



City of Santa Barbara California

PLANNING COMMISSION STAFF REPORT

REPORT DATE: May 31, 2007
AGENDA DATE: June 7, 2007
PROJECT ADDRESS: 601 Norman Firestone Road, Santa Barbara 93117 (MST2007-00158,
 CDP2007-00005)
TO: Planning Commission
FROM: Planning Division, (805) 564-5470
 Janice Hubbell, AICP, Senior Planner *JMH*
 Andrew Bermond, Assistant Planner *AB*

I. SUBJECT

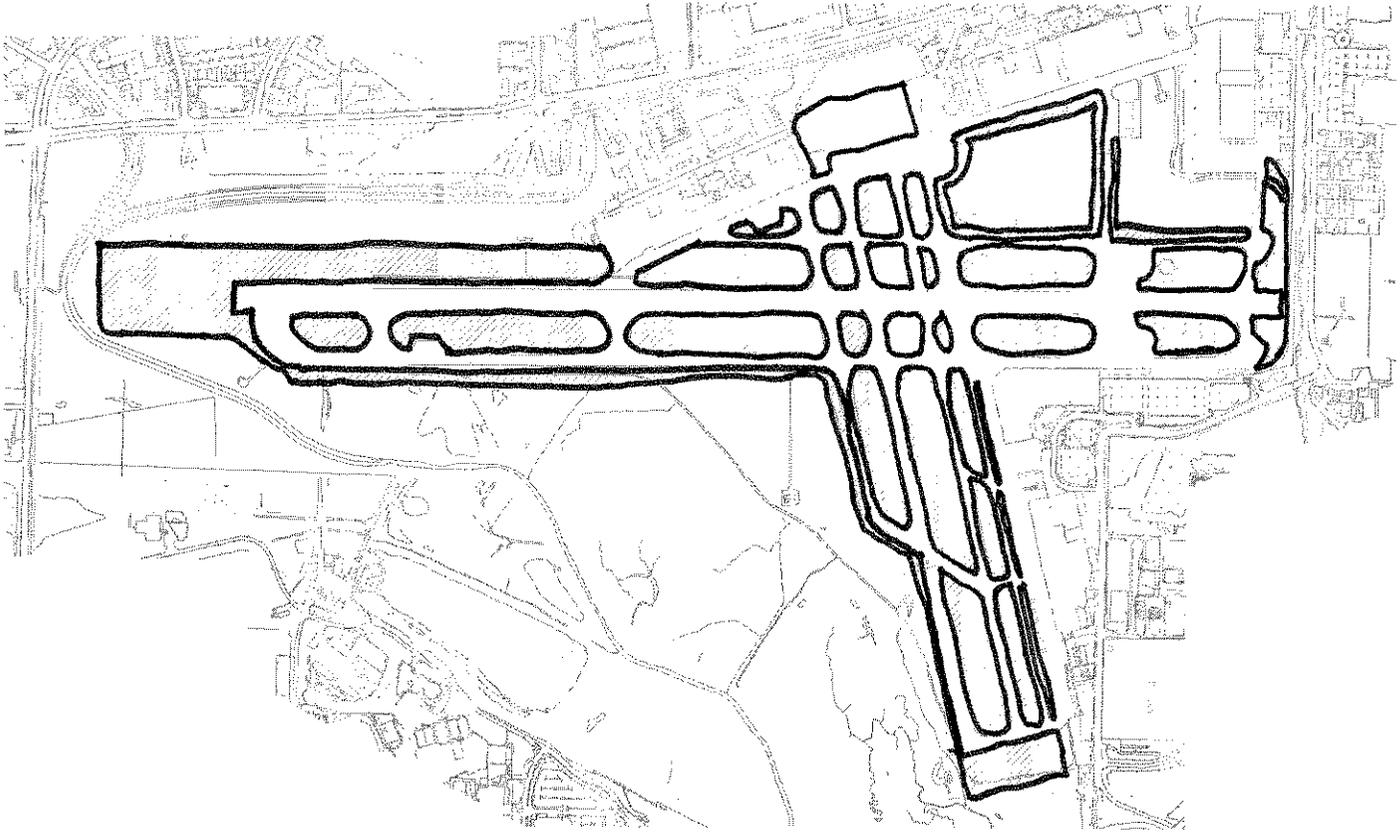
The proposed project involves renewal of Coastal Development Permit CDP97-0020 for the continued maintenance of 123 acres of Runway and Taxiway Safety Areas and adding the maintenance of approximately 30 acres of new Safety Areas recently constructed by the Santa Barbara Airport as part of the Airfield Safety Projects. The discretionary application required for this project is renewal of the Coastal Development Permit to allowed continued maintenance of Safety Areas in the Appealable Jurisdiction of the Coastal Zone (SBMC § 28.45.009).

II. EXECUTIVE SUMMARY

The City of Santa Barbara Airport Department has proposed to continue the maintenance of 123 acres of Runway and Taxiway Safety Areas at the Santa Barbara Airport, and begin maintenance of approximately 30 acres of new Safety Areas constructed or currently being constructed as part of the implementation of the Airfield Safety Projects.

It is Staff's position that the proposed project is consistent with the City's General Plan and Zoning Ordinance requirements, the City's Coastal Land Use Plan and the Coastal Act. Staff recommends that the Planning Commission approve the project.

**Figure 1: Vicinity Map of the Santa Barbara Airport
Showing Runway and Taxiway Safety Areas**



DATE APPLICATION ACCEPTED: April 30, 2007
DATE ACTION REQUIRED: June 13, 2007

III. SITE DESCRIPTION

Applicant: Owen Thomas, City of Santa Barbara
Property Owner: City of Santa Barbara
Project Address: 601 Norman Firestone Road
Parcel Number: 073-045-003
General Plan: Major Public and Institutional
Zoning: Airport Approach and Operations, A-A-O; Airport Facilities, A-F; Special District Coastal Overlay, S-D-3
Environmental Assessment: Amended Mitigated Negative Declaration (Exhibit D)
Existing Use: Airfield
Proposed Use: Airfield
Topography: Primarily flat, with minimal slopes
Access: Hollister Avenue, South Fairview Avenue, or William Moffett Place
Adjacent Land Uses:
North: Hangars and offices
South: Goleta Slough, Airline Terminal
East: San Pedro Creek, Hangars and offices
West: Goleta Slough

IV. PROJECT DESCRIPTION

The Santa Barbara Airport proposes to continue to regrade and recompact the existing 123 acres of Runway Safety Areas and Taxiway Safety Areas to maintain them in a manner that meets Federal Aviation Administration Standards and consistent with the plans approved under Coastal Development Permit (CDP97-0020). Maintenance of these Safety Areas is required under Federal Aviation Regulation (FAR) Part 139. The CDP for the initial grading and maintenance expires June 5, 2007. Runway and Taxiway Safety Areas consist of compacted earth that must be capable of bearing the weight of an aircraft in the event that it accidentally leaves the runway or taxiway. The proposed project would continue to maintain the Runway and Taxiway Safety Areas originally graded in 1997. The as-built plans for each of the Safety Areas are provided in Exhibit B.

On June 5, 1997, the Planning Commission approved CDP97-0020 which allowed the maintenance of the original 123 acres of Safety Areas present at that time for a period of 10 years. These maintenance activities resulted in the initial loss of 23 acres of Coastal Commission wetlands, including approximately two acres of Army Corps of Engineers wetlands, which were mitigated by restoration of approximately 30 acres in Goleta Slough in 1999. The 1997 permit required establishment of non-wetland vegetation in the Safety Areas. After a 10-year effort, the Airport has been unable to establish a non-native seed mix in the Safety Areas due

to the salinity of the soils and the wetland plants have continually re-established in many areas despite ongoing maintenance activities by the Airport. Rather than continue to attempt to extirpate the wetland plants in the Safety Areas, the Airport proposes as part of this renewal to allow wetland species to regenerate naturally in the Safety Areas even though they would occasionally be mowed or graded, provided that the Airport not be continually required to mitigate for impacts to wetland species. The mitigation associated with the original 1997 Safety Area Grading Project and the additional mitigation associated with the Airfield Safety Projects, has already resulted in the completion of over 75 acres of restoration in Goleta Slough, with an additional 9 acres to be completed at the end of the Tidal Circulation Experiment. The Airport has consulted with the California Coastal Commission staff and has their concurrence on the consistency of this approach with the intent of the Airport Coastal Land Use Plan and Coastal Act.

Additionally, new Runway and Taxiway Safety Areas have been constructed as part of the implementation of the Airfield Safety Projects in 2006 and 2007. These areas would need to be maintained in the future, as well.

The Airport also requests that the renewed permit be indefinite and not require renewal by the Planning Commission as considered in the letter from the California Coastal Commission dated July 25, 2005 (Exhibit H).

V. OTHER REVIEW

A. Environmental Review

A Master Environmental Assessment (MEA) check-list review was completed by City Staff and no new impacts or changes to the environment are anticipated to result from the continued maintenance. However, minor technical changes and additions to the 1997 Mitigated Negative Declaration (ENV97-0005) were necessary to update the analysis to reflect the existing setting. An Addendum to the Mitigated Negative Declaration was prepared pursuant to CEQA Guidelines Section 15164 (Exhibit D). The Addendum to the Negative Declaration evaluated the impacts associated with continued maintenance with specific attention toward wetland associated plants and concluded that the proposed project would not cause a new significant impact to the environment.

VI. ISSUES

A. Plan and Policy Consistency

1. Zoning Ordinance Consistency

The project site is located in the Aircraft Approach and Operations (A-A-O), Airport Facilities (A-F), and Coastal Overlay (S-D-3) zones. Runway and taxiway safety areas are specifically permitted in the A-A-O zone (SBMC §29.12.030A-B). Also, runway and taxiway safety areas constitute an aviation-related use as permitted in the A-F zone (SBMC §29.15.030S). Therefore the proposed use is consistent with these zones (SBMC §28.45, SBMC §29.12, SBMC §29.15).

2. Local Coastal Program Policy Consistency

The Airport is located in Component 9 of the City's Local Coastal Program (LCP). The project area is designated as a Major Public and Institutional use on the LCP land use map. The policies that pertain specifically to this area are contained in the Airport Local Coastal

Plan. The City General Plan also includes policies relevant to the project. A listing of the relevant City policies is provided in Exhibit I and is discussed below.

a. Environmentally Sensitive Habitat

Policy C-9 of the Airport and Goleta Slough LCP states that grading within or adjacent to identified wetland areas may only occur where there is no feasible less environmentally damaging alternative (Coastal Act §30233 (a)(4)). The Coastal Act of 1976 identifies halophytic (salt-tolerant) plants as wetland-associated plants and establishes their presence as sufficient for classification of a wetland.

In 1997, the Airport obtained a Coastal Development Permit for the removal of approximately 23 acres of wetlands and the removal of approximately 12,500 cubic yards of saline soil from the infield Safety Areas and replacement with non-saline fill soils. The Airport graded these areas in 1999 and seeded 27 acres with a mixture of plants that were non-native drought tolerant and saline tolerant.

Regular re-seeding with various seed mixes, including those designed to tolerate saline soils, through 2004 failed to yield sufficient ground coverage to satisfy the FAR Part 139 requirement to control dust.¹ Additionally, during this time, halophytic wetland-associated plants reemerged and soil salinity increased in approximately the same locations they had been discovered in a 1996 due to salt water intrusion from the shallow ground water table in the area.

Biological studies prepared for the Airport in 2005 and 2007 (Exhibits E and F) conclude that the re-emergent native halophytic plants are the best option for plant cover in the high saline areas, and that soil salinity in the Safety Areas is effectively uncontrollable. A letter from the California Coastal Commission dated July 25, 2005 (Exhibit H) concurs with this assessment and that additional mitigation for maintenance in these areas should not be required. Similarly, the 23 acres of new Safety Areas created by the Airfield Safety Projects have already been mitigated though additional restoration efforts in the Goleta Slough.

Previously attempted efforts demonstrate that there is “no feasible less environmentally damaging alternative” to facilitate the need to comply with FAR Part 139 requirements for a clear, compacted Safety Area. Further, this approach substantially reduces the need for herbicides in the Safety Areas and prevents the potential establishment of non-native plants from the seed mixes into surrounding areas of Goleta Slough. Additionally, this project constitutes an “incidental public service” as it is a maintenance project to sustain a public use facility. Therefore, Staff concludes that the proposed approach to Safety Area maintenance in the Runway and Taxiway Safety Areas is consistent with Policy C-9.

¹ A complete list of the Airport Department’s seeding efforts in the Runway and Taxiway Safety Areas from 1999-2006 is provided in Exhibit F.

b. Hazards

The City LCP identifies elements of floodplain management that should be implemented to minimize exposure to hazards. Section 30253 of the Coastal Act states that new development shall minimize risks in all areas of high flood and geological hazards.

The project is located in the regulatory floodway and 100-year floodplain. The proposed project would not change base flood elevation nor create any additional area of impermeable surface.

For the above reasons, the project is consistent with the applicable policies related to hazards.

c. Cultural Resources

Section 30244 of the Coastal Act and Policy 1.0 of the Conservation Element of the General Plan provide for protection of archaeological, historic, or architectural resources. Airport LCP Policy F-3 states that new development shall protect and preserve archaeological or other culturally sensitive resources. Portions of the proposed project site are known to contain archeological resources. However the project would occur in an area previously disturbed during the initial grading. Furthermore, additional excavation beyond the as-built grade is not proposed as part of this project. Any archaeological or cultural resources present at the project site would remain undisturbed *en situ*. Therefore, the project is consistent with the protection of cultural resources.

d. Visual Quality

Policy E-1 of the Airport and Goleta Slough LCP encourages development consistent with the character and quality of Santa Barbara. The focus of Policy 9.1 in the City LCP is to protect existing ocean and scenic coastal views, as is Section 30251 of the California Coastal Act. Section 30251 of the Coastal Act further states that development should minimize alteration of natural forms and be visually compatible with the surrounding area.

Grading in the runway safety areas would not substantially visually alter natural landforms. The project would not obscure ocean or coastal views nor impact the visual quality of the coastal area. Intermittent views of the coast from Hollister Avenue and Norman Firestone Road would not be affected by maintenance activities. For the reasons stated above, the project is consistent with the Visual Quality Policy E-1.

e. Floodplain

The project is within the 100-year flood zone pursuant to the City's Floodplain Management Ordinance Chapter 22.24. No change in base flood elevation is expected, and no new construction would contribute to impermeable surfaces in the project area.

VIII. RECOMMENDATION/FINDINGS

Staff recommends that the Planning Commission make the following findings for the Coastal Development Permit, and approve the project subject to the Conditions of Approval contained in Exhibit A.

Findings for the Mitigated Negative Declaration Addendum (CEQA Guidelines 15164)

1. In the Planning Commission's independent judgment there is no substantial evidence that this project will have a significant effect on the environment; and,
2. Minor technical changes and additions are necessary to complete environmental review however a Supplemental Negative Declaration is not required because the proposed project remains largely unchanged from the existing project described in the Mitigated Negative Declaration ENV97-0005.
3. No substantial changes are proposed in the project and no substantial changes have occurred with respect to the circumstances under which the project is undertaken which would require major revisions of the Negative Declaration. No new information of substantial importance shows a new or more severe impact. Additionally, no new information of substantial importance shows that a previously considered infeasible mitigation or alternative and no new mitigation or alternative that would substantially reduce the impact of the maintenance project are known to exist (CEQA Guidelines §15162(a)).
4. Pursuant to Section §15164 of the California Environmental Quality Act Guidelines, the Planning Commission adopts the Mitigated Negative Declaration ENV97-0005 and Addendum dated May 21, 2007.

Findings for the Coastal Development Permit:

The project is consistent with the policies with all applicable policies of the California Coastal Act, the City's Local Coastal plan, all applicable implementing guidelines, and all applicable provisions of the Code because:

1. Allowing wetland plants to reestablish constitutes the least environmentally damaging, feasible project that satisfies federal requirements for a compact and clear Safety Area (Airport Local Coastal Plan Policy C-9, Coastal Act Policy 30233(a)(4)).
2. The project would neither introduce nor mitigate existing risks to life and property in an area of high geologic, flood, or fire hazard. The project would be consistent with requirements imposed by the Santa Barbara County Air Pollution Control District as standard dust control mitigation measures will be applied (Coastal Act Policy 30253).
3. The project is designed to protect water quality and minimize impacts to coastal waters by incorporating measures designed to ensure that areas that provide important water quality benefits are protected (Airport Local Coastal Plan Policy C-12).
4. The project is consistent with the visual character of the surrounding area and the Santa Barbara Airport as the project will maintain existing grade and the project area will be restored with appropriate landscaping and will not obstruct important public views (SBMC Chapter 29.87, and Airport Local Coastal Plan Policy E-1).

5. The project is consistent with the uses in the Aircraft Approach and Operations (A-A-O) and Airport Facilities (A-F) zones (SBMC Chapters 29.12 and 29.15).

- A. Conditions of Approval
- B. Site and Grading Plans
- C. Applicant's letter dated April 10, 2007
- D. Addendum to Negative Declaration (ENV97-0005) dated May 17, 2007
- E. Vegetation Conditions and Dynamics in the Airfield Safety Area Report dated May, 2005
- F. Vegetation Conditions and Dynamics in the Airfield Safety Area Report dated March, 2007
- G. Summary of Maintenance Activities in the Runway Safety Areas dated March 2007
- H. Letter from the California Coastal Commission dated, July 28, 2005
- I. Relevant Policies

PLANNING COMMISSION CONDITIONS OF APPROVAL

601 NORMAN FIRESTONE ROAD
MST 2007-00158
CDP 2007-00005

In consideration of the project approval granted by the Planning Commission and for the benefit of the owner(s) and occupant(s) of the Real Property, the owners and occupants of adjacent real property and the public generally, the following terms and conditions are imposed on the use, possession and enjoyment of the Real Property:

- A. **Permit Permanence:** This Coastal Development Permit (CDP) shall be in effect from the date upon which the Planning Commission issues a Coastal Permit for this project unless maintenance activity does not commence within two (2) years of said date. This permit will be an ongoing permit that does not expire. Airport staff shall be required to submit for a CDP for any work in the Safety Areas beyond that allowed in this permit not eligible for a Coastal Exclusion. Airport staff shall maintain a record of all maintenance work in the Safety Areas which shall be submitted with the request for any future CDP along with information regarding the existence of any new endangered, threatened or candidate species for such designation.
- B. **Condition Consistency.** All conditions imposed by the Federal Aviation Administration, the U.S. Army Corps of Engineers, the California Department of Fish and Game, the California Coastal Commission and the Regional Water Quality Control Board are hereby incorporated by reference into these conditions. Where there are differences in conditions between this document and conditions imposed by other agencies, those most protective of the environment shall prevail.
- C. **Approved Development.** The development of the Real Property approved by the Planning Commission on June 7, 2007 is limited to maintenance of the Runway Safety Areas and the improvements shown on the Development Plan signed by the chairman of the Planning Commission on said date and on file at the City of Santa Barbara.
- D. **Uninterrupted Water Flow.** The Airport shall provide for the uninterrupted flow of water through the Real Property including, but not limited to, swales, natural water courses, conduits and any access road, as appropriate. The Airport is responsible for the adequacy of any project-related drainage facilities and for the continued maintenance thereof in a manner that will preclude any hazard to life, health or damage to the Real Property or any adjoining property.
- E. **Maintenance of Drainage System.** The Airport shall be responsible for maintaining the drainage system in a functioning state. Should any of the project's surface or subsurface drainage structures fail or result in increased erosion, the Airport shall be responsible for any necessary repairs to the system and restoration of the eroded area. Should repairs or restoration become necessary, prior to the commencement of such repair or restoration work, the applicant shall submit a repair and restoration plan to the Community Development Director to determine if an amendment or a new Coastal Development Permit is required to authorize such work.

- F. BMP Training.** Employee training shall be provided on the implementation of Best Management Practices (BMPs) in order to prevent or reduce the discharge of pollutants to storm water from buildings and ground maintenance. The training shall include using good housekeeping practices, preventive maintenance and spill prevention and control at outdoor loading/ unloading areas in order to keep debris from entering the storm water collection system.
- G. Storm Water Pollution Control Systems Maintenance.** The Airport shall maintain the drainage system, storm drain water interceptor and other storm water pollution control devices in accordance with the Operations and Maintenance Procedure Plan approved by the Building Official and/or the Public Works Director.
- H. California Department of Fish and Game Fees Required.** Pursuant to Section 21089(b) of the California Public Resources Code and Section 711.4 et. seq. of the California Fish and Game Code, the approval of this permit/project shall not be considered final unless the specified Department of Fish and Game fees are paid and filed with the California Department of Fish and Game within five days of the project approval. The fee required is \$1,800 for a project with a Negative Declaration. Without the appropriate fee, the Notice of Determination (which the City is required to file within five days of project approval) cannot be filed and the project approval is not operative, vested or final. The fee shall be delivered to the Planning Division immediately upon project approval in the form of a check payable to the California Department of Fish and Game.
- I. Community Development Requirements Prior to Building or Public Works Permit Application/Issuance.** The following shall be finalized prior to, and/or submitted with, the application for any Building or Public Works permit:
- 1. Contractor and Subcontractor Notification.** The Airport shall notify in writing all contractors and subcontractors of the site rules, restrictions and Conditions of Approval. Submit a copy of the notice to the Planning Division.
 - 2. Final Planning Commission Resolution Submittal.** The final Planning Commission Resolution shall be submitted, indicating how each condition is met with drawing sheet and/or note references to verify condition compliance. If the condition relates to a document submittal, describe the status of the submittal (e.g., Final Map submitted to Public Works Department for review), and attach documents as appropriate.
- I.. Building Permit Plan Requirements.** The following requirements/notes shall be incorporated into the plans submitted to any Building and Safety Division for Building permits.
- 1. Pre-Construction Conference.** Prior to commencement of maintenance grading work, a conference to review site conditions, maintenance schedule, conditions, and environmental monitoring requirements, shall be held by the General Contractor. The conference shall include representatives from the Public Works Department Engineering and Transportation Divisions, Building Division, Planning Division, the Airport, Project Engineer, Contractor and each Subcontractor.

2. **Post-Construction Erosion Control and Water Quality Plan.** Provide an engineered drainage plan that addresses the existing drainage patterns and leads towards improvement of the quality and/or rate of water run-off conditions from the site. The Airport shall install bioswales, catch basins, storm drainage interceptors or clarifiers on the Real Property, or other measures specified in the Erosion Control Plan, to intercept all sediment from the parking lot areas and other improved, hard-surfaced areas prior to discharge into the public storm drain system, including any creeks. All proposed interceptors or clarifiers shall be reviewed and approved by the Public Works Department and the Building and Safety Division. Maintenance of these facilities shall be provided by the Airport, as outlined in Condition D, above, which shall include the regular sweeping and/or vacuuming of parking areas where interceptors and clarifiers are located and a catch basin cleaning program.

3. **Conditions on Plans/Signatures.** The final Planning Commission Resolution shall be provided on a full size drawing sheet as part of the drawing sets. Each condition shall have a sheet and/or note reference to verify condition compliance. If the condition relates to a document submittal, indicate the status of the submittal (e.g., Final Map submitted to Public Works Department for review). A statement shall also be placed on the above sheet as follows: The undersigned have read and understand the above conditions, and agree to abide by any and all conditions which is their usual and customary responsibility to perform, and which are within their authority to perform.

Signed:

_____		_____
Property Owner		Date

Contractor	Date	License No.

Architect	Date	License No.

Engineer	Date	License No.

I. Implementation Requirements. All of these requirements shall be carried out in the field for the duration of the project.

1. **Construction-Related Truck Trips.** Construction-related truck trips shall not be scheduled during peak hours (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.). The purpose of this condition is to help reduce truck traffic on adjacent streets and roadways.

2. **Water Sprinkling During Grading.** During site grading and transportation of fill materials, regular water sprinkling shall occur using reclaimed water whenever the Public Works Director determines that it is reasonably available. During clearing,

grading, earth moving or excavation, sufficient quantities of water, through use of either water trucks or sprinkler systems, shall be applied to prevent dust from leaving the site. Each day, after construction activities cease, the entire area of disturbed soil shall be sufficiently moistened to create a crust.

Throughout grading, water trucks or sprinkler systems shall also be used to keep all areas of vehicle movement damp enough to prevent dust raised from leaving the site. At a minimum, this will include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency will be required whenever the wind speed exceeds 15 mph.

3. **Street Sweeping.** The property frontage and adjacent property frontages, and parking and staging areas at the construction site shall be swept daily to decrease sediment transport to the public storm drain system and dust.
4. **Best Management Practices (BMPs).** Construction activities shall address water quality through the use of BMPs, as approved by the Building and Safety Division.
5. **Equipment Maintenance.** All equipment, including trucks, shall be professionally maintained and fitted with standard manufacturers' muffler and silencing devices.
6. **Unanticipated Archaeological Resources Contractor Notification.** Prior to the start of any vegetation or paving removal, demolition, trenching or grading below a depth of 10 centimeters (approximately 4 inches), contractors and maintenance personnel shall be alerted to the possibility of uncovering unanticipated subsurface archaeological features or artifacts associated with past human occupation of the parcel. If such archaeological resources are encountered or suspected, work shall be halted immediately, the City Environmental Analyst shall be notified and an archaeologist from the most current City Qualified Archaeologists List shall be retained by the applicant. The latter shall be employed to assess the nature, extent and significance of any discoveries and to develop appropriate management recommendations for archaeological resource treatment, which may include, but are not limited to, redirection of grading and/or excavation activities, consultation and/or monitoring with a Barbareño Chumash representative from the most current City qualified Barbareño Chumash Site Monitors List, etc.

If the discovery consists of possible human remains, the Santa Barbara County Coroner shall be contacted immediately. If the Coroner determines that the remains are Native American, the Coroner shall contact the California Native American Heritage Commission. A Barbareño Chumash representative from the most current City Qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.

If the discovery consists of possible prehistoric or Native American artifacts or materials, a Barbareño Chumash representative from the most current City Qualified Barbareño Chumash Site Monitors List shall be retained to monitor all

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further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.



City of Santa Barbara

Santa Barbara Airport

www.flysba.com

April 10, 2007

Planning Commission
City of Santa Barbara
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Santa Barbara, CA 93101

Administration
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Marketing
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Engineering
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Maintenance
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Operations/Noise
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Patrol
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Planning
805.692.6023

Property Mgmt.
805.692.6022

Visitors' Center
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Fax
805.964.1380

601 Firestone Rd.
Santa Barbara, CA
93117

SUBJECT: CDP RENEWAL APPLICATION FOR GRADING AND MAINTENANCE OF AIRFIELD SAFETY AREAS AT THE SANTA BARBARA AIRPORT

Dear Commissioners:

We are requesting a renewal of Coastal Development Permit (CDP97-0020) and Goleta Slough Reserve Coastal Development Permit (CDP97-0020) to regrade and recompact the existing runway and taxiway safety areas. In order to continue to comply with Federal Aviation Administration (FAA) requirements, these areas must remain compacted, graded and maintained in such a way that should an aircraft not land or stay on a runway or taxiway, its weight would be supported safely. The safety areas at the Santa Barbara Airport are located between taxiways and runways and are at the ends of each runway. Thus the project falls within the City of Santa Barbara's appealable jurisdiction of the Airport.

A. Purpose and Need

The objectives for the project are to maintain existing airfield conditions to maximize aviation safety in accordance with Federal Aviation Administration (FAA) requirements on an as needed basis in perpetuity.

Federal Aviation Regulation (FAR) Part 139 stipulates that runway and taxiway safety areas shall be:

1. Cleared and graded and have no potentially hazardous ruts, humps, depressions or other surface variations;
2. Drained by grading or storm sewers to prevent water accumulation
3. Capable, under dry conditions, of supporting aircraft rescue and firefighting equipment, snow removal equipment and the occasional passage of aircraft without causing structural damage to the aircraft; and
4. Free of objects, except for objects that need to be located in the safety area because of their function. Objects higher than 3 inches above grade should be constructed on low impact resistant supports ("break-away" structures) of the

lowest practical height with the break-away point no higher than 3 inches above grade. Other objects, such as manholes, should be constructed at grade. In no case should their height exceed 3 inches above grade.

Additionally, FAA compaction standards require that safety areas be compacted to 90 percent of their relative maximum level of compaction.

B. Background

The Airport has been owned and operated by the City of Santa Barbara since 1942. The runways, as presently configured, were constructed by the U.S. Marine Corps during World War II. The east/west Runway 7/25 was extended to its current length of 6,052 feet in 1968. In addition to runways, there are taxiways and runway and taxiway safety areas. Runway and taxiway safety areas are unpaved areas immediately adjacent to runways and taxiways. They enhance the safety of airplanes which undershoot, overrun or veer off the runway or taxiway in an emergency and they provide greater accessibility for firefighting and rescue equipment during such incidents.

In 1997, the City of Santa Barbara issued a Coastal Development Permit and a Goleta Slough Reserve Development Permit (Exhibit A) for 123 acres of grading for the runway and taxiway safety areas. To mitigate the filling of 25.38 acres of emergent wetlands in the infield area, a 29.86-acre site on the margins of the Goleta Slough south of the airfield was restored and maintained. That permit was issued for 10 years and expires June 5, 2007.

To prevent the recurrence of wetlands in the infield, the Airport removed high saline soils during grading and seeded the area with upland plant mixes several times thereafter. The objective was not accomplished and high-salinity soils have persisted, preventing the growth of upland plants in several parts of the infield. A report on the current conditions of the Airport infield is attached (Exhibit B).

C. Existing Condition

Environment

Most of the infield area contains a relatively dense and continuous plant cover. However some areas where high-salinity soils persist are mostly barren. These locations are very similar to the locations of seasonal wetlands reported before the implementation of the Safety Area Grading project, despite the removal of 12,500 cubic feet of saline soils in 1999. Wetland-associated plants are well adapted to saline soils, and are present in these portions of the infield.

The dominant plants in the infield include non-native upland species (e.g. Mediterranean barley and clover). However Italian ryegrass and salt grass are also present. Both plants are facultative wetland plants (they are found equally in wetland

and upland environments). The presence of facultative wetland plants is sufficient to consider an area to be a wetland under the California Coastal Act.

Operations

The Airport currently maintains the safety areas on an ongoing and as needed basis. A summary of the Airport's maintenance activities since 2000 are provided in Exhibit C. The maintenance work involves grading as surface irregularities develop. The frequency and extent (area and depth of excavation) of the maintenance are performed on an as-needed basis, and are dependent on several factors, including water and wind erosion and disturbance due to jet activities and plant growth. Unusual, although possible, events such as flooding may precipitate the need to regrade the safety areas. As deficiencies in the safety area surfaces are noted, the Airport needs to remedy them in the quickest and most efficient manner possible. These deficiencies may be noted by Airport staff or FAA inspectors during annual certification inspections. With the exception of unforeseen circumstances which would require more immediate and extensive action, the Airport estimates the need to regrade anywhere from 40 to 60 acres of the infield every 3 to 5 years. Minor grading has occurred over several acres in the past 4 years. The work is similar to the initial grading, with the exception of removal of saline soils and mitigation.

The safety areas are mowed regularly to keep vegetation short and to exclude wood plants (i.e., shrubs, trees) from establishing in the area. The mowing is conducted per the Airport's *Wildlife Hazard Management Plan*, as required by the FAA. Mowing discourages use of the area by most birds considered to represent aviation hazards. Additionally, mowing minimizes fire hazards and facilitates visibility on the airfield. Mowing occurs throughout the year (weather permitting), as needed. This mowing will continue in the same manner after the initial grading of the safety areas.

Other maintenance activities that occur as needed in the safety areas include:

- Repair and rehabilitation (including replacement) of signs, drain inlets, lights, buried storm drains, and utility lines.
- Replacing soils, gravel or asphalt on runway or taxiway shoulders as they wear down.
- Replacement of signs, drains, utility lines or lights to meet new requirements and/or to improve Airport operations.

D. Proposed Grading Maintenance

The proposed project would continue to maintain the runway and taxiway safety areas as done since 1997 and would include the new safety areas created by the implementation of the Airfield Safety Projects in 2006 and 2007. The as-built plans for the grading permitted in 1997 as well as the as-built plans for the Taxiway M Safety

Area and the construction plans for the new Taxiway A Safety Area and Glide Slope Critical Area are attached. Table 1 presents the area of the existing and proposed Safety Areas included in this application and the areas of habitat restoration projects established by the previous projects to mitigate impacts associated with their construction.

Table 1: Safety Areas to be Maintained

PROJECT	CDP ISSUED	AREA	MITIGATED BY	AREA
Existing Safety Area	June 5, 1997	123 ac.	Safety Area Mitigation	29.86 ac.
New Safety Area created under the Airfield Safety Projects	June 19, 2003	15.17 ac	Area "I", Area R2, new creek bank and creek channel	32.6 ac plus 9.4 ac of tidal mudflat
Glide Slope Critical Area	June 19, 2003	14.81 ac.		

In consultation with California Coastal Commission staff, Airport staff concluded that because each of these graded Safety Areas have already been mitigated by habitat restoration projects currently underway, no additional mitigation is proposed for their maintenance. In May 2005, the Airport provided the Coastal Commission staff the "Vegetation Conditions and Dynamics in the Airfield Safety Area" Report (Appendix E of Exhibit B) completed by URS Corporation which concluded that wetland-associated plants are not likely to ever be completely removed in the infield areas despite regular maintenance and grading activities. The attached letter (Exhibit D) dated July 28, 2005 details Coastal Commission concurrence that, "no further wetland replacement mitigation will be required for the continued grading and maintenance at the previously approved Safety Area Grading Project sites."

1999 Safety Area Grading Project Areas

Exhibit E, Runway and Taxiway Safety areas, shows the extent of the safety areas on the airfield included in 1999 CDP. Additionally, it is necessary to grade the areas in between and adjacent to the safety areas in the Airport infield to ensure adequate storm water drainage per FAA standards, particularly to the inlets located throughout the infield area. Exhibit E also shows the entire work area (safety area limits and drainage areas) for which grading and compacting is proposed.

All runway and taxiway safety areas will continue to be graded as needed as part of their maintenance, with the exception of the safety area at the east end of Runway 7-25 (near Fairview Avenue). This portion, totaling approximately 4 acres, was graded more than a decade ago as part of a separate project involving construction of a paved hold apron. Therefore, approximately 123 acres of the full 127 acres that comprise the safety areas and infield are proposed to be graded over time as needed under this permit.

Equipment occasionally needs to maneuver outside the grading boundary. However such activities are limited to a maximum of 10 feet beyond the edge of the grading unit. As a result, a total of 3.5 additional acres were added to the work area, when equipment maneuvering is considered. This results in a total affected area of about 126.5 acres.

Impacts to 24.63 acres of emergent wetlands in the infield were mitigated by the Safety Area Mitigation Project - a 29.86-acre area adjacent to Goleta Slough - just south of the runways and taxiways, on Airport property. Of this 29.86-acre site, 25.38 acres was wetlands creation, including grading and planting with the remainder being enhancement or protection of existing wetland habitat. The project began in late 1999 and has completed the required 2-year maintenance and monitoring period. The restoration project has completed its in its fifth year of a five-year monitoring and reporting period mandated by the 1997 CDP and appears to have met permit criteria.

In the ten years following the implementation of the project, wetland-associated plants and soils in the safety area have persisted. Efforts to discourage wetland emergence have had limited success. It is thus unlikely that wetland-associated plants and saline soils will ever be completely removed and replaced with non-native upland plants. Therefore, this project proposes to allow native halophytic plants to provide plant cover to reduce wind and water erosion and to permit these plants to be mowed and graded over as needed to maintain the Safety Areas.

Airfield Safety Project Safety Areas

Exhibits F and G show the new 1.67-acre safety area created as part of the construction of Taxiway M in 2006 and the new 13.5-acre safety area that will be created as part of the construction of the extension of Taxiway A, the construction of Taxiway U, and the relocation of the main Runway (7/25); scheduled for construction later this year. Both of these projects implement phases of the Airfield Safety Projects, permitted in 2003.

The Glide Slope Critical Area is a 14.8 acre area that surrounds the glide slope antenna. The Glide slope is an integral part of the Airport's Instrument Landing system (ILS) which allows aircraft to land in inclement weather. The 14.8 acre Glide Slope Critical Area must be cleared and smoothly graded, much like a Safety Area, in order for the glide slope antenna to operate reliably.

As part of the Coastal Development and Goleta Slough Reserve Coastal Development Permits for the Airfield Safety Projects, impacts due to the loss of seasonal wetlands from the Taxiway M and runway relocation improvements were mitigated by the restoration of wetlands in the 12.2-acre Area "I" and R-2 Area and creek berm and creek wetland restoration projects. The Area I restoration work involves native plant restoration and enhancement of a 25-acre site located between the University of California Santa Barbara bluffs and Tecolotito Creek. It is a complex mixture of grass land; coyote brush scrub, poison oak, oak and willow trees, eucalyptus groves, and

wetlands. To mitigate for impacts of the Airfield Safety Projects 8 acres of new wetlands were created, 4 acres of existing wetlands were enhanced and exotic weeds and trees were removed from about 12 acres. The R-2 Area, south of Taxiway A, is a 4.7-acre non-tidal low-growing wetland herbs and grasses restoration site containing palustrine persistent emergent wetlands. The Tecolotito Creek berm project restored similar habitat to 15.7 acres of berms that run along the banks of the creek. Lastly the creek wetland restoration project began in the Summer of 2006 as part of the creek relocation project and involved 9.4 acres of new tidal open water and mudflat habitats.

These restoration projects are mitigation for the runway and taxiway safety areas. No additional mitigation is proposed for the maintenance of these areas.

E. Permits Requested

Airport staff requests the issuance of a Coastal Development Permit and a Goleta Slough Reserve Coastal Development Permit to allow the continued maintenance of the runway and taxiway safety areas in perpetuity. An application for a Section 404 Permit under the Clean Water Act has is not required as no area in the project site meets the federal definition of a wetland. The project site is within the Airport Facilities (A-F), Airport Approach and Operations (A-A-O), Goleta Slough Reserve (G-S-R) and Coastal (S-D-3) Zones and is designated *Major Public and Institution* and *Recreational Open Space* in the General and Local Coastal Plans. Since the project is a continuation of existing operations, no new impacts to wetland or sensitive habitat areas are anticipated. Therefore, mitigation measures beyond the restoration work already underway are not proposed for this project.

If you have any questions regarding this project, please call me at (805) 692-6018.

Sincerely,



Owen Thomas, Supervising Engineer

Attachments:

- Exhibit A – City of Santa Barbara Coastal Development Permit and Goleta Slough Coastal Development Permit # 042-97 dated June 5, 1997
- Exhibit B – URS Biological report, "Vegetation Conditions and Dynamics in the Airfield Safety Area" March 2007
- Exhibit C – Summary of Maintenance Activities in the Runway Safety Areas – Santa Barbara Airport dated March 2007
- Exhibit D – Letter from California Coastal Commission dated July 28, 2005
- Exhibit E – Safety Area Grading as-built plans
- Exhibit F – Taxiway M as-built plans
- Exhibit G – Taxiway A and Glide Slope construction plans



CITY OF SANTA BARBARA

ADDENDUM TO NEGATIVE DECLARATION (ENV97-0005) FOR EXISTING RUNWAY AND TAXIWAY SAFETY AREA GRADING PROJECT 601 NORMAN FIRESTONE ROAD, SANTA BARBARA (MST2007-00158)

May 24, 2007

This Addendum is prepared in accordance with State CEQA Guidelines Section 15164, which provides that an Addendum to a previous negative declaration may be prepared if only minor changes or additions are necessary to make the prior document adequate for the current project.

