

## NOTICE OF EXEMPTION (NOE)

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To: ☐ Office of Planning and Research  
P.O. Box 3044, 1400 Tenth St. Rm. 212  
Sacramento, CA 95812-3044

From: City of Goleta  
130 Cremona Drive, Suite B  
Goleta, CA 93117

X Clerk of the Board of Supervisors  
County of Santa Barbara  
105 E. Anapamu Street, Room 407  
Santa Barbara, CA 93101



**Subject:** Filing of Notice of Exemption

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**Project Title:**

Amendment to the Camino Real Specific Plan and Storke Medical Center Two New Buildings and Associated Improvements; Case Nos. 21-0005-DP; 21-0002-SP; 22-0002-ORD, 23-0001-DPAM.

**Project Applicant:**

Wynmark Company, Agent for Camino Real IV, LLC and The Price Living Trust, property owners.

**Project Location (Addresses and APN):**

6975 Santa Felicia Drive, Goleta CA, 93117, County of Santa Barbara, APN: 073-440-026.

**Description of Nature, Purpose, and Beneficiaries of Project:**

The project site is identified as APN 0713-440-026, located at 6975 Santa Felicia Drive in the City of Goleta, Santa Barbara County. The General Plan/Local Coastal Plan Land Use designation for the site is Community Commercial (CC); the associated zoning district is also Community Commercial (CC) and has a Specific Plan overlay. The site is located in the Inland area of the City and was previously graded, and utilities were extended to the site as part of the work done with the Camino Real Market Plan Specific Plan development in July, 1997 and with the Ice in Paradise Skating rink development in 2015. As part of the Camino Real Market Place Specific Plan, the site was previously analyzed in the Final Environmental Impact Report certified by the County of Santa Barbara in January 1997.

The project comprises the construction of a total of 37,200 square feet of medical office buildings including 2,113 square feet for a day care facility for employees' children, with a maximum of 30 children between the ages of 3 months to 5 years old. New building construction will occur at the mostly vacant parcel located at the southwest corner of Santa Felicia Drive and Storke Road as shown in Figure 1 below.

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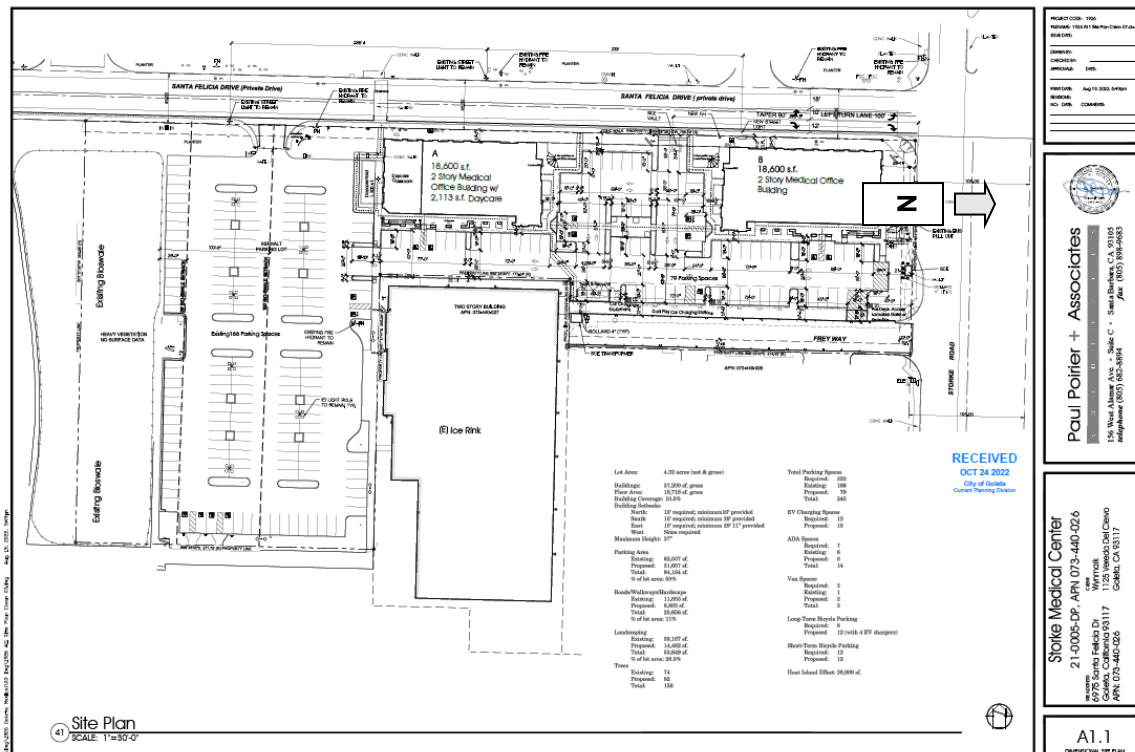
Figure 1- Vicinity Map



