west of the project site via the City street system. As the project would involve a negligible increase in population onsite, the City's existing public parks and recreational facilities would serve the project for the foreseeable future. Therefore, there would be no need for new park facilities or the physical alteration of existing park facilities, and as such, project related impacts on demand for and use of public parks and recreational facilities are not expected.

Other Public Facilities

Demand for other public facilities such as the City's public library would also not exceed existing levels due to the fact that the project would involve a negligible increase in population onsite and for the foreseeable future. Therefore, there would be no need for new facilities or the physical alteration of existing facilities, and as such project related impacts on other public facilities are not expected.

Cumulative Impacts

As the project would not result in any significant impacts on fire or police protection, schools, parks, or other public facilities in the foreseeable, project related contributions to cumulative impacts on such public facilities and services would also be considered less than significant. It should also be noted that this project would be subject to development impact fees for all public services such as fire, police, parks, administrative services, and libraries. Therefore, project related contributions to cumulative impacts on such public facilities and services would be offset by these required payments.

Required Mitigation Measures

1. The permittee shall revise the internal access system to the project that maintains a minimum 16-foot wide, all weather travelway with a four (4) foot wide emergency access shoulder consistent with the redlined plan set marked "Approved, 2/15/11" by the Santa Barbara County Fire Department and on file with Planning and Environmental Services. All such access shall maintain a **minimum 25-foot Stream Protection Buffer (SPA)** from any ESHA onsite as delineated pursuant to the Dudek & Associates biological survey; *Biological Resource Assessment, Concrete Recycling Facility, 903, 905, 907, & 909 South Kellogg Avenue, Goleta, California*, dated July 14, 2010. **Under no circumstances shall any component of this internal access system, including linear curbs and/or any emergency vehicle access shoulder encroach into the SPA.** Therefore, the additional required 4-foot shoulder per the Fire Department approved plans dated February 15, 2011 shall be provided by reducing the width of the northerly stockpile area accordingly. **Plan Requirements and Timing:** All plans submitted for issuance of any LUP, grading, and/or building permit(s) shall be prepared by a licensed civil engineer and shall ensure that all internal vehicular access throughout the project site shall be consistent with the redlined plans marked "Approved, 2/15/11" by the Santa Barbara County Fire Department. All such access shall maintain a 25-foot minimum SPA from any ESHA onsite. Plans shall be submitted to the Santa Barbara County Fire Department for their review and approval. Upon written approval from Santa Barbara County Fire and prior to issuance of any LUP for the project, the permittee shall have the SPA along the northern property line established in the field by a California licensed surveyor and that surveyed line confirmed by the project biologist who prepared the SPA delineation (Dudek, & Associates, July 14, 2010).

Monitoring: City staff shall verify compliance with this requirement prior to the issuance of any LUP, grading, and/or building permit(s) for the project. City staff shall monitor construction of the internal road system to verify compliance during construction of the project. Prior to any final inspection by City staff, the permittee shall have the access system inspected and approved by the Santa Barbara County Fire Department.

Residual Impacts

Residual project related impacts on public services and facilities would be less than significant.

RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			■		
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				■	

Existing Setting

The Old Town Goleta neighborhood has a population of over 4,000 people with a 0.14 acre pocket park on Nectarine Avenue north of Hollister Avenue and a 1.48 acre park located on Armitos east of South Kellogg Avenue. Additional active recreational facilities available to residents and employees of Old Town include playing fields at St. Raphael's School and the Goleta Boys and Girls Club/Community Center, both east of the project site on Hollister Avenue. In addition, the City's 10 public parks, four private parks, and 20 public open space areas comprise a total of 523 acres, which equate to approximately 18 acres/1,000 residents. The two larger City-owned regional open space preserves, the Sperling Preserve/Ellwood Mesa and Lake Los Carneros Natural and Historical Preserve collectively account for 363 acres of that total. Approximately 40% of the City's two miles of Pacific shoreline is held in City ownership. Together with the neighborhood open space areas, these preserves provide many opportunities for passive recreation activities and enjoyment of natural areas. Areas specifically developed for active recreational uses however are less abundant with about three (3) acres of land/1,000 residents. The City's single recreation center, the Goleta Valley Community Center, is insufficient to fulfill all the needs of community groups and residents. Although privately owned and managed, Girsh Park provides much-needed facilities for active recreation but there remains a shortage of public facilities for active recreation such as sports fields, tennis courts, swimming pools, and dedicated trails.

Thresholds of Significance

A significant impact on recreation would be expected to occur if the project resulted in any of the impacts noted in the above checklist.

Project Specific Impacts

a,b) The addition of five new employees to the City’s workforce as a result of the recycling facility would not generate any new, significant demand and/or use of existing neighborhood and regional parks or recreational facilities that could lead to substantial physical deterioration of such community resources. No recreational facilities are included as part of the project that could affect sensitive environmental resources. Such impacts are considered less than significant or non-existent.

Cumulative Impacts

Project contributions to cumulative impacts on recreation within the City would be addressed through the payment of the required parks/recreation DIFs prior to occupancy clearance.

Required/Recommended Mitigation Measures

Other than the required payment of parks/recreation DIFs, no mitigation is recommended or required.

Residual Impacts

None.

TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			■		
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?			■		
c. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			■		

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
d. Conflict with and applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			■		
e. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			■		
f. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			■		
g. Result in inadequate emergency access?		■			
h. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?		■			

Existing Setting

Until the Fowler Road Extension is completed connecting South Kellogg Avenue to Fairview Avenue, access to the site would be provided by South Kellogg Avenue and Hollister Avenue. Upon completion of the Fowler Road Extension, access from Fairview Avenue would also be possible. South Kellogg Avenue is considered a “Minor Arterial” under the Transportation Element of the GP/CLUP while Hollister and Fairview Avenues are considered “Major Arterials.” Although no roadway traffic volumes are noted for South Kellogg in the Transportation Element of the GP/CLUP, existing traffic volumes on Hollister between South Patterson Road and Fairview Avenue are estimated at about 17,800 average daily trips (ADTs) while traffic volumes on Hollister Avenue west of Fairview Avenue are estimated at 21,700 ADT (Table 7-2, Transportation Element, City of Goleta GP/CLUP). As major arterials, acceptable traffic volumes on these to major arterials are 34,000 ADT (Table 7-2, Transportation Element, City of Goleta GP/CLUP). As access from Fairview Avenue is not yet available, the Hollister/South Kellogg and Hollister/State Route 217 intersections would experience the majority of project generated traffic. The existing level of service (LOS) for Hollister/Kellogg as measured by volume/capacity is LOC C (V/C = 0.71) while Hollister/SR 217 southbound ramps are at LOS C (V/C = 0.79) and the Hollister/217 northbound ramps operate at LOS B (V/C = 0.68). As discussed in the Hazards and Hazardous Materials section of this document, the northern ⅔ of the project site lies within the Clear Zone for Runway 7/25 at the Santa Barbara Municipal Airport.

Thresholds of Significance

A significant project generated traffic impact would be expected to occur if the project resulted in any of the impacts noted in the above checklist. Additional thresholds of significance are set forth in the City's *Environmental Thresholds and Guidelines Manual* and include the following:

- 1) The addition of project traffic to an intersection increases the volume to capacity (V/C) ratio by the value provided below or sends at least 5, 10, or 15 trips to intersections operating at LOS F, E or D.

LEVEL OF SERVICE (including the project)	INCREASE IN V/C (greater than)
A	.20
B	.15
C	.10
OR THE ADDITION OF	
D	15 trips
E	10 trips
F	5 trips

- 2) Project access to a major road or arterial road would require a driveway that would create an unsafe situation or a new traffic signal or major revisions to an existing traffic signal.
- 3) Project adds traffic to a roadway that has design features (e.g. narrow width, road side ditches, sharp curves, poor sight distance, inadequate pavement structure) or receives use which would be incompatible with a substantial increase in traffic (e.g. rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use, etc.) that will become potential safety problems with the addition of project or cumulative traffic.
- 4) Project traffic would utilize a substantial portion of an intersection(s) capacity where the intersection is currently operating at acceptable levels of service (A-C) but with cumulative traffic would degrade to or approach LOS D (V/C 0.81) or lower. Substantial is defined as a minimum change of 0.03 for intersections which would operate from 0.80 to 0.85 and a change of 0.02 for intersections which would operate from 0.86 to 0.90, and 0.01 for intersections operating at anything lower.

Project Specific Impacts

- a-d) The applicant anticipates that up to five employees would be needed to staff the recycling facility and that truck trips delivering raw material and picking up finished road base would average three (3) trucks/day transporting raw material to the site and three (3) trucks/day hauling finished road base to construction sites for a total of 22 new ADTs generated by the project. As the existing traffic volumes on all City streets within the project's travelshed are currently well below acceptable capacity limits (Table 7-2, Transportation Element, GP/CLUP), including Hollister Avenue west of South Patterson Avenue, existing + project

traffic volumes on Hollister Avenue in particular and the City's street network in this area of Old Town in general would not result in a significant impact on roadway operations.

As noted above, the primary City intersections within the project's travelshed all operate at LOS C or better. Anticipated PM peak hour traffic volumes generated by the recycling facility are estimated at five (5) outbound employee trips given that facility operations would cease at 4:00 PM (ATE, *Traffic Analysis for the United Concrete Recycling Center, Goleta, CA*, dated April 12, 2011). Therefore, as project generated peak hour vehicular trips would not reach any threshold for a significant intersection operations impact, the impact of project generated peak hour traffic on City intersections within the project's travelshed are also considered less than significant.

- e) As noted in the Hazards and Hazardous Materials and Land Use and Planning sections of this document, the recycling facility, subject to height restrictions that are intended to keep all facility operations below a height of 34 feet above msl, could be considered compatible with Airport operations and safety given the criteria set forth in the ALUP for new development in the Clear Zone.
- f) Facility operations would involve large, 10-wheel dump trucks and tractor/trailer haulers to transport raw material to the facility and finished product from the site. Access to and from the site would be provided by a paved entrance off South Kellogg Avenue at a distance of approximately 160 feet from the intersection of South Kellogg Avenue and Technology Drive. Although neither street has a posted speed limit, the default speed limit for commercial/industrial areas is 25 MPH. Given the alignment of South Kellogg (due east/west), distance from the project entrance/exit from the intersection of Technology Drive (160+ feet), and the default speed limit of 25 MPH, project implementation, including the use of large dump trucks and tractor/trailer material haulers would not result in the creation of a potentially significant traffic safety impact.
- g) Please refer to Public Services, Fire Protection section of this document.
- h) Although the recycling facility would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, the project as designed does not promote alternative transportation through the inclusion of bicycle facilities onsite. The lack of planned bike racks to accommodate employees who choose to commute via bicycle is considered potentially significant.

Cumulative Impacts

- a-d) As noted above, access to the site would be provided by South Kellogg and Hollister Avenues and ultimately US Highway 101 via the Hollister/State Route 217 interchange. Even without planned improvements to Hollister Avenue west of South Patterson Avenue, projected cumulative traffic volumes at GP/CLUP buildout are only estimated at 23,500 ADT, well below the acceptable capacity of 34,000 ADT. Intersection operations at South Kellogg/Hollister, as well as at the Hollister SR 217 southbound ramps are projected to degrade to LOS E under the

cumulative GP/CLUP buildout scenario without planned improvements (Table 7-1, Transportation Element, GP/CLUP). However, with implementation of planned improvements as identified in the GP/CLUP, cumulative intersection operations at these two intersections are projected to improve to LOS C. The project's required payment of transportation DIFs to the City is considered adequate mitigation for the project's contribution to the overall cumulative transportation impacts already identified in the GP/CLUP.

Required Mitigation Measures

The following mitigation measure is required to ensure project consistency with City policies promoting alternative transportation modes.

1. The permittee shall provide for at least one bicycle rack onsite to facilitate bicycle commuting. **Plan Requirements and Timing:** City staff shall verify the inclusion of at least one bicycle rack onsite on all plans submitted for LUP clearance.

Monitoring: City staff shall verify compliance prior to LUP issuance.

Refer also to Public Services, Fire Protection Mitigation Measure #1 for required mitigation regarding emergency access.

Residual Impact

With implementation of this mitigation measure and payment of required transportation DIFs, residual project specific as well as residual project contributions to cumulative traffic impacts would be less than significant.

UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?		■			
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		■			
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		■			

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?		■			
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?		■			
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			■		
g. Comply with federal, state, and local statutes and regulations related to solid waste?			■		

Existing Setting

Sewage disposal service for the recycling facility would be provided by the Goleta Sanitary District (GSD) and water service would be provided by the Goleta Water District (GWD). Solid waste collection and disposal would be provided by Allied Waste Services. Solid waste collected from the facility would be transported by the Santa Barbara County Public Works Department 24 miles to the west to the Tajiguas landfill which is operated by the County. Stormwater runoff from the project site either sheet flows into Old San Jose Creek to the west or to an existing drainage swale along the northern property line of the subject property that is tributary to Old San Jose Creek.

Thresholds of Significance

A significant impact on utilities and service systems would be expected to occur if the project resulted in any of the impacts noted in the above checklist. In addition, under the City's *Environmental Thresholds and Guidelines Manual*, a project that would generate 196 tons of solid waste/year, after receiving a 50% credit for source reduction, recycling, and composting, would result in a project specific, significant impact on the City's solid waste stream. Any project generating 40 tons/year, after receiving a 50% credit for source reduction, recycling, and composting would be considered to make an adverse contribution to cumulative impacts to the City's solid waste stream.

Project Specific Impacts

a,b,e) Sanitary sewer service for both the sales-and equipment garage would be provided via connection to the sewer collection system of the GSD. Currently, the GSD's maximum daily capacity portion of the full treatment capacity at the District's main treatment plant on William Moffett Place (9.72 mgd) is 4.65 million gallons/day (mgd) with a NPDES permit cap of 3.66 mgd and a current inflow of 2.54 mgd (City of Goleta *General Plan/Coastal Land Use Plan EIR*, September, 2006). Per the GSD, effluent generation for commercial uses is based on a

- demand factor of 100 gallons/day/1,000 square feet of habitable space. Given the gross floor area of all habitable space of this project (2,310 ft²), estimated daily effluent generation from the project would be 230 gallons/day. This represents 0.02% of the GSD's remaining permitted capacity. However, even though project generated effluent would represent a de minimis increase in demand for wastewater treatment, until a formal commitment from the GSD is obtained by the applicant, project generated demand for wastewater treatment would be considered potentially significant.
- c) Currently there are no drainage improvements onsite. Under the project, the site would be elevated as much as four feet with 12,000 cubic yards of fill and sloped to a central catch basin that would discharge into a "rain garden" detention basin along Old San Jose Creek or to the north and east so that the remaining stormwater runoff would flow to another catch basin for discharge into the drainage facilities of South Kellogg Avenue. As no details on BMPs to be incorporated into this system have been provided as of yet (e.g. trash collection and petroleum product filtration at the catch basin), or drainage calculations demonstrating that the "rain garden" is adequately sized to ensure that the post-development discharge does not exceed the pre-development condition, project impacts on sensitive environmental resources involving both the quality and quantity of stormwater runoff discharged from the site would be considered potentially significant. Mitigation measures for such impacts are identified in the Hydrology and Water Quality discussion above.
- d) Water to serve the project would be provided by the GWD. Water demand would involve three factors, domestic use in the sales-office and equipment garage, landscape and riparian revegetation/restoration irrigation, and use of water to control fugitive dust. Based on the water duty factors in the City's adopted *Environmental Thresholds and Guidelines Manual*, water demand generated by domestic use and irrigation of both landscaping and the 25-foot SPA native revegetation/restoration would be estimated at 1.38 acre feet/year (AFY). Water for dust control for the crushing system is estimated at a maximum of 10-gallons/minute (gpm) of operation (telecommunique from CEC Corporation, manufacturer of the recycling system, 8/6/10). Under a worst case scenario of crusher operations eight hours/day, three days/week (Telecommunique, Al Rodriguez, United Paving/project applicant, 8/6/10), water consumption for dust suppression would be estimated at 2.3 AFY. Total water demand for the project is therefore estimated at 3.68 AFY.

The GWD operates under the Wright Judgment that prohibits overdrafting of the Goleta Groundwater Basin (GGWB). The District draws its water supply from Lake Cachuma (9,322 acre feet/year or AFY), the State Water Project (4,500 AFY), the GGWB (2,350 AFY), and wastewater reclamation (3,000 AFY) for a total yearly supply of 19,172 AFY for a normal rainfall year (*Goleta Water District Water Supply Assessment*, May 22, 2008). Average current demand for GWD water (2007) is 15,554 AFY (*GWD Water Assessment*, May 22, 2008) leaving a remaining, unused water supply at this time of 3,618 AFY in a normal rainfall year. The anticipated 1.41 AFY increase in water demand resulting from implementation of the project represents 0.1% of this currently available supply over current yearly demand for District water. While the project represents a de

minimis increase in water demand, until an *Intent to Serve* letter is issued by the GWD, provision of an adequate water supply for the project is not guaranteed. Therefore, until a *Can and Will Serve* letter for the project is issued by the GWD, project impacts on the local water supply would be considered potentially significant.

