

B-12


ASSOCIATED TRANSPORTATION ENGINEERS

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July 18, 2006

04098L07.WP

 Ken Curtis
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 City of Goleta
 130 Cremona Drive, Suite B
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**CITY OF GOLETA GENERAL PLAN/COASTAL LAND USE PLAN DEIR -
 COMMENTS ON THE TRANSPORTATION AND CIRCULATION SECTION**

Associated Transportation Engineers (ATE), in affiliation with the Goleta Valley Chamber of Commerce, has reviewed the Transportation and Circulation section of the City of Goleta General Plan/Coastal Land Use Plan DEIR and has prepared the following comments.

Comment 1: Page 3.13-3, Table 3.13-2. The table presents P.M. peak hour link volumes for the key arterial roadways located in the City, however, the analyses of roadway performance presented in the DEIR and the Transportation Element of the General plan are based on average daily traffic (ADT) volumes. This table should be modified to show ADT volumes in order to be consistent with the remainder of the DEIR section and to provide an accurate analysis of the proposed General Plan Transportation Element policies for roadway segments.

B.12-1

Comment 2: Page 3.13-3, LOS Standards. The text states that the City "has adopted a standard of LOS C" which is applied to signalized intersections. This section must also acknowledge that Policy 4.2 of the Transportation Element specifies that the intersection of Storke and Hollister is allowed to operate at LOS D (V/C ratio 0.90) because it is currently built out to its ultimate capacity as allowed under TE Policy 6.5. This is a significant LOS policy exception that must be acknowledged in the DEIR.

B.12-2

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Comment 3: Page 3.13-4, Roadway Classifications and Thresholds. The text states that the roadway classifications and thresholds used for the DEIR analysis are based on the "standards adopted by the County of Santa Barbara." The County of Santa Barbara uses a different set of roadway classifications (Primary 1, 2 & 3 Roadways and Secondary 1, 2, & 3 Roadways) than the classifications established in the Goleta Transportation Element (Major Arterials, Minor Arterials, Collector Roads, and Local Roads). It is not clear how the different set of County/City classifications are being correlated for the DEIR analysis. In order to be consistent with the Transportation Element, the DEIR needs to be revised to list the roadway classifications that are proposed in the Transportation Element and show the corresponding acceptable LOS C capacities (also see comment 5 below).

B.12-3

Comment 4: Page 3.13-6, Table 3.13-6. The roadway analysis presented in this table is based on ADT volumes which have been estimated using P.M. peak hour link volumes. The actual ADT volumes on the roadways, determined based on 24-hour machine traffic counts, can be significantly different than the volumes presented in the table and may yield different impact findings and mitigation requirements.

For instance, machine traffic counts conducted by the City of Goleta for the section of Storke Road north of Hollister show an existing ADT volume of 36,300 ADT, which is an existing deficiency based on the roadway capacities presented in the DEIR. Table 3.13-6 shows an ADT volume of 30,440 ADT for Storke Road and indicates that the segment is not currently deficient. Similarly, the volumes reported in the table for Fairview Avenue between Hollister and U.S. Highway 101 are 28,710 ADT, while the machine counts completed by the City show a volume of 19,200 ADT. The difference in the estimated and actual volumes on this roadway will affect the future analysis which shows that Fairview Avenue will be deficient under buildout conditions.

B.12-4

The table must be updated to present actual ADT volumes which have been counted by the City rather than estimated volumes which do not correlate to the real ground counts. The impact analyses and findings contained in DEIR need to be updated based on the correct ADT volumes.

Comment 5: Page 3.13-6, Table 3.13-6. The roadway classifications listed in this table do not correlate to the roadway classifications contained in the Transportation Element for the City's roadways. The roadway classifications used in the DEIR must be consistent with the roadway classifications proposed in the Transportation Element. A correlation between the County's old classifications and the City's new classifications should be provided in the DEIR.

B.12-5

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Comment 6: Page 3.13-9, City of Goleta LOS Standard. The text states that "the City of Goleta has adopted a standard of LOS C". This section must acknowledge that revised Policy 4.2 of the Transportation Element allows the intersection of Storke and Hollister to operate acceptably at LOS D (V/C ratio 0.90) because it is currently built out to its ultimate capacity as allowed under TE Policy 6.5.

The City's CEQA thresholds must be revised to reflect this policy. Without this revision, there is a disconnect between Transportation Element Policy 4.2 that allows the intersection to operate acceptably at LOS D and the CEQA thresholds which, as currently written, state that any project that adds 15 or more trips to an intersection operating at LOS D would generate a significant impact. This is a critical link between the CEQA thresholds and the TE policies.

TE Policy 13.3 requires all developments, including housing projects, to mitigate all project-specific impacts in order to be deemed consistent with the General Plan. If the CEQA thresholds are not modified to reflect Policy 4.2, even small housing projects located in the study-area will have the potential to generate a project-specific impact at the intersection. Since the Storke/Hollister intersection is built out to its maximum capacity allowed under TE Policy 6.5, no additional mitigation measures can be implemented at the intersection. Thus the only mitigation that a housing project could seek for a project-specific impact at this location would be to construct one or both the proposed overcrossings of U.S. 101 (at Ellwood Station Road and La Patera) or to wait until the overcrossings are funded and scheduled to be constructed by the City. These mitigations would be financially infeasible for any one project to accomplish; and the funding of the improvements by the City is at least 20 to 25 years out. Thus even the smaller housing projects located in the Storke Road area would be deemed inconsistent with the Transportation Element policies and would be denied if the CEQA thresholds are not revised to be consistent with Policy 4.2.

B.12-6

Comment 7: Page 3.13-10, Table 3.13-5. As noted in the preceding comment, the City has established LOS D (V/C ratio 0.90) as the acceptable level for the Storke/Hollister intersection. The table needs to be updated to include a footnote or other reference to the different LOS policy that has been established for this intersection.

B.12-7

Comment 8: Page 3.13-10, Threshold Criteria. No threshold criteria are provided for determining impacts to roadway segments. Since the City Transportation Element policies include criteria linking CEQA impacts to policy consistencies for roadways, a quantitative set of impact criteria for roadways must be included in the DEIR. This will affect both the DEIR analysis of the General Plan and the analysis of individual projects proposed in the City.

B.12-8

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Comment 9: Page 3.13-16, Roadway Segments. As noted above in Comment 4, the analysis of roadway segments needs to be updated based on the actual roadway ADT volumes that have been counted by the City rather than estimated volumes using P.M. peak hour intersection counts. The estimated volumes do not correlate to the real ground counts and the use of 24-hour volumes counted on the roadway links will change the findings of the analysis and the required mitigation measures.

B.12-9

Comment 10: Page 3.13-17, Table 3.13-8. The roadway classifications listed in this table need to be consistent with the roadway classifications proposed in the Transportation Element.

B.12-10

Comment 11: Page 3.13-18, Analysis of Future Scenarios. This section discusses the future analysis scenarios that are examined in the DEIR. They include buildout of the General Plan Land Use Element with no improvements and buildout with all of the future improvement projects that have been identified as potential mitigation measures, including the two new overcrossings of U.S. Highway 101 (at Ellwood Station Road and La Patera).

It is noted that there have been no engineering and design feasibility studies prepared to confirm that the two new overcrossing structures are feasible; and there have been no investigations regarding the potential funding sources that could be used to construct the overcrossings. Given the uncertain nature of the design and funding of these overcrossings, the DEIR needs to include a third scenario which analyzes future conditions with the proposed roadway and intersection improvements excluding the two overcrossing structures. The DEIR must also include a discussion of the engineering feasibility and costs of the overcrossings. This will provide the decision makers with the information required to determine the costs and benefits of these two major infrastructure improvements.

B.12-11

Comment 12: Page 3.13-22, Table 3.13-10. As noted above in Comment 4, the analysis of roadway segments should be based on the actual roadway ADT volumes that have been counted by the City rather than estimated volumes using P.M. peak hour intersection counts, as these estimated volumes do not correlate to the real ground counts. It is anticipated that the deficiency identified in the table for the section of Fairview south of U.S. 101 will be eliminated when if the corrected ADT volumes are used.

B.12-12

Comment 13: Page 3.13-22, Roadway LOS Analysis. The DEIR text does not include a detailed analysis of the operations of the U.S. 101 and Route 217 freeway segments that are located in the City. Page 3.13-27 provides only a brief overview of freeway operations and deficiencies. Given that the DEIR is examining buildout of the General Plan, a more thorough evaluation of freeway operations, deficiencies and mitigations is required in the body of the document.

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Comment 14: Page 3.13-23, Table 3.13-11. The table listing Recommended Major Infrastructure Improvements does not include the anticipated widening of U.S. 101 to 6-lanes between Fairview Avenue and Winchester Canyon Road, which is a mitigation measure required for General Plan Buildout. This freeway widening improvement is, in fact, included in the Transportation Element. The DEIR should be updated to include an analysis freeway operations and include the freeway widening as a mitigation measure.

B.12-14

Comment 15: Page 3.13-23 & 24, Tables 3.13-11 & 12. These tables list the major infrastructure and recommended intersection improvements which have been identified as mitigation measures required to accommodate the traffic growth generated by General Plan Buildout.

B.12-15

The DEIR provides no engineering design or cost estimate information for the recommended mitigation measures to confirm their feasibility. Given the magnitude of the proposed improvements and the significant right-of-way that may be required to implement them, additional engineering design and cost data must be provided in the DEIR to confirm the economic and environmental feasibility of the mitigations.

Comment 16: Page 3.13-24, Funding Discussion. The DEIR states that one possible funding source for the proposed transportation improvements needed to accommodate future buildout of the General Plan is Measure D funds. However, revised Policy TE 14.7 of the Transportation Element states that Measure D "funding shall not be used to subsidize and/or reduce the transportation improvement cost attributable to future development". The revised language in Policy 14.7 implies that utilization of Measure D funds to construct transportation improvements required to serve future developments allowed under the General Plan Land Use Element will be prohibited. The DEIR needs to clarify the implications of this policy with the funding discussion contained in the document.

B.12-16

Comment 17: Page 3.13-24, Table 3.13-12. The table includes a project under Roadway Segments to widen the section of Storke Road south of U.S. 101 from 2 to 4 lanes. This roadway segment is already 4-lanes wide and the table needs to be corrected.

B.12-17

Comment 18: Page 3.13-28, Hollister Avenue/Storke Road. The DEIR identifies the Hollister Avenue/Storke intersection as a Class I impact (significant and unavoidable) because the residual operation after mitigation is forecast at LOS D. However, as noted in previous comments, the City has established LOS D (V/C ratio 0.90) as an acceptable operational level for the intersection. The Class I findings are therefore inconsistent with the General Plan policy for this intersection which states that LOS D is an acceptable level of operation.