The Project consists of (i) a Development Plan to construct two 18,600 square foot two-story Medical Office buildings with accessory childcare use which will replace 95-DP-026, (ii) a Specific Plan Amendment to remove this parcel (073-440-026) from the Camino Real Specific Plan Map, and (iii) an Ordinance Amendment to remove the Specific

Plan Overlay on this parcel for Medical Center office space for providers of medical and wellness services within two 18,600 square foot, 2-story buildings. (iv) Development Plan Amendment to the original Camino Real Development Plan (95-DP-026) to remove this parcel. An Adjustment to the Development Plan for height is requested and will be reviewed by the Review Authority for a 1'9" increase in height allowed in the CC Zone. The project location is in the heart of western Goleta and adjacent to Ice in Paradise and Girsh Park. The project also includes 2,113 square feet in the western building for a childcare facility to support the future employees. The childcare facility also includes a 1,200 square foot outdoor play yard attached to the childcare facility. The project site is on a 4.32-acre parcel that is partially developed with a 175 space parking lot and bioswale.

A new parking lot will be created on the site which will have 71 standard sized parking stalls ( 9'x16' with a 2' overhang) and 8 ADA complaint parking spaces. This allows for drive aisles that are 26' in width as requested by the Fire Department. Of the 8 ADA compliant spaces, 3 spaces will be designated as van accessible. Along the southern edge of the new parking lot there will be 15 electrical vehicle charging stations (7 dual



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### Exempt Status:

- X Categorical Exemption: *In-Fill Development Project, State CEQA Guidelines, §15332*

### Reason(s) why the project is exempt:

#### Categorical Exemption: *In-Fill Development Projects §15332*

Class 32 consists of projects characterized as in-fill development where the project is (a) consistent with the applicable general plan designation and all applicable general plan policies, as well as with applicable zoning designation and regulations, (b) occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses, (c) no value, as habitat for endangered, rare or threatened species, (d) would not result in any significant effects relating to traffic, noise, air quality, or water quality, and (e) adequately served by all required utilities and public services.

Consistent with the requirements of the Class 32 requirements above, and pursuant to CEQA Guidelines §15300.2, *Exceptions to the Exemption*, the entirety of the project falls within the Class 32 Exemption set forth in State CEQA Guidelines section 15332.

#### *General Plan and Zoning Consistency*

The project will conform to the policies within the City of Goleta General Plan, and the regulations of Title 17, the City of Goleta Zoning Ordinance, within the City of Goleta Municipal Code. The property is in an urbanized area with Community Commercial (CC) General Plan and zoning designations and the uses are allowed. The project has been designed to meet the applicable standards. Additionally, no variances or exceptions are required, and all services and access to the parcels are sufficient and will comply with local standards.

The site was originally planned to be a transit center that Metropolitan Transit District no longer needs. The amendment to the Specific Plan will allow a range of uses that will be consistent with the General Plan land use policies and other regulations and would allow for more than just one use authorized by the Specific Plan. Further, the Specific Plan was adopted before City incorporation and the applicable County of Santa Barbara regulations are no longer applicable. The Amendment to the Specific Plan will not have an environmental impact in that the General Plan designation and zoning are not changing for the site. The impacts of the range of uses allowed by the General Commercial designations were analyzed as part of the Environmental Impact Report prepared for the General Plan adoption in 2006.

Further, the project will provide square footage for a use (medical office and day care) that is not readily available in Western Goleta. Having medical office use will serve the day-to-day needs of nearby residents and help reduce traffic trips to other parts of Goleta and/or to Santa Barbara, which is consistent with policies in the Land Use and Traffic Elements of the General Plan.

#### *Airport Safety*

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The project is located within Safety Zone 2 of the Santa Barbara Airport in the Airport Land Use Compatibility Plan (ALUCP) adopted January 2023. Until the City adopts revised Safety Element General Plan Policies related to airport safety, only the ALUCP standards apply to the project. Chapter 3.3.5 in the ALUCP Nonresidential Development Criteria includes a maximum acceptable intensity calculated as people per acre on a site-wide average. The Maximum Intensity of People/Acre for Nonresidential Development is 80 people per acre, and Medical Office is considered Conditionally Compatible in Safety Zone 2. The applicant indicates that the maximum anticipated number of people on site is 184 people (including the day care use). Using the Methods for Determining Concentration of People in Appendix E of the ALUCP and attached as attachment A, the density on site would be 43 people per acre (184 people /4.3 acres = 43 people/ acre) which is well within the acceptable range as noted in ALUCP Table 3-2 below.

