

CALIFORNIA COASTAL COMMISSION

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Commission Action:

**STAFF REPORT: REGULAR CALENDAR**

APPLICATION NO.: 4-03-082

APPLICANT: City of Santa Barbara Airport Department

PROJECT LOCATION: Santa Barbara Airport, 500 Fowler Road, Santa Barbara.

PROJECT DESCRIPTION: Implementation of Wetland Restoration Plan component of the Airfield Safety Projects including grading, restoration, creation, and enhancement of seasonal wetlands in Goleta Slough located within Coastal Commission area of retained permit jurisdiction in southern portion of Airport property.

LOCAL APPROVALS RECEIVED: City of Santa Barbara Coastal Development Permit and Goleta Slough Reserve (G-S-R) Coastal Development Permit for portion of Airfield Safety Projects located within Coastal Commission's Permanent Jurisdiction.

SUBSTANTIVE FILE DOCUMENTS: City of Santa Barbara Local Coastal Program; City of Santa Barbara Airport & Goleta Slough Coastal Plan, Component 9 (including amendments certified by the California Coastal Commission as of 5/03); City of Santa Barbara Planning Commission Resolution No. 030-03, June 19, 2003; City of Santa Barbara Planning Commission Staff Report, 6/12/03; Santa Barbara City Council Resolution No. 03-072, 7/15/03; City of Santa Barbara Council Agenda Report, 7/15/03; Notice of Final Action, City of Santa Barbara Coastal Development Permit, 7/16/03; Appeals From Coastal Permit, Decision of Local Government, City of Goleta, 7/30/03 & Santa Barbara Channelkeeper, 7/30/03; Draft Final Conceptual Wetland Mitigation Plan for Airfield Safety Projects, Santa Barbara Airport, 10/01; Wetland Restoration Plan for Airfield Safety Projects, 7/03; City of Santa Barbara Airport Department, Aviation Facilities Plan, Chapters 5 & 7, 3/03; California Coastal Commission, Findings on Consistency Determination CC-058-01, 6/10/02 (reflecting Commission Action of 4/9/02); California Coastal Commission, Staff Report & Findings, City of Santa Barbara LCP Amendment No. SBC-MAJ-1-02, Airfield Safety Projects, 11/21/02 (approved on 12/10/02); California Coastal Commission, Staff Report & Findings, Appeal No. A-4-SBC-03-077, 8/25/03 (NSI found on 9/10/03), Water Quality Management Plan for Airfield Safety Projects, 7/03; Stormwater Pollution Prevention Plan (SWPPP), Airfield Safety Projects, 7/03.

SUMMARY OF STAFF RECOMMENDATION

Staff recommends approval of the proposed projects with 8 special conditions. The City of Santa Barbara Airport Department proposes to carry out the Wetland Restoration Plan component of the Airfield Safety Projects including grading, restoration, creation, and enhancement of wetlands in Goleta Slough. The specific requirements of the Wetland Restoration Plan are specified in the City of Santa Barbara certified LCP Policy C-11 for the Airport and Goleta Slough Component. Compliance with Policy C-11 is required by special condition 5 attached to this permit. Pursuant to LCP Policy C-11 and special condition 5, the Wetland Restoration Plan is implemented by the October 2001 Draft Final Conceptual Wetland Mitigation Plan and the July 2003 Final Wetland Restoration Plan which updates the 2001 document. Special Conditions 6 and 7 to the subject permit require that the project, including the Wetland Restoration Plan, conform to the requirements of the Water Quality Management Plan (WQMP) dated July 2003 and the Construction Storm Water Pollution Prevention Plan (SWPPP) dated July 2003 in accordance with certified LCP policies C-12 – C-14. Special Condition 8 requires that special status plant and wildlife protection measures be implemented for all phases of the Airfield Safety Projects in accordance with certified LCP policies C-15 and C-16. The proposed Wetland Restoration Plan implements previous requirements of the Coastal Commission in its Federal Consistency Determination of April, 2002 and certification of LCP Amendment No. 1-02 for the Airfield Safety Projects. The Commission's approval actions on each were largely based on (1) the City's commitment to implement habitat mitigation and restoration at a 4:1 ratio for wetland habitat impacts, 2:1 for open water habitat impacts, and 1:1 for upland habitat impacts; and (2) the City's commitment to pursue the Goleta Slough Tidal Restoration Project. Both components are described in greater detail in the findings below.

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolution:

I. Approval with Conditions

The Commission hereby grants a permit, subject to the conditions below, for the proposed development on the grounds that the development, as conditioned, will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, will not prejudice the ability of the local governments having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3 of the Coastal Act and will not have any significant adverse effects on the environment within the meaning of the California Environmental Quality Act.

II. 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. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **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.
5. **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.

III. Special Conditions

1. Removal of Excess Grading Material.

Prior to issuance of the Coastal Development Permit, the applicant shall provide evidence to the Executive Director of the location of the disposal site for all excess excavated material and debris. Should the disposal site be located in the Coastal Zone, a Coastal Development Permit shall be required.

2. Other Required Agency Permits

Prior to issuance of Coastal Development Permit the applicant shall submit, for the review and approval of the Executive Director, evidence of final required approvals from the Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWCQB), and California Department of Fish and Game.

3. Mitigation Measures

All mitigation measures required in the Final Environmental Impact Report for the Airfield Safety Projects applicable to the proposed project are hereby incorporated by reference as special conditions of the subject permit unless specifically modified by any additional special conditions set forth herein.

4. Compliance with City of Santa Barbara Conditions of Approval

All conditions of approval contained in City Council Resolution No. 03-072 (attached) applicable to the proposed project are hereby incorporated as special conditions of the subject permit unless specifically modified by any additional special conditions set forth herein.

5. Wetland Restoration Plan

(a) In accordance with LCP (Airport and Goleta Slough) policy C-11, the Airfield Safety Projects shall not result in the permanent net loss of wetland or upland habitat. Wetland areas temporarily affected by construction activities shall be restored to pre-construction conditions. The required mitigation ratios for the estimated 13.99 acres of permanent wetland and 10.87 acres of permanent upland impacts associated with the Airfield Safety Projects shall be as follows:

- Seasonal Wetlands 4:1
- Creeks and open channels 2:1
- Uplands 1:1

(b) Approximately 37.2 acres of wetland mitigation shall be accomplished in accordance with the Airport's October 2001 draft final conceptual wetland mitigation plan (as updated by the July 2003 Final Wetland Restoration Plan) and April 2002 upland mitigation plan for the Airfield Safety Projects and subject to review and approval of the Final Wetland Restoration Plan by the California Department of Fish and Game.

(c) Prior to issuance of a Coastal Development Permit the City (as applicant) shall submit evidence of review and approval of final wetland and upland habitat mitigation, restoration, restoration, management, maintenance and monitoring plans by the California Department of Fish and Game. In accordance with LCP (Airport and Goleta Slough) policy C-11, the final mitigation plans shall include detailed descriptions of the mitigation sites and surrounding ecology, mitigation goals, objectives and performance standards, restoration and management actions including procedures and technical specifications for wetland and upland planting; methodology and specifications for removal of exotic species; soil engineering and soil amendment criteria; identification of plant species and density; maintenance requirements; monitoring methods, documentation requirements and submittal schedules for reviewing agencies; and performance criteria consistent with achieving the identified goals and objectives of mitigation; measures to be implemented if success criteria are not met; and long-term adaptive management of the restored areas for a period of not less than seven (7) years.

(d) The City shall implement all habitat mitigation and restoration requirements prior to or in concurrence with development of the Airfield Safety Projects to comply with the above identified mitigation ratios. With respect to wetland mitigation and tidal

restoration of Goleta Slough, the City shall implement all measures necessary to fulfill a 3:1 mitigation requirement for impacts to wetland habitat prior to or concurrent with development of the Airfield Safety Projects and shall continue to examine the feasibility of implementing tidal restoration as a means of meeting the full 4:1 wetland mitigation ratio requirement.

(e) Once there is authorization from the FAA to proceed with tidal restoration, and concurrence with the California Department of Fish and Game and the Goleta Slough Management Committee on the nature, scope and schedule of the tidal restoration projects following completion of the tidal restoration experiment, the City shall act as lead agency to develop and implement a Tidal Restoration Plan for at least 13.99 acres with participation from U.C. Santa Barbara, the California Department of Fish and Game, the Goleta Slough Management Committee and adjacent property owners. Should any participating agencies or property owners choose not to participate, or an agreement is not reached with all interested parties, the City shall continue to implement tidal restoration options to the maximum extent feasible unless the Commission or the FAA prohibit or deny tidal restoration.

(f) Within five (5) years of issuance of the Coastal Development Permit for the Airfield Safety Projects, the City shall present all documentation, findings and conclusions relative to the tidal restoration studies for review by the Commission. If the evidence demonstrates that tidal restoration is an infeasible means of satisfying the wetland mitigation requirements of the Airfield Safety Projects due to safety concerns, and/or the tidal restoration experiment or project is terminated at any point subsequent to implementation of an approved tidal restoration plan, the City shall immediately implement additional wetland mitigation measures to supplement mitigation efforts in full compliance with the 4:1 wetland mitigation requirements.

(g) If the results of the Goleta Slough Tidal Restoration/Bird Strike Experiment indicate that tidal restoration will not significantly and adversely increase the potential for aircraft bird strikes as determined by the FAA, the City shall provide 13.99 acres of the required wetland mitigation as part of a future, long-term project to restore tidal circulation to portions of Goleta Slough. In the event that tidal restoration mitigation is determined to be infeasible, the City shall provide 13.99 acres of in-kind mitigation for impacts to seasonal wetlands to complete the mitigation requirement. The additional 13.99 acres of wetland mitigation will fulfill the Airport's requirement for wetland mitigation for the Airfield Safety Projects. Priority shall be given to on-site mitigation for the additional 13.99 acres of wetland mitigation. Off-site mitigation measures shall only be approved should it not be feasible to fully mitigate impacts on-site. The City shall coordinate with the California Department of Fish and Game and the Goleta Slough Management Committee to identify potential off-site mitigation sites. Off-site mitigation measures shall be implemented in an area in close proximity to the project as is feasible, and shall not be located outside of Santa Barbara County.

6. Water Quality Management Plan

In accordance with all requirements of LCP (Airport and Goleta Slough) policies C-12 and C-13, the City shall comply with all provisions of the *Water Quality Management Plan (WQMP)* for the Airfield Safety Projects dated July 2003 during all construction phases of the Airfield Safety Projects including the Wetland Restoration Plan. Any wetland restoration activity, such as the removal of non-native vegetation, shall use non-chemical strategies where feasible. Where chemical strategies are determined to be necessary, they should be employed in a manner that minimizes or eliminates impacts to water quality and aquatic organisms. Prior to issuance of the Coastal Development Permit, the City shall submit evidence of the review and approval of the WQMP for the Airfield Safety Projects by the Regional Water Quality Control Board (RWQCB). Any substantial changes to the WQMP required by the RWQCB shall require an amendment to the Coastal Development Permit.

7. Construction Phase Erosion Control and Polluted Runoff Control Plans

In accordance with all requirements of LCP (Airport and Goleta Slough) policy C-14, the City shall comply with all provisions of the *Construction Storm Water Pollution Prevention Plan (SWPPP)* for the Airfield Safety Projects dated July 2003 during all construction phases of the Airfield Safety Projects including the Wetland Restoration Plan. Prior to issuance of the Coastal Development Permit, the City shall submit evidence of the review and approval of the SWPPP for the Airfield Safety Projects by the Regional Water Quality Control Board (RWQCB). Any substantial changes to the SWPPP required by the RWQCB shall require an amendment to the Coastal Development Permit.

8. Special Status Plant and Wildlife Protection Measures

In accordance with the requirements of LCP (Airport and Goleta Slough) Policies C-15 and C-16, special status plant and wildlife protection measures shall be implemented for all phases of construction of the Airfield Safety Projects that will potentially impact sensitive plant and wildlife species and/or that will result in disturbance or degradation of habitat areas that contribute to the viability of plant or wildlife species designated as rare, threatened or endangered under State or Federal law, including plant species designated as rare by the California Native Plant Society. With respect to the Airfield Safety Projects, all construction, *habitat mitigation and restoration plans*, and special status plant or wildlife mitigation and protection measures, shall, prior to commencement of construction, be reviewed and approved by the regulatory agencies having jurisdiction over the identified resource, including the California Department of Fish and Game, U.S. Fish and Wildlife Service, and the National Marine Fisheries Service, and shall at a minimum include:

- (a) Project timing and implementation schedules that describe timing, duration, methods, and staging areas for all construction operations and restoration plans. The project timing and implementation schedules shall include a submittal

schedule for implementation of proposed restoration plans and for all resource monitoring reports.

- (b) Prior to commencement of construction activities, surveys of the project area shall be conducted for special status wildlife species. Should the site survey identify special status wildlife species on or near the project site, a qualified biologist or resource specialist shall develop a plan to avoid or mitigate potential impacts to the sensitive species. Resource avoidance or mitigation plans shall be reviewed and approved by the regulatory agencies having jurisdiction over the identified resource and commencement of construction shall not proceed until such review and approval is granted.
- (c) Construction shall not occur during the nesting and breeding season from mid-March to the end of June, unless a qualified biologist and/or resource specialist and the California Department of Fish and Game, determine with certainty that construction activities will not adversely impact sensitive bird species. Special resource avoidance and management plans shall be implemented for Belding's savannah sparrow.
- (d) Construction activities related to the Tecolotito Creek realignment shall minimize extensive stream diversions during construction and shall minimize potential impacts to steelhead. Construction of the new creek channel shall be completed prior to connecting with the existing channel and final diversion of stream flow into the new creek channel shall be conducted only between July 15 and October 1 of any given year to avoid the migration period of steelhead.
- (e) Prior to commencement of construction activities, surveys of the project area shall be conducted for special status plant species. Potential impacts to sensitive plant species shall be fully mitigated and a qualified botanist or other resource specialist shall develop a plan to avoid or mitigate potential impacts to the sensitive species. Resource avoidance or mitigation plans shall include, but not be limited to, species-specific salvage or seed collection, salvage of topsoil, restoration of disturbed areas and establishment of new populations in suitable habitat areas. Mitigation, restoration, management, maintenance and monitoring plans to carry out the provisions of this special condition shall be developed by a qualified botanist and/or resource specialist and shall be reviewed and approved by the California Department of Fish and Game. Evidence of CDFG review and approval shall be submitted to the Executive Director of the Coastal Commission prior to commencement of construction.

IV. Findings and Declarations

The Commission hereby finds and declares:

A. Project Description and History

The proposed development consists of implementation of the Wetland Restoration Plan component of the Airfield Safety Projects for the Santa Barbara Airport including grading, restoration, creation, and enhancement of seasonal wetlands in Goleta Slough located within Coastal Commission area of retained permit jurisdiction in the southern

portion of Airport property. The Airfield Safety Projects consist of the construction of two 1,000 foot long runway safety areas (RSAs), the realignment and relocation of an existing runway (Runway 7-25) to accommodate new RSAs, a new taxiway (Taxiway M) approximately 2,600 feet in length, and lengthening of runway protection zones (RPZs) to meet current FAA design standards. The project also includes extension of a service road around the west end of the runway to provide maintenance and emergency vehicle access and a new 20-foot wide east service road. In addition, Tecolotito Creek will be relocated approximately 1,800 feet west of its present location and the confluence of Carneros Creek with Tecolotito Creek will be shifted to the west. The above described portions of the project are located within the City of Santa Barbara's permit jurisdiction and the Coastal Commission's appeal jurisdiction. The City's prior approval of the CDP for this portion of the project was appealed to the Commission by the City of Goleta. The Commission, at its September 2003 hearing, determined that the project, as approved by the City, was consistent with all applicable policies of the City's certified Local Coastal Program and that the appeal raised No Substantial Issue.

Although the subject permit and all attached special conditions are only applicable to that portion of the Airfield Safety Projects that lie within the Coastal Commission's area of retained permit jurisdiction as depicted by exhibits 1 & 2, as a practical matter the Airfield Safety Projects, including implementation of the Wetland Restoration Plan in Goleta Slough and upland areas, have been considered and approved as a single project in past Commission actions and approval of the project by the City of Santa Barbara. Upland mitigation areas, the majority of mitigation area R-2, and sections of creek berms associated with the Wetland Mitigation Plan are located entirely within the City's permit jurisdiction while all of mitigation area I, a small section of the southwestern corner of area R-2, and sections of creek berms along Tecolotito Creek in the southern portion of the property are located entirely within the Commission's permit jurisdiction (exhibit 5). In its approval of a CDP within its permit jurisdiction (and Commission appeal jurisdiction) the City considered the entire project as a whole, including wetland mitigation areas subject to Commission jurisdiction, and required compliance with numerous special conditions applicable to wetland mitigation requirements contained in the LCP (exhibit 3). Concurrently, many special conditions attached to the subject permit reference portions of the Airfield Safety Projects occurring both within the City's permit jurisdiction and the Commission's retained jurisdiction. Because of the overlapping relationship between the previously approved portions of the Airfield Safety Projects located within the City's permit jurisdiction and the Wetland Restoration Plan portion of the projects located within the Commission's permit jurisdiction the findings below largely address the entire project in order to provide the necessary clarity to the subject permit application and special conditions of approval.

The Airfield Safety Projects are proposed to improve operational safety at Santa Barbara Airport. The projects would not increase the capacity of the Airport's runways, or result in a change in the type of aircraft used at Santa Barbara Airport. The projects consist of the following components:

Runway Safety Areas: Runway Safety Areas (RSAs) provide protection to passengers and aircraft in the event of an accidental aircraft overrun or undershoot of a runway. The proposed project would lengthen the RSAs at both ends of Santa Barbara Airport's main runway (Runway 7-25) to meet current FAA design standards of 500 feet wide by 1000 feet long at each end. The existing RSA at the west end of Runway 7-25 is about 320 feet long, ending at Tecolotito Creek. At the east end, the existing RSA is 215 feet in length, terminating at San Pedro Creek and Fairview Avenue.

In order to attain the 1000-foot RSA length on the east end of the runway, 800 feet of the existing runway would be converted to an RSA and added to the 215 feet of RSA already provided. The 800 feet of runway length that would be converted to an RSA on the east end would be replaced on the west end, and a new 1000-foot RSA would be constructed on the west end of the runway. To accommodate the 800-foot runway relocation and the new 1,000-foot RSA on the west end, Tecolotito Creek would be relocated by approximately 1,800 feet to the west of its present location, and the confluence of Carneros Creek with Tecolotito Creek would also be shifted to the west. The 800-foot shift in the runway would also require extension of existing Taxiway A to the west by 800 feet and other taxiway modifications at the eastern end to accommodate the new Runway 25 location. The project also includes extension of a service road around the west end of the runway to provide maintenance and emergency vehicle access, relocation of a Southern California Gas Company main line, and relocation of lights, signs, and navigational aids on the airfield. The proposed project would not increase the Runway 7-25 length of 6,052 feet and would not increase the capacity of the runway or allow it to accommodate larger aircraft.

Taxiway M: To reduce the number of runway crossings and potential runway incursions, a new Taxiway M is proposed to provide a more direct route to the northwest ramp area from the Airport's parallel runways (Runways 15R-33L and 15L-33R). Taxiway M would be 50 feet wide with 20-foot wide paved shoulders and would parallel Runway 15R-33L to the west for 2,450 feet, extending approximately two-thirds the length of the runway, beginning at the northwest ramp and terminating at Taxiway E.

East Service Road Extension: A new 20-foot wide asphalt service road would be constructed around the active aircraft ramp at Ampersand for a distance of 1,600 feet to eliminate potential aircraft/vehicle conflicts.

All of the above portions of the project were approved by the City in the aforementioned CDP (and Commission NSI determination No. A-4-SBC-03-77). The portion of the project currently subject to Commission permit jurisdiction consists of the following:

Wetland Mitigation and Enhancement Plan:

The City of Santa Barbara Airport and Goleta Slough Local Coastal Plan describes Goleta Slough as an area of approximately 400 acres, of which 189 acres are classified as tidal marsh subject to tidal inundation through natural channels or culverts. Goleta

Slough is designated "Recreational Open Space" in the LCP. The Goleta Slough Reserve Zone, which coincides with the Goleta Slough Ecological Reserve, is located 50 feet from the westerly end of Runway 7-25. The wetland communities within the slough include open water, coastal salt marsh, salt flats, seasonal wetland meadows, riparian woodland, shrub-scrub thicket and transitional wetlands. The slough provides habitat to support a large resident bird population and serves as a resting and feeding site for migrating birds using the Pacific Coast flyway. Upland areas include 25 acres south of the main slough channel adjacent to the University of California Santa Barbara (UCSB) campus.

Several current and former rare or endangered species have been identified in the slough including the Light-footed clapper rail, California least tern, American peregrine falcon, California brown pelican, Belding's savannah sparrow, California Red-legged frog, Tidewater goby and Southern California steelhead trout. Portions of Tecolotito Creek that flow into the Goleta Slough ecosystem are considered Essential Fish Habitat (EFS) for the rex sole and starry flounder, which spend part of their life cycle in the tidally influenced portions of the creek.

The Final Wetland Restoration Plan dated July 2003 was developed in accordance with the requirement of LCP (Airport and Goleta Slough) Policy C-11. The mitigation plan consists of wetland restoration along the relocated creek channels and creation and enhancement of seasonal wetlands in Goleta Slough on berms adjacent to Tecolotito Creek and tidal salt marshes, in Area R-2 and in Area I located in the southern portion of the Airport property. Approximately 32.6 acres of seasonal wetlands would be restored, and relocation of Carneros and Tecolotito Creeks would result in a net increase of 9.4 acres of creek habitat. The Wetland Restoration Plan includes active management of restored areas for three years and a minimum of seven years of monitoring. All restoration mitigation will be carried out under the direction of a qualified wetlands biologist in accordance with LCP requirements (previously approved by the Commission). Other required mitigation components include upland mitigation and enlargement of two sediment basins on Tecolotito and Carneros Creeks near Hollister Avenue. Both components are located entirely within the City's permit jurisdiction. Total grading for all wetland and upland mitigation consists of 42,000 cubic yards of excavation. Grading for Area I, the largest component of wetland restoration located within the Commission's permit jurisdiction, consists of 16,000 cubic yards.

The Final Wetlands Restoration Plan, dated July 2003, concludes that the Airport Safety Projects would have a permanent impact on approximately 13.99 acres of wetlands and a temporary impact during construction on 2.25 acres of wetlands. This estimate is 0.69 acres greater than that estimated in the 2001 draft Wetland Mitigation Plan. In certifying LCP Amendment 1-02 to provide for development of the Airfield Safety Projects, the Commission required additional policies, including Policy C-11, which provides specific mitigation ratio requirements of 4:1 for impacts to seasonal wetlands, 2:1 for impacts to creeks and open channels, and 1:1 for impacts to upland habitat. The mitigation ratios required by LCP Policy C-11 have been applied to the Final Wetland Restoration Plan based on the revised acreage totals.