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Comment 19: Page 3.13-30, Roadway Segments. The discussion of impacts, mitigations, and residual impacts for roadway segments does not include the impacts to the U.S. 101 freeway or the mitigation measure of widening the freeway to 6-lanes between Fairview Avenue and Winchester Canyon Road. The DEIR should be updated to include a discussion of the freeway operations, the required mitigation measures, and the residual impacts.

B.12-19

Comment 20: Page 3.13-36, Residual Impacts. The DEIR identifies the residual impact at the Hollister Avenue/Storke Road intersection as a Class I impact (significant and unavoidable), because the residual operation after mitigation is forecast at LOS D. However, the City has established LOS D (V/C ratio 0.90) as an acceptable operational level for the Storke/Hollister intersection. The Class I findings are therefore inconsistent with the proposed General Plan policy for this intersection which states that LOS D is an acceptable level of operation for this location.

B.12-20

This concludes our review of Transportation and Circulation section of the City of Goleta General Plan/Coastal Land Use Plan DEIR.

Associated Transportation Engineers

By: 
Scott A. Schell, AICP
Principal Transportation Planner

SAS:wp

cc: Kristin Amyx, Goleta Valley Chamber of Commerce

Response to Comment No. B.12-1

The commentator states that Average Daily Traffic (ADT) volumes, which provide the basis for roadway segment LOS analysis, should be provided in the EIR. ADT volume information is provided in DEIR Table 3.13-4. This table has been moved in the FEIR so that it is located in the section in which it is referenced.

Response to Comment No. B.12-2

The commentator states that Policy 4.2, which defines the LOS standard at Hollister/Storke as LOS D, should be explicitly acknowledged in the EIR as a significant LOS policy exception. Text has been revised in FEIR Section 3.13.1.1 to acknowledge this policy more clearly.

Response to Comment No. B.12-3

The commentator points out inconsistency between the City functional classifications, and the functional classifications that provide the basis for roadway segment LOS standards in the DEIR. Revisions have been made to the FEIR that address this comment. All information in the FEIR, including LOS standards for roadway segments, is now based upon City functional classifications.

Response to Comment No. B.12-4

The commentator states that existing conditions assessment for roadway segments should be based upon ground counts, not model estimates. The City used estimated counts because they are considered more accurate than using actual counts, which can vary noticeably throughout the year. The City estimated ADT to ensure consistency in the methodology used for both existing and future ADT estimates. Estimates were reviewed by engineers and determined to be reasonable, which further substantiated the applicability of their use.

Response to Comment No. B.12-5

The commentator points out inconsistency between the City functional classifications, and the functional classifications that provide the basis for roadway segment LOS standards in the DEIR. See response to comment B-12.3.

Response to Comment No. B.12-6

The commentator states that Policy 4.2, which defines the LOS standard at Hollister/Storke as LOS D, should be explicitly acknowledged in the EIR as an LOS policy exception. The commentator also suggests that the City's CEQA thresholds be revised to reflect Policy 4.2.

The text has been revised in the FEIR to acknowledge Policy 4.2 more clearly. The City has adopted CEQA thresholds or standards, summarized in Table 3.13-5, that are more rigorous than the GP/CLUP LOS policy standards. Under this definition, it is possible for a significant CEQA impact to be identified even if the location is not projected to exceed GP/CLUP LOS standards, as is the case in the future projections at the Hollister/Storke intersection. Rather than assume denial of future development based upon the LOS C CEQA threshold, future project-level CEQA documents would pursue approval of a Statement of Overriding Considerations in accordance with CEQA. No changes to the City's CEQA thresholds are necessary at this time.

Response to Comment No. B.12-7

The commentator requests that a footnote be added to Table 3.13-5 acknowledging that the City has a GP/CLUP policy standard of LOS D for the Storke/Hollister intersection. The requested footnote has been added.

Response to Comment No. B.12-8

The commentator states that no threshold criteria are provided for roadway segment analysis. The commentator is directed to Table 3.13-8, which provides the roadway segment LOS thresholds.

Response to Comment No. B.12-9

The commentator states that existing conditions assessment for roadway segments should be based upon ground counts, not model estimates. See response to comment B.12-4.

Response to Comment No. B.12-10

The commentator states that roadway functional classifications in Table 3.13-8 should be consistent with City functional classifications defined in the Transportation Element of the GP/CLUP. See response to comment B.12-3.

Response to Comment No. B.12-11

The commentator notes that no engineering or design feasibility studies have been completed for the proposed freeway crossings, and states that cost and engineering feasibility must be discussed in the EIR. The analysis and level of detail presented to evaluate the potential environmental impacts to transportation identified in the EIR are consistent with the level of detail for a programmatic, General Plan policy document. The setting, impacts, and mitigation discussions presented in the EIR are all, by definition, program level. Until such time as the specific implementing projects are designed and evaluated, it is not possible to include more specific detail on levels of impacts or specific mitigation measures. PS&E-level detailed plans are not completed for planning-level GP/CLUP analysis (Riverwatch vs. San Diego County, 1999). Analysis and design at this level will be completed as part of project implementation.

Response to Comment No. B.12-12

The commentator states that existing conditions assessment for roadway segments should be based upon ground counts, not model estimates. See response to comment B.12-4.

Response to Comment No. B.12-13

The commentator states that the DEIR text does not include detailed analysis at the US-101 and SR-217 freeway segments. Traffic results in the DEIR reflect weaving analysis at US-101 and SR-217. The commentator is directed to page 52 of the traffic technical appendix, which provides more detailed information regarding this analysis.

Response to Comment No. B.12-14

The commentator notes that widening of US-101 to six lanes between Fairview Avenue and Winchester Canyon Road is not listed the Summary of Major Infrastructure Improvements. This project was included in the analysis for the DEIR, and has been added to Table 3.13-11 in the FEIR.

Response to Comment No. B.12-15

The commentator notes that no engineering design or cost estimates for proposed projects are included in the DEIR, and indicates that they should be provided. See response to comment B.12-11.

Response to Comment No. B.12-16

The commentator states that text in the DEIR identifies Measure D funds as one potential funding source for transportation improvements, but that language in Policy TE 14.7 implies that Measure D funds are prohibited. The City cannot use general fund money to pay for the costs attributed to future development, and has clarified this in Section 3.13.3.4 of the FEIR.

Response to Comment No. B.12-17

The commentator notes that Storke Road, south of US-101, is four lanes wide under existing conditions, and that the text in Table 3.13-12 does not accurately reflect that description. Storke Road is currently two lanes in each direction. Under the proposed improvement, the City would add 1 to 2 lanes in each direction. Clarification has been made to FEIR Table 3.13-12.

Response to Comment No. B.12-18

The commentator notes that the DEIR identifies a Class I impact at Hollister/Storke, even though the LOS D projected at that location does not exceed the standard as defined in Policy TE 4.2; and states that this is inconsistent. The City has adopted CEQA standards or thresholds of significance, summarized in Table 3.13-5, that are more rigorous than the adopted LOS standards. Under this definition, it is possible for a significant impact to be identified even if the location is not projected to exceed a GP/CLUP LOS standard, as is the case in the future projections at the Hollister/Storke intersection. See response to comment B.12-6.

Response to Comment No. B.12-19

The commentator states that analysis of US-101 should be included in the DEIR, and notes that widening of US-101 to six lanes between Fairview Avenue and Winchester Canyon Road is not listed the Summary of Major Infrastructure Improvements. This project was included in analysis for the EIR, and has been added to Table 3.13-11 in the FEIR. The commentator is directed to the traffic technical appendix for more detailed information regarding the analysis of US-101.

Response to Comment No. B.12-20

The commentator notes that a Class I impact is identified at Hollister/Storke under the Residual Impacts discussion, even though the LOS D projected at that location does not exceed the standard as defined in Policy TE 4.2; and states that this is inconsistent. See responses to comments B.12-6 and B.12-18.

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July 18, 2006

Mr. Ken Curtis
 Director of Planning & Environmental Services
 Planning & Environmental Services Department
 City of Goleta
 130 Cremona Drive, Suite B
 Goleta, California 93117

SUBJECT: City of Goleta, Draft General Plan / Coastal Land Use Plan (May 2006)
 Draft Environmental Impact Report (DEIR)

Dear Mr. Curtis:

Thank you for the opportunity to comment on the above referenced Draft Environmental Impact Report (DEIR). Having reviewed the document, our project team has prepared the following comments on behalf of the Goleta Valley Cottage Hospital:

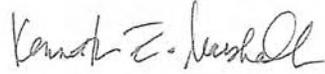
- **Page 3.1-8, Aesthetics & Visual Resources; Project Impacts & Mitigation (Project Impacts):**

 - Reference is made to Figures 3.1-1 and 3.10-2 relating to potential visual resource impacts. Figure 3.10-2 provides numbers of vacant sites (i.e., #117); but I could not find an index that explained what these sites were (i.e., APN, project owner name, address, etc). This is especially important because, starting on page 3.1-9, sites are referenced as having the potential for impacting visual resources. **B.13-1**
 - What visual impact is anticipated from Site 32? Without specifics, it is impossible to comment on this item. (see comment immediately above)
- **Page 5.14, Alternatives to the Proposed Projects; Land Use and Recreation:** Be specific as to what density reductions for each of the 22 sites, for both 5.4.10.2 and 5.4.10.3. **B.13-2**

This completes our comments on the Draft EIR. Should you have any questions regarding our comments, please don't hesitate to give me a call at (805) 963-0651, ext. 21. I may also be e-mailed at kmarshall@dudek.com.

Sincerely,
 DUDEK & Associates, Inc.

Mr. Ken Curtis
July 18, 2006
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Kenneth E. Marshall, AICP
Principal Planner

cc: Ron Biscaro
Diane Wisby

Response to Comment No. B.13-1

The commentator has requested that an index be included with Figure 3.10-2 to explain what the site numbers represent. The site numbers on Figure 3.10-2 correspond to sites identified as vacant during the Land Use Inventory conducted in 2005 for the GP/CLUP, as noted on the figure. The figure is intended as a reference tool, not an analytical tool. The numbers are used in resource-specific discussions in order to characterize a particular resource or a vacant site.

The commentator also asks what visual impact is anticipated from Site 32. Visual impacts related to Site 32 are addressed in the EIR text under Impact 3.1-1b.

