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GOLETA WATER DISTRICT

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P.001/003



A-1

GOLETA WATER DISTRICT

4699 HOLLISTER AVENUE

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FACSIMILE COVER SHEET

To: Miss Wells

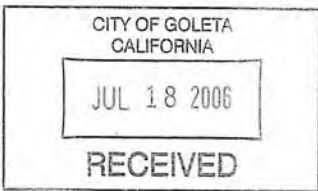
FAX NO.: 685-2635

From: Kevin Golsh

Date: 7-18-06

SUBJECT: _____

Number of pages including cover page: 3



LOCATION:805 964 7002

RX TIME 07/18 '06 16:52

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GOLETA WATER DISTRICT

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P. 002/003



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GENERAL COUNSEL

July 11, 2006

City of Goleta
Planning and Environmental
Services Department
Attention: Anne Wells
130 Cremona Drive, Suite B
Goleta, CA 93117

Re: Goleta Water District Comments to
Draft General Plan/Coastal Land Use Plan DEIR

Dear Ms. Wells:

We appreciate that the City of Goleta has utilized the Goleta Water District's Urban Water Management Plan and Water Supply Assessment for the Water Sections of the General Plan Draft EIR ("DEIR"). We therefore have almost no comments.

At page 3.9-12 at the top paragraph under City of Goleta Environmental Thresholds Manual, there is reference to the Santa Barbara County Thresholds Manual (1992) regarding the County's groundwater thresholds back at that time, prior to State Water Project water deliveries to Goleta. The County has changed this threshold as it is now outdated. That entire paragraph and the following two bullet points should be deleted from the DEIR.

A.1-1

The correct analysis on this issue is found at page 3.9-19 under Impact 3.9-3. We agree that like the County of Santa Barbara, the City of Goleta should not approve any new development on private groundwater facilities and should require all new development to be connected to the Goleta Water District system. So long as that is the case, new development will have no impact on Goleta groundwater supplies.

A.1-2

LOCATION:805 964 7002

RX TIME 07/18 '06 16:52

JUL-18-2006(TUE) 15:47

GOLETA WATER DISTRICT

(FAX)805 964 7002

P.003/003

City of Goleta

Re: Goleta Water District comments to Draft EIR

Date: July 11, 2006

Page: 2

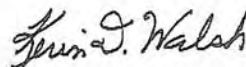
We note that in the General Plan itself, at CE-15.2 and 15.3 it is proposed that new development and City owned facilities utilize recycled water for irrigation. Although the use of recycled water for new development should be considered where feasible, there are constraints on the availability of recycled water. The District's transmission main for recycled water goes from the Goleta Sanitary District through the UCSB campus, then westerly along El Colegio to Storke Road. At Storke Road it goes north to Hollister Avenue and then west along Hollister Avenue out to the Bacara Resort. There is also a branch main which connects to the main transmission main at Hollister and Ellwood Station Road. The branch main goes north along Ellwood Station Road, crosses the freeway and goes up through the residential neighborhoods past Dos Pueblos High School to Glen Annie Golf Course. Any new development immediately adjacent to the existing mains may be able to utilize recycled water for irrigation purposes. It may not be economically feasible to require use of recycled water for new development projects that are not located near the existing mains. In addition, there is only a limited amount of recycled water capacity remaining in the system. As you have read in the District's Urban Water Management Plan the capacity of the system is approximately 1,500 AFY and the District is currently delivering approximately 1,000 AFY.

A.1-3

Please let me know if you have any questions or wish any additional information. We appreciate the cooperation to date on these matters and look forward to a good working relationship with the City and its staff in the future.

Sincerely,

GOLETA WATER DISTRICT



Kevin Walsh, General Manager and
Chief Engineer

LOCATION:805 964 7002

RX TIME 07/18 '06 16:52

Response to Comment No. A.1-1

The commentator has requested that the text under the City of Goleta Environmental Thresholds Manual should be deleted because it refers to an outdated threshold. The referenced text has been deleted from FEIR Section 3.9.3.1.

Response to Comment No. A.1-2

The commentator has stated that the City of Goleta thresholds are correctly applied under Impact 3.9-3. Comment noted.

Response to Comment No. A.1-3

The commentator has observed that using recycled water in new development may not be feasible. The City appreciates the commentator's input regarding recycled water infrastructure and capacity. Use of recycled water under GP/CLUP policy subsections CE 15.2 and 15.3 would be implemented to the extent that recycled water and associated infrastructure is available.



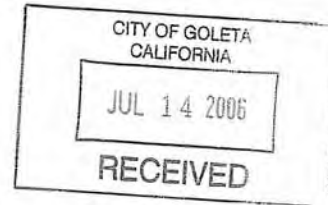
**Santa Barbara County
Air Pollution Control District**

July 12, 2006

Anne Wells, Senior Planner
Planning & Environmental Services
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

Our Vision Clean Air

A-2



SUBJECT: Goleta General Plan/ Coastal Land Use Plan: Draft Environmental Impact Report

Dear Anne,

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to comment on the Draft EIR associated with approvals related to the City of Goleta General Plan/ Coastal Land Use Plan.

In general, the APCD is pleased to note the many, significant air-quality related policies in several elements of the General Plan. We concur with the classification of long-term air quality impacts of GP/CLUP build out and cumulative impacts as Class I.

SPECIFIC COMMENTS

- 1. Page 3.3-6, Section 3.3.1.5, 2nd paragraph. The document states that the SBCAPCD has a network of 19 air quality monitoring stations. Santa Barbara County has a 17 air quality monitoring stations. A.2-1

- 2. Page 3.3-12, 1st full paragraph. The document states that SBCAPCD recommends a per day threshold of 25 pounds for ROG and NOx emissions. It is our understanding that the City of Goleta has adopted the 25 pounds per day threshold for ROG or NOx along with the other environmental thresholds from the County of Santa Barbara. A.2-2

- 3. Page 3.3-12, 3rd full paragraph. The document states correctly that the SBCAPCD has not adopted significance thresholds for construction-related emissions...however it was not, "because of their temporary nature". CEQA requires the analysis of short-term impacts of a project. Although there are no adopted short-term thresholds of significance, as a rule of thumb, construction A.2-3

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City of Goleta: General Plan DEIR
July 12, 2006
Page 2 of 2

projects with the potential to exceed 25 tons per year of ROG or NOx are considered significant.

A.2-3

4. Page 3.3-14, Long-Term Impacts, Impact 3.3-1. The document erroneously compares the Santa Barbara County 2030 VMT projections for the GP/CLUP with the 2020 average annual growth projection in the CAP and concludes that there is a potential inconsistency with the CAP. APCD recommends that the consistency with the 2004 Clean Air Plan be limited to comparing population projections, not VMT or extrapolated emissions estimates. As stated in the APCD Scope and Content of Air Quality Sections in Environmental Document guide, by definition, consistency with the Clean Air Plan means that direct and indirect emissions associated with the project (in this case the General Plan) are accounted for in the Clean Air Plan's emissions growth assumptions. The Clean Air Plan relies primarily on the land use and population projections provided by the Santa Barbara County Association of Governments and ARB on-road emissions forecast as a basis for vehicle emission forecasting. The growth assumptions for Goleta in the current Clean Air Plan are greater than the draft Goleta General Plan. Therefore, this is not considered an adverse impact.

A.2-4

5. Page 3.3-17, Impact 3.3-2. The document states the increase in VMT is greater than the rate of population growth for the same area. This statement is true for almost any area. It is not clear how the Regional VMT emission estimates in Table 3.3-7 for the City of Goleta portion were derived. For the reasons provided above, the APCD suggests that such a method to determine consistency of the GP/CLUP with the 2004 CAP is not necessary.

A.2-5

Please contact me at 961-8893 if you have any questions.

Sincerely,

Vijaya Jammalamadaka, AICP
Air Quality Specialist
Technology and Environmental Review Division

cc: Bobbie Bratz, Public Information and Community Programs Supervisor
Project File (Goleta: General Plan)
TEA Chron File \\sbcapcd.org\shares\groups\pca\tep\pccorr\goleta general plan deir-bb.doc

Response to Comment No. A.2-1

The commentator correctly observes that the incorrect number of monitoring stations is noted. The number “19” has been removed and replaced with “17” in the FEIR.

Response to Comment No. A.2-2

The commentator has requested clarification regarding daily thresholds for ROG and NO_x. Comment noted. Text has been added to the FEIR to clarify the definition of significant impacts to regional air quality.

Response to Comment No. A.2-3

The commentator has requested clarification regarding significance thresholds for construction-related emissions. Comment noted. Text has been added to the Final EIR to clarify this issue.

Response to Comment No. A.2-4

The commentator is of the opinion that comparisons between the VMT projections and the CAP projections are in error. CEQA requires that projects be consistent with the CAP. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the CAP. It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration at a stage early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals contained in the CAP. Only new or amended general plan elements, specific plans, and major projects need to undergo a consistency review. This is because the 2004 CAP strategy is based on projections from local general plans throughout Santa Barbara County. Projects that are consistent with the most recently adopted regional growth forecasts are considered consistent with the CAP.

