CHAPTER 3
COMMENTS AND RESPONSES

3.1 INTRODUCTION

The City of Goleta released the Proposed Final EIR for the Marriott Residence Inn/Hollister Center Project (12-EIR-1; SCH #2007121058) in October 2013 (i.e., Part 1). The project was introduced to the City of Goleta Planning Commission on October 28, 2013. At the request of the applicant, the Planning Commission continued the project indefinitely on November 25, 2013, to allow for circulation of the Proposed Final EIR. Although Final EIRs are required to be circulated for additional public review, the City of Goleta noticed and circulated the Proposed Final EIR for additional public comment from December 3, 2013 to February 3, 2014. A copy of each numbered comment letter and a numbered response to each comment are provided in Chapter 3, Response to Comments, of Part 2 of this document. To avoid confusion, the comment letters are numbered to begin where the comment numbers on the Revised Draft EIR left off, starting with Comment Letter No. 9. Table 3-1 summarizes the comments received on the Proposed Final EIR.

In total, three state agencies, one local agency, and four interested parties/individuals submitted written comments on the Proposed Final EIR. Table 3-1 provides a comprehensive list of commenters (separated into these three groups, provided in the order in which they are responded to below) and comment letter number used to identify the commenter. The complete text of the comments (presented as the actual comment letters) and the Lead Agency’s responses are provided in Section 3.2 of this chapter.

TABLE 3-1
PUBLIC COMMENTS RECEIVED ON THE PROPOSED FINAL EIR

<table>
<thead>
<tr>
<th>Comment Letter No.</th>
<th>Commenter</th>
<th>Comment Summary</th>
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</table>
| 9                  | Scott Morgan Director State Clearinghouse (January 13, 2014) | • Notes agencies that responded during the comment period are enclosed.  
  • Notes Public Resources Code § 1104(c) states the nature of comments and responsibility of the agency.  
  • Notes proposed project is in compliance with State Clearinghouse review requirements for draft documents under CEQA.  |
| 10                 | Dave Singleton Program Analyst Native American Heritage Commission (December 4, 2013) | • Recommends records search at the appropriate Information Center and to list known or previously recorded resources in the Proposed Final EIR.  
  • Recommends preparation of technical report if further archaeological survey is required.  
  • Recommends site location, Native American human remains locations, and associated funerary objects remain confidential and not available to public.  
  • Provides a list of Native American Contacts for consultation.  
  • Recommends the EIR consider environmental justice and consult with representatives of tribal governments.  
  • Advises mitigation measures should be included to address accidental discovery of archaeological resources, as well as |
<table>
<thead>
<tr>
<th>Comment Letter No.</th>
<th>Commenter</th>
<th>Comment Summary</th>
</tr>
</thead>
</table>
| 11                 | Patricia A. Abel  
District Deputy  
Department of Conservation, Division of Oil, Gas & Geothermal Resources  
(February 7, 2014) | - States that the Division has no jurisdiction or statutory responsibility for the proposed project because there are no oil or gas wells on the project site.  
- Recommends nearby well, Amerades Hess Corp “Perry” 1 well, be considered in relation to the project location.  
- Recommends that structures should not be placed in a way that would impede future access to any potential wells on the project site.  
- Notes that the Division does not have any documentation regarding oil production and related infrastructure on the project site; however, equipment relating to oilfield operations may be encountered during excavation.  
- Provides contact information for questions. |
| 12                 | Kamil S. Azoury, P.E.  
General Manager/  
District Engineer  
Goleta Sanitary District  
(January 9, 2014) | - The Goleta Sanitary District provides wastewater service to the project site and would provide wastewater service for the proposed project.  
- States that the Goleta Sanitary District provides sewer service for approximately 11,000 customer accounts within the service area, not 6,000 as stated in Section 4.13 of the Proposed Final EIR.  
- States that wastewater treatment services are provided to approximately 85,000 people in the region (Goleta Valley, UCSB, Santa Barbara Municipal Airport, and unincorporated Santa Barbara).  
- Recommends the applicant coordinate with Southern California Edison on its existing power pole on Hollister, which the Goleta Sanitary District currently utilizes.  
- States that the Goleta Sanitary District will review and approve sewer facilities, including the location of the sewer service connection point, sampling manholes, and grease interceptor(s).  
- States that planting trees over existing sewer lines should be prohibited in the Landscaping Plan or mitigated for. The Vitrified Clay Pipe sewer line and the District sewer manhole need to be kept accessible.  
- Provides contact information. |
| 13                 | David Stone, RPA  
Cultural Resources Manager  
Dudek  
(January 30, 2014) | - States that an ethnohistoric study of CA-SBA-58 is unnecessary.  
- States that CA-SBA-58 is neither a “historic landscape,” “historic site,” nor an “ethnographic landscape” relative to CEQA and, therefore, no cultural landscape study is required. |
| 14                 | Peter N. Brown  
Attorney at Law  
Brownstein Hyatt Farber Schreck  
(February 3, 2014) | - States that the Proposed Final EIR response to comments regarding ethnohistoric and ethnographic are accurate in Section 4.6 of the EIR.  
- States that the Proposed Final EIR includes well-supported and accurate analysis of climate change.  
- Considers the CEQA analysis of climate change accurate in that it considers the impact of the project on the environment, not of |
3.2 COMMENTS AND RESPONSES OVERVIEW

This section of the Revised Final EIR contains all comments received on the Proposed Final EIR during the public review period along with the Lead Agency’s responses to these comments. Reasoned, factual, good-faith responses have been provided to all comments received, with a particular emphasis on significant environmental issues. Detailed responses have been provided where a comment raises a specific issue. Where a comment does not raise a significant environmental issue, the comment is noted, and will be forwarded to the Planning Commission and City Council for consideration.

The following section contains the original comment letter, which has been bracketed to isolate the individual comments, preceded by the responses to the comments by comment letter. All comments are included in the Revised Final EIR, and accordingly are entered into the administrative record for the proposed project. As part of the record, the comments and responses will be forwarded to the City’s decision-makers for their consideration of the proposed project.
State Agencies
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January 13, 2014

Natasha Campbell
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

Subject: Marriott Residence Inn and Hollister Center Project
SCH#: 2007121058

Dear Natasha Campbell:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 10, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

c: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044

TOLL-FREE (800) 600-4441 FAX (916) 355-3018 www.spr.ca.gov
### Document Details Report

**State Clearinghouse Data Base**

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<tr>
<td><strong>Type</strong></td>
<td>EIR Draft EIR</td>
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<tr>
<td><strong>Description</strong></td>
<td>The application includes a Development Plan for a 118-room hotel on a vacant parcel located at the northeast corner of Hollister Avenue and Robin Hill Road. The hotel site occupies the westerly 3.79 acres of a larger 10.71-acre parcel. A lot split is proposed to create two separate legal parcels. Parcel 1 (6.90 acres) would include the existing Hollister Center research-manufacturing development and Parcel 2 (3.81 acres) would accommodate the hotel development. Reciprocal access is proposed between Parcel 1 and 2. The project also includes a Development Plan Amendment to update the permit for the existing Hollister Center on proposed Parcel 1. The project also includes requests to modify front yard setbacks for parking and the trash enclosure for the hotel development and re-approval of modifications for existing parking and landscaping for the Hollister Center (previously approved for the existing development plan).</td>
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#### Lead Agency Contact

<table>
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<tr>
<th>Name</th>
<th>Natasha Campbell</th>
</tr>
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<tbody>
<tr>
<td><strong>Agency</strong></td>
<td>City of Goleta</td>
</tr>
<tr>
<td><strong>Phone</strong></td>
<td>805 992 0030</td>
</tr>
<tr>
<td><strong>Fax</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Address</strong></td>
<td>130 Cremona Drive, Suite B</td>
</tr>
<tr>
<td><strong>City</strong></td>
<td>Goleta</td>
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<td><strong>Zip</strong></td>
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#### Project Location

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<tr>
<td><strong>Lat./Long</strong></td>
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<td><strong>Cross Streets</strong></td>
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<td><strong>Parcel No.</strong></td>
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#### Proximity to:

- Highways: US 101/SR 217
- Airports: Santa Barbara Municipal
- Railways: Southern Pacific Railroad
- Waterways: Los Camaros Creek/San Pedro Creek, Las Vegas Creek, San Jose Creek, TECOSISTO Creek
- Schools: Alasacake
- Land Use: UCSB, Los Pueblos HS, Goleta Valley Jr. HS, Kellogg ES Business Park land use designation; Hotel Overlay; M-RP; Industrial Research Park zoning designation

#### Project Issues

- Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Landuse; Cumulative Effects

#### Reviewing Agencies

- Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautical; California Highway Patrol; Caltrans, District 5; Air Resources Board; Regional Water Quality Control Board, Region 3; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

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**June 2014** 3-8
### Document Details Report

**State Clearinghouse Data Base**

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<tr>
<td>11/27/2013</td>
<td>11/27/2013</td>
<td>01/10/2014</td>
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December 4, 2013

Ms. Natasha Campbell, Planner

CITY OF GOLETA
130 Cremona Drive, Suite B
Goleta, CA 93117

RE: SCH#2007121058 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the “Marriott Residence Inn and Hollister Center Project;” located in the City of Goleta; Santa Barbara County, California

Dear Ms. Campbell:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine if a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s). The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the
proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People... with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies" and Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead, lead agencies include in their mitigation plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list
Comment Letter 9: State Clearinghouse, January 13, 2014

Response to Comment No. 9-1

The comment states that the State Clearinghouse (SCH) submitted the Proposed Final EIR to selected state agencies for review and comment, in compliance with SCH review requirements for draft environmental documents and pursuant to CEQA. The SCH also provided a copy of a letter received from the Native American Heritage Commission (12/4/13).

Responses to the Native American Heritage Commission letter are provided in Comment Letter 10.

The comment also states that the Lead Agency has complied with the SCH review requirements for draft environmental documents pursuant to CEQA.

The comments have been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
Comment Letter 10

December 4, 2013

Ms. Natasha Campbell, Planner
CITY OF GOLETA
130 Cremona Drive, Suite B
Goleta, CA 93117

RE: SCH#2007121058 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "Marriott Residence Inn and Hollister Center Project;" located in the City of Goleta; Santa Barbara County, California

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If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

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archaeological sensitivity, a certified archaeologist and a culturally affiliated
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ground-disturbing activities. Also, California Public Resources Code Section
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Lead agencies should consider first, avoidance for sacred and/or historical
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then, lead agencies include in their mitigation plan provisions for the analysis and
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Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American
human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA
§15064.5(e), and Public Resources Code §5097.98 mandates the process to be
followed in the event of an accidental discovery of any human remains in a
location other than a dedicated cemetery.

Sincerely,

Dave Singleton,
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

Response to Comment No. 10-1

The Native American Heritage Commission (NAHC) advises the Lead Agency to perform a records search at the appropriate Information Center and list any previously recorded cultural resources within the area of potential effect (APE) in the EIR.

A records and literature search was conducted at the Central Coast Information Center at the University of California Santa Barbara. Searches were also conducted at the University of California, Repository of Archaeological and Ethnographic Collections, and the archive at the Santa Barbara Museum of Natural History. Additionally, archaeologists who have previously been involved with archaeological investigations in the area were contacted for further understanding of the current archaeological state of previously identified resource CA-SBA-58.

Furthermore, a list and summary of previously recorded cultural resources within the APE are provided in EIR Section 4.4, Cultural Resources, under Impact CUL-3, Archaeological Resources, and Table 4.4-1.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 10-2

The comment recommends that if an additional archaeological inventory is required, a report should be prepared detailing the findings of the records search and field survey. This report should be coordinated with the NAHC and submitted to the planning department. Sensitive information regarding site locations, Native American human remains, and associated funerary objects should be included in a confidential addendum and not be accessible to the public. The comment also advises the City to refer to the list of appropriate Native American Contacts provided to determine whether the proposed project would or would not potentially have an impact on cultural resources.

As discussed in EIR Section 4.4, Cultural Resources, under Impact CUL-1, Historic Resources, the findings of the records search and field survey revealed there are no historic resources (buildings or other structures) on the project site, and there is no potential for the project to impact historic resources. Likewise, paleontological research revealed no significant impacts were identified for paleontological resources (Impact CUL-2, Paleontological Resources/Geologic Features). Archaeological resource CA-SBA-58 was identified as an archaeological site that has potential to yield information that is important to the understanding of the prehistory of the area. A list and summary of CA-SBA-58 with detailed inventory of the site, along with an explanation of CA-SBA-58 in relation to the proposed project, are provided in EIR Section 4.4, Cultural Resources, Table 4.4-1.

Additionally, see Response to Comment No. 1-2 in Chapter 8, Response to Comments, of the October 2013 Proposed Final EIR (RFEIR Part 1), which outlines City efforts of coordination with individuals identified on the NAHC-provided Native American contact list, including issuance of the Notice of Preparation in 2009, notice of fieldwork occurring in in May 2010, an August 2010 meeting to discuss the Draft Cultural Resources Management Services (CRMS) report, and a May 2013 meeting to discuss the Revised Draft EIR Cultural Resources section.
and final CRMS report. Interested members of the Native American community (including the individuals identified on the NAHC contact list) were made aware that there would be continued opportunities for participation through the completion of the environmental process and decision-maker hearings. The City of Goleta’s Native American contact list is continuously updated based on updated contact information provided by the NAHC as well as by members of the local Chumash Native American community.

Also, see Response to Comment No. 1-5 in Chapter 8, Response to Comments, of the RFEIR Part 1, which states that culturally sensitive and confidential information is not included in the EIR or other public documents for the project.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 10-3

The comment recommends the City consider environmental justice concerns and consultation with tribes for input.

See Responses to Comments No. 1-2 and 1-7 in Chapter 8, Response to Comments, of the Proposed Final EIR, which identify the pre-project and during-project consultation process involving the above-mentioned concerns. Additionally, Response to Comment No. 1-2 in Chapter 8, Response to Comments, of RFEIR Part 1, identifies revisions to EIR Section 4.4.1.3, Project Site, Native American Consultation, as a result of consultation between the City and the Chumash community and efforts to address environmental justice concerns in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 10-4

The comment recommends that mitigation should address accidental discovery of archaeological resources, including how to identify and evaluate such resources. The comment also suggests a certified archaeological monitor and a knowledgeable Native American monitor be present for ground-disturbing activities in sensitive areas.

