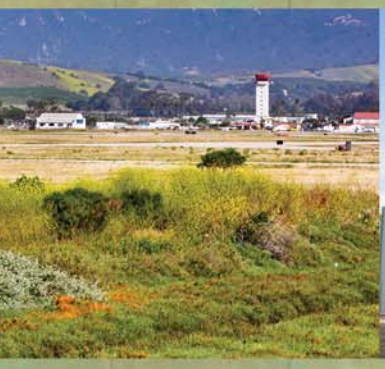
FINAL

PROGRAM ENVIRONMENTAL IMPACT REPORT

ON THE PROPOSED AIRPORT MASTER PLAN

SCH# 2014061096






Santa Barbara Airport

JULY 2017

SANTA BARBARA AIRPORT

Final

PROGRAM ENVIRONMENTAL IMPACT REPORT
On the Proposed Airport Master Plan

for

SANTA BARBARA MUNICIPAL AIRPORT
Santa Barbara, California

Prepared by:

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Prepared for:

City of Santa Barbara

July 2017

CONTENTS

SANTA BARBARA MUNICIPAL AIRPORT
Santa Barbara, California

Final
PROGRAM ENVIRONMENTAL IMPACT REPORT
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PREFACE

EXECUTIVE SUMMARY

ES1.0 INTRODUCTION ES-1
ES2.0 PROJECT DESCRIPTION ES-2
ES3.0 REQUIRED DISCRETIONARY ACTIONS AND OTHER AGENCY APPROVALS ES-3
ES4.0 PROJECT ALTERNATIVES ES-5
ES5.0 SUMMARY OF IMPACTS AND MITIGATION ES-7
ES6.0 PUBLIC AND AGENCY REVIEW OF THE DRAFT AND RECIRCULATED DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORTS ES-19

Chapter One
INTRODUCTORY INFORMATION

1.1 INTRODUCTION 1-1
1.2 RELATIONSHIP TO CITY OF SANTA BARBARA GENERAL PLAN 1-2
1.3 INITIAL STUDY FINDINGS AND ENVIRONMENTAL SCOPING 1-3
1.4 PUBLIC AND AGENCY REVIEW OF THE DRAFT AND RECIRCULATED DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORTS 1-5

Chapter Two
PROJECT DESCRIPTION

2.1 PROJECT OBJECTIVES 2-1
2.1.1 Forecast Aviation Activity 2-2
2.2 PROJECT DESCRIPTION 2-2
2.2.1 Recommended Development Concept Overview 2-3
2.2.2 Proposed Capital Improvement Plan 2-6
2.3 REGIONAL SETTING 2-7
2.4 REQUIRED DISCRETIONARY ACTIONS 2-7
2.5 ~~OTHER PUBLIC AGENCY APPROVALS REQUIRED~~DISCRETIONARY ACTIONS REQUIRED FOR FUTURE AIRPORT PROJECTS RECOMMENDED BY THE AIRPORT MASTER PLAN 2-8

Chapter Three
PROJECT ALTERNATIVES

3.1 SUMMARY OF THE MASTER PLAN ALTERNATIVES ANALYSIS 3-2
3.2 ALTERNATIVES INITIALLY CONSIDERED, BUT ELIMINATED 3-3
3.2.1 Demolition of Building Nos. 248 and 249 3-3
3.2.2 Demolition of Building Nos. 309 and 317 3-3
3.2.3 Demolition of Building No. 267 3-3
3.2.4 Perimeter Fence Improvements along Mesa Road 3-4
3.3 NO PROJECT ALTERNATIVE 3-5
3.4 ALTERNATIVE LOCATIONS 3-6
3.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE 3-6

Chapter Four
ENVIRONMENTAL CONDITIONS, IMPACTS, AND MITIGATION

4.1 AIR QUALITY/GREENHOUSE GAS EMISSIONS 4-2
4.1.1 Environmental and Regulatory Setting 4-2
4.1.2 Applicable Plans and Policies 4-5
4.1.3 Impact Evaluation Methodology and Significance Criteria 4-6
4.1.4 Project-Specific Impacts 4-8
4.1.5 Regional (Cumulative) Impacts 4-11
4.1.6 Comparative Impacts of Alternatives 4-13
4.1.7 Mitigation Measures 4-14
4.2 BIOLOGICAL RESOURCES 4-14
4.2.1 Environmental and Regulatory Setting 4-14
4.2.2 Applicable Plans and Policies 4-29
4.2.3 Impact Evaluation Methodology and Significance Criteria 4-36

4.2.4 Project-Specific Impacts 4-37
4.2.5 Regional (Cumulative) Impacts 4-42
4.2.6 Comparative Impacts of Alternatives 4-43
4.2.7 Mitigation Measures 4-44
4.3 CULTURAL RESOURCES 4-53
4.3.1 Environmental and Regulatory Setting 4-53
4.3.2 Applicable Plans and Policies 4-56
4.3.3 Impact Evaluation Methodology and Significance Criteria 4-57
4.3.4 Project-Specific Impacts 4-61
4.3.5 Regional (Cumulative) Impacts 4-67
4.3.6 Comparative Impacts of Alternatives 4-67
4.3.7 Mitigation Measures 4-68
4.4 GEOLOGY AND SOILS/HAZARDS AND HAZARDOUS MATERIALS 4-69
4.4.1 Environmental and Regulatory Setting 4-69
4.4.2 Applicable Plans and Policies 4-72
4.4.3 Impact Evaluation Methodology and Significance Criteria 4-72
4.4.4 Project-Specific Impacts 4-73
4.4.5 Regional (Cumulative) Impacts 4-75
4.4.6 Comparative Impacts of Alternatives 4-75
4.4.7 Mitigation Measures 4-76
4.5 HYDROLOGY AND WATER QUALITY 4-77
4.5.1 Environmental and Regulatory Setting 4-77
4.5.2 Applicable Plans and Policies 4-81
4.5.3 Impact Evaluation Methodology and Significance Criteria 4-84
4.5.4 Project-Specific Impacts 4-84
4.5.5 Regional (Cumulative) Impacts 4-87
4.5.6 Comparative Impacts of Alternatives 4-87
4.5.7 Mitigation Measures 4-88
4.6 LAND USE AND PLANNING 4-89
4.6.1 Environmental and Regulatory Setting 4-89
4.6.2 Applicable Plans and Policies 4-91
4.6.3 Impact Evaluation Methodology and Significance Criteria 4-99
4.6.4 Project-Specific Impacts 4-99
4.6.5 Regional (Cumulative) Impacts 4-111
4.6.6 Comparative Impacts of Alternatives 4-111
4.6.7 Mitigation Measures 4-112
4.7 PUBLIC UTILITIES (SOLID WASTE DISPOSAL) 4-113
4.7.1 Environmental and Regulatory Setting 4-113
4.7.2 Applicable Plans and Policies 4-115
4.7.3 Impact Evaluation Methodology and Significance Criteria 4-115
4.7.4 Project-Specific Impacts 4-115
4.7.5 Regional (Cumulative) Impacts 4-118
4.7.6 Comparative Impacts of Alternatives 4-118
4.7.7 Mitigation Measures 4-119

4.8 TRANSPORTATION/TRAFFIC 4-119
4.8.1 Environmental and Regulatory Setting 4-119
4.8.2 Applicable Plans and Policies 4-126
4.8.3 Impact Evaluation Methodology and Significance Criteria 4-129
4.8.4 Project-Specific Impacts 4-133
4.8.5 Regional (Cumulative) Impacts 4-134
4.8.6 Comparative Impacts of Alternatives 4-141
4.8.7 Mitigation Measures 4-141

Chapter Five
OTHER CEQA SECTIONS

5.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES 5-1
5.2 EFFECTS FOUND NOT TO BE SIGNIFICANT 5-2
5.3 UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL EFFECTS 5-3
5.4 GROWTH-INDUCING IMPACTS 5-4
5.5 CUMULATIVE IMPACTS 5-5

Chapter Six
SUMMARY OF ALTERNATIVES ANALYSIS

6.1 PROJECT OBJECTIVES 6-1
6.2 ALTERNATIVES CONSIDERED BUT REJECTED 6-2
6.3 COMPARISON OF ALTERNATIVES CONSIDERED 6-3
6.4 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE 6-6

Chapter Seven
MITIGATION, MONITORING, AND REPORTING

Chapter Eight
DOCUMENT PREPARERS AND REFERENCES

8.1 REPORT PREPARERS 8-1
8.2 LIST OF AGENCIES CONSULTED 8-3
8.3 REFERENCES 8-4
8.4 ACRONYMS AND ABBREVIATIONS 8-10

EXHIBITS

1A Airport Location and Vicinity Map ..... after page 1-2

2A Forecast Summary ..... after page 2-2
2B Recommended Development Concept Overview ..... after page 2-4
2C Recommended Airfield Development Concept ..... after page 2-4
2D Proposed Taxiway H Extension ..... after page 2-4
2E Recommended North Landside Development Concept ..... after page 2-4
2F Recommended Terminal Area Concept ..... after page 2-6
2G Capital Improvement Program (revised) ..... after page 2-6

3A Alternative Considerations ..... after page 3-2
3B Refined Alternatives Summary ..... after page 3-2
3C Airfield Facility Requirements ..... after page 3-6
3D Landside Facility Requirements ..... after page 3-6
3E Environmentally Superior Alternative ..... after page 3-6

4A California and Federal Ambient Air Quality Standards ..... after page 4-4
4B Special-Status Species Inventory ..... after page 4-22
4C Jurisdictional Wetlands Inventory ..... after page 4-28
4D ~~Potential Onsite Wetland~~Proposed Biological Mitigation Areas (revised) ..... after page 4-46
4E Proposed Project Actions Affecting Historic Structures ..... after page 4-62
4F Areas Handling Hazardous Materials ..... after page 4-70
4G 100-Year Floodplain and Floodways ..... after page 4-78
4H Airport Zoning ..... after page 4-90
4J Existing (2011) Noise Contours ..... after page 4-90
4K *Airport Industrial Area Specific Plan* Land Use Map ..... after page 4-92
4L Surrounding Street Network and Existing (2015) Traffic Volumes. after page 4-120
4M Existing Transit Network in Vicinity of Airport ..... after page 4-124

FINAL PROGRAM EIR APPENDICES

Appendix A - AGENCY AND PUBLIC COMMENTS AND RESPONSES ON THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Appendix B - AGENCY AND PUBLIC COMMENTS AND RESPONSES ON THE RECIRULATED DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Appendix C - TECHNICAL MEMORANDUM ON WHITE-TAILED KITE

Appendix D - TECHNICAL MEMORANDUM ON PROGRAMMATIC BIOLOGICAL MITIGATION PLAN

DRAFT PROGRAM EIR APPENDICES (on disc in back cover)

Appendix A - INITIAL STUDY

Appendix B - NOISE MODELING AND AIR QUALITY INPUT ASSUMPTIONS

Appendix C - SPECIAL-STATUS SPECIES INVENTORY

Appendix D - JURISDICTIONAL WETLANDS INVENTORY

Appendix E - HISTORICAL STRUCTURES REPORT

Appendix F - TRAFFIC IMPACT STUDY

RECIRCULATED DRAFT PROGRAM EIR APPENDICES (on disc in back cover)

Appendix A - LOCAL RUNWAY SAFETY ACTION PLAN

Appendix B - *SANTA BARBARA AIRPORT WILDLIFE HAZARD ASSESSMENT*

Appendix C - REVISED TRAFFIC IMPACT STUDY

PREFACE

The *Final Program Environmental Impact Report on the Proposed Airport Master Plan* (Final Program EIR) for the Santa Barbara Airport has been prepared in accordance with the *California Environmental Quality Act* (CEQA) (Public Resources Code [PRC] Sections 21000-21177), the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387), and the City of Santa Barbara (City) CEQA Guidelines. This Final Program EIR constitutes the complete environmental impact report (EIR) for the proposed Master Plan and includes the final versions of chapters from the Recirculated Draft Program EIR (2016) and those chapters of the Draft Program EIR (2015) that were not included in the Recirculated Draft Program EIR. This document includes the complete text with track changes to show the final revisions. Appendices to both of the Draft Program EIRs are included on compact disks affixed to the inside back cover of the hard copies of this Final Program EIR or are available for review electronically and are also part of the report.

Appended to this Final Program EIR are all agency and public comments received on the Draft and Recirculated Draft Program EIRs (**Appendix A** and **Appendix B**, respectively). Responses to all comments have been provided; however, duplicate comments were responded to only once. Text changes are included in this Final Program EIR based on specific comments received on the Recirculated Draft Program EIR. These final text changes are based primarily on input from several resource agencies, namely California Department of Fish and Wildlife (CDFW), Central Coast

Regional Water Quality Control Board (RWQCB), and the California Coastal Commission (CCC), regarding the analysis and programmatic mitigation for potential biological impacts of future development projects recommended by the draft Master Plan.

Santa Barbara Airport staff and consultants participated in telephone calls and an in-person meeting with representatives of the CDFW to discuss issues identified in their comment letters on the Recirculated Draft EIR. Following the development of a revised biological mitigation program, this program was presented to the Goleta Slough Management Committee on April 20, 2017.

It is important to note that this Final Program EIR is a programmatic document that considers only a planning level of review related to future implementation of the proposed Master Plan. No specific implementing development projects are proposed at this time. Future development projects at the Airport will be evaluated within the framework of this Program EIR and its Mitigation Monitoring and Reporting Program (MMRP) at the time that such projects are proposed for funding.

Revisions to Proposed Master Plan

The City's Airport Department has identified the following specific goals for the Master Plan:

- Relocation of general aviation facilities and new general aviation improvements.
- Airfield safety improvements.
- Consolidation of automobile parking associated with the Terminal.
- Terminal expansion.

Over the course of the environmental review for the project, specific aspects of the Master Plan's Recommended Concept Plan have been revised to respond to environmental concerns and agency feedback. In addition, based on Federal and State grant funding opportunities, the Master Plan Capital Improvement Program (CIP) has been revised. However, the overall goals of the proposed Master Plan have not been altered.

The final draft Recommended Concept Plan, CIP, and accompanying Master Plan text (Chapter Six) have been revised and correlate with the project description contained in this Final Program EIR. The Master Plan changes are available for review at: http://SBA.airportstudy.com or http://FlySBA.com. Key Master Plan features are discussed below, but are not all-inclusive. For a detailed project description, refer to Chapter Two of this Final Program EIR or the revised Master Plan, Chapter Six.

Northside General Aviation Redevelopment

General aviation facilities are planned to be consolidated on the north side of the airfield through a redevelopment of the existing general aviation area. This would provide distinct and separate functional areas for the primary aviation uses on the Airport. Existing historic hangars located on the north side of the Airport would be both retained and, where necessary, relocated out of the floodway, when funding is available.

Airfield Safety Improvements

Recommended airfield safety improvements include the extension of Taxiway H to the Runway 7 threshold and the construction of two new taxiway connectors to provide a full-length parallel taxiway on the north side of Runway 7-25. The existing glideslope antenna would be relocated to allow for the taxiway extension. The purpose of these improvements is to increase taxiway circulation safety and efficiency of the Airport. By providing a full-length parallel taxiway north of Runway 7-25, aircraft utilizing the north general aviation ramps would no longer have to cross the active primary runway to get to the Runway 7 threshold.

Other airport safety improvements include addressing taxiway geometry at safety "hot spots;" improving taxiway shoulders; removing an unnecessary displaced threshold on Runway 15L; acquiring avigation easements over areas of runway protection zones not located on actual airport property; and upgrading a section of the existing perimeter security fence along South Fairview Avenue. Taxiway B in the vicinity of the Terminal is proposed to be realigned to provide additional apron space at the Terminal and to provide a consistent separation from the Runway 15L-33R centerline.

Terminal Expansion and Related Vehicle Parking

Future Terminal expansion and related vehicle parking could be necessary if the Airport reaches certain levels of airport growth in terms of enplanements. The proposed Master Plan relies on FAA-approved forecasts (approval date: November 13, 2012) of aviation activity that fall within the City's General Plan assumptions and the previous *Aviation Facilities Plan* for the Airport. The Master Plan assumes that total operations at the Airport would increase at an average annual rate of 0.6 percent through the forecast period, while enplanements would increase by 2.8 percent annually. The growth in enplanements would occur primarily through increased load factors and average seat capacity on presently occurring flights. Air carrier operational growth is anticipated to be minimal. If these growth assumptions are not realized, the phasing of the recommended Terminal-related improvements would be adjusted to meet actual demand at the Airport.

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EXECUTIVE SUMMARY

ES1.0 INTRODUCTION

The purpose of this Program Environmental Impact Report (EIR) is to provide a programmatic assessment of the Santa Barbara Airport's (Airport's) Master Plan (Master Plan) under the *California Environmental Quality Act* (CEQA) (Public Resources Code, §§21000-21177), the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§15000-15387), and the City of Santa Barbara (City) CEQA Guidelines. The proposed Master Plan provides a programmatic framework that will guide site-specific future Airport actions, but does not authorize, fund, or carry out any project or activity (including ground-disturbing actions). As a result, the proposed Master Plan will not cause any direct impacts. There may be implications, or longer term indirect or cumulative environmental consequences, however, from managing the Airport under this programmatic framework. The City's adoption of the Master Plan would constitute a 'project' under CEQA. The City of Santa Barbara is the Lead Agency for the proposed plan under CEQA and is responsible for preparation and certification of the Airport Master Plan Program EIR.

Future development at the Airport under the proposed Master Plan will also be subject to the *National Environmental Policy Act (NEPA) of 1969*, CEQA, various Federal and State special purpose laws, and Federal Aviation Administration (FAA) oversight and approval. Before any ground-disturbing actions take place, they must be authorized in subsequent site-specific environmental analyses. In addition, compliance with existing local laws, regulations, and policies will be required of all future development proposals.

In ~~2010~~2011, the City certified a Final EIR ~~for *Plan Santa Barbara* ~~(SCH#2009011031)~~,~~ for the City's ~~proposed~~ General Plan update (General Plan) to guide growth through the year 2030. The Final General Plan EIR addressed several scenarios of growth for the City, and included moderate growth at the Airport in all scenarios. These Airport growth projections were based on the 2003 *Aviation Facilities Plan's* aviation demand forecast, which included scenarios for one to four percent annual growth rate of annual enplaned[1] passengers and two percent per year growth in general aviation (GA) aircraft operations. This current Program EIR on the Airport's Master Plan utilizes analysis in~~tiers off of~~ the City's 2010 Final General Plan EIR, where appropriate. The City's certified Final General Plan EIR is hereby incorporated by reference and is available for viewing at the City's Planning Division and at the following web address: www.SantaBarbaraCA.gov/gov/plan.asp.

The Master Plan relies on FAA-approved forecasts (approval date: November 13, 2012) of aviation activity that fall within the City's General Plan assumptions and the previous *Aviation Facilities Plan* for the Airport and provides development scenarios for the short term (2017), intermediate term (2022) and long term (2032). If these growth assumptions are not fully realized, the phasing of recommended improvements would be adjusted to meet actual demand at the Airport.

ES2.0 PROJECT DESCRIPTION

The City's Airport Department has identified the following specific goals for the Master Plan:

- Relocation of general aviation facilities and new general aviation improvements.
- Airfield safety improvements.
- Consolidation of automobile parking associated with the Terminal.
- Terminal expansion.

The draft Master Plan is available for review at: http://SBA.airportstudy.com or http://FlySBA.com.

Development projects at the Airport would be focused in one of three areas: airfield safety improvements; landside[2] redevelopment north of Runway 7-25; or improvements around the Terminal. No new development is proposed in the Airport Master Plan for the Airport Industrial Area specific planning area located north of Hollister Avenue.

[1] Enplaned refers to the total number of revenue passengers boarding aircraft, including originating, stop-over, and transfer passengers, in both scheduled and non-scheduled services.

[2] Landside development refers to the portion of an airport that provides the facilities necessary for the processing of passengers, cargo, freight, and ground transportation vehicles.

Recommended airfield safety improvements include the extension of Taxiway H to the Runway 7 threshold and the construction of two new taxiway connectors to provide a full-length parallel taxiway on the north side of Runway 7-25. The existing glideslope antenna[3] would be relocated to allow for the taxiway extension. The purpose of these improvements is to increase taxiway circulation safety and efficiency of the Airport. By providing a full-length parallel taxiway north of Runway 7-25, aircraft utilizing the north general aviation ramps would no longer have to cross the active primary runway to get to the Runway 7 threshold.

Other airport safety improvements include addressing taxiway geometry at safety "hot spots;" improving taxiway shoulders; removing an unnecessary displaced threshold[4] on Runway 15L; acquiring avigation easements over areas of runway protection zones not located on actual airport property; and upgrading a section of the existing perimeter security fence along South Fairview Avenue. Taxiway B in the vicinity of the Terminal is proposed to be realigned to provide ~~an acceptable~~ additional apron space at the Terminal and to provide a consistent separation from the Runway 15L-33R centerline.

The proposed north landside development is actually a redevelopment of the area. In order to provide for future expansion of the Terminal, general aviation facilities are planned to be consolidated on the north side of the airfield. This would provide distinct and separate functional areas for the primary aviation uses on the Airport. Existing historic hangars located on the north side of the Airport would be both retained and, where necessary, relocated out of the floodway.

Future Terminal expansion is planned as well as additional pavement for the Terminal and overflow apron to accommodate future activity levels at the Airport. The Master Plan expects that by the long-term enplanement milestone, two additional gates and three passenger loading bridges would be required to fully meet the Airport's needs. The expansion of the Terminal would require the relocation of general aviation facilities south of the Terminal to the north side of the airfield as previously mentioned. Additional Terminal parking would be provided by constructing/expanding two surface parking lots. The Terminal's loop road would be extended to access the new surface parking lots and the expanded Terminal facility.

ES3.0 REQUIRED DISCRETIONARY ACTIONS AND OTHER AGENCY APPROVALS

The ~~City of Santa Barbara will be required to formally adopt the~~ proposed Airport Master Plan requires formal adoption by the City of Santa Barbara City Council. Based on a preliminary Local Coastal Program (LCP) policy conformance analysis completed as part of this Program EIR, the City will also consider the initiation of an LCP amendment, a City of Santa Barbara General Plan amendment, and a rezone for the portion of a future Taxiway H Airfield Safety Project that would occur within the Goleta Slough Ecological Reserve (GSER).

[3] A glideslope antenna is an airfield navigational aid that provides vertical guidance for aircraft during approach and landing.

[4] A threshold is the beginning of that portion of a runway that is available for landing. If the threshold is "displaced," it is located at a point of the runway other than the designated beginning of the runway.

Future projects recommended in the Master Plan would require discretionary approvals at the time that they are ready for implementation. For example, the extension of Taxiway H Airfield Safety Project and the relocation of the glideslope antenna, which are related projects proposed to be located within the City's G-S-R/A-A-O (Goleta Slough Reserve/Airport Approach and Operations) zone, would require the approval of a Coastal Development Permit (CDP) as well as an LCP amendment/rezone and General Plan Amendment. An amendment to the Cooperative Agreement between the City of Santa Barbara and the California Department of Fish and Wildlife (CDFW) for management of the GSER would also be necessary. All actions would be subject to future review by the City under CEQA; this programmatic EIR will be used to help determine the appropriate subsequent CEQA review.

Other City approvals or resource agency permits may also be required. For example, actions affecting potential historic properties would require review by the Historic Landmarks Commission, while building and landscape plans would require review by the Architectural Board of Review. Actions within Special Flood Hazard Areas, including the floodways present at the Airport, could require a City flood development permit or variance per Chapter 22.24, Floodplain Management of the City *Municipal Code*. Changes in the amount or location of impervious surfaces at the Airport would need to be incorporated into the Airport's storm water pollution prevention plan (SWPPP) and associated Section 401 *Clean Water Act* permit and may require review and approval by the Regional Water Quality Control Board; the City's Storm Water Management Program (SWMP) would also need to be updated to incorporate the changes.

Projects within Goleta Slough, which is part of the California Coastal Commission's (CCC) Original Jurisdiction, would require CCC approval. If structures or fill is placed in wetlands or other jurisdictional waters of the United States (U.S.), a Section 404 permit under the *Clean Water Act* would also be necessary from the U.S. Army Corps of Engineers (USACE).

The City's Airport Layout Plan (ALP) was updated to reflect the proposed Master Plan, submitted to the FAA for review, and conditionally approved by FAA in May 2015. An ALP is a set of technical scaled drawings of the existing and planned land uses and facilities necessary for the operation and development of the airport and includes FAA-mandated safety areas. It is included in the proposed Master Plan as an appendix. A conditional approval from FAA means that future airport projects depicted on the ALP are subject to evaluation under NEPA prior to moving forward. ~~An updated Airport Layout Plan has been submitted to the FAA for review and was approved in May 2015.~~ NEPA review will be completed on a project-by-project basis as part of the Airport Improvement Program grant review process. FAA's statutory mission is to ensure the safe and efficient use of navigable airspace in the U.S. Thus, FAA must ensure that future airport projects do not derogate the safety of aircraft and airport operations at the Airport. Moreover, it is the policy of FAA under Title 49 United States Code (USC) §47101(a)(6) that airport development projects provide for the protection and enhancement of natural resources and the quality of the environment of the U.S.

ES4.0 PROJECT ALTERNATIVES

Initially, the project planners developed two airfield safety improvement alternatives, three terminal area improvement alternatives, and four north landside redevelopment alternatives (refer to Chapter Five of the Master Plan). After several iterations based on Planning Advisory Committee (PAC), Airport Commission Master Plan subcommittee, and Airport staff input, these initial alternatives were refined. The recommended development concept plan, as evaluated in this EIR, was chosen based on FAA design and safety guidance and criteria as well as environmental considerations and includes modified versions of the airfield and terminal area alternatives, and a revised north landside redevelopment alternative. The proposed project also includes the retention of historic structures that were originally recommended for demolition.

Alternatives retained for evaluation in this EIR include the No Project alternative and an Environmentally Superior alternative that would address biological concerns of the proposed Taxiway H extension. **Table ES-1** is a comparison of the environmental effects of these two alternatives when compared to the proposed project. Under the No Project and Environmentally Superior alternatives, some of the safety goals of the proposed Master Plan, such as the elimination of existing taxiway safety issues, would not be met.