PRIOR ENVIRONMENTAL DOCUMENT

The Santa Barbara Airport proposed to regrade and recompact the existing Runway Safety Areas and Taxiway Safety Areas in order to comply with Federal Aviation Regulation (FAR) Part 139 that requires these areas be compacted, graded, and maintained in such a way that should an aircraft not land or stay on a runway or taxiway, its weight would be supported safely. The project included two additional elements:

1. Future and ongoing repair and maintenance activities in the safety areas including future grading and compaction and necessary facility repairs and improvements; and
2. Restoration, creation, and enhancement of transitional wetland habitats along the margins of the Goleta Slough near the airfield and weeding of 1.3 acres of existing wetland habitat along Ward Memorial Boulevard (SR-217) as mitigation for any impacts to wetlands resulting from the grading/compacting.

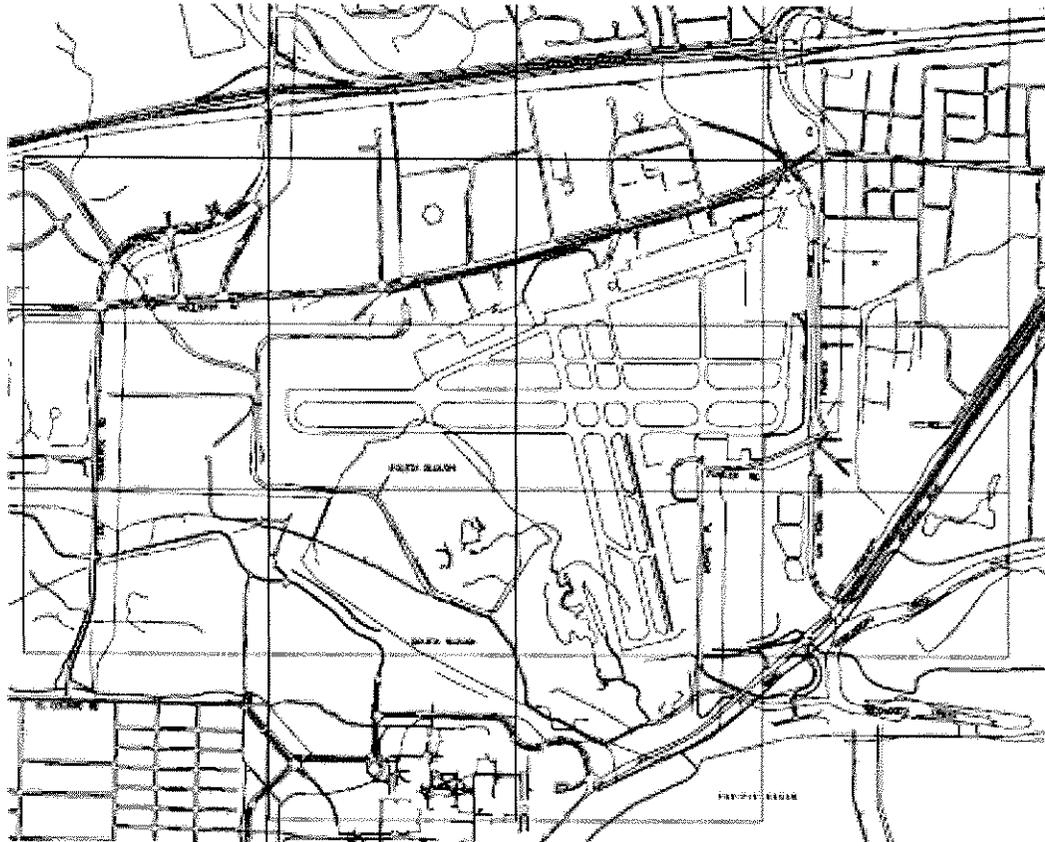
The project was separate and distinct from the Aviation Facilities Plan and Airport Specific Plan. It was the intent of the Airport to acquire long-term comprehensive permits that would avoid case-by-case permitting of future maintenance activities; enabling maintenance to occur without delay when the need is identified.

CURRENT PROJECT DESCRIPTION

The proposed project involves renewal of the Coastal Development Permit and Goleta Slough Reserve Coastal Development Permit (CDP97-0020) to regrade and recompact the existing runway and taxiway safety areas. In order to continue to comply with Federal Aviation Administration (FAA) requirements, these areas must remain compacted, graded, and maintained in such a way that should an aircraft not land or stay on a runway or taxiway, its weight would be supported safely.

This proposed grading would continue to maintain the runway and taxiway safety areas as done since 1997 and would include the new safety areas created by the implementation of the Airfield Safety Projects in 2006 and 2007. Since impacts to wetland plants were already mitigated as required by permits for the Safety Area Grading Project and the Airfield Safety Projects, no additional mitigation is proposed.

Figure 1: Vicinity Map of the Santa Barbara Airport



PROJECT IMPACTS AND MITIGATIONS

The Safety Area Grading Negative Declaration found that initial grading of the site would contribute to or result in potentially significant environmental impacts that could be mitigated to less than significant levels with respect to Biological Resources impacts associated with wetland habitat, Cultural Resources, and Water Environment. The Negative Declaration further found that initial grading would contribute to or result in adverse but less than significant environmental impacts with respect to Aesthetics, Air Quality, Biological Resources, Hazards, Transportation/Circulation and Water Environment. No other potential impacts to environmental resources resulting from the initial grading project were identified.

The project site is a functioning airfield with one east-west and two parallel cross-wind runways and associated taxiways. Since 1997, new Safety Areas have been constructed or are currently

under construction as part of the implementation of the Airfield Safety Projects, specifically the Runway 7/25 realignment, Taxiway B realignment, and Taxiway M construction. Environmental impacts associated with these projects were addressed in the Environmental Impact Report for the Aviation Facilities Plan (SCH #2000111037).

Given the developed and disturbed nature of the project site, and its location in an urban area of surrounding airport-related, and industrial and commercial land uses, the proposed project would not result in any changes in environmental effects previously evaluated in the Negative Declaration relating to, geophysical conditions, agricultural resources, or land use. In addition, because the Safety Areas are mostly unchanged from the Safety Areas graded in 1997 identified in the Negative Declaration, and because the project does not involve an intensification of land use or increased development potential of any facility previously evaluated in the Negative Declaration, the proposed project would not result in any changes in environmental effects relating to noise, population and housing, public services, recreational resources, energy supply, fire protection, or transportation/circulation.

Aesthetics

Less-than significant aesthetics impacts were identified in the Negative Declaration. However, the impact was a result of work done in and around the Goleta Slough, an identified scenic resource for the City as open space. The maintenance of the Safety Areas would not require additional mitigation in the Goleta Slough. Therefore, no impact to aesthetics is anticipated from maintenance of the Safety Areas.

Air Quality

Air quality impacts from vehicles associated with maintenance in the Aviation Facilities Plan additional Safety Areas were found to be less-than significant. The addition of 15.17 acres of Safety Area to be maintained would not in anyway affect the quantity or type of aircraft and vehicle operations associated with the previously evaluated in the Negative Declaration. Therefore, the proposed project would not result in additional aircraft use or traffic generation and resultant air quality impacts beyond that analyzed in the Negative Declaration.

Additionally, the Negative Declaration identifies only short-term impacts, stating "there would be no long-term emissions associated with the project. Neither the regrading/recompacting and ongoing maintenance, nor the wetland restoration, once completed, would induce vehicular or air traffic operations, leading to pollutant emissions." The proposed maintenance of the graded Safety Areas would constitute a continuance of the long-term maintenance work completed since 1997. Therefore the project would not generate a short-term impact as no portion of the maintenance work can be identified as short-term. Since maintenance, regrading, and recompacting activities have been infrequent and have occurred since 1997, the long-term air quality assessment found in the Negative Declaration accurately reflects the proposed maintenance project. Thus the project would cause a less-than significant impact to air quality.

Biological Resources

The Negative Declaration identified no federally recognized threatened or endangered plant or animal species known to exist in the Runway and Taxiway Safety Areas. In 2006, the federally endangered tidewater goby (*Eucycogobius newberryi*) was discovered in the nearby Goleta Slough. Given the relative distance of the Slough waterways to the Safety Areas, the proposed

continued maintenance would not be likely to affect the tidewater goby. Additionally, State-listed Belding's savanna sparrow (*Passerculus sandwichensis beldingi*) and the horned lark (*Eremophila alpestris actia*) are both known to exist in or near the Safety Areas. While the project would occasionally deplete the amount of grassland habitat for bird species, this impact would be less-than significant given the low quality of the habitat for birds and the availability of grassland habitat elsewhere on the Airport property near the Goleta Slough.

The Negative Declaration also identified approximately 23 acres of regulatory wetlands that were impacted and mitigated for under the Safety Area Grading Wetland Mitigation Project. These areas were defined as wetlands because of the presence of wetland-associated plants in the Safety Area that were removed and replaced with non-native upland plants. Additionally, 12,500 cubic yards of saline soil were removed as part of the 1997 project. Despite the removal of saline soils and of wetland plants, the objective of removing saline soils and salt-tolerant wetland plants was not accomplished and both have reemerged.

Since the completion of the initial grading and compacting in 1999, the Airport has conducted as-needed maintenance in the Safety Area. Vegetated portions of the Safety Area are mowed about two to three times pre year depending upon rainfall amounts and growth. A biological report was completed for this project in April 2007 (Attachment 3). The report concludes that the reemergence of saline soils in the portions of the Safety Areas where all saline soils were removed indicates that the wetland-associated plants in the Safety Area will never be completely removed and replaced with non-native upland plants. Additionally, California Coastal Commission staff has reviewed the report and concurred that no further wetland replacement mitigation would be required for the continued grading and maintenance at the previously approved Safety Area Grading project sites even though the continued maintenance would affect wetland-associated plants (Attachment 4). The occasional mowing and grading of these areas would be environmentally superior to removal and replacement with non-native plants as proposed as part of the 1997 project. Although mowing and grading of areas with wetland-associated plants would ordinarily constitute a significant impact, impacts to wetland-associated plants in the Safety Area were mitigated for in 2000. As a requirement of the 1997 Coastal Development Permit for initial grading and maintenance, impacts to approximately 23 acres of wetland-associated plants had been mitigated by the 30-acre, 7-year Safety Area Grading Mitigation Project completed in 2007. Therefore, impacts to wetland habitat associated with the proposed continued maintenance would be significant but have been mitigated to less-than significant levels.

Cultural Resources

The Negative Declaration found that the Safety Area Grading project would contribute to or result in potentially significant Cultural Resource impacts that could be mitigated to less than significant levels associated with potential impacts to unknown resources during construction.

No ground disturbance greater than 50 centimeters is proposed as part of the maintenance of the Safety Areas; therefore, no impacts to cultural resources are expected to result from the continued maintenance.

Hazards

The Negative Declaration addressed the presence of contaminated soils in the project area. Soils impregnated with oil were known to exist in the Safety Area Mitigation site. These soils were removed from the project area. Additionally, no further maintenance is proposed in the mitigation site. Therefore, no impacts relating to hazards are anticipated.

Water Environment

The Safety Areas are within a 100-year floodplain. However, the continued maintenance would not result in the exposure of additional people or property to flooding or other water related hazards, as identified in the Negative Declaration. City ordinances require that new construction within the Regulatory Floodway as defined by the Federal Emergency Management Agency (FEMA) not decrease the conveyance capacity. However, the proposed continued maintenance would not constitute new construction. Additionally, maintenance of constructed grades is not anticipated to decrease the conveyance capacity. Therefore, no impact to water environment relating to flooding is expected to result from the continued maintenance of the Runway and Taxiway Safety Areas.

Water quality issues associated with the continued maintenance primarily relate to erosion control to reduce sedimentation and maintaining effective storm water drainage in the Safety Areas. The Negative Declaration addressed these issues and formulated mitigation measures to reduce the effect of the construction and maintenance activities associated with the 1997 project.

In compliance with the requirements of the State Water Board's statewide general permit, the Airport currently implements and annually updates a Storm Water Pollution Prevention Plan (SWPPP). As part of the SWPPP, the Airport conducts storm water outlet inspections and storm water sampling, ensures that Best Management Practices (BMPs) are being implemented and prepares and submits annual monitoring reports to the Regional Board. The BMPs include primarily measures related to "good housekeeping," spill prevention and response and materials storage and inventory.

Since the maintenance activities proposed are largely unchanged from those studied in the Negative Declaration, continued implementation of Mitigation Measure WR-2 would result in residual less than significant impacts to water resources relating to discharge to surface waters.

Conclusion

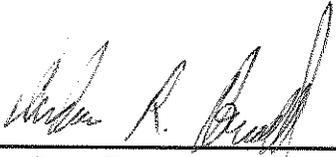
The proposed continued maintenance would not result in environmental impacts not previously identified and evaluated in the Negative Declaration. No substantial changes are proposed in the project and no substantial changes have occurred with respect to the circumstances under which the project is undertaken which would require major revisions of the Negative Declaration. No new information of substantial importance shows a new or more severe impact. Additionally, no new information of substantial importance shows that a previously considered infeasible mitigation or alternative and no new mitigation or alternative that would substantially reduce the impact of the maintenance project are known to exist.

CEQA FINDING

Based on the above review of the project, in accordance with State CEQA Guidelines Section 15164, no Subsequent Negative Declaration or Environmental Impact Report is required for the current project, because new information and changes in circumstances, project description, impacts

and mitigations are not substantial and do not involve new significant impacts or a substantial increase in the severity of previously identified impacts.

This Addendum identifies the current project changes and minor changes to project impacts. With application of identified mitigation measures, project impacts will be less than significant. This addendum, together with the Existing Runway and Taxiway Safety Area Grading Project Negative Declaration (ENV97-0005), constitute adequate environmental documentation in compliance with CEQA for the current project.

Prepared by:  _____ Date: 5/31/07
Andrew Bermond, Assistant Planner

Reviewed by: _____ Date: _____
Michael Berman, Environmental Analyst

Attachments:

1. Site Plan
2. Existing Runway and Taxiway Safety Area Grading Project Mitigated Negative Declaration.
3. Vegetation Conditions and Dynamics in the Airfield Safety Area, prepared by URS Corp. April 2007
4. California Coastal Commission letter, dated July 28, 2005.

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CITY OF SANTA BARBARA
COMMUNITY DEVELOPMENT DEPARTMENT
DRAFT NEGATIVE DECLARATION - ENV97-0005

Pursuant to the State of California Public Resources Code and the "Guidelines for Implementation of the California Environmental Quality Act of 1970," as amended to date, this Draft Negative Declaration has been prepared for the following project:

PROJECT LOCATION: 601 Norman Firestone Road

PROJECT PROPONENT: Allison Cook, Agent for the City of Santa Barbara Airport Department

PROJECT DESCRIPTION:

The Santa Barbara Municipal Airport proposes to regrade and recompact the existing Runway Safety Areas and Taxiway Safety Areas in order to comply with Federal Aviation Administration (FAA) requirements that these areas be compacted, graded and maintained in such a way that should an aircraft not land or stay on a runway or taxiway, its weight would be supported safely. The project also includes two additional elements:

1. Future and ongoing repair and maintenance activities in the safety areas including future grading and compaction and necessary facility repairs and improvements; and
2. Restoration, creation and enhancement of transitional wetland habitats along the margins of Goleta Slough near the airfield and weeding of 1.3 acres of existing wetland habitat near Ward Memorial Boulevard (S.R. 217) as mitigation for any impacts to wetlands resulting from the grading/compacting.

NEGATIVE DECLARATION FINDING:

Based on the attached Initial Study prepared for the proposed project, it has been determined that the proposed project will not have a significant effect on the environment.

Delva A. Andaleo
Environmental Analyst

9/1/97
Date

CITY OF SANTA BARBARA
COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION

INITIAL STUDY/ENVIRONMENTAL CHECKLIST ENV97-0005

SANTA BARBARA MUNICIPAL AIRPORT

EXISTING RUNWAY AND TAXIWAY SAFETY AREA GRADING PROJECT

This Initial Study has been completed for the project described below because the project is subject to review under the California Environmental Quality Act (CEQA) and was determined not to be exempt from the requirement for the preparation of an environmental document. The information, analysis and conclusions contained in this Initial Study are the basis for deciding whether a Negative Declaration (ND) is to be prepared or if preparation of an Environmental Impact Report (EIR) is required to further analyze impacts. Additionally, if preparation of an EIR is required, the Initial Study is used to focus the EIR on the effects determined to be potentially significant.

PROJECT DESCRIPTION (See Site Plan, Exhibit 1)

The Santa Barbara Municipal Airport proposes to regrade and recompact the existing Runway Safety Areas and Taxiway Safety Areas in order to comply with Federal Aviation Administration (FAA) requirements that these areas be compacted, graded and maintained in such a way that should an aircraft not land or stay on a runway or taxiway, its weight would be supported safely. The project also includes two additional elements:

1. Future and ongoing repair and maintenance activities in the safety areas including future grading and compaction and necessary facility repairs and improvements; and
2. Restoration, creation and enhancement of transitional wetland habitats along the margins of Goleta Slough near the airfield and weeding of 1.3 acres of existing wetland habitat near Ward Memorial Boulevard (S.R. 217) as mitigation for any impacts to wetlands resulting from the grading/compacting.

This project is completely separate and distinct from the Aviation Facilities Plan and Airport Specific Plan currently undergoing review. It is the intent of the applicant to acquire long term comprehensive permits that would avoid case-by-case permitting of future maintenance activities. This would allow maintenance to occur without delay when the need is identified.

FUNCTION OF SAFETY AREAS

Runway and taxiway safety areas are unpaved areas immediately adjacent to runways and taxiways. They enhance the safety of airplanes which undershoot, overrun, or veer off the runway or taxiway in an emergency event and they provide greater accessibility for firefighting and rescue equipment during such incidents.

STANDARDS FOR SAFETY AREAS

The FAA Advisory Circular, *Airport Design*, sets standards for runway and taxiway safety area design. The safety areas are centered on the runway and taxiway centerlines. The required dimensions for the runway safety area vary depending on the airplane design group (the type of airplane the runway is designed to accommodate, including wingspan and approach speed) and whether the runway has an instrument or visual approach. For instance, Runway 7/25 is designed to handle Design Group C-IV. This means that the runway handles planes with approach speeds between 120 and 140 knots (Category C) and with wingspans from 118 to 171 feet (Group IV). The taxiway safety area dimensions are based on the airplane design group (wingspan width) only. The Airport is responsible for determining the airplane design group and confirming the type of runway approach. Based on these factors, Tables 1 and 2 below list the requirements for runway and taxiway safety dimensions at the Airport:

Table 1
REQUIRED DIMENSIONS - RUNWAY SAFETY AREAS

	<i>Runway 7/25</i>	<i>Runway 15R/33L</i>	<i>Runway 15L/33R</i>
Length Off Each End (in feet)	1000	240	240
Total Width (in feet)	500	120	120
Existing Design Group	C IV	B I	B I

Table 2
REQUIRED DIMENSIONS - TAXIWAY SAFETY AREAS

<i>Taxiway Name</i>	<i>Design Group</i>	<i>Width (in feet)¹</i>
Taxiway A	IV	171
Taxiway B (south of A)	II	79
Taxiway B (north of A)	IV	118
Taxiway C	III	118
Taxiway D	IV	171
Taxiway E	II	79
Taxiway F	IV	171
Taxiway G	IV	171
Taxiway H	III	118
Taxiway J	III	118
Taxiway K	II	79
Taxiway L	II	79

¹ Taxiway safety areas do not extend beyond the ends of the taxiways, so there is no dimension for length.

The existing safety areas have the above noted dimensions in most cases, with the following exceptions. The existing width of the safety area for Runway 7/25 is 500 feet. However, the safety area currently extends 320 feet off the west end and 215 feet off the east end, not 1,000 feet. This is due to obstructions, such as creeks and paved roads. However, the existing dimensions are consistent with FAA requirements, since they are "grandfathered" by the applicable regulations. In this case, the FAA allows the Airport to maintain the safety areas at the dimensions that existed prior to January 1, 1988, when additional requirements for safety area dimensions took effect. Runways 15R-33L and 15L-33R currently have safety areas of 150 feet in width and 300 feet in length, slightly longer than the current requirements. Because they are already established at these dimensions and because the extra length and width provide an added measure of safety, the Airport proposes to regrade and recompact the existing safety area dimensions. It should be noted that lengthening the safety areas is being considered as part of the preparation of the Aviation Facilities Plan which is currently undergoing its own review.

April 4, 1997

The FAA stipulates that runway and taxiway safety areas shall be:

1. Cleared and graded and have no potentially hazardous ruts, humps, depressions, or other surface variations;
2. Drained by grading or storm sewers to prevent water accumulation;
3. Capable, under dry conditions, of supporting aircraft rescue and firefighting equipment, snow removal equipment and the occasional passage of aircraft without causing structural damage to the aircraft; and
4. Free of objects, except for objects that need to be located in the safety area because of their function. Objects higher than 3 inches above grade should be constructed on low impact resistant supports ("break-away" structures) of the lowest practical height with the break-away point no higher than 3 inches above grade. Other objects, such as manholes, should be constructed at grade. In no case should their height exceed 3 inches above grade.

Additionally, FAA compaction standards require that safety areas be compacted to 90 percent of their relative maximum level of compaction. The present condition of the Safety Areas is discussed below under Environmental Setting.

INITIAL REGRADING AND RECOMPACTING

Exhibit 3, Runway and Taxiway Safety Areas, shows the extent of the safety areas on the airfield. Additionally, the areas in between and adjacent to the safety areas in the Airport infield are necessary to grade to ensure adequate storm water drainage per FAA standards, particularly to the inlets located throughout the infield area. Exhibit 1, Site Plan, shows the entire work area (safety area limits and drainage areas) for which grading and compacting is proposed.

All runway and taxiway safety areas are proposed to be graded, with the exception of the safety area at the east end of Runway 7-25 (near Fairview Avenue). This portion, totalling approximately 4 acres, was graded a few years ago as part of a separate project involving construction of a paved hold apron and no additional work is required at this time. Therefore, approximately 123 acres of the full 127 acres that comprise the safety areas and infield are proposed to be graded as part of the initial work.

In the event that equipment may need to maneuver outside of the grading boundary, such activities would be limited to a maximum of 10 feet beyond the edge of the grading unit. A total of 3.5 additional acres may be added to the work area, when equipment maneuvering is considered. This results in a total affected area of about 126.5 acres.

Upon completion of regrading and recompacting activities, the safety areas would be reseeded with upland grass species to control wind and water erosion. Plant species that have low stature, require low maintenance, exhibit drought tolerance and possibly have decorative value would be considered.

WETLAND MITIGATION

Portions of the areas to be graded contain wetlands according to definitions used by State and Federal agencies. Creation, restoration and/or enhancement of wetlands at the Airport is necessary to meet the requirements of these agencies for obtaining permits to conduct the grading/compacting and to mitigate for wetlands impacts. This work is intended to mitigate for the loss of wetland vegetation (and unvegetated salt flats) in the safety areas as a result of the initial grading/compacting activities, such that if the wetlands were to naturally re-establish in areas where ongoing maintenance was needed, additional mitigation would not be necessary. In any case, it should be noted that it is the Airport's intent to not allow the development of new wetlands within the safety area. Past deferral of maintenance has resulted in settling and creation of depressions. This has led to the creation of the wetlands that will need to be removed and mitigated.

The term "restoration" is defined to include habitat "creation" (converting existing uplands to wetlands), "restoration" (converting degraded wetlands to more natural wetlands) and "enhancement" (improving the qualities of existing wetlands).

The main elements of the wetland restoration are to:

- Create transitional middle and high marsh habitats along the northern margins of Goleta Slough in order to recreate habitats similar to what were present along margins of alluvial fans prior to human development. This includes creating middle marsh habitats of herbaceous vegetation (i.e., green leafy plants, annuals); high marsh habitats of grassland/vegetation found on the alluvial fans; and seasonal wetlands in local depressions with saline soils (salt flats), which include sparse open vegetation.
- Remove selected artificial berms in the salt marsh and restore them to mudflats or low marsh habitats. This action would remove noxious weed sources and predator corridors and create new native habitats.
- Establish populations of one or more plants of special interest in selected portions of the newly restored areas, if available. These include primarily species of local interest and concern.

If feasible, saline soils from the safety areas would be removed during grading and transported for use at the mitigation site to facilitate plant growth. An additional 1.3 acres of wetland habitat in Goleta Slough, which are located near Ward Memorial Boulevard south of Runway 15/33, would also be weeded as a part of the mitigation plan. This area, although centrally located in the slough, is currently characterized by invasive, non-native species. This area would be weeded to remove these species and allow for growth of less competitive native plants.

The conceptual wetland mitigation plan is presented as Exhibit 4. The mitigation site is 29.86 acres adjacent to and within Goleta Slough. The affected section of Goleta Slough is just south of the runways and taxiways, on Airport property. Of this 29.86-acre site, 25.38 acres would involve wetlands creation, including grading and/or planting. Another 1.37 acres of this would involve wetland enhancement through planting and/or weeding. The remaining 3.11 acres of the site would be left as is and are interspersed within the other acres. The 29.86 acres does not include the additional 1.3 acres of weeding previously mentioned.

CONSTRUCTION METHODS

Construction methods for grading the safety area and the mitigation site, based on preliminary designs, are described below.

SAFETY AREAS

For most of the safety area, the top 2½ inches of soil would be cleared and grubbed to remove vegetation and taken off site for disposal. Some portions of the safety area contain saline soils which are proposed to be used in the mitigation site. In these areas of saline soils, no clearing or grubbing activities would occur. Instead, the saline soils, including the top layer of soil and vegetation would be excavated to a depth of six inches. This soil and accompanying vegetation would be taken from the safety area and placed at the mitigation site. The extent of saline soil may vary and could range from 15 to 23 acres. The exact amount will be determined in the field. Temporary stockpiling of this material may be necessary, depending upon the phasing of work tasks. Grading and compacting of the safety area to 90 percent of the maximum level of compaction would then occur to obtain the required surface and ensure positive drainage to the existing storm drain inlets throughout the infield area. In cases where there are no inlets, the ground would be sloped to follow existing drainage patterns. The maximum depth of cut will be about 1½ feet; the maximum amount of fill, up to one foot.

The total amount of material handled in the safety areas and at the mitigation site is estimated to range from 115,400 to 125,300 cubic yards (cy). This amount includes soil removed from the site, soil moved around the site and soil to

be imported to the site. This includes material to be cleared and grubbed (32,400 to 34,900 cy), the saline soil removed (12,300 to 18,500 cy) and 6,400 cy of oil-impregnated soil to be removed. The remainder (14,200 to 14,500 cy) would stay within the project site and be used for fill as needed. The source of the remaining material needed for fill (47,600 to 53,500 cy) is the excess soil excavated at the mitigation site (30,500 cy), supplemented by soil imported from off site (17,100 to 23,000 cy). Table 3 shows a summary of grading amounts for both the safety areas and mitigation site. The vegetation from the excavated soil at the mitigation site would be removed prior to placing it in the safety area. Note that the figures for fill are larger than those for off site excavation of material because a standard factor to account for additional losses due to shrinkage and compaction is applied. Graded and compacted areas in the safety areas would be hydroseeded with upland grasses to control wind and water erosion.

The saline soils will be applied to the mitigation site as quickly as possible. However, weather conditions or timing constraints may require that it be stockpiled temporarily. Because it is finely textured, it is highly vulnerable to wind and water erosion. Therefore, it will be necessary to protect the soil during and after its excavation and transportation and prior to its placement at the mitigation site. Any stockpiled soils would be protected by placing protective tarps over the stockpiles.

The grading has been timed to coincide with the site preparation and revegetation of the mitigation site which must be completed prior to the first winter rains (usually December). Grading of portions of the safety area would occur at night in order to avoid conflicts with Airport operations, while grading of the mitigation site will occur during the daytime.

MITIGATION SITE

Grading of the mitigation site will be conducted for purposes of improving soil conditions in order to support the target wetland habitats. Several artificial berms extend into the existing marsh and consist of fill materials overlying native marsh soil. About 1,900 linear feet of berms will either be entirely removed or lowered in order to improve water circulation and soil conditions. The remaining low mounds would support vegetation that would provide some structural variety, maintain overall habitat diversity and provide habitat for wildlife. The Adams Road berm will not be altered substantially because of the existence of two sewer mains in this berm, although deteriorated asphalt will be removed.

Most of the southern edge of the Airport adjacent to the marsh consists of fill material to a depth of three to four feet. This fill overlies native marsh and alluvial soils. Almost this entire area, about 5,200 linear feet, will be excavated and regraded to lower elevations, create more gentle grade changes with terraces and improve soil and hydrologic conditions for restored wetland habitats. Shallow depressions will be created in several locations to create new salt flat habitat similar to that now existing in the safety area. The existing drainage channels in the area will be widened slightly and the adjacent banks regraded to a more gentle slope. Most of the area will be rough graded to elevations four inches lower than the final grade in order to allow placement of the saline soils excavated from the safety area.

About 44,300 cy of material will be excavated from the mitigation site. Of this, a small portion (about 7,400 cy) will be used as fill in the area. An additional 30,500 cy will be exported to the safety area for use as fill. Finally, there is an area of barren soil at the end of the old diagonal runway that is impregnated with oil, apparently from a natural source. This area covers nearly an acre. Based on an analysis of the soil samples from this area, the Santa Barbara County Hazardous Materials Unit determined that there is no need for any remedial action in the area (see Exhibit 5). However, the oil may be inhibiting vegetation establishment. For that reason, soils in this area will be excavated to a depth of four feet, the apparent depth of the oil-impregnated soils. These soils, about 6,400 cy, will be disposed of properly off site by the contractor and/or the Airport. See Table 3 below for a summary of the grading for both the safety area and mitigation site.

Table 3 Summary of Project Grading Amounts		
	Minimum (cubic yards)	Maximum (cubic yards)
SAFETY AREA GRADING		
Export from clearing and grubbing to off site	34,900	32,400
Export saline soils to mitigation site	12,300	18,500
Import fill soils from off site	17,100	23,000
Soil excavated and replaced on site	6,800	7,100
MITIGATION SITE		
Export fill soils to safety area	30,500	30,500
Export oil-impregnated soils off site	6,400	6,400
Soil excavated and replaced on site	7,400	7,400
TOTAL GRADING	115,400	125,300

EQUIPMENT, ACCESS POINTS, TRAVEL ROUTES AND STORAGE AREAS

Information on the types of equipment, access points, travel routes and storage areas are not usually defined at this point in the review and approval process for projects. However, because of this project's nature, staff believes that it is important to have enough information to assess potential construction impacts resulting from the project.

A grader, loader, roller, dump trucks and water trucks are expected to be used during construction.

Travel routes to and from the project site would include Norman Firestone Road, William Moffett Place/James Fowler Road, Hollister Avenue and Fairview Avenue, depending upon the precise location on the airfield the vehicle/equipment is located or would like to access. Vehicles travelling north or south on U.S. 101 would either use the Fairview Avenue or Los Carneros Road offramp and, in some cases, may use S.R. 217 (Ward Memorial Boulevard). Vehicles would avoid using the Fairview/Hollister intersection during peak travel periods.

Specific locations for vehicle access, equipment storage and material stockpiles will be identified in the final plans for the project. Preliminary locations, shown on Exhibit 6, are described as follows:

Access to the airfield would be provided at several locations:

- At the gate along William Moffett Place, south of the parallel runways. An existing gravel access road runs adjacent to this gate.
- At the northeast corner of the airfield, near the Santa Barbara Aerospace ramp via Robert Marxmiller Place.
- From the U.S. Forest Service ramp via the existing gravel access road running past the glide slope instrument and continuing west, south and then east around the perimeter of Runway 7/25.

The following areas are proposed for possible materials stockpiling:

- At the northeast corner of the Airport, just northwest of Santa Barbara Aerospace.

- Along the western edge of William Moffett Place south of the fenced parking area near the end of the parallel runways and north of the area zoned Goleta Slough Reserve.
- The vacant area east of Building 345, near the Airport maintenance yard.
- Areas in the infield (grassy areas between runways and taxiways), providing work phasing, FAA height restrictions and sensitive habitat considerations do not preclude such locations.
- The vacant drive-in theater parking lot, north of Hollister Avenue (only in the event other locations are full or unavailable, due to its distance from the project site).

Equipment may be stored in any or all of the following areas depending on construction timing, FAA height restrictions and sensitive habitat considerations:

- All of the areas noted above for material stockpiling.
- Areas adjacent to the existing airfield perimeter access road near the radar station (ASR) building, providing sensitive habitats are avoided.
- Areas south of Taxiway A, near the north end of the ASR road, providing sensitive habitats are avoided.

FUTURE REPAIR AND MAINTENANCE

The Airport anticipates the need to maintain the safety areas on an ongoing and as needed basis, once the initial re-grading and recompacting is completed. The maintenance work would involve grading as surface irregularities develop. The frequency and extent (area and depth of excavation) of the maintenance are not known and are dependent on several factors, including water and wind erosion and disturbance due to jet activities and plant growth. Unusual, although possible, events such as flooding similar to what occurred in January and March of 1995, may precipitate the need to regrade the safety areas. As deficiencies in the safety area surfaces are noted, the Airport would need to remedy them in the quickest and most efficient manner possible. These deficiencies may be noted by Airport staff or FAA inspectors during the annual certification inspection. With the exception of unforeseen circumstances that may arise which would require more immediate and extensive action, the Airport estimates the need to regrade anywhere from 40 to 60 acres of the infield every 3 to 5 years. The work would be similar to that described above for the initial grading, with the exception of removal of saline soils and mitigation.

The safety area is mowed regularly to keep vegetation short and to exclude woody plants (i.e., shrubs, trees) from establishing in the area. The mowing is conducted per the Airport's *Wildlife Hazard Management Plan*, as required by the FAA. Mowing discourages use of the area by most birds considered to represent aviation hazards. Additionally, mowing minimizes fire hazards and facilitates visibility on the airfield. Mowing occurs throughout the year (weather permitting), as needed. This mowing will continue in the same manner after the initial grading of the safety area.

Other maintenance activities that would occur as needed in the safety area include the following:

- Repair and rehabilitation (including replacement) of signs, drain inlets, lights, buried storm drains and utility lines.
- Replacing soils, gravel or asphalt on runway or taxiway shoulders as they wear down.
- Replacement of signs, drains, utility lines or lights to meet new requirements and/or to improve Airport operations.

SCHEDULE

The initial regrading/recompacting of the safety areas, as well as the construction of the wetland mitigation site, is expected to begin in July 1998 and last for 6 months. In the event that more than 6 months would be required, work may begin in May 1998. This means that work would potentially occur during the rainy season. However, it is better to extend slightly into the rainy season than to split the work into two years. These dates are contingent upon obtaining agency permits and other approvals. Both elements would be implemented concurrently. The future repair and maintenance activities to occur in the safety areas would occur as needed at a later date, after implementation of the initial regrading/recompacting and the wetland mitigation.

MITIGATION SITE MAINTENANCE AND MONITORING

Maintenance of the mitigation site would occur for two years following the grading and planting of the site. Monitoring and reporting of performance would be conducted for an additional 5 years following the maintenance period. Maintenance and monitoring would be based upon performance standards established as part of the Wetland Mitigation Plan.

MAINTENANCE ACTIVITIES

The two year maintenance period would begin immediately after the contractor has completed the implementation of the wetland restoration. To receive final acceptance of the restoration, the mitigation site would be inspected and approved by the Airport and a qualified restoration specialist/biologist involved in the design and/or implementation of the wetland mitigation plan.

During the two year maintenance period:

- The contractor will conduct routine activities to maintain the plantings and seeded areas in a healthy condition and control erosion of the site.
- The mitigation site will be inspected by the Airport and a qualified restoration specialist/biologist for necessary repair or remedial measures a minimum of four times a year.
- At the end of the maintenance period, the Airport and the restoration specialist/biologist will conduct a final inspection. Any outstanding items will need to be completed prior to final approval by the Airport and acceptance of the restoration.

Maintenance activities will include routine watering, replanting or reseeding, repair of damaged areas, weeding, remedial erosion control and removal of excess sediment from areas if the sediment has clearly eroded from the mitigation site. Maintenance activities would also include weeding the 1.3 acre site near Ward Memorial Boulevard.

MONITORING METHODS, FREQUENCY AND DOCUMENTATION

During the five year monitoring period that follows the two year maintenance program, typical plant vegetation sampling methods will be used. For example, plant species composition and percentages would be determined for the mitigation site by placing sampling plots throughout the site and recording relevant data, such as:

- Species occurring within the plot, the species wetland indicator status and whether the species is native or introduced.
- Percent plant cover.
- Depth of water or depth to saturated soil.

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- Soil salinity and pH at surface and at 12 to 15 inches below grade.

Qualitative information about weather and mitigation site conditions will also be collected. There will also be permanent photo-documentation points established. Color photographs will be taken from the same point each year to assist in documentation of mitigation status.

Based on the findings of the annual monitoring report, additional weeding could occur if necessary to meet the performance goals for plant cover and species diversity.

REPORTING AND SCHEDULE

A report on the condition of mitigation site vegetation would be prepared at the end of the two year maintenance period. During the 5-year monitoring period, annual reports describing the results of mitigation monitoring would be submitted to the U.S. Army Corps of Engineers (Corps) and other interested agencies before the end of each November.

The annual monitoring reports will contain the following information:

- A quantitative analysis of attainment of annual performance standards and progress toward meeting final performance standards.
- A list of names, titles and affiliations of persons conducting the monitoring and preparing the report.
- A copy of the Corps and other agency permits, including special conditions and any letters of modification.
- Photographs taken at photo-documentation points.
- Relevant maps.
- Summary results of previous years' monitoring.

The Airport will notify the Corps and other appropriate agencies when it appears that the final performance standards have been met. The Corps will conduct a site visit to confirm that final performance standards have been met. If the performance standards are met, the Airport would no longer have any responsibilities for maintenance or monitoring of the mitigation site for wetland restoration purposes.

CONTINGENCY PLANS

Contingency plans have also been incorporated into the Wetlands Mitigation Plan. Unforeseen circumstances could occur which could cause delays in the implementation of wetland restoration (such as insufficient seeds and plant materials) or could cause failure to meet the performance standards within the seven year maintenance and monitoring period (flooding and erosion, poor plant establishment, weed infestation). These include regrading and revegetation, if necessary. However, there would be no obligation to replace flood or erosion damaged wetlands more than once or after the seven year maintenance and monitoring period.

APPLICANT/PROPERTY OWNER NAME AND ADDRESS

Allison Cook, Agent for the City of Santa Barbara Airport Department
601 Norman Firestone Road
Goleta, CA 93117

(805) 967-7111 x223

PROJECT ADDRESS/LOCATION (See Vicinity Map, Exhibit 2)

601 Norman Firestone Road

ENVIRONMENTAL SETTING

The project area is generally flat in appearance, with at most a two to three percent grade to facilitate drainage. The area consists of the runways, taxiways and their associated safety areas, along with the mitigation site on the edge of the present day boundary of Goleta Slough. More detail regarding the setting for the safety areas and mitigation site is provided below.

RUNWAY AND TAXIWAY SAFETY AREAS

The safety areas are presently characterized by irregular surfaces (i.e. humps and depressions), caused by water, wind, vegetation and jet activity. The safety areas have been identified by both FAA and Airport staff as needing to be smoothed and compacted. The irregularities range from 4 inches to 1 foot throughout the safety areas.