LCP Policy C-11 also requires the City to undertake a Goleta Slough Tidal Restoration experiment and present all documentation, findings, and conclusions relative to tidal restoration to the Coastal Commission within five years of issuance of the CDP for the Airfield Safety Projects. Should the evidence demonstrate that tidal restoration will not significantly and adversely increase the potential for aircraft bird strikes, Policy C-11 requires the City to provide additional wetland mitigation through a long-term project to restore tidal circulation to portions of Goleta Slough. If the evidence demonstrates that tidal restoration is infeasible, the City is required to provide additional in-kind seasonal wetland mitigation to meet the 4:1 mitigation requirement for wetland restoration in Goleta Slough. The tidal restoration experiment is currently in the design phase and an application to the Coastal Commission for a CDP is anticipated in the fall of 2003.

The LCP Amendment for the Airfield Safety Projects also included new policies C-12, C-13, and C-14 to protect water quality during construction and operation of all project components including wetland restoration. The subject application includes the submittal of a Water Quality Management Plan (WQMP) and a Stormwater Pollution Prevention Plan (SWPPP) in conformance with the LCP requirements. Mitigation measures include implementation of Best Management Practices (BMPs) to minimize erosion and sedimentation, a monitoring program, revegetation of disturbed areas, and grading limitations within the rainy season.

The Airfield Safety Projects also include public educational and recreational enhancements at the Goleta Slough. Trails, trail enhancements, and interpretive signs to be located within the upland portions of Wetland Restoration Area I will be consistent with wetland restoration activities proposed in the Wetland Restoration Plan for Area I.

Applications have been filed for an Army Corps of Engineers (ACOE) Clean Water Act Section 404 permit, Regional Water Quality Control Board (RWQCB) Clean Water Act Section 401 Water Quality Certification, and California Department of Fish and Game Section 1601 Streambed Alteration Agreement.

Project Background

As stated previously, the City Planning Commission approved a Goleta Slough Reserve Coastal Development Permit, subject to conditions, for the portion of the Airfield Safety Projects located in the appeal jurisdiction of the Coastal Commission on June 19, 2003. The Planning Commission's approval was subsequently appealed to the City Council by the City of Goleta. The City Council upheld the Planning Commission's decision and denied the appeal on July 15, 2003. In approving the projects, the Planning Commission and the City Council found that the projects, as conditioned, were in conformance with the applicable policies of the City's certified Local Coastal Program and Sections 30230, 30231, 30233, 30236, 30240, 30244, 30251, 30252, and 30253 of the Coastal Act as embodied in General Policy 1.1 of the LCP. Upon issuance of the Notice of Final Action by the City on July 16, 2003, the City's decision was appealed to the Coastal Commission by the City of Goleta and Santa Barbara Channelkeeper. Both

appeals contended that the Airfield Safety Projects were not consistent with Sections 30233, 30236, and 30240 of the Coastal Act adopted in General Policy 1.1 of the certified LCP. The Commission determined that the appeal raised No Substantial Issue relative to the project's consistency with the City's certified LCP at its September 2003 hearing.

In addition to the most recent action described above, the proposed Airfield Safety Projects have been acted on by the Coastal Commission on two prior occasions. On April 9, 2002, the Commission voted to concur with Federal Consistency Certification CC-058-01 for the Aviation Facilities Plan, which includes the proposed Airfield Safety Projects. On June 10, 2002, the Commission adopted findings of concurrence for the plan, including specific findings that the project is consistent with Coastal Act policies 30233, 30236, and 30240. The Commission's consistency determination was largely based on the City's commitment to implement habitat mitigation and restoration plans at a 4:1 ratio for wetland habitat impacts, 2:1 for open water habitat, and 1:1 for upland habitat impacts resulting from construction of the airfield safety projects. Additionally, the Commission's consistency determination addressed the City's commitment to diligently pursue the Goleta Slough Tidal Restoration Project as a means of providing approximately 13.30 acres of restored, tidally influenced basins in the Slough as a way of fulfilling the 4:1 mitigation requirement. On December 10, 2002, the Coastal Commission certified amendment No. SBC-MAJ-1-02 to the Airport and Goleta Slough Local Coastal Program with suggested modifications (subsequently accepted by the City Council on March 4, 2003). The amendment included text changes and land use and zoning designation map revisions necessary to carry out the proposed Airfield Safety Projects. The amendment incorporated Chapters 5 and 7 of the Draft Aviation Facilities Plan and included policy provisions for habitat protection and restoration, and monitoring requirements necessary to provide mitigation for wetland, stream, and upland habitat impacts associated with construction of the Airfield Safety Projects into the LCP. As certified, the amendment also included several new resource protection policies (C-11 through C-16) recommended by Commission staff that provide specific mitigation and restoration measures required for development of the Airfield Safety Projects. (Compliance with these measures as well as all other applicable LCP policies have been incorporated into the City's approval of the proposed projects.) The findings adopted by the Coastal Commission in certifying the LCP amendment specifically state that the LCP Amendment is consistent with Sections 30233, 30236, and 30240 of the Coastal Act. These findings are incorporated by reference into this staff recommendation.

B. Coastal Act Policy 30233

The proposed Airfield Safety Projects and the related Wetland Restoration Plan subject to this permit application raise the same Coastal Act issues relative to allowable use for wetland fill, selection of the least environmentally damaging alternative, and implementation of adequate mitigation to minimize adverse impacts on wetland habitat that the Commission addressed in its previous approvals of the related Federal Consistency Determination and Local Coastal Program Amendment discussed above.

Section 30233 of the Coastal Act states:

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:

- (1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial facilities.***
- (2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.***
- (3) In wetland areas only, entrance channels for new or expanded boating facilities; and in a degraded wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities, shall not exceed 25 percent of the degraded wetland.***
- (4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.***
- (5) 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.***
- (6) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.***
- (7) Restoration purposes.***
- (8) Nature study, aquaculture, or similar resource dependent activities.***

Wetlands are defined in Section 30121 of the Coastal Act as follows:

'Wetland' means lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens.

The Commission regulations provide a more explicit definition of wetlands. Section 13577(b) of Title 14 of the California Code of Regulations defines wetlands as follows:

Wetlands are lands where the water table is at, near or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and shall also include those types of wetlands where vegetation is lacking and soil is poorly

developed or absent as a result of frequent or drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salt or other substances in the substrate. Such wetlands can be recognized by the presence of surface water or saturated substrate at some time during each year and their location within, or adjacent to, vegetated wetlands or deep water habitats.

The above definition requires the presence of one of three common wetland attributes of hydrology, hydrophytic vegetation, or hydric soils. It should be noted that this definition is more inclusive than those of other agencies, such as Army Corps of Engineers, which requires a site to exhibit all three of those attributes to be considered a wetland. The City has previously submitted a wetland delineation in the *Draft Final Conceptual Wetland Mitigation Plan for the Airfield Safety Projects, Santa Barbara Airport, October 2001*, prepared by URS Corporation, which delineates wetland habitat consistent with the Coastal Commission's definition of wetlands in Section 13577(b) of Title 14 of the California Code of Regulations. The Final Wetland Restoration Plan dated July 2003 updates the 2001 draft Wetland Mitigation Plan. The airfield safety projects will result in wetland impacts in several locations of the Santa Barbara Airport property.

Goleta Slough

Goleta Slough is an estuary which is dominated by marine influences and supports an extensive salt marsh. Seven creeks drain southward from the Santa Ynez Mountains, discharging into the slough. Tidal circulation extends up each of the tributaries with the exception of La Vegas and Maria Ygnacio Creeks. The Goleta Slough ecosystem encompasses diverse wetland and habitat types. It supports species which are both resident and migrant that are regionally rare in coastal California, or locally rare in Santa Barbara County.

An estimated 279 bird species have been reported within the Slough, and of these, 121 species are water associated, and 158 species occur primarily in upland areas. The salt marsh vegetation and mudflats offer roosting and nesting areas and foraging habitat for several avian species. Sora and Virginia rail, several species of herons, and the state listed endangered Belding's savannah sparrow all feed in the dense pickleweed (*Salicornia virginica*) vegetation. Open mudflats provide roosting and resting areas for shorebirds and other migratory species.

Vegetation and habitat types in the slough include extensive wetland and upland areas. Wetlands include: estuarine, riverine, palustrine, intertidal estuarine and low intertidal mudflats. Upland vegetation classified as ruderal has colonized most of the upper surfaces of the artificial dikes and berms that line the slough's basins and creek channels. Scrub vegetation is scattered over many parts of the area. Coastal bluff scrub is common at the project area, and Coastal sage scrub vegetation occurs along the southern margin of Goleta Slough.

Within the airport property and elsewhere in the Goleta Slough Ecosystem, the extent of estuarine wetlands has been reduced by diking and filling. What remains is primarily

in the tidal floodplain of lower Tecolotito Creek, south of the airfield. Most of this area experiences limited tidal circulation because of inadequacies in the system of channels and culverts that connect the creek to the surrounding marsh. In the lower portions of Goleta Slough the mouth of the slough is tidally influenced and large mudflats are exposed at the lowest tides.

Tecolotito Creek

Tecolotito Creek is the second largest creek on the airport property. It enters the airport through a concrete culvert under Hollister Avenue, and traverses Goleta Slough through man-made channels for the first two thirds of its length, and then through a natural channel. The width of the creek ranges from 75-150 feet, with a depth of 10 to 20 feet.

Since the 1970's, beginning with construction of the airport, Tecolotito Creek has been excavated and channelized to convey floodwaters around the airfield. The effects of the constricted channel, and the relatively broad, level area of adjacent tidal marsh make this area extremely vulnerable to sedimentation during winter flooding. Floodwaters laden with sediment may spill over creek banks at the point of constriction, resulting in natural berm formation along the creek, and an elevation of the surrounding marsh plain.

Section 30233 of the Coastal Act sets forth strict limitations on uses allowable in wetlands. For analysis purposes, the limitations can be categorized into three tests:

1. The purpose of the project is limited to one of eight allowable uses
2. The project has no feasible less environmentally damaging alternative; and
3. Adequate mitigation measures to minimize the adverse impacts of the proposed project on habitat values have been provided.

Allowable Use for Fill

The first general limitation set forth by the above mentioned policies is that proposed wetland fill is allowable only for specific limited uses. The portion of the project related to the construction of the runway improvements entails both temporary and permanent fill in wetlands as defined under the Coastal Act, and therefore triggers the 3-part test under Section 30233(a) for projects involving wetland fill. Pursuant to the first of these tests, a project must qualify as one of the eight stated uses allowed under Section 30233(a). Since the other allowable uses clearly do not apply, the issue is whether the proposed project can be permitted under Section 30233(a)(5), which authorizes fill for: *"Incidental public service purposes, including but not limited to, burying cables, pipes or inspection of piers and maintenance of existing intake and outfall lines."*

In order to be for an "incidental public service purpose" a proposed fill project must satisfy two tests: 1) the project must have a "public service purpose," and 2) the purpose must be "incidental" within the meaning of that term as it is used in section 30233(a)(5). Because the project will be constructed by a public agency for the

purpose of providing transportation services to the public, the fill is for a public service purpose. Thus, the project satisfies the first test under section 30233(a)(5).

With respect to the second test, in 1981, the Commission adopted the "Statewide Interpretive Guidelines for Wetlands and Other Wet Environmentally Sensitive Habitat Areas" (hereinafter, the "Guidelines"). The guidelines analyze the allowable uses in wetlands under Section 30233 including the provision regarding "incidental public service purposes." The Guidelines state that fill is allowed for:

Incidental public service purposes which temporarily impact the resources of the area, which include, but are not limited to, burying cables and pipes, inspection of piers, and maintenance of existing intake and outfall lines (roads do not qualify).

The proposed improvements are strictly defined as safety measures to ensure the safe operation of aircraft. The project will not increase the existing capacity of runway and airport operations, and does not include a permanent roadway or runway expansion. While the location of the primary runway will be shifted to accommodate the Runway Safety Areas prescribed by the FAA, the primary runway length and width (6,052 feet by 150 feet) and the capacity of the runway as designed will not change. In approving Local Coastal Program Amendment 1-02, The Commission found that, as an incidental public service under Section 30233(a)(5), the airfield safety projects constitute an allowable use for the fill of wetlands, and therefore, the proposed Airfield Safety Projects meet the requirements of the first test of Section 30233(a)(5) of the Coastal Act. Thus, the Commission finds that the projects, as approved in the City's CDP, also meets these requirements.

The Commission notes that Section 30233(a)(7) of the Coastal Act allows fill or excavation within a wetland for *Restoration purposes*. The Commission finds that implementation of the proposed Wetland Restoration Plan in accordance LCP policy C-11 and the requirements of past Commission actions relative to the Airfield Safety Projects constitute an allowable use under the provisions of Section 30233 of the Coastal Act.

Alternatives Analysis

Section 30233 allows fill in a wetland only where there is no feasible less environmentally damaging alternative to the proposed project. Alternatives to the project as proposed must be considered prior to finding that a project satisfies this provision of Section 30233. The primary alternatives analyzed by the City of Santa Barbara have been: (1) The West Creek Realignment; (2) The West Creek Culvert; (3) Engineered Material Arresting System; and (4) The No Project Alternative. The difference between alternatives 1 and 2 involves how Tecolotito Creek is affected. The preferred alternative (West Creek Realignment Alternative) would realign the creek around the Runway Safety Areas. The culvert alternative is designed to place Tecolotito Creek in a closed culvert beneath the Runway Safety Area in lieu of rerouting it.

As it has previously found in the aforementioned Federal Consistency Determination and Local Coastal Program Amendment 1-02, as well as in appeal no. A-4-SBC-03-077 NSI determination, relative to the proposed Airfield Safety Projects, the Commission finds that the City of Santa Barbara has examined feasible alternatives and proposes the least environmentally damaging feasible alternative. Where wetlands in the project area contain environmentally sensitive habitat (the Southern California Steelhead and Belding's savannah sparrow), the City has modified the project to avoid adverse effects to these species. Given complex physiographic and biological features that encompass Goleta Slough, feasible alternatives that would further reduce adverse impacts are either not available or are more environmentally damaging.

Based on the alternatives analysis discussed above, the Commission finds that the proposed development of the airfield safety projects, west creek realignment alternative, will avoid significant wetland impacts to the maximum extent feasible, that the safety projects represent the least environmentally damaging feasible alternative, and that the safety projects are therefore consistent with the alternatives test of Section 30233(a) of the Coastal Act.

Adequate Mitigation

The third limitation imposed on projects proposing fill in a wetland set forth by Section 30233 of the Coastal Act requires that adequate mitigation measures to minimize adverse impacts of the proposed project on habitat values shall be provided. It is critical that proposed development projects in a wetland include a mitigation plan, which when enacted will result in no net loss of wetland area or function.

The City has delineated wetlands based on both the Coastal Act and the U.S. Army Corps of Engineers definitions, noting that the Coastal Act definition can be more inclusive than that contained in the Corps' manual. Using the broader Coastal Act definition, The City has determined the overall wetland fill would be 13.99 acres of permanent wetland fill (which will be mitigated on-site) and 2.25 acres of temporary wetland fill (which will be restored on-site). Mitigation ratios for impacts to wetlands will be 4:1, and mitigation ratios for creeks and open channels will be 2:1.

Impacts

The preferred alternative would result in permanent impacts to existing stream channel bed and banks. The project could result in some loss of functions and values if tidal action and stream flow through the upper portions of the estuary are disrupted, and if native wetland and contiguous upland buffer vegetation are not reestablished along new stream banks.

Impacts to upland habitats would result from the realignment of Tecolotito Creek, Taxiway M, construction of the Runway Safety Area at the western end of runway 7-25, and the abandonment of sections of Carneros and Tecolotito Creek. Permanent and

temporary impacts to grassland and coastal sage scrub communities (10.87 acres) that function as wetland buffer zones will also occur in the existing graded Runway Safety Area.

To compensate for the permanent loss of wetlands the CDP, as approved by the City, includes creation and restoration of seasonal wetlands and open water habitat similar to those affected by the project as part of the airfield safety projects. The City has submitted a *Draft Final Conceptual Wetland Mitigation Plan for the Airfield Safety Projects, Santa Barbara Airport, October 2001*, prepared by URS Corporation, as part of the proposed LCP amendment, which identifies and describes proposed mitigation sites for restoration of wetland and open water habitat as described below. The *Draft Final Conceptual Wetland Mitigation Plan for the Airfield Safety Projects* identifies habitat mitigation and restoration measures to meet an approximate 3:1 mitigation ratio for impacts to wetland habitat and a 2:1 mitigation ratio for impacts to open water habitat as discussed below. The *Final Wetland Restoration Plan, July 2003*, submitted with the subject permit application updates the Mitigation Plan and provides the same mitigation sites and ratios.

Open Water and Mudflats

The relocation of Tecolotito and Carneros Creeks will create 9.3 acres of channel containing open water and mudflat wetlands. The relocated creeks will have the same width and depth as the existing creek channels, and the banks will be stabilized with native shrubs to prevent erosion. The new creeks will have annual grassland buffers, identical to the current creeks, except the relocated creeks will be farther from the runway.

Wetland Restoration

Wetland restoration on slough berms encompassing 12.7 acres will include the removal of non-native species such as tree tobacco, Italian thistle, and poison hemlock. These non-native species (and their seed bank in the soil) will be removed from the tops and sides of the berms through a two-year series of "grow-kill" herbicide treatments. The tops of the berms will be treated to facilitate the establishment and long-term persistence of wetland species by increasing soil moisture conditions.

Shallow depressions (one inch in depth) would be graded on the tops of the berms. These depressions would increase percolation by rainfall and reduce runoff to Tecolotito Creek. The objective for the berm soils is to create soil saturation to within 6 inches of the surface for an average of 14 days or more. In the winter following the last treatment, the berms will be revegetated to create seasonal wet grassland using species such as alkali weed, saltgrass, alkali mallow, creeping rye-grass, meadow barley, western ragweed, alkali heath and saltbrush.

This weed removal and restoration of the berms would remove the single largest source of weed seeds in Goleta Slough and replace this with habitat similar to that being

affected by the Runway Safety Area extension. The new habitats will benefit the adjacent tidal marsh habitat by creating native plant cover and food sources for use by wildlife, particularly the federally listed Belding's savannah sparrow which nests in the pickleweed marsh and forages in nearby native grassland and scrub areas.

Wetland Creation and Enhancement in "Area I"

New seasonal wetlands will be created in upland portions of "Area I", a 25-acre site owned by the airport located between the UC Santa Barbara bluffs and Tecolotito Creek. This location is dominated by a complex mixture of annual grassland, coyote brush scrub, poison oak stands, scattered ornamental trees, eucalyptus groves, and weedy patches (pampas grass). The area contains several small isolated wetlands. Much of the site was originally an upland that was lowered to construct the airfields during the 1940's. Portions of the site are highly disturbed by weeds, piles of rubble and secondary soil deposits, and the presence of an abandoned brick incinerator. A large storm drain empties into the site conveying runoff from UC Santa Barbara.

Two existing wetland patches in the middle of Area I will be enhanced by removing non-native plants and planting additional wetland plants such as spikerush, net-sedge, toad rush, bulrush, and pickleweed. Upland habitats will be retained in continuous patches at the site to retain wildlife habitat and movement corridors. Eucalyptus trees, poison oak and an abandoned incinerator will be removed. A total of 9 acres of new seasonal wetlands will be created and 2.2 acres of existing seasonal wetlands will be enhanced at the 25-acre site, and it will be protected for habitat purposes. It is situated adjacent to the UC Santa Barbara bluffs where an upland habitat restoration project was completed several years ago that includes an educational trail.

The wetlands would provide some secondary functions such as flood reduction by capturing and detaining more of the runoff from UCSB that empties into Goleta Slough, and the use of the area for research and public education projects that will facilitate new non-consumptive recreational uses.¹

Area R-2

Adjacent to Tecolotito Creek, and south of runway 7/25, a small man made basin exists which contains non-tidal seasonal wetlands. After Tecolotito Creek is filled and re-routed in this location, the disturbed areas will be graded to match the elevation of Area R-2, which supports non-tidal wet grassland. These newly lowered areas will then be planted with pickleweed, alkali heath, alkali weed, sand spurrey, meadow barley and saltgrass, to create 2.2 acres of new seasonal wetlands.

¹ Draft Conceptual Wetland Mitigation Plan for the Airfield Safety Projects, URS Corporation (2001)

Enlarged Sediment Basins

Existing sediment basins will be enlarged along Tecolotito and Carneros Creeks during the process of relocating the creeks. The enlarged basins will be designed to capture greater amounts of sediment, minimizing deposits in tidal wetlands of Goleta Slough that have affected tidal circulation and the conversion of wetlands to non-native uplands.

Tidal Restoration

The CDP for the airfield safety projects, as approved by the City, includes adequate mitigation and restoration plans to provide for restoration of wetland habitat at a mitigation ratio of 3:1. In addition to proposed 3:1 wetland mitigation plans, the CDP for the project requires additional mitigation in the form of tidal restoration through implementation of the *Goleta Slough Tidal Restoration Project*, should it be determined that the proposed tidal restoration is feasible and will not present a bird strike hazard at the Airport. This project would potentially restore tidal circulation to approximately 25 acres of degraded salt marsh, and enhance 13 acres of transitional and upland habitat.

Bird use of wetlands in the area surrounding Goleta Slough is a concern to both the FAA and the City of Santa Barbara, due the hazards birds pose to aircraft. The FAA is generally opposed to increases in wetland acreage in the vicinity of airfields, regardless of the type of wetland and habitat.

The objective of the Goleta Slough Tidal Restoration Experiment is to obtain empirical data that can adequately address the FAA's concerns and resolve the bird-strike issue. The Feasibility Study for the restoration experiment calls for introducing muted tidal action to basin F in the slough and full tidal action to basin L. Tidal circulation would be restored by either cutting a hole in the berm or installing culverts through the berm. The two experimental basins along with two control basins would then be monitored for two to three years, with monitoring focused primarily on bird use. The Goleta Slough Tidal Restoration Project would entail restoration of tidal circulation to approximately 25 acres of degraded salt marsh in the western slough, on UCSB and Department of Fish and Game property, and enhancement of 13 acres of surrounding transitional and upland habitat.

As detailed in the City's LCP Policy C-11, if tidal restoration is determined to be an infeasible means of mitigation, the City of Santa Barbara is committed to providing an additional 13.99 acres of in-kind mitigation for anticipated wetland impacts to fulfill the 4:1 mitigation requirement. This requirement is incorporated into the permit approved by the City for the Airfield Safety Projects and the proposed project as well as by special condition 5 attached to this permit.

