

7.0 DRAFT EIR COMMENTS AND RESPONSES

This section provides all comments received by the City of Goleta on the Draft EIR during the 45-day public comment period that extended between May 17, 2018 and July 2, 2018. Comments are organized in the following order:

- State Government Agencies;
- Local Government Agencies;
- Community Organizations; and
- Individuals (including verbal testimony provided at the City Environmental Hearing Officer Public Meeting, June 14, 2018)

Each individual comment is identified and has been addressed in a response provided after the comment letter or Environmental Hearing Officer Public Meeting minutes. They are listed below:

Table 7.1 Draft EIR Comments and Responses

Comment Author, Date	Page Number
A. State Clearinghouse (Scott Morgan, July 3, 2018) California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Coastal District, Orcutt (Patricia A. Abel, Coastal District Deputy), June 7, 2018	7-2
B. California Coastal Commission (Michelle Kubran, Coastal Program Analyst), June 29, 2018	7-7
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EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

July 3, 2018

RECEIVED

JUL 05 2018

City of Goleta
Planning & Environmental Svcs.

Laura Bridley/Lisa Prasse
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

Subject: Fire Station 10
SCH#: 2017081066

Dear Laura Bridley/Lisa Prasse:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 2, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



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Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017081066
Project Title Fire Station 10
Lead Agency Goleta, City of

Type EIR Draft EIR

Description The project is a single-story, three apparatus bay fire station of ~11,600 sf, a public parking lot with seven spaces, employee parking for nine spaces, and a community room/training room with a 30-person capacity. Site development also includes a bifurcated above-ground fuel tank (250-gallon gasoline and 1,000 gallon diesel), an emergency generator, outside hose drying racks, a soldier pile wall at the mid-shop northern property line, landscaping and site frontage improvements including sidewalk, curb, gutter and bike lane. Preliminary earthwork quantities are estimated to balance on site with 1350 cy of cut, 2250 cy of fill, 900 cy of import and no export required.

Lead Agency Contact

Name Laura Bridley/Lisa Prasse
Agency City of Goleta
Phone (805) 896-2153/805-961-7542 **Fax**
email
Address 130 Cremona Drive, Suite B
City Goleta **State** CA **Zip** 93117

Project Location

County Santa Barbara
City Goleta
Region
Lat / Long
Cross Streets Hollister Avenue at Cathedral Oaks Road
Parcel No. 079-210-075
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 101
Airports Santa Barbara
Railways UPR
Waterways
Schools Ellwood ES
Land Use Commercial Visitor Serving (C-V)/Limited Commercial (C-1)

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Geologic/Seismic; Noise; Public Services; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Landuse; Aesthetic/Visual; Agricultural Land; Recreation/Parks; Water Quality; Water Supply; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Wildlife, Region 5; Department of Fish and Wildlife, Marine Region; Cal Fire; Department of Parks and Recreation; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 5; Regional Water Quality Control Board, Region 3; Native American Heritage Commission; Public Utilities Commission; Department of Housing and Community Development; Office of Emergency Services, California

Date Received 05/18/2018 **Start of Review** 05/18/2018 **End of Review** 07/02/2018



Department of Conservation
Division of Oil, Gas, and Geothermal Resources
Coastal District - Orcutt
195 South Broadway • Suite 101
Orcutt, CA 93455
(805) 937-7246 • FAX (805) 937-0673

RECEIVED

JUN 11 2018

Neighborhood Services &
Public Safety Dept.

June 7, 2018

Ms. Laura Bridley, AICP Contract Planner
City of Goleta, Neighborhood Services & Public Safety Department
130 Cremona Drive, Suite B
Goleta, CA 93117

Dear Ms. Bridley:

DRAFT ENVIRONMENTAL IMPACT REPORT
SCH# 2017081066 FIRE STATION 10 7952 HOLLISTER AVENUE, GOLETA

The Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the Draft Environmental Impact Report for the above referenced project. The Division has no jurisdiction or statutory responsibility for the project. The Division is mandated by section 3106 of the Public Resources Code to supervise the drilling, operation, maintenance, and abandonment of oil and gas wells. This is for the purposes of preventing: 1) damage to life, health, property, and natural resources; 2) damage to underground and surface waters suitable for irrigation or domestic use; 3) loss of oil, gas, or reservoir energy; and 4) damage to oil and gas deposits by infiltration of water and other causes.

The Division has no record of any wells drilled for mineral extraction on or near the Fire Station 10 building site (See page 2). Given the history of oil and gas well development in the area, if any wells are located within the project then the Division should be contacted immediately.

If you have any questions, please contact our Orcutt office - Permitting Staff.

Sincerely,

Patricia A. Abel
Coastal District Deputy

cc: Environmental Subdivision Review
CEQA Unit
State Clearinghouse

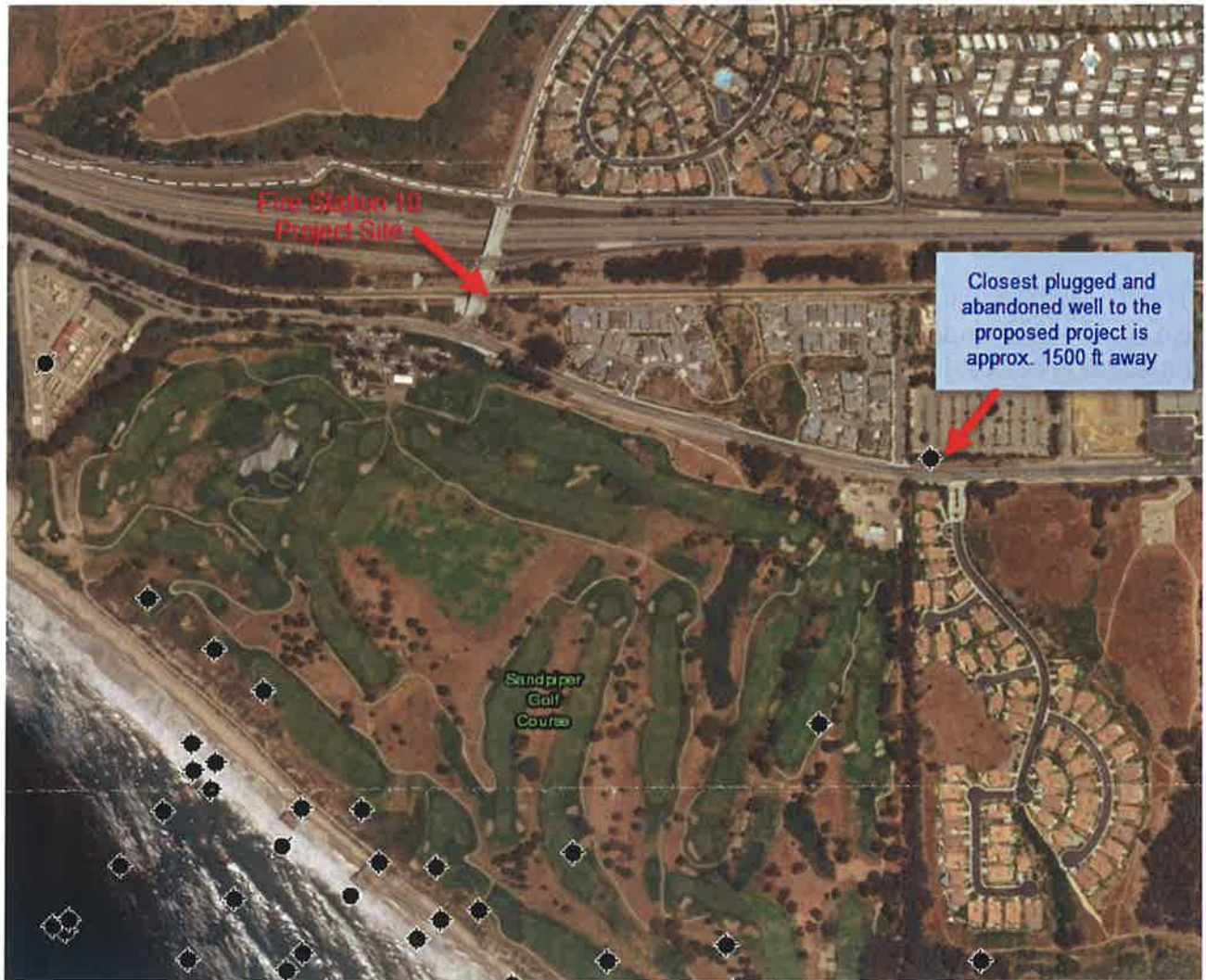
RECEIVED

JUN 11 2018

Western Piedmont Services
Public Safety Dept

LOCATION MAP
BASE INFORMATION FROM WELL FINDER FEATURE
<http://maps.conservation.ca.gov/doggr/index.html#close>

SCH# 2017081066 - FIRE STATION 10
7952 HOLLISTER AVENUE, GOLETA



A. State Clearinghouse (Scott Morgan), July 3, 2018**California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Coastal District, Orcutt (Patricia A. Abel, Coastal District Deputy), June 7, 2018**

A-1. The jurisdiction and expertise of the Division of Oil, Gas, and Geothermal Resources is appreciated and respected.

A-2. The proposed Project does not involve drilling, operating, maintaining, or abandoning oil or gas wells. Previous use of the Project site as a gas station site resulted in soil contamination that was satisfactorily remediated. The Draft EIR Section 4.5 Hazards and Hazardous Materials, Impact HAZ-1 explains that,

“Following multiple phases of environmental site assessments and soil remediation, using soil vapor extraction technology, Santa Barbara County FPD indicated that the remediation system had removed over 90 percent of the initial mass of contaminated soil and that further corrective action was not warranted. The remaining soil contamination is approximately 15 to 20 feet below ground surface. A sensitive receptor survey, based upon readily available public records, site and vicinity inspections, and site assessment results, concluded that the Project site was adequately assessed and that the residual hydrocarbons in soil do not pose a significant threat to human health, to beneficial or potentially beneficial groundwater, or to the environment. County FPD agreed with this synopsis and as a result, site closure was granted by the FPD in a letter dated February 21, 2012.”

No other hazards associated with drilling, operating, maintaining, or abandoning oil or gas wells would result from project implementation.

CALIFORNIA COASTAL COMMISSION

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



June 29, 2018

Neighborhood Services and Public Safety Department
Attn: Laura Bridley, AICP, Contract Planner
130 Cremona Dr., Suite B
Goleta, CA 93117

RE: Fire Station 10 Draft Environmental Impact Report

Dear Ms. Bridley,

Commission staff would like to take this opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for Fire Station 10. The purpose of the DEIR is to assess the proposed development of Fire Station 10 on a vacant parcel (APN 079-210-075), which would involve the removal of 56 eucalyptus trees and other vegetation on site. The DEIR acknowledges that a coastal development permit (CDP) is required to be obtained from the Coastal Commission for the development of the fire station. Based on our review of the DEIR, Commission staff has concerns regarding the project's consistency with the Chapter 3 policies of the Coastal Act and would like to offer the following preliminary comments on the project.

The DEIR states that the project site does not contain any previously mapped or identified special-status species habitat or environmentally sensitive habitat. However, the DEIR also acknowledges that raptors are known to have historically nested within the stands of eucalyptus trees on the project site and have the potential to nest in these trees in the future. But the DEIR concludes that since no raptor nests were observed during a biological survey in 2016, the eucalyptus trees on site do not constitute environmentally sensitive habitat, and therefore, removal of the eucalyptus trees is not a potentially significant impact and does not require mitigation. However, Commission staff disagrees with the conclusion that the removal of known raptor nesting trees is not a potentially significant impact. Commission staff recommends that nesting and wintering raptor surveys are conducted according to the Commission's Raptor Survey Protocols (attached).

As part of an EIR, reasonable alternatives to the proposed project must be analyzed. In addition to the No Project Alternative, the subject DEIR only analyzes alternative locations and does not analyze alternative siting and design on the proposed project site. The DEIR reasons that siting and design alternatives do not need to be analyzed, because "a smaller fire station facility or reconfiguring the structure on-site would not address a potentially significant impact." Since Commission staff disagrees with the conclusion that removal of known raptor nesting trees is not a potentially significant impact, we recommend that the Final EIR analyze siting and design alternatives that would preserve the known nesting trees, remove the fewest number of trees as possible, and maintain as large of a buffer from the nesting trees as possible. In addition to informing the EIR process, the raptor surveys and a complete analysis of siting and design alternatives will also be critical at the coastal development permit review stage for the Coastal Commission to determine the presence of environmentally sensitive habitat on the site and the consistency of the development with the Chapter 3 policies of the Coastal Act.

Further, Alternative 2 of the DEIR analyzes a former California Highway Patrol relocation site as a potential alternative location for Fire Station 10. The DEIR states, however, that the site is not suitable for the fire station, because the state-owned site does not have a historic account with the Goleta Water District and is therefore subject to the water district's current voter-mandated prohibition on new water

connections. Thus, the DEIR concludes that this site would not be feasible for the proposed project. Commission staff recommends analyzing the transfer of the water rights from the proposed project site to the former CHP relocation site.

Thank you for the opportunity to provide comments. These comments represent our preliminary comments of the project based on the DEIR. Depending on the particular details of the final proposed project reviewed as part of a CDP application, there may be additional comments or issues to be addressed. If you have any questions regarding these comments, please contact me at 805-585-1800.

Sincerely,

Michelle Kubran
Coastal Program Analyst

Winter and Nesting Raptor Survey Protocols

Wintering Raptor Survey

The wintering raptor survey plan shall be approved by the Executive Director and shall include the following elements:

- 1) Surveys shall be conducted by biologists with formal training in avian biology, significant field experience in raptor survey techniques, and demonstrated ability to identify accurately local species under a variety of field conditions.
- 2) If available, standard protocols promulgated by the U.S. Fish and Wildlife Service or the California Department of Fish and Game shall be incorporated in the survey plan.
- 3) If standard protocols are not available from the wildlife agencies, the following elements shall be included in the plan:
 - The survey shall be conducted between December 1 and February 15.
 - The survey shall consist of at least five visits.
 - Survey visits shall be spaced at least one week apart.
 - Each visit shall consist of at least two hours on site during the period between dawn and 10:00 am. If the site is very large, forested, or contains extensive riparian habitat, each visit shall be longer in duration as determined by the best professional judgement of a raptor biologist.
 - If there is appropriate habitat for ground-nesting owls on site and such birds are known to occur within the region, there shall be at least three additional survey visits, each conducted during the period immediately before nightfall.
 - The biologist shall specifically search for foraging birds and birds using trees for perching, roosting, or nesting.
- 4) The survey report shall provide a list of species that could reasonably be expected to use habitats on the site under other probable winter weather or prey conditions, and a list of wintering species that are known to have used the site in the past.

Nesting Raptor Survey

The nesting raptor survey plan shall be approved by the Executive Director and shall include the following elements:

- 1) Surveys shall be conducted by biologists with formal training in avian biology, significant field experience in raptor survey techniques, and demonstrated ability to identify accurately local species under a variety of field conditions.

2) If available, standard protocols promulgated by the U.S. Fish and Wildlife Service or the California Department of Fish and Game shall be incorporated in the survey plan.

3) If standard protocols are not available from the wildlife agencies, the following elements shall be included in the plan:

- The survey shall be conducted between March 1 and June 15.
- The survey shall consist of at least five visits.
- Survey visits shall be spaced at least one week apart.
- Each visit shall consist of at least two hours on site during the period between dawn and 10:00 am. If the site is very large, forested, or contains extensive riparian habitat, each visit shall be longer in duration as determined by the best professional judgement of a raptor biologist.
- If there is appropriate habitat for ground-nesting owls on site and such birds are known to occur within the region, there shall be at least three additional survey visits, each conducted during the period immediately before nightfall.
- The biologist shall specifically search for nests and for foraging birds and birds using trees for perching, roosting, or nesting.

4) The survey report shall provide a list of species that could reasonably be expected to use habitats on the site under other probable weather or prey conditions, and a list of species that are known to have used the site in the past.