During the annual inspection in 1991, FAA personnel identified humps and depressions in the safety areas of Runway 7-25. The FAA staff noted that these areas needed to be leveled, filled and compacted. Airport staff responded to this identified compliance deficiency by proposing that the irregular surfaces be addressed in a 2-step process. Obvious surface irregularities in a few isolated locations away from sensitive habitats were corrected immediately. Since this sporadic and incremental method would be infeasible and insufficient to bring all of the safety areas into compliance (especially given the need to ensure proper drainage and compaction throughout), the long term solution proposed was for a full grading effort.

Since 1991, FAA certification inspectors have identified additional areas throughout the airfield safety areas as needing to be graded. Airport staff has also noted several locations in the safety areas containing surface irregularities. Most recently, Airport staff conducted a survey of all safety areas (May 1996) and found significant surface irregularities throughout the infield. These irregularities are widespread, such that a comprehensive grading effort to ensure smooth, compact surfaces and to maintain adequate drainage would be required. There are a few very small locations scattered throughout the safety area that have only minor surface irregularities. However, these areas are so small in size and surrounded by areas requiring maintenance such that they would need to be graded and compacted anyway. This grading and compacting would be necessary to ensure a smooth transition from those areas that need grading due to significant irregularities and to ensure proper drainage.

The safety areas have been in existence since the construction of the runways and taxiways. They are mowed regularly for safety purposes (visibility, fire hazards, wildlife hazards, etc.). Irregular surfaces in particular locations of the safety areas have been periodically graded and compacted in the past. However, comprehensive grading throughout the safety areas has not been done for the past several years. Since the safety areas are pre-existing and have been maintained in the past to some extent, the currently proposed grading is considered a rehabilitation of the existing safety areas.

MITIGATION SITE

The mitigation site is located in the southwest triangle between Runways 7/25 and 15/33. Portions of the mitigation site are used for Airport operations, as follows:

- A 12 foot wide gravel service road traverses the inner edge of the mitigation site. It is used for routine Airport inspections and access. It will be retained in the mitigation site, although a portion of it will be relocated to the northeast to provide more restoration area.

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- A radar station (ASR building) is located near the mitigation site and is regularly accessed by FAA personnel. This building will be retained.
- There are several storm drain outlets at the mitigation site that convey storm water from the Airport to tidal channels in the Slough. There are two major channels that convey this runoff to Tecolotito Creek: Foxtrot Drain and the ASR Drain. These drains will be retained, although they will be widened slightly to facilitate habitat restoration.
- The Goleta Valley Vector Control District has historically used a dirt access road that traverses the center of the Slough. This road is in disrepair and only provides limited access at this time. It will remain in place for continued use by the District.

In addition to these Airport facilities, there are several buried utility lines that occur along the Airport access road, including: (1) buried 18" and 24" sewer mains from Goleta West Sanitary District; (2) a 16" high pressure gas line owned by the Southern California Gas Company; (3) an 8" abandoned sewer line; and (4) a 6" Airport sewer line. There are easements for each of the active utility lines which allow for inspection, repair and replacement of the lines by the appropriate utilities.

Elevations at the mitigation site range from 5 to 8 feet above mean sea level (MSL). The 5 foot contour represents the limit of the highest tides in Goleta Slough. This results in the mitigation site being above tidal influence. The site is mostly level or slightly sloped to the Slough. The site often has abrupt and steep transitions from the fill material to the adjacent natural salt marsh areas, with vertical drops of 3 to 6 feet. The mitigation site receives water primarily from direct percolation, with a minor amount of runoff from Taxiway A and Runway 33L/15R.

The mitigation site contains a mixture of upland and wetland vegetation types; however, the site is dominated by introduced grasses and weeds.

PROPERTY CHARACTERISTICS

Assessor's Parcel Number:	73-080-37	General Plan Designation:	Institutional (Airport), Open Space
Zoning:	Airport Facilities (A-F), Airport Approach and Primary Surface (A-A-P), Goleta Slough Reserve (G-S-R) and Coastal Overlay (S-D-3) Zones	Parcel Size:	826.24 ± acres
Existing Land Use:	Airport runways, taxiways, safety areas and degraded wetlands and uplands	Proposed Land Use:	Airport runways, taxiways, safety areas and wetlands with good functions and values
Slope:	Mostly flat, averaging 2% to 3%, with occasional sharp 3' to 6' dropoffs in the mitigation site area.		
Surrounding Land Uses:			
North:	Airport facilities, USFS fire suppression operations, fixed base operators, control tower and other facilities south of Hollister Avenue		
South:	Goleta Slough and University of California, Santa Barbara		
East:	Fairview Avenue, Airline Terminal, Mercury Air and other miscellaneous uses and William Moffett Road		
West:	California Department of Fish and Game property, Goleta Slough and uplands, Los Carneros Road		

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PLANS AND POLICY DISCUSSION

The project site is located at the Airport and has a General Plan and Local Coastal Plan designation of Institutional and Open Space. Part of the site is zoned A-F, A-A-P and S-D-3 (Airport Facilities, Airport Approach and Primary Surface and Coastal Overlay Zones). A portion of the site is zoned A-A-P, G-S-R and S-D-3 (Airport Approach and Primary Surface, Goleta Slough Reserve and Coastal Overlay Zones). The remainder of the site is zoned G-S-R and S-D-3 (Goleta Slough Reserve and Coastal Overlay Zones). See Exhibit 7 for a zone map of the project area. The site is partially in the Coastal Commission appealable jurisdiction (primarily in the safety area) and partially in the original jurisdiction of the California Coastal Commission (primarily in the mitigation site). The required discretionary actions are a Coastal Development Permit from the City and a Coastal Permit from the Coastal Commission. The project must be found consistent with the City of Santa Barbara General Plan, the California Coastal Act and the Local Coastal Plan (both City-wide and Airport-specific policies).

A discussion of the project's consistency with the applicable policies follows.

GENERAL PLAN

CONSERVATION ELEMENT:

There are several Conservation Element policies that apply to this project. They are in the areas of Visual Resources, Biological Resources and Drainage and Flood Control.

Under Visual Resources, the Goals and Policies require the protection of important scenic resources and open space areas in the City. One of the named open spaces is Goleta Slough.

Except during the construction period, the maintenance of the safety areas and the restoration of the wetland south of Runway 7/25 will not result in an adverse impact on the scenic or open space values in this area. The visual change will be minimal. There will still be grasses in the safety areas and the mitigation site will be restored to more natural habitat with many fewer invasive plant species.

Therefore, the project is **potentially consistent** with the Visual Resources goals and policies.

Under Biological Resources, the Goals, Subgoals and Policies require that the City's critical ecological resources be enhanced and protected with special emphasis on the preservation and enhancement of Goleta Slough, protection and enhancement of the habitats of threatened and endangered species and the maintenance and enhancement of intertidal and marine resources.

While salt flat habitat in the safety areas will be lost as a result of the project, its loss will be mitigated by the creation of new habitat at the mitigation site. The new habitat will have greater functions and values than does the existing and will provide a needed transition between upper and lower Slough functions. In addition, low grassy habitat will be replaced in the infield and will continue to be available for use by small birds, including the horned lark (a State Species of Concern). While there are sensitive animal species in the area, it appears that impacts will be minimal and may, in fact, be beneficial over the long term. On that basis, the project is **potentially consistent** with the Biological Resources goals, subgoals and policies. More detail is included in the Biological Resources section of the Initial Study below.

Under Drainage and Flood Control, the goals require that the City ensure that human habitation in floodplains does not adversely affect public health, safety and welfare. Recreation, conservation and open space uses are also encouraged in floodplains.

This project is entirely in the floodplain. However, because Airport operations cease during major flood events, public health, safety and welfare are protected. The area outside the runways will

remain in open space. On that basis, the project is **potentially consistent** with Drainage and Flood Control goals.

CITY-WIDE LOCAL COASTAL PLAN (LCP):

LCP Water and Marine Environment Policies 6.1, 6.2, 6.8, 6.9 and 6.10 require the protection, restoration and enhancement of biotic communities in the Coastal Zone through a variety of means, including maintenance of good water quality and the use of setbacks to buffer such resources from development.

The proposed project includes creation of new habitat with greater wetland functions and values than that of the habitat lost by regrading the runway and taxiway safety areas. In addition, there will be a net increase in wetland from 22.94 acres to 28.49 acres plus an additional 1.3 acres will be weeded to improve habitat. Water quality will continue to be maintained as required by the City's NPDES permit with the Regional Water Quality Control Board. In addition, during construction, the Airport will prepare and carry out a spill prevention and containment plan and follow all Best Management Practices in order to reduce potential impacts on the Slough. On that basis, the project is **potentially consistent** with these Water and Marine Environment policies.

LOCAL COASTAL PLAN - AIRPORT AND GOLETA SLOUGH COMPONENT:

Environmentally Sensitive Habitat Policies:

The Airport component of the LCP has several Environmentally Sensitive Habitat policies that pertain to this project. Policy C-4 requires a buffer strip of 100 feet from the edge of sensitive habitat shown on a habitat map in the Airport LCP (Exhibit 8). The policy goes on to state that existing facilities necessary to Airport operations within the buffer area shall be retained and maintained in a normal fashion.

The habitat map indicates that there are salt flats within the Safety Area between Runway 7/25 and the taxiway to its south. In addition, this map shows salt flats immediately south of this taxiway. While this map is still the official LCP wetland map of the Airport area, it is effectively superseded by the habitat delineation completed by Woodward-Clyde Consultants (WCC) in 1995. This new map shows a much greater amount of wetland area subject to Coastal provisions than does the adopted habitat map. In any case, there is a substantial amount of existing wetland vegetation that is within 100 feet of the safety areas. This habitat will continue to be within 100 feet of the developed area. Because the safety areas are existing and maintenance of these areas are a necessity for safe Airport operations, the project is **potentially consistent** with this policy.

Policy C-5 calls for the reduction of Slough sedimentation.

While this project does little to reduce Slough sedimentation, it does not increase sedimentation. Therefore, the project is **potentially consistent** with this policy.

Policy C-6 requires the maintenance of tidal action in order to maintain marine organism populations.

Tidal action will not be affected by this project. The Airport does not wish to encourage additional tidal action within either the safety areas or the mitigation area because increased tidal action may result in additional ponded areas close to the runway. The primary concern would be if freshwater ponding were created because it would be standing water. Waterfowl and gulls loaf and feed in such areas and are primary causes of bird strikes, which is hazardous to the safety of aircraft operations. Ponding that occurs from tidal action drains at low tide and is eventually converted to salt marsh habitat that does not draw waterfowl and gulls. Because the project does not affect and will, in fact, maintain existing tidal action, it is **potentially consistent** with this policy.

Policy C-8 prohibits new uses that are incompatible with the protection and maintenance of wetland habitats in the Slough.

This project does not involve a new use; it involves maintenance of the existing safety areas. Maintenance includes periodic grading in order to meet the standards required by the FAA Regulations. Therefore, it is **potentially consistent** with this policy.

Finally, Policy C-9 requires that development in or adjacent to wetland habitat be consistent with Coastal Commission policies 30230, 30231, 30233 and 30607.1. In addition, within sensitive habitat areas, the approval of any restoration project which contains project elements which are not specifically permitted under Coastal Act Section 30233 shall occur only after the California Department of Fish and Game (CDFG) makes the finding, under Section 30411, that the wetland is so severely degraded that major restoration which might include other uses not specifically permitted under 30233 is necessary and will have the primary effect of restoring the degraded area.

The discussion of policy consistency for the Coastal Act policies 30230, 30231, 30233 and Section 30607.1 (below) shows that the project is potentially consistent with those policies. In addition, also as discussed below, it appears that the CDFG will be able to make the findings under Section 30411 that will allow this project to proceed. The project is **potentially consistent** with this finding, pending CDFG review and comments.

New Development Policy:

Policy H-1 requires that new development "not result in adverse impacts to the wetland habitats of the Goleta Slough, related stream tributaries, or sensitive habitat areas due to additional sedimentation, runoff, or other disturbances."

While there will be short term impacts related to potential sedimentation, runoff and accidental spillage of hazardous materials during construction, there will be no long term adverse impacts on wetlands and other sensitive habitats due to the mitigation plan included in the Project Description. In addition, measures are proposed during construction that would mitigate potential sedimentation, runoff or other disturbances, such as accidental spills. Therefore, the project is **potentially consistent** with this policy.

CALIFORNIA COASTAL ACT:

Protection, restoration and enhancement of coastal wetlands is a cornerstone of the California Coastal Act. There are a variety of Coastal Act policies which apply to this project.

Policy 30230 (Marine Environment) of the Coastal Act requires that marine resources be maintained, enhanced and restored. The policy further requires that special protection be given to areas and species of special biological or economic significance. It further requires that uses of the marine environment be "carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms."

While Goleta Slough itself is an area of special biological significance, the safety areas within the Airport operations area are not tidally influenced, and because of their degraded nature and isolation have relatively low functions and values. The proposed project includes restoration of 29.84 acres of wetland outside the Airport operations area and within Goleta Slough. Therefore, the project is **potentially consistent** with this policy.

Policy 30231 (Marine Environment) requires that the biological productivity and quality of streams, wetlands and estuaries be preserved in order to maintain optimum populations of marine organisms and to protect public health. The policy also calls for restoration, where feasible, of these habitats through a variety of methods.

Because of the existing wetlands' location within the safety areas where periodic mowing occurs and long term maintenance will be required, it is not possible to "maintain optimum populations of marine organisms." The existing habitat is not marine. However, the habitat will be re-created and enhanced in the area south of the runway where it is possible to meet the intent of the policy. Therefore, this project is **potentially consistent** with this policy.

Policy 30232 (Marine Environment) requires that the marine environment be protected against spillage of petroleum products and other hazardous substances and that procedures for cleaning up accidental spills be provided.

As discussed under Biological Resources and Risk of Upset, a Storm Water Pollution Prevention Plan will be prepared and implemented to reduce the potential for spills during construction and to establish procedures to follow in case such a spill should occur. Therefore, the project is **potentially consistent** with this policy.

Policy 30233 (Marine Environment) prohibits the diking, filling or dredging of wetlands and estuaries unless "there is no feasible less environmentally damaging alternative and where feasible mitigation measures have been provided to minimize adverse environmental effects." Subsection (a) of this policy indicates that the uses that are allowed under these conditions are very limited and include the following: (1) new or expanded port, energy and coastal dependent industrial facilities; (2) maintenance or restoration of existing dredged depths in existing navigational channels and other related facilities used by boats; (3) boating facilities in degraded wetlands and new entrance channels in wetlands, subject to findings outlined in Section 30411; (4) incidental public service purposes such as installation and maintenance of public utilities; (5) mineral extraction, except in environmentally sensitive areas; (6) restoration purposes; and (7) nature study, aquaculture and similar resource dependent activities. Subsection (b) of this policy also requires that dredging and spoils dispersal be planned and carried out to avoid significant disruption of wildlife habitats and water circulation. Subsection (c) further requires that any diking or filling that occurs in existing wetlands be carried out in such a way as to maintain or enhance the functional capacity of the affected wetland.

The existing wetlands in the safety areas are degraded as a result of the translocation of wetland soils from other areas at the Airport, isolation from other functional wetlands, circumscription by the Airport runways and infestation with nonnative plant species. The functions and values of the new wetland at the mitigation site will be greater than those of the existing habitat to be impacted in the safety areas. In addition, there is no feasible alternative to maintaining the required runway safety areas given the location and configuration of the existing runways.

In regard to Section 30233(b), saline soils from the grading of the safety area would likely be used to restore the wetlands in adjacent areas. Any excess spoils would be transported off site.

In regard to Section 30233(c), the result of the proposed wetland recreation and enhancement will be an improvement of Goleta Slough functions and values. The restoration will provide a more natural transition from the upper to the lower Slough elevations. In addition, the new wetlands area will be connected to the Slough, unlike the existing habitat to be graded. Finally, large areas of invasive, non native vegetation will be replaced with native vegetation and habitat will be recreated that was historically present in the Slough.

On the basis of the above discussion, the project is **potentially consistent** with this policy.

Policy 30240 (Land Resources) requires that environmentally sensitive habitat areas be protected against significant disruption of habitat values and that only uses dependent upon these resources are allowed. It also requires that development adjacent to such areas be sited and designed to prevent impacts that would degrade these areas and, in fact, be designed to allow for the continuance of the habitat.

While a certain amount of degraded environmentally sensitive habitat will be lost as a result of the project, it will be replaced by habitat with greater habitat values. The safety area wetland to be lost consists of 22.94 acres degraded salt flats and wetland vegetation. The recreated and enhanced wetland will involve 28.49 acres of wet grasslands, pickleweed and salt flat habitats. An additional 1.3 acres of wetlands will be weeded to remove invasive non native plant species. The safety area grading project is also designed to prevent future impacts to the restored wetland. Therefore, this project is **potentially consistent** with this policy.

Policy 30251 (Development) requires that the scenic and visual qualities of coastal areas be protected.

As discussed under the City Conservation Element above, while there will be short term concerns about visual resources during project implementation, in the long term, there will be no impacts on visual resources. Therefore, this project is **potentially consistent** with this policy.

Policy 30253 (Development) requires that new development minimize risks to life and property in areas of high geologic, flood and fire hazard and that said development does not contribute to such hazards. It also requires that development be consistent with Air Pollution Control District (APCD) requirements and minimize energy consumption and vehicle miles travelled.

This project's primary purpose is to minimize risk to the flying public. In addition, the project will have no effect on geologic, flood or fire hazards. Finally, as discussed below, the project will meet all APCD requirements and will not result in any long term increase in vehicle miles travelled. On that basis, this project is **potentially consistent** with this policy.

Section 30411 of the Coastal Act contains findings, normally applicable only to the development of boating facilities in degraded wetlands, but applicable by certification of the Airport Component of the LCP to wetland restoration projects at the Airport that also include other project elements that are not specifically allowed by Policy 30233 above (such as maintenance of existing safety areas). In order for such projects to proceed, the following findings must be made: (1) the wetland is so severely degraded and its natural processes so substantially impaired that it is not capable of recovering and maintaining a high level of biological productivity without major restoration activities; (2) no less than 75% of the degraded wetland can be restored and maintained as a highly productive wetland in conjunction with such a project; and (3) restoration of the wetland's natural values can most feasibly be achieved and maintained in conjunction with such a project as opposed to other means.

The existing 22.94 acres of salt flats and wetland vegetation within the safety areas is severely degraded. It will not be possible to restore these wetlands in the safety area because of the need to mow periodically and maintain the required safety areas. However, more than 75% of the area of the wetlands can be restored within the mitigation site as a highly productive wetland that is better integrated with overall Slough functions and values rather than being separated from the Slough as are the existing wetlands. This will include 29.86 acres of recreated and enhanced habitat plus 1.3 acres of weeding. Therefore, this project is **potentially consistent** with the findings in this Section.

Section 30607.1 of the Coastal Act requires that, where fill is permitted in wetlands, mitigation measures must be carried out. This Section lists a variety of methods that are appropriate to use in mitigation including acquisition of wetlands from private property owners, creation or restoration of wetlands and payment of in lieu fees.

As discussed in detail in the Wetland Mitigation Plan for this project, the loss of wetlands within the runway and taxiway safety areas will be fully mitigated. A total of 22.94 acres of degraded salt flats and wetland vegetation will be lost in the safety areas. In the restoration area, 28.49 acres of recreated and enhanced wetland habitat will be established, plus 1.3 acres of existing wetland habitat will be weeded. Therefore, this project is **potentially consistent** with this Section.

FEDERAL AVIATION ADMINISTRATION APPROVED WILDLIFE HAZARD MANAGEMENT PLAN

The purpose of the Wildlife Hazard Management Plan is to reduce the hazards to Airport operations which result from the presence of wildlife on Airport property. Concerns are focused on two primary areas: mammals and birds on the runways that might cause aircraft damage or accidents if they are hit while aircraft are taking off or landing; and airborne birds, particularly waterfowl and raptors, that may cause aircraft accidents if they are hit by aircraft or inhaled into aircraft engines or propellers.

The new wetlands that will be created at the mitigation site are not the type of wetlands that will attract waterfowl or raptors in any greater numbers than are now attracted (Woodward-Clyde Consultants, Wetland Mitigation Plan, 1996). No new open water areas that are particularly attractive to waterfowl will be created. In addition, the type of wetlands created will not attract small mammals that are the usual prey of local raptors to any greater degree than does the existing habitat. On that basis, it appears that the project is **potentially consistent** with the Wildlife Hazard Management Plan.

GOLETA SLOUGH ECOSYSTEM MANAGEMENT PLAN (DRAFT)

The Goleta Slough Ecosystem Management Plan (GSEMP) is a draft document that has been prepared by the Goleta Slough Management Committee. The Committee was initiated by the Airport to promote a dialogue between the various interests related to Goleta Slough in an effort to provide a comprehensive plan for the protection of the Slough while recognizing that development will continue to occur around the Slough. The Committee membership is composed of public (City, County, UCSB) and private property owners, utilities, regulatory agencies, environmental groups and business interests. The Plan also includes recommendations for future habitats in the Slough. The GSEMP is a comprehensive plan that has incorporated the plans and policies of the several agencies involved in Slough management so that the actions taken in and around the Slough will be in the best interests of the overall Slough. The Draft GSEMP is an appendix to the Aviation Facilities Plan and will be analyzed as part of the EIR/EIS for that plan. Mitigations for both the Aviation Facilities Plan projects and this project are based on Draft GSEMP recommendations. There is a short discussion of the GSEMP policies included here even though the Plan has not yet been adopted because of community interest in reviewing projects in the Slough using a comprehensive approach.

Policy P-1 calls for avoidance of wetland resources whenever possible. In this particular case it is not possible because wetlands have been established in required safety areas for the Airport. Because this loss will be mitigated, however, the project is **potentially consistent** with this policy.

Policy P-3 calls for protection and maintenance of wetlands and other habitats that contribute to the Goleta Slough Ecosystem. This project will result in the replacement of degraded and fragmented habitat with habitat that has better functions and values and that is better tied to Slough functions. Therefore, the project is **potentially consistent** with this policy.

Policy P-4 requires that sedimentation from the watershed be controlled to the extent feasible. Erosion and sedimentation measures have been incorporated into the project. Therefore, the project is **potentially compatible** with this policy.

Policy P-7 requires that water quality be maintained and, if possible, enhanced in the Slough. Measures have been included to reduce impacts on water quality as a result of project construction. Therefore, the project is **potentially consistent** with this policy.

Policy R-1 states that priorities for Slough restoration and enhancement should be based upon the Slough's historic functions and values and providing the greatest benefit to the Ecosystem. This project is designed to replace degraded, fragmented habitat with habitat that has historic relationships to the Slough functions. Therefore, the project is **potentially consistent** with this policy.

Policy R-5 states that the preferred mitigation for permitted habitat loss is that which is most ecologically beneficial and cost effective for the Goleta Slough Ecosystem as a whole. The project is expected to be ecologically beneficial to the Ecosystem as a whole because it reduces fragmentation and re-establishes a transitional marsh habitat that previously existed in the Slough. Therefore, the project is **potentially consistent** with this policy.

MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

A Mitigation Monitoring and Reporting Program has been prepared for the subject project in compliance with Public Resources Code §21081.6. The MMRP is attached herewith as Exhibit 9.

ENVIRONMENTAL CHECKLIST

The following checklist contains questions concerning potential changes to the environment that may result if this project is implemented. If no impact would occur, **NO** should be checked. If the project might result in an impact, check **YES** indicating the potential level of significance as follows:

Known Significant: Known significant environmental impacts. Further review needed to determine if there are feasible mitigation measures and/or alternatives to reduce the impact.

Potentially Significant: Unknown, potentially significant impacts which need further review to determine significance level.

Significant, avoidable: Potentially significant impacts which can be mitigated to less than significant levels.

Less Than Significant: Impacts which are not considered significant.

1. AESTHETICS.	NO	YES
Could the project:		Level of Significance
a) Affect a public scenic vista or designated scenic highway or highway/roadway eligible for designation as a scenic highway?		Less than significant
b) Have a demonstrable negative aesthetic effect in that it is inconsistent with Architectural Board of Review or Historic Landmarks Guidelines or guidelines/criteria adopted as part of the Local Coastal Program?	X	
c) Create light or glare?	X	

Discussion:

- 1.a. As noted in the Plans and Policy discussion above, Goleta Slough is considered to be an important scenic resource for the City as an open space. While there will be short term concerns during construction, no long term impacts on aesthetics are expected to be less than significant.
- 1.b. While a substantial amount of grading is involved, the basic land contours will change only minimally. Therefore, the project is consistent with Architectural Board of Review guidelines which call for grading to retain a natural appearance. The Local Coastal Program includes several policies that relate to this project. Based on the discussion under Plans and Policies above, the project is consistent with the LCP.

1.c. The project will not create light or glare because no lighting is proposed as part of this project.

2. AIR QUALITY.		NO	YES
Could the project:			Level of Significance
a)	Violate any air quality standard or contribute to an existing or projected air quality violation?		Less than significant
b)	Expose sensitive receptors to pollutants?	X	
c)	Create objectionable odors?	X	
Is the project consistent with the County of Santa Barbara Air Quality Attainment Plan? Yes			

Discussion:

2.a. The federal Clean Air Act Amendments of 1970 established National Ambient Air Quality Standards (NAAQS) for six "criteria pollutants." These include photochemical ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, particulate matter, and lead. The California Clean Air Act of 1977 created stricter California Ambient Air Quality Standards (CAAQS) for the state. Additionally, the California Air Resources Board has designated areas of the state that are in attainment or non-attainment of the CAAQS. An area is in non-attainment for a pollutant if the applicable CAAQS for that pollutant has been exceeded more than once in three years.

For environmental review purposes, the City of Santa Barbara utilizes CAAQS as these standards are more stringent. Presently, the County of Santa Barbara is in non-attainment with CAAQS for ozone (O₃) and particulate matter (PM₁₀). A significant adverse impact may occur when a project either individually or cumulatively interferes with the progress towards the attainment standard. Therefore, any contribution of O₃ and/or PM₁₀ that may result from a project is potentially significant.

The project would result in temporary emissions of pollutants from construction equipment during the regrading/recompacting of the safety areas and wetland mitigation site. The project would result in the generation of various emissions, including carbon monoxide (CO), reactive organic compounds (ROC), nitrogen oxides (NOx) and particulate matter (PM10). Activities that would generate emissions include on and off site construction vehicle travel, construction equipment operations, fugitive dust from grading and dirt handling and fugitive dust from paved and unpaved roads at the Airport and local roads. An estimate of the daily average and total emissions of these pollutants due to the project is provided in Table 4 below.

These emissions would cause short term adverse air quality impacts, particularly NOx and PM10 emissions. However, there would be no long term emissions associated with the project. Neither the regrading/recompacting and ongoing maintenance, nor the wetland restoration, once completed, would induce vehicular or air traffic operations, leading to pollutant emissions. There is no short-term air quality threshold of significance due to construction activities because it is recognized by the City of Santa Barbara that these emissions are temporary and do not represent a significant percentage of overall emissions in the local air basin.

The Santa Barbara County Air Pollution Control District (APCD) was contacted for guidance in evaluating potential air quality impacts from the project. The APCD has no short term (i.e., construction) thresholds for analyzing impacts. APCD staff did recommend, however, that certain measures to control fugitive dust (PM10) and emissions from trucks and equipment (NOx) be applied during the earthmoving phase of the work. These measures are summarized below, under Mitigation Measures.

**Table 4
 ESTIMATED EMISSIONS FROM THE PROJECT**

Activity	Average Daily Emissions (lbs/day)				Total Emissions (lbs)			
	CO	ROC	NOx	PM10	CO	ROC	NOx	PM10
<i>Onsite Construction Traffic</i>								
Safety Area and Mitigation Site	5.09	0.59	1.07	0.07	509	59	107	7
<i>Offsite Construction Traffic</i>								
Safety Area and Mitigation Site	7.47	1.05	1.38	0.13	747	105	138	13.2
<i>Construction Equipment Operations</i>								
Safety Area Grading	20.4	4.38	52.23	4.02	2040	438	5223	402
Mitigation Site Grading	22.01	4.43	52.29	4.03	2201	443	5229	403
<i>Fugitive Dust from Grading and Hauling</i>								
Safety Area Grading				333				178,061
Mitigation Site Grading				194				63,253
Total without PM controls=								
	54.97	10.45	106.97	535.25	5497	1,045	10,697	242,139
Total with PM controls (50%)=								
								121,070
Emissions were estimated using emission factors (mostly default values) from the South Coast Air Quality Management District's CEQA Air Quality Manual (1993). Worksheets for all emissions are presented in Appendix C of the Supporting Environmental Information for the Safety Area Grading Project, July 1996. Key assumptions are shown on worksheets. These are screening-level estimates.								

Recommended Mitigation Measure(s):

AQ-1 During Clearing, Grading, Earth Moving or Excavation, the Contractor should:

- a. Use water trucks or sprinkler systems to minimize dust leaving the site after each work day.
- b. Disturbed areas shall be treated by watering, or revegetating or spreading soil binders until the area is paved or otherwise developed.
- c. Use water trucks or sprinkler systems to keep all areas of vehicle movement damp. At a minimum, this includes wetting the areas in the late morning and after the day's work. Increased watering frequency is recommended whenever the wind speed exceeds 15 mph.
- d. A dust control monitor (who may be the Project Environmental Coordinator) should be designated to ensure that watering occurs, as necessary, to prevent the transport of dust off site.

AQ-2 Importation, Exportation and Stockpiling of Fill Material:

- a. Soil stockpiled for more than two days should be covered, kept moist or treated with soil binders.
- b. Trucks transporting fill material to and from the site should be covered with a tarp from the point of origin.

- c. Because the construction site is larger than five acres, gravel pads should be installed at all access points to prevent tracking of mud onto public roads.

AQ-3 Construction Equipment:

- a. The engine size of equipment should be the minimum practical size.
- b. Minimize the amount of equipment operating simultaneously.
- c. Maintain equipment per the manufacturer's specifications.
- d. Equipment should have two to four degree engine timing retard or precombustion chamber engines, if feasible.
- e. Catalytic converters should be installed on gasoline-powered equipment, if feasible.
- f. Diesel catalytic converters should be installed, if available.
- g. Diesel powered equipment, such as booster pumps or generators, should be replaced by electric equipment whenever feasible.
- h. Worker trips should be minimized by requiring carpooling.

Residual Impact:

The implementation of the above mitigation measures will further reduce less than significant air quality impacts.

3. BIOLOGICAL RESOURCES.	NO	YES
Could the project result in impacts to:		Level of Significance
a) Endangered, threatened or rare species or their habitats (including but not limited to plants, fish, insects, animals and birds)?		Less than significant
b) Locally designated historic, Landmark or specimen trees?	X	
c) Natural communities (e.g. oak woodland, coastal habitat, etc.).		Less than significant
d) Wetland habitat (e.g. marsh, riparian and vernal pool)?		Significant, avoidable
e) Wildlife dispersal or migration corridors?		

Discussion:

3.a **Plants**

The U.S. Fish and Wildlife Service, National Marine Fisheries Service and California Department of Fish and Game were contacted regarding biological resources and species listed or proposed for listing at the Fed-

eral or State level in the project area. The U.S. Fish and Wildlife Service (USFWS) responded with a list of such species that may occur in the vicinity of the project. This correspondence is included in Exhibit 10.

No plant species listed as endangered, threatened or a candidate for such listing by Federal and State agencies occurs in or near the safety areas or the mitigation site. The following endangered species identified by the USFWS are not expected to be located in or near the project area: Saltmarsh bird's beak (*Cordylanthus maritimus* ssp. *maritimus*), Gambel's watercress (*Rorippa gambellii*). The Gaviota tarplant (*Hemizonia increscens* ssp. *villosa*) is a candidate species and is also not expected to occur in the project area.

Additionally, no plant species endemic to Santa Barbara County occur in or near the safety areas or the mitigation site. Table 5 identifies some of the plant species listed as regionally rare (RR), locally rare (LR) or on the California Native Plant Society's (CNPS) *Inventory of Rare and Endangered Vascular Plants of California* that may be found in the general area of Goleta Slough and the Airport. The table also identifies whether the species may be found specifically in the safety areas, mitigation site or other areas of Goleta Slough.

Table 5 PLANT SPECIES OF SPECIAL STATUS		
NAME	LISTING/STATUS ¹	LOCATION
Coulter's goldfields (<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>)	CNPS	Slough
Low Barley (<i>Hordeum depressum</i>)	RR	Maybe Safety Areas
Southern Tarplant (<i>Hemizonia parryi</i> ssp. <i>australis</i>)	CNPS	Maybe Slough
Calif. Sea Lavender (<i>Limonium californicum</i>)	RR	Slough
Horned seablite (<i>Suaeda calceoliformis</i>)	RR	Safety Areas
Salt Cedar (<i>Monanthochloe littoralis</i>)	RR	Slough
Saltwort (<i>Batis maritima</i>)	RR	Slough
Meadow Barley (<i>Hordeum brachyantherum</i>)	LR	Safety Areas/ Slough/Mitigation Site
Matscale (<i>Atriplex watsonii</i>)	RR	Maybe Slough
Three-square (<i>Scirpus americanus</i>)	RR	Maybe Slough
Estuary seablite (<i>Suaeda esteroa</i>)	RR	Maybe Slough
Arrow grass (<i>Triglochin concinna</i> var. <i>concinna</i>)	RR	Maybe Slough
¹ CNPS = California Native Plant Society Species of Concern; RR = Regionally Rare; LR = Locally Rare.		

Since no plant species listed as rare, threatened or endangered or as a candidate for such listing by State and Federal agencies, are located in the safety areas or the mitigation site, the project would not impact such species. Low Barley, Horned sea-blight and Meadow Barley may be located in the safety areas; these species are regionally rare or locally rare. This impact is expected to be less than significant because these species occur in low numbers in the safety areas and because they also occur elsewhere in Goleta Slough. These species are proposed to be used in the revegetation efforts at the mitigation site and are also expected to colonize the site by way of transportation of seeds and vegetative material from the safety areas to the site. Meadow

Barley may also currently be located in scattered locations at the mitigation site. This species would be removed during grading of the mitigation site. However, this impact is not considered significant since: (1) the species occurs at other locations at the Airport in greater numbers; and (2) seeds from this species would be collected and used in the revegetation of the mitigation site.

Fish and Wildlife

As with plant species, the USFWS, National Marine Fisheries Service and the California Department of Fish and Game were requested to provide information on species listed or proposed for listing as endangered, threatened or candidate species at the Federal and State level. Correspondence from the USFWS is included as Exhibit 10. No responses were received from the other two agencies.

The following Federally endangered species were identified by the USFWS as possibly occurring in the vicinity of the project: California least tern (*Sterna antillarum browni*), American peregrine falcon (*Falco peregrinus anatum*), brown pelican (*Pelecanus occidentalis*), light-footed clapper rail (*Rallus longirostris levipes*) and tidewater goby (*Eucyclogobius newberryi*). The following were identified as threatened: Western snowy plover (*Charadrius alexandrinus nivosus*), vernal pool fairy shrimp (*Branchinecta lynchi*) and California red-legged frog (*Rana aurora draytonii*). Lastly, the California tiger salamander (*Ambystoma californiense*) was identified as a candidate species.

A bird survey conducted in April 1996 (Storrer, 1996) found the following species foraging in portions of the safety areas, particularly on the periphery: great blue heron (*Ardea herodias*), killdeer (*Charadrius vociferus*), horned lark (*Eremophila alpestris actia*), cliff swallow (*Hirundo pyrrhonota*), rough-winged swallow (*Stelgidopteryx sorripennis*), European starling (*Sturnus vulgaris*), American crow (*Corvus brachyrhynchos*), Belding's Savannah sparrow (*Passerculus sandwichensis beldingi*), western meadowlark (*Sturnella neglecta*) and Brewer's blackbird (*Duphagus cyanocephalus*). Of these species, two have special status. The Belding's Savannah sparrow is listed as Endangered by the State of California (CDFG 1994) and is a Federal species of concern (USFWS 1996). The horned lark is recognized as a State Species of Special Concern (CDFG 1994). Behavioral displays suggest that two pairs of killdeer were nesting in a location adjacent to the safety areas. Nesting by horned lark and western meadowlark on the periphery of the safety area is possible, but was not confirmed by the survey. No Savannah sparrows nests were found nor was there any indication that breeding occurs within the safety areas or peripheral areas.

Uplands and transitional wetlands comprising the mitigation site provide breeding and foraging habitat for birds. The following species were observed nesting within or adjacent to the mitigation site in the salt marsh during the April 1996 surveys: yellowthroat (*Geothlypis trichas*), song sparrow (*Melospiza melodia*), mallard (*Ana platyrhynchos*), killdeer, mourning dove (*Zenaida macroura*), Anna's hummingbird (*Claypte anna*), Bewick's wren (*Thryomanes bewickii*), western meadowlark, house finch (*Carpodacus mexicanus*) and lesser goldfinch (*Carpodacus psaltria*). Belding's savannah sparrows were observed engaging in territorial and nesting behavior at some locations of the mitigation site. The following species were found foraging in these areas: red tailed hawk (*Buteo jamaicensis*), European starling, American crow, white crowned sparrow (*Zonotrichia leucophrys*) and Belding's Savannah sparrow.

Table 6 below lists fish and wildlife species of special status that are known to exist either in the safety areas or the mitigation site.

Table 6 FISH AND WILDLIFE SPECIES OF SPECIAL STATUS		
NAME	LISTING/STATUS	LOCATION
Belding's savannah sparrow (<i>Passerculus sandwichensis beldingi</i>)	State Endangered; Federal Species of Concern	Portions of mitigation site and safety areas
Horned lark (<i>Eremophila alpestris actia</i>)	State Species of Concern	Safety areas

Additionally, the following threatened or endangered fish or wildlife species listed by the CDFG (1996) or USFWS (1996) may occur in Goleta Slough, although they do not reside in or use the safety areas or mitigation site: brown pelican, peregrine falcon, light-footed clapper rail, California black rail (*Laterallus jamaicensis coturniculus*), California least tern, snowy plover, white-tailed kite and steelhead (*Salmo gairdneri*). The following species listed by the USFWS are not expected in the area: California red-legged frog and California tiger salamander.

No fish or aquatic species are present in the safety areas or at the mitigation site due to the general absence of standing water. Open water is present in some of the drainages at the mitigation site. However, these small drainages provide limited habitat for such species due to their narrow widths, shallow and warm water and muddy substrates. Therefore, the vernal pool fairy shrimp listed as threatened by the USFWS is not expected in these areas. The tidewater goby occurs in estuaries of central and southern California. However, it has not been documented in Goleta Slough, despite an intensive survey by Lafferty and Sandoval (1992). They indicated that tidewater gobies are found in sandy pools or lagoons at the mouths of coastal streams and not in large tidal systems such as Goleta Slough. The steelhead may be found in the creeks of Goleta Slough. There have been recent findings of individuals. The creeks will not be directly affected by the project. However, steelhead could be affected by sedimentation or erosion that occurs as a result of construction. The project description includes provisions for the preparation and implementation of a Storm Water Pollution Prevention Program (SWPPP). The SWPPP is discussed in more detail in Water Environment below. With the implementation of such a program, no significant impacts on steelhead are expected.

The relative lack of cover (due primarily to routine mowing) in the safety areas provides minimal nesting opportunities for birds. Forage values in the safety areas would likely not be reduced by grading, since the sites would be replanted with grasses. Subsequent maintenance activities that disturbed the vegetation of the safety area would also involve reseeding.