The SBCAPCD approach to CEQA analyses of general plans is to emphasize the review of population growth forecasts rather than produce a detailed evaluation of emissions. From the SBCAPCD’s perspective, evaluation of VMT and extrapolated emission estimates is not necessary. SBCAPCD’s Scope and Content of Air Quality Sections in Environmental Document guide calls for consistency with the forecast used in the most recently adopted CAP, which is the 2004 CAP. A key principle in the SBCAPCD guidance is that a project is accommodated by and consistent with the CAP to the extent that it fits within the population forecasts assumed in the CAP. If the population growth projections included in the 2004 CAP are not exceeded, then a general plan would generally be considered to be consistent with the 2004 CAP.

In a discussion with SBCAG (Brian Bresolin, Planning Manager, August 8, 2006), it was noted that the previous 1994 Regional Growth Forecast for the Goleta region, which was used in preparation of the 2004 CAP, used the projected number of households (at 100% occupancy rate) to estimate the population forecasts. SBCAG projected the number of households at approximately 15,422 for the Goleta region at buildout. With 15,422 households, the population would be at approximately 47,108 at horizon year 2030. The proposed GP/CLUP projects a buildout of household units at approximately 15,361 with an estimated population of 38,097 for the year 2030. Because the GP/CLUP buildout households and population forecast is less than that forecasted by SBCAG, the proposed GP/CLUP plan is considered within the SBCAG regional growth forecasts and therefore consistent with the 2004 CAP.

The FEIR reflects all new information applicable to the analysis and discussion in Impact 3.3-1. Please note that the new information has reduced the impact classification in the FEIR. The discussion on the VMT analysis has been removed from Impact 3.3-1. The discussion in Impact 3.3-1 focuses on the proposed GP/CLUP households and population growth forecasts and determines the consistency with the 2004 CAP. The impact conclusion for Impact 3.3-1 has changed from Class I (significant and unavoidable impact) to Class III (less-than-significant impact). Because the impact sections are organized in impact classification sequences from Class I to Class IV, the impact section for GP/CLUP population growth forecasts has been renumbered and moved into the Class III section.

Response to Comment No. A.2-5

The commentator has requested clarification regarding the Regional VMT emission estimates in Table 3.3-7. The purpose of an EIR is to analyze and report the environmental impacts related to the implementation of a project. The EIR presents the impacts from project construction and long-term operation in the form of emission rates so that the local and regional effects can be assessed. However, SBCAPCD suggests that the evaluation of VMT and extrapolated emission estimates are not necessary.

In discussions with SBCAPCD and SBCAG, it was noted that conducting an emission analysis using the latest VMT estimates would only show conflicting results between the use of the DEIR citywide VMT emission estimates and the 2004 CAP emission budget. These organizations further explained that it would be misleading to extrapolate the both VMT and emission budget data from the 2004 CAP for the Goleta area and then compare these extrapolated data to the DEIR emission estimates. Goleta contributes such a small portion of the regional 2004 CAP emissions that trying to extrapolate the data and compare it to more focused Goleta DEIR emission estimates is not a fair comparison. Both agencies also noted that VMT emission estimates are typically used for regional transportation conformity projects, which would not facilitate the citywide air quality impact assessment.

Because motor vehicles are the largest source of air emissions in the area, consistency can be assessed by reviewing the SBCAG 2030 Travel Forecast VMT data with respect to the VMT data from the proposed GP/CLUP. The General Plan would result in 185,346 VMT in the year 2030. Based on a year 2005 VMT of 143,978, this represents an average increase of 1.15 percent per year. The regional VMT forecasts under the 2030 Travel Forecast for Santa Barbara County show an increase of about 1.96 percent per year. As such, vehicle growth projected under the GP/CLUP is less than that forecast under the 2030 Travel Forecast for Santa Barbara County, and the project is therefore consistent.

Although implementation of development consistent with the proposed GP/CLUP will result in an annual average VMT growth rate of 1.15 percent, which is greater than the rate of population growth for the Goleta region, the proposed project is consistent with the 2004 CAP and other regional plan strategies to reduce the number of trips and the length of trips in the region and to improve the balance between jobs and housing at the subregional level. The 2004 CAP recognizes that emissions due to trips and mode choices are not only a function of the transportation system but also relate to the proximity of housing and job-generating land uses and the proximity of jobs to transportation infrastructure and transit. The proposed GP/CLUP facilitates the development of housing opportunities close to the regional employment and transportation centers. Therefore, the proposed project is considered consistent with the goals and policies of SBCAG's Regional Transportation Plan and the SBCAPCD's 2004 CAP.

The FEIR reflects all new information applicable to the analysis and discussion in Impact 3.3-2. Please note that the new information has reduced the impact classification in the FEIR. The discussion on the emission estimates has been removed from Impact 3.3-2. The discussion in Impact 3.3-2 focuses on the proposed GP/CLUP VMT forecasts and determines the consistency with the SBCAG's 2030 Travel Forecast. The impact conclusion for Impact 3.3-2 has changed from Class I (significant and unavoidable impact) to Class III (less-than-significant impact). Because the impact sections are organized in impact classification sequences from Class I to Class IV, the impact section for GP/CLUP population growth forecasts has been renumbered and moved into the Class III section.



City of Santa Barbara

Santa Barbara Airport

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July 13, 2006

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SUBJECT: COMMENTS ON DRAFT GOLETA GENERAL PLAN ENVIRONMENTAL IMPACT REPORT (DEIR)

Dear Ms. Wells:

Thank you for the opportunity to comment the above-referenced DEIR. Generally, the draft document is responsive to areas of Airport concern in land use, safety and noise. However, we do have comments pertaining to cumulative impacts, regulatory framework, airport-related projects and the feasibility of proposed Noise Element policies as mitigation measures. Our comments are provided below.

Table 3-1: Cumulative City of Santa Barbara Development Projects

The list of cumulative projects for the City of Santa Barbara does not include buildout of the Airport Industrial Specific Plan area, including development of the approved Citrix Center project. Under the Specific Plan, which was adopted in 1997, up to 172,000 sq. ft. of existing buildings would be demolished and up to 412,000 sq. ft. of new building space would be constructed. As envisioned by the Specific Plan, 220,000 sq. ft. of industrial and research and development facilities, 102,000 sq. ft. of airport commercial uses, 70,000 sq. ft. of new aviation facilities, and 20,000 sq. ft. of new commercial recreation facilities could be constructed.

The approved Citrix Center, which will be located at 6100 Hollister Avenue, would include a 160,000 sq. ft. research and development/office facility and 20,000 sq. ft. of retail and restaurant development. The City has also approved construction of 24 of 55 potential new T-hangars envisioned under the Specific Plan.

The cumulative effects of buildout of the proposed Airport Industrial Specific Plan, including the approved Citrix Center and T-hangar projects must be taken into consideration in the DEIR and particularly as part of the analyses of air quality and traffic impacts.



A.3-1

Goleta General Plan DEIR
 July 13, 2006
 Page 2 of 3

Section 3.7.1.7: Airport Related Hazards

In 2002, the California Business and Professions Code, along with portions of the Civil Code was amended by the State Legislature (Assembly Bill 2776) to add disclosure requirements for prospective buyers regarding whether the sale property lies within an officially mapped "Airport Influence Area" (AIA). The law became effective January 1, 2004. In September 2003, in anticipation of enactment the new law, the Santa Barbara County Association of Governments (SBCAG) acting as the County Airport Land Use Commission (ALUC) adopted AIA boundaries for Santa Barbara County.

A.3-2

The adopted AIA is solely used for real estate disclosure purposes and should not be confused with the regulatory planning boundary for the purposes of the 1993 Santa Barbara County Airport Land Use Plan (ALUP). The planning boundaries for purposes of regulation by the ALUC are defined in Chapter 4 of the ALUP. The AIA bears no relationship whatsoever to the Safety Areas (1, 2 and 3) designated in the County's 1993 Airport Land Use Plan (ALUP), which are the areas subject to ALUC purview. Therefore, the reference to the AIA in this section should be deleted.

Further, the discussion of the three "safety corridors" found in this section of the DEIR is not consistent with the safety zones (Safety Areas 1-3) identified on pages 27-29 of the ALUP. This section should be amended to reflect the language in the ALUP.

A.3-3

Section 3.7.2: Regulatory Framework

This section should reference Federal Aviation Administration regulations pertaining to obstructions and height limitations in navigable airspace found in Federal Aviation Regulation (FAR) Part 77, the Caltrans Division of Aeronautics California Airport Land Use Planning Handbook and the Santa Barbara County Airport Land Use Plan (ALUP). Pursuant to CEQA Guidelines Section 15154, the lead agency must utilize the ALUP to "assist in the preparation of the EIR relative to potential airport or related safety hazards or noise problems."

A.3-4

Section 3.7.3.3: Class II Impacts. Impact 3.7-5 – Airport

Page 3.7-18, first paragraph: Runway Safety Areas (RSAs) provide protection to passengers and aircraft in the event of an accidental aircraft overrun or undershoot of a runway. The project currently under construction will provide new RSAs at both ends of Santa Barbara Airport's main runway (Runway 7-25) to meet current FAA design standards of 500 feet wide by 1,000 feet long at each end. The existing RSA at the west end of Runway 7-25 is approximately 320 feet long, ending at Tecolotito Creek. At the east end, the existing RSA is 215 feet in length, terminating at San Pedro Creek and Fairview Avenue.

A.3-5

Goleta General Plan DEIR
 July 13, 2006
 Page 3 of 3

The City of Santa Barbara is not extending Runway 7-25 800 feet to the west. Rather, the Airport is shifting the location of Runway 7-25 by 800 feet to the west to accommodate the new eastern RSA that will be compliant with FAA standards. The project will not increase the Runway 7-25 runway length of 6,052 feet. Construction of this project is underway and will be completed in 2007.