TABLE ES-1
Summary of Alternatives Analysis Comparison
Santa Barbara Airport

Resource Category	Degree of Impact when Compared to Proposed Project	
	No Project Alternative (~~Degree of impact when compared to Proposed Project~~)	**Environmentally Superior Alternative** ~~(Degree of impact when compared to Proposed Project)~~
Air Quality/ Greenhouse Gas Emissions		
Impact AQ-1: Long-term (Operation) Impact	Same	Same
Impact AQ-2: Short-term (Demolition or Construction) Impact	Less	Less
Impact AQ-3: Cumulative Impact/*Clean Air Plan* Consistency	Same	Same
Impact AQ-4: Global Climate Change/Climate Plan Consistency	Same	Same
Biological Resources		
Impact BIO-1: Loss of jurisdictional wetlands, uplands, and indirect impact to Goleta Slough	Less	Less
Impact BIO-2: Impacts to protected birds	Less	Less
Impact BIO-3 Indirect impacts to adjacent creeks	Less	Less
Impact BIO-4: Cumulative impact to Goleta Slough	Less	Less
Cultural Resources		
Impact CR-1: Long-term relocation of Bldgs. 248 & 249 out of floodway	**Greater - Historic structures would remain in the floodway.**	Same
Impact CR-2: Impacts to Buildings 317, 309, and 267 (eligible for listing as City of Santa Barbara Structures of Merit)	Same	Same

TABLE ES-1 (continued)
Summary of Alternatives Analysis Comparison
Santa Barbara Airport

Resource Category	Degree of Impact when Compared to Proposed Project	
	No Project Alternative ~~(Degree of impact when compared to Proposed Project)~~	**Environmentally Superior Alternative** ~~(Degree of impact when compared to Proposed Project)~~
Cultural Resources (continued)		
Impact CR-3: Future projects could be located within a moderate sensitivity zone for cultural resources	Less	Same
Geology and Soils/Hazards and Hazardous Materials		
Impact G/HAZ-1: Risks due to seismic activity	Less	Same
Impact G/HAZ-2: Risks due to soil conditions	Less	Same
Impact G/HAZ-3: Risk due to routine handling and transport or accidents involving hazardous materials	Less	Same
Impact G/HAZ-4: Risks involving exposure to soil or groundwater contamination.	Less	Same
Hydrology and Water Quality		
Impact HYD-1: Potential drainage and water quality impact	Less	Less
Impact HYD-2: Potential flooding hazards	**Greater - Existing structures would remain in the floodway**.	Less
Impact HYD-3: Substantial unmitigated risk of tsunami inundation	Same	Same
Land Use and Planning		
Impact LU-1: Impact to established communities	Same	Same
Impact LU-2: Compatibility with applicable General Plan policies and other City plans	Less	Less
Impact LU-3: Compatibility with SP-6 Plan and SP-6 overlay zone	Same	Same
Impact LU-4: Compatibility with Airport's LCP	Less	Less
Impact LU-5: Consistency with the City of Goleta's General Plan/Zoning (avigation easements)	Same	Same
Impact LU-6: Consistency with the City's General Plan, G-S-R zone, GSER (Taxiway H Airfield Safety Project)	Less	Less
Public Utilities (Solid Waste Disposal)		
Impact SW-1: Long-term (operational) impact	Unknown	Same
Impact SW-2: Short-term (Demolition and/or Construction) Impact	Less	Less
Impact SW-3: Cumulative impact	Unknown	Same
Transportation/Traffic		
Impact T-1: Project-specific impacts to traffic and circulation in the short term	Same	Same
Impact T-2: Project contributions to cumulative impacts~~Cumulative project impacts~~ to traffic and circulation in the intermediate term (Kellogg Ave/Hollister Ave)	Less	Same

TABLE ES-1 (continued)
Summary of Alternatives Analysis Comparison
Santa Barbara Airport

Resource Category	Degree of Impact when Compared to Proposed Project	
	No Project Alternative (~~Degree of impact when compared to Proposed Project~~)	**Environmentally Superior Alternative** ~~(Degree of impact when compared to Proposed Project)~~
Transportation/Traffic (continued)		
Impact T-3: Project contributions to cumulative impacts~~Cumulative project impacts~~ to traffic and circulation in the long term (Kellogg Ave/Hollister Ave; South Fairview Ave/US 101 NB ramps)	Less[1]	Same[1]

[1] ~~Significant traffic impacts would still occur as some~~Some intersections within the study area are forecast to operate below an acceptable level of service with or without trips generated by the project.

Alternative locations for the Airport would require a comprehensive study that is beyond the scope of this EIR. Section 15126.6 (f)(3) of the CEQA Guidelines states, "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." Therefore, alternative locations have not been evaluated further in this EIR.

ES5.0 SUMMARY OF IMPACTS AND MITIGATION

The environmental impacts of the proposed project were first analyzed in an Initial Study, which was included in the Draft EIR as Appendix A. The Initial Study concluded that many impact categories would not be significantly impacted by the proposed project or had already been comprehensively discussed and mitigated through the City's Final General Plan EIR. However, potentially significant impacts could occur as a result of the proposed project in the following areas:

- Air Quality/Greenhouse Gas Emissions (Construction only)
- Biological Resources
- Cultural Resources
- Geology and Soils/Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Public Utilities (Solid Waste Disposal) (Cumulative)
- Transportation/Traffic (Cumulative)

These impacts have been addressed in this EIR and have been categorized according to the City's system of classifying impact significance levels:

- Class I, Significant Environmental Impact: A significant impact to the environment that remains significant even after mitigation measures are applied;

- Class II, Less than Significant Impact with Mitigation: A potentially significant impact that can be avoided or reduced to an insignificant level with mitigation;

- Class III, Less than Significant Impact; and

- Class IV, Beneficial Impact.

Tables ES-2 and **ES-3** list the proposed project's impact analysis according to the above impact classification system. Chapter Seven of this EIR contains a mitigation monitoring and reporting plan for all recommended mitigations that are within the jurisdiction of the City of Santa Barbara to implement. CEQA Guidelines Section 15126.2(b) requires that significant environmental effects that cannot be avoided be specifically identified. These "Class I" impacts are those that cannot be feasibly mitigated below a level of significance with the project as proposed and are thus "unavoidable" unless the project is redesigned to ameliorate the impact or other mitigations beyond the jurisdiction of the City of Santa Barbara applied.

The Master Plan's intermediate- and long-term (years 2022 and 2032) cumulative traffic impacts fall into this category because local and regional traffic improvements discussed in Section 4.8.7 of this EIR are not within the control of the City of Santa Barbara to carry out. Due to the proposed relocation of certain general aviation uses to the north side of the Airport, an estimated 12 project-related trips are expected to go through the South Fairview Avenue/US 101 northbound (NB) ramp in the PM peak-hour; 14 - 15 project-related PM peak-hour trips are expected to go through the Kellogg Avenue/Hollister Avenue intersection. These intersections are forecast to operate at a V/C ratio of 0.77 or greater; the City of Santa Barbara considers any trips through an intersection operating at a volume to capacity (V/C) ratio of 0.77 or greater to ~~be~~ contribute to a cumulative impact. In addition, in the long term, 15 trips through the Kellogg Avenue/Hollister Avenue intersection also meets the City of Goleta's cumulative significance threshold of 15 additional trips at intersections experiencing levels of service (LOS) D.

The additional trips cannot be avoided unless the proposed relocation of general aviation use does not occur. However, the consolidation of all general aviation uses to the north side of the Airport is one of the primary aspects of the proposed plan and has significant future safety and efficiency ramifications for the Airport. While local and regional traffic improvements, including the construction of a new US 101 overcrossing at La Patera Road, would improve the LOS at these intersections to LOS A or B, these mitigation measures cannot be implemented by the Airport or the City of Santa Barbara. The Airport will contribute its fair-share allocation to the cost of such improvements (based on the City of Goleta traffic impact mitigation fees), if and when such improvements go forward.

TABLE ES-2
Impact (Class I and II) and Mitigation Summary for Proposed Project
Santa Barbara Airport

CLASS I: SIGNIFICANT ENVIRONMENTAL IMPACTS (after mitigation)	
Impact	**Mitigation Measures**
Impact T-2: Project contributions to cumulative impacts~~Cumulative project impacts~~ to traffic and circulation in the intermediate term (Kellogg Ave/Hollister Ave)	T/mm-1: All development at the Airport will contribute an equitable share cost allocation for afternoon peak-hour trips added to the Hollister Avenue/Kellogg Avenue intersection and to the Fairview Avenue/US 101 NB ramps. Equitable share shall be calculated using the most recent cost for the improvement programmed for these intersections in the Goleta Transportation Improvement Plan (GTIP), and shall be based upon a traffic study prepared pursuant to the City of Santa Barbara Traffic management Strategy for the Airport Area, including consultation and coordination with the City of Goleta.~~The Airport will contribute its "fair share" cost allocation of traffic mitigation fees for the future construction of planned Goleta General Plan traffic improvement projects or a multi-modal transit center, based on adopted mitigation fee programs, at the time that such improvement projects go forward.~~ T/mm-2: The City will pursue the implementation of transportation demand management (TDM) measures within new north side lease agreements, consistent with City policy, as north side redevelopment opportunities become available.
Impact T-3: Project contributions to cumulative impacts~~Cumulative project impacts~~ to traffic and circulation in the long term (Kellogg Ave/Hollister Ave; South Fairview Ave/US 101 NB ramps)	See T/mm-1 and T/mm-2 above.
CLASS II: LESS THAN SIGNIFICANT IMPACTS WITH MITIGATION	
Impact	**Mitigation Measures**
Impact AQ-2: Construction and/or building removal occurring under the proposed Master Plan could exceed 25 tons of any criteria pollutant (except CO) within a 12-month period. (Short-term impact)	AQ/mm-1: As a condition of approval, all construction and/or building removal projects occurring under the proposed Master Plan shall be required to estimate said project's combined emissions from all construction equipment to ensure that the project would not exceed 25 tons of any criteria pollutant except carbon monoxide (CO) within a 12-month period. Standard equipment exhaust mitigation measures recommended by the County Air Pollution Control District (APCD) for such projects shall be implemented, as appropriate.
Impact BIO-1: The proposed Taxiway H Airfield Safety Project could include a loss of jurisdictional wetlands, uplands, and indirect construction impacts to Goleta Slough and sensitive flora and/or fauna. (Project-specific impact)	BIO/mm-1: Programmatic Mitigation Plan. This Programmatic Mitigation Plan is intended to provide a framework for future project-specific Habitat Mitigation and Monitoring Plan(s) (HMMPs) to provide compensatory mitigation for indirect and direct impacts to jurisdictional wetland habitat and established wetland and riparian setback/buffers from these protected habitats under this Program EIR. The HMMPs shall also address impacts to upland (i.e., grassland and shrubland) habitats, when appropriate. For example, under direction of this Programmatic Mitigation Plan, the Taxiway H Airfield Safety Project will be required to submit for regulatory agency (USACE, CDFW, CCC, and City, as appropriate) approval a project-specific HMMP for impacts to jurisdictional wetland and upland areas. Future project-specific HMMPs must include the following requirements and information, as appropriate:

	1. Mitigation for wetland habitat and and/or wetland and/or riparian buffers shall be a minimum of 4:1 (restoration to impact) ratio and upland habitat (i.e., grassland and shrubland) shall be replaced at a 3:1 ratio in a form and location acceptable to the permitting regulatory agencies. Regulatory agencies may require a higher ratio depending on the habitat value and function that is proposed to be impacted. 2. Habitat mitigation should occur on Airport property (onsite) in lands historically part of the Goleta Slough wetland complex and on wetland and upland areas currently mapped as disturbed or dominated by areas of non-native invasive plant species which would be reasonably expected to establish sustainable wetland, transitional, and upland habitat(s) to the extent feasible. 3. Any mitigation within the GSER shall be authorized by the CDFW and CCC under a LCP amendment. 4. The Airport shall solicit comments from the GSMC, a technical advisory committee for the GSER. 5. Focused biological surveys shall be conducted on potential mitigation area(s) within one year of approval of any future project-specific HMMPs. Depending on the amount of impacts to wetland and upland habitats, more than one mitigation area may require a biological survey. At minimum, the biological survey(s) shall consist of vegetation community mapping, floristic inventory, a wetland delineation and jurisdictional determination, and focused Belding's savannah sparrow surveys and raptor surveys, if suitable habitat exists for these species on the selected mitigation area(s). Additionally, each mitigation area shall be analyzed for physical habitat conditions including hydrology, salinity, and soil(s) by the appropriate technical specialists. 6. All sensitive biological resources shall be avoided in the design and during implementation and maintenance of future mitigation. Sensitive biological resources include, but are not limited to, occurrences of nesting Belding's savannah sparrow, southern tarplant, coulter's goldfield, meadow barley, creeping ryegrass, and other native grassland and native wetland habitat (Dudek 2012; Dudek 2012). 7. The Airport should comply with the conditions and recommendations of existing guiding documents to the extent feasible: LCP amendments, Slough Management Plan (GSMC 2015), and the Airport's current WHMP (City of Santa Barbara 2017). 8. The Airport shall assess the potential for an increase in wildlife hazards to airfield operations as described in the WHA (Dudek 2016) and the current WHMP (City of Santa Barbara 2017) with respect to the following criteria: a. Increasing the attractiveness of the Airport to hazard species or roups identified in the WHA/WHMP, as well as other species that may provide a hazard to aircraft. These include, but are not limited to, raptors, turkey vultures, gulls, waterfowl, pigeons and doves, flocks of blackbirds and European starlings, and coyotes.

	b. Increasing the attractiveness of the Airport to any species covered under a valid Airport depredation permit. c. Providing attractants to wildlife within 250 feet of a runway centerline. d. Attracting threatened or endangered species, California fully protected species, or any species for which the Airport's ability to conduct wildlife hazard management activities (such as visual and acoustic hazing) may be limited. e. Increasing rodent populations on the Airport. f. Inundation of the airfield. g. Increasing trees or shrubs in the airfield vicinity. 9. Restoration strategies shall be proposed that balance the criteria identified in BIO-1.1 through BIO-1.8 as well as agency requirements for wetland and upland restoration. Mitigation Areas 1 through 7 (as identified in Exhibit 4D) and potential restoration strategies have been considered in preparation of the Programmatic Mitigation Plan and shall continually be considered in project-specific HMMP(s). A summary of the mitigation areas, acreage available for mitigation, existing habitats, and potential restored and/or enhanced habitats are presented in **Table 4G**. Characteristics and restoration potential for each mitigation area are provided in **Appendix D** of this Program EIR. 10. As necessary due to sea level rise or other changes in future conditions within the Slough, adaptive restoration measures consistent with the recommendations of the Slough Management Plan shall be implemented. 11. The genetic origin of all native wetland and riparian propagules shall be from the Goleta Slough and for all native upland plants should be from the Goleta Valley. All wetland plants shall have a facultative, facultative wetland, or obligate wetland indictor status per the U.S. Army Corps of Engineers National List of Plant Species that Occur in Wetlands. 12. Restoration shall be phased to ensure that all restoration plantings are in place with sufficient irrigation prior to final inspection. Irrigation shall be reduced or eliminated after Year 2 depending on environmental conditions (i.e., drought may prolong irrigation). The wetland restoration shall be without supplemental irrigation for at least two years prior to final approvals. This could result in a maintenance and monitoring period greater than five years. 13. Prior to commencement of development activities, the Airport shall file a performance bond with the City to complete restoration and maintain plantings for a five-year period. 14. The extent of development shall be restricted to those areas displayed on site grading plans to avoid additional impacts to wetland habitat and

	wetland and/or riparian buffers. Development boundaries shall be delineated (i.e., using wooden stake with highly visible environmentally-friendly paint) in the field prior to any ground-breaking activities. 15. Performance Criteria. Mitigation success for future project-specific HMMP(s) shall be determined, at minimum, by the following performance criteria: • All installed plants must achieve a 70 percent survival rate by the end of the first year, and an 80 percent survival rate of the remaining plants by the end of the fifth year. • Non-native invasive weeds must remain below 15 percent of the total vegetative cover at all times. Naturalized, non-invasive, non-native grasses are not included in this performance criterion. • Native cover must be 75 percent after three years and 90 percent cover after five years. • All container plants and seeded areas must survive without supplemental irrigation for a minimum of two years. • No single species shall constitute more than 50 percent of the vegetative cover. • No woody invasive species shall be present and herbaceous invasive species, excluding naturalized, non-invasive grasses, shall not exceed five percent cover after five years. • Replacement plants shall be monitored for a minimum of three years to ensure successful establishment. ~~Programmatic Wetland Restoration Plan (PWRP). The PWRP is intended to provide a framework for future project-specific Habitat Mitigation and Monitoring Plans (HMMPs) to provide compensatory mitigation for indirect and direct impacts to jurisdictional wetland habitat and established wetland and riparian setback/buffers. The PWRP shall be consistent with all Airport operation and management policies, the Wildlife Hazard Management Plan, the *California Coastal Act* and Airport LCP, the *Goleta Slough Area Sea Level Rise and Management Plan* (Slough Management Plan), the *California Fish and Game Code* (CFGC), the *Clean Water Act* (CWA), and other plans and polices that regulate wetland habitat. Under direction of the PWRP, the Taxiway H Airfield Safety Project will be required to submit for regulatory agency (USACE, California Department of Fish and Wildlife [CDFW], California Coastal Commission [CCC], and City, as appropriate) approval of a HMMP for impacts to jurisdictional areas.~~ ~~Components of the PWRP shall include, at minimum, the following requirements and information:~~ ~~1. Mitigation for wetland habitat and and/or wetland and/or riparian buffers shall be a minimum of 2:1 (restoration to impact) ratio. Agencies may require a higher ratio depending on the habitat value and function that is proposed to be impacted. Upland habitat shall be replaced at a 1:1 ratio~~

	~~in a form and location acceptable to the Goleta Slough Management Committee.~~ ~~2. Wetland mitigation should occur on Santa Barbara Airport property (on-site) in lands historically part of the Goleta Slough wetland complex and on lands currently mapped as disturbed or dominated by non-native species which would be reasonably expected to establish sustainable wetland habitat.~~ ~~3. The Airport shall comply with the conditions and recommendation of existing guiding documents as well as those under development (i.e., Wildlife Hazard Assessment for the Airport, LCP amendments, and the Slough Management Plan).~~
	~~4. Restoration strategies shall be proposed that balance the criteria identified in Nos. 2 and 3 above, as well as agency requirements for wetland restoration. Mitigation Areas 1 through 4 (see below) and potential restoration strategies shall be considered in preparation of any project-specific HMMPs.~~ ~~**Table 4G** and **Exhibit 4D** identify four potential mitigation areas where areas within or adjacent to the Slough could be restored to create replacement wetlands. Areas 1 and 2 are located southwest of Tecolotito Creek within the existing G-S-R zone; Areas 3 and 4 are located southwest of the intersection of the Airport's existing runway system within the existing A-F (Airfield Facilities) zone. As part of the mitigation effort, if selected, Mitigation Areas 3 and/or 4 would first be rezoned to G-S-R. Combined, the mitigation areas would provide an opportunity for almost 30 acres of new wetland.~~ ~~The mitigation area(s) shall be selected in consultation with USACE, Regional Water Quality Control Board (RWQCB), and CDFW, as appropriate. The areas would first be re-contoured, and then planted with a variety of short wetland vegetation. The desired plant composition shall be consistent with the Slough Management Plan and compliant with Airport safety regulations (for example saltgrass or meadow barley as key components).~~ ~~5. As necessary due to sea level rise or other changes in future conditions within the Slough, adaptive restoration measures consistent with the recommendations of the Slough Management Plan shall be implemented.~~ ~~6. The genetic origin of all native wetland and riparian propagules shall be from the Goleta Slough. Wetland plants shall be, at a minimum, facultative (FAC) species (i.e., equally likely to occur in wetlands [estimated probability 34 – 66 percent] or non-wetlands) per the USACE definition.~~ ~~7. Restoration shall be phased to ensure that all restoration plantings are in place with sufficient irrigation prior to final inspection. Irrigation shall be reduced or eliminated after Year 2 depending on environmental conditions (i.e., drought may prolong irrigation). The wetland restoration shall be without supplemental irrigation for at least two years~~

	~~prior to final approvals. This could result in a maintenance and monitoring period greater than five (5) years.~~
	~~8. Prior to commencement of development activities, the Airport shall file a performance bond with the City to complete restoration and maintain plantings for a five (5) year period.~~ ~~9. The extent of development shall be restricted to those areas displayed on site grading plans to avoid additional impacts to wetland habitat and wetland and/or riparian buffers. Development boundaries shall be delineated (i.e., using wooden stake with highly visible environmentally-friendly paint) in the field prior to any ground-breaking activities.~~ ~~10. PWRP Timing and Approvals. The Airport shall submit the PWRP to the CCC for review and approval. The PWRP shall also be submitted to the USACE, CDFW, and RWQCB for their review; however, approvals are not required from these agencies. Future project-specific HMMPs will be reviewed and required as part of regulatory permitting (404/401, streambed alteration, etc.). For example, any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (and associated riparian resources, including salt marsh wetlands) of a river or stream may require a Lake and Streambed Alteration (LSA) agreement with the CDFW pursuant to Section 1602 of the CGFC.~~ BIO/mm-2: During construction of the Taxiway H project, ~~all~~ applicable policies of the LCP shall be ~~required~~implemented, including but not limited to the following: • A buffer strip of a minimum of 100 feet in width shall be maintained in a natural condition along the periphery of all wetland communities. Where development of an airfield safety project renders maintenance of the buffer infeasible, the City shall provide the maximum amount of buffer area feasible and all impacts to wetland habitat shall be mitigated to the maximum extent feasible such that no net loss of wetland habitat occurs (Policy C-4). • Wetland areas temporarily affected by construction activities shall be restored to pre-construction conditions (Policy C-11). • The project shall incorporate water quality best management practices (BMPs) or a combination of BMPs (per City guidance) that are best suited to reduce pollutant loading to the maximum extent feasible (Policy C-12). • Special-status plant and wildlife protection measures shall be implemented (Policy C-15) (refer to BIO/mm-1). • All construction, habitat mitigation and restoration plans, and special-status plant and wildlife mitigation and protection measures, shall be reviewed and approved by the regulatory agency/agencies having jurisdiction over the identified resource (Policy C-16).
Impact BIO-2: Potentially significant impacts to the Belding's savannah sparrow (i.e., potential take)	BIO/mm-3: No construction shall occur during the avian breeding season (February 1-September 1) unless a survey from qualified biologist with experience in conducting breeding bird surveys finds that no bird breeding

could ~~would~~ occur as a result of the Taxiway H Airfield Safety Project if this protected species is present during construction. In addition, indirect noise impacts during construction might occur to nesting birds along Carneros Creek. (Project-specific impact)	habitat exists within 300 feet of the disturbance area (500 feet for raptors) or can state with certainty that such habitat does not contain nesting birds. Project personnel, including contractors working on the site, shall be instructed on the sensitivity of the area. Reductions in nest buffer distance may be approved by the City's Community Development Department depending on the avian species involved, ambient levels of human activity, screening vegetation, or other factors. BIO/mm-4: Taxiway H Airfield Safety Project and its habitat restoration project sites shall be monitored by a qualified biologist for Belding's savannah sparrow. Prior to site preparation and construction activities, the Airport shall have a qualified biologist survey all breeding/nesting habitat within the project site every seven days for eight consecutive weeks. Documentation of findings, including negative findings, shall be submitted to the CDFW. Site preparation and construction activities will only begin if no breeding/nesting birds are observed and concurrence has been received from CDFW. If breeding activities or an active nest is located in a work area, site preparation and construction activities shall not begin in that area until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and the young will no longer be impacted by the project. Once site preparation and construction activities have commenced, the project site shall be monitored for Belding's savannah sparrow on a weekly basis. Documentation of findings, including negative findings, shall be submitted to CDFW until construction is complete. Site preparation or construction activities shall be suspended immediately in a given area if the qualified biologist determines that breeding or nesting activity is occurring in that area. Site preparation and construction activities shall not resume until the monitor determines that the breeding and nesting activities described above have stopped. Noise levels will be monitored by a qualified biologist to determine if construction activities are disruptive to Belding's savannah sparrow in or adjacent to the project site. If a significant disruption to foraging behavior is observed, construction activities in the area of disturbance will be stopped immediately until the qualified biologist develops recommendations to reduce or eliminate the disturbances ~~and~~ , receives concurrence from CDFW, and required measures are implemented
Impact BIO-4: The proposed Taxiway H Airfield Safety Project could include a loss of jurisdictional wetlands, uplands, and indirect construction impacts to Goleta Slough and sensitive flora and/or fauna. (Cumulative impact)	See BIO/mm-1 and 2 above.
Impact CR-1: The Master Plan proposes to pursue a management plan for the General Western Aero hangars that would mothball and stabilize the buildings in their existing location until such time as they	CR/mm-1: The following mitigation program shall be implemented to reduce potential impacts to the General Western hangars (Buildings 248 and 249): 1. Mothball and stabilize following National Park Service (NPS) Preservation Brief 31;

can be relocated out of the floodway. (Project-specific impact)	2. Prepare management plan, which includes: - Nominate for National Register of Historic Properties (NRHP); - Seek approval to move hangars out of floodway to a location on the Airport that would preserve the integrity of the historic property; - Consult with interested parties to propose future uses and explore research/grant funding options; - Based on proposed uses, determine treatment plan to restore, preserve, or rehabilitate per Secretary of Interior standards. 3. Show relocation areas on "Development Concept Map" of proposed Master Plan.
Impact CR-3: Proposed Master Plan projects located within a moderate sensitivity zone of the MARA could have project-specific or cumulative impacts on cultural resources protected by Federal, State or City laws and guidelines. (Project-specific impact)	CR/mm-2: All future projects under consideration within the Master Plan shall be evaluated based on the screening process set forth in the City's Master Archaeological Resources Assessment (MARA). If a proposed project is located within a mapped moderate sensitivity zone, a determination shall be made by the City's Environmental Analyst regarding whether or not all proposed earth disturbance would be confined to areas of previous disturbance. The proposed project shall then follow the appropriate mitigation and reporting requirements provided in the MARA and in reports approved by the City's Environmental Analyst or Historic Landmarks Commission. Native American consultation shall occur as each individual project is proposed and shall include, but not be limited to, ~~the~~ a current list of contacts provided by the Native American Heritage Commission. ~~in response to the environmental scoping process for this EIR.~~ CR/mm-3: The City's Standard Condition of Approval regarding "Unanticipated Archaeological Resources Contractor Notification" shall be implemented ~~as necessary~~for all projects.
Impact G/HAZ-1: Future Master Plan development could be adversely affected by seismic activity. (Project-specific impact)	G/HAZ/mm-1: The design and construction of load-bearing structures shall be subject to the recommendations of a site- and project-specific geotechnical investigation and/or engineering report. This mitigation is not necessary for minor development projects such as the installation of replacement fencing or aboveground storage tanks, unless required by the building permit.
Impact G/HAZ-2: Future Master Plan development could be adversely affected by adverse soil conditions. (Project-specific impact)	See G/HAZ/mm-1 above.
Impact G/HAZ-4: There is the potential for the exposure of project occupants or construction workers to hazardous materials at the Airport. (Project-specific impact)	G/HAZ/mm-2: A Construction Contingency Plan shall be developed that addresses methods to control potential migration of any contamination discovered during construction as well as safety practices for on-site construction personnel and the general public. Details of the plan shall include, but not be limited to: • Soils monitoring for identification of contaminated soil during and after construction for all eroded and/or graded soils; • Measures to be taken to protect workers and the public (such as fencing or hazard flagging, covering contaminated soil with plastic, etc.) and to prevent migration of contaminants to the surrounding environment;

	• Notification procedures including, but not limited to, Santa Barbara County Environmental Health Services. These Contingency Plans may be incorporated into the Construction Phase Erosion Control and Polluted Runoff Control Plans required per LCP Policy C-14 for projects requiring a CDP (see Section 4.5.2), if appropriate. G/HAZ/mm-3: If contamination is discovered, a project-specific remediation plan shall be prepared and implemented per applicable regulations that reduces all contaminant concentrations to acceptable levels prior to issuance of grading or building permits or, if already under construction, prior to resuming work.
Impact LU-4: Recommended projects within the proposed Master Plan, such as the proposed Taxiway H Airfield Safety Project, could result in inconsistencies with LCP policies related to Goleta Slough. (Project-specific impact)	LU/mm-1: A detailed project-specific impact analysis and mitigation program for the Taxiway H Airfield Safety Project, and associated analysis of the project's consistency with the G-S-R zone and the policies of the Airport's LCP and *California Coastal Act*, shall be conducted during the CDP and LCP amendment review process. The analysis shall specifically address project alternatives, mitigation, and/or additional LCP policy requirements necessary to ensure that any permitted impacts to wetland and sensitive habitat and associated buffers will be adequately minimized and mitigated to ensure long-term protection of Goleta Slough habitats and open space. LU/mm-2: A consistency review of the Taxiway H Airfield Safety Project with the Slough Management Plan shall be conducted during the project-specific CDP and/or LCP amendment review process, as applicable. Project-specific mitigation measures shall be identified and incorporated into the City's CDP, and/or LCP policies shall be identified and incorporated into Airport LCP, where determined necessary and feasible, to ensure project consistency with the Slough Management Plan. Required mitigation shall also be evaluated for consistency with the Slough Management Plan restoration goals.
Impact LU-4 (continued)	LU/mm-3: The City of Santa Barbara ~~and the CDFW~~ shall undertake a process in coordination with the CDFW toward amending~~amend~~ the Cooperative Agreement dated August 25, 1987 (as revised) for the maintenance and management of the Goleta Slough to accommodate the Taxiway H Airfield Safety Project and establish its consistency with the Cooperative Agreement. Amendments to be considered shall include an ~~to~~ adjustment of~~to adjust~~ the boundaries of the GSER to exclude the Taxiway H Airfield Safety Project site, and ~~to include~~inclusion of a site of similar habitat value at an area ratio of 1:1 (i.e., if Taxiway H and associated actions removes 11 acres from the GSER, 11 acres would be added to the GSER from available Airport property adjacent to the Slough). ~~This~~ Such a mutually-accepted exchange shall be in addition to required biological mitigation. The Cooperative Agreement amendment shall be presented to the California Fish and Game Commission for concurrence.
Impact LU-6: Recommended projects within the proposed Master Plan, such as the proposed Taxiway H Airfield Safety Project, could result in inconsistencies with LCP policies related to the City's General Plan designation and G-S-R zone for	See LU/mm-1, 2, and 3 above.

the GSER. Amendments to planning documents and agreements would be necessary to establish policy consistency. (Project-specific impact)	
Impact SW-2: Some proposed building demolition or construction under the proposed Master Plan could result in significant impacts to regional solid waste disposal. (Short-term impact)	SW/mm-1: As a condition of approval, projects recommended by the proposed Master Plan must feasibly reduce, reuse, and recycle demolition and construction waste consistent with State and City diversion goals in place at the time.