- f,g) Solid waste generation by the facility would occur as a result of the sales-office and the equipment garage. Using the solid waste generation factors for manufacturing uses from the City's adopted *Environmental Guidelines and Thresholds Manual*, solid waste generated by the recycling facility, prior to a 50% credit for source reduction and recycling, is estimated 6.01 tons/year. This anticipated volume of solid waste is well below both the project specific, potentially significant threshold of 196 tons/year as well as the cumulative threshold of 40 tons/year for an adverse contribution to cumulative solid waste flow into the Tajiguas Landfill. Therefore, solid waste generation for the recycling facility, both from a project specific perspective as well as project contributions to cumulative impacts on landfill capacity at Tajiguas and the County's ability to handle its long-term solid waste stream are considered less than significant.

As a concrete recycling facility, the project would divert substantial volumes of concrete spoil from the Tajiguas landfill or other receiving sites. Currently, it is estimated that concrete spoil accounts for 22% of the States solid waste stream (Cal Recycle; *Construction and Demolition Recycling, Recycled Aggregate*, <http://www.calrecycle.ca.gov/ConDemo/Aggregate>). Applying this rate to Santa Barbara County's landfill operations and assuming that the recycling facility diverts only a portion of this waste stream, overall project impacts on solid waste generation within the County would be considered beneficial.

Cumulative Impacts

Project contributions to cumulative impacts on utilities and service systems on the South Coast involving sewer and water demand as well as drainage systems would also be considered potentially significant. The project's contribution to the cumulative solid waste stream into the County's Tajiguas landfill as a result of the diversion of concrete spoil, which could account for as much as 22% of that waste stream, would be considered beneficial.

Required Mitigation Measures

1. The permittee shall obtain and submit to the City a *Can and Will Serve* letter for the project or other proof of service from the Goleta Water District (GWD). **Plan Requirements and Timing:** The required GWD *Can and Will Serve* letter or connection permit waiver shall be submitted to the City prior to LUP issuance.

Monitoring: City staff shall verify compliance prior to LUP issuance.

2. The permittee shall obtain and submit to the City a *Sewer Connection Permit* or other proof of service from the Goleta Sanitary District (GSD). **Plan Requirements and Timing:** The required GSD *Sewer Connection Permit* shall be submitted to the City prior to LUP issuance.

Monitoring: City staff shall verify compliance prior to LUP issuance.

3. The final landscape plan shall include measures to minimize outdoor water use. **Plan Requirements:** The following measures shall be implemented in the final landscape plan:

- a) The final landscaping shall use native and/or drought tolerant species;
- b) Drip irrigation or other water-conserving irrigation shall be installed;
- c) Plant material shall be grouped by water needs;
- d) Turf shall constitute less than 20% of the total landscaped area if proposed under the final landscape plan;
- e) No turf shall be allowed on slopes of over 4%;
- f) Extensive mulching (2" minimum) shall be used in all landscaped areas to improve the water holding capacity of the soil by reducing evaporation and soil compaction; and,
- g) Soil moisture sensing devices shall be installed to prevent unnecessary irrigation.

Timing: The final landscape plan shall include these requirements and shall be reviewed and approved by City staff and DRB. The permittee shall implement all elements of the final landscape plan prior to final inspection.

Monitoring: Prior to final inspection, City staff shall verify installation according to plan.

4. Building plans shall include measures to minimize indoor water use. **Plan Requirements:** The following measures shall be implemented in project building plans:

- a) All hot water lines shall be insulated;
- b) Re-circulating, point-of-use, or on-demand water heaters shall be installed;
- c) Self regenerating water softening shall be prohibited in all structures; and
- d) Public lavatories and drinking fountains shall be equipped with self-closing valves.

Timing: Project building plans shall include these requirements. Indoor water conserving measures shall be implemented prior to occupancy clearance.

Monitoring: Prior to final inspection, City staff shall inspect to verify installation according to plan.

5. Reclaimed water, if available, shall be used for all dust suppression activities during grading and construction for the project. **Plan Requirements and Timing:** This measure shall be included as a note on all plan submitted for any LUP, grading, or demolition permit. Prior to the commencement of earth movement, the permittee shall submit to the City an agreement/contract with a company providing reclaimed water stating that reclaimed water shall be supplied

to the project site during all ground disturbances when dust suppression is required if available from the GWD.

Monitoring: City staff shall field inspect to verify compliance.

6. Excess construction materials shall be separated onsite for reuse/recycling or proper disposal (e.g., concrete and asphalt). During grading and construction, separate bins for recycling of construction materials and brush shall be provided onsite. **Plan Requirements and Timing:** This requirement shall be printed on the LUP and all the grading and building plans. Materials shall be recycled as necessary throughout construction. All materials shall be recycled prior to occupancy clearance.

Monitoring: City staff shall verify compliance through all phases of permitting and construction.

Recommended Mitigation Measure

7. The permittee shall develop and implement a Solid Waste Management Program. The program shall identify the amount of waste generation estimated during processing of the project. The program shall include the following measures, but is not limited to those measures:
- a) Provision of a recyclable materials storage area within the project site that is approved by the waste hauler serving the site.
 - b) Development of a Source Reduction Plan (SRP), describing the recommended program(s) and the estimated reduction of the solid waste disposed by the project. For example, the SRP may include a description of how fill will be used on the construction site, instead of landfilling, or a detailed set of office procedures such as use of duplex copy machines and purchase of office supplies with recycled content.
 - c) Implementation of a program to purchase materials that have recycled content for project construction and/or operation (i.e., plastic lumber, office supplies, etc.). The program could include requesting suppliers to show recycled materials content. To ensure compliance, the permittee shall develop an integrated solid waste management program, including recommended source reduction, recycling, composting programs, and/or a combination of such programs.

Plan Requirement and Timing: The permittee shall submit a Solid Waste Management Program to the City for review and approval prior to LUP issuance. All program components shall be implemented prior to occupancy clearance and throughout the life of the project.

Monitoring: City staff shall verify compliance prior to LUP issuance as well as site inspect during construction and prior to occupancy to ensure solid waste management components are established and implemented.

Residual Impacts

With implementation of these mitigation measures, residual project specific as well as residual project contributions to cumulative impacts on utilities and services would be either less than significant, or for solid waste generation, beneficial.

MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	See Prior Document
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?		■			
b. Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?		■			
c. Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.		■			

15. PREPARERS OF THE INITIAL STUDY/DRAFT MITIGATED NEGATIVE DECLARATION, CONTACTS, AND REFERENCES

This document was prepared by City of Goleta Planning and Environmental Services Department staff.

Contributors and Contacts: The following individuals participated in the analysis of the project or otherwise furnished information vital to preparation of this document.

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Public Agencies

Captain Glenn Fidler, Santa Barbara County Fire Department
Molly Pearson, Santa Barbara County Air Pollution Control District
Eric Gage, Santa Barbara County Air Pollution Control District

References: The following documents were consulted during preparation of this document and form the basis of the relevant findings and conclusions:

ATE, *Traffic Analysis for the United Concrete Recycling Center, Goleta, CA*, dated April 12, 2011.

Bay Area Air Quality Management District, *Resolution No. 2010-06*, June 2010.

Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, 2010.

California Air Resources Board (CARB), *Greenhouse Gas Reporting in a Cap-and-Trade Program-Background Information*, 2009.

<http://www.arb.ca.gov/cc/capandtrade/meetings/021809/summary.pdf>

California Air Pollution Control Officers Association (CAPCOA) Technical Advisory; *CEQA and Climate Change: Addressing Climate Change Through the California Environmental Quality Act (CEQA) Review* dated June 19, 2008, available at the OPR website, www.opr.ca.gov.

California Air Resources Board (CARB); *Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act, Preliminary Draft Staff Proposal*, October 24, 2008

Cal Recycle; *Construction and Demolition Recycling, Recycled Aggregate*, <http://www.calrecycle.ca.gov/ConDemo/Aggregate>

CAPCOA; *CEQA & Climate Change*, January 2008

California Energy Commission (CEC), *Rules of Practice and Procedure and Power Plant site Certification Regulations (CEC 140-2006-002)*, 2006.

City of Goleta, *Environmental Thresholds and Guidelines Manual*, 2003

City of Goleta, *General Plan/Coastal Land Use Plan*, 2006

City of Goleta *General Plan/Coastal Land Use Plan EIR*, September, 2006

City of Goleta *Stormwater Management Plan*, August, 2003

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Custom Environmental Services (CES), *Tennant Environmental Audit, 903/905 South Kellogg, Goleta, California*, October 13, 2004

Custom Environmental Services (CES), *Tennant Environmental Audit, 903/905 South Kellogg, Goleta, California*, May 29, 2001

Construction Equipment Company (CEC), Construction Equipment Specifications, <http://ceccrushers.com/index.htm>

Department of Justice, Office of the California Attorney General; *Global Warming Measure*, December 9, 2008

Dudek, *Biological Resource Assessment, Concrete Recycling Facility, 903, 905, 907, and 909 South Kellogg Avenue, Goleta California, APN 071-190-034*, June 29, 2010

Dudek, *Archaeological Resources Assessment, Concrete Recycling Facility, 903, 905, 907, and 909 South Kellogg Avenue, Goleta, California*, June 18, 2010

Federal Emergency Management Agency, Flood Insurance Rate Map Santa Barbara County, California (Panel 1362 of 1835; Map Number 06083C1362F), September 30, 2005.

Goleta Water District, *Water Supply Assessment*, May 22, 2008

Governor Arnold Schwarzenegger; *California Executive Order S-3-05*, 2005

Governor Arnold Schwarzenegger, Assembly Bill 32, *The California Global Warming Solutions Act of 2006, Assembly Bill 32*, Health and Safety Code Section 38500 et. seq.

Governor's Office of Planning and Research; *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act Review*, June 2008

Governor's Office of Planning and Research; *OPR Proposed CEQA Guidelines Amendments*, April 2009

Governor's Office of Planning and Research; *Senate Bill 97*, 2007

ICF Jones and Stokes; *Goleta General Plan/Coastal Land Use Plan Supplemental Environmental Impact Report*, July 2009

Intergovernmental Panel on Climate Change (IPCC). *National Greenhouse Gas Inventories Programme*, 2008. <http://www.ipcc-nggip.iges.or.jp/>

Montreal Protocol: <http://www.unep.org/ozone/pdfs/montreal-protocol2000.pdf>

Sacramento Metropolitan Air Quality Management District; *CEQA Guide*, June 2009

Santa Barbara County *Airport Land Use Plan*, Revised 1996

Santa Barbara County Air Pollution Control District (SBCAPCD), *2010 Clean Air Plan*

Final Mitigated Negative Declaration
South Kellogg Building Material/Recycling Facility; 09-133-DP
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Santa Barbara County Air Pollution Control District (SBCAPCD), *Scope and Content of Air Quality Sections in Environmental Documents*, June 2010

Santa Barbara County, *Goleta Old Town Revitalization Plan*, June 1998

Santa Barbara County Planning and Development Department, memorandum entitled *Support for Use of Bay Area Air Quality Management District Greenhouse Gas Emissions Standards*, 2010.

State of California, Air Resources Board, *Preliminary Draft Staff Proposal Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act*, 2008:
<http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf>

State of California, California Energy Commission: <http://www.energy.ca.gov/>
URS Corporation, Cultural Resources Assessment of Kellogg Avenue Site (APN 071-190-034), November 6, 2009

Seinfeld and Pandis, *Atmospheric Chemistry and Physics: from Air Pollution to Climate Change*, Wiley, 1998.

URS Corporation, *Limited Phase II Site Assessment, 903/905 South Kellogg Avenue, Goleta, California*, July 1, 2010

URS Corporation, *Review of Biological Resources for Kellogg Avenue Site (APN 071-190-034)*, November 4, 2009

US Department of Energy, Oak Ridge National Laboratory, Carbon Dioxide Information Analysis Center, *Global Fossil Fuel CO₂ Emissions, 2003*

US Soil Conservation Service, *Soil Survey of Santa Barbara County, South Coastal Part*

ATTACHMENTS:

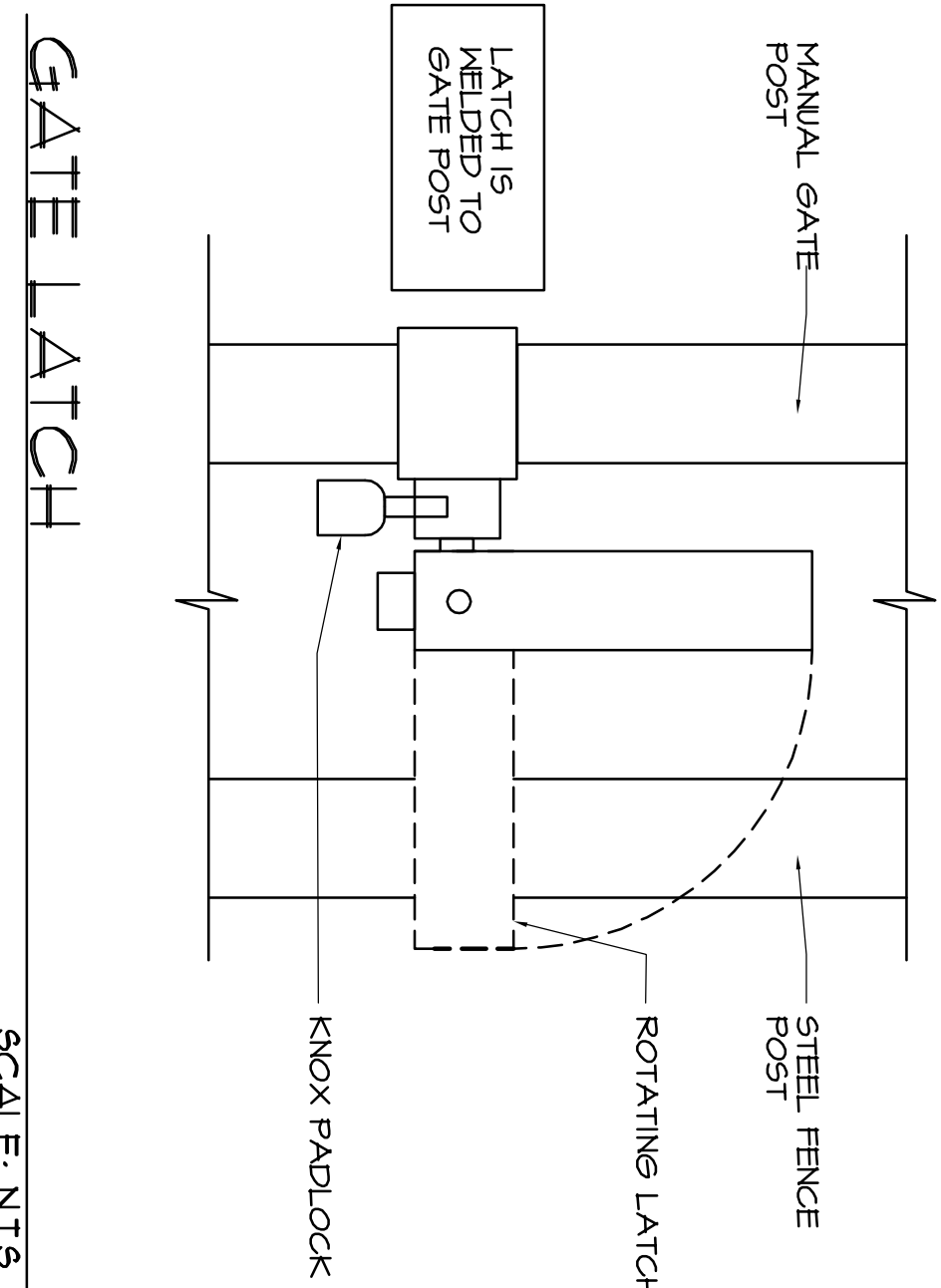
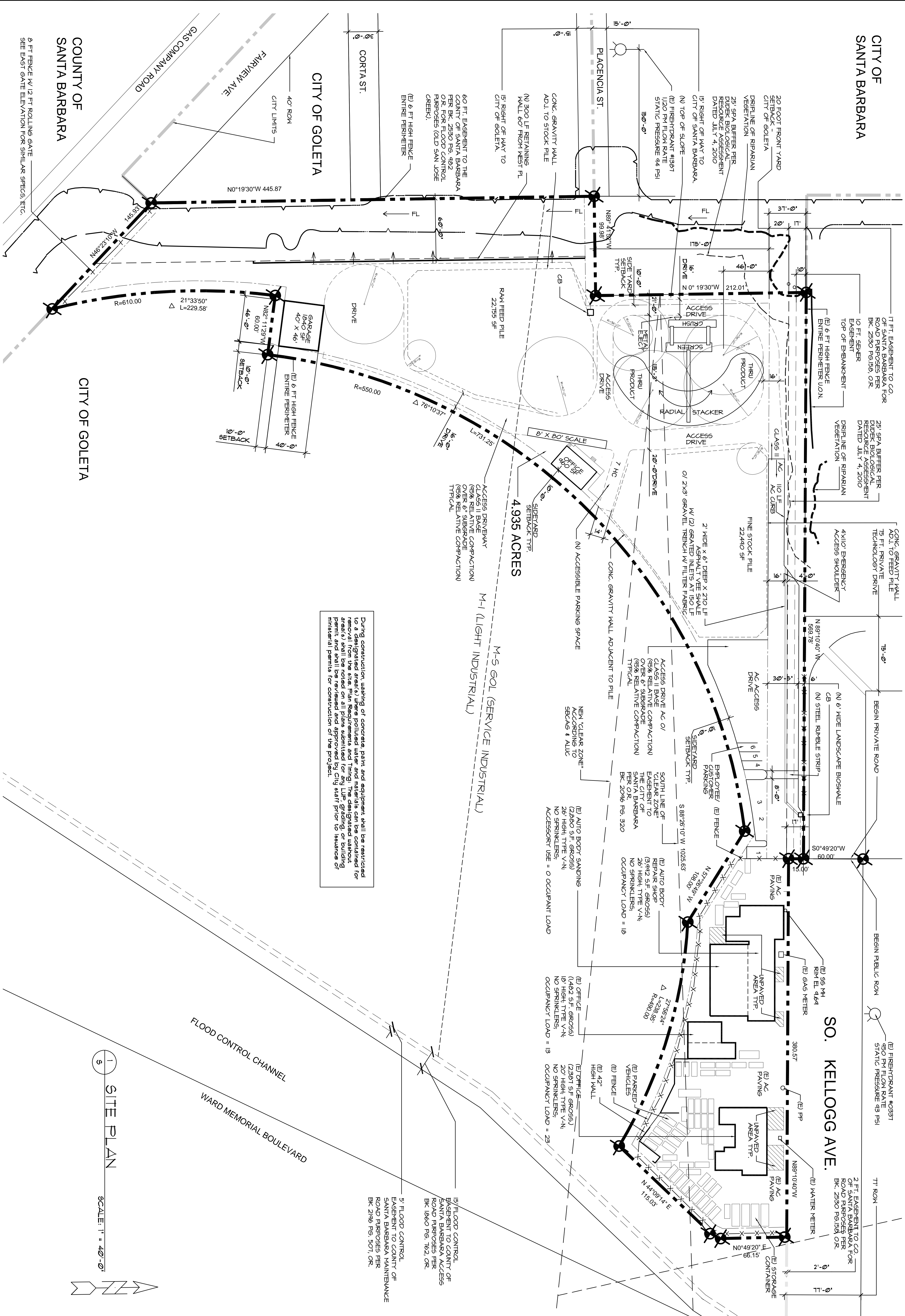
1. Project Plans (8½" x 11" reductions)
2. Figure 1, Biological Resource Setback Recommendations
3. URBEMIS 2007 Version 9.2.4 Summer Emissions Summary
4. Air Pollution Emissions From APCD ATC Permit Application 13322
5. ALUC Final Action Letter dated August 22, 2011
6. DMND Comment Letters