A.3-5

Section 3.10.2.2: County Airport Land Use Plan and Airport Influence Area (AIA) Zones

As stated under Section 3.7.1.7 above, the adopted AIA is solely used for real estate disclosure purposes and is not a planning boundary for purposes of the ALUP, as indicated in the sections entitled "Airport Land Use Plan" and "Airport Influence Area Zones" on pages 3.10-10 and 3.10-11. The AIA bears no relationship whatsoever to the Safety Areas (1, 2 and 3) designated in the ALUP.

A.3-6

Section 3.11.3.3: Noise Project Impacts, Class III Impacts, Page 3.11-6

Please note that portions of proposed General Plan Policy NE-3, specifically the portion of Policy NE 3.1 pertaining to Airport hours of operation and Policy NE-3.2, are infeasible. Pursuant to Airport Noise and Capacity Act of 1990 (ANCA) the Airport has no legal authority to regulate flight paths, aircraft type or hours of operation. Please reference U.S. Code Title 49, Subtitle VII, Part B, Chapter 475, Subchapter II to review the full text. ANCA is implemented by Federal Aviation Regulation Part 161. Therefore, in our previous comments on the Draft General Plan dated March 24, 2006, we recommend that these policies be amended to delete this language.

A.3-7

Once again, we request that the City of Goleta continue to keep us informed of changes to the draft General Plan during its development, so that we may have the opportunity to comment on any Airport-related issues. If you have any questions pertaining to these comments, please feel free to call me at 967-7111 or Airport Project Planner Laurie Owens at 692-6023.

Sincerely,



Karen Ramsdell
 Airport Director

Response to Comment No. A.3-1

The commentator notes the DEIR list of cumulative projects did not include the approved Citrix Center project, T-hangars, and other future development envisioned as part of buildout of the Airport Industrial Specific Plan.

While the land use table used in the City's traffic model did account for future development in the areas that encompass the approved Citrix project and T-hangars, it did not include all the future development associated with the approved Citrix Center development. As such, the City revised the land use assumptions in the travel model to include the approved Citrix Center development, and has revised the cumulative project list accordingly. The Industrial Specific Plan (future planned development) is not included in the cumulative analysis.

Response to Comment No. A.3-2

The commentator states that the Airport Influence Area (AIA) only applies to real estate disclosures, not the regulatory planning boundary. References to the Airport Influence Area (AIA) are deleted from FEIR Section 3.7.1.7, Airport Related Hazards.

Response to Comment No. A.3-3

The commentator has correctly observed that the discussion of safety areas is not consistent with the ALUP. Section 3.7.1.7, "Airport Related Hazards," is changed to reflect the correct definition/description of safety areas per the ALUP.

Response to Comment No. A.3-4

The commentator requests that the EIR include a discussion of related Federal Aviation Administration (FAA) regulations. Section 3.7.2, "Regulatory Framework," is updated to include references to FAA Federal Aviation Regulations (FAR) Part 77, "Objects Affecting Navigable Airspace."

Response to Comment No. A.3-5

The commentator provides information regarding airport runway construction activities. Sections 3.7.1.7 and 3.7.3.3 (Impact 3.7-5) is updated with respect to references to Runway 7-25 to indicate that this runway will be "shifted" 800 feet to the west to accommodate the new eastern Runway Safety Area (RSA). Runway 7-25 will remain 6,052 feet when the modification is completed and will comply with FAA standards, which specify RSAs of 500 feet wide and 1,000 feet long at both ends. Construction will be completed in 2007.

Response to Comment No. A.3-6

The commentator repeats a request from Comment A.3-2 to delete references to the AIA from pages 3.10-10 and 3.10-11 as it "bears no relationship whatsoever to the Safety Areas (1, 2 and 3) designated in the ALUP." References to the AIA have been deleted from pages 3.10-10 and 3.10-11 in the FEIR.

Response to Comment No. A.3-7

The commentator has requested that the EIR be modified reflect the fact that the airport has no legal authority to regulate flight paths, aircraft types, or hours of operation. This policy states, “the City shall also continue to encourage the airport to limit aircraft noise between the hours of 11 p.m. and 7 a.m.” Although the airport does not have regulatory authority to limit hours of operation of the airport, the airport can advise pilots and operators that the City desires this to reduce noise impacts to neighbors. Accordingly, the City, as a matter of policy, wants to continue to encourage the airport to limit hours of operation where feasible.



Arnold Schwarzenegger
Governor

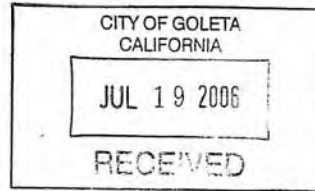
STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

A-4

July 14, 2006



Anne Wells
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

Subject: Draft Goleta General Plan/ Coastal Land Use Plan
SCH#: 2005031151

Dear Anne Wells:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 13, 2006, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

A.4-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2005031151
Project Title Draft Goleta General Plan/ Coastal Land Use Plan
Lead Agency Goleta, City of

Type EIR Draft EIR
Description The Draft Goleta General Plan/ Coastal Land Use Plan includes 9 elements: Land Use, Open Space, Conservation, Safety, Visual and Historic Resources, Transportation, Public Facilities, Noise, and Housing. At build-out the plan would allow approximately 3,730 additional residential units, 704,000 net square feet of new commercial floor area, and 1,377,000 net square feet of new industrial/business floor area. The plan includes specific proposals for new transportation facilities, parks, and other facilities and services to accommodate future growth. Policies emphasize maintenance of target service levels. Future residential development is focused along the existing public transportation corridor (US 101 / Hollister Avenue / Union Pacific RR). The plan emphasizes mixed-use development on infill and redevelopment sites, as well as transportation modes.

Lead Agency Contact

Name Anne Wells
Agency City of Goleta
Phone 805-961-7557 **Fax** 805-685-2635
email awells@cityofgoleta.org
Address 130 Cremona Drive, Suite B
City Goleta **State** CA **Zip** 93117

Project Location

County Santa Barbara
City Goleta
Region
Cross Streets Citywide

Parcel No.	Range	Section	Base
Township			

Proximity to:

Highways Highway 101, 217
Airports Santa Barbara Municipal
Railways UPRR
Waterways Pacific Ocean
Schools UCSB, various
Land Use First General Plan for recently incorporated City; no existing general plan; various existing zoning districts

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Coastal Zone; Economics/Jobs; Cumulative Effects; Geologic/Seismic; Flood Plain/Flooding; Forest Land/Fire Hazard; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Office of Emergency Services; California Highway Patrol; Caltrans, Division of Aeronautics; Caltrans, District 5; Department of Health Services; Regional Water Quality Control Board, Region 3; Native American Heritage Commission; State Lands Commission

Date Received 05/30/2006 **Start of Review** 05/30/2006 **End of Review** 07/13/2006

Note: Blanks in data fields result from insufficient information provided by lead agency.

Response to Comment No. A.4-1

The commentator acknowledges that the City, as Lead Agency, has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA. Comment noted. No other response is required.

07/17/06 14:25 FAX 805 549 3077

CALTRANS, PLANING

001

A-5

CALIFORNIA DEPARTMENT OF TRANSPORTATION



District 5
50 Higuera Street
San Luis Obispo, CA 93401-5415

Facsimile Cover Sheet

DATE: 06-17-06

TO: Mr. Kenneth M. Curtis FROM: James Kilmer
Director Planning & Local Programs

PH#: 961-7500 PH#: (805) 549-3683

FAX#: 605-2635 FAX#: (805)549-3077 / 8-529-3077

TOTAL PAGES TO FOLLOW:

MESSAGE:

Mr. Curtis; Here are our comments regarding the DEIR for the City's General Plan.

LOCATION:805 549 3077

James
RX TIME 07/17 '06 15:26

07/17/06 14:25 FAX 805 549 3077

CALTRANS, PLANING

002

A-5

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3111
FAX (805) 549-3329
TDD (805) 549-3259
<http://www.dot.gov/dist05>



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July 15, 2006

SLO- 101, 217, 154,
192 PM Var, Var,
Var, Var

Kenneth M. Curtis, Director
Planning & Environmental Services
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA. 913117

Dear Mr. Curtis:

RE: Comments Regarding the Draft Environmental Impact Report for the City of Goleta 2006 General Plan

The California Department of Transportation (Caltrans) has reviewed the above referenced Environmental Document and as a result, the following comments were generated.

General Comments

Caltrans acknowledges the adequacy of the basis from which Goleta's General Plan, traffic impact study was generated and that the City's traffic model has been calibrated and validated. The recent traffic 2003 and 2005 counts taken by the City are adequate for inclusion in the traffic study and for use in calibrating the City's model. Caltrans generally considers traffic counts taken within two years appropriate for inclusion in traffic studies analyzing conditions on the State highway system.

A-5-1

Specific Comments

1. (Ref. Section 3.13 -Page 3.13-3, *Existing Conditions*) Please be advised that Caltrans uses LOS Cusp "C/D" (delay greater than 35.0 seconds as a significance threshold) for signalized and unsignalized/intersections on the State highway system.