TABLE ES-3
Impact (Class III and IV) Summary for Proposed Project
Santa Barbara Airport

CLASS III: LESS THAN SIGNIFICANT IMPACTS (no additional mitigation necessary)
Impact AQ-1: Long-term (Operation) impact on air quality
Impact AQ-3: Cumulative Impact/*Clean Air Plan* consistency
Impact AQ-4: Global Climate Change/Climate Plan consistency
Impact BIO-3: Indirect impacts to adjacent creeks
Impact BIO-4: Cumulative impact to white-tail kite foraging habitat
Impact CR-2: Impacts to Buildings 317, 309, and 267 (eligible for listing as City Structures of Merit)
Impact G/HAZ-2: Risks due to erosion
Impact G/HAZ-3: Risk due to routine handling and transport or accidents involving hazardous materials
Impact HYD-1: Potential drainage and water quality impact
Impact HYD-2a: Potential flooding hazards due to new facilities within a regulatory floodway
Impact HYD-3: Substantial unmitigated risk of tsunami inundation
Impact LU-1: Impact to established communities
Impact LU-2: Compatibility with applicable General Plan policies and other City plans
Impact LU-3: Compatibility with SP-6 Plan and SP-6 overlay zone
Impact LU-5: Consistency with the City of Goleta's General Plan/Zoning (avigation easements)
Impact SW-1: Long-term (operational) impact to solid waste disposal
Impact SW-3: Cumulative impact to solid waste disposal
Impact T-1: Short-term (2017) impacts to traffic and circulation
CLASS IV: BENEFICIAL IMPACTS
Impact HYD-2b: Potential flooding hazards due to the removal of buildings out of a regulatory floodplain.

The proposed Master Plan recommends that certain development or redevelopment projects be carried forth at the Airport over the next 20 years to increase the Airport's safety and efficiency. Construction of new buildings and paved surfaces would entail the commitment of energy and non-renewable natural resources, such as fossil fuels, sand and gravel, asphalt, metals and other minerals, and water, which could then no longer be utilized for other purposes. This commitment and consumption of building materials and energy is associated with any development in the region and would not be unique to the proposed project. Future projects would also result in the ongoing irreversible commitment of energy, water, and land. For example, additional vehicle travel would utilize energy sources, while solid waste generation would utilize limited landfill capacity. The adoption of the Master Plan itself does not approve any projects or allow any

ground-disturbing activity. Therefore, adoption of the Master Plan would not cause unavoidable adverse impacts or an irreversible or irretrievable commitment of resources.

Since the proposed Master Plan recommends redevelopment of the Airport for safety and efficiency reasons, rather than capacity-increasing projects that would stimulate additional airport operations, the project would not foster economic or population growth and is not considered growth-inducing. The previous Airport growth projections in the 2003 *Aviation Facilities Plan* were similar or slightly more than is presently assumed in the proposed Master Plan.

ES6.0 PUBLIC AND AGENCY REVIEW OF THE DRAFT AND RECIRCULATED DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORTS

During the 45-day public review period on the Draft Program EIR, from August 31, 2015 through October 16, 2015, the City of Santa Barbara received two written comment letters. Requests were then made by several additional agencies or organizations for a two-week extension of the public review period, which was granted. A total of 11 written comment letters were received by October 30, 2015. In addition, four oral comments were received – one at an Airport Commission meeting, held on September 16, 2015, and three at a City Planning Commission hearing, held on October 1, 2015. See **Appendix A** for copies of these comments and responses.

The Recirculated Draft Program EIR was made available for public and agency comment from July 15, 2016, to September 13, 2016. Public comment on the Recirculated Draft Program EIR was also received at an Airport Commission meeting on July 20, 2016, and a City Planning Commission hearing on September 1, 2016. A total of 16 written comment letters or emails and three oral comments were received. Two of the oral comments received were followed up with submittal of the comments in writing. See **Appendix B** for copies of these comments and responses.

~~Text and exhibit edits have been made in this Recirculated Draft EIR in response to the comments received on the Draft EIR. These text (and exhibit) edits have been primarily to:~~

- ~~provide clarification (text and exhibits);~~
- ~~update information that has become available since the publication of the Draft EIR;~~
- ~~provide additional analysis and mitigation for impacts to Biological Resources;~~
- ~~address recent court cases regarding the treatment of sea level rise under CEQA;~~
- ~~provide additional analysis and mitigation for impacts to Land Use and Planning;~~
- ~~update the analysis and mitigation of Transportation/Traffic using the City of Goleta's TRAFFIX traffic impact analysis software and Santa Barbara County Association of Governments' (SBCAG) *Congestion Management Plan* conventions; and~~
- ~~incorporate all revisions into summary sections of the EIR.~~

~~The following Recirculated Draft EIR contains only those chapters and sections of the Draft EIR that have been revised. Exhibits in each of the sections of this Recirculated Draft EIR have also been included. The exhibits that have been revised are marked as such.~~

~~Following an additional 45-day public review period on this Recirculated Draft EIR, a Final EIR will be prepared that includes the comments received during both public review periods. Responses to all comments will be provided; however, duplicate comments will only be responded to once.~~

Chapter One

Chapter One
INTRODUCTORY INFORMATION

1.1 INTRODUCTION

The Santa Barbara Airport (Airport) is a City of Santa Barbara-owned and operated facility located in the South Coast region of Santa Barbara County (County) adjacent to the City of Goleta and the University of California, Santa Barbara (UCSB) (**Exhibit 1A**). The approximate 948-acre Airport property is situated roughly eight miles west of downtown Santa Barbara. The Airport is generally bounded by South Los Carneros Road on the west, Hollister Avenue and the Southern Pacific Railroad on the north, South Fairview Avenue on the east, and the UCSB main campus on the south. Regional access to the Terminal occurs from United States (U.S.) Highway 101 (U.S. 101) via Clarence Ward Memorial Boulevard (State Route [SR] 217). The Airport can also be accessed from U.S. 101 via South Fairview Avenue or South Los Carneros Road to Hollister Avenue, which crosses Airport property on its the north side.

The purpose of this Program Environmental Impact Report (EIR) is to provide a programmatic assessment of the Airport's proposed Airport Master Plan (Master Plan) under the *California Environmental Quality Act* (CEQA) (Public Resources Code, §§21000-21177), the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, §§15000-15387), and the City of Santa Barbara (City) CEQA Guidelines. The proposed Master Plan provides a programmatic framework that will guide site-specific future Airport actions, but does not authorize, fund, or carry out any project or activity (including ground-disturbing actions). As a result, approval of the proposed Master Plan will not itself cause any direct impacts. There may be implications, or long-term indirect or cumulative environmental consequences, however, from managing the Airport under this programmatic framework and from activities to implement

the proposed Master Plan. The City's adoption of the Airport Master Plan would constitute a 'project' under CEQA. The City of Santa Barbara is the Lead Agency for the proposed plan under CEQA and is responsible for preparation and certification of the Airport Master Plan Program EIR. The draft Master Plan is available for review at www.FlySBA.com or www.SBA.airportstudy.com.

Future development at the Airport under the proposed Master Plan will also be subject to the *National Environmental Policy Act of 1969* (NEPA), CEQA, various Federal and State special purpose laws, and Federal Aviation Administration (FAA) oversight and approval. Before any ground-disturbing actions take place, they must be authorized in subsequent permitting processes including site-specific environmental analyses. In addition, compliance with existing local laws, regulations, and policies will be required of all future development proposals.

1.2 RELATIONSHIP TO CITY OF SANTA BARBARA GENERAL PLAN

In ~~2010~~2011, the City certified a Final Program EIR ~~for *Plan Santa Barbara*~~ (SCH#2009011031), for the City's ~~proposed~~ General Plan update (General Plan) to guide growth through the year 2030. The Final General Plan EIR addressed several scenarios of growth for the City, and included moderate growth at the Airport in all scenarios. These Airport growth projections were based on the 2003 *Aviation Facilities Plan's* aviation demand forecast which included scenarios for one to four percent annual growth rate of annual enplaned passengers and two percent per year growth in general aviation (GA) aircraft operations.

This current Program EIR on the Airport's Master Plan ~~tiers off of~~utilizes analysis in the City's 2010 Final General Plan EIR, where appropriate. The City's certified Final General Plan EIR is hereby incorporated by reference and is available for viewing at the City's Planning Division and at the following web address: www.SantaBarbaraCA.gov/gov/plan.asp.

This Master Plan Program EIR is intended to allow the planning for future development projects at the Airport, as shown on the Master Plan's recommended development concept plan and proposed Capital Financial Plan, and to streamline each project's individual environmental analysis by incorporating the analysis and recommended mitigation measures from this Program EIR, as appropriate. The State CEQA Guidelines, §15168, states that a Program EIR is "an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

Geographically,

(1) As logical parts in the chain of contemplated actions,
(2) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
(3) As individual activities carried out under the same authorizing statutory of regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."



Exhibit 1A
AIRPORT LOCATION
AND VICINITY MAP

An airport master plan typically requires some baseline assumptions that are used throughout the analysis. The baseline assumptions identified for the Airport's proposed Master Plan include:

- The Airport will continue to operate as a publicly owned primary commercial service airport through the planning period.
- The Airport will continue to support scheduled commercial airline activities.
- The Airport will continue to serve general aviation and corporate business aviation based tenants and transient operations.
- The aviation industry on the national level will grow as forecast by the FAA in its annual Aerospace Forecasts.
- The socioeconomic characteristics of the region will grow as forecast by local and regional agencies.
- A Federal program will be in place through the planning period to assist in funding future capital development needs.

1.3 INITIAL STUDY FINDINGS AND ENVIRONMENTAL SCOPING

An Initial Study was completed on the Airport's proposed Master Plan in June 2014. Based on the findings of this study, an EIR was deemed the appropriate action under CEQA and a Notice of Preparation (NOP) was published in the *Santa Barbara News Press* on June 19, 2014, and distributed through the State Clearinghouse on June 26, 2014. The official review period for the Initial Study began on June 26, 2014, and ended on July 25, 2014. The Initial Study concluded that Potentially Significant Impacts could occur as a result of the proposed project in the following areas:

- Air Quality/Greenhouse Gas Emissions (Construction only)
- Biological Resources
- Cultural Resources
- Geology and Soils/Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Public Utilities (Solid Waste Disposal) (Cumulative)
- Transportation/Traffic

The project's Initial Study was included in the Draft Program EIR as Appendix A.

An Environmental Scoping hearing was conducted on July 24, 2014, at a properly noticed City Planning Commission meeting. Three members of the public provided comment at the hearing, but also submitted their comments in writing. As a result of the hearing and the NOP, the City

received a total of eight comment letters or emails. Agencies or organizations that submitted comment letters included: City of Goleta; Santa Barbara County Council of Governments (SBCAG); Native American Heritage Commission (NAHC); Goleta Slough Management Committee (GSMC); Santa Barbara Audubon Society; and California Department of Fish and Wildlife (CDFW).

The following items were requested to be included in the EIR:

- Impacts on land uses, characteristics, and policies of the City of Goleta due to its proximity to the Airport;
- Inclusion of information necessary for SBCAG (as the airport land use commission) to make a determination regarding the proposed Airport Master Plan's consistency with the Airport Land Use Compatibility Plan;
- A full traffic analysis evaluating any traffic impacts to surrounding streets and roads as well as SR 217 and U.S. 101;
- Provisions for the identification and evaluation of accidentally discovered archaeological resources, pursuant to CEQA §15064.5(f) and other applicable regulations, and coordination, as necessary, with the NAHC;
- In-depth analysis of impacts to resources of the Goleta Slough, including impacts of the proposed Taxiway H ~~extension~~Airfield Safety Project, perimeter fence improvements, an increase in impervious surfaces, and the alteration or degradation of existing drainage patterns;
- Mitigation measures that include improvement of habitat values of the Goleta Slough;
- Discussion of cumulative impacts from area plans, policies and projects;
- Discussion of consistency with Local Coastal Program (LCP) plans, policies, and zoning;
- Discussion of increased flooding due to sea level rise and an evaluation of an Airport relocation strategy.

Two pilots also submitted comments regarding safety issues at the Airport. One stated his support of the Taxiway H Airfield Safety Project~~extension~~ due to safety concerns; the other recommended the use of engineered materials arresting systems (EMAS) at the end of the runways.

All of the issues brought up in the EIR scoping comments are being addressed at some level in the proposed Master Plan itself or in this Program EIR. However, it is not feasible to undertake hydrological, hydrochemical, or biological modeling or quantitative analysis of impacts to habitat values of the Slough at this time. Although the proposed Master Plan provides a "conceptual" development plan for future airport projects over a 20-year timeframe, it does not include any type of design.

Construction impacts, such as grading and noise, drainage, and operational impacts of individual projects must be addressed at a project-specific level at the time that an individual project is proposed. Detailed analysis of any cumulative impacts to Slough resources must also be conducted at that time. These future projects will be subject to evaluation under both Federal and State environmental regulations (i.e., NEPA and CEQA, respectively) prior to the approval of Federal and/or State funding as well as before the issuance of local, City, or coastal development permits.

This EIR does include programmatic mitigation measures to be applied to future individual projects, as warranted.

1.4 PUBLIC AND AGENCY REVIEW OF THE DRAFT AND RECIRCULATED DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORTS

During the 45-day public review period on the Draft Program EIR, from August 31, 2015 through October 16, 2015, the City of Santa Barbara received two written comment letters. Requests were then made by several additional agencies or organizations for a two-week extension of the public review period, which was granted. A total of 11 written comment letters were received by October 30, 2015. In addition, four oral comments were received – one at an Airport Commission meeting, held on September 16, 2015, and three at a City Planning Commission hearing, held on October 1, 2015. All comment letters on the Draft Program EIR and responses to comments are contained in **Appendix A** of this Final Program EIR.

~~Text and exhibit edits have been made in this Recirculated Draft EIR in response to the comments received on the Draft EIR. These text (and exhibit) edits have been primarily to:~~

Text and exhibit edits to the Draft Program EIR were addressed in a Recirculated Draft Program EIR in response to the comments received on the Draft Program EIR. These text (and exhibit) edits were primarily to:

- provide clarification (text and exhibits);
- update information that ~~has~~ had become available since the publication of the Draft Program EIR;
- provide additional analysis and mitigation for impacts to Biological Resources;
- address recent court cases regarding the treatment of sea level rise under CEQA;
- provide additional analysis and mitigation for impacts to Land Use and Planning;
- update the analysis and mitigation of Transportation/Traffic using the City of Goleta's TRAFFIX traffic impact analysis software and Santa Barbara County Association of Governments' (SBCAG) *Congestion Management Plan* conventions; and

- incorporate all revisions into summary sections of the Recirculated Draft Program EIR.

~~The following Recirculated Draft EIR contains only those chapters and sections of the Draft EIR that have been revised. Exhibits in each of the sections of this Recirculated Draft EIR have also been included. The exhibits that have been revised are marked as such.~~
~~Following an additional 45-day public review period on this Recirculated Draft EIR, a Final EIR will be prepared that includes the comments received during both public review periods. Responses to all comments will be provided; however, duplicate comments will only be responded to once.~~

The Recirculated Draft Program EIR contained only those chapters and sections of the Draft Program EIR that were revised. Exhibits in each of the sections of the Recirculated Draft Program EIR were also included, with the revised exhibits marked as such.

The Recirculated Draft Program EIR was made available for public and agency comment from July 15, 2016, to September 13, 2016. Public comment on the Recirculated Draft Program EIR was also received at an Airport Commission meeting on July 20, 2016, and a City Planning Commission hearing on September 1, 2016. A total of 16 written comment letters or emails and three oral comments were received. Two of the oral comments received were followed up with submittal of the comments in writing. All comment letters on the Recirculated Draft Program EIR and responses to comments are contained in **Appendix B** of this Final Program EIR. Text edits have been made to the Final Program EIR in response to comments.

Chapter Two
PROJECT DESCRIPTION

2.1 PROJECT OBJECTIVES

The primary objective of the Santa Barbara Airport (Airport) Master Plan (Master Plan) is to provide the City of Santa Barbara (City) with guidance for future development which will satisfy aviation demand at the Airport while protecting the environment. Accomplishing this objective requires an evaluation of the existing airport so as to make a determination of what actions should be taken to maintain an adequate, safe, and reliable airport facility. The completed Master Plan will detail a program for future capital needs to aid in planning, scheduling, and budgeting.

The City's Airport Department has identified specific goals to be considered in the Master Plan that include:

- Relocation of general aviation facilities and new general aviation improvements.
- Airfield safety improvements.
- Consolidation of automobile parking associated with the Terminal.
- Terminal expansion.

The Master Plan relies on Federal Aviation Administration (FAA)-approved forecasts (approval date: November 13, 2012) of aviation activity at the Airport and provides development scenarios for the short term (2017), intermediate term (2022) and long term (2032). If these growth assumptions are not fully realized, the phasing of recommended improvements would be adjusted to meet actual demand at the Airport. In addition, these development scenarios are not only reflective of the level of activity forecast to occur at the Airport, but are dependent on Federal and State funding cycles and the availability of grant money for aviation projects. Refer to Chapter Two of the Master Plan for a detailed discussion of the Master Plan's forecast methodology and conclusions and to Chapter Six for the Master Plan's proposed Capital Improvement Program (CIP).

2.1.1 Forecast Aviation Activity

Forecast aviation demand for the Airport for three development scenarios identified in the Master Plan are provided in **Exhibit 2A** and are the basis for the cumulative analysis of certain environmental impact categories within this Environmental Impact Report (EIR) such as air emissions and traffic projections. The Master Plan assumes that total operations at the Airport would increase at an average annual rate of 0.6 percent through the forecast period, while enplanements would increase by 2.8 percent annually. The growth in enplanements would occur primarily through increased load factors and average seat capacity on presently occurring flights. Air carrier operational growth is anticipated to be minimal.

Average annual growth in based aircraft and general aviation operations are anticipated to grow at a rate of 1.6 percent and 0.7 percent, respectively. The fleet mix of based aircraft at the Airport is expected to follow a nationwide fleet mix shift from smaller single- and multi-engine piston aircraft towards more business class, turbine-powered aircraft. Business jets based at the Airport are expected to grow 4.5 percent annually.

Air taxi operations are expected to follow national growth trends of 1.7 percent average annual growth, while military activity at the Airport is expected to be only a small factor (approximately one percent of total operations in 2032).

As previously stated in Section 1.2, the City's General Plan considers "moderate growth" at the Airport that was based on the 2003 *Aviation Facilities Plan's* aviation demand forecast which included scenarios for one to four percent annual growth rate of annual enplaned passengers and two percent per year growth in general aviation (GA) aircraft operations. The above forecasted growth projections fall within the City's General Plan assumptions for the Airport.

2.2 PROJECT DESCRIPTION

The proposed Master Plan provides guidance for the Airport's overall development for the next 20 years, i.e., 2012 to 2032. This development is discussed by subarea within the Airport in Section 2.2.2. No actual development projects are proposed at this time. Any future

AVIATION DEMAND FORECAST SUMMARY

	2011	2017	2022	2032
ENPLANEMENTS & AIR CARGO				
Annual Enplanements	365,769	440,000	503,400	657,000
Air Cargo (tons)	2,058	2,600	2,800	3,400
ANNUAL OPERATIONS				
Itinerant				
Air Carrier	21,442	22,200	22,600	25,000
Air Cargo	430	540	600	700
Other Air Taxi	4,307	4,800	5,200	6,100
General Aviation	43,581	45,000	48,300	53,800
Military	1,135	1,200	1,200	1,200
Total Itinerant	**70,895**	**73,740**	**77,900**	**86,800**
Local				
General Aviation	37,132	39,000	41,300	46,100
Military	258	250	250	250
Total Local	**37,390**	**39,250**	**41,550**	**46,350**
Total Annual Operations	**108,285**	**112,990**	**119,450**	**133,150**
BASED AIRCRAFT				
Single Engine	125	132	135	144
Multi-Engine Piston	13	12	9	7
Turboprop	8	10	12	15
Jet	22	28	37	55
Helicopter	5	7	8	10
Other	5	5	5	5
Total Based Aircraft	**178**	**194**	**206**	**236**

PEAK ACTIVITY PROJECTIONS

	2011	2017	2022	2032
AIRLINE ENPLANEMENTS				
Annual Enplanements	365,769	440,000	503,400	657,000
Peak Month	34,685	42,240	48,326	63,072
Design Day	1,119	1,389	1,590	2,075
Design Hour	222	275	315	411
AIRLINE OPERATIONS				
Annual	21,442	22,200	22,600	25,000
Peak Month	1,916	2,437	2,481	2,744
Design Day	62	80	82	90
Design Hour	10	13	13	14
GENERAL AVIATION OPERATIONS				
Annual Operations	80,713	84,000	89,600	99,900
Peak Month	7,519	8,988	9,587	10,689
Busy Day	341	408	435	485
Design Day	247	296	315	352
Design Hour	27	33	35	39
TOTAL AIRPORT OPERATIONS				
Annual	108,285	112,990	119,450	133,150
Peak Month	10,004	11,525	12,184	13,581
Design Day	329	379	401	447
Design Hour	31	36	38	42

development subsequent to approval of the Master Plan would be fully addressed under both the *National Environmental Policy Act* (NEPA) *of 1969* and the *California Environmental Quality Act* (CEQA) and State of California (State) CEQA Guidelines, as appropriate.

2.2.1 Recommended Development Concept Overview

The overall development concept of the Master Plan is shown in **Exhibit 2B**. Development projects at the Airport would be focused in one of three areas: airfield safety improvements; landside redevelopment north of Runway 7-25; or improvements around the Terminal. No new development is proposed in the Master Plan for the Airport Industrial Area specific planning area located north of Hollister Avenue.

In 2011, the Airport was operating at 48 percent of its annual service volume (ASV)[1]; FAA recommends that when an airport reaches 60 percent of its total ASV then capacity-increasing development should be considered. The Airport is not expected to reach an operational level within the Master Plan's 20-year planning horizon that would require capacity-increasing improvements.

Recommended Airfield Development

Recommended airfield safety projects are highlighted on **Exhibit 2C**. Improvements to Runway 7-25 involve the extension of Taxiway H to the Runway 7 threshold to provide a full-length parallel taxiway on the north side of the runway and the construction of two new taxiway connectors. The existing glideslope antenna would be relocated to allow for the taxiway extension. The purpose of these improvements is to increase taxiway circulation safety and efficiency of the Airport (see Appendix A, Recirculated Draft Program EIR, which contains FAA's Local Runway Safety Action Plan for the Airport, dated April 19, 2012). By providing a full-length parallel taxiway north of Runway 7-25, aircraft utilizing the north general aviation ramps would no longer have to cross the active primary runway to get to the Runway 7 threshold.

Exhibit 2D shows the expected disturbance area for this recommended airfield safety project. The new taxiway would be 50 feet wide with 20-foot shoulders; an associated taxiway object free area (TOFA) would extend 93 feet on each side of the taxiway centerline. Including the area necessary for relocation of the existing glideslope antenna, an approximate 12.4-acre area would be disturbed with a net increase of approximately five acres of impervious surface. (This net increase in impervious area includes the removal of approximately 1.14 acres of pavement associated with the existing north general aviation apron to provide improved taxiway connection design from Runway 7 to the apron area.) The existing taxiway would be extended westerly approximately 2,350 feet and would result in the permanent loss of approximately 6.1 acres of existing habitat due to the installation of pavement for the taxiway and taxiway shoulders. The remainder the disturbance area would be graded to FAA taxiway safety

[1] Annual Service Volume (ASV) is defined as the number of annual aircraft operations that may be accommodated by the runway system at an airport.

standards, but could then be allowed to revegetate with vegetation similar to what is currently present (i.e., brome grass).

On Taxiway G, paved islands would be marked and lighted adjacent to either side of Runway 7-25 at its eastern end as well as at the northern end of crosswind Runways 15R and 15L. The purpose of the paved islands is to remove unnecessary pavement width at intersections between taxiways and the runways. When these intersections are too wide, important airfield signage has to be located too far from the areas of aircraft movement. By reducing the pavement width in these areas, airfield signage would be easier for pilots to use effectively. In addition, flush-mounted hold marking lighting is planned at the entrances to Runways 15R and 15L to increase situational awareness for pilots to help mitigate runway incursions.

The Runway 15L threshold is currently displaced by 217 feet. This displacement was originally put in place to account for a building north of Hollister Avenue that obstructed the approach path to the runway. The obstructing building has since been demolished. Therefore, the displaced threshold is planned to be removed so that the full runway length (4,178 feet) can be utilized for landing operations.

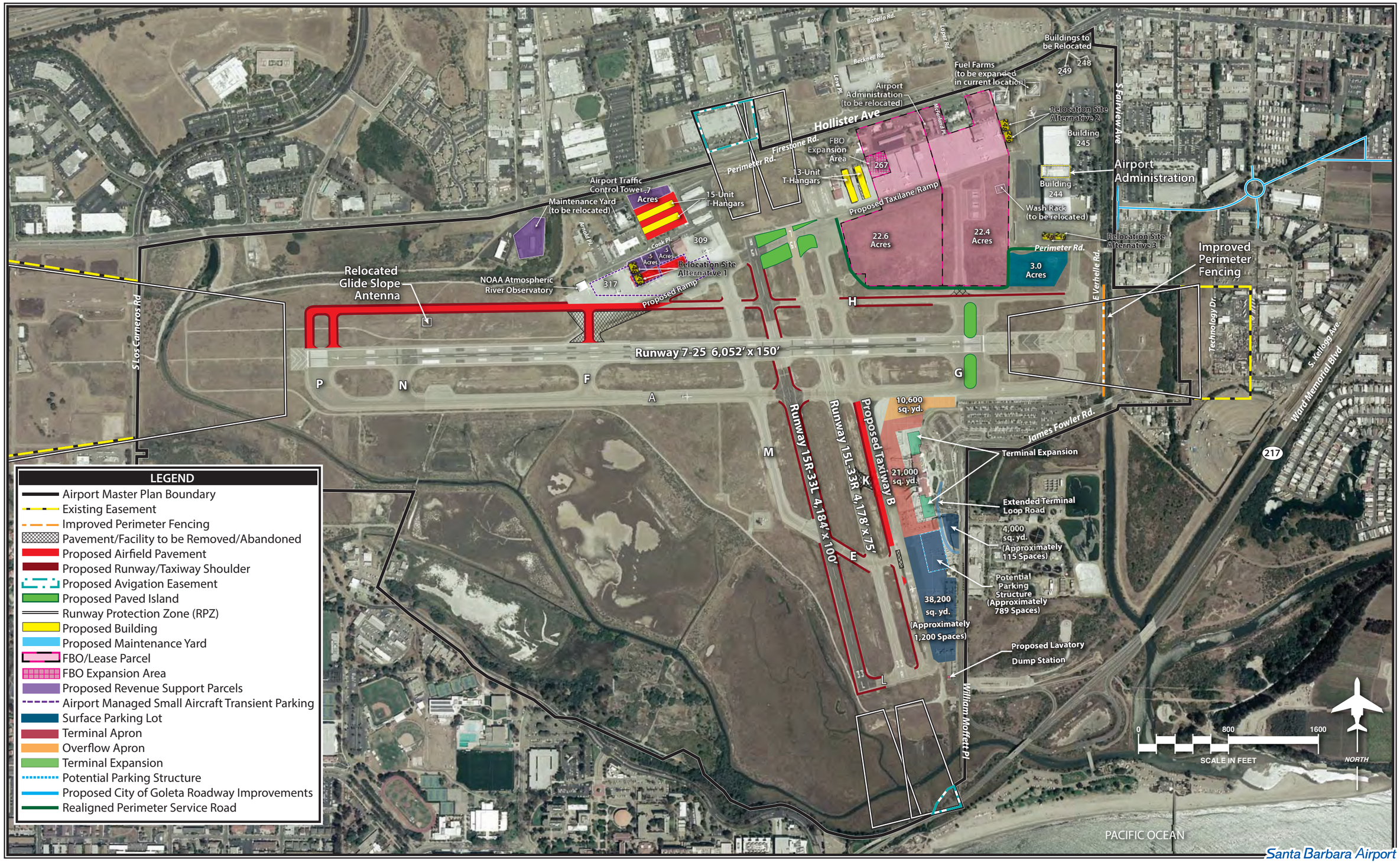
Avigation easements would be acquired over portions of the runway protection zones (RPZs) for crosswind Runways 15R-33L and 15L-33R that occur off the Airport north of Hollister Avenue and south of the Airport over Ward Memorial Boulevard. These easements are necessary to give the Airport control over land use decisions on property near the ends of the runways to prevent incompatible land uses and obstructions that may affect the safe operation of aircraft.