ATTACHMENT 1
Project Plans (8½" x 11" reductions)

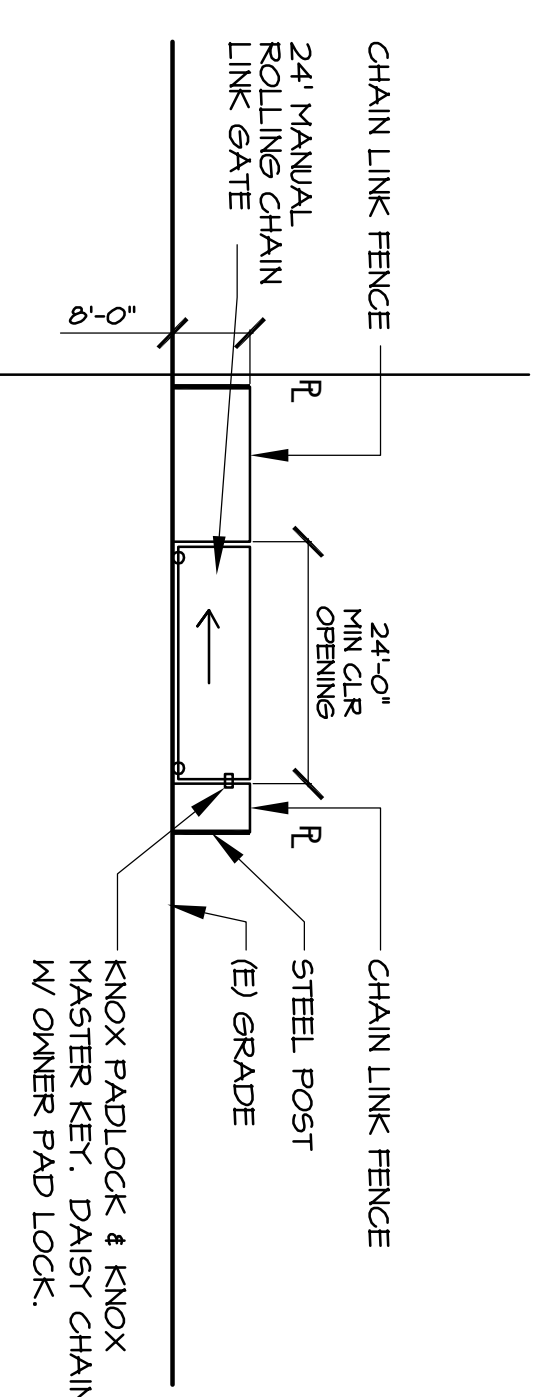
CITY OF
SANTA BARBARA

COUNTY OF
SANTA BARBARA

CITY OF GOLETA



SCALE: 1/8" = 1'-0"



SCALE: 1/8" = 1'-0"

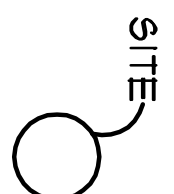
KEY TO PRIVATE PADLOCK TO BE LOCATED IN KNOX KEY BOX. LOCATION APPROVED BY SPD INSPECTOR/HANDLER

KNOX SHROUDED ALL WEATHER PADLOCK (PART 311)

During construction, watering of concrete, paint and equipment shall be restricted to a designated area. Used potting water and materials can be contained for reuse. All materials shall be stored in a designated area. All site grading or building permit shall be noted on all plans submitted for City staff prior to issuance of material permits for construction of the project.

1 SITE PLAN SCALE: 1" = 40'-0"

VICINITY MAP



VICINITY MAP N125

SHEET INDEX

- 1 SITE PLAN
- 2 PROPOSED BUILDING PLANS/ELEVATIONS
- 3 GRADING PLAN
- 4 TOPOGRAPHIC SURVEY

PROJECT DATA

PROJECT ADDRESS: 409 SOUTH KELLOGG AVE GOLETA, CA 93111
 OWNER: KELLOGG AVENUE LLC
 ARCHITECT: PETER WALKER HUNT AIA
 APN: 11-190-34
 ZONE: M-1-S-GOL-17-1
 GENERAL PLAN DESIGNATION: BUSINESS & INDUSTRIAL
 PERMITTED USE: GENERAL COMMERCIAL - SERVICE 7500 SF GROSS REQUIRED PROVIDED

LEGEND

- FL FIRE HYDRANT
- FP FLOOR POLE
- SS SANITARY SEWER
- PH MAN HOLE
- EL FLOW
- EX EXISTING
- TAC TOP OF ASPHALTIC CONCRETE
- TGB TOP OF CATCH BASIN
- FG FINISH GRADE

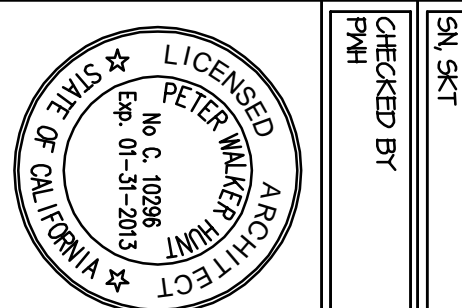
CONCRETE RECYCLING CENTER

903, 905, 907, & 909 SOUTH KELLOGG AVE. GOLETA, CALIFORNIA 931117

PETER WALKER HUNT, AIA

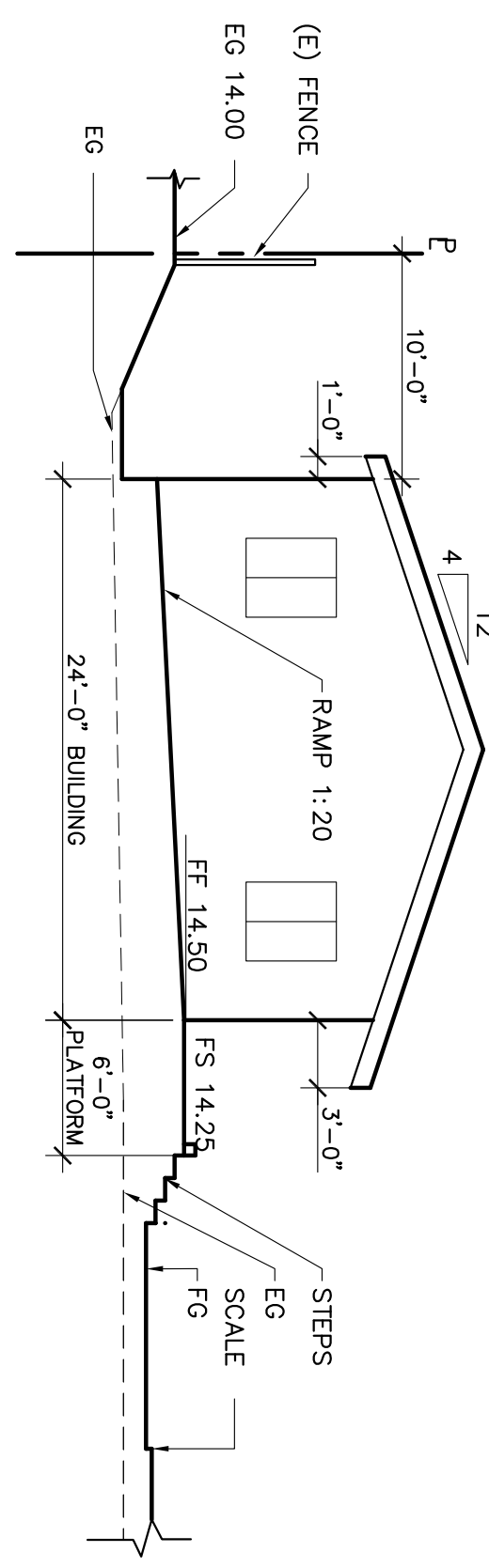
ARCHITECT

1303 B STATE STREET - P.O. BOX 92045 - SANTA BARBARA, CALIFORNIA 93190
 TELEPHONE: 805.965.5600 WEB: www.peterwalkerhunt.com

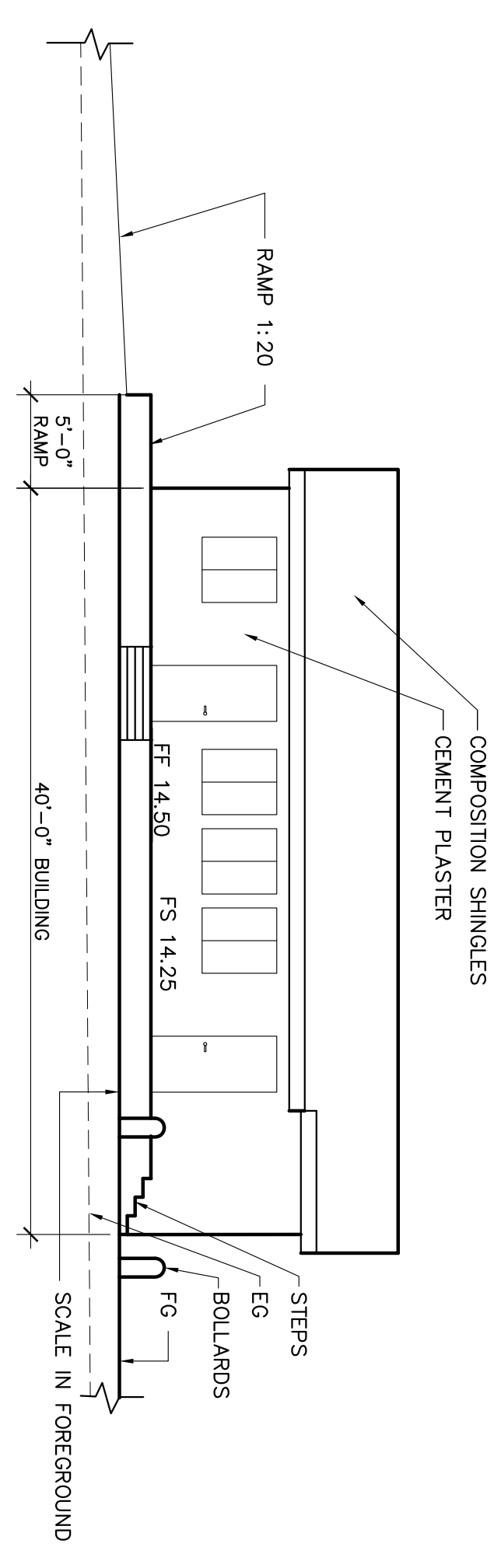


CITY OF GOLETA
 CASE NO. 09-133-DP

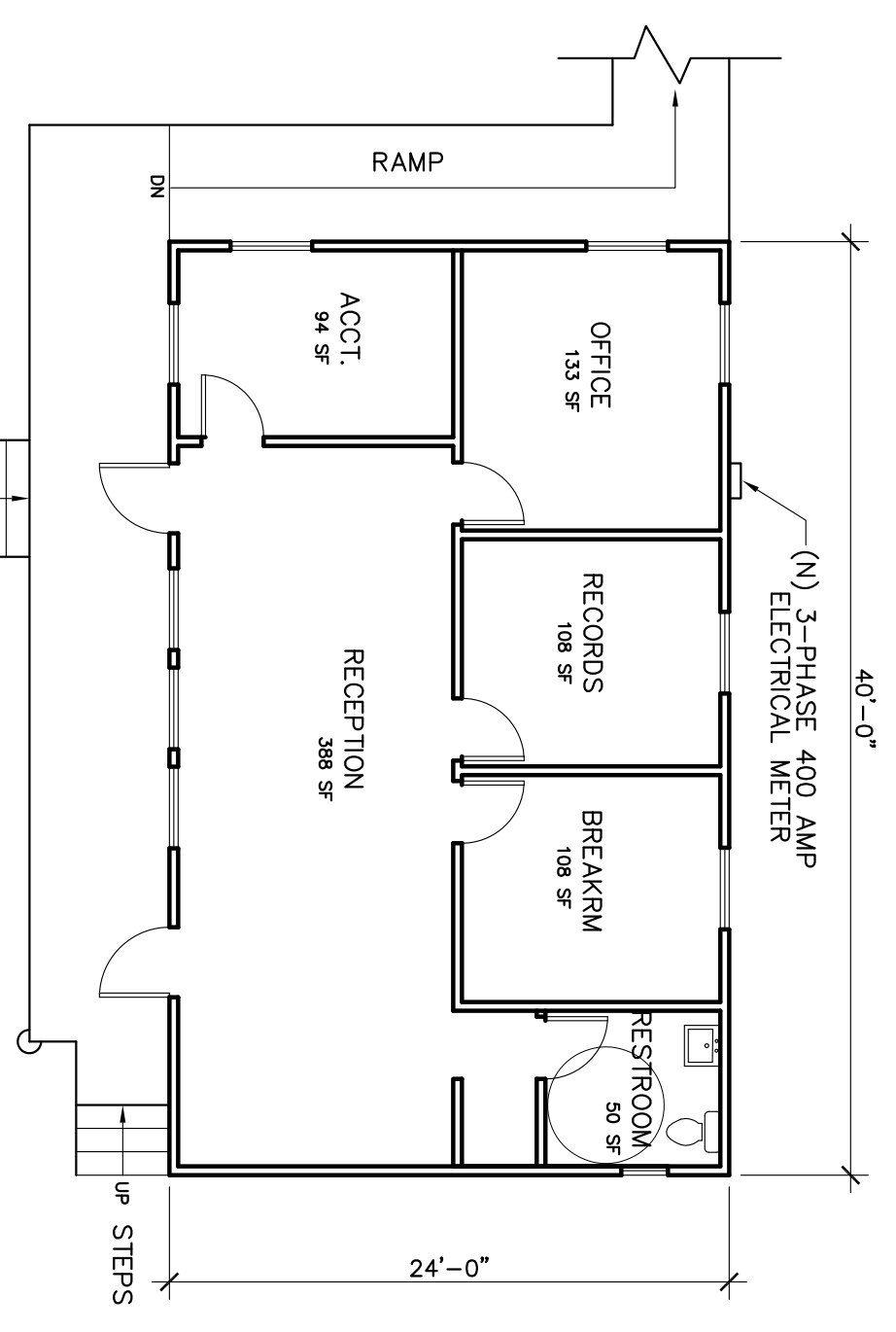
PROJECT NO. 09-02
 REV. DATE MAY 13, 2011
 DRAWN BY SK/KIT
 CHECKED BY
 SHEET NO. S