B. California Coastal Commission (Michelle Kubran, Coastal Program Analyst), June 29, 2018

- B-1.** The Draft EIR Section 4.2.1, Project Site Setting, Sensitive Wildlife Species, has been revised to provide additional clarity regarding the nature of the eucalyptus woodland onsite and its relation to City of Goleta ESHA designation criteria (revised text is underlined, deleted text is struck out).

“Nesting raptors which are protected by the Migratory Bird Treaty Act (MBTA), California Department of Fish and Game Code (DFG Code), as well as the GP/CLUP. Though no nests were identified in the City of Goleta GP/CLUP (City of Goleta 2006) and no raptor nests were identified within the Project site in 2016 (WEI 2016), ~~red-tailed and red-shouldered hawks~~ raptors are known to have historically constructed nests within the stands of eucalyptus trees on the Project site. A raptor nest has been observed onsite during the summer of 2018 (Bill Shelor 2018, Steve Jolley 2018; see Section 7.0, Comment F-3 and F-24). There is the potential ~~to~~ for future nesting in these trees, as well as ornamental trees located within the Project site, ~~in the future.~~”

As noted above, periodic raptor nesting has occurred within the 0.61-acre of eucalyptus woodland onsite. Though no nests were identified during the preparation of the City’s GP/CLUP EIR in 2006 and the on-site biological assessment in 2016, a raptor nest has been observed onsite during the summer of 2018 (Bill Shelor 2018, Steve Jolley 2018; see Section 7.0, Comment F-3 and F-24). This indicates that the 0.61 acres of eucalyptus woodland are periodically used by raptors that are considered California Species of Special Concern.

City of Goleta GP/CLUP Policy CE 1: Environmentally Sensitive Habitat Area Designations and Policy states:

CE 1.1 Definition of Environmentally Sensitive Habitat Areas. [GP/CP] ESHAs shall include, but are not limited to, any areas that through professional biological evaluation are determined to meet the following criteria:

b. Any area that includes habitat for species and plant communities recognized as threatened or endangered by the state or federal governments; plant communities recognized by the State of California (in the Terrestrial Natural Communities Inventory) as restricted in distribution and very threatened; and those habitat types of limited distribution recognized to be of particular habitat value, including wetlands, riparian vegetation, eucalyptus groves associated with monarch butterfly roosts, oak woodlands, and savannas.

The 0.61 acres of eucalyptus woodland onsite is not considered an ESH pursuant to the above criteria for the following reasons:

1. It has been substantially degraded and fragmented as a result of the prior gas station use and subsequent remediation activities.
2. Though it has periodically attracted individual raptor nesting, this activity has not consistently occurred throughout time, and the intensity of the nesting has been limited.
3. Eucalyptus woodland and raptor nesting habitat in the vicinity of the Project site is not restricted in its distribution. Substantial contiguous raptor nesting habitat exists within the Sandpiper Golf Course to the south, along the north side of Hollister Avenue and south of U.S. 101 adjacent to Haskells Beach Park and the Bacara Resort and Spa to the west, the Ellwood Mesa Preserve to the southeast, the Ellwood Mesa Preserve to the southeast, and between the Union Pacific Railroad tracks and US 101 extending to Ellwood School east of the Project site.

B-2. Draft EIR Section 4.2, Impact BIO-3, states,

“The potential exists for disturbance of active raptor nests and other bird nests in trees and shrubs within and adjacent to the Project site should construction occur during the bird breeding season (February 1- August 15). In addition, the GP/CLUP Conservation Element Policy 8.4 requires protection of active and historical raptor nest sites when feasible. In addition to the removal of eucalyptus and ornamental landscape trees, construction of the Project would require removal of all shrub and grassland vegetation onsite. Several different species of birds would potentially nest in the vegetation onsite and adjacent to the Project site. If nests were to exist when construction were undertaken, this action would result in a short-term *potentially significant impact* (Class II) on biological resources.”

As seen above, the Draft EIR does identify removal of the eucalyptus trees during the raptor nesting season as a potentially significant impact on biological resources.

According to Draft EIR testimony (Bill Shelor 2018, Steve Jolley 2018; see Section 7.0, Comment F-3 and F-24), a raptor nest has been observed onsite. The Draft EIR identifies that nesting raptors were observed in 2010, though not during 2016 birding surveys. It is reasonable to conclude that raptors periodically use the eucalyptus trees for nesting. Given this potential, Draft EIR Mitigation Measure BIO-3 requires that:

“Vegetation removal including clearing and grubbing and tree trimming shall avoid the bird nesting season (February 1st – August 31st) as

feasible to ensure protection of breeding birds potentially on site and directly east and north of the Project site during the site preparation and construction. If avoidance of the bird nesting season is infeasible, pre-construction breeding bird surveys shall be performed by a qualified, City-approved biologist. Nesting bird pre-construction surveys shall occur within the area to be disturbed and extend outward 500 ft. or to the property boundary.”

“If any occupied bird nests or cavity roosts are found, the biologist shall determine an appropriate buffer zone that considers the bird species, nest location, nest height, existing pre-construction level of disturbance in the vicinity of the nest, and proposed construction activities. A buffer ranging in size from 100 ft. for nesting passerine species to 500 ft. for nesting raptors shall be determined and demarcated by the biologist.”

These survey procedures are based on standard protocols promulgated by the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (USFWS 2014). The Winter and Nesting Raptor Survey Protocols attached to the CCC comment letter, however, have been incorporated as refinements to Draft EIR Mitigation Measure BIO-3 to comply with the CCC standard protocols. Revisions to Draft EIR Mitigation Measure BIO-3 are identified in underlined text below:

“A winter raptor survey shall be conducted between December 1 and February 15 performed by a qualified, City-approved biologist with formal training in avian biology, significant field experience in raptor survey techniques, and demonstrated ability to identify accurately local species under a variety of field conditions. The survey shall consist of at least five visits, spaced at least one week apart. Each visit shall consist of at least two hours on site during the period between dawn and 10:00 am. The biologist shall specifically search for foraging birds and birds using trees for perching, roosting, or nesting. The survey report shall provide a list of species that could reasonably be expected to use habitats on the site under other probable winter weather or prey conditions, and a list of wintering species that are known to have used the site in the past.”

Vegetation removal including clearing and grubbing and tree trimming shall avoid the bird nesting season (February 1st – August 31st) as feasible to ensure protection of breeding birds potentially on site and directly east and north of the Project site during the site preparation and construction. If avoidance of the bird nesting season is infeasible, pre-construction breeding bird surveys shall be performed by a qualified, City-approved biologist with formal training in avian biology, significant field experience in raptor survey techniques, and demonstrated ability to identify accurately local species under a variety of field conditions. Nesting bird pre-construction surveys shall occur within the area to be disturbed and extend outward 500 ft. or to the property boundary. The survey shall be conducted between March 1 and June 15. The survey

shall consist of at least five visits, spaced at least one week apart. Each visit shall consist of at least two hours on site during the period between dawn and 10:00 am. The biologist shall specifically search for nests and for foraging birds and birds using trees for perching, roosting, or nesting. The survey report shall provide a list of species that could reasonably be expected to use habitats on the site under other probable weather or prey conditions, and a list of species that are known to have used the site in the past.

Plan Requirements and Timing: The applicant shall submit a winter raptor survey and a nesting raptor survey plan, including the name and qualifications of the biologist that will conduct such survey, to the California Coastal Commission (CCC) Executive Director and the City for staff review and approval. The results of the survey shall be submitted to the CCC Executive Director and City for staff review and approval prior to the issuance of any grading or building permits.

The residual impact of this feasible mitigation is refined in the Final EIR, as stated below:

Implementation of Mitigation Measure BIO-3 would reduce the potential to disturb sensitive bird nesting during construction. The residual impact on biological resources would be *adverse, but feasibly mitigated to less than significant* (Class II). Future raptor nesting would feasibly continue within eucalyptus woodland and raptor nesting habitat in the vicinity of the Project site including the Sandpiper Golf Course to the south, along the north side of Hollister Avenue and south of U.S. 101 adjacent to Haskells Beach Park and the Bacara Resort and Spa to the west, the Ellwood Mesa Preserve to the southeast, and between the Union Pacific Railroad tracks and US 101 extending to Ellwood School east of the Project site.

- B-3** The Draft EIR Section 5.1 presents and explains in detail guidance provided in CEQA Guidelines Section 15162 regarding the criteria for selection of alternatives. The Draft EIR states:

“The analysis of project alternatives in this EIR focuses on a reasonable range of alternatives consistent with CEQA Guidelines Section 15126.6(a). Accordingly, Section 15126.6(a) states:

“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. The lead agency is responsible for selecting a

range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

As noted above, a reasonable range of project alternatives must “feasibly attain most of the basic objectives of the project.” Draft EIR Section 2.6.1, Project Description, Construction, explains that removal of the eucalyptus trees on site is necessary to achieve compliance with The Essential Services Buildings Seismic Safety Act of 1986 (Health & Safety Code Division 12.5, Chapter 2, Article 1, Section 16001). The Draft EIR explains that the Act...

“states that essential facilities such as Fire Station 10 shall be designed and constructed to minimize fire hazards,’ and that nonstructural components vital to the operation of essential services buildings shall be able to resist, insofar as practical, the forces generated by fire and winds. The Act provides local discretion in determining how minimizing fire hazards can be accomplished. The SBCFD Fire Marshal has determined that existing eucalyptus trees on the Fire Station 10 Project site are a fire hazard given their potential flammability (Division Chief/ Fire Marshall Steve Oaks, SBCFD, personal communication 2017). A previous tree survey of the Project site (Robert Muraoka, 2016) identified numerous dead eucalyptus trees, and others where several large branches had failed and broken off. These large limbs may pose potential hazards to adjacent land uses. Trimming of large eucalyptus tree limbs along the eastern Project site boundary has occurred as the request of adjacent The Hideaway neighbors. Therefore, existing eucalyptus woodland totaling 56 eucalyptus trees, as well as other potentially flammable vegetation including coastal sage scrub and non-native grassland, would be removed from the Project site to ensure fire hazards are minimized pursuant to the Essential Services Act.”

Therefore, removal of the existing eucalyptus trees onsite is required to meet the basic project objectives of the proposed fire station.

The Draft EIR Section 5.2.2, Minimize Potentially Significant Environmental Impacts, does include discussion that the “Removal of eucalyptus tree clusters could potentially result in the loss of raptor nests (Impact BIO-3).” However, it is not feasible to avoid this tree removal without failing to meet a basic objective of the proposed Project, compliance with The Essential Services Buildings Seismic Safety Act of 1986, as explained above. The necessity to achieve this basic project objective is included in the revised Final EIR, Section 5.2.2, Minimize Potentially Significant Environmental Impacts in underlined text:

“The potentially significant environmental impacts associated with the proposed Fire Station 10 project are exclusively associated with the project location, rather than size, bulk, or appearance. For example, there is no potential impact resulting from the size or intensity of the

station's use that would result in impacts on air quality, greenhouse gas emissions, operational noise, or transportation/circulation. Removal of the 56 eucalyptus trees onsite (Impact BIO-3) is required to achieve compliance with The Essential Services Buildings Seismic Safety Act of 1986, as the SBCFD Fire Marshal has determined that existing eucalyptus trees on the Fire Station 10 Project site are a fire hazard given their potential flammability (Division Chief/ Fire Marshall Steve Oaks, SBCFD, personal communication 2017) (see Section 2.6.1, Project Description, Construction). Therefore, existing eucalyptus woodland totaling 56 eucalyptus trees, as well as other potentially flammable vegetation including coastal sage scrub and non-native grassland, would need to be removed from the Project site to ensure fire hazards are minimized pursuant to the Essential Services Act. This is considered a basic project objective such must be retained in any feasible onsite project alternative.

Feasible fire station design must include sufficient square footage for three emergency vehicle bays in the main building, as well as space for on-call personnel. Space requirements include sufficient area for vehicular access to Hollister Avenue, where a clear zone would be established for emergency vehicles leaving the fire station bays, and for the internal access turnaround geometry to accommodate fire truck refueling. The proposed fire station parcel size was selected given that it provided sufficient area for these required space needs, but does not have excess area for substantial avoidance of onsite eucalyptus trees. Relocation of the fire station structural footprint westward to avoid existing eucalyptus trees would not provide for a sufficient setback of the vehicle bay egress from the intersection of Hollister Avenue and Cathedral Oaks Road. Given the limited acreage of the Project site and infrastructure space requirements, any reduction in the proposed structural footprint, internal access road and paved areas is infeasible. Therefore, no additional on-site project alternatives are feasible.

Draft EIR Alternatives Section 5.2.1 Basic Project Objectives, has been augmented to provide greater clarity to these proposed Fire Station 10 space requirements. Added text is underlined.

“5.2.1 Basic Project Objectives

The first step in determining a reasonable range of alternatives to be analyzed is to consider the basic project objectives as previously defined in Section 2.3. These are summarized below:

1. Add a new three-person fire station crew on duty around the clock;...

“Objective No. 1 dictates the minimum size required of the proposed Fire Station and its location.

- The proposed facility must be sufficiently large enough to provide for the three-person fire station crew;

- Sufficient area is required to establish a clear zone with adequate sight distance for vehicular access to Hollister Avenue for emergency vehicles leaving the fire station bays; and
- Sufficient area is required for the internal access turnaround geometry to accommodate fire truck refueling.

B-4 Please see response to comment B.3. Draft EIR Impact BIO-3 identifies that removal of onsite eucalyptus trees is a significant impact if raptor nesting is occurring during construction, and provides feasible mitigation to address this potentially significant impact (as revised in response to comment B.2). Preservation of eucalyptus trees onsite does not represent a feasible alternative as defined by CEQA Guidelines Section 15126.6(a), as it would not meet a basic objective of the proposed fire station project. Replacement vegetation including screen trees along the eastern and northern Project boundaries would provide comparable raptor roosting opportunities as well.

B-5 Please see response to comment B.2. Draft EIR Mitigation Measure BIO-3 has been revised to incorporate CCC winter raptor survey and a nesting raptor survey protocols.

B-6 Draft EIR Section 5.2.2 explains that,

“The former California Highway Patrol (CHP) Relocation Site (7781 Hollister Avenue, APN 079-210-056)... does not have the ability to obtain a Goleta Water District (GWD) meter. The state-owned site does not have an historic account, and therefore is subject to the GWD current voter-mandated current prohibition on new connections (Ryan Drake, 2015). As a result, Alternative No. 2 would not be feasible in the foreseeable future for operation of Fire Station No. 10. It is therefore not considered further in this analysis.”

The State of California requested that an existing GWD meter be transferred from the existing CHP facility on Calle Real to their proposed relocation site at 7781 Hollister Avenue. The GWD (Ryan Drake, 2015), however, informed the State that,

“However, pursuant to District Code, Section 5.04.010(J) an Active Service Connection may only be used to serve a parcel of land that was served by that Active Service Connection prior to June 4, 1991, or the property specifically approved for water service after that date. In addition, Section 5.08.030.D, provides that water allocated pursuant to a Final Can and Will Serve Letter cannot be transferred to another parcel of real property.”

The Draft EIR section 5.2.2. has been revised to include this information, as identified in underlined text.

Preliminary analysis of Alternative No. 2, the former California Highway Patrol Relocation Site (7781 Hollister Avenue, APN 079-210-056), determined that the parcel does not have the ability to obtain a Goleta Water District (GWD) meter. The state-owned site does not have an historic account. Pursuant to GWD District Code, Section 5.04.010(J), an Active Service Connection may only be used to serve a parcel of land that was served by that Active Service Connection prior to June 4, 1991, or the property specifically approved for water service after that date. In addition, Section 5.08.030.D provides that water allocated pursuant to a Final Can and Will Serve Letter cannot be transferred to another parcel of real property. The site is subject to the GWD current voter-mandated current prohibition on new connections (Ryan Drake, 2015). As a result, Alternative No. 2 would not be feasible in the foreseeable future for operation of Fire Station No. 10. It is therefore not considered further in this analysis.