~~For safety reasons, south of Taxiway A,~~ Taxiway B would be realigned to provide a consistent 200-foot separation from Runway 15R-33L as well as additional apron space at the Terminal, and existing connector Taxiway K would be removed. Small changes to pavement and the existing apron would occur in the vicinity of Taxiway E's intersection with the realigned Taxiway B to eliminate direct access to the runway from the apron areas, which will improve the safety and efficiency of this area for aircraft movement (see **Exhibit 2C**). In addition, shoulder pavement is proposed for Taxiways B, D, E, H, and L as well as Runway 15R-33L.

An existing perimeter fence segment at the end of Runway 25 along South Fairview Avenue would also be improved. This fence prevents unauthorized access to the Airport and would be improved to an eight-foot high chain link fence.

Recommended North Landside Development

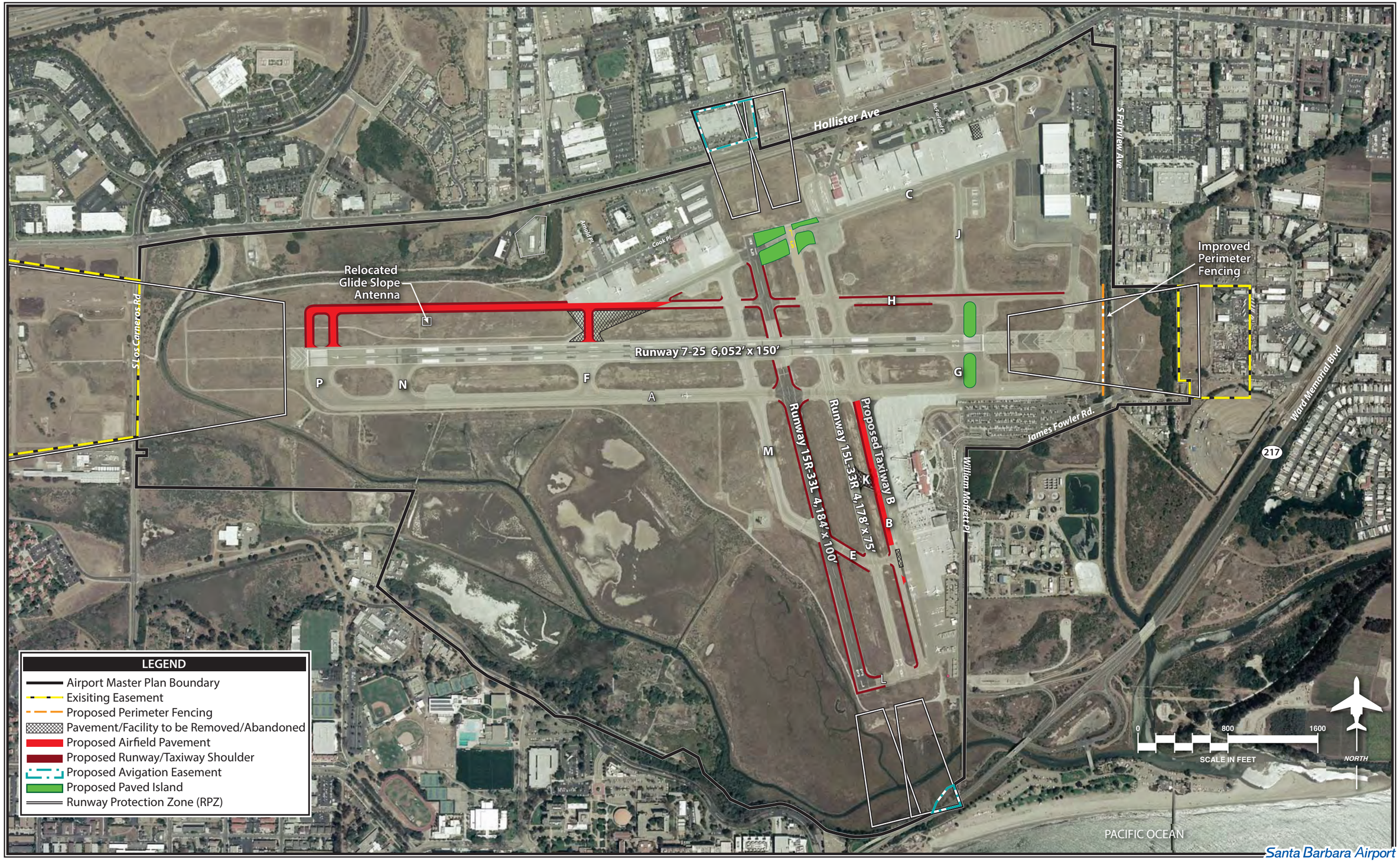
The proposed north landside development is actually a redevelopment of the area (see **Exhibit 2E**). In order to provide for future expansion of terminal area facilities, general aviation facilities are planned to be consolidated on the north side of the airfield. This would provide distinct and separate functional areas for the primary aviation uses on the Airport. The following changes are proposed to provide the Airport with additional opportunities for revenue and to meet the future needs of general aviation at the Airport, and would occur as funding becomes available and as



Santa Barbara Airport

Exhibit 2B

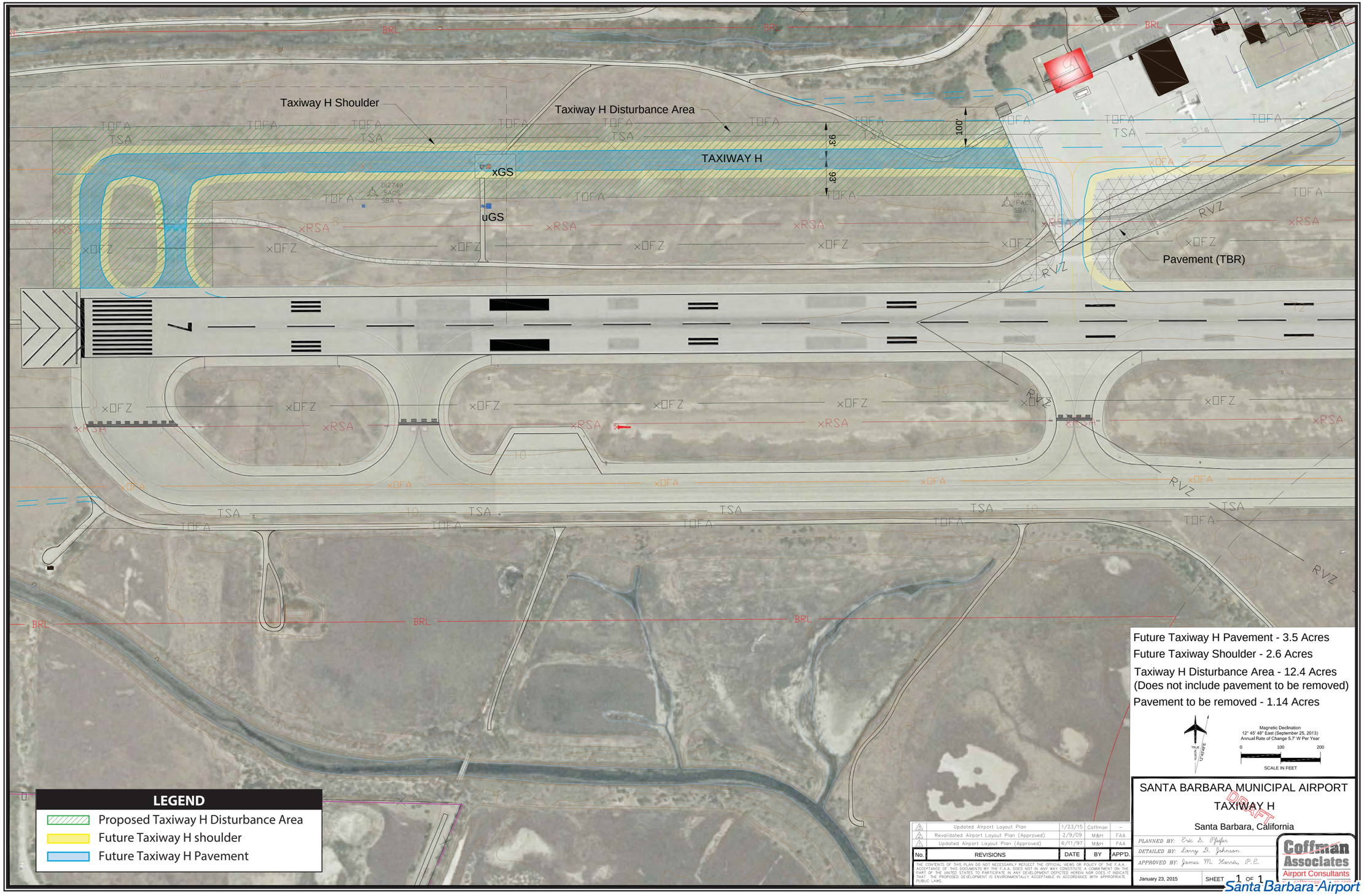
RECOMMENDED DEVELOPMENT CONCEPT OVERVIEW



Santa Barbara Airport

Exhibit 2C

RECOMMENDED AIRFIELD DEVELOPMENT CONCEPT



No.	REVISIONS	DATE	BY	APP'D.
3	Updated Airport Layout Plan	1/23/15	Coffman	–
2	Revalidated Airport Layout Plan (Approved)	2/9/09	M&H	FAA
1	Updated Airport Layout Plan (Approved)	6/11/97	M&H	FAA

THE CONTENTS OF THIS PLAN DO NOT NECESSARILY REFLECT THE OFFICIAL VIEWS OR POLICY OF THE F.A.A. ACCEPTANCE OF THIS DOCUMENTS BY THE F.A.A. DOES NOT IN ANY WAY CONSTITUTE A COMMITMENT ON THE PART OF THE UNITED STATES TO PARTICIPATE IN ANY DEVELOPMENT DEPICTED HEREIN NOR DOES IT INDICATE THAT THE PROPOSED DEVELOPMENT IS ENVIRONMENTALLY ACCEPTABLE IN ACCORDANCE WITH APPROPRIATE PUBLIC LAWS.

SANTA BARBARA MUNICIPAL AIRPORT

TAXIWAY H

DRAFT

Santa Barbara, California

PLANNED BY: Eric S. Pfeifer
DETAILED BY: Larry B. Johnson
APPROVED BY: James M. Harris, P.E.

Coffman Associates
Airport Consultants

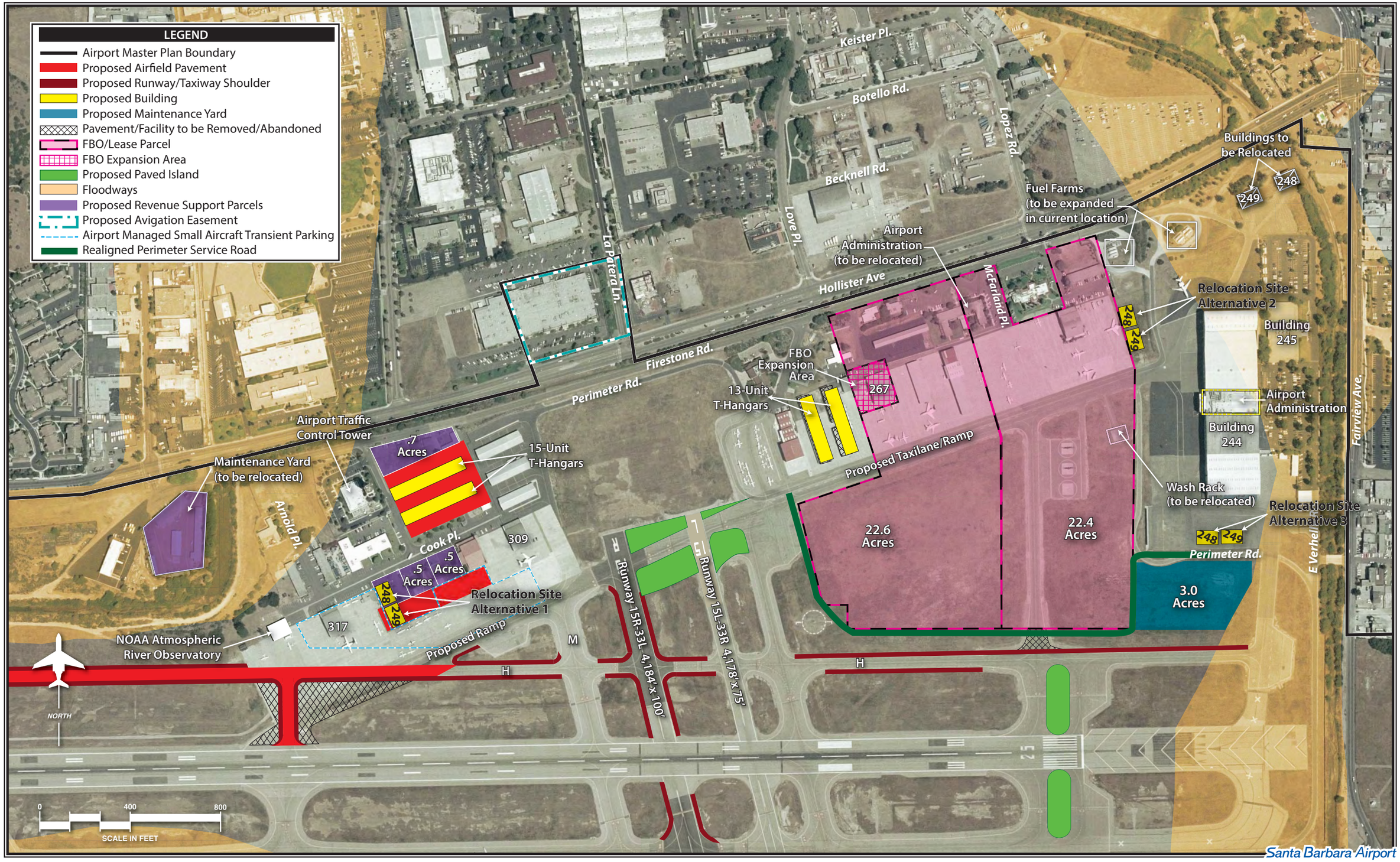
January 23, 2015

SHEET 1 OF 1

Santa Barbara Airport

Exhibit 2D

PROPOSED TAXIWAY H EXTENSION



Santa Barbara Airport

Exhibit 2E

RECOMMENDED NORTH LANDSIDE DEVELOPMENT CONCEPT

increased aviation activity creates a need for the improvement. Some changes are also proposed to address existing unsatisfactory conditions.

On the western side –

- An existing maintenance yard that is currently west of Los Carneros Creek within a Regulatory Floodway would be relocated to an area south of Building 244;

- Airport-managed small aircraft transient parking would be provided on, and adjacent to, the existing north general aviation apron;

- Four new revenue support parcels would be designated along Cecil Cook Place and Norman Firestone Road with a paved connection to the existing north general aviation apron;

- Two 15-unit T-hangars and associated pavement would be constructed north of Cecil Cook Place with a paved connection to the existing apron;

- Buildings 309 and 317 would be retained as historic structures;

- One potential site is identified to relocate historic structures (Buildings 248 and 249) out of the Regulatory Floodway.

On the eastern side –

- Two 13-unit T-hangar facilities would replace existing hangar facilities that are in poor condition;

- Two fixed base operator (FBO) parcels (22.4 and 22.6 acres) would be made available for lease;

- Three existing buildings would be removed within the FBO lease areas to clear ramp space;

- Building 267 would be retained as an historic structure (shown on **Exhibits 2B** and **2E** as a FBO expansion area , indicating that the FBO lessee would have the option of expanding its lease area to include the building under the condition that it be maintained as a historic structure);

- The Airport Administration offices would be relocated to Building 244 in the eastern part of the Airport;

- Two existing fuel farms would be expanded in their current location off of Hollister Avenue to provide additional aboveground storage of Jet A fuel;

- A 3-acre maintenance yard would be constructed to replace the existing maintenance yard that is currently west of Los Carneros Creek;

- Buildings 248 and 249 would be relocated out of the Regulatory Floodway;

- Two potential sites are identified to relocate historic structures (Buildings 248 and 249) out of the Regulatory Floodway.

Recommended Terminal Area Development

As previously discussed under Recommended Airfield Development and as shown on **Exhibit 2F**, Taxiway B in the vicinity of the Terminal is proposed to be realigned to provide ~~an acceptable~~a consistent separation from Runway 15L-33R as well as additional apron space at the Terminal. In addition, to accommodate forecast activity levels at the Airport, future terminal expansion (16,190 square feet [sf]) may be needed as well as approximately 31,600 square yards (sy) of Terminal and overflow apron. The Master Plan expects that by the long-term enplanement milestone, two additional gates and three passenger loading bridges would be required to fully meet the Airport's needs. The expansion of these facilities would require the relocation of general aviation facilities south of the Terminal to the north side of the airfield as previously mentioned in the Recommended North Landside Development discussion.

If needed, additional parking would be provided by constructing/expanding two surface parking lots. An additional 1,315 parking spaces could be obtained overall. The Terminal's loop road would be extended to access the new surface parking lots and the expanded Terminal.

A lavatory dump station is also planned approximately 200 feet east of the southern end of Taxiway B. This station would improve both Airport safety and efficiency by providing a more convenient site for the disposal of sanitary wastes from commercial airline aircraft. Currently, the only dump station is located on the north side of the Airport and lavatory carts servicing the airlines have to drive across the airfield to access the existing lavatory dump station. This is not only inefficient, but it creates a runway incursion potential.

2.2.2 Proposed Capital Improvement Plan

Exhibit 2G shows a list of potential future projects that might be implemented at the Airport during the planning period of the Master Plan. The exhibit also indicates in which area of the Airport the improvement would be located and what the anticipated timeframe for each project is according to the CIP. These projects are planned to occur within the first five years (years 1-5), the second five years (years 6-10), or the last ten years (years 11-20) of the Master Plan's 20-year planning horizon. As discussed previously, the implementation of the proposed CIP is dependent on the availability of Federal and State funding.

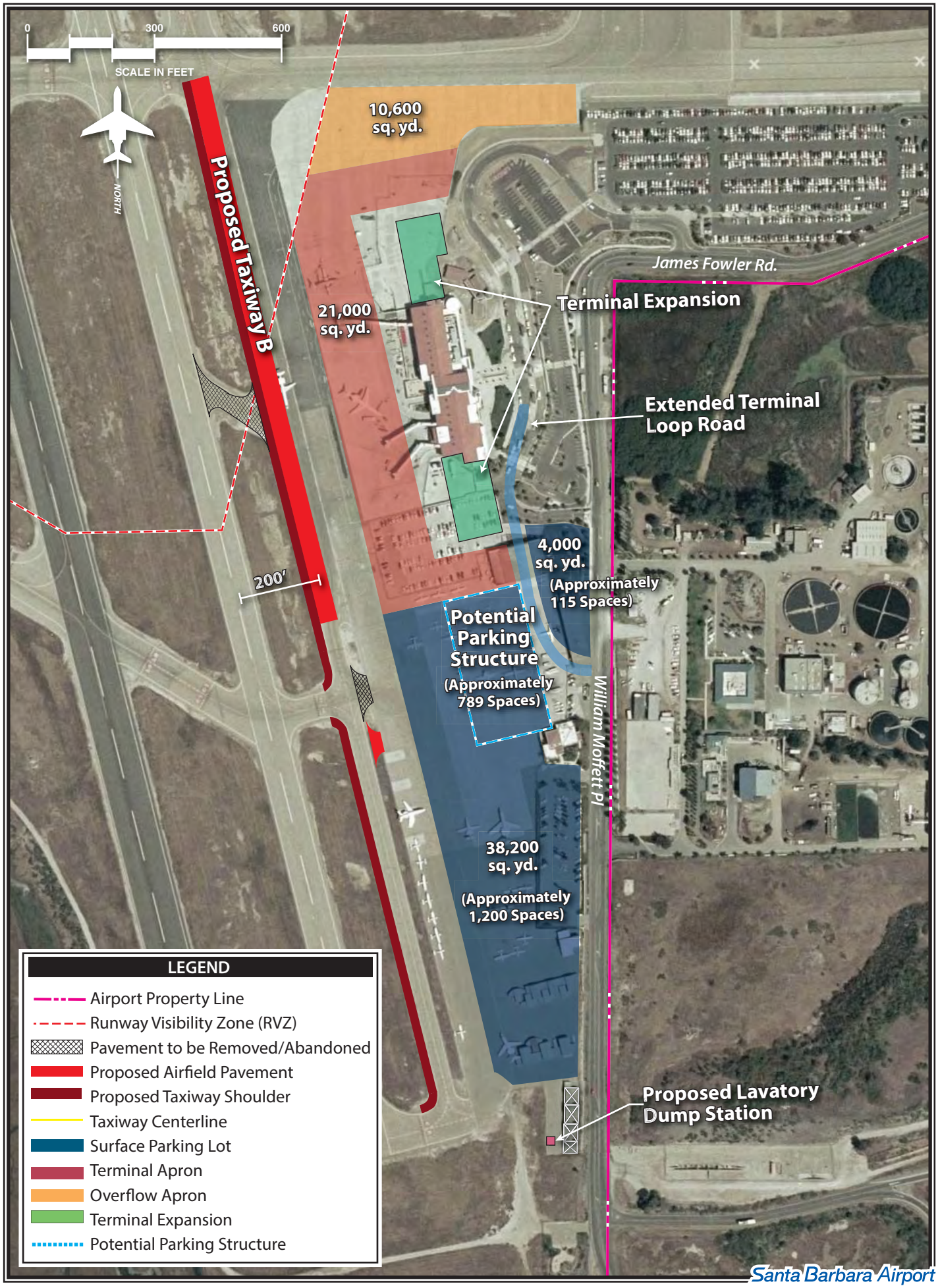
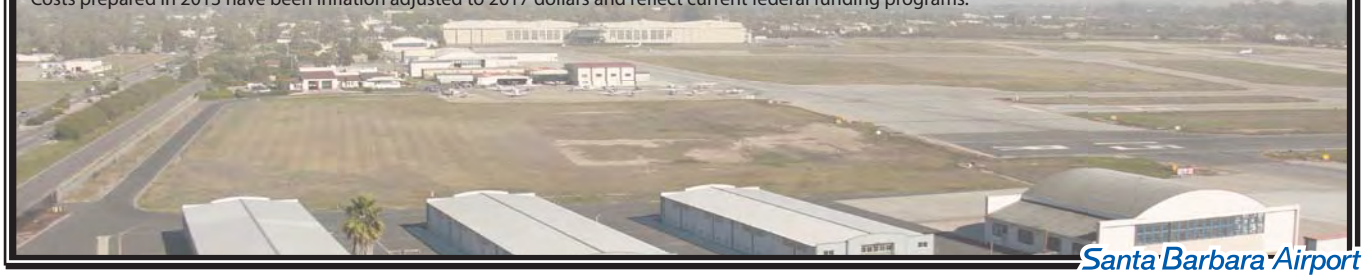


Exhibit 2F
RECOMMENDED TERMINAL AREA CONCEPT

Project Description	AIP Eligible	Local Share	Total Costs
Short Term Program (Years 1-5)			
FY2018 (1) Upgrade Airport Security System	$906,600	$93,400	$1,000,000
(2) GA Pavement Replacement	$907,000	$93,000	$1,000,000
(3) Aircraft Rescue and Firefighting Vehicle Replacement	$747,945	$77,055	$825,000
(4) Add Passenger Loading Bridge to Terminal	$-	$1,200,000	$1,200,000
FY2019 (5) Taxiway H Extension - Design Only	$2,629,140	$270,860	$2,900,000
FY2020 (6) Taxiway D and Northeast Pavement Rehabilitation	$1,909,347	$195,776	$2,105,123
(7) Acquire Avigation Easement (7.4 Acres) for Runway Protection Zone - Phase 1	$634,620	$65,380	$700,000
(8) Sweeper Replacement	$226,750	$23,250	$250,000
FY2021 (9) Extend Taxiway H to Runway 7 Threshold	$10,185,890	$1,049,374	$11,235,264
FY2022 (10) Taxiway A, B, C Rehabilitation	$2,636,030	$270,288	$2,906,318
Short Term Program Total	**$20,783,322**	**$3,338,383**	**$24,121,705**
Intermediate Term Program (Years 6-10)			
(1) Mark/Paint Airfield Islands	$728,000	$75,000	$803,000
(2) Construct Lavatory Dump Station	$1,019,018	$104,982	$1,124,000
(3) Install Trash Compactor at Terminal Building	$436,981	$45,019	$482,000
(4) Remove Taxiway K and Realign Taxiway E Stub	$120,578	$12,422	$133,000
(5) Acquire Avigation Easement (1.3 Acres) for Runway Protection Zone - Phase 2	$85,220	$8,780	$94,000
(6) GA Pavement Replacement	$907,000	$93,000	$1,000,000
(7) Mothball Hangars (Buildings #248 & #249)	$-	$213,000	$213,000
(8) Terminal Facility Addition (5,000 sf to the North)	$4,730,639	$487,361	$5,218,000
(9) Extend Terminal Loop Road to the South	$1,043,497	$107,503	$1,151,000
(10) Convert Atlantic Aviation Ramp to Long Term Surface Parking Lot (38,200 sy - Fencing/Marking/Circulation)	$1,145,942	$118,058	$1,264,000
(11) Expand Short Term Surface Parking Lot (4,000 sy)	$129,644	$13,356	$143,000
(12) Expand Terminal Apron (7,000 sy) Removing Rental Car Ready/Return Lot	$1,739,765	$179,235	$1,919,000
(13) Relocate Maintenance Yard Site Preparation/Grading and Extend Utilities, Perimeter Road Realignment	$5,735,152	$590,848	$6,326,000
(14) Construct T-Hangar Facilities (Two 13-Unit Structures)	$-	$3,340,000	$3,340,000
(15) Relocate Airport Administration Offices to Building #244	$-	$107,000	$107,000
(16) Airfield Pavement Maintenance	$2,407,023	$247,977	$2,655,000
Intermediate Term Program Total	**$20,228,459**	**$5,743,541**	**$25,972,000**
Long Term Program (Years 11-20)			
(1) Terminal Facility Addition (11,200 sf to the South)	$9,243,694	$952,306	$10,196,000
(2) Realign Taxiway B	$2,735,212	$281,788	$3,017,000
(3) Pave Runway 15R-33L and Taxiway E Shoulders	$1,264,707	$130,293	$1,395,000
(4) Construct Ramp (5,700 sy)	$1,485,011	$152,989	$1,638,000
(5) Clear/Grade Site for T-Hangar Facilities	$-	$1,550,000	$1,550,000
(6) Construct Taxilanes/Ramp for T-Hangar Facilities	$-	$5,004,000	$5,004,000
(7) Construct T-Hangar Facilities (Two 15-Unit Structures)	$-	$3,854,000	$3,854,000
(8) Relocate Hangars (Buildings #248 & #249)	$-	$3,304,000	$3,304,000
(9) Airfield Pavement Maintenance	$4,814,046	$495,954	$5,310,000
Long Term Program Total	**$19,542,670**	**$15,725,330**	**$35,268,000**
TOTAL PROGRAM COSTS	**$60,554,451**	**$24,807,254**	**$85,361,705**

Sources: Master Plan project estimates prepared by Kimley-Horn and Associates in 2013.
SBA Airport Capital Improvement Program (ACIP) 2018-2022, prepared January 31, 2017.
Costs prepared in 2013 have been inflation adjusted to 2017 dollars and reflect current federal funding programs.