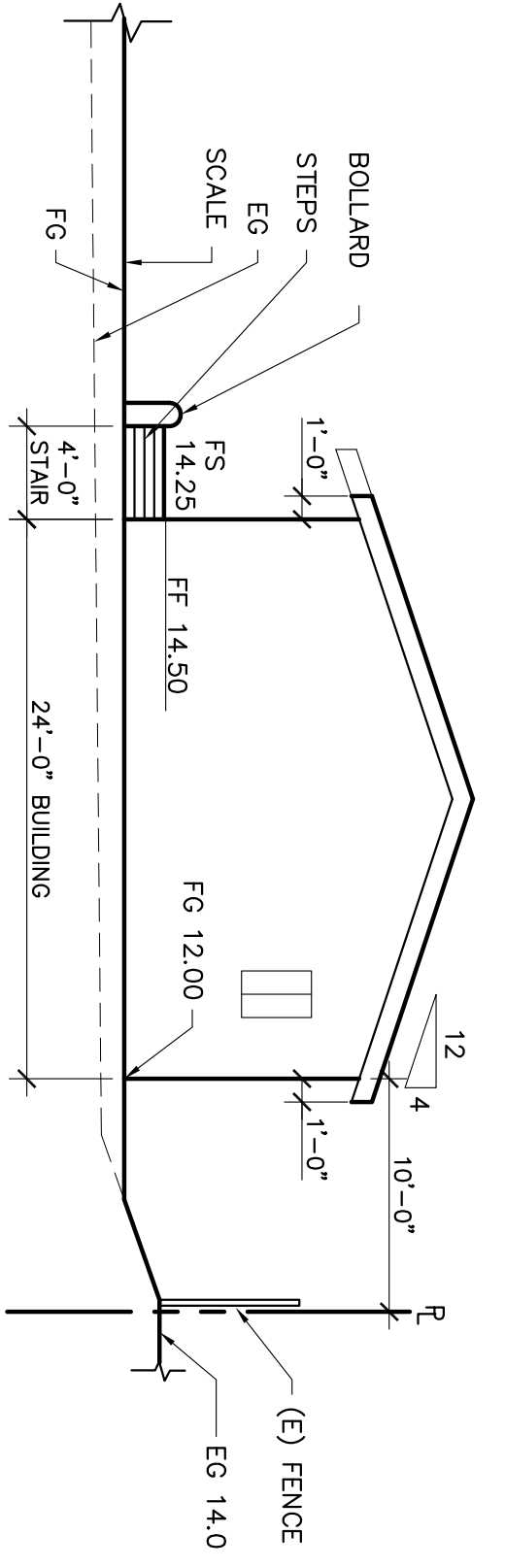
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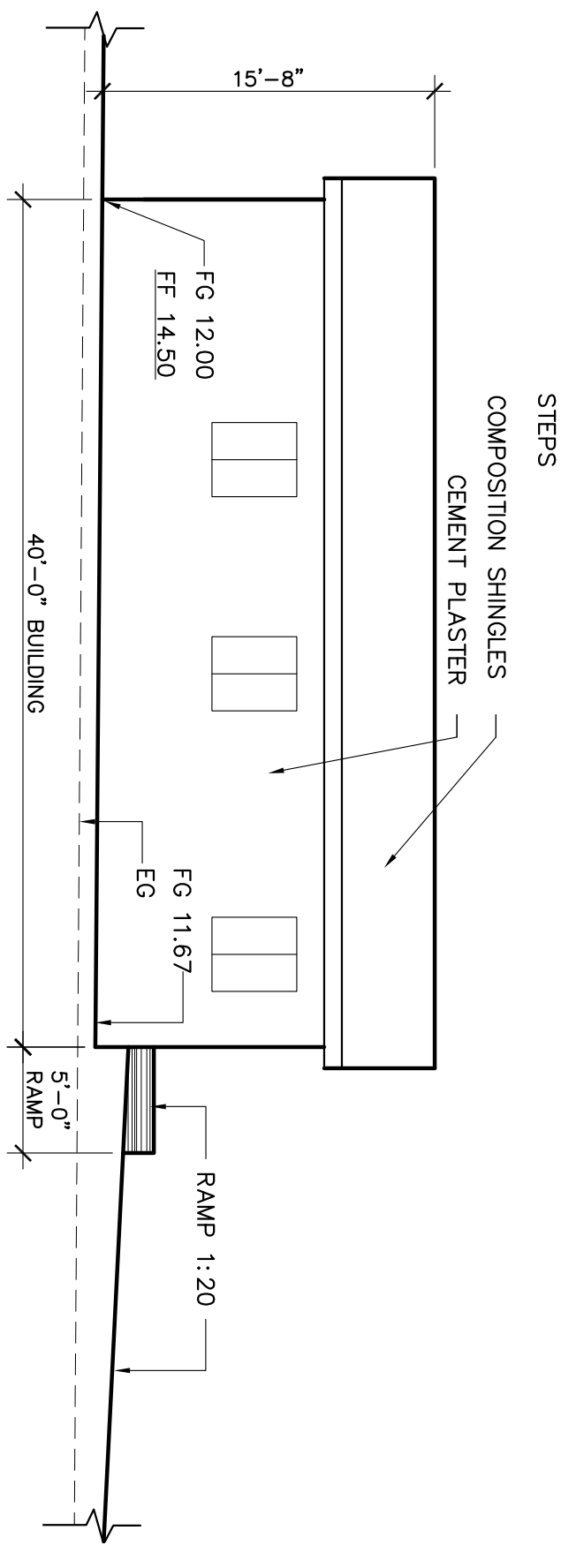
2 OFFICE - NORTH ELEV
SCALE: 1/8"=1'-0"



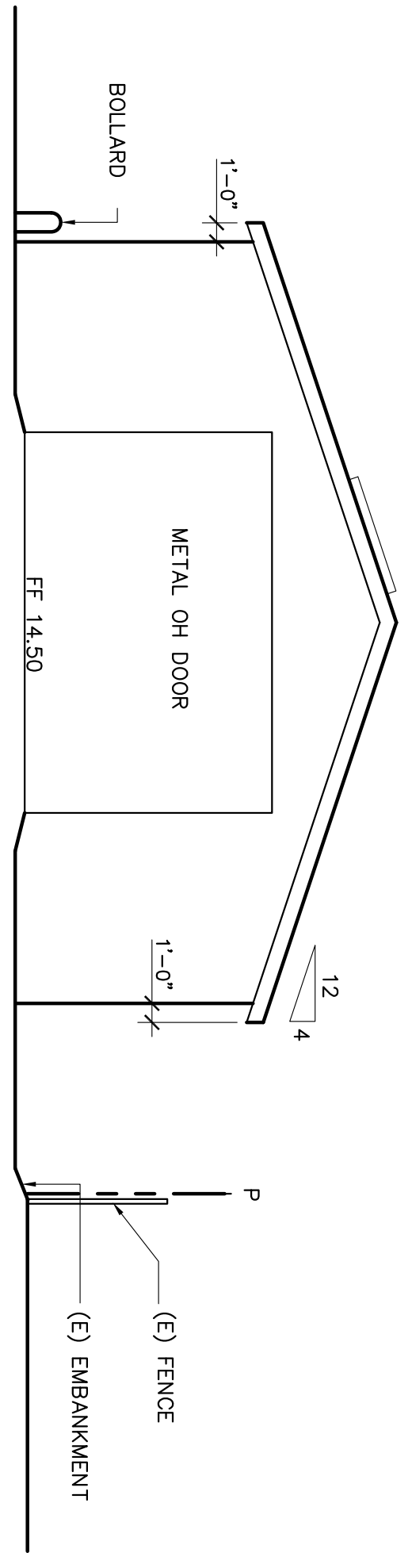
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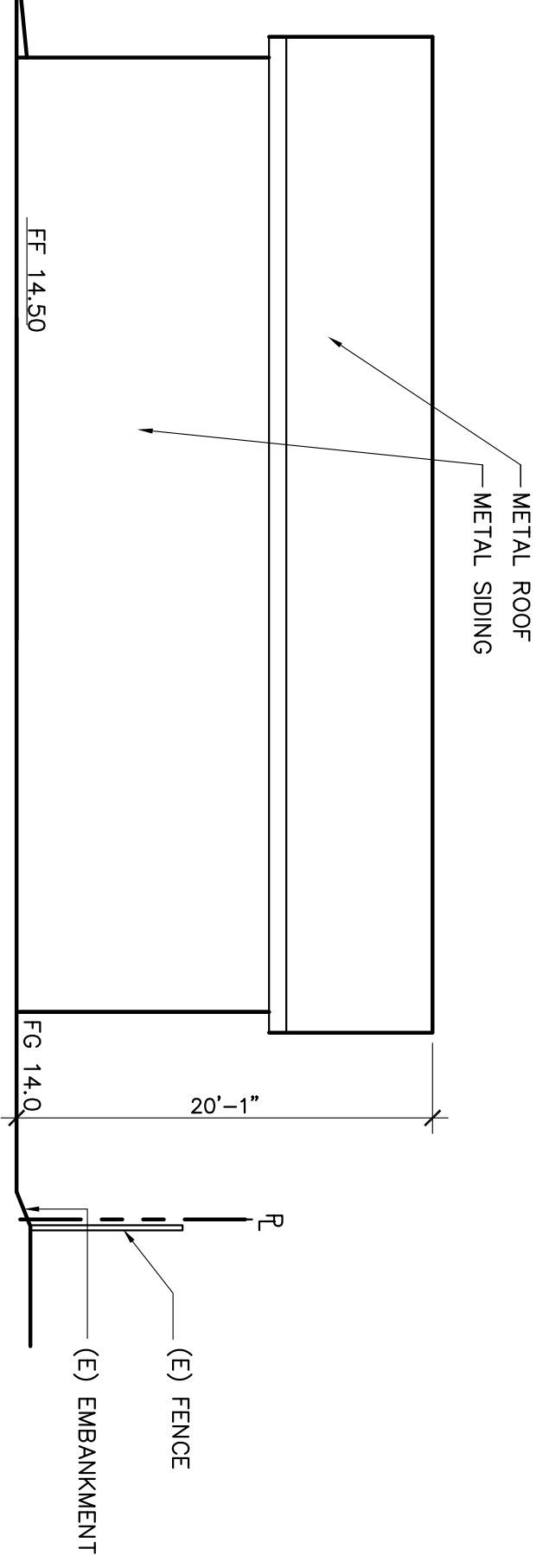
5 OFFICE - WEST ELEVATION
SCALE: 1/8"=1'-0"



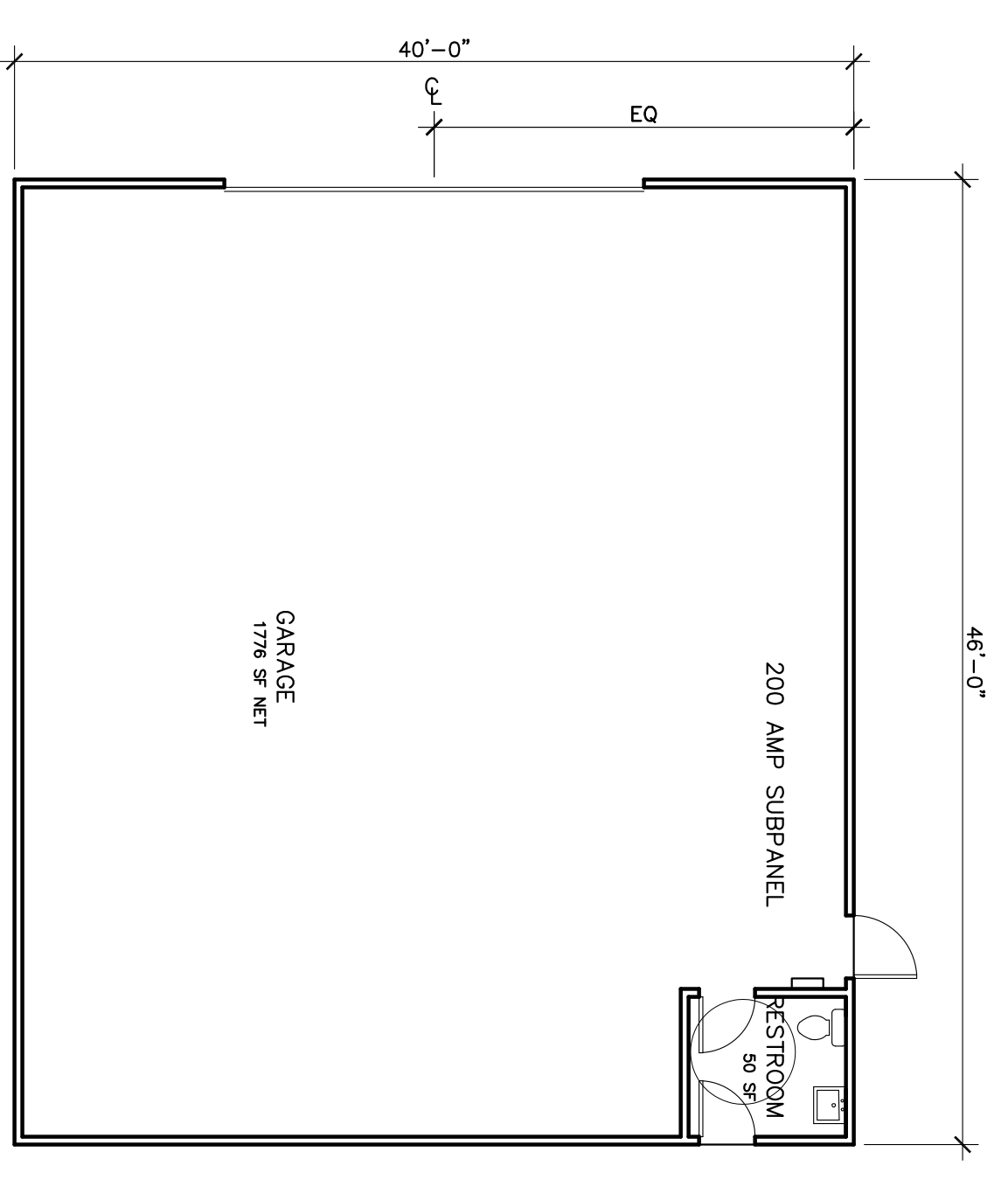
4 OFFICE - SOUTH ELEV
SCALE: 1/8"=1'-0"



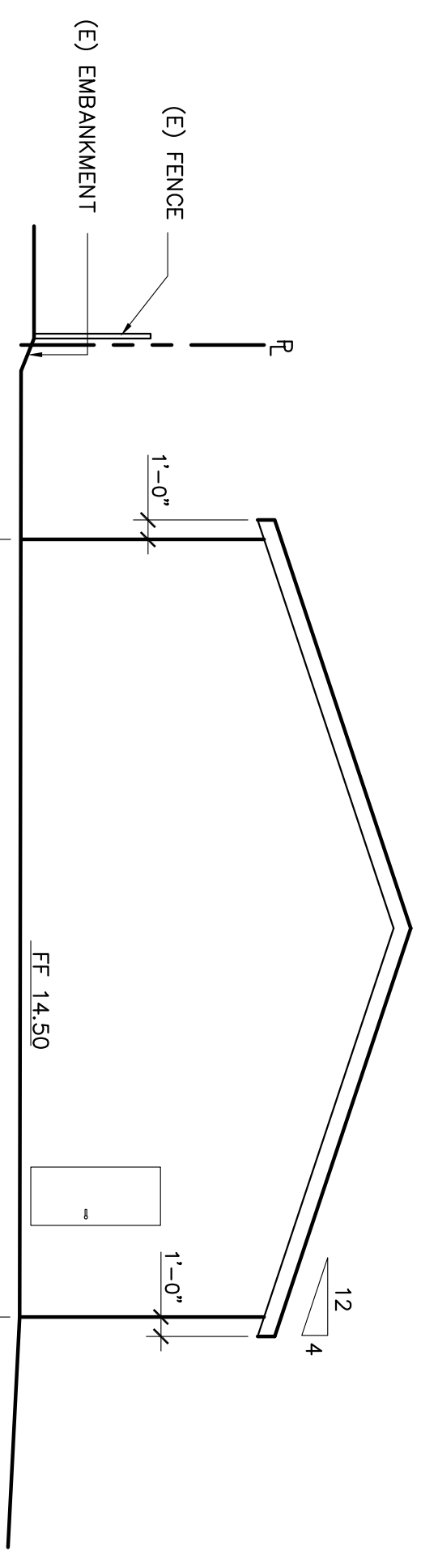
8 GARAGE - WEST ELEVATION
SCALE: 1/8"=1'-0"



