



October 30, 2015

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Santa Barbara Airport
City of Santa Barbara, Planning Division
Attn: Andrew Bermond, AICP
P.O. Box 1990
Santa Barbara, CA 93102-1990

**RE: Draft Program EIR on the Proposed Airport Master Plan
(SCH#: 2014061096)**

Dear Mr. Bermond:

The City of Goleta (City) has reviewed the Draft Program Environmental Impact Report on the Proposed Airport Master Plan (SCH#: 2014061096) (DEIR). We appreciate this opportunity to provide comments to the Santa Barbara Airport, particularly in light of the fact that Goleta, a mostly built-out City, is uniquely influenced by the City of Santa Barbara's airport and proposed future growth. Based on our review of the DEIR, we have identified outstanding issues which require correction, clarification, and/or further analysis to ensure that the Final Environmental Impact Report (FEIR) provides adequate environmental analysis, as required by law. The City's comments regarding the adequacy of the DEIR are expressed below and in the attached comment table.

1. Scope of the Project

An accurate project description is necessary to determine the scope of environmental review under CEQA. The proposed project boundary is unclear, undefined, and is not sufficiently detailed or mapped to allow for adequate environmental analysis. While the DEIR analysis focuses on development within the Airport boundary south of Hollister Avenue, the project description includes removal of the long term parking lot north of Hollister Avenue and avigation easements to the north and south of the airport.

2. Treatment of the Adopted 1997 Industrial Specific Plan in the DEIR

The DEIR's project description fails to include the corresponding amendments to the 1997 Santa Barbara Airport Industrial Area Specific Plan (Specific Plan). The Specific Plan guides development both North and South of Hollister Avenue and includes some but not all of the Santa Barbara Airport. The DEIR project description (and proposed Master Plan) alters growth within the Specific Plan boundary and would be inconsistent with the Specific Plan without a corresponding Specific Plan amendment. The DEIR project description must disclose the conflict between the proposed Master Plan and the adopted 1997 Specific Plan and include the content of the Specific Plan amendment(s) that is required to achieve consistency. The DEIR must fully analyze the impacts associated with the Specific Plan amendments that are required for project description consistency with an existing, adopted plan.

3. Inconsistency between Project Description and Impact Analysis

The DEIR project description identifies future airport growth, such as increased enplanements, that are not evaluated in the environmental analysis. The impacts of these increase enplanements must be considered in the impacts analysis as the proposed project and increased enplanements are connected. The DEIR project description includes improvements that are intended to satisfy aviation demand but also serves to support future aviation demand. Examples of these improvements include relocated and enlarged Fixed-Base Operations facilities, increased and more convenient parking options, and the expansion of terminal facilities. As such, full environmental analysis of all future airport growth, including increased enplanements and related vehicle traffic, must be evaluated in the DEIR.

4. Inadequate Transportation Analysis

As detailed in the comments in the attached table, the DEIR inadequately analyzes transportation impacts associated with the proposed project. These comments are intended to support a more thorough evaluation of the trip generation as a result of the proposed project, related impact evaluation, and mitigation.

5. Inadequate Biological Resources Analysis

The extension of Runway H is located within sensitive wetland habitat. The DEIR incorrectly classifies the loss to wetland habitat as Class II. Instead, this must be identified as a Class I impacts to reflect loss of protected habitat. Additionally, the existing setting includes updated habitat boundaries. We have concern regarding the timing of the habitat surveys conducted as part of the DEIR as the single survey occurred during the dry season in drought conditions.

DEIR Impact BIO-1 should not simply be limited to jurisdictional wetlands. All wetlands, habitat, and unique Goleta Slough biological resources must also be considered in this impact or in another new impact.

The DEIR heavily relies on the Programmatic Wetland Restoration Plan (PWRP) to mitigate the destruction of wetlands. Without including the PWRP for review, there is no justification for the assumption that this mitigation can reduce Impact BIO-1 to less than a Class I impact. The PWRP should be included with the DEIR to better understand the mitigation envisioned. However, even if the PWRP is produced so as not to constitute a deferred mitigation, this document cannot mitigate the destruction of wetlands and biological resources to any less than a Class I impact.