With incorporation of risk reduction strategies, population density could go as high as 120-160 people per acre; however, the anticipated population density is already within the Santa Barbara Airport Safety Comparability Criteria as shown in Figure 3. Further, the Maximum Lot Coverage for Conditionally Compatible Development in Safety Zone 2 is 50%. The project proposes 10% lot coverage (19,716 square feet of the 188,179 square foot lot), so the Development meets the Maximum Lot Coverage standard in the ALUCP Safety Compatibility Criteria as shown in Figure 3.

Figure 3 -Table 3-2 of the ALUCP

TABLE 3-2  
SANTA BARBARA AIRPORT SAFETY COMPATIBILITY  
CRITERIA

Land Use Types / Typical Uses	Safety Zone						Criteria for Conditionally Compatible (Yellow) Uses
	1	2	3	4	5	6	
<ul style="list-style-type: none"> <li>Multiple land use categories and compatibility criteria may apply to a land use action</li> </ul>							
<b>Maximum Intensity (People/Acre – sitewide average)</b> Nonresidential Development	0	80	150	200	150	No limit	<ul style="list-style-type: none"> <li>Maximum Intensity and Lot Coverage limits apply to all conditionally compatible uses, unless such development would be subject to "Infill" or "Nonconforming" provisions.</li> <li>Numbers below refer to zones in which additional specified conditions (i.e., those beyond the maximum intensity and lot coverage limits) are applicable.</li> <li>No development may occur within a Runway Safety Area (RSA) or Object Free Area (OFA).</li> </ul>
<b>Intensity with Risk Reduction (People/Acre – sitewide average)</b> Nonresidential Development	n/a	120-160	210-300	300-400	210-300	No limit	
<b>Maximum Lot Coverage (Building footprint/site size)</b> Applicable to all Conditionally Compatible Development	0%	50%	60%	70%	70%	100%	

*Project occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*

New development is proposed to occur on the project site total of 4.32 acres, of which 1.9 acres of the site are proposed to be developed which is less than 5 acres in size.

The project site is located on a substantially developed site within the City of Goleta limits, and it is substantially surrounded by urban uses, being to the north of the County

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Fire Station and south of the Camino Real Marketplace (Home Depot) and west of Girsh park and east of commercial development across Storke road.

### *Biological Resources*

Per Figure 4-1, *Special-Status Species and Environmental Sensitive Habitat Areas (ESHA)* of the City of Goleta General Plan, the site does not contain special-status species. Additionally, the project site has no potential value as a habitat area for endangered, rare, or threatened species given that the site has been previously graded and is partially developed as a parking lot and is situated adjacent to similar developments within the urban context. The closest riparian corridor or creek to the project site is approximately 235 feet to the west, a bioswale developed at the same time as the Camino Real Marketplace, which is separated by the existing asphalt parking lot. The project will not have an impact on this habitat area.

### *Transportation*

The project would not result in any significant impacts related to traffic based on the Vehicle Miles Traveled Study prepared by Associated Transportation Engineers and accepted by the City of Goleta Public Works Department.

### *Noise*

Additionally, the project would not result in potentially significant impacts related to noise. The project site is located within the 60 dBA noise contour for both airport and roadway noise. There is a small band along the project's north and east property boundary that is in the 65 dBA noise contour for roadway noise from Santa Felcia Road and Storke Road. According to the City of Goleta General Plan Table 9-2, Noise and Land Use Compatibility Criteria, office buildings and day care center (schools) are acceptable within the 60 dBA CNEL. The small band of the project site within the 65 dBA contour is primarily within the landscaped buffer and avoids the structures but this noise level is considered acceptable for office use and conditionally acceptable for the day care component. Therefore, the project is consistent with the General Plan.

With respect to noise increase from project related traffic, impacts would be significant if the additional traffic resulted in exposure of sensitive noise receptors to "unacceptable" noise. The Goleta General Plan identifies sensitive noise receptors as residential neighborhoods, schools, libraries, hospitals and rest homes, auditoriums, certain open space areas, and public assembly places. The sensitive noise receptor on site is the proposed day care center. The closest off-site noise receptors are the apartments on Phelps Road which are 815' to the south. Based on the traffic study prepared for the project, existing average daily traffic volumes along Storke Road will increase from the project by approximately 5% which will be an insignificant change in the existing noise levels and will not increase onsite outdoor noise to a level in excess of 65 dBA.