A-5-2

2. (Ref. Section 3.13- Page 3.13-16, *Signalized Intersections*) In 2002, The Santa Barbara County Congestion Management Agency (CMA) and Caltrans agreed

A-5-3

"Caltrans improves mobility across California"

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CALTRANS, PLANING

003

Mr. Curtis
 July 15, 2006
 Page 2

to a standard countywide methodology for analyzing intersection Level of Service (LOS) operations within the State's jurisdiction. Caltrans, in its *Guidelines for the Preparation of Traffic Impact Studies*, promotes the use of the *Highway Capacity Manual (HCM) 2000* as its preferred traffic analysis methodology for signalized intersections. We agreed to allow the use of Intersection Capacity Utilization (ICU) methodology with "Camarillo Inputs" for analysis on the State highway system. We further agreed that if the initial ICU analysis indicated a significant traffic impact (Cusp "C/D" breach) at one of our intersections, that a follow-up analysis utilizing the HCM 2000 methodology would take place. The idea here would be that we would rely on HCM 2000 to refine the extent of the significance of the traffic impacts and then base needed mitigation on this subsequent detailed analysis.

A.5-3

3. (Ref. Section 3.13- Page 3.13-18, *Analysis of Future Scenarios*) It would be very helpful at this point in the traffic study to include a table featuring a breakdown of 2030 GP buildout scenario and the resulting increase in total peak hour traffic being generated. The new table should utilize the Institute of Transportation Engineers (ITE) 7th Edition, Trip Generation to glean these categories of added peak hour trip totals.

A.5-4

4. (Ref. Section 3.13-Page 3.13-20, *Table 3.13.9 Intersection LOS – Proposed Project (2030 Buildout)*) According to the previously mentioned methodology agreement with the CMA, all intersections in the State highway system listed in this table as being brought below LOS Cusp "C/D" as a result of GP buildout, need to have a subsequent HCM 2000 LOS analysis performed in order to identify traffic impacts and appropriate mitigation.

A.5-5

Also, *The Final General Plan 2030 Forecast Report* included as an appendix item in the DEIR, lists the widening of U.S. 101 from 4 to 6 lanes between Fairview Ave and Glen Annie Rd. as an assumed improvement (GP-7) for the purposes of the GP 2030 buildout traffic impact analysis. This widening project is an unconstrained project – that is, no funding has been identified nor programmed for it. Assuming the U.S.101 6-lane widening as being in place as an existing condition will have the effect portraying GP buildout traffic impacts to State highway facilities as less significant. An extra through-lane on U.S. 101 would improve interchange ramp and 101 through-lane weave operations. Since the 6-lane widening project is unconstrained it should not be "assumed" or included as an existing condition. The GP-7 scenario should omit this assumed improvement.

A.5-6

5. (Ref. Section 3.13-Page 3.13-23, *Table 3.13-11 Recommended Major Infrastructure Improvements*) The Cathedral Oaks Interchange project listed in this table, as of the May 2006 printing of the *District 5 Status of*

A.5-7

"Caltrans improves mobility across California"

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CALTRANS, PLANING

004

Mr. Curtis
 July 15, 2006
 Page 3

- Projects*, had not received any programmed money. Mention is made in the Status of awaiting word on commitment of State Highway Operation & Protection Plan (SHOPP) funds. Therefore the funding status of this project remains uncertain (nothing programmed yet). This project is currently expected to go into construction in 2012. **A.5-7**
6. (Ref. Section 3.13- Page 3.13-24 *Table 3.13-12 Recommended Intersection Improvements*) The improvements/mitigation listed in this table need to be reconsidered through an additional HCM 2000 traffic analysis and without the 6-lane widening project in place as an assumed condition. **A.5-8**
7. (Ref. Section 3.13- Page 3.12-25 *Table 3.13-13 Intersection LOS – Proposed Project With Recommended Transportation Improvements*) The improvements/mitigation listed in this table need to be reconsidered through an additional HCM 2000 traffic analysis and without the 6-lane widening project in place as an assumed condition. Also, a signal warrants analysis must be performed prior to the installation of a traffic signal on State highway facilities. **A.5-9**
8. (Ref. Section 3.13 – Page 3.13-29 *Class II Impacts: Long-Term Impacts, Intersections*) The impacts that fall below LOS Cusp “C/D” again , need to be reanalyzed utilizing HCM 2000. All analysis of State highway facilities need to exclude the assumption of the 6-laning of U.S 101 between Glen Annie Rd. and Fairview Ave, since it is an unconstrained project. **A.5-10**
9. (Ref. Section 3.13 – Page 3.13-31 *Class III Impacts: Long-Term Impacts, Intersections*) This section needs to be reviewed after applying the additional HCM 2000 analysis and the exclusion of the assumption of the 6-laning of U.S 101 between Glen Annie Rd. and Fairview Ave as being an existing condition. In light of a revised analysis, these impacts may be significant. **A.5-11**
10. (Ref. April 28, 2006 Dowling Associates, Inc; Page 50 - *Final General Plan 2030 Forecast Report, Table 15, GP-7 2030 PM Peak Hour LOS Results*) This section needs to be re-reviewed after applying the additional HCM 2000 analysis and the exclusion of the assumption of the 6-laning of U.S 101 between Glen Annie Rd. and Fairview Ave as being an existing condition. **A.5-12**
11. (Ref. April 28, 2006 Dowling Associates, Inc; Page 52 - *Final General Plan 2030 Forecast Report, Freeway Mainline Operations*) This section needs to be re-reviewed after applying the additional HCM 2000 analysis and the exclusion of the assumption of the 6-laning of U.S 101 between Glen Annie Rd. and Fairview Ave as being an existing condition. **A.5-13**

“Caltrans improves mobility across California”

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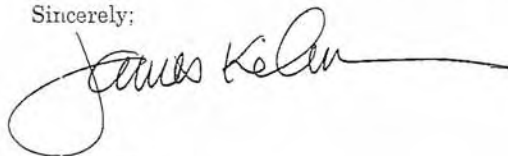
CALTRANS, PLANING

005

Mr. Curtis
July 15, 2006
Page 4

Thank you for the opportunity to review the DEIR for your new General Plan. If you have any questions, please contact me at 549-3683.

Sincerely;



James Kilmer
District 5
Development Review

c: File, D. Murray, J. McKrell, P. McClintic, J. Gonzalez, P. Martinez

"Caltrans improves mobility across California"

LOCATION:805 549 3077

RX TIME 07/17 '06 15:26

Response to Comment No. A.5-1

The commentator acknowledges the adequacy of the basis from which the GP/CLUP traffic impact study was generated and adds that Caltrans considers traffic counts taken within 2 years appropriate for inclusion in traffic studies, consistent with the GP/CLUP traffic count methodology. The comment is noted.

Response to Comment No. A.5-2

The commentator advises that Caltrans uses LOS Cusp “C/D” for signalized and unsignalized intersections on the State highway system. City staff recognizes Caltrans thresholds and is already using the same LOS Cusp C/D threshold.

Response to Comment No. A.5-3

The commentator notes that the Santa Barbara County Congestion Management Agency and Caltrans agreed to a standard countywide methodology for analyzing intersection LOS operations within the State’s jurisdiction. The commentator adds that Caltrans promotes the use of HCM 2000 as its preferred traffic analysis methodology for signalized intersections and agreed to allow the use the ICU methodology with “Camarillo Inputs” for analysis on the State highway system for planning purposes. As such, City staff proceeded with the use of the ICU methodology for the GP/CLUP planning-level analysis. City staff intends to use HCM 2000 for future project-level operational analyses, consistent with the commentator’s request.

Response to Comment No. A.5-4

The commentator notes that it would be helpful if the EIR traffic study included a table featuring a breakdown of the 2030 GP/CLUP buildout scenario and the resulting increase in total peak hour traffic being generated. The commentator also recommends that the table use the ITE 7th Edition Trip Generation Manual to glean these categories of added peak hour trip totals. Existing and projected peak hour traffic volumes are shown in Figure 3.13-5 of the FEIR. The trip generation rates used in the traffic model are based on the 7th Edition ITE Trip Generation Manual.

Response to Comment No. A.5-5

The commentator requests that the HCM 2000 LOS analysis be performed in order to identify traffic impacts and appropriate mitigation. See response to comment A.5-3.

Response to Comment No. A.5-6

The commentator suggests that the GP-7 scenario (proposed land uses with transportation improvements) should not reflect the widening of US-101 from 4 to 6 lanes between Fairview Avenue and Glen Annie Road, suggesting that funding is not identified or programmed for the improvement. City staff note that the proposed widening of US-101 is not assumed as an existing condition. It is assumed as a future condition in the traffic model.

Widening of US-101 between Fairview and Storke (PM 22.54 – 24.8) is included in the following planning documents: (1) 101 In-Motion Final Report; (2) Measure D Renewal – List of Regional Project; and (3) 2004 Regional Transportation Plan for Santa Barbara County (Project # CT 24). Given that the 2004 RTP is a financially constrained document (federal requirement), funding for

this project is consistent with projected revenue funding streams for Santa Barbara County. As such, City staff determined that the inclusion of this project in the GP/CLUP traffic model is valid.

Response to Comment No. A.5-7

The commentator states concern regarding the availability of funding for the Cathedral Oaks Interchange project, a proposed transportation system improvement in the GP/CLUP. City staff note that the City has entered into a cooperative agreement with Caltrans for the design and construction of this project. Construction of the project is scheduled to begin in 2010. Funding for the project is programmed through the State Transportation Improvement Program, Highway Bridge Replacement and Rehabilitation Program, State Highway Operation & Protection Plan, and Goleta Transportation Improvement Program.