See mitigation measures MM CUL-3a: Phase 3 Archaeological Data Recovery Program and MM CUL-3b: Construction Monitoring, which address the above concerns in detail regarding discovery of archaeological resources. Per mitigation measure MM CUL-3a, the permittee would fund a City-approved archaeologist and a Chumash Native American observer to conduct a pre-project Phase 3 Program, which includes a mitigation program and implementation of actions to take in the occurrence of accidental discovery of archaeological resources. Mitigation measure MM CUL-3b(c) grants monitors authority to halt any activities impacting previously unidentified cultural resources and follow through with assessment.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
Response to Comment No. 10-5

The comment recommends that avoidance should be the first consideration for sacred and/or historical sites. If avoidance is not possible, the mitigation plan should include provisions for the analysis and disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

The City concurs with the primary use of avoidance, followed by a mitigation plan if avoidance is not possible. See Response to Comment No. 1-8 in Chapter 8, Response to Comments, of the RFEIR Part 1, which outlines compliance through mitigation measures. Types of mitigation include:

1. Avoiding the impact altogether by not taking a certain action or parts of an action.
2. Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
3. Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
4. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
5. Compensating for the impact by replacing or providing substitute resources or environments.

Furthermore, additional mitigation measures have been identified to address impacts on cultural resources, and specifically archaeological site CA-SBA-58. These mitigation measures include requirements to avoid and/or minimize direct impacts of standard construction methods such as over-excavation and re-compaction. The proposed project would also minimize impacts by protecting buried resources in place (See Response to Comment No. 1-3 and Section 4.4, Cultural Resources, of RFEIR Part 1.) Moreover, the proposed project also ensures compliance with all applicable state and local regulations.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 10-6

The comment recommends the City include provisions for discovery of human remains.

Mitigation Measure MM CUL-3e of Section 4.4, Cultural Resources, of the EIR details the plan requirements, timing, and monitoring if the discovery of human remains occurs.

Procedures pursuant to Public Resources Code 5097.98 include:

- Stop work in the affected area.
- Notify the coroner.
- Fence off the area.
- Leave all items in the area as is.

Monitoring by the City through site inspection will occur to ensure compliance with mitigation measure MM CUL-3c and MM CUL-3e and the City will respond to procedures if human remains are discovered. Also see Response to Comment No. 1-6 in Chapter 8, Response to
Comments, in the RFEIR Part 1. The language of MM CUL-3e is clarified in Section 2.1.27 of Chapter 2 of the Revised Final EIR to explicitly reference Government Code § 27491.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
February 7, 2014

Ms. Natasha Heifetz Campbell, Contract Planner
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

Dear Ms. Heifetz Campbell:

SCH#2007121058 EIR MARRIOTT RESIDENCE INN & HOLLISTER CENTER PROJECT

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

The Division has a record of one well drilled in close proximity to the Marriott Residence Inn & Hollister Center project area. The well, Amerada Hess Corp. "Perry" 1, was drilled to a total depth of 3903 feet and then plugged and abandoned in 1952. The well was plugged to meet the standards applicable in 1952 and left in a condition suitable for conversion to a water well. The well location is given as 175 feet south and 1415 feet west of the northeast corner of Section 18, Township 4N, Range 28W, San Bernadino B&M. The location is also given as 301 feet south and 206 feet east of the northwest corner of the Richard Perry property.

The Division recommends that the well’s potential location relative to the above project location be determined. If the well is within the project location then the well location needs to be plotted relative to proposed building footprints and building activity. Once located and exposed the well should be tested to ensure there is no detectable leakage. A recommendation to upgrade the plugging and abandonment condition of the well would be made after reviewing the well location relative to land use and testing results of the well. In addition, the Division does not recommend that structures be placed in a manner that would impede future access to the well.

The Department of Conservation’s mission is to balance today’s needs with tomorrow’s challenges and foster intelligent, sustainable, and efficient use of California’s energy, land, and mineral resources.
Ms. Natasha Heifetz Campbell  
February 7, 2014  
SCH#2007121058  
Page 2

The Division has no documentation regarding the location of oil sumps, storage tanks, pipelines or other infrastructure commonly associated with oil production. While the Division has no report of oil production from the above mention well, equipment attendant to oilfield operations may be encountered during excavation of the area. If you have any questions, please contact our district office at 805 937-7246

Sincerely,

[Signature]

Patricia A. Abel  
District Deputy

cc: CEQA - Unit
RECEIVED

Date of Notice: December 3, 2013
NOTICE OF AVAILABILITY OF
PROPOSED FINAL ENVIRONMENTAL IMPACT REPORT FOR PUBLIC COMMENT

Marriott Residence Inn and Hollister Center Project
Case Nos. 09-075- VTM, -DP, 09-079-DPAM
6300 Hollister Avenue; APN 073-050-020
12-EIR-001

NOTICE IS HEREBY GIVEN that the Planning and Environmental Review Department of the City of Goleta (City) completed a proposed Final Environmental Impact Report, 12-EIR-1 and Errata (Final EIR) for the project described below. The proposed Final EIR has not been certified by the City of Goleta. The City of Goleta invites comments on the adequacy and completeness of the environmental analysis and mitigation measures described in the proposed Final EIR.

This proposed Final EIR replaces the Revised Draft EIR circulated for public comment from February 15, 2013 through April 4, 2013. In response to comments received on the Revised Draft EIR, the City has prepared responses to those comments and updated the Revised Draft EIR. This new document, referred to here as the proposed Final EIR, is now being circulated for additional public comment.

The City is circulating the proposed Final EIR for public comment because the Notice of Availability of the Revised Draft EIR released in February 2013 inadvertently failed to disclose that the proposed project would result in potentially significant, but mitigable effects on the environment associated with transportation and traffic. As a result, to provide greater opportunity for public disclosure and comment, the City is now circulating the proposed Final EIR with this updated notice which discloses all the potentially significant impacts of the project.

PROJECT LOCATION: 6300-6370 Hollister Avenue; APN 073-050-020; An existing office/research and development building, Hollister Center, is located on the eastern portion of the subject property (Parcel 1 of the Vesting Tentative Parcel Map). The proposed Marriott Residence Inn would be located on the western portion of the property (Parcel 2 of the Vesting Tentative Parcel Map). The project site is located between La Patera Lane on the east and Robin Hill Road on the west, City of Goleta, California.

BACKGROUND: In 2008, the City of Goleta approved a project (07-007-OA, -DP, -TPM; 07-167-DP AM; 07-MND-003/SCH #2007121058) which was a larger version of the current project request. In 2000 the applicant submitted a new project and requested the City rescind the 2008 approval and related entitlements. Since 2009, the applicant has incorporated a number of changes to the project size and design. The proposed Final EIR has been prepared to fulfill the California Environmental Quality Act (CEQA) requirements for the current project request.

PROJECT DESCRIPTION: Tony Woznok of R.D. Olson Development is representing the applicants, Robert (Bob) Olson of R.D. Olson Development and Russ Goodman of Sares Regis Group, General Partner of 6300 Hollister Associates, L.P. (property owner). The following discretionary City actions are requested by the applicant as part of the approval process for the project:

- A Vesting Tentative Parcel Map to subdivide the existing 10.71 acre parcel, APN 073-050-020, into two separate, legal parcels of 6.90 acres (Parcel 1) and 3.81 acres (Parcel 2). The subdivision frontage improvements include sidewalks along Hollister Avenue, Robin Hill Road, and La Patera Lane and landscaping on both sides of the new sidewalk on Hollister Avenue and Robin Hill Road, upgrades to the existing bus stop/bus pull out on Hollister Avenue, three new landscaped traffic medians in Hollister Avenue, new and relocated utilities, a new driveway on Hollister Avenue, a relocated driveway on Robin Hill Road, and new street lights.
**Comment Letter 11: Department of Conservation Division of Oil, Gas & Geothermal Resources, February 7, 2014**

**Response to Comment No. 11-1**

The comment notes that the Division of Oil, Gas, and Geothermal Resources (Division) of the Department of Conservation reviewed the EIR and determined that it does not have jurisdiction or statutory responsibility for the project. The comment also outlines the Division’s responsibilities under Public Resources Code § 3106.

Additionally, the comment notes the Division’s records show one well (the Amerada Hess Corp. “Perry 1”) is close to the project area. The well is 3,603 feet deep and was abandoned and plugged in 1952 for potential future use as a water well. The comment recommends that the well location and proximity to the proposed project be determined. If the well is within the boundaries of the proposed project, the comment states building plans need to account for future access to the well. The comment recommends that the well should be tested for leakage and a potential upgrade to the plugging condition circa 1952 should be considered, depending on the test results.

The location of the identified well (Amerada Hess Corp. “Perry 1”) is not within the boundaries of the proposed project. According to Appendix AA of this document, Exhibit Map of Estimated Location of “Perry 1” Well, the well is approximately 0.3 mile southwest of the project site.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

**Response to Comment No. 11-2**

The comment notes that the Division does not have any documentation of the location of oil sumps, storage tanks, pipelines, or other infrastructure associated with oil production for the identified well (Amerada Hess Corp. “Perry 1”). The comment recommends that, despite no documentation, equipment related to oilfield operations could still be encountered during excavation of the project site area. The Division provided a contact number for the district office should the City have any questions.

The proposed project site is not known to be historically associated with oil or gas production wells or related uses. Therefore, no leaks associated with production wells, sumps, or other oil production activities are expected on site, nor is old oil and gas production equipment expected to be encountered on site. Additionally, a Phase I assessment was prepared for the proposed project, which found no evidence that would suggest abandoned oil infrastructure occur on the project site (see Appendix L of the RFEIR). Therefore, there is no reasonable expectation of encountering any abandoned oil infrastructure as a result of construction of the proposed project.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
Local Agencies
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January 9, 2014

Natasha Heifetz Campbell, Contract Planner
City of Goleta
130 Cremona Drive, Suite B
Goleta, CA 93117

SUBJECT: Notice of Availability of Proposed Final Environment Impact Report
For Public Comment,
Marriott Residence Inn and Hollister Center Project
Case Nos. 09-075- VTM, -DP, 09-079- DPAM
6300 Hollister Avenue, APN 073-050-020, 12-EIR-001

Dear Ms. Campbell,

This letter is in regards to the above-mentioned document.

The Goleta Sanitary District (the District) under permit from the Regional Water Quality Control Board operates a regional wastewater treatment plant that provides wastewater treatment to the Goleta Valley. The District currently provides wastewater service to this property and would provide wastewater service for this proposed project.

The District would like to provide the following comments regarding the Proposed Final Environmental Impact Report:

Section 4.13 UTILITIES AND SERVICE SYSTEMS
4.13.1 Existing Conditions
4.13.1.1 Wastewater

This section states that the District provides sewer service for 6,000 customers. This is an incorrect number of customers. The District provides sewer service for approximately 11,000 customer accounts within the District service area and as a regional wastewater treatment plant, provides wastewater treatment and disposal services for approximately 85,000 people within the Goleta Valley, UCSB, Santa Barbara Municipal Airport and unincorporated Santa Barbara areas.
January 9, 2014
Page Two

12-3

MM AES – 1h/AES – 2h Underground Utilities

The District currently utilizes an existing Edison power pole on Hollister Ave. near the proposed driveway entrance to provide power for existing District flow monitoring equipment within the existing District sewer facilities. This existing electrical connection shall be maintained operational. The applicant shall coordinate with Edison the installation of any required underground vault for this service.

12-4

MM UTI- 1a. Sewer Service

The District will review and approve the location of the sewer service connection point and associated sampling manholes and grease interceptor(s) for this project.

12-5

Landscape Plans Figure 2-15

This Plan calls for the planting of several large trees within the area of an existing District 8-inch diameter Vitrified Clay Pipe sewer line and a District sewer manhole. The Landscaping Plan needs to prohibit the planting of any tree directly over the existing District sewer line or include a mitigation measure for the applicant to replace or line the existing sewer pipe to prevent root intrusion and the possibility of a sewer back-up as a result of root intrusion. The sewer manhole needs to be kept accessible to allow scheduled maintenance on this sewer line.

12-6

The District appreciates the opportunity to comment on this issue. Please do not hesitate to call me at 967-4519 if you have any questions.

Very truly yours,

GOLETA SANITARY DISTRICT

Kamil S. Azoury, P.E.
General Manager/District Engineer

KSA: LA:

N:
Marriot Hotel Hollister Ave\GSD letter response to EIR Notice 12172013.docx
Comment Letter 12: Goleta Sanitary District, January 9, 2014

Response to Comment No. 12-1

The comment reaffirms the Goleta Sanitary District’s jurisdiction for wastewater services at the project site.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 12-2

The comment corrects the number of customers served by the Goleta Sanitary District as approximately 11,000 customer accounts within the District’s service area as a regional wastewater treatment plant, and provides wastewater treatment and disposal services for approximately 85,000 people within the Goleta Valley, UCSB, Santa Barbara Municipal Airport, and unincorporated Santa Barbara areas.

Section 4.13.1.1, Wastewater, of the EIR is revised as follows:

The Goleta Sanitary District (GSD) currently provides sewer service to approximately 11,000 customer accounts within the GSD service area and, as a regional wastewater treatment plant, provides wastewater and disposal services for approximately 85,000 people within the Goleta Valley, UCSB, Santa Barbara Municipal Airport, and unincorporated Santa Barbara areas and would provide sewer service to the project. The proposed project also lies within the service area of the GSD.

GSD uses a “separate” sewer system. In this type of system, the pipes used to transport the wastewater to the treatment plant carry only wastewater. Santa Barbara County Flood Control maintains a separate system of storm drains that takes care of the large volumes of water from rain. Stormwater is discharged directly to creeks without treatment (GSD 2012).

Response to Comment No. 12-3

The comment states that the GSD currently utilizes an existing Southern California Edison power pole on Hollister Avenue and installation of any required underground vault, per mitigation measure MM AES-1h/AES-2h, must be coordinated with Southern California Edison.

The project engineer has confirmed connection for the proposed vault and no changes would be required that would affect current GSD connections.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 12-4

The comment states that GSD will review and approve the location of the sewer service connection point and associated sampling manholes and grease interceptor(s) per mitigation measure MM UTI-1a.
The project engineer has already begun coordination efforts with GSD on sewer connection, manholes, and grease interceptors.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 12-5

The comment addresses Figure 2-15, Landscape Plans, which identifies the planting of trees within the area of an existing GSD 8-inch diameter Vitrified Clay Pipe sewer line and sewer manhole. The GSD prohibits the planting of any tree directly over the existing sewer line and the manhole needs to be kept accessible to allow for schedule maintenance activities.

The landscape plan provides flexibility with regard to tree placement. However, trees are not intended to be planted directly over the sewer line or manholes. Compliance with standard GSD regulatory process will be required in project conditions of approval. The condition of approval will prohibit trees from being planted directly over the sewer line (unless the sewer line is replaced or lined in a manner acceptable to GSD); require that the sewer manholes be accessible for maintenance; and require that GSD sign off on the final landscape plan before final City of Goleta DRB review and applicable City of Santa Barbara design review and approval of the landscape plan for Hollister Avenue.