The project would temporarily reduce the amount of grassland habitat for bird species until the grass cover in the safety areas was re-established (estimated to be 1-3 years). This impact is not considered significant, given the low overall quality of the habitat for birds and the availability of grassland habitat elsewhere on Airport property near Goleta Slough. The quality of wildlife habitat in the safety areas is expected to be the same or slightly greater, with the project, since there will be more vegetative cover and foraging opportunities after removal of the wetlands and barren salt flats. Although the upland grasses in the safety areas provide greater wildlife habitat than that of the wetlands, the wetland restoration element of the project nonetheless would compensate for the loss of wetlands in the safety areas. The creation of transitional wetlands at the mitigation site and the removal of non-native vegetation would enhance bird use near the Slough. In conclusion, there would not be a significant loss of avian habitat values as a result of the project.

Conversion of the mitigation site from mostly ruderal upland vegetation to middle and high marsh wetlands would have a neutral to beneficial impact on wildlife use, since weedy plant species that provide little or no wildlife forage, such as mustard, would be removed. However, the amount of vegetative cover and the vertical height of the vegetation at the mitigation site would be reduced because the new wetland vegetation would be shorter in stature and would have more open space due to the salt flats. Reduction of the amount of high

vertical stems and plant cover currently used by Belding's Savannah sparrow, however, would not be significant because: (1) this species would use any available vegetation for such displays; and (2) the berms with the upland vegetation would only partially be removed, so that this type of bird use could continue to some extent at the mitigation site. Nesting by Belding's savannah sparrow in the upland areas was not confirmed; it is likely that nesting occurs predominantly or possibly entirely in pickleweed (*Salicornia virginica*) marsh. Since the extent of this habitat would be increased at the mitigation site, nesting potential is not expected to be reduced by the habitat conversion.

No direct impact to fish and aquatic organisms and their habitat is expected to occur during the grading at the mitigation site, since the areas to be graded would be above the high tide mark. The grading of the mitigation site could result in erosion and sedimentation due to stormwater runoff in the winter following the grading and revegetation. There may be a short-term increase in total dissolved solids (TDS) and total suspended solids (TSS) in the channels of Goleta Slough as a result of erosion from the graded areas. Nonetheless, these impacts are not expected to be significant due to the various erosion control measures to be instituted at the mitigation site after grading. Please refer to the Water Environment discussion below for additional information regarding erosion and sedimentation.

Based on the analyses by Woodward-Clyde Consultants (WCC, 1996) and Storrer (1996), significant impacts to fish and wildlife species, including Federal and State listed endangered, threatened or candidate species, are not expected to occur from the project.

- 3.b There are no locally designated historic, specimen or Landmark trees in the area.
- 3.c/d A detailed inventory and analysis of the existing habitats, wildlife and plant communities of the safety areas and the proposed wetland restoration site was conducted by Woodward-Clyde Consultants (WCC, 1996a). Storrer Environmental Services (Storrer, 1996) conducted an avian survey and analysis of both the safety areas and restoration site. The following descriptions and analyses are based on both sources.

BIOTIC COMMUNITIES

The Airport was constructed by placing fill material in and near Goleta Slough beginning in the 1940s. Prior to filling for the Airport, the Slough consisted of extensive tidal saltmarsh areas, large tidal channels and deltas or alluvial fans at the mouths of major creeks. Most of the runways and taxiways were constructed by filling tidal saltmarsh and alluvial fan areas.

The depth of fill material at the Airport ranges from one to three feet. The topography in the area of the runways, taxiways and safety areas is relatively flat. Drainage is provided primarily through a system of catch basins and storm drain pipes located between the runways and taxiways (please refer to the discussion of the Water Environment below).

The vegetation types within the safety areas were classified and mapped by WCC based on field surveys in April, May and December 1995 and in January 1996. The nature and distribution of the major vegetation types in the safety areas are described in detail in the Inventory of Wetlands and Other Native Habitats, prepared by WCC in 1996.

There are two major vegetation categories in the safety areas: (1) hydrophytic and/or halophytic vegetation (i.e., vegetation commonly found in wetland communities); and (2) upland vegetation. The former category is dominated by annual and perennial plants that are adapted to both seasonal soil saturation and high soil salinities. At some locations, these plants are present primarily due to their adaptation to high soil salinities, while at other locations they are present due to their tolerance for high soil moisture. Sites where plants are responding primarily to saturated soils are considered hydrophytic plants. Approximately 22.94 acres in the safety areas are classified as hydrophytic/halophytic vegetation. This total includes barren salt flats adjacent

to the wetland vegetation. The remaining 104.02 acres are considered upland vegetation. Combined, these two equal approximately 127 acres. Vegetation types most represented include: grassland, ruderal vegetation, saltmarsh sandspurry, pickleweed and saltgrass.

Elevations at the restoration site range mostly from approximately 5 to 8 feet mean sea level. The 5-foot contour represents the limit of the high tide in the Slough. Therefore, the restoration site is mostly located above tidal influence. Some exceptions are the areas with berms to be removed, which are within existing tidal basins. Additionally, portions of the southern edges of the restoration site may have tidal influence during the relatively infrequent extreme high tides.

The restoration site is mostly level or slightly sloped to the Slough. The site often has abrupt and steep transitions from the fill material to the adjacent natural saltmarsh areas. The site receives water primarily from direct percolation and a minor amount from runoff from taxiways or runways. The restoration site contains a mixture of upland and wetland vegetation types, although the site is dominated by introduced annual grasses and weeds. Vegetation types most represented include: mustard, wild oats and coyote brush.

The project is not expected to result in significant adverse impacts to biotic communities. The wetland mitigation plan would compensate for the loss of wetlands in the safety areas as a result of the grading. After grading, the safety areas would be reseeded with upland grasses that would continue to be mowed. Subsequent maintenance activities would also be required to include the reseeded of disturbed areas.

WETLANDS

The safety areas encompass 127 acres of unpaved lands, consisting of two major types of vegetation: (1) hydrophytic and/or halophytic vegetation (i.e., vegetation commonly found in wetland communities); and (2) upland vegetation.

The vegetation types within the safety areas were classified and mapped by Woodward-Clyde consultants (WCC) based on field surveys in April, May and December 1995 and in January 1996. The results of this analysis by WCC indicate that most of the apparent wetlands in the safety areas represent sites with high soil salinity, where it appears that hydric soils from the vicinity were deposited as fill during the construction of the runways and taxiways. Currently functioning hydric soils are mostly absent from the safety areas. Wetland hydrology is also mostly absent from the safety areas, which contain a storm drain system and which have been graded to facilitate drainage and prevent ponding. Based on this evidence, WCC concluded that most of the wetlands in the safety areas developed in response to high soil salinities rather than in response to saturated soil conditions. Therefore, the dominant plants at wetland sites are functioning as halophytic plants, rather than hydrophytic plants.

The number of acres of wetlands in the safety areas varies, depending on the definition and interpretation of wetlands used by the regulatory agencies. The Army Corps requires the presence of hydrophytic plants, wetland hydrology and hydric soils. Other definitions and interpretations, including those of the California Coastal Commission (CCC) and the California Department of Fish and Game (CDFG), require the presence of only one of three criteria: wetland hydrology, hydrophytic plants or hydric soils.

A total of 123 acres in the safety areas would be graded, compacted and hydroseeded with upland grasses as part of the project. (The remaining four acres at the eastern end of Runway 7-25 would be included in the future maintenance activities of the safety area, but are not proposed to be graded at this time). The acreage of wetlands under the jurisdiction of the permitting agencies ranges from 1.69 to 22.94 acres, as shown in Table 7.

Habitat	Area (in acres)
Uplands Total	104.02
Wetlands Total	22.94
Army Corps	1.69
Other	22.94
<i>Total Area</i>	<i>126.96</i>

The grading and compacting work would result in permanent and significant impacts to 1.69 acres of wetlands (including wetland vegetation and barren salt flats) under the jurisdiction of the Army Corps. In a letter dated July 9, 1996, the Corps concurred with the wetland determination using the Army Corps' criteria as presented in the WCC Inventory, with a few minor revisions.

A total of 22.94 acres of wetland vegetation (whether hydrophytic or halophytic) and unvegetated salt flats determined to be under the jurisdiction of the CCC and CDFG would be permanently and significantly impacted. The location and acreage of these wetlands are based on determinations provided in letters by the California Department of Fish and Game (CDFG) and the California Coastal Commission (CCC).

Most of the wetland vegetation (and unvegetated salt flats) in the safety areas is expected to be permanently removed because the saline soils would be taken off site, as described in Project Description, above. The safety areas are expected to have a more uniform and dense annual grassland within a few years after the grading and compacting. Salt flats and wetland patches should be very small and scattered, if present at all. Routine mowing, occasional maintenance grading and other allowable maintenance activities are not expected to cause any long-term modification in the annual grassland species composition or density.

In addition to the permanent loss of wetlands in the safety areas, wetland vegetation and barren salt flats adjacent to the safety areas would be temporarily disturbed by the movement of construction vehicles during the grading and compacting operations. Temporary disturbance would be restricted to a 10-foot wide zone along the perimeter of the safety areas. The boundaries of this 10-foot wide zone would be flagged during construction. A total of 0.10 acre of Army Corps jurisdictional wetlands and 0.54 acre of wetlands per other agency definitions would be temporarily disturbed. These wetlands are expected to re-establish naturally after construction. As part of the project, post-construction weeding would be conducted, if necessary, to ensure adequate recovery to pre-construction conditions. Any wetlands that do not return by a few years after construction will need to be replanted.

COMPENSATION FOR THE LOSS OF WETLANDS

To compensate for the loss of wetland vegetation and barren salt flats and their associated functions and values the Airport is proposing to implement a wetland mitigation plan. Woodward-Clyde Consultants, in conjunction with Jones & Stokes Associates, developed the Wetland Mitigation Plan, consisting of a detailed written report and preliminary grading and planting plans. The main elements of the wetland restoration are included in the Project Description above.

The restoration site totals 29.86 acres along the fringes of Goleta Slough, just south of the runways and taxiways. The 29.86 acres does not include additional weeding area of 1.3 acres at the southern edge of the Slough. There are five types of treatments to be applied at the restoration site in the 29.86 acres. The treat-

ments and their associated acreages are listed in Table 8. Specific species to be used in the revegetation are listed in the Wetland Mitigation Plan.

TREATMENT	DESCRIPTION	ACREAGE OF TREATMENT
1	No grading; weeding; possible selective planting or seeding	1.73
2	Grading; create depressions; place saline soils; revegetate	19.65
3	No major grading, except localized Treatment No. 2 with shallow depressions	1.74
4	No grading, weeding or planting; retain vegetation intact	3.29
5	Grade; create depressions; revegetate; no saline soils	3.44
Total =		29.86

The habitat to be created would be similar to that impacted, but with greater habitat values and functions than the affected areas. It would be considered a related-kind habitat.

The wetlands in the safety areas have minimal function and value, compared to the wetlands proposed as part of the mitigation plan. The Wetlands Mitigation Plan provides a detailed description of the wetland functions and values at both sites. In particular, the wildlife use of the safety area is low due to the uniform nature of the vegetation, constant aircraft noise and routine mowing. Wildlife use in the safety area is dependent mostly on annual upland grasses, rather than on the wetlands. The safety area contains wetland vegetation and barren areas that may resemble the original haline vernal wetlands and alluvial salt flats prior to the development of the Airport, although the current wetlands are a result of airfield construction and fill activities. Nevertheless, the safety area wetland vegetation and barren salt flats may have a heritage value. Heritage value in the context of Goleta Slough means that the particular wetland type had a historical presence in the Slough. An important goal of the Goleta Slough Ecosystem Management Plan is to return the Slough to its historic functions and values to the extent possible (recognizing that development has occurred in a substantial portion of the Slough).

Most of the restoration site would be converted to transitional wetlands with a variety of new functions and values, primarily related to botanical and wildlife habitat values. Creating and restoring transitional middle and high marsh habitats along the northern margin of Goleta Slough would result in the following benefits: (1) provide a heritage value by restoring habitats similar to historic habitats, including that of certain rare plants that are either no longer present or not well represented in the marsh ecosystem; (2) improve the ecological diversity and value of the marsh ecosystem by partially restoring the vegetation and topography to a more natural historic configuration; and (3) improve wildlife habitat values at the site by providing more native vegetative structure, plant diversity and edge complexity than do the impacted habitats in the infield. Additionally, a portion of the site would be restored to low marsh or mudflat, primarily through the removal of berms. Removal of the weed species at the restoration site would also enhance the habitat values, as a source of weed seeds would be taken away.

Upon implementation of the project, the 22.94 acres of hydrophytic and/or halophytic vegetation in the safety areas would be replaced with upland vegetation. Upland grass species would be planted. Combined with the existing 104.22 acres of uplands, this would result in a total of almost 127 acres of upland vegetation in the safety areas.

Upon implementation of the mitigation plan, the following would occur at the 29.86-acre site: (1) the existing 25.79 acres of uplands would decrease to 1.37 acres, (2) the remaining 24.42 acres of uplands would be converted to wetlands (including possibly low marsh and mudflats), (3) 0.96 acres of existing wetland would be enhanced and (4) the remaining 3.11 acres of existing wetlands would remain as such. Additionally, portions of existing wetlands and uplands at the site would be enhanced by weeding. Weeding may include the use of herbicides in certain instances. The Wetland Mitigation Plan indicates that use of herbicides would be subject to approval by the Airport. Use of herbicides should also be subject to approval by the restoration specialist/biologist.

In summary, aside from selective enhancement, there would be a net increase of 24.42 acres of wetlands at the restoration site. Therefore, the mitigation plan would provide over a 1:1 replacement to impact ratio for the removal of 22.94 acres of wetland vegetation and barren salt flats, resulting in a net increase of 1.48 acres of wetlands on Airport property.

These figures do not include the additional areas to be weeded in Goleta Slough, as discussed earlier in this subsection. These areas will be finalized at a later date. Therefore, the total area to be improved would be greater.

Vegetation Type	Existing Acreage	Future Acreage
Army Corps Wetlands*	4.07	3.11 **
New Wetlands	0	25.38 (net increase of 24.42)
Uplands	25.79	1.37
Total =	29.86	29.86
* Only Army Corps wetlands occur at the restoration site. ** 0.96 acre of existing wetland would be enhanced by the planting of additional wetland species and so is included in "new wetlands" acreage.		

Where feasible, access to various portions of the restoration site is proposed to be from upland or fill areas. Access via wetland areas may be necessary in some cases, such as for the placement of temporary bridges to cross drainage channels during construction. The work at the restoration site would temporarily disturb marsh, mudflats and the banks of drainage channels during the grading of the site due to incidental disturbance of adjacent areas along the perimeter of the graded area. It is estimated that the 3-foot wide zone outside the boundaries of the graded area would be temporarily affected. About 0.83 acre of Army Corps wetlands and an additional 0.17 acre of mudflat habitat (considered "waters of the United States") would be temporarily disturbed at the restoration site during construction. (Note that non-Army Corps wetlands do not occur adjacent to the restoration site). Such disturbance should be minimized to the extent possible. In addition, the map showing equipment storage and materials stockpiles is somewhat general. Some of the sites are located near delineated wetlands. However, a mitigation measure has been included that requires that such

equipment and stockpile areas be placed outside of such areas and designed to minimize spill over into those areas.

Ribbon fencing along the perimeter of all areas to be graded at the site is being included as part of the project to minimize incidental disturbance to adjacent habitats. Wetlands that are temporarily disturbed during the restoration site grading would be allowed to revegetate naturally during the first year. Post-grading weeding is included as part of the project in these areas, as well as in the mudflats and on the banks of the drainage channels, on an as-needed basis to encourage wetland plant recovery in wetland areas and to exclude weed infestation in the mudflats and drainages. If the wetland vegetation does not return in temporarily disturbed salt marsh areas in the year following grading, the areas would be revegetated with wetland plants.

A seven year maintenance and monitoring program is included in the Project Description, along with Contingency Plans for failure to meet restoration objectives and performance standards. At present, the Wetlands Mitigation Plan calls for only one report at the conclusion of the two year maintenance period. Annual reports are required during the five year monitoring period which follows. Staff believes that annual reporting during monitoring period is adequate. However, there is concern that there may be inadequate reporting during the maintenance period. Interim reports at six month intervals might assist in catching problems before they occur and reduce the potential for the need to use the contingency plans. A mitigation measure has been incorporated into the Project Description to this effect.

- 3.e Wildlife corridors would not be affected by this project, except to reduce berm areas which would reduce the potential for predators to move deeper into the Slough. This is seen as a benefit because the predators prey on the Belding's Savannah sparrow, a State listed endangered species, and other species of concern.

Mitigation Measure(s):

- Bio-1 Semi-annual reports on the status of the mitigation site shall be required during the maintenance period. These reports shall contain information similar to that of the annual monitoring reports and shall note the progress of restoration process, weeding and other activities.
- Bio-2 Use of herbicides on either the safety areas or the mitigation site shall be subject to approval by the restoration specialist/biologist.
- Bio-3 All stockpile and equipment storage areas shall be located outside of delineated wetlands and designed to minimize spill into such areas.

Residual Impact: The implementation of Mitigation Measures Bio 1 through 3 will result in wetland impact being reduced to a less than significant level.

4. CULTURAL RESOURCES.	NO	YES
Could the project:		Level of Significance
a) Disturb archaeological resources?		Significant, avoidable
b) Affect a historic structure or site designated or eligible for designation as a National, State or City landmark?	X	
c) Have the potential to cause a physical change which would affect ethnic cultural values or restrict religious uses in the project area?	X	

Discussion:

4.a The Airport contains a wide variety and high density of cultural resources, including pre-historic and historic Native American archaeological sites and historic structures and sites dating from the 1800s. The abundance of Native American archaeological sites is due to the high number of Native American villages and settlements around the original perimeter of Goleta Slough.

On August 18, 1993, the City's Historic Landmarks Commission (HLC) approved the *Phase I Archaeological Assessment of the Santa Barbara Municipal Airport* (Dames & Moore and Snethkamp & Associates, 1993, hereinafter referred to as the Airport Phase 1 Study). The goal of the study was to develop programmatic procedures to identify, assess and manage cultural resources that could be affected by future Airport development. The study included a prehistoric and historic archaeological background analysis and an inventory and preliminary assessment of prehistoric and historic sites and structures. Sensitivity zones were identified and mapped for the entire Airport property. Each zone contains specific management recommendations, including procedures for assessing the significance of cultural resources and evaluating potential impacts. The City uses this report as a guide in analyzing impacts of Airport projects.

A letter report, dated November 14, 1996, was prepared by Science Applications International Corporation (SAIC). The report concluded that there is a potential for significant impacts on archaeological sites. Seven prehistoric archaeological sites occur at or near the Airport. One site occurs in the area of the project. Site SAIC-93-1 is located at the eastern end of Runway 7-25, in the safety area for that runway. However, as discussed in the Project Description, this portion of the safety area is not part of the initial regrading/recompacting work. Maintenance work may occur here, as needed, at a later date. The site consists of a low density scatter of shellfish remains and faunal material which occurs in disturbed soils to a depth of 27 inches. Small quantities of road asphalt, concrete and other historic material occur throughout the profile. The site is heavily disturbed and appears to be redeposited material. There is a possibility of intact remains below 20 inches or more. This area has been classified as a low sensitivity area by the Airport Phase 1 Study.

According to the Airport Phase 1 Study, the northeastern portion of the safety areas is located in a low sensitivity zone for prehistoric and historic Native American resources. The area is designated low sensitivity because it is considered highly disturbed or is composed of recently deposited material. The north central portion of the safety areas is located in the American period and early 20th century archaeological sensitivity zone because of the houses and barns that were once located along Fairview and Hollister Avenues from roughly 1900 to 1920. No portion of the restoration site is located in a sensitivity zone.

On November 7, 1996, Science Applications International Corporation (SAIC) conducted a surface survey of the portions of the area of the project that are in the sensitivity zones identified in the previous paragraph, consistent with the recommendations of the Airport Phase 1 Study. Marine shellfish and two chert flakes were found in some areas. The report notes that the presence of the shellfish and chert flakes on the ground

surface are likely to be associated with nearby fill (i.e., redeposited) material used during construction of the Airport. Therefore, the location was not recorded as an archaeological site. The report recommends that archaeological monitoring during construction be conducted within a 50-foot sensitivity zone of any area where marine shellfish or flakes were noted on the ground surface.

No construction monitoring is required for Site SAIC-93-1 at this time, because it occurs in an area which would not be graded during the initial regrading/recompacting work. If the future regrading and maintenance activities in this area exceed 50 centimeters, monitoring would be necessary.

If significant cultural resources are identified during monitoring, the Airport would be required to halt construction in the area and implement the procedures as described in the Airport Phase 1 Study. These include subsurface testing to establish the nature, depth and boundaries of archaeological materials and, if necessary, formal sample excavations for data recovery and site recordation. Such work would need to be coordinated with the FAA and the State Historic Preservation Office, as necessary, and conducted pursuant to the National Historic Preservation Act and Archaeological and Historic Preservation Act, as well as the City of Santa Barbara's Master Environmental Assessment.

- 4.b The project is not expected to impact properties on or eligible for inclusion in the National Register of Historic Places or designated as City Structures of Merit or Landmarks because none are in the project area.
- 4.c The project does not have the potential to cause a physical change that would affect ethnic cultural values or restrict religious uses in the project area because there are no such uses in the project area.

Mitigation Measure(s):

- CR-1 All demolition and construction-related ground disturbing activities exceeding a depth of 50 centimeters that occur in the future in the area of Site SAIC-93-1 be monitored by a professional archaeologist with demonstrated expertise in the recognition and evaluation of historic period artifacts and cultural features to ensure the protection of any cultural resources encountered. The archaeologist shall be empowered to halt or redirect construction activity if any potentially significant cultural deposits and/or features are encountered until such discoveries may be properly evaluated according to cultural resource significance criteria. A Phase 2 subsurface testing program and Phase 3 salvage excavations could be necessary if previously undiscovered cultural materials are encountered during construction.
- CR-2 Archaeological monitoring shall occur during any construction within a 50 foot sensitivity zone of any area where marine shellfish or flakes were noted on the ground surface. These areas have been shown in the report prepared by SAIC for this project.
- CR-3 Construction personnel involved in ground disturbing activities (i.e., grading, utility trenching, etc.) shall be alerted to the remote possibility of encountering subsurface cultural resources. If such resources are encountered or suspected, work shall be halted in that area, and the City Environmental Analyst and a professional archaeologist consulted to make a determination of cultural resource significance and appropriate mitigation measures if necessary.

Residual Impact:

With the implementation of the mitigation measures outlined above, impacts to archaeological resources will be reduced to a less than significant level.

5. GEOPHYSICAL.		NO	YES
Could the project result in or expose people to:			Level of Significance
a)	Seismicity: fault rupture?	X	
b)	Seismicity: ground shaking or liquefaction?	X	
c)	Seismicity: seiche or tsunami?	X	
d)	Landslides or mud slides?	X	
e)	Subsidence of the land?	X	
f)	Expansive soils?	X	
g)	Excessive grading or permanent changes in the topography?		

Discussion:

- 5.a-c The closest faults are the More Ranch Fault and the North Ellwood Fault. The routes of these faults through this area are along the southern edge of Goleta Slough and the northern part of UCSB's main campus. Both faults are considered to be Potentially Active. The regrading of the existing safety area and restoration of wetland will not result in impacts related to seismic activity.
- 5.d There is no potential for landslides or mud slides which would affect the project area. In addition, the project would not lead to such events.
- 5.e.f The grading will not result in land subsidence nor are the soils considered to be particularly expansive.
- 5.g A substantial amount of grading is proposed as part of this project. Approximately 126.5 acres of the safety area and immediately adjacent area will be graded. In addition, up to 26.75 acres at the restoration site will be graded for a total of 153.25 acres. Between 47,000 and 51,000 cubic yards of soil will be cleared and grubbed. While some of the soil graded from the safety areas will be used in the restoration site, approximately 6,400 cubic yards will be removed from the site. However, the overall grade will be substantially unchanged when the project is finished except to create a more natural transition from the Airport operations area to the adjacent wetlands. This will result in no significant geophysical impacts.

6. HAZARDS. Could the project involve:	NO	YES
		Level of Significance
a) A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals or radiation)?		Less than significant
b) The creation of any health hazard or potential health hazards?	X	
c) Exposure of people to existing sources of potential health hazards?		Less than significant
d) Increased fire hazard in areas with flammable brush, grass, or trees?	X	

Discussion:

- 6.a See discussion under Water Environment (#12.c and d below).
- 6.b This project will not create any new health hazard. In fact, this project will improve the existing safety areas and thus reduce safety hazards at the Airport.
- 6.c As noted in the Project Description, there is an existing area of about one acre at the southwest end of the old diagonal runway that is impregnated with oil. The Santa Barbara County Hazardous Materials Unit has determined that no remedial actions are necessary (Exhibit 5). The Airport proposes that the contractor and/or the Airport will remove this impregnated soil to an appropriate location as part of the project. No significant impacts are expected to occur.
- 6.d The area of vegetation will not increase nor will the potential for fire hazard.

7. NOISE. Could the project result in:	NO	YES
		Level of Significance
a) Increases in existing noise levels?	X	
b) Exposure of people to severe noise levels?	X	

Discussion:

- 7.a, b Since the project involves the regrading and recompacting of the existing runway and taxiway safety areas, with no expansion or alteration of aviation facilities and/or operations proposed, no changes in aircraft noise emissions are expected. Similarly, wetland restoration and ongoing maintenance in the safety areas would also not contribute to an increase in aircraft noise emissions.

Construction of the project, including the wetland restoration and ongoing maintenance elements, may result in temporary increases in noise from earthmoving equipment. However, since these potential increases are temporary, the general Airport area is already subject to noise from existing aircraft and no sensitive noise receptors (e.g., schools, residential areas, commercial/office uses) are located in the vicinity of the work area, no impacts are expected to occur.

8. POPULATION AND HOUSING.	NO	YES
		Level of Significance
Could the project:		
a) Induce substantial growth in an area either directly or indirectly (e.g. through projects in an undeveloped area or extension of major infrastructure)?	X	
b) Displace existing housing, especially affordable housing?	X	

Discussion:

8.a,b While there will be a need for workers during project construction, the construction is expected to last no more than six months. This will result in little to no growth impact. No housing will be displaced.

9. PUBLIC SERVICES.	NO	YES
		Level of Significance
Could the project have an effect upon, or result in a need for new or altered services in any of the following areas:		
a) Fire protection?	X	
b) Police protection?	X	
c) Schools?	X	
d) Maintenance of public facilities, including roads?	X	
e) Other governmental services?	X	
f) Electrical power or natural gas?	X	
g) Water treatment or distribution facilities?	X	
h) Sewer or septic tanks?	X	
i) Water distribution/demand?	X	
j) Solid waste disposal?	X	

Discussion:

9.a-i This project will have no impact on fire and police protection, schools, maintenance of public facilities or other government services. In addition, it will have no impact on utilities, water treatment or distribution facilities or demand or sewer treatment.

9.j The project would not result in a permanent, long-term increase in solid waste generation, as no new facilities or structures would be developed. There would be an increase in solid waste generation in the short-term during the construction of the wetland restoration project and as a result of the safety area grading work and ongoing maintenance. This waste would include primarily excess soils and vegetation (32,400 to 34,900 cy) that would be taken off site. The project includes the sharing of soils where possible between the restoration site and the safety areas, to reduce the volume of soils needed to be exported from the Airport property. It will be up to the contractor to determine what happens to the exported soil. It is likely that the contractor will either find a project where the excess soils can be used or stockpile and sell the soil as fill for other projects. Any soil that cannot be used would most likely be transported to the Tajiguas Landfill, owned and operated by the Santa Barbara County Public Works Department Solid Waste Division. In discussions with Solid Waste Division staff, it has been determined that there would be no impacts related to solid waste. The Solid Waste Division may, in fact, actually waive fees for depositing any soil in the landfill if cover is needed for the facility. Given that solid waste generation would be limited to construction activities and excess fill, no solid waste impacts from the project are expected to occur.

10. RECREATION.		NO	YES
Could the project:			Level of Significance
a)	Increase the demand for neighborhood or regional parks or other recreational facilities?	X	
b)	Affect existing parks or other public recreational facilities?	X	

Discussion:

This project will not increase the demand for park space or recreational facilities nor will it have an effect on existing parks or recreational facilities.

11. TRANSPORTATION/CIRCULATION.		NO	YES
Could the project result in:			Level of Significance
a)	Increased vehicle trips?		Less than significant
b)	Hazards to safety from design features (e.g. sharp curves, inadequate sight distance or dangerous intersections)?	X	
c)	Inadequate emergency access or access to nearby uses?	X	
d)	Insufficient parking capacity on-site or off-site?	X	
e)	Hazards or barriers for pedestrians or bicyclists?	X	

Discussion:

11.a While there will be no long term changes in traffic as a result of the project, there will be some short-term traffic generated during construction. Based on:

- a 6 month schedule,
- a 5-day work week (Monday through Friday),
- two 8 hour shifts (7 AM to 4 PM and 10 PM to 7 AM),
- an average of 10 workers per shift,
- 1.2 person vehicle occupancy,
- 100 days of grading and soil import/export
- and a total 120 day work period,

there will be a daily average of 71 average daily trips (ADTs) and no PM peak hour trips (PHT) as a result of the construction. This means that there will be no significant impacts on traffic. There would be no PHTs because the day shift ends before and the night shift begins after the PM peak hour. In order to assure that this is the case, a mitigation measure has been included to require that there be no peak hour trips. In addition, because of the congestion that occurs at the Fairview/Hollister Avenue intersection during much of the day, a mitigation measure has been incorporated to minimize trips through this intersection. In addition, the intersection of Fairview Avenue/SB U.S. 101 Ramps is an impacted intersection and should be avoided by southbound traffic.

11.b There will be no changes to the existing road system as a result of this project. Therefore, there will be no impacts related to safety.

11.c There will be no changes to emergency access or impacts on access to nearby uses as a result of this project. Therefore, there will be no access related impacts.

11.d The project includes sufficient on-site parking during construction. No parking will be required when construction is complete. Therefore, there will be no parking related impacts.

11.e No new hazards or barriers will be created for pedestrians or bicyclists. Therefore, there will be no pedestrian or bicyclist related impacts.

Mitigation Measure(s):

TC-1 The following requirements shall be incorporated into construction plans submitted to the Division of Land Use Controls with applications for building permits. All of these construction requirements must be completed prior to the issuance of a Building Permit:

- a. A pre-construction conference shall be scheduled with the General Contractor. The conference shall include representatives from the Public Works Department, Building Division, Planning Division, Property Owner, Restoration Specialist/Biologist and Contractor.
- b. The contractor shall prepare a truck route plan, subject to the review and approval of the Transportation and Parking Division Manager. The contractor shall provide personnel, signs and devices necessary to implement the plan and shall submit any changes for consideration at least seven (7) days in advance. The truck route plan shall include the following:
 - i. Truck traffic shall be directed to use Ward Memorial Boulevard rather than Fairview Avenue whenever possible.

- ii. No peak hour trips shall be allowed through the Fairview/Hollister intersection. Trips through this intersection shall be minimized at all other times.
- iii. No peak hour trips shall be allowed through the Fairview Avenue/SB U.S. 101 Ramps intersection.

Residual Impact:

With the implementation of the above mitigation measures, the short term traffic impacts will be less than significant.

12. WATER ENVIRONMENT.		NO	YES
Could the project result in:			Level of Significance
a)	Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?	X	
b)	Exposure of people or property to water related hazards such as flooding?		Potentially significant, avoidable
c)	Discharge into surface waters?		Less than significant
d)	Change in the quantity, quality, direction or rate of flow of ground waters?	X	
e)	Increased storm water drainage?	X	

Discussion:

- 12.a.e While there will be substantial regrading and contouring of the project area, the amount of area that is paved will remain unchanged. This will result in no change to absorption rates or drainage patterns. In addition, the amount of surface runoff will not be affected by the project. There will be some change in the rate of surface runoff at the restoration site due to the creation of shallow depressions. However, this change is beneficial because it will promote the development of salt flat habitat similar to that which will be removed from the safety area.
- 12.b The project area is within a 100-year floodplain. However, the project will not result in the exposure of additional people or property to flooding or other water related hazards. The Airport is in an area that was historically part of Goleta Slough. The Slough is a natural floodwater conveyance for several creeks in the area, including Tecolotito, Carneros, San Pedro and Las Vegas Creeks. The Airport is almost entirely within the 100-year Floodplain for the creeks listed above. Both the east and west ends of Runway 7/25 and much of the restoration site are in the Regulatory Floodways designated by the Federal Emergency Management Agency (FEMA). City ordinances require that new construction within the Regulatory Floodway not decrease the conveyance capacity. In order to assure that conveyance capacity is not affected by the project, the Airport hired Penfield & Smith to prepare Floodway Findings on the project. This study concluded that there is not enough information at this preliminary stage to come to a clear conclusion regarding impacts on Floodway conveyance in the safety areas. However, because the grade will be lowered in the restoration area, there will be no impacts to flood conveyance in the restoration area. The study makes recommendations to

assure that conveyance will not be impacted in the safety area. Carrying out these recommendations has been included as a mitigation measure.

- 12.c Water quality issues associated with the project relate primarily to erosion control to reduce sedimentation and to maintaining effective storm water drainage in the safety areas and wetland restoration site. These items are of particular concern, given the project's location adjacent to and within Goleta Slough.

APPLICABLE WATER QUALITY STANDARDS

The *Water Quality Control Plan for the Central Coast Basin* (Regional Water Quality Control Board, 1994) lists various beneficial uses for bodies of water and describes the water quality which must be maintained to allow those uses. The Plan notes that Federal terminology refers to water quality standards as consisting of beneficial uses and water quality objectives. A description of these standards is contained in the Plan. The standards, which are designed to satisfy all State and Federal requirements, are summarized below.

Beneficial uses that are specifically designated for Goleta Slough in the Plan include the following:

- Water contact recreation
- Non-contact water recreation
- Wildlife habitat
- Warm freshwater habitat
- Migration of aquatic organisms
- Spawning, reproduction or early development of aquatic organisms and other species
- Preservation of biological habitats of special significance
- Rare, threatened and endangered species
- Estuarine habitats
- Commercial and sport fishing
- Shellfish harvesting

Beneficial uses are also designated for Tecolotito Creek, which traverses Goleta Slough. They include those uses listed above, as well as the following additional uses:

- Municipal and domestic supply
- Groundwater recharge
- Cold freshwater habitat
- Freshwater replenishment

The Plan includes general objectives for a variety of water quality characteristics. The Plan also contains specific quantitative water quality objectives for a number of beneficial uses. However, the Plan does not include any specific water quality objectives for Goleta Slough.

Additionally, the State Water Resources Control Board, "*Statement of Policy with Respect to Maintaining High Quality of Waters in California*," is also applicable. This policy states that whenever the existing quality of water is better than the quality of water established as objectives, the existing conditions shall be maintained unless otherwise provided by the policy.

The Regional Water Quality Control Board (RWQCB) implements the Plan by issuing and enforcing waste discharge requirements. The Plan notes that water quality is controlled when such discharges are managed so that: 1) they meet these requirements; 2) water quality objectives are met; and 3) beneficial uses are protected.

WATER QUALITY PERMITTING REQUIREMENTS

The regrading/recompacting of the soils in the safety areas, the grading of the wetland restoration site and ongoing maintenance would result in the discharge of fill material into "waters of the United States," which includes wetlands. Additionally, the restoration site includes areas within the jurisdictional boundaries of Section 10 of the Rivers and Harbors Act. Discharges into "waters of the United States" are regulated by the United States Army Corps of Engineers (Army Corps) under Section 404 of the Federal Clean Water Act. The Army Corps also regulates Section 10 waters. Therefore, a permit from the Army Corps is required for these grading activities. The Army Corps issued a Provisional Permit on January 21, 1997. The permit is valid once a Section 401 water quality certification is obtained from the RWQCB, as noted below.

Section 401 of the Clean Water Act authorizes the State to certify that such discharges into "waters of the United States" will not violate State or Federal water quality standards. Section 401 certification for the project would be determined by the Central Coast Regional Water Quality Control Board (RWQCB). A formal request for certification was submitted to the RWQCB in July 1996, concurrently with the submittal to the Army Corps. However, shortly thereafter, RWQCB staff noted that certification could not occur until the project was analyzed pursuant to the California Environmental Quality Act (CEQA). Therefore, the 401 certification request was temporarily withdrawn and will be re-initiated upon completion of CEQA review. Upon preliminary review of the project by the RWQCB, staff has indicated that such work would appear to be acceptable.

Section 402 of the Clean Water Act establishes a framework for regulating municipal and industrial storm water discharges under the National Pollutant Discharge Elimination System (NPDES). Industrial facilities, such as the Airport, which discharge storm water associated with industrial activity, are required to obtain an NPDES permit. The State Water Board has issued a statewide general permit that applies to all discharges requiring a permit except construction activities (Construction activities are covered under a separate permit, as described below). As part of this statewide general permit, the Airport developed and annually updates and implements, a Storm Water Pollution Prevention Plan (SWPPP). As part of the SWPPP, the Airport conducts storm water outlet inspections and storm water sampling, ensures that Best Management Practices (BMPs) are being implemented and prepares and submits annual monitoring reports to the Regional Board. The BMPs include primarily measures related to "good housekeeping," spill prevention and response and materials storage and inventory.

Most of the drainage from the Airport property empties into San Pedro Creek, Tecolotito Creek, Carneros Creek and Goleta Slough. Drainage from the safety areas eventually outlets at San Pedro Creek, Tecolotito Creek or Goleta Slough. Some of the outlets at Goleta Slough are located within the wetland restoration site. The wetland restoration site drains into Goleta Slough. Out of a total of 23 storm water discharge points on Airport property, nine are representative sites and are sampled on a regular basis. The 1996 annual report submitted to the RWQCB indicated that only one site contained a significant amount of a pollutant during the first sampling event. The second sampling event contained no pollutants of significant quantities.

Section 402 of the Clean Water Act also establishes a framework for regulating storm water discharges associated with construction activities, pursuant to the NPDES. A statewide general permit has also been issued for construction activities. Since the project construction site area exceeds 5 acres, the Airport must obtain a General Construction Activity Storm Water Permit from the RWQCB. As part of this Permit, the Airport must prepare a Storm Water Pollution Prevention Plan (SWPPP) tailored to the specific construction activities associated with the project. The SWPPP would apply to the work in the safety areas and at the wetland restoration site.

The SWPPP must contain a description of sediment and pollutant sources (e.g., equipment and graded areas), measures to reduce sediment and pollutant storm water discharges from the construction area measures to eliminate or reduce discharge of pollutants from point sources such as equipment, measures to reduce sedimen-

tation from the site after construction (i.e., initial regrading/recompacting) procedures to remove all construction wastes from the site and procedures to inspect, maintain and repair as necessary all erosion and sediment control devices after construction. Many of these requirements can be met through implementation of BMPs.

EROSION AND SEDIMENTATION

Safety Areas

The safety areas to be graded encompass approximately 123 acres of relatively flat land with compacted soils and primarily sparse to dense annual grassland. Grading is expected to occur in the period July through December 1998 (although some work may begin as early as May 1998). The average depth of grading would be 2.88 inches; however, grading may require excavations of up to 18 inches in areas with mounding. The graded areas would be compacted to 90 percent of the total compaction possible, based on the soil texture. Following compaction, the safety areas would be hydroseeded with annual grasses, including a mulch or tackifier to prevent wind and water erosion of the seeds. Maintenance, including subsequent grading of the safety area, would entail similar procedures.

Storm water runoff from the safety areas is primarily conveyed to 24 by 24 inch drain inlets located throughout the safety areas. These inlets are connected to 26 to 36 inch diameter reinforced concrete pipes that convey storm water to various outlets at Tecolotito Creek, San Pedro Creek or Goleta Slough. The regrading of the safety areas would ensure efficient storm water drainage by smoothing surface irregularities.