Response to Comment No. A.5-8

The commentator states that the improvements/mitigation listed in Table 3.13-12 need to be analyzed using HCM 2000 methods and without the 6-lane widening of US-101 assumed in place. See responses to comments A.5-3 and A.5-6.

Response to Comment No. A.5-9

The commentator states that the improvements/mitigation listed in Table 3.13-13 need to be analyzed using HCM 2000 methods and without the 6-lane widening of US-101 assumed in place. See responses to comments A.5-3 and A.5-6.

The commentator also notes that signal warrant analysis would need to be performed prior to the installation of a traffic signal on state highways. City staff concurs with this statement and would expect to complete signal warrant analysis as part of the project-level design. The comment is noted.

Response to Comment No. A.5-10

The commentator states that the improvements/mitigation listed under Class II Impacts need to be analyzed using HCM 2000 methods and without the 6-lane widening of US-101 assumed in place. See responses to comments A.5-3 and A.5-6.

Response to Comment No. A.5-11

The commentator states that the improvements/mitigation listed under Class III Impacts need to be analyzed using HCM 2000 methods and without the 6-lane widening of US-101 assumed in place. See responses to comments A.5-3 and A.5-6.

Response to Comment No. A.5-12

The commentator states that the improvements/mitigation listed in Table 15 of the Traffic Technical Report need to be analyzed using HCM 2000 methods and without the 6-lane widening of US-101 assumed in place. See responses to comments A.5-3 and A.5-6.

Response to Comment No. A.5-13

The commentator states that the improvements/mitigation listed for Freeway Mainline Operations of the Traffic Technical Report need to be analyzed using HCM 2000 methods and without the 6-lane widening of US-101 assumed in place. See responses to comments A.5-3 and A.5-6.

SUSAN J. ROSE
County Supervisor
Second District

ALISSA HUMMER
Executive Staff Assistant

RACHEL L. COUCH
Administrative Assistant

JANE S. FERRY
Administrative Assistant

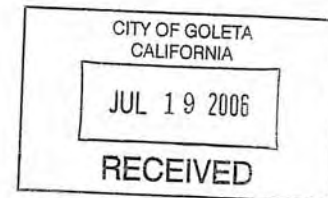


A-6 BOARD OF SUPERVISORS
105 East Anapamu Street
Santa Barbara, California 93101

TELEPHONE: (805) 568-2191
FAX: (805) 568-2283

E-mail: srose@co.santa-barbara.ca.us

SANTA BARBARA COUNTY



July 17, 2006

Mayor and Council of the City of Goleta
130 Cremona Drive
Goleta, CA 93117
Attn: Anne Wells

**Re: Goleta General Plan/Coastal Land Use Plan
Draft Environmental Impact Report**

Dear Mayor Wallis and Council:

Thank you for the opportunity to review the Goleta General Plan/Coastal Land Use Plan and Draft Environmental Impact Report. As the County Supervisor for the 2nd District which includes portions of the City of Goleta, I would like to commend you for a thorough and detailed document which will guide the City's future.

As the County co-chair of the Southern California Wetlands Recovery Project, which seeks to protect, restore and expand the few coastal wetlands remaining in Southern California, I would like to express my support for strong wetland and watershed protections in both the coastal and inland areas of Goleta. Because watersheds and wetlands do not correspond to political or jurisdictional boundaries, I have long been a proponent of watershed management planning on the local and regional level. Comprehensive and coordinated approaches to resolving water resource issues--be they water quality, land use, sensitive habitats, creek restoration, recreation or flood control--is the only way to successfully protect these fragile ecosystems and avoid piecemeal planning.

A.6-1

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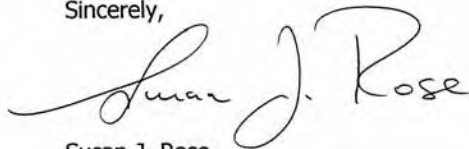
To this end I would like to request that two documents be incorporated into the Goleta General Plan by reference: 1) the 2004 Draft County Lands Inventory with Enhancement Opportunities and 2005 Recommendations Report compiled by my 2nd District Natural Resources Advisory Committee received by the County Parks Commission in September 2005 <http://www.countyofsb.org/susanrose/html/nrac.html> , and 2) San Jose Creek Watershed Management Plan, 2005 http://www.countyofsb.org/project_cleanwater/sanjose.htm#SanJoseWatershedPlan

A.6-1

Both documents were created through extensive community involvement and pertain to areas within the 2nd District including portions of the City of Goleta. These documents will provide valuable baseline data to the City and can serve as useful models of how watershed management, described in policy CE 10, can be applied in the Goleta Valley. The current visioning process for the unincorporated areas of the Goleta Valley is also incorporating new approaches to watershed management and proactive resource protection as the County moves toward updating its Community Plan for this area.

Again, thank you for holding strong on wetland and watershed protection as demonstrated in your unanimous conceptual vote on June 28, 2006. Working together locally and regionally to protect our precious natural resources and open space is the way to successful achieve our mutual goals.

Sincerely,



Susan J. Rose
Second District Supervisor
Santa Barbara County

Response to Comment No. A.6-1

The commentator expresses her appreciation for the DEIR and expresses support for wetlands and watershed protection. The commentator specifically requests that two documents be incorporated in the GP/CLUP by reference: (1) the 2004 Draft County Lands Inventory with Enhancement Opportunities and 2005 Recommendations Report compiled by the 2nd District Natural Resources Advisory Committee received by the County Parks Commission in September 2005 (<http://www.countyofsb.org/susanrose/html/nrac.html>); and (2) San Jose Creek Watershed Management Plan, 2005.

The subject documents have not been incorporated into the GP/CLUP by reference because the scopes of those documents extend beyond that applicable to the Goleta GP/CLUP. Nonetheless, the City shares the commentator's commitment to protect wetlands and watersheds, and has addressed those topics at a suitable level of detail in the planning-level GP/CLUP.

A-7

July 18, 2006

Planning & Environmental Services
Attn: Anne Wells
130 Cremona Drive, Suite B
Goleta, CA 93117

RE: Goleta General Plan/Coastal Land Use Plan DEIR

Dear Ms. Wells:

The County Board of Supervisors has had the opportunity to review the City of Goleta's General Plan/Coastal Land Use Plan Draft EIR and offers the following comments for your consideration in finalizing this important planning document. Detailed comments are attached to this letter.

Please feel free to contact Dianne Meester, Assistant Director of Planning and Development at (805) 568-2086 for clarification of any of the attached comments.

Sincerely,

Joni Gray, Chair
Santa Barbara County Board of Supervisors

ATTACHMENT A

SPECIFIC COMMENTS ON CITY OF GOLETA'S GENERAL PLAN/COASTAL LAND USE
PLAN DRAFT EIR*Chapter 3: Environmental Setting, Impacts, and Mitigation*Section 3.1—Aesthetics and Visual Resources

- The EIR does not consider possible adverse impacts to public viewing locations outside the city's boundaries, due to potential development within the City. While it is acknowledged that an assessment of such impacts necessarily would be very general, such potentially significant impacts should be recognized and discussed in the same manner as for impacts to public viewing locations within the City itself. This would be especially relevant to impacts from night lighting and glare, which increase regional nighttime skyglow.

A.7-1

Section 3.2—Agriculture and Farmland

- On Figure 3.2-1, the text box for "Future Service Area Agriculture Site #4" does not have a pointer to any site on the map. Also, the discussion of impacts and mitigations should consider cases where development on city lands could conflict with agricultural uses on adjacent or nearby unincorporated lands. The City of Goleta should explore possible feasible mitigation measures that could be for the City to adopt a Right-to-Farm Ordinance, with protections for agricultural operators that would be at least as strong as those contained in the County's Right-to-Farm Ordinance.

A.7-2

A.7-3

A.7-4

Section 3.4—Biological Resources

- It is noted that the project contains a prohibition against planting non-native invasive species within environmentally sensitive habitat areas and buffers (pg 3.4-21). Additional mitigation could be achieved by prohibiting the use of such invasive species in any area where a landscape plan would be required for City review and approval, since by their nature, invasive species often colonize larger areas that can include offsite sensitive habitats, whether within or outside the City's boundaries.

A.7-5

Section 3.8—Population and Housing

- It is not clear how Policy LU 11, Non-Residential Growth Management, would serve as a feasible mitigation measure for potentially significant Impact 3.8-2 Population Growth [associated with residential buildout] (pg. 3.8-15, 16); the categorical statement on p. 3.8-16 that this policy would mitigate this impact to a less than significant level is tenuous. This discussion also should note that the impact sections that address related physical effects, which are listed on pg. 3.8-15, also contain various mitigation measures for these effects. This also applies for the discussion of specific effects related to Impact 3.8-3, Ultimate Buildout [of residential units] (pg. 3.8-16, 17).

A.7-6

Within the discussion of Impact 3.8-4, Ultimate Buildout [of residential land and associated employment growth] (pg. 3.8-18), in the middle of the first paragraph there is a reference to Table 3.8-9, which doesn't exist; perhaps this reference should be to Table

A.7-7

3.8-7 (pg. 3.8-16). Also there are statements at the end of the second paragraph regarding potentially increased traffic between Goleta and Santa Barbara on Hwy 101, which is "considered a potentially significant adverse impact." It is unclear if this conclusion is within the specific context of Impact 3.8-4, or within the context of effects discussed in Section 3.13, Transportation. In the former case, the discussion of mitigation on 3.8-18 should demonstrate how the traffic impact would be mitigated to non-significance by the listed policies; in the latter case, specific reference to the relevant portion(s) of Section 3.13 should be included.