5. Inadequate Alternatives Analysis

An EIR must present a reasonable range of alternatives that could feasibly attain most of the project's objectives but avoid or substantially lessen the proposed project's significant effects (CEQA Guidelines § 15126.6(a)). Analyzing only one single alternative is inadequate. Additional alternatives need to be analyzed.

The DEIR provides an insufficient range of alternatives for a reasonable discussion and consideration of other Draft Master Plan concepts that could attain some or all of the project objectives. The only alternative outside of the no-project includes only a slight deviation from the project description. This alternative is insufficient to provide a meaningful comparison and does nothing to mitigate the only Class I impact identified in the DEIR.

Additionally, the DEIR does not provide sufficient information for a decision-maker to make a statement of overriding considerations. There is little to no detail included in the DEIR as to the safety improvements provided due to the Draft Master Plan concept. As more detailed in the attached comment table, additional supporting material must be included in the CEQA document in order to provide justification for the conclusion that the environmentally superior alternative would not meet the project objective of improved safety.

6. Other Analysis Flaws

The City of Santa Barbara acknowledges that sea level rise resulting from climate change will increase the frequency and severity of storm-related flooding, posing increased future risk to the Santa Barbara Airport (see the Santa Barbara Climate Action Plan). However, the DEIR fails to identify and analyze this issue, despite the Airport's location in a slough, which already renders it highly vulnerable to naturally occurring events, including storms and extreme high tides. Given that the Project includes new and increased development in the floodway and the entirety of the Project is within the 100-year floodplain, the DEIR's failure to discuss the physical impacts associated with future sea-level rise is a glaring omission in the document.

Thank you for considering the City's comments regarding the DEIR, as presented in this letter and in the attached table. If you have any questions regarding our comments, don't hesitate to contact me at 805-961-7557.

Sincerely,



Anne Wells
Advance Planning Manager

Attachment: Comment Table

cc: Michelle Greene, City Manager
Rosemarie Gaglione, Public Works Director
Jennifer Carman, Planning & Environmental Review Director

Attachment 1
City of Santa Barbara Proposed Airport Master Plan Draft Program EIR
City of Goleta Comments

Number	DEIR Reference	Draft EIR Comment
Executive Summary		
1	ES-3-4.	There is no mention of the Airport Industrial Specific Plan in the <i>Required Discretionary Actions and Other Agency Approvals</i> section. The March 20, 2012 staff report on for the Airport Master Plan Initiation clearly states that adding the Aviation Facilities Zone to the Master Plan area, which the Draft Master Plan appears to do, would require amendments to the Airport Industrial Specific Plan, the Local Coastal Plan, and the Airport Zoning Ordinance. These amendments must be discussed and analyzed throughout the CEQA document.
2	ES-8-13, Tables ES-2 and ES-3	The two tables in the Executive Summary provide a title for each Impact analyzed in the DEIR. These titles are not provided in Chapter 4 of the DEIR. In Chapter 4, each impact is discussed, but the actual impact is never written out in the same way it is in the Executive Summary. This provides confusion as to what actual impact is being discussed and analyzed. The reviewer of the document should not have to rely on the Executive Summary for this information.
3	ES-13	The DEIR states that the project “would not foster economic or population growth and is not considered growth-inducing.” Consequently, the DEIR only considers impacts associated with changes in the Airport layout, not with the increased operations predicted in the Draft Master Plan. As stated in the City of Goleta’s comment letter, this approach is inadequate. Growth-inducing development included in the Draft Master Plan, including increased terminal space, improved parking, and enlarged and new FBO sites, must be analyzed within the DEIR and the associated impacts must be fully considered and mitigated.
Chapter 1 Introductory Information		
4	1-2, 2-2.	What does “moderate growth” at the airport in the City of Santa Barbara General Plan EIR mean? With no explanation, there is no way to evaluate whether the analysis done in the General Plan EIR is sufficient to tier off of in the DEIR.
5	1-3	In a letter dated July 30, 2014, the City of Goleta requested that an analysis of noise impacts be included in the DEIR. The City again makes this request. The noise contours surrounding the airport clearly increase over the lifetime of the proposed project. In the Initial Study, there does not appear to be any discussion of the extension of Runway 15L. Presumably, this extension will lead to extended noise contours. Additionally, The Initial Study dismisses any project related impact on the noise contours by stating that the larger noise contours in 2032 a result of overall growth occurring at the Airport and not as a result of future projects (Appendix A-40). When considering the increased planes in Table 1 (Appendix A-90), it is hard to imagine how the improvements to the terminal and to the FBO sites will not induce this growth in the Operational Fleet Mix. The DEIR should not simply ignore this resultant growth and the consequent increase in noise impacts to the areas surrounding the Airport. Rather than enjoying a benefit of decreased plane noise in the future, Airport neighbors will experience similar noise levels because of the Airports actions to increase larger fleet operations. Additionally, the Initial Study seems to focus on long-term noise associated with take-offs and landings. Consideration of operational impacts due to the re-configured north aviation are must also be considered.