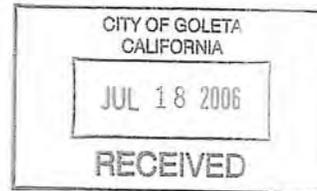
Response to Comment No. B.13-2

The commentator has requested that the EIR identify site-specific reductions in density proposed at 22 sites for both Alternatives 1 and 2. Provision of the requested level of detail is not applicable to this programmatic GP/CLUP. The degree of specificity and technical detail provided in the text of the DEIR is sufficient for the public to assess the project's potential environmental impacts. See response to comment B.2-3.

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July 18, 2006

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 Director of Planning & Environmental Services
 Planning & Environmental Services Department
 City of Goleta
 130 Cremona Drive, Suite B
 Goleta, California 93117

SUBJECT: City of Goleta, Draft General Plan / Coastal Land Use Plan (May 2006)
 Draft Environmental Impact Report (DEIR)

Dear Mr. Curtis:

Thank you for the opportunity to comment on the above referenced Draft Environmental Impact Report (DEIR). Having reviewed the document, our project team has prepared the following comments on behalf of the Westar property owners (APN 073-030-020):

- **Page 3.1-8, Aesthetics & Visual Resources; Project Impacts & Mitigation (Project Impacts):**

 - What visual impact is anticipated from Site 84? Without specifics, it is impossible to comment on this item. (see comment immediately above)

B.14-1
- **Page 3.1-14, Aesthetics & Visual Resources; Project Impacts & Mitigation (Project Impacts):**

 - What visual impact is anticipated from Site 84? Without specifics, it is impossible to comment on this item.
- **Page 3.5-6a, Cultural Resources; Figure 3.5-1 (Historic Resources):** Please provide a note that Historic Resources site # 45 is an engineered cut for the railroad and that there are no restrictions on alterations to this resource.

B.14-2
- **Page 3.6-4a, Geology, Soils, and Mineral Resources; Figure 3.6-2 (Fault Map):** Please provide a note that the presence of an unnamed Inactive Fault inferred to run diagonally through Hollister Avenue, between Santa Felicia Drive and Los Carneros Road does not pose any constraint to future development in this area.

B.14-3
- **Page 5.14, Alternatives to the Proposed Projects; Land Use and Recreation:** Be specific as to what density reductions for each of the 22 sites for both 5.4.10.2 and 5.4.10.3.

B.14-4

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July 18, 2006
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This completes our comments on the Draft EIR. Should you have any questions regarding our comments, please don't hesitate to give me a call at (805) 963-0651, ext. 21. I may also be e-mailed at kmarshall@dudek.com.

Sincerely,
DUDEK & Associates, Inc.



Kenneth E. Marshall, AICP
Principal Planner

cc: Peter Koetting

Response to Comment No. B.14-1

The commentator asks what visual impact is anticipated from development of Site 84. Site 84 is a vacant parcel located north of Hollister Avenue and west of Glen Annie Road. Visual impacts to this parcel are discussed under Impacts 3.1-1a, 3.1-3a, and 3.1-3c in the DEIR, and would principally affect northerly views of the Santa Ynez Mountains and foothills to motorists along Hollister Avenue, southerly views from US-101, and views from selected public areas within the City. The specific visual impacts from future development of Site 84 are dependent upon project-specific features such as the future project location, mass, height, and design. These issues would be addressed in a future project-specific CEQA document, rather than in this programmatic-level GP/CLUP EIR.

Response to Comment No. B.14-2

Contrary to the commentator's statement that alterations to the "engineered cut" associated with Historic Resource # 45 should not be restricted during any proposed future activities, any such alterations would need to be assessed as possible impacts during Phase I and Phase II cultural resource studies as stipulated in Policy OS 8 of the General Plan.

Response to Comment No. B.14-3

The commentator requests that a note be added to Figure 3.6-2 regarding an inferred, unnamed, inactive fault. The fault referred to by the commentator is shown on a recent U.S. Geological Survey (USGS) map of the Santa Barbara area as "inferred from 1928 air photos" (Minor et al. 2003). It is not zoned by the State of California under the Alquist-Priolo Earthquake Fault Zoning Act and thus is not recognized by the state as an active fault. The Uniform Building Code (ICBO 1997) also does not specifically identify this structure as an active fault, although it is roughly on trend with and in proximity to the west end of the Mission Ridge-Arroyo Parida-Santa Ana fault system, which is recognized by the UBC as a Type B seismic source.

GP/CLUP policy subsection SE 4.2 requires that potentially active faults (i.e., faults that have shown movement in the last 1.6 million years) be subject to the same regulations as active faults. Thus, there is some possibility that the fault may be active, and it should probably be treated with caution although it is not explicitly zoned by the State of California as an active fault. As such the only way that it can be determined that the fault does not pose any constraint to future development in this area is to conduct a fault location investigation, consistent with Policy subsection SE 4.3.

Response to Comment No. B.14-4

See response to comment B.13-2.

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July 18, 2006

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SUBJECT: City of Goleta, Draft General Plan / Coastal Land Use Plan (May 2006)
 Draft Environmental Impact Report (DEIR)

Dear Mr. Curtis:

Thank you for the opportunity to comment on the above referenced Draft Environmental Impact Report (DEIR). Having reviewed the document, our project team has prepared the following comments on behalf of Sares-Regis:

- **Page 3.1-8, Aesthetics & Visual Resources; Project Impacts & Mitigation (Project Impacts):**
 - What visual impact is anticipated from Site 77? Without specifics, it is impossible to comment on this item. (see comment immediately above)
 - What visual impact is anticipated from Site 78? Without specifics, it is impossible to comment on this item. (see comment immediately above)
- **Page 3.1-14, Aesthetics & Visual Resources; Project Impacts & Mitigation (Project Impacts):**
 - What visual impact is anticipated from Site 77? Without specifics, it is impossible to comment on this item.
 - What visual impact is anticipated from Site 78? Without specifics, it is impossible to comment on this item.
- **Page 3.4-2a, Biological Resources; Figure 3.4-1 (Habitat Types):** The Cabrillo Business Park property is shown to have a larger area of riparian/marsh/vernal pool habitat than shown in site specific evaluations for that property. The City has available to it project-specific data for Cabrillo Business Park, which by law it must use. The same is true for a number of other parcels (i.e., Sandpiper).
- **Page 3.4-10a, Biological Resources; Figure 3.4-2 (Special-Status Habitats and Species):** The Cabrillo Business Park property is shown to have a larger area of

B.15-1

B.15-2

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| <p>riparian/marsh/vernal pool habitat than shown in site specific evaluations for that property.</p> | <p>B.15-2</p> |
| <ul style="list-style-type: none"> <p>◦ Page 3.4-20, Biological Resources; Conservation Element: The City's use of the "Cowardin" definition of a wetland is overly burdensome when applied to small, isolated, remnant, degraded " wetlands" where the requirement is the presence of just one of the three wetland criteria is sufficient to classify an area as a wetland (indicator species, duration of held water and hydric soils). Additionally, a non-flexible 100-foot buffer is also overly burdensome and does not consider specific issues for individual properties. On-site mitigation at reasonable ratio (i.e., 3:1) should be integrated into the C.E. policies and impact/mitigation assessments. Finally, such a rigid interpretation would likely result in dramatic impacts to the ability for the City to provide its required and needed housing opportunities.</p> | <p>B.15-3</p> <p>B.15-4</p> <p>B.15-5</p> <p>B.15-6</p> |
| <ul style="list-style-type: none"> <p>◦ Page 3.4-24a, Biological Resources; Figure 3.4-3 (Environmentally Sensitive Habitat Areas): The Cabrillo Business Park property is shown to have a larger area of ESHA than shown in site specific evaluations for that property.</p> | <p>B.15-7</p> |
| <ul style="list-style-type: none"> <p>◦ Page 3.6-4a, Geology, Soils, and Mineral Resources; Figure 3.6-2 (Fault Map): Please provide a note that the presence of an unnamed Inactive Fault inferred to run diagonally through Hollister Avenue, between Santa Felicia Drive and Los Carneros Road does not pose any constraint to future development in this area.</p> | <p>B.15-8</p> |
| <ul style="list-style-type: none"> <p>◦ Page 3.7-2a, Hazards and Hazardous Materials; Figure 3.7-1 (Hazards and Hazardous Materials): The Cabrillo Business Park property is shown to have a larger cone than shown in site specific evaluations for that property.</p> | <p>B.15-9</p> |
| <ul style="list-style-type: none"> <p>◦ Page 3.10-8a, Land Use and Recreation; Figure 3.10-3 (Existing and Planned Parks): What does the "E" next mean on this map. There should be an index that describes what is referenced by the capital letters on this map.</p> | <p>B.15-10</p> |
| <ul style="list-style-type: none"> <p>◦ Page 3.10-16a, Land Use and Recreation; Figure 3.10-4 (Proposed Land Use Map): The Cabrillo Business Park property is shown to have a larger cone for the "Services" designation than shown in site specific evaluations for that property.</p> | <p>B.15-11</p> |
| <ul style="list-style-type: none"> <p>◦ Page 5.14, Alternatives to the Proposed Projects; Land Use and Recreation: Be specific as to what density reductions for each of the 22 sites for both 5.4.10.2 and 5.4.10.3.</p> | <p>B.15-12</p> |

This completes our comments on the Draft EIR. Should you have any questions regarding our comments, please don't hesitate to give me a call at (805) 963-0651, ext. 21. I may also be e-mailed at kmarshall@dudek.com.

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July 18, 2006
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Sincerely,
DUDEK & Associates, Inc.



Kenneth E. Marshall, AICP
Principal Planner

cc: Russ Goodman
Peter Brown

Response to Comment No. B.15-1

The commentator asks what visual impacts are anticipated from development of Sites 77 and 78. Site 77 is a thin strip of vacant land located along the north side of Los Carneros Road, north of Hollister Avenue. Site 78 is a vacant parcel located south of Hollister Avenue and west of Los Carneros Road. Visual impacts to Site 77 are discussed under Impacts 3.1-1a, 3.1-3a, and 3.1-3c in the DEIR, and would principally affect southerly views from US-101, and views from selected public areas within the City. Similarly, visual impacts to Site 78 would also affect southerly views from US-101, Hollister Avenue, and from selected public areas within the City. The specific visual impacts from future development of Site 77 and 78 are dependent upon project-specific features such as the future project location, mass, height, and design. These issues would be addressed in a future project-specific CEQA document, rather than in this programmatic-level GP/CLUP EIR

Response to Comment No. B.15-2

The commentator has requested clarification regarding the area of Cabrillo Business Park on Figures 3.4-1 and 3.4-2. As indicated in the introduction to EIR Section 3.4 and on Figure 3.4-2, the map in the DEIR showing ESHA habitat types in the City was produced by merging three datasets: the 2004 aerial imagery interpretation conducted by Jones & Stokes in April through May 2006, the 2004 habitat mapping for the area covered by the Ellwood-Devereux Coast Open Space and Habitat Management Plan, and the map of designated ESHAs in the Conservation Element of the GP/CLUP. In EIR Figure 3.4-2, areas are identified as ESHAs if they meet the ESHA definition in Policy CE 1-2, are identified in Policy CE 1-3 as a designated ESHA, or are listed as an ESHA on Table 4-2 in the GP/CLUP.