During the regrading/recompacting period and maintenance activities, as well as during the winter months following the completion of the work, the safety areas would be subject to potential water erosion, particularly if there are significant rain events over short periods of time (e.g., 2 or more inches within 24 hours). Runoff from the graded areas could include suspended and dissolved solids that would be transported to Tecolotito Creek, San Pedro Creek or the Goleta Slough. The runoff is most likely to include silts and clays from the soil surface that were not retained by mulch. Therefore, there could be an increase in total suspended solids (TSS) and total dissolved solids (TDS) in the creeks and other drainages of Goleta Slough.

Substantial increases in TSS and TDS could adversely affect fish and aquatic organisms in the channels and periodically inundated wetlands of Goleta Slough. Although water quality in the Slough may be temporarily degraded, no adverse effects would occur to other resources, such as wetland vegetation, wildlife, ground water, recreation or water supply because either such resources are not affected by changes in TSS or TDS levels or because such resources are absent from areas downstream of the Airport.

Preparation of a SWPPP pursuant to the General Construction Activity Storm Water Permit would ensure that erosion from the safety areas during and after grading would be reduced to the maximum extent feasible. The erosion and sediment control measures contained in the SWPPP would be applied to the ongoing future maintenance activities in the safety areas (e.g., future grading/compacting) as appropriate. It should be noted that construction of temporary sediment basins or traps, earthen dikes or hay bales may not be feasible due to the need to keep the safety areas smooth and free from above ground structures. Other methods, such as reseeding and use of mulch, which are already included as part of the project, would be utilized. It may be possible to place modified straw bale dikes and/or silt fencing less than 3 inches in height around each drain inlet during and after construction to capture sediments before entering the drain inlet. However, the effectiveness of these measures would be low.

The magnitude of the impact from sedimentation and erosion would depend on the severity of the runoff events. Hence, no impact is expected if the winter is dry or if the winter produces a series of small storms that facilitate the germination and growth of grasses in the safety areas. The impact would be greater if it occurred during grading, prior to the application of hydroseed and mulch. However, the potential erosion and

sedimentation impact from the regrading/recompacting of the safety areas would not be significant for the following reasons:

1. Winter runoff into Goleta Slough is commonly observed to be heavily sediment laden due to upstream sources, such as agricultural fields. The contribution from the safety areas would be only a small fraction of the total sediment input from the watershed.
2. The safety areas are very flat. Hence, runoff from the safety areas has very low velocities and is unlikely to cause significant erosive forces.
3. The Airport is required to prepare a SWPPP.

Wetland Restoration Site

Approximately 24.83 acres of the restoration site would be graded during the period from July to December 1998 (or could begin as early as May 1998). The average depth of grading would be about 22 inches. The maximum depth of excavation would be 4 feet. Saline soils from the safety areas would be placed as a 4-inch topsoil on the graded areas to facilitate germination and growth of native wetland plants. Most of the restoration site would be seeded, including a mulch or tackifier to prevent wind and water erosion of the seeds. Portions of the restoration site would also be planted with cuttings and/or small container plants. Existing drainage channels at the restoration site would continue to convey storm water from the safety areas and other portions of the Airport to the Slough.

Grading activities at the restoration site would have the potential for causing erosion and sedimentation into the Slough in the same manner as described for the safety areas. However, the potential for erosion and sedimentation impacts is greater at the restoration site for the following reasons:

1. The restoration site is located directly adjacent to tidal drainages and periodically inundated marsh areas.
2. The gradient and slopes of the restoration site are greater than in the safety areas and there is less land for a "buffering or filtering" effect on runoff.
3. There are no drain inlets or points of runoff collection that would allow capture of sediments.

The SWPPP would include measures to be implemented at both the safety area and the restoration site and would ensure that significant erosion and sedimentation does not occur. The SWPPP can and should include more types of control measures and devices because there are less constraints on activities at the restoration site compared to the safety areas. The SWPPP for the restoration site would incorporate the following erosion control measures which are already included as part of the project: (1) silt fences along the perimeter of all areas graded and planted until sufficient plant cover has been achieved; (2) straw bale dikes where feasible; and (3) soil stabilizers and mulching on slopes graded above tidal channels.

In addition, the California Department of Fish and Game has expressed concern about possible siltation into Tecolorito Creek in the safety area at the west end of Runway 7/25 prior to growth of the revegetated areas. Inclusion of additional measures to minimize such siltation will result in reducing potential impacts to less than significant levels.

Through preparation and implementation of a SWPPP for the safety areas and restoration site, which would incorporate measures previously identified as part of the project, no significant impact to water quality is anticipated.

- 12.d This project will not generate any additional drainage or make any subsurface changes that could lead to changes in ground water quantity, quality, direction or rate of flow.

Mitigation Measure(s):

- WR-1 All recommendations in the *Floodway Findings for Santa Barbara Airport Runway and Taxiway Graded Safety Areas*, prepared by Penfield & Smith, dated January 22, 1997 shall be carried out prior to issuance of the construction permit.
- WR-2 The Storm Water Pollution Prevention Plan for construction activities shall include, but not be limited to:
- a. Descriptions of sediment and pollutant sources.
 - b. Applicable measures to reduce sediment and pollutant storm water discharges from the construction area, as appropriate and feasible, including, but not limited to Best Management Practices, soil stabilization methods, seeding, vegetative buffer strips, detention basins, straw bale dikes, silt fences, storm drain inlet protection, velocity dissipators, earth or sandbag dikes, check dams and sediment basins.
 - c. Measures to eliminate or reduce discharge of pollutants from point sources such as equipment and dewatering operations.
 - d. Measures to reduce sedimentation from the site after construction.
 - e. Procedures to inspect, maintain and repair all erosion and sediment control devices that remain after construction.
- WR-3 Hay bales and/or siltation fencing shall be installed at the west end of the Runway 7/25 safety area until such time as new vegetation has been established.

Residual Impact:

With the implementation of the mitigation measures outlined above, impacts on Water Resources related to flooding and discharge to surface waters will be less than significant level.

MANDATORY FINDINGS OF SIGNIFICANCE.		YES	NO
a)	Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X
b)	Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?		X
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)?		X
d)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X

INITIAL STUDY CONCLUSION

On the basis of this initial evaluation it has been determined that:

Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described in the initial study have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.

Case Planner/Initial Study Preparer: Janice M. Hubbell, Project Planner

Environmental Analyst: Debra A. Andaloro, Project Planner/Environmental Analyst

Date: April 4, 1997

Exhibits

1. Site Plan
2. Vicinity Plan
3. Runway and Taxiway Safety Areas
4. Conceptual Wetland Mitigation Plan
5. Letter from Santa Barbara County Hazardous Materials Unit, November 26, 1996
6. Access, Equipment Storage and Stockpile Locations
7. Airport Zoning in Project Area
8. Airport LCP Habitat Map
9. Mitigation Monitoring and Reporting Program
10. Correspondence from U.S. Fish and Wildlife Service regarding Sensitive Plants in the Project Area

LIST OF SOURCES USED IN PREPARATION OF THIS INITIAL STUDY

The following sources used in the preparation of this Initial Study are located at the Community Development Department, Planning Division, 630 Garden Street, Santa Barbara and are available for review upon request.

Project-Specific Studies

- Floodway Findings for Santa Barbara Airport Runway and Taxiway Graded Safety Areas, prepared by Penfield & Smith, January 22, 1997
- Inventory of Wetlands and Other Native Habitats, Santa Barbara Municipal Airport, prepared by Woodward-Clyde Consultants, April 1996
- Phase 1 Archaeological Assessment, Santa Barbara City Municipal Airport Property, Dames & Moore/Snethkamp & Associates, August 1993
- Revised Safety Area Grading Project, Project Description, Purpose, Need, Santa Barbara Municipal Airport, March 1997
- Revised Wetland Mitigation Plan, Safety Area Grading Project, Santa Barbara Municipal Airport, Woodward-Clyde Consultants/Jones & Stokes, February 1997
- Supporting Environmental Information for the Safety Area Grading Project, Santa Barbara Municipal Airport, Woodward-Clyde Consultants, July 1996

Documents Used City-Wide

- California Environmental Quality Act (CEQA) & CEQA Guidelines
- California Coastal Act of 1976, as amended
- General Plan Interim Circulation Element
- General Plan Conservation Element
- 1995 Housing Element
- General Plan Land Use Element
- General Plan Noise Element w/appendices
- General Plan Map
- General Plan Seismic Safety/Safety Element
- Geology Assessment for the City of Santa Barbara
- Institute of Traffic Engineers Parking Generation Manual
- Institute of Traffic Engineers Trip Generation Manual

Airport Safety Area Grading Project
April 4, 1997

Local Coastal Plan (Main & Airport)

Master Environmental Assessment

Parking Design Standards

Santa Barbara Municipal Code & City Charter

Special District Map

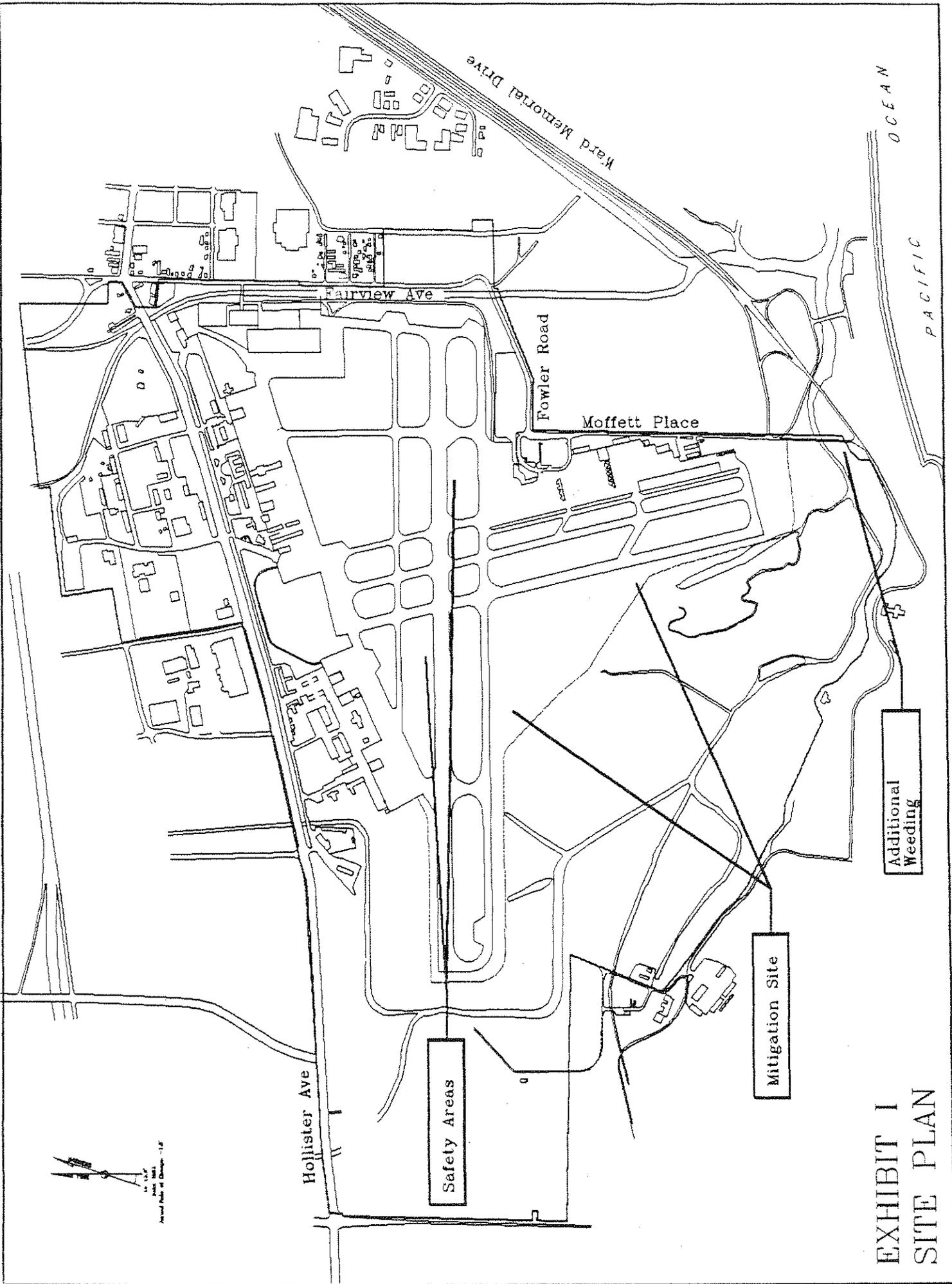
Supporting Environmental Information for the Safety Area Grading Project

Uniform Building Code as adopted by City

Zoning Ordinance & Zoning Map

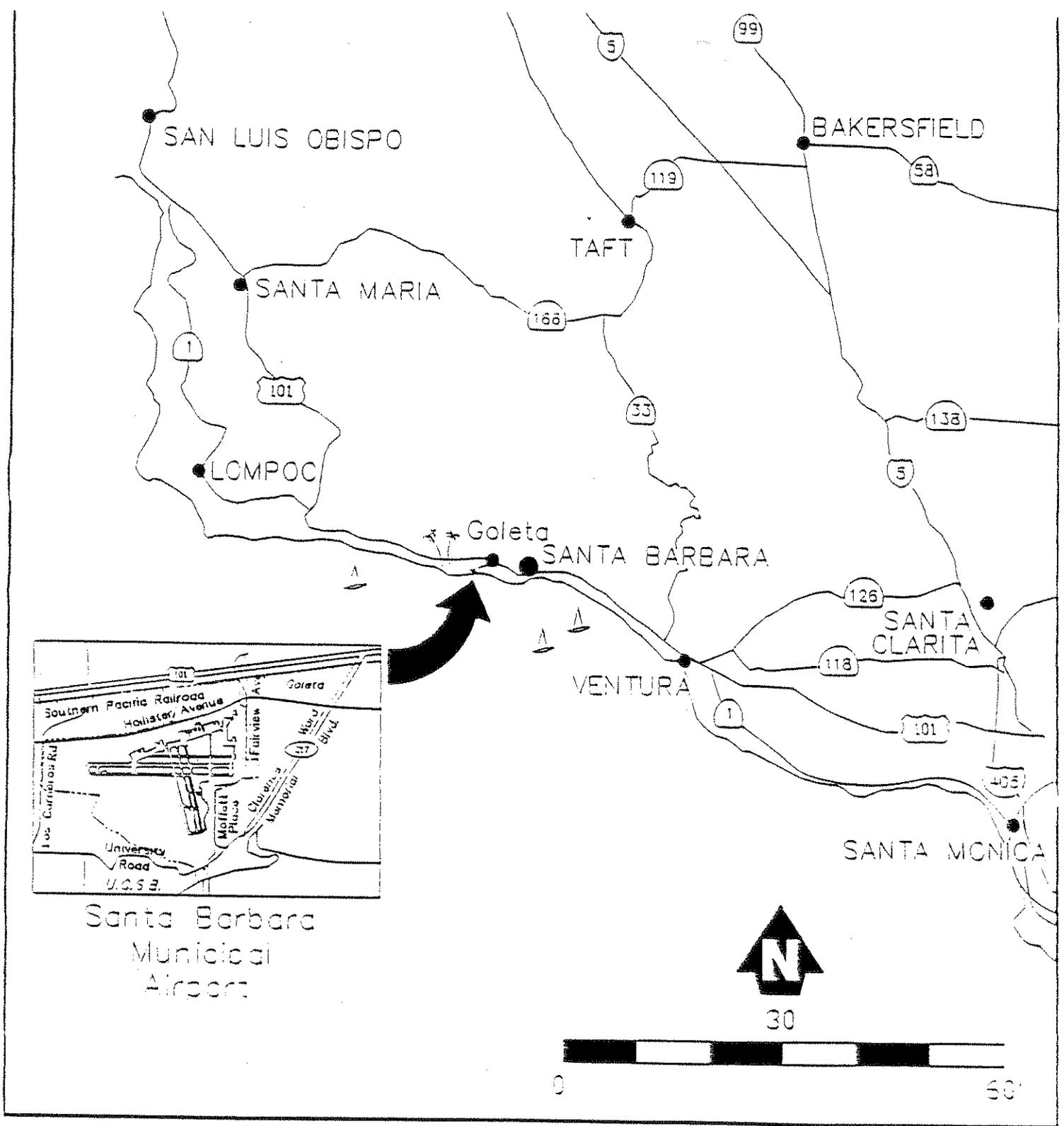
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Revised March 4, 1996

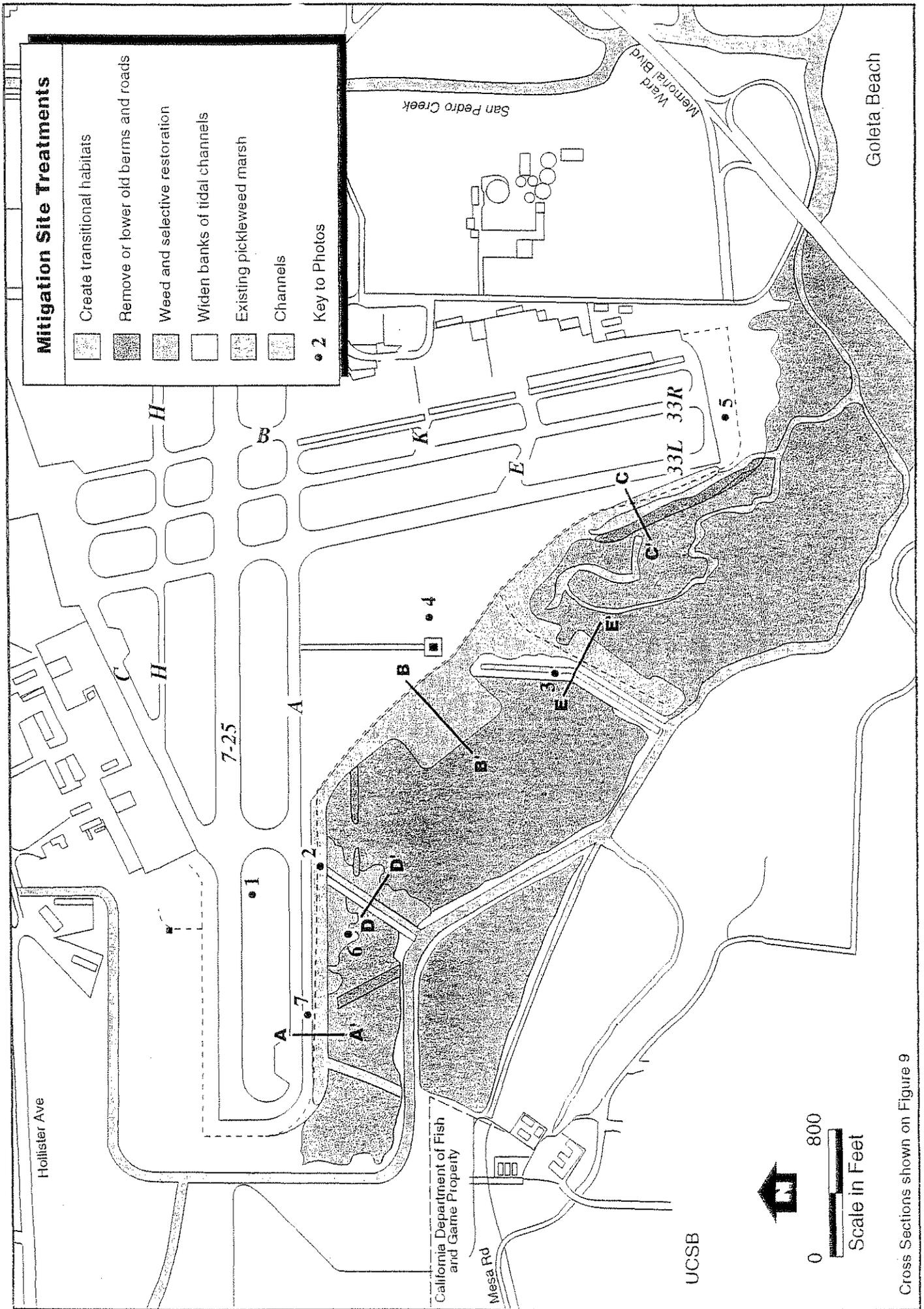


**EXHIBIT I
SITE PLAN**

SANTA BARBARA AIRPORT



Vicinity Map



Cross Sections shown on Figure 9

Exhibit 4. Conceptual Wetland Restoration Plan



COUNTY OF SANTA BARBARA
PROTECTION SERVICES DIVISION
Hazardous Materials Unit

2125 S. Centerpointe Pkwy. #333, Santa Maria, CA 93455 (805) 346-8477 FAX (805) 346-8485
4410 Cathedral Oaks Road, Santa Barbara, CA 93110 (805) 681-5500 FAX (805) 681-5553

November 26, 1996

Mr. Tony Raya
Public Works Department
City of Santa Barbara
630 Garden Street
Santa Barbara, California 93102-1990

Dear Mr. Raya:

RE: Soil Analytical Results from the City of Santa Barbara Airport Slough

Santa Barbara County Protection Services Division (PSD) has received the analytical data for samples taken from 9/95, 12/95 and 10/96, adjacent to the Airport, in the slough. Based on the data received, the lack of any visual discoloration or odors in the area of concern, and the lack of any records to indicate a source of contamination in this area, PSD does not require that any remedial actions occur.

If you have any questions regarding this letter, please telephone me at 686-8169.

Sincerely,

Kate Sulka
Senior Hazardous Materials Specialist

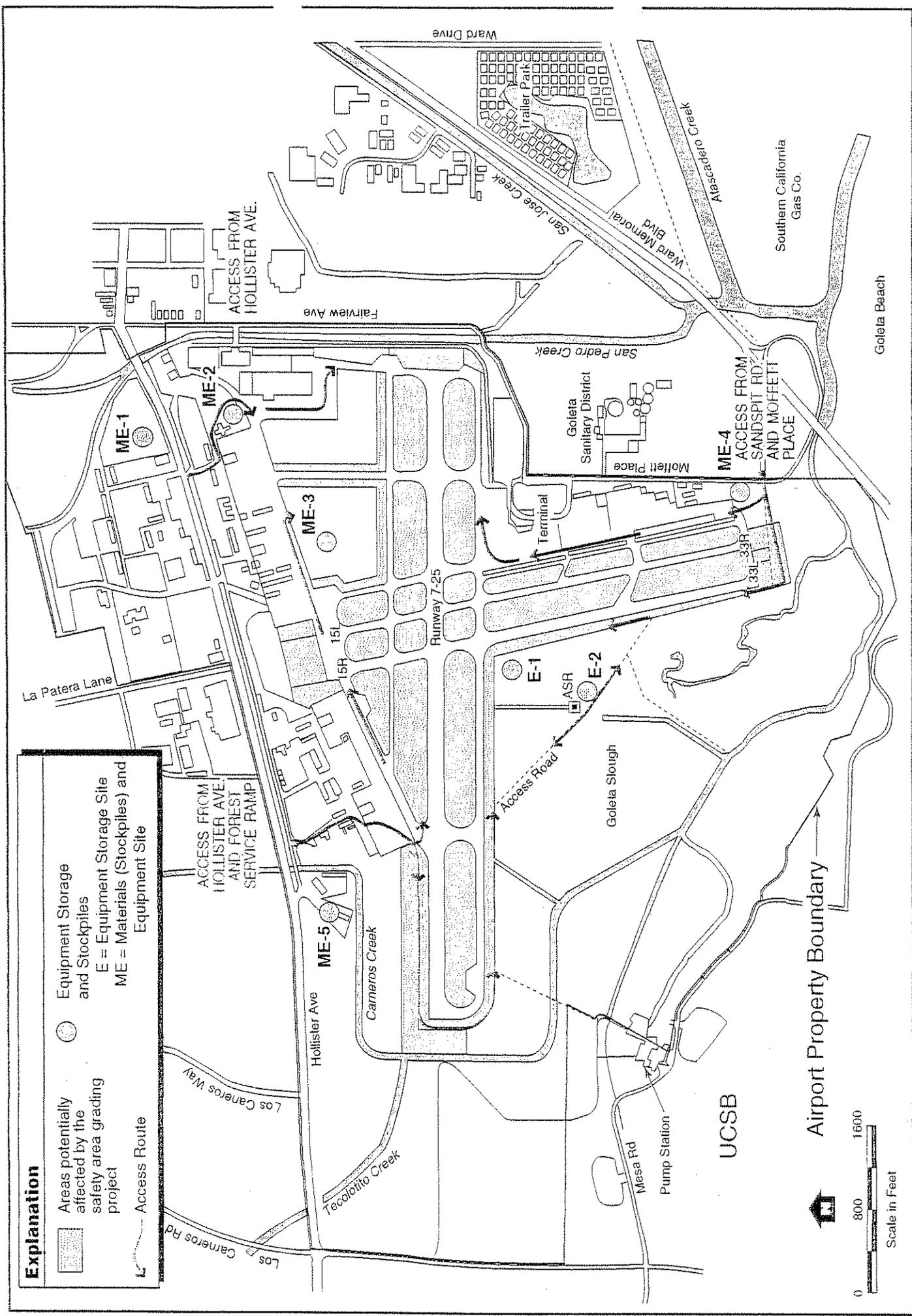
pc: Ms. Cook, Santa Barbara City Airport Administration

smu:wr

EXHIBIT 5

In association with your local Fire Agency for Hazardous Materials Inspections, Spills & Underground Storage Tanks

TOTAL P. 01



Explanation

- Areas potentially affected by the safety area grading project
- Equipment Storage Site and Stockpiles
 - E = Equipment Storage Site
 - ME = Materials (Stockpiles) and Equipment Site
- Access Route

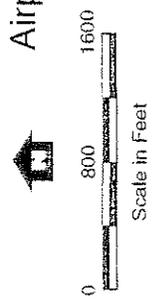
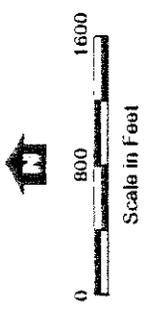
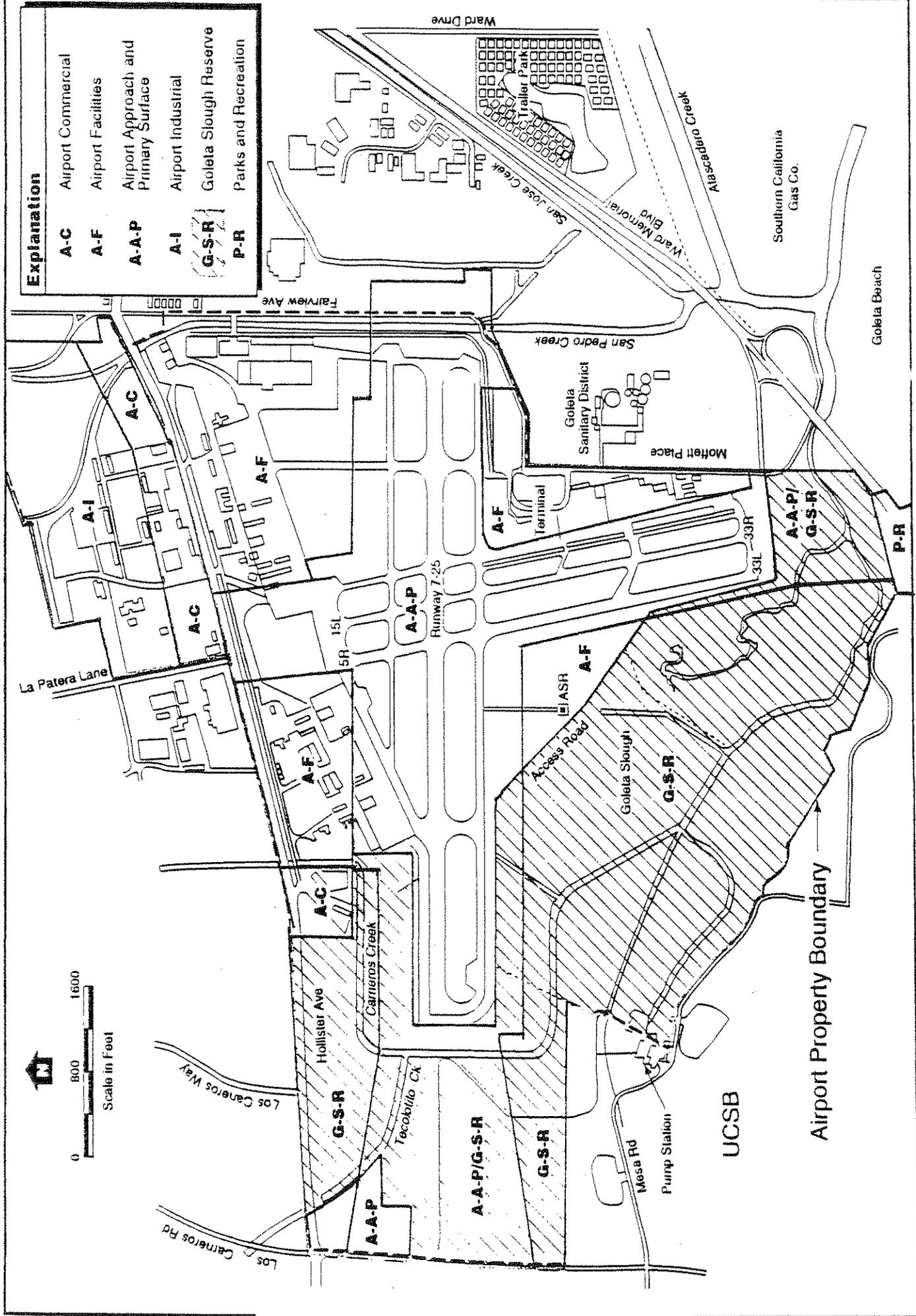
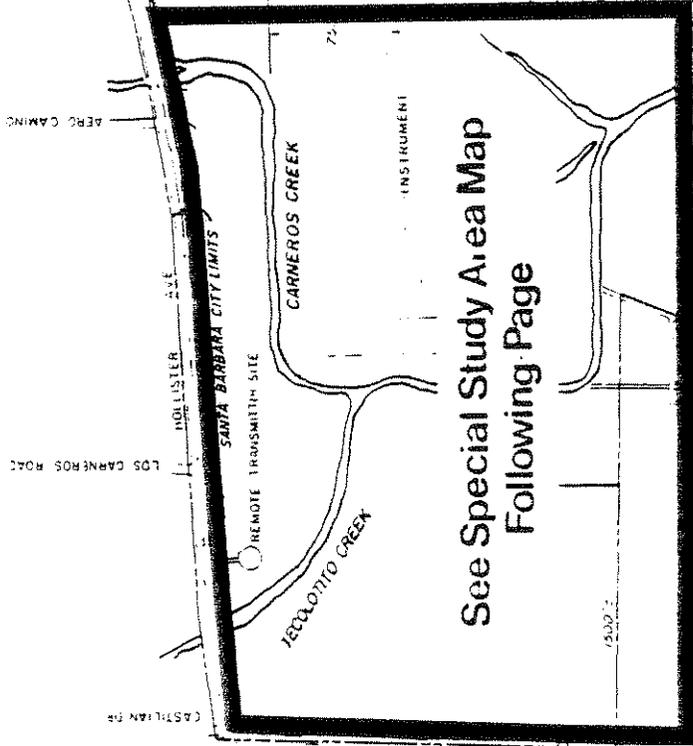


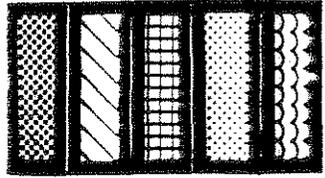
Exhibit 6. Areas Affected by Safety Area Grading Project



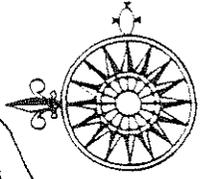
GOLETA SLOUGH HABITAT AREAS



- TIDAL MARSH AND NATURAL CHANNELS
- TIDAL MARSH AND CULVERTS
- POTENTIAL AND RESTORABLE MARSH
- UPLANDS
- FRESH WATER MARSH

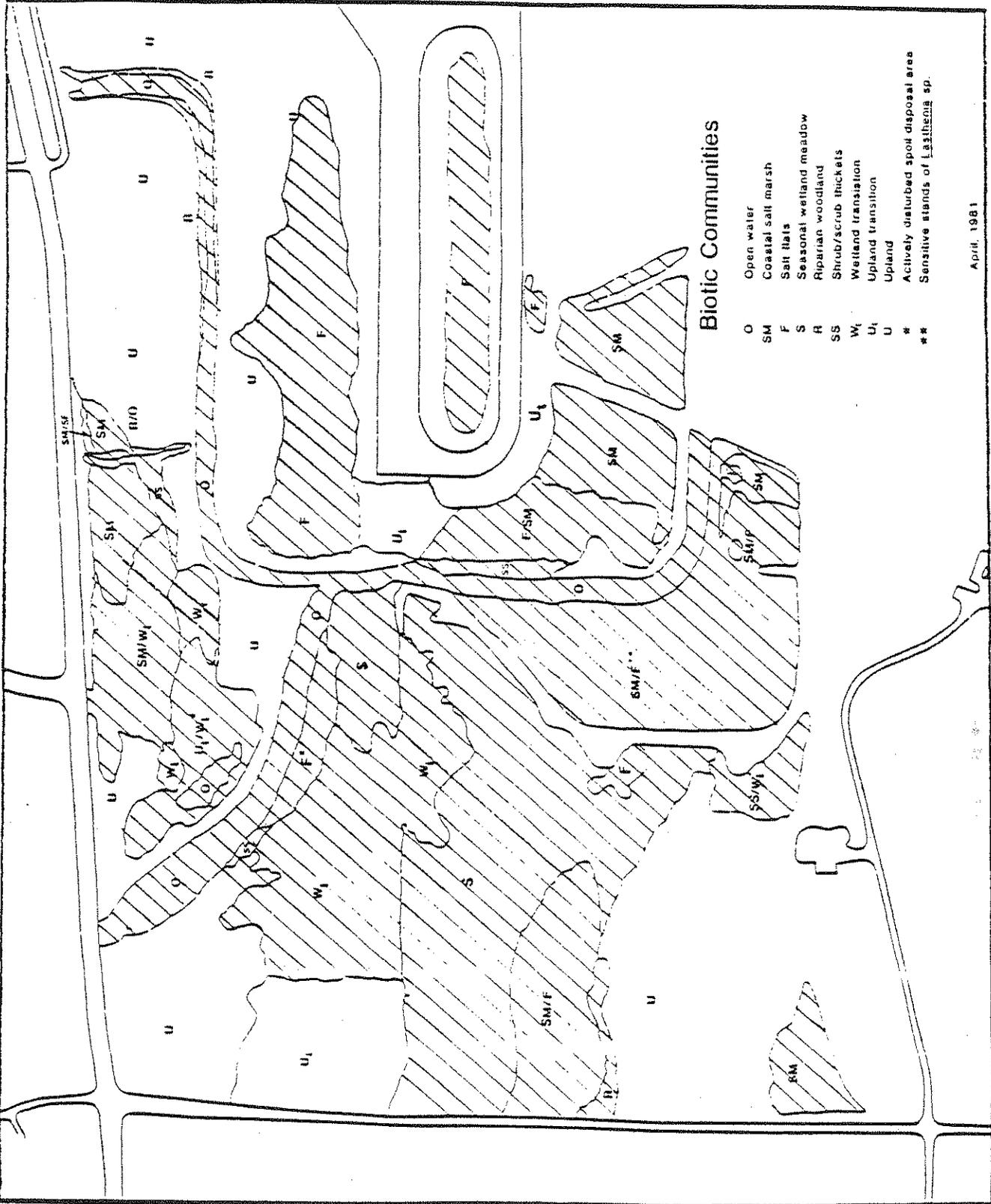


UCSB



Special Study Area
 Northwest Quadrant
 of Goleta Slough

Wetland
 Habitats



Biotic Communities

- O Open water
- SM Coastal salt marsh
- F Salt flats
- S Seasonal wetland meadow
- R Riparian woodland
- SS Shrub/scrub thickets
- W1 Wetland transition
- U1 Upland transition
- U Upland
- * Actively disturbed spoil disposal area
- ** Sensitive stands of *Lasiotheca* sp.

April, 1981

AIRPORT SAFETY AREA GRADING PROJECT
MITIGATION MONITORING AND REPORTING PROGRAM

PURPOSE

The purpose of the Airport Safety Area Grading Project Mitigation Monitoring and Reporting Program (MMRP) is to ensure compliance with all mitigation measures identified in the Initial Study to mitigate or avoid potentially significant adverse environmental impacts resulting from the proposed project. The implementation of this MMRP shall be accomplished by City Planning and Airport staff and consultants. The program shall apply to the following phases of the project:

- Plan and specification preparation
- Pre-construction conference
- Construction of the site improvements
- Post Construction maintenance and monitoring

I. RESPONSIBILITIES AND DUTIES

A qualified representative of the Airport, approved by the City Planning Division and paid for by the Airport, shall be designated as the Project Environmental Coordinator (PEC). The PEC shall be responsible for assuring full compliance with the provisions of this mitigation monitoring and reporting program and the Wetland Mitigation Plan to the City Planning Division. The PEC shall have authority over all other monitors/specialists, the contractor and all construction personnel for those actions that relate to the items listed in this program and the Wetland Mitigation Plan.

It is the responsibility of the contractor to comply with all mitigation measures listed in the attached MMRP matrix. Any problems or concerns between monitors and construction personnel shall be addressed by the PEC and the contractor. The contractor shall prepare a construction schedule subject to the review and approval of the PEC. The contractor shall inform the PEC of any major revisions to the construction schedule at least 48 hours in advance. The PEC and contractor shall meet on a weekly basis in order to assess compliance and review future construction activities.

A. PRE-CONSTRUCTION BRIEFING

The PEC shall prepare a pre-construction project briefing report. The report shall include a list of all mitigation measures and a plot plan delineating all sensitive areas to be avoided. This report shall be provided to all construction personnel.

The pre-construction briefing shall be conducted by the PEC. The briefing shall be attended by the PEC, construction manager, necessary consultants, Planning Division Case Planner, Public Works representative and all contractors and subcontractors associated with the project. Multiple construction briefings shall be conducted as the work progresses if a change in contractor occurs.

The MMRP shall be presented to those in attendance. The briefing presentation shall include project background, the purpose of the MMRP, duties and responsibilities of each participant, communication procedures, monitoring criteria, compliance criteria, filling out of reports and duties and responsibilities of the PEC and project consultants.

It shall be emphasized at this briefing that the PEC and project consultants have the authority to stop construction and redirect construction equipment in order to comply with all mitigation measures.

Once construction commences, field meetings between the PEC and project consultants and contractors shall be held on an as-needed basis in order to create feasible mitigation measures for unanticipated impacts, assess potential effects and resolve conflicts.

II. IMPLEMENTATION PROCEDURES

There are three types of activities which will require monitoring. The first type pertains to the review of the Conditions of Approval and Construction Plans and Specifications. The second type relates to construction activities and the third to ongoing monitoring activities during operation of the project.

A. MONITORING PROCEDURES

The PEC and required consultant(s) shall monitor all field activities. The authority and responsibilities of the PEC and consultant(s) are described in the previous section.

B. REPORTING PROCEDURES

The following three (3) types of reports shall be prepared:

1. Schedule

The PEC and contractor shall prepare a monthly construction schedule to be submitted to the City prior to or at the pre-construction briefing.

2. General Progress Reports

The PEC shall be responsible for preparing written progress reports submitted to the City. These reports would be expected on a weekly basis during grading, excavation and construction activities. The reports would document

field activities and compliance with project mitigation measures, such as dust control and sound reduction construction.