Santa Barbara Airport

REVISED

Exhibit 2G
CAPITAL IMPROVEMENT PROGRAM

2.3 REGIONAL SETTING

The Airport is located in the Goleta Valley on the South Coast of Santa Barbara County. Views in the area are dominated by the Santa Ynez Mountains, which form the backdrop for all view sheds to the north. The Airport is surrounded by urban and suburban development to the north and east, open space on the west, and by the University of California, Santa Barbara (UCSB) campus and the Pacific Ocean to its south and southwest.

The majority of the Airport is located within the historic boundaries of Goleta Slough, one of the few remaining saltmarsh habitats in California. Airport development between 1928 and the 1970s resulted in the filling of portions of Goleta Slough to accommodate runways, the conversion of grassland to accommodate a terminal, and the establishment of flood control channels and dikes, all of which caused the formation of basins within Goleta Slough that gradually became cut off from tidal circulation. Approximately half of the wetlands in the Goleta Slough are subject to tidal flow when the Slough mouth is open. Currently, the parts of the Airport not occupied by facilities comprise the major portion of the Goleta Slough Ecological Reserve (GSER) and the Goleta Slough State Marine Conservation Area (GSSMCA).

Most of the Airport is within the 100-year floodplain with two different Regulatory Floodways traversing the property. The only portions of the Airport that are not located within the 100-year floodplain are sections of the Airport Industrial Area located north of Hollister Avenue, a small area of higher elevation along Mesa Road, and the terminal area, which was constructed at a higher elevation to be out of the floodplain.

The Airport, including Goleta Slough, is located within the South Coast watershed, an approximate 416-square mile area that is comprised of smaller watersheds associated with various creeks. Four creeks, Tecolotito, Carneros, Las Vegas and San Pedro, along with designated tidal channels such as Mesa Road Tide Channel, traverse the Airport property. The entire Airport is flat and near sea level. Vegetation consists of pickleweed coastal salt marsh, a tidal estuary, a variety of seasonal wetlands, upland shrub and herbaceous communities, a small amount of woodland habitat, and transitional areas between upland and wetland habitats.

Cultural resources in the Goleta area, and especially in proximity to Goleta Slough, are numerous and include prehistoric and historic-era Native American sites as well as historic-era resources dating back to the late 1800s.

2.4 REQUIRED DISCRETIONARY ACTIONS

The proposed Airport Master Plan requires formal adoption by the City of Santa Barbara City Council. ~~will be required to formally adopt the proposed Airport Master Plan.~~ Based on a preliminary Local Coastal Program (LCP) policy conformance analysis completed as part of this Program EIR, the City will also consider the initiation of an LCP amendment, a City of Santa Barbara General Plan amendment, and a rezone for the portion of a future Taxiway H Airfield Safety Project that would occur within the GSER.

~~An updated Airport Layout Plan has been submitted to the FAA for review and was approved in May 2015. NEPA review will be completed on a project-by-project basis as part of the Airport Improvement Program grant review process.~~

2.5 DISCRETIONARY ACTIONS REQUIRED FOR FUTURE AIRPORT PROJECTS RECOMMENDED BY THE MASTER PLAN ~~OTHER PUBLIC AGENCY APPROVALS REQUIRED~~

Future projects recommended in the Master Plan would require discretionary approvals at the time that they are ready for implementation. For example, the Taxiway H Airfield Safety Project and the relocation of the glideslope antenna, which are related projects proposed to be located within the City's G-S-R/A-A-O (Goleta Slough Reserve/Airport Approach and Operations) zone, would require the approval of a Coastal Development Permit as well as an LCP amendment/rezone and General Plan Amendment. All projects within Goleta Slough, which is part of the California Coastal Commission's (CCC) original jurisdiction, require CCC approval via the Coastal Development Permit process.

If structures or fill is placed in wetlands or other jurisdictional waters of the United States (U.S.), a Section 404 permit under the *Clean Water Act* would be necessary from the U.S. Army Corps of Engineers (USACE). Similarly, projects that would impact waters of the State require a Section 401 Water Quality Certification from the Central Coast Regional Water Quality Control Board (RWQCB).

The California Department of Fish and Wildlife (CDFW) is a Responsible Agency for actions involving the GSER in its role as manager of Title 14-administered lands. Changes to the GSER could involve an amendment to the 1987 Cooperative Agreement between the City of Santa Barbara and CDFW for management of the GSER.[2] CDFW is also a Trustee Agency for fish and wildlife resources of the State (California Fish and Game Code [CFGC], §§711.7(a) and 1802; Public Resources Code [PRC] §21070; CEQA Guidelines §15386(a)). It has the regulatory authority to issue Lake and Streambed Alteration (LSA) Agreements (CFGC §1600 et seq.) and Incidental Take Permits under the *California Endangered Species Act* [CESA] (CFGC § 2050 et seq.).~~n amendment to the Cooperative Agreement between the City of Santa Barbara and the California Department of Fish and Wildlife (CDFW) for management of the GSER would also be necessary.~~

All ~~actions~~ future airport actions would be subject to ~~future~~ review by the City under CEQA; this programmatic EIR will be used to help determine the appropriate subsequent CEQA review. Future projects will also be evaluated for their conformance to the programmatic mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) of this Final Program EIR.

The following City approvals or resource agency permits may be required for ~~other~~ specific actions occurring subsequent to approval of the Master Plan:

[2] CDFW is also the manager of the Goleta Slough State Marine Conservation Area, which overlaps a portion of the GSER. However, no recommended Master Plan projects are located within this Marine Conservation Area.

- Actions affecting potential historic properties would require review by the Historic Landmarks Commission;

- Building and landscape plans would require review by the Architectural Board of Review;

- Actions within Special Flood Hazard Areas, including the floodways present at the Airport, would require a City flood development permit or variance per Chapter 22.24, Floodplain Management of the City *Municipal Code*;

- Changes in the amount or location of impervious surfaces at the Airport would need to be incorporated into the Airport's storm water pollution prevention plan (SWPPP) and associated Section 401 *Clean Water Act* permit and may require review and approval by the Regional Water Quality Control Board. The City's Storm Water Management Program (SWMP) would also need to be updated to incorporate the changes; and

- A City-approved Coastal Development Permit would be required for development projects within the Coastal Zone, with the exception of any projects within Goleta Slough, which is part of the ~~California Coastal Commission's (CCC)~~ CCC's Original Jurisdiction and, thus, would require CCC approval.

- ~~Changes to the Goleta Slough Ecological Reserve require consultation with CDFW; and~~

- ~~If structures or fill is placed in wetlands or other jurisdictional waters of the United States (U.S.), a Section 404 permit under the *Clean Water Act* would be necessary from the U.S. Army Corps of Engineers.~~

For Santa Barbara County, the Santa Barbara County Association of Governments (SBCAG) functions as the County's airport land use commission (ALUC). Prior to City certification of this Program EIR, the ALUC will have an opportunity to review and comment on the document. Once the proposed Master Plan has been adopted, SBCAG will be responsible for incorporating any changes into the current Airport Land Use Compatibility Plan (ALUCP) for the Airport. According to California Public Utilities Code (PUC) §21676(c), "each public agency owning any airport within the boundaries of an airport land use commission plan shall, prior to modification of its airport master plan, refer such proposed change to the airport land use commission." The ALUC must then determine whether the proposed airport master plan is consistent or inconsistent with the adopted ALUCP. When an inconsistency exists between a proposed airport master plan and an adopted ALUCP, the ALUC has the option of first modifying its plan to reflect the assumptions and proposals of the airport master plan. This is consistent with the concept that an ALUCP is based on a current airport master plan or airport layout plan (see Section 6.3.4, *California Airport Land Use Planning Handbook* [Caltrans 2011]).

Finally, all future development projects would require FAA approval. FAA's statutory mission is to ensure the safe and efficient use of navigable airspace in the U.S. Thus, FAA must ensure that future airport projects do not derogate the safety of aircraft and airport operations at the Airport. Moreover, it is the policy of FAA under Title 49 United States Code (USC) §47101(a)(6) that airport

development projects provide for the protection and enhancement of natural resources and the quality of the environment of the U.S.

FAA is the Lead Agency for airport development projects under the *National Environmental Policy Act* (NEPA). NEPA review is completed by FAA on a project-by-project basis as part of the FAA's Airport Improvement Program grant review process. The City's Airport Layout Plan (ALP) was updated to reflect the proposed Master Plan, submitted to the FAA for review, and conditionally approved in May 2015. A conditional approval from FAA means that future airport projects depicted on the ALP are subject to evaluation under NEPA prior to moving forward.

Chapter Three

Chapter Three
PROJECT ALTERNATIVES

Section 15126.6 of the *California Environmental Quality Act* (CEQA) Guidelines requires that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to a project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the substantial effects of the project, and to evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project and is not required to consider alternatives which are infeasible. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

The CEQA Guidelines require that a "no project" alternative be evaluated, and that an environmentally superior alternative be designated. If the alternative with the fewest or least severe environmental impacts is the "no project" alternative, one of the other alternatives should be designated environmentally superior. Alternative locations to a project must also be considered; however, if the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion in the EIR. Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the Lead Agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative.

The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the Lead Agency but were re-

jected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. If an alternative would cause one or more significant effects in addition to those caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

3.1 SUMMARY OF THE MASTER PLAN ALTERNATIVE ANALYSIS

The primary objective of the Santa Barbara Airport Master Plan (Master Plan) is to provide the City of Santa Barbara (City) with guidance for future development which will satisfy aviation demand at the Airport while protecting the environment. The City's Airport Department has identified specific goals to be considered in the Master Plan that include:

- Relocation of general aviation facilities and new general aviation improvements.
- Airfield safety improvements.
- Consolidation of automobile parking associated with the Terminal.
- Terminal expansion.

Chapter Five of the proposed Master Plan identifies several design alternatives that were reviewed by Airport staff and the Airport Master Plan Advisory Committee (PAC) in the form of draft working papers. These working papers were also made available to the public via a series of public workshops as well as through a link on the Airport's website: www.FlySBA.com. The process utilized in assessing airside and north landside development alternatives involved a detailed analysis of short- and long-term requirements, as well as future growth potential. Current airport design standards were considered at each stage of development. **Exhibit 3A** lists the planning items considered when identifying alternatives based on the Master Plan's overall goals listed above.

Initially, the planners developed two airfield safety improvement alternatives, three terminal area improvement alternatives, and four north landside redevelopment alternatives (refer to Chapter Five of the Master Plan). After several iterations based on PAC and Airport staff input, these initial alternatives were refined and two airfield safety improvement alternatives, two terminal area improvement alternatives, and two north landside redevelopment alternatives were set forth. A summary of the refined alternatives and the potential environmental issues identified for each is provided in **Exhibit 3B**.

AIRFIELD CONSIDERATIONS



- Mitigation of Taxiway "Hot Spots"
- Extend Taxiway H to Runway 7 Threshold
- Exit Locations
- Visual Approach Aid for Runway 15R-33L
- Protection of Runway Protection Zones (RPZs)
- Full-Perimeter Security Fencing

GENERAL AVIATION CONSIDERATIONS



- Consolidation of General Aviation Facilities on North Side
- Aircraft Storage Hangar Needs
- Public General Aviation Parking Needs
- Fuel Storage Needs
- Helicopter Parking
- Locations for New Maintenance Facilities

TERMINAL & OTHER CONSIDERATIONS



- Parking Facility Needs
- Gate Apron and Overflow Parking
- Lavatory Dump Station
- Trash Compactor
- Facility Expansion

Santa Barbara Airport

		Summary	Environmental Issues
Airfield Alternatives	1	• Extends Taxiway H to Runway 7 threshold • Maintains three-runway airfield • Eliminates Runway 15L displaced threshold • Realigns Taxiway B (200-foot separation from Runway 15R-33L south of Taxiway A) • Reconfigures north end of Runways 15R and 15L to eliminate wide pavement areas	• Taxiway H extension in area zoned as G-S-R, Goleta Slough Reserve
	2	• Converts Runway 15L-33R into Taxiway Q • Extends Taxiway H to Runway 7 threshold • Realigns Taxiway B (160-foot separation from proposed Taxiway Q) • Reconfigured north end of Runway 15 and proposed Taxiway Q to remove excess pavement and to construct a bypass taxiway	• Taxiway H extension in area zoned as G-S-R, Goleta Slough Reserve
Terminal Area Alternatives	1	• Split north/south expansion of terminal facility and apron • Development of new parking lots south of terminal ºProposed future parking structure south of terminal once demand calls for its construction (building height up to 40' allowed) ºNew parking spaces without structure: approximately 1,315 ºNew parking spaces with structure: approximately 1,800 ºOpportunities for premium parking rates, cell phone waiting lot, and/or valet services • Extension of Terminal Loop road to the south • Considers realignment of Taxiway B (as proposed in Refined Airfield Alternative 1)	• Terminal improvements in area mapped as a Moderate Sensitivity Zone for archaeological resources • May require archaeological monitoring during excavation activities
	2	• Considers conversion of Runway 15L-33R to Taxiway Q and realignment of Taxiway B (as proposed in Refined Airfield Alternative 2) • Split north/south expansion of terminal facility and apron • Development of parking lots south of terminal ºProposed future parking structure south of terminal once demand calls for its construction (building height up to 60' allowed) ºNew parking spaces without structure: approximately 1,315 ºNew parking spaces with structure: approximately 2,330 ºOpportunities for premium parking rates, cell phone waiting lot, and/or valet services • Extension of Terminal Loop road to the south	• Terminal improvements in area mapped as a Moderate Sensitivity Zone for archaeological resources • May require archaeological monitoring during excavation activities
North Landside Alternatives	1	• 5.2 acres of FBO development parcels (capable of providing up to 226,500 square feet for terminal/ hangar/parking) • 1.4 acre parcel reserved for restaurant or future conference center • 112,000 square feet of new conventional hangar space • 50,625 square feet of new executive hangar space • Net increase of 112,140 square feet of conventional/ executive hangar space • 56 new T-hangar units (net increase of 24 units) • 15,600 square yards of airport-managed small aircraft transient ramp • 78,000 square yards of new FBO leasable ramp • 7 helicopter parking spaces • Airport administrative offices relocated to Ampersand complex office space • Maintenance yard relocated to facilities along Arnold Place • Existing maintenance facilities to be converted to leasable revenue support parcels • 4.2 acres of FBO development parcels (capable of providing up to 182,950 square feet for terminal/ hangar/parking) • 1.0 acre parcel reserved for restaurant or future conference center • 230,000 square feet of new conventional hangar space (net increase of 199,035 square feet) • 56 new T-hangar units (net increase of 24 units) • 81,150 square yards of new FBO leasable ramp • 11,800 square yards of airport-managed small aircraft transient ramp	• Proposed fuel farm expansion to occur in 100-year floodway. Future expansion or tank replacement will need to be constructed above base flood elevation. • Proposed conventional hangars along Fairview should be constructed outside of 100-year floodway
	2	• 8 helicopter parking spaces • Considers conversion of Runway 15L-33R to Taxiway Q • Maintenance yard relocated to land north of proposed Taxiway Q • Existing maintenance facilities to be converted to leasable revenue support parcels	



Exhibit 3B
REFINED ALTERNATIVES SUMMARY

The recommended development concept plan, as discussed in Section 2.2.2 and shown on Exhibit 2B, was chosen based on Federal Aviation Administration (FAA) design and safety guidance and criteria as well as environmental considerations and includes modified versions of the airfield and terminal area alternatives, and a revised north landside redevelopment alternative (see Exhibits 2C – 2F). The environmental effects of the recommended development concept plan are evaluated at a programmatic level in the various sections of Chapter Four of this Program EIR under the subheadings "Project-Specific Impacts" and "Regional (Cumulative) Impacts."

3.2 ALTERNATIVES INITIALLY CONSIDERED, BUT ELIMINATED

3.2.1 Demolition of Building Nos. 248 and 249

This alternative was originally recommended in the draft Master Plan and would have demolished existing structures located in the floodway of San Pedro Creek. The buildings in question (General Western Aero Corporation Hangars, Buildings Nos. 248 and 249) are not presently used and, due to their location within the floodway, are not suitable for most airport-related functions. However, based on an historical evaluation of the structures under the *National Environmental Policy Act* (NEPA) and CEQA, the structures are eligible to be listed on both the National Register of Historic Properties (NRHP) and the California Register of Historic Resources (CRHR) and are also eligible as City Landmarks for their architectural merits. Therefore, their demolition would result in significant impacts to historical resources under CEQA and this alternative was removed from consideration.

3.2.2 Demolition of Building Nos. 309 and 317

This alternative was originally recommended in the draft Master Plan. The buildings in question (World War [WW-II] Hangars Nos. 1 and 2, Buildings Nos. 309 and 317) are presently used as hangars, but would have been replaced by additional hangar development in other areas of the north side to improve access to and from the apron. However, based on an historical evaluation of Buildings 309 and 317 under CEQA, the structures are eligible to be listed as City Structures of Merit for their contributions to the development of the Airport and as two of the three only examples of their architectural type in the City of Santa Barbara (see also Section 3.2.3 below). Therefore, their demolition would result in significant impacts to historical resources under CEQA and this alternative was removed from consideration.

3.2.3 Demolition of Building No. 267

This alternative was originally recommended in the draft Master Plan and would have demolished a hangar (WW-II Hangar No. 3, Building No. 267) that is located within an area designated for future fixed base operator (FBO) development. The purpose of this alternative was to provide future FBO lessees with maximum flexibility for the redevelopment of the parcel. However, based on an historical evaluation of the structure under CEQA, Building No. 267 is

eligible to be listed as a City Structure of Merit for its contribution to the development of the Airport and as one of three remaining examples of its architectural type in the City of Santa Barbara (see also Section 3.2.2 above). Therefore, its demolition would result in significant impacts to historical resources under CEQA and this alternative was removed from consideration.

3.2.4 Perimeter Fence Improvements along Mesa Road

This alternative was originally recommended in the draft Master Plan and would have replaced two segments of approximately 1,120 linear feet and 1,280 linear feet of perimeter fencing along Mesa Road at the Airport's boundary with the University of California, Santa Barbara (UCSB). The fence would have been increased from approximately four feet in height to the Airport's normal eight-foot high chain link fencing.

The more westerly segment of existing fence is located within a wooded and scrub area. This area contains known nesting and roosting sites for the white-tailed kite, a State Fully Protected (FP) species. The more easterly segment is located in the Slough within, or adjacent to, habitat for the State endangered Belding's savannah sparrow. Both replacement fence projects have the potential to adversely affect vegetation, and thus wildlife, during construction; however, if done in an environmentally sensitive and responsible manner, no significant adverse impacts should occur. The City's Standard Conditions of Approval include avoidance of nesting birds and tree protection measures to be applied during construction activities.

In the long term, replacement of perimeter fence segments along Mesa Road would provide additional control over not only access to the Airport, but to the sensitive biological resources of the Slough. However, during the environmental scoping process for this EIR, the California Department of Fish and Wildlife (CDFW) and the Goleta Slough Management Committee (GSMC) both commented that the perimeter fence impedes the movement of wildlife through the area. Currently, the Airport's perimeter fence is a barrier to certain small and medium-sized mammals, such as coyotes, gray foxes, and bobcats, which might otherwise enter the Goleta Slough. Replacement of the fence with a higher chain link fence could exacerbate this situation. Therefore, it was determined that impacts related to higher chain link fencing that would restrict wildlife movement in and out of the Slough were potentially significant.

As mitigation, CDFW recommended that the existing fence be modified at key points to achieve a better balance within the Slough to support coyotes, gray foxes, and bobcats as key predators. This mitigation measure would need to be studied further by the Airport and FAA to ensure that such modifications did not hamper security and wildlife hazard management activities. The advisability of the requested mitigation program cannot be fully assessed until the results of the Airport's ongoing wildlife hazards assessment are known.

Therefore, this alternative, i.e., improvements to the perimeter fence along Mesa Road, was removed from consideration as part of this Master Plan. It was determined that it would be better

to reassess the situation in light of the findings of the Airport's ongoing wildlife hazard assessment. The removal of this alternative from consideration at this time was first vetted with the Transportation Security Administration and concurrence was received.

3.3 NO PROJECT ALTERNATIVE

The No Project Alternative essentially considers keeping the Airport in its present condition, rather than providing any type of expansion or improvement to the existing facilities (other than general maintenance projects). The primary result of this alternative would be an inability of the Airport to accommodate the projected aviation demands of the service area, thus, inhibiting the Airport's contribution to economic growth of the South Coast of Santa Barbara County and the local Santa Barbara/Goleta community.

The Airport Department is charged with developing aviation facilities necessary to meet the air transportation and economic development needs of its customers and partners. Aviation demand forecasts and analysis of facility requirements indicate a future need for improved facilities at Santa Barbara Airport related to growing population and economic conditions within the Airport's service area and growth within the aviation industry as a whole. Improvements recommended in the Facility Requirements chapter (Master Plan, Chapter Four) include: airfield improvements to mitigate taxiway "hot spots" and to improve overall operational safety; terminal facility improvements to meet projected enplanement demands including automobile parking capacity; and improvements to meet the needs of general aviation users such as expanded aircraft storage hangar capacity, fixed wing and helicopter parking, and the segregation of these facilities from commercial airline operations to improve operational safety and flow of the airfield.

The No Project Alternative would not support the private businesses that have made investments at Santa Barbara Airport. As these businesses grow, the Airport needs to accommodate the infrastructure needs associated with their growth. Each of the businesses on or adjacent to the Airport provides jobs for local residents, creates positive economic benefits for the community, and pays taxes for local government operations. To propose no further development at Santa Barbara Airport could adversely affect the long-term viability of the Airport, resulting in negative economic effects on the surrounding communities. The No Project Alternative is also inconsistent with the long-term goals of FAA and California Department of Transportation (Caltrans), Division of Aeronautics to enhance local and interstate commerce.

Chapters One and Four of the proposed Master Plan contain an inventory of existing conditions and facilities at the Airport as well as facility requirements needed to meet the aviation demand forecast by the FAA to occur over the next 20 years. **Exhibits 3C** and **3D** identify future short- and long-term facility needs at the Airport based on the facility requirements listed in Chapter Four of the Master Plan. Since the No Project Alternative would maintain existing Airport facilities without making any of the improvements recommended by the proposed Master Plan, the facility needs identified in the tables would not be met under this alternative.

In addition, certain aspects of the Master Plan are proposed to ameliorate existing environmental conditions. These issues would not be addressed by the No Project Alternative. The environmental effects of the No Project Alternative are discussed in the various sections of Chapter Four of this EIR under the subheading "Comparative Impacts of Alternatives."

3.4 ALTERNATIVE LOCATIONS

The Airport is located on 948 acres of a former military facility and has been in existence in some form since the 1940s. Approximately 548 acres of the property are developed with aeronautical uses or an associated Airport Industrial Area (225 acres). The Airport is classified under the National Plan of Integrated Airport Systems (NPIAS) as a small hub, primary commercial service airport with a reported ~~380,151~~ 316,511 total passenger enplanements (boardings) for ~~2011~~ 2015.[1] Capital improvements and financial investments at the Airport have been substantial.

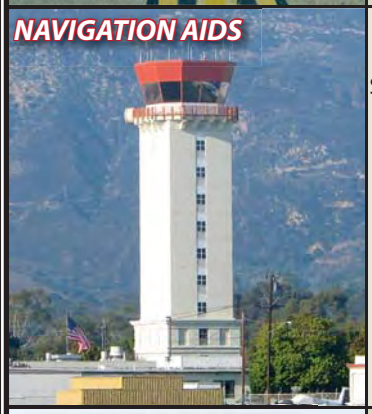
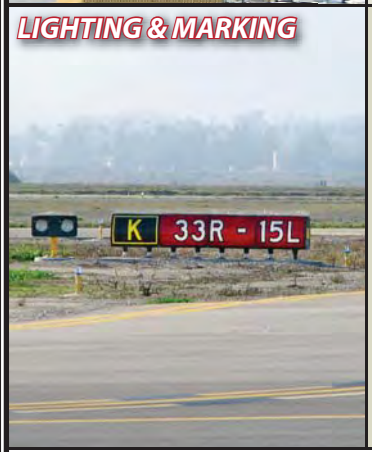
Alternative locations for the Airport would require a comprehensive study that is beyond the scope of this EIR. The proposed project is a Master Plan to accommodate minor redevelopment, safety improvements, and expansion of the existing Terminal to allow its continued safe and efficient functionality through a 20-year planning period. As discussed previously, Section 15126.6 (f)(3) of the CEQA Guidelines states, "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." Therefore, alternative locations have not been evaluated further in this EIR.

3.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Implementation of the proposed Master Plan could result in future impacts to potential wetlands and other resources of the Goleta Slough. Local Coastal Program (LCP) and General Plan amendments would be necessary, specifically for the recommended extension of Taxiway H to the Runway 7 threshold, the construction of associated connector taxiways, and the relocation of a glideslope antenna. These actions would occur in an area currently designated as Goleta Slough Natural Reserve and zoned as G-S-R, Goleta Slough Reserve. The Environmentally Superior Alternative would avoid impacts to biological resources in the Slough as well as policy inconsistencies with the Airport's LCP by not extending Taxiway H (**Exhibit 3E**).

Under the Environmentally Superior Alternative, not all of the safety goals of the proposed Master Plan, including the elimination of Taxiway Hot Spot #1, would be met. The alternative would also restrict the safety and efficiency of the Airport by not providing a complete parallel taxiway on the north side of Runway 7-25. (If a full-length parallel taxiway north of Runway 7-25 is provided, aircraft utilizing the north general aviation ramps would no longer have to cross the active primary runway to get to the Runway 7 threshold.)

[1] FAA Airports, Passenger Boarding (Enplanements) and All-Cargo Data for U.S. Airports (CY 2015 ACAIS). Available at: https://www.faa.gov/airports/planning_capacity/passenger_allcargo_stats/passenger/, accessed March 2017.