June 22, 2018

Laura Bridley
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

Re: APCD Comments on the Draft Environmental Impact Report for the City of Goleta Fire Station 10 Project, SCH No. 2017081066

Dear Ms. Bridley:

The Air Pollution Control District (APCD) has reviewed the Draft Environmental Impact Report (EIR) for the referenced project, which consists of the construction of a one-story, three apparatus bay fire station of approximately 11,600 square feet. Fire Station 10 infrastructure would include a bifurcated above-ground fuel tank (250-gallon gasoline and 1,000-gallon diesel), an emergency generator, and outside hose drying racks as well as a Community/Training Room. The subject property, a 1.21-acre parcel zoned Limited Commercial (C-1) and identified in the Assessor Parcel Map Book as APN 079-210-075, is located at 7952 Hollister Avenue in the City of Goleta.

The proposed project includes an emergency generator that is subject to APCD permit requirements and prohibitory rules. Therefore, APCD is a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the EIR when evaluating any APCD permits for proposed equipment.

The Draft EIR adequately addresses short-term and long-term air quality and greenhouse gas impacts associated with the proposed project.

APCD has only one comment on the Draft EIR related to the Health Risk Assessment performed for the operation of the emergency generator. Risk values from the emergency generator were estimated in the Draft EIR using an outdated methodology. APCD has run the analysis using the most current HRA screening model and software. This analysis is provided for inclusion in the Final EIR (see Attachment A). The revised analysis indicates that the proposed periodic testing of the diesel engine passes the screening with maintenance and testing of 50 hours per year, typical for this kind of equipment and its application. Please note that no new significant impacts result from this reassessment.

If you have any questions regarding these comments, please feel free to contact me at (805) 961-8890 or via email at BarhamC@sbcapcd.org.

Sincerely,



Carly Barham
Technology and Environmental Assessment Division

Attachments: Goleta Fire Station 10 HRA Documentation
cc: TEA Chron File

Attachment A: Goleta Fire Station 10 HRA Documentation

1.0 SUMMARY

An air toxics Health Risk Assessment (HRA) screening was conducted by the Santa Barbara County Air Pollution Control District (District) for the diesel-fired internal combustion engine (DICE) associated with the proposed City of Goleta Fire Station 10 at 7952 Hollister Ave. The HRA screening was conducted using the USEPA-recommended screening model, AERSCREEN, with the Hotspots Analysis and Reporting Program (HARP) software, Version 2 (Build 17320). Cancer risk and chronic non-cancer Hazard Index (HI) risk values were calculated and compared to *significance thresholds* for cancer and chronic non-cancer risk adopted by the District’s Board of Directors. The calculated risk values and applicable thresholds are as follows:

	<u>Fire Station 10 DICE Max Risks</u>	<u>Significance Threshold</u>
Cancer risk:	5.1/million	≥10/million
Chronic non-cancer risk:	<0.1	>1

Based on these results, the proposed DICE at City of Goleta Fire Station 10 does not present a significant risk to the surrounding community. The District has not yet received an Authority to Construct (ATC) application for this project. When the ATC application is received, the District will review the submitted information and determine if the HRA screening described in this document is appropriate for the ATC. The District may perform another HRA screening for the ATC if deemed necessary.

2.0 MODELING INFORMATION

The stack parameter inputs to AERSCREEN View are outlined in Table 2.1.

Table 2.1 – Summary of Stack Parameter Inputs

Source ID	Source Type	Release Type	Release Height (ft)	Temperature (°F)	Velocity (ft/s)	Diameter (ft)
STCK1	POINT	Capped	7.4	899	141.6	0.342

The rural option was enabled, and a flagpole height of 1.5 meters was used for all receptors. The AERSURFACE output file for the Santa Barbara Airport meteorological data from 2014 was used. The closest residential receptor at 90 m and the closest worker receptor at 130 m from the source were included. The inversion break-up fumigation and shoreline fumigation options were not enabled. Terrain effects were not included in the model. Building downwash was included, and the building information can be found in the spreadsheet titled *GoletaFireStation10Building.xlsx*, located in the folder referenced in Section 6.0 of this document.

After the pollutant concentrations were entered into HARP 2, the cancer risk was determined at the maximally exposed individual resident (MEIR) using the “individual resident” receptor type and the breathing rate from the “RMP using the Derived Method” for an exposure duration of 30 years. Under the inhalation pathway, the fraction of time at home (FAH) values were not applied for any age bins. The cancer risk was also determined at the maximally exposed individual worker (MEIW) using the “worker” receptor type and the breathing rate from the “OEHHA Derived Method” for an exposure duration of 25

years. The chronic non-cancer hazard index was calculated for the MEIR using the “individual resident” receptor type and the breathing rate from the “OEHHA Derived Method.” The chronic non-cancer hazard index was also calculated for the MEIW using the “worker” receptor type and the breathing rate from the “OEHHA Derived Method.” The only exposure pathway analyzed was the inhalation pathway because Diesel PM is not a multipathway pollutant. A list of multipathway pollutants can be found in Table 5.1 of OEHHA's 2015 Guidance Manual, which is included in Section 3.4 of the District’s *Modeling Guidelines for Health Risk Assessments*, referenced in Section 5.0 of this document.

3.0 EMISSIONS

An engine has not yet been selected for this project. Section 2.6.2 of the Draft EIR dated May 2018 states that “The emergency generator is conservatively estimated to have a 150-kW capacity.” The electrical capacity of 150 kW was converted to equal approximately 239 bhp using the methodology described below. Equation 3.1 comes from the District’s *Diesel Engine ATCM FAQ #2 (ver 1.0)*. The efficiency of the engine was assumed to be 84 percent because the engine will likely be a newer model.

$$B = E * \frac{1}{e} * C \quad (\text{Eq. 3.1})$$

where: B = estimated size of engine (bhp)
 E = electrical power of engine (kW)
 e = engine efficiency

$$C = \text{conversion factor} = \frac{1 \text{ bhp}}{0.7457 \text{ kW}}$$

$$B = 150 \text{ kW} * \frac{1}{0.84} * \frac{1 \text{ bhp}}{0.7457 \text{ kW}} = 239 \text{ bhp}$$

The District typically permits new emergency standby DICE to operate for a maximum of 50 hours per year for maintenance and testing purposes. Therefore, 239 brake horsepower, 50 hours per year, and the ARB’s *Airborne Toxic Control Measure for Stationary Compression Ignition Engines* particulate matter (PM) emission standard of 0.15 g/bhp-hr were used to calculate the annual emissions of diesel PM. The calculated emissions for this DICE are shown in Table 3.1.

Table 3.1 – Facility Emissions Summary

Pollutant	Emissions (lb/yr)
Diesel PM	3.95

4.0 RESULTS

The cancer and chronic non-cancer risks are higher at the maximally exposed individual resident (MEIR) than at the maximally exposed individual worker (MEIW). Table 4.1 displays the cancer and chronic non-cancer risk results at the MEIR. All of the calculated risk values are below the District’s significance thresholds.

Table 4.1 – Summary of Screening Tool Results

Pollutant	C _{annual} at MEIR (µg/m ³)	Cancer Risk (per million)	Chronic Non-Cancer Risk (Hazard Index)
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Diesel PM	0.00670	5.08	0.001
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5.0 REFERENCES

- Risk notification levels were adopted by the Santa Barbara County Air Pollution Control Board of Directors on June 1993. The risk notification levels were set at 10 per million for cancer risk and a Hazard Index of greater than 1.0 for non-cancer risk.
- Air Resources Board. May 2011. “Final Regulation Order: Amendments to the Airborne Toxic Control Measure for Stationary Compression Ignition Engines.”
<https://www.arb.ca.gov/diesel/documents/FinalReg2011.pdf>.
- Office of Environmental Health Hazard Assessment. February 2015. “Air Toxics Hot Spots Program: Risk Assessment Guidelines.” California Environmental Protection Agency.
<http://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>.
- Santa Barbara County Air Pollution Control District. May 2018. “Modeling Guidelines for Health Risk Assessments.” <http://www.ourair.org/wp-content/uploads/apcd-15i.pdf>.
- Santa Barbara County Air Pollution Control District. “Diesel Engine ATCM FAQ #2 (ver 1.0).”
https://www.ourair.org/wp-content/uploads/dice_atcm_faq2_ver_1.0.pdf.

6.0 ATTACHMENT

The DICE Screening Tool spreadsheet for this project may be found in the following location:
<\\sbcapd.org\shares\Toxics\SourceFiles\CEQA\Goleta Fire Station 10\Refined Screening>

C. Santa Barbara County Air Pollution Control District (Carly Barham, Technology and Environmental Assessment Division), June 22, 2018

C-1. The Draft EIR Section 2.7 Required Approvals has been revised as stated below:

“**Authority to Construct (ATC) Permit.** The Santa Barbara County Air Pollution Control District would issue an ATC for the proposed emergency generator.

C-2. No revisions to the Draft EIR are required.

C-3. The Draft EIR used risk values for the proposed emergency generator that were posted on the Santa Barbara County Air Pollution Control District (SBAPCD) website when the screening analysis was undertaken in February 2018. The efforts of the SBAPCD to provide this updated Health Risk Assessment (HRA) screening analysis are appreciated.

Draft EIR Section 4.10 Impact AQ-2 has been revised as identified in underlined (new) and strikeout (deleted) text:

An air toxics Health Risk Assessment (HRA) screening was conducted by the SBAPCD for the proposed diesel-fired internal combustion engine (DICE) (Carly Barham, SBAPCD 6/22/18; see Draft EIR Comment C). The HRA screening was conducted using the USEPA-recommended screening model, AERSCREEN, with the Hotspots Analysis and Reporting Program (HARP) software, Version 2 (Build 17320). Cancer risk and chronic non-cancer Hazard Index (HI) risk values were calculated and compared to significance thresholds for cancer and chronic non-cancer risk adopted by the District’s Board of Directors. The calculated risk values and applicable thresholds are summarized in Table 4.10-4 (calculations are provided in Appendix H, Section 10.1).

~~The SBCAPCD Rule 802 New Source Review Best Available Control Technology (BACT) Thresholds (SBCAPCD 2016) were used to determine the significance of emissions associated with the emergency generator since it would be operating on a periodic, temporary basis during emergency situations. Emissions from the emergency generator were estimated using CalEEMod software and are determined to be below the thresholds, as summarized in Table 4.10-4.¹ Therefore, Emissions are not expected to contribute to or cause an exceedance of adopted thresholds of significance or AAQS and would be considered *adverse, but less than significant* (Class III).~~

¹ Generator-specific emissions calculations can be located in Section 10.1 in Appendix H.

**Table 4.10-4. Maximum daily Estimated Emissions
for Emergency Generator**

<u>Pollutant</u>	<u>C_{annual} at MEIR (µg/m³)</u>	<u>Cancer Risk (per million)</u>	<u>Chronic Non- Cancer Risk (Hazard Index)</u>
Diesel PM	0.00670	5.08	0.001

Duration	Source	Pollutant (lbs/day)			
		ROC, SO _x and NO _x (sum)	CO	PM ₁₀	PM _{2.5}
Temporary (emergency only)	Emergency Generator (Diesel)	40.0	6.70	0.39	0.39
SBCAPCD PST BACT Threshold		120	500	80	55
Significant?		NO	NO	NO	NO

“The inhabited spaces of the fire station would be located approximately 120 feet from the emergency generator, while the nearest residences of the Hideaway residences would be located approximately 315 feet from the emergency generator. Based on utilization of CARB “Hot Spots” Stationary Diesel Engine Screening Risk Assessment, that distance from the generator would result in an estimated increased cancer risk of ~~four~~ 5.08 in one million ~~for fire station employees and two in one million~~ for the nearest Hideaway residences sensitive receptors, below the CARB cancer risk threshold of significance of 10 in one million. The cancer and chronic non-cancer risks at the maximally exposed individual worker (MEIW) are lower. Because the primary source of concern for the Project is operation of the emergency diesel generator and the cancer effects from diesel PM generally drive the risk from diesel engines, chronic and acute non-cancer risks of the Project are not are expected to exceed SBCAPCD public health risk notification thresholds and are not considered in this analysis. This The SBCAPCD analysis assumes a non-emergency annual operation time of ~~40~~ 50 hours, rather than planned operations of 30 minutes monthly (6 hours annually), and an additional 2-hour test every year for a total of 8 hours. Therefore, even with assuming an extremely conservative assumption of emergency diesel generation testing activity, potential impacts on air quality would be adverse, but less than significant (Class III).”

Although this screening-level analysis identifies further health risk analysis would not be required and associated impacts are not considered to be significant, SBCAPCD may determine though its Authority to Construct permit review process that additional screening health risk assessment will be required for the proposed Project. The District may perform another HRA screening for the ATC if deemed

necessary (Carly Barham, SBCAPCD 6/22/18; see Draft EIR Comment C).”

Comment regarding Draft EIR, Fuire Station #10, 7952 Hollister Avenue, Goleta Case No. 17-069-DRB & 17-044-GPA/RZ/DP

Rejzek, Tom [Tom.Rejzek@sbcphd.org]

Sent: Thursday, June 28, 2018 4:08 PM

To: Laura Bridley

Laura-

The Santa Barbara County Environmental Health Services Site Mitigation Unit and Leaking Underground Fuel Tank Programs (EHS) has review the Draft EIR for the above referenced site. EHS has the following comments:

1. A Chevron Service Station formerly occupied the site. The site was remediated under the State Water Resource Control Board's Low Threat Closure Policy (LTCP). The LTCP allows contamination to be left in place based upon current site use. At the time of closure, the site was vacant with an expected land use as a fire station. EHS has re-reviewed the site data with respect to the proposed development and building configuration. Based upon the plans presented in the Draft EIR, the leaking underground fuel tank case still meets LTCP criteria for case closure. No further environmental investigation or remediation, with respect to the known residual soil contamination, is warranted at this time.
2. There is always a possibility that previously unidentified soil contamination related to the former Chevron Station may be encountered during site redevelopment. If this occurs, EHS requires that work in this area stop and our office be notified immediately.

If you have any question regarding the aforementioned, please feel free to contact me.

Sincerely,

Thomas M. Rejzek
Professional Geologist #6461
Certified Hydrogeologist #601
Santa Barbara County Environmental Health Services
LUFT/SMU Program
805-346-8216 Office
805-346-8485 Fax
805-896-6348 Cell

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JUN 29 2018

Neighborhood Services &
Public Safety Dept.

D-1. The Draft EIR Section 4.5.1 Hazards and Hazardous Materials, Existing Setting explains that,

“In 2007, a Phase I environmental site assessment was completed for the Project site.... Soil vapor extraction was used to remediate the contaminated soils, from August 2010 to June 2011... TPH as gasoline, benzene, and methyl tertiary butyl ether (MTBE) were detected at concentrations of 20,700 mg/kg, 52 mg/kg, and 0.28 mg/kg, respectively. Those samples also contained N-butylbenzene, sec-butylbenzene, tert-butylbenzene, naphthalene, isopropylbenzene, n-propylbenzene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene, at concentrations that correlated to samples containing elevated TPH as gasoline and benzene concentrations. The area of elevated petroleum hydrocarbon contamination was determined to be localized, with an estimated volume of less than 400 cubic yards (Holguin, Fahan & Associates 2012, Appendix F).

Soil vapor extraction was used to remediate the contaminated soils, from August 2010 to June 2011. Soil samples collected from subsequent confirmation borings indicated concentrations of petroleum hydrocarbons in excess of FPD SILs. However, the FPD agreed (with Holguin, Fahan & Associates) that the soil vapor extraction system had removed over 90 percent of the initial mass of contaminated soil and concurred that further corrective action was not warranted. A sensitive receptor survey was completed, based upon readily available public records, site and vicinity inspections, and site assessment results. Based on the residual soil contamination and sensitive receptor survey, a low-risk case closure summary was presented to the FPD. The summary concluded that the Project site has been adequately assessed and that the residual hydrocarbons in soil do not pose a significant threat to human health, to beneficial or potentially beneficial groundwater, or to the environment. As such, Chevron and Holguin, Fahan & Associates requested that the FPD review the site for low-risk closure. Site closure was granted by the FPD in a letter dated February 21, 2012 (Holguin, Fahan & Associates 2012, Appendix F). Site closure was granted by the FPD in a letter dated February 21, 2012.”