3. Final Report

A final report shall be submitted to the Planning Division when all monitoring (other than long term operational) has been completed and shall include the following:

- a. A brief summary of all monitoring activities.
- b. The date(s) the monitoring occurred.
- c. An identification of any violations and the manner in which they were dealt with.
- d. Any technical reports required, such as noise measurements.
- e. A list of all project mitigation monitors.

C. MMRP MATRIX

The following MMRP Matrix describes each initial study mitigation measure, monitoring activities and the responsibilities of the various parties, along with the timing and frequency of monitoring and reporting activities. For complete language of each condition, the matrix should be used in conjunction with the mitigation measures described in full in the Initial Study.

The MMRP Matrix is intended to be used by all parties involved in monitoring the project mitigation measures, as well as by project contractors and others working in the field. The Matrix should be used as a compliance checklist to aid in compliance verification and monitoring requirements. A copy of the MMRP matrix shall be kept in the project file as verification that compliance with all mitigation measures has occurred.

**AIRPORT SAFETY AREA GRADING PROJECT
MITIGATION MONITORING AND REPORTING PROGRAM MATRIX**

MITIGATION MEASURE	MONITORING REQUIREMENT	RESPONSIBLE ENTITY	MONITOR	ACTION BY MONITOR	TIMING/FREQUENCY	COMPLIANCE CHECK	VERIFICATION
Air Quality 1	Regular water sprinkling should be required, using reclaimed water whenever the Public Works Director determines that it is reasonably available.	Contractor	PEC	Ensure requirements shown on building plans & carried out on site	At building plan check & throughout construction period	City Building Division	
Air Quality 2	Trucks transporting material to & from the site should be tarped from the point of origin. Soil stockpiled for more than 2 days should be covered, kept moist or treated with soil binders. Gravel pads should be installed at all access points to prevent tracking dust onto public roads.	Contractor	PEC	Ensure requirements shown on building plans, truck beds covered appropriately & that plan is followed	At building plan check & throughout construction period.	City Building Division	
Air Quality 3	Construction equipment should be maintained to minimize emissions. Employees should be encouraged to carpool.	Contractor	PEC	Ensure requirements shown on approved plans & followed.	At building plan check & throughout construction period.	City Transportation Division	

**AIRPORT SAFETY AREA GRADING PROJECT
MITIGATION MONITORING AND REPORTING PROGRAM MATRIX**

MITIGATION MEASURE	MONITORING REQUIREMENT	RESPONSIBLE ENTITY	MONITOR	ACTION BY MONITOR	TIMING/FREQUENCY	COMPLIANCE CHECK	VERIFICATION
Biological Resources 1	Semi-Annual reports on the status of the mitigation site are required during the maintenance period.	Airport	PEC/Qualified Restoration Expert/Biologist	Review & approve report	Semi-annually during the 2-year maintenance period.	City Planning Division	
Biological Resources 2	Use of herbicides in mitigation area is subject to review & approval by a qualified restoration expert/biologist as well as Airport.	Airport	PEC/Qualified Restoration Expert/Biologist	Review & approve plan	At building permit & throughout construction, maintenance & monitoring periods	City Planning Division	
Biological Resources 3	All stockpile and equipment storage areas shall be located outside of delineated wetlands & designed to minimize spill into such areas.	Airport/Contractor	PEC	Ensure locations shown on approved plans & followed.	At building plan check & throughout construction period	City Planning Division	
Cultural Resources 1	When ground disturbing activities occur in the area of Site SAIC-93-1, it shall be monitored by an archaeologist with the authority to halt or redirect such activities.	Qualified Archaeologist	PEC	Assure that contract has been activated	Prior to building permit issuance	City Planning Division	

**AIRPORT SAFETY AREA GRADING PROJECT
MITIGATION MONITORING AND REPORTING PROGRAM MATRIX**

MITIGATION MEASURE	MONITORING REQUIREMENT	RESPONSIBLE ENTITY	MONITOR	ACTION BY MONITOR	TIMING/FREQUENCY	COMPLIANCE CHECK	VERIFICATION
Cultural Resources 2	Archaeological monitoring is required during any construction within 50 feet of defined sensitivity zones.	Qualified Archaeologist	PEC	Assure that contract has been activated	Prior to building permit issuance	City Planning Division	
Cultural Resources 3	Construction personnel alerted to possibility of archaeological material; work shall be stopped if materials encountered.	Contractor	PEC	Ensure requirement is on building plans. In event archaeological materials are encountered, PEC shall halt work & contact City Planning & qualified archaeologist.	At building plan check & throughout construction period.	City Planning Division	
Hazards 1	??						

**AIRPORT SAFETY AREA GRADING PROJECT
MITIGATION MONITORING AND REPORTING PROGRAM MATRIX**

MITIGATION MEASURE	MONITORING REQUIREMENT	RESPONSIBLE ENTITY	MONITOR	ACTION BY MONITOR	TIMING/FREQUENCY	COMPLIANCE CHECK	VERIFICATION
Transportation/ Circulation 1	A pre-construction conference shall be scheduled prior to start of construction. Contractor shall prepare a truck routing plan, including no peak hour trips through Fairview/Holister or Fairview/SB 101 Ramps intersections. Free off-street parking shall be provided for all construction workers & storage for equipment & materials shall be provided on-site.	Contractor	PEC	Ensure requirements shown on building plans & that plan is followed	At building plan check & throughout construction period.	City Transportation Division	
Water Resources 1	All recommendations in the Floodway Findings shall be incorporated into the project.	Airport	PEC	Ensure requirements incorporated into building plans & that plan is followed	At building plan check & throughout construction period.	City Building Division	
Water Resources 2	Prepare & implement a Storm Water Pollution Prevention Plan.	Airport	PEC	Ensure requirements incorporated into building plans & that plan is followed	At building plan check & throughout construction period.	City Planning Division	



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Ventura Field Office
2493 Portola Road, Suite B
Ventura, California 93003

RECEIVED

DEC 23 1996

City of Santa Barbara
Airport Department

December 19, 1996

Allison Cook, Airport Planner
Santa Barbara Municipal Airport
City of Santa Barbara
601 Firestone Road
Goleta, California 93117

Subject: Species List for the Proposed Safety Area Grading Project, Santa Barbara
Municipal Airport, Santa Barbara County, California

Dear Ms. Cook:

This letter is in response to your correspondence, dated November 8, 1996 and received by us on November 12, 1996, requesting information on listed and proposed endangered and threatened species which may be present in the vicinity of the proposed safety area grading project at Santa Barbara Municipal Airport, Santa Barbara County, California. The City of Santa Barbara (City) is proposing to regrade the existing dirt safety area for each runway, plan for ongoing and future maintenance activities, and restore, enhance, or create wetland habitats along the margins of Goleta Slough. The enclosed species list will be used by the City during preparation of an environmental assessment, pursuant to the National Environmental Policy Act.

If the proposed project may affect a listed species, the Federal Aviation Administration (FAA), as lead Federal agency has the responsibility to prepare a biological assessment if the project is a construction project which may require an environmental impact statement^{1/}. If a biological assessment is not required, the FAA still has the responsibility to review its proposed activities and determine whether the listed species will be affected.

During the assessment or review process, the FAA may engage in planning efforts, but may not make any irreversible commitment of resources. Such a commitment could constitute a violation of section 7(d) of the Endangered Species Act (Act). If a listed species may be affected, the FAA should request, in writing through our office, formal consultation pursuant to section 7 of the Act. Informal consultation may be used to exchange information and resolve conflicts with respect to listed species prior to a written request for formal consultation.

The City should be aware of section 9 of the Act which prohibits the take of any listed species. The definition of take includes to harass, harm, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct. Harm is further defined as an act which actually kills or injures wildlife. Such act may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavior patterns, including breeding, feeding, or sheltering (50 CFR 17.3). Anyone who engages in a take would be subject to prosecution under section 9 of the Act. Such taking may occur only under the authority of the U.S. Fish & Wildlife Service (Service) pursuant to section 7 or through a section 10(a)(1) (B) permit, as mandated in the Act.

I have enclosed a list of threatened, endangered, and candidate species presently under review by the Service for consideration for Federal listing. Only listed species receive protection under the Act. Candidate species are included for the sole purpose of notifying Federal agencies in advance of possible proposals and listings which at some time in the future may have to be considered in planning Federal activities. Preparation of a biological assessment, as described in section 7(c) of the Act, is not required. If early evaluation of the project indicates that it is likely to adversely affect a candidate species, you may wish to request technical assistance from this office.

Please note that in the most recent review of candidates for listing under the Act (61 Federal Register 7596) the Service discontinued the use of candidate species categories. Candidates are now defined as only those species for which the Service has sufficient biological information to support a proposal to list as endangered or threatened. The Service considers former category 2 candidate species, found in earlier candidate reviews, to be species of concern. It is important to note that by dropping the category 2 candidate designation, the Service is not indicating that the biological status of these species has changed. The Service will work with the States and public and private interests in assessing the need for protection of such species under the Act. We recommend that you review information in the California Department of Fish and Game's Natural Diversity Data Base to determine whether any additional species of concern occur in project areas.

If you have any questions, please contact Kirk Wain of my staff at (805) 644-1766.

Sincerely,



Diane K. Noda
Field Supervisor

Enclosure

**VEGETATION CONDITIONS AND DYNAMICS IN THE
AIRFIELD SAFETY AREA**

SAFETY AREA GRADING PROJECT

SANTA BARBARA AIRPORT

May 2005

Santa Barbara Airport
601 Firestone Road
Santa Barbara, California
Contact: Ms. Laurie Owens

Prepared by:

URS Corporation
130 Robin Hill Road, Suite 100
Goleta, California 93117
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Exhibit: E

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I. INTRODUCTION

The "safety area" at the Santa Barbara Airport (Airport) is comprised of unpaved ends and edges of runways and taxiways, as shown on Figure 1. The Federal Aviation Administration (FAA) requires that the Airport maintain the safety area with a smooth and compacted surface in order to support aircraft passage during emergencies and to minimize damage to the aircraft and occupants. The safety area must also be mowed to reduce plant height, and drained to prevent ponding and saturated soils. The safety area at the Airport encompasses about 127 acres.

In 1997, the City of Santa Barbara (City) Planning Commission approved a Coastal Development Permit (CDP) for the Safety Area Grading Project which is located in the City's permit jurisdiction as shown on Figure 2. The project consisted re-grading and re-compacting the safety area which no longer met FAA standards due to the effects of flooding, rodent activity, wind erosion, and soil movement from plant growth. In the same year, the California Coastal Commission (CCC) issued a CDP for the wetland restoration element of the project which occurs in the original jurisdiction of the CCC. The City CDP has a term of 10 years, and will require renewal in 2007. The CDP from the CCC has no term (see Appendix B).

In late 2005, the Airport will be submitting a request to the City Planning Division for a renewal of the City's CDP. URS has prepared this report in support of the Airport's efforts to renew the CDP. The specific objectives of this report are as follows:

- Describe maintenance history of the safety area since issuance of the CDPs and persistence of wetland-associated plants;
- Describe future maintenance under the CDPs and possible effect on wetland-associated plants in the safety area; and
- Request concurrence from CCC staff that future impacts to wetland-associated plants in the safety area have been fully mitigated and that there is no need for additional mitigation, thereby allowing the Airport to use wetland-associated plants in the safety area for vegetative cover.

2. BACKGROUND

2.1 SCOPE OF SAFETY AREA INITIAL GRADING AND COMPACTING

The Safety Area Grading Project included the re-grading and re-compacting of the entire 127-acre safety area (Figure 1). The grading was conducted in 1999. All vegetation and the upper 2 inches of soil were removed from the safety area. Scrapers and graders were used to grade to a smooth surface, and to ensure proper drainage. Smooth and graded areas were compacted to 90 percent of their relative maximum level of compaction. The average depth of cut during grading operations was about 3 inches; the maximum cut was about 18 inches. The total amount of material excavated in the safety area was about 55,000 cubic yards. This material was replaced with imported clean fill. The infield areas contain drain inlets in the center and are gradually sloped at about 1 to 3 percent.

Most of the airfield and the safety area is comprised of fill placed in formerly tidal areas by the Marine Corps in the 1940s to construct the Marine Corps Air Station for pilot training during World War II. In 1996, it was observed that the safety area contained large patches of high saline soils that had developed over time, most likely due to a combination of high evapo-transpiration moving salts to the surface and residual salts from tideland soils placed by the Marine Corps. The saline soil areas exhibited very sparse vegetative cover (see Appendix C). During the safety area grading in 1999, these areas were excavated to a depth of 6 inches and transported to the nearby 29-acre mitigation site and used to create transitional wetlands on the perimeter of Goleta Slough. Approximately 12,500 cubic yards of saline soils were removed from the safety area in 1999.

Following completion of the grading operations in September 1999, the safety area was hydroseeded with non-native upland grasses with the objective of re-establishing a dense and uniform plant cover. The safety area was hydroseeded using the following seed mix:

- *Hordeum brachyantherum* @ 20 lbs/acre
- *Festuca megalura*, "Zorro" @ 20 lbs/acre
- *Plantago insularis* @ 40 lbs/acre

Fiber mulch was applied at a rate of 1,500 lbs/acre. A polymeric emulsion soil stabilizing agent consisting of a minimum of 45% solids by weight with at least 90% by weight of these solids acrylic was applied at a rate of 125 gallons per acre.

2.2 SCOPE OF APPROVED SAFETY AREA MAINTENANCE

The approved Safety Area Grading Project included ongoing maintenance of the safety area to ensure it meets FAA requirements. The safety area is regularly mowed to keep vegetation short and to exclude woody plants. Mowing is conducted in accordance with the Airport's Wildlife Hazard Management Plan, as required by the FAA. Mowing discourages the use of the safety area by most bird species considered aviation hazards. It also reduces fire hazards and increases visibility in the airfield. Mowing occurs throughout the year on an as needed basis, provided the soils of the safety area are dry enough to allow access by the mower. Mowing occurred prior to the Safety Area Grading Project, and has continued in the same manner since the approval of the project.

The Safety Area Grading Project also specifically included as-needed maintenance grading if irregular surfaces developed due to flooding, natural soil dynamics, wind or rain erosion, or plant growth. The description of the Safety Area Grading Project in the CDP application and Mitigated Negative Declaration stated that the localized grading may be required every 3 to 5 years, and that it is possible that the entire safety area may need to be re-graded and compacted during the 10-year permit period. Graded areas would be re-seeded. Since the issuance of the CDP, the Airport has not re-graded the safety area.

Other future maintenance and repair activities in the safety area that occur on an ongoing and as-needed basis include: (1) repair and rehabilitation of signs, drain inlets, lights, buried storm drains, and utility lines; and (2) rebuilding runway or taxiway shoulders by placing soils, gravel, concrete, or asphalt when the shoulders wear down.

2.3 WETLAND IMPACTS AND MITIGATION

2.3.1 Wetland Impacts in the Safety Area

A comprehensive inventory of vegetation types, including wetlands, was conducted in the safety area in 1995 (Woodward-Clyde Consultants, 1996). The major vegetation types are listed below:

Hydrophytic and/or Halophytic Vegetation:

- Pickleweed Series
- Saltmarsh Sandspurry Series
- Saltgrass Series
- Curly Dock Series
- California Annual Grassland Series (wetland affinities)

Upland Vegetation:

- California Annual Grassland Series (upland affinities)
- Ruderal Series (i.e., weedy and introduced species)

In 1995, there were two major vegetation categories present in the safety area: (1) upland vegetation, and (2) hydrophytic and/or halophytic vegetation. In 1995, most of the safety area was dominated by upland grasslands with the following common introduced species: Italian ryegrass, brome grasses (*Bromus* spp.), slender wild oat (*Avena barbata*), Mediterranean barley, and yellow sweetclover (*Melilotus indica*). Ruderal areas occurred along the margins of the runways and taxiways and were dominated by mustards (*Brassica* spp.), burclover (*Medicago polymorpha*), whitestem filaree (*Erodium moschatum*), and cheeseweed (*Malva parviflora*). Photographs of the safety area in 1995 are presented in Appendix C. An aerial photograph of the safety area in 1996 is shown on Figure 4.

Portions of the safety area contained hydrophytic and/or halophytic vegetation, as shown on Figure 3. These areas were characterized by barren saltflats surrounded with sparse vegetation around the perimeter. The total vegetative cover in these areas was generally less than 40 percent. These areas were dominated by annual and perennial plants that are adapted to both seasonal soil saturation and high soil salinities. These plants were present primarily due to their adaptations to high soil salinities. The most common halophytic (salt tolerant) species included Italian ryegrass (*Lolium multiflorum*), Virginia pickleweed (*Salicornia virginica*), curly dock (*Rumex crispus*), saltgrass (*Distichlis spicata*),

saltmarsh sandspurry (*Spergularia marina*), Mediterranean barley (*Hordeum marinum ssp. gussoneanum*), African brass-buttons (*Cotula coronopifolia*), and sickle grass (*Parapholis incurva*). Of these species, only pickleweed, saltgrass, and saltmarsh sandspurry are native.

The results of Woodward-Clyde Consultants (1996) indicated that most of the apparent "wetlands" in the safety area are more appropriately defined as areas of halophytic vegetation. These sparsely vegetated areas have high soil salinity that appear to be derived from salt marsh soils that were deposited as fill during the construction of the Marine Corps Air Station runways and taxiways. Wetland hydrology is absent from the safety area because it contains a storm drain system and has been graded to facilitate drainage and prevent ponding. Based on this evidence, Woodward-Clyde Consultants (1996) concluded that most of the wetland-like vegetation in the safety area developed in response to high soil salinities rather than in response to saturated soil conditions. The dominant plants at wetland sites are functioning as halophytic plants, rather than hydrophytic plants. These plants can also be found in non-saline sites with wetland conditions (saturated soils or periodic inundation).

Woodward-Clyde Consultants (1996) provided an assessment of the occurrence of jurisdictional wetlands in the safety area using the wetland definitions of the Corps of Engineers and the CCC. The estimated acreage of wetlands in the safety area in 1995 using the different wetland definitions is presented below:

Agency	Criteria	Acreage in 1995
Corps of Engineers	Three characteristics – hydrophytic ("wetland") plants, hydric soils, and prolonged soil moisture or inundation	1.69 acres
Coastal Commission	Only one characteristic need be present (Note: halophytic plants were considered "wetland plants" by the CCC for the Safety Area Grading Project)	22.94 acres

The above acreages of wetlands were confirmed in letters from the Corps, California Department of Fish and Game, and CCC. The occurrence of CCC-defined wetland in the safety area in 1995 is shown on Figure 3.

2.3.2 Wetland Mitigation

To mitigate the loss of up to 22.94 acres of wetlands and wetland-type vegetation in the safety area, the Airport designed and implemented a wetland restoration plan described in Woodward-Clyde Consultants (1997). Approximately 30 acres of transitional wetlands were created along the margins of Goleta Slough by lowering areas with fill, applying saline soils, and creating depressions to capture rainfall. The location of the wetland restoration site is shown on Figure 5. Native wetland plants from Goleta Slough were installed, and substantial areas were seeded with native plant seed. The grading, seeding, and planting of the wetland restoration site were completed in 2000. Since that time, the Airport has been monitoring and maintaining the restoration site as part of a 7-year maintenance program. The wetland restoration was approved by the City and CCC, and included in their CDPs.

2.4 MAINTENANCE HISTORY

Since the completion of the initial grading and compacting in 1999, the Airport has conducted as-needed maintenance in the safety area. The first mowing after the grading was conducted in 2001, when plant height in portions of the safety area did not meet FAA requirements. Since that time, mowing is conducted in the vegetated portions of the safety area about 2-3 times a year, depending upon rainfall amounts and timing.

No grading has been conducted in the safety area since 1999. However, the Airport has recently identified deficiencies in the safety area that will require grading and compacting in the next 1-2 years in order to maintain compliance with the FAA. A substantial portion of the safety area is exhibiting uneven surfaces due to natural soil heaving, effects of plant growth on soil surfaces, and water erosion.

2.5 HISTORY OF EFFORTS TO INCREASE PLANT COVER

The germination rate in the safety area was very poor during the 1999/2000 winter, the first winter following the completion of the grading and hydroseeding. As a consequence, there was very low plant cover one year after the initial safety area grading. The poor germination was due to a combination of several factors. One, the hydroseeding occurred early in the season (September 1999) and much of the mulch layer with seeds dried and was blown away prior to the winter rains in December 1999. Two, the rainfall in the 1999/2000 winter was below average and was insufficient to support successful germination. Three, the plant species used in the seeding mix may not have been the most suitable for the soil conditions in the infield, which began to exhibit high salinities within one year of construction.

To increase plant cover in the safety area, URS and S&S Seeds conducted a site visit in November 2000 to examine soil conditions and to make recommendations on a new seeding mix and method. Victor Schaff of S&S Seeds recommended that the Airport seed one infield area, as a test program, with the following non-native plants which have high tolerances to both dry and saline soil conditions.

Species	Growth Form (all perennials)	Seeding rate (lbs/acre)
<i>Achillea millefolium</i>	Herb	3
<i>Atriplex semibaccata</i>	Herb	3
<i>Puccinella distans</i>	Grass	3
<i>Sporobolus airoides</i>	Grass	3
<i>Elymus canadensis</i>	Grass	3
<i>Elymus junceous</i>	Grass	3
<i>Agropyron elongatum</i>	Grass	3
<i>Agropyron smithii</i>	Grass	3
<i>Comissonia cheiranthifolia</i>	Herb	3
Total		27

In Spring 2002, one infield area was used as a test plot and hydroseeded with the above mixture. The seeding occurred too late in the rainy season (in an otherwise dry year) and as a result, the seeds failed to germinate.

In Winter 2003, prior to attempting additional hydroseeding, Airport staff purchased a small quantity of seeds from each of the species listed in the table above and planted them in flats at the Airport Maintenance Yard using saline soil collected from the safety area and using overhead irrigation to germinate the seeds. Five species germinated and grew reasonably well. The remainder either did not germinate or exhibited poor germination rates. The five most successful species were (in order of highest to lowest germination): *Agropyron elongatum*, *Elymus canadensis*, *Elymus junceous*, *Agropyron smithii*, and *Puccinella distans*.

In Summer 2003, field test plots were planted in portions of the safety area with saline soils, using the above five species that were successful in the test flats. The test plots in the safety area were irrigated every other day to establish the seedlings. None of the species successfully germinated.

In February 2004, Airport staff, on the advice of staff from Parko Seeds, seeded new field test plots using a commercial "Seashore Passpallum" mix. The plots were irrigated to stimulate germination, but none occurred. Parko Seeds advised Airport staff that if this mix, which has been successful in other saline soil situations, did not germinate, they did not expect that other mixes would germinate well either.

3.0 EXISTING VEGETATION CONDITIONS IN THE SAFETY AREA

An aerial photograph of the safety area in 1996, three years prior to the initial grading, is presented on Figure 4.

Aerial photographs of the safety area in February 2003, September 2003, and September 2004 are provided on Figures 6, 7, and 8, respectively. The photographs show that most of the infield areas contain a relatively dense and continuous plant cover. The dominant plants in these areas include: Italian ryegrass, Bermuda grass, Mediterranean barley, plantain, cheeseweed, and sweetclover. With the exception of Italian ryegrass, these are non-native upland species (Table 1). Italian ryegrass has is considered a "FAC" or facultative wetland plant – that is, 50 percent of the time it occurs in wetland areas and 50 percent of the time it occurs in upland areas. The "FAC" designation is sufficient to consider this a wetland plant when applying the CCC wetland definition.

As shown on Figures 6 – 8, many infield areas are barren or contain patches of low plant cover. The margins of these areas contain the following plants, all of which are adapted to high saline conditions: alkali weed, sandspurry, pickleweed, saltgrass, sickle grass, and sea-blite. All but the sickle grass are native species. At this time, approximately 20-30% of the safety area contains these barren or sparsely vegetated areas.

In September 2004, URS conducted a soil salinity survey throughout the safety area to determine if the areas of low plant cover contained higher salinities. The locations of the soil samples are shown on Figure 8. The results were similar to those from the soil survey of the safety area in the 1996 wetland delineation report (Woodward-Clyde Consultants, 1996). The salinities in the barren and sparsely vegetated areas were substantially higher than in the adjacent areas with the dense upland species (see Table 2). Only plants that are adapted to high salinities occur in these areas.

The location and shape of the high salinity patches in the safety area at the present time are very similar to that observed in 1996 (see Figure 4), despite the removal of 12,500 cubic yards of saline soil from the infield areas in 1999. The Airport expected that the removal of the saline soils and the replacement with imported upland soils would facilitate the establishment of upland plants in the safety area in a continuous and dense cover. One of the objectives of the Safety Area Grading Project was to replace the high salinity areas containing wetland-associated plants with upland species. This objective was not accomplished as the high salinity soil areas have persisted.

**TABLE I
COMMON PLANT SPECIES IN THE SAFETY AREA**

Dominant Species		Growth Form	Wetland Status	Exotic or Native	Location
Scientific Name	Common Name				
<i>Ambrosia psilostachya</i> var. <i>californica</i>	Western ragweed	BH	FAC	N	NSF
<i>Atriplex leucophylla</i>	Whiteleaf	PH	FAC*	N	SF
<i>Atriplex patula</i> ssp. <i>patula</i>	Fat hen	AH	FACW	N	NSF
<i>Atriplex semibaccata</i> *	Australian saltbush	PH	FAC	E	SF, NSF
<i>Cressa truxillensis</i> var. <i>truxillensis</i>	Spreading alkali-weed	PH	FACW	N	SF, NSF
<i>Cynodon dactylon</i>	Bermuda grass	PG	FAC	E	SF, NSF
<i>Distichlis spicata</i>	Saltgrass	PG	FACW	N	SF, NSF
<i>Hordeum marinum</i> ssp. <i>gussoneanum</i>	Mediterranean barley	AG	NI	E	NSF
<i>Lactuca serriola</i>	Prickly wild lettuce	AH	FAC	E	NSF, M
<i>Lolium multiflorum</i>	Italian ryegrass	AG	FAC*	E	NSF, M
<i>Malva parviflora</i> *	Cheeseweed	AH		E	M
<i>Mahella leprosa</i>	Alkali-mallow	PH	FAC	N	SF
<i>Melilotus alba</i>	White sweetclover	A/BH	FACU+	N	NSF, M
<i>Melilotus indica</i>	Sourclover	A/BH	FAC	E	NSF, M
<i>Mesembryanthemum nodiflorum</i> *	Slender leaf iceplant	AH	FACU	E	SF
<i>Parapholis incurva</i> *	European sickle-grass	AG	OBL	E	SF, NSF
<i>Picris ecbioides</i>	Bristly ox-tongue	AH	FAC*	E	NSF, M
<i>Piptatherum miliaceum</i>	Smilo grass	PG	(FACU-)	E	M
<i>Plantago lanceolata</i>	Narrowleaf plantain	PH	FAC-	E	NSF, M
<i>Polygonum arenastrum</i> *	Common knotweed	AH	FAC	E	NSF, M
<i>Rumex crispus</i>	Curly dock	PH	FACW-	E	NSF
<i>Sahicornia virginica</i>	Virginia pickleweed	S	OBL	N	SF
<i>Sonchus asper</i> *	Prickly sow-thistle	AH	FAC	E	NSF, M
<i>Sonchus oleraceus</i>	Common sow-thistle	AH	NI*	E	NSF, M
<i>Spergularia marina</i>	Saltmarsh sandspurry	AH	OBL	N	SF
<i>Suaeda calceoliformis</i>	Horned sea-blight	AH	FACW+	N	SF

Location definitions: SF= Salt flats. NSF= Non-salt flats. M= Higher concentration along margins of runway.

Scientific nomenclature follows Hickman (1993) and Skinner and Pavlik (1994).

"" indicates non-native species that have become naturalized or persist without cultivation.*

"#" indicates the wetland status was used from the 1996 USFWS wetland plant list.

Habit definitions: AG = annual grass. AH = annual herb. PG = perennial grass. PH = perennial herb.

Wetland indicator status (Reed 1988), as updated by USFWS in 1996:

OBL = obligate wetland species, occurs almost always in wetlands (>99% probability)

FACW = facultative wetland species, usually found in wetlands (67-99% probability).

FAC = facultative species, equally likely to occur in wetlands or nonwetlands (34-67% probability).

FACU = facultative upland species, usually occur in nonwetlands (67-99% probability).

+ or - symbols are modifiers that indicate greater or lesser affinity for wetland habitats.

NI = no indicator has been assigned due to a lack of information to determine indicator status.

** = a tentative assignment to that indicator status by Reed (1988).*

A blank indicates upland species

**TABLE 2
SOIL SALINITY DATA FROM SAFETY AREA - 2004**

Infield Area (see Figure 8)	Soil Salinity (parts per thousand)		
	Barren Areas	Sparsely Vegetated Areas	Soil Salinities in Densely Vegetated Areas
"O" (east end)	Surface: 8.5 At 3" depth: 4.6	Surface: 21.2 At 3" depth: 2.7	Surface: 0.2 At 3" depth: 1.3
"O" (west end)	At 3" depth: 26.8	At 3" depth: 3.9	At 3" depth: 0.6
"B"	Surface: 20.2 At 3" depth: 9.5	Surface: 8.6 At 3" depth: 6.9	Surface: 1.3 At 3" depth: 1.1

As noted earlier, the most of the airfield is comprised of fill placed by the Marines in the 1940s, and that much of the fill material was derived from tidal areas. It appears that salts in these underlying soils have moved through capillary action to the soil surface over time due the high evapo-transpiration in the safety area. Hence, removal of the upper 6 inches of saline soils in 1999 did not remove the source of the salts, which is located in the lower soil profile. Soon after completion of the safety areas grading, the upward movement of salts began again, creating the high salinity soils that are barren or vegetated with wetland-associated plants. If this hypothesis is accurate, the existing high salinity soil areas will persist indefinitely as the fill soils in the airfield are 3 to 5 feet deep.

4.0 ISSUES TO RESOLVE

The Airport is currently maintaining the safety area under the City's 10-year CDP that expires in 2007. The Coastal Commission CDP does not have an expiration date. Under the CDPs, the Airport will continue to mow the safety area on an as-needed basis. Prior to the expiration of the City CDP, the Airport plans to re-grade and re-compact most of the safety area to remove uneven surfaces and to meet FAA requirements.

The Airport will apply for a renewal of the City CDP in late 2005. The Airport will request that the renewed CDP allow the Airport to continue to maintain the safety area in the same manner, and that impacts to any wetland-associated plants (i.e., the halophytic plants in the high saline areas) would not require mitigation because such mitigation was accomplished under the first CDP in 1999 and 2000.

The City staff report for the Safety Area Grading Project in 1997 stated "A primary concern of the Airport focuses around the potential re-establishment of wetlands within the infield areas. It is not staff's intent that the Airport be required to "re-mitigate" the loss of wetlands that would result from maintenance. It should also be pointed out that it is not the Airport's intent to allow wetlands to re-establish."

The Airport believes that it is infeasible to successfully replace the halophytic plants in the safety area with non-native plants that are not also considered wetland-associated plants. The overriding effect of the high soil salinities will likely result in sparse plant cover in portions of the safety area that can only be vegetated with native halophytic plants. Because these salt tolerant plants are also considered wetland plants, the Airport is concerned that additional mitigation could be required in the future as these plants are subject to removal from re-grading and re-compacting. The Airport believes that no additional mitigation is required because impacts to these wetland-associated plants have been completely mitigated.

It is unlikely that the wetland-associated plants in the safety area will ever be completely removed and replaced with non-native upland plants as demonstrated by the Airport's experience over the past five years. Hence, the native halophytic plants represent the best option for plant cover in the high saline areas. Native halophytic plants in the safety area are beneficial for both the functions of the safety area and the ecological conditions of the nearby Goleta Slough for the following reasons. One, the native halophytic plants provide the only plant cover in these areas; hence, allowing them to remain, and possibly increasing their extent by reseeding with the same species will accomplish one of the objectives of the Safety Area Grading project – continuous plant cover to reduce wind and water erosion. Two, the presence of these native halophytic plants in the safety area, even when mowed, provides a seed source that can be used by the Airport for future restoration projects, and also for natural seed dispersal to Goleta Slough.

The Airport seeks the Coastal Commission staff's viewpoint on allowing the persistence of the wetland-associated plants in the safety area without requiring additional mitigation. Although the Coastal Commission CDP does not apply to the maintenance of the safety area, the viewpoint of the staff will be important for the City to consider when renewing the CDP for the Safety Area Grading Project in 2007.

5.0 REFERENCES

Woodward-Clyde Consultants, 1996. Inventory of Wetlands and Other Native Habitats, Santa Barbara Airport.

Woodward-Clyde Consultants, 1997. Revised Wetland Mitigation Plan, Safety Area Grading Project, Santa Barbara Airport.

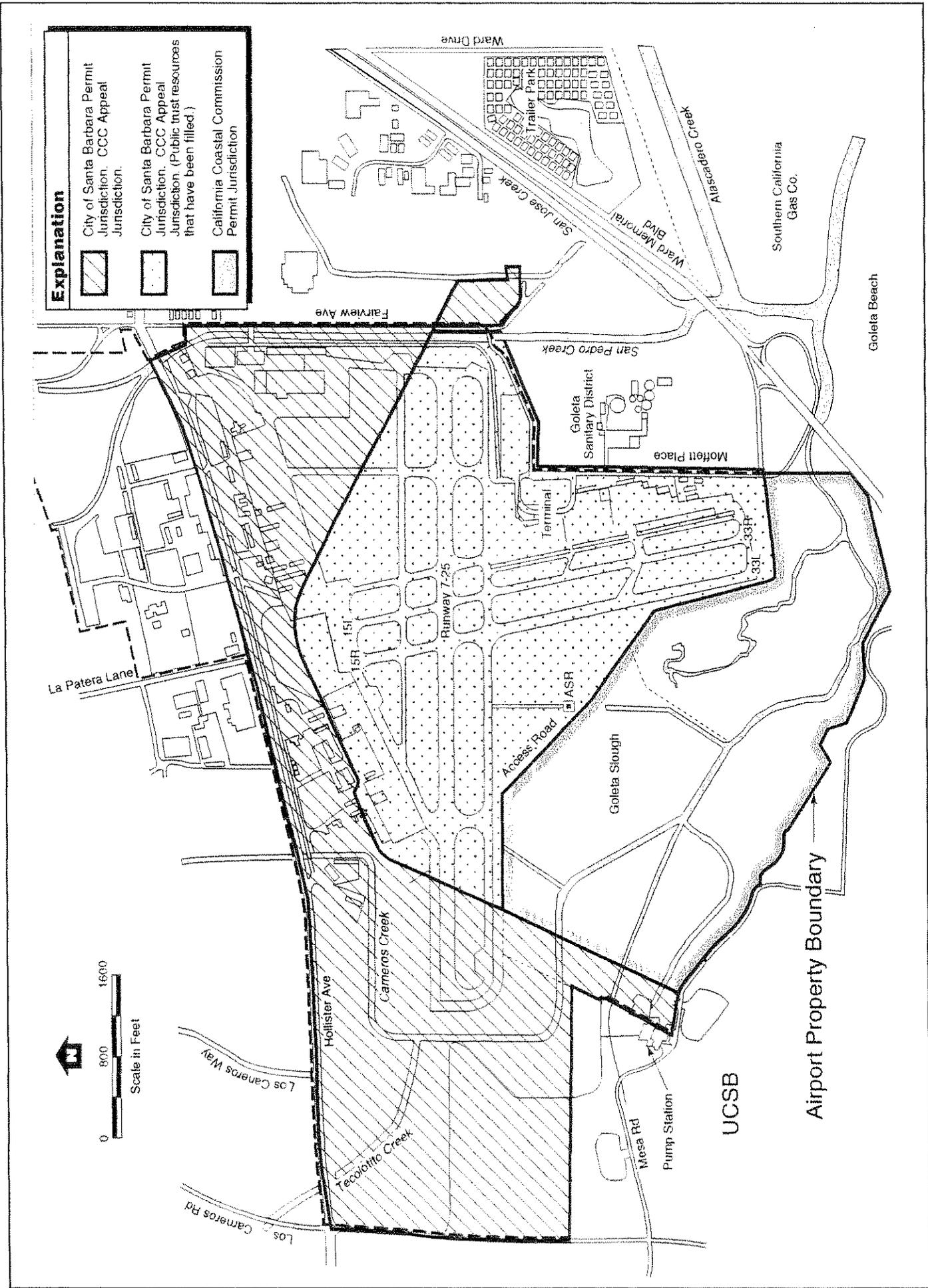
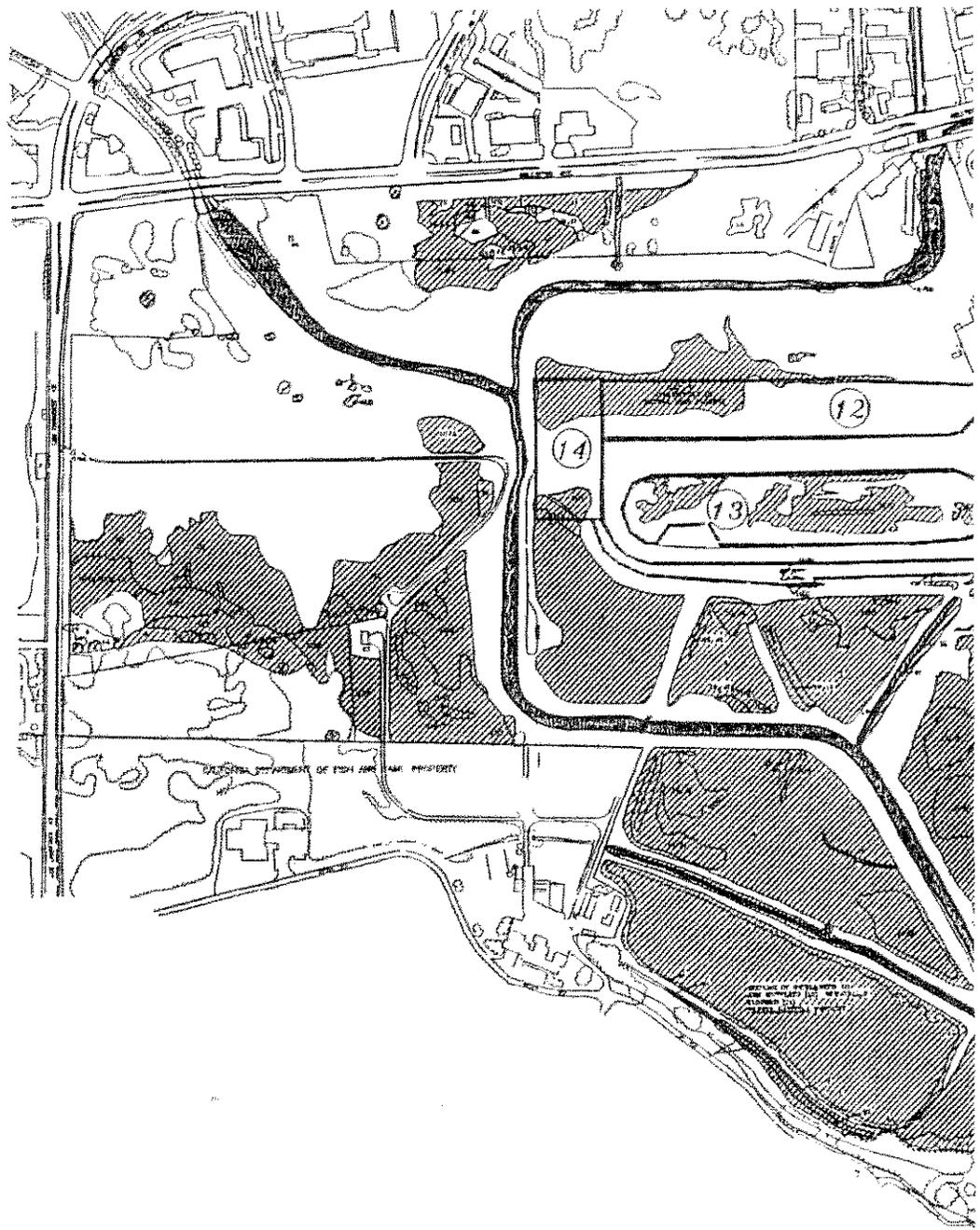


Figure 2. Coastal Zone Permitting Jurisdiction



Note: Shaded areas represent wetlands (vegetated and unvegetated) based on 1995 field investigations. Detailed information and larger maps are provided in WCC (1996a).