To address adverse impacts to wetland habitat resulting from the proposed safety projects the LCP, as amended, includes new policy language to require restoration of wetland and open water habitat similar to those habitat areas affected by the proposed

safety projects. Additionally, Policy C-11 includes measures to carry out the Goleta Slough Tidal Restoration/Bird Strike Experiment to determine the feasibility of restoring tidal circulation to portions of Goleta Slough as a means of providing additional mitigation for impacts to wetland habitat. The proposed mitigation policies will ensure that impacts to wetland habitat are mitigated at ratio of no less than 4:1, or 3:1 of mitigated in-kind habitat in conjunction with a final approved tidal restoration plan. The proposed mitigation policies further require that permanently impacted open water creek habitat will be mitigated at a ratio of no less than 2:1, and that mitigation plans include a detailed description of mitigation sites, a description of goals and objectives, maintenance and monitoring methods, documentation requirements, and performance criteria to determine the success of mitigation efforts. As stated, compliance with all requirements of Policy C-11 is required by the City's approved CDP and by special condition 5 of this permit.

Policy C-11 and special condition 5 also requires that final habitat mitigation and restoration plans be reviewed and approved by an appropriate biologist/resource specialist and the California Department of Fish and Game, and that the plans consists of adequate technical specifications relative to identified mitigation sites, implementation schedules, restoration procedures, performance standards and goals, and for long-term adaptive management of restored habitat areas. Policy C-11 also requires that implementation of the City's proposed habitat mitigation and restoration plans occurs either prior to or in conjunction with development of the airfield safety projects. The policy will ensure that habitat mitigation and restoration will be implemented pursuant to a detailed and thorough restoration plan, with adequate mitigation ratios, and in a timely manner to ensure that adverse impacts to wetland habitat areas are minimized to the maximum extent feasible, consistent with the requirements of Section 30233 of the Coastal Act.

In addition, policy C-11 and special condition 5 will ensure that the City carries out its commitment to assess the feasibility of implementing tidal restoration. Required mitigation measures include provisions for the immediate implementation of wetland restoration plans at a ratio of 3:1 prior to or in conjunction with construction while the City continues to examine the possibility of restoring tidal circulation to portions of Goleta Slough. Mitigation requirements further specify the City shall report to the Coastal Commission within five (5) years with the findings and conclusions regarding the tidal restoration experiment and, following authorization by the FAA to proceed, the City shall act as lead agency to implement the approved tidal restoration projects. Policy C-11 and special condition 5 also includes a requirement for additional wetland mitigation and restoration of approximately 13.99 acres to fulfill the 4:1 mitigation requirement, with priority given to on-site mitigation, should it be determined that tidal restoration is an infeasible alternative for fulfilling the 4:1 wetland mitigation requirement.

The CDP for the Airfield Safety Projects, as approved by the City, requires compliance with all mitigation measures included in LCP Amendment 1-02 to ensure that impacts to sensitive wetland and open water habitat resulting from the airfield safety projects will

be minimized and that adequate mitigation is provided to ensure long-term persistence of sensitive habitat areas of Goleta Slough, consistent with the requirements of Section 30233 of the Coastal Act.

For all of the reasons stated above, the Commission finds that the Airfield Safety Projects – Wetland Restoration Plan, as approved by the City of Santa Barbara, in conformance with applicable policies of the certified LCP and attached special conditions are consistent with the provisions of Section 30233 of the Coastal Act.

C. Coastal Act Policy 30240

Section 30240 of the Coastal Act states:

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

Environmentally Sensitive Habitat Areas (ESHA) are defined as areas in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments. Section 30240 of the Coastal Act states that ESHAs shall be protected against disruption of habitat values and that only uses dependent on the resources be permitted within an ESHA.

Upland vegetation classified as ruderal has colonized most of the upper surfaces of the artificial dikes and berms that line the Slough's basins and creek channels. Scrub vegetation is scattered over many parts of the area. Coastal bluff scrub is common at the project area, and Coastal sage scrub vegetation occurs along the southern margin of Goleta Slough. The City is proposing upland habitat mitigation and restoration plans as part of the approval of the Airfield Safety Projects which is detailed in the Proposed Upland Habitat Mitigation, Aviation Facilities Plan – Airfield Safety Projects, Santa Barbara Airport, dated April 6, 2002. The upland habitat mitigation plan concludes that no oak woodland, coastal sage scrub, or native grassland will be impacted by construction of the airfield safety projects. Approximately 10.9 acres of upland habitat would be permanently impacted as a result of the proposed airfield safety projects, however, the effected upland habitat consists mostly of non-native annual grassland and weeds.

Mitigation plans include upland habitat restoration to be implemented at a minimum 1:1 ratio, as detailed in certified LCP Policy C-11. In addition, the Proposed Upland Habitat Mitigation, Aviation Facilities Plan – Airfield Safety Projects, Santa Barbara Airport, dated April 6, 2002, identifies mitigation sites for upland habitat which include new upland habitat areas that would be created with the filling of Tecolotito and Carneros

creeks due to their relocation, and additional upland habitat areas that will be created in the safety area west of Runway 7-25. The mitigation plan specifies that approximately 8 acres of upland habitat will be created in these areas by revegetating the areas to annual grassland with native grasses, perennial herbs, and low growing shrubs. Approximately 4 acres near the new Runway Safety Area, presently used for dewatering and temporary storage of spoils dredged from the sediment basins of Tecolotito and Carneros creeks, would also be restored to upland habitat. This area will also serve as a buffer between the shifted runway and Carneros Creek. Restoration efforts will include revegetation using California brome, meadow barley, quail bush, coyote brush, giant ryegrass, California sagebrush, and coastal goldenbush.

Additional upland habitat enhancement efforts included in the upland habitat mitigation plan for the airfield safety projects include weeding and protecting 8.4 acres of upland habitat that surrounds the wetland areas to be restored in Area I. The surrounding habitat currently contains extensive coyote brush scrub and several small oak groves. Enhancement efforts in this area will include removal of eucalyptus trees, pampas grass, and scattered tamarix. The upland habitat area proposed for enhancement is adjacent to a habitat restoration site on the North Bluffs of the University of California at Santa Barbara. As such, the upland habitat enhancement efforts in this area will complement the existing habitats along the southern edge of Goleta Slough, providing a contiguous upland habitat area and buffer to the tidal wetlands of the Slough.

A number of sensitive plant and animal species are known to occur on or near the Airport/Goleta Slough site including Southern California Steelhead and the Belding's Savannah Sparrow, Southern Tarplant and Coulter's Goldfields. The LCP, as amended, includes new policy language for extensive habitat mitigation plans that will serve to minimize the loss and disturbance of sensitive habitat areas that may occur as a result of development of the airfield safety projects. The habitat restoration plans, which will be carried out pursuant to the provisions of the City's habitat mitigation policy C-11, as required by special condition 5, will ultimately provide additional habitat area with significant restored habitat value and function that will serve to support sensitive plant and wildlife species on the site. In addition, policies C-15 and C-16 and attached special condition 8 require that avoidance and/or protection measures be implemented for development projects which could potentially impact sensitive plant or wildlife species, including timing of development activities to avoid disturbance of fish and wildlife, requiring site surveys and development of plans to avoid and/or minimize disturbance of special status species prior to commencement of construction activities, and implementation of detailed mitigation and restoration plans for unavoidable impacts to sensitive plant species. The LCP, as amended to incorporate provisions for the Airfield Safety Projects includes a comprehensive set of policies to protect and preserve the sensitive plant and wildlife species onsite, and significant habitat areas that support such species, consistent with Section 30240 of the Coastal Act. The Airfield Safety Projects and the subject Wetland Restoration Plan, as approved by the City and as required to comply with attached special conditions 5 and 8, are required to comply with all applicable policies of the certified LCP, as amended to provide for the projects, and therefore, are also consistent with Section 30240 of the Coastal Act.

The airfield safety projects may potentially impact Essential Fish Habitat and steelhead in Goleta Slough due to construction activities and temporary stream diversion that will be conducted for the relocation of Tecolotito Creek. Water quality impacts associated with improvements and modifications to the areas disturbed by construction of the safety projects, including an overall increase of impervious surface area and development footprint, and subsequent polluted stormwater discharge, may also adversely affect steelhead migration. To ensure that the approval of the airfield safety projects does not result in adverse impacts to EFH and steelhead, Policies C-15 and C-16 in the City's certified LCP and attached special condition 8 require that special protection measures be implemented to avoid and minimize potential adverse impacts to Essential Fish Habitat and steelhead. Policy C-16 and special condition 8 specifically requires that construction activities related to the west creek realignment project minimize extensive stream flow diversions during construction and that construction of the new creek channel be completed prior to connecting with the existing channel. Policy C-16 and special condition 8 also requires that final diversion of stream flow into the new creek channel be conducted between July 15 and October 1 to avoid the migration period of steelhead.

In addition to the recommended sensitive habitat and species protection policies, the projects are required to comply with Policies C-12 through C-14, as embodied in attached special conditions 6 and 7, which will serve to mitigate potential adverse impacts resulting from construction activities, as well as cumulative adverse water quality impacts that could result from development of the airfield safety projects.

Policies C-15 and C-16 and attached special condition 8 also provide for the preservation and mitigation of the Southern Tarplant and Coulter's Goldfields. The intent of the policies are to preserve and protect the sensitive plant species onsite and to establish new populations onsite where necessary for mitigation efforts, which will be protective of the sensitive plant species as required under Section 30240 of the Coastal Act. Policy C-16 and special condition 8 specifies that surveys shall be conducted prior to construction activities, which will determine the extent of possible impacts on sensitive plant species, and that potential impacts be avoided or fully mitigated. The policy also enhances protective measures by requiring that mitigation and restoration plans be prepared by a qualified botanist or resource specialist and describes methods for mitigating impacts such as species specific salvage or seed collection, salvage of topsoil, restoration of disturbed areas and establishment of new populations in suitable habitat areas. Additionally, in order to ensure effective and lasting preservation of the sensitive plant species, the policy requires detailed maintenance and monitoring plans to be developed and implemented. The Commission finds that the protective measures detailed in LCP policies C-15 and C-16 and special condition 8, as incorporated into approved CDP, are adequate to protect sensitive plant species and carry out the intent of Section 30240 of the Coastal Act.

Implementation of the City's proposed wetland mitigation plans as incorporated into the approved CDP will result in additional areas of potential habitat for the Belding's

savannah sparrow in a continuous corridor along the realigned stream corridor. As such, Policy C-11 and special condition 5 provides mitigation measures necessary to address potential impacts to the sensitive species. Policies C-15 and C-16 and special condition 8 will further ensure that potential impacts on the Belding's savannah sparrow are avoided and minimized to the maximum extent feasible by requiring that site surveys be conducted prior to commencement of construction activities and that a qualified biologist or resource specialist develop an avoidance and/or mitigation plan for implementation to minimize potential impacts. Policy C-16 and special condition 8 also provides that construction is not to take place during the nesting and breeding season for bird species, unless specifically authorized by a qualified biologist/resource specialist and the California Department of Fish and Game, and only upon a determination that construction activities will not adversely impact sensitive species. The CDP approved by the City requires compliance with these policies as well.

For all of the reasons stated above, the Commission finds that the Airfield Safety Projects, Wetland Restoration Plan, are consistent with Section 30240 of the Coastal Act.

D. Conclusion

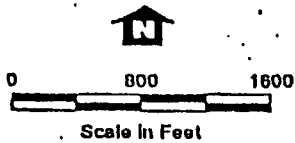
In two previous actions the Commission the Commission has found the proposed Airfield Safety Projects and Wetland Restoration Plan consistent with Sections 30233, and 30240 of the Coastal Act (as well as Section 30236). The proposed projects, as approved by the City, are identical to the projects previously approved by the Commission in its Federal Consistency Determination and LCP Amendment certification as described in this report. The approved projects comply with all applicable policies of the certified LCP and with Sections 30233 and 30240 of the Coastal Act by incorporating specific mitigation, restoration, and monitoring measures required by the LCP into the proposed projects and by special condition compliance requirements attached to this permit. Therefore, the Commission finds that the Airfield Safety Projects, Wetland Restoration Plan components conform to the provisions of Sections 30233 and 30240 of the Coastal Act.




E. CEQA

Section 13096(a) of the Commission's administrative regulations requires Commission approval of Coastal Development Permit application to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect, which the activity may have on the environment.

The Commission finds that, the proposed project, as conditioned will not have significant adverse effects on the environment, within the meaning of the California

Environmental Quality Act of 1970. Therefore, the proposed project, as conditioned, has been adequately mitigated and is determined to be consistent with CEQA and the policies of the Coastal Act.



Explanation	
	City of Santa Barbara Permit Jurisdiction. CCC Appeal Jurisdiction.
	City of Santa Barbara Permit Jurisdiction. CCC Appeal Jurisdiction. (Public Trust resources that have been filled.)
	California Coastal Commission Permit Jurisdiction

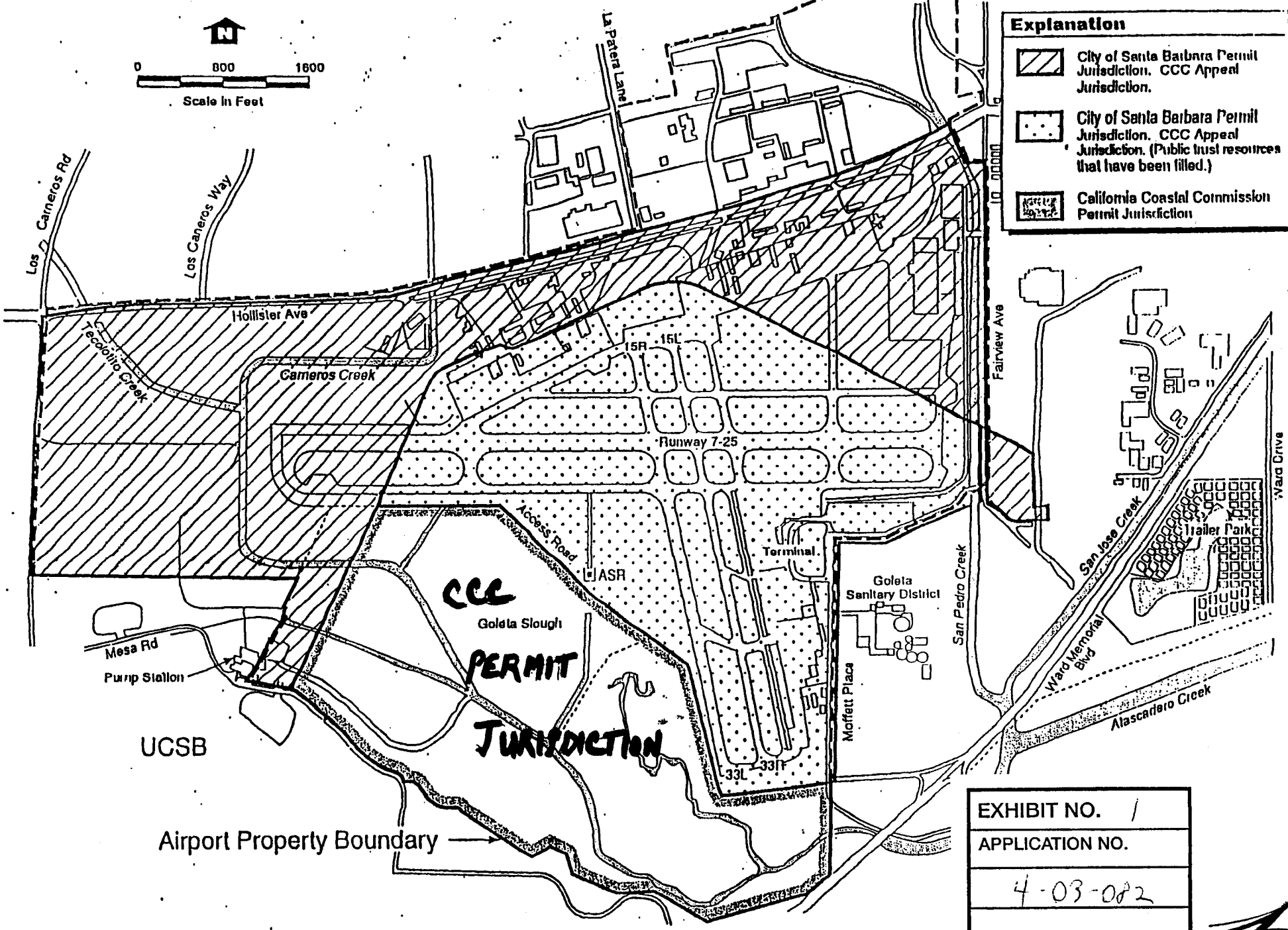
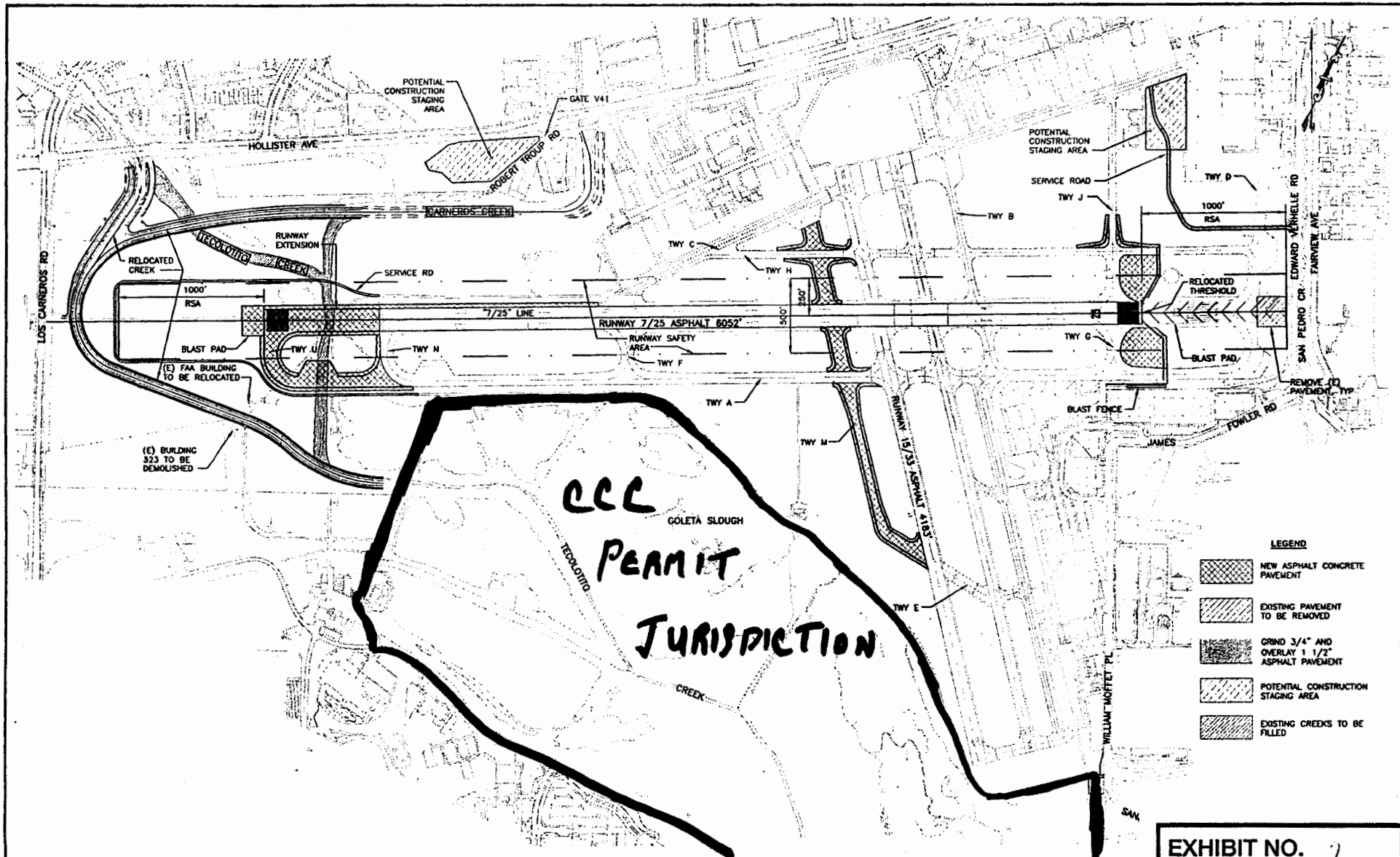


EXHIBIT NO. 1
APPLICATION NO.
4-03-082



**CCC
PERMIT
JURISDICTION**

- LEGEND**
- NEW ASPHALT CONCRETE PAVEMENT
 - EXISTING PAVEMENT TO BE REMOVED
 - GRIND 3/4" AND OVERLAY 1 1/2" ASPHALT PAVEMENT
 - POTENTIAL CONSTRUCTION STAGING AREA
 - EXISTING CREEKS TO BE FILLED

NO.	DESCRIPTION	DATE	APPROVED

URS
 130 ROBIN HILL ROAD, SUITE 100
 SANTA BARBARA, CA 93117
 PHONE: (805) 964-9010
 FAX: (805) 964-0299

DESIGN _____ CHECKED _____
 CAD _____
 PROJECT ENGINEER _____ DATE: _____
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CITY OF SANTA BARBARA
 SANTA BARBARA MUNICIPAL AIRPORT
 SANTA BARBARA, CALIFORNIA
 AIRPORT SAFETY PROJECT

CITY OF SANTA BARBARA
 PUBLIC WORKS DEPARTMENT-ENGINEERING
 APPROVED: _____ DATE _____
 CITY ENGINEER

EXHIBIT NO. 2
APPLICATION NO.
 4-03-012

EXHIBIT NO. 3
APPLICATION NO.
4-03-082

RESOLUTION NO. 03-072

A RESOLUTION OF THE COUNCIL OF THE CITY OF SANTA BARBARA MAKING THE FINDINGS TO APPROVE A GOLETA SLOUGH RESERVE ZONE (G-S-R) COASTAL DEVELOPMENT PERMIT FOR THE PORTION OF THE AIRFIELD SAFETY PROJECTS IN THE APPEALABLE JURISDICTION OF THE COASTAL ZONE (SBMC §29.25.020(A.)) SUBJECT TO CONDITIONS OF APPROVAL.