The Santa Barbara County Fire Protection District (FPD), the agency with jurisdiction over contaminated site remediation, previously issued site closure on required remediation of contaminated onsite soils. No further agency approvals are required.

D-2. The Draft EIR Section 4.5.3 Impact Analysis, Impact HAZ-1, states,

”Following multiple phases of environmental site assessments and soil remediation, using soil vapor extraction technology, Santa Barbara County FPD indicated that the remediation system had removed over 90 percent of the initial mass of contaminated soil and that further corrective action was not warranted. The remaining soil contamination

is approximately 15 to 20 feet below ground surface. A sensitive receptor survey, based upon readily available public records, site and vicinity inspections, and site assessment results, concluded that the Project site was adequately assessed and that the residual hydrocarbons in soil do not pose a significant threat to human health, to beneficial or potentially beneficial groundwater, or to the environment. County FPD agreed with this synopsis and as a result, site closure was granted by the FPD in a letter dated February 21, 2012.

Based on the completed remediation efforts that have been approved by County FPD described above, the potential of encountering previously unidentified soil contamination onsite is considered extremely unlikely. Standard protocols for contacting Santa Barbara County FPD and EHS will be followed in the remote potential that unexpected contamination is encountered.



Santa Barbara Audubon Society

A Chapter of the National Audubon Society

PO Box 5508
Santa Barbara, CA 93150
www.santabarbaraaudubon.org

Date: June 14, 2018

To: City of Goleta Staff & City Council

Re: Comments on Fire Station 10 DEIR

Dear City of Goleta Staff and City Council,

This letter provides brief comments of the Santa Barbara Audubon Society (SBAS) regarding the City's Draft Environmental Impact Report (DEIR) on the Fire Station 10 project. SBAS works to connect people with birds and nature through education, science-based projects, and advocacy. SBAS has been a voice for the natural world in the Santa Barbara area for more than 50 years and has over 1100 members, including hundreds in the City of Goleta.

SBAS fully supports this project and generally endorses the analysis and conclusions of the DEIR with respect to the project's potential environmental impacts. We would, however, call your attention to the point noted in the report regarding the uncertainty around whether or not the subject property's coastal sage scrub habitat meets the definition of Environmentally Sensitive Habitat Area (ESHA) and is thereby afforded protections under the Conservation Element of the Goleta General Plan. Given this uncertainty, the DEIR notes (in the Appendix C, p. 20 discussion of General Plan policies CE5.1 and CE5.3) that "the City must determine whether this policy applies to the sage scrub vegetation present on this project site." We would strongly encourage the City to follow through on this determination, so as to ensure that the City does not set a precedent of allowing development in a Coastal Zone ESHA.

Additionally, despite the DEIR's conclusion (Appendix C, p. 22) that no mitigation of the project's planned vegetation removal is required, and given that the current landscape plan (as presented in DEIR Fig. 2-11) calls only for "a mixture of native and drought tolerant plantings" around the main structure and screening vegetation that includes just one locally native tree species (Coast live oak), we would encourage the City to consider a landscaping/mitigation strategy that would maximize ecological value by ensuring a predominantly native plant palette. Examples of the variety of drought-tolerant and low-maintenance locally sourced native plants (including coastal sage scrub species) that could serve this goal can be found in Exhibit 1 of the June 2014 *Ellwood Mesa Coastal Trails & Habitat Restoration Project Final Initial Study and Mitigated Negative Declaration* (<http://www.cityofgoleta.org/home/showdocument?id=8905>).

Finally, and as has been requested previously by others, we would urge the City to try to preserve as many trees as possible on the subject property, to the extent that they are professionally evaluated as not presenting a risk to nearby structures. We offer this suggestion on the basis of the general principle of tree preservation whenever feasible, as well as for reasons of both aesthetics and maintaining as much natural shade as possible in an otherwise highly exposed area.

SBAS appreciates the opportunity to comment on this project. Please do not hesitate to contact us if further clarification on any of these points is desired.

Sincerely,

A handwritten signature in black ink, appearing to read "Cherie Topper", written over a horizontal line.

Cherie Topper, Santa Barbara Audubon Society Executive Director

**E. Santa Barbara Audubon Society (Cherie Topper, Executive Director)
June 14, 2018**

E-1. The Draft EIR Section 4.2.2 Biological Resources Project Site Setting, states:

“GP/CLUP Conservation Element CE 1.3 requires a site specific biological study to determine if un-mapped ESHA occurs within a proposed Project site. Based on the list of designated ESHAs included in CE 1.2, the coastal sage scrub habitat within the Project site is potentially considered ESHA; however, this habitat is not designated as ESHA in the GP/ CLUP map (Figure 4.2-1). The coastal sage scrub present within the Project site is limited to small, isolated patches that are dominated by California sagebrush, coyote brush, and California buckwheat. The coastal sage scrub habitat present within the Project site is best characterized as *Artemisia californica* (California sagebrush scrub) alliance by the List of Vegetation Alliances and Associations (CDFG 2010), which replaced all other lists of terrestrial natural communities and vegetation types. This alliance is a State Rarity Rank S5 habitat type and is therefore not considered rare or a special community within the state. Due to the size and location of the coastal sage scrub habitat, it is not determined to be especially valuable and is not expected to provide habitat for state or federally listed plant or wildlife species. For the reasons described above, the coastal sage scrub habitat present within the Project site is determined to not meet the criteria for designation as ESHA.”

No additional analysis is required relative to the determination of coastal sage scrub habitat as ESHA.

E-2. The proposed Project landscape plan has been revised (see Figure 2-11) to substantially increase the number of native screen trees and tall shrubs that would be planted on the eastern and northern project boundaries. The Draft EIR Section 2.6.5 Landscaping Plan has been revised (revised text is underlined and deleted text is struck out) as follows:

“The areas adjacent to and around the structure and exterior facilities would be landscaped with a mixture of native and drought tolerant plantings (see Figure 2-11). The planting design would provide appropriate examples of fuel management plant design materials to be used in the three different Project site planting zones. Screening vegetation along the northern and eastern property boundary, including large ~~three (3) 24- to 36-~~ to 48-inch box specimen native Monterey cypress, five (5) 48-inch box native coast live oak, six (6) 36-inch box native coast live oak, and fourteen (14) 24-inch box *Arbutus marina* (Marina strawberry) New Zealand Christmas trees, would achieve a height of between 30 to 50 feet. Thirty-five (35) native lemonade berry bushes would be planted between the specimen trees and achieve a height of 10 feet. One Monterey cypress, one (1) 36-inch box coast live

oak, four (4) *Arbutus marina* trees, and sixteen (16) lemonade berry bushes would be planted along the eastern project boundary. One (1) 36-inch box coast live oak, five (5) 24-inch box coast live oak, and nineteen (19) lemonade berry bushes would be planted along the eastern project boundary.

The linear arrangement of large screen trees and bushes would be complimented by smaller native and drought-tolerant shrubs reaching 12 to 20 feet high. The landscaping would provide a visual separation between the fire station institutional uses and The Hideaway residential development to the east, and southerly views from US 101 and residential neighborhoods to the north. Other native and drought-tolerant shrubs would be planted in landscaping experienced from Hollister Avenue looking northward.

The revised landscape plan includes over 70 percent Santa Barbara native landscape trees and tall shrubs (replacing the 56 non-native eucalyptus trees to be removed). Native Santa Barbara understory and ground cover plantings include locally native yarrow shrubs, California meadow sage (*Carex pansa*), and California grey rush grasses (*Juncus patens*, *Leymus condensatus*).

- E-3.** Draft EIR Section 2.6.1, Project Description, Construction, explains that removal of the eucalyptus trees on site is necessary to achieve compliance with The Essential Services Buildings Seismic Safety Act of 1986 (Health & Safety Code Division 12.5, Chapter 2, Article 1, Section 16001). The Draft EIR explains that the Act...

“states that essential facilities such as Fire Station 10 shall be designed and constructed to minimize fire hazards,’ and that nonstructural components vital to the operation of essential services buildings shall be able to resist, insofar as practical, the forces generated by fire and winds. The Act provides local discretion in determining how minimizing fire hazards can be accomplished. The SBCFD Fire Marshal has determined that existing eucalyptus trees on the Fire Station 10 Project site are a fire hazard given their potential flammability (Division Chief/ Fire Marshall Steve Oaks, SBCFD, personal communication 2017). A previous tree survey of the Project site (Robert Muraoka, 2016) identified numerous dead eucalyptus trees, and others where several large branches had failed and broken off. These large limbs may pose potential hazards to adjacent land uses. Trimming of large eucalyptus tree limbs along the eastern Project site boundary has occurred as the request of adjacent The Hideaway neighbors. Therefore, existing eucalyptus woodland totaling 56 eucalyptus trees, as well as other potentially flammable vegetation including coastal sage scrub and non-native grassland, would be removed from the Project site to ensure fire hazards are minimized

pursuant to the Essential Services Act.”

Therefore, removal of the existing eucalyptus trees onsite is required to meet the basic project objectives of the proposed fire station.

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JUN 12 2018

Neighborhood Services &
Public Safety Dept.

Robert K. Miller
30 Sanderling Lane
Goleta, CA 93117
rmiller2014@gmail.com

June 11, 2018

City of Goleta
Neighborhood Services and Public Safety Department
130 Cremona Drive - Suite B
Goleta, CA 93117

Attn: Laura Bridley, AICP, Project Planner

Subject: Fire Station 10 Draft Environmental Impact Report (EIR)

Several residents of the Hideaway community have reviewed the Draft EIR for the Fire Station 10 project and expressed a number of concerns. They asked me to present everyone's concerns in a single document. Please note, however, that their comments do not reflect an official position of The Hideaway Community Association nor represent the views of all Hideaway resident.

I received the following questions and comments:

1. **Storm water drainage is a concern.** There has been flooding at the southeast corner of the Fire Station 10 lot. This has required sandbags along the rear fence behind 7930 Whimbrel lane to prevent water intrusion. It appears from the drawings that there will be additional fill dirt brought in to raise the area directly behind the Hideaway property by 5 feet (raising the grade from 115 to 120 per figure 2-7 and 2-5b in the DEIR Part1). We have a concern that raising this area may not be sufficient to prevent heavy rains from draining onto our property.

The drawings show a new steep bank from the added fill dirt in the 10ft green zone directly behind the existing Hideaway fence. The land will rise 5 feet to the new FS10 driveway resulting in a steep slope in the narrow green zone. Can the drainage be worked out without raising up this area and utilizing the existing or improved drainage into a storm drain? Keeping the FS10 driveway at the existing grade would be better visually to help maintain our current southerly views, and also reduce the steepness of the slope in this narrow green zone. The soil on the Hideaway property is mostly clay and does not absorb water very well. When the ground is saturated, the drainage needs be sufficient to not pool and have sufficient flow without impacting our property.

On page ES-3 there is discussion of a bio-retention basin on the west side of the fire station for storm water drainage. Could a similar retention basin be installed on the east side as well to handle the storm run-off there, without the additional need for fill dirt being brought in? Have alternative approaches to drainage been studied?

Is the green zone still 10ft wide, or is it actually 8.8 ft as shown on figure 2-5? Could the 22 ft width of the FS10 driveway be reduced, resulting in an expanded green zone with less slope?

1. The drawings show **5 New Zealand Christmas trees** planted along the east perimeter in the green zone directly behind the Hideaway rear fence. As stated they can reach 80ft tall and we fear that the resulting canopy would intrude over our back yards blocking out the sun. We are also not sure about the droppings from their flowers, the possible root incursions and the additional need to replant our existing back yards to be tolerant to the shade from these trees. We think a smaller medium size tree would be more appropriate in the green zone. Possibly the large New Zealand Christmas trees could be planted along the front and rear of the Fire Station, but smaller trees planted along the eastern perimeter in the green zone. We recommend further studies of the trees showing details of the

canopy, droppings, and root incursions, with some alternative medium size tree recommendations for the green zone.

2. Will there be a **separate fence erected** adjacent to the Hideaways wall and wrought iron fence? Will the driveway gate match the Hideaway wrought iron fence design or otherwise maintain our views?
3. Will **security cameras** be directed into the Hideaway back yards and homes? Will the parking lot lighting shine directly into our homes, or be directed downward only?
4. If **gophers** are currently present in the soil can efforts be made to keep them from migrating into the neighboring Hideaway property during the grading and construction process?
5. In an earlier letter, for aesthetic and shade reasons, we requested that the city **save as many trees** as possible to the extent they don't present a risk of falling on nearby structures and/or directly interfere with the actual construction of the fire station project.

Thanks for your consideration.

Sincerely,

Robert K. Miller

F. Robert K. Miller, June 11, 2018

- F-1.** Draft EIR Section 4.10.2.4 Hydrology and Water Quality, Existing Setting, describes the drainage conditions described in this comment:

“During rainfall events, storm water runoff sheet flows southeasterly and southerly until draining into the Hollister Avenue right-of-way, where it is then conveyed easterly in a gutter until entering a drainage inlet and subsequent storm drain approximately 880 feet down Hollister Avenue.”

Draft EIR Section 4.10.2.4 Hydrology and Water Quality, Impact HWQ-2: Site Drainage, describes proposed drainage conditions resulting from Project implementation:

“All proposed on-site impervious surface development would drain to storm water control measures consisting of a 2,500-square-foot bioretention basin or to a 3,000-square-foot permeable paver parking lot, both of which would be capable of receiving calculated site storm water runoff and would reduce overall quantity of runoff (Appendix I; see Table 4.10-13). The bioretention basin will utilize the sand/compost planning medium specified in the Santa Barbara County’s Technical Guide and the CCRWQCB’s Post Construction Requirements and is designed to exceed storm water storage volume capacity by over 1,000 cubic feet, as calculated for the site by the Central Coast Region Stormwater Control Measure Sizing Calculator. As further provided in the Drainage Analysis and Stormwater Control Plan, the Project’s proposed storm water control measures are designed to achieve and exceed storm water treatment requirements. Given the Project would include construction of storm water control measures in conformance with existing regulations and which would exceed storm water treatment requirements, impacts of the Project from storm water runoff are considered *adverse, but less than significant* (Class III).

Though not characterized as a *beneficial impact* (Class IV), the proposed Project drainage plan would improve stormwater runoff patterns by retaining flows onsite, instead of present conditions where runoff exits the Project site and continues eastward along Hollister Avenue.

- F-2.** Draft EIR Figure 2.5b, Site Improvement Plan (southern portion), illustrates that the southeastern portion of the Project site would be raised from 115 feet above sea level (ASL) to 119 ASL. The filling would be necessary to direct drainage away from the existing swale depression at the Project site southeastern corner, and would direct runoff to a series of infiltrating perforated pipes extending along the eastern project boundary. The drain would convey the runoff in a southwesterly direction, away from the eastern Project boundary (and the Hideaway Townhomes site) through subterranean, perforated pipes that through which the runoff would be dissipated.