MM AES-1a/AES-2a is revised to include GSD review and approval of the landscape plan before City of Goleta and applicable City of Santa Barbara design review, as follows:

**MM AES-1a/AES-2a. Receive Preliminary and Final Approval from Design Review Board**

The permittee must receive preliminary and final approval from the Design Review Board (DRB). Staff in consultation with the DRB must specifically consider and ensure that the details of the preliminary and final lighting, utility, landscape, and building plans are consistent with the approved project and conditions of approval affecting these project features, including but not limited to, mitigation measures MM AES-1b/AES-2b through AES-3a. To ensure consistency with assumptions regarding loss of mountain views and compatibility with surrounding development, special attention must be given to consistency of final plans with project approval assumptions for grading plans/finished floor elevations, roof heights, placement of mechanical equipment, colors, materials, finished floor elevations, and changes to plant species in the landscape plan, particularly with regard to screening the development but maintaining views of the mountains.

**Plan Requirements and Timing:** The review must include site plan, floor plan, elevations, grading plan, landscape plan, frontage improvements, and lighting plans consistent with the DRB Design Review Board submittal requirements. Additional materials must be provided as required by the DRB Design Review Board to complete its review. Preliminary and final approval must be granted prior to the City of Goleta issues any permits for grading or construction issuance of a land use permit. City of Santa Barbara review and approval is also required for Hollister Avenue frontage improvements and the new Hollister Avenue medians. In addition, Goleta Sanitary District (GSD) must sign off on the project landscape plan before City of Goleta
DRB preliminary review (and applicable City of Santa Barbara design review) to ensure new tree placement complies with GSD requirements.

**Monitoring:** City staff will must verify compliance prior to before issuance of a land use permit the City issues any permits for grading or construction, during field inspection, and prior to before final inspection the City issues certificates of occupancy.

No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

**Response to Comment No. 12-6**

The comment recommends calling GSD with any questions.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
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Interested Parties
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January 30, 2014

Ms. Natasha Campbell
Project Planner
City of Goleta
130 Cremona Drive
Goleta, CA 93117

RE: Marriott Residences Inn
Final Environmental Impact Report
12-EIR-1

Dear Ms. Campbell:

In my capacity as a City-qualified archaeologist and expert with 30 years’ experience in Goleta prehistory, I offer the following comments on the adequacy of the Final Environmental Impact Report (EIR) for the Marriott Residences Inn (MRI) response to comments raised during distribution of the Public Draft EIR regarding ethnohistoric and ethnographic issues.

In my opinion, FEIR Response to Comments 4-26 and 5-12 detail reasons why the issues raised in DEIR comment letters do not apply to the project site.

Need for an Ethnohistoric Study

Final EIR Response to Comment 4-26 explains that there is no evidence CA-SBA-58 was occupied during the Ethnohistoric Period, when the Franciscans made their observations of villages including Saxapah/ at the intersection of Fairview Road/Hollister Avenue. Therefore, an ethnohistoric study will not identify any contemporary descendants of those individuals who may have occupied CA-SBA-58. This conclusion aligns with the Cultural Resources Guidelines adopted by the City of Goleta from the County of Santa Barbara (1993: 8) which state:

6.0 Ethnohistory

If known Chumash historic villages are within the project site, an ethnohistoric study of the site shall be done to identify any living descendants of Native Americans who occupied the village. This study would include genealogical research to link living descendants to the village in question. This research would complement the input of other contemporary Native Americans gathered during other interviews.
Ms. Natasha Campbell  
January 30, 2014
Page 2

Since there is no known evidence of a Chumash ethnohistoric village occupation within CA-SBA-58 and the project site, there is no nexus for doing such a study.

*Need for an Cultural Landscape Study*

Response to Comment 5-12 explains that there is no “historic” component to the landscape of the proposed MRI project site, so it is not specifically relevant to Goleta history (not specifically the “Good Land”). Furthermore, it should be noted that the City’s analysis is a CEQA analysis, not a NEPA analysis. The U.S. Department of Interior’s definition of a cultural landscape is not reflected in CEQA Guidelines definition of a “historical resource” or one considered significant. It is a federal term, not a state term. But even if the term did apply, CA-SBA-58 is not any of the following:

"Historic Landscape" – an Historic Landscape involves features and topographic modifications associated historic-era (post-prehistoric) occupation. These do not occur at the project site.

"Historic Site” – an Historic Site relates to historic-era occupation, which is not the case here.

"Ethnographic Landscape” – an Ethnographic Landscape relates to cultural resources that associated people define as contemporary heritage resources. The project site is not a location where contemporary Chumash gather for ceremonies or use for religious purposes that render it sacred. The project site is not listed as a "Sacred Land" by the Native American Heritage Commission.

In summary, the MRI project site is not characterized as an "Historic Landscape," "Historic Site," or "Ethnographic Landscape," since these are not a relevant terms associated to a prehistoric archaeological site that has no historic-era component and is not a contemporary sacred place to the Chumash community.

Thank you for the opportunity to provide supplemental expert comment on these issues.

Sincerely yours,

David Stone, RPA  
Cultural Resources Manager
Comment Letter 13: Dudek, January 30, 2014

Response to Comment No. 13-1

This comment agrees with the impact analysis in EIR Section 4.4, Cultural Resources, which concluded that there is no evidence CA-SBA-58 was occupied during the Ethnohistoric Period when the Franciscans made their observations of local Chumash villages.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 13-2

This comment agrees with the conclusions in EIR Section 4.4, Cultural Resources, that the project site does not include features associated with post-prehistoric occupation; that the site is not used by contemporary Chumash to gather for ceremonies or religious purposes; and that the site is not listed as a “Sacred Land” by the Native American Heritage Commission.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 13-3

This comment agrees with the conclusions in EIR Section 4.4, Cultural Resources, that the site has no historic-era component and is not identified as a sacred place.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
Comment Letter 14

February 3, 2014

BY E-MAIL (NCAMPBELL@CITYOFGOLETA.ORG) AND U.S. MAIL

Natasha Campbell
Contract Planner
City of Goleta
130 Cremona Drive
Goleta, CA 93117

RE: Comments on Marriott Residence Inn and Hollister Center Project Proposed Final Environmental Impact Report, dated October 2013 (12-EIR-001)

Dear Ms. Campbell:

Brownstein Hyatt Farber Schreck, LLP represents the applicants for the proposed Marriott Residence Inn and Hollister Center project, R. D. Olson Development and Sares-Regis Group. We respectfully submit the following comments regarding the proposed Final Environmental Impact Report (FEIR) for the project.

I. Comments Regarding Ethnohistoric and Ethnographic Issues

The FEIR’s responses to comments regarding ethnohistoric and ethnographic issues are accurate and appropriate. Attached is a letter from archaeologist David Stone which provides additional comments on the responses and background supporting the City’s responses and approach.

II. Comments Regarding Impacts of Global Climate Change on the Project

The FEIR’s analysis of climate change is well-supported and accurate. With regard to comments on the FEIR, no evidence has been provided to support any contention that “climate change is known to affect the frequency and/or severity of air quality problems.” The magnitude, type, or location of any asserted impacts have not been provided, nor has any explanation been given as to any link between alleged air quality problems associated with global climate change and the proposed project.

It is also well-settled that CEQA analysis considers the impacts of the proposed project on the environment, not the impacts of the environment on the proposed project. (See Ballona Wetlands Land Trust v. City of Los Angeles (2011) 201 Cal.App.4th 455; see also Pub. Resources Code § 21002.1(a) [The purpose of an environmental impact report is to identify the significant effects on the environment of a project...]; see also id., §§ 21061, 21068; CEQA Guideline § 15382; South Orange County Wastewater Auth. v. City of Dana Point (2011) 196 Cal.App.4th 1604; City of Long Beach v. Los Angeles Unified School Dist. (2009) 176 Cal.App.4th 889.)
Finally, the potential impacts of the proposed project on global climate change have been fully analyzed in Section 4.6 [Greenhouse Gas Emissions], as required under the City’s Initial Study Checklist and the CEQA Guidelines section 15064.4. The FEIR found that the proposed project would result in no significant project level or cumulative impact on global climate change. (See FEIR §4.6.) The City cannot require the mitigation of impacts that are not caused by the project. (See Nollan v. California Coastal Comm’n (1987) 483 U.S. 825; Dolan v City of Tigard (1994) 512 U.S. 374.) Since the proposed project does not cause any significant impact associated with emissions of greenhouse gases, it would be unlawful for the City to impose mandatory mitigation of impacts associated with global climate change.

14-3

Thank you for the opportunity to provide comments on the proposed FEIR.

Very truly yours,

[Signature]

Peter N. Brown

Attachment

0126750001110993913.1
ATTACHMENT

[Letter from David Stone]
January 30, 2014

Ms. Natasha Campbell
Project Planner
City of Goleta
130 Cremo Drive
Goleta, CA 93117

RE: Marriott Residences Inn
Final Environmental Impact Report
12-EIR-1

Dear Ms. Campbell:

In my capacity as a City-qualified archaeologist and expert with 30 years’ experience in Goleta prehistory, I offer the following comments on the adequacy of the Final Environmental Impact Report (EIR) for the Marriott Residences Inn (MRI) response to comments raised during distribution of the Public Draft EIR regarding ethnohistoric and ethnographic issues.

In my opinion, FEIR Response to Comments 4-26 and 5-12 detail reasons why the issues raised in DEIR comment letters do not apply to the project site.

Need for an Ethnohistoric Study

Final EIR Response to Comment 4-26 explains that there is no evidence CA-SBA-58 was occupied during the Ethnohistoric Period, when the Franciscans made their observations of villages including Saxpalit at the intersection of Fairview Road/Hollister Avenue. Therefore, an ethnohistoric study will not identify any contemporary descendants of those individuals who may have occupied CA-SBA-58. This conclusion aligns with the Cultural Resources Guidelines adopted by the City of Goleta from the County of Santa Barbara (1993: 8) which state:

6.0 Ethnohistory

If known Chumash historic villages are within the project site, an ethnohistoric study of the site shall be done to identify any living descendants of Native Americans who occupied the village. This study would include genealogical research to link living descendants to the village in question. This research would complement the input of other contemporary Native Americans gathered during other interviews.
Ms. Natasha Campbell  
January 30, 2014  
Page 2

Since there is no known evidence of a Chumash ethnohistoric village occupation within CA-SBA-58 and the project site, there is no nexus for doing such a study.

**Need for an Cultural Landscape Study**

Response to Comment 5-12 explains that there is no "historic" component to the landscape of the proposed MRI project site, so it is not specifically relevant to Goleta history (not specifically the "Good Land"). Furthermore, it should be noted that the City’s analysis is a CEQA analysis, not a NEPA analysis. The U.S. Department of Interior’s definition of a cultural landscape is not reflected in CEQA Guidelines definition of a "historical resource" or one considered significant. It is a federal term, not a state term. But even if the term did apply, CA-SBA-58 is not any of the following:

"Historic Landscape" - an Historic Landscape involves features and topographic modifications associated historic-era (post-prehistoric) occupation. These do not occur at the project site.

"Historic Site" - an Historic Site relates to historic-era occupation, which is not the case here.

"Ethnographic Landscape" - an Ethnographic Landscape relates to cultural resources that associated people define as contemporary heritage resources. The project site is not a location where contemporary Chumash gather for ceremonies or use for religious purposes that render it sacred. The project site is not listed as a "Sacred Land" by the Native American Heritage Commission.

In summary, the MRI project site is not characterized as an "Historic Landscape," "Historic Site," or "Ethnographic Landscape," since these are not a relevant terms associated to a prehistoric archaeological site that has no historic-era component and is not a contemporary sacred place to the Chumash community.

Thank you for the opportunity to provide supplemental expert comment on these issues.

Sincerely yours,

David Stone, RPA  
Cultural Resources Manager
Comment Letter 14: Brownstein Hyatt Farber Schreck, LLP, February 3, 2014

Response to Comment No. 14-1

Comment introduces the firm as representing the applicants for the proposed project and supports the impact analysis in EIR Section 4.4, Cultural Resources, regarding ethnohistoric and ethnographic issues. The comment also references an attachment from David Stone (same as Comment Letter 13 of this chapter), which provides additional comments on the responses and background supporting the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 14-2

The comment agrees with the conclusions in EIR Section 4.6, Greenhouse Gas Emissions, and states the impacts on climate change are well-supported and accurate, and meet the requirements under the City’s Initial Study Checklist and CEQA Guidelines § 15064.4. The comment also states that the City cannot impose mandatory mitigation of impacts associated with global climate change that are not caused by the project.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 14-3

The comment thanks the City for the opportunity to comment on the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
February 3, 2014

VIA EMAIL (ncampbell@cityofgoleta.org) AND U.S. MAIL

Ms. Natasha Campbell
Contract Planner
City of Goleta
130 Cremona Drive
Goleta, CA 93117

Subject: Marriott Residence Inn and Hollister Center Project
Case Nos. 09-075-TPM-DP; 09-075-DPAM
12-EIR-001

Dear Ms. Campbell:

I have been retained by R.D. Olson Development (Applicant) to provide expert technical assistance with regard to the Marriott Residence Inn and Hollister Center Project (Project).

I have reviewed the City of Goleta’s Final Environmental Impact Report, October 2013 (EIR), for the Project, as well as comment letters that were filed with the City regarding the City’s Draft Environmental Impact Report (February 2013), and offer the following additional comments regarding the EIR’s water supply and water quality analysis.

Water Supply

The EIR’s analysis of water supply sufficiency and impacts is appropriate. I review below the information provided in the EIR.

1. Documentation

The EIR discusses potential water supply impacts in two locations: Section 4.8 (Hydrology and Water Quality) and Section 4.13 (Utilities and Service Systems). The EIR properly discusses and evaluates the information contained in available technical reports and planning documents, including:

- Santa Barbara County’s 2013 Water Supply and Demand: Current Uses and Future Estimates (2013 County Report)
- Goleta Water District’s 2010 Urban Water Management Plan (2010 UWMP)
- Goleta Water District’s 2011 Water Supply Management Plan (WSMP)
- Goleta Water District’s 2010 Groundwater Management Plan
- Goleta Water District’s 2010 Water Conservation Plan

1 A copy of my professional biography is attached to this letter as Attachment A.
Chapter 3. Comments and Responses

2. GWD’s Existing and Planned Water Supply Sources

All water supply sources are identified and summarized in Table 4.1.3-3 of the EIR. Water supplies available to GWD include both local and imported sources. Local supplies from Lake Cachuma and the Goleta Groundwater Basin provide the majority of the GWD water supplies, with use of imported State Water Project water (State Water) and recycled water as additional supplies. All projected water supplies exist presently.