WHEREAS, The Airfield Safety Projects are comprised of projects to improve operational safety at Santa Barbara Airport and would not increase the capacity of the Airport's runways, nor result in a change in the type of aircraft used at Santa Barbara Airport; and

WHEREAS, on December 11, 2001, the City Council certified the Final Aviation Facilities Plan Environmental Impact Report (EIR) and adopted the Aviation Facilities Plan, which includes the Airfield Safety Projects; and

WHEREAS, on June 10, 2002, the California Coastal Commission adopted findings concurring with the City of Santa Barbara's Federal Consistency Certification of the Aviation Facilities Plan;

WHEREAS, on December 10, 2002, the California Coastal Commission unanimously certified a Local Coastal Program Amendment for the Airfield Safety Projects, including text changes and land use and zoning designation map revisions necessary to implement the Airfield Safety Projects and new resource protection policies; and

WHEREAS, the City accepted an application from Santa Barbara Airport for: (1) A recommendation to the California Coastal Commission for a Coastal Development Permit for a project in the Coastal Commission's permanent jurisdiction (SBMC §28.45.009(6.)(p.)); (2) A Goleta Slough Reserve (G-S-R) Coastal Development Permit for development within the Goleta Slough Reserve Zone for the portion of the project located in the appealable jurisdiction of the Coastal Zone (SBMC §29.25.020(A.)); and (3) A recommendation to the California Coastal Commission for G-S-R Coastal Development Permit for development within the Goleta Slough Reserve Zone for the portion of the project located in the Coastal Commission's permanent jurisdiction (SBMC §29.25.020(A.)); and

WHEREAS, on June 19, 2003, the Planning Commission considered the project applications, including the Final Aviation Facilities Plan EIR and Addendum, and conducted a public hearing. Upon the close of the public hearing, the Planning Commission made the appropriate environmental findings,

approved the G-S-R Coastal Development Permit for the portion of the project in the appealable jurisdiction of the Coastal Zone and recommended to the California Coastal Commission that the Coastal Development Permit and G-S-R Coastal Development Permit in the Coastal Commission's permanent jurisdiction be approved; and,

WHEREAS, on June 26, 2003 the City of Goleta filed an appeal of the Planning Commission's decision on the G-S-R Coastal Development Permit for the portion of the project in the appealable jurisdiction of the Coastal Zone pursuant to Municipal Code §28.45.009(j.) and Chapter 29.25; and

WHEREAS, on July 15, 2003, the City Council conducted a noticed public hearing for the appeal. The Council considered the Planning Commission action, Staff reports, and testimony from the applicant, Staff, appellant, and members of the public.

NOW, THEREFORE, BE IT RESOLVED THAT THE COUNCIL OF THE CITY OF SANTA BARBARA:

- I. Approves the Goleta Slough Reserve Coastal Development Permit for the portion of the Airfield Safety Projects in the appealable jurisdiction of the Coastal Zone, making the following findings and determinations:

- A. **Environmental Findings:**

1. Consideration of Final EIR/EIS

The City Council has reviewed and considered the information contained in the Final Aviation Facilities Plan EIR along with public comments received and final document responses and the Addendum dated June 19, 2003, and finds that the Final EIR and Addendum was completed in compliance with the California Environmental Quality Act (CEQA) and reflects the independent judgment and analysis of the City Council and constitutes adequate environmental evaluation and documentation for the Airfield Safety Projects (West Creek Realignment Runway Safety Area Alternative, new Taxiway M and service road).

2. Class I Impacts: Significant Unavoidable Impacts

The Final AFP EIR/EIS and Addendum identify no significant unavoidable environmental impacts associated with the Airfield Safety Projects.

3. Class II Impacts: Potentially Significant Impacts Mitigated to Insignificant Levels

Mitigation measures have been required and/or changes incorporated into the Airfield Safety Projects which would avoid or substantially lessen the following potentially significant effects of the Airfield Safety Projects described in the Final AFP EIR/EIS and Addendum to less than significant levels: air quality, hazardous materials, water quality, cultural resources, biotic communities and wetlands, endangered and threatened species, floodplains, and geology. These impacts and mitigation measures are summarized as follows:

a. Air Quality

Potential air quality impacts from temporary construction-related fugitive dust (PM₁₀) would be mitigated by the implementation of appropriate dust control measures (Mitigation Measures [MM] 3.5-1, -2, -3, -4, -5, -6) throughout grading and construction of the Airfield Safety Projects.

b. Hazardous Materials

Potential hazardous materials impacts due to exposure of the public, workers or the environment to contaminated soil or accidental spills during construction or ongoing vehicle maintenance and refueling would be mitigated by the implementation of a Construction Contingency Plan (MM 3.6-1), remediation plan procedures (MM 3.6-2), and best management practices for refueling, equipment maintenance and materials storage to prevent spill contamination (MM 3.6-3).

c. Water Quality

Potential water quality impacts to local waterways due to sedimentation and/or hazardous materials release during construction would be mitigated by implementation of a drainage and erosion control plan and Best Management Practices (MM 3.7-1) and channel management (MM 3.7-2) throughout the construction process.

Potential water quality impacts to the Goleta Slough from non-point source pollutants during project operations would be mitigated with installation and maintenance of sediment, silt and grease traps and filters (MM 3.7-3).

d. Cultural Resources

Potential archaeological resource impacts (project-specific impacts and project contributions to regional cumulative impacts) due to ground disturbances near archaeological sensitivity zones during construction would be mitigated by maintaining buffers from sensitivity zones, marking of sensitivity zones, and inspection by an archaeologist (MM 3.9-1), specified procedures for unanticipated resource discoveries, including education of construction workers, assessment of resources pursuant to City procedures, and mitigation of impacts as necessary (MM 3.9-2), and archaeological monitoring (MM 3.9-5).

Potential historic resources impacts due to removal of Building 323 as part of the Airfield Safety Projects would be mitigated by photo-documentation prior to demolition (MM 3.9-3).

e. Biotic Communities and Wetlands

Impacts to biotic communities and wetlands due to temporary disturbance and permanent loss or degradation of wetland and upland habitats and contribution to cumulative wetland loss and degradation from construction of Airfield Safety Projects would be mitigated by continued participation in the Goleta Slough Management Committee (MM 3.10-1, 3.12-2), implementation of a wetland mitigation program (MM 3.10-2), monitoring of restored wetlands (MM 3.10-3), installation of temporary protection fencing (MM 3.10-4), location of soil and materials storage and heavy equipment haul routes (MM 3.10-5), salvage of wetland plants and topsoil (MM 3.10-6), measures to avoid breeding and nesting areas and minimize soil compaction and erosion (MM 3.10-7), establishment of appropriate water regimes in disturbed areas (MM 3.10-8), methods for re-creation of wetlands (MM 3.10-9), and mitigation requirements under the Coastal Act and Clean Water Act (MM 3.12-1).

Impacts associated with potential failure of estuarine wetland functions and values from stream channel realignment would be mitigated by revegetation of new channel banks (Mitigation Measure 3.10-10) and phasing of revegetation and channel reconnection (MM 3.10-11).

Impacts due to loss of seasonal wetlands from Taxiway M improvements would be mitigated by restoration of wetlands (MM 3.10-1 through 3.10-9).

f. Endangered and Threatened Species

Potential impacts to sensitive wildlife and plant species associated with disruption of breeding and habitat loss for Belding's savannah sparrow, loss and disturbance of Coulter's goldfields and Frost's tiger beetle, loss of sensitive plant species (southern tarplant, horned seabligh and giant horsetail), and disruption of steelhead migration would be mitigated respectively by wetland mitigations (MM 3.11-1), design and location of construction to minimize habitat loss and disturbance (MM 3.11-2), re-establishment of sensitive plants (Mitigation Measure 3.11-3), and measures to facilitate steelhead migration (MM 3.11-4).

g. Floodplains

Potential flooding impacts due to construction of a portion of the new service road within a regulatory floodplain would be mitigated by design and construction to avoid decreasing conveyance capacity of the floodway, as confirmed by City approval of a Simple Floodway Revision (MM 3.13-4).

h. Geology

Potential geologic impacts associated with expansive soils, liquefaction and erosion would be mitigated by incorporation of grading and earthwork recommendations into the project design in accordance with geotechnical report recommendations (MM 3.15-1 and -2).

i. Ground Transportation

Temporary traffic, circulation and parking impacts during construction would be mitigated by implementation of traffic and parking management plan measures including a pre-construction conference (MM 3.23-10), routing of construction traffic to avoid the Fairview/Hollister intersection during peak-hour commute periods (MM 3.23-11), scheduling of trips by large hauling trucks outside of peak-hour commute periods (MM 3.23-12), location of construction materials and equipment storage to minimize traffic and circulation impacts (MM 3.23-13), and location of construction worker parking to minimize effects on traffic and circulation (MM 3.23-14).

The City Council hereby finds that all significant effects on the environment identified in the Final Aviation Facilities Plan EIR have been eliminated or substantially lessened and the project will not have a significant effect on the environment.

4. Class III Impacts: Less than Significant Impacts

Recommended mitigation measures and/or changes incorporated into the Plan have been included which would further avoid or reduce the following impacts already identified as insignificant project-specific impacts and/or incremental project contributions to cumulative impacts such that project impacts would be minimized to the extent feasible: air quality, water supply, biotic communities, floodplains, solid waste, ground transportation and lighting and visual aesthetics.

a. Air Quality

Short-term construction equipment emissions would be reduced with implementation of standard mitigation measures for maintenance and use of heavy equipment (MM 3.5-8).

b. Water Supply

Water demand increases associated with project operations would be lessened with the continuation of the Airport's water conservation measures for exterior water use (MM-3.74).

c. Biotic Communities

Elimination of upland habitat west of Tecolotito Creek would be mitigated with continued participation in the Goleta Slough Management Committee work including baseline studies, biological and water quality mitigation oversight and monitoring (MM 3.10-1).

d. Floodplains

Potential flooding effects associated with changes and filling of a portion of the Regulatory Flood-way would be avoided through processing of a Federal Emergency Management Agency (FEMA) Letter of Map Revision (LOMR) confirming no substantial increase in the 100-year flood surface elevation (MM 3.13-1) and channel design to maintain flood carrying capacity (MM 3.13-2).

e. Solid Waste

Increased solid waste generation would be reduced with implementation of solid waste management plans for source reduction and recycling during project construction (MM 3.20-1).

5. Record of Proceedings

The location and custodian of documents and materials that constitute the record of proceedings upon which this decision is based is the City of Santa Barbara Community Development Department, Planning Division, 630 Garden Street, Santa Barbara, CA.

6. Department of Fish and Game Finding

As described in the Final Aviation Facilities Plan Final EIR/EIS, the Airfield Safety projects have the potential to affect wildlife resources and their habitat. The project is, therefore, subject to payment of the California Department of Fish and Game environmental review fee.

7. Alternatives

Specific economic, legal, social, technological and other considerations make the project alternatives identified in the Final EIR/EA infeasible for the following reasons:

a. No Action Alternative

The No Action Alternative involving no Airfield Safety Projects improvements would not meet basic project objectives for establishing necessary runway safety areas required under federal regulations, or for providing other necessary operational safety improvements. The No Action Alternative would result in inadequate runway safety areas, taxiways, and service roads to serve existing and future aviation activity. Other beneficial mitigations such as increased sedimentation basin capacity in the Goleta Slough would not occur with the No Action Alternative.

b. Runway Safety Project West Creek Culvert
Alternative 2

The Runway Safety Project West Creek Culvert Alternative 2 would not reduce any significant impacts associated with the proposed Creek Realignment Alternative and would result in additional significant unmitigable impacts to biotic communities and sensitive species (elimination of stream channel area and adjacent stream bank habitat and wetlands, with associated estuary fragmentation, migration barriers, increased sedimentation, hydrology alteration, habitat disturbance, and loss of local plant populations) and floodplains (potential creek blockage from storm damage to safety areas), which would be inconsistent with Local Coastal Policies for protection of the Goleta Slough and California Coastal Act policies for protection of wetlands. The West Creek Culvert Alternative

would also have difficult maintenance and safety concerns with removal of debris and sediment and culvert maintenance.

c. Other Alternatives

As described in the Final AFP EIR/EIS and determined during the public scoping process, other alternatives to the proposed Aviation Facilities Plan and implementing projects are infeasible, as follows:

AFP Alternatives: The use of other airports in the County or adjacent counties would not meet project objectives, and would result in greater overall significant effects in the locations of the other airports compared to the proposed project.

Establishing a new airport in an alternative location, such as an island off the coast, would involve significantly greater environmental effects and significantly higher costs than the proposed project and may be jurisdictionally infeasible.

Runway Safety Area Alternatives: A reduced runway length with extended safety areas would preclude all but small aircraft use and would not meet project objectives for accommodating projected future passengers and aircraft operations, nor would this alternative meet the goal of providing access to the National Air Transportation System.

Extension of the runway and safety areas to the east would involve significantly greater environmental impacts including biological effects from crossing three creeks, and rerouting of Fairview Avenue, and would involve substantially higher construction and operational costs.

The Displaced Threshold runway safety area alternative would not meet functional operations objectives and would increase the runway length and therefore would marginally increase the capacity of flights to the west, it may not be consistent with Coastal Act and Local Coastal Program policies.

Taxiway Alternatives: A shorter Taxiway alternative would be operationally ineffective and would create safety, maintenance, and capacity problems.

A full-length Taxiway M Alternative would involve substantial encroachment into the Goleta Slough and associated significant effects to biotic communities, wetlands, and sensitive species.

Extended Runway 15R/33L Alternative: This alternative improvement providing a second runway for larger aircraft would not perceptibly decrease noise levels east and west of Runway 7/25, would imperceptibly increase noise levels north of Runway

15R/33L, and would substantially increase noise levels at UCSB and Goleta Beach Park. This alternative would also have significantly greater biological impacts from removal of wetlands and fill placement in the Goleta Slough and Tecolotito Creek.

8. Mitigation Measure Enforceability and Mitigation Monitoring and Reporting Program

Feasible mitigation measures identified in the Final Aviation Facilities Plan EIR/EIS Addendum would be fully enforceable through the conditions of project approval in Exhibit A.

B. Findings for the Goleta Slough Reserve Coastal Development Permit:

1. The project is consistent with the City's Coastal Land Use Plan and all applicable provisions of the Municipal Code as follows:

Citywide Local Coastal Plan (LCP):

- a. The Airfield Safety Projects would be consistent with General Policy 1.1 of the City-wide LCP because the project would be consistent with the policies of the California Coastal Act as stated in the findings above.
- b. The Airfield Safety Projects would be consistent with the Water and Marine Environments Policy 6.1 of the City-wide LCP because the Airfield Safety Projects would not result in significant unavoidable adverse impacts on sensitive biotic communities upon implementation of the Wetland Mitigation Plan.
- c. The Airfield Safety Projects would be consistent with the Water and Marine Environments Policy 6.2 of the City-wide LCP because all relevant laws protecting marine resources, maintaining optimum populations of marine organisms and maintaining the quality of the marine environment for the protection of human health would be supported and enforcement encouraged. The Airfield Safety Projects would incorporate enlarged sediment basins in Tecolotito and Carneros Creeks and the Construction Phase Erosion Control Plan that would minimize construction-phase erosion and siltation that could affect the Goleta Slough and marine resources at the mouth of the Slough.
- d. The Airfield Safety Projects would be consistent with the Water and Marine Environments Policy 6.8 of the City-wide

LCP because the Airfield Safety Projects would not result in impacts on Coastal creeks that would not be mitigated to less than significant levels. The City would continue to participate in and support the goals of the Goleta Slough Management Committee to maintain, preserve, enhance and restore the ecosystem of Goleta Slough.

- e. The Airfield Safety Projects would be consistent with the Water and Marine Environments Policy 6.9 of the City-wide LCP because all requirements of the Regional Water Quality Control Board would be carried out, including all mitigation measures required by the EIR, all Best Management Practices and implementation of Airport and Goleta Slough LCP Policies C-12, C-13 and C-14.
- f. The Airfield Safety Projects would be consistent with the Water and Marine Environments Policy 6.10 of the City-wide LCP because setbacks from the top of existing and new creek banks would be provided and those setback areas would be planted with native vegetation appropriate to the Goleta Slough.
- g. The Airfield Safety Projects would be consistent with the Water and Marine Environments Policy 6.11 of the City-wide LCP because the proposed alterations of Tecolotito and Carneros Creeks have incorporated the recommendations of the Wetland Mitigation Plan that includes the best feasible mitigation measures.

Airport and Goleta Slough Component of the LCP:

- h. The Airfield Safety Projects would be consistent with Policy A-1 of the Airport and Goleta Slough LCP because access to Goleta Slough would continue to be restricted to those persons and organizations conducting compatible research and educational projects and opportunities for dry land tours of the Goleta Slough would be provided.
- i. The Airfield Safety Projects would be consistent with Policy B-1 of the Airport and Goleta Slough LCP because areas and facilities on the periphery of the Slough for recreational and educational use would be provided as would opportunities for dry land tours of the Goleta Slough.
- j. The Airfield Safety Projects would be consistent with Policy C-1 of the Airport and Goleta Slough LCP because the City

would continue to work with the California Department of Fish and Game to amend the Memorandum of Understanding if needed to remove areas affected by the Airfield Safety Projects from the Reserve and add other appropriate areas.

- k. The Airfield Safety Projects would be consistent with Policy C-4 of the Airport and Goleta Slough LCP because buffers would continue to be provided along the periphery of all wetland communities, including those in the proposed mitigation area. Buffers of 100 feet in width have been provided where feasible, and in areas where the Airfield Safety Projects render maintenance of a 100-foot buffer infeasible, all impacts to wetlands have been mitigated to the maximum extent feasible pursuant to the October 2001 Wetland Mitigation Plan and the May 10, 2003 Update such that no net loss of wetland habitat shall occur.
- l. The Airfield Safety Projects would be consistent with Policy C-5 of the Airport and Goleta Slough LCP because the development would include enlarged sediment basins on Tecolotito and Carneros Creeks and implementation of an Erosion Control Plan and Stormwater Pollution Prevention Plan (SWPPP) to reduce the amount of sediment entering the Goleta Slough.
- m. The Airfield Safety Projects would be consistent with Policy C-6 of the Airport and Goleta Slough LCP because the existing level of tidal action in the Slough would not change with the implementation of the Airfield Safety Projects. As outlined in the October 2001 Wetland Mitigation Plan, weeds and other non-natives would be replaced with estuarine and palustrine plants that should support marine organisms. Depending on the outcome of the Tidal Circulation Experiment, the wetland mitigation for the project may incorporate up to 13.3 acres of tidal restoration in Goleta Slough.
- n. The Airfield Safety Projects would be consistent with Policy C-8 of the Airport and Goleta Slough LCP because no significant unavoidable impacts to wetland habitat would result and implementation of the Wetland Mitigation Plan would result in enhancement and restoration of wetland habitats and existing natural open space areas in the Goleta Slough.
- o. The Airfield Safety Projects would be consistent with Policy C-9 of the Airport and Goleta Slough LCP because the

proposed project would be consistent with Coastal Act policies 30233, 30230, 32032 and 30607.1. The proposed incidental public service uses and restoration activities are permitted pursuant to PRC 30233.

- p. The Airfield Safety Projects would be consistent with Policy C-10 of the Airport and Goleta Slough LCP because the proposed project and the Wetland Mitigation Plan incorporates key elements of the draft Goleta Slough Ecosystem Management Plan. The project and the Wetland Mitigation Plan were conceptually reviewed by the Goleta Slough Management Committee, which commented that the project and Wetland Mitigation Plan appeared consistent with the Goleta Slough Ecosystem Management Plan.
- q. The Airfield Safety Projects would be consistent with Policy C-11 of the Airport and Goleta Slough LCP because the proposed project would not result in the permanent net loss of wetland or upland habitat. The mitigation ratios specified in Policy C-11 have been incorporated into the October 2001 Wetland Mitigation Plan and the May 10, 2003 Update to the Wetland Mitigation Plan. All requirements of Policy C-11 have been incorporated into the proposed project and shall be implemented in full compliance with the policy.
- r. The Airfield Safety Projects would be consistent with Policy C-12 of the Airport and Goleta Slough LCP because the proposed project has been sited and designed to protect water quality and minimize impacts to coastal waters. The project would include enlarged sediment basins on Tecolotito and Carneros Creeks and implementation of a Construction Phase Erosion Control and Polluted Runoff Control Plan pursuant to LCP Policy C-14 and Stormwater Pollution Prevention Plan (SWPPP) to reduce the amount of sediment entering the Goleta Slough. The project also incorporates Best Management Practices, including installation of storm drain surface pollutant interceptors on all new storm drains and retrofitting of existing storm drains on the airfield. The proposed projects limits the increases to impervious surfaces and disturbance of natural drainage features and vegetation to that necessary to complete the Airfield Safety Projects as described in Chapters 5 and 7 of the Aviation Facilities Plan.
- s. The Airfield Safety Projects would be consistent with Policy C-13 of the Airport and Goleta Slough LCP because a Water Quality Mitigation Plan (WQMP) has been developed for the

project which incorporates and complements existing drainage patterns and systems and incorporates methods to capture and filter pollutants, provides post-development Best Management Practices (BMPs) and includes measures to prevent streambank erosion and creek or wetland siltation. Monitoring activities consistent with this policy have been incorporated into the WQMP.

- t. The Airfield Safety Projects would be consistent with Policy C-14 of the Airport and Goleta Slough LCP because Construction Phase Erosion Control and Polluted Runoff Control Plans have been developed for the project and incorporated into the project design and the SWPPP. The plans incorporate BMPs to minimize erosion and sedimentation, include revegetation of disturbed areas and limit grading activities during the rainy season.
- u. The Airfield Safety Projects would be consistent with Policies C-15 and C-16 of the Airport and Goleta Slough LCP because special status plant and wildlife protection measures have been incorporated into the project design. Final AFP EIR/EIS Mitigation Measures 3.11-1 through 3.11-5 would be implemented to mitigate potential impacts to special status plant and wildlife species. Habitat restoration for sensitive species would be provided under the Wetland Mitigation Plan for the project. The project design and Wetland Mitigation Plan incorporate the timing, implementation schedules and operational requirements identified in Policy C-16.
- v. The Airfield Safety Projects would be consistent with Cultural Resources Policies F-1 and F-3 of the Airport and Goleta Slough LCP because archaeological site Sba-52 would be avoided during construction of the Airfield Safety Projects and a fenced 50-foot buffer around the site would be provided during construction pursuant to EIR Mitigation Measure 3.9-2. Archaeological monitoring would be provided during construction of the East Service Road pursuant to Mitigation Measure 3.9-5.
- w. The Airfield Safety projects would be consistent with Public Resources Policy G-1 of the Airport and Goleta Slough LCP because water, wastewater and parking are available to meet the needs of the proposed development.
- x. The Airfield Safety Projects would be consistent with Land Use Policy H-1 of the Airport and Goleta Slough LCP

because, even though impacts to wetlands would result from the project, a Wetland Mitigation Plan would be implemented that would restore wetlands in Goleta Slough and would mitigate all wetland impacts to less than significant levels. Further, the existing sediment basins on Tecolotito and Carneros Creeks would be enlarged, thus reducing the amount of sediment that is deposited in the Goleta Slough and improving the condition of the ecosystem.