- F-3** The proposed Site Improvement Plan as depicted in Draft EIR Figure 2-5b

- has been revised to reduce the elevation of finished topography by approximately 1.5 feet in the southeastern Project corner. The finished floor elevation of the storm drain along the eastern project boundary has been lowered from 119.56 feet ASL to 118.16 feet ASL. Drainage would still be effectively directed through the subsurface storm drain to the infiltrating perforated pipes extending along the eastern project boundary on the east side of the proposed Fire Station driveways. The use of fill is required to provide for positive drainage flow to the storm drain that would avoid ponding in the southeastern corner of the Project site and stormwater overflow on to The Hideaway residential site.
- F-4** As explained in Response to Comment F-3 above, the use of fill is required to avoid the drainage collecting in the swale depression in the southeastern corner of the Project site and avoid stormwater overflow on to the Hideaways Townhome site.
- F-5** As described in Response to Comment F-2 and F-3 above, stormwater flows in the southeastern corner of the Project site would be conveyed to subterranean infiltrating perforated pipes extending along the eastern project boundary on the east side of the proposed Fire Station driveways. No secondary retention basin would be necessary.
- F-6** The width of Fire Station driveways cannot be reduced without compromising the safety of fire engine operations. The driveway width has been designed to fire station industry standards. No reduction in this width is feasible.
- F-7** The proposed landscape plan has been revised (see Figure 2-11) and all proposed New Zealand Christmas trees have been eliminated. Draft EIR Section 2.6.5 Landscaping Plan has been revised (new text underlined and deleted text strike-out) as follows:

“The areas adjacent to and around the structure and exterior facilities would be landscaped with a mixture of native and drought tolerant plantings (see Figure 2-11). The planting design would provide appropriate examples of fuel management plant design materials to be used in the three different Project site planting zones. Screening vegetation along the northern and eastern property boundary, including large ~~three (3) 24- to 36-~~ to 48-inch box specimen native Monterey cypress, five (5) 48-inch box native coast live oak, six (6) 36-inch box native coast live oak, and fourteen (14) 24-inch box Arbutus marina (Marina strawberry) ~~New Zealand Christmas trees,~~ would achieve a height of between 30 to 50 feet. Thirty-five (35) native lemonade berry bushes would be planted between the specimen trees and achieve a height of 10 feet. One Monterey cypress (in the northeastern corner), one (1) 36-inch box coast live oak, four (4) Arbutus marina trees, and sixteen (16) lemonade berry bushes would be planted along the eastern project boundary. One (1) 36-inch box coast live oak, five (5) 24-inch box coast live oak, and nineteen (19) lemonade berry bushes would be”

planted along the eastern project boundary.

The linear arrangement of large screen trees and bushes would be complimented by smaller native and drought-tolerant shrubs ~~reaching 12 to 20 feet high~~. The landscaping would provide a visual separation between the fire station institutional uses and The Hideaway residential development to the east, and southerly views from US 101 and residential neighborhoods to the north. Other native and drought-tolerant shrubs would be planted in landscaping experienced from Hollister Avenue looking northward.”

- F-8** The proposed Project does not include a separate fence (wrought iron or otherwise) along the eastern boundary adjacent to The Hideaway residential site. No driveway gate is proposed, such that no issues of visual compatibility with The Hideaway wrought iron fence design would result.
- F-9** All Fire Station safety cameras would be directed to access areas immediately adjacent to the facility. They would not be directed across the Project site toward The Hideaway residential site.
- F-10** Standard best management practices would be used during construction to ensure against the migration of gophers offsite during ground disturbances.
- F-11** Draft EIR Section 2.6.1, Project Description, Construction, explains that removal of the eucalyptus trees on site is necessary to achieve compliance with The Essential Services Buildings Seismic Safety Act of 1986 (Health & Safety Code Division 12.5, Chapter 2, Article 1, Section 16001). The Draft EIR explains that the Act...

“states that essential facilities such as Fire Station 10 shall be designed and constructed to minimize fire hazards,’ and that nonstructural components vital to the operation of essential services buildings shall be able to resist, insofar as practical, the forces generated by fire and winds. The Act provides local discretion in determining how minimizing fire hazards can be accomplished. The SBCFD Fire Marshal has determined that existing eucalyptus trees on the Fire Station 10 Project site are a fire hazard given their potential flammability (Division Chief/ Fire Marshall Steve Oaks, SBCFD, personal communication 2017). A previous tree survey of the Project site (Robert Muraoka, 2016) identified numerous dead eucalyptus trees, and others where several large branches had failed and broken off. These large limbs may pose potential hazards to adjacent land uses. Trimming of large eucalyptus tree limbs along the eastern Project site boundary has occurred as the request of adjacent The Hideaway neighbors. Therefore, existing eucalyptus woodland totaling 56 eucalyptus trees, as well as other potentially flammable vegetation including coastal sage scrub and non-native grassland, would be removed from the Project site to ensure fire hazards are minimized pursuant to the Essential Services Act.”

Therefore, removal of the existing eucalyptus trees onsite is required to meet the basic project objectives of the proposed fire station.



Environmental Hearing Officer ENVIRONMENTAL HEARING MINUTES

Thursday, June 14, 2018; 5:30 P.M.

Goleta City Hall, Council Chambers
130 Cremona Drive, Suite B, Goleta, California

Environmental Hearing Officer
Lisa Prasse, Current Planning Manager

A. CALL MEETING TO ORDER

The meeting was called to order at 5:35 p.m. by Lisa Prasse, Environmental Hearing Officer.

Staff present: Lisa Prasse, Current Planning Manager; Laura Bridley, Contract Planner; David Stone, Consultant, Wood Group Environment & Infrastructure, Inc. (formerly Amec Foster Wheeler Environment & Infrastructure, Inc.); and Linda Gregory, Recording Clerk.

B. PUBLIC HEARING

B-1. DRAFT ENVIRONMENTAL REPORT FOR THE FIRE STATION 10 PROJECT; CASE NOS. (17-069-DRB; 17-044-GPA/RZ/DP); 7952 HOLLISTER AVENUE; APN 079-210-075

The purpose of the meeting is to receive comments on the Draft Environmental Impact Report (Draft EIR) for Fire Station 10. No formal action will be taken.

The staff presentation was made by Laura Bridley, Contract Planner, and David Stone, Consultant, Wood Group Environment & Infrastructure, Inc.

The public hearing was opened for public comment by Lisa Prasse, Environmental Hearing Officer, at 5:50 p.m.

Public Speakers:

Bill Shelor disclosed that he is a member of the Goleta Design Review Board but his comments are his own at this hearing. Mr. Shelor commented:

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- 1) Impact PS-1 will save lives and property.
- 2) He regrets that project Impact AES-1, the removal of mature eucalyptus trees, would occur because it is a beautiful corridor that will be changed forever.
- 3) Regarding BIO-3, he believes there is a current active raptor nest in the eucalyptus trees and requested that someone verify its presence and that the current active raptor nest be included as part of public record, and that it be analyzed relative to General Plan policies.

Jim Cutting, Hideaway homeowner, noted that several residents of the Hideaway community submitted a letter dated June 11, 2018, expressing concerns that he will cover. Mr. Cutting commented:

- 1) Questioned whether it would be less expensive to utilize one of the other alternative sites if money would not need to be spent to improve the current site for grading and to add the wall along the railroad tracks.
- 2) Stormwater drainage is a concern, particularly with the Hideaway residential units adjacent to the project site and on the corner. Most of the land is heavy clay and it does not absorb runoff well.
- 3) Expressed concern regarding raising the grade of the project site behind the Hideaway residential property resulting in a steep slope. Concerns include how future project site drainage would affect the Hideaway properties, who will maintain the new slope on the project site, and how will current southerly views from the Hideaway residences be affected. Questioned whether the proposed project site fill on the eastern property could be reduced to lower the slope gradient from the project site eastward.
- 4) Questioned whether the size of the proposed Fire Station driveway could be reduced from 22 feet to 20 feet to reduce the slope of the green zone.
- 5) Hideaway neighbors are concerned that the canopy of the five proposed New Zealand Christmas trees on the eastern Fire Station boundary would intrude over their back yards, blocking out the sun, and also result in leaf litter. A smaller medium-size landscaping tree would be more appropriate.
- 6) Questioned whether there will be a new separate fence erected adjacent to the Hideaway wall on the eastern project site boundary. Also, will the proposed driveway gate match the Hideaway's wrought iron fence design so views could be maintained.
- 7) The parking lot lighting should be directed downward and not shine directly into the homes.

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- 8) Requested that security cameras be directed downward and not look into their homes.
- 9) Requested that efforts be made to keep gophers which are currently present in the soil from not migrating eastward into the Hideaway property. Suggested, if possible, utilizing the service of a pest control company for removal of gophers before the construction starts.
- 10) Noted that one Hideaway resident expressed in the letter the support for saving as many trees as possible because it is presently a pretty canopy when driving along Hollister Avenue.

Barbara Massey commented:

- 1) The fire station is needed; however she believes the DEIR is inadequate.
- 2) The coverage of ESHAs is inadequate.
- 3) There is little concern with regard to nesting and roosting of raptors. It is not clear if the raptors have been surveyed since 2016.
- 4) Regarding Impact AES-3.1, she believes that changing the area is a degradation of the scenic area. Also, she believes the scenic value of an open area with large trees is not a low value.
- 5) Regarding Impact AES-3.2, the mean peak heights of the project should be noted in the documents to protect the public views and so there is no confusion about the heights that were approved.
- 6) Regarding Mitigation Measure AES-3.2.3, the monitoring by City staff, as approved by the DRB, should be done prior to the final inspection and release of the occupancy permit.
- 7) Regarding Impact AES-4, she believes that the future lighting will disturb wildlife and humans, and contribute to the increasing night sky pollution. The lighting is in an area that previously has no lights.
- 8) The proposed flagpole should not have upward directed night lighting. The flagpole does not need to have lighting.

Lisa Prasse, Environmental Hearing Officer, reported that a letter was received from the Santa Barbara Audubon Society dated June 13, 2018, which will be entered into the record.

Steve Jolley agreed with all comments made by speaker Jim Cutting. Mr. Jolley commented:

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- 1) Expressed concern that the ground level of the road that parallels the Hideaway backyards is currently two feet higher than the backyards and that the road would have a huge impact for the residents if the elevation was 5 or more feet higher.
- 2) Requested that different tree species be considered that would not overshadow the backyards of Hideaway residents.
- 3) Noted that there are raptors and that his grandchildren are currently observing the raptors with babies.

Kevin Barthel commented:

- 1) He believes the DEIR is written in favor of the proposed Fire Station 10.
- 2) Expressed concern regarding cutting down the eucalyptus trees, stating that eucalyptus trees define Ellwood.
- 3) Most of the eucalyptus trees are the trees that are most healthy in Ellwood. The eucalyptus trees have been at Ellwood longer than ten years.
- 4) Questioned whether there is an Arborist report. The report should indicate the number of healthy trees. Suggested PTAC input.
- 5) He believes this is not the best site for the fire station, and suggested finding a site located within the County jurisdiction. Most of the overlay is located in the ocean and the County, with a smaller portion in Goleta.
- 6) With regard to noise, he noted when a fire truck goes up Hollister Avenue, the noise echoes through the neighborhood. Suggested requirements that the freeway should be used for fire trucks to access Storke Road or beyond.
- 7) Questioned why the proposed road is located next to the Hideaway properties with no buffers.
- 8) Suggested that downsizing the fire department could save the healthy trees.
- 9) Requested that scenic views not be destroyed with this project, noting this is the gateway to Goleta.
- 10) Consider story poles.

Lisa Prasse, Environmental Hearing Officer, closed the public hearing at 6:09 p.m. Ms. Prasse announced that the public review period closes on July 2, 2018, at 5:00 p.m.

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C. ADJOURNMENT

Adjournment at 6:10 p.m.

H. Environmental Hearing Officer Environmental Hearing Minutes, June 14, 2018

Bill Shelor

- G-1.** The support for the classification of Impact PS-1 as *beneficial* (Class IV) is appreciated.
- G-2** Draft EIR Section 2.6.1, Project Description, Construction, explains that removal of the eucalyptus trees on site is necessary to achieve compliance with The Essential Services Buildings Seismic Safety Act of 1986 (Health & Safety Code Division 12.5, Chapter 2, Article 1, Section 16001). The Draft EIR explains that the Act...

“states that essential facilities such as Fire Station 10 shall be designed and constructed to minimize fire hazards,’ and that nonstructural components vital to the operation of essential services buildings shall be able to resist, insofar as practical, the forces generated by fire and winds. The Act provides local discretion in determining how minimizing fire hazards can be accomplished. The SBCFD Fire Marshal has determined that existing eucalyptus trees on the Fire Station 10 Project site are a fire hazard given their potential flammability (Division Chief/ Fire Marshall Steve Oaks, SBCFD, personal communication 2017). A previous tree survey of the Project site (Robert Muraoka, 2016) identified numerous dead eucalyptus trees, and others where several large branches had failed and broken off. These large limbs may pose potential hazards to adjacent land uses. Trimming of large eucalyptus tree limbs along the eastern Project site boundary has occurred as the request of adjacent The Hideaway neighbors. Therefore, existing eucalyptus woodland totaling 56 eucalyptus trees, as well as other potentially flammable vegetation including coastal sage scrub and non-native grassland, would be removed from the Project site to ensure fire hazards are minimized pursuant to the Essential Services Act.”

Therefore, removal of the existing eucalyptus trees onsite is required to meet the basic project objectives of the proposed fire station.

The proposed landscape plan (please see Figure 2-11) has been revised to provide for three (3) Monterey cypress, eleven (11) coast live oak, and fourteen *Arbutus marina* (Marina strawberry) trees that would be planted along the eastern and northern perimeter of the fire station reaching between 30 and 50 feet in height.

Draft EIR Section 2.6.5 Landscaping Plan has been revised (new text underlined and deleted text strike-out) as follows:

“The areas adjacent to and around the structure and exterior facilities would be landscaped with a mixture of native and drought tolerant plantings (see Figure 2-11). The planting design would provide appropriate examples of fuel management plant design materials to be

used in the three different Project site planting zones. Screening vegetation along the northern and eastern property boundary, including large three (3) 24- to 36- to 48-inch box specimen native Monterey cypress, five (5) 48-inch box native coast live oak, six (6) 36-inch box native coast live oak, and fourteen (14) 24-inch box *Arbutus marina* (Marina strawberry) New Zealand Christmas trees, would achieve a height of between 30 to 50 feet. Thirty-five (35) native lemonade berry bushes would be planted between the specimen trees and achieve a height of 10 feet. One Monterey cypress (in the northeastern corner), one (1) 36-inch box coast live oak, four (4) *Arbutus marina* trees, and sixteen (16) lemonade berry bushes would be planted along the eastern project boundary. One (1) 36-inch box coast live oak, five (5) 24-inch box coast live oak, and nineteen (19) lemonade berry bushes would be planted along the eastern project boundary.

The linear arrangement of large screen trees and bushes would be complimented by smaller native and drought-tolerant shrubs reaching 12 to 20 feet high. The landscaping would provide a visual separation between the fire station institutional uses and The Hideaway residential development to the east, and southerly views from US 101 and residential neighborhoods to the north. Other native and drought-tolerant shrubs would be planted in landscaping experienced from Hollister Avenue looking northward.

These trees would offset the removal of the eucalyptus woodland stand.

G-3 Draft EIR Section 4.2, Impact BIO-3, states,

“The potential exists for disturbance of active raptor nests and other bird nests in trees and shrubs within and adjacent to the Project site should construction occur during the bird breeding season (February 1- August 15). In addition, the GP/CLUP Conservation Element Policy 8.4 requires protection of active and historical raptor nest sites when feasible. In addition to the removal of eucalyptus and ornamental landscape trees, construction of the Project would require removal of all shrub and grassland vegetation onsite. Several different species of birds would potentially nest in the vegetation onsite and adjacent to the Project site. If nests were to exist when construction were undertaken, this action would result in a short-term *potentially significant impact* (Class II) on biological resources.”

As seen above, the Draft EIR does identify removal of the eucalyptus trees during the raptor nesting season as a potentially significant impact on biological resources.

The Draft EIR has been revised to acknowledge that a raptor nest has been observed onsite. The Draft EIR identifies that nesting raptors were observed in 2010, though not during 2016 birding surveys. It is reasonable to conclude that raptors periodically use the eucalyptus trees for nesting. Given this potential, Draft EIR Mitigation Measure BIO-3 requires that:

“Vegetation removal including clearing and grubbing and tree trimming shall avoid the bird nesting season (February 1st – August 31st) as feasible to ensure protection of breeding birds potentially on site and directly east and north of the Project site during the site preparation and construction. If avoidance of the bird nesting season is infeasible, pre-construction breeding bird surveys shall be performed by a qualified, City-approved biologist. Nesting bird pre-construction surveys shall occur within the area to be disturbed and extend outward 500 ft. or to the property boundary.”