The 2011 Water Supply Management Plan (WSMP), prepared by GWD, identified the priorities of using these various supplies to maximize supply availability, minimize costs, and ensure reliability of future supplies. In an average year (non-drought condition), the District first utilizes Cachuma Project water, initially utilizing all carry-over, surplus, and spill entitlements, then drawing on its annual Cachuma entitlement. The next source of supply is groundwater, followed by deliveries of the more expensive State Water, if needed. Additionally, the District currently provides recycled water to 34 customers, primarily for landscape irrigation. Cachuma, State Water, and recycled water supplies are secured through collaborative agreements with federal, state, and local partners. Recycled water is provided through an agreement with the Goleta Sanitary District.

The following additional discussion of GWD’s available water supplies is provided to further explain the information already provided in the EIR.

Cachuma Water. As one of the Member Units of the Cachuma Project, GWD’s entitlement to Cachuma water is 9,322 AFY. Any amount of their entitlement that is not used can be carried over to following years as carryover water. During the occasional years when the dam spills, GWD takes as much water as it can and uses that water in lieu of groundwater pumping or for direct groundwater recharge injection. As a conservative assumption, only the 9,322 AF of entitlement is used for supply planning purposes by GWD. However, historically (for the period of 1997-2008), an average of 10,675 AFY of Cachuma water was delivered to GWD. This is 1,300 AFY, on average, more than is identified in GWD’s 2010 UWMP planning projections. (See 2010 UWMP, § 3.2.1.)

State Water. GWD’s allotment of State Water is 7,000 AFY, plus an additional allocation of 450 AFY through the Central Coast Water Authority’s Drought Buffer. Based upon DWR’s latest reliability analysis, State Water has a reliability of 60% (2010 UWMP, p. 3-4); for GWD that would correspond to 4,200 AFY. To be conservative, however, the SAFE Ordinance requires that for planning purposes 3,800 AFY of State Water be considered the firm average long-term yield (2010 UWMP, § 3.2.2.) As a result, an additional 400 AFY, on average, of State Water may be available to GWD, which can either be used to serve demand directly or is banked in the groundwater basin for future use, depending on the applicable requirements of the SAFE Ordinance.

Groundwater: Under the Wright Judgment, GWD has a water right to 2,350 AFY of groundwater from the Goleta groundwater basin. This judgment, the result of a formal groundwater adjudication process, provides a series of groundwater management elements to ensure that the Goleta groundwater basin is maintained in a hydrologically-balanced condition – e.g., not in overdraft. The basin is subject to the continuing jurisdiction and supervision of the court to prevent injury to the basin. Any production of groundwater in violation of the terms and conditions of the Wright Judgment may be enjoined by the court. In addition to its groundwater production right, the Wright Judgment also establishes GWD’s ability to store water in the basin by (a) injecting excess available Cachuma water through wells (direct recharge) and (b) using available surface water supplies in lieu of pumping groundwater (indirect recharge). This storage element has been actively used and, as of 2009, GWD had accrued storage in the basin of more than 43,000 AF. (2010 UWMP, p. 3-6.)
The Safe Water Supplies Ordinance (SAFE Ordinance), originally adopted in June 1991 as GWD Ordinance 91-01, amended November 1994 as GWD Ordinance 94-03, is an additional component of water resources management for the Goleta area. This ordinance is an operational plan for GWD that augments the storage quantified in the Wright Judgment and helps to ensure that sufficient groundwater supplies will be available during a drought to supplement deliveries of State Water or Cachuma water. Under the SAFE Ordinance, GWD is required to consider the availability of potable water supplies for new customers every year.

The SAFE Ordinance contains two important limitations on GWD’s use of the basin relative to historical water levels. First, in years in which groundwater elevations are below 1972 levels, SAFE only allows groundwater pumping if drought conditions have caused a reduction in deliveries of Lake Cachuma water. In addition, during periods when groundwater elevations are below 1972 levels, SAFE requires GWD to store at least 2,378 AFY (its “Annual Storage Commitment”) of its water supply as a “Drought Buffer”, including any delivered State Water in excess of 3,800 AFY. The Drought Buffer water can only be used for delivery to GWD customers during periods of drought which result in reduced availability of Lake Cachuma water supplies. In other words, GWD maintains water in storage in the basin to meet demands in drought conditions when other supplies are not adequate. Second, in years when groundwater elevations are above 1972 levels, SAFE allows GWD to pump groundwater to serve customer demands.

SAFE also provides a mechanism for ensuring that there are adequate groundwater supplies to serve any new demand in the event of a drought or other water supply shortage. SAFE establishes that, for each year in which all other water delivery obligations have been met, that GWD may allow new service connections up to 1% of the total potable supply. As part of this new service, the GWD is required to permanently increase the “Annual Storage Commitment” for the Drought Buffer by 2/3 of the demand of the new service connection(s). (2010 UWMP, § 3.1.) All water supply conditions have been met since 1997, with authorized new service connections adding 567.50 acre feet per year of demand since 1997. (WSMP, p. 51.) With the service of new demand, GWD must increase its Annual Storage Commitment so that there will be a sufficient quantity of water held as storage in the Drought Buffer to serve the additional demand in the event of drought or other water supply shortages. As of 2011, the Annual Storage Commitment was 2,378 AFY. (2010 UWMP, 3-1.)

The EIR discusses the current condition of the Goleta Groundwater basin. (EIR, 4.9-6.) The basin was determined by the court to be in a hydrologic balance in 1998 and therefore not in a state of overdraft. (2010 UWMP, 3-5 (citing DWR 2003).) As of May, 2011, the basin has experienced some of the highest water table levels recorded. (GWD Groundwater Management Plan § 5.7; 2010 UWMP, § 3.3.)

GWD currently has five fully operational groundwater production wells. Well extraction and treatment capacity is about 300 AFYmo or 3,600 AFY. (2010 UWMP, 3-6.) No new wells are proposed to serve projected future demand. For planning purposes, GWD anticipates on average pumping up to 2,350 AFY in future normal years – its water right under the Wright Judgment. However, by not taking all of its groundwater entitlement under the Wright Judgment in an average year, GWD anticipates maintaining a healthy drought buffer in the basin. (2010 UWMP, 3-6.) As noted above, GWD has stored more than 43,000 AF in the basin. “Given potential variations in demand, additional amounts could be pumped from the basin to serve customers, subject to the SAFE limitations and pumping capacity constraints; however, GWD does not currently anticipate the need to do so.” (2010 UWMP, 3-6.)

Recycled Water: Since 1994, GWD has delivered recycled water to serve non-potable demands within the district. The existing recycled water system can produce up to 3 million gallons per day (MGD) (approximately 3,000 AFY) of tertiary-treated effluent for recycling. (UWMP, § 4.1.) This water resource has high reliability because the amount of wastewater conveyed to the Sanitary Goleta District, even in drought periods, tends to remain constant. However, due to recycled water use patterns and delivery system limitations, GWD is delivering between 1,000 and 1,150 AFY of recycled water currently. (2010 UWMP, § 4.1.) Given that recycled water rates are significantly less (40%) than potable water rates, there is significant incentive to increase utilization of this supply. GWD may expand
It should be noted that the water supply projections evaluated in the EIR take into account the availability of each of GWD’s supplies under a range of hydrologic conditions – specifically, “normal,” “single dry” and “multiple dry” years – as well as climate change. (See 2010 UWMP, pp. 6-1 to 6-8.)

3. GWD’s Projected Water Demands

The demand projections provided in the EIR are based on the 2010 UWMP, which includes both short-term and long-term development scenarios. The 2010 UWMP employs two methods to estimate future water demand – a “moderate” and a “high” estimates. Both estimates conservatively assume full City of Goleta buildout by 2030. The proposed Project is included in the City’s buildout plan and thus is included in both demand projections. Additionally, both demand projections include compliance with the SBX7-7, the Water Conservation Act of 2009 (also known as the “20 by 2020” legislation), which, in GWD’s case, will require water use reductions of approximately 2% by 2015, and of approximately 5% by 2020.

The moderate estimate demand projection (see EIR, Table 4.13-1 [derived from 2010 UWMP, Table 2-14]) uses the population growth projections established by the Santa Barbara County Association of Governments (SBCAG). The SBCAG determined the average annual population growth for the City to be 0.8 percent for 2000-2030 and this factor was applied for both the residential and commercial/institutional sectors.

The high estimate (EIR, Table 4.13-1 [derived from 2010 UWMP, Table 2-15]) is based upon inclusion of all anticipated land uses within the GWD service area, including UCSB’s proposed LRDP and entitlements that pre-date and therefore are not subject to the SAFE Ordinance. (2010 UWMP, C-9.) The high estimate demand projections under the 2010 UWMP include previously authorized connections totaling 850 acre feet of future demands that were authorized before the SAFE ordinance limited new service connections equal to a maximum of 1% of the total potable water supply in 1991. (WSMP, p. 52.) There is the potential that some of the development projects included within the high estimate may not ultimately be permitted or built.

It should be noted that the City of Goleta’s Final EIR for the Goleta General Plan/Coastal Land Use Plan, certified on October 2, 2006 (General Plan FEIR), includes demand projections for GWD, which are based on GWD’s 2005 UWMP, that are slightly more than the 2010 UWMP’s moderate estimate and slightly less than the high estimate. The following table compares this demand information for normal water years.

Most recently, Santa Barbara County has projected GWD’s future water demand at 5-year intervals through the year 2040 by multiplying the Santa Barbara County Association of Governments 2002 population projections for the GWD service area by the “Compliance Water Use Target” amount of 111 gallons per capita per day (GPED) (Santa Barbara County Water Supply and Demand: Current Uses and Future Estimates, Appendix A, Table A-4 (2013 County Report)). This analysis shows lower projected demands on GWD supplies, as compared to the 2010 UWMP (see Table A-4 of that report).
Chapter 3. Comments and Responses

4. Comparison of Supplies and Demands

The EIR discloses, discusses and evaluates available water supply and demand information contained in the technical studies and reports identified in the EIR and finds that GWD likely has a sufficient supply to accommodate the anticipated new water demands of the Project.

First, the EIR compares supply and demand based on the 2010 UWMP projections. (EIR, 4.13-2.) The 2010 UWMP decreases GWD’s projected available water supplies by approximately 1,000 AFY from prior projections. (Compare 2006 General Plan FEIR, Table 3.9-3 [estimating projected supply of 17,672 AFY in normal years] and 2010 UWMP, Table 6-6 [projecting 16,622 AFY in normal years].) GWD’s existing water supply sources have not changed, but GWD has elected to apply even more conservative estimates of available supply. For example, GWD had previously projected that 3,000 AFY of recycled water would be available to serve projected demand, which is consistent with GWD’s present capacity to treat 3,000 AFY, whereas the 2010 UWMP projects only 1,150 AFY, which is the quantity of recycled water currently being delivered to non-potable uses.

The 2010 UWMP projections of demand as compared to supply indicate that in all normal water years through 2035, there is sufficient supply to meet the demands identified in the “moderate estimate” case. As discussed above, the proposed Project’s projected demand is accounted for in the moderate estimate.

For the “high estimate” demand scenarios, which conservatively include maximum theoretical new demand under SAFE, as well as all pre-SAFE entitlements, the demand estimates exceed supply estimates (based upon normal weather/supply conditions) for years 2020 through 2035. The difference in these amounts ranges from 25 AF in 2020 to 1,521 AF in 2035. However, the conservative assumptions employed by GWD in its 2010 UWMP water supply projections, when considered together, amount to substantially more than the differences in the demand versus supply amounts for 2020-2035. Specifically:

- The historical deliveries of Cachuma water (10,675 AFY) are over 1,300 AFY more than the assumed value for supply planning (9,322 AFY);
- The State’s own reliability-based estimates of average State Water deliveries (4,200 AFY) are 400 AFY more than the amount projected by GWD (3,800 AFY);

2 The Goleta General Plan FEIR concludes that sufficient water supplies would be available during all year types (normal, critical dry and multiple dry) to meet GWD’s projected demands, including Goleta’s maximum buildout under the General Plan/Coastal Land Use Plan (Goleta FEIR, 3.9-16 to 18), which includes the proposed Project. In single and multiple dry years, the Goleta General Plan FEIR finds that GWD’s Drought Buffer is available to offset any shortfalls in annual supplies. “The GWD currently has banked greater than 35,000 AF, which is sufficient to supply the projected groundwater demands under these various climatic scenarios.” (Goleta General Plan FEIR, 3.9-16; see also Goleta FEIR, Table 3.9-3.)
• Up to 2,000 AFY of additional recycled water will likely be brought on-line by 2035 as GWD already has the treatment capacity for this supply; and

• Groundwater in storage in the Goleta groundwater basin substantially exceeds the limitations of the SAFE Ordinance – e.g., water that is in excess of GWD’s annual groundwater water right of 2,350 AFY and in addition to water reserved for drought purposes.

In all single and multiple dry year projections, for both the moderate and high estimate demand projections (EIR, Tables 4.13-1 to 4.13-3, see also 2010 UWMP, Tables 6-6 to 6-11), when supply deficits are projected as a result of reduced surface water supplies, GWD’s significant groundwater storage reserves of more than 40,000 AF – the Drought Buffer – will be available to serve all GWD customers, including the proposed Project. Upon issuance of a “will-serve” letter to the proposed Project, GWD will be required to increase its annual contributions to the Drought Buffer, per the SAFE Ordinance, in order to ensure that sufficient supplies will be available to serve the Project, in addition to all other then-existing demand, even in drought conditions.

As a result, as described in the EIR, GWD has determined that the SAFE Ordinance, together with GWD’s key water management plans, will enable GWD to serve the present and future water supply demands within its service area, including the City. (EIR, p. 4.13-2, see also 2010 UWMP, 1-2.)

Second, as described in the EIR, the 2013 County Report also projects that there are sufficient GWD supplies to serve the Project. (EIR, Chp. 4.13.1.2.) A summary of the associated supplies, demands, and calculated surplus through the year 2035 is provided below. Projected supplies are the same as identified in the 2010 UWMP, with one exception: the County projects an increase in the use of recycled water over existing uses (1,150 AFY) by 550 AFY by the year 2035. (2013 County Report, Appendix A, Table A-6.) The 2010 UWMP projects that recycled water use will remain constant. The County’s projection is consistent with GWD’s present capacity to treat up to 3,000 AFY of recycled water when the demand for recycled water occurs. Even without the increased projections of recycled water use, the 2013 County Report projects a surplus for GWD. (2013 County Report, Appendix A, Table A-7.)