Santa Barbara Municipal Code:

- y. The project is consistent with the Municipal Code, including the requirements of the A-A-O/G-S-R/S-D-3 (Aircraft Operations and Approach/Goleta Slough Reserve/Coastal Overlay) Zones.
2. The project is consistent with the policies of the California Coastal Act as follows:
- a. California Coastal Act Sections 30230 and 30231 - Marine Environment - would be met because the mitigation measures included in the hazardous materials, water quality, biological resources, threatened and endangered species and wetlands sections of the Final AFP EIS/EIR have been incorporated into the Airfield Safety Projects. These mitigation measures, the two enlarged sediment basins on Tecolotito and Carneros Creeks, and the implementation of the Wetland Mitigation Plan, the Storm Water Pollution Prevention Plan (SWPPP) and the Water Quality Management Plan (WQMP) would maintain, protect and sustain the water quality resources in Goleta Slough.
 - b. California Coastal Act Section 30233 - Marine Environment - would be met because the Santa Barbara Airport, including its runways, and taxiways are considered public (transportation) services. The Airfield Safety Projects would not result in an increase in runway length or capacity or in the size of aircraft that are capable of using the runway. The project constitutes an incidental public service use. All mitigation measures and included in the Final AFP EIS/EIR relevant to the Airfield Safety projects and the October 2001 Wetland Mitigation Plan, the April 2002 Upland Mitigation Plan and the May 2003 Update have been incorporated into the design of the Airfield Safety Projects. The City has examined all reasonable alternatives, including the no action alternative, west creek culvert alternative, extended Runway

15R/33L alternatives, Runway 7/25 length reduction alternatives, displaced threshold alternative, use of other airports, extension of Runway 7/25 to the east, Engineered Material Arresting Systems (EMAS) and taxiway alternatives. The City has proposed the least environmentally damaging project alternative which feasibly achieves the safety objectives of the project.

- c. California Coastal Act Section 30236 - Marine Environment - would be met because the Airfield Safety Projects would increase flood protection for the runway because overbank flooding from the relocated creeks under a 10-year event would not impinge on the runway as it does under current conditions. The project would also implement the Wetland Mitigation Plan that provides for compensation for the loss of stream channel habitats with like-kind mitigation. The Airfield Safety Projects are necessary for public safety and would result in the improvement of fish and wildlife habitat in the mitigation areas.
- d. California Coastal Act Section 30240 - Land Resources - would be met because the mitigation measures in the Final AFP EIR/EIS relevant to the Airfield Safety Projects have been incorporated into the project design and would prevent impacts which would significantly degrade environmentally sensitive habitat areas of the Goleta Slough. These mitigation measures, the two enlarged sediment basins on Tecolotito and Carneros Creeks, and the implementation of the Wetland Mitigation Plan would protect the resources of Goleta Slough.
- e. California Coastal Act Section 30244 - Land Resources - would be met because archaeological site Sba-52 would be avoided during construction of the Airfield Safety Projects and a fenced 50-foot buffer around the site would be provided during construction pursuant to EIR Mitigation Measure 3.9-2. Archaeological monitoring would be provided during construction of the East Service Road pursuant to Mitigation Measure 3.9-5.
- f. California Coastal Act Section 30251 - Development - would be met because development of the Airfield Safety Projects would not substantially affect views of scenic coastal areas.

- g. California Coastal Act Section 30252 - Development - would be met because development of the Airfield Safety Projects would not further restrict access to the coast.
 - h. California Coastal Act Section 30253 - Development - would be met because standard construction practices would minimize potential geologic and fire hazards and all new development will be required to meet flood requirements as required by the Federal Emergency Management Agency (FEMA). All requirements of the Santa Barbara Air Pollution Control District have been incorporated into the required mitigation measures and energy consumption and vehicle miles traveled would be reduced by the mitigation measures.
3. The proposed use is dependent upon the resources of the environmentally sensitive area or the proposed use is found to be consistent with Section 30233 of the Coastal Act. The proposed use is an incidental public service use and is therefore consistent with Section 32033 of the Coastal Act.
 4. Development in areas adjacent to an environmentally sensitive area shall be designed to prevent impacts which would significantly degrade such area and shall be compatible with the continuance of such habitat. The proposed project would not result in the permanent net loss of wetland or upland habitat. The mitigation ratios specified in Policy C-11 have been incorporated into the October 2001 Wetland Mitigation Plan and the May 10, 2003 Update to the Wetland Mitigation Plan. All requirements of Policy C-11 have been incorporated into the proposed project design and shall be implemented in full compliance with the policy to ensure continuance of such habitat.
 5. A natural buffer area of 100 feet would be maintained in an undeveloped condition along the periphery of all wetland areas, except where development of the Airfield Safety Projects renders maintenance of a 100 foot buffer area between new development and delineated wetlands infeasible. In these areas, the maximum amount of buffer area would be provided and all impacts to wetland habitat would be mitigated to the maximum extent feasible pursuant to the October 2001 Wetland Mitigation Plan and the May 10, 2003 Update such that no net loss of wetland habitat occurs.
 6. The proposed use 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. The project would protect the quality of coastal waters by providing enlarged sediment basins on Tecolotito and Cameros Creeks and through implementation of a Construction Phase Erosion Control and Polluted Runoff Control Plan pursuant to LCP Policy C-14 and Stormwater Pollution Prevention Plan (SWPPP) to reduce the amount of sediment entering the Goleta Slough. The project also incorporates operational Best Management Practices, including installation of storm drain surface pollutant interceptors on all new storm drains and retrofitting of existing storm drains on the airfield.

7. The proposed project includes adequate impact avoidance and mitigation measures to ensure protection of rare, threatened, or endangered species that are designated or candidates for listing under State or Federal law, "fully protected" species and/or "species of special concern," and plants designated as rare by the California Native Plant Society.
8. There is no less environmentally damaging alternative to the proposed development, all feasible mitigation measures have been provided to minimize adverse environmental effects and, if applicable:
 - a. All dredged spoils shall be removed from the wetland area to avoid significant disruption to wildlife habitat and water circulation.
 - b. Diking, filling or dredging in the Goleta Slough shall maintain or enhance the functional capacity of the wetland or estuary.

The City has examined all reasonable alternatives, including the no action alternative, west creek culvert alternative, extended Runway 15R/33L alternatives, Runway 7/25 length reduction alternatives, displaced threshold alternative, use of other airports, extension of Runway 7/25 to the east, Engineered Material Arresting Systems (EMAS) and taxiway alternatives. The City has proposed the least environmentally damaging project alternative which feasibly achieves the public safety objectives of the project. All mitigation measures included in the Final AFP EIS/EIR and Addendum relevant to the Airfield Safety projects and the October 2001 Wetland Mitigation Plan, the April 2002 Upland Mitigation Plan and the May 2003 Update have been incorporated into the design of the Airfield Safety Projects to maintain and enhance the functional capacity of Goleta Slough.

9. Channelizations or other substantial alteration of rivers and streams shall incorporate the best mitigation measures feasible. All

mitigation measures identified for the Airfield Safety projects in the AFP Final EIR and Addendum have been incorporated into the project design.

10. Archaeological or other culturally sensitive resources within the Goleta Slough would be protected from impacts of the proposed development. Archaeological site Sba-52 would be avoided during construction of the Airfield Safety Projects and a fenced 50-foot buffer around the site would be provided during construction pursuant to Final AFP EIR Mitigation Measure 3.9-2. Archaeological monitoring would be provided during construction of the East Service Road pursuant to Mitigation Measure 3.9-5.
11. The proposed use would minimize any adverse effects of wastewater discharges, runoff and interference with surface water flow. Construction Phase Erosion Control and Polluted Runoff Control Plans have been developed for the project and incorporated into the project design and the SWPPP. The plans incorporate BMPs to minimize erosion and sedimentation, include revegetation of disturbed areas and limit grading activities during the rainy season. The project also incorporates operational Best Management Practices, including installation of storm drain surface pollutant interceptors on all new storm drains and retrofitting of existing storm drains on the airfield.
12. Sedimentation from the proposed development has been reduced to a minimum and is compatible with the maintenance of the wetland area. The Airfield Safety Projects would incorporate enlarged sediment basins in Tecolotito and Carneros Creeks and the Construction Phase Erosion Control Plan that would minimize construction-phase erosion and siltation that could affect the Goleta Slough.
13. The proposed project enhances public educational or recreational opportunities at the Goleta Slough including, but not limited to:
 - a. Providing area(s) and facilities on the periphery of the wetland for recreational and educational use of Slough; or,
 - b. Developing educational tour routes and procedures for such tours in dry land areas of the Slough.
 - c. Educational/explanatory signs shall be included as part of any walking tour or viewing facilities project.

Areas and facilities on the periphery of the Slough for recreational and educational use have been incorporated into the project design for the Airfield Safety Projects, including opportunities for dry land tours of the Goleta Slough.

II. Said approval is subject to the following conditions:

- A. The development of the Real Property approved by the Planning Commission on June 19, 2003 is limited to the improvements shown on the plans signed by the chairman of the Planning Commission on said date and on file at the City of Santa Barbara.
- B. The Santa Barbara Airport Department (Airport) shall provide for the uninterrupted flow of water through the Real Property including, but not limited to, swales, natural watercourses, conduits and any access road, as appropriate. The Airport is responsible for the adequacy of any drainage facilities and for the continued maintenance thereof in a manner, which will preclude any hazard of life, health or damage to the Real Property or any adjoining property.
- C. The Airport shall comply with the Landscape/Restoration Plan as approved by the Architectural Board of Review (ABR). Such plan shall not be modified unless prior written approval is obtained from the ABR. The landscaping on the Real Property shall be provided and maintained in accordance with said landscape/restoration plan.
- D. The Airport shall submit the following or evidence of completion of the following to the Public Works Department prior to the issuance of a Building permit or Public Works permit.
 1. The Water Quality Management Plan (WQMP) shall be finalized consistent with all requirements of Airport and Goleta Slough Local Coastal Program Policy C-13 based on the final construction plans submitted for building permit.
 2. Storm drain pollutant interceptors, sediment traps or other structural Best Management Practices (BMPs) for paved areas shall be incorporated into the project design as appropriate, to minimize turbidity, Total Suspended Solids (TSS), and pollution in Goleta Slough and to meet the requirements of Airport and Goleta Slough Local Coastal Program Policy C-13. These traps or BMPs could consist of storm drain pollutant interceptors, infiltration basins, infiltration trenches, vegetated filter strips, grassed swales, porous pavement, water quality inlets, detention ponds, filtration basins, and sand filters. Each of these devices shall include oil absorbing pillows, filters or other systems for sediment and pollutant removal. (*Required Mitigation Measure 3.7-3*).
 3. The Airport shall provide an Operations and Maintenance Procedure Plan describing maintenance of storm drain surface pollutant interceptors, sediment traps or structural BMPs, including replacement schedules for pollution

absorbing pillows, filters, or other systems. The Plan shall be reviewed and approved by the Water Resources Specialist (*Required Mitigation Measure 3.7-3*).

4. The Airport shall submit to the Land Development Engineer hydrology calculations for the 10, 25, and 100 storm events justifying that the onsite/offsite proposed and existing drainage conveyance systems adequately convey a 25-year storm event. If it is found infeasible to provide for an in system 25-year storm event the City Engineer may consider an alternative engineering design.
5. The Airport shall continue to implement its water conservation program in the project design including drip irrigation and general conservation policies and measures. (*Recommended Mitigation Measure 3.7-4*).
6. The Airport shall utilize reclaimed wastewater for exterior landscaping consistent with State and County standards where the Public Works Director deems it physically and financially feasible (*Recommended Mitigation Measure 3.7-5*).

E. The Santa Barbara Airport Department shall complete the following prior to the issuance of any building permits:

1. A qualified representative for the Santa Barbara Airport Department, approved by the City Planning Division, shall be designated as the Project Environmental Coordinator (PEC). The PEC shall be responsible for assuring full compliance with the provisions of the mitigation monitoring and reporting program to the City. 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.
2. At least 20 days prior to commencement of construction, the contractor shall provide written notice to all property owners, businesses and residents within 100 feet of the project area. The notice shall contain a description of the proposed project, a construction schedule including days and hours of construction, the name and phone number of the Project Environmental Coordinator (PEC) who can answer questions, and provide additional information or address problems that may arise during construction. A 24-hour construction hot line shall be provided and the number provided on the notice to allow property owners, businesses and residents to contact the PEC on an as-needed basis.

3. A qualified wetlands biologist shall be retained by the Airport to design and oversee the implementation of the wetlands mitigation for the Airport Aviation Facilities Plan mitigation project. The biologist shall have technical as well as management experience in order to coordinate the mitigation from design through implementation and monitoring. The two primary responsibilities of the biologist shall be as follows (*Required Mitigation Measure 3.10-2*):
 - a. Provide direct input into project layout, construction, planning and scheduling to minimize the extent of impacts on existing biological resources consistent with the Final Wetland and Upland Habitat Mitigation, Restoration Management, Maintenance and Monitoring Plans mandated under Airport and Goleta Slough Local Coastal Program Policy C-11.
 - b. Provide overall management of the biological aspects of the Airfield Safety Project mitigation program and other concurrent projects that may affect the Slough. This would include coordination with City departments, regulatory and other government agencies, construction crews, and the public.

The biologist shall be responsible for the following:

- a. Development and implementation of a site-specific plan for revegetation and restoration activities for the wetlands and the creek channel, and creek banks consistent with the requirements of Airport and Goleta Slough Local Coastal Program Policies C-11 and C-16. The plan will also include measures for control, of invasive exotic vegetation species in the project area, and a seeding plan for upland areas impacted during construction activities.
- b. Preparation of pre-construction and post-construction mitigation and monitoring reports, including maps and photographs of the mitigation and reference sites.
- c. Monitor previously mapped wetlands and endangered species habitats adjacent to approved construction areas to confirm the avoidance of impacts on these areas and sensitive species. Any impacts that do occur shall be documented to the City Planning Division, with notification to other responsible agencies.

- d. Contribute information to be incorporated into a database on the Goleta Slough biological resources for research and educational purposes.
4. Contract with an archaeologist from the most current City Qualified Archaeologists List for inspection of fencing and flagging of the 50-foot buffer from the moderate archaeological sensitivity zone associated with CA-SBA-52, and for monitoring ground disturbing activities during construction of the East Service Road. The fencing and flagging for CA-SBA-52 shall be maintained during all ground disturbing activity associated with the proposed realignment of Tecolotito Creek and construction of the project to ensure avoidance of prehistoric remains. The contract shall be subject to the review and approval of the Environmental Analyst.

The archaeologist's monitoring contract shall include the following provisions: If cultural resources are encountered or suspected, work shall be halted or redirected immediately and the City Environmental Analyst shall be notified. The archaeologist shall assess the nature, extent and significance of any discoveries and 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 further subsurface disturbance in the area of the find. Work in the area may only proceed after the

Environmental Analyst grants authorization (*Mitigation Measures 3.9-2 and 3.9-5*)

5. The Airport shall obtain a Conditional Letter of Map Revision (CLOMR) from the Federal Emergency Management Agency (FEMA) for the proposed project (*Required Mitigation Measure 3.13-1*).
6. Provide certification by a registered professional engineer to the Building Division demonstrating that encroachments into the floodway shall not result in any increase in the base flood elevation during the occurrence of the base flood discharge.
7. In addition to Best Management Practices, as a supplement to the pollutant controls specified in the Stormwater Pollution Prevention Plan (SWPPP), a Construction Phase Erosion Control and Polluted Runoff Control Plan consistent with Airport and Goleta Slough Local Coastal Program Policy C-14 shall be developed and implemented for each area of proposed construction to mitigate erosion from construction and to address subsequent sedimentation impacts to Goleta Slough. These plans shall contain the following erosion control measures (*Required Mitigation Measure 3.7-1*):
 - a. To the extent feasible, schedule construction to minimize the amount of graded soil exposed at any given time;
 - b. Newly-poured concrete (such as culvert structures) shall not be allowed to come into contact with the aquatic environment until the concrete has had time to cure properly. The minimum curing time is approximately seven to 14 days;
 - c. Clear brush and vegetation only as required to accommodate necessary grading;
 - d. Limit grading activities in the non-rainy season as specified in Airport and Goleta Slough Local Coastal Program Policy C-14. If construction during the rainy season is unavoidable as defined in Policy C-14, use silt fences, straw bales, and other erosion control measures to control siltation of local drainages during wet periods. Any grading during the rainy season shall provide full capacity for stream flow at all times;
 - e. Seed and plant disturbed areas with native vegetation or other appropriate and acceptable plant species immediately following construction activities;
 - f. Protect (e.g., riprap) any new storm drain outlets to prevent scouring at the point of discharge; and
 - g. Provide dust control by wetting exposed soil surfaces.

8. A Construction Contingency Plan consistent with Airport and Goleta Slough Local Coastal Program Policy C-14 shall be developed addressing methods to control potential migration of contamination discovered during construction as well as safety considerations for onsite construction personnel and the general public. Details of the plan shall include but not be limited to (*Required Mitigation Measure 3.6-1*):
 - a. Soils monitoring for identification of contaminated soil during and after construction for eroded and graded soils.
 - b. Measures that shall be taken immediately to protect workers and the public from exposure to contaminated areas (e.g., fencing or hazard flagging, covering contaminated soils with plastic, etc.) and prevent migration of the contaminants to the surrounding environment.
 - c. Steps to be taken following initial discovery of contaminated soils. Notification shall be made to the Santa Barbara County Environmental Health Services Division of the Santa Barbara County Fire Department immediately following identification of contamination within the construction area.
9. Procedures for refueling and equipment maintenance shall be developed and documented to prevent surface spills or other releases of contaminants from contaminating surface and/or groundwater. These activities shall be conducted in controlled areas where potential spills can be managed without affecting surface or groundwater quality. Fuels and oils shall be stored in appropriately sealed containers. The staging area used for the storage of these materials shall be lined and surrounded by protective dikes to provide full containment of any spilled materials (*Required Mitigation Measure 3.6-3*).
10. All losses of jurisdictional wetlands and waters shall be subject to review and supplemental mitigation as imposed by the California Coastal Commission and the Army Corps of Engineers (ACOE) consistent with the California Coastal Act, the Airport and Goleta Slough Local Coastal Program and Section 404 of the Clean Water Act. All mitigation shall be accomplished within the framework of the Draft Goleta Slough Ecosystem Management Plan and the Airport and Goleta Slough Local Coastal Program policies (*Required Mitigation Measure 3.12-1*).

11. The proposed channels for Tecolotito and Carneros Creeks shall be designed such that the flood carrying capacities of the channels are at least as great as the existing channels (*Required Mitigation Measure 3.13-3*).
 12. Those portions of the proposed service road located within the regulatory floodway shall be constructed so as not to decrease the conveyance capacity of the floodway. Prior to issuance of a building permit, a Simple Floodway Revision shall be processed if required by the City of Santa Barbara Building Official (*Required Mitigation Measure 3.13-4*).
 13. Project grading and earthwork recommendations shall be made by a registered Civil Engineer or certified Engineering Geologist and shall be incorporated into the final project design, including the final grading plan. All grading activities shall be supervised by a registered Civil Engineer or certified Engineering Geologist (*Required Mitigation Measure 3.15-1*).
 14. The Airport shall contract with a disposal company to recycle construction and demolition debris (*Recommended Mitigation Measure 3.20-1*).
 15. The City shall consult with the National Marine Fisheries Service (NMFS), the California Department of Fish and Game (CDFG), and the Santa Barbara County Flood Control District to identify feasible measures to facilitate steelhead migration in streams of the Goleta Slough consistent with the requirements contained in Airport and Goleta Slough Local Coastal Program Policy C-16. These measures shall be incorporated into the Final Wetland and Upland Mitigation, Restoration, Management, Maintenance and Monitoring Plan and the construction plans submitted for building permits and implemented to the maximum extent feasible (*Required Mitigation Measure 3.11-4*).
- F. Prior to issuance of a demolition permit for Building 323, the building shall be documented photographically with large format photographs and with measured drawings in accordance with City standards, in coordination with the City Historian, and under the direction of a qualified historic preservation professional. A binder containing these photographs, along with a copy of this report, shall be reviewed and approved by the City Planning Division and then deposited in the Gledhill Library of the Santa Barbara Historical Society before demolition is undertaken. A written receipt from the librarian to the Planning Division shall indicate that this mitigation measure has been fulfilled (*Required Mitigation Measure 3.9-3*).
- G. A construction conference shall be scheduled by the Contractor prior to the beginning of construction to discuss measures to

reduce potential construction-related impacts. Representatives from the City's Public Works Department, Building Division, Planning Division, the Airport and the Contractor, and the Santa Barbara County Public Works Department and Flood Control District shall be present (*Required Mitigation Measure 3.23-10*).

H. The following requirements shall be incorporated into, or submitted with the construction plans submitted to the Building and Safety Division with applications for building permits. All of these construction requirements must be implemented during construction and completed prior to the issuance of a Certificate of Occupancy:

1. A 50-foot buffer from the moderate archaeological sensitivity zone associated with CA-SBA-52 shall be maintained during all ground disturbing activity associated with the proposed realignment of Tecolotito Creek and construction of the project to ensure avoidance of prehistoric remains. The 50-foot buffer shall be clearly fenced and flagged to prevent access of construction personnel and equipment into the buffer area. Prior to any ground disturbing activity, a City-qualified archaeologist shall inspect the proposed construction fencing and flagging to ensure preservation of the site (*Required Mitigation Measure 3.9-1*).
2. Prior to the start of any vegetation or paving removal, demolition, trenching or grading, contractors and construction 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 further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization (*Required Mitigation Measure 3.9-2*).

3. All dust control mitigation measures shall be specified on a cover sheet for the construction plans submitted for building permits (*Required Mitigation Measure 3.5-6*).
4. Throughout construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this shall include wetting down such areas late in the late morning and after work is completed for the day. Increased watering frequency shall be required whenever the wind speed exceeds 15 mph. Reclaimed water shall be used whenever possible (*Required Mitigation Measure 3.5-1*).
5. 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.
6. The amount of disturbed area and on-site vehicle speeds shall be minimized (*Required Mitigation Measure 3.5-2*).
7. If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin (*Required Mitigation Measure 3.5-3*).
8. After clearing, grading, earth moving or excavation is completed, the entire area of disturbed soil shall be treated until the area is paved, revegetated or otherwise developed

so that dust generation will not occur. This may be accomplished by (*Required Mitigation Measure 3.5-4*):

- a. Seeding and watering until grass cover is grown;
 - b. Spreading soil binders;
 - c. Sufficiently wetting the area down to form a crust on the surface with repeated soakings as necessary to maintain the crust and prevent dust pickup by the wind;
 - d. Other methods approved in advance by the Air Pollution Control District.
9. Trucks transporting fill material to and from the site shall be covered from the point of origin.
10. The contractor shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD prior to land use clearance for map recordation and land use clearance for finish grading for the structure (*Required Mitigation Measure 3.5-5*).
11. The Contractor shall utilize shrouding or water application during demolition of buildings to mitigate emissions of fugitive dust (*Required Mitigation Measure 3.5-7*).
12. All construction equipment, including trucks, shall be professionally maintained and fitted with standard manufacturers' muffler and silencing devices.
13. The following requirements shall be adhered to where feasible during grading and construction to reduce emissions from construction equipment (*Recommended Mitigation Measure 3.5-8*):
- a. Use heavy-duty diesel powered construction equipment manufactured after 1996 (with federally mandated "clean" diesel engines).
 - b. Engine size of construction equipment shall be the minimum practical size.
 - c. Minimize the number of construction equipment operating simultaneously through efficient management practices.
 - d. Maintain construction equipment in tune per manufacturer's specifications.