“If any occupied bird nests or cavity roosts are found, the biologist shall determine an appropriate buffer zone that considers the bird species, nest location, nest height, existing pre-construction level of disturbance in the vicinity of the nest, and proposed construction activities. A buffer ranging in size from 100 ft. for nesting passerine species to 500 ft. for nesting raptors shall be determined and demarcated by the biologist.”

These survey procedures are based on standard protocols promulgated by the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (USFWS 2014). The Winter and Nesting Raptor Survey Protocols attached to the Draft EIR Comment Letter B (California Coastal Commission), however, have been incorporated as refinements to Draft EIR Mitigation Measure BIO-3 to comply with the CCC standard protocols. Revisions to Draft EIR Mitigation Measure BIO-3 are identified in underlined text below:

“A winter raptor survey shall be conducted between December 1 and February 15 performed by a qualified, City-approved biologist with formal training in avian biology, significant field experience in raptor survey techniques, and demonstrated ability to identify accurately local species under a variety of field conditions. The survey shall consist of at least five visits, spaced at least one week apart. Each visit shall consist of at least two hours on site during the period between dawn and 10:00 am. The biologist shall specifically search for foraging birds and birds using trees for perching, roosting, or nesting. The survey report shall provide a list of species that could reasonably be expected to use habitats on the site under other probable winter weather or prey conditions, and a list of wintering species that are known to have used the site in the past.”

Vegetation removal including clearing and grubbing and tree trimming shall avoid the bird nesting season (February 1st – August 31st) as feasible to ensure protection of breeding birds potentially on site and directly east and north of the Project site during the site preparation and construction. If avoidance of the bird nesting season is infeasible, pre-construction breeding bird surveys shall be performed by a qualified, City-approved biologist with formal training in avian biology, significant field experience in raptor survey techniques, and demonstrated ability to identify accurately local species under a variety of field conditions.

Nesting bird pre-construction surveys shall occur within the area to be disturbed and extend outward 500 ft. or to the property boundary. The survey shall be conducted between March 1 and June 15. The survey shall consist of at least five visits, spaced at least one week apart. Each visit shall consist of at least two hours on site during the period between dawn and 10:00 am. The biologist shall specifically search for nests and for foraging birds and birds using trees for perching, roosting, or nesting. The survey report shall provide a list of species that could reasonably be expected to use habitats on the site under other probable weather or prey conditions, and a list of species that are known to have used the site in the past.

Plan Requirements and Timing: The applicant shall submit a winter raptor survey and a nesting raptor survey plan, including the name and qualifications of the biologist that will conduct such survey, to the California Coastal Commission (CCC) Executive Director and the City for staff review and approval. The results of the survey shall be submitted to the CCC Executive Director and City for staff review and approval prior to the issuance of any grading or building permits.

The residual impact of this feasible mitigation is refined in the Final EIR, as stated below:

Implementation of Mitigation Measure BIO-3 would reduce the potential to disturb sensitive bird nesting during construction. The residual impact on biological resources would be *adverse, but feasibly mitigated to less than significant* (Class II). Future raptor nesting would feasibly continue within eucalyptus woodland and raptor nesting habitat in the vicinity of the Project site including the Sandpiper Golf Course to the south, along the north side of Hollister Avenue and south of U.S. 101 adjacent to Haskells Beach Park and the Bacara Resort and Spa to the west, the Ellwood Mesa Preserve to the southeast, and between the Union Pacific Railroad tracks and US 101 extending to Ellwood School east of the Project site.

The Draft EIR Section 4.2.1, Project Site Setting, Sensitive Wildlife Species, has been revised to provide additional clarity regarding the nature of the eucalyptus woodland onsite, and its relation to ESHA designation criteria.”

Nesting raptors which are protected by the Migratory Bird Treaty Act (MBTA), California Department of Fish and Game Code (DFG Code), as well as the GP/CLUP. Though no nests were identified in the City of Goleta GP/CLUP (City of Goleta 2006) and no raptor nests were identified within the Project site in 2016 (WEI 2016), red-tailed and red-shouldered hawks raptors are known to have historically constructed nests within the stands of eucalyptus trees on the Project site. A raptor nest has been observed onsite during the summer of 2018 (Bill Shelor 2018, Steve Jolley 2018; see Section 7.0, Comment F-3 and F-24).

There is the potential to for future nesting in these trees, as well as ornamental trees located within the Project site, in the future.

As noted above, periodic raptor nesting has occurred within the 0.61-acre of eucalyptus woodland onsite. Though no nests were identified during the preparation of the City's GP/CLUP EIR and the on-site biological assessment in 2016, a raptor nest has been observed onsite during the summer of 2018 (Bill Shelor 2018, Steve Jolley 2018; see Section 7.0, Comment F-3 and F-24). This indicates that the 0.61 acres of eucalyptus woodland are periodically used by raptors that are considered California Species of Special Concern.

City of Goleta GP/CLUP Policy CE 1: Environmentally Sensitive Habitat Area Designations and Policy states:

CE 1.1 Definition of Environmentally Sensitive Habitat Areas. [GP/CP] ESHAs shall include, but are not limited to, any areas that through professional biological evaluation are determined to meet the following criteria:

b. Any area that includes habitat for species and plant communities recognized as threatened or endangered by the state or federal governments; plant communities recognized by the State of California (in the Terrestrial Natural Communities Inventory) as restricted in distribution and very threatened; and those habitat types of limited distribution recognized to be of particular habitat value, including wetlands, riparian vegetation, eucalyptus groves associated with monarch butterfly roosts, oak woodlands, and savannas.

The 0.61 acres of eucalyptus woodland onsite is not considered an ESH pursuant to the above criteria for the following reasons:

1. It has been substantially degraded and fragmented from the prior gas station use and subsequent remediation activities.
2. Though it has periodically attracted individual raptor nesting, this activity has not consistently occurred throughout time, and the intensity of the nesting has been limited.
3. Eucalyptus woodland and raptor nesting habitat in the vicinity of the Project site is not restricted in its distribution. Substantial contiguous raptor nesting habitat exists within the Sandpiper Golf Course to the south, along the north side of Hollister Avenue and south of U.S. 101 adjacent to Haskells Beach Park and the Bacara Resort and Spa to the west, the Ellwood Mesa Preserve to the southeast, and between the Union Pacific Railroad tracks and US 101 extending to Ellwood School east of the Project site.

Given that the eucalyptus woodland on the Project site is not considered ESHA, removal of the vegetation would not be subject to GP/CP Conservation Element Policy CE 1.6 Protection of ESHAs, Policy CE 1.7 Mitigation of Impacts to ESHAs, and Policy CE 1.9 Standards Applicable to Development Projects.

Jim Cutting

G-4 Draft EIR Section 2.3 Project Objectives, states,

“The need for Fire Station 10 in western Goleta was identified as early as 1967 during a regional assessment of long-term growth in the Goleta Valley by the National Board of Fire Underwriters for fire protection services. The SBCFD subsequently determined the need for an additional fire station in the western Goleta Valley due to high response times and population growth in the 1980’s. This need was highlighted in the County of Santa Barbara’s Goleta Community Plan (adopted in August 1993), which identified a conceptual fire station site at or in proximity to the Project site. The City’s General Plan/Coastal Land Use Plan Public Facilities Element approved in 2006 identified the proposed Project site as the appropriate location for the fire protection service expansion.”

Draft EIR Figure 2-2 City of Goleta Fire Station 5-Minute Response Zones illustrates the location of proposed Fire Station 10 relative to other existing stations in the vicinity. This strategic location would enhance the fire protection response in a geographically underserved area.

The costs of developing the proposed Fire Station are not subject to environmental review under CEQA Guidelines. CEQA Guidelines Section 15131(a) states:

“Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.”

Therefore, no analysis of economic considerations associated with development of Fire Station 10 are addressed in this EIR.

G-5 Draft EIR Figure 2.5b, Site Improvement Plan (southern portion), illustrates that the southeastern portion of the Project site would be raised from 115 feet above sea level (ASL) to 119 ASL. The filling would be necessary to direct drainage away from the existing swale depression at the Project site southeastern corner, and would direct runoff to a series of infiltrating perforated pipes extending along the eastern project boundary. The drain

would convey the runoff in a southwesterly direction, away from the eastern Project boundary (and the Hideaway Townhomes site) to an onsite subterranean retention basin.

- G-6** The proposed Site Improvement Plan depicted in Draft EIR Figure 2.5b has been revised to reduce the elevation of finished topography by approximately 1.5 feet in the southeastern Project corner. The finished floor elevation of the storm drain along the eastern project boundary has been lowered from 119.56 feet ASL to 118.16 feet ASL. Drainage would still be effectively directed through the subsurface storm drain to the infiltrating perforated pipes extending along the eastern project boundary on the east side of the proposed Fire Station driveways. The use of fill is required to provide for positive drainage flow to the storm drain that would avoid ponding in the southeastern corner of the Project site and stormwater overflow on to The Hideaway residential site.
- G-7** The width of Fire Station driveways cannot be reduced without compromising the safety of fire engine operations. The driveway width has been designed to fire station industry standards. No reduction in this width is feasible.
- G-8** The proposed landscape plan has been revised (see Figure 2-11) to substantially increase the number of native screen trees and tall shrubs that would be planted on the eastern and northern project boundaries. Draft EIR Section 2.6.5 Landscaping Plan has been revised (new text underlined and deleted text strike-out) as follows:

“The areas adjacent to and around the structure and exterior facilities would be landscaped with a mixture of native and drought tolerant plantings (see Figure 2-11). The planting design would provide appropriate examples of fuel management plant design materials to be used in the three different Project site planting zones. Screening vegetation along the northern and eastern property boundary, including large ~~three (3) 24- to 36-~~ to 48-inch box specimen native Monterey cypress, five (5) 48-inch box native coast live oak, six (6) 36-inch box native coast live oak, and fourteen (14) 24-inch box *Arbutus marina* (Marina strawberry) New Zealand Christmas trees, would achieve a height of between 30 to 50 feet. Thirty-five (35) native lemonade berry bushes would be planted between the specimen trees and achieve a height of 10 feet. One Monterey cypress, one (1) 36-inch box coast live oak, four (4) *Arbutus marina* trees, and sixteen (16) lemonade berry bushes would be planted along the eastern project boundary. One (1) 36-inch box coast live oak, five (5) 24-inch box coast live oak, and nineteen (19) lemonade berry bushes would be planted along the eastern project boundary.”

The linear arrangement of large screen trees and bushes would be complimented by smaller native and drought-tolerant shrubs ~~reaching 12 to 20 feet high~~. The landscaping would provide a visual separation

between the fire station institutional uses and The Hideaway residential development to the east, and southerly views from US 101 and residential neighborhoods to the north. Other native and drought-tolerant shrubs would be planted in landscaping experienced from Hollister Avenue looking northward.”

The revised landscape plan includes over 70 percent Santa Barbara native landscape trees and tall shrubs (replacing the 56 non-native eucalyptus trees to be removed). Native Santa Barbara understory and ground cover plantings include locally native yarrow shrubs, California meadow sage (*Carex pansa*), and California grey rush grasses (*Juncus patens*, *Leymus condensatus*).

G-9 The proposed Project does not include a separate fence (wrought iron or otherwise) along the eastern boundary adjacent to The Hideaway residential site. No driveway gate is proposed, such that no issues of visual compatibility with The Hideaway wrought iron fence design would result.

G-10. Draft EIR Section 2.6.7 Lighting states:

“Lighting at the Fire Station 10 entrance would be limited to the immediate vicinity sufficient to create a visually welcoming gateway. The public parking lot and public entry would be lit for safety, but would use shielded overhead lighting. The Apparatus Bay apron would require down-lighting at the front and rear overhang or would be down lit from the walls. Low level path lighting or bollards on motion sensors would illuminate walkways to employee parking and accessory site buildings. Accessory buildings and areas (such as the fuel station, hose drying rack, and truck turn-around) would require overhead lighting only when operations require and would be turned off when not in use. All other lighting would be shielded to avoid all glare extending offsite.”

Draft EIR Mitigation Measure AES-4.1 states,

“**AES-4.1: Lighting Specifications.** Any exterior lighting installed on the Project site shall be of low intensity, low glare design, and shall be hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent parcels. Exterior lighting fixtures shall be kept to the minimum number and intensity needed to ensure public safety. These lights shall be dimmed after 11 p.m. to the maximum extent practical without compromising public safety. Upward directed exterior lighting is prohibited except to light the flag pole. Lighting fixtures shall be appropriate for the architectural style of the structure and surrounding area.

Plan Requirements and Timing: The locations of all exterior lighting fixtures, complete cut-sheets of all exterior lighting fixtures, and a photometric plan prepared by a registered professional engineer showing the extent of all light and glare emitted by all exterior lighting fixtures shall be reviewed and approved by the DRB, and the Planning

and Environmental Review Director, or designee, before the City issues a building permit for construction.

Monitoring: Before the City issues a certificate of occupancy, City staff, shall inspect exterior lighting features to ensure that they have been installed consistent with approved plans.

The above measure would substantially minimize the visual impacts associated with introduction of new sources of light and glare for construction of the Fire Station 10. The residual impact of creation of new sources of light and glare would be *adverse, but feasibly mitigated to less than significant* (Class II)."

Implementation of Draft EIR Mitigation Measure AES-4.1 would ensure that parking lot lighting would be directed downward such that glare would not be diffused offsite, including to The Townhomes residential site.

- G-11** All Fire Station safety cameras would be directed to access areas immediately adjacent to the facility. They would not be directed across the Project site toward The Hideaway residential site.
- G-12** Standard best management practices would be used during construction to ensure against the migration of gophers offsite during ground disturbances.
- G-13** Draft EIR Section 2.6.1, Project Description, Construction, explains that removal of the eucalyptus trees on site is necessary to achieve compliance with The Essential Services Buildings Seismic Safety Act of 1986 (Health & Safety Code Division 12.5, Chapter 2, Article 1, Section 16001). The Draft EIR explains that the Act...

"states that essential facilities such as Fire Station 10 shall be designed and constructed to minimize fire hazards,' and that nonstructural components vital to the operation of essential services buildings shall be able to resist, insofar as practical, the forces generated by fire and winds. The Act provides local discretion in determining how minimizing fire hazards can be accomplished. The SBCFD Fire Marshal has determined that existing eucalyptus trees on the Fire Station 10 Project site are a fire hazard given their potential flammability (Division Chief/ Fire Marshall Steve Oaks, SBCFD, personal communication 2017). A previous tree survey of the Project site (Robert Muraoka, 2016) identified numerous dead eucalyptus trees, and others where several large branches had failed and broken off. These large limbs may pose potential hazards to adjacent land uses. Trimming of large eucalyptus tree limbs along the eastern Project site boundary has occurred as the request of adjacent The Hideaway neighbors. Therefore, existing eucalyptus woodland totaling 56 eucalyptus trees, as well as other potentially flammable vegetation including coastal sage scrub and non-native grassland, would be removed from the Project site to ensure fire hazards are minimized pursuant to the Essential Services Act."

Therefore, removal of the existing eucalyptus trees onsite is required to

meet the basic project objectives of the proposed fire station.

The proposed landscape plan (please see Figure 2-11) has been revised to provide for three (3) Monterey cypress, eleven (11) coast live oak, and fourteen *Arbutus marina* (Marina strawberry) trees that would be planted along the eastern and northern perimeter of the fire station reaching between 30 and 50 feet in height.

Draft EIR Section 2.6.5 Landscaping Plan has been revised (new text underlined and deleted text strike-out) as follows:

“The areas adjacent to and around the structure and exterior facilities would be landscaped with a mixture of native and drought tolerant plantings (see Figure 2-11). The planting design would provide appropriate examples of fuel management plant design materials to be used in the three different Project site planting zones. Screening vegetation along the northern and eastern property boundary, including large ~~three (3) 24- to 36-~~ to 48-inch box specimen native Monterey cypress, five (5) 48-inch box native coast live oak, six (6) 36-inch box native coast live oak, and fourteen (14) 24-inch box *Arbutus marina* (Marina strawberry) New Zealand Christmas trees, would achieve a height of between 30 to 50 feet. Thirty-five (35) native lemonade berry bushes would be planted between the specimen trees and achieve a height of 10 feet. One Monterey cypress (in the northeastern corner), one (1) 36-inch box coast live oak, four (4) *Arbutus marina* trees, and sixteen (16) lemonade berry bushes would be planted along the eastern project boundary. One (1) 36-inch box coast live oak, five (5) 24-inch box coast live oak, and nineteen (19) lemonade berry bushes would be planted along the eastern project boundary.