In response to comments on both the EIR and GP/CLUP, the City has revised the EIR and GP/CLUP maps showing ESHAs and special status species. The revised maps are now consistent with one another. See response to comment B.1-3 for map revision details.

Response to Comment No. B.15-3

The commentator states the opinion that the City's use of the "Cowardin" definition of a wetland is overly burdensome when applied to small, isolated, remnant, degraded "wetlands," where the requirement is that the presence of just one of the three wetland criteria is sufficient to classify an area as a wetland.

Response to Comment No. B.15-4

The commentator states the opinion that a non-flexible 100-foot buffer is overly burdensome and does not consider specific issues for individual properties. The commentator's opinion is noted. The 100-foot buffer is consistent with the Coastal Commission setback and City staff believe that that a consistent buffer in both the inland and coastal areas is a reasonable approach to resource management.

Response to Comment No. B.15-5

The commentator suggests that onsite mitigation at a reasonable ratio (i.e., 3:1) should be integrated into the Conservation Element policies and impact/mitigation assessments.

Response to Comment No. B.15-6

The commentator expresses an opinion that a rigid interpretation of Conservation Element policies would likely result in dramatic impacts to the City's ability to provide its required and needed housing opportunities.

See response to comment B.8-50. Various policy subsections in the Conservation Element allow flexibility in applying ESHA standards in specific circumstances.

Response to Comment No. B.15-7

See response to comment B.15-2.

Response to Comment No. B.15-9

The commentator states that Figure 3.7-1 shows a "larger cone" for the Cabrillo Business Park than shown in site-specific evaluations for that property. The comment regarding the "cone" likely pertains to the Airport Hazard Areas, including the Clear Zone and the Approach Zone. As indicated on the figure in question, the depiction of the Airport Hazards Areas in Figure 3.7-1 is based on data presented in the Santa Barbara County Airport Land Use Plan. The specific data layer presented in Figure 3.7-1 was provided by staff of the Santa Barbara Airport and is believed to be accurate. Also, see response to comment A.3-2.

Response to Comment No. B.15-10

The commentator has asked for clarification regarding the significance of the letter "E" on Figure 3.10-3. Letter E in Figure 3.10-3 corresponds to the map identification letters in the first column of Table 3.10-3. Figure 3.10-3 includes a note in the legend that states "refer to Table 3.10-3 for future park site name by identification letter."

Response to Comment No. B.15-11

The Commentator is incorrect in stating that the Cabrillo Business Park property is shown to have a larger cone for the "Services" designation than shown in site-specific evaluation for that property. The property has the same cone or "Services" designation boundary as shown in previous site-specific evaluations.

Response to Comment No. B.15-12

See response to comment B.13-2.

B-16

DUDEK

621 CHAPALA STREET
SANTA BARBARA, CALIFORNIA 93101
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July 18, 2006

Mr. Ken Curtis
Director of Planning & Environmental Services
Planning & Environmental Services Department
City of Goleta
130 Cremona Drive, Suite B
Goleta, California 93117

SUBJECT: City of Goleta, Draft General Plan / Coastal Land Use Plan (May 2006)
Draft Environmental Impact Report (DEIR)

Dear Mr. Curtis:

Thank you for the opportunity to comment on the above referenced Draft Environmental Impact Report (DEIR). Having reviewed the document, and have prepared the following comments:

- **Page ES-2, Executive Summary; Background:** It is stated that "For purposes of this EIR, the environmental setting (existing condition) is considered to be made up of those land uses and environmental conditions now physically existing as of the date of preparation of this document." However, since this is a Program EIR, in addition to determining the environmental setting (existing condition), the "baseline" must also be determined, which will then used to measure the proposed project (in this case the GP/CLUP) against the existing baseline. Since the City of Goleta did not adopt the County of Santa Barbara's Goleta Community Plan, the potential for build-out is driven by the City's Zoning Ordinance and Zoning designations. In this manner, the "baseline" includes the difference between the existing condition AND all under and undeveloped parcels. The resulting build-out potential is the baseline upon which the proposed GP/CLUP must be assessed, not the existing condition.
- **Page ES-4, Executive Summary; Growth-Inducing Impacts:**
 - What is the accurate number of potential new residential residences (3,370 or 3,730)? (Page ES-4 says 3,370 and Page 2-3 says 3,730). Did the DEIR use the correct number for impact evaluation?
- **Page 2-2, Objectives of the Draft General Plan / Coastal Land Use Plan:** According to these objectives, one of the fundamental goals of the GP/CLUP is to "provide a sustainable economy that is not dependent on growth, but provides for economic prosperity and well-being for current and future residents"; how does the City and this Plan propose to provide a sustainable economy that is not dependent on growth?

B.16-1

B.16-2

B.16-3

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- **Page 2-7, Project Description; Transportation Element (last bullet):** According to the DEIR, the Transportation Element proposes to set traffic LOS standards at LOS D for six intersections; however, the revised TE (revised on 7/11/06) says that only one intersection will remain at LOS D (Storke and Hollister). This is an example of the problem the City has created by publishing the DEIR before it had a stable project description, which denies the public’s fundamental right to have 45 days to comment on the actual project that is being proposed. This will no doubt necessitate recirculation of the DEIR with changes made to it, based upon the revisions to the project description.

B.16-4
- **Page 2-10, Project Description; Housing Element:** Regional Housing Needs Allocation (RHNA) numbers = 2,388 units (2001-2009)

B.16-5
- **Page 3-4, Environmental Setting, Impacts, and Mitigation; Evaluation:** It is stated that “cumulative impacts are evaluated by the plan approach within the City boundary, as described above under Method 2”; however, I could not find any reference to or definition of Method 2. What is the plan approach?

B.16-6
- **Page 3-4, Environmental Setting, Impacts, and Mitigation; Evaluation:** It is stated that “The growth and changes in land use that were analyzed as impacts of the project throughout the EIR were projected to the year 2030, employing a cumulative analysis methodology.” Please describe what is meant by employing a cumulative analysis methodology.
- **Page 3-8, Environmental Setting, Impacts, and Mitigation; Evaluation (Table 3-1):** I believe there are projects listed in the cumulative project table (i.e., Por La Mar / Caird Greenhouses with over 1.4 million square feet) that are no longer active. If there are such inactive projects, the cumulative list and therefore the cumulative impact assessment overstates the actual cumulative impacts.

B.16-7
- **Page 3-11, Environmental Setting, Impacts, & Mitigation; Evaluation (Table 3-1):** The DEIR categorizes the Absolute Mini-Storage project’ as “Built & Operational”. I believe the project is built & operational. If this is the case; why is this proeject included in the cumulative list? It should be considered part of the existing setting. Are there other projects are on this list (and evaluated in the cumulative analysis) that are already built & operational (and as such are already part of the baseline analysis)? If so, does mean there is a “double-counting” of impacts associated with these projects as they are part of the existing setting AND were counted as part of the cumulative assessment?
- **Page 3.1-5, Aesthetics & Visual Resources; Regulatory Framework (Local):** It is stated that “Development in the City is subject to the City’s Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone and the Coastal Zoning Ordinance for

B.16-8

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those portions of the City within the Coastal Zone. ...Existing City ordinances are not applicable in the context of this EIR because they will be replaced when the GP/CLUP is adopted." Since development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone, how can Existing City ordinances (i.e., City's Inland Zoning Ordinance) not be applicable in the context of this EIR? (Also please refer to comment above relating to Page ES-2, Executive Summary; Background).

B.16-8

- **Page 3.1-6, Aesthetics & Visual Resources; Project Impacts & Mitigation (Thresholds of Significance [Item 1b]):** It is stated that a project would have a potentially significant visual resource impact if a proposed project has the potential to degrade the site's existing visual resources. Won't any new development have the potential to degrade the site's existing visual resources? Therefore, any new development will have the potential to create a potentially significant visual resource impact. Additionally, the DEIR should include: (1) a recommended mitigation measure that would potentially reduce all aesthetic impacts to Class II; or (2) the EIR needs to provide a site by site analysis to support its contention that a residual Class I impacts would remain. Presently, there is absolutely no supporting data/analysis (photo simulations, etc.) has been provided to support EIR's assertion.
- **Page 3.1-8, Aesthetics & Visual Resources; Project Impacts & Mitigation (Project Impacts):**

 - Reference is made to Figures 3.1-1 and 3.10-2 relating to potential visual resource impacts. Figure 3.10-2 provides numbers of vacant sites (i.e., #117); but I could not find an index that explained what these sites were (i.e., APN, project owner name, address, etc). This is especially important because, starting on page 3.1-9, sites are referenced as having the potential for impacting visual resources.
- **Page 3.1-12, Aesthetics & Visual Resources; Project Impacts & Mitigation (Project Impact 3.1-2b):** Please utilize site numbers when referencing potential visual impacts (see discussion above).
- **Page 3-2.1, Agriculture & Farmland; Existing Conditions:** Just because a site is zoned Agriculture (AG) - doesn't make it Agriculture. Numerous factors must be considered before designating a property Agriculture, such as:

 - parcel size
 - adjacent land uses
 - water availability and cost
 - soil classification
 - agricultural suitability
 - combined farming opportunities
 - agricultural preserve potential, etc

B.16-9

B.16-10

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There is a larger issue here, which is that DEIR concludes that properties are agriculturally significant without thoroughly evaluating the above factors which are part of the City's CEQA thresholds (which were originally part of the County's thresholds), that requires such analysis to make determination of significance.