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6	1-3	<p>In a letter dated July 30, 2014, the City of Goleta requested that an analysis of visual impacts be included in the DEIR. The City again makes this request. The proposed project includes the addition or expansion of several structures close to the boundary with the City of Goleta and an eight-foot high chain link fence along South Fairview Avenue.</p> <p>In the Initial Study, p.A-21 of the DEIR, there is a presumptive statement that “[n]one of the projects would have a substantial adverse effect on the scenic views or resources.” It is unclear how this conclusion was reached. Without a detailed analysis in the DEIR, the presumption that there is no impact on Scenic View and Scenic Highways is indefensible.</p>
Chapter 2 Project Description		
7	General	<p>The DEIR must include a clear geographic scope for the Master Plan in the Project Description. The DEIR appears to focus on development within the Airport boundary south of Hollister Avenue. However, there are project components, like the removal of the long term parking lot north of Hollister Avenue and aviation easements that fall outside of this area and in some cases outside the jurisdiction of the City of Santa Barbara. The DEIR and Master Plan must make the geographic scope of the project clear in the Project Description and must limit project components to this area.</p>
8	General	<p>The DEIR must include a new Exhibit 2A depicting the boundaries for: the Santa Barbara Airport, the City of Santa Barbara, the City of Goleta, the 1997 Santa Barbara Airport Industrial Area Specific Plan (Specific Plan), and the proposed Master Plan so it is clear how the various boundaries overlap with the proposed Master Plan. Without this information, it is not possible to accurately analyze the impacts of the proposed project.</p>
9	General	<p>Four parcels east of Fairview Avenue and north of Hollister Avenue (APNs 073-080-032, -005, -030, and -023) are located within the jurisdiction of the City of Santa Barbara, immediately adjacent to an Old Town neighborhood in the City of Goleta. The DEIR project description and proposed Master Plan do not address future growth or possible changes to these four parcels. Because the parcels are not included in the 1997 Specific Plan, the DEIR should clarify what planning document guide the land use and zoning for these parcels and whether or not growth or changes will occur within these four parcels. Further, the DEIR should evaluate the related effects of any changes.</p>
10	2-1	<p>The project objectives are too narrowly constructed so as to provide no feasible alternative that will meet the objectives stated.</p>
11	2-2	<p>The sentence that reads “The City’s General Plan considers ‘moderate growth’ at the Airport. The above forecasted growth projections fall within the City’s General Plan assumption for the Airport.” must be removed. This statement has nothing to do with the project description. Rather, this statement is related to the analysis of project impacts. As such, this statement does not belong in Chapter 2.</p>
12	2-4, Exhibit 2B	<p>The DEIR must include what will happen with the current Maintenance Yard once the new Maintenance Yard is established. Exhibit 2B of the DEIR and 6A of the Draft Master Plan identify the current Maintenance Yard as a Proposed Airport Revenue Parcel. This use will increase traffic, have biological impacts, and potentially create</p>