The linear arrangement of large screen trees and bushes would be complimented by smaller native and drought-tolerant shrubs reaching 12 to 20 feet high. The landscaping would provide a visual separation between the fire station institutional uses and The Hideaway residential development to the east, and southerly views from US 101 and residential neighborhoods to the north. Other native and drought-tolerant shrubs would be planted in landscaping experienced from Hollister Avenue looking northward.”

These trees would offset the removal of the eucalyptus woodland stand.

Barbara Massey

G-14 Please see response to comments G-15 through G-21.

G-15 Please see response to Comment B-1 explaining why eucalyptus woodland on site is not considered ESHA. Please see response to Comment E-1 explaining why coastal sage habitat on site is not considered ESHA.

- G-16** The Draft EIR Section 4.2.1, Project Site Setting, Sensitive Wildlife Species, has been revised to provide additional clarity regarding the nature of the eucalyptus woodland onsite, and its relation to ESHA designation criteria.

“Nesting raptors which are protected by the Migratory Bird Treaty Act (MBTA), California Department of Fish and Game Code (DFG Code), as well as the GP/CLUP. Though no nests were identified in the City of Goleta GP/CLUP (City of Goleta 2006) and no raptor nests were identified within the Project site in 2016 (WEI 2016), red-tailed and red-shouldered hawks raptors are known to have historically constructed nests within the stands of eucalyptus trees on the Project site. A raptor nest has been observed onsite during the summer of 2018 (Bill Shelor, Steve Jolley 2018; see Section 7.0, Comment F-3 and F-24). There is the potential to for future nesting in these trees, as well as ornamental trees located within the Project site, in the future.

As noted above, periodic raptor nesting has occurred within the 0.61-acre of eucalyptus woodland onsite. Though no nests were identified during the preparation of the City’s GP/CLUP EIR and the on-site biological assessment in 2016, a raptor nest has been observed onsite during the summer of 2018 (Bill Shelor, Steve Jolley 2018; see Section 7.0, Comment F-3 and F-24). This indicates that the 0.61 acres of eucalyptus woodland are periodically used by raptors that are considered California Species of Special Concern.

City of Goleta GP/CLUP Policy CE 1: Environmentally Sensitive Habitat Area Designations and Policy states:

CE 1.1 Definition of Environmentally Sensitive Habitat Areas. [GP/CP] ESHAs shall include, but are not limited to, any areas that through professional biological evaluation are determined to meet the following criteria:

b. Any area that includes habitat for species and plant communities recognized as threatened or endangered by the state or federal governments; plant communities recognized by the State of California (in the Terrestrial Natural Communities Inventory) as restricted in distribution and very threatened; and those habitat types of limited distribution recognized to be of particular habitat value, including wetlands, riparian vegetation, eucalyptus groves associated with monarch butterfly roosts, oak woodlands, and savannas.

The 0.61 acres of eucalyptus woodland onsite is not considered an ESH pursuant to the above criteria for the following reasons:

1. It has been substantially degraded and fragmented from the prior gas station use and subsequent remediation activities.

2. Though it has periodically attracted individual raptor nesting, this activity has not consistently occurred throughout time, and the intensity of the nesting has been limited.
3. Eucalyptus woodland and raptor nesting habitat in the vicinity of the Project site is not restricted in its distribution. Substantial contiguous raptor nesting habitat exists within the Sandpiper Golf Course to the south, along the north side of Hollister Avenue and south of U.S. 101 adjacent to Haskells Beach Park and the Bacara Resort and Spa to the west, and the Ellwood Mesa Preserve to the southeast.

Draft EIR Section 4.2, Impact BIO-3, states,

“The potential exists for disturbance of active raptor nests and other bird nests in trees and shrubs within and adjacent to the Project site should construction occur during the bird breeding season (February 1- August 15). In addition, the GP/CLUP Conservation Element Policy 8.4 requires protection of active and historical raptor nest sites when feasible. In addition to the removal of eucalyptus and ornamental landscape trees, construction of the Project would require removal of all shrub and grassland vegetation onsite. Several different species of birds would potentially nest in the vegetation onsite and adjacent to the Project site. If nests were to exist when construction were undertaken, this action would result in a short-term *potentially significant impact* (Class II) on biological resources.”

As seen above, the Draft EIR does identify removal of the eucalyptus trees during the raptor nesting season as a potentially significant impact on biological resources.

According to Draft EIR testimony (see Bill Shelor, Steve Jolley 2018; see Section 7.0, Comment F-3 and F-24), a raptor nest has been observed onsite. The Draft EIR identifies that nesting raptors were observed in 2010, though not during 2016 birding surveys. It is reasonable to conclude that raptors periodically use the eucalyptus trees for nesting. Given this potential, Draft EIR Mitigation Measure BIO-3 requires that:

“Vegetation removal including clearing and grubbing and tree trimming shall avoid the bird nesting season (February 1st – August 31st) as feasible to ensure protection of breeding birds potentially on site and directly east and north of the Project site during the site preparation and construction. If avoidance of the bird nesting season is infeasible, pre-construction breeding bird surveys shall be performed by a qualified, City-approved biologist. Nesting bird pre-construction surveys shall occur within the area to be disturbed and extend outward 500 ft. or to the property boundary.”

“If any occupied bird nests or cavity roosts are found, the biologist shall determine an appropriate buffer zone that considers the bird species, nest location, nest height, existing pre-construction level of disturbance in the vicinity of the nest, and proposed construction activities. A buffer ranging in size from 100 ft. for nesting passerine species to 500 ft. for nesting raptors shall be determined and demarcated by the biologist.”

These survey procedures are based on standard protocols promulgated by the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (USFWS 2014). The Winter and Nesting Raptor Survey Protocols attached to the CCC comment letter, however, have been incorporated as refinements to Draft EIR Mitigation Measure BIO-3 to comply with the CCC standard protocols. Revisions to Draft EIR Mitigation Measure BIO-3 are identified in underlined text below:

“A winter raptor survey shall be conducted between December 1 and February 15 performed by a qualified, City-approved biologist with formal training in avian biology, significant field experience in raptor survey techniques, and demonstrated ability to identify accurately local species under a variety of field conditions. The survey shall consist of at least five visits, spaced at least one week apart. Each visit shall consist of at least two hours on site during the period between dawn and 10:00 am. The biologist shall specifically search for foraging birds and birds using trees for perching, roosting, or nesting. The survey report shall provide a list of species that could reasonably be expected to use habitats on the site under other probable winter weather or prey conditions, and a list of wintering species that are known to have used the site in the past.”

Vegetation removal including clearing and grubbing and tree trimming shall avoid the bird nesting season (February 1st – August 31st) as feasible to ensure protection of breeding birds potentially on site and directly east and north of the Project site during the site preparation and construction. If avoidance of the bird nesting season is infeasible, pre-construction breeding bird surveys shall be performed by a qualified, City-approved biologist with formal training in avian biology, significant field experience in raptor survey techniques, and demonstrated ability to identify accurately local species under a variety of field conditions. Nesting bird pre-construction surveys shall occur within the area to be disturbed and extend outward 500 ft. or to the property boundary. The survey shall be conducted between March 1 and June 15. The survey shall consist of at least five visits, spaced at least one week apart. Each visit shall consist of at least two hours on site during the period between dawn and 10:00 am. The biologist shall specifically search for nests and for foraging birds and birds using trees for perching, roosting, or nesting. The survey report shall provide a list of species that could reasonably be expected to use habitats on the site under other probable weather or

prey conditions, and a list of species that are known to have used the site in the past.

Plan Requirements and Timing: The applicant shall submit a winter raptor survey and a nesting raptor survey plan, including the name and qualifications of the biologist that will conduct such survey, to the California Coastal Commission (CCC) Executive Director and the City for staff review and approval. The results of the survey shall be submitted to the CCC Executive Director and City for staff review and approval prior to the issuance of any grading or building permits.

The residual impact of this feasible mitigation is refined in the Final EIR, as stated below:

Implementation of Mitigation Measure BIO-3 would reduce the potential to disturb sensitive bird nesting during construction. The residual impact on biological resources would be *adverse, but feasibly mitigated to less than significant* (Class II). Future raptor nesting would feasibly continue within eucalyptus woodland and raptor nesting habitat in the vicinity of the Project site including the Sandpiper Golf Course to the south, along the north side of Hollister Avenue and south of U.S. 101 adjacent to Haskells Beach Park and the Bacara Resort and Spa to the west, the Ellwood Mesa Preserve to the southeast, and between the Union Pacific Railroad tracks and US 101 extending to Ellwood School east of the Project site.

- G-17** Draft EIR Section 4.1.1 Visual Resources Existing Setting explains that views along Hollister Avenue are considered scenic. But the eucalyptus trees onsite are not contributing elements to the scenic quality of this view. The Draft EIR has been revised to state (revised text is underlined):

“Views from Hollister Avenue. The full length of Hollister Avenue is designated as scenic in the City’s GP/CLUP EIR (City of Goleta 2006) because of the views it offers of the Santa Ynez Mountains and agricultural foothills to the north, as well as the Pacific Ocean and Channel Islands to the south. The eucalyptus woodland within the Project site is not identified as a contributing element to this scenic character.

Impact AES-3.1 states,

“A previous tree survey identified numerous dead eucalyptus trees, and others where several large branches may pose potential hazards; these trees do not qualify as scenic resources.”

The Draft EIR Impact AES-3.1 analysis has been augmented as follows:

City of Goleta Visual Aesthetic Impact Guidelines state (page 182):
“Assessing the visual impacts of a project involves two major steps. First, the visual resources of the project site must be evaluated. Important factors in this evaluation include the physical attributes of the site, its relative visibility, and its relative uniqueness. In terms of visibility,

four types of areas are especially important: coastal and mountainous areas, the urban fringe, and travel corridors.” The existing eucalyptus trees on site are located within the urban fringe and along a travel corridor. However, their integrity and condition are compromised due to their declining health. They are also not unique, given the much more substantial concentration of woodland farther to the west, north of Haskells Beach and the Bacara Resort and Spa, the Ellwood Mesa Preserve to the southeast, and between the Union Pacific Railroad tracks and US 101 extending to Ellwood School east of the Project site. Therefore, the limited stand of eucalyptus woodland onsite is not considered a scenic visual resource.

G-18 Draft EIR Mitigation Measure AES-3.2-1 Height Limitations states,

Height Limitations. The height of structural development shown on the Design Review Board (“DRB”) approved plans considered through Advisory Review shall not exceed the mean height and peak height shown on approved project exhibit maps.

Plan Requirements and Timing: Finished grade shall be consistent with the approved final grading plan. Height limitations shown on DRB approved plan sets considered through Advisory Reviews shall be adhered to during any future construction.

Monitoring: City staff shall verify compliance prior to issuance of a Coastal Development Permit/Land Use Permit or building/grading permit(s).

This measure would ensure that proposed project architecture would be approved and constructed according to plan.

G-19 Draft EIR Mitigation Measure AES-3.2.3 Monitoring has been revised to state,

Monitoring: Prior to final inspection of any future construction and issuance of Fire Station 10 occupancy, City staff shall verify that all above-ground utility connections and equipment is installed, screened, and painted per the DRB approved plans.

G-20 Draft EIR Section 2.6.7 Lighting states,

“Lighting at the Fire Station 10 entrance would be limited to the immediate vicinity sufficient to create a visually welcoming gateway. The public parking lot and public entry would be lit for safety, but would use shielded overhead lighting. The Apparatus Bay apron would require down-lighting at the front and rear overhang or would be down lit from the walls. Low level path lighting or bollards on motion sensors would illuminate walkways to employee parking and accessory site buildings. Accessory buildings and areas (such as the fuel station, hose drying rack, and truck turn-around) would require overhead lighting only when operations require and would be turned off when not in use. All other lighting would be shielded to avoid all glare extending offsite.”

Draft EIR Mitigation Measure AES-4.1 states,

“AES-4.1: Lighting Specifications. Any exterior lighting installed on the Project site shall be of low intensity, low glare design, and shall be hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent parcels. Exterior lighting fixtures shall be kept to the minimum number and intensity needed to ensure public safety. These lights shall be dimmed after 11 p.m. to the maximum extent practical without compromising public safety. Upward directed exterior lighting is prohibited except to light the flag pole. Lighting fixtures shall be appropriate for the architectural style of the structure and surrounding area.

Plan Requirements and Timing: The locations of all exterior lighting fixtures, complete cut-sheets of all exterior lighting fixtures, and a photometric plan prepared by a registered professional engineer showing the extent of all light and glare emitted by all exterior lighting fixtures shall be reviewed and approved by the DRB, and the Planning and Environmental Review Director, or designee, before the City issues a building permit for construction.

Monitoring: Before the City issues a certificate of occupancy, City staff, shall inspect exterior lighting features to ensure that they have been installed consistent with approved plans.

The above measure would substantially minimize the visual impacts associated with introduction of new sources of light and glare for construction of the Fire Station 10. The residual impact of creation of new sources of light and glare would be *adverse, but feasibly mitigated to less than significant (Class II).*”

Implementation of Draft EIR Mitigation Measure AES-4.1 would ensure that lighting would be directed downward such that glare would not be diffused offsite, including to The Townhomes residential site.

- G-21** Please see response to comment G-20. The flagpole night lighting, though illuminating the flag in an elevated direction, would be focused and not result in any dispersal of light or glare off site.

Steve Jolley

- G-22** Draft EIR Figure 2.5b, Site Improvement Plan (southern portion), illustrates that the southeastern portion of the Project site would be raised from 115 feet above sea level (ASL) to 119 ASL. The filling would be necessary to direct drainage away from the existing swale depression at the Project site southeastern corner, and would direct runoff to a series of infiltrating perforated pipes extending along the eastern project boundary. The drain would convey the runoff in a southwesterly direction, away from the eastern Project boundary (and the Hideaway Townhomes site) to an onsite subterranean retention basin.

The proposed Site Improvement Plan has been revised to reduce the elevation of finished topography by approximately 1.5 feet in the southeastern Project corner. The finished floor elevation of the storm drain along the eastern project boundary has been lowered from 119.56 feet ASL to 118.16 feet ASL. Drainage would still be effectively directed through the subsurface storm drain to the infiltrating perforated pipes extending along the eastern project boundary on the east side of the proposed Fire Station driveways. The use of fill is required to provide for positive drainage flow to the storm drain that would avoid ponding in the southeastern corner of the Project site and stormwater overflow on to The Hideaway residential site.

G-23 Draft EIR Section 2.6.5 Landscaping Plan has been revised (revised text is underlined and deleted text is struck out) as follows:

“The areas adjacent to and around the structure and exterior facilities would be landscaped with a mixture of native and drought tolerant plantings (see Figure 2-11). The planting design would provide appropriate examples of fuel management plant design materials to be used in the three different Project site planting zones. Screening vegetation along the northern and eastern property boundary, including large three (3) 24- to 36- to 48-inch box specimen native Monterey cypress, five (5) 48-inch box native coast live oak, six (6) 36-inch box native coast live oak, and fourteen (14) 24-inch box *Arbutus marina* (Marina strawberry) New Zealand Christmas trees, would achieve a height of between 30 to 50 feet. Thirty-five (35) native lemonade berry bushes would be planted between the specimen trees and achieve a height of 10 feet. One Monterey cypress (in the northeastern corner), one (1) 36-inch box coast live oak, four (4) *Arbutus marina* trees, and sixteen (16) lemonade berry bushes would be planted along the eastern project boundary. One (1) 36-inch box coast live oak, five (5) 24-inch box coast live oak, and nineteen (19) lemonade berry bushes would be planted along the eastern project boundary.