A.7-8

Section 3.9—Water Resources

• *Section 3.9.1.3: Flooding*

- In the second paragraph, first sentence: (FEMA 2006) should be changed to read (FEMA 2005)

A.7-9

• *Section 3.9.2.2: Local*

- This section should include reference to the Flood Control District's authority to review/approve proposed improvements located along certain creeks and channels that it maintains within the City of Goleta limits.

A.7-10

• *Impact 3.9-2: Adequacy of Water Supplies to Serve New Development*

- In addressing the impacts of growth on the City's water resources, the General Plan stipulates that Mitigation Policy 15 will be implemented. Mitigation Policy 15 requires City facilities and residences to utilize recycled water. This policy should be conditioned on the availability of recycled water from the Goleta Water District, the local purveyor of recycled water, to ensure that adequate infrastructure and capacity is available. The use of recycled water for irrigation of common areas of large developments, street medians and other public areas is a recognized beneficial use of recycled water. However, current state law does not allow the use of recycled water for irrigation for private residences, nor is such use recommended due to health and safety concerns.

A.7-11

• *Impact 3.9-3: Changes in Groundwater Supply Resulting from New Development*

- Please see comment above on *Impact 3.9-2*

A.7-12

• *Impact 3.9-4: Alterations in Existing Drainage Patters and Downstream Flooding and Erosion*

- The first sentence of this paragraph needs to be carefully re-worded. It is not acceptable to alter existing drainage patterns as stated, unless the proposed alterations in and of themselves cause no adverse impact of their own.

A.7-13

Section 3.10—Land Use and Recreation

- It appears that this section is intended to include an overall analysis of applicable plans and policies, and potential inconsistencies between the Draft General Plan/Coastal Land Use Plan and such other adopted plans and policies. If so, then a discussion of the Clean Air Plan and Congestion Management Plan should be included. This is particularly relevant to Impact 3.10-3, Conflict with Other Applicable Land Use Policies and/or Regulations [related to overall buildout and related infrastructure] (pg. 3.10-17, 18). In this regard, Section 3.3, Air Quality, does not reference to the Clean Air Plan on pg 3.3-10; however, Section 3.13, Transportation, appears not to address the Congestion Management Plan.

A.7-14

It may be desirable to split this section into two sections that separately address overall Land Use issues and more specific Recreation issues, in order to increase clarity and usefulness to the public and decision-makers.

A.7-15

Section 3.11—Noise

- The discussions of project-specific and cumulative impacts should acknowledge that development within the City may have adverse noise impacts on sensitive receptors in adjacent and nearby unincorporated areas, particularly in regard to construction activity (short-term) and vehicular traffic (long-term).

A.7-16

Section 3.12—Public Services and Utilities

- This section should reference that the Santa Barbara County Flood Control District maintains certain creeks and channels located within the City of Goleta.
- *Impact 3.12-3: Increased Demand for Wastewater Collection, Treatment and Disposal*
 - The measures contained in Mitigation Policies PF 4.2 (J) & (K) are problematic and should be reconsidered. PF 4.2 (J) states, “The City shall discourage and oppose extension of sewer service into any area not designated for urban development including areas west of Goleta and the Embarcadero Community Services District.” This policy will require any new development in these areas to utilize private septic systems for sewage disposal when the extension of the community sewer should be considered. A potential consequence of this policy could be to encourage the construction of private septic systems in areas where soil or groundwater conditions are not conducive to the on-site disposal of wastewater. The proliferation of septic systems in these marginal areas could potentially impact surface and groundwater resources.
 - PF 4.2 (K) states, “Within the Urban Boundary, all new development shall be required to connect to the public sewerage system.” As written this policy would preclude development in areas where there is no existing sewer infrastructure and where a private septic system might be appropriate. Additionally, it does not recognize current treatment technologies that reduce the impact of the on-site dispersal of wastewater on the environment.

A.7-17

A.7-18

A.7-19

A.7-20

Section 3.13—Transportation and Circulation

- This section should state that proposed bikeways located along creeks and/or channels maintained by the Flood Control District will be subject to FC review/approval and will be subject to execution of a secondary use agreement.

A.7-21

Chapter 4: Future City Service Area/Sphere of Influence

- The impact analysis in this chapter is done at a very general program level, and the EIR should acknowledge that any future actions to include these areas within the City's sphere of influence or to annex part or all of these areas to the City would be accompanied by more detailed environmental analysis.

A.7-22

Chapter 5: Alternatives to the Proposed Project

- This chapter analyzes two different land use map alternatives, but does not develop and analyze any policy-based alternatives that could avoid or reduce potentially significant adverse impacts of the Draft General Plan/Coastal Land Use Plan. At least one such policy alternative should be developed and analyzed, wherein the project would contain specific commitments to address regional issues cooperatively with the County and other affected agencies; particular regard should be given to policy measures designed to identify and avoid or reduce potentially significant adverse impacts of City decisions and activities outside the City's boundaries. This issue was addressed in more detail in the comments submitted by the County Board of Supervisors on the Draft General Plan/Coastal Land Use Plan (letter dated June 6, 2006).

A.7-23

Section 5.4.8.3—Reduced Development Scenario 2 (Alternative 2)

- Reference is made twice to Alternative 1 but should be made to Alternative 2

A.7-24

Section 5.4.10—Land Use and Recreation

- It should be acknowledged that both physical development alternatives could reduce the funding available for providing new recreational facilities, due to the reduced potential collection of impact mitigation fees. To the extent that such fees are directly correlated with increased recreational demand, this may cause no adverse impacts in a City-wide context; however, it nevertheless may hinder the development of some recreational amenities that would benefit existing residents as well as offsetting the impacts of new development.

A.7-25

Section 5.5—Environmentally Superior Alternative

- Alternative 2 is identified as the environmentally superior alternative that meets project objectives. However, it was previously stated (Section 5.4.8.3, pg 5-13) that "Under this alternative, the City would not meet its fair share allocation to provide adequate housing and address regional growth" (first paragraph in Section 5.4.8.3). Since meeting identified housing goals is a major objective of the project, perhaps something other than Alternative 2 should be identified as the environmentally superior alternative.

A.7-26

Response to Comment No. A.7-1

The commentator alleges that the DEIR does not consider possible adverse impacts to public viewing locations outside the City's boundaries due to potential development within the City. Appropriate text has been added to Section 3.1 of the FEIR regarding the minimal impacts of the GP/CLUP to public viewing locations and nighttime light and glare.

Response to Comment No. A.7-2

The commentator has correctly observed that Figure 3.2-1 does not contain a pointer to any site on the map for Future Service Area Site #4. Figure 3.2-1 has been modified to include this pointer to the site.

Response to Comment No. A.7-3

The commentator has requested that the discussion of impacts and mitigations include instances where agricultural uses could conflict with adjacent or nearby unincorporated lands. The text supporting Impact 3.2-2 has been revised to include this discussion.

Response to Comment No. A.7-4

The commentator has requested that the EIR include possible mitigation measures through a City right-to-farm ordinance. This issue is adequately addressed by GP/CLUP policy subsection CE 11.3, "Compatibility of New Development with Agriculture," which includes requirements for right-to-farm covenants and disclosure notices for any development located adjacent to agriculture land. No additional mitigation is required.

Response to Comment No. A.7-5

The commentator recommends expansion of a GP/CLUP policy regarding invasive plant species. No response required.

Response to Comment A.7-6

The commentator may be misinterpreting Impact 3.8-2, "Population Growth Associated with Implementation of the GP/CLUP Is Anticipated to Result in an Increase in the Population by 24 Percent at Full or Ultimate Buildout," and the applicability of GP/CLUP Policy LU 11, "Non-Residential Growth Management," to mitigate impacts related to residential development from population growth. As mentioned in the discussion under Impacts 3.8-1 and 3.8-2, the population growth would not in itself create physical effects to the environment; it could result in secondary or indirect impacts. The result of the increased population would be an increased need for housing in addition to jobs. This would lead to the physical impact of residential and commercial development. The environmental issues associated with increased residential and nonresidential development include land use compatibility, noise, air quality, traffic, biology, water resources, hazardous materials, geology/soils, aesthetics, public services, cultural/archaeological resources, and public utilities. Please see those respective sections of the EIR for a discussion of indirect environmental impacts and mitigation associated with construction of residential and nonresidential development within the City.

In addition to the mitigation measures identified in those respective sections of the EIR, implementation of LU 11, "Non-Residential Growth Management," would serve to manage

growth associated with nonresidential development. The intent of this policy/mitigation measure is to manage the amount and timing of nonresidential development within the City based upon actual residential construction so as to maintain an appropriate balance between jobs and housing in the City. This would help reduce future commuter trips from residential locations outside of the City and County to job locations in Goleta, reduce traffic congestion along US-101 and key intersections in Goleta, reduce deterioration in air quality, and reduce any additional burden on the City's public infrastructure and services. This policy/mitigation would also reduce future residential/population growth compared to a scenario without a growth management policy. The absence of a growth management policy could result in unrestrained job growth, which could lead to increased population growth and increased demand on housing.

Response to Comment A.7-7

The commentator has correctly observed that the reference to Table 3.8-9 on page 3.8-18 should be revised to Table 3.8-7. This change will be made in the FEIR.