Number	DEIR Reference	Draft EIR Comment
		aesthetic impacts. As such, the used of this area must be discussed and the impacts adequately analyzed.
13	Exhibits 2B–2E	In the DEIR, the pink border around the Airport property should be changed to be City border, not just Airport Property line. This more clearly represents the various jurisdictions impacted along this border.
14	Exhibits 2B–2E	Exhibit 2E includes a floodway layer which helps in understanding the development and removal of development in the floodway. This floodway layer should be included in all Exhibits to better understand the impacts of the Draft Master Plan.
15	Exhibit 2B, 2C, and 2E	The size of the Proposed Paved Islands is not the same in the various exhibits. This inconsistency is also true of the Draft Master Plan. Please reconcile.
16	Exhibit 2B and 2C	It is unclear why the abandoned pavement at the eastern end of Runway 7-25 as shown in the Draft Master Plan Exhibit 4C is not included elsewhere in the Draft Master Plan or the DEIR. The abandoned pavement is also included in the FAA approved Airport Layout Plan and the legend identifies that this pavement will be removed. The Draft Master Plan and DEIR must be updated to reflect this change and the impacts of the removal must be included in the impacts analysis throughout the DEIR.
17	Exhibit 2C	The legend for this Exhibit includes a Proposed Class 1 bikepath. However, this is not clearly shown on the map. Please clarify and mark as appropriate.
18	Exhibit 2E	Reference to the closure of the parking lot north of Hollister Avenue should be removed as this area appears to be outside the geographic scope of the Draft Master Plan.
19	2-5	Discussion and analysis of the closure of Long Term Lot 2 should not be included in the Project Description. This area appears to be outside the geographic scope of the Master Plan and any reduction in use is speculative as the parcel may be used for another use in the future.
20	2-5	The project description does not include discussion of a new restaurant/conference center where the existing Airport administration building is located. In order to be consistent with the Draft Master Plan, this element of the proposed project must be included in the DEIR. Additionally, the impacts of this part of the proposed project, including visual and transportation impacts must be thoroughly analyzed.
21	Exhibit 2E	Exhibit 2D of the Draft Master Plan and Exhibit 2E of the DEIR are meant to show the same, North Landside Development Concept. However, there are multiple discrepancies between the concepts. Please reconcile.
		Chapter 3 Project Alternatives
22	3-5	The DEIR notes that the No-Project Alternative would result in the Airport's inability to accommodate the project aviation demands of the service area. Consequently, the DEIR must acknowledge that the proposed project is in fact growth inducing. Without the planned improvements at the airport, the growth would not occur.
23	3-6	The DEIR must further explain why the Environmentally Superior Alternative does not remedy Taxiway Hot Spot #1. See comment below for further details.
		Chapter 4 Environmental Conditions, Impacts, and Mitigation
24	General	The structuring of the impacts analysis is confusing and makes review difficult. There are several instances when one "impact" is actually several. For instance, Impact HYD-2 includes "Result HYD-2" which is actually three separate impacts. Each of these three impacts should be numbered separately. Additionally, the

Number	DEIR Reference	Draft EIR Comment
		document must make clear which mitigation measures apply to each impact. Again, looking at HYD-2, the third HYD-2 impact refers to mitigation yet nowhere in that paragraph is the specific mitigation cited or explained. Only two pages later are hydrology and water quality impacts explained, but there is no cross-reference as to what or which impacts they apply. The only place this information is provided is in the Executive Summary and that is not sufficient.
Chapter 4.1 Air Quality/Greenhouse Gas Emissions		
25	4-12, AQ-4	The DEIR must explain more clearly how the Draft Master Plan conforms to the City of Santa Barbara's adopted Climate Action Plan. Result AQ-4 states the Draft Master Plan is consistent with the City's Climate Action Plan. However, the Draft Master Plan and DEIR do not include Strategy 6 of the Climate Action Plan, which calls for a solar photovoltaic project at the Airport located within the long-term parking lot. The date for the implementation of this measure in the Climate Action Plan is 2015. Consequently, this project should be included in the Airport Master Plan. Without the inclusion of the solar project in the Master Plan, a finding of consistency with the City's Climate Action Plan cannot be made.
Chapter 4.2 Biological Resources		
26	4-34, BIO-1	There is no need to be speculative about the spatial extent of impacts due to the extension of Taxiway M. Exhibit 2D clearly lays out the area that will need alteration for the extension of the Taxiway. This disturbed area should be calculated and included in the DEIR analysis.
27	4-34–35	Impact BIO-1 clearly impacts wetlands. The areas disturbed due to the extension of Taxiway H will clearly and irrevocably damage wetlands and significant habitat. The recent survey work is insufficient to suggest the impacted areas are not, or even potentially not, wetlands. A more comprehensive survey of habitats, species, and wetlands must be done over several years and seasons to better understand the impacts associated with the proposed new development. Without this information, BIO-1 must be a Class I impact.
28	4-37–40, BIO/mm-1.	BIO/mm-1 is a critical mitigation measure. The Programmatic Wetland Restoration Plan should be included as an appendix to the DEIR. This Plan must be completed prior to approval of the Master Plan and Certification of the Final EIR (p. 7-3). Consequently, the Plan should be included so that the ability of the Plan to mitigate BIO-1 to Less Than Significant can more accurately be analyzed.
Chapter 4.3 Cultural Resources		
29	4-54, Impact CR-3	The DEIR must include more details about the sensitivity maps and screening process contained in the Master Archaeological Resources Assessment for the Santa Barbara Municipal Airport (MARA). Without these maps and details being provided in the DEIR, it is not possible to assess the ability of CR/mm-2 to mitigate the impacts of CR-3.
Chapter 4.4 Geology and Soils/Hazards and Hazardous Materials		
30	4-61, Impact G/HAZ-2	The soils in this area have been mapped in Santa Barbara General Plane EIR as having a liquefaction potential (page 8-7). This information must be included and considered in the analysis of this impact.
31	General	Details about the increased gas storage at the fuel farms at the Airport must be provided in the DEIR and the