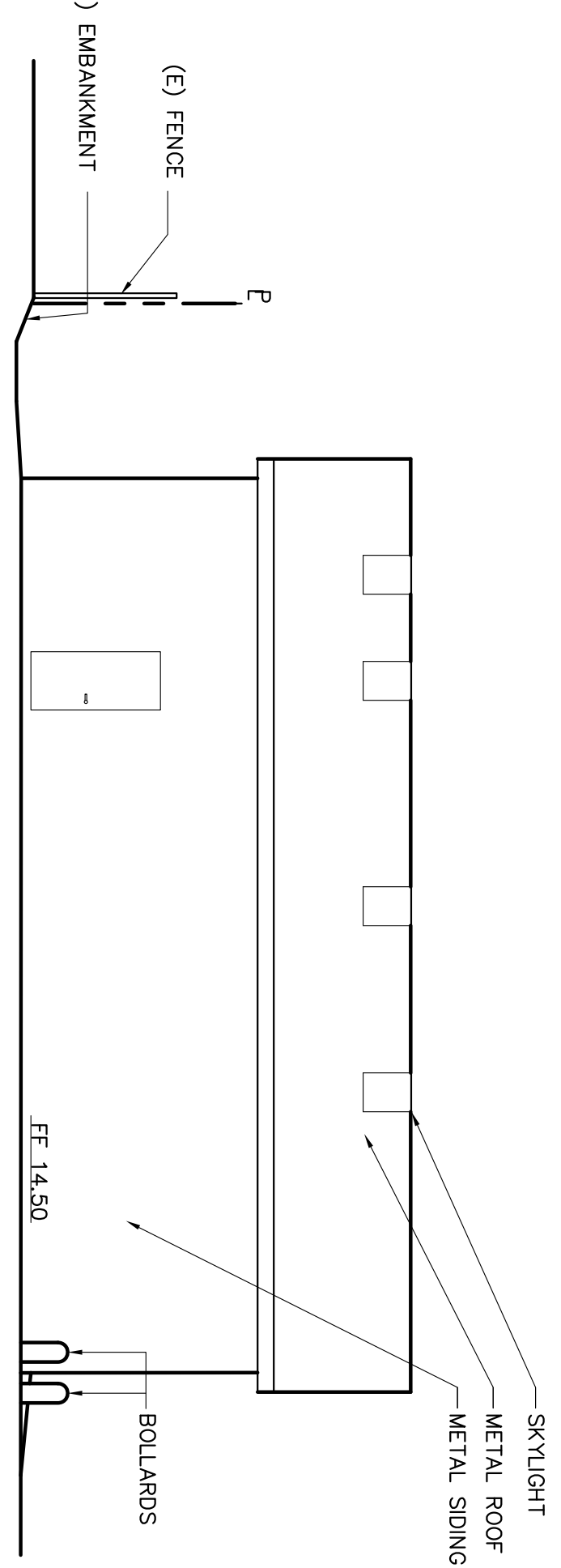
7 GARAGE - SOUTH ELEV
SCALE: 1/8"=1'-0"



6 GARAGE PLAN SCALE: 1/8"=1'-0"



10 GARAGE - EAST ELEVATION
SCALE: 1/8"=1'-0"



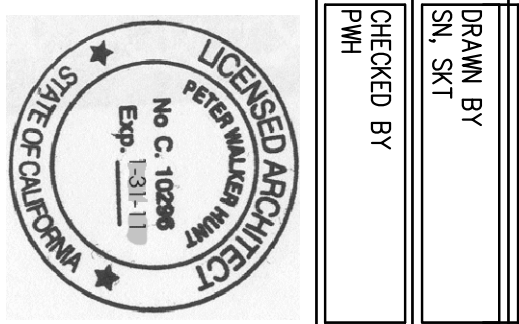
9 GARAGE - NORTH ELEV
SCALE: 1/8"=1'-0"

CONCRETE RECYCLING CENTER

903, 905, 907, & 909 SOUTH KELLOGG AVE.
GOLETA, CALIFORNIA 93117

PETER WALKER HUNT, AIA

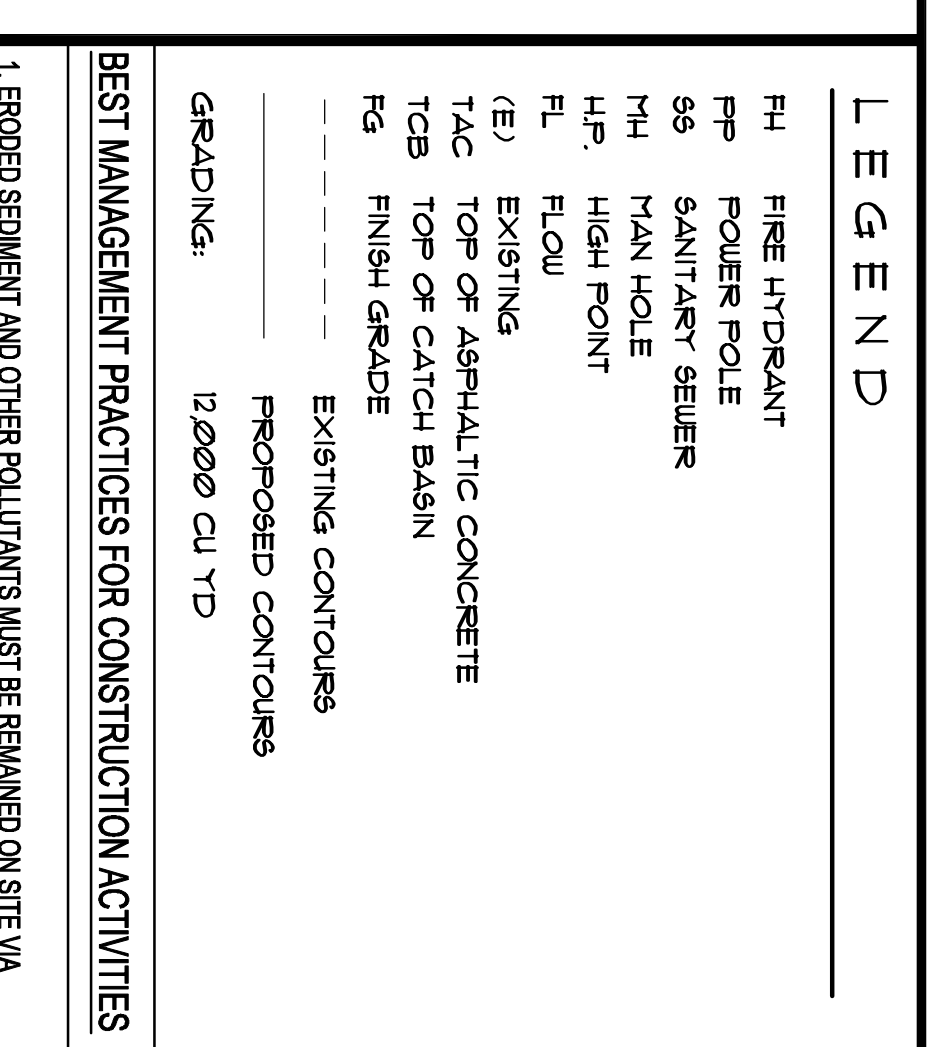
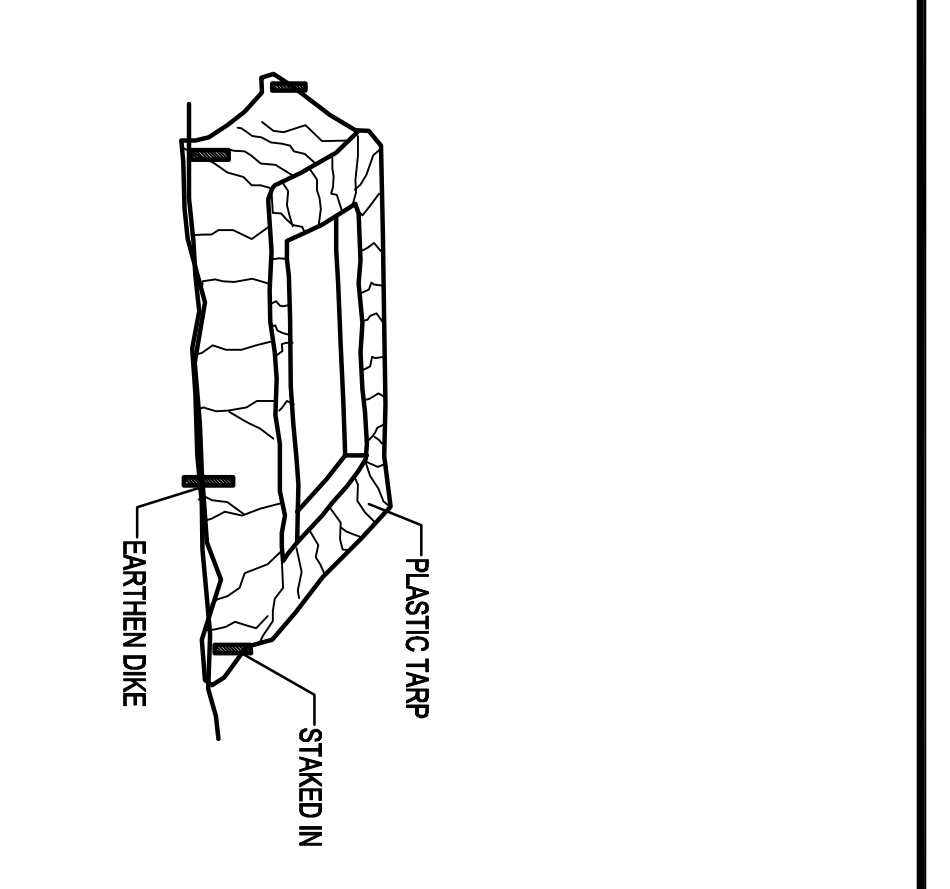
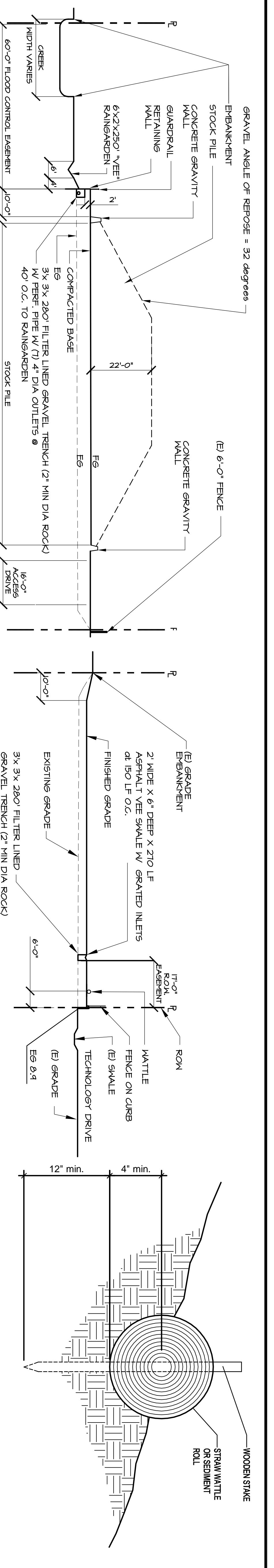
ARCHITECT
1303 B STATE STREET - P.O. BOX 92045 - SANTA BARBARA, CALIFORNIA 93190
TELEPHONE: 805.965.5600 WEB: www.peterwalkershunt.com



PROJECT NO.	09-102
REV. DATE	AUGUST 4, 2010
DESIGNED BY	PKH
CHECKED BY	PKH
DRAWN BY	SKL
SCALE	AS SHOWN

SHEET TITLE
BUILDING PLANS/ELEV

SHEET NO.
B

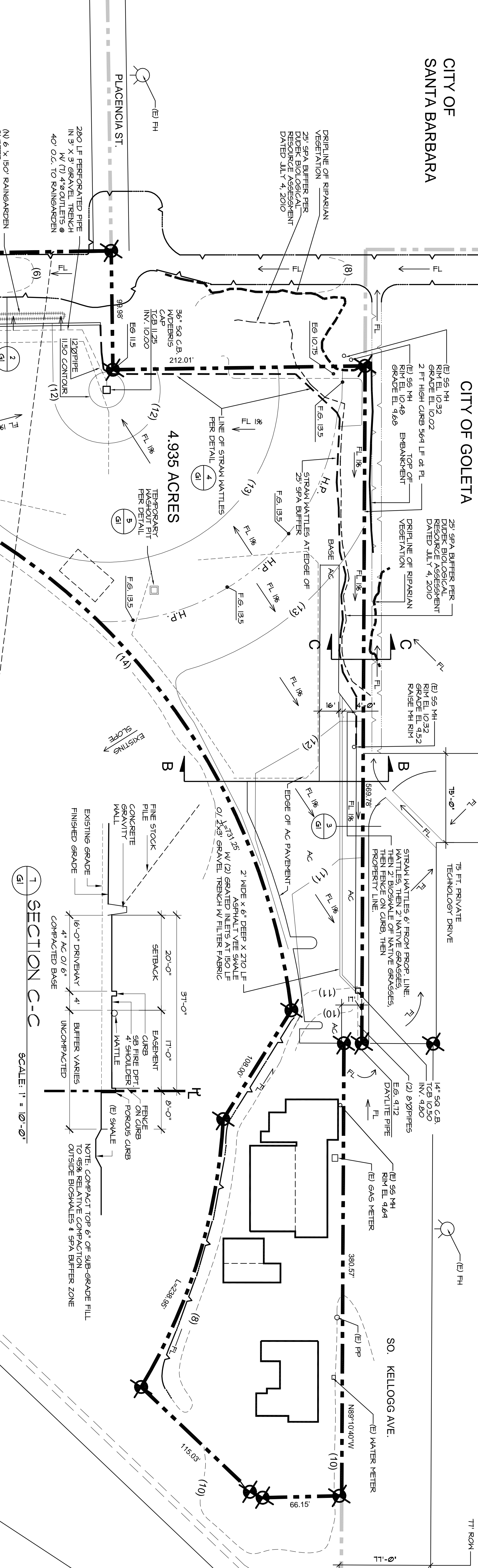


2 SITE SECTION A-A
SCALE: 1" = 20'-0"

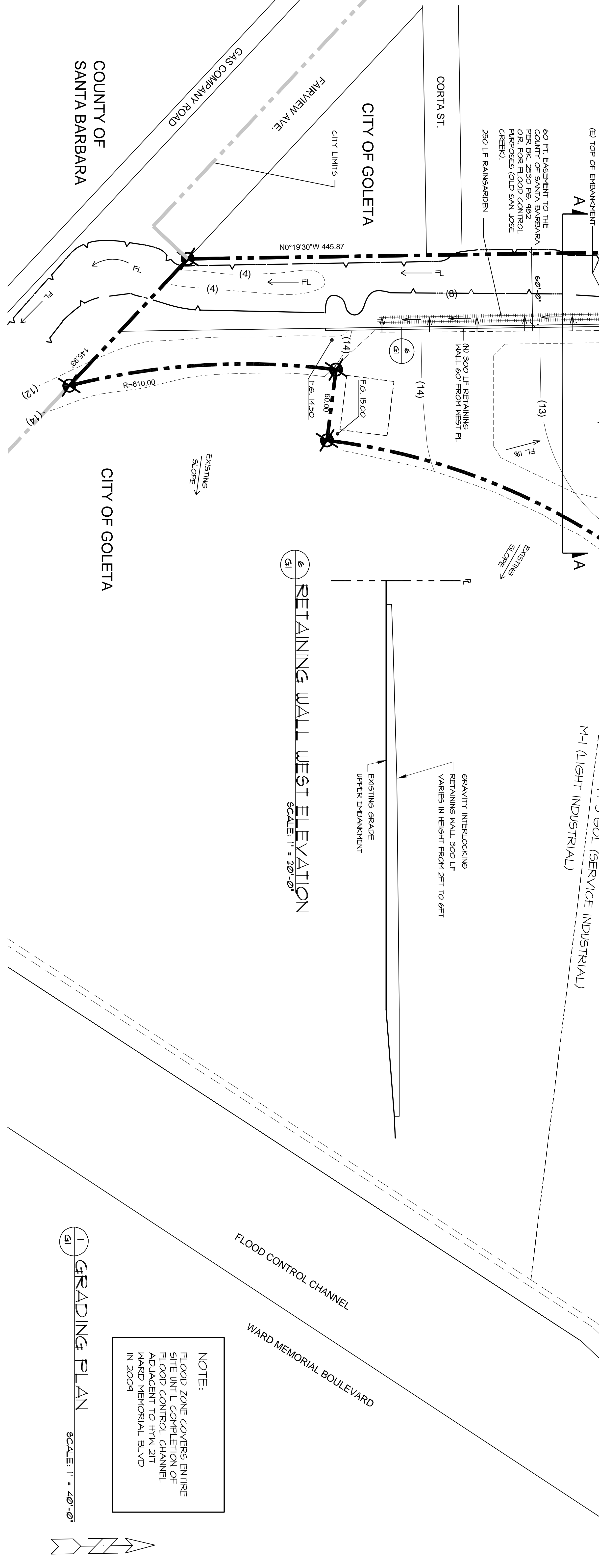
3 SITE SECTION B-B
SCALE: 1" = 20'-0"