The linear arrangement of large screen trees and bushes would be complimented by smaller native and drought-tolerant shrubs reaching 12 to 20 feet high. The landscaping would provide a visual separation between the fire station institutional uses and The Hideaway residential development to the east, and southerly views from US 101 and residential neighborhoods to the north. Other native and drought-tolerant shrubs would be planted in landscaping experienced from Hollister Avenue looking northward.”

G-24 Draft EIR Section 4.2, Impact BIO-3, states,

“The potential exists for disturbance of active raptor nests and other bird nests in trees and shrubs within and adjacent to the Project site should construction occur during the bird breeding season (February 1- August 15). In addition, the GP/CLUP Conservation Element Policy 8.4 requires protection of active and historical raptor nest sites when feasible. In

addition to the removal of eucalyptus and ornamental landscape trees, construction of the Project would require removal of all shrub and grassland vegetation onsite. Several different species of birds would potentially nest in the vegetation onsite and adjacent to the Project site. If nests were to exist when construction were undertaken, this action would result in a short-term *potentially significant impact* (Class II) on biological resources.”

As seen above, the Draft EIR does identify removal of the eucalyptus trees during the raptor nesting season as a potentially significant impact on biological resources.

According to this Draft EIR testimony, a raptor nest has been observed recently onsite (Bill Shelor 2018, Steve Jolley 2018; Section 7.0, Comment F-3 and F-24). The Draft EIR identifies that nesting raptors were observed in 2010, though not during 2016 birding surveys. It is reasonable to conclude that raptors periodically use the eucalyptus trees for nesting. Given this potential, Draft EIR Mitigation Measure BIO-3 requires that:

“Vegetation removal including clearing and grubbing and tree trimming shall avoid the bird nesting season (February 1st – August 31st) as feasible to ensure protection of breeding birds potentially on site and directly east and north of the Project site during the site preparation and construction. If avoidance of the bird nesting season is infeasible, pre-construction breeding bird surveys shall be performed by a qualified, City-approved biologist. Nesting bird pre-construction surveys shall occur within the area to be disturbed and extend outward 500 ft. or to the property boundary.”

“If any occupied bird nests or cavity roosts are found, the biologist shall determine an appropriate buffer zone that considers the bird species, nest location, nest height, existing pre-construction level of disturbance in the vicinity of the nest, and proposed construction activities. A buffer ranging in size from 100 ft. for nesting passerine species to 500 ft. for nesting raptors shall be determined and demarcated by the biologist.”

These survey procedures are based on standard protocols promulgated by the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (USFWS 2014). The Winter and Nesting Raptor Survey Protocols attached to the CCC comment letter, however, have been incorporated as refinements to Draft EIR Mitigation Measure BIO-3 to comply with the CCC standard protocols. Revisions to Draft EIR Mitigation Measure BIO-3 are identified in underlined text below:

“A winter raptor survey shall be conducted between December 1 and February 15 performed by a qualified, City-approved biologist with formal training in avian biology, significant field experience in raptor survey techniques, and demonstrated ability to identify accurately local species under a variety of field conditions. The survey shall consist of at least five visits, spaced at least one week apart. Each visit shall

consist of at least two hours on site during the period between dawn and 10:00 am. The biologist shall specifically search for foraging birds and birds using trees for perching, roosting, or nesting. The survey report shall provide a list of species that could reasonably be expected to use habitats on the site under other probable winter weather or prey conditions, and a list of wintering species that are known to have used the site in the past.

Vegetation removal including clearing and grubbing and tree trimming shall avoid the bird nesting season (February 1st – August 31st) as feasible to ensure protection of breeding birds potentially on site and directly east and north of the Project site during the site preparation and construction. If avoidance of the bird nesting season is infeasible, pre-construction breeding bird surveys shall be performed by a qualified, City-approved biologist with formal training in avian biology, significant field experience in raptor survey techniques, and demonstrated ability to identify accurately local species under a variety of field conditions. Nesting bird pre-construction surveys shall occur within the area to be disturbed and extend outward 500 ft. or to the property boundary. The survey shall be conducted between March 1 and June 15. The survey shall consist of at least five visits, spaced at least one week apart. Each visit shall consist of at least two hours on site during the period between dawn and 10:00 am. The biologist shall specifically search for nests and for foraging birds and birds using trees for perching, roosting, or nesting. The survey report shall provide a list of species that could reasonably be expected to use habitats on the site under other probable weather or prey conditions, and a list of species that are known to have used the site in the past.

Plan Requirements and Timing: The applicant shall submit a winter raptor survey and a nesting raptor survey plan, including the name and qualifications of the biologist that will conduct such survey, to the California Coastal Commission (CCC) Executive Director and the City for staff review and approval. The results of the survey shall be submitted to the CCC Executive Director and City for staff review and approval prior to the issuance of any grading or building permits.

The residual impact of this feasible mitigation is refined in the Final EIR, as stated below:

Implementation of Mitigation Measure BIO-3 would reduce the potential to disturb sensitive bird nesting during construction. The residual impact on biological resources would be *adverse, but feasibly mitigated to less than significant* (Class II). Future raptor nesting would feasibly continue within eucalyptus woodland and raptor nesting habitat in the vicinity of the Project site including the Sandpiper Golf Course to the south, along the north side of Hollister Avenue and south of U.S. 101 adjacent to Haskells Beach Park and the Bacara Resort and Spa to the west, the Ellwood Mesa Preserve to the southeast, and between the Union Pacific

Railroad tracks and US 101 extending to Ellwood School east of the Project site.

Kevin Barthel

G-25 This comment does not address the adequacy of the Draft EIR. No response is required.

G-26 Draft EIR Section 4.1.1 Visual Resources Existing Setting explains that views along Hollister Avenue are considered scenic. But the eucalyptus trees onsite are not contributing elements to the scenic quality of this view. The Draft EIR has been revised to state (added text is underlined):

“**Views from Hollister Avenue.** The full length of Hollister Avenue is designated as scenic in the City’s GP/CLUP EIR (City of Goleta 2006) because of the views it offers of the Santa Ynez Mountains and agricultural foothills to the north, as well as the Pacific Ocean and Channel Islands to the south. The eucalyptus woodland within the Project site is not identified as a contributing element to this scenic character.”

Impact AES-3.1 states:

“A previous tree survey identified numerous dead eucalyptus trees, and others where several large branches may pose potential hazards; these trees do not qualify as scenic resources.”

The Draft EIR Impact AES-3.1 analysis has been augmented as follows:

City of Goleta Visual Aesthetic Impact Guidelines state (page 182): “Assessing the visual impacts of a project involves two major steps. First, the visual resources of the project site must be evaluated. Important factors in this evaluation include the physical attributes of the site, its relative visibility, and its relative uniqueness. In terms of visibility, four types of areas are especially important: coastal and mountainous areas, the urban fringe, and travel corridors.” The existing eucalyptus trees on site are located within the urban fringe and along a travel corridor. However, their integrity and condition are compromised due to their declining health. They are also not unique, given the much more substantial concentration of woodland farther to the west, north of Haskells Beach and the Bacara Resort and Spa, the Ellwood Mesa Preserve to the southeast, and between the Union Pacific Railroad tracks and US 101 extending to Ellwood School east of the Project site. Therefore, the limited stand of eucalyptus woodland onsite is not considered a scenic visual resource.

G-27 Please see response to comment G-28. The integrity and condition of the existing eucalyptus trees on site are compromised due to their declining health. They are also not unique, given the much more substantial concentration of woodland farther to the west, north of Haskells Beach and the Bacara Resort and Spa, the Ellwood Mesa Preserve to the southeast, and between the Union Pacific Railroad tracks and US 101 extending to

Ellwood School east of the Project site. Therefore, the limited stand of eucalyptus woodland onsite is not considered a scenic visual resource.

- G-28** Draft EIR Section 4.2.2 Biological Resources Project Site Setting, states,
- “A tree inspection was also performed for the Project site, the results of which are included in the City of Goleta Tree Inspection Report that cited multiple dead and failing eucalyptus trees at that time (Robert Muraoka, City Arborist, 2016). An updated tree survey was conducted by WEI on February 9, 2017 (WEI 2017; Appendix C-1). Six (6) of the eucalyptus trees on-site were identified as dead at that time. Additionally, several other eucalyptus trees were identified as severely leaning and structurally compromised, which pose a threat to public safety because of ladder fuel fire hazard or potential to fall on passing vehicles (WEI 2017; Appendix C-1).”

- G-29** Draft EIR Section 2.3 Project Objectives, states:

“The need for Fire Station 10 in western Goleta was identified as early as 1967 during a regional assessment of long-term growth in the Goleta Valley by the National Board of Fire Underwriters for fire protection services. The SBCFD subsequently determined the need for an additional fire station in the western Goleta Valley due to high response times and population growth in the 1980’s. This need was highlighted in the County of Santa Barbara’s Goleta Community Plan (adopted in August 1993), which identified a conceptual fire station site at or in proximity to the Project site. The City’s General Plan/Coastal Land Use Plan Public Facilities Element approved in 2006 identified the proposed Project site as the appropriate location for the fire protection service expansion.”

Draft EIR Figure 2-2 City of Goleta Fire Station 5-Minute Response Zones illustrates the location of proposed Fire Station 10 relative to other existing stations in the vicinity. This strategic location would enhance the fire protection response in a geographically underserved area.

- G-30** First response to emergencies requires the use of the most direct roadway to ensure public safety. No detours away from Hollister Avenue are feasible (SBCFD Division Chief Martin Johnson, personal communication 2018).
- G-31** The proposed roadway on the eastern property boundary adjacent to The Hideaways residential site would provide access for employees and community training only. No fire station engine use would occur on the easterly roadway. Draft EIR Table 4.9-4 identifies fewer than 20 average daily (one-way) trips that would access this eastern driveway. Screening landscaping including trees would be planted between the roadway and the driveway, effectively segregating the fire station traffic from adjacent residential uses.
- G-32** Draft EIR Section 2.6.1, Project Description, Construction, explains that removal of the eucalyptus trees on site is necessary to achieve compliance

with The Essential Services Buildings Seismic Safety Act of 1986 (Health & Safety Code Division 12.5, Chapter 2, Article 1, Section 16001). The Draft EIR explains that the Act...

“states that essential facilities such as Fire Station 10 shall be designed and constructed to minimize fire hazards,’ and that nonstructural components vital to the operation of essential services buildings shall be able to resist, insofar as practical, the forces generated by fire and winds. The Act provides local discretion in determining how minimizing fire hazards can be accomplished. The SBCFD Fire Marshal has determined that existing eucalyptus trees on the Fire Station 10 Project site are a fire hazard given their potential flammability (Division Chief/ Fire Marshall Steve Oaks, SBCFD, personal communication 2017). A previous tree survey of the Project site (Robert Muraoka, 2016) identified numerous dead eucalyptus trees, and others where several large branches had failed and broken off. These large limbs may pose potential hazards to adjacent land uses. Trimming of large eucalyptus tree limbs along the eastern Project site boundary has occurred as the request of adjacent The Hideaway neighbors. Therefore, existing eucalyptus woodland totaling 56 eucalyptus trees, as well as other potentially flammable vegetation including coastal sage scrub and non-native grassland, would be removed from the Project site to ensure fire hazards are minimized pursuant to the Essential Services Act.”

Therefore, removal of the existing eucalyptus trees onsite is required to meet the basic project objectives of the proposed fire station.

The necessity to achieve this basic project objective is included in the revised Final EIR, Section 5.2.2, Minimize Potentially Significant Environmental Impacts in underlined text:

“The potentially significant environmental impacts associated with the proposed Fire Station 10 project are exclusively associated with the project location, rather than size, bulk, or appearance. For example, there is no potential impact resulting from the size or intensity of the station’s use that would result in impacts on air quality, greenhouse gas emissions, operational noise, or transportation/circulation. Removal of the 56 eucalyptus trees onsite (Impact BIO-3) is required to achieve compliance with The Essential Services Buildings Seismic Safety Act of 1986, as the SBCFD Fire Marshal has determined that existing eucalyptus trees on the Fire Station 10 Project site are a fire hazard given their potential flammability (Division Chief/ Fire Marshall Steve Oaks, SBCFD, personal communication 2017) (see Section 2.6.1, Project Description, Construction). Therefore, existing eucalyptus woodland totaling 56 eucalyptus trees, as well as other potentially flammable vegetation including coastal sage scrub and non-native grassland, would need to be removed from the Project site to ensure fire hazards are minimized pursuant to the Essential Services Act. This is considered a basic project objective such must be retained in any

feasible onsite project alternative.

Feasible fire station design must include sufficient square footage for three emergency vehicle bays in the main building, as well as space for on-call personnel. Space requirements include sufficient area for vehicular access to Hollister Avenue, where a clear zone would be established for emergency vehicles leaving the fire station bays, and for the internal access turnaround geometry to accommodate fire truck refueling. The proposed fire station parcel size was selected given that it provided sufficient area for these required space needs, but does not have excess area for substantial avoidance of onsite eucalyptus trees. Relocation of the fire station structural footprint westward to avoid existing eucalyptus trees would not provide for a sufficient setback of the vehicle bay egress from the intersection of Hollister Avenue and Cathedral Oaks Road. Given the limited acreage of the Project site and infrastructure space requirements, any reduction in the proposed structural footprint, internal access road and paved areas is infeasible.

- G-33** Draft EIR Section 4.1.1 Visual Resources Existing Setting explains that views along Hollister Avenue are considered scenic. But the eucalyptus trees onsite are not contributing elements to the scenic quality of this view. The Draft EIR has been revised to state (added text is underlined):

“Views from Hollister Avenue. The full length of Hollister Avenue is designated as scenic in the City’s GP/CLUP EIR (City of Goleta 2006) because of the views it offers of the Santa Ynez Mountains and agricultural foothills to the north, as well as the Pacific Ocean and Channel Islands to the south. The eucalyptus woodland within the Project site is not identified as a contributing element to this scenic character.

Impact AES-3.1 states:

“A previous tree survey identified numerous dead eucalyptus trees, and others where several large branches may pose potential hazards; these trees do not qualify as scenic resources.”

The Draft EIR Impact AES-3.1 analysis has been augmented as follows:

City of Goleta Visual Aesthetic Impact Guidelines state (page 182): “Assessing the visual impacts of a project involves two major steps. First, the visual resources of the project site must be evaluated. Important factors in this evaluation include the physical attributes of the site, its relative visibility, and its relative uniqueness. In terms of visibility, four types of areas are especially important: coastal and mountainous areas, the urban fringe, and travel corridors.” The existing eucalyptus trees on site are located within the urban fringe and along a travel corridor. However, their integrity and condition are compromised due to their declining health. They are also not unique, given the much more substantial concentration of woodland farther to the west, north of

Haskells Beach and the Bacara Resort and Spa, the Ellwood Mesa Preserve to the southeast, and between the Union Pacific Railroad tracks and US 101 extending to Ellwood School east of the Project site. Therefore, the limited stand of eucalyptus woodland onsite is not considered a scenic visual resource.

Draft EIR Section 2.5.3 Architecture states,

“The architectural elements reflect some of the early vernacular forms of the Goleta Valley. These include water towers, barn-like mass & volumes and low-profile ranch houses. The roof forms are broken-up into staggered gables and a hipped roof to lower the apparent height of the apparatus bay.

The exterior finishes and features also relate to the building’s residential/agrarian context through the use of traditional items, such as board and batt wood siding, and an architectural projection element suggesting a historic water tower that includes a plaster base, splayed walls, and small window pane articulations.”

This architecture has been carefully designed given the proposed fire station’s location at the city gateway. It would provide a definitive government institutional structural statement consistent with the importance of this location.

G-34 The Draft EIR used precise computer simulations of the proposed fire station architecture and landscaping (see Figures 4.1-2 and 4.1-3). These techniques have been consistently used in City of Goleta EIRs to accurately characterize the nature of proposed architecture compatibility with surrounding land uses. CEQA Guidelines Section 15151 Standards for Adequacy of an EIR, states,

“An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.”

The use of story poles in addition to the computer video-simulations is not required to provide an adequate standard of environmental review.