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		increased risks associated with storing that material must be considered in this section.
		Chapter 4.5 Hydrology and Water Quality
32	4-73, HYD-2	<p>The proposed project includes development in multiple areas within the floodway (including the new taxiway along Runway 7-25 and the enlargement of the fuel farm northeast of the runways) and considerable development and redevelopment within the 100-year floodplain. These impacts, as identified in HYD-2, clearly rise above a Class III, Less than Significant Impact. Adherence to Chapter 22.24, Flood Plain Management of the Santa Barbara Municipal Code may help to mitigate some of these impacts, but they do not change the fact that these are significant impacts.</p> <p>In particular, the enlargement of the fuel farm within the floodway could have catastrophic impacts to hydrology and water quality that must be fully analyzed and mitigated.</p>
33	4-76, HYD/mm-1	The DEIR should include an in depth discussion of sea-level rise and how the Airport can adequately mitigate the impacts associate with sea-level rise. Deferring this analysis to a later date fails to provide the necessary overarching mitigation to this critical issue at the Airport. It should be noted that in the City of Santa Barbara's Climate Action Plan, the City expected the new "Airport Facilities Plan" to study, not just defer, climate studies including sea level rise.
34	4-76, HYD/mm-1	HYD/mm-2 will have impacts elsewhere that must be considered. In order to reduce flooding at the Airport, that water must go elsewhere. The DEIR must include consideration of this externality if HYD/mm-2 is to be used to mitigate a significant impact of the project.
		Chapter 4.6 Land Use and Planning
35	4-87	Impact LU-2 is titled "Compatibility with applicable General Plan policies and other City plans" in Table ES-2. However, in the discussion of Impact LU-2, the Airport Industrial Specific Plan is not mentioned, discussed, and consistency with that Plan is not analyzed. Without that analysis, a determination that LU-2 is a Class III impact cannot be made.
36	4-87	Impact LU-2 includes consistency with the City of Santa Barbara's Climate Action Plan. In order for this impact to be a Class III impact, the DEIR must clarify how the Draft Master Plan is consistent with the City's Climate Action Plan. This is particularly the case given that the Draft Master Plan does not include several reduction efforts that are included in the City's Climate Action Plan. These include a centralized location for the terminal and fixed-base operations at the Airport (see p. 2-19 of the Climate Action Plan). Additionally, in the Climate Action Plan, reduction measure 7 is a solar photovoltaic project at Airport's long-term parking lot (see p. 2-25 of the Climate Action Plan). This project is not included in the Draft Master Plan. If the Master Plan is to be in conformance with the Climate Action Plan, and therefore not a Class I impact, the Master Plan must include a solar project for the long-term parking area.
37	4-89-90	The DEIR states a three-part test for airfield safety projects resulting in wetland impacts. The third part of the test is that "the expansion is necessary to <i>maintain existing</i> capacity." However, the DEIR conclusion to the discussion of the three-part test references increased efficiency and that the improvements "would not <i>increase</i>