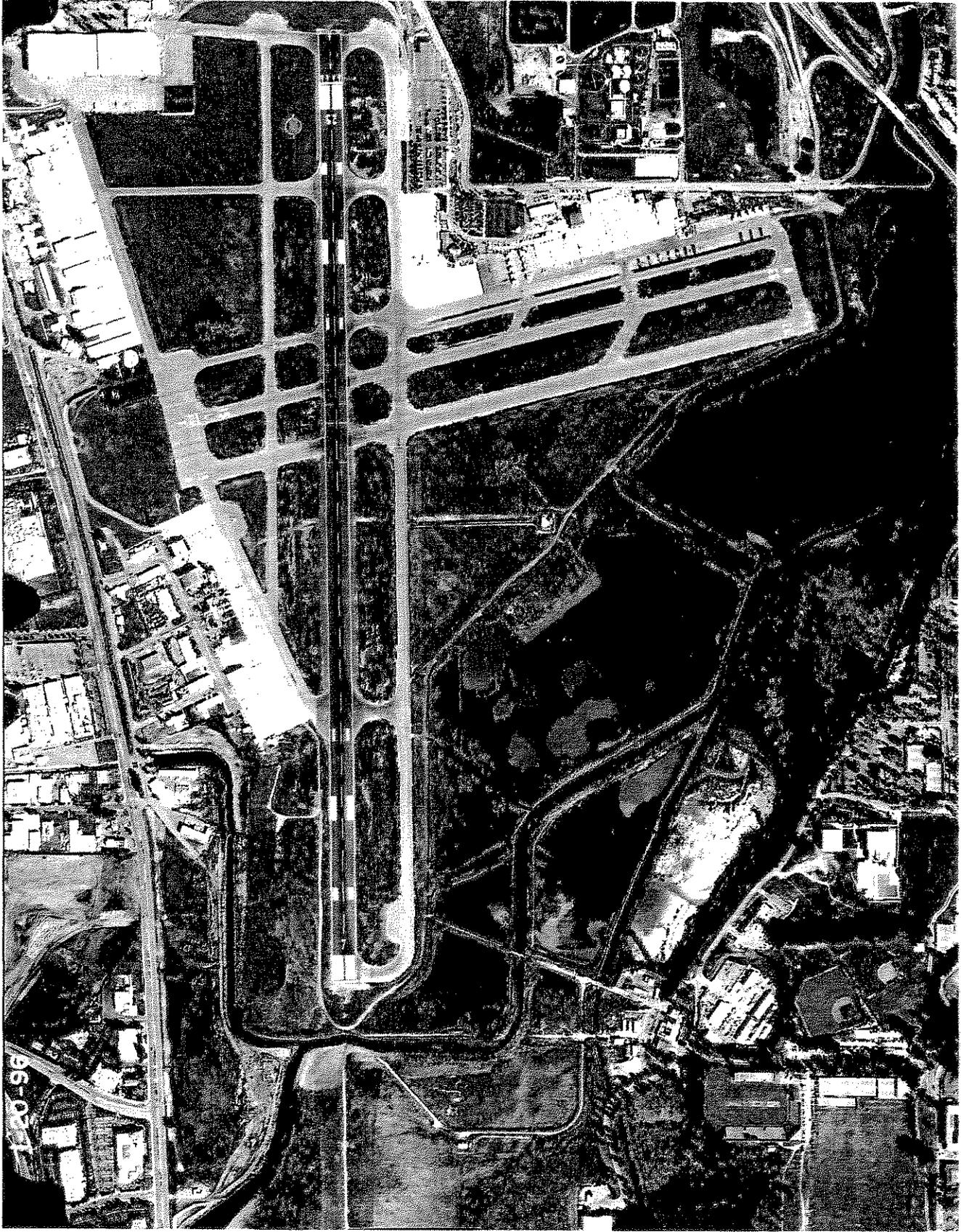
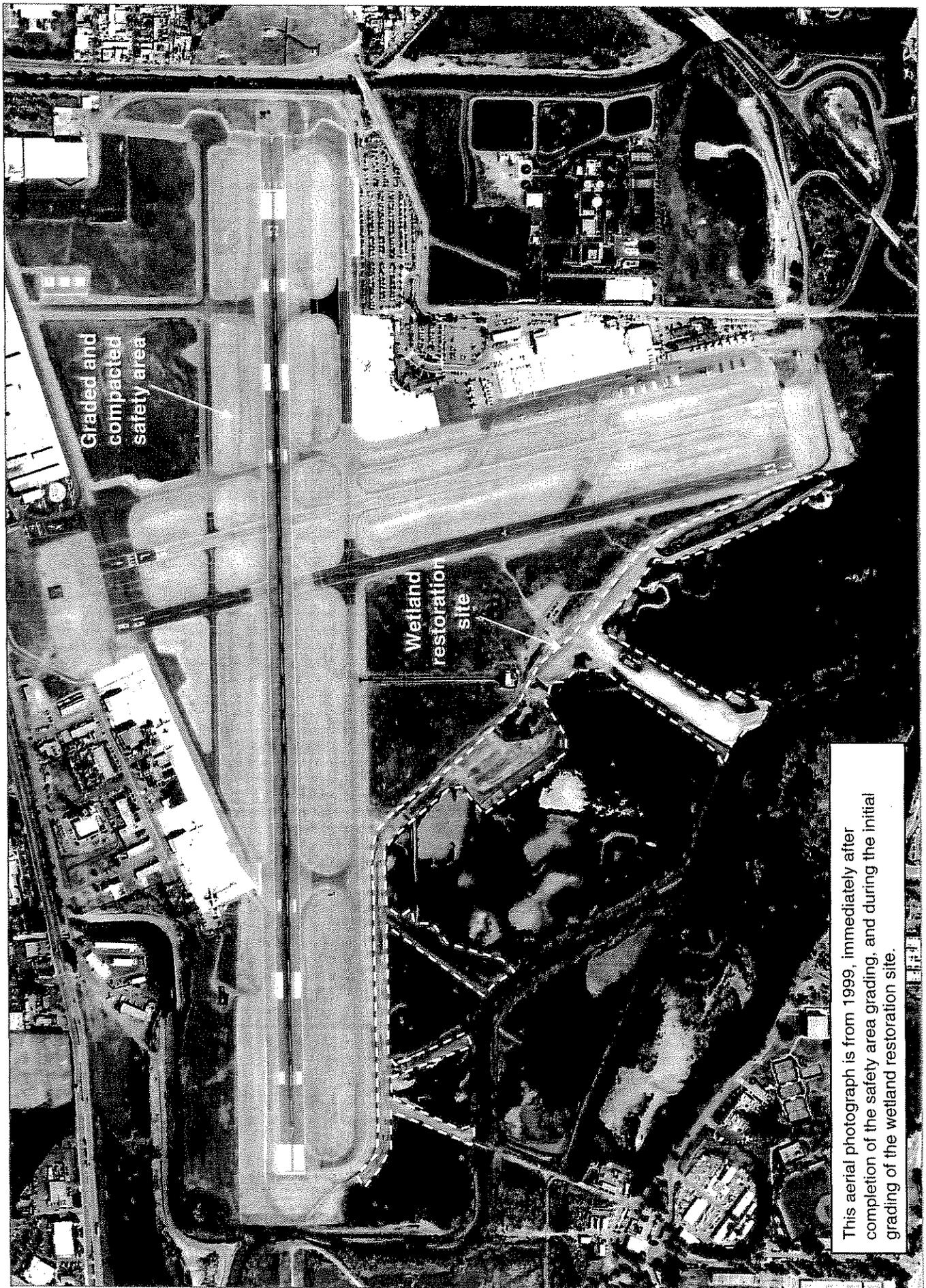
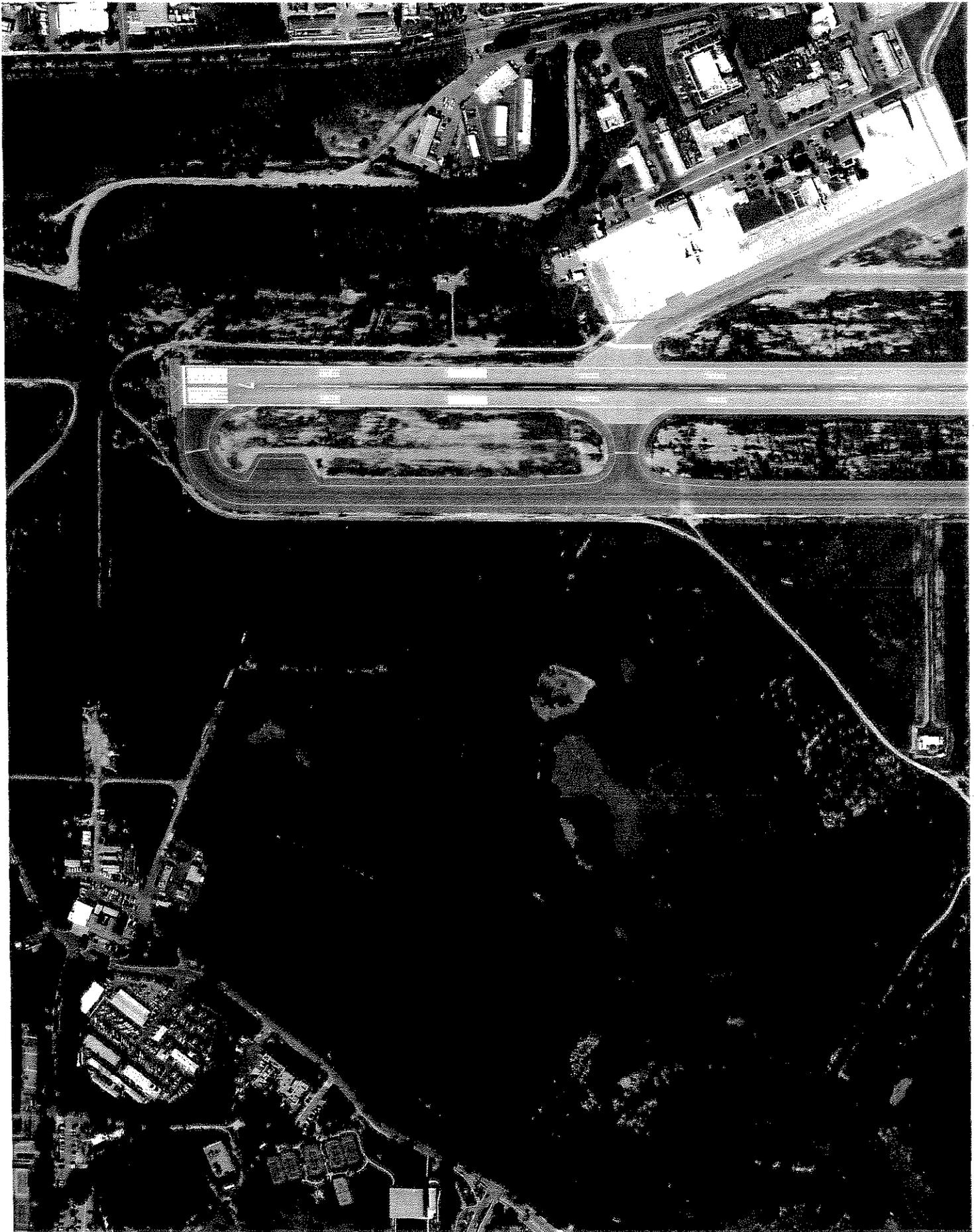


Figure 4. Aerial Photograph of the Safety Area in 1996



This aerial photograph is from 1999, immediately after completion of the safety area grading, and during the initial grading of the wetland restoration site.

Figure 5. Location of the Safety Area Grading Project Wetland Restoration



CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
 89 SOUTH CALIFORNIA ST., SUITE 200
 VENTURA, CA 93001
 (5) 641-0142

SEP 16 1997

WOODWARD
SANTA BARBARA

Page 1 of 2
 Date: September 11, 1997
 Permit No. 4-97-134

COASTAL DEVELOPMENT PERMIT

On September 9, 1997, the California Coastal Commission granted to City of Santa Barbara, Airport Permit 4-97-134, this permit subject to the attached Standard and Special conditions, for development consisting of:

Implementation of wetland creation, restoration, and enhancement consisting of grading and revegetation of 29.8 acres adjacent to the Goleta Slough, and removal and control of exotic vegetation on an additional 1.3 acre site within the Goleta Slough to mitigate impacts of re-grading and compacting existing airport runway and taxiway safety areas, only 3 acres of which are within the Commission's retained original permit jurisdiction and is more specifically described in the application on file in the Commission offices.

The development is within the coastal zone in Santa Barbara County at Santa Barbara Municipal Airport, 601 Firestoe Road, Goleta.

Issued on behalf of the California Coastal Commission by

PETER DOUGLAS
 Executive Director

By: Mark Capelli
 Title: Coastal Program Analyst

ACKNOWLEDGMENT

The undersigned permittee acknowledges receipt of this permit and agrees to abide by all terms and conditions thereof.

The undersigned permittee acknowledges that Government Code Section 818.4 which states in pertinent part, that: "A public entity is not liable for injury caused by the issuance. . . of any permit. . ." applies to the issuance of this permit.

IMPORTANT: THIS PERMIT IS NOT VALID UNLESS AND UNTIL A COPY OF THE PERMIT WITH THE SIGNED ACKNOWLEDGEMENT HAS BEEN RETURNED TO THE COMMISSION OFFICE. 14 Cal. Admin. Code Section 13158(a).

 Date

 Signature of Permittee

A6: 8/95

COASTAL DEVELOPMENT PERMIT

Page 2 of 2
Permit No. 4-97-134

STANDARD CONDITIONS:

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Compliance. All development must occur in strict compliance with the proposal as set forth in the application for permit, subject to any special conditions set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the project during its development, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

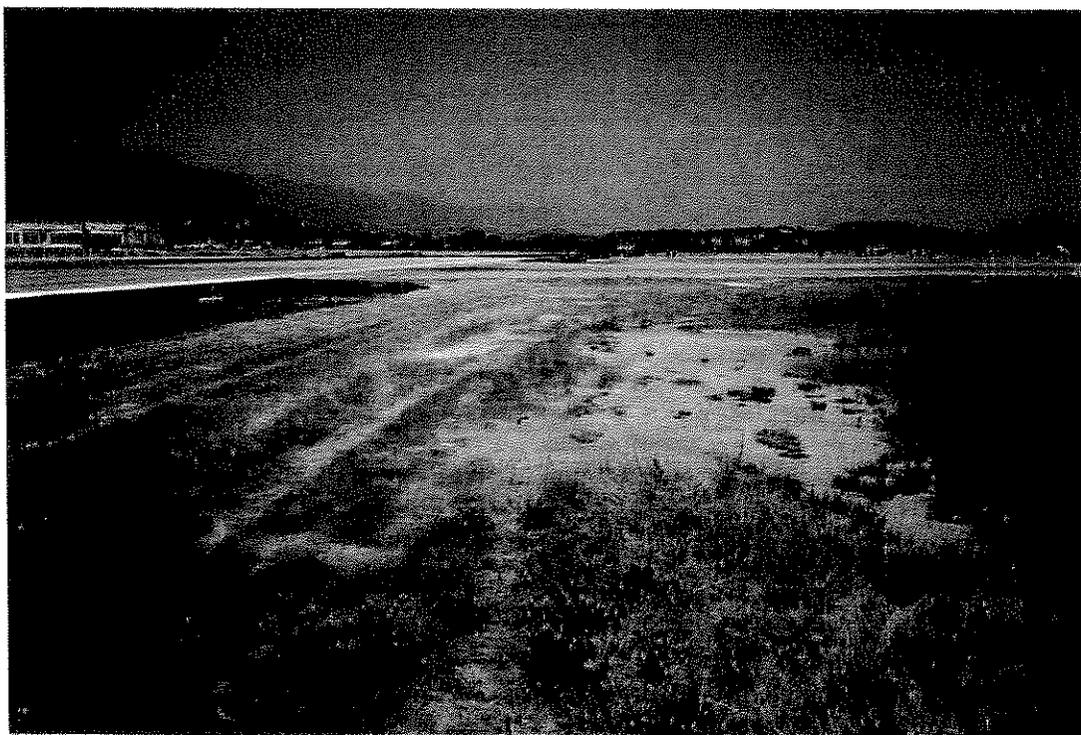
SPECIAL CONDITIONS:

1. Post-Project Monitoring

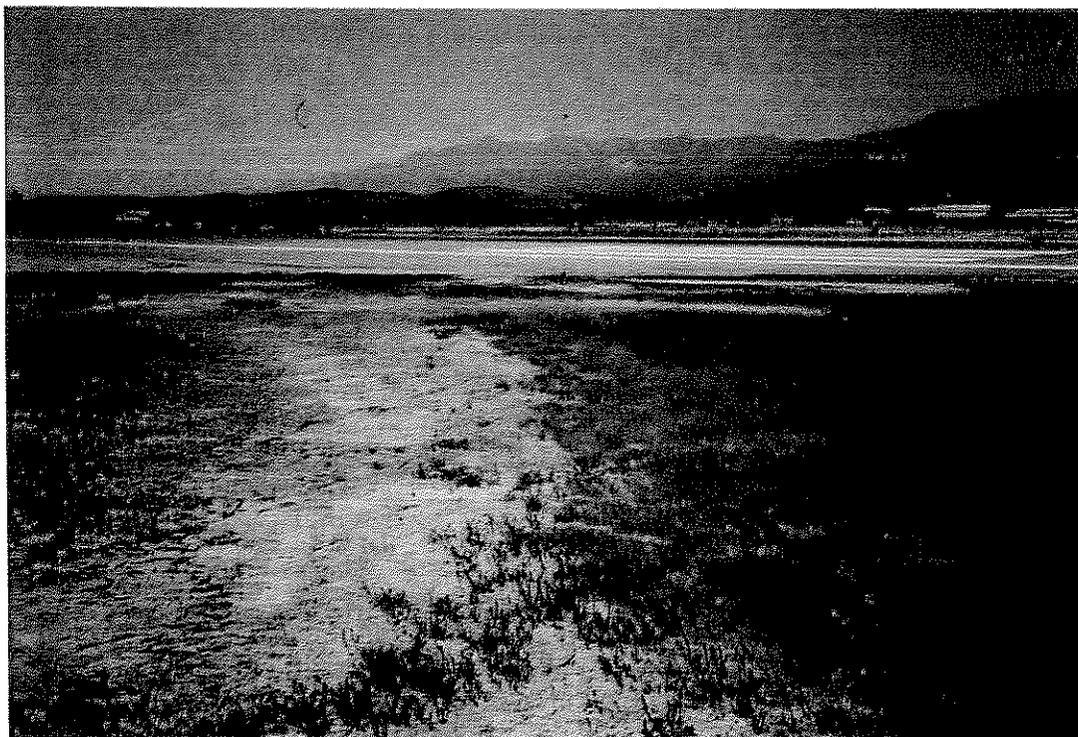
Following completion of the mitigation project, the applicant shall submit to the Executive Director copies of the post-project monitoring reports prepared in conjunction with the mitigation project. These reports shall assess the success of the mitigation measures and identify any remedial actions necessary to ensure complete compliance with the mitigation standards included in the mitigation program.

4012C/MC/dp

1996



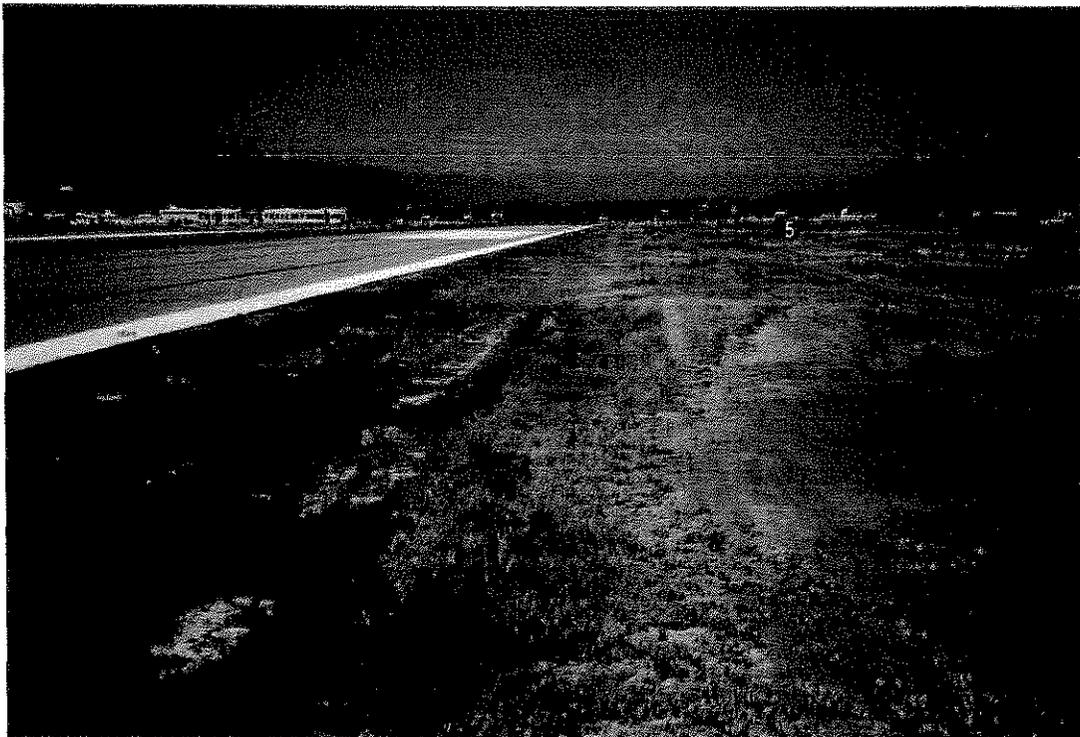
Photographs of the safety area in 1996 prior to the grading and compacting.
Note mosaic of saline and non-saline soil areas.



1996



Photographs of the safety area in 1996 prior to the grading and compacting. Note mosaic of saline and non-saline soil areas.





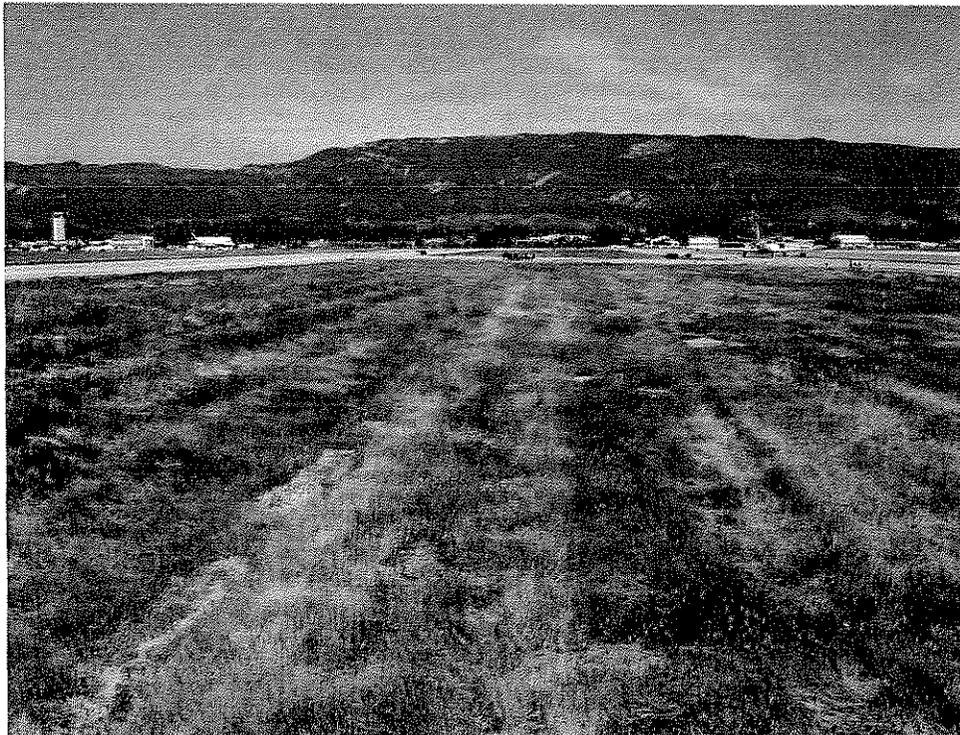
Photograph 1. View of safety area in May 2005. Note absence of vegetation in saline soil areas.



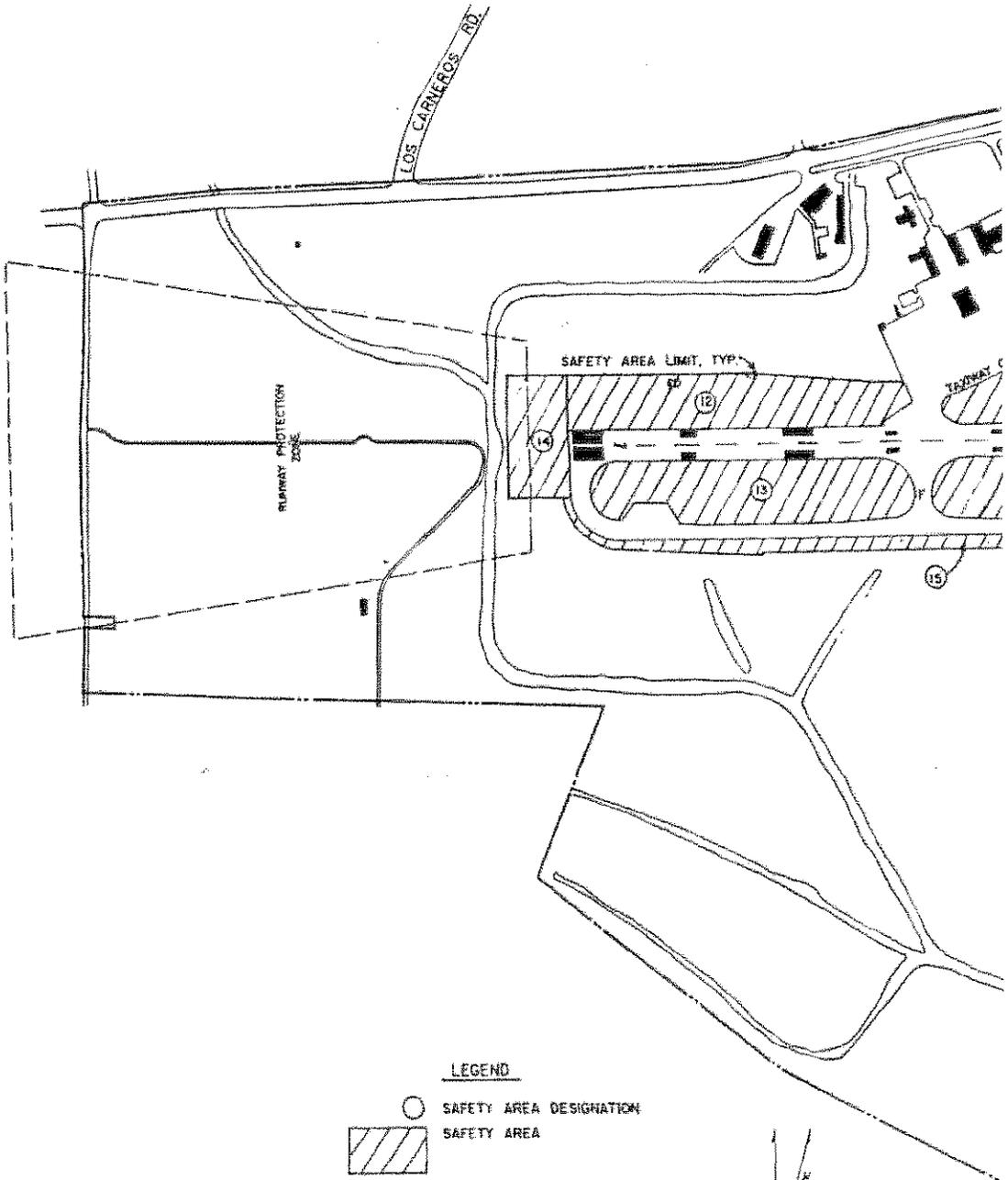
Photograph 2. Portion of the safety area without saline soils, dominated by Italian ryegrass, wild oaks, and plantain.



Photograph 11. Safety area between Runways 12 and 33 where saline soils are generally absent.



Photograph 12. Safety area between Runways 12 and 33 where saline soils are generally absent.



LEGEND

- SAFETY AREA DESIGNATION
- ▨ SAFETY AREA



**VEGETATION CONDITIONS AND DYNAMICS IN THE AIRFIELD
SAFETY AREA**

SAFETY AREA GRADING PROJECT

SANTA BARBARA AIRPORT

March 2007

Santa Barbara Airport
601 Firestone Road
Santa Barbara, California
Contact: Ms. Laurie Owens

Prepared by:

URS Corporation
130 Robin Hill Road, Suite 100
Goleta, California 93117
Contact: Johanna Kisner (LaClaire)

Exhibit: F

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1. INTRODUCTION

The "safety area" at the Santa Barbara Airport (Airport) is comprised of unpaved ends and edges of runways and taxiways, as shown on Figures 1 and Appendix E, Figure 1. The Federal Aviation Administration (FAA) requires that the Airport maintain the safety area with a smooth and compacted surface in order to support aircraft passage during emergencies and to minimize damage to the aircraft and occupants. The safety area must also be mowed to reduce plant height, and drained to prevent ponding and saturated soils. The safety area at the Airport encompasses about 127 acres.

In 1997, the City of Santa Barbara (City) Planning Commission approved a Coastal Development Permit (CDP) for the Safety Area Grading Project which is located in the City's permit jurisdiction as shown in Appendix E, Figure 2. The project consisted of re-grading and re-compacting the safety area which no longer met FAA standards due to the effects of flooding, rodent activity, wind erosion, and soil movement from plant growth. In the same year, the California Coastal Commission (CCC) issued a CDP for the wetland restoration element of the project which occurs in the original jurisdiction of the CCC. The City CDP has a term of 10 years, and will require renewal by April 2007. The CDP from the CCC has no term (see Appendix B of Appendix E). In May 2005, Laurie Owens, Project Planner for the Airport, and John Gray, URS Corporation (URS) biologist met with Coastal Commission staff regarding the need to renew the City CDP in April 2007. Coastal Commission staff agreed that additional mitigation would not be necessary for maintenance of the existing safety areas, or the new safety areas created and mitigated as part of the Airfield Safety Projects (ASP). Coastal Commission staff generated a letter (dated July 28, 2005) confirming that no additional mitigation would be required (see Appendix D).

In March 2007, the Airport will be submitting a request to the City Planning Division for a renewal of the City's CDP. URS has prepared this report in support of the Airport's efforts to renew the CDP. The specific objectives of this report are as follows:

- Describe maintenance history of the safety area since issuance of the CDPs and persistence of wetland-associated plants;
- Describe future maintenance under the CDPs and possible effect on wetland-associated plants in the safety area; and
- Update the May 2005 URS Report "*Vegetation Conditions and Dynamics in the Airfield Safety Area*" (see Appendix E) and include the new safety areas resulting from implementation of the ASP

2. BACKGROUND

2.1 SCOPE OF SAFETY AREA INITIAL GRADING AND COMPACTING

The Safety Area Grading Project included the re-grading and re-compacting of the entire 127-acre safety area (Appendix E, Figure 1). The grading was conducted in 1999. All vegetation and the upper 2 inches of soil were removed from the safety area. Scrapers and graders were used to grade to a smooth surface, and to ensure proper drainage. Smooth and graded areas were compacted to 90 percent of their relative maximum level of compaction. The average depth of cut during grading operations was about 3 inches; the maximum cut was about 18 inches. The total amount of material excavated in the safety area was about 55,000 cubic yards. This material was replaced with imported clean fill. The infield areas contain drain inlets in the center and are gradually sloped at about 1 to 3 percent.

Most of the airfield and the safety area is comprised of fill placed in formerly tidal areas by the Marine Corps in the 1940s to construct the Marine Corps Air Station for pilot training during World War II. In 1996, it was observed that the safety area contained large patches of high saline soils that had developed over time, most likely due to a combination of high evapo-transpiration moving salts to the surface and residual salts from tideland soils placed by the Marine Corps. The saline soil areas exhibited very sparse vegetative cover (see Appendix C of Appendix E). During the safety area grading in 1999, these areas were excavated to a depth of 6 inches and transported to the nearby 29-acre mitigation site and used to create transitional wetlands on the perimeter of Goleta Slough. Approximately 12,500 cubic yards of saline soils were removed from the safety area in 1999.

Following completion of the grading operations in September 1999, the safety area was hydroseeded with one native grass (non-local genotype) and a non-native grass and forb with the objective of re-establishing a dense and uniform plant cover. The safety area was hydroseeded using the following seed mix:

- *Hordeum brachyantherum* @ 20 lbs/acre
- *Festuca megalura*, "Zorro" @ 20 lbs/acre
- *Plantago insularis* @ 40 lbs/acre

Fiber mulch was applied at a rate of 1,500 lbs/acre. A polymeric emulsion soil stabilizing agent consisting of a minimum of 45% solids by weight with at least 90% by weight of these solids acrylic was applied at a rate of 125 gallons per acre.

2.2 SCOPE OF APPROVED SAFETY AREA MAINTENANCE

The approved Safety Area Grading Project included ongoing maintenance of the safety area to ensure it meets FAA requirements. The safety area is regularly mowed to keep vegetation short and to exclude woody plants. Mowing is conducted in accordance with the Airport's Wildlife Hazard Management Plan, as required by the FAA. Mowing discourages the use of the safety area by most bird species considered aviation hazards. It also reduces fire hazards and increases visibility in the airfield. Mowing occurs throughout the year on an as needed basis, provided the soils of the safety

area are dry enough to allow access by the mower. Mowing occurred prior to the Safety Area Grading Project, and has continued in the same manner since the approval of the project. The Safety Area Grading Project also specifically included as-needed maintenance grading if irregular surfaces developed due to flooding, natural soil dynamics, wind or rain erosion, or plant growth. The description of the Safety Area Grading Project in the CDP application and Mitigated Negative Declaration stated that the localized grading may be required every 3 to 5 years, and that it is possible that the entire safety area may need to be re-graded and compacted during the 10-year permit period. Graded areas would be re-seeded. Since the issuance of the CDP, the Airport has not re-graded the safety area; however, there was some grading and paving associated with the construction of Taxiway M.

In 2001, the City Council approved the Aviation Facilities Plan for the Airport, which provides for various new facilities and improvements at the Airport to meet the current airfield safety standards of the FAA, and to address future aviation, traveler, and safety needs over the next 15 years. Under this plan, a series of new facilities were proposed called Airfield Safety Projects (ASP). Taxiway M, which is part of the ASP was constructed in 2005-2006 to improve aircraft operational safety for general aviation aircraft which must cross Runway 7-25. It provides a more direct taxi route to the northwest ramp area from the parallel runways and requires only one runway crossing at Runway 7-25. Taxiway M has been constructed as a 50-foot wide taxiway with 20-foot wide paved shoulders for a length of approximately 2,450 feet. Taxiway M parallels Runway 15R-33L. Portions of the safety areas were paved and a new safety area was created as a result of constructing Taxiway M, as shown in Figure 1.

Other future maintenance and repair activities in the safety area that occur on an ongoing and as-needed basis include: (1) repair and rehabilitation of signs, drain inlets, lights, buried storm drains, and utility lines; and (2) rebuilding runway or taxiway shoulders by placing soils, gravel, concrete, or asphalt when the shoulders wear down.

In summer of 2007, new runway safety areas (RSAs) will be constructed as part of the ASPs at the east and west end of Runway 7-25 in order to meet new FAA safety standards. To accommodate the 800-foot runway relocation and the new 1,000-foot RSA at the west end of the runway, Tecolotito Creek was relocated in 2006 in an alignment approximately 1,800 west of its prior location (see Figure 1). The confluence of Carneros Creek with Tecolotito Creek was also relocated to the west as part of the project. New safety areas as a result of the Runway Relocation Project area shown in Figure 1. Approximately 47.34 acres will be graded in the new RSA and surrounding areas including some existing infield safety areas. Approximately 57 acres of disturbed and graded areas will be reseeded with local native seeds collected from the Airport and nearby areas and a sterile grass seed called "regreen" (see Appendix C).

2.3 WETLAND IMPACTS AND MITIGATION

2.3.1 Wetland Impacts in the Safety Area

A comprehensive inventory of vegetation types, including wetlands, was conducted in the safety area in 1995 (Woodward-Clyde Consultants, 1996). The major vegetation types are listed below:

Hydrophytic and/or Halophytic Vegetation:

- Pickleweed Series
- Saltmarsh Sandspurry Series
- Saltgrass Series
- Curly Dock Series
- California Annual Grassland Series (wetland affinities)

Upland Vegetation:

- California Annual Grassland Series (upland affinities)
- Ruderal Series (i.e., weedy and introduced species)

In 1995, there were two major vegetation categories present in the safety area: (1) upland vegetation, and (2) hydrophytic and/or halophytic vegetation. In 1995, most of the safety area was dominated by upland grasslands with the following common introduced species: Italian ryegrass, brome grasses (*Bromus* spp.), slender wild oat (*Avena barbata*), Mediterranean barley, and yellow sweetclover (*Melilotus indica*). Ruderal areas occurred along the margins of the runways and taxiways and were dominated by mustards (*Brassica* spp.), burclover (*Medicago polymorpha*), whitestem filaree (*Erodium moschatum*), and cheeseweed (*Malva parviflora*). Photographs of the safety area in 1995 are presented in Appendix C of Appendix E. An aerial photograph of the safety area in 1996 is shown in Appendix E, Figure 4.

Portions of the safety area contained hydrophytic and/or halophytic vegetation, as shown in Appendix E, Figure 3. These areas were characterized by barren saltflats surrounded with sparse vegetation around the perimeter. The total vegetative cover in these areas was generally less than 40 percent. These areas were dominated by annual and perennial plants that are adapted to both seasonal soil saturation and high soil salinities. These plants were present primarily due to their adaptations to high soil salinities. The most common halophytic (salt tolerant) species included Italian ryegrass (*Lolium multiflorum*), Virginia pickleweed (*Salicornia virginica*), curly dock (*Rumex crispus*), saltgrass (*Distichlis spicata*), saltmarsh sandspurry (*Spergularia marina*), Mediterranean barley (*Hordeum marinum* ssp. *gussoneanum*), African brass-buttons (*Cotula coronopifolia*), and sickle grass (*Parapholis incurva*). Of these species, only pickleweed, saltgrass, and saltmarsh sandspurry are native.