4 ENTRENCHMENT DETAIL (IN SLOPE AREA)
SCALE: 1" = 10'-0"

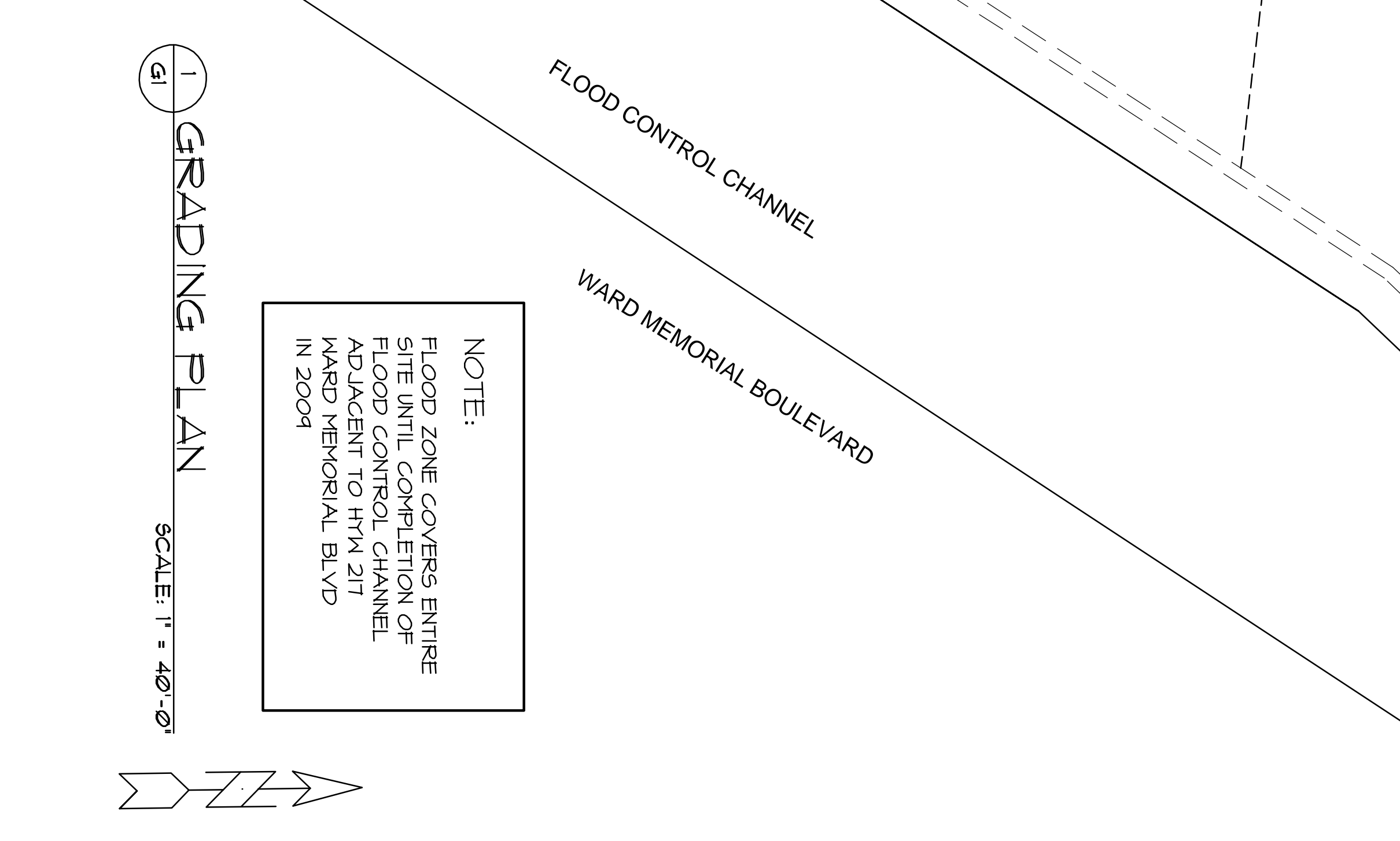
5 WASHOUT PIT DETAIL
SCALE: 1" = 10'-0"



1 SECTION C-C
SCALE: 1" = 10'-0"



6 RETAINING WALL WEST ELEVATION
SCALE: 1" = 20'-0"



7 GRADING PLAN
SCALE: 1" = 40'-0"

NOTE:
FLOOD ZONE COVERS ENTIRE SITE UNTIL COMPLETION OF FLOOD CONTROL CHANNEL ADJACENT TO HWY 217 WARD MEMORIAL BLVD IN 2004

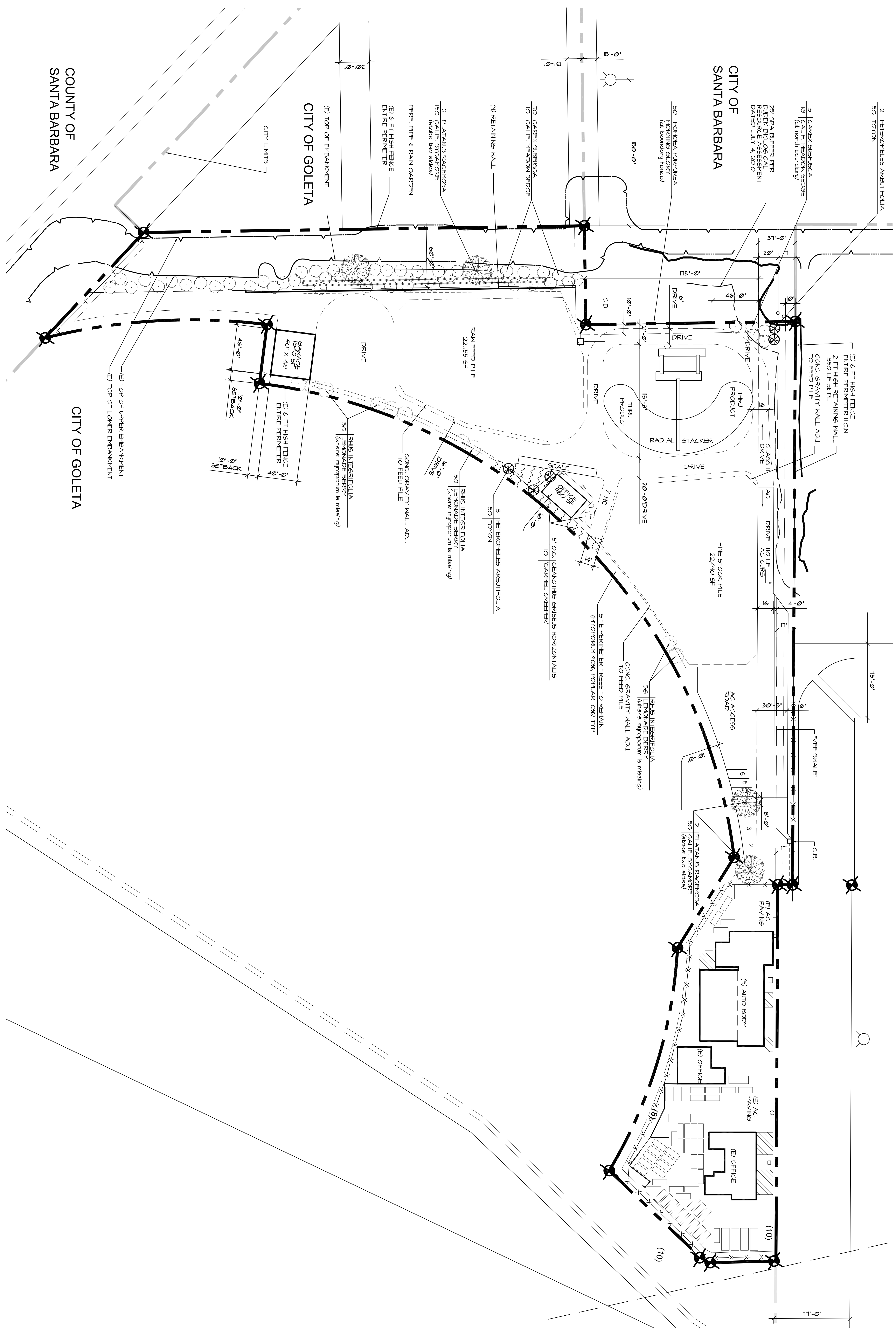
LEGEND	
PH	FIRE HYDRANT
PP	POLE
SP	SPRINKLER
SH	SHED
HH	HIGH POINT
HL	LOW POINT
FL	FLOOD LINE
TA	TOP OF ASPHALTIC CONCRETE
TC	TOP OF CATCH BASIN
FG	FINISH GRADE
---	EXISTING CONTOURS
---	PROPOSED CONTOURS
GRADING: 1:2000 CU YD	

- BEST MANAGEMENT PRACTICES FOR CONSTRUCTION ACTIVITIES**
1. ERODED SEDIMENT AND OTHER POLLUTANTS MUST BE REMOVED ON SITE VIA SHEET PILE WALLS, AERIAL DRAINAGE, NATURAL DRAINAGE COURSES OR WIND PROTECTED FROM BEING TRANSPORTED FROM THE SITE BY FORCES OF WIND OR WATER.
 2. STORMS OF FORCE AND OTHER CONSTRUCTION RELATED MATERIALS MUST BE PROTECTED FROM BEING TRANSPORTED FROM THE SITE BY FORCES OF WIND OR WATER.
 3. RILLS, OILS, SOLVENTS AND OTHER TOXIC MATERIALS MUST BE STORED IN ACCORDANCE WITH THEIR LISTING AND ARE NOT TO CONTAMINATE THE SOILS AND SURFACE WATERS. ALL APPROVED STORAGE CONTAINERS ARE TO BE PROTECTED FROM THE WEATHER. SPILLS MAY NOT BE WASHED INTO DRAINAGE SYSTEMS.
 4. EXCESS OF WASTE CONCRETE MAY NOT BE WASHED INTO PUBLIC WAY OR ON ANY OTHER DRAINAGE SYSTEM PROVISIONS MUST BE MADE TO RETAIN CONCRETE WASTES ON SITE UNTIL THEY CAN BE EMPLOYED OR AS SOLID WASTE.
 5. TRASH AND CONSTRUCTION RELATED SOLID WASTES MUST BE DEPOSITED INTO A DEDICATED STORAGE AREA TO PREVENT CONTAMINATION OF SURROUNDING AREAS BY WIND.
 6. SEDIMENTS AND OTHER MATERIAL MAY NOT BE TRACKED FROM THE SITE BY VEHICLES. THE CONSTRUCTION SITE MUST BE MAINTAINED TO PREVENT PUBLIC WAY. ACCIDENTAL DEPOSITIONS MUST BE SWEEPED UP IMMEDIATELY AND MAY NOT BE WASHED DOWN BY RAIN OR OTHER MEANS.
 7. ANY SLOPES WITH DISTURBED SOILS OR REMAINS OF VEGETATION MUST BE STABILIZED SO AS TO MINIMIZE EROSION BY WIND AND WATER.
 8. OTHER:

- EROSION CONTROL NOTES**
1. THE CONTRACTOR SHALL UTILIZE THIS PLAN SHEET FOR EROSION CONTROL PURPOSES ONLY.
 2. ALL EROSION CONTROL DEVICES SHALL BE INSTALLED IN ACCORDANCE WITH THE GUIDELINES SET FORTH IN THE CALIFORNIA STORM WATER BEST MANAGEMENT PRACTICES HANDBOOK, DATED MARCH 1983.
 3. ALL PROPOSED FEATURES SHALL BE CONSTRUCTED IN ACCORDANCE WITH THE ARCHITECTURAL AND STRUCTURAL PLANS.
 4. IN ADDITION TO THESE NOTES, THE CONTRACTOR WILL BE RESPONSIBLE FOR ALL EROSION CONTROL REQUIREMENTS SPECIFIED IN THE PROJECT CONDITIONS OF APPROVAL.
 5. THE CONTRACTOR SHALL ENSURE ALL PROTECTION MEASURES ARE IN PLACE PRIOR TO THE START OF THE RAINY SEASON. THE CREW IS ENCOURAGED TO MONITOR THE EFFECTIVENESS OF THE STRAW AND ALERT THE CONTRACTOR OF ANY PROBLEMS OR FAILURES.
 6. THE CONTRACTOR SHALL MAINTAIN THE LIMITS OF THE PROTECTION MEASURES AS HIS WORK PROGRESSES.
 7. THE CONTRACTOR SHALL ADJUST THE LIMITS OF THE PROTECTION MEASURES SHOULD THEY BE INADEQUATE TO CONTROL RUNOFF OF SILT LADEN WATER.
 8. THE CONTRACTOR SHALL REMOVE SILT FROM ALL STORM DRAIN APPURTENANCES AND EROSION CONTROL DEVICES AFTER EACH RAIN.
 9. THE PROTECTION MEASURES MAY BE TEMPORARILY MOVED OUT OF THE REINSTALLED PRIOR TO THE NEXT RAIN SIGNAL.
 10. THE CONTRACTOR SHALL ADVISE HIS CREW OF THE INTENT OF THE PROTECTION MEASURES PRIOR TO THE START OF THE RAINY SEASON. THE CREW IS ENCOURAGED TO MONITOR THE EFFECTIVENESS OF THE STRAW AND ALERT THE CONTRACTOR OF ANY PROBLEMS OR FAILURES.
 11. STORAGE OF EQUIPMENT AND STORAGE OF MATERIALS SHALL BE IN ONE GENERAL AREA. THIS AREA MAY CHANGE THROUGHOUT CONSTRUCTION AS REQUIRED. THE AREA SHALL BE INSPECTED FREQUENTLY TO ENSURE NO SPILLED HAZARDOUS MATERIALS CONTAMINATE THE EXISTING GROUND. SHOULD THIS OCCUR, THE SILL SHALL BE CLEANED UP IMMEDIATELY. THIS SILL SHALL NOT BE LOADED WITH STORM DRAINWATERS. EXISTING RESIDENCES DRAINAGE SWALES OR ADJACENT TO FILL SLOPE.

EROSION CONTROL LEGEND	
---	INDICATES APPROXIMATE LOCATION OF SILT FENCES
---	INDICATES APPROXIMATE LOCATION OF STRAW WATTLES

<p>CITY OF GOLETA CASE NO. 09-133-DP</p>	<p>CONCRETE RECYCLING CENTER 903, 905, 907, & 909 SOUTH KELLOGG AVE. GOLETA, CALIFORNIA 93117</p>	<p>PETER WALKER HUNT, AIA ARCHITECT 1303 B STATE STREET - P.O. BOX 92045 - SANTA BARBARA, CALIFORNIA 93190 TELEPHONE: 805.965.5600 WEB: www.peterwalkerhunt.com</p>
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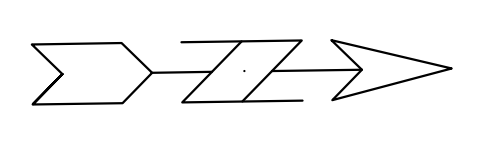


CITY OF
SANTA BARBARA

CITY OF
GOLETA

LANDSCAPE PLAN

SCALE: 1" = 40'-0"