Number	DEIR Reference	Draft EIR Comment
		the operational capacity of the Airport.” (emphasis added). The discussion pivoted from analyzing whether the improvements are necessary to maintain existing capacity to whether it would increase capacity. These are two separate things. Without explaining how the third part of the three-part test can be shown for the runway extension into a wetland, the determination of LU-3 as a Class II rather than a Class I impact cannot be made.
38	4-95	<p>In order to conclude that LU-4 is a Class II impact, a much more comprehensive analysis of the City of Santa Barbara General Plan, Airport Zoning Regulations, and the Airport Industrial Specific Plan must be done. As stated above, compatibility with development in wetlands must be compatible with the City of Santa Barbara’s G-S-R zoning designation. Currently, the DEIR fails to exhibit this compatibility and therefore a determination that LU-4 is a Class II rather than Class I impact is unsupported.</p> <p>In terms of the Airport Industrial Specific Plan, the DEIR must include a thorough consideration of the policies included in that plan. Simply stating that “[n]o issues with the Specific Plan #6 overlay as a result of the recommended development are anticipated,” is not a sufficient analysis to determine that LU-4 is a Class II rather than Class I impact.</p>
Chapter 4.7 Public Utilities (Solid Waste Disposal)		
39	4-100	The Draft Master Plan includes a new lavatory dump station in the southeastern portion of the Airport Property. This additional lavatory dump station constitutes a new or expanded waste treatment or collection facility. The impacts of this development, including issues related to potential flooding, must be included in the DEIR.
Chapter 4.8 Transportation/Traffic		
40	4-112	The DEIR briefly mentions the Santa Barbara County Congestion Management Program (CMP) but provides little in the way of analysis in terms of the CMP. The DEIR must include a more thorough discussion of the CMP and determine whether the proposed project triggers compliance with the CMP. The brief references to the CMP are insufficient.
41	4-118	The DEIR must clarify why projects identified in the Draft Master Plan are not considered to have a potential impact on traffic. These include the addition of four new revenue support parcels and two 15-unit T-hangars on the western side of the north aviation area and a new restaurant/conference center on the eastern side of the north aviation area. In the entirety of the proposed project, the traffic impacts associated with these new facilities need to be considered and analyzed.
42	4-119, 4-120, Table 4R	The DEIR includes cumulative projects provided by the City of Goleta. However, the DEIR does not include other projects within the vicinity that are proposed by the City of Santa Barbara. These include the Direct Relief International Project and other planned developments in the Airport Industrial Area. While including City of Goleta projects are important to the cumulative impacts analysis, the City of Santa Barbara must also include their own projects in order to properly understand cumulative impacts in the project vicinity. All other cumulative projects in the proposed project vicinity should be treated in the same manner and all should be included in Table 4R and their resultant trips included in the project’s traffic analysis.

Number	DEIR Reference	Draft EIR Comment
43	4-120	The DEIR assumes Ekwill and Fowler Road extensions by 2022. While analyzing project and cumulative impacts with these road extensions is helpful, additional analysis must be included in the DEIR. Because the road extensions have not completed the approval process and the City of Santa Barbara has raised the concern that locating the roundabout within the RPZ may be inconsistent with the revised 2012 FAA guidelines, the Airport must include a traffic analysis without those road extensions and re-analyze traffic impacts based on these potential future conditions.
44	4-125–130.	<p>The DEIR explores several possible mitigation measures to address the Class I impact for T-3: Cumulative impacts to traffic and circulation in the long-term (2032) but did not include any for various reasons, including the need for the City of Goleta to implement the projects. However, there are other potential mitigation measures that the City of Santa Barbara could implement. These include diverting traffic entering Hollister Avenue from Airport roads west on to Hollister and therefore diverting drivers away from the impacted intersections. Additionally, the City of Santa Barbara should assess an overpass/on-ramp within the City of Santa Barbara controlled Airport Industrial Area. This would serve to alleviate impacts to City of Goleta intersections. Finally, a mitigation measure providing shuttle/bus service between the Amtrak Station and the Airport Terminal should be considered. This mitigation may help to offset the need for car trips to the airport, thus alleviating the impacts to City of Goleta intersections.</p> <p>Simply stating that there are no possible mitigations to the Class I impact is unacceptable.</p> <p>Additionally, the DEIR notes that the Airport will pay a fair-share allocation for future intersection improvements based on the City of Goleta’s traffic mitigation fees (p. ES-8). The agreement to pay a fair-share should be included as a mitigation measure for Impact T-3. This agreement with the City of Goleta can establish how the City of Santa Barbara can help mitigate their Class I impact.</p>
Chapter 5 Other CEQA		
45	General	This Chapter must be updated based on the comments provided in the City of Goleta’s letter and this comment table. Updates include but are not limited to an updated of the effects found not to be significant, the unavoidable significant environmental effects, the discussion of growth-inducing impacts, and the cumulative impacts of the project.
Chapter 6 Summary of Alternatives Analysis		
46	6-3	Section 15126.6(a) of CEQA requires a “range of project alternatives for examination.” However, the DEIR only includes one alternative, excluding the No-Project Alternative. This does not provide a reasonable range of alternatives to consider other ways to achieve some or all of the project objectives. This is especially true considering the only other alternative analyzed is identical in almost all ways to the proposed project.
47	6-3	The DEIR must consider alternatives that lessen significant impacts of the project. The current DEIR identifies cumulative traffic impacts (Impact T-3) as the only Class I impact. Consequently, there must be