Noise from construction activities is primarily associated with grading activities and site preparation. For the project, these activities are expected to take no longer than 15 days and all construction will occur on weekdays during working hours. The project will comply with standard City of Goleta construction hours, which are from 8AM to 5PM, Monday through Friday, with no construction allowed on State holidays.

It is important to note that there are existing 2-story buildings (fire station, ice rink and

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hotel) between the project site and the apartments that will serve to attenuate any noise (temporary or permanent) from the project site. The project will not result in the generation of a substantial temporary or permanent increase in ambient noise in the project vicinity.

Ground-borne noise and vibration are generally the result of construction activities, particularly grading, and they tend to occur adjacent to the construction site. Due to the small amount of grading to occur and the short duration of the grading phase of the project (15 days), the project will not result in excessive ground-borne vibration or ground-borne noise levels.

According to the recently adopted ALUCP, the project site lies within the 60-65 dB CNEL noise exposure range for the airport. Table 3.1 of the ALUCP identifies office use as compatible use in this area. Day care centers are conditionally compatible if the noise can be attenuated to a level of 45dB CNEL for the indoor space. Noise attenuation measures have been incorporated into the design of the buildings. These measures, coupled with standard construction methods, will ensure that the interior noise levels do not exceed 45 dB CNEL for any occupied space inside the proposed buildings. Therefore, the project will not expose people to excessive noise levels.

### *Air Quality*

A project conforms with an air quality plan if it complies with all applicable APCD rules and regulations, complies with proposed control measures that are not yet adopted from the air quality plan, and is consistent with growth forecasts in the plan. The most recent air quality plan is the 2022 Ozone Plan adopted by the Santa Barbara County APCD Board on December 15, 2022. The Ozone Plan relies on land use and population projections as a basis for forecasting vehicle emissions. The projections are based on the General Plans of the local jurisdictions. The Storke Medical Center project is consistent with the Community Commercial designation of the General Plan and Zoning Ordinance and therefore, was included in the 2022 Ozone Plan. As such, the project would not conflict with the applicable air quality plan.

### Construction Emissions

The CalEEMod Version 2022 was used to estimate emissions from construction of the project. Table 3 from the Dudek assessment provides an estimate of annual emission generated during construction of the project. As shown in the table, construction related emissions would not exceed the City's threshold of significance for criteria air pollutant.

Table 3 Estimated Annual Construction Criteria Air Pollutant Emissions

	ROC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Year	Tons per year					
2023	0.10	0.87	0.91	0.00	0.07	0.05
2024	0.51	0.40	0.45	0.00	0.02	0.02
Maximum	0.51	0.87	0.91	0.00	0.07	0.05
Threshold	25	25	25	25	25	25
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROC = reactive organic compound; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter.



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### Operational Emissions

Table 4 from the Dudek assessment presents the maximum daily emissions during operation of the project for both the summer and winter seasons. As the table indicates, the project would not exceed the City's operational criteria pollutant emissions thresholds.

Table 4 Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NOx	CO	SOx	PM10	PM2.5
	Pounds per Day					
Summer (max)						
Area	1.38	0.01	1.71	0.00	0.00	0.00
Energy	0.02	0.28	0.23	0.00	0.02	0.02
Mobile	5.56	3.51	28.0	0.05	1.68	0.33
Total	6.96	3.80	29.9	0.05	1.71	0.36
Winter (max)						
Area	1.10	0.00	0.00	0.00	0.00	0.00
Energy	0.02	0.28	0.23	0.00	0.02	0.02
Mobile	5.58	3.86	30.3	0.05	1.69	0.33
Total	6.70	4.13	30.6	0.05	1.71	0.35
Threshold	25	25	—	—	—	—
Vehicle source emissions threshold exceeded?	No	No	—	—	—	—

Notes: VOC = volatile organic compound; NO<sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO<sub>x</sub> = sulfur oxides; PM<sub>10</sub> = coarse particulate matter; PM<sub>2.5</sub> = fine particulate matter.

### Cumulative Net Increase

The County is currently designated as a nonattainment area for O<sub>3</sub> although in January 2023, the California Air Resources Board held a hearing to change the designation to "nonattainment-transitional" for ozone standards. This change becomes official once finalized by the California Office of Administrative Law. Construction of the project would generate VOC and NO<sub>x</sub> emissions that are both precursors to O<sub>3</sub>. As indicated in Tables 3 & 4, the project would not exceed thresholds of significance for VOC or NO<sub>x</sub> for either construction or operation, and therefore would not result in a cumulatively considerable increase of nonattainment pollutants.