	EXISTING	SHORT TERM	LONG TERM
RUNWAYS 	**Runway 7-25** 6,052' x 150' 110,000# SWL 160,000# DWL 245,000# DTWL ARC C-III	**Runway 7-25** ARC D-III	**Runway 7-25** Same
	Runway 15R-33L 4,183' x 100' 48,000# SWL 63,000# DWL 100,000# DTWL ARC B-I (small airplane exclusive)	**Runway 15R-33L** Same	**Runway 15R-33L** Same
	Runway 15L-33R 4,179' x 75' 35,000# SWL 41,000# DWL 63,000# DTWL ARC B-I (small airplane exclusive)	**Runway 15L-33R** Same	**Runway 15L-33R** Same
TAXIWAYS 	4 Taxiway Hotspots	Take measures to mitigate taxiway hotspots	
	Runway 7-25 75' wide Full-length Parallel (south side)	**Runway 7-25** Full-length Parallel (north side)	**Runway 7-25** Same
	Runway 15R-33L 50' wide Partial Parallel (west side)	**Runway 15R-33L** Same	**Runway 15R-33L** Same
	Runway 15L-33R 50' wide Full-length Parallel (east side)	**Runway 15L-33R** Same	**Runway 15L-33R** Same
NAVIGATION AIDS 	ATCT/TRACON, ASOS, Lighted Wind Indicator, Segmented Circle, VOR, GPS, Beacon	Same	Same
	Runway 7-25 CAT-I ILS Approach (7) GPS LPV/VNAV/LNAV Approach (7) GPS or VOR Approach (25) PAPI-4 (25) MALSR (7)	**Runway 7-25** Same	**Runway 7-25** Same
	Runway 15R-33L Visual Runway	**Runway 15R-33L** PAPI-4	**Runway 15R-33L** Same
	Runway 15L-33R Visual Runway	**Runway 15L-33R** Same	**Runway 15L-33R** Same
LIGHTING & MARKING 	Basic Taxiway Markings Pilot Controlled Lighting Lighted Airfield Signage MITL	Same	Same
	Runway 7-25 Precision Markings HIRL REIL (25) Distance Remaining Signage	**Runway 7-25** Same	**Runway 7-25** Same
	Runway 15R-33L Basic Marking MIRL	**Runway 15R-33L** Same	**Runway 15R-33L** Same
	Runway 15L-33R Basic Marking No Runway Edge Lighting System	**Runway 15L-33R** Same	**Runway 15L-33R** Same

KEY

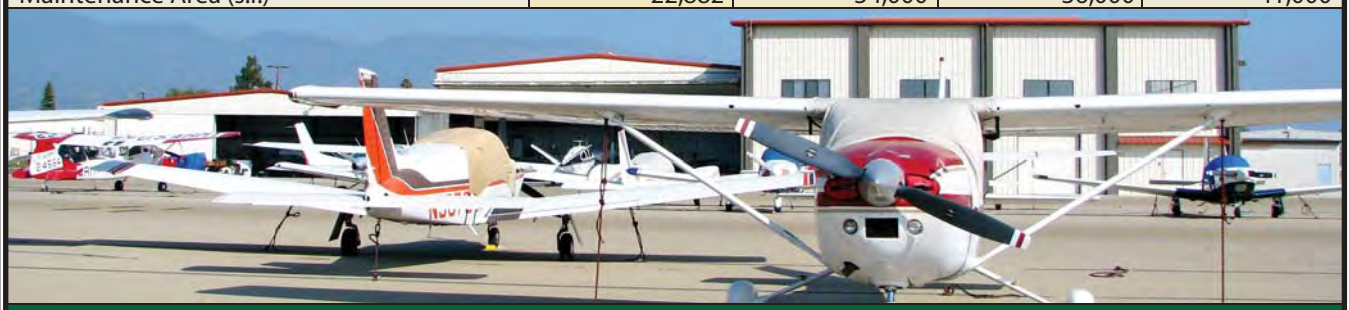
ARC - Airport Reference Code
ASOS - Automated Surface Observation System
ATCT - Airport Traffic Control Tower
CAT - Category
DWL - Dual Wheel Loading
DTWL - Dual Tandem Wheel Loading
GPS - Global Positioning System
HIRL - High Intensity Runway Edge Lighting
ILS - Instrument Landing System
LNAV - Lateral Navigation
LPV - Localizer Performance with Vertical Guidance
MALSR - Medium-Intensity Approach Lighting System with Runway Alignment Indicator Lights
MIRL - Medium Intensity Runway Edge Lighting
MITL - Medium Intensity Taxiway Lighting
PAPI - Precision Approach Path Indicator
SWL - Single Wheel Loading
REIL - Runway End Identifier Lighting
TRACON - Terminal Radar Approach Control
VNAV - Vertical Navigation
VOR - Very High Frequency Omni-Directional Range



	Available	Short Term	Intermediate Term	Long Term
GENERAL AVIATION TERMINAL AREA REQUIREMENTS				
General Aviation Services Facility Area (s.f.)	--	8,900	9,500	10,500

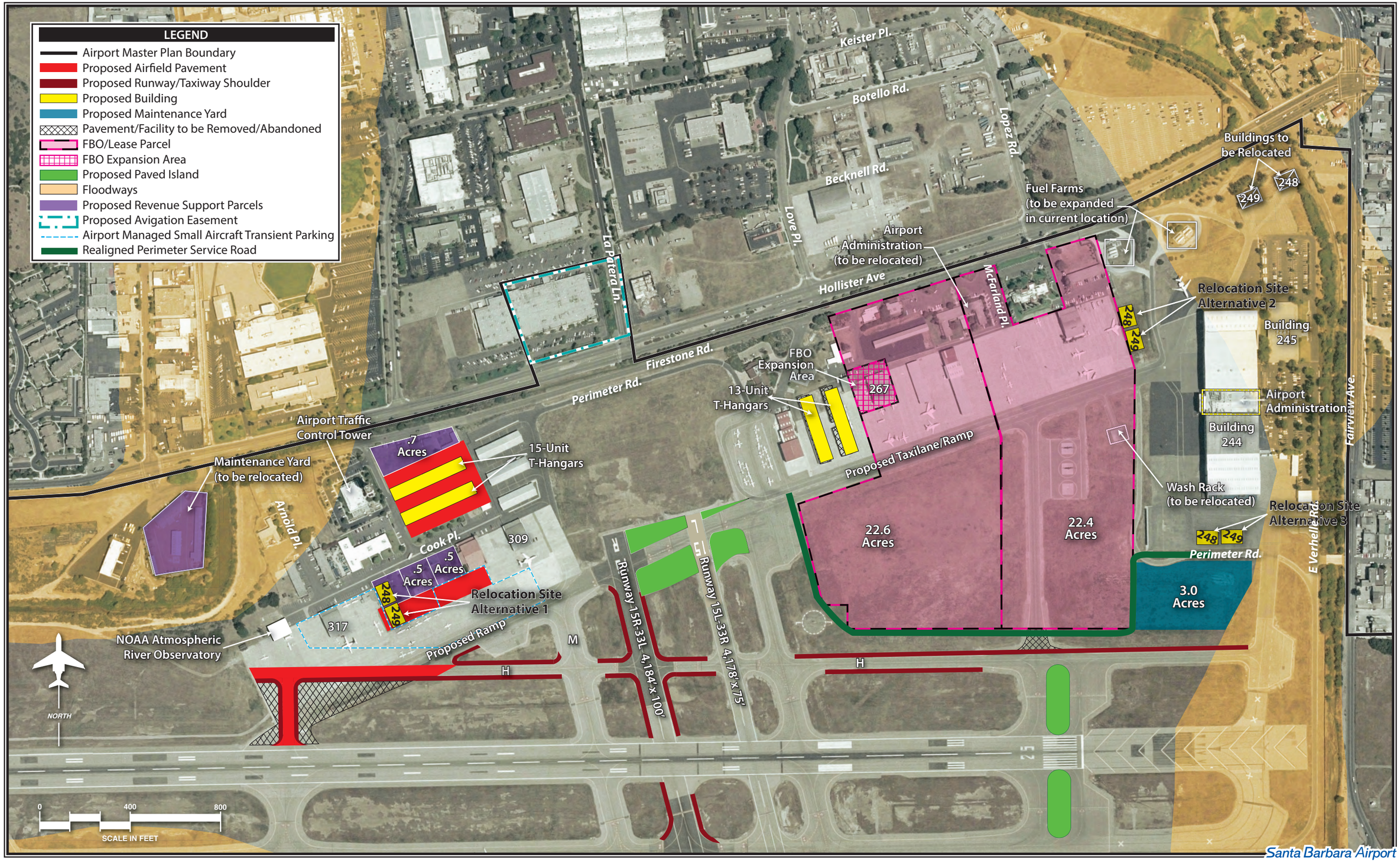


AIRCRAFT HANGAR REQUIREMENTS				
T-Hangar / Port-A-Port Area (s.f.)	85,689	102,000	106,000	113,000
Conventional / Executive Hangar Area (s.f.)	79,917	99,000	150,000	239,000
Maintenance Area (s.f.)	22,882	34,000	36,000	41,000



AIRCRAFT PARKING APRON REQUIREMENTS				
Single, Multi-engine Transient Positions		20	21	21
Apron Area (s.y.)	--	12,200	12,400	12,400
Transient Turbine Positions		12	14	17
Apron Area (s.y.)	--	19,100	22,100	27,700
Locally-Based Single, Multi-engine Positions		76	73	76
Apron Area (s.y.)	--	45,700	43,800	45,700
Locally-Based Turbine Positions		17	20	25
Apron Area (s.y.)	--	27,400	31,400	39,200
Helicopter Positions		7	8	10
Apron Area (s.y.)	--	4,400	5,000	6,300
Total Parking Positions	152	132	136	149
Total Apron Area (s.y.)	156,500	108,800	114,700	131,300

SUPPORT FACILITIES				
	Fuel Storage 100LL 24,000 gal. Jet A 84,000 gal. Partial Perimeter Security Fencing ARFF Index C Equipment Airport Maintenance Complex Paved Perimeter Service Road Aircraft Wash Rack	Fuel Storage 100LL 9,800 gal. Jet A 117,200 gal. Full Perimeter Security Fencing	Fuel Storage 100LL 10,300 gal. Jet A 124,000 gal.	Fuel Storage 100LL 11,500 gal. Jet A 138,200 gal.



Santa Barbara Airport

Exhibit 3E
ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The environmental effects of the Environmentally Superior Alternative are discussed in the various sections of Chapter Four of this EIR under the subheading “Comparative Impacts of Alternatives.”

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Chapter Four
ENVIRONMENTAL CONDITIONS, IMPACTS AND MITIGATION

The scope of the analysis in this chapter was determined based on an Initial Study completed on the Airport's proposed Master Plan in June 2014, and an Environmental Scoping hearing conducted on July 24, 2014, at a properly noticed City of Santa Barbara (City) Planning Commission meeting. Per the *California Environmental Quality Act* (CEQA) Guidelines, §15143, an Environmental Impact Report (EIR) should focus on the significant effects on the environment "with emphasis in proportion to their severity and probability of occurrence. Effects dismissed in an Initial Study as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless the Lead Agency subsequently receives information inconsistent with the finding in the Initial Study."

The proposed Master Plan's Initial Study is incorporated by reference and is included in the Draft Program EIR in Appendix A. Based on the Initial Study and the scoping hearing, the following areas of potential impact have been identified for further analysis:

- Air Quality/Greenhouse Gas Emissions
- Biological Resources
- Cultural Resources
- Geology and Soils/Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Public Utilities (Solid Waste Disposal)
- Transportation/Traffic

The above potential impacts are addressed in the following sections of this chapter in the order they were presented in the Initial Study. Where appropriate, environmental and regulatory setting information has been summarized from the Initial Study, the City's Final Program EIR for the City's General Plan update (Final General Plan EIR), and from an Environmental Overview completed as part of the Airport's proposed Master Plan (Master Plan, Appendix B).

The following impact categories have been used in the assessment of potential impacts based on the City's system of classifying impact significance levels:

- Class I, Significant Environmental Impact: An impact to the environment that remains significant even after mitigation measures are applied;
- Class II, Less than Significant Impact with Mitigation: A potentially significant impact that can be avoided or reduced to an insignificant level with mitigation incorporated;
- Class III, Less than Significant Impact; and
- Class IV, Beneficial Impact.

Impact level determinations have been made using City impact significance guidelines and criteria for each impact topic and are specified by resource category in each of the following sections.

~~The following sections of the Draft Environmental Impact Report (EIR) have been revised and are included in this Recirculated Draft EIR:~~

- ~~Section 4.1, Air Quality/Greenhouse Gas Emissions~~
- ~~Section 4.2, Biological Resources~~
- ~~Section 4.5, Hydrology and Water Quality~~
- ~~Section 4.6, Land Use and Planning~~
- ~~Section 4.8, Transportation/Traffic~~

~~All other sections of Chapter Four remain unchanged and are not repeated within this document.~~

4.1 AIR QUALITY/GREENHOUSE GAS EMISSIONS

4.1.1 Environmental and Regulatory Setting

The Santa Barbara region is located in the South Central Coast air basin, which is comprised of San Luis Obispo, Santa Barbara, and Ventura counties. Geographic features that influence the quality of air in the region include the Santa Barbara Channel, located in the Pacific Ocean to the south, and the Santa Ynez Mountains, which have elevations up to 4,707 feet above mean sea level (msl) and trend east-west on the north side of the region. The climate in Santa Barbara is characterized as a Mediterranean climate with warm summers, mild winters, and relatively dry

weather. Inversion layers that can trap both the cooler air and air pollutants often occur. In addition, wind patterns that link the South Central Coast air basin with the Los Angeles area (the South Coast air basin) occasionally blow pollutants located offshore back inland (City of Santa Barbara 2010).

Greenhouse gases (GHG) are those that trap heat in the earth's atmosphere. Greenhouse gases such as water vapor (H_2O), carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and ozone (O_3) are both naturally occurring and anthropogenic (man-made). Research has shown that there is a direct link between fuel combustion and GHG emissions and that CO_2 accounts for 85 percent of GHG emissions within the United States (U.S.).

California is a substantial contributor of GHG (2nd largest contributor in the U.S. and the 16th largest in the world), with transportation and electricity generation representing the largest sources (41 and 22 percent, respectively). In Santa Barbara, direct sources of GHGs are on-road vehicles, natural gas consumption, and off-road vehicles and equipment. Indirect sources are electricity consumption (power generation), landfill decomposition (methane releases), and State Water Project transport (electricity use).

The scientific community is developing areas of further study to enable it to more precisely estimate aviation's effects on the global atmosphere. At an airport, sources that require fuel or power are the primary sources of GHG generation. Aircraft jet engines, like many other vehicle engines, produce CO_2, H_20, nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), volatile organic compounds (VOCs), particulates, and other trace compounds. The Federal Aviation Administration (FAA) is currently leading or participating in several efforts intended to clarify the role that commercial aviation plays in greenhouse gases and climate change.

A related concern to global warming is sea level rise. Per State Executive Order #S-03-05, California produces periodic scientific assessments on the potential impacts of climate change in California. The most recent assessment was published in 2012 (Publication #CEC-500-2012-007) and includes sea level rise projections under two emission scenarios. According to this publication, sea levels along the California coast could be 10-18 inches higher in 2050 than in 2000, depending on the emission scenario (CA.gov 2014). The *Goleta Slough Area Sea Level Rise and Management Plan* (Slough Management Plan) identifies habitat and infrastructure at risk from rising sea water level in the Goleta Slough (Slough) and is incorporated by reference into this Recirculated Draft Program EIR. It can be reviewed in its entirety at http://www.goletaslough.org/committee/2016-goleta-slough-management-plan/ (GSMC 2015).

Regulatory Setting

Federal

The U.S. Environmental Protection Agency (EPA) under the Federal *Clean Air Act* has established National Ambient Air Quality Standards (NAAQS) based on health risks for six pollutants (**Exhibit 4A**): CO; nitrogen dioxide (NO_2); sulfur dioxide (SO_2); lead (Pb); O_3; and two sizes of particulate

matter (PM), measuring 10 micrometers or less in diameter (PM_{10}) and 2.5 micrometers or less in diameter ($PM_{2.5}$). An area with ambient air concentrations exceeding the NAAQS for a criteria pollutant is said to be a nonattainment area for the pollutant's NAAQS, while an area where ambient concentrations are below the NAAQS is considered an attainment area. As of June 17, 2016, Santa Barbara County (County) was in attainment for each of the NAAQS (U.S. EPA 2016). Federal regulations under the *Clean Air Act* regarding the reduction of GHG emissions have yet to be approved.

State

The State of California (*California Clean Air Act of 1988*) has promulgated ambient air quality standards that are more stringent than the NAAQS. The California Ambient Air Quality Standards (CAAQS) apply to numerous potential pollutants (**Exhibit 4A**), including O_3, CO, SO_2, NO_2, $PM_{2.5}$, PM_{10}, and Pb. As of December 2015, Santa Barbara County was in nonattainment for the following State ambient air quality standards: O_3 and PM_{10}. The County was unclassified for $PM_{2.5}$ and Visibility Inducing Particles (CARB 2015).

In addition, California has a number of regulations regarding GHGs and climate change. California Assembly Bill (A.B.) 32 (*Global Warming Solutions Act of 2006*) required the California Air Resources Board (CARB) to create a program to reduce statewide GHGs to 1990 levels by the year 2020; Senate Bill (S.B.) 375 (*Sustainable Communities and Climate Protection Act of 2008*) required regional coordination of transportation and land use planning throughout the State to reduce vehicle GHG emissions. For Santa Barbara County, CARB established targets of not to exceed 2005 per capita vehicle emissions in the years 2020 and 2035. State S.B. 97 (enacted in 2007 and amended in 2010) required that project environmental reviews under CEQA include analysis of GHG impacts and mitigation, and established that public agencies may provide for a communitywide GHG emissions mitigation program through an adopted Climate Action Plan.

Regional/Local

The Santa Barbara County Air Pollution Control District (APCD) is the local agency that implements State and Federal air quality regulations in Santa Barbara. Stationary sources (e.g., businesses, utilities, government agencies, and universities) need an APCD permit before constructing, changing, replacing, or operating any equipment or process which may cause air pollution. This includes equipment designed to reduce air pollution.

There are two permits required: Authority to Construct (ATC) is required before construction begins; and Permit to Operate (PTO) is necessary after construction and demonstration of compliance. In certain cases, the APCD can issue a combined ATC/PTO permit. Permits are also required if an existing business that causes air pollution transfers ownership, relocates, or otherwise changes their operations (SBAPCD 2014).

The APCD has also issued several notifications and requirements regarding toxic air emissions generated from activities such as gasoline dispensing, dry cleaning, freeways, manufacturing, etc., that may require projects with these components to mitigate or redesign features of the

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)[8]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM10)[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
Fine Particulate Matter (PM2.5)[9]	24 Hour	—	—	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m^3)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	—	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[11]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[11]	—	
Lead[12,13]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m^3		
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	**No National Standards**		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

Source: California Air Resources Board 2016

Santa Barbara Airport

Exhibit 4A CALIFORNIA AND FEDERAL AMBIENT AIR QUALITY STANDARDS

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7. Reference method as described by the U.S. EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the U.S. EPA.

8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM10 standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

For more information please call ARB-PIO at (916) 322-2990 **California Air Resources Board (5/4/16)**

project to avoid excessive health risks. Additionally, the APCD requires submittal of an asbestos notification form for each regulated structure that is proposed to be demolished or renovated.

4.1.2 Applicable Plans and Policies

Regional

The APCD, in coordination with the Santa Barbara County Association of Governments (SBCAG), has completed its *2013 Clean Air Plan* (CAP) (SBCAPCD & SBCAG 2015), which is required to be updated every three years by the Federal *Clean Air Act* amendments (Title 42 United States Code [USC] §§ 7401 et seq.) and the *California Clean Air Act of 1988*. The 2013 CAP reports on air quality monitoring data, provides an emissions inventory, identifies trends in ozone precursors, NO_x and reactive organic compounds (ROCs), using a 2008 baseline condition, and re-evaluates previous emission control measures to attain the State 8-hour ozone standard. In the 2013 revision, the CAP continues to show that marine shipping will be the primary source of NO_x in the County. The CAP also predicts that NO_x and ROC from aircraft within the County will peak by 2020 and then decrease slightly by 2030 (2013 CAP, Table 3-3, Emissions by Source Category).

Local

The City of Santa Barbara (City), as part of its General Plan, assumed "moderate growth" at the Airport and continued build-out of the *Santa Barbara Airport Industrial Area Specific Plan* (SP-6 Plan) (City of Santa Barbara 2010, Section 4 – EIR Growth and Policy Assumptions). There are numerous policies and programs incorporated into the General Plan that address energy conservation, and thus, GHG emission reduction. Some of these policies, such as ER5 - Energy Efficient Buildings, might be applicable to development at the Airport.

A citywide *Climate Action Plan* (Climate Plan) was adopted in September 2012 in response to directives of the City General Plan and State Legislature (A.B. 32, S.B. 375, and S.B. 97). The Climate Plan identifies an inventory and forecasts of CO and other GHG emissions generated by the Santa Barbara community that contribute to accelerated global climate change. Strategies to reduce carbon emissions are identified in the areas of energy, travel and land use, vegetation, waste reduction, and water conservation. The Climate Plan also identifies potential climate changes in Santa Barbara, and strategies to begin planning for adaptation to climate change effects.

Past, present, and forecasted future citywide GHGs were analyzed in the Climate Plan (and associated Addendum to the Final General Plan EIR) in comparison to the State and City GHG emission targets for overall emission levels in the year 2020 (1990 emission levels), and vehicle-related emissions in 2020 and 2035 (2005 emission levels). The analysis demonstrates that citywide emissions are decreasing. With continued implementation of existing State and City legislative measures, citywide emissions associated with growth under the General Plan would meet and surpass these State and City emissions targets. Additional Climate Plan measures would further

reduce citywide emissions. The Climate Plan constitutes a citywide mitigation program for GHGs in accordance with S.B. 97.

In addition, the City has prepared a *Greenhouse Gas (GHG) Inventory and Carbon Footprint Reduction Plan for Santa Barbara Airport* (2007). Carbon footprint reduction recommendations for the Airport include the following:

- Prepare benefit/cost analyses of alternative GHG emission reduction measures;
- Convert diesel-powered preconditioned air units to electric power;
- Convert gasoline- and diesel-powered ground service equipment (GSE) to electric power;
- Install solar panels at the long-term parking lot; and
- Evaluate use of fuel cells at nearby locations.

4.1.3 Impact Evaluation Methodology and Significance Criteria

Based on CEQA significance criteria adopted by the City, a project may create a significant air quality impact from the following:

- Exceeding an APCD pollutant threshold; inconsistency with APCD regulations; or exceeding population forecasts in the adopted County CAP;
- Exposing sensitive receptors, such as children, the elderly or sick people, to substantial pollutant concentrations;
- Substantial unmitigated nuisance dust during earthwork or construction operations; and
- Creation of nuisance odors inconsistent with APCD regulations.

Long-Term (Operational) Impact Guidelines

The City of Santa Barbara uses the APCD thresholds of significance for evaluating air quality impacts. The APCD has determined that a proposed project will not have a significant air quality impact on the environment if operation of the project will:

- Emit (from all project sources, both stationary and mobile) less than 240 pounds per day for reactive organic compounds (ROC) and NO_x, and 80 pounds per day for PM_{10};
- Emit less than 25 pounds per day of ROC or NO_x from motor vehicle trips only;

- Not cause a violation of any California or National Ambient Air Quality Standard (except ozone);

- Not exceed the APCD health risks public notification thresholds adopted by the APCD Board; and

- Be consistent with the adopted Federal and State air quality plans for Santa Barbara.

Substantial long-term project emissions could potentially stem from stationary sources which may require permits from the APCD and from motor vehicles associated with the project and from mobile sources. Examples of stationary emission sources that require permits from the APCD include gas stations, auto body shops, diesel generators, boilers and large water heaters, dry cleaners, oil and gas production and processing facilities, and waste water treatment facilities.

Construction Impact Guidelines

Projects involving grading, paving, construction, and landscaping activities may cause localized nuisance dust impacts and increased PM_{10}. Substantial dust-related impacts may be potentially significant, but are generally considered mitigable with the application of standard dust control mitigation measures. Standard dust mitigation measures are applied to projects with either significant or less than significant effects.

Exhaust from construction equipment also contributes to air pollution. Quantitative thresholds of significance are not currently in place for short-term or construction emissions for non-stationary sources. However, the APCD uses the threshold for stationary sources as a guideline for determining the impacts of construction emissions for non-stationary sources. The stationary source threshold states that a project's combined emissions from all construction equipment cannot exceed 25 tons of any criteria pollutant except CO within a 12-month period. Standard equipment exhaust mitigation measures are recommended by the APCD for projects with either significant or less than significant effects.

Cumulative Impacts and Consistency with Clean Air Plan

If the project-specific impact exceeds the ozone precursor significance threshold, it is also assumed to have a considerable contribution to cumulative impacts. When a project is not accounted for in the most recent CAP growth projections, then the project's impact may also be considered to have a considerable contribution to cumulative air quality impacts. SBCAG and CARB on-road emissions forecasts are used as a basis for vehicle emission forecasting. If a project provides for increased population growth beyond that forecasted in the most recently adopted CAP, or if the project does not incorporate appropriate air quality mitigation and control measures, or is inconsistent with APCD rules and regulations, then the project may be found inconsistent with the CAP and may have a significant impact on air quality.

Global Climate Change

In accordance with Appendix G of the CEQA Guidelines, a project may have a significant impact related to global climate change if it would generate substantial GHG emissions either directly or indirectly, or would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs.

Based on the analysis within the City's Climate Plan and the General Plan Program EIR Addendum, projects within the growth assumptions of the General Plan and that meet applicable City regulations for GHG emission reductions:

(1) would be consistent with the Climate Plan and associated policies and regulations for reducing GHG emissions;

(2) would be within the citywide GHG impact assessment in the Climate Plan and associated General Plan Program EIR Addendum, which found that total citywide GHG emissions and per capita vehicle emissions would meet State and City reduction targets and would not constitute a significant environmental impact; and

(3) would be within the City Council's Climate Plan adoption finding that no significant GHG impacts would result from General Plan build-out of the City.

4.1.4 Project-Specific Impacts

Long-Term (Operational) Impacts

Impact AQ-1: As part of the proposed Master Plan's Initial Study, an Airport operational emissions inventory for existing conditions (2011), the short-term forecast (2017), and the long-term forecast (2032) was calculated using EDMS, Version 5.1.3 (Appendix B of the Draft Program EIR). These emission projections included emissions from aircraft, automobiles, ground support equipment, and fueling operations. The change in future emissions due to anticipated airport operations, when compared to the existing conditions, did not exceed APCD's significance thresholds (**Tables 4A** and **4B**).

TABLE 4A **Short-Term Operational Emissions Inventory[1]** **Santa Barbara Airport**	**Operational Emissions (pounds per day)**		
	VOC[2]	**NO_x**	**PM_{10}**
2011 (Baseline Condition, 108,285 operations)	240.2	268.1	7.2
2017 (Forecast, 112,990 operations)	247.5	269.7	7.0
Difference	7.3	1.6	- 0.2
APCD Threshold for Operational Emissions Above Baseline Condition (pounds per day)	240	240	80
Emissions Difference Exceeds Threshold?	No	No	No
Automobile Emissions			
2011	3.3	2.9	0.1
2017	2.8	2.0	0.1
Difference	- 0.5	- 0.9	0
APCD Threshold for Operations (pounds per day)	25	25	- [3]
Yearly Emissions Exceeds Threshold?	No	No	- [3]

Source: Coffman Associates' technical analysis (see Appendix B of the Draft Program EIR).

[1] Includes emissions from aircraft, automobiles, ground support equipment, and fueling operations based on 2011 Santa Barbara Airport Master Plan operations estimates.
[2] Also referred to as reactive organic compounds (ROCs).
[3] APCD has not adopted a PM_{10} threshold for automobile emissions.

TABLE 4B **Long-Term Operational Emissions Inventory[1]** **Santa Barbara Airport**	**Operational Emissions (pounds per day)**		
	VOC[2]	**NO_x**	**PM_{10}**
2011 (Baseline Condition, 108,285 operations)	240.2	268.1	7.2
2032 (Forecast, 133,150 operations)	321.0	377.0	8.9
Difference	80.8	108.9	1.7
APCD Threshold for Operational Emissions Above Baseline Condition (pounds per day)	240	240	80
Emissions Difference Exceeds Threshold?	No	No	No
Automobile Emissions			
2011	3.3	2.9	0.1
2032	2.5	1.3	0.1
Difference	- 0.8	- 1.6	0.0
APCD Threshold for Operations (pounds per day)	25	25	- [3]
Yearly Emissions Exceeds Threshold?	No	No	- [3]

Source: Coffman Associates' technical analysis (see Appendix B of the Draft Program EIR).

[1] Includes emissions from aircraft, automobiles, ground support equipment, and fueling operations based on 2011 Santa Barbara Airport Master Plan operations estimates.
[2] Also referred to as reactive organic compounds (ROCs).
[3] APCD has not adopted a PM_{10} threshold for automobile emissions.

In addition, the proposed Master Plan is not responsible for the aviation growth expected to occur at the Airport over the next 20 years. This growth is driven primarily by economic and population-based factors and was included in the economic and population projections for the City in the City's Final General Plan EIR. Rather, the Master Plan's purpose is to provide strategies for safety improvements and redevelopment recommendations that would allow the growth anticipated at the Airport to occur in a safe, efficient, and environmentally-sensitive manner. Therefore, the proposed Master Plan is consistent with adopted population forecasts.

The City has also adopted CEQA thresholds related to the exposure of sensitive receptors, such as children, the elderly, or sick people, to substantial pollutant concentrations and the creation of nuisance odors inconsistent with APCD regulations. The closest sensitive receptors to the areas of the Airport that might be affected by additional long-term emissions or nuisance odors would be residents located north Hollister Avenue off of Willow Springs Lane. This residential area is approximately 1,000 feet from the part of the airfield that could be developed with the recommended Taxiway H Airfield Safety Project as well as the closest recommended north side redevelopment. At the closest residence, located almost 0.2 mile away, pollutant concentrations or odors would not be substantial.