Number	DEIR Reference	Draft EIR Comment
		an alternative that lessens this impact. Currently in the DEIR, there is no alternative except the no-project that does this.
48	Table 6A, Page 6-5	In the Transportation/Traffic section of the Table, it is unclear why the rows for Impacts T-2 and T-3 include reference to construction traffic. Construction traffic should be included as a separate short-term impact.
49	6-5-6	When discussing the DEIR, the environmentally superior alternative is described as not accommodating future airport operations in a safe manner. The DEIR specifically references the FAA safety “hot spot” for this conclusion. It appears that this mention is referencing Hot Spot #1 from Exhibit 4C of the Draft Master Plan. The Draft Master Plan describes as follows: “Pilots are sometimes confused by the angle at which Taxiway C intersects Runway 7-25.” (p. 4-8). The Draft Master Plan further describes the recommendation for the taxiway extension from the FAA Local Runway Safety Action Plan for the Airport (Action Plan). The City of Goleta would like to see this Action Plan included as an appendix to the DEIR. This would provide clearer details on the necessity of the taxiway extension to address safety and circulation issues, including remedying Hot Spot #1. Not only will the Action Plan provide helpful additional information, but this document may help the City of Santa Barbara in their necessary statement of overriding considerations.
Appendices		
50	Appendix F	The City of Goleta has several concerns about the methodology and analysis of traffic impacts included in Appendix F: Traffic Impact Study. Specific comments are provided below. Without a thorough and sound traffic analysis, the impacts of the Draft Master Plan on Goleta intersections cannot be accurately or adequately analyzed.
51	F-6	A more detailed discussion of the project description is needed. Discuss and explain the Fixed Base Operator (FBO) facilities so that potential traffic impacts can be better understood. This discussion should include the size of the FBO facilities currently compared to what is proposed as part of the project. Details of trip generation for the changes in size and use of the FBOs should be discussed in the traffic impacts analysis.
52	F-24	The Existing Conditions Peak-Hour Intersection LOS Analysis (Table 3-1) presents values that are too low for the Los Carneros Road/U.S. 101 Southbound Ramps intersection, Fairview Avenue/Calle Real intersection, and Fairview Avenue/U.S. 101 Northbound Ramps intersection. Please update as necessary.
53	F-28	Trip Generation South and Trip Generation North are briefly explained. However, the analysis should include the methodology used divide trips between North and South. This analysis should also include how the trip generations would change without the Ekwill and Fowler Road extensions.
54	Appendix B to Appendix F	The traffic counts used should provide more detail as to what type of vehicle entered and exited various Airport facilities. This information would help provide more precise information about vehicular behavior at the Airport and how trip distribution would change under various land use scenarios. By lumping all vehicles in to one category, critical information is missed.

Number	DEIR Reference	Draft EIR Comment
		Additionally, traffic counts to determine ins and outs at the entrance and exit of the existing Airport terminal should have been performed.
55	Appendix C to Appendix F	SYNCHRO is the software used to generate LOS results for project analysis. The methodology for this planning method analysis is Intersection Capacity Utilization (ICU). Appendix C of the Traffic Impact Study for the DEIR is not based on the 1,600 vph saturation flow rate with 10% lost time convention adopted by the City of Goleta which is also consistent with SBCAG's Congestion Management Program. The SYNCHRO analysis must be redone with the appropriate parameters for the ICU approach. Once this is done, the LOS analysis must be redone to adequately analyze project and cumulative impacts.