CONCRETE RECYCLING CENTER

903, 905, 907, & 909 SOUTH KELLOG AV.
GOLETA, CALIFORNIA 93117

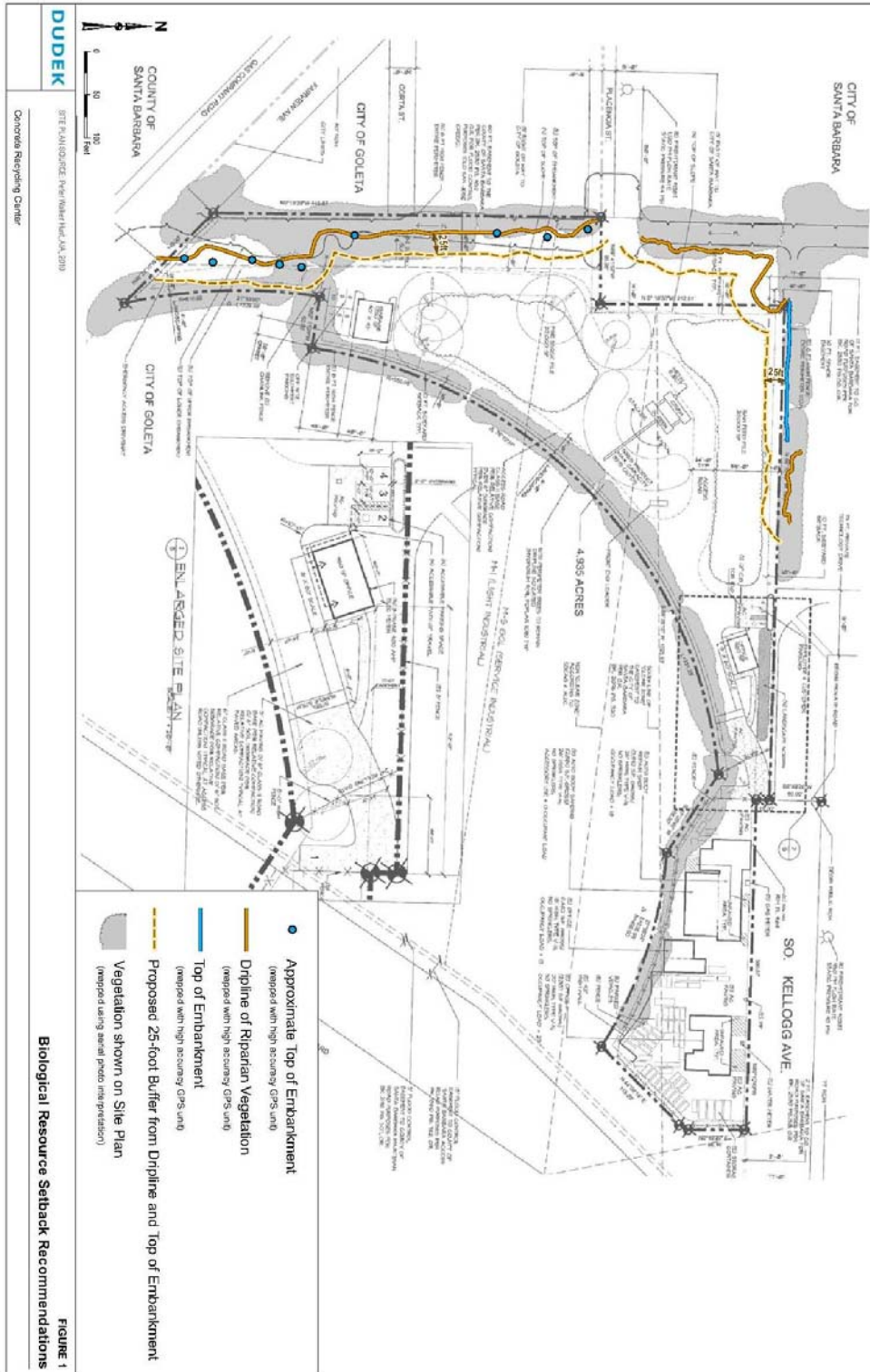
HUGH TWIBELL, LANDSCAPE ARCHITECTURE

1159 TUNNEL ROAD
SANTA BARBARA, CALIFORNIA 93105
PHONE: 805 687-9671

PROJECT NO. 04-02	REV. DATE SEPTEMBER 12, 2011	DESIGNED BY H.T.	CHECKED BY H.T.	SCALE 1" = 40'-0"
SHEET TITLE LANDSCAPE PLAN				
SHEET NO. 1				

ATTACHMENT 2

Figure 1, Biological Resource Setback Recommendations



ATTACHMENT 3

URBEMIS 2007 Version 9.2.4 Summer Emissions Summary

Page: 1

8/3/2011 4:33:02 PM

Urbemis 2007 Version 9.2.4

Summary Report for Summer Emissions (Pounds/Day)

File Name: T:\Planning-Shared\CURRENT PLANNING CASES\2009\09-133-DP 903 S Kellogg\Urbemis Run - Heavy Industrial 07-22-10.urb924

Project Name: 903 S Kellogg Concrete Recycling Facility

Project Location: Santa Barbara County APCD

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

CONSTRUCTION EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10 Dust</u>	<u>PM10 Exhaust</u>	<u>PM10</u>	<u>PM2.5 Dust</u>	<u>PM2.5 Exhaust</u>	<u>PM2.5</u>	<u>CO2</u>
2007 TOTALS (lbs/day unmitigated)	6.24	44.48	26.02	0.00	12.01	2.72	14.73	2.51	2.50	5.01	3,512.24
2008 TOTALS (lbs/day unmitigated)	61.63	57.31	40.58	0.01	12.06	3.41	15.47	2.53	3.14	5.66	5,429.39

AREA SOURCE EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (lbs/day, unmitigated)	0.52	0.83	2.23	0.00	0.01	0.01	969.25

OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (lbs/day, unmitigated)	1.87	7.63	19.63	0.01	1.01	0.30	1,047.79

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

	<u>ROG</u>	<u>NOx</u>	<u>CO</u>	<u>SO2</u>	<u>PM10</u>	<u>PM2.5</u>	<u>CO2</u>
TOTALS (lbs/day, unmitigated)	2.39	8.46	21.86	0.01	1.02	0.31	2,017.04

ATTACHMENT 4

Air Pollution Emissions From APCD ATC Permit Application 13322

APCD Comments on the Draft MND for South Kellogg Recycling Facility, 09-133-DP, 11-MND-002
 July 29, 2011
 Page 4

Attachment C - Air pollutant emissions from APCD ATC permit application 13322

Emission Source	PM		PM ₁₀	
	lb/day	ton/yr	lb/day	ton/yr
Storage Piles	10.40	1.90	3.64	0.66
Truck Unloading to Storage Pile	0.22	0.02	0.03	0.01
Loader Delivery to Impact Crusher	0.22	0.02	0.07	0.00
Portable Impact Crusher	1.92	0.19	0.86	0.09
Screen Feed Belt	0.22	0.02	0.07	0.01
Electric Screen	10.56	1.06	3.55	0.36
Screen to Stacker Transfer	0.67	0.07	0.22	0.02
Electric Stacker	0.67	0.07	0.22	0.02
Loader Delivery to Truck	0.67	0.07	0.22	0.02
Total Permitted Emissions	24.90	3.35	8.67	1.17

Notes:

- (1) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.
- (2) All emission sources are controlled with water spray.

ATTACHMENT 5



• 260 North San Antonio Road, Suite B • Santa Barbara, CA • 93110
• Phone: 805/961-8900 • Fax: 805/961-8901 • www.sbcag.org

August 22, 2011

Steve Chase
Director of Planning and Environmental Services
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117



Re: South Kellogg Recycling Facility Project Consistency Determination

Dear Steve:

The City of Goleta referred the South Kellogg Recycling Facility project to SBCAG for consistency determination with the Airport Land Use Plan (ALUP) on July 11, 2011. SBCAG has 60 days from the date of referral (until September 6, 2011) to determine the consistency of the proposed project.

On August 18, 2011, the SBCAG Board, acting as the Airport Land Use Commission for the County of Santa Barbara, reviewed the project and elected to take no action. According to relevant provisions of the City of Goleta zoning code, if the ALUC fails to make a determination within 60 days of project referral, the proposed project is automatically deemed consistent with the ALUP. Therefore, the South Kellogg Recycling Facility project will be deemed consistent with the ALUP as of September 6, 2011 by operation of law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter Imhof".

Peter Imhof
Deputy Director, Planning

cc: Phil Crimmins, Caltrans Division of Aeronautics
Karen Ramsdell, Santa Barbara Airport
Bill Yim, Senior Transportation Planner
File (CP 03-05-14)

ALUC/ALUP/EIR Com/EIR Com/Apt Related/ SKellogg Recyclg Fac/Goleta Ltr SKRF ConsistDetermin'n Ltr 082211

Member Agencies

Buellton • Carpinteria • Goleta • Guadalupe • Lompoc • Santa Barbara • Santa Maria • Solvang • Santa Barbara County

ATTACHMENT 6
DMND Comment Letters



Santa Barbara County
Air Pollution Control District

Our Vision  Clean Air

July 29, 2011

Alan Hanson
City of Goleta Planning & Environmental Services
130 Cremona Drive, Suite B
Goleta, CA 93117



**Re: APCD Comments on the Draft Mitigated Negative Declaration for South Kellogg Recycling Facility
09-133-DP, 11-MND-002**

Dear Mr. Hanson:

The Air Pollution Control District (APCD) has reviewed the Draft Mitigated Negative Declaration (MND) for the above-referenced project. Existing uses on the parcel include three existing buildings, totaling 10,741 square feet, providing commercial space for a towing service, a general contractor, and an auto repair shop. A separate portion of the site has historically been used as an auto salvage yard for a business with offices offsite. The project consists of a new concrete recycling facility and office to replace the existing auto salvage yard and auto towing office. Proposed construction includes a 960 square foot sales office and a 1,840 square foot equipment garage. The project will use an electrically-powered portable crusher, an electric screening plant, and an electric radial stacker, augmented with various heavy vehicles for material movement. The operational area for concrete crushing totals approximately 18,400 square feet. The area dedicated to stockpiling of raw materials is approximately 20,000 square feet, and a separate area of 20,000 square feet is dedicated for stockpiling of finished product. Grading for the site consists of 12,000 cubic yards of fill to raise the site above the 100-year floodplain. Also proposed are a loop road for internal circulation of the site, and retaining walls, fencing and landscape screening along portions of the site perimeter. The subject property, a 4.9-acre parcel zoned Service/Industrial and Light Industry and identified in the Assessor Parcel Map Book as APN 071-190-034, is located at 903 South Kellogg Avenue in the City of Goleta.

The proposed project requires APCD permits for stockpiled materials. Therefore, APCD is a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the MND when issuing APCD permits for the proposed stockpiles. The MND should include the air pollutant emissions for all proposed equipment to avoid additional CEQA documentation requirements related to APCD permit issuance.

Air Pollution Control District staff offers the following comments on the Draft MND:

1. **Thresholds of Significance, Pg. 20:** The third paragraph states that construction emissions are included in the Clean Air Plan and therefore construction emissions thresholds are not needed. This statement does not reflect APCD's current guidance regarding construction air quality impact assessment and mitigation. APCD's current guidance is documented in Chapter 5 of the *Scope and Content of Air Quality Sections in Environmental Documents* (updated June, 2010) that is available online at www.sbcapcd.org/apcd/landuse.htm. The MND should include an estimate of construction-related air pollutant emissions, and should include mitigation

Terence E. Dressler • Air Pollution Control Officer
260 North San Antonio Road, Suite A • Santa Barbara, CA 93110 • www.sbcapcd.org • 805.961.8800 • 805.961.8801 (fax)

measures to ensure that localized air quality impacts do not occur during the construction phase of the project. Attachments A and B of this letter include APCD-recommended mitigation measures for dust and engine exhaust emissions.

2. **Thresholds of Significance, Pg. 20:** All MND references to the 2008 Clean Air Plan should be changed to the adopted 2010 Clean Air Plan.
3. **Project Specific Impacts, Pg. 20, 21:** All MND references to the 2004 and 2008 Clean Air Plan should be changed to the adopted 2010 Clean Air Plan.
4. **Project Specific Impacts, Pg. 20:** The project description refers to an 18,400 square foot operational area for concrete crushing activities and equipment. The project description on Page 2 of the MND refers to a 16,000 square foot operational area. Please revise the MND to correct this inconsistency. The area square footage for the stockpile and operational areas should also be consistent with the depictions in the attached project plans.
5. **Project Specific Impacts, Short-term Construction, Items A & B, Impacts, Pg. 20:** Please revise the text in this section to reflect any changes that were made in response to comment number 1 of this letter.
6. **Project Specific Impacts, Long-Term Operational Impacts, Pg. 21:** The project's total operational emissions (stationary source emissions plus mobile source emissions) should be compared to the City of Goleta's adopted air quality significance thresholds. If the City of Goleta does not have air quality significance thresholds for PM₁₀, then we recommend the use of the APCD adopted PM₁₀ significance threshold of 80 lb/day. For more information, please reference page 6 of the Scope & Content document. Please discuss the calculation method and assumptions used to determine operational emissions. The discussion should include the estimated daily PM₁₀ emissions from the recycling operation as calculated for the APCD Authority to Construct (ATC) permit application #13322 (PM₁₀ emission are estimated at 8.67 lb/day). The emissions table for ATC permit application 13322 is included as **Attachment C**. Please also include summary reports from the URBEMIS program (or other emissions calculator used) as an attachment to the MND.
7. **Required Mitigation Measures, Pg. 24:** Please update the diesel construction vehicle mitigations with the latest APCD recommended diesel mitigations included as Attachment B.

Air Pollution Control District staff offers the following suggested permit conditions:

1. Standard dust mitigations (**Attachment A**) are recommended for all construction and/or grading activities. The name and telephone number of an on-site contact person must be provided to the APCD prior to issuance of land use clearance.
2. APCD Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities*, became effective on July 21, 2010 and establishes new limits on the generation of visible fugitive dust emissions at demolition and construction sites. The rule includes measures for minimizing fugitive dust from on-site activities and from trucks moving on- and off-site. The text of the rule can be viewed on the APCD website at www.sbcapcd.org/rules/download/rule345.pdf.

3. Fine particulate emissions from diesel equipment exhaust are classified as carcinogenic by the State of California. Therefore, during project grading, construction, and hauling, construction contracts must specify that contractors shall adhere to the requirements listed in **Attachment B** to reduce emissions of ozone precursors and fine particulate emissions from diesel exhaust.
4. Prior to occupancy, APCD permits must be obtained for all equipment that requires an APCD permit. APCD Authority to Construct permits are required for diesel engines rated at 50 bhp and greater (e.g., firewater pumps and emergency standby generators) and boilers/large water heaters whose combined heat input rating exceeds 2.0 million BTUs per hour.
5. All portable diesel-fired construction engines rated at 50 brake-horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Construction engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.
6. If contaminated soils are found at the project site, the APCD must be contacted to determine if Authority to Construct and/or Permit to Operate permits will be required.
7. At all times, idling of heavy-duty diesel trucks must be limited to five minutes; auxiliary power units should be used whenever possible. State law requires that drivers of diesel-fueled commercial vehicles:
 - shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location
 - shall not idle a diesel-fueled auxiliary power system (APS) for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle.
8. Asphalt paving activities shall comply with APCD Rule 329, *Cutback and Emulsified Asphalt Paving Materials*.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8893 or via email at edg@sbcapcd.org.

Sincerely,



Eric Gage,
Air Quality Specialist
Technology and Environmental Assessment Division

Attachments: A. Fugitive Dust Control Measures
B. Diesel Particulate and NO_x Emission Measures
C. Air pollutant emissions from APCD ATC permit application 13322

cc: Peter Hunt
Project File
TEA Chron File



ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES

These measures are required for all projects involving earthmoving activities regardless of the project size or duration. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions.

- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.
- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

Plan Requirements: All requirements shall be shown on grading and building plans and as a note on a separate information sheet to be recorded with map. **Timing:** Requirements shall be shown on plans or maps prior to land use clearance or map recordation. Condition shall be adhered to throughout all grading and construction periods.

MONITORING: Lead Agency shall ensure measures are on project plans and maps to be recorded. Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.



ATTACHMENT B
DIESEL PARTICULATE AND NO_x EMISSION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is an updated list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- All portable diesel-powered construction equipment shall be registered with the state's portable equipment registration program OR shall obtain an APCD permit.
- Fleet owners of mobile construction equipment are subject to the California Air Resource Board (CARB) Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.
- All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes; electric auxiliary power units should be used whenever possible.

The following measures are recommended:

- Diesel construction equipment meeting the California Air Resources Board (CARB) Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

Plan Requirements: Measures shall be shown on grading and building plans. **Timing:** Measures shall be adhered to throughout grading, hauling and construction activities.

MONITORING: Lead Agency staff shall perform periodic site inspections to ensure compliance with approved plans. APCD inspectors shall respond to nuisance complaints.

Attachment C - Air pollutant emissions from APCD ATC permit application 13322

Emission Source	PM		PM ₁₀	
	lb/day	ton/yr	lb/day	ton/yr
Storage Piles	10.40	1.90	3.64	0.66
Truck Unloading to Storage Pile	0.22	0.02	0.03	0.01
Loader Delivery to Impact Crusher	0.22	0.02	0.07	0.00
Portable Impact Crusher	1.92	0.19	0.86	0.09
Screen Feed Belt	0.22	0.02	0.07	0.01
Electric Screen	10.56	1.06	3.55	0.36
Screen to Stacker Transfer	0.67	0.07	0.22	0.02
Electric Stacker	0.67	0.07	0.22	0.02
Loader Delivery to Truck	0.67	0.07	0.22	0.02
Total Permitted Emissions	24.90	3.35	8.67	1.17

Notes:

- (1) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.
- (2) All emission sources are controlled with water spray.

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS – M.S.#40
1120 N STREET
P. O. BOX 942874
SACRAMENTO, CA 94274-0001
PHONE (916) 654-4959
FAX (916) 653-9531
TTY 711



*Flex your power!
Be energy efficient!*

August 1, 2011

Mr. Alan Hanson
City of Goleta
Planning and Environmental Services
130 Cremona Drive, Suite B
Goleta, CA 93117

Dear Mr. Hanson:

Re: Mitigated Negative Declaration for the South Kellogg Recycling Facility

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety, noise, and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. The following comments are offered for your consideration.

The proposal is for development of a concrete and asphalt/aggregate concrete recycling facility at 903 South Kellogg Avenue in the City of Goleta. The project site is located approximately 1,775 feet east of the Santa Barbara Municipal Airport which has approximately 200 based aircraft and 150,000 annual operations. The recycling facility would include garage and sales-office buildings, raw and finished material stockpiles and crushing equipment.