Response to Comment A.7-8

The commentator has requested clarification of statements made in Impact 3.8-4. The last sentence of paragraph 2 on page 3.8-18 has been deleted in order to clarify the impact conclusion.

Response to Comment No. A.7-9

The commentator has correctly observed an inaccuracy in the FEMA reference in Section 3.9.1.3. The FEMA website was checked for accuracy, and the correct citation appears in the FEIR.

Response to Comment No. A.7-10

The commentator has requested that the EIR include reference to the Flood Control District's authority over certain creeks and channels in Goleta. The City appreciates the commentator's input regarding the Flood Control District's review and approval authority. The text in Section 3.9.2.2 has been updated for the FEIR.

Response to Comment No. A.7-11

The commentator has correctly observed that restrictions exist regarding the use of recycled water in irrigating private residences. The City recognizes that there are legal restrictions on the use of recycled water for irrigation of private residences. The requirements of policy subsection CE 15.3 would be implemented "where appropriate" and consistent with state law regarding use of recycled water, including any restrictions on the use of recycled water for irrigation at private residences.

Response to Comment No. A.7-12

See response to comment A.7-11.

Response to Comment No. A.7-13

The commentator states that the first sentence in Impact 3.9-4 should be reworded because it is not acceptable to alter existing drainage patterns unless the proposed alterations cause no impact. This is consistent with the intent of the impact discussion, and the impact discussion has been revised in the FEIR.

Response to Comment No. A.7-14

The commentator has requested that a discussion of the Clean Air Plan and Congestion Management Plan be included in the EIR. The discussion of the Clean Air Plan has been included in Section 3.3.2.2 of the FEIR.

Response to Comment No. A.7-15

The commentator suggests splitting Section 3.10, "Land Use and Recreation," into two sections; one for land use issues and one for specific recreation issues. CEQA allows lead agencies to develop standard formats for EIR preparation and allows the EIR to be organized to best fit the decision-making process for which it is prepared. The current EIR format and organization reflects the preferences of the City.

Response to Comment No. A.7-16

The commentator has requested that the EIR include discussion of potential adverse noise impacts from development associated with the GP/CLUP. Text has been added to acknowledge that development within the City may affect noise sensitive land uses in adjacent unincorporated areas.

Response to Comment A.7-17

The commentator is requesting that Section 3.12 include a reference for the Santa Barbara County Flood Control District. This section has been revised to include a reference to the Santa Barbara County Flood Control District.

Response to Comment A.7-18

The commentator states the opinion that Policy PF 4.2(j) will result in new private septic systems as a result of buildout unless the policy is modified to allow for the extension of community sewer in non-urban areas. In response, City staff note that the policy does not preclude new community sewer as long as the new sewer is constructed through existing or planned urban areas. City staff also point out that private septic systems are not the only solution to address wastewater collection, treatment, and disposal.

Response to Comment A.7-19

Refer to response to comment A.17-18.

Response to Comment A.7-20

The commentator states concern that Policy PF 4.2(k) would preclude development in areas where there is no existing sewer infrastructure. The commentator is directed to the last sentence of PF 4.2(k) as the policy allows for new septic systems if it is demonstrated that there

is no feasible alternative. The commentator also notes that the policy does not recognize current treatment technologies that reduce the impact of onsite dispersal of wastewater on the environment. The GP/CLUP does not discourage or preclude alternative treatment technologies and therefore it is unnecessary to list current technologies.

Response to Comment No. A.7-21

The commentator requests that the EIR state that proposed bikeways located along creeks and/or channels maintained by County Flood Control District will be subject to Flood Control review and approval and will be subject to execution of a secondary use agreement. The EIR text in Section 3.13.3.3, Class IV Impacts, has been revised to include bulleted text addressing the commentator's request.

Response to Comment A.7-22

The commentator has requested that the EIR indicate that any development within the Future Service Areas will require more detailed analysis. Comment noted. The EIR text has been amended to include the recommended language.

Response to Comment No. A.7-23

The commentator has requested the development of a policy-based alternative to the proposed GP/CLUP focusing on regional issues. CEQA requires that the DEIR identify a reasonable range of alternatives, but it does not require that the type and extent of environmental impacts identified for those alternatives be substantially different from each other. 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.

The alternatives presented in Chapter 5.0 of the EIR adequately fulfill the CEQA requirements that the analysis evaluate a reasonable range of alternatives. The City does not believe that analysis of an additional, policy-based alternative is warranted. The final GP/CLUP does address regional issues in a cooperative manner with other South Coast jurisdictions, including the County of Santa Barbara

Response to Comment No. A.7-24

The commentator has correctly observed that Alternative 1 is referenced twice. This item has been corrected in the FEIR.

Response to Comment No. A.7-25

The commentator has pointed out that both physical development alternatives could reduce the funding available for new recreation facilities. The requested text has been added to the FEIR.

Response to Comment No. A.7-26

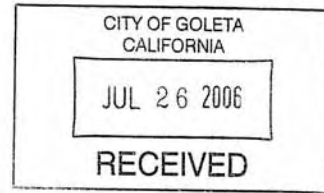
The commentator observes that Alternative 2 would not meet the City's fair share allocation to provide adequate housing and address regional growth. The criteria for alternatives selection identified in CEQA Guidelines section 15126.6(c) states:

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, it Alternative 2 remains the Environmentally Superior Alternative.

7/26/2006 10:54 AM FROM: Fax CAL. DEPT. FISH_GAME TO: 685-2635 PAGE: 001 OF 004

A-8



.....
CAL. DEPT. FISH & GAME

To: **ANNE WELLS**
Fax number: 685-2635

From: **MARTIN POTTER**
Fax number:
Business phone:
Home phone:

Date & Time: 7/26/2006 10:54:43 AM
Pages: 4
Re:

LOCATION: Fax

RX TIME 07/26 '06 11:04

7/26/2006 10:54 AM FROM: FAX CAL. DEPT. FISH _GAME TO: 685-2635 PAGE: 002 OF 004



State of California – The Resources Agency
DEPARTMENT OF FISH AND GAME
<http://www.dfg.ca.gov>
 4949 Viewridge Avenue
 San Diego, CA 92123
 (858) 467-4201

ARNOLD SCHWARZENEGGER, *Governor*

July 26, 2006

Anne Wells
 City of Goleta
 130 Cremona Drive, Ste. B
 Goleta, CA 93117
 Fax No.: (805) 685-2635

**Draft Environmental Impact Report for
 the Goleta General Plan/Coastal Land Use Plan
 SCH # 2005031151, Santa Barbara County**

Dear Ms. Wells,

The Department of Fish and Game (Department), has reviewed the Draft Environmental Impact Report (DEIR) for impacts to biological resources. The City of Goleta (City) proposes adoption of a General Plan and Coastal Land use Plan (Plan) to govern land use and physical development within the approximately 7.9 mi.² City limits, plus five areas of potential growth. The draft of this plan was released on March 20, 2006. Habitat types with the potential to be impacted by implementation of the Plan include coastal sage scrub, eucalyptus woodland, oak woodland, saltwater and freshwater marsh, lakes and ponds, riparian, native and non-native grassland, and coastal dunes. Most of these habitats are designated Environmentally Sensitive Habitat Areas (ESHAs) in the Plan. Wildlife with the potential to be impacted by the project includes 43 species of threatened, endangered, and other special status plants and animals. Measures proposed to mitigate impacts to habitats and species primarily involve the protection of ESHAs covered in the 36-page Conservation Element section of the Plan.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines §15386(a)) and pursuant to our authority as a Responsible Agency (CEQA Guidelines §15381) over those aspects of the proposed project that come under the purview of the Fish and Game Code Section 1600 et seq. The Project as proposed has the potential for adverse effects, either individually or cumulatively, on wildlife (as defined in Section 711.2 of the Fish and Game Code), and therefore does not qualify for a filing fee exemption under 14 CCR §753.5 (c).

A.8-1

Mitigation Measures

The Plan is thorough in identifying ESHAs by mapping areas previously designated ESH by the Coastal Commission, and designating additional ESHAs based on habitat type. However, the Department has concerns about how mitigation would be determined and implemented for impacts to ESHAs.

A.8-2

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Ms. Anne Wells
 July 26, 2006
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The Department firstly is concerned about the ability to mitigate for certain habitat types. For example, there is a lack of viable wetland mitigation areas within the City's sphere of influence or within the Goleta and Devereux Slough watersheds in which the City lies. It took over ten years to find a potential mitigation site for the loss of the Los Carneros Wetland north of Hollister Avenue. Restoration efforts have not yet begun for wetland habitat lost in the early 1990s. Wetland habitat loss should therefore be minimized or completely avoided.

A.8-3

Secondly, the Plan relies on the open ended term "fully mitigate" as the primary mitigation strategy for impacts to ESHAs that cannot be avoided. Unless the City is going to describe in detail what this term means there is no assurance that impacts to ESHAs will be mitigated to a level of insignificance. In order to fully mitigate impacts the Plan needs to provide details on how both spatial and functional impacts to ESHAs will be resolved.

A.8-4

The Department therefore recommends adding language to Conservation Element Policy CE 1.7 to quantify the requirement to fully mitigate impacts to ESHAs, so that a minimum 1 acre of habitat would be replaced/restored for every acre of ESHA lost or severely degraded by development. This replacement ratio should be higher for the loss or degradation of some ESHAs (e.g., oak woodland at 3:1) or for off-site or out-of-kind mitigation. We believe the addition of such language will help reduce confusion over the interpretation of the phrase "fully mitigate."