- e. Equip construction equipment onsite with two to four degree engine retard or pre-combustion chamber engines.
 - f. Install catalytic converters on gasoline-powered equipment.
 - g. Install diesel catalytic converters.
 - h. Replace diesel-powered equipment with electric equipment.
 - i. Minimize construction worker trips by requiring carpooling and by providing lunch or by requiring workers to bring lunch to the site.
14. The haul route(s) for all construction-related trucks, three tons or more, entering or exiting the site, shall be approved by the City Transportation Planning Manager.
 15. Construction trips shall be routed to minimize trips through the Fairview/Hollister Avenue intersection during morning and evening peak hours (7:00 a.m. to 9:00 a.m. and 4:00 to 6:00 p.m.) to minimize impacts during commute periods (*Required Mitigation Measure 3.23-11*).
 16. Construction truck (large hauling trucks) trips shall not be scheduled during morning and evening peak hours (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.) to minimize impacts during commute periods (*Required Mitigation Measure 3.23-12*).
 17. On-site storage shall be provided for construction materials and equipment in a location subject to approval by the City Transportation Planning Manager (*Required Mitigation Measure 3.23-13*).
 18. Free parking spaces for construction workers shall be provided in an on-site or off-site location subject to approval by the City Transportation Planning Manager (*Required Mitigation Measure 3.23-14*).
 19. In the event onsite contamination is detected during construction, after following the initial actions specified in the Construction Contingency Plan, a project-specific remediation plan shall be developed and implemented to reduce contaminant concentrations to acceptable levels. The details of the plan would be dependent on the extent and types of contamination but shall include characterization of the problem, review of remedial options (i.e., feasibility study), and a detailed plan for implementation of the chosen alternative. These shall require review and approval by the County Environmental Health Services Division and Airport

- Staff, taking into account potential flooding impacts and prevention of contaminant runoff into nearby creeks. Excavation and any other remediation activities necessary shall be consistent with all biology, air quality (dust suppression), archaeology, and other mitigation measures applicable to the project (*Required Mitigation Measure 3.6-2*).
20. All grading and drainage plans submitted for a building permit, the WQMP and the Construction Phase Erosion Control and Polluted Runoff Control Plans shall include measures to prevent erosion and sedimentation into storm drains that empty into Goleta Slough during both construction and operational phases of project consistent with Airport and Goleta Slough Local Coastal Program Policies C-12, C-13 and C-14 (*Required Mitigation Measure 3.15-2*).
 21. Refueling and equipment maintenance shall be conducted in controlled areas where potential spills can be managed without affecting surface or groundwater quality. Fuels and oils shall be stored in appropriately sealed containers. The staging area used for the storage of these materials shall be lined and surrounded by protective dikes to provide full containment of any spilled materials (*Required Mitigation Measure 3.6-3*).
 22. During construction within existing creek channels, the normal flows of the channel shall be routed around construction areas until all concrete structures shall have adequate time to cure and are clear of toxic materials. To minimize potential dewatering required during construction of new channels, construction plans and specifications shall be designed so that the existing channels shall be maintained in operation as long as feasible during construction of the new channel (*Required Mitigation Measure 3.7-2*).
 23. Prior to any ground disturbing activity, temporary fencing shall be installed adjacent to wetlands in the vicinity of the construction zone to provide protection from construction activities. A City-qualified biologist shall inspect the proposed construction fencing to ensure preservation of wetland areas (*Required Mitigation Measure 3.10-4*).
 24. The stockpiling of soil and construction materials, and haul routes for heavy equipment shall be confined to designated areas shown on grading plans (*Required Mitigation Measure 3.10-5*).

25. Prior to any ground disturbing activity, native wetland plants and wetland topsoil that is weed-free shall be salvaged from impact areas for use in revegetation. The project biologist shall select these areas and they shall be depicted in the Final Wetland and Upland Mitigation, Restoration, Management, Maintenance and Monitoring Plan and on grading plans, along with locations and methods for temporary safe storage of materials (*Required Mitigation Measure 3.10-6*).
26. Construction plans submitted for building permits shall include methods to: (1) avoid the bird nesting and breeding season from mid-March to the end of June consistent with the requirements of Airport and Goleta Slough Local Coastal Program Policy C-16; (2) minimize compaction of soils during the wet season; and (3) minimize erosion from bare areas into adjacent waters and wetlands (*Required Mitigation Measure 3.10-7*).
27. Areas disturbed by construction shall be graded to encourage development of a water regime similar to the one that existed before disturbance (*Required Mitigation Measure 3.10-8*).
28. Palustrine wetlands, including wetland grasslands and seasonal wetlands shall be recreated as described in the Draft Final Wetland Mitigation Plan dated October 2001 and the Addendum dated May 2003 and consistent with Airport and Goleta Slough Local Coastal Program C-11 (*Required Mitigation Measure 3.10-9*).
29. As additional mitigation for the loss of wetland and native upland vegetation, the levees along Tecolotito Creek shall be restored to native seasonal wetlands by removing dense stands of non-native mustard, and replacing the mustard with native herbaceous and shrub species common to the Slough. Approximately 12.7 acres of these levees shall be restored or as required by Airport and Goleta Slough Local Coastal Program Policy C-11, whichever is greater (*Required Mitigation Measure 3.10-10*).
30. Excavation, stabilization, and initial revegetation (focusing on upper-tidal marsh species) of the realigned stream channel shall be completed prior to connecting it to the existing channel. This activity would be followed by gradually closing off and filling the necessary parts of the existing channel so that the hydraulic connection between the upper and lower parts of the stream is uninterrupted (*Required Mitigation Measure 3.10-11*).

31. All mitigation measures identified in Section 3.10 of the Final Aviation Facilities Plan EIR/EIS, specifically the reestablishment of bands of tidal marsh along creek banks, and the restoration and enhancement of remnant or poorly flushed tidal wetlands, and the requirements of Airport and Goleta Slough Local Coastal Program Policy C-16, shall be incorporated into the project design to reduce impacts to Belding's savannah sparrow. The use of restored or enhanced wetlands by Belding's savannah sparrows shall be monitored, before and after mitigations are implemented consistent with Policy C-16. This monitoring shall be combined with appropriate surveys to firmly establish the status of this species and facilitate future land use and ecosystem management decisions. Monitoring shall continue for five years following construction (*Required Mitigation Measure 3.11-1*).
32. The project design and limits of construction activities identified on the construction plans submitted for building permits shall minimize habitat loss and disturbance in the diked basin that supports Coulter's goldfields and Frost's tiger beetle. To minimize the possibility of local extinction of Coulter's goldfields through direct or indirect project effects, the Airport shall, with the assistance of a qualified botanist, continue to collect small amounts of seed from this population and establish new populations elsewhere in the Goleta Slough ecosystem where similar habitat conditions are replicated (*Required Mitigation Measure 3.11-2*).
33. Impacts on southern tarplant, horned seablite, and giant horsetail shall be mitigated through species-specific salvage (horsetail only) or seed collection efforts in impacted areas prior to initiation of construction activities, and the use of this material in revegetation of disturbed areas and new creek alignments. Restoration and enhancement measures described in Section 3.10 of the Final Aviation Facilities Plan EIS/EIR also provide areas of habitat that are suitable for expanding the ranges of southern tarplant and horned seablite. These restoration and enhancement measures shall be specified in the Final Wetland and Upland Mitigation, Restoration, Management, Maintenance and Monitoring Plan for the project.

Mitigation requirements for these species shall be defined in the Final Wetland and Upland Mitigation, Restoration, Management, Maintenance and Monitoring Plan as the successful reestablishment of these plants in numbers and area occupied that are identical to those eliminated by

project construction, based on a pre-construction survey
(*Required Mitigation Measure 3.11-3*).

34. A Letter of Map Revision (LOMR) shall be obtained from the Federal Emergency Management Agency (FEMA), which verifies that the finished work is in conformance with the Conditional Letter of Map Revision (CLOMR). The Airport Department shall have the FIRM Map and National Flood Insurance Floodway Maps revised to reflect the LOMR (*Required Mitigation Measure 3.13-1*).
35. Public educational and recreational enhancement opportunities at the Goleta Slough shall be incorporated into the project design, including, but not limited to:
 - a. Development of an interpretive facility and Slough viewing overlook to be located near the intersection of William Moffett Place and Sandspit Road, which shall include interpretive signs and displays, viewing area and landscaping with native Goleta Slough plant species;
 - b. Trails and trail enhancements and interpretive signs to be located in the upland portions of Wetland Restoration Area I as depicted in Exhibit 7D of the Aviation Facilities Plan. Access to Area I would be granted to educational organizations at the discretion of the Airport Director consistent with the Access Procedures for the Goleta Slough provided in the Airport and Goleta Slough Local Coastal Program Phase III Implementation Package. All trails and trail enhancements shall be consistent with wetland restoration activities proposed for Area I in the Final Wetland and Upland Mitigation, Restoration, Management, Maintenance and Monitoring Plan for the project.
 - c. Establishment of a quarterly Goleta Slough guided tour to be conducted within dry land areas of the Slough and guided by individuals with knowledge of the Goleta Slough ecosystem. The tour shall be available to educational groups and the public through an advance reservation system. The tour shall be advertised on the City and Airport websites and other media. The tour shall be conducted in accordance with all Transportation Security Administration (TSA) and Airport policies and regulations with respect to airport security. Policies for administration of the tour, including the maximum number of attendees, tour routes and activities, security measures and

transportation arrangements shall be at the discretion of the Airport Director and shall be consistent with the requirements of the Access Procedures for the Goleta Slough provided in the Airport and Goleta Slough Local Coastal Program Phase III Implementation Package.

- 36. The plans shall incorporate removal of the existing aircraft holding bays located on Taxiways A and H at the east end of Runway 7-25 and relocation to serve the taxiways at the new threshold for Runway 7-25 as a result of the runway relocation.
 - 37. The former high explosives magazine (existing Building 325) shall be retained in its present location unless the Federal Aviation Administration deems that the building presents a safety hazard to aircraft.
- I. All Planning Commission Conditions of Approval shall be provided on a full size drawing sheet as part of the drawing sets. 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.

- J. Prior to issuance of the Certificate of Occupancy, the Airport shall complete the following:
- 1. Repair any damaged public improvements (curbs, gutters, sidewalks, etc.) subject to the review and approval of the Public Works Department.
 - 2. Improvements as shown on the building plans.

- K. Restored habitats and reference control sites shall be monitored annually for five years after construction or for the period specified in the Final Wetland and Upland Mitigation, Restoration, Management, Maintenance and Monitoring Plan as required by Airport and Goleta Slough Local Coastal Program Policy C-11, whichever is greater, to determine the success of mitigation. Any additional measures necessary to meet original mitigation requirements shall be consistent with recommendations of the Goleta Slough Ecosystem Management Plan (*Required Mitigation Measure 3.10-3*).
- L. The use of restored or enhanced wetlands by Belding's savannah sparrows shall be monitored, before and after mitigations are implemented consistent with Policy C-16. This monitoring shall be combined with appropriate surveys to firmly establish the status of this species and facilitate future land use and ecosystem management decisions. Monitoring shall continue for five years following construction or for the period required by the Final Wetland and Upland Mitigation, Restoration, Management, Maintenance and Monitoring Plan, whichever is greater (*Required Mitigation Measure 3.11-1*).
- M. The Airport shall continue to clear debris and sediment from runways and taxiways after major storm events. The Airport shall also continue to regularly inspect and as needed, clear culverts. (*Required Mitigation Measure 3.13-2*).
- N. The Airport shall continue to participate in and support the goals of the Goleta Slough Management Committee (GSMC). The Airport shall on a regular basis provide for review and comment by the Committee, baseline studies and reports on project construction, mitigation implementation, and mitigation monitoring, including water quality monitoring associated with National Pollution Discharge Elimination System (NPDES) permits (*Required Mitigation Measure 3.10-1*).

NOTICE OF GOLETA SLOUGH RESERVE COASTAL DEVELOPMENT PERMIT

TIME LIMITS:

The Planning Commission's action approving the Goleta Slough Reserve Coastal Development Permit shall expire two (2) years from the date of approval, per SBMC 28.45.009.q, unless:

1. Otherwise explicitly modified by conditions of approval of the development permit, or unless construction or use of the development has commenced.

2. A building permit for the work authorized by the coastal development permit is issued prior to the expiration date of the approval.
3. A one (1) year time extension may be granted by the Planning Commission if the construction authorized by the permit is being diligently pursued to completion and issuance of a Certificate of Occupancy. Not more than three (3) extensions may be granted.

RESOLUTION NO. 03-072

STATE OF CALIFORNIA)
)
COUNTY OF SANTA BARBARA) ss.
)
CITY OF SANTA BARBARA)

I HEREBY CERTIFY that the foregoing Resolution No. 03-072 was adopted by the City Council of the City of Santa Barbara at a meeting held on July 15, 2003, by the following roll call vote:

AYES: Councilmembers H. P. Fairly, Iya G. Falcone, Babatunde Fodayemi, Gregg A. Hart, Roger L. Horton, Dan B. Secord, Mayor Marty Blum

NOES: None

ABSENT: None

ABSTENTIONS: None

IN WITNESS WHEREOF, I have hereto set my hand and affixed the official seal of the City of Santa Barbara on July 15, 2003.



Mabi Covarrubias Plisky
Mabi Covarrubias Plisky, CMC
City Clerk Services Manager

I HEREBY APPROVE the foregoing Resolution on July 15, 2003.

Marty Blum
Marty Blum
Mayor

EXHIBIT NO. 4
APPLICATION NO.
4-03-082

**Update to the October 2001 Wetland Mitigation Plan
& April 2002 Upland Mitigation Plan
for the Airfield Safety Projects, Santa Barbara Airport**

**URS Corporation
May 10, 2003**

BACKGROUND

URS Corporation (URS) prepared a Conceptual Wetland Mitigation Plan (dated October 2001) for the Santa Barbara Airport (Airport) for the Airfield Safety Project (ASP). The Plan described the impacts to wetlands, as defined under the Coastal Act, 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 Carneros creeks. URS also prepared an Upland Habitat Mitigation Plan dated April 2002 to offset impacts to upland habitats due to the ASP.

Both plans were approved by the California Coastal Commission (CCC) in April 2002 as part of the consistency determination issued for the project. The determination included a requirement for the Airport to provide additional wetland mitigation and a detailed wetland restoration plan prior to issuance of a Coastal Development Permit by the CCC. The final restoration plan with the additional wetland restoration areas would be submitted to the CCC for approval.

URS has completed 30 percent design of the ASP, including the upland and wetland restoration areas. A summary of the restoration areas, proposed restoration actions, and acreage is provided in Table 1. The locations of the restoration areas are shown on the attached figure.

CCC MITIGATION REQUIREMENTS

In November 2002, the CCC approved amendments to the Airport Local Coastal Program (LCP), several of which addressed the wetland mitigation requirements for the ASP. Key requirements are as follows:

- The required mitigation ratios for the estimated 13.30 acres of permanent wetland and 10.87 acres of permanent upland impacts associated with the Airfield Safety Projects shall be as follows: (1) seasonal wetlands - 4:1; (2) creeks and open channels - 2:1; and (3) upland habitats - 1:1.
- The Airport must implement the proposed seasonal wetland habitat restoration described in the October 2001 Plan, which is based on a 3:1 replacement ratio prior to or concurrently with development of the ASP.
- The Airport shall continue to examine the feasibility of implementing tidal restoration in Goleta Slough as a means of meeting the full 4:1 seasonal wetland mitigation ratio requirement.
- Within five years of issuance of the CDP, the Airport shall present all documentation, findings and conclusions relative to ongoing tidal restoration studies for review by the CCC. If the evidence

demonstrates that tidal restoration is infeasible due to safety concerns, and/or the tidal restoration experiment or project is terminated at any point subsequent to implementation of an approved tidal restoration plan, the Airport shall restore 13.30 acres of non-tidal seasonal wetlands to achieve the full 4:1 wetland mitigation requirement. Off-site mitigation measures shall only be approved should it not be feasible to fully mitigate impacts on-site.

- If it is determined that tidal restoration is feasible and a long-term restoration project is approved by involved agencies, the Airport shall provide 13.30 acres of the required ASP wetland mitigation as part of a future, long-term project to restore tidal circulation to portions of Goleta Slough.

PROPOSED RESTORATION ACREAGE

During the preparation of the preliminary design, the boundaries of the proposed restoration areas were slightly modified. As a result, the acreage of the proposed wetland mitigation has increased from 26.5 acres in the October 2001 mitigation plan, to 35.5 acres, resulting in a 4:1 wetland restoration replacement ratio (see Table 1). The acreage increased for the following reasons:

- The acreage of wetland restoration and enhancement along the berms to Tecolotito Creek increased from 12.7 to 15.7 acres because a 25-foot wide zone was added to the margins of the berm restoration area for removal of exotic species.
- The acreage of wetland restoration at Area R-2 increased from 2.2 to 4.5 acres because a larger area of existing uplands will be converted to wetlands than under the October 2001 plan.
- The acreage of wetland restoration and enhancement at Area I increased from 11.6 to 15.3 acres due to more ambitious plan to grade and establish seasonal wetlands than previously proposed.

At this time, it appears that up to 35.5 acres of wetland restoration and enhancement are available for mitigating seasonal wetland impacts of the ASP. This acreage will be refined during final design, and will likely be slightly less. To the extent that the wetland restoration acreage exceeds the original 3:1 ratio, the additional acreage would be applied to the CCC requirement for a 4:1 wetland replacement ratio.

Any shortfall in the 4:1 replacement acreage would be pursued in a future under a tidal restoration program, as described in the CCC requirements. In the event that tidal restoration is not available to the Airport five years after issuance of the CDP, the Airport will provide mitigation for the remaining acreage in an area north of Carneros Creek, as shown on the attached figure.

The acreages of wetland mitigation for tidal habitats and for upland habitats (see Table 1) have not changed from the October 2001 and April 2002 plans, respectively.

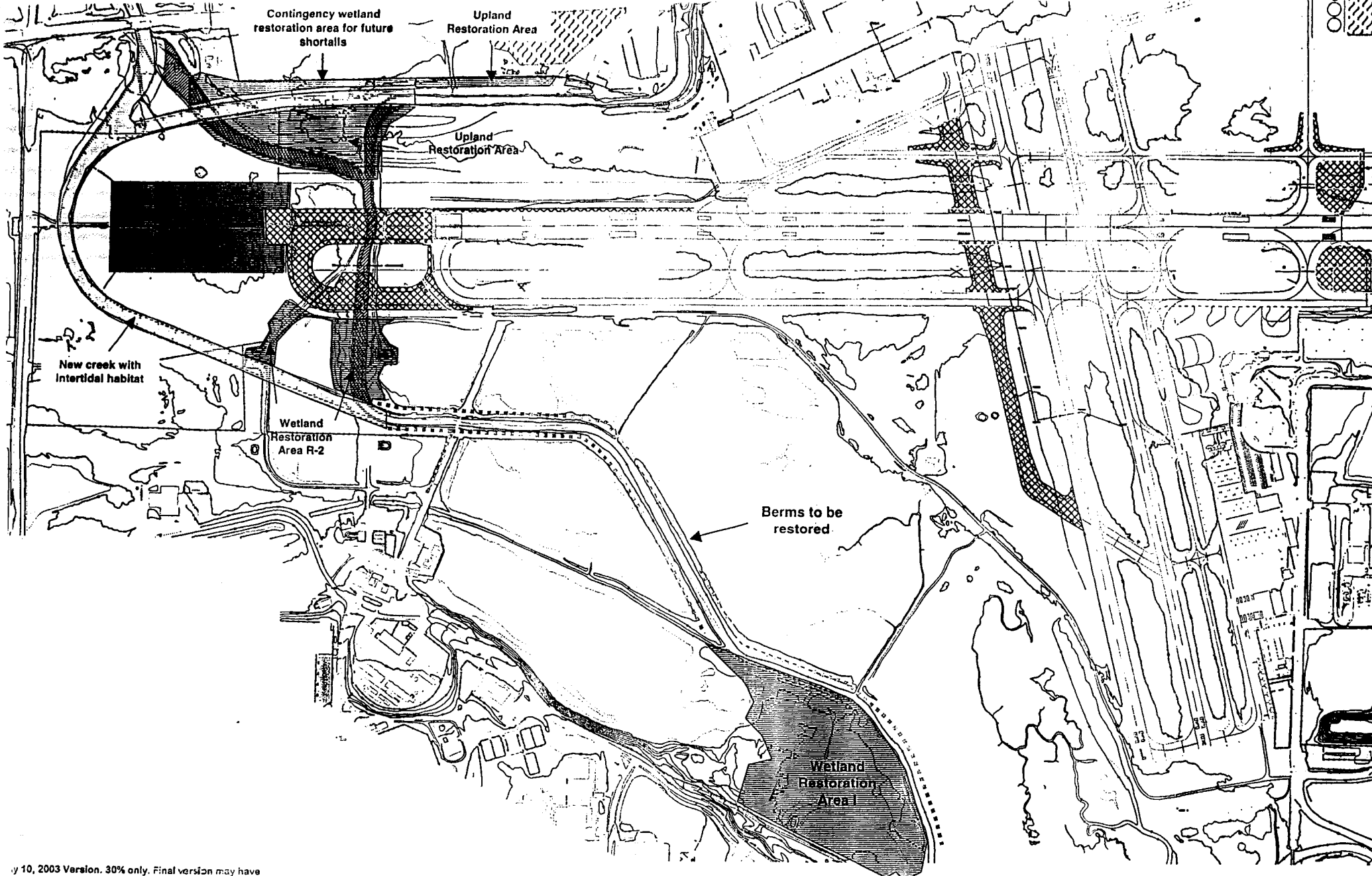
**TABLE 1
SUMMARY OF WETLAND AND UPLAND HABITAT RESTORATION ACREAGE**

Restoration Action	Location	Type of Wetland	Acres*
<i>Direct Mitigation for Non-Tidal Wetlands</i>			
Create and enhance new seasonal wetlands. Two treatments: Berm restoration (8.3 acres) and wetland enhancement on berm margins (7.4 acres).	On berms next to Tecolotito Ck and tidal salt marsh	Non-tidal low-growing wetland herbs, grasses, & shrubs; palustrine persistent emergent wetlands.	15.7 [12.7]
Create new seasonal wetlands in upland areas.	In Area R-2. Includes filling Tecolotito Creek, removing berms, and removing three structures	Non-tidal low-growing wetland herbs and grasses; palustrine persistent emergent wetlands. Two seasonal wetland types to be created in two different moisture regimes.	4.5 [2.2]
Create new seasonal wetlands	In Area I, amongst uplands and adjacent to tidal marsh	Non-tidal low-growing wetland herbs and grasses; palustrine persistent emergent wetlands	9.8 [9.0]
Enhance existing seasonal wetlands	In Area I, in mosaic of uplands and wetlands	Non-tidal low-growing wetland herbs and grasses; palustrine persistent emergent wetlands.	5.5 [2.6]
Total mitigation acreage for non-tidal wetland impacts			35.5 [26.5]
Mitigation ratio (based on 8.68 acres of impact)			4:1 [3:1]

<i>Direct Mitigation for Tidal Wetlands</i>			
Create new tidal open water and mudflat habitats	New channels for Tecolotito and Carneros Cks	Estuarine intertidal aquatic bed and unconsolidated bottom, and non-tidal wetlands on upper banks	9.3
Total mitigation acreage for tidal wetland impacts			9.3
Mitigation ratio (based on 4.62 acres of impact)			2:1

<i>Upland Mitigation</i>			
Create grassland and scrub habitat	Upland restoration areas (two areas)	Naturalized grassland and native scrub habitat	8.6
Create grassland habitat	Convert wetlands in the new RSA to uplands	Naturalized grassland and native scrub habitat	3.4
Total mitigation acreage for upland impacts			12.0
Mitigation ratio (based on 10.87 acres of impact)			1:1

* Based on preliminary grading plans (30% design level). Acreage may change with new topographic maps and results of geotechnical investigations in June 2003. Values from the October 2001 mitigation report are shown in [brackets].