<table>
<thead>
<tr>
<th>2013 County of Santa Barbara Water Supply and Demand Report</th>
<th>2013 County of Santa Barbara Water Demand Report</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Comparison of Demand and Supply Projections for Goleta Water District (AFY)</strong></td>
<td><strong>Comparison of Demand and Supply Projections for Goleta Water District (AFY)</strong></td>
</tr>
<tr>
<td>Projection</td>
<td>2015</td>
</tr>
<tr>
<td>Total Supply*</td>
<td>16,667</td>
</tr>
<tr>
<td>Total Demand</td>
<td>11,655</td>
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<tr>
<td>Surplus</td>
<td>5,042</td>
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</tbody>
</table>

Sources: Santa Barbara County Water Supply and Demand, Current Uses and Future Estimates, Table A-4 and A-6.

*Includes prediction of progressively increasing delivery and use of recycled water within the GWD’s present capacity of 3,000 AFY.

5. **EIR Analysis of Project Impacts**

The EIR properly concludes that the Project will have less than significant impacts on the availability of water supply (utilities) and on hydrology. (See, generally, EIR Chp. 4.13.3.2 and Chp. 4.8.3.2.)

In the analysis of Utilities and Service Systems (EIR, Chp. 4.13), the EIR finds that the proposed Project may be served with existing entitlements and water supply resources and will not require expanded entitlements. (EIR, 4.13.6) As described in the EIR and the 2010 UMWP, all of GWD’s supplies are existing supplies, which are available and sufficient to serve the proposed Project. The Project demand is 14.46 AFY. (EIR, p. 4.13-9.) This amounts to 0.096% of the current GWD usage of 15,001 AFY. The SAFE Ordinance authorizes GWD to approve new service
connections up to 1% of the total potable supply, or approximately 150 AFY, based upon current usage. The Project’s demand is less than the total potential new demand that may be served in any year by GWD.

In its analysis of Hydrology and Water Quality Impacts (EIR, Chp. 4.8), the EIR finds that the proposed Project will not substantially deplete groundwater supplies (EIR, 4.6.3.2.) As discussed above, the basin is actively managed by the court pursuant to the Wright Judgment. The court determined that the basin was in hydrologic balance beginning in 1998 and no longer in a state of overdraft – in fact, more than 43,000 AF of water is in storage. The Wright Judgment ensures that the GWD may not increase groundwater production from the basin, whether pursuant to its water right or to produce water from storage, in a manner that would substantially deplete groundwater supplies. The SAFE Ordinance imposes additional restrictions on the GWD’s use of the basin. Importantly, water levels must be maintained at or above specified thresholds before GWD can increase production from the basin. The basin currently is experiencing some of the highest water table levels that have been historically recorded.

The EIR’s cumulative impacts analysis evaluates the adequacy of GWD’s projected water supplies to serve the City’s full buildout (see “moderate estimate” of demand) under all water supply conditions (normal, single dry and multiple dry years). (EIR, Chp. 4.13.4.2.) The EIR also evaluates the adequacy of GWD’s projected supplies as compared to a “high estimate” of demand, which includes conservative assumptions about maximum potential demand and supply within GWD’s service area. Based on all existing supplies that are available to the GWD, the EIR determines that the project’s contribution to cumulative impacts is less than significant.

Water Quality

The EIR’s analysis of water quality impacts is also appropriate. The proposed project includes four stormwater-specific mitigation measures (HYD-2a through HYD-2d) that collectively provide measures to ensure that stormwater water quality meets all regulatory requirements, including both the State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit for stormwater discharge and the state-compliant requirements included in the City of Goleta Stormwater Management Plan. As identified in mitigation measure HYD-2a, the project is required to obtain a NPDES permit from the Central Coast Regional Water Quality Control Board. These permits establish strict rules governing stormwater discharges and requirements for implementation and maintenance of Best Management Practices (BMPs) during project construction.

Mitigation measure HYD-2b clearly stipulates the requirement for a Stormwater Pollution Prevention Plan which is required to be submitted and approved before a land use permit is granted. A variety of BMP’s are specified. The plan includes regular inspections by City staff to ensure compliance during all construction phases.

Mitigation measure HYD-2c identifies the requirements for long-term stormwater management and drainage design features that will be required. These measures will ensure the project is compliant with the City’s Stormwater Management Plan (SWMP). The City’s SWMP was submitted to and approved by the Central Coast Regional Water Quality Control Board on February 4, 2010. The Regional Water Quality Board’s approval of the City’s SWMP indicates the Board’s determination that the SWMP contains adequate measures to insure both that water quality will not be degraded due to runoff from development and that compliance with the NPDES General Permit for Storm Water Discharges from Small MS4s, Water Quality Order No. 2003-0005-DWQ and CAS000004 (General Permit) will be insured.

Mitigation measure HYD-2d identifies the annual maintenance requirements for the installed stormwater quality and BMP system components on the project. This maintenance obligation will provide continued assurance that the quality of stormwater discharged from the project site is compliant with regulatory standards.
A number of technical studies indicate that the mitigation measures required by the NPDES permit and by the City's SWMP and the specific mitigation measures set forth in the EIR are effective in preventing significant water quality impacts. The City has extensive experience in monitoring the effectiveness of mitigation measures designed to protect water quality, and has imposed the mitigation measures contained in the EIR because these measures have been determined to be effective in fully mitigating water quality impacts. As such, the City of Goleta's compliance with the NPDES General Permit for Storm Water Discharges from Small MS4s, Water Quality Order No. 2003-0005-DWQ and CAS000004 (General Permit), includes an annual reporting requirement with which the City has fully complied since permit issuance. And, as stated in the permit (see State Water Resources Control Board Water Quality Order No. 2003-0005 – DWQ, p.5): "This NPDES Permit is consistent with the antidegradation policies of 40 CFR section 131.12, SWRCB Resolution 68-16, and RWQCBs’ individual Basin Plans. Implementing storm water quality programs that address the six Minimum Control Measures in previously unregulated areas will decrease the pollutant loading to the receiving waters and improve water quality." The six Minimum Control Measures identified in this MS4 program and which the City implements include:

- Public Education and Outreach on Storm Water Impacts
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Construction Site Storm Water Runoff Control
- Post-Construction Storm Water Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping for Municipal Operations

Finally, with regard to any concern that poor water quality from the site could percolate down to the underlying aquifer, please note that, as stated on p. 4.6-7 of the EIR, the aquifer beneath the project site is protected by a regionally significant confining layer. This confining layer will preclude any possible downward percolation of poor quality water associated with the proposed project and hence will preclude degradation of the aquifer water quality.

Thank you for the opportunity to provide these comments.

Sincerely,

Tim Drake  
for Cardno ENTRIX  
Direct Line 805-963-0438  
Email: timothy.thompson@cardno.com

Enc. Attachment A: professional biography

www.cardnoentrix.com
Summary of Experience

Mr. Thompson’s 28 years of professional background provide a broad base of experience in water resource science, regulatory issues, litigation support and project management. He has extensive knowledge of local, state, and federal regulations and policies and a detailed understanding of the roles and responsibilities of governmental agencies at various levels. He is active in numerous water resource projects, focusing on water quality and water supply for public-sector and private-sector clients. These projects typically involve technical analysis of a range of data types; coordination and negotiation with regulatory or other entities; consideration of budgetary and timeline constraints; and the need for robust scientific integrity and quality. His projects have involved issues related to regional groundwater basin analysis; groundwater management; development and implementation of long-term monitoring programs; water quality degradation; water rights disputes; water resource planning; water quantity and water quality modeling; reclaimed water utilization; conjunctive use and artificial recharge; stormwater and surface water quality modeling and monitoring; stormwater treatment, TMDL, and BMP evaluation; cost evaluations; and regulatory compliance. He provides leadership in corporate management, client development, technical program development, and project administration.

PROJECT EXAMPLES

Groundwater Resources Projects

Project Manager — BrightSource LLC, Hidden Hills Solar Electric Generating Station, Inyo County, California

Mr. Thompson manages ongoing efforts and provides expert testimony related to comprehensive aquifer investigations, basin-wide sustainable yield evaluations, well yield testing, energy—facility permitting assistance, evaluation of water right offsetting alternatives, analysis of potential regional basin effects and technical support at status conferences and public meetings.

Project Manager — Pacific Gas & Electric Company, Diablo Canyon Nuclear Power Plant, San Luis Obispo County, California

Mr. Thompson conducts comprehensive aquifer investigation, groundwater—surface water interaction assessment, well testing and rehabilitation, and regulatory consulting services for this facility. Projects to date have included (a) bedrock aquifer evaluation, installation of deep bedrock wells, aquifer and water quality testing, and determination of connection between groundwater and flows in a nearby creek and (b) groundwater analysis and monitoring well installation at the reactor site to characterize and document both groundwater flow orientation and any changes to water quality.

Project Manager — BrightSource LLC, Ivanpah Solar Electric Generating Station, San Bernardino County, California

Mr. Thompson manages the long-term groundwater monitoring program required for permit compliance. Work involves regular data collection and preparation of annual reports that meet requirements established in California Energy Commission site permit.
Project Manager — City of Fillmore, Ventura County, California

Mr. Thompson directed groundwater basin analysis, safe yield evaluations, municipal well site selection, basin-wide water quality and water supply modeling, analysis of depth-related groundwater water quality changes, water quality considerations regarding recycled water use, and well design, installation-oversight, and permitting evaluation of new water supply well field proposed by this groundwater-dependent city. Services also included groundwater-surface water interaction analyses, analysis of water quality vulnerability to effects of recharge associated with proposed changes to overlying land uses, water quantity, and water quality modeling for evaluation of potential impacts to groundwater resulting from Regional Board-required modifications to the city’s drinking water and wastewater treatment systems.

Project Administrator / Technical Lead — City of Avondale, Maricopa County, Arizona

Mr. Thompson oversaw the design, permitting and construction of a 15,000 AFY constructed wetlands and groundwater recharge project. The constructed wetlands facility treats nitrate-rich surface water from agricultural runoff and recycled water collected by the SRF canal system to standards acceptable for groundwater recharge and subsequent potable reuse. This project included project management, groundwater modeling, facility design, technical work for permit acquisition, installation (including design, logging, sampling and testing of monitoring wells), system start-up and preparation of comprehensive operations & maintenance manual, and ongoing technical support services.

Project Manager / Technical Lead — Apex Industrial Park, Las Vegas, Clark County, Nevada

Mr. Thompson was a project manager for this regional groundwater exploration and permitting effort resulting in installation of deep bedrock wells (to 2,400 ft depth), regional hydrogeologic evaluations, water rights filing, and water supply planning. Duties included regional geologic research and well site selection, driller selection and contracting, well logging, water quality sampling and analysis, drilling oversight, contract administration, well testing (design, operation, monitoring and evaluation), well completion design and supervision, and preparation of final technical report. Well site selections and regional hydrogeologic analyses were also conducted in four separate groundwater basins throughout the area north of Las Vegas, along with extensive water rights and federal agency coordination and planning.

Project Manager — University of California (UCSB), Santa Barbara, Santa Barbara County, California

Mr. Thompson evaluated groundwater Safe Yield projections and recycled water demand forecasts as prepared by local water purveyor (Goleta Water District) in support of UCSB’s preparation of their Long-Range Development Plan EIR. Work was based upon modeling scenarios and was associated with evaluation of drought period minimum supplies.

Project Manager — City of Santa Barbara, Santa Barbara, Santa Barbara County, California

Mr. Thompson directed implementation of a well injection recharge project. Project involved review of City wells and performance evaluations for conversion to injection wells, including evaluation of potential geochemical of mixing surface water and groundwater.

Project Manager — Lake Arrowhead Community Services District, San Bernardino County, California

Mr. Thompson was responsible for this regional groundwater exploration and development project, including well site selection, structural geologic mapping and analysis, well design, contractor selection assistance, and permitting (county and CEQA). Conducted installation

TIMOTHY J. THOMPSON, PG, CHG

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of five bedrock wells (600-800 ft deep), geophysical logging, and water quality testing. Follow-on work included evaluation of future drilling targets, environmental compliance, and identification of optimal future exploration targets.

**Project Manager — City of Santa Barbara, Santa Barbara County, California**

Mr. Thompson managed the drought mitigation well drilling program, including extensive groundwater exploration and development in multiple locations including:

- **Mission Creek - Site selection, well logging, water quality testing, and well performance testing of three bedrock production wells (900-1,300 ft deep).** Included installation of pipeline and power lines and all associated permitting and agency coordination.
- **North Portal of Mission Tunnel - Site selection, driller contracting, well logging, water quality testing, well performance testing and well completion of deep bedrock well.**
- **Gibraltar Reservoir - Groundwater exploration under emergency drought-related demands including regional hydrogeologic investigations, well site selection, water quality testing, performance testing. Project resulted in completion of five shallow alluvial production wells tapping water supplies present beneath reservoir bottom silts and muds during period when reservoir was completely dry. Time-domain electromagnetic geophysical techniques were used in well site selection.**

**Project Manager — Bear Valley Community Services District, Tehachapi, Kern County, California**

Mr. Thompson provided services including extensive analysis of this groundwater-dependent District’s needs and requirements, bedrock aquifer analyses, quantification of natural recharge, geophysical evaluations (seismic reflection/refraction), remote sensing investigations, site selection and installation of deep bedrock, alluvial, and monitoring wells, and consulting on groundwater management issues and opportunities.

**Technical Manager — City of Mesquite, Clark County, Nevada**

Mr. Thompson was the technical manager who oversaw the groundwater-surface water interaction component of the lower Virgin River Habitat Conservation Plan, as required for regulatory compliance with Section 7 of the Endangered Species Act. Mr. Thompson’s role includes preparation and implementation of the Hydrological Monitoring and Mitigation Plan which constitutes a long-term monitoring program developed to determine if groundwater pumping effects flows in the adjacent Virgin River.

**Technical Manager — Gorman Post Ranch, Los Angeles County, California**

Mr. Thompson provided comprehensive aquifer and sustainable yield investigations, preparation of a Water Supply Assessment, groundwater recharge calculation, water quality, and regulatory consulting services in association with this proposed development.

**Project Manager — Green Valley County Water District, Los Angeles County, California**

Mr. Thompson directed the groundwater exploration and development program for this community in northern Los Angeles County. Work included regional exploration and well site selection, design/oversight of seismic surveys, installation of 900 ft bedrock well, including contractor oversight, permitting (including US Forest Service coordination), well logging, water quality testing, and wellhead treatment recommendations.

**Project Manager — City of Santa Clarita, Los Angeles County, California**

Mr. Thompson performed analysis and mitigation of flooding in a residential area caused by high surficial recharge rates that generate occasional high groundwater conditions. Project included hydrogeologic evaluation and well siting work leading to the installation of two monitoring wells, one new production well and retrofit of an existing production well to
allow dewatering and associated water level monitoring of groundwater conditions. Tasks included aquifer flow analysis, well permitting, contractor selection, well logging, water quality testing, performance testing, well design and completion, and overall project management.