The results of Woodward-Clyde Consultants (1996) indicated that most of the apparent "wetlands" in the safety area are more appropriately defined as areas of halophytic vegetation. These sparsely vegetated areas have high soil salinity that appear to be derived from salt marsh soils that were deposited as fill during the construction of the Marine Corps Air Station runways and taxiways. Wetland hydrology is absent from the safety area because it contains a storm drain system and has been graded to facilitate drainage and prevent ponding. Based on this evidence, Woodward-Clyde Consultants (1996) concluded that most of the wetland-like vegetation in the safety area developed in response to high soil salinities rather than in response to saturated soil conditions. The dominant plants at wetland sites are functioning as halophytic plants, rather than hydrophytic plants. These plants can also be found in non-saline sites with wetland conditions (saturated soils or periodic inundation).

Woodward-Clyde Consultants (1996) provided an assessment of the occurrence of jurisdictional wetlands in the safety area using the wetland definitions of the Corps of Engineers and the CCC. The estimated acreage of wetlands in the safety area in 1995 using the different wetland definitions is presented below:

Agency	Criteria	Acreage in 1995
Corps of Engineers	Three characteristics – hydrophytic (“wetland”) plants, hydric soils, and prolonged soil moisture or inundation	1.69 acres
Coastal Commission	Only one characteristic need be present (Note: halophytic plants were considered “wetland plants” by the CCC for the Safety Area Grading Project)	22.94 acres

The above acreages of wetlands were confirmed in letters from the Corps, California Department of Fish and Game, and CCC. The occurrence of CCC-defined wetland in the safety area in 1995 is shown in Appendix E, Figure 3.

2.3.2 Wetland Mitigation

To mitigate the loss of up to 22.94 acres of wetlands and wetland-type vegetation in the safety area, the Airport designed and implemented a wetland restoration plan described in Woodward-Clyde Consultants (1997). Approximately 30 acres of transitional wetlands were created along the margins of Goleta Slough by lowering areas with fill, applying saline soils, and creating depressions to capture rainfall. The location of the wetland restoration site is shown in Appendix E, Figure 5. Native wetland plants from Goleta Slough were installed, and substantial areas were seeded with native plant seed. The grading, seeding, and planting of the wetland restoration site were completed in 2000. Since that time, the Airport has been monitoring and maintaining the restoration site as part of a 7-year maintenance program. The wetland restoration was approved by the City and CCC, and included in their CDPs.

In addition, URS Corporation was retained to help develop a Wetland Mitigation Plan and an Upland Habitat Mitigation Plan for impacts due to the ASP, including the construction of a new Runway Safety Area (RSA) at the end of Runway 7-25 and relocation of Tecolotito and Cameros creeks. The Airport proposed to create and/or restore seasonal wetlands, open water, and upland habitat similar to those affected by the project (e.g., “in-kind replacement”). Specific restoration projects included reseeding 33 acres of berms along Tecolotito Creek and areas affected by the creek realignment, planting 7.25 acres of banks and berms on the new creeks, restoration of seasonal wetlands and upland habitats at Area I (12 acres) and R-2 (4.7 acres) (Figure 2).

2.4 MAINTENANCE HISTORY

Since the completion of the initial grading and compacting in 1999, the Airport has conducted as-needed maintenance in the safety area. The first mowing after the grading was conducted in 2001, when plant height in portions of the safety area did not meet FAA requirements. Since that time, mowing is conducted in the vegetated portions of the safety area about 2-3 times a year, depending upon rainfall amounts and timing.

No grading has been conducted in the safety area since 1999, with the exception of grading associated with the ASPs. However, the Airport has recently identified deficiencies in the safety area that will require some minor earthwork over the next couple years to smooth uneven surfaces as a

result of natural soil heaving, effects of plant growth on soil surfaces, rodent activity, and water erosion. Full re-grading and compacting of the safety areas may occur in the next 3-4 years, if necessary, in order to maintain compliance with the FAA.

2.5 HISTORY OF EFFORTS TO INCREASE PLANT COVER

The germination rate in the safety area was very poor during the 1999/2000 winter, the first winter following the completion of the grading and hydroseeding. As a consequence, there was very low plant cover one year after the initial safety area grading. The poor germination was due to a combination of several factors. One, the hydroseeding occurred early in the season (September 1999) and much of the mulch layer with seeds dried and was blown away prior to the winter rains in December 1999. Two, the rainfall in the 1999/2000 winter was below average and was insufficient to support successful germination. Three, the plant species used in the seeding mix may not have been the most suitable for the soil conditions in the infield, which began to exhibit high salinities within one year of construction.

To increase plant cover in the safety area, URS and S&S Seeds conducted a site visit in November 2000 to examine soil conditions and to make recommendations on a new seeding mix and method. Victor Schaff of S&S Seeds recommended that the Airport seed one infield area, as a test program, with the following non-native plants which have high tolerances to both dry and saline soil conditions.

Species	Growth Form (all perennials)	Seeding rate (lbs/acre)
<i>Achillea millefolium</i>	Herb	3
<i>Atriplex semibaccata</i>	Herb	3
<i>Puccinella distans</i>	Grass	3
<i>Sporobolus airoides</i>	Grass	3
<i>Elymus canadensis</i>	Grass	3
<i>Elymus junceous</i>	Grass	3
<i>Agropyron elongatum</i>	Grass	3
<i>Agropyron smithii</i>	Grass	3
<i>Camissonia cheiranthifolia</i>	Herb	3
Total		27

In Spring 2002, one infield area was used as a test plot and hydroseeded with the above mixture. The seeding occurred too late in the rainy season (in an otherwise dry year) and as a result, the seeds failed to germinate.

In Winter 2003, prior to attempting additional hydroseeding, Airport staff purchased a small quantity of seeds from each of the species listed in the table above and planted them in flats at the Airport Maintenance Yard using saline soil collected from the safety area and using overhead irrigation to germinate the seeds. Five species germinated and grew reasonably well. The remainder either did not germinate or exhibited poor germination rates. The five most successful species were (in order of highest to lowest germination): *Agropyron elongatum*, *Elymus canadensis*, *Elymus junceous*, *Agropyron smithii*, and *Puccinella distans*.

In Summer 2003, field test plots were planted in portions of the safety area with saline soils, using the above five species that were successful in the test flats. The test plots in the safety area were irrigated every other day to establish the seedlings. None of the species successfully germinated.

In February 2004, Airport staff, on the advice of staff from Parko Seeds, seeded new field test plots using a commercial "Seashore Passpallum" mix. The plots were irrigated to stimulate germination, but none occurred. Parko Seeds advised Airport staff that if this mix, which has been successful in other saline soil situations, did not germinate, they did not expect that other mixes would germinate well either.

3.0 EXISTING VEGETATION CONDITIONS IN THE SAFETY AREA

An aerial photograph of the safety area in 1996, three years prior to the initial grading, is presented in Appendix E, Figure 4.

Aerial photographs of the safety area in February 2003, September 2003, September 2004, and November 2006 are provided on Figures 6, 7, and 8 of Appendix E and on Figure 3 of this report, respectively. The photographs show that most of the infield areas contain a relatively dense and continuous plant cover. The dominant plants in these areas include: Italian ryegrass, Bermuda grass, saltgrass, Mediterranean barley, plantain, cheeseweed, beet, bur clover, and sweetclover. With the exception of Italian ryegrass and saltgrass, these are non-native upland species (Table 1). Italian ryegrass is considered a "FAC" or facultative wetland plant – that is, 50 percent of the time it occurs in wetland areas and 50 percent of the time it occurs in upland areas. The "FAC" designation is sufficient to consider this a wetland plant when applying the CCC wetland definition. Saltgrass is a native "FACW" or facultative wetland plant that grows in a wide range of conditions from very wet to mostly dry and from saline to non-saline soils.

As shown on Figure 3 and Appendix E, Figures 6-8, several infield areas are barren or contain patches of low plant cover. The margins of these areas contain the following plants, all of which are adapted to high saline conditions: alkali weed (*Cressa truxillensis ssp. truxillensis*), saltmarsh sandspurry, pickleweed, saltgrass, sickle grass, and horned sea-blite (*Suaeda calceoliformis*). All but the sickle grass are native species. A CNPS 1B listed plant, Southern tarplant (*Hemizonia parryi ssp. australis*), has also been observed scattered with only a few individuals in the infield areas. During a site survey conducted on March 1, 2007, approximately 20-30% of the safety area contained these barren or sparsely vegetated areas, which is the same as reported in 2005 (see Appendix B). The new safety areas associated with Taxiway M were drill seeded and the area has become well established with similar dominant species to other safety areas. There are fewer saltflats in this area than other infield areas (see Appendix B).

In September 2004, URS conducted a soil salinity survey throughout the safety area to determine if the areas of low plant cover contained higher salinities. The locations of the soil samples are shown in Appendix E, Figure 8. The results were similar to those from the soil survey of the safety area in the 1996 wetland delineation report (Woodward-Clyde Consultants, 1996). The salinities in the barren and sparsely vegetated areas were substantially higher than in the adjacent areas with the dense upland species (see Table 2). Only plants that are adapted to high salinities occur in these areas.

The location and shape of the high salinity patches in the safety area at the present time are very similar to that observed in 1996 (see Appendix E, Figure 4), despite the removal of 12,500 cubic yards of saline soil from the infield areas in 1999. The Airport expected that the removal of the saline soils and the replacement with imported upland soils would facilitate the establishment of upland plants in the safety area in a continuous and dense cover. One of the objectives of the Safety Area Grading Project was to replace the high salinity areas containing wetland-associated plants with upland species. This objective was not accomplished as the high salinity soil areas have persisted.

TABLE 1
COMMON PLANT SPECIES IN THE SAFETY AREA

Dominant Species		Growth Form	Wetland Status	Exotic or Native	Location
Scientific Name	Common Name				
<i>Ambrosia psilostachya</i> var. <i>californica</i>	Western ragweed	BH	FAC	N	NSF
<i>Atriplex leucophylla</i>	Whiteleaf	PH	FAC*	N	SF
<i>Atriplex patula</i> ssp. <i>patula</i>	Fat hen	AH	FACW	N	NSF
<i>Atriplex semibaccata</i> *	Australian saltbush	PH	FAC	E	SF, NSF
<i>Atriplex suberecta</i>	Saltbush	AH		E	SF, NSF
<i>Beta vulgaris</i> *	Beet	AH	FACU	E	NSF
<i>Cressa truxillensis</i> var. <i>truxillensis</i>	Spreading alkali-weed	PH	FACW	N	SF, NSF
<i>Cynodon dactylon</i>	Bermuda grass	PG	FAC	E	SF, NSF
<i>Distichlis spicata</i>	Saltgrass	PG	FACW	N	SF, NSF
<i>Erodium cicutarium</i> *	Red-stem filaree	AH		E	NSF, M
<i>Hemizonia parryi</i> ssp. <i>australis</i>	Southern tarplant	AH	FAC	N	SF
<i>Hordeum brachyantherum</i>	Meadow barley	PG	FACW	N	NSF
<i>Hordeum marinum</i> ssp. <i>gussoneanum</i>	Mediterranean barley	AG	NI	E	NSF
<i>Lactuca serriola</i>	Prickly wild lettuce	AH	FAC	E	NSF, M
<i>Lepidium nitidum</i>	Peppergrass	AH		N	SF, NSF
<i>Lolium multiflorum</i>	Italian ryegrass	AG	FAC*	E	NSF, M
<i>Malva parviflora</i> *	Cheeseweed	AH		E	M
<i>Malvella leprosa</i>	Alkali-mallow	PH	FAC	N	SF
<i>Medicago polymorpha</i>	Bur clover	AH		E	NSF
<i>Melilotus alba</i>	White sweetclover	A/BH	FACU+	N	NSF, M
<i>Melilotus indica</i>	Sourclover	A/BH	FAC	E	NSF, M
<i>Mesembryanthemum nodiflorum</i> *	Slender leaf iceplant	AH	FACU	E	SF
<i>Parapholis incurva</i> *	European sickle-grass	AG	OBL	E	SF, NSF
<i>Picris echioides</i>	Bristly ox-tongue	AH	FAC*	E	NSF, M
<i>Piptatherum miliaceum</i>	Smilo grass	PG	(FACU-)	E	M
<i>Plantago lanceolata</i>	Narrowleaf plantain	PH	FAC-	E	NSF, M
<i>Polygonum arenastrum</i> *	Common knotweed	AH	FAC	E	NSF, M
<i>Rumex crispus</i>	Curly dock	PH	FACW-	E	NSF
<i>Salicornia virginica</i>	Virginia pickleweed	S	OBL	N	SF
<i>Sonchus asper</i> *	Prickly sow-thistle	AH	FAC	E	NSF, M
<i>Sonchus oleraceus</i>	Common sow-thistle	AH	NI*	E	NSF, M
<i>Spergularia manna</i>	Saltmarsh sandspurry	AH	OBL	N	SF
<i>Suaeda calceoliformis</i>	Horned sea-blight	AH	FACW+	N	SF
<i>Taraxacum officinale</i>	Dandelion	AH	FACU	E	NSF, M

Note: Species observed during the 2007 survey that were added to the 2005 species list are identified in bold.

Location definitions: SF= Salt flats. NSF= Non-salt flats. M= Higher concentration along margins of runway.

Scientific nomenclature follows Hickman (1993) and Skinner and Pavlik (1994).

****) indicates non-native species that have become naturalized or persist without cultivation.*

"#" indicates the wetland status was used from the 1996 USFWS wetland plant list.
Habit definitions: AG = annual grass. AH = annual herb. PG = perennial grass. PH = perennial herb.
Wetland indicator status (Reed 1988), as updated by USFWS in 1996:
OBL = obligate wetland species, occurs almost always in wetlands (>99% probability)
FACW = facultative wetland species, usually found in wetlands (67-99% probability).
FAC = facultative species, equally likely to occur in wetlands or nonwetlands (34-67% probability).
FACU = facultative upland species, usually occur in nonwetlands (67-99% probability).
+ or - symbols are modifiers that indicate greater or lesser affinity for wetland habitats.
NI = no indicator has been assigned due to a lack of information to determine indicator status.
* = a tentative assignment to that indicator status by Reed (1988).
A blank indicates upland species

**TABLE 2
SOIL SALINITY DATA FROM SAFETY AREA - 2004**

Infield Area (see Appendix E, Figure 8)	Soil Salinity (parts per thousand)		
	Barren Areas	Sparsely Vegetated Areas	Soil Salinities in Densely Vegetated Areas
"O" (east end)	Surface: 8.5 At 3" depth: 4.6	Surface: 21.2 At 3" depth: 2.7	Surface: 0.2 At 3" depth: 1.3
"O" (west end)	At 3" depth: 26.8	At 3" depth: 3.9	At 3" depth: 0.6
"B"	Surface: 20.2 At 3" depth: 9.5	Surface: 8.6 At 3" depth: 6.9	Surface: 1.3 At 3" depth: 1.1

As noted earlier, most of the airfield is comprised of fill placed by the Marines in the 1940s, and that much of the fill material was derived from tidal areas. It appears that salts in these underlying soils have moved through capillary action to the soil surface over time due the high evapo-transpiration in the safety area. Hence, removal of the upper 6 inches of saline soils in 1999 did not remove the source of the salts, which is located in the lower soil profile. Soon after completion of the safety areas grading, the upward movement of salts began again, creating the high salinity soils that are barren or vegetated with wetland-associated plants. If this hypothesis is accurate, the existing high salinity soil areas will persist indefinitely as the fill soils in the airfield are 3 to 5 feet deep.

4.0 ISSUES TO RESOLVE

The Airport is currently maintaining the safety area under the City's 10-year CDP that expires in April 2007. The Coastal Commission CDP does not have an expiration date. Under the CDPs, the Airport will continue to mow the safety area on an as-needed basis. The Airport plans to do some minor earthwork to smooth some uneven surfaces in the safety area in the next couple years, and may need to re-grade and re-compact most of the safety area in the next 3-4 years to remove uneven surfaces and to meet FAA requirements.

The Airport will apply for a renewal of the City CDP in March 2007. The Airport will request that the renewed CDP allow the Airport to continue to maintain the safety areas - including the new safety and maintenance areas created under the ASP (Taxiway M, Taxiway A, new RSA, and glideslope) - in the same manner under a single permit. In addition, the Airport will request that impacts to any wetland-associated plants (i.e., the halophytic plants in the high saline areas) would not require mitigation because such mitigation was accomplished under the first CDP in 1999 and 2000, and for new safety areas and associated creek relocation most of the mitigation was implemented from 2005 to 2007 and the remaining mitigation will be implemented in the near future.

The City staff report for the Safety Area Grading Project in 1997 stated "A primary concern of the Airport focuses around the potential re-establishment of wetlands within the infield areas. It is not staff's intent that the Airport be required to "re-mitigate" the loss of wetlands that would result from maintenance. It should also be pointed out that it is not the Airport's intent to allow wetlands to re-establish."

The Airport believes that it is infeasible to successfully replace the halophytic plants in the safety area with non-native plants that are not also considered wetland-associated plants. The overriding effect of the high soil salinities will likely result in sparse plant cover in portions of the safety area that can only be vegetated with native halophytic plants. Because these salt tolerant plants are also considered wetland plants, the Airport is concerned that additional mitigation could be required in the future as these plants are subject to removal from re-grading and re-compacting. The Airport believes that no additional mitigation is required because impacts to these wetland-associated plants have been completely mitigated. The Airport obtained concurrence from CCC staff that future impacts to wetland-associated plants in the safety area have been fully mitigated and that there is no need for additional mitigation, thereby allowing the Airport to use wetland-associated plants in the safety area for vegetative cover (see Appendix D).

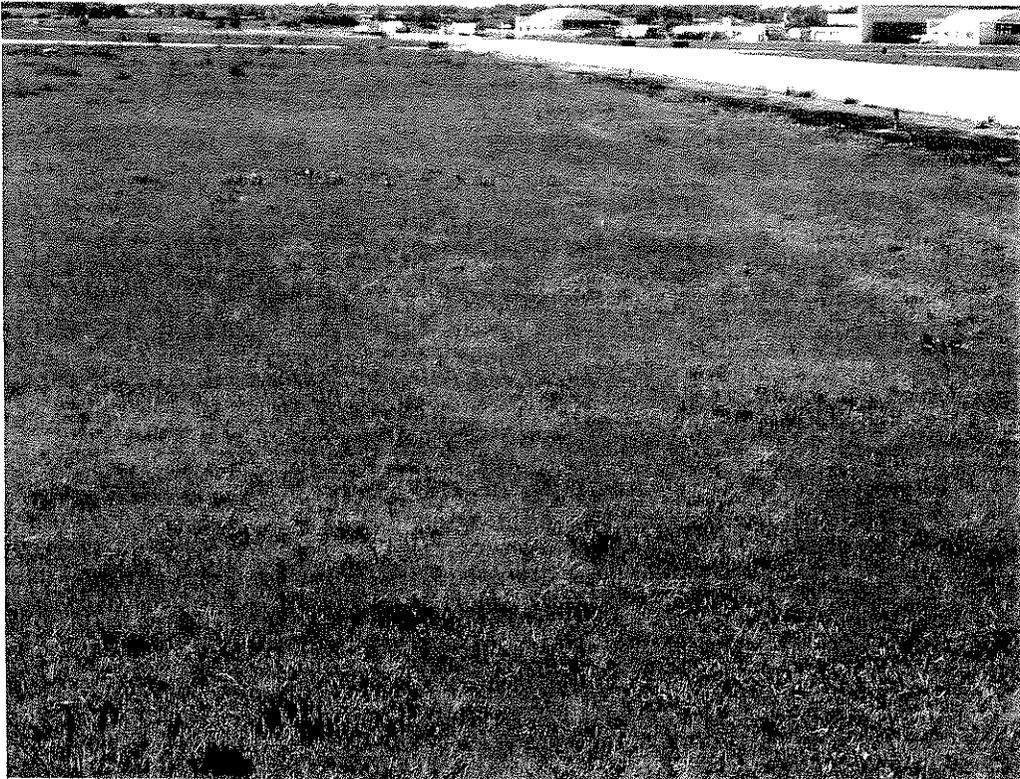
It is unlikely that the wetland-associated plants in the safety area will ever be completely removed and replaced with non-native upland plants as demonstrated by the Airport's experience over the past seven years. Hence, the native halophytic plants represent the best option for plant cover in the high saline areas. Native halophytic plants in the safety area are beneficial for both the functions of the safety area and the ecological conditions of the nearby Goleta Slough for the following reasons. One, the native halophytic plants provide the only plant cover in these areas; hence, allowing them to remain, and possibly increasing their extent by reseeding with the same species will accomplish one of the objectives of the Safety Area Grading project - continuous plant cover to reduce wind and water erosion. Two, the presence of these native halophytic plants in the safety area, even when

mowed, provides a seed source that can be used by the Airport for future restoration projects, and also for natural seed dispersal to Goleta Slough.

5.0 REFERENCES

Woodward-Clyde Consultants, 1996. Inventory of Wetlands and Other Native Habitats, Santa Barbara Airport.

Woodward-Clyde Consultants, 1997. Revised Wetland Mitigation Plan, Safety Area Grading Project, Santa Barbara Airport.



Photograph 1. View of safety area facing west south of Runway 7-25 in March 2007. Note dominance of Italian ryegrass.



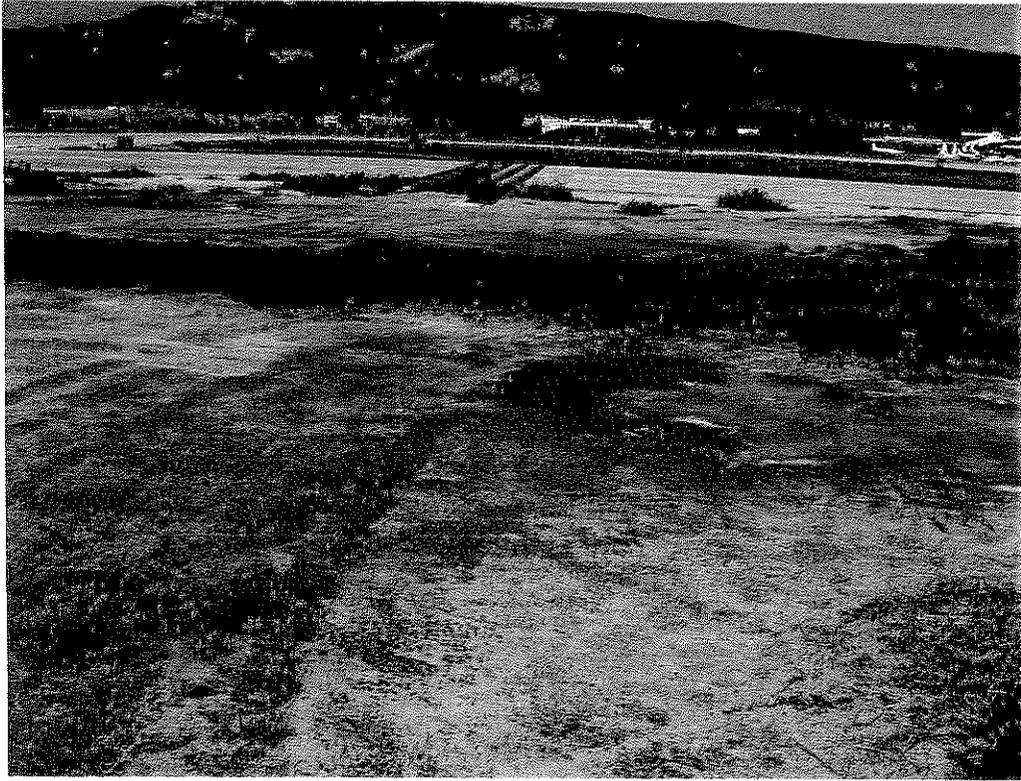
Photograph 2. Saline soils in safety area dominated by salt tolerant species such as sea-blite, alkali weed, and saltgrass.



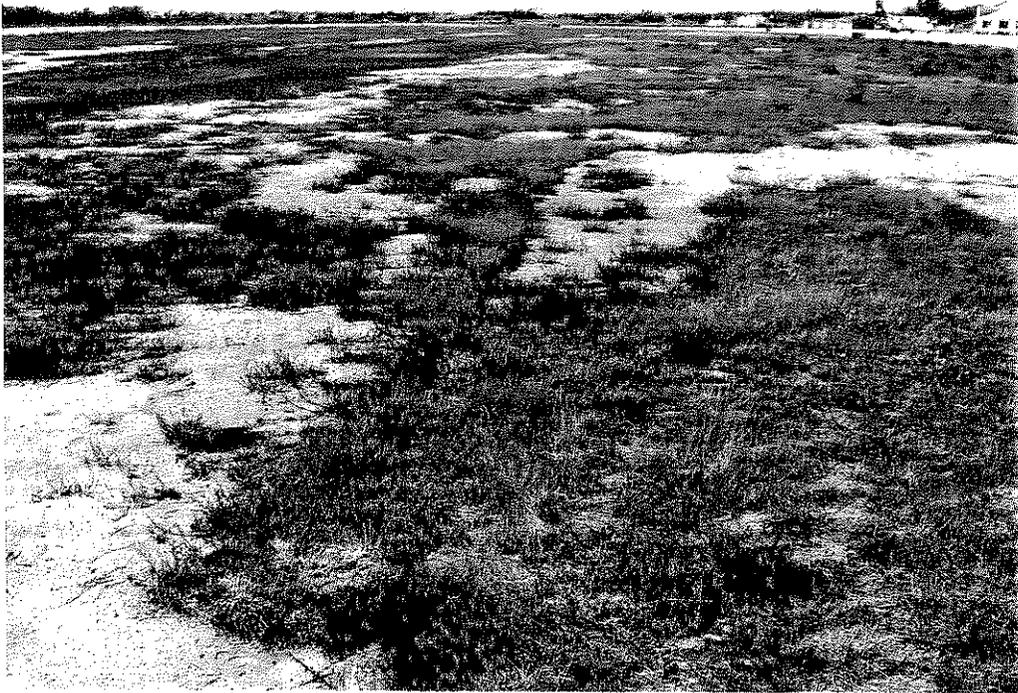
Photograph 3. Safety area facing west just south of Runway 7-25 showing scattered saltflats with surrounding areas dominated by Italian ryegrass, saltgrass, and scattered weeds.



Photograph 4. View of safety area facing southwest showing small scattered saltflats.



Photograph 5. View showing large saltflats with minimal vegetation in the safety area.



Photograph 6. View of large saltflats with some salt tolerant vegetation established.



Photograph 7. View of large saltflat areas with salt tolerant vegetation.



Photograph 8. View facing east from the north side of Taxiway A showing a mix of native and non-native salt tolerant species. The few grasses shown are non-native species that germinated from seeding efforts.



Photograph 9. View facing south in new safety area east of Taxiway M showing some vegetation that has germinated from drill seeding after construction.



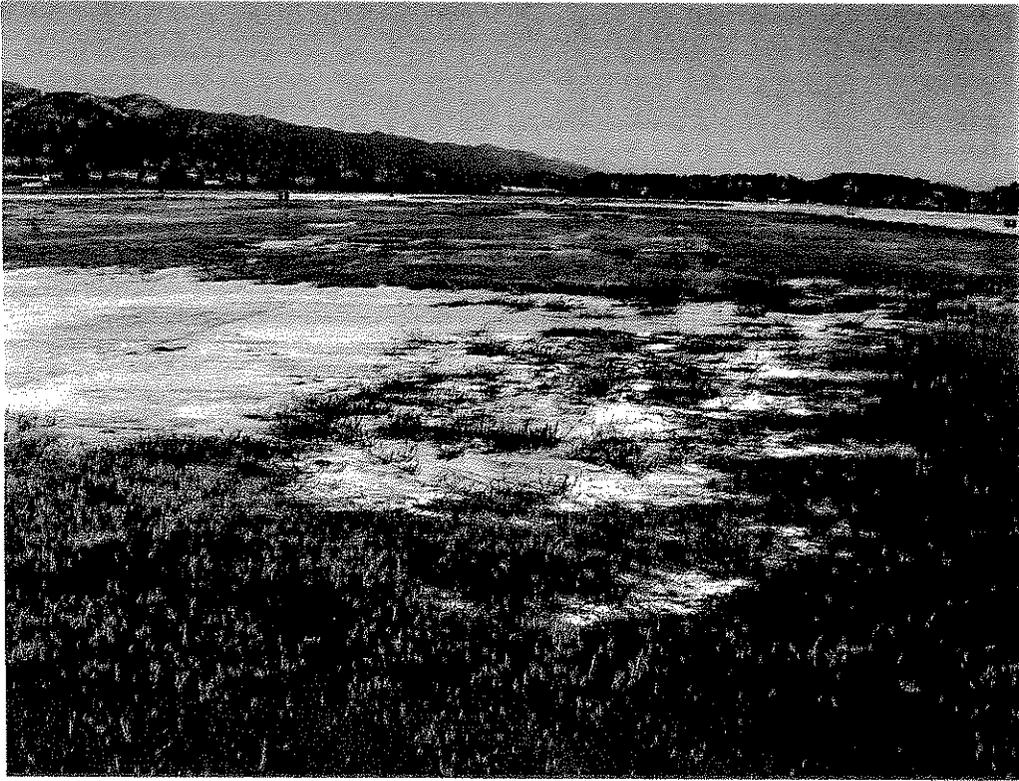
Photograph 10. Mix of saline and non-saline species in new safety area east of Taxiway M.



Photograph 11. Safety area east of Taxiway B showing weed dominated areas on edge of taxiway.



Photograph 12. View of safety area facing northwest from Taxiway B towards Runway 33R.



Photograph 13. Safety area facing east from the south side of Runway 7-25 showing saltflats and surrounding areas dominated by Italian ryegrass and saltgrass.

Exhibit: G

Summary of Maintenance Activities in the Runway Safety Areas

Santa Barbara Airport

March 2007

The safety area grading project was completed in December 1999. Grading of infield was completed by September 1999. The infield areas were hydromulched in September 1999 using the following seed mix (per construction specs):

Hordeum brachyantherum @ 20 lbs./acre

Festuca megalura, "Zorro" @ 20 lbs./acre

Plantago insularis @ 40 lbs./acre

Fiber mulch was applied at a rate of 1,500 lbs./acre. A polymeric emulsion soil stabilizing agent consisting of a minimum of 45% solids by weight with at least 90% by weight of these solids acrylic (Soil Seal Concentrate as supplied by Soil Stabilization Products Company or equivalent) was called out in the specs to be applied at a rate of 125 gallons per acre.

It was assumed that poor germination resulted due to a dry rainy season in the winter of 1999-2000.

November 2000 – John Gray of URS, based on conversations with Victor Schaff of S&S Seeds, recommended plants to include in a pilot program for re-seeding the infield area with the objective of achieving greater plant cover. The recommended species were as follows:

Species	Growth Form (all perennials)	Seeding rate (lbs./acre)
<i>Achillea millefolium</i>	Herb	3
<i>Atriplex semibaccata</i>	Herb	3
<i>Puccinella distans</i>	Grass	3
<i>Sporobolus airoides</i>	Grass	3
<i>Elymus canadensis</i>	Grass	3
<i>Elymus junceous</i>	Grass	3
<i>Agropyron elongatum</i>	Grass	3
<i>Agropyron smithii</i>	Grass	3
<i>Camissonia cheiranthifolia</i>	Herb	3
Total		27

In Spring 2002, one infield island was used as a test plot and hydroseeded with the above mixture. It was assumed that the hydroseeding occurred too late in the rainy season (in an otherwise dry year) and as a result, the seeds failed to germinate.

In Winter 2003, prior to attempting additional hydroseeding, Airport Staff purchased a small quantity of seeds from each of the species listed in the table above and planted test flats at the Airport Maintenance Yard using soil collected from the infield area and using overhead irrigation to germinate the seeds. Five species grew reasonably well, the remainder either did not germinate or germinated poorly. The five most successful species were (in order of highest to lowest germination): *Agropyron elongatum*, *Elymus Canadensis*, *Elymus junceous*, *Agropyron smithii*, *Puccinella distans*.

May 2003 – Anne Wells of URS calculates the percent vegetative cover of the infield using February 2003 aerial photography. Anne estimates 68% of the area has vegetative cover and 32% is barren. This calculation includes areas intentionally maintained as barren and weed-free along the edges of runways and taxiways by Airport Staff and therefore may underestimate the actual percent cover in the infield.

In Summer 2003, field test plots were planted in the infield using the five species that were successful in the test plots. The plots were irrigated every other day to establish the seedlings. None of the species successfully germinated.

In February 2004, Airport Staff on the advice of staff from Parko Seeds planted new field test plots using Seashore Passpallum mix and irrigation was provided. No germination resulted. Staff of Parko Seeds advised Airport Staff that if this mix (which has been successful in other saline soil situations) did not germinate, they did not expect that other mixes would germinate well either.

Other approaches suggested by Parko that have not yet been tried include using coatings on seeds to preserve them until wetter rain years, or starting plants in flats and then planting in the infield once plants are started.

In September 2004, URS conducted a soil salinity survey throughout the safety area to determine of the areas of low plant cover contained higher salinities. The results were similar to those from the soil survey of the safety area in the 1996 wetland delineation report. The salinities in the barren and sparsely vegetated areas were substantially higher than in the adjacent areas with the dense upland species. Only plants that are adapted to high salinities occur in these areas.

The Airport had expected that the removal of the saline soils and the replacement with imported upland soils would facilitate the establishment of upland plants in the safety area in a continuous and dense cover. When this did not occur, the Airport began consultation with John Gray of URS and Coastal Commission staff to discuss the need to mow and grade in areas with wetland plants without mitigating.

In June of 2005, the Coastal Commission agreed that maintenance of the site with wetland plants is appropriate. Regular mowing and occasional weed spraying have continued through March 2007.

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST AREA
89 SOUTH CALIFORNIA ST., SUITE 200
VENTURA, CA 93001
(805) 585-1800



July 28, 2005

Jan Hubbell
Senior Planner
Community Development
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102-1990

Re: Santa Barbara Airport Safety Area Grading (CDP97-0020 and CDP 4-97-134)

Dear Ms. Hubbell,

As you are aware, in June 1997 the City of Santa Barbara Planning Commission approved CDP97-0020 to regrade and recompact runway and taxiway safety areas at the Santa Barbara Airport. This Safety Area Grading Project included permanent impacts to 22.94 acres of wetlands, as defined by the Coastal Commission, and 1.69 acres of wetlands as defined by the Army Corps of Engineers. In order to mitigate the loss of these wetlands, the Airport proposed restoration of approximately 30 acres of transitional wetlands in Goleta Slough. The City approved this restoration in CDP97-0020 and the Coastal Commission further approved that portion of the project in their area of retained jurisdiction in 1997 as CDP 4-97-134. Both permits required two years of maintenance and five years of monitoring following the maintenance period for all of the wetland mitigation sites.

Following these approvals, the Safety Area Grading Project commenced in late 1999. The Airport has completed two years of maintenance and three years of monitoring of the wetland restoration sites. Recent monitoring reports submitted to the Commission by the Airport's biological consultant, URS, show that the restoration sites have been successfully achieving all relevant performance criteria.

Laurie Owens of the City of Santa Barbara Airport has recently informed Commission staff that the Airport intends on submitting an application for renewal of the local Coastal Development Permit for continuation of maintenance grading in the runway and safety areas. It is our understanding that the Airport will request that the renewed CDP allow the Airport to continue to maintain the safety areas in the same manner as previously approved by CDP97-0020 and will not include any new impacts to wetland or sensitive habitat areas. The Airport has also informed us that wetland plant species have naturally revegetated portions of the area originally approved for grading and maintenance. Given that the Airport has been previously approved to permanently impact the Safety Area

Grading sites and is diligently pursuing the wetland restoration required by the City and Coastal Commission for the permanent loss of these wetlands, Commission staff assume that no further wetland replacement mitigation will be required for the continued grading and maintenance at the previously approved Safety Area Grading Project sites. This assumes, of course, that the wetland restoration that is ongoing for the project continues to meet the monitoring requirements outlined in CDP 4-97-134 and CDP97-0020.

If this will not be the case, or if the proposed renewal application is not as we described, please let us know. Please also keep us informed as to any developments concerning the project. I can be reached at 805-585-1800 or mhetrick@coastal.ca.gov if you would like to discuss these issues.

Sincerely,



Melissa Hetrick
Coastal Program Analyst

Cc: Laurie Owens, City of Santa Barbara Airport
Gary Timm, California Coastal Commission
Steve Hudson, California Coastal Commission

RELEVANT POLICIES

Environmental Review

California Environmental Quality Act Guidelines

Section 15162:

“(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

“(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

“(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

“(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

“(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

“(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

“(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

“(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

Section 15164(a):

“The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.”

Environmentally Sensitive Habitat

Local Coastal Plan - Airport and Goleta Slough

Policy C-9:

“Any development approved within or adjacent to the wetland areas identified on the habitat map shall have been found to be consistent with PRC’s 30233, 30230, 30231 and 30607.1...”

California Coastal Act

Section 30230:

“Marine resources shall be maintained enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.”

Section 30231:

“The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects...”

Section 30233:

“The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

(4) Incidental public service purposes, including but not limited to burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.”

Section 30607.1:

“Where any dike and fill development is permitted in wetlands in conformity with Section 30233 or other applicable policies set forth in this division, mitigation measures shall include, at a minimum, either acquisition of equivalent areas of equal or greater biological productivity or opening up equivalent areas to tidal action...”

Hazards

California Coastal Act

Section 30253:

“New development shall: (1) Minimize risks to life and property in areas of high geologic, flood and fire hazard; (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the

construction of protective devices that would substantially alter natural landforms along bluffs and cliffs...”

City Local Coastal Plan

Flooding, Part I

“Encourage the use of permeable or pervious surfaces in all new development to minimize additional surface runoff.”

Cultural Resources

California Coastal Act

Section 30244:

“Where development would adversely impact archaeological or paleontologic resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.”

General Plan - Conservation Element

Policy 1.0:

“Activities and development which could damage or destroy archaeological, historic or architectural resources are to be avoided.”

Local Coastal Plan - Airport and Goleta Slough

Policy F-3:

“New development shall protect and preserve archaeological or other culturally sensitive resources from destruction, and shall minimize and, where feasible, avoid impacts to such resources. ‘Archaeological or other culturally sensitive resources’ include human remains, and archaeological, paleontological or historic resources.”

Visual Quality

California Coastal Act

Section 30251:

“The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local governments shall be subordinate to the character of the setting.”

City Local Coastal Plan

Policy 9.3:

“All new development in the coastal zone shall provide underground utilities and the undergrounding of existing overhead utilities shall be considered high priority.”

Local Coastal Plan - Airport and Goleta Slough

Policy E-1:

“Airport facility development shall reflect a high standard of development consistent with the character and quality of Santa Barbara.”

Policy G-1:

“Prior to approval of any development at the Airport by the Airport Commission, Architectural Board of Review, or other discretionary bodies of the City, a finding shall be made that adequate public service, including water, wastewater, traffic circulation, and parking are available to meet the needs generated by the proposed development.”

Development

California Coastal Act

Section 30250:

“New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels...”

Local Coastal Plan – Airport and Goleta Slough

Policy C-12:

“New development shall be sited and designed to protect water quality and minimize impacts to coastal waters by incorporating measures designed to ensure the following:

- Protect areas that provide important water quality benefits, that are necessary to maintain riparian and aquatic biota and/or that are particularly susceptible to erosion and sediment loss.
- Limit increases of impervious surfaces.
- Limit disturbance of natural drainage features and vegetation
- Minimize, to the maximum extent feasible, the introduction of pollutants that may result in significant impacts from site runoff from impervious areas. New development shall incorporate Best Management Practices (BMPs) or a combination of BMPs best suited to reduce pollutant loading to the maximum extent feasible.”