July 10, 2003 Version. 30% only. Final version may have modified boundaries based on new topographic maps.

DESCRIPTION	DATE	APPROVED
REVISIONS		

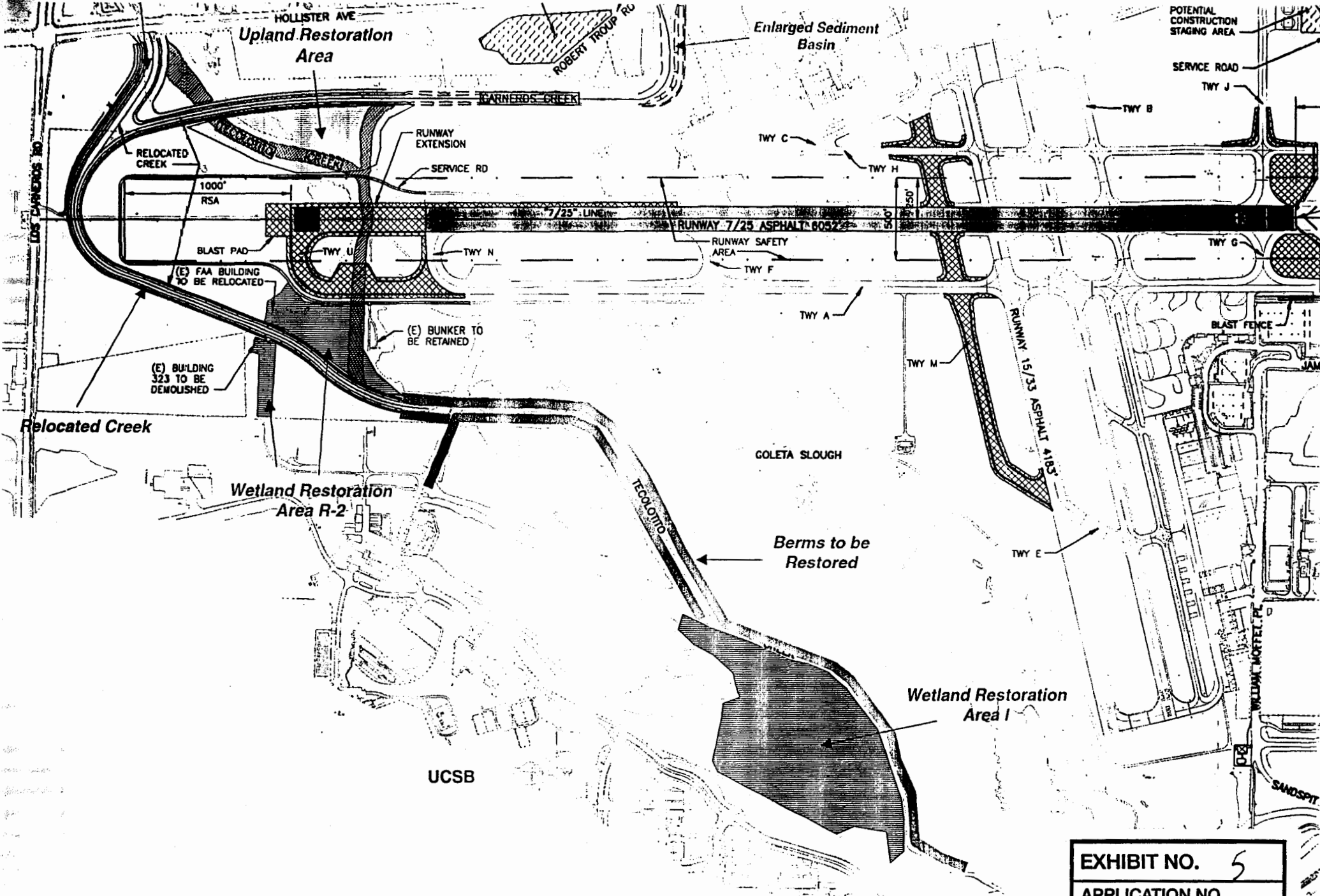
URS
 130 ROBIN HILL ROAD, SUITE 100
 SANTA BARBARA, CA 93117
 PHONE: (805) 964-8010
 FAX: (805) 964-0259

DESIGN _____ CHECKED _____
 C.D. _____
 PROJECT ENGINEER _____ DATE: _____
 R.C.E. _____ (D.P., EXP., DATE)
 DRAWING FILE: _____

CITY OF SANTA BARBARA
 SANTA BARBARA MUNICIPAL AIRPORT
 SANTA BARBARA, CALIFORNIA
 AIRPORT SAFETY PROJECT
 WETLANDS RESTORATION

CITY OF SANTA BARBARA
 PUBLIC WORKS DEPARTMENT-ENGINEERING DIVISION
 APPROVED: _____ DATE: _____
 CITY ENGINEER _____

SCALE:
 VERT. _____
 HOR. _____
 ARCH. NO. _____



REVISIONS	DATE	APPROVED

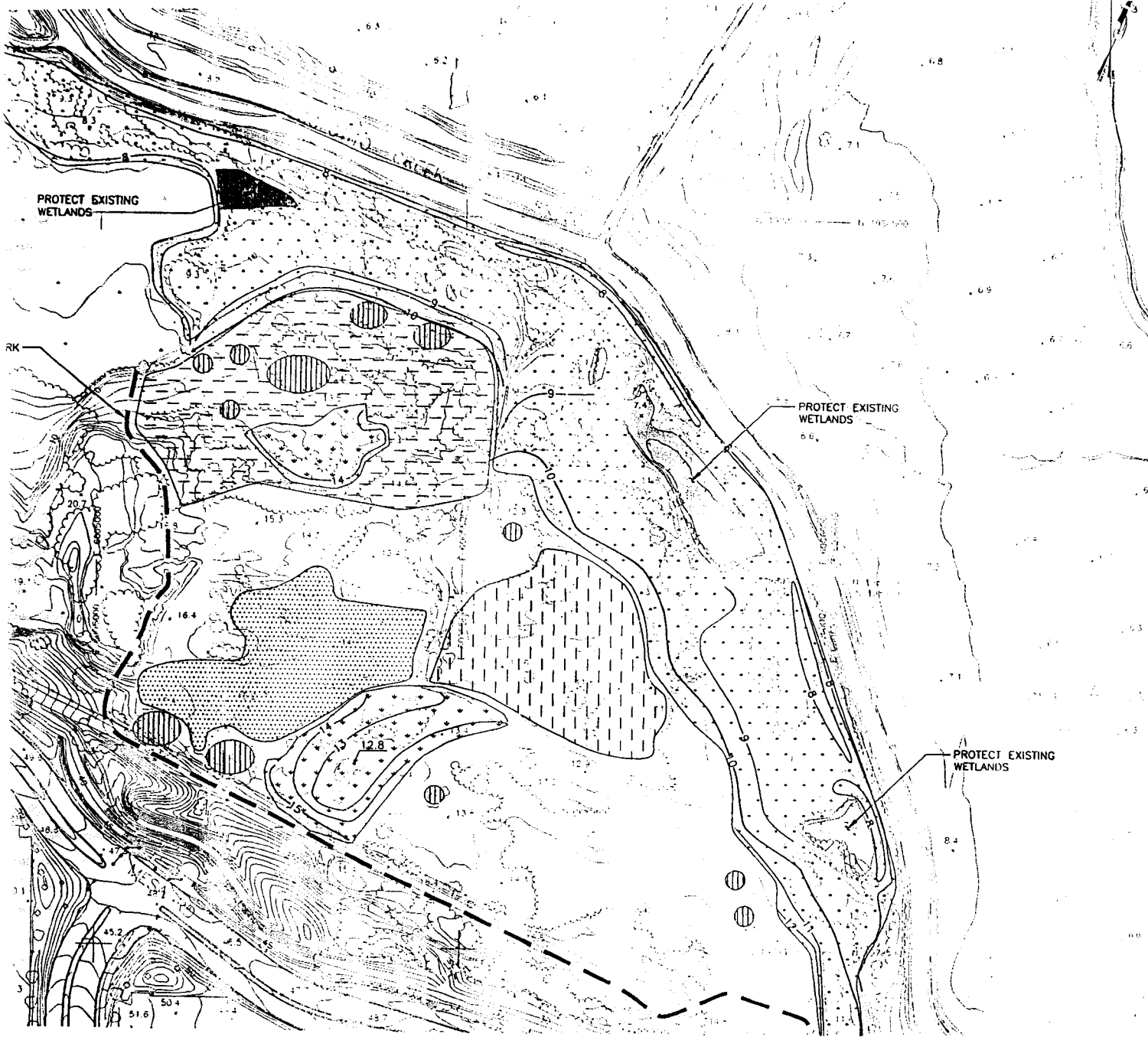
URS
 130 ROBIN HILL ROAD, SUITE 100
 SANTA BARBARA, CA 93117
 PHONE: (805) 984-6010
 FAX: (805) 984-0258

DESIGN: SD _____ CHECKED: JS _____
 CAD: CC _____
 RF: _____ DATE: _____
 PROJECT ENGINEER: _____ R.C.E. (EXP. _____)
 DRAWING FILE: _____

CITY OF SANTA BARBARA
 SANTA BARBARA MUNICIPAL AIRPORT
 SANTA BARBARA, CALIFORNIA
 Overview of the Airport Safety Projects and Restoration Sites

EXHIBIT NO. 5
 APPLICATION NO.
 4-03-082

RA
 7/51C



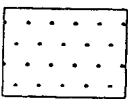
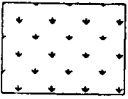
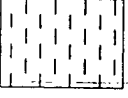
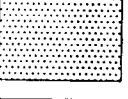
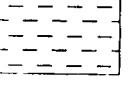

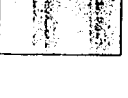
LEGEND	
	TREATMENT 1 SEASONAL AND TRANSITIONAL WETLAND CREATION ALONG SLOUGH MARGINS
	TREATMENT 2 INLAND SEASONAL WETLAND CREATION
	TREATMENT 3 PAMPAS GRASS REMOVAL AND WET GRASSLAND ENHANCEMENT
	TREATMENT 4 WET MEADOW ENHANCEMENT
	TREATMENT 5 REMOVE POISON OAK
	TREATMENT 6 REMOVE NONNATIVE TREES (NOT ALL SHOWN)
	TREATMENT 7 PROTECT EXISTING WETLANDS
NOT MAPPED	TREATMENT 8 REMOVE OLD STOCKPILES AND RUBBLE THROUGHOUT THE SITE
NOT MAPPED	TREATMENT 9 REMOVE NOXIOUS WEEDS THROUGHOUT THE SITE

EXHIBIT NO. 6
APPLICATION NO.
4-03-082

URS

130 ROBIN HILL ROAD, SUITE 10C
 SANTA BARBARA, CA 93117
 PHONE: (805) 964-6010
 FAX: (805) 964-0259

DESIGN: JG _____ CHECKED: _____
 CAD: GC _____
 RF _____ DATE: _____
 PROJECT ENGINEER
 R.C.E. (EXP) _____
 DRAWING FILE: _____

CITY OF SANTA BARBARA
 SANTA BARBARA MUNICIPAL AIRPORT
 SANTA BARBARA, CALIFORNIA
 AIRPORT SAFETY PROJECT
 Revegetation Plan for Area I

CITY OF SANTA BARBARA
 PUBLIC WORKS DEPARTMENT-ENGINEERING DIVISION
 APPROVED: _____ DATE: _____
 CITY ENGINEER

CITY OF SANTA BARBARA



SANT.

EXHIBIT NO. 7

APPLICATION NO.

4-03-082

AIRPORT DIRECTOR

RECEIVED

AUG 14 2003

(805) 967-7111
FAX (805) 964-1380

August 14, 2003

Gary Timm, District Manager
California Coastal Commission – South Central Coast District
89 S. California Street, Suite 200
Ventura, CA 93001

CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

SUBJECT: APPLICATION FOR CDP FOR AIRFIELD SAFETY PROJECTS AT THE SANTA BARBARA AIRPORT

Dear Mr. Timm:

The City of Santa Barbara Airport Department is seeking approval of a Coastal Development Permit (CDP) pursuant to Santa Barbara Municipal Code §28.45.009(p.) for the Airfield Safety Projects. The Airfield Safety Projects include construction of new runway safety areas (RSAs) for the Airport's main runway (Runway 7-25), runway relocation, creek relocation, new taxiways and service roads, wetland enhancement, runway pavement maintenance, gas line relocation, and drainage, signage and electrical improvements.

In December 2001, the City adopted the Aviation Facilities Plan (AFP), which addresses aviation and other uses for the 15-year period through 2015 on the southern 727 acres of the Santa Barbara Airport property, which encompasses the airfield and Goleta Slough. The Airfield Safety Projects are a recommended component of the AFP and are needed to improve safety at the Airport. The Airfield Safety Projects would not increase the capacity of the Airport or its runways, nor result in a change in the type of aircraft used. Even if passenger enplanements and aircraft operations were projected to decrease over the next 15 years, these improvements are necessary to increase the safety of any level of aircraft operations. The Airfield Safety Projects are necessary to meet current Federal Aviation Administration (FAA) safety standards and are therefore being undertaken by the City as the first priority.

On April 9, 2002, the California Coastal Commission, acting pursuant to the Federal Coastal Zone Management Act, voted to concur with the Airport's Federal Consistency Certification for the Aviation Facilities Plan, including the Airfield Safety Projects. On December 10, 2002, the California Coastal Commission unanimously certified an amendment to the Airport and Goleta Slough Local Coastal Program including text changes, land use and zoning designation map revisions and other modifications

suggested by the Commission's staff necessary to implement the proposed Airfield Safety Projects. The attached application pertains only to the Airfield Safety Project elements of the AFP.

Since approval of the LCP amendment, the Airport has obtained up-to-date topographic information and further developed the engineering design of the Airfield Safety Projects. On June 19, 2003, the City Planning Commission approved a Goleta Slough Reserve (G-S-R) Zone Coastal Development Permit pursuant to SBMC §29.25.020(A.) for the portion of the project in the G-S-R Zone that is located in the appealable jurisdiction of the Coastal Zone and made recommendations to the California Coastal Commission for approval of a Coastal Development Permit (Attachment 12). The Planning Commission's approval of the G-S-R Zone CDP was appealed to the City Council by the City of Goleta. On July 15, 2003, the City Council denied the appeal and upheld the Planning Commission's decision. The City Council adopted findings and a number of conditions of approval for the project in Resolution 03-072 (Attachment 13). A Notice of Final Action was filed with the Coastal Commission on July 16, 2003. As you are aware, the City Council's decision was appealed to the Coastal Commission by the City of Goleta and Santa Barbara Channelkeeper on July 30, 2003.

The Airfield Safety Projects include:

- Construction of new Runway Safety Areas (RSAs) measuring 1,000 feet long by 500 feet wide at either end of the main runway (Runway 7-25) to meet Federal Aviation Administration (FAA) standards;
- Shifting Runway 7-25 by 800 feet to the west to accommodate construction of the new RSAs while maintaining the existing runway length of 6,052 feet;
- Constructing standard RSAs along the sides of the shifted runway segment;
- Relocation of Cameros and Tecolotito Creeks approximately 1,800 feet to the west to accommodate construction of the new RSAs and the runway shift;
- Extension of existing Taxiway A by 800 feet to parallel to Runway 7-25 to accommodate the relocation of Runway 7-25;
- Relocation and extension of the gravel West Service Road around the west end of the new RSA to accommodate the relocation of Runway 7-25;
- Eastern taxiway improvements including relocation of two aircraft holding bays to accommodate operational changes associated with the shift of Runway 7-25;
- Construction of new Taxiway M;
- Relocation of the East Service Road;
- Grading and drainage improvements; and
- Wetland mitigation and enhancement involving approximately 42 acres of non-tidal seasonal and tidally influenced wetlands.

Grading for creek relocation, runway relocation, and new runway safety areas, taxiways, service roads and mitigation equals about 174,300 cubic yards of cut and 83,500 cubic yards of fill for a total of 257,800 cubic yards of grading. A portion of the excess cut would be used to fill the existing creek channels. The Airport will require that the

Contractor locate an acceptable offsite disposal location outside of the Coastal Zone, and if necessary, obtain permits for removal of the excess 90,800 cubic yards of fill. Tables 1 and 2 below provide a breakdown of the proposed grading and paving quantities.

Table 1- Estimated Grading Quantities

Description	Cut (Cubic Yards)	Fill (Cubic Yards)
Runways and Taxiways		
West End RW 7-25 Relocation and Shoulders	9,000	
Blast Pad	2,000	
Taxiway A Extension & Shoulders	9,200	
Taxiway H & Shoulders	1,100	
Taxiway J & Shoulders	3,200	
New Taxiway M & Shoulders	13,000	
Runway 25 Holding Bays	7,800	
Runway and taxiway subtotal	45,300	
RSA and Creek Relocation		
West End RSA Grading	14,500	
Relocated Creeks (including over-excavation of existing creek channels)	50,500	
Relocated Creek Berms		11,500
Tecolotito Sedimentation Basin	11,000	
Carneros Sedimentation Basin	11,000	
Fill Existing Creek Channels		62,000
Fill due to over-excavation of unsuitable material in existing creeks		10,000
RSA and Creek Relocation subtotal	87,000	83,500
Wetland and Upland Mitigation		
Upland Restoration site	6,000	
Area R-2	13,000	
Area I	16,000	
Berms	7,000	
Wetland and Upland Mitigation Subtotal	42,000	
Total Estimated Cut	132,300	
Total Estimated Fill	174,300	83,500
Total Estimated Export	90,800	

Table 2 – Estimated New Paving

Description	Square Feet (SF)
RW 7-25 Relocation to west including shoulders and blast pad	265,500
Taxiway A extension and holding bay	148,500
Relocated east holding bays (2)	168,900
Taxiway H, and J fillets and shoulders	40,500
Taxiway M	288,000
East Service Road Extension	32,400
Blast pad at east end of Runway 7-25	<40,200>
Holding bays at east end of Runway 7-25	<43,500>
Total New Paving	860,100 (19.73 acres)

Runway Safety Areas

Development of conforming RSAs has been a goal of Santa Barbara Airport since the safety need was first identified by the FAA as part of the Draft Master Plan Update in 1992. To meet current Federal Aviation Administration (FAA) design standards (14 CFR §139.309 and FAA Advisory Circular 150/5300-13, Airport Design, Chapter 3 Runway Design, Paragraph 305) and to improve operational safety, the Airport proposes to extend the Runway Safety Areas (RSAs) on either end of the main runway (Runway 7-25). RSAs are located at each end of a runway and along the edges of the runway itself. The purpose of an RSA at the runway end is to increase safety for an aircraft that may accidentally over-run or under-shoot the runway during take-off or landing. RSAs along the sides of the runway increase safety for an aircraft that accidentally veers off of the paved runway surface. RSAs are typically constructed of a compacted surface that can withstand the occasional passage of an aircraft and, as such, are used only during emergency situations to avoid passenger injury and damage to the aircraft. Safety areas also provide for adequate and immediate access to an accident site for aircraft rescue and firefighting personnel and equipment. The RSA dimensions required by FAA for Runway 7-25 are 500 feet wide by 1,000 feet long at each runway end and 175 feet wide along each side of the runway surface. The existing RSA at the west end of Runway 7-25 is only about 320 feet long, ending at Tecolotito Creek. At the east end, the RSA is presently only 215 feet in length, terminating at San Pedro Creek and Fairview Avenue.

To meet the required 1,000-foot RSA length on the east end of the runway, approximately 800 feet of the existing runway would be converted to RSA and be added to the 215 feet of RSA already provided. The 800 feet of runway that would be converted to RSA would be replaced at the west end of the existing runway. The 800-foot long replacement runway segment would be 150 feet wide with 25-foot wide paved shoulders on each side to match the existing runway dimensions. A 200-foot wide by 150-foot long blast pad would also be provided, similar to the existing blast pad at the western end of Runway 7-25. RSAs would be constructed along both sides of the

reconstructed runway segment and would extend 150 feet north and south of the runway shoulders (for a total RSA width of 500 feet, including the runway surface itself).

The reconstructed runway, shoulders and blast pad would require approximately 11,000 cubic yards of cut and would result in 265,500 square feet of new paving. Construction of new runway edge lights and signage and approximately 2,000 lineal feet of trenching and conduit placement would also be required to relocate the runway. An existing 16-inch Southern California Gas high pressure main would also be relocated to the west so that it would no longer be located under Runway 7-25 or under the future western RSA (Attachment 14). Routine pavement maintenance for Runway 7-25 over its entire length would be also performed by grinding off the top $\frac{3}{4}$ inches of pavement, constructing a 1-1/2 inch asphalt concrete overlay, and cutting $\frac{3}{4}$ inch grooves over its entire length. This work is needed to achieve a high coefficient of friction for the runway surface during wet weather.

At the west end of the relocated runway, a new RSA would be constructed to be 1,000 feet long and 500 feet wide, consistent with FAA standards. Creation of the RSA would require approximately 14,500 cubic yards of cut. After grading, the entire western RSA would be hydro-seeded with a mixture of native upland grasses, which would be periodically mowed to a height of approximately 6 to 8 inches.