### Toxic Air Contaminants

The Santa Barbara County APCD considers the following land uses as sensitive receptors: schools, daycare facilities, hospitals and adult care facilities. The project proposes a day care facility on the site and the Isla Vista Childrens Center is located approximately 1,100 to the southeast of the project site. The technical air quality assessment prepared by Dudek analyzed the potential of the project to impact these sensitive receptors from toxic air contaminants, carbon monoxide and other criteria pollutants.

Project construction would result in the emission of diesel exhaust from heavy construction equipment which is considered a toxic air contaminant by the State. However, due to the relatively short period of exposure, the minimal particulate emissions on the site, and distance of the Isla Vista Childrens Center, the toxic air contaminants generated during construction would not result in concentrations causing



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significant health risks. During operation, the project would not generate any toxic air contaminants.

### Carbon Monoxide (CO)

Projects which contribute to substantial adverse traffic impacts may result in the formation of carbon monoxide hot spots. Since Santa Barbara County has relatively low background ambient CO levels, localized impacts from traffic are not expected to exceed CO health-related air quality standards. As such, the project would not pose any health risks from carbon monoxide emissions.

### Other Criteria Pollutants

Construction and operation of the project would not result in emissions that exceed the Santa Barbara County APCD's emission thresholds for any criteria air pollutant, and therefore would not expose sensitive receptors to substantial pollutant concentrations.

As a medical office use, the project will not generate any objectionable odors during operation. The potential for odors is associated with vehicle and equipment exhaust during construction. Given the relatively short duration of construction and the fact that the project site is not surrounded by a substantial number of people during construction hours, the project will not create odor impacts considered significant.

### Greenhouse Gas

Consistent with other recent City documents, the City has relied upon the Bay Area Air Quality Management District's recommended threshold of significance of 1,100 metric tons of carbon dioxide equivalent (MT CO<sub>2</sub>e) per year. As shown in the Tables 1 and 2 below, the project's operational GHG emissions plus amortized construction emissions would be 807 MT CO<sub>2</sub>e per year. Therefore, the project would not exceed the City's significance threshold and impacts would be considered less than significant.

Table 1

### Estimated Annual Construction Greenhouse Gas Emissions

Year	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	Metric Tons			
2023	322.83	0.05	0.01	326.08
2024	1.63	0.00	0.00	1.65
Total				327.73
Annualized emissions over 30 years (metric tons per year)				10.92
Threshold				1,100 metric tons

**Notes:** CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalent.

Table 2

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### Estimated Annual Operation Plus Amortized Construction Greenhouse Gas Emissions

Emissions Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	Metric Tons per Year			
Area	0.00	0.00	0.00	0.00
Energy	143.15	0.01	0.00	143.92
Mobile	457.59	0.04	0.03	467.04
Solid Waste	79.27	3.93	0.00	177.55
Water and Wastewater	6.81	0.01	0.00	8.01
Amortized construction emissions				10.92
Total				807.43
Threshold				1,100
				metric tons

**Notes:** CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalent.

#### *Hydrology and Water Quality*

The project will not violate any water quality standards or waste discharge requirements. Stantec Consulting Services prepared a Supplemental Stormwater Analysis for the project dated October 19, 2022 to demonstrate that the Storke Medical Center Project can meet the applicable requirements of the Central Coast Regional Water Quality Control Board Resolution No. R3-2013-0032 with the current design. The project will utilize existing downstream facilities (the on-site bioswale) per Section B.6) a) ii) "Intermediate Flow Control Facility Special Circumstances" of the Board Resolution. The project runoff will discharge stormwater to an existing storm drain system that includes a 60" storm drainpipe in Santa Felicia which directs water to a 38,150 square foot bioswale for treatment. Water is then directed to a 61,100 square foot detention basin for storage. Finally, water will be discharged to an existing public storm drain system in Phelps Road. This system will provide an improvement in surface water quality from the existing condition where runoff from the vacant parcel sheet flows directly south and does not take advantage of the natural filtration and storage offered by the bioswale and detention basin.

The project will not rely on groundwater as a source of potable water and therefore will not decrease supplies or interfere with groundwater recharge. Water for the project will be provided directly from the Cachuma Water Project pursuant to an Exchange Contract with the Bureau of Reclamation dating back to 1952. Water will be delivered to the site by the Goleta Water District under a Water Conveyance Agreement.