- **Page 3.2-6, Agriculture & Farmland; Table 3.2-2):** For each site, (under soil type) provide the number of acres that are considered prime soils (Class I & II). Also under each site, provide an explanation of how the farmland classifications were made. B.16-10
- **Page 3.2-13, Agriculture & Farmland; Long-Term Impacts:** Describe what amounts of Prime Farmland, Unique farmland, etc. are attributable to each site.
- **Page 3.2-14, Agriculture & Farmland; Table 3.2-2):** For each site, (under Prime Soils [Acres]) "Impacts" provide the number of acres of prime soils (Class I & II) and define how impacts were assessed.
- **Page 3.4-17, Biological Resources; Regulatory Framework (Local):** It is stated that "Development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone and the Coastal Zoning Ordinance for those portions of the City within the Coastal Zone. ... Existing City ordinances are not applicable in the context of this EIR because they will be replaced when the GP/CLUP is adopted." Since development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone, how can Existing City ordinances (i.e., City's Inland Zoning Ordinance) not be applicable in the context of this EIR? (Also please refer to comment above relating to Page ES-2, Executive Summary; Background). Also, please refer to comments made on page 3.10-2). Finally, since most vacant parcels proposed for housing will have tire ruts and other non-natural conditions, these features may collect water and then be classified as wetlands, and thus be subject to the 100' buffer requirement. The EIR must assess the impact of this on the City's ability to meet its RHNA allocation, as required by law; this analysis must be specific, not just generalization. The City must show how/why the 100' buffer requirement is feasible (i.e., will have no impact on required production of housing per RHNA). B.16-11
- **Page 3.4-20, Biological Resources; Conservation Element:** The City's use of the "Cowardin" definition of a wetland is overly burdensome when applied to small, isolated, remnant, degraded " wetlands" where the requirement is the presence of just one of the three wetland criteria is sufficient to classify an area as a wetland (indicator species, duration of held water and hydric soils). Additionally, a non-flexible 100-foot buffer is also overly burdensome and does not consider specific issues for individual properties. On-site mitigation at reasonable ratio (i.e., 3:1) should be integrated into the C.E. policies and impact/mitigation assessments. Finally, such a rigid interpretation would likely B.16-12
- **Page 3.4-20, Biological Resources; Conservation Element:** The City's use of the "Cowardin" definition of a wetland is overly burdensome when applied to small, isolated, remnant, degraded " wetlands" where the requirement is the presence of just one of the three wetland criteria is sufficient to classify an area as a wetland (indicator species, duration of held water and hydric soils). Additionally, a non-flexible 100-foot buffer is also overly burdensome and does not consider specific issues for individual properties. On-site mitigation at reasonable ratio (i.e., 3:1) should be integrated into the C.E. policies and impact/mitigation assessments. Finally, such a rigid interpretation would likely B.16-13
- **Page 3.4-20, Biological Resources; Conservation Element:** The City's use of the "Cowardin" definition of a wetland is overly burdensome when applied to small, isolated, remnant, degraded " wetlands" where the requirement is the presence of just one of the three wetland criteria is sufficient to classify an area as a wetland (indicator species, duration of held water and hydric soils). Additionally, a non-flexible 100-foot buffer is also overly burdensome and does not consider specific issues for individual properties. On-site mitigation at reasonable ratio (i.e., 3:1) should be integrated into the C.E. policies and impact/mitigation assessments. Finally, such a rigid interpretation would likely B.16-14
- **Page 3.4-20, Biological Resources; Conservation Element:** The City's use of the "Cowardin" definition of a wetland is overly burdensome when applied to small, isolated, remnant, degraded " wetlands" where the requirement is the presence of just one of the three wetland criteria is sufficient to classify an area as a wetland (indicator species, duration of held water and hydric soils). Additionally, a non-flexible 100-foot buffer is also overly burdensome and does not consider specific issues for individual properties. On-site mitigation at reasonable ratio (i.e., 3:1) should be integrated into the C.E. policies and impact/mitigation assessments. Finally, such a rigid interpretation would likely B.16-15
- **Page 3.4-20, Biological Resources; Conservation Element:** The City's use of the "Cowardin" definition of a wetland is overly burdensome when applied to small, isolated, remnant, degraded " wetlands" where the requirement is the presence of just one of the three wetland criteria is sufficient to classify an area as a wetland (indicator species, duration of held water and hydric soils). Additionally, a non-flexible 100-foot buffer is also overly burdensome and does not consider specific issues for individual properties. On-site mitigation at reasonable ratio (i.e., 3:1) should be integrated into the C.E. policies and impact/mitigation assessments. Finally, such a rigid interpretation would likely B.16-16

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result in dramatic impacts to the ability for the City to provide its required and needed housing opportunities.

B.16-16

- **Page 3.8-16, Population and Housing; Relevant Discussion of GP/CLUP Policies (Project Impacts):** The existing jobs/housing ratio is 0.99; therefore, therefore it appears that there is an existing jobs/housing balance. According to the DEIR, with the Proposed GP there will be a jobs/housing ratio of 0.64 - 0.79. Does this mean that the GP needs to provide more jobs to create a balance? Please provide an explanation of this in the FEIR.
- **Page 3.8-18 Population and Housing; Relevant Discussion of GP/CLUP Policies (Project Impacts):** GGMO issues. As indicated above, there does not appear to be a current jobs/housing imbalance.

 - Pg. 3.8-3 says a resident worker/job ratio of 1:1 is balanced.
 - Pg. 3.8-16 (Table 3.8-7) says current jobs/resident worker = 0.99 (basically 1:1 [therefore balanced]).
 - The DEIR indicates that for every job = 0.7 workers; in this regard there would not enough resident workers. Please provide an explanation of this in the FEIR.
- **Page 3.9-11, Water Resources, Regulatory Framework (Local):** It is stated that "Development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone and the Coastal Zoning Ordinance for those portions of the City within the Coastal Zone. ...Existing City ordinances are not applicable in the context of this EIR because they will be replaced when the GP/CLUP is adopted." Since development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone, how can Existing City ordinances (i.e., City's Inland Zoning Ordinance) not be applicable in the context of this EIR? (Also please refer to comment above relating to Page ES-2, Executive Summary; Background).
- **Page 3.10-2, Land Use and Recreation, Existing Conditions (Land Use):** It is stated that "With the future adoption of the City's first GP/CLUP, the existing City zoning ordinances will have to be amended/ revised to ensure consistency with the adopted GP/CLUP. As such, existing land uses will serve as the environmental baseline instead of the traditional use of zoning designations". This wording is different than all other references to existing zoning (i.e., pages 3.1-5, 3.4-17, and 3.9-11). Please refer to comment above relating to Page ES-2, Executive Summary; Background.
- **Page 3.10-4a, Land Use and Recreation, Figure 3.10-2:** Figure 3.10-2 provides numbers of vacant sites (i.e., #117); but there is no index for these site references (i.e., APN, project owner name, address, etc). This is especially important because these sites are referenced as having the potential for impacts in various sections of this DEIR.

B.16-17

B.16-18

B.16-19

B.16-20

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- **Page 3.10-10, Land Use and Recreation; Regulatory Framework (Local):** It is stated that "Development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone and the Coastal Zoning Ordinance for those portions of the City within the Coastal Zone. ...Existing City ordinances are not applicable in the context of this EIR because they will be replaced when the GP/CLUP is adopted." Since development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone, how can Existing City ordinances (i.e., City's Inland Zoning Ordinance) not be applicable in the context of this EIR? (Also please refer to comment above relating to Page ES-2, Executive Summary; Background). **B.16-21**
- **Page 3.11-2a, Noise; Figure 3.11-1 (Existing 2005 Noise Contours-Roadways):** Noise monitoring stations are represented by numbers (i.e., 23); however, although mention is made in Table 3.11-4, there are no specific data for these monitoring stations (i.e., when measurements were taken, for how long, what were the results, etc.). Please provide results/conclusions regarding measurements for each location. Also, Figures 3.11-1 & 3.11-2 provide contours for "Existing Roadways" and "Existing Airport and Railroad" respectively; however, these three mobile noise sources (Roadways, Airport and Railroad) need to be evaluated as a composite mobile noise source; in this regard, Figures 3.11-1 & 3.11-2 need to be combined into one map. Without this information, the DEIR does not provide the data needed to support the DEIR's conclusion, and the public cannot tell on what basis EIR has reached its conclusion; therefore, the technical data must be provided within the EIR, and the public must have the 45-day opportunity to review the data so it can provide focused and specific comments. **B.16-22**
- **Page 3.11-4a, Noise; Figure 3.11-2 (Existing 2005 Noise Contours-Airports and Railroad):** See comments on page 3.11-2a. **B.16-23**
- **Page 3.11-10, Noise; Table 3.11-4:** See comments on page 3.11-2a. For example, for monitoring position # 23 Table 3.11-4 says 54.2 Leg, but Figure 3.11-1 says 60 dBA? **B.16-24**
- **Page 3.11-14, Noise; Local (City of Goleta Ordinances):** It is stated that "Development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone and the Coastal Zoning Ordinance for those portions of the City within the Coastal Zone. ...Existing City ordinances are not applicable in the context of this EIR because they will be replaced when the GP/CLUP is adopted." Since development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone, how can Existing City ordinances (i.e., City's Inland Zoning Ordinance) not be applicable in the context of this EIR? (Also please refer to comment above relating to Page ES-2, Executive Summary; Background). **B.16-25**
- **Page 3.11-14, Noise; Local (City of Goleta Ordinances):** It is stated that "Development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone and the Coastal Zoning Ordinance for those portions of the City within the Coastal Zone. ...Existing City ordinances are not applicable in the context of this EIR because they will be replaced when the GP/CLUP is adopted." Since development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone, how can Existing City ordinances (i.e., City's Inland Zoning Ordinance) not be applicable in the context of this EIR? (Also please refer to comment above relating to Page ES-2, Executive Summary; Background). **B.16-26**