With relocation of the runway, the former east end of the runway would serve as both an RSA and as a lead-in taxiway. This lead-in taxiway would provide secondary access to and from the threshold of Runway 25. The lead-in taxiway would allow aircraft to be stored on the adjacent Taxiway A in the event that several aircraft are waiting for release due to inclement weather at their destination airports.

The proposed Runway Safety Area project would not increase the Runway 7-25 runway length of 6,052 feet. Therefore, the RSA project would not increase the capacity of the runway or allow it to accommodate larger aircraft.

Carneros and Tecolotito Creeks Relocation

To accommodate the 800-foot runway relocation and the new 1,000-foot RSA at the west end of the runway, relocation of the currently existing channelized Tecolotito Creek would be required in an alignment approximately 1,800 feet west of its present location. The confluence of Carneros Creek with Tecolotito Creek must also be relocated to the west as part of the project. To relocate the creeks out of the new RSA, new creek channels would be excavated and portions of the existing creek channels would be filled in.

The design of the creek relocation is based on maintaining existing conveyance and allowing for trapping and removal of sediment upstream of Goleta Slough. Carneros Creek would be extended 1,600 feet to its new confluence with Tecolotito Creek, and approximately 350 lineal feet of existing Carneros Creek would be filled. Tecolotito Creek would be extended by approximately 3,000 feet, and about 1,300 feet of the existing creek channel would be filled. The new creek channels would be trapezoidal,

with top of bank widths varying from 65 feet to 100 feet. The new banks would be stabilized with geotextile fabric where necessary and restored with native vegetation.

Berms would be provided along the sides of the channels to maintain the existing capacity of the creek. To maintain a constant slope to the point of reconnection with existing Tecolotito Creek in the southern portion of the Slough, the new creek banks must be bermed to prevent the cross sectional area from becoming smaller than the existing condition. The terrain will become lower as the channel wraps around the proposed RSA; therefore, the berms must increase in height farther down the channel to accommodate the drop in elevation.

The width of the berms provided along the creeks varies, depending on the type of access required in each area. Near the sedimentation basins, the berms must be wide to accommodate County Flood Control District equipment such as cranes, loaders and dump trucks that remove the sediment. Gravel roads are proposed on some of the berms to provide access to and from the sedimentation basins, and to the southeast end of the relocated creek channel.

The Carneros and Tecolotito Creek sedimentation basins would be enlarged from their existing condition to allow more capacity for trapping of silt. The existing Carneros Creek sedimentation basin, located just south of Firestone Road and extending 600 feet to the south, would be widened by 30 feet to 85-90 feet wide in order to increase its capacity to trap silt from 8,000 cubic yards to 11,000 cubic yards. The eastern bank/berm would have a 2:1 slope, and a 30-foot wide access road would be provided on the top. From Firestone Road to its new confluence with Tecolotito Creek, Carneros Creek would be 65 feet wide with 2:1 sloped banks and a 38-foot wide bottom. Each side of the channel would have a berm varying from 0-3.5 feet high. The northern berm would be 18 feet wide with 15 feet wide gravel access road. The southern berm would be 10 feet wide at the top.

The Tecolotito Creek sedimentation basin is currently 80 to 110 feet wide along its 550-foot length. With the proposed project, the sedimentation basin would be constructed to a uniform 100 feet wide and lengthened to 750 feet, reaching from the Hollister Avenue Bridge to its confluence with Carneros Creek. The basin would have 2:1 sloped banks and a 75-foot wide bottom, and its capacity would increase from 10,000 cubic yards to 15,000 cubic yards of silt. Each side of the creek channel would have a berm varying from 0 to 3.5 feet high. Each berm would be 50 feet wide with a 15-foot wide gravel access road.

For 1,800 feet downstream of the confluence with Carneros Creek, Tecolotito Creek would be 65 feet wide at the top with 2:1 side slopes and a 38-foot wide bottom. Each side would have a 10-foot wide berm varying from 0 to 3.5 feet high. The next 860 feet of creek channel section would be similar, except that the southern berm would be 18 feet wide with a 15 feet wide gravel road on the top.

Total grading in coastal waters associated with creek relocation would be 72,500 cubic yards of excavation and 83,500 cubic yards of fill.

Taxiway A Extension

Relocation of Runway 7-25 by 800 feet to the west necessitates an 800-foot extension of the main taxiway that serves the runway (Taxiway A). The extension would include construction of a 75-foot wide by 1,000-foot long taxiway with 25-foot wide paved shoulders on each side. A 230-foot long by 100-foot wide holding bay would also be provided at the end of the taxiway that would allow aircraft to "hold short" of the runway and allow other aircraft to pass, if so directed by the Air Traffic Control Tower. The total grading quantity for the taxiway extension and holding area would be 9,200 cubic yards of cut. This project component would also include construction of taxiway edge lights and signage, which would involve approximately 2,500 lineal feet of trenching and conduit placement.

West Service Road Relocation

A 15-foot wide unpaved gravel service road would be constructed to allow service and fire rescue vehicles to gain access to both sides of the runway without crossing the runway. Construction of the service road would involve grading and placement of aggregate base for a length of 3,500 feet around the west end of the relocated runway.

Eastern Taxiway Improvements

Two aircraft holding bays presently located along Taxiways A and H at the east end of Runway 7-25, would be removed and replaced with two holding bays provided on each side of the taxiways serving the new runway threshold. These holding bays would allow an aircraft to wait for its departure release time without obstructing access by other aircraft to and from the runway threshold. Each holding bay would measure approximately 300 feet wide and 300 feet long. Shoulder improvements to Taxiways H and J are also proposed in this area. Lighting and signage for the taxiways and holding bays would require approximately 10,000 lineal feet of trenching to a depth of 24 inches and conduit placement.

New Taxiway M

Santa Barbara has two north-south runways (Runways 15R-33L and 15L-33R) that are used by most general aviation (GA) aircraft. GA activity accounts for nearly 70 percent of all operations at Santa Barbara Airport. Currently, an aircraft landing to the south on one of these runways must cross up to four active runways to access the northwest ramp area.

A new Taxiway M is proposed to improve aircraft operational safety, especially for GA aircraft. The new Taxiway M would provide a more direct taxi route to the northwest ramp area from the parallel runways that requires only one runway crossing at Runway 7-25. Reducing the number of runway crossings will significantly reduce the risk of runway incursions, which is a paramount FAA safety concern nationwide. A runway

incursion occurs when an aircraft enters a runway without prior permission from the FAA Aircraft Control Tower.

Taxiway M would be constructed as a 50-foot wide taxiway with 20-foot wide paved shoulders for a length of approximately 2,450 feet. Taxiway M would parallel Runway 15R-33L, which is located to its east, and would extend approximately two-thirds the length of the runway, beginning at the northwest ramp and terminating at Taxiway E. The total paved area would be approximately 288,000 square feet. Total grading for Taxiway M would be 13,000 cubic yards of cut.

East Service Road Extension

Airport service and fire rescue vehicles and large aircraft refueling trucks located at both of the Airport's Fixed Base Operator locations must currently drive across the active aircraft ramp at the Ampersand hangar facility on the east end of the airfield to gain access to all portions of the airfield. The Airport proposes to eliminate this condition by constructing a 20-foot wide dedicated service road around the active aircraft ramp, thus eliminating potential aircraft/vehicle conflicts. Extending the east service road would involve placement of 32,400 square feet of aggregate base and asphalt concrete for a distance of 1,600 feet around the Ampersand ramp to connect with the existing east service road.

Grading and Drainage Improvements

A series of new drains and catch basins would be constructed in order to drain water away from the relocated runway and new taxiway areas and to prevent water from ponding. Pipe diameter sizes are estimated to range from 15 inches to 24 inches, with one small section of 36-inch pipe. The pipe network would tie into and extend the existing airfield drainage system, with installation of five new flap gate-type outlets into the new creek channel. Storm drain pollutant interceptors would be installed on all new drain inlets and existing drain inlets that do not already have interceptors would be retrofitted.

Wetland and Upland Mitigation

Based on the wetlands delineation for the project, the project would have a permanent impact on approximately 13.99 acres of wetlands and a temporary impact during construction on 2.25 acres of wetlands. This estimate, which is incorporated in the Final Wetland Mitigation Plan dated July 2003, is 0.69 acres greater than that estimated in the 2001 Conceptual Wetland Mitigation Plan due to precise mapping of wetlands impacts based on more refined preliminary engineering drawings. The mitigation ratios established in LCP Policy C-11 have been applied in the Final Wetland Mitigation Plan (Attachment 15) based on the revised acreage totals.

The Final Wetland Mitigation Plan involves wetland restoration along the relocated creek channels and creation and enhancement of seasonal wetlands in Goleta Slough on existing berms adjacent to Tecolotito Creek and tidal salt marshes, in Area R-2 and in the southern portion of Airport property (Area I). Approximately 32.6 acres of seasonal

wetlands would be restored, and relocation of Carneros and Tecolotito Creeks would result in a net increase of 9.4 acres of creek habitat from the existing condition. The Wetland Mitigation Plan includes active management of restored areas for three years and a minimum of seven years of monitoring. An aggressive weed abatement program is included which would remove a major weed source for much of Goleta Slough. All mitigation is to be accomplished under the direction of a qualified wetlands biologist and would be consistent with the *Draft Goleta Slough Ecosystem Management Plan*, as required by LCP Policy C-10.

During Federal Consistency Certification for the Aviation Facilities Plan in April 2002, the Coastal Commission found that the Wetland Mitigation Plan for the Airfield Safety Projects incorporates acceptable mitigation ratio commitments and locations for impacts related to direct fill of wetlands.

In response to a Coastal Commission requirement for upland mitigation during the Federal Consistency Certification process, and consistent with new LCP Policy C-11, the Upland Mitigation Plan (incorporated into the Wetland Mitigation Plan, Attachment 15) would result in creation of 11.4 acres of higher quality native upland habitat and enhancement and protection of an additional 8 acres of uplands in Goleta Slough to mitigate the loss of 10.87 acres of uplands as a result of the project.

Another important mitigation component is the proposed enlargement of two sediment basins on Tecolotito and Carneros Creeks near Hollister Avenue. Over time, a fine layer of silt is deposited over Goleta Slough during flooding events. This action slowly and incrementally fills in the Slough. Larger basins would capture more sediment, which would be periodically removed by the Santa Barbara County Flood Control District.

Tidal Circulation Experiment

Efforts to restore tidal circulation to portions of Goleta Slough have been proposed on a number of occasions. However, the Federal Aviation Administration (FAA) and the Airport have expressed concerns that restoring tidal circulation to portions of Goleta Slough could modify bird activity near the airfield and possibly increase aviation bird strike hazards. To date, the Airport has not included tidal restoration in any of its mitigation efforts because of this concern. Similarly, Slough restoration projects located outside of the Airport property, including a \$1.3 million Goleta Slough Tidal Restoration Project Enhancement Plan sponsored by the Coastal Conservancy, have been on hold, pending resolution of this issue.

To help resolve this dilemma, the California Coastal Conservancy encouraged the Airport to seek funding from the Conservancy to conduct an experiment that would help determine the causal relationship between bird strikes and a tidally-influenced wetland habitat. In 2001, the Airport requested and received a Southern California Wetlands Recovery Project Grant of \$150,000 from the Coastal Conservancy to prepare a feasibility study for a potential tidal restoration experiment.

A preliminary draft feasibility study was completed by URS Corporation in February 2002. The study characterized baseline conditions by assessing existing bird activity in the area and analyzing the Airport's existing bird strike data. The study also provided an analysis of candidate tidal basins for the field experiment, modeled potential changes in hydrology and habitat in these basins and selected two basins as the recommended alternative for the experiment.

In February 2002, the preliminary draft Feasibility Study was submitted to the U.S. Department of Agriculture (USDA) Wildlife Services Division and the Federal Aviation Administration (FAA) for review. In September, the Airport received concurrence from both agencies allowing the Airport to design, construct and implement the experiment.

The objective of the experiment is to obtain site-specific data that can adequately address the bird strike issue to the satisfaction of the FAA and the Airport. This would be achieved by introduction of tidal action to two of the Airport's basins in Goleta Slough (Basins F and L) and monitoring the results for up to three years, with monitoring focused primarily on bird use. Control basins would also be monitored.

A key component of the experiment, and required by the FAA, will be that if at any time the monitoring data indicates that the tidal circulation has caused an increase in bird strike hazard, the experiment will be immediately halted and the basin(s) will be returned to former conditions (i.e. non-tidal).

On October 31, 2002, the City received an additional \$148,000 grant from the Coastal Conservancy to finalize the feasibility study, complete environmental review and permit processes and prepare final design plans for the experiment. The Airport has contracted with URS Corporation for completion of the feasibility study, environmental review assistance, permitting support and design services.

During certification of the LCP Amendment, the Coastal Commission included policy modifications, including new Policy C-11, which provides specific mitigation requirements for the Airfield Safety Projects, including a required 4:1 replacement ratio for impacts to seasonal wetlands, 2:1 replacement of creeks and open channels and 1:1 replacement of upland habitats. Policy C-11 requires the City to undertake a Goleta Slough Tidal Restoration experiment and present all documentation, findings and conclusions relative to tidal restoration to the Coastal Commission within five years of issuance of the Coastal Development Permit for the Airfield Safety Projects. In the event that the evidence demonstrates that tidal restoration will not significantly and adversely increase the potential for aircraft bird strikes, Policy C-11 requires the City to provide wetland mitigation in addition to that specified in the 2001 Conceptual Wetland Mitigation Plan through a long-term project to restore tidal circulation to portions of Goleta Slough. If the experiment determines that tidal restoration mitigation is infeasible, the City will provide additional in-kind seasonal wetland mitigation within Goleta Slough to meet the 4:1 requirement for seasonal wetlands replacement.

The tidal circulation experiment is currently in the design phase and an application to the California Coastal Commission for a Coastal Development Permit will be submitted this fall. Construction of the experiment is scheduled for summer 2004.

Tree Removal

The only tree removals would be associated with implementation of the Wetland Mitigation Plan in Area I to accomplish wetland restoration. The following trees would be removed: 2 large eucalyptus, 3 Canary island pine trees, one juniper, one cypress, and 16 myoporum trees. All of the trees to be removed are non-native species.

Water Quality

Section 30231 of the Coastal Act requires maintaining water quality control of runoff, preventing substantial interference with surface water flow, and maintaining natural vegetation buffers that protect riparian habitat and minimizing alterations of natural streams. The LCP Amendment incorporated new policies C-12, C-13 and C-14 to protect water quality during construction and operation of the proposed project.

The proposed project would result in an increase in the amount of impervious surfaces at the Airport due to the extension of paved surfaces of Runway 7-25 and Taxiway A and the construction of Taxiway M. The safety area at the western end of Runway 7-25 would be a compacted unpaved surface, which would permit groundwater infiltration, but the RSA at the eastern end would remain paved. Potential short-term construction impacts identified in the EIR/EIS include erosion during grading, resulting in sedimentation of adjacent waterways, contamination from equipment discharges and accidental spills, and the potential to encounter subsurface contamination. Mitigation Measures 3.6-1 and -2 (Final AFP EIR/EIS p. 3-120 through 3-121) 3.7-1 through -3 (Final AFP EIR/EIS) are included to reduce these impacts to less than significant levels. The mitigation measures call for development and implementation of Best Management Practices (BMPs), a Stormwater Pollution Prevention Plan (SWPPP), a Construction Phase Erosion Control Plan, and a Construction Contingency Plan (in the event that unknown subsurface contamination is encountered). In addition, storm drain pollutant interceptors would be installed on all new storm drain inlets in the airfield and existing airfield storm drain inlets would be retrofitted. As required by the Regional Water Quality Control Board, the Airport would obtain a stormwater NPDES permit.

Consistent with LCP Policy C-13, a Water Quality Mitigation Plan (WQMP) has been developed for the project. The project design incorporates and complements existing drainage patterns and systems, includes methods to capture and filter pollutants, provides post-development Best Management Practices (BMPs) and includes measures to prevent streambank erosion and creek or wetland siltation (Attachment 16). Monitoring activities consistent with this policy have been incorporated into the WQMP.

In compliance with LCP Policy C-14, a Construction Phase Erosion Control and Polluted Runoff Control Plans has been developed for the project and incorporated into the project design and the proposed SWPPP (Attachment 17). The plans incorporate BMPs to

minimize erosion and sedimentation, includes revegetation of disturbed areas and limit grading activities during the rainy season.

Cultural Resources

There are a number of cultural resources on Santa Barbara Airport property. During Section 106 consultation with the State Historic Preservation Office for the Aviation Facilities Plan (AFP), it was determined that only Buildings 248 and 249 (Great Western Aero hangars) are eligible for listing in the National Register of Historic Places (NHRP). These buildings are not located in the project vicinity and would not be affected by the proposed project. The Airline Terminal building is not eligible for the NHRP, but is a designated City Landmark. It will not be affected by the proposed project.

The only structure that would be demolished under the proposed project is the WWII Small Arms and Pyrotechnic Magazine (Building 323). This building was evaluated during the AFP Section 106 consultation and was determined to not be NHRP-eligible. Per EIR Mitigation Measure 3.9-3, (Condition of Approval F, City Council Resolution 03-072 – Attachment 13, page 25) this building would be photo-documented prior to demolition. Building 325 (High Explosives Magazine), which was also determined to not be NHRP-eligible, is located within the construction zone, but would be preserved per Condition of Approval H-37 (City Council Resolution 03-072 – Attachment 13, page 34). Additional information on historic structures can be found in the Aviation Facilities Plan Final EIR/EIS Section 3.9 (pages 3-139 through 3-153).

Archaeological resources are also present on the project site. One known site, CA-SBA-52, is located in proximity to the area of disturbance. Discussion of potential impacts to this site and mitigation measures is included in the AFP EIR/EIS (pages 3-139 through 3-153). With implementation of the required mitigation measures, potential impacts to CA-SBA-52 would be mitigated to less than significant levels through avoidance of the sensitive area (City Council Resolution 03-072 – Attachment 13, Conditions of Approval E-4 (pages 22-23), H-1 and H-2 (pages 26-27)).

Municipal Code

The intent of the Aircraft Approach and Operations (A-A-O) (SBMC §29.12.005) is to provide suitable land uses in the areas beneath the approach surfaces, and the area of aircraft operations adjacent to runways and taxiways, including Runway Protection Zones, and Runway and Taxiway safety areas. Runways, taxiways and safety areas are all permitted uses within the A-A-O Zone. The Goleta Slough Reserve (G-S-R) Zone is intended to protect, preserve, and maintain the environmentally sensitive habitat areas of Goleta Slough (SBMC §29.25.010). Incidental public service uses consistent with Coastal Act Section 30233 are allowed in the G-S-R Zone with approval of a Goleta Slough Reserve Coastal Development Permit.

The findings for a Goleta Slough Reserve Permit (SBMC §29.25.050) require the proposed project to incorporate enhancements to public educational and recreational opportunities at the Goleta Slough into the project design. Public education and recreational enhancements have been incorporated into the Airfield Safety Projects

including: (1) development of an interpretive facility and Slough viewing overlook to be located near the intersection of William Moffett Place and Sandspit Road (Attachment 18); and (2) trails and trail enhancements and interpretive signs to be located in the upland portions of Wetland Restoration Area I (Attachment 19). Access to Area I would continue to be granted to educational organizations at the discretion of the Airport Director consistent with the Access Procedures for the Goleta Slough provided in the Airport and Goleta Slough Local Coastal Program Phase III Implementation Package. All trails and trail enhancements would be consistent with wetland restoration activities proposed for Area I in the Wetland Mitigation Plan for the project.

Further, a quarterly Goleta Slough guided tour would be conducted within dry land areas of the Slough and guided by individuals with knowledge of the Goleta Slough ecosystem. The tour would be available to educational groups and the public through an advance reservation system and advertised on the City and Airport websites and other media. The tour would be conducted in accordance with Transportation Security Administration (TSA) and Airport policies and regulations with respect to airport security. Policies for administration of the tour, including the maximum number of attendees, tour routes and activities, security measures and transportation arrangements would remain at the discretion of the Airport Director and would be consistent with the requirements of the Access Procedures for the Goleta Slough provided in the Airport and Goleta Slough Local Coastal Program Phase III Implementation Package. City Council Condition of Approval H-35 in Resolution 03-072 includes the requirements for these recreational and educational enhancements to Goleta Slough.

Status of Other Agency Permits

Applications have been filed for an Army Corps of Engineers (ACOE) Clean Water Act Section 404 permit, Regional Water Quality Control Board (RWQCB) Clean Water Act Section 401 Water Quality Certification and California Department of Fish and Game Section 1601 Streambed Alteration Agreement (Attachments 8-10). The ACOE Section 404 permit is pending, and will be issued upon the receipt of the RWQCB Section 401 certification. A follow-up letter to the RWQCB was recently sent to address the request for additional information in their May 10, 2002 letter (Attachment 11).

Conclusion

The proposed Airfield Safety Projects are necessary to improve safety for the current level of aircraft operations at the Airport. The proposed project would not increase the capacity of the runway, nor result in a change in the type of aircraft used at Santa Barbara Airport.

The location of the Airport adjacent to the Goleta Slough represents many challenges that were carefully considered during development of the Aviation Facilities Plan in 2001 and the recent Airport and Goleta Slough LCP Amendment. These plans recognize the need to balance airport operations with wetland habitat preservation, maintenance and restoration. The Airfield Safety Projects and the Wetland Mitigation Plan would be

implemented consistent with these plans to ensure the continued viability of Goleta Slough.

If you have any questions regarding this application, please contact me at (805) 692-6002 or Laurie Owens, Project Planner at (805) 692-6023.

Sincerely,



Karen Ramsdell
Airport Director

cc: David Kessler, Federal Aviation Administration, Southwest Region (w/o attachments)
Kim Gould, Sempra Energy – Environmental Services

Attachments:

1. Coastal Development Permit application forms
2. Proof of applicant's interest in real property
3. Assessor's Parcel Maps
4. Stamped envelopes and mailing list
5. Vicinity map
6. Two sets of project plans
7. Final Aviation Facilities Plan EIS/EIR and addendum
8. Application to California Department of Fish and Game for Fish and Game Code Section 1601 Streambed Alteration Agreement
9. Application to Army Corps of Engineers for Clean Water Act Section 404 Permit
10. Application to Regional Water Quality Control Board for Clean Water Act Section 401 Water Quality Certification
11. Letter to Roger Briggs, Regional Water Quality Control Board re: Clean Water Act Section 401 Water Quality Certification Application
12. Planning Commission Resolution dated June 19, 2003
13. City Council Resolution dated July 15, 2003
14. Letter from Southern California Gas dated July 16, 2003 and gas line relocation plan
15. Wetland Mitigation Plan
16. Water Quality Management Plan
17. Stormwater Pollution Prevention Plan (SWPPP)
18. Goleta Slough Overlook Site Plan
19. Area I Conceptual Trail System