Currently, water runoff from the 1.9 acre vacant site sheet flows to the southern edge of the parcel where it enters an existing storm drain system that flows south. It by-passes the existing large bioswale on the western portion of the parcel. As part of the proposed project, runoff from the portion of the parcel proposed for the medical center will be collected by catch basins on the south side of the proposed parking area and conveyed in storm drainpipes to the center of the site which head north to connect to the existing 60" storm drain pipe in Santa Felicia Drive. Water will then drain to the existing 38,150 square foot bioswale and 61,100 square foot detention basin which serve as natural water quality filtration systems for storm water runoff and water detention basins for flood

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control purposes. From the detention basin, water leaves the site through two existing storm drains in Phelps Road and ultimately ends up in the Devereux Slough. Implementation of the proposed stormwater system will improve downstream water quality from existing conditions. Stantec Consulting Services prepared a Supplemental Stormwater Analysis for the project dated October 19, 2022 to demonstrate that the additional runoff from the project (0.13 CFS in the 1"to1m event) will not exceed capacity and have a negative impact on the existing bioswale or detention basin facilities.

The 1.9 acres that comprise the project site will be occupied by 2 medical office buildings, a parking lot, and landscape buffers. There will be no storage of chemical or other hazardous materials on the site. Given this use and the project design, there will be no potential for release of pollutants due to project inundation.

Stantec Consulting Services prepared a Supplemental Stormwater Analysis for the project dated October 19, 2022 to demonstrate that the Storke Medical Center Project can meet the applicable requirements of the Central Coast Regional Water Quality Control Board Resolution No. R3-2013-0032 with the current design. The project will utilize existing downstream facilities (the on-site bioswale) per Section B.6) a) ii) "Intermediate Flow Control Facility Special Circumstances" of the Board Resolution. The project is consistent with the existing 2013 Water Quality Control Plan.

### *Utilities and Services*

The existing parcel will be served by all required utilities and public services. The new development conforms to the policies of the City of Goleta General Plan, and the regulations of Title 17, the Goleta Zoning Ordinance, within the City of Goleta Municipal Code.

For all of the foregoing reasons, the entirety of the project falls within the Class 32 exemption.

### *Exceptions to the Exemption*

Moreover, none of State CEQA Guidelines section 15300.2's exceptions to the Class 32 exemption apply to the project. The exception set forth in State CEQA Guidelines section 15300.2(a), by its own terms, does not apply to projects that fall within the Class 32 exemption; moreover, the project will not impact an environmental resource of hazardous or critical concern that is designated, precisely mapped, or officially adopted pursuant to law by federal, state, or local agencies. Section 15300.2(b)'s exception, relating to cumulative impacts, does not apply as technical reports in the record of proceedings demonstrate that the project would not result in significant cumulative impacts; moreover, there are no other successive projects of the same type in the same place that could result in significant cumulative impacts. Section 15300.2(c)'s exception does not apply because there are no "unusual circumstances" that apply to the project; construction of commercial buildings as urban infill on commercially zoned land next to existing development does not constitute an unusual circumstance. Section 15300.2(d)'s exception does not apply because the project is not located near any scenic highways. Section 15300.2(e)'s exception does not apply because the project site and off-site improvement locations do not contain hazardous waste and are not on any list compiled pursuant to Section 65962.5 of the Government Code. Finally, Section

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15300.2(f)'s exception does not apply because the project has no potential of causing a substantial adverse change in the significance of a historical resource. Additionally, the project's site does not contain any identified significant cultural resources and will be conditioned to include all mandatory grading best practices.

For all of the foregoing reasons, the entirety of the project is exempt under the Class 32 exemption.

### **Conclusion:**

Based on this analysis, the entirety of the *Specific Plan Amendment to the Camino Real Market Plan and the Wynmark/Storke Medical Center Two New Buildings and Associated Improvements* Project meets all criteria for the Class 32 Categorical Exemption pursuant to Section 15332 of the State CEQA Guidelines. Furthermore, exceptions to the applicability of a Categorical Exemption, as specified in Section 15300.2(a) through (f) of the CEQA Guidelines, do not apply to the project. Therefore, the project is exempt from CEQA.

**Attachment A** - Appendix E of the ALUCP

### **City of Goleta Contact Person and Telephone Number:**

Christina McGuire, Associate Planner, (805) 961-7566

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Lisa Prasse, AICP

Current Planning Manager

Date

Note: Authority cited: Section 21083 and 211110, Public Resources Code  
Reference: Sections 21108, 21152.1, Public Resources Code

# Appendix E

## **Methods for Determining Concentrations of People**

## **APPENDIX E**

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# **Methods for Determining Concentrations of People**

One criterion used in many compatibility plans is the maximum number of people per acre that can be present in a given area at any one time. If a proposed use exceeds the maximum density, it is considered inconsistent with compatibility planning policies. This appendix provides some guidance on how the people-per-acre determination can be made.