The proposed Master Plan does include recommendations for several activities that would require a permit from the APCD. Among these are the expansion of the Airport's fuel farm facilities and the removal of buildings that could contain asbestos.

Result AQ-1: **Airport emissions would be below the APCD threshold of 240 pounds per day of ROC and NO_x and 80 pounds per day of PM_{10} (stationary ~~or~~ and mobile sources), and 25 pounds per day (for automobile emissions only), in both the short- and long-term Master Plan build out scenarios (refer to Tables 4A and 4B). In addition, the Airport's forecast growth in the proposed Master Plan has been included in the adopted City General Plan and EIR. Therefore, the anticipated growth is consistent with applicable APCD and City planning documents, including the 2013 CAP, and the City's Climate Plan.**

Due to the intervening distance (approximately 1,000 feet) between the nearest residential neighborhood and potential development areas of the Airport, no substantial pollutant concentrations or nuisance odors would affect sensitive receptors as a result of the proposed Master Plan. Certain specific activities at the Airport (as discussed above) may require a permit from the APCD. As long as all conditions of the required permit are implemented, project-specific operational emissions would have a Class III, Less than Significant Impact on long-term air quality.

Construction and/or Demolition Impacts

Impact AQ-2: Construction of recommended Master Plan projects would result in emissions of pollutants due to grading, fumes, and vehicle exhaust. Diesel- and gasoline-powered construction equipment emits particulate matter, NO_x, and ROC. In order for emissions from construction equipment to be considered a potentially significant environmental impact, combined emissions from all construction equipment would need to exceed 25 tons of any pollutant (except CO) within a 12-month period. Therefore, this comparative analysis must occur as specific development projects are proposed and the construction schedule and equipment inventories can be estimated.

As discussed previously, the City has also adopted CEQA thresholds related to the exposure of sensitive receptors, such as children, the elderly, or sick people, to substantial pollutant concentrations and the creation of nuisance odors inconsistent with APCD regulations. The City's CEQA Guidance criteria also state that substantial unmitigated nuisance dust during earthwork or construction operations should not occur. At the closest residence, located almost 0.2 mile away, pollutant concentrations or odors related to construction equipment or activities would not be substantial. Dust, however, can migrate over considerable distances during windy conditions.

Result AQ-2: **Air quality and dust control is addressed in the City's Standard Conditions of Approval (see Initial Study, Appendix A of the Draft Program EIR, Exhibit 2), and is required by City Building Code provisions (Santa Barbara Municipal Code [SBMC] section 22.04.020 J112, Dust Control) and would be adhered to through all grading, hauling, and construction activities related to the Airport. In addition, as a Program EIR, this document includes programmatic measures intended to fully mitigate potential construction impacts of the proposed Master Plan to a less than significant level (see Section 4.1.7 below). Thus, construction- or demolition-related air quality impacts would be Class II, Less than Significant Impact with Mitigation.**

4.1.5 Regional (Cumulative) Impacts

Cumulative Impacts and Consistency with Clean Air Plan

Impact AQ-3: As stated previously in Sections 4.1.2 and 4.1.4, the City of Santa Barbara, as part of its General Plan, assumed "moderate growth" at the Airport and continued build-out of the SP-6 Plan (City of Santa Barbara 2010, Section 4 – EIR Growth and Policy Assumptions).

The proposed project is consistent with the City's General Plan land use designation and the General Plan "moderate growth" assumptions. Master Plan-

recommended future projects would be subject to existing regulations, design guidelines, and the Airport's carbon footprint reduction recommendations, as appropriate, to reduce GHG emissions in the areas of energy efficiency and green building, renewable energy, travel and land use, vegetation, waste management, and water conservation.

Result AQ-3: **The proposed Master Plan is consistent with the 2013 CAP. Therefore, cumulative impacts to regional air quality would be Class III, Less than Significant Impact.**

Global Climate Change

Impact AQ-4: As discussed in the Initial Study, sources of direct CO and other GHG emissions that could result from the proposed Master Plan include project-related traffic, natural gas use, and landscaping/maintenance equipment. Indirect emissions are associated with power generation for electricity consumption; electricity and travel associated with consumer product production, transport, and use; solid waste disposal/decomposition; and potable water delivery. The Initial Study estimated that operational GHG emissions at the Airport could increase from 17,699 MT CO_2e in 2011 to 19,043 MT CO_2e in 2017, an increase of 1,344 MT CO_2e.[1] For the long-term scenario, it is estimated that operational greenhouse gas emissions could increase from 17,699 MT CO_2e (2011 baseline) to 26,753 MT CO_2e with Master Plan buildout (2032), an increase of 9,054 MT CO_2e generation (see Appendix B of the Draft Program EIR for calculations).

The increases during the time horizons analyzed represent an incremental contribution to citywide emissions that have already been addressed in the City's General Plan EIR; no new impacts would result from the project. The City's Climate Plan constitutes a citywide mitigation program for GHGs in accordance with S.B. 97. Projects recommended in the proposed Master Plan would be part of the citywide emissions identified in the Climate Plan and General Plan Program EIR Addendum, which were determined to comply with State and City GHG emission reduction targets. For example, new public buildings at the Airport will pursue LEED (Leadership in Energy and Environmental Design) Silver[2] standards per City Council direction. Commercial construction will be designed to accommodate solar roof panels consistent with the City's General Plan.

[1] GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalent" (CO_2E). The CO_2E for a gas is derived by multiplying the mass of the gas by the associated global warming potential (GWP) (i.e., potential of a gas or aerosol to trap heat in the atmosphere), such that MT CO_2E = (metric tons of a GHG) x (GWP of the GHG). For example, the GWP for CH_4 is 21.

[2] Projects pursuing LEED certification earn points across several areas that address sustainability issues. Based on the number of points achieved, a project then receives one of four LEED rating levels: Certified, Silver, Gold and Platinum.

Result AQ-4: **The proposed Master Plan buildout is ~~consistent with~~part of the growth assumptions used in the City's General Plan and adopted Climate Plan. Therefore, Master Plan contribution to cumulative impacts to GHG emission goals for the region would be Class III, Less than Significant Impact.**

4.1.6 Comparative Impacts of Alternatives

No Project Alternative

The Airport is likely to experience moderate growth, as predicted by the City and FAA, whether or not the proposed Master Plan is implemented. Therefore, long-term (operational) and regional (cumulative) impacts related to air quality and GHG emissions of the No Project alternative would be the same as those expected to occur due to the proposed project. Both are expected to have no new significant impact since this growth was included in the City's General Plan and Climate Plan as well as the APCD's adopted and updated CAPs and associated environmental review.

The No Project alternative would have less impact to air quality due to less construction activities related to the Airport since only general maintenance projects would occur. The City's Standard Conditions of Approval for dust control and other construction-related emissions would still apply, however, as well as any necessary permit conditions of the APCD. In addition, mitigation proposed in Section 4.1.7 should still be applied to any maintenance projects with a potential to reach the City and APCD's emission thresholds.

Environmentally Superior Alternative

Similar to the proposed project and the No Project alternative, the Airport is likely to experience moderate growth, as predicted by the City and FAA, under the Environmentally Superior alternative. Therefore, long-term (operational) and regional (cumulative) impacts related to air quality and GHG emissions of this alternative would also be the same as those expected to occur due to the proposed project. Both are expected to have no new significant impact since this growth was included in the City's General Plan and Climate Plan as well as the APCD's adopted and updated CAPs and associated environmental review.

The Environmentally Superior alternative would have less impact to air quality due to construction activities related to the Airport since some of the projects that could occur under the proposed project would not occur under this alternative. For the remaining development under this alternative, however, the City's Standard Conditions of Approval for dust control and other construction-related emissions would still apply, as well as any necessary permit conditions of the APCD. In addition, mitigation proposed in Section 4.1.7 should still be applied to any construction or redevelopment with a potential to reach the City and APCD's emission thresholds.

4.1.7 Mitigation Measures

The City's Standard Conditions of Approval Applicable to Project for dust control and other construction-related emissions will be applied to all recommended projects under the proposed Master Plan, as appropriate. Other specific permit conditions may be applied to individual projects by the APCD.

Mitigation Measure for Air Quality Impact AQ-2

The following programmatic measure will be incorporated into the Mitigation Monitoring and Reporting Plan (Chapter Seven) for the proposed Master Plan. This measure will reduce potential air quality impacts (construction-related) of the proposed Master Plan to a less than significant level.

AQ/mm-1: **As a condition of approval, all construction and/or building removal projects occurring under the proposed Master Plan shall be required to estimate said project's combined emissions from all construction equipment to ensure that the project would not exceed 25 tons of any criteria pollutant except CO within a 12-month period. Standard equipment exhaust mitigation measures recommended by the APCD for such projects shall be implemented, as appropriate.**

4.2 BIOLOGICAL RESOURCES

4.2.1 Environmental and Regulatory Setting

The Airport is located on a coastal plain along an east-west trending segment of the southern California coastline. The majority of the Airport is located within the historic boundaries of Goleta Slough, a coastal wetland that is one of the few remaining saltmarsh habitats in California and the only large area within the City with tidal-influenced creeks and salt water or brackish water marsh (Final General Plan EIR, p. 7-7). Two major creeks, Tecolotito and Carneros Creeks, traverse Airport property while San Pedro Creek forms part of the Airport's eastern border. Las Vegas Creek is also present north of Hollister Avenue where it crosses Airport property through the Twin Lakes golf course before it joins San Pedro Creek.

Airport development between 1928 and the 1970s resulted in the filling of portions of the Slough to accommodate runways, the conversion of grassland to accommodate a terminal, and the establishment of flood control channels and dikes, all of which caused the formation of basins within the Slough that gradually became cut-off from tidal circulation. However, the Slough still contains several channels that support tidal flow, for example, the designated Mesa Road Tide Channel, as well as formerly tidal areas and non-tide engineered wetland basins.

Currently, the parts of the Airport not occupied by facilities consist of a major portion of the Goleta Slough Ecological Reserve (GSER) and Goleta Slough State Marine Conservation Area and a variety of modified habitats. (The GSER is comprised of approximately 400 acres of the City-owned portion of the Slough and 34 acres owned by the California Department of Fish and Wildlife [CDFW].) Dominant vegetation includes pickleweed, saltgrass, and alkali wetlands, with brackish or freshwater wetland along upper wetland margins and within the several on-airport creeks. The upper Slough transitions to upland communities, including oak woodlands, coastal sage scrub, and annual grassland. The Slough supports rare, declining, and migratory wildlife, including sensitive and special interest bird species. These resources are discussed in more detail in the Special-Status Species subsection.

Within the past ten years, a number of Airport improvements have continued to shape the biology of the Airport. Tecolotito and Carneros Creeks were moved to accommodate the shifting of Runway 7-25 westward. Runway safety areas (RSAs) were extended on both sides of Runway 7-25, new taxiway improvements, new service roads and airfield drainage improvements were installed, as well as the removal of infield wetland habitat in and around the runways and taxiways. On-airport habitats are also routinely altered by the Santa Barbara County Flood Control District (SBFCD) for purposes of flood control and maintenance.

The Airport is also actively managing approximately 15 acres of the Goleta Slough Ecological Reserve, which is currently undergoing a habitat maintenance, monitoring and reporting program as required mitigation for the Airfield Safety Projects. A number of habitat restoration projects have occurred on the Airport, including the Airfield Storm Drain, Area R-2, Basin E/F Tidal Restoration, Firestone Drainage, Fuel Farm Ditch, Las Vegas Creek, Safety Area Grading Mitigation, Tecolotito Berms, Tecolotito/Carneros Creeks Banks, and Verhelle Bridge Relocation Restoration.

Regulatory Setting

Federal

The *Endangered Species Act* (ESA) provides legislation to protect federally-listed plant and animal species. Impacts to listed species require the responsible agency or individual to formally consult with the U.S. Fish and Wildlife Service (USFWS) (or National Marine Fisheries Service [NOAA Fisheries], if appropriate) to determine the extent of impact to a particular species. If USFWS or NOAA Fisheries determine that impacts to a species would likely occur, alternatives and measures to avoid or reduce impacts must be identified. USFWS and NOAA Fisheries also regulate activities conducted in Federal critical habitat, which are geographic units designated as areas that support primary habitat constituent elements for listed species.

The *Magnuson-Stevens Fishery Conservation and Management Act* (MSA) was originally passed in 1976 and most recently reauthorized in 2007.[3] Under the law, eight Regional Fishery Management Councils are charged with managing fisheries in Federal waters along the Atlantic, Pacific,

[3] Known as the *Magnuson-Stevens Fisheries Conservation and Management Reauthorization Act of 2006*, available at: http://www.nmfs.noaa.gov/sfa/laws_policies/msa/.

and Gulf Coasts. In the Santa Barbara area, the MSA is implemented by NOAA Fisheries, West Coast Region.

The Councils are responsible for preparing Fisheries Management Plans, in which Essential Fish Habitat (EFH) is identified. EFH includes all types of aquatic habitat, (i.e., wetlands, coral reefs, seagrasses, and rivers) where fish spawn, breed, feed, or grow to maturity. For any Federal action that may adversely affect EFH, Federal agencies must provide NOAA Fisheries with a written assessment of the effects of that action on EFH (60 CFR §600.815).

The *Migratory Bird Treaty Act* (MBTA) *of 1918* protects all migratory birds, including their eggs, nests, and feathers. The MBTA was originally drafted to put an end to the commercial trade in bird feathers, popular in the latter part of the 1800s. The MBTA is enforced by the USFWS, and potential impacts to species protected under the MBTA are evaluated by the USFWS in consultation with other Federal agencies.

The *Fish and Wildlife Coordination Act* requires that agencies consult with the state wildlife agencies and the Department of the Interior (USFWS) concerning the conservation of wildlife resources where the water of any stream or other water body is proposed to be controlled or modified by a Federal agency or any public or private agency operating under a Federal permit.

Executive Order (E.0.) 13112, *Invasive Species* directs Federal agencies to use relevant programs and authorities, to the extent practicable and subject to available resources, to prevent the introduction of invasive species and provide for restoration of native species and habitat conditions in ecosystems that have been invaded. The FAA is to identify proposed actions that may involve risks of introducing invasive species on native habitat and populations. "Introduction" is the intentional or unintentional escape, release, dissemination, or placement of a species into an ecosystem as a result of human activity. "Invasive species" are alien species whose introduction does, or is likely to, cause economic or environmental harm or harm to human health.

The *Clean Water Act* (CWA), section 404 allows the U.S. Army Corps of Engineers (USACE) to regulate the discharge of dredged and/or fill material into "Waters of the United States" (waters), including wetlands. The term "waters" is defined in the USACE regulations (Title 33 Code of Federal Regulations [CFR] section 328.3[a]) as:

1. All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;

2. All interstate waters including interstate wetlands;

3. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect foreign commerce including any such waters:

i. Which are or could be used by interstate or foreign travelers for recreational or other purposes; or
ii. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
iii. Which are used or could be used for industrial purpose by industries in interstate commerce;

4. All impoundments of waters otherwise defined as waters of the U.S. under the definition;

5. Tributaries of waters identified in paragraphs (a) (1) through (4) of this section;

6. The territorial seas;

7. Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a)(1) through (6) of this section.

The term "wetlands" (a subset of waters) is defined in 33 CFR 328.3(b) as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." The discharge of dredge or fill material into waters, including wetlands, requires authorization from the USACE prior to impacts.[4]

E.O. 11990*, Protection of Wetlands* also protects wetlands as defined by "those areas that are inundated by surface or groundwater with a frequency sufficient to support, and under normal circumstances, does or would support a prevalence of vegetation or aquatic life that require saturated or seasonally saturated soil conditions for growth and reproduction." Categories of wetlands include swamps, marshes, bogs, sloughs, potholes, wet meadows, river overflows, mud flats, natural ponds, estuarine areas, tidal overflows, and shallow lakes and ponds with emergent vegetation. Wetlands exhibit three characteristics: hydrology, hydrophytes (plants able to tolerate various degrees of flooding or frequent saturation), and poorly drained soils.

State

The *California Endangered Species Act* (CESA) ensures legal protection for plants listed as rare or endangered, and species of wildlife formally listed as endangered or threatened by the State. This State law also lists California Special Concern (CSC) species based on limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, or educational

[4] For tidally influenced waters, the USACE has two limits to its jurisdiction: one for Section 10 of the *Rivers and Harbors Act* and one for Section 404 of the CWA. The shoreward limit to the USACE jurisdiction under Section 10 extends to the line on the shore reached by the plane of the mean high water, which is 5 feet above mean low water. The shoreward limit for jurisdiction under the USACE Section 404 is based on the high tide line. If there are wetlands meeting the USACE criteria abutting or adjacent the high tide line, then the USACE jurisdiction under Section 404 extends to the limit of those wetlands.

value. Under State law, CDFW is empowered to review projects for their potential to impact State-listed and CSC species and their habitats.
In addition, the *California Fish and Game Code* (CFGC) states that "Fully Protected" (FP) species may not be taken or possessed without a permit from the Fish and Game Commission (Commission) and/or CDFW. Information on these species can be found within section 3511 (birds), section 4700 (mammals), section 5050 (reptiles and amphibians), and section 5515 (fish) of the CFGC.

The *California Ecological Reserve Act of 1968* (CFGC sections 1580-1585) established the Goleta Slough Ecological Reserve. As defined by the CFGC, section 1584, "ecological reserve" means land or land and water areas that are designated as an ecological reserve by the Commission pursuant to Section 1580 and that are to be preserved in a natural condition, or which are to be provided some level of protection as determined by the Commission, for the benefit of the general public to observe native flora and fauna and for scientific study or research.

Under CFGC section 1900, et seq., the *California Native Plant Protection Act of 1977* (also managed by CDFW), was enacted to identify, designate, and protect rare plants. In accordance with CDFW guidelines, plant species included on the California Native Plant Society (CNPS) lists 1A, 1B, and 2 are considered "rare" under the Act, and must be fully evaluated under CEQA. Impacts to plants on CNPS lists 3 and 4 are also often evaluated in CEQA documents, especially if protected at the local level. CNPS list 3 plant species are those for which little information is known, while plants included on CNPS list 4 have limited distributions.

The *Marine Life Protection Act of 1999* aims to protect California's marine natural heritage by establishing a statewide network of marine protected areas (MPAs) to protect the diversity and abundance of marine life, the habitats they depend on, and the integrity of marine ecosystems (see CFGC, section 2853). MPAs along the central California coast (Pigeon Point to Point Conception) have been in effect in State waters since September 21, 2007. The Goleta Slough State Marine Conservation Area includes the waters below the mean high tide line within Goleta Slough northward of latitude 34° 25.02' N. The State Marine Conservation Area designation limits its recreational and/or commercial take to protect the Slough's specific resources (CDFG 2012).

CFGC, section 1600 et seq. (Streambed Alteration) allows CDFW to regulate activities which "will substantially divert, obstruct, or substantially change the natural flow or bed, channel or bank, of any river, stream, or lake designated by CDFW in which there is at any time an existing fish or wildlife resource or from which these resources derive benefit." CDFW takes jurisdiction to the top of bank of a stream, or the limit of the adjacent riparian vegetation, often referred to as "streambed and associated riparian habitats." Applications to CDFW for Streambed Alteration under Section 1600 et seq. must include a complete certified CEQA document.

Within estuary environments, waters are not regulated under Section 1600 of the CFGC where waters are principally marine, aquatic shorelines are shaped principally by tidal current and wave action not by fluvial processes, vegetation is saline marsh and not brackish or freshwater vegetation, and marine fish and invertebrate communities are prevalent. Conversely, areas dominated

by fresh and brackish salinities and freshwater aquatic species, with fluvial erosion patterns, are regulated under Section 1600.

The *Porter-Cologne Water Quality Control Act* allows local regional water quality control boards (RWQCBs) to regulate discharges of waste, or proposals to discharge waste, within any region that could affect a "water of the State" (*Water Code*, Section 13260(a)), pursuant to provisions of Section 401 of the Federal CWA. Waters of the State are defined as "any surface water or groundwater, including saline waters, within the boundaries of the state" (*Water Code*, Section 13050(e)). Before the USACE will issue a CWA section 404 permit, applicants must receive a CWA section 401 Water Quality Certification from the RWQCB. If a CWA section 404 permit is not required for the project, the RWQCB may still require a permit (i.e., Waste Discharge Requirement) under the *Porter-Cologne Water Quality Control Act*. Applications to the RWQCB must include a complete certified CEQA document.

Finally, the *California Coastal Act* (Coastal Act) is administered by the California Coastal Commission (CCC) to prevent impacts in the "Coastal Zone." From three miles seaward, the Coastal Zone generally extends approximately 1,000 yards inland, although in less developed areas, it can extend up to five miles inland from the mean high tide line; it can also be considerably less than 1,000 yards inland in developed areas. The Coastal Act protects designated sensitive coastal areas by providing additional review and approvals for proposed actions in these areas, i.e., a Coastal Development Permit (CDP) is required for almost all development within the Coastal Zone. The Coastal Act also directs each city or county within the Coastal Zone to prepare a Local Coastal Program (LCP) for CCC certification. Refer to Exhibit 1A for the location of the Coastal Zone in the areas near the Airport.

The Coastal Act includes specific sections that limit uses allowed in water and marine environments and in "environmentally sensitive habitat areas" (ESHAs). Section 30121 of the Coastal Act defines wetlands as "...lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, swamps, mudflats, and fens…" The Coastal Act allows disking, filling, or dredging of wetlands for certain uses, such as restoration.

Section 30233 of the Coastal Act sets forth specific limitations on uses allowable in wetlands.[5] The limitations are generally defined in a three-part test as follows:

1. The purpose of the project is limited to one of eight allowable uses identified in Section 30233;

2. The project has no feasible less environmentally damaging alternative; and

[5] In contrast to the USACE, which uses a three-parameter definition to delineate wetlands, the CCC essentially uses the Cowardin method of wetlands classification, which defines wetland boundaries by a single parameter (i.e., hydric soils, hydrophytic vegetation, or hydrology) (Cowardin et al. 1979). The CCC wetland definition is generally more encompassing than either the USACE or CDFW definition in most respects.

3. Adequate mitigation measures to minimize the adverse impacts of the proposed project on habitat values have been provided.

Section 30240 of the Coastal Act mandates that only resource-dependent uses may be allowed in ESHAs. Resource-dependent uses are typically defined as nature study, aquaculture, limited and passive public recreational facilities that provide coastal resource educational experiences, or similar resource-dependent activities. The following three main elements must be met for an area or habitat to be considered an ESHA: first, a geographic area can be designated an ESHA either because of the presence of individual species of plants or animals or because of the presence of a particular habitat; second, for an area to be designated as an ESHA, the species or habitat must be either rare or it must be especially valuable; and three, the area must be easily disturbed or degraded by human activities.

Local

The following City regulations also provide protection for biological resources (see Section 4.2.2, Applicable Plans and Policies for identification of specific General Plan and LCP policies regarding the protection of biological resources at the Airport):

- The *Santa Barbara General Plan*, Conservation Element requires enhancement and preservation of critical ecological resources (e.g., marine resources, major drainage channels, endangered species habitat, perennial grassland, oak woodland and specimen trees).

- The *Santa Barbara General Plan*, Environmental Resources Element includes goals and policies for managing the City's biological and water resources.

- The City's *Coastal Plan: Airport and Goleta Slough* (2003) is a certified LCP specific to development at the Airport that implements Coastal Act policies requiring protection of ESHAs and other sensitive biological resources.

- *Santa Barbara Municipal Code*, Title 22, Environmental Policy and Construction, Chapter 15.20, Tree Preservation and Section 22.10.060, City Vegetation Removal Ordinance requires protection and/or replacement of healthy specimen trees and significant vegetation.

- *Santa Barbara Municipal Code*, Title 29, Goleta Slough Reserve Zone (G-S-R) protects sensitive environmental resources through the City's zoning ordinance by providing additional development standards for lands at the Airport within the Coastal Zone. Section 29.25.030 lists the uses permitted in the G-S-R zone subject to a Goleta Slough CDP:

    - Restoration projects;
    - Incidental public service projects;
    - Nature study, bird watching, aquaculture, and other resource-dependent activities;

- Flood control or water supply projects;
- Fish and wildlife habitat improvement; and
- Repair or maintenance activities that do not result in enlargement or expansion of the object being repaired.

Specific to the Airport are the following allowable uses:

A. Maintenance Activities

1. Trimming of vegetative growth within the extended runway safety area and flight control area in accordance with FAA regulations, as required.

2. Mowing of grass and maintenance in accordance with FAA requirements of areas directly adjacent to and parallel to the runways and taxiways within 135 feet of the existing paved surface.

3. Maintaining the existing approach lighting system and access road, the existing glide slope, the existing Airport Surveillance Radar and access road, the existing Airport patrol road running along the perimeter of the Slough, and safety related facilities and uses necessary to maintain existing airport capacity and operations.

Section 29.25.040 states that activities such as "the clearing of channels, digging of ditches, desilting, and dredging" would require a Goleta Slough CDP.

Special-Status Species

Special-status species are plant, fish, and wildlife species with limited distribution or abundance, are particularly vulnerable to human disturbances, or have special educational, scientific, cultural, or historic interest. As defined by the City, special-status species include (Final General Plan EIR, p. 7-9):

- Listed Species: Species listed as endangered, threatened, or rare under the Federal and/or State Endangered Species Acts, regardless of any other status of the species.

- Special-Status Species: Species that are not listed, but are designated as State FP or CSC species for wildlife, or CNPS List 1A (Presumed Extinct in California) or CNPS List 1B (Rare, Threatened, or Endangered in California and elsewhere) for plants.

- Species of Interest: Species identified as International Union for Conservation of Nature and Natural Resources (IUCN) Least Concern, CNPS List 4.2, CNPS List 4.3, locally rare, species of local interest, or regionally rare by a qualified biologist.

As part of the current Airport Master Plan, detailed vegetation maps, along with a Special-Status Species Inventory containing descriptions of all mapped vegetation communities, non-vegetated habitats, and potentially occurring special-status species, have been prepared for the biological

study area (defined as the non-airfield portions of the Airport) (Appendix C of the Draft Program EIR). **Exhibit 4B** shows the location of special-status species and their associated habitats within the biological study area. Based on this recent inventory, several rare plants are present in transitional areas of the Slough, including Coulter's goldfields and southern tarplant, which have California Rare Plant Ranks (CRPR) of 1B.1 and 1B.2, respectively. Special-status plants, including locally rare plants, with the potential to occur at the Airport are listed in **Table 4C**.

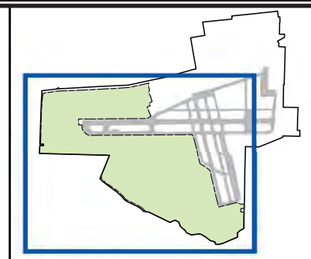
TABLE 4C
Special-Status Plants Likely to Occur
Santa Barbara Airport

Common - *Scientific* Name	Life Form	Regulatory Status	Primary Habitat Association	Potential to Occur
Parish's glasswort - *Arthrocnemum Subterminale* (=*Salicornia subterminalis*)	perennial herb	LR	Coastal salt marsh, alkali sink, coastal sage scrub, wetland-riparian	Present
Watson's saltbush -*Atriplex watsonii*	perennial herb	LR	Coastal strand, coastal salt marsh, coastal sage scrub, wetland-riparian	Possible
Saltwort - *Batis maritima*	shrub	LR	Coastal strand, coastal salt marsh, wetland-riparian	Likely
Southern tarplant - *Centromadia parryi* ssp. *australis*	annual herb	CRPR 1B.1; LR	Margins of marshes and swamps, vernally mesic valley and foothill grassland, vernal pools	Present
Water pygmy weed - *Crassula aquatic* (=*Crassula saginoides*)	annual herb	LR	Yellow pine forest, foothill woodland, chaparral, valley grassland, wetland-riparian	Possible
Shore grass - *Distichlis littoralis* (=*Monanthochloe littoralis*)	perennial herb	LR	Coastal salt marsh, wetland-riparian	Likely
Short-seeded waterwort - *Elantine brachysperma*	annual or perennial herb	LR	Many plant communities, including wetland-riparian	Present
Mature coyote thistle - *Eryngium vaseyi*	perennial herb	LR	Valley grassland, wetland-riparian	Possible
Low barley - *Hordeum depressum*	annual herb	LR	Many plant communities, including wetland-riparian and grasslands	Present
Coulter's goldfields - *Lasthenia glabrata*	annual herb	CRPR 1B.1; LR	Salt water marshes and swamps, playas, vernal pools	Present
California marsh rosemary - *Limonium californicum* var. *californicum*	perennial herb	LR	Coastal salt marsh, coastal strand, wetland-riparian	Possible
Lemmon's canary grass - *Phalaris lemmonii*	annual herb	LR	Coastal sage scrub, valley grassland, foothill woodland, mixed evergreen forest, wetland-riparian	Possible
Pillwort - *Pilularia americana*	fern	LR	Valley grasslands, wetland-riparian	Possible
Estuary seablight - *Suaeda esteroa*	perennial herb	CRPR 1B.2; LR	Marshes and swamps (coastal salt)	Possible
Wooly seablight - *Suaeda taxifolia*	shrub	CRPR 4.2; LR	Coastal bluff scrub, coastal dunes, marshes and swamps (margins of coastal salt marshes)	Likely
Slim aster - *Symphyotrichum subulatum* var. *parviflorum (Aster subulatus* var. *ligulatus*)	perennial herb	LR	Saltflats and salt marshes, vacant lots	Likely
Arrow grass - *Triglochin concinna*	perennial herb	LR	Coastal salt marsh, creosote bush scrub, sagebrush scrub, pinyon-juniper woodland	Possible

Source: Dudek 2012; see Appendix C of the Draft Program EIR.