A.8-5

The 1:1 replacement/restoration ratio used as a minimum we believe is important to achieve the draft CP/CLUP Guiding Principle and Goal #1; to "Protect, maintain, and enhance natural ecosystem processes and functions in Goleta and its environs in order to maintain their natural ecological diversity." Used as a minimum, the 1:1 ratio also will allow flexibility to address changing conditions over time.

A.8-6

In addition, the City should identify means to help further quantify the amount of habitat needed to provide functional mitigation. Two such possibilities are the Army Corps of Engineers' Functional Habitat Assessments Methodology and the Southern California Wetlands Recovery Project's California Rapid Assessment Method (CRAM). Though both these methods focus on wetland habitat a similar effort should be undertaken for upland ESHAs.

A.8-7

Tree Removal

The City proposes in the DEIR to mitigate the loss of native trees (oaks, sycamores, etc.) by implementing Plan Conservation Element Policy CE 9.5, which stipulates replacement at a 10:1 ratio. No such mitigation is proposed for the loss of non-native trees, however.

A.8-8

The Department's position is non-native trees have wildlife value, and their loss should therefore be mitigated. In order to adequately mitigate the loss of non-native trees, the Department recommends a replacement ratio of 2:1. The Department discourages the planting of non-native trees. Non-natives can have undesirable impacts on local wildlife populations, and there is some evidence that eucalyptus can have negative impacts to foraging bird species. We therefore recommend the replacement trees be native sycamore, oak, or other large native tree species. To

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ensure long-term survival, trees should be monitored, nurtured, and protected within the dripline so they survive for a minimum of 5 years.

A.8-9

Impacts to Nesting Birds

All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.

A.8-10

The City proposes in the DEIR to mitigate impacts to nesting birds by implementing Plan Conservation Element Policy CE 8.4 - Buffer Areas for Special-Status Species. Policy CE 8.4 would require a 100-foot buffer around active and historical nest sites for protected species of raptors when feasible, and a 300-foot buffer around active raptor nests during construction activities. The Department, however, recommends construction activities take place outside of the breeding bird season (February 1- August 15) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). If avoidance is infeasible, the Department recommends a minimum 500 foot buffer for all active raptor nests.

A.8-11

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Martin Potter, Wildlife Biologist, at (805) 640-3677.

Sincerely,

Larry L. Eng, Ph.D.
Regional Manager
South Coast Region

cc: Ms. Morgan Wehtje
Department of Fish and Game
Camarillo, California

Mr. Martin Potter
Department of Fish and Game
Ojai, California

Mr. Scott Morgan
State Clearinghouse
Sacramento, California

LOCATION:Fax

RX TIME 07/26 '06 11:04

Response to Comment No. A.8-1

The commentator advises that the project does not qualify for a filing fee exemption under 14 CCR §753.5(c). Comment noted. No other response is required.

Response to Comment No. A.8-2

The commentator expresses concern about implementation of mitigation measures for ESHAs. 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).

Response to Comment No. A.8-3

See response to comment A.8-2.

Response to Comment No. A.8-4

See response to comment A.8-2.

Response to Comment No. A.8-5

See response to comment A.8-2.

Response to Comment No. A.8-6

See response to comment A.8-2.

Response to Comment No. A.8-7

See response to comment A.8-2.

Response to Comment No. A.8-8

The commentator has requested mitigation measures for the removal of nonnative trees. Under the City's GP/CLUP policies and Environmental Thresholds Manual, impacts to nonnative trees would not be considered potentially significant unless the trees qualify as an ESHA, such as eucalyptus groves with values for monarch butterflies or raptors. CEQA does not require a discussion of mitigation measures for impacts that are not potentially significant.

Response to Comment No. A.8-9

See response to comment A.8-8.

Response to Comment No. A.8-10

The commentator has requested that the EIR address impacts to birds and their active nests. The EIR addresses impacts to nesting birds, including raptors, in terms of potential for direct

harm and loss or degradation of foraging, nesting, and roosting habitat. Mitigation identified for potentially significant impacts include CE 1.9h, which requires that “the timing of grading and construction activities shall be controlled to minimize potential disruption of wildlife during critical time periods such as nesting or breeding seasons.”

Response to Comment No. A.8-11

See response to comment A.8-10.

STATE OF CALIFORNIA, RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, GOVERNOR



STATE MINING AND GEOLOGY BOARD

DEPARTMENT OF CONSERVATION

801 K Street • Suite 2015 • Sacramento, California 95814



PHONE: 916 / 322-1082 • FAX: 916 / 445-0738 • TDD: 916 / 324-2555 • INTERNET: conservation.ca.gov/smg

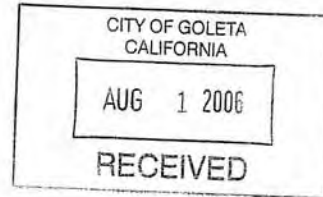
ALLEN M. JONES, CHAIR
ROBERT GRIEGO, VICE CHAIR

JULIAN C. ISHAM
SEENA HOOSE
CHERYL BLY-CHESTER

ERIN GARNER
ROBERT TEPEL

July 21, 2006

Anne Wells, Senior Planner
Planning and Environmental Services
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117



RE: City of Goleta's General Plan / Coastal Land Use Plan Draft EIR – Mineral Resource Management Policies

Dear Ms. Wells:

We are in receipt of your May 31, 2006, letter announcing the public review period for the review of the City of Goleta's General Plan / Coastal Land Use Plan Draft EIR – Mineral Resource Management Policies. While we realize that the comment period has formally closed, the purpose of this letter is to alert you that the Goleta General Plan is one of several scheduled for discussion at the next regularly scheduled business meeting of the Minerals and Geologic Resources Committee of the State Mining and Geology Board (SMGB) on September 14, 2006, in San Jose, California. You will be sent an agenda indicating the specific time and location approximately ten days prior to the meeting. A staff report will be sent to you about one week prior to the meeting.

A.9-1

We are currently in the process of reviewing that plan and will contact you if we have any questions. An initial review of the plan indicates that the inclusion of Mineral Resource Management Policies, in accordance with the requirements of the Surface Mining and Reclamation Act (SMARA, Public Resources Code Section 2710 et seq.), appears to have been overlooked. In those Policies, reference should be included to the most recent mineral classification report submitted to the City in 1989 entitled, *Mineral Land Classification of Portland Cement Concrete Aggregate and Active Mines of all other Mineral Commodities in the San Luis Obispo – Santa Barbara Production – Consumption Region, CGS Special Report 162*.

A.9-2

Mission of the State Mining and Geology Board is to Represent the State's Interest in the Development, Utilization and Conservation of Mineral Resources; Reclamation of Mined Lands; Development of Geologic and Seismic Hazard Information; and to Provide a Forum for Public Redress

City of Goleta's General Plan
July 21, 2006
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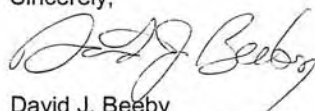
While that report is included in your reference list at the end of the General Plan, its contents or findings were not mentioned in Section 3.6 (Geology) of the General Plan. At the time of the CGS report, at least one significant deposit of specialty sand was actively being mined at the Elwood Ranch Quarry within the jurisdiction of the City of Goleta. The mineral deposit being quarried was zoned MRZ-2 by the State Geologist and requires reference and recognition in the Goleta General Plan, even if that mine is no longer active. Additionally, the database of the State Office of Mined Land Reclamation indicates that the Parks Sand Pit (California Mine ID number 91-42-0004) lies within the jurisdiction of the City of Goleta and remains active. If this is not a new operator of the same mine active in 1989, the deposit being mined should also be recognized in the General Plan.

A.9-3

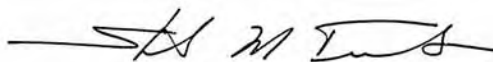
A.9-4

Thank you for the opportunity to review Goleta's General Plan. If you have any questions, please do not hesitate to contact us at the SMGB office in Sacramento at (916) 322-1082.

Sincerely,



David J. Beeby
Supervising Geologist



Stephen M. Testa
Executive Officer

Response to Comment No. A.9-1

The commentator has advised that the GP/CLUP will be discussed at a future meeting. No additional response is requested.

Response to Comment No. A.9-2

The commentator suggests that inclusion of SMARA Mineral Resource Management Policies may have been overlooked in the GP/CLUP. Although the discussion of GP/CLUP policies does indicate that there are no known significant mineral resources in the City (DEIR, page 3.6-7), text will be added to the “Existing Conditions” discussion of mineral resources.

Response to Comment No. A.9-3

The commentator notes that the contents and findings of CGS Special Report 162 were not mentioned in Section 3.6 of the GP/CLUP. The commentator suggests that at least one significant deposit of specialty sand was actively being mined at the Ellwood Ranch Quarry within the City. A reference to the mineral land classification report will be added to “Existing Conditions” (see response to comment A.9.2). The Elwood Ranch Quarry is located outside the City limits (i.e., in the County). No mineral resources are being mined in the City limits. No other change is needed to the EIR.

Response to Comment No. A.9-4

The commentator suggests that the Parks Sand Pit lies within the City and remains active. The Parks Sand Pit is also located outside the City limits. No change is needed to the EIR.