The most difficult part about making a people-per-acre determination is estimating the number of people likely to use a particular facility. There are several methods which can be utilized, depending upon the nature of the proposed use:

## **Parking Ordinance**

The number of people who could be present in a given area can be calculated based upon the number of parking spaces required by the zoning ordinance. Some assumptions regarding the number of people per vehicle needs to be developed to calculate the number of people on-site. The number of people per acre can then be calculated by dividing the number of people on-site by the size of the parcel in acres. This approach is appropriate where the use is expected to be dependent up on access by vehicles. Conversely, this approach may not be appropriate for more urban developments, including transit-oriented development, where fewer parking spaces are provided to discourage single occupancy vehicle trips. Depending upon the specific assumptions utilized, this methodology typically results in a number in the low end of the likely intensity for a given land use.

## **Maximum Occupancy**

The California Building Code (CBC) can be used as a standard for determining the maximum occupancy of certain uses. The chart provided as Exhibit F1 indicates the required number of square feet per occupant. The number of people on the site can be calculated by dividing the total floor area of a proposed use by the minimum square feet per occupant requirement listed in the table. The maximum occupancy can then be divided by the size of the parcel in acres to determine the people per acre. Surveys of actual occupancy levels conducted by various agencies have indicated that many retail and office uses are generally occupied at no more than 50% of their maximum occupancy levels, even at the busiest times of day. Therefore, the number of people calculated for office and retail uses should usually be adjusted (50%) to reflect actual occupancy



levels before making the final people-per-acre determination. Even with this adjustment, the CBC-based methodology typically produces intensities at the high end of the likely range.

## Other Methodologies

Some uses (such as theaters or churches) may be calculated based on the number of fixed seats. This is likely to produce a range between the two methods described above. Certain uses may require an estimate based upon a survey of similar uses. This approach is more difficult, but is appropriate for uses which, because of the nature of the use, cannot be reasonably estimated based upon parking or square footage.

**Exhibit E-1** provides standard floor area per occupant (in square feet) for a variety of spaces, while **Exhibit E-2** shows sample calculations.

**TABLE 1**  
**MAXIMUM FLOOR AREA ALLOWANCES PER OCCUPANT**

Function of Space	Occupant Load Factor <sup>a</sup>
Accessory storage areas, mechanical equipment room	300 gross
Agricultural building	300 gross
Aircraft hangars	500 gross
Airport terminal	
Baggage claim	20 gross
Baggage handling	300 gross
Concourse	100 gross
Waiting areas	15 gross
Assembly	
Gaming floors (keno, slots, etc.)	11 gross
Exhibit Gallery and Museum	30 net
Assembly without fixed seats	
Concentrated (chairs only-not fixed)	7 net
Standing space	5 net
Unconcentrated (tables and chairs)	15 net
Bowling centers, allow 5 persons for each lane including 15 feet of runway, and for additional areas	7 net
Business areas	100 gross
Courtrooms-other than fixed seating areas	40 net
Day care	35 net
Dormitories	50 gross
Educational	
Classroom area	20 net
Shops and other vocational room areas	50 net
Exercise rooms	50 gross
H-5 Fabrication and manufacturing areas	200 gross

**TABLE 1**  
**MAXIMUM FLOOR AREA ALLOWANCES PER OCCUPANT**

<b>Function of Space</b>	<b>Occupant Load Factor<sup>a</sup></b>
Industrial areas	100 gross
Institutional areas	
Inpatient treatment areas	240 gross
Outpatient treatment areas	100 gross
Sleeping areas	120 gross
Kitchens, commercial	200 gross
Laboratory	
Educational	50 net
Laboratories, non-educational	100 net
Laboratory suite	200 gross
Library	
Reading Rooms	50 net
Stack area	100 gross
Locker rooms	50 gross
Mercantile	60 gross
Storage, stock, shipping areas	300 gross
Parking garages	200 gross
Residential	200 gross
Skating rinks, swimming pools	
Rink and pool	50 gross
Decks	15 gross
Stages and platforms	15 net
Warehouses	500 gross

## NOTES:

<sup>a</sup> Floor area in square feet per occupant.

SOURCE: California Building Code (2016), Table 1004.1.2

## Exhibit E-1: Occupancy Levels – California Building Code

### Example 1

**Proposed Development:** Two office buildings, each two stories and containing 20,000 square feet of floor area per building. Site size is 3.0 net acres. Counting a portion of the adjacent road, the gross areas of the site is 3.5± acres.

#### A. Calculation Based on Parking Space Requirements

For office uses, assume that a county or city parking ordinance requires 1 parking space for every 300 square feet of floor area. Data from traffic studies or other sources can be used to estimate the average vehicle occupancy. For the purposes of this example, the number of people on the property is assumed to equal 1.5 times the number of parking spaces.