In accordance with CEQA, Public Resources Code Section 21096, the California Airport Land Use Planning Handbook (Handbook) must be utilized as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries or if such a plan has not been adopted, within two miles of an airport. The Handbook is a resource that should be applied to all public use airports and is available on-line at <http://www.dot.ca.gov/hq/planning/aeronaut/documents/ALUPHComplete-7-02rev.pdf>.

According to the Santa Barbara Airport, Airport Layout Plan, portions of the project site appear to be within the Runway Protection Zone (RPZ) for the approach end of Runway 25. The RPZ is the most critical of the airport safety zones, considered to be at "very high risk" due its proximity to the end of the runway. The Handbook generally recommends prohibiting all new structures within the RPZ. This must be thoroughly addressed through the environmental process.

The Federal Aviation Administration's (FAA) Airport Design Guide, AC150/5300-13, contains guidance pertaining to land uses within the RPZ. Also, as part of FAA grant assurances, if an airport sponsor receives federal funds for an airport, it is required that use of land adjacent to or in the immediate vicinity of the airport be restricted to activities and purposes compatible with normal airport operations.

California Public Utilities Code Section 21659 prohibits structural hazards near airports. The proposal will require submission of a Notice of Proposed Construction or Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) in accordance with Federal Aviation Regulation, Part 77 "Objects Affecting Navigable

Mr. Alan Hanson
August 1, 2011
Page 2

Airspace.” Form 7460-1 is available on-line at <https://oeaaa.faa.gov/oeaaa/external/portal.jsp> and should be submitted electronically to the FAA.

Due to its proximity to the airport, the project site will be subject to aircraft overflights and subsequent aircraft-related noise impacts. As discussed in the Mitigated Negative Declaration, some of the project components are within a Clear Zone for Santa Barbara Airport as defined by the Santa Barbara County Airport Land Use Plan. The proposal should be submitted to the Santa Barbara County Airport Land Use Commission (ALUC) for a consistency determination. The proposal should also be coordinated with the Santa Barbara Municipal Airport Manager to ensure that the proposal will be compatible with future as well as existing airport operations.

If the ALUC determines that the proposed action is inconsistent with the airport land use compatibility plan, the referring agency shall be notified. The local agency may, after a public hearing, propose to overrule the ALUC by a two-thirds vote of its governing body after it makes specific findings. At least 45 days prior to the decision to overrule the ALUC, the local agency’s governing body shall provide to the ALUC and Caltrans a copy of the proposed decision and findings. Caltrans reviews and comments on the specific findings a local government intends to use when proposing to overrule an ALUC. Caltrans specifically looks at the proposed findings to gauge their relationship to the overrule. Also, pursuant to the PUC 21670 et seq., findings should show evidence that the local agency is minimizing “...the public’s exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.”

The protection of airports from incompatible land use encroachment is vital to California’s economic future. Santa Barbara Municipal Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports is both a local and State issue, airport staff, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

These comments reflect the areas of concern to the Division with respect to airport-related noise, safety, and regional land use planning issues. We advise you to contact our District 5 office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-6223, or by email at philip_crimmins@dot.ca.gov.

Sincerely,

Original Signed by

PHILIP CRIMMINS
Aviation Environmental Specialist

c: Santa Barbara County ALUC, Santa Barbara Municipal Airport



City of Santa Barbara

Santa Barbara Airport

www.flysba.com

August 3, 2011

Alan Hanson, Senior Planner
Planning and Environmental Services
130 Cremona Drive, Suite B
Goleta, CA 93117

Administration
805.967.7111

Marketing
805.692.6004

Engineering
805.692.6018

Maintenance
805.692.6060

Operations/Noise
805.692.6005

Patrol
805.681.4803

Planning
805.692.6023

Property Mgmt.
805.692.6022

Visitors' Center
805.964.7622

Fax
805.964.1380

601 Firestone Rd.
Santa Barbara, CA
93117



RE: DRAFT MITIGATED NEGATIVE DECLARATION – SOUTH KELLOGG RECYCLING FACILITY PROJECT (09-133-DP; 11-MND-002)

Dear Alan:

Thank you for the opportunity to comment on the Draft Mitigated Negative Declaration (MND) for the South Kellogg Recycling Facility Project. The Santa Barbara Airport is concerned with both the proposed project and the analysis contained in the Draft MND. Specifically we are providing comment on the Hazards and Hazardous Materials and Land Use and Planning sections.

Regulatory Framework

The current regulatory framework for airport land use compatibility is complicated. Federal, State, and local government regulations define clearances and appropriate land use in the vicinity of the Santa Barbara Airport. Until this is remedied by an updated Airport Land Use Compatibility Plan, the Final MND should evaluate the project's consistency with relevant policies in each layer.

"Existing" Approach and Clear Zone

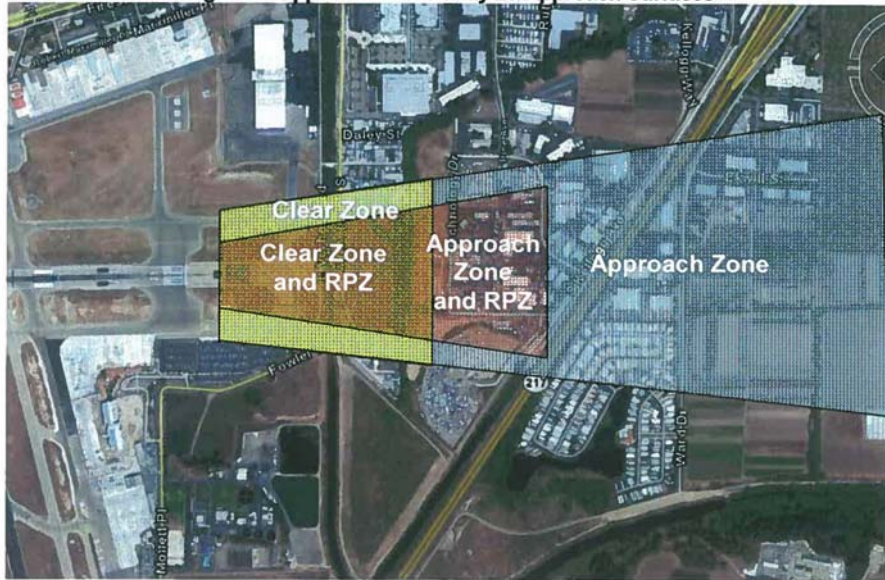
The Draft MND evaluates the proposed project relative to the 1993 Santa Barbara County Airport Land Use Plan (ALUP). The ALUP defines Safety Area 1 (Clear Zone) as property within 1,700 feet from a line 200 feet of the end of Runway 25 measured on extended centerline. Most land uses are designated as incompatible with Safety Area 1 (Clear Zone). Commercial uses are generally considered compatible with Safety Area 2 (Approach Zone) provided they do not result in large concentrations of people.

"De Facto" Approach and Clear Zone

On March 22, 2002 the Airport Land Use Commission (ALUC) deemed the Santa Barbara Airport Aviation Facilities Plan (AFP) consistent with the ALUP. In January 2008 the Airport relocated Runway 7-25 eight hundred feet to the west as proposed in the Airfield Safety Projects. On February 9, 2009 the Federal Aviation Administration (FAA) adopted the revised Airport Layout Plan (ALP) showing the relocated Runway and correspondingly relocated imaginary surfaces. While the ALUP has not been updated since 1993, the Santa Barbara County Association of Governments is currently undertaking an update of this Plan to reflect both physical and policy changes. The Final MND should include an analysis of the post-2008 Runway configuration and relocated Approach and Clear Zones relative to the policies

contained in the ALUP as this reflects current Airport activity. Figure 1 presents the current configuration.

Figure 1: Approximate Runway 25 Approach Surfaces



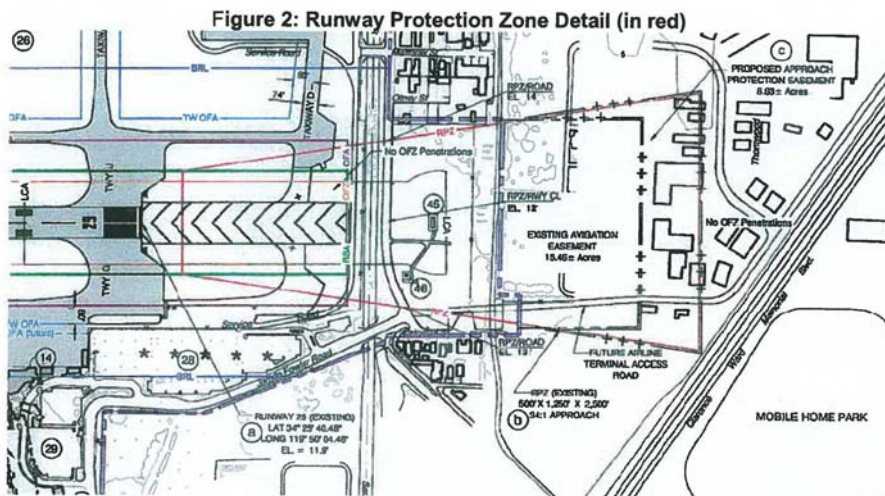
California Department of Transportation (CalTrans) Aeronautics Handbook(s)

California Assembly Bill 332 (AB 332 [2003]) provides that local agencies "shall be guided" by the CalTrans Aeronautics Handbook and Federal regulations. This is complicated by the fact that the current CalTrans Aeronautics Handbook was published in 2002, but the 2011 update currently exists in draft-final form. The 2002 Handbook provides guidance on how to calculate population density. The draft-final 2011 Handbook establishes runway zones which are likely to be incorporated into State and local regulations in the near future. The Final MND should evaluate the proposed project relative to the 2011 Handbook's Runway Protection Zone (RPZ) designation and associated recommended land-use limitations.

Federal Imaginary Surfaces

The RPZ and the Approach Zone are both defined by Federal Aviation Regulations (AC 150/5300-13 and 14 CFR Part 77) and are shown on the ALP adopted by the FAA in 2009. While the FAA prefers that RPZs be owned by airports and kept clear, some land uses are allowable. Recommended prohibited land uses in the RPZ include places of public assembly, including office buildings (AC 150/5300-13 Section 212.a.(2)). The Final MND should evaluate the proposed project relative to FAR Part 77 and associated Advisory Circulars. Figure 2 shows the location of the RPZ for Runway 25.

The Approach Zone extends from 200 feet beyond the threshold of Runway 7-25 at a width beginning at 1000 feet and extending upward at a ratio of 34:1. This is identical to the "de facto" Clear and Approach Zones mentioned above.



Air Quality

The Airport is concerned that the proposed project would generate dust that may cause a visual obstruction or present a hazard to aircraft engines. Required Mitigation Measure 2 (Page 23) should be revised to require wetting piles at all times and/or the erection of a screen above the piles to limit dust rising from the site. Such measures would protect air quality for the flying public as well as those on the ground.

Hazards and Hazardous Materials

The western boundary of the proposed project site is approximately 1,500 feet from the western boundary of the Runway 7-25 Approach Zone. Figure 1 incorrectly states that the proposed project site is 770' from the edge of Runway 7-25; this may be the result of using an aerial dated before 2008. Please revise this figure to add existing conditions.

Figure 2 appears to reference the contours of the previous imaginary surfaces. The southern boundary of the Approach and Clear Zones appears farther north than their actual position. Additionally the elevation markers in Figure 2 appear to reflect pre-2008 configuration. Please revise this figure to add existing conditions and revise the corresponding analysis.

The Airport appreciates the City of Goleta's attention to the FAA's Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) Program. The applicant will need to file Form 7460-1 as the proposed project would create new construction that would exceed a 100:1 surface from at least

one point on a runway. This filing is required by law (14 CFR Part 77.9 and AC 70/7460-1k) and should not be considered mitigation of safety impacts.

Section e should be revised to include an analysis of the safety risks posed to the public and to aviation associated with the proposed construction in the RPZ. Mitigation Measure 1 (page 55) does not mitigate this safety risk. The Airport believes this is a potentially significant impact.

Land Use and Planning

As the City of Goleta General Plan does not include an overlay of the RPZ Section b should be revised to include an analysis of the proposed project's compliance with Federal requirements outlined in AC 150/5300-13 and FAR Part 77. Without this analysis it is not possible to conclude that the proposed project would not present a potentially significant impact.

The proposed project site is located in an area designated "future aviation easement" on the Santa Barbara Airport ALP. The proposed project should be conditioned to require execution an aviation easement with the Santa Barbara Airport to protect airspace and ensure that aircraft noise is discussed whenever the property is sold.

Thank you for the opportunity to provide comment on the Draft MND. If you have any questions about this letter, feel free to contact me or Andrew Bermond, Project Planner at (805) 692-6032.

Sincerely,


Karen Ramsdell
Airport Director

cc: Planning file
Melissa Hetrick, Environmental Analyst
Margie Drilling, Airport Planner, FAA Western-Pacific Region
Philip Crimmins, Associate Transportation Planner, CalTrans Aeronautics Division
Bill Yim, Senior Transportation Planner, SBCAG



U.S. Department
of Transportation
Federal Aviation
Administration

Western-Pacific Region
Los Angeles Airports District Office

Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 90009-2007

July 17, 2011

Mr. Alan Hanson
Planning & Environmental Services
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117



Dear Mr. Hanson:

**Notice of Public Availability/Notice of Public Hearing
South Kellogg Recycling Facility Project**

I am in receipt of your copy of Notice of Public Availability/Notice of Public Hearing for the South Kellogg Recycling Facility Project in the City of Goleta. The proposed project appears to be located approximately 1300-feet east of Santa Barbara Airport.

It is necessary under Part 77 of the Federal Aviation Regulations to notify the Federal Aviation Administration (FAA) of any proposal which would exceed certain elevations with respect to the ground and neighboring airports.

CFR Title 14 Part 77.13 states that any person/organization who intends to sponsor any of the following construction or alterations must notify the Administrator of the FAA:

- any construction or alteration exceeding 200 ft above ground level

any construction or alteration:

- within 20,000 ft of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 ft
- within 10,000 ft of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 ft
- within 5,000 ft of a public use heliport which exceeds a 25:1 surface
- any highway, railroad or other traverse way whose prescribed adjusted height would exceed that above noted standards when requested by the FAA
- any construction or alteration located on a public use airport or heliport regardless of height or location.

To fulfill this requirement, it is necessary to complete and return a copy of the Form 7460-1, Notice of Proposed Construction or Alteration. This form is found on the web at: <http://forms.faa.gov/forms/7460-1.pdf>. Once completed please forward the 7460-1, and any related plans for obstruction evaluation to:

Federal Aviation Administration
Southwest Regional Office
Air Traffic Airspace Branch, ASW-520
2601 Meacham Blvd.
Fort Worth, TX 76137-4298

Or coordinate with FAA's Western-Pacific Region System Obstruction Specialist Karen McDonald to address any potential air space obstruction issues. Ms. McDonald may be contacted at 310-725-6557 or karen.mcdonald@faa.gov.

If you have any questions regarding this matter, please feel free to give me a call at (310) 725-3637.

Sincerely,



Victor Globa
Environmental Protection Specialist



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

August 9, 2011



Alan Hanson
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

Subject: South Kellogg Concrete and Asphalt Recycling Facility
SCH#: 2011071025

Dear Alan Hanson:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on August 8, 2011, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

SCH# 2011071025
Project Title South Kellogg Concrete and Asphalt Recycling Facility
Lead Agency Goleta, City of

Type MND Mitigated Negative Declaration
Description The project site is currently developed with three existing buildings on the 4,935 acre site. Two of these buildings are currently used as offices for a towing service and a general contractor, and the third is used as an auto body repair shop. These existing buildings total 10,741 s.f. and are currently estimated to accommodate 14 employees. The remainder of the project site has been used as an auto salvage yard since at least 1983 in association with A&G/Mission Auto Wrecking whose office is located offsite at 5939 Placencia Street. While the majority of wrecked vehicles have been removed from the property, some cars remain and the auto salvage storage yard is considered a continuing use at this time. Therefore, the aforementioned elements of the existing development onsite constitute the project's environmental baseline for the subject 4.935 acre property for the purposes of project environmental review pursuant to CEQA.

Lead Agency Contact

Name Alan Hanson
Agency City of Goleta
Phone 805 961 7549 **Fax**
email
Address 130 Cremona Drive, Suite B
City Goleta **State** CA **Zip** 93117

Project Location

County Santa Barbara
City Goleta
Region
Lat / Long 34.43° N / 119.83° W
Cross Streets Kellogg Avenue/Technology Drive
Parcel No. 071-190-034
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 101, SR 217
Airports Santa Barbara Municipal
Railways SPRR
Waterways Pacific Ocean, Goleta Slough, San Pedro Creek, San Jose Creek, Atascadero Creek, ...
Schools UCSB, Goleta Valley Junior High School, La Patera ES
Land Use

Project Issues Aesthetic/Visual; Air Quality; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 5; Regional Water Quality Control Board, Region 3; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 07/08/2011 **Start of Review** 07/08/2011 **End of Review** 08/08/2011

Note: Blanks in data fields result from insufficient information provided by lead agency.