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| <ul style="list-style-type: none"> • Page 3.11-15, Noise; Project Impacts and Mitigation: “a” indicates that 65dBA CNEL is the threshold for exterior noise levels; however, Policy NE 1.2 (in the Noise Element) states that 60 CNEL is the threshold for exterior noise levels for residential uses? | <p>B.16-27</p> |
| <ul style="list-style-type: none"> • Page 3.11-18a, Noise; Figure 3.11-3 [Future Noise Contours-Roadways (2030)]: This Figure needs to be combined with Figure 3.11-4 (refer to similar comments on page 3.11-2a). | <p>B.16-28</p> |
| <ul style="list-style-type: none"> • Page 3.11-20a, Noise; Figure 3.11-4 [Future Noise Contours-Airport (2025) and Railroad (2030)]: This Figure needs to be combined with Figure 3.11-3 (refer to similar comments on page 3.11-2a). | <p>B.16-29</p> |
| <ul style="list-style-type: none"> • Page 3.12-8, Public Services and Utilities; Regulatory Framework (Local): It is stated that “Development in the City is subject to the City’s Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone and the Coastal Zoning Ordinance for those portions of the City within the Coastal Zone. ...Existing City ordinances are not applicable in the context of this EIR because they will be replaced when the GP/CLUP is adopted.” Since development in the City is subject to the City’s Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone, how can Existing City ordinances (i.e., City’s Inland Zoning Ordinance) not be applicable in the context of this EIR? (Also please refer to comment above relating to Page ES-2, Executive Summary; Background). | <p>B.16-30</p> |
| <ul style="list-style-type: none"> • Page 3.13-1, Transportation and Circulation; Existing Conditions: . The Transportation Element is fundamental to City’s ability to mitigate impacts of Land Use Element buildout. Substantial changes have been made to Transportation Element since publication of EIR, including adding new policies concerning roadways (i.e., numerous changes to the Draft Transportation Element were made at the 7/11/06 Planning Agency/City Council evening hearing). The public has right to review the EIR’s analysis of the final Transportation Element and then comment on that. | <p>B.16-31</p> |
| <ul style="list-style-type: none"> • Page 3.13-3, Transportation and Circulation; Existing Conditions (Table 3.13-2): Why are some counts 2003 vs. 2005? | <p>B.16-32</p> |
| <ul style="list-style-type: none"> • Page 3.13-4, Transportation and Circulation; Existing Conditions (Table 3.13-3): See comments on page 2-7. The DEIR is inconsistent with the Transportation Element that was recently recommended for approved by City Council. This demonstrates the problems created when EIR is prepared before the project has been defined. | <p>B.16-33</p> |
| <ul style="list-style-type: none"> • Page 3.13-9, Transportation and Circulation; Regulatory Framework (Local): It is stated that “Development in the City is subject to the City’s Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone and the Coastal Zoning Ordinance for | <p>B.16-33</p> |

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those portions of the City within the Coastal Zone. ...Existing City ordinances are not applicable in the context of this EIR because state law requires the zoning code to be amended to be consistent with the GP/CLUP..." Since development in the City is subject to the City's Inland Zoning Ordinance for those portions of the City outside of the Coastal Zone, how can Existing City ordinances (i.e., City's Inland Zoning Ordinance) not be applicable in the context of this EIR? (Also please refer to comment above relating to Page ES-2, Executive Summary; Background).

B.16-33

- **Page 3.13-9, Transportation and Circulation; Thresholds of Significance (City of Goleta LOS Standard):** See comments on page 2-7. The DEIR is inconsistent with the Transportation Element that was recently recommended for approved by City Council. This demonstrates the problems created when EIR is prepared before the project has been defined.

B.16-34

- **Page 3.13-19, Transportation and Circulation; Regulatory Framework (Results of Traffic Analysis):** See comments on page 2-7. The DEIR is inconsistent with the Transportation Element that was recently recommended for approved by City Council. This demonstrates the problems created when EIR is prepared before the project has been defined.

- **Page 3.13-23, Transportation and Circulation; (Table 3.13-11):** Two new "overcrossings" are discussed in this table (Ellwood Station Overcrossing and La Patera Overcrossing). From Figure 3.13-5, it appears that the two overcrossings would generally align with an existing developed ROW. However, neither this DEIR nor the GP/CLUP Transportation Element provide any specific details as to the actual development of these overcrossings (i.e., specifically where they would be located, how big they would be, how they hook into the existing roadways, is there a need for hook-ramps or other similar features, etc.). Without these details, it is impossible to determine the environmental impacts of these features. CEQA Section 15126.4(a)(1)(D) requires a review of mitigation measures (such as these overcrossings) to be discussed if the mitigation measures themselves could cause one or more significant effects. Therefore, the details of these mitigation measures (the two overcrossings) must be provided in order to determine if they could create significant impacts (i.e., could the construction of the La Patera Overcrossing create impacts to ESHA associated with Lake Los Carneros). Please ensure that the EIR addresses these issues.

B.16-35

- **Page 3.13-24, Transportation and Circulation; Results of Traffic Analysis (Table 3.13-12):** A column should be added to this table indicating what the residual LOS would be for each of the intersections, once recommended improvements were implemented.

B.16-36

- **Page 3.13-28, Transportation and Circulation; Results of Traffic Analysis (Table 3.13-14):** See comments on page 2-7. The DEIR is inconsistent with the Transportation Element that was recently recommended for approved by City Council. This demonstrates the

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problems created when EIR is prepared before the project has been defined. Additionally, the 2 proposed non-interchange overpasses are unfunded, unplanned, and have had no analysis of engineering or environmental feasibility (i.e., it appears that the La Patera overpass appears to start north of the freeway right in the middle of ESHA at Lake Los Carneros. The EIR must perform baseline environmental analysis of potential impacts of these overpasses' construction. Additionally, the EIR must analyze impacts caused by buildout of the GP/CLUP without construction of these overpasses, since City Council has acknowledged that it will probably take 20 years to build them and it will certainly be the case that much of the buildout could occur without these interchanges. Tables must be revised to show LOS at the listed intersections in this near to mid-term condition.

B.16-37

B.16-38

B.16-39

- Page 5-3, Alternatives to the Proposed Project; Alternatives Analyzed in the EIR (Table 5-1): This table indicates that the "No Project" Alternative would result in 356 residential units and 268,000 square feet of commercial/industrial sq.ft. What are these numbers based upon? The FEIR must provide data that went into the creation of these conclusions. Page ES-2, Executive Summary; Background states "For purposes of this EIR, the environmental setting (existing condition) is considered to be made up of those land uses and environmental conditions now physically existing as of the date of preparation of this document." If this is the case, the No Project should result in no additional residential units and no additional commercial/industrial sq. ft.. However, as indicated in our comments on page ES-2, the "No Project" Alternative should actually result in the number of residential units and the amount of commercial/industrial sq. ft. that could be developed on all under and undeveloped parcels, based upon allowances in the existing City's Zoning designations. What amount of development could be developed on all under and undeveloped parcels, based upon existing Zoning designations?

B.16-40

B.16-41

Additionally, Table 5-1 indicates that Alternative 1 would result in 3,030 residential units and 1,215,000 square feet of commercial/industrial sq. ft. and that Alternative 2 would result in 2,270 residential units and 1,111,000 square feet of commercial/industrial sq. ft. The anticipated changes to the build-out of residential units and commercial/industrial sq. ft. for each of these two alternatives (compared to the proposed GP/CLUP) must detail the reduction anticipated for each parcel of land in the City (i.e., number of residential units anticipated in the GP/CLUP for a specific parcel and the commensurate reduction for both Alternatives; 1 and 2). This must be provided to enable the accurate assessment of impacts associated with each alternative (when compared to the proposed GP/CLUP) for example "Traffic". Without the specific reduction anticipated for each parcel for each alternative, there would not be any way to assess the impact reductions (i.e., traffic). Therefore, please provide these reduction assumptions for each parcel. This may necessitate re-circulation of the DEIR, once individual property owner realize the potential implications it would have on their properties.

B.16-42

B.16-43

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- **Page 5-4, Alternatives to the Proposed Project; Alternatives 1 and 2:** How were these alternatives chosen? The specific alternatives don't seem to mitigate Class I impacts attributable to the proposed GP/CLUP. B.16-44
- **Page 5-4, Alternatives to the Proposed Project; Alternatives Impact Summary (No Project):** It is stated that "Under the No Project alternative, the City would continue to function under the direction of the existing adopted interim policies such as the Inland and Coastal Zoning Ordinances, and Coastal Act policies". This is contrary to the remainder of the DEIR (i.e., see comment above on page 5-3 that says that the "No Project" Alternative would result in 356 residential units and 268,000 square feet of commercial/industrial sq. ft.). Obviously, there could be considerably more build-out under the direction of the existing adopted interim policies such as the Inland and Coastal Zoning Ordinances. This is precisely what we have been commenting on (starting on page ES-2 (Executive Summary; Background). In this regard, it appears that all "existing condition" and No Project Alternative discussions in the DEIR will need to be revised, which will no doubt necessitate re-circulation of the DEIR. B.16-45
- **Page 5-4, Alternatives to the Proposed Project; Alternatives Impact Summary (No Project):** A statement is made here that "The No Project alternative would accommodate an additional 1,028 housing units" however, page 5-3 (table 5-1) states that The No Project alternative would result in 356 residential units? Does this mean that all alternative comparisons are incorrect? B.16-46
- **Page 5-4, Alternatives to the Proposed Project; Alternatives Impact Summary (No Project):** A statement is made here that "The No Project alternative would accommodate an additional 1,028 housing units" however, page 5-3 (table 5-1) states that The No Project alternative would result in 356 residential units? Does this mean that all alternative comparisons are incorrect? B.16-47
- **Page 5-4b, Alternatives to the Proposed Project; Figure 5-2 (Land Use Plan Alternative 1-Reduced Development):**

 - As indicated in our comments on page 5-3, Figure 5-2 must also describe the specific anticipated changes to the build-out of residential units and commercial/industrial sq. ft. for Alternative 1 (compared to the proposed GP/CLUP) for each parcel indicated on this figure where residential densities and FAR's are proposed to be reduced. Additionally, the EIR must demonstrate how the alternatives will insure that the City meets its RHNA housing allocation. This must be demonstrated because any alternative that does not accomplish this is per se infeasible since it does not comply with law. Finally, substantial testimony has already been provided to City that its 55% affordable requirement is economically infeasible. The State of California itself has said this (HCD). Given that fact, the EIR needs to demonstrate that this mitigation measure is feasible before adopting it. B.16-48
- **Page 5-4c, Alternatives to the Proposed Project; Figure 5-3 (Land Use Plan Alternative 2-Reduced Development):**

 - As indicated in our comments on page 5-3, Figure 5-3 must also describe the specific anticipated changes to the build-out of residential units and commercial/industrial sq. ft. for Alternative 2 (compared to the proposed B.16-49
- **Page 5-4c, Alternatives to the Proposed Project; Figure 5-3 (Land Use Plan Alternative 2-Reduced Development):**

 - As indicated in our comments on page 5-3, Figure 5-3 must also describe the specific anticipated changes to the build-out of residential units and commercial/industrial sq. ft. for Alternative 2 (compared to the proposed B.16-50
- **Page 5-4c, Alternatives to the Proposed Project; Figure 5-3 (Land Use Plan Alternative 2-Reduced Development):**

 - As indicated in our comments on page 5-3, Figure 5-3 must also describe the specific anticipated changes to the build-out of residential units and commercial/industrial sq. ft. for Alternative 2 (compared to the proposed B.16-51

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GP/CLUP) for each parcel indicated on this figure where residential densities and FAR's are proposed to be reduced.