The average usage intensity would therefore be calculated as follows:

- 1)  $40,000 \text{ sq. ft. floor area} \times 1.0 \text{ parking space per } 300 \text{ sq. ft.} = 134 \text{ (rounded from } 133.3\text{) required parking spaces,}$
- 2)  $134 \text{ parking spaces} \times 1.5 \text{ people per space} = 201 \text{ maximum people on site,}$
- 3)  $200 \text{ people} / 3.5 \text{ acres gross site size} = 57.4 \text{ people per acre average for the site.}$

Assuming that occupancy of each building is relatively equal throughout, but that there is some separation between the buildings and outdoor uses are minimal, the usage intensity for a single acre would be estimated to be:

- 1)  $20,000 \text{ sq. ft. bldg.} / 2 \text{ stories} = 10,000 \text{ sq. ft. bldg. footprint,}$
- 2)  $10,000 \text{ sq. ft. bldg. footprint} / 43,560 \text{ sq. ft. per acre} = 0.23 \text{ ace bldg. footprint,}$
- 3)  $\text{Building footprint} < 1.0 \text{ acre; therefore maximum people in } 1 \text{ acre} = \text{bldg. occupancy} = 100 \text{ people per single acre.}$

#### B. Calculation Based on California Building Code

Using the CBC as the basis for estimating building occupancy yields the following results for the above example:

- 1)  $40,000 \text{ sq. ft. bldg.} / 100 \text{ sq. ft. per occupant} = 400 \text{ people max. bldg. occupancy,}$
- 2)  $400 \text{ max. bldg. occupancy} \times 50\% \text{ adjustment} = 200 \text{ people maximum on site,}$
- 3)  $200 \text{ people} / 3.5 \text{ acres gross site size} = 57 \text{ people per acre average for the site.}$

**Conclusions:** In this instance, both methodologies give the same results. For different uses and/or assumptions, the two methodologies are likely to produce different numbers. In most such cases, the CBC methodology will indicate a higher intensity.

## Exhibit E-2: Occupancy Levels – California Building Code Continued

### Example 2

**Proposed Development:** Single-floor furniture store containing 24,000 square feet of floor area on a site of 1.7 net acres. Counting a portion of the adjacent road, the gross area of the site is 2.0 acres.

#### A. Calculation Based on Parking Space Requirements

For furniture stores, the county requires 1 parking space per 400 square feet of use area. Assuming 1.5 people per automobile, the average usage intensity would be:

- 1)  $24,000 \text{ sq. ft. bldg.} \times 1.0 \text{ parking space per } 400 \text{ sq. ft.} = 60 \text{ required parking spaces}$
- 2)  $60 \text{ parking spaces} \times 1.5 \text{ people per space} = 90 \text{ people maximum on site}$
- 3)  $90 \text{ people} / 2.0 \text{ acres gross site size} = 45 \text{ people per acre average for the site}$

Again, assuming a relatively balanced occupancy throughout the building and that outdoor uses are minimal, the usage intensity for a single acre would be estimated to be:

- 1)  $24,000 \text{ sq. ft. bldg. footprint} / 43,560 \text{ sq. ft. per acre} = 0.55 \text{ acre bldg. footprint}$
- 2) Building footprint < 1.0 acre; therefore maximum people in 1 acre = bldg. occupancy = 90 people per single acre

#### B. Calculation Based on California Building Code

For the purposes of the CBC-based methodology, the furniture store is assumed to consist of 50% retail sales floor (at 30 square feet per occupant) and 50% warehouse (at 500 square feet per occupant). Usage intensities would therefore be estimate as follows:

- 1)  $12,000 \text{ sq. ft. retail floor area} / 30 \text{ sq. ft. per occupant} = 400 \text{ people max. occupancy in retail area,}$
- 2)  $12,000 \text{ sq. ft. warehouse floor area} / 500 \text{ sq. ft. per occupant} = 24 \text{ people max occupancy in warehouse area,}$
- 3) Maximum occupancy under CBC assumptions =  $400 + 24 = 424 \text{ people,}$
- 4) Assuming typical peak occupancy is 50% of CBC numbers = 212 people maximum expected at any one time,
- 5)  $212 \text{ people} / 1.26 \text{ acres gross site size} = 168 \text{ people per acre average for the site.}$

With respect to the single-acre intensity criteria, the entire building occupancy would again be within less than 1.0 acre, thus yielding the same intensity of 168 people per single acre.

**Conclusions:** In this instance, the two methods produce very different results. The occupancy estimate of 30 square feet per person is undoubtedly low for a furniture store even after the 50% adjustment. The 72 people-per-acre estimate using the parking requirement methodology is probably closer to be realistic.

As part of the general plan consistency process, ALUCs and local jurisdictions should decide which method or combination of methods is to be used in reviewing development proposals.



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