Technical Oversight — Keystone Fruit Co., Riverside - Okanogan County, Washington

Mr. Thompson is responsible for hydrogeologic oversight and technical report preparation for the Tunk Creek Aquifer Test and Hydrogeologic Evaluation, which analyzed the groundwater-surface water interactions between the aquifer and creek.

Project Manager — Goleta Water District, Santa Barbara County, California

Mr. Thompson managed the feasibility study, design and grant funding application for well injection of potable water into six existing District wells for this aquifer recharge project. Grant was fully funded and was one of the two highest scoring applications submitted statewide for the early 2002 round of Proposition 13 Water Bond funding.

Permitting Support Projects

Water Resources Technical Lead — PEIR for Mosquito Vector Control Association of California Coastal Region, Alameda, Contra Costa, Marin, Sonoma, Napa, Solano and Santa Clara, San Mateo Counties, California

Mr. Thompson provided technical report preparation and impact analyses for the groundwater and water resources sections of the Programmatic EIR for this regional evaluation of the effects of continued implementation of a suite of pesticide application and other vector control strategies as prescribed in their respective Integrated Vector Management Programs.

Water Resources Technical Lead — Northwest Natural, Gill Ranch Gas Storage Project, Fresno and Madera Counties, California

As part of a Cardno ENTRIX team providing comprehensive permitting support (required by the CPUC) to Northwest Natural, and their partner PG&E, for this large gas storage project, Mr. Thompson provided water resources, discharge permitting, groundwater analyses and regulatory support. Key aspects of this work included preparation and submittal of “Notice of Intent” forms to the Central Valley Regional Board for anticipated water discharges associated with different aspects of the 27-mile long pipeline installation and hydrostatic testing. Discharges were permitted under a Board Order associated with discharges considered “Low Threat to Water Quality.” The primary hydrostatic testing involved 1 million gallons of water that was discharged across a fallow field.

Water Resources Technical Lead — California Department of Food and Agriculture (DFA), California

As part of the ENTRIX team preparing a programmatic EIR for the eradication of the light brown apple moth (Epiphyas postvittana) (LBAM) from affected counties within the state of California, Mr. Thompson provided analyses of potential stormwater runoff issues related to water quality and watershed effects associated with the various methods contemplated for eradication.

Water Resources Technical Lead — Sonoma County Permit and Resource Management Dept., Sonoma County, California

Mr. Thompson prepared water resources and water quality sections of the Preservation Ranch Environmental Impact Report (EIR) for this proposed 18,000-acre vineyard and restoration project in NW Sonoma County. Key project work required determination of
project impacts on water resources including groundwater, water quality, stormwater, TMDL’s and other water resources considerations. An initial component evaluated potential groundwater – surface water interactions by conducting a diagnostic pumping test to evaluate effects of pumping on flow in nearby springs.

Project Scientist — Metropolitan Water District of Southern California, California

Mr. Thompson provided water resources analysis and comprehensive GIS mapping products to evaluate water supply benefits in Imperial Valley area potentially derived from falling and crop water use reductions.

Project Scientist — Los Angeles Department of Water and Power, Los Angeles County, California

For Owens Valley Dust Mitigation program, provided permitting support for wetlands certification and dewatering discharge water quality compliance issues.

Project Manager — Gillibrand Aggregate Mine, Ventura County, California

Mr. Thompson is providing comprehensive aquifer investigation, safe yield investigations, water supply assessment development, groundwater-surface water interaction assessment, water quality, and regulatory consulting services in association with planned permit application to allow expansion of this facility in the Simi Valley area.

Stormwater Management/Permitting/TMDL’s

Project Administrator — Shea Homes RiverPark Development, Ventura County, California

Mr. Thompson is responsible for design and environmental analysis of stormwater treatment systems and numerous groundwater issues for this large (2,400+ homes and 2.5 million square feet of commercial development) southern California development that redeveloped an aggregate mine. Work included CEQA documentation, water rights assessments, groundwater-surface water interaction, evaluation of nitrate issues in groundwater, design and water quality modeling of robust stormwater treatment facilities, evaluation of future water quality constraints, re-abandonment of numerous oil wells, compliance with TMDL limitations, large-scale groundwater dewatering plan design and Regional Board permitting, monitoring well installation, water quality analysis of surface water-groundwater interactions, groundwater modeling and assessment of adjacent MTBE contaminated zones issues and impacts, and coordination with local agencies.

Project Scientist — County of Los Angeles, California

Team member for preparation of Los Angeles County Department of Public Works North Santa Monica Bay Watersheds (NSMBW) Regional Watershed Implementation Plan and the Malibu Creek Bacteria TMDL. Provided technical support regarding overview of the hydrogeology of the NSMBW and Malibu Creek watersheds, water quality model-based support for the development of structural and non-structural solutions, and municipal codes associated with stormwater quality.

Project Manager — TrinMark Development Partners - North Shore Mandalay Development, Ventura County, California

Developed stormwater water quality model and subsequent BMP design recommendations to establish compliance with City and State regulatory limits. Also provided long-term groundwater monitoring services for adjacent wetland mitigation parcel at McGrath State Beach, as required for project approvals.
Project Scientist — City of Los Angeles, Los Angeles County, California

Worked with the City’s Watershed Division in coordination with CREST (Cleaner Rivers Through Effective Stakeholder TMDL’s) to prepare stormwater pollutant load estimates in this highly urbanized Los Angeles area watershed, and the prediction of the impacts of various watershed management scenarios on in-stream water quality TMDLs. Project involved preparation of the Ballona Creek Bacteria TMDL, including work items such as devising various implementation options for achieving bacteria limits for three reaches of the Creek, understanding effects of potential implementation options, and evaluating the range of suggested options in relation to a series of goals and objectives.

Project Manager — M. Timm Development, Inc. - Mission Terrace Development, Carpinteria, Santa Barbara County, California

Developed a water quality management plan for site stormwater treatment and regulatory compliance.

Water Quality/Remediation/NRDA Projects

Project Manager — Turlock Irrigation District, Stanislaus County, California

Mr. Thompson managed the evaluation of potential water quality impacts to groundwater associated with a request to increase pumping for supply to the TID Walnut Energy Center power generation facility. Work involves development of predictive effects of increased pumping and reporting and negotiations with California Energy Commission staff to achieve amended operating conditions.

Hydrologist Specialist – Salton Sea Species Conservation Habitat Development, Brawley, California

For this complicated restoration project at the Salton Sea, Mr. Thompson provided water resources expertise and field-based technical support to evaluate infiltration characteristics of the areas proposed for flooding and groundwater recharge.

Water Column NRDA Technical Working Group Manager – BP Americas, Houston, TX

Mr. Thompson is on the Cardno ENTRIX NRDA team responding to the Deepwater Horizon accident in the Gulf of Mexico on behalf of BP. Mr. Thompson provides support to the Water Column and Deep Water Benthic Communities technical working groups, and participates in the design, implementation and reporting associated with NRDA studies.

Project Hydrogeologist — Portsmouth Gaseous Diffusion Facility, Portsmouth - Scioto County, Ohio

Mr. Thompson provided comprehensive aquifer analysis, multi-well pumping test analysis and hydrogeologic evaluation for input to stream remediation program targeted on historical DNAPL contamination.

Project Hydrogeologist — Savannah River DOE Site, Aiken County, South Carolina

Mr. Thompson provided comprehensive aquifer analysis, multi-well pumping test analysis and hydrogeologic evaluation for input to stream remediation program targeted on historical DNAPL contamination.
Litigation Support

- BrightSource Energy – Retained as expert witness to testify before California Energy Commission regarding potential impacts to groundwater at the proposed 500MW Hidden Hills Solar Electric Generating station in eastern Inyo County.
- Antelope Valley Groundwater Adjudication – Court-appointed Expert Witness currently retained for quantitative analysis of Small Pumpers Class historical water use.
- Sierra Club v. California American Water Co – Expert Witness retained by Cal Am to evaluate groundwater usage and effects on flows within the adjacent Carmel River related to fisheries 'take' issues triggered by Endangered Species Act law. Included evaluations of flows within the Carmel River to identify linkages between groundwater pumping (timing and rates) and flow (volume, depth, timing relative to migration).
- Southern California Edison (SCE) v. Sunrise Growers – Retained by SCE to provide Expert Witness services in evaluation of historical groundwater use and reporting case.
- Sleepy Valley Water Company v. Rainmaker Water Systems – Retained as expert witness for Sleepy Valley to provide technical support to water company and legal counsel in water rights evaluations of groundwater resource in a small basin with direct connection to the surface water of overlying Mint Canyon Creek, including preparation of a Water Availability Analysis; and testimony at Los Angeles County Regional Planning Board of Supervisors hearings.
- Ladd Construction v. Ventura County Public Works – Retained by Ventura County as Expert Witness to provide deposition and testimony in formal arbitration hearing related to technical and permitting issues on $6 million construction costs dispute.
- Santa Barbara Channel Keeper v. Venoco – Provided litigation support related to potential water quality issues associated with a proposed well drilling program.
- Keller et al v. DR Horton Homes – Deposed as a fact witness for land ownership lawsuit related to water resources and permitting-related technical matters associated with timing of entitlements associated with RiverPark Development in Oxnard, CA.
- Speikerman v. City of Avondale – Deposed as a fact witness for construction timing and delays lawsuit related to timing of design document, permitting completion and public agency review turn-around time issues on a $15 million construction project involving constructed wetlands, artificial recharge basins and residential development.

Due Diligence Support

Best Best Kreiger, Hidden Valley Ranch, Thousand Oaks, California

In support of pre-acquisition due diligence being conducted by Best Best Kreiger, Mr. Thompson conducted expert support services related to sustainability of groundwater supply, well reliability and long-term drought condition issues for this 60-acre property.

HerbThyme Farms, San Luis Rey River, Oceanside, California

In support of pre-acquisition due diligence being conducted by The Riverside Company, Mr. Thompson conducted expert review and support services related to water supply alternatives, water rights, surface water-groundwater interaction and reverse-osmosis treatment system design alternatives and costs.

Teasdale Quality Foods, Atwater, California

In support of pre-acquisition due diligence, Mr. Thompson conducted expert review and support services related to this cannery's groundwater production including: reliability of...
yield, integrity of well and pumping facilities, vulnerability to groundwater contamination issues impacting clients’ wells, Regional Water Quality Control Board NPDES permitting considerations for facility effluent, considerations related to partial conversion to City water supplies, and cost analysis of various physical and institutional water supply alternatives.

Las Posas Basin, Moorpark, California

In support of a confidential client’s interest in developing water rights investment opportunities, Mr. Thompson conducted extensive analyses of groundwater recharge options in an over-drafted portion of this large southern California groundwater basin for determination of groundwater recharge volumetric potential and water rights investment opportunities. Evaluation involved review and analysis of existing and planned wells, water quality, water rights and groundwater modeling conducted by USGS and Ventura County.

Calpine Company, California

Mr. Thompson provided due diligence support for Calpine Company’s efforts to consider bidding on a partially-permitted power plant site in Redlands, California. Conducted analysis of groundwater production potential, available surface water supplies, permitting issues and water quality aspects that were critical to evaluating costs and timelines for installation and operation of a proposed 500 MW power plant. Expertise and familiarity with general water issues, groundwater conditions, regulatory per permitting requirements and local agencies provided a highly valuable resource to Calpine in their due diligence process.

Calpine Company, Hudson, Colorado

Technical services were provided by Mr. Thompson to Calpine for due diligence of a water supply option to cool a proposed 500MW power generating station to be built near Hudson, CO. Work included development and evaluation of conceptual design, feasibility studies, permitting, and engineering cost schedules.

Chino Basin, San Bernardino County, California

Mr. Thompson provided technical analysis, permitting evaluation and agency coordination for investor-funded projects focused on opportunities for recharge of imported or local water supplies into the adjudicated Chino Basin. Efforts included lease agreement for a 200-acre parcel in Fontana for potential groundwater recharge of treated effluent from a nearby municipal facility. Due diligence investigations included site recharge performance testing, 4-mile pipeline routing, water quality considerations, regulatory considerations, Chino Basin adjudication aspects, acquisition of viable recharge credits, and financial and economic projections.

Summit Engineering, Reno, Nevada

Mr. Thompson conducted detailed groundwater recharge calculations for investor-based Eco-Vision project encompassing entire northern half of State of Nevada. Developed robust GIS-based methodology to calculate natural recharge to the numerous vast groundwater basins from natural precipitation, including considerations of 30+ years of rainfall, snowpack, runoff and evapotranspiration data. Developed a modified approach to the soil-moisture balance technique to determine long-term recharge amounts in support of demonstrating to Nevada Division of Water Resources State Engineers Office the presence of surplus, un-allocated groundwater. Project concept included intention to wheel water down Humboldt River for sale to potential buyers in Reno and Carson City areas.

Burlington Northern-Santa Fe InterModal Railroad Yard, San Bernardino, California

Mr. Thompson conducted detailed evaluations of groundwater basin characteristics, groundwater development options, water quality, well field design and water rights for an investor-supported groundwater development program in the Bunker Hill basin area of San
Bernardino. Project included determination of potential groundwater production rates and valuation for potential resale of water to other entities.

**Western Water Company, San Diego, California**

Mr. Thompson provided technical expertise in hydrogeology and groundwater resource analysis to this water investment company on a range of diverse projects. Conducted evaluations of groundwater basin capacity, groundwater banking, and water transfers for many projects throughout California and the southwestern US. Expertise in basin analysis and groundwater resource issues was combined with GIS tools for most project investigations. Work commonly coordinated a variety of information sources including research from the U.S. G.S., other consultants, and the work of public agencies that were commonly program partners. Projects included evaluations of water supply privatization, wastewater re-use, and alternative uses for existing groundwater resources.

**Oil & Gas Exploration**

- Merrill Avenue Gas Field Discovery – Member of UNOCAL exploration team for discovery of a new gas field in northern San Joaquin Valley. Discovery well and development wells identified the “Merrill Avenue gas field.” Duties included stratigraphic analysis using well logs, seismic data interpretation and collaboration with paleontology team.
- Oil and Gas Exploration – Geologic and geophysical analyses in preparation for then-pending offshore lease sales and Central Valley opportunities as part of UNOCAL’s technical team.
- Oil and Gas Development – Conducted project management, drilling oversight and reporting during well installation efforts at numerous UNOCAL oil and gas wells, including Santa Barbara County offshore platforms and exploration drill ships, western Kern County oil fields, Santa Maria - Guadalupe, etc.
- West Coast Oil and Gas Field Research – Technical analysis, basin analysis, report research and preparation for confidential industry reports associated with near-shore oil fields and offshore California lease sale preparations, focused on northern and central California potential oil and gas fields, including offshore Santa Barbara County, Mendocino County, and Humboldt County.
- Coastal California Monterey Formation Research – Field mapping and analysis of Monterey Formation and adjacent units in Point Arena area of northern California for Mobil Oil Corporation.