B.16-51

- **Page 5-6, Alternatives to the Proposed Projects; Air Quality (No Project):** A statement is made that "While no new development would be permitted under this alternative, there may be short-term air impacts from the construction of projects already permitted or approved but not constructed." This runs contrary to assumptions made regarding the "No Project Alternative" on page 5-3 that says there will be 356 residential units and 268,000 square feet of commercial/industrial sq. ft under the "No Project Alternative"; and on page 5-4 that says there will be 1028 housing units? See additional comments on page 5-4 and on page ES-2.

B.16-52

B.16-53

- **Page 5-8, Alternatives to the Proposed Projects; Biological Resources:** See comments above regarding no new development under the "No Project "Alternative and on page ES-2.
- **Page 5-8, Alternatives to the Proposed Projects; Cultural Resources:** See comments above regarding no new development under the "No Project "Alternative and on page ES-2.
- **Page 5-9, Alternatives to the Proposed Projects; Geology, Soils, and Mineral Resources:** See comments above regarding the definition of the "No Project "Alternative and on page ES-2.
- **Page 5-10, Alternatives to the Proposed Projects; Hazards and Hazardous Materials:** No See comments above regarding the definition of the "No Project "Alternative and on page ES-2.

B.16-54

- **Page 5.12, Alternatives to the Proposed Projects; Population and Housing (No Project):** Refer to comments on previous pages regarding inconsistencies for Alternative 1 (356 residential units vs. 1028 units [page 5-3 vs. page 5-4]) etc.

B.16-55

- **Page 5.14, Alternatives to the Proposed Projects; Land Use and Recreation (No Project):** Refer to comments on previous pages regarding inconsistencies for Alternative 1 (356 residential units vs. 1028 units [page 5-3 vs. page 5-4]) etc.

- **Page 5.14, Alternatives to the Proposed Projects; Land Use and Recreation:** Be specific as to what density reductions for each of the 22 sites for both 5.4.10.2 and 5.4.10.3. Please see comments on page 5-3.

B.16-56

- **Page 5.15, Alternatives to the Proposed Projects; Noise:** See comments above regarding the definition of the "No Project "Alternative and on page ES-2.

B.16-57

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- **Page 5.17, Alternatives to the Proposed Projects; Transportation and Circulation (Table 3.13-7):** See comments above regarding the definition of the “No Project “ Alternative and on page ES-2; also add existing GTIP as part of the No Project, Intersection LOS 2030, as the existing Ordinances apply in the No Project Alternative. B.16-58
B.16-59
- **Page 5.21, Alternatives to the Proposed Project (Recommended Policy Revision to LOS Standard):** If it is recommended that the Storke/Hollister intersection be subject to a standard of LOS D, why is it that the Storke/Hollister intersection would remain significant and unavoidable (Class I)? Additionally, the EIR must require an implementation measure requiring the City to amend its CEQA Thresholds to specifically provide that the threshold of significance for traffic at Storke/Hollister will be 0.90v/c, rather than the current 0.80 – otherwise, a much more aggravated significant impact will develop at Storke/Hollister earlier in the buildout of the GP/CLUP. B.16-60
- **Page 5.21, Alternatives to the Proposed Project; Environmentally Superior Alternative:** As indicated throughout our comment letter, the No Project Alternative should not be considered the “existing conditions”. Rather, since this is a Program EIR, the No Project Alternative should be what can happen with current (existing) policies (i.e., zoning). Also please refer to our comments above regarding the definition of the “No Project “ Alternative and our comments on page ES-2. When the No Project is evaluated correctly (what can happen with existing policies [i.e., zoning] it is highly unlikely that it would be considered the Environmentally Superior Alternative). B.16-61
- **Page 5.22, Alternatives to the Proposed Projects; Environmentally Superior Alternative:** How can Alternative 2 be considered the Environmentally Superior Alternative when it does not meet the Basic Objectives of the Applicant (the City of Goleta); refer to page ES-2 (enables income group opportunities to meet current and future housing needs). B.16-62

RHNA	2,388 residential units
Alternative 2	2,270 residential units which is 118 units less the RHNA requirement
- **Page 6-4, Other CEQA Considerations; Evaluation: It is stated that “The GP/CLUP would allow for the development of 3,370 new residential units.”** However, the number should be 3,730 not 3,370. It is further stated that “This is a direct form of growth inducement. The number of units would accommodate about 7,421 new residents in the City.” However, the number should be 8,206 not 7,421. B.16-63

This completes our comments on the Draft EIR. Should you have any questions regarding our comments, please don't hesitate to give me a call at (805) 963-0651, ext. 21. I may also be e-mailed at kmarshall@dudek.com.

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Sincerely,
DUDEK & Associates, Inc.



Kenneth E. Marshall, AICP
Principal Planner

Response to Comment No. B.16-1

The commentator has requested clarification of the definition of baseline conditions in the EIR. The baseline for purposes of the EIR analysis includes the existing physical land uses as they existed at the time the Notice of Preparation was filed. CEQA Section 15125 (a) states:

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

There is no requirement in CEQA that requires that a project consider the existing zoning ordinance or zoning regulations as the baseline or existing setting. As noted above, the baseline condition for evaluating environmental impacts in the DEIR is the existing physical land use. This is noted in Section 2.2.2 of the DEIR, which states:

For purposes of this EIR, the environmental setting (existing condition) is considered to be made up of those land uses and environmental conditions now physically existing as of the date of preparation of this document.

Response to Comment No. B.16-2

Refer to response to comment B.9-2.

Response to Comment No. B.16-3

The commentator asks how the GP/CLUP can achieve one of its stated objectives, which is to “provide a sustainable economy that is not dependent on growth....” The comment pertains to the GP/CLUP rather than the DEIR. The intent of the objective is to note that one of the fundamental goals of the GP/CLUP is to provide a sustainable economy that is not solely dependent on growth. This clarification has been made to the FEIR.

Response to Comment No. B.16-4

See response to comment B.4-11.

Response to Comment No. B.16-5

The commentator has observed that the RHNA numbers for 2001–2009 are 2,388 units. Comment noted.

Response to Comment No. B.16-6

See response to comment B.8-3.

Response to Comment No. B.16-7

Table 3-1 has been updated.

Response to Comment No. B.16-8

The commentator asks for clarification in DEIR Section 3.1.2.2 (under City of Goleta Ordinances), that states that “Existing City ordinances are not applicable in the context of this EIR...”

This text has been clarified to say “Existing City zoning ordinances....” The existing zoning ordinances are not applicable because, by law, they will be prepared following adoption of the GP/CLUP.

Response to Comment No. B.16-9

The commentator asks whether any new development would have the potential to degrade a site’s existing visual resources. The commentator also requests that the EIR include a recommended mitigation measure to reduce all aesthetic impacts to Class II and that the EIR provide a site-by-site analysis supporting its contention that a Class I aesthetic impact would remain.

Future development of a site should not be assumed to have an inherently negative or beneficial impact to aesthetics and visual resources. The significance of visual impacts depends upon the characteristics of the development (e.g., its type, nature, location, extent, and design) as well as surrounding land uses. Due to the site-specific nature of visual impact assessment, it is not reasonable to propose a universal mitigation measure to reduce all aesthetic impacts to Class II, nor to provide a site-by-site analysis in a program-level document such as this GP/CLUP EIR.

Response to Comment No. B.16-10

The commentator disagrees with the agriculture land use designation criteria in Section 3.2.1. The term *agriculture* is defined in Section 3.2 of the EIR. The definition includes more factors than just the previous zoning, as the commentator alludes, and the City directs the commentator to the EIR for a complete review of the criteria used to identify existing agriculture sites. To paraphrase, the definition includes factors such as previous zoning, sites that are or were used for agricultural production, and/ or sites with soils or other characteristics that make them suitable for agricultural activities.

The commentator also requests that Table 3.2-2 and Table 3.2-3 provide the number of acres of prime soils and important farmland. The tables are revised to include the acreage of important farmland types. The commentator also requests that the impact assessment list the acreage of important farmland types. The acreages are included in the FEIR text and tables. These revisions do not alter the conclusions of the EIR.

Response to Comment No. B.16-11

The commentator has made remarks regarding GP/CLUP policies. No response is required.

Response to Comment No. B.16-12

See response to comment B.16-11. Regarding the feasibility of the buffer requirements, as stated in EIR Section 3.4.3.3, the EIR considers potential impacts to biological resources in terms of habitat impacts, species impacts, impacts to wildlife linkages, impacts to existing

preserves and approved conservation programs, and cumulative and residual impacts. Impacts and mitigation are considered on a program-level, which is the appropriate approach under CEQA for analysis of a regulatory plan or program. Consistent with the description of program EIRs in CEQA Guidelines [Section 15168], the EIR analysis of biological impacts treats the GP/CLUP policies as measures that reduce buildout-related impacts. On a program-level, all of the measures are technically feasible. The EIR does not and is not intended to provide a project-level analysis of impacts and mitigation.

Response to Comment No. B.16-13

See response to comments B.16-11 and B.16-12.

Response to Comment No. B.16-14

See response to comment B.16-11 and B.16-12.

Response to Comment No. B.16-15

The commentator has requested mitigation at “reasonable ratio” to be included in GP/CLUP policies. The policies identified in the Conservation Element of the GP/CLUP do not preclude the City from adopting impact mitigation ratios for all projects in its jurisdiction or from considering the ratio of mitigation to impacts in its decisions on individual projects. In addition, nothing in the GP/CLUP policies would allow unmitigated impacts to habitats regulated by the U.S. Army Corps of Engineers (i.e., wetlands) or California Department of Fish and Game (i.e., riparian areas and streambeds). If the GP/CLUP policies were revised to specify mitigation ratios for ESHA impacts, the potential for residual significant impacts potentially would be further reduced. No revisions to the analysis and findings in the EIR would be required under CEQA because the potential impacts would be less, not greater, than analyzed in the DEIR.

Response to Comment No. B.16-16

See response to comment B.16-11, B.16-12, and B.16-15.

Response to Comment No. B.16-17

See response to comments B.4-34 and B.4-35.

Response to Comment No. B.16-18

The commentator has requested clarification regarding the applicability of existing City ordinances in mitigating impacts. The Regulatory Setting described in this EIR is consistent with current governing regulation. Because the GP/CLUP has not yet been adopted, the current local regulation is the City’s Coastal Zoning Ordinance for those portions of the City within the Coastal Zone, and the City’s Inland Zoning Ordinances for other portions of the City. However, once the GP/CLUP has been adopted, the existing Inland and Coastal Zoning Ordinances will be replaced by a single, unified zoning code that includes zoning regulations applicable to inland areas and the coastal zone. Therefore, the existing City ordinances are indeed not applicable in the context of the EIR because they would no longer be current at the time of implementation of the GP/CLUP.

Response to Comment No. B.16-19

The commentator has correctly observed that the discussion of existing zoning on page 3.10-2 of the EIR is inconsistent with the rest of the EIR. This text has been modified to be consistent with the other existing zoning references in the EIR.

Response to Comment No. B.16-20

Refer to response to comment B.13-1.

Response to Comment No. B.16-21

Refer to response to comment B.16-1.

Response to Comment No. B.16-22

The commentator has requested the results and conclusions regarding noise measurements for each location. Information on the noise monitoring conducted is discussed in EIR section 3.11.1.2.

Response to Comment No. B.16-23

The commentator has requested that Figures 3.11-1 and 3.11-2 be combined into one figure. The purpose of the noise contour maps is to provide a general guide for development based on the applicable noise standard. They do not constitute hard and fast lines but rather provide a general indication as to where the limits of specified noise levels occur. Although it is technically possible to combine noise contours from various sources, little additional useful information would come from this in terms of identifying generalized noise exposure in the City. The contour maps as provided in the EIR are considered to provide a reasonable and adequate representation of noise conditions in the City.

Response to Comment No. B.16-24

See response to comment B.16-23. In addition, the noise contours provided in the EIR provide a reasonable adequate representation of noise conditions in the City. Data and information provided in the EIR are therefore considered to provide reasonable support for conclusions presented in the EIR. Recirculation of the EIR is not required. See response to comment B.2-4.

Response to Comment No. B.16-25

See responses to comments B.16-22, B.16-23, and B.16-24. Contours presented in Figure 3.11-1 are projections of L_{dn} values based on computer-based modeling. It is not inconsistent for a short-term L_{eq} measurement to be lower than the predicted L_{dn} value in the same location.

Response to Comment No. B.16-26

The commentator requests clarification about the applicability of existing zoning ordinances in the contest of this EIR. As stated in EIR section 3.11.2.2, existing City ordinances are not applicable because they will be replaced upon the adoption of the GP/CLUP.

Response to Comment No. B.16-27

The commentator has requested clarification regarding an alleged discrepancy regarding dBA levels. The significance threshold identified under item a, which uses 65 dBA CNEL, is based on the current applicable noise standard. The new standard proposed as part of Policy subsection NE 1.2 is 60 dBA CNEL; accordingly, it would not be used as the basis for the significance threshold.

Response to Comment No. B.16-28

See response to comment B.16-23.

Response to Comment No. B.16-29

Refer to response to comment B.16-1.

Response to Comment No. B.16-30

See response to comment B.2-4.

Response to Comment No. B.16-31

The commentator asks why some intersection counts were taken in 2003 and others in 2005. The City conducts regular traffic counts at locations throughout the City. The most recent available traffic count at any given location is utilized for analysis. Since counts are conducted on a rotating basis, the most recent counts at different locations could have been taken during different years. Traffic counts that are less than 2 to 3 years old are generally considered to be acceptable and are consistent with Caltrans guidelines (see Comment No. A.5-1). The standard practice is to update any counts older than 2 to 3 years.

Response to Comment No. B.16-32

See response to comment B.2-4.

Response to Comment No. B.16-33

The commentator asks for clarification in DEIR Section 3.13.2.2 (under City of Goleta Ordinances), that states that “Existing City ordinances are not applicable in the context of this EIR...” This text has been clarified to say “Existing City zoning ordinances...” The existing zoning ordinances are not applicable because, by law, they are required to be amended so that they are consistent with the land use plan defined in the adopted GP/CLUP.

Response to Comment No. B.16-34

See response to comment B.2-4.

Response to Comment No. B.16-35

The commentator states that impacts of the proposed transportation mitigation projects should be addressed in the EIR. The analysis and level of detail presented to evaluate the potential environmental impacts identified in the EIR are consistent with the level of detail for a programmatic, General Plan policy document. The setting, impacts, and mitigation discussions

presented in the EIR are all, by definition, program level. PS&E-level detailed plans are not completed for planning level GP/CLUP analysis. Potential environmental impacts are addressed at a programmatic level. PS&E and project-specific environmental review at this level will be completed as part of future project implementation.

Response to Comment No. B.16-36

The commentator states that Table 3.13-12 should include an additional column that shows the projected LOS at each location after the recommended improvements are implemented. The commentator is directed to Table 3.13-13, where this information is provided.

Response to Comment No. B.16-37

See response to comment B.2-4.

Response to Comment No. B.16-38

The commentator states that engineering, environmental feasibility, and financing discussion should be provided for the two proposed freeway crossings. See response to comment B.16-35, regarding the engineering comment. See “Response to Lack of Environmental Analysis Comment” under response to comment B.4-56, regarding environmental analysis; and “Response to No Funding Analysis Comment” under response to comment B.4-56, regarding financing.

Response to Comment No. B.16-39

The commentator states that analysis should be provided for a near to mid-term year, rather than just the long-range planning year. See “Response to Timeframe and Class I Impacts Comment” under the response to comment B.4-56.

Response to Comment No. B.16-40

The commentator has questioned the source of housing values in Table 5-1. DEIR Section 5.3.1 defines the No Project Alternative as “the existing conditions plus the projects that had received planning approvals but were not completed prior to preparation of the Draft GP/CLUP.” The development quantities referenced by the commentator are composed of these projects.

Response to Comment No. B.16-41

See response to comment B.16-40.

Response to Comment No. B.16-42

The commentator has requested an analysis of anticipated changes for each parcel of land in the City. See response to comment B.2-3 (and others as referenced thereto) regarding the sufficiency of technical data and detail as presented in the DEIR. As a programmatic environmental document on the City’s GP/CLUP, the DEIR need not provide a parcel-level analysis as requested by the commentator. The degree of specificity and technical detail provided in the text of the DEIR is sufficient for the public to assess the project’s potential environmental impacts.

Response to Comment No. B.16-43

See response to comment B.2-4.

Response to Comment No. B.16-44

The commentator has asked for a description of how the alternatives were chosen. The rationale for selecting alternatives is presented in Section 5.1.2 of the DEIR. CEQA Guidelines Section 15126.6(c) requires only that the alternatives chosen for analysis feasibly accomplish *most* of the basic objectives of the project. The inability of either Alternative 1 or 2 to mitigate all Class I impacts attributable to the proposed GP/CLUP is not sufficient reason to dismiss these alternatives from evaluation in the DEIR.

Response to Comment No. B.16-45

The commentator alleges inconsistency within the DEIR regarding the No Project Alternative. DEIR Section 5.3.1 defines the No Project Alternative as “the existing conditions plus the projects that had received planning approvals but were not completed prior to preparation of the Draft GP/CLUP.” The development quantities referenced by the commentator are composed of these projects and are not at odds with interim policies such as the Inland and Coastal Zoning Ordinances and the Coastal Act policies.

Response to Comment No. B.16-46

See response to comment B.2-4.

Response to Comment No. B.16-47

The commentator expresses confusion over what scale of development is being analyzed under the No Project Alternative, specifically with respect to the number of housing units presented as buildout. See responses to comments B.6-26 and 27.

Response to Comment No. B.16-48

See response to comment B.16-42.

Response to Comment No. B.16-49

The commentator has requested the EIR demonstrate how the City will meet its RHNA allocation. The GP/CLUP project objectives are identified in Section 2.3 of the DEIR and do not include achievement of the City’s RHNA housing allocation. Accordingly, the DEIR need not demonstrate how its alternatives will ensure that the City meets its RHNA housing allocation. The GP/CLUP does satisfy the RHNA by designating a more-than-sufficient supply of vacant sites at appropriate residential densities. Housing Element law does not require the City to establish quantified objectives that will meet 100% of the RHNA through actual housing production during the RHNA period.

Response to Comment No. B.16-50

See response to comment B.4-45. The commentator alleges that the City’s inclusionary housing policy is economically infeasible but provides no evidence supporting that claim.

Response to Comment No. B.16-51

See responses to comments B.16-42 and 48.

Response to Comment No. B.16-52

The commentator expresses confusion over the number of additional housing units proposed under the No Project Alternative, and suggests that there are related inconsistencies in the Air Quality section. See responses to comments B.6-26 and B.6-27.

Response to Comment No. B.16-53

The commentator refers the reader to comments made on DEIR pages 5-4 and ES-2. No new specific comments are provided herein. See responses to comments B.16-1, and B.16-44 through 51.

Response to Comment No. B.16-54

See responses to comments B.16-1, and B.16-40 and 41.

Response to Comment No. B.16-55

See response to comment B.16-47.

Response to Comment No. B.16-56

See response to comment B.13-2.

Response to Comment No. B.16-57

See responses to comments B.16-1 and B.16-40 and 41.

Response to Comment No. B.16-58

See responses to comments B.16-1 and B.16-40 and 41.

Response to Comment No. B.16-59

The commentator requests revisions to Table 3.13-7; however, the comment is not sufficiently clear so as to permit a response.

Response to Comment No. B.16-60

The commentator asks why the Storke/Hollister intersection would remain a significant and unavoidable Class I impact, if it is recommended that the subject intersection would be subject to a standard of LOS D.

A policy in the GP/CLUP allows the Storke/Hollister intersection to operate at LOS D, which is the projected LOS under future mitigated conditions. The intersection would result in a significant and unavoidable Class I impact under CEQA because it would exceed the City's CEQA standard of LOS C.

Response to Comment No. B.16-61

See responses to comments B.16-40 and 41.

Response to Comment No. B.16-62

The commentator asks how Alternative 2 can be considered the Environmentally Superior Alternative, when it would not achieve the City's basic objective to meet current and future housing needs. The criteria for alternatives selection identified in CEQA Guidelines section 15126.6(c) states:

The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.

Although Alternative 2 would not meet the City's fair share housing allocation, it does in fact feasibly accomplish most of the basic objectives of the project with fewer adverse environmental impacts than the other alternatives. Thus, Alternative 2 remains the Environmentally Superior Alternative.

Response to Comment No. B.16-63

The commentator requests clarification of the correct housing-related numbers referenced on DEIR page 6-4. Based on changes to the Final GP/CLUP, the proposed number of housing units associated with GP/CLUP buildout has increased from 3,730 to 3,880. The FEIR has been revised to reflect the change in housing units. The population growth associated with full build-out of the GP/CLUP is anticipated to result in an additional 7,421 people.