**Published Papers**


> Bachman, S.B., N.N. Brown, T.J. Thompson, and N. Larsen, 1994, "Using a GIS in..."


Comment Letter 15: Cardno Entrix, February 3, 2014

Response to Comment No. 15-1

The comment identifies that Mr. Thompson (commenter) was retained by R.D. Olson Development (Applicant) to provide expert technical assistance with regard to the proposed project. The commenter has reviewed the EIR and offers the following comments regarding the EIR’s water supply and water quality analysis.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-2

The comment notes that EIR Sections 4.8, Hydrology and Water Quality, and 4.13, Utilities and Service Systems, analyze potential water supply impacts appropriately based on available technical reports and planning documents as well as the Santa Barbara County, Case No. SM57969 (the “Wright Judgment”) application to the Goleta Water District’s groundwater supply.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-3

The comment notes that all water supply sources are identified and summarized in EIR Table 4.13-3, Summary of Current and Projected Water Supplies. The comment notes the local sources as Lake Cachuma and the Goleta Groundwater Basin, and that imported water supplies come from the State Water Project. The comment also outlines GWD’s priorities of using these supplies to maximize supply availability, minimize costs, and ensure reliability of future supplies.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-4

The comment provides additional discussion of GWD’s entitlement of 9,322 acre feet per year (AFY) of Cachuma water. The comment notes that this information is also provided in the EIR.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
Response to Comment No. 15-5

The comment provides additional discussion of GWD’s entitlement of 7,000 AFY of State Water, plus an additional allocation of 450 AFY through the Central Coast Water Authority’s Drought Buffer. The comment outlines that the Safe Water Supplies Ordinance (SAFE Ordinance) must be considered when applying applicable requirements for planning.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-6

The comment provides additional discussion of GWD’s entitlement of 2,350 AFY of groundwater from the Goleta groundwater basin, and the implications of the Wright Judgment, which establishes the GWD’s ability to store water to ensure that the Goleta groundwater basin is maintained in a hydrologically balanced condition.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-7

The comment discusses the SAFE Ordinance, which is an operational plan for the GWD and helps to ensure the availability of sufficient groundwater supplies during a drought by establishing limitations on GWD’s use of the basin, depending on water levels.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-8

The comment discusses the current conditions of the Goleta groundwater basin. The Goleta groundwater basin is not in a state of overdraft and, as of May 2011, has experienced the highest water table recorded. The comment also discusses the GWD groundwater production wells. The GWD currently has five operational groundwater production wells with an extraction and treatment capacity of 300 acre feet per month, or 3,600 AFY. The wells are not proposed to be used for the project’s future demand and are subject to SAFE limitations if demand changes.

The comment substantiates the water supply analysis and agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
Response to Comment No. 15-9

The comment discusses recycled water that serves GWD non-potable demands. Recycled water is a constant water source and the GWD may seek utilization of the supply. Currently, the GWD delivers between 1,000 and 1,150 AFY of recycled water.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-10

The comment notes that the EIR takes into account GWD’s supplies in different hydrologic conditions of “normal,” single dry,” and “multiple dry” years as well as climate change.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-11

The comment reiterates the EIR discussion of GWD’s projected water demands, specifically the basis of the 2010 UWMP and the moderate and high estimates. The comment also notes that while the Final EIR for the Goleta General Plan/Coastal Land Use Plan includes demand projections for GWD that are slightly more than the 2010 UWMP’s moderate estimate and slightly less than the high estimate, it was based on the GWD’s 2005 UWMP. Additionally, Santa Barbara County has recently projected GWD’s future water demand to be lower than the 2010 UWMP projections.

The comment substantiates the water supply analysis and supports the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-12

The comment outlines the water supply and demand information found in the technical studies and reports referenced in the EIR. The comment also details how the EIR concluded that GWD has sufficient supply to accommodate the proposed project.

The comment substantiates the water supply analysis and supports the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
Response to Comment No. 15-13

The comment outlines the EIR analysis and impacts related to the availability of water supply and hydrology of the project site. The comment supports the conclusion in the EIR that the proposed project would have less-than-significant impacts on the availability of water supply and hydrology.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-14

The comment reiterates that the EIR concludes the proposed project would not substantially deplete groundwater supplies and the role of the Wright Judgment (see Response to Comment Nos. 15-6 and 15-7), the SAFE Ordinance, and GWD’s use of groundwater.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-15

The comment summarizes the EIR’s cumulative impacts analysis and the adequacy of GWD’s project water supplies to serve the City’s full buildout.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-16

The comment outlines and confirms the adequacy of the EIR analysis of water quality impacts.

The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-17

The comment outlines and confirms the effectiveness of the water quality impact mitigation measures in the EIR.
The information provided in the comment was previously included in the EIR and the comment agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 15-18

The comment confirms that the aquifer beneath the project site is protected by a regional confining layer, which substantially inhibits percolation of onsite surface water (degraded or not) into the deeper aquifer.

The comment substantiates the analysis and agrees with the findings in the EIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
Law Office of Marc Chytilo

Environmental Law

February 3, 2014

Ms. Natasha Heifetz Campbell
City of Goleta
130 Cremona Drive, Suite B
Goleta, California 93117

By Email: njcampbell@cityofgoleta.org

RE: Marriott RDEIR Comments

Ms. Heifetz Campbell:

Please accept the following supplemental comments on behalf of Friends of Saspili concerning traffic issues in the RDEIR for the Marriott Hotel project.

1) Different Trip Rates for Proposed Project – While the project was and still is identified as a Marriott Residence Inn, the 2008 work identified it as a “Hotel” for trip generation purposes and calculated trips based on the 140 rooms proposed at that time. Trip rates from ITE Trip Generation 7th Edition published in 2003 were used since that was the most current source at that time. The peak hour trip rates for “Hotel” changed in the 9th Edition. In the 2013 Revised Draft EIR and the supporting 2011 traffic study, the proposed project used a different land use category from ITE – an “All Suites Hotel”. Page 4.12-7 of the Revised DEIR states “After reviewing the various land use codes in the ITE Manual for Hotels, the City’s Community Services District staff determined that the ‘All Suites Hotel, Land Use Code 311’ best reflects the Marriott Residence Inn’s design and operations, including the ‘extended stay’ hotel type proposed.” It is very unusual to change the land use type and the associated trip rates when revising a traffic study, and these changes need to be justified and considered since the analysis relies on a number of prior analyses that utilized the earlier classifications.

2) Traffic Counts Are Old and Outdated – The February 2013 Revised DEIR relies on the October 2011 traffic study which used traffic counts made between 2005 and 2010 at the intersections studied, and some of the 24 hour traffic volume counts date back to 2003. Table 4.12-2 on Page 4.12-9 of the Revised DEIR compares historical PM peak hour volumes at Storke/Hollister and at Fairview/Hollister between 2004 and early 2010. Without presenting any factual traffic count data since early 2010, the Revised DEIR relies on Table 4.12-2 to conclude that “…traffic volumes at many intersections in the City have been generally declining since the beginning of the economic recession, indicating that the older counts are more conservative.” Accepted traffic engineering practice published by ITE for traffic studies recommends that traffic counts be no more than one year old to establish a proper baseline for analysis. Caltrans requested that the traffic count data be no more than two years old in their January 2008 letter.

Marc Chytilo
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Phone: (805) 658-0568 • Fax: (805) 658-2179
Email: Marc@Lomcsb.com
that was resubmitted in response to the Revised DEIR NOP in July 2009. Even the most recent traffic counts evaluated in the traffic study were made in March 2010, and they are nearly 4 years old. As it is now, traffic counts were made in different seasons over many years and there was no attempt made to bring them all to a common and current baseline. Furthermore, the traffic counts at adjacent intersections were not compared to each other to determine if the volumes leaving one intersection arrive at the next intersection. The traffic data must be updated, better synthesized and the Project’s impacts assessed thereon.

3) Traffic Volumes from Other Development Projects – The Revised DEIR includes lists of related projects on Pages 3-2 through 3-7 in the City of Goleta, City of Santa Barbara, and County of Santa Barbara. Page 3-2 indicates the traffic study was prepared based on a list of projects “…that was current at the time the traffic study for the project was prepared” but the project list used by the October 2011 traffic study is not provided in either the Revised DEIR or the traffic study. At minimum, the list that used by October 2011 traffic study must be provided and cross-checked against the list in the Revised DEIR and the most current approved and pending project list that was relied on to support the Revised DEIR’s statement on Page 3-2 that “…the list used in the traffic study represents an accurate and reasonable ‘worst case’ projection…”

4) Mitigation Measures – Mitigation measures are included in either the Revised DEIR or the traffic study (but not both) as follows:

   a. Restriping Robin Hill Road at the Hollister Avenue Intersection – The Revised DEIR recommends restriping on Robin Hill Road to provide one left turn lane and one right turn lane but the traffic study does not.

   b. Construct Bus Pocket – The Revised DEIR recommends constructing improvements at the existing bus stop on the north side of Hollister Avenue west of La Patera Lane but the traffic study does not.

   c. Construct Raised Median On Hollister Avenue – The traffic study recommends construction of a raised median on Hollister Avenue to limit vehicle access to left in, right in, and right out at the new driveway but the Revised DEIR does not. The site plan shows completion of the raised landscaped median on Hollister Avenue from Robin Hill Road to La Patera Lane. The City boundary along Hollister Avenue in this area is not clearly identified or located in the Project or traffic documents. If the entire roadway is in the City of Santa Barbara or if the City boundary is down the center of the Hollister Avenue roadway, then the raised median construction must be approved by the City of Santa Barbara (not just the City of Goleta). The raised median (rather than just the painted median that exists) is a necessary mitigation measure according to the traffic study and the permitting authority should be specified.
d. Goleta Transportation Improvement Program (GTIP) Fees – The traffic study recommends payment of fees to construct various improvements in the City and indicates a portion of those fees can be used in the future to install a traffic signal at Hollister Avenue and Robin Hill Road. The fee program is not available on-line and we are unable to determine if the future traffic signal on Hollister Avenue at Robin Hill Road is included in the GTIP. The failure to properly articulate the City boundary precludes informed public comment on this and related issues.

The traffic study appendices do not include the cumulative calculations of LOS and those should be provided. Further, the traffic study and the Revised DEIR do not provide figures that illustrate the turning movement volumes at intersections that are typically found in traffic studies.

It is very unusual that the City would allow their own former Traffic Engineer that advised the City on this particular project in 2008 to change hats and work directly for the applicant on the same project and concerning a follow up to the adequacy of his prior analysis. We question whether there has been an independent analysis of this project’s traffic impacts and request that an independent qualified traffic engineer review the traffic issues, analysis and conclusions.

The City’s General Plan and its EIR relied on two non-ramp overcrossing structures (generally at Ellwood and Padera Lane) that would partially mitigate significant impacts from congestion at other Goleta intersections, including Fairview and Hollister and Storke and Hollister, by further distributing traffic away from the highly congested intersections. These overcrossings are not completed, planned, or even funded. There is no identifiable construction date for either of them. In the mean time, the City has approved and is considering other projects that would directly and substantially impact the intersections of concern to the General Plan’s traffic analysis. How is the City planning to achieve the traffic congestion relief that is counted on being provided by these two overcrossings if they are not built, or are further delayed in construction?

We look forward to the City’s responses to these comments.

Sincerely,

Marc Chytilo
Comment Letter 16: Law Office of Marc Chytilo, February 3, 2014

Response to Comment No. 16-1

The comment questions the traffic generation factor used in the traffic study and EIR. The comment identifies that the 2008 EIR used the “Hotel” land use category while the current EIR uses the “All Suites Hotel” land use category. The comment states that it is unusual to change land use categories when revising a traffic study and the change needs to be justified.

The current 118-room Marriott Residence Inn project has been processed as a new project, unrelated to the 140-room Marriott Residence Inn project, which was approved in November 2008 and approval of which was rescinded in July 2009. A traffic study was completed in October 2011 by AllianceJB (Jim Biega, Traffic Engineer) for the 118-room hotel project, under contract with the City of Goleta. As part of the traffic analysis for the 118-room project, the assumptions and descriptions of a number of ITE Manual (8th Edition) Land Use Codes applicable to hotel uses were considered, including Hotel (310), All Suites Hotel (311), Business Hotel (312), Motel (320), and Resort Hotel (330). After reviewing each of the Land Use Code descriptions and comparing these to the proposed 118-room, extended stay, Marriott Residence Inn all-suite hotel project, Public Works and AllianceJB determined that the All Suites Hotel, ITE Land Use Code 311, most closely matched the proposed project and would provide the best estimate of project-related traffic. In particular, the All Suites Hotel Land Use Code accounts for the Marriott Residence Inn’s larger suite room design and presence of kitchen facilities, fewer hotel services, and lack of an onsite restaurant, retail stores, banquet facilities, or large meeting room spaces for conventions.

The comments have been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 16-2

The comment addresses the date of traffic counts used in the traffic study.

The City’s traffic experts (Public Works and AllianceJB) determined that the counts used in FEIR Section 4.12 (including Table 4.12-1) were more conservative than using more recent count data and, therefore, the traffic impacts in the RFEIR represent a reasonable worst-case scenario. This conclusion is supported by information provided to the City in a letter from Associated Transportation Engineers (ATE) dated April 22, 2014 (Appendix Z). The ATE letter includes updated roadway and intersection traffic data collected by the City of Goleta in 2013, which was compared to data in Tables 4.12-1 and 4.12-3 of the project EIR. The data shows that the more recent 2013 volumes in the Storke Road and Los Carneros Road corridors are lower than the older data used in the RFEIR. In summary, the traffic data used in the RFEIR and the conclusions regarding impacts to area roadways and intersections represent a reasonable worst-case analysis, as required by CEQA. The EIR is revised to include the following text and Tables ATE-1 through ATE-4, summarizing the comparison traffic data in the April 2, 2014 ATE letter.

Page 4.12-9, following Table 4.12-2, Count Data Comparisons, is revised as follows:

In a letter from Associated Transportation Engineers (ATE) dated April 22, 2014 (included as Appendix Z of the Revised Final EIR), traffic count data from 2013 is
compared to the older traffic count data used in the RFEIR Part 1, Section 4.12, Tables 4.12-1 and 4.12-3. The data in Tables ATE-1 and ATE-2 of the ATE letter (included below) confirm that the traffic volumes used in the Marriott project traffic study are conservative, as the newer 2013 volumes on both the Storke Road and Los Carneros corridors are lower than the volumes used in the project traffic study.

**TABLE ATE-1**
ROADWAY VOLUME COMPARISON

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>Marriott Study</th>
<th>2013 City Counts</th>
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<tbody>
<tr>
<td>Los Carneros Rd between Mesa Rd and Hollister Ave</td>
<td>20,237 ADT</td>
<td>15,337 ADT</td>
</tr>
<tr>
<td>Los Carneros Rd between Calle Koral and Hwy 101 SB Ramps</td>
<td>24,458 ADT</td>
<td>22,031 ADT</td>
</tr>
</tbody>
</table>

**TABLE ATE-2**
PM PEAK HOUR TRAFFIC VOLUME AND LEVEL OF SERVICE COMPARISON

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Marriott RDEIR</th>
<th>2013 City Counts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Entering Volume</td>
<td>Existing LOS</td>
</tr>
<tr>
<td>Storke Rd/Hollister Ave</td>
<td>4,505</td>
<td>0.739/LOS S</td>
</tr>
<tr>
<td>Los Carneros Rd/Hwy 101 NB Ramps</td>
<td>1,758</td>
<td>0.532/LOS A</td>
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<tr>
<td>Los Carneros Rd/Hwy 101 SB Ramps</td>
<td>2,660</td>
<td>0.775/LOS C</td>
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<tr>
<td>Los Carneros Rd/Calle Koral</td>
<td>2,543</td>
<td>0.706/LOS C</td>
</tr>
<tr>
<td>Los Carneros Rd/Hollister Ave</td>
<td>2,956</td>
<td>0.673/LOS B</td>
</tr>
<tr>
<td>Fairview Ave/Hollister Ave</td>
<td>3,533</td>
<td>0.678/LOS B</td>
</tr>
<tr>
<td>Fairview Ave/Hwy 101 NB Ramps</td>
<td>2,964</td>
<td>0.777/LOS S</td>
</tr>
</tbody>
</table>

With regard to cumulative traffic volumes, the traffic model used for the Marriott traffic study was run on January 5, 2010. The traffic model was based in part, on the City of Goleta’s December 2009 cumulative projects list. (The ATE letter incorrectly identifies a 2011 traffic model run; however, the letter uses the correct Marriott traffic study traffic volumes in Tables ATE-3 and ATE-4, included below.) The data in Tables ATE-3 and ATE-4 of the ATE letter show that cumulative traffic volumes are similar to the most current 2014 cumulative traffic forecast volumes and would not result in changes to the conclusions of the traffic study.

**TABLE ATE-3**
CUMULATIVE ROADWAY VOLUME COMPARISON

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>Marriott Study</th>
<th>2014 Model Run</th>
</tr>
</thead>
<tbody>
<tr>
<td>Los Carneros Rd between Mesa Rd and Hollister Ave</td>
<td>22,411 ADT</td>
<td>22,900 ADT</td>
</tr>
<tr>
<td>Los Carneros Rd between Calle Koral and Hwy 101 SB Ramps</td>
<td>34,456 ADT</td>
<td>32,200 ADT</td>
</tr>
</tbody>
</table>
TABLE ATE-4
PM PEAK HOUR TRAFFIC VOLUME AND CUMULATIVE LEVEL OF SERVICE COMPARISON

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Marriott Study Cumulative LOS</th>
<th>2014 Model Run Cumulative LOS</th>
<th>Project-Added V/C</th>
<th>Impact (Yes/No)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Los Carneros Rd/Hwy 101 NB Ramps</td>
<td>0.651/LOS B</td>
<td>0.676/LOS B</td>
<td>0.003</td>
<td>No</td>
</tr>
<tr>
<td>Los Carneros Rd/Hwy 101 SB Ramps</td>
<td>0.813/LOS D</td>
<td>0.878/LOS D</td>
<td>0.000</td>
<td>No</td>
</tr>
<tr>
<td>Los Carneros Rd/Calle Koral</td>
<td>0.883/LOS D</td>
<td>0.888/LOS D</td>
<td>0.003</td>
<td>No</td>
</tr>
<tr>
<td>Los Carneros Rd/Hollister Ave</td>
<td>0.810/LOS D</td>
<td>0.726/LOS C</td>
<td>0.002</td>
<td>No</td>
</tr>
</tbody>
</table>

Response to Comment No. 16-3

The comment questions why the traffic study did not compare volumes leaving one intersection and arriving at the next intersection.

In order to track vehicles from one intersection to the next, the same peak hour must be used (or volumes extrapolated) for all evaluated intersections. However, traffic volumes at the various study area intersections do not always experience the same peak hour. The project traffic study used the highest hourly volumes for each location, consistent with a reasonable worst-case analysis for CEQA purposes. Therefore, traffic data in the RFEIR represent reasonable worst-case traffic volumes.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 16-4

The comment states that the traffic study should provide a list of the cumulative projects analyzed so a comparison can be made against the list provided in the EIR.

The cumulative analysis in the AllianceJB traffic study relied on data from a January 5, 2010 City of Goleta cumulative traffic model run, which was prepared by Jim Damkowitch of Kittelson & Associates. The list of development projects and growth rates used in the traffic model are included in the updated Traffic Evaluations Report, included as Appendix P, which replaces Appendix P of the Revised Draft EIR and the RFEIR Part 1. The December 2009 City of Goleta Cumulative Projects List is one of the components considered in the cumulative traffic model to account for cumulative traffic on area roadways.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 16-5

The comment identifies new striping at the Robin Hill Road intersection southbound approach to Hollister Avenue, which is not required in the traffic study.

The initial analysis of this intersection, using the Highway Capacity Manual methodology, identified an impact at this intersection and recommended new striping, resulting in a net improvement of the LOS at this intersection, compared to existing LOS (using the Highway
City of Goleta Marriott Revised Final EIR Part 2
Chapter 3. Comments and Responses

Capacity Manual methodology), even with the added project traffic. The traffic section of the RFEIR (RFEIR Part 1, page 4-12.4, excerpt below) clarifies that this intersection currently operates at an acceptable LOS and would continue to operate at an acceptable LOS with the addition of project traffic.

"Unsignalized stop-controlled intersection LOS was initially calculated for the Robin Hill Road/Hollister Avenue intersection using the Highway Capacity Manual (HCM) unsignalized intersection methodology (which relates the worst-case movement delay in seconds/vehicle to an LOS); however, a review of actual intersection delay observations and overall intersection operational conditions at the Robin Hill Road/Hollister Avenue intersection indicated that the HCM worst-case movement LOS portrayed unrealistically poor intersection operational conditions. Review of these observations in coordination with City staff indicated that the overall intersection operational conditions would be better represented by calculating the overall intersection V/C ratio and relating it to an overall intersection LOS. The LOS results for the intersections studied are shown in EIR Tables 4.12-3 and 4.12-5."

The restriping at the Robin Hill Road approach to the intersection at Hollister Avenue would improve intersection operations to offset project-related increases in traffic to this intersection. Restriping is assumed to be part of the project description. Mitigation measure MM TRA-1a is included in the EIR to ensure implementation of this aspect of the project description to the satisfaction of Public Works.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 16-6

The comment questions why the bus pocket is identified as a required mitigation measure, when it is not identified in the traffic study.

The new bus pocket is included on the project improvement plans. The discussion in Section 4.12 of Impact TRA-3, Public Transit/Alternative Modes of Transportation, is therefore revised to clarify that this improvement is part of the project description. Mitigation measure MM TRA-3a is included in the EIR to ensure implementation of this aspect of the project description to the satisfaction of MTD, City of Goleta Public Works, and City of Santa Barbara Public Works (the latter given bus pocket location within the City of Santa Barbara right-of-way):

**Impact TRA-3. Public Transit/Alternative Modes of Transportation**

The existing MTD bus stop on the project’s frontage at the northwest corner of Hollister Avenue and La Patera Lane would be enlarged and improved to a bus pocket, as shown on the project plans. This public transit upgrade is also required to facilitate use of alternative transportation, accommodating both existing demand and additional demand generated by the project. The bus pocket would allow continued traffic flow on Hollister Avenue while bus passengers are being loaded and unloaded at this stop. If the pocket is not located to adequately allow for safe vehicular and pedestrian use of the nearby intersection, then safety issues could result. Therefore, until final design elements are

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1 See Section 4.12.3.1, Threshold f.
determined to be acceptable, potential project impacts associated with public transit are considered to be potentially significant.

MM TRA-3a is revised to include City of Santa Barbara review and approval given the bus pocket location within the Hollister Avenue right-of-way, as follows:

**MM TRA-3a. Construct a Hollister Avenue Bus Pocket**

A bus pocket will be constructed on Hollister Avenue in the vicinity of the existing bus stop. The bus pocket will be constructed to City of Goleta and City of Santa Barbara standards as determined appropriate by City of Goleta and City of Santa Barbara Public Works staff.

**Plan Requirements and Timing:** Bus stop improvements will be shown on project improvement plans. Bus pocket improvements will be reviewed and approved by Planning and Environmental Services City of Santa Barbara and City of Goleta Public Works, and MTD prior to land use permit issuance before the City issues any grading or construction permits. Improvements will--must be installed prior to occupancy clearance before the City issues certificates of occupancy.

**Monitoring:** City of Goleta and City of Santa Barbara Public Works staff will site inspect to ensure installation of the required bus pocket prior to--before the City issues certificates of occupancy clearance.

In addition, as part of the project’s frontage and access improvements, the required improvements to the bus stop are covered in Mitigation Measure TRA-4a, which requires final improvement plans to be consistent with preliminary improvement plans, including plans for frontage improvements, access, and internal circulation. Mitigation measure MM TRA-4a is also revised to specifically include the bus stop improvement, as follows:

**MM TRA-4a. Ensure that Improvement Plans Are Consistent with Preliminary Improvement Plans**

Final project improvement plans will--must be consistent with preliminary improvement plans.

**Plan Requirements and Timing:** Final plans will--must include frontage improvements, the three new medians in Hollister Avenue, access, bus stop/pocket, new landscaping along frontage areas and medians, and internal circulation consistent with preliminary improvement plans. Final plans will--must be reviewed and approved by City of Goleta Public Works, City of Santa Barbara Public Works (as applicable), staff and the County Fire Department prior to--before recordation of the Parcel Map and prior to--before the City issues any permits for grading land use permit issuance and initiation of earthwork for the above improvements, as applicable.

**Monitoring:** City staff will--must site inspect periodically to ensure compliance with approved final project improvement plans.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.
Response to Comment No. 16-7

The comment addresses the raised median, its inclusion as a mitigation measure, and City of Santa Barbara review of Hollister Avenue improvements.

The City of Goleta/City of Santa Barbara boundary is shown on the Revised Draft EIR Figure 2-18 (Hollister Avenue Plan). The City of Goleta Public Works’ condition letter (August 13, 2013) requires City of Santa Barbara review of median improvements in Hollister Avenue: “Restriping, median improvements, and turn pockets as approved by the City of Santa Barbara Public Works Director and other approving bodies, as necessary.” In addition, mitigation measure MM TRA-4a is revised to add City of Santa Barbara review and approval of improvement plans. See Response to Comment 16-6 above for revised mitigation measure MM TRA-4a language.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 16-8

The comment addresses GTIP fees, GTIP projects, and funding of a traffic signal at Hollister Avenue/Robin Hill Road intersection.

The traffic study concludes that the project would not generate the need for a signal at this intersection based on anticipated project-generated traffic volumes and the particular roadway characteristics (e.g., nearby signals at Aero Camino and La Patera create gaps in traffic on Hollister Avenue at the Robin Hill Road intersection). The traffic study has been amended and replaces Appendix P of the Proposed Final EIR. The October 2011 AllianceJB report concludes that the project will not generate significant impacts during the AM or PM peak hours at the study area intersections. However, there is an inconsistency in the report because Conclusion #3 of the report recommends both retaining the stop sign controlled intersection at the Robin Hill Road/Hollister Avenue intersection, and goes on to describe potential installation of a traffic signal at the Robin Hill Road/Hollister Avenue intersection “at some point under future cumulative conditions.” The City determined that a signal at this intersection is not currently required and is not expected to be needed under cumulative conditions, based on traffic modelling of cumulative traffic volumes. This conclusion would only change if unanticipated considerable increases in traffic volumes from new development substantially exceeding General Plan expectations is directed to Robin Hill Road. This level of new development would be subject to additional traffic studies as part of the development review process, including identification of necessary mitigation to address project traffic impacts. Therefore, with regard to the Marriott Residence Inn/Hollister Center project, Public Works advised against inclusion of a mitigation measure requiring signalization of this intersection and the AllianceJB study has been revised to correct this inapplicable recommendation.

A list of current GTIP projects is available for review at City of Goleta Planning and Environmental Review, upon request. The City of Goleta evaluates traffic at City roadways and intersections as new development occurs at varying paces, at different locations of the City, at different times, and with differing levels, types, and peak hours of increased traffic volumes. Although project-generated traffic is not expected to result in any significant impacts to area roadway segments or intersections in the existing or cumulative setting, the project would contribute incrementally to increased traffic on the area street network. Therefore, the project is subject to payment of development impact fees, including GTIP fees, which, combined with other revenue sources, fund future roadway improvements in the City of Goleta. The City of
Goleta/City of Santa Barbara boundary is shown on Revised Draft EIR Figure 2-18 (Hollister Avenue Plan).

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 16-9

The comment states that the traffic study appendices do not include the cumulative calculations.

The cumulative LOS calculation details are included in the updated project traffic study (Appendix P). No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 16-10

The comment states that the traffic study and EIR do not provide figures that illustrate the turning movement volumes at intersections.

The updated project traffic study (Appendix P) includes the intersection turning movement volumes in tabular form in the Exhibits and Worksheets section.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 16-11

The comment questions why the City’s former traffic consultant was hired by the applicant.

The City contracted with AllianceJB to prepare traffic studies needed for reviewing the project. The selection of AllianceJB as the City’s traffic consultant was made based upon its reputation and experience within the industry. The City’s analysis and evaluation of AllianceJB’s work product was accomplished independently from the applicant. As with every other aspect of the RFEIR, the City exercised its own independent judgment regarding the environmental analysis within the RFEIR.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.

Response to Comment No. 16-12

The comment addresses two non-ramp over-crossings identified in the General Plan.

The cumulative traffic model assumptions used for the project traffic evaluation assumed construction of only the Ellwood area over-crossing, while also incorporating full cumulative traffic. Therefore, the traffic model assumptions are considered conservative. The need to implement all roadway improvements identified in the General Plan is triggered by the timing, pace, and location of development. As development occurs and there are incremental changes to traffic, the City considers how to prioritize the improvements. In addition to the pace and location of development and the timing for associated payment of GTIP fees, funds for constructing the various roadway improvements can also be affected by the availability of
matching funds, grants, and other funding mechanisms. Based on the project traffic review, long-term traffic generated by the project is not expected to exceed the City’s project-specific or cumulative traffic thresholds of significance.

The comment has been noted for the record. No additional changes to the Revised Draft EIR (October 2013) or RFEIR Part 1 are warranted.