Legend:
CRPR = California Rare Plant Rank: 1B – Plants Rare, Threatened, or Endangered in California or elsewhere; 4-Plants of Limited Distribution – A Watch List; 0.1 – seriously threatened in California; 0.2 – Fairly threatened in California; 0.3 – Not very threatened in California or no known threats.

LR = Locally rare per *Rare Plants of Santa Barbara County* (Wilken 2010)



Biological Survey Area

Airport Property Line

Special-Status Species Inventory

Special-Status Species- Dudek (2012)

- Coulter's goldfields
- Coulter's goldfields *(Population count provided if known)*
- southern tarplant
- southern tarplant

California Natural Diversity Database - 2012

Special Status Species

- Belding's savannah sparrow
- estuary seablite
- light-footed clapper rail

Sensitive Biological Habitat

- Southern Coastal Salt Marsh

Sensitive Nesting Habitat - DUDEK 2012

- Belding's savannah sparrow
- white-tailed kite

Special-Status Species Habitat - DUDEK 2012

- ABG - Annual Brome Grassland
- ARWT - Arroyo Willow Thickets
- ASH - Alkali Heath Marsh
- BG - Bare Ground
- CLOW - Coast Live Oak Woodland
- DRDG - Dredge Spoil or Work Area
- MBP - Meadow Barley Patches
- MBR - Salt Marsh Bulrush Marshes
- MDFT - Mudflats
- MFT - Mulefat Thickets
- OW - Open Water
- PW - Pickleweed Mats
- QS - Quailbush Scrub
- SGF - Salt Grass Flats
- STFT - Saltflats

0 50100 200 300 400 500 Feet

HOLLISTER AVE

Tecolotito Creek

Carneros Creek

Mesa Road Tidal Channel

Belding's savannah sparrow

estuary seablite

light-footed clapper rail

Southern Coastal Salt Marsh

HABITAT TYPES	ABG	ARWT	ASH	BG	CLOW	DRDG	MBP	MBR	MDFT	MFT	OW	PW	QS	SGF	STFT
Special-Status Species:															
Belding's savannah sparrow			◆									◆		◆	
Coulter's goldfields									◆			◆		◆	◆
estuary seablite			◆									◆			
least Bell's vireo		◆								◆					
light-footed clapper rail								◆	◆			◆			◆
southern tarplant	◆			◆		◆	◆						◆		
steelhead											◆				
tidewater goby											◆				
white-tailed kite					◆										
woolly seablite			◆						◆			◆	◆	◆	◆

Source: *Special-Status Species Inventory for the Santa Barbara Airport Master Plan Update*, Dudek 2012

Santa Barbara Airport

Exhibit 4B

SPECIAL-STATUS SPECIES INVENTORY

Goleta Slough and the Airport contain habitat for numerous special-status and common wildlife species. Several species of raptors, such as the State FP white-tailed kite and the northern harrier often hunt within portions of wetland habitat. Sandpipers and plovers foraging in mudflats and other sparsely vegetated areas feed on invertebrates. During particularly wet periods, these species also may feed in seasonal pools that form in grassy areas near the airfield. The pickleweed marsh in the Slough provides nesting habitat for the State endangered Belding's savannah sparrow and formerly hosted the Federal endangered light-footed clapper rail.

The brackish waters of Tecolotito and Carneros Creeks, as well as other tidal channels within the Slough, are occupied by the tidewater goby, a Federal endangered species and a CSC. Steelhead of the southern California distinct population segment (DPS), also a Federal endangered species and a CSC, may occasionally pass through Goleta Slough in transit to upstream spawning areas. The following information is taken primarily from Chapter 2 of the Slough Management Plan (GSMC 2015), which in turn references Appendix C of the Draft Program EIR. The entire Slough Management Plan is incorporated by reference into this Recirculated Draft Program EIR and can be reviewed in its entirety at http://www.goletaslough.org/committee/2016-goleta-slough-management-plan/**.**

- Tidewater gobies are found in brackish or freshwater in bays, sounds, and lagoons and creeks along the coast from Del Norte County south to San Diego County. Although this species inhabits creeks along the entire coast of Santa Barbara County and was present in Goleta Slough in the 1960s, collecting efforts in the 1990s failed to find tidewater gobies there, and the species was considered extirpated in the area in 2005. However, surveys conducted in 2006 in relation to the Airport's Creek Relocation Project recorded tidewater gobies in both Tecolotito and Carneros Creeks. Post-construction surveys also found the species in both of these creeks in 2007 and 2008. Surveys within limited areas of Basin E/F and adjacent portions of Tecolotito Creek resulted in observations of one tidewater goby in September/October 2010, five in May 2011, and none in August 2011. The species has also been observed in Atascadero Creek, but so far, has not been recorded in San Pedro or San Jose Creeks. The USFWS did not include any portion of the Airport in its final designation of tidewater goby critical habitat in 2008 (73 Federal Register [FR] 5920-6006); all five creeks converging in Goleta Slough were included within a proposed revision of critical habitat for the species in 2011 (76 FR 64996-65060).

- Adult steelhead occurrence in the Slough ~~is limited to periods~~generally occurs when the estuary is open and water depths in the river allow adults to use it as a migration corridor to the upper watershed. Juvenile steelhead may be present within upstream freshwater habitats of the Slough depending upon seasonal variations, and have been reported in upstream habitats of Atascadero, San Jose, San Pedro, and Tecolotito Creeks as well as in some of their tributaries. Adult steelhead has been reported in the lower sections (south of Highway 101) of San Pedro, Atascadero, and Maria Ygnacio Creeks.

  According to information from the National Marines Fisheries Service letter on the Recirculated Draft Program EIR (dated September 6, 2016) (**Appendix B**, Letter 6), although the frequency that adult or juvenile steelhead pass through the Slough has not been monitored, the persistent presence of juveniles rearing in the major spawning and rearing

tributaries in the Goleta Slough watershed and observations of adults in the tributaries of San Pedro, Atascadero, and Maria Ygnacio creeks suggest that steelhead likely travel through the Slough annually. The Goleta Slough is the sole point of entrance and exit for steelhead using the tributaries to the Goleta Slough watershed.

In addition, adult steelhead may use the Slough as "over-summering refugia (most frequently as spawned out kelts)"[6] and for juvenile rearing (**Appendix B**, Letter 6). If this occurs, the availability of abundant food sources for juveniles can support accelerated growth, and subsequent increased ocean survival; juvenile use of estuaries typically increases when the sand berm closes the estuary and mildly brackish or freshwater conditions develop (Bond 2006, Bond et al. 2008, Kelley 2008, Atkinson 2010, Hayes et al. 2011). Management of the sand berm to Goleta Slough is ongoing and requires the balancing of several different goals including wildlife management, flood control, and aviation safety.

Wildlife species protected by Federal and/or State regulations that are likely to occur at the Airport are listed in **Table 4D**. Although listed on the California Natural Diversity Database (CNDDB) for the general area, no suitable habitat exists at the Airport for the following federally protected species: California red-legged frog, California least tern, southwestern willow flycatcher, and snowy plover.

Wildlife Hazards

In addition to the species identified in **Tables 4C** and **4D**, the Airport's scrub habitats and small amount of woodland support a more upland assemblage of common plant and wildlife species. Based on information received from the Santa Barbara Audubon Society in a letter regarding the Draft Program EIR, the following birds have been known to use the Slough historically and may or may not continue to use the undeveloped portions of the Slough: American bittern; Black-crowned night-heron; burrowing owl (wintering); California horned lark; California least tern; Cooper's hawks; double-crested cormorant; and numerous others. Grasshopper sparrows nest near the Slough on More Mesa and the great blue heron has a nesting rookery at Goleta Beach.

A more comprehensive discussion of wildlife at the Airport and its environs, and in particular, birds, is contained in a recently completed *Santa Barbara Airport Wildlife Hazard Assessment* (WHA) for the Airport (Dudek et al. 2016). FAA has strict regulations regarding the potential for bird strikes at airports. This report has been included in ~~this~~ the Recirculated Draft Program EIR as Appendix B.

[6] Unlike a typical salmon that dies after it spawns, steelhead can repeat spawn like freshwater trout. These repeat spawning steelhead, known as kelts, go back out to the ocean after they spawn to start the cycle over again.

TABLE 4D
Special-Status Wildlife Likely to Occur
Santa Barbara Airport

Common – *Scientific* Name	Regulatory Protection	Regulatory Status	Habitat Types
Birds			
Belding's savannah sparrow - *Passerculus sandwichensis beldingi*	CESA; City's Local Coastal Program	State Endangered	Alkali heath marsh, mudflats, pickleweed mats, salt flats[1]
Least Bell's vireo - *Vireo bellii pusillus*	ESA; CESA	Federal Endangered; State Endangered	Arroyo willow thickets, mulefat scrub[2]
Light-footed clapper rail - *Rallus longirostris levipes*	ESA; CESA	Federal Endangered; State Endangered	Mudflats, pickleweed mats, salt marsh bulrush, saltflats
White-tailed kite - *Elanus leucurus*	CFGC	State Fully Protected	Coast live oak woodland[3]
Fish			
Steelhead, Southern California DPS - *Oncorhynchus mykiss irideus*	ESA; CESA	Federal Endangered; California Species of Concern	Open water
Tidewater goby - *Eucyclogobius newberryi*	ESA; CESA	Federal Endangered; California Species of Concern	Open water

Source: Dudek 2012; see Appendix C of the Draft Program EIR.

Legend:
CESA = California *Endangered Species Act*
ESA = Federal *Endangered Species Act*
CFGC = *California Fish and Game Code*
DPS = Distinct population segment

[1] Refers to breeding habitat only. Also forages in mudflats, saltflats, and a variety of scrub and grassland communities, especially near nesting habitat.
[2] Refers to breeding habitat only. Also forages in a variety of adjacent habitats.
[3] Refers to breeding habitat only. Also forages in a variety of grassland and open scrub communities.

Environmentally Sensitive Habitat Areas

According to CNDDB, one special-status natural community occurs in the biological study area: southern coastal salt marsh. In addition, various vegetation communities occurring in the biological study area receive special protection under the Coastal Act or other regulations or agencies.

Southern Coastal Salt Marsh

Southern coastal salt marsh was identified as occurring in the biological study area (CNDDB 2011). This sensitive natural community occurs in California along the coast from Point Conception southward. In the biological study area, it occurs in the form of four distinct vegetation communities: alkali heath marsh, pickleweed mats, salt grass flats, and salt marsh bulrush. In addition

to being listed as a sensitive natural community by the CDFW, southern coastal salt marsh at the Airport provides habitat for listed species as discussed below:

- Alkali heath marsh - Belding's savannah sparrows nest occasionally in alkali heath marsh and may use this community year-round for cover. Several rare plant species have the potential to occur within this community.

- Pickleweed mats - Pickleweed mats alliance in the biological study area currently provides nesting habitat for one listed bird species: Belding's savannah sparrow. This habitat also potentially provides habitat for a second listed bird species, the light-footed clapper rail, although without tidal circulation and predator management, the Airport's pickelweed marsh habitat is not presently suitable for the clapper rail. Some birds of prey forage in pickleweed mats and other salt marsh habitats when not inundated, including the white-tailed kite. Several special-status plant species also have the potential to occur in this community.

- Salt Marsh Bulrush - On the Airport property, it is unlikely that special-status wildlife species would regularly occupy this habitat; however, two special-status bird species (nesting) have low potential to utilize this habitat, i.e., the least bittern and tricolored blackbird. Light-footed clapper rails, extirpated from Goleta Slough, may have formerly nested in this community.

Riparian Scrub Communities

Two riparian vegetation communities found in the biological study area (arroyo willow thickets and mulefat scrub) are potentially habitat for special-status species, including at least one listed species. Although not specifically mentioned in the Airport's LCP, the LCP calls for protection of endangered species habitat, which potentially includes these communities.

- Arroyo Willow Thickets - Least Bell's vireo has occurred within willow habitat along Carneros Creek. Yellow warblers and yellow-breasted chats have been recorded within the biological study area during migration, and have some potential to nest there. ~~White-tailed kites have roosted in willows within the biological study area and have the potential to roost in several locations.~~ A small potential exists for birds of prey, such as the white-tailed kite and Cooper's hawk, to nest in this community. However, based on a year-long survey conducted in connection with the December 2014 - November 2015 WHA, single kites were observed eight times on the entire Airport property with only one of these observations in proximity to Carneros Creek; no nests were observed near the creek (Dudek et al. 2016).

- Mulefat Scrub - Mulefat scrub, when occurring adjacent to arroyo willow thickets, may potentially provide habitat for least Bell's vireos.

Open Water

Open water, identified as a habitat type within the biological study area, is important habitat for two listed species: tidewater goby and steelhead. As previously discussed, tidal channels and creeks within the biological study area provide habitat for the tidewater goby. This species occurs in less saline waters that occur away from the ocean, but has the potential to occur in streams and tidal channels anywhere within the biological study area. Steelhead of the southern California DPS have been reported in creeks flowing into the channel that meets the main slough channel at Goleta Beach County Park. Although this species is not known to occur in Carneros Creek, suitable spawning habitat is present upstream, and regular monitoring of the creek for steelhead has not occurred. ~~and s~~Steelhead would have to travel through the lower reaches of the stream, within the biological study area.

Wetland communities

Various wetland communities, in addition to those mentioned above, are protected under the Coastal Act, the CWA, or the CFGC. As documented in Appendix D of the Draft Program EIR, biologists performed a Wetlands Inventory of the biological study area during February through March 2012 (Dudek 2012). All areas identified as being potentially subject to the jurisdiction of the USACE, RWQCB, CDFW, and/or CCC were field verified and mapped. Biologists also surveyed the infield for potential wetlands. These undeveloped areas were located near the runways and taxiways where the Airport has authority to maintain through regular mowing and occasional grading to deter use by wildlife and ensure the safety of aircraft. All developed areas (terminal, parking, hangers, airport facilities, etc.) that did not contain elements of natural vegetation were not surveyed for wetland habitat.

A detailed description of hydrophytic vegetative communities, hydric soils, and hydrology of the Airport is provided in Appendix D of the Draft Program EIR. The results of the wetlands inventory include areas delineated as jurisdictional by the USACE, RWQCB, CDFW, and CCC. The locations of these varying jurisdictional boundaries are shown on **Exhibit 4C**. Wetland communities at the Airport include all four on-Airport creeks, the Mesa Road Tidal Channel, and several sub-basins within Goleta Slough.

Many of the infield areas may also be subject to the jurisdiction of the CCC and potentially the USACE, especially to the west and south where the Airport was historically covered by Goleta Slough wetlands and where Tecolotito Creek once transected the Slough prior to its recent relocation. Hydrophytic vegetation was found to be intermittent to continuous through the majority of the infield areas that contain potential wetlands. This was especially evident in topographically depressed areas and areas adjacent to runways and storm drains, which likely receive greater amounts of local runoff. Alkali heath, meadow barley, and salt grass were the most common hydrophytes observed in these areas. Often when wetland vegetation had a clustered distribution, bare ground void or nearly void of vegetation was found in between these clumps. Upland vegetation was more evident as the survey continued to the east and north until it eventually dominated the infield areas.

Other indications of wetland potential included salt deposits, which were the widest spread primary indicator of hydrology within the infield areas and were often found on the surface of bare ground between clumps of hydrophytic vegetation and in unvegetated depressions. At one location, a storm drain was inundated with shallow runoff. A Baja California chorus frog (*Pseudacris hypochondriaca hypochondriaca*) was observed at this location further indicating the possibility of wetland habitat, although severely modified.

In conclusion, primary wetland indicators are present in western and southern infield areas as indicated above and presented on **Exhibit 4C**. These infield areas meet the definition of wetland under the Coastal Act and, therefore, the CCC could take jurisdiction over these areas. The USACE may also take jurisdiction under the CWA, section 404, based on the historical extent of the Goleta Slough and the wetland characteristics still evident in the infield areas. Additional surveys would be necessary to delineate the exact limits of jurisdiction based on vegetation and hydrologic conditions prior to any future proposed development(s). It is recommended that these surveys occur between late spring and summer prior to maintenance activities (i.e. mowing) when hydrophytic plants are in identifiable condition.

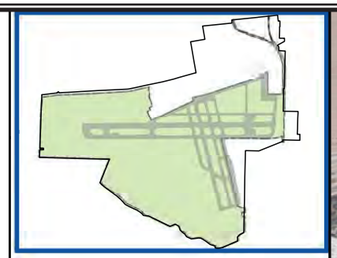
Other Vegetation Communities

Other vegetation communities, including some communities dominated by non-native vegetation, are often considered sensitive resources. At the Airport, eucalyptus groves are present along the Slough's border with UCSB. Although monarch butterflies are not known to roost within the biological study area, eucalyptus woodland there provides potential roosting habitat. At least one raptor species, the red-tailed hawk, has nested in this community within the biological study area, while others, such as the Cooper's hawk, have the potential to do so.

In addition, upland habitats can support sensitive species and provide a transitional area during floods or as sea level rise occurs. The area north of the Runway 7-23 between the runway's western end and Carneros Creek contains disturbed, upland habitat that is currently maintained for the runway safety area environment (i.e., grasses are typically maintained at six- to eight-inches in height). As documented in **Appendix C** (Final Program EIR), this area is low-quality foraging habitat for the white-tailed kite, and contains extremely low populations of suitable prey. The Airport's Wildlife Hazard Management Plan (WHMP) (which is a Federal requirement for Part 139-certified airports) requires that the Airport monitor rodent populations on the airfield and implement a periodic control program (City of Santa Barbara 2017). See further discussion of the WHMP later in this section.

Wildlife Movement within the Vicinity of Goleta Slough

As part of the environmental scoping process for this Program EIR, both the Goleta Slough Management Committee (GSMC) and CDFW had comments regarding the movement of wildlife from open spaces near Isla Vista (such as Devereux Slough) and Atascadero Creek on the other side of Goleta Slough. The Santa Barbara Wildlife Linkages Project (UCSB research project) is currently monitoring and reporting wildlife sitings and movement in the area. Bears have been sighted at



- Biological Survey Area
- Airport Property Line
- Stream Channel Centerline
- Sample Point

FEDERAL JURISDICTION

USACE

- Waters of the U.S.
- Wetlands

STATE JURISDICTION

RWQCB

- Waters of the State/Basin Plan

CDFG

- Streambed and Riparian

CCC

- Coastal Riparian
- Coastal Wetland
- Potential Wetlands

0 100 200 300 400 500 Feet

Source: *Wetlands Inventory for the Santa Barbara Airport Master Plan*, Dudek 2012

Santa Barbara Airport

Exhibit 4C

JURISDICTIONAL WETLANDS INVENTORY

the mouth of Devereux Slough, along Atascadero Creek, and on UCSB's campus; bobcats have also been documented within the region (UCSB 2014). Currently, the Airport's perimeter fence is a barrier to certain small and medium-sized mammals, such as coyotes, gray foxes, and bobcats, that might otherwise enter the Goleta Slough. The Airport has an ongoing Wildlife Hazard Management Program that allows the removal of any wildlife hazard on an as-needed basis (see applicable subsection of Section 4.2.2).

4.2.2 Applicable Plans and Policies

City General Plan Policies

The *Santa Barbara General Plan* (2011) has several policies in its Environmental Resources Element that would offer protection for biological resources at the Airport:

> ER11. Native and Other Trees and Landscaping. Protect and maintain native and other urban trees, and landscaped spaces, and promote the use of native or Mediterranean drought-tolerant species in landscaping to save energy and water, incorporate habitat, and provide shade.
>
> ER12. Wildlife, Coastal and Native Plant Habitat Protection and Enhancement. Protect, maintain, and to the extent reasonably possible, expand the City's remaining diverse native plant and wildlife habitats, including ocean, wetland, coastal, creek, foothill, and urban-adapted habitats.
>
> ER13. Trail Management. Existing and future trails along creeks or in other natural settings shall be managed for both passive recreational use and as native species habitat and corridors.
>
> ER15. Creek Resources and Water Quality. Encourage development and infrastructure that is consistent with City policies and programs for comprehensive watershed planning, creeks restoration, water quality protection, open space enhancement, storm water management, and public creek and water awareness programs.
>
> ER17. Creek Setbacks, Protection, and Restoration. Protection and restoration of creeks and their riparian corridors is a priority for improving biological values, water quality, open space and flood control in conjunction with adaptation planning for climate change.

The City's Conservation Element has biological resource policies that are similar to Coastal Act policies in terms of protection of resources and enhancement of sensitive habitats. Since the Airport's LCP policies are more specific to the Airport and the Slough than the City's more general Conservation Element policies, see the discussion below.

City Coastal Plan: Airport and Goleta Slough

Biological coastal policies for the Airport are found in the Environmentally Sensitive Habitat section of the Airport's LCP. Policies applicable to future development at the Airport, as recommended by the proposed Master Plan, are listed in **Table 4E**.

TABLE 4E
LCP Policies Regarding Biological Resources
Santa Barbara Airport

	Policy
Policy C-4	A buffer strip a minimum of 100 feet in width shall be maintained in a natural condition along the periphery of all wetland communities, based upon wetlands delineated in the map entitled "Airport and Goleta Slough Coastal Plan Wetland Habitats, dated January 1998," and/or the most recent available wetland survey of the site prepared in accordance with the definitions of Section 13577(b) of Title 14 of the California Code of Regulations, and shall include open water, coastal saltwater marsh, freshwater marsh, swamps, salt flats, mudflats, fens, seasonal wetland meadow, riparian woodland, shrub-scrub thicket and wetland transition habitats. Incidental Airport uses and facilities necessary for existing Airport operations and found to be consistent with PRC section 30233 may be provided and maintained. Where development of the Airfield Safety Projects renders maintenance of a 100-foot buffer area between new development and delineated wetlands infeasible, the City shall provide the maximum amount of buffer area feasible and all impacts to wetland habitat shall be mitigated to the maximum extent feasible such that no net loss of wetland habitat occurs.
Policy C-8	No uses incompatible with the protection and maintenance of the wetland habitat and its open space character will be allowed in areas under City jurisdiction.
Policy C-9	Any development approved within or adjacent to the wetland areas identified on the habitat map shall have been found to be consistent with PRC's sections 30233, 30230, 30231 and 30607.1. Within the sensitive habitat areas, the approval of any restoration project which contains project elements which are not specifically permitted under PRC section 30233 shall occur only after the State Department of Fish and Game makes the finding, under Section 30411, that the wetland is so severely degraded that major restoration which might include other uses not specifically permitted under Section 30233 is necessary and will have the primary effect of restoring the degraded area.
Policy C-10	All development and mitigation of impacts on Goleta Slough shall be consistent with the policies of the *Goleta Slough Ecosystem Management Plan*, which is adopted and incorporated herein as Appendix G as it pertains to the Airport property.
Policy C-11	The Airfield Safety Projects, specifically development of the Runway Safety Area Project for Runway 7-25 and construction of Taxiway M, shall not result in the permanent net loss of wetland or upland habitat. Wetland areas temporarily affected by construction activities shall be restored to pre-construction conditions. The required mitigation ratios for the estimated 13.30 acres of permanent wetland and 10.87 acres of permanent upland impacts associated with the Airfield Safety Projects shall be as follows: • Seasonal Wetlands 4:1 • Creeks and open channels 2:1 • Uplands 1:1 • Approximately 36 acres of wetland mitigation shall be accomplished in accordance with the Airport's October 2001 wetland mitigation plan for the Airfield Safety Projects, in addition to the supplementary mitigation required below. The upland mitigation shall be accomplished in accordance with the Airport's upland mitigation plan dated April 2002. • Prior to issuance of a Coastal Development Permit for the Airfield Safety Projects, final wetland and upland habitat mitigation, restoration, management, maintenance and monitoring plans shall

	be developed by a qualified biologist and/or resource specialist and shall be reviewed and approved by the California Department of Fish and Game. An implementation schedule shall be developed as part of the final mitigation plans that includes detailed descriptions of the mitigation sites and surrounding ecology, mitigation goals, objectives and performance standards; restoration and management actions including procedures and technical specifications for wetland and upland planting; methodology and specifications for removal of exotic species; soil engineering and soil amendment criteria; identification of plant species and density; maintenance requirements; monitoring methods, documentation requirements and submittal schedules for reviewing agencies; and performance criteria consistent with achieving the identified goals and objectives of mitigation; measures to be implemented if success criteria are not met; and long-term adaptive management of the restored areas for a period of not less than seven years. Compliance with the plans referenced above shall be a condition of approval of a Coastal Development Permit for the Airfield Safety Projects. • The City shall implement all habitat mitigation and restoration requirements prior to or in concurrence with development of the Airfield Safety Projects to comply with the above identified mitigation ratios. With respect to wetland mitigation and tidal restoration of Goleta Slough, the City shall implement all measures necessary to fulfill a 3:1 mitigation requirement for impacts to wetland habitat prior to or concurrently with development of the Airfield Safety Projects and shall continue to examine the feasibility of implementing tidal restoration as a means of meeting the full 4:1 wetland mitigation ratio requirement. • Once there is authorization from the FAA to proceed with tidal restoration, and concurrence with the California Department of Fish and Game and the Goleta Slough Management Committee on the nature, scope and schedule of the tidal restoration projects following completion of the tidal restoration experiment, the City shall act as lead agency to develop and implement a Tidal Restoration Plan for at least 13.30 acres with participation from U.C. Santa Barbara, the California Department of Fish and Game, the Goleta Slough Management Committee, and adjacent property owners. Should any participating agencies or property owners choose not to participate, or an agreement is not reached with all interested parties, the City shall continue to implement tidal restoration options to the maximum extent feasible unless the Commission or the FAA prohibit or deny tidal restoration. • Within five years of issuance of the Coastal Development Permit for the Airfield Safety Projects, the City shall present all documentation, findings and conclusions relative to the tidal restoration studies for review by the Commission. If the evidence demonstrates that tidal restoration is an infeasible means of satisfying the wetland mitigation requirements of the Airfield Safety Projects due to safety concerns, and/or the tidal restoration experiment or project is terminated at any point subsequent to implementation of an approved tidal restoration plan, the City shall immediately implement additional wetland mitigation measures to supplement mitigation efforts in full compliance with the 4:1 wetland mitigation requirements. • If the results of the Goleta Slough Tidal Restoration/Bird Strike Experiment indicate that tidal restoration will not significantly and adversely increase the potential for aircraft bird strikes as determined by the FAA, the City shall provide 13.30 acres of the required wetland mitigation as part of a future, long-term project to restore tidal circulation to portions of Goleta Slough. In the event that tidal restoration mitigation is determined to be infeasible, the City of Santa Barbara shall provide 13.30 acres of in-kind mitigation for impacts to seasonal wetlands to complete the mitigation requirement. The additional 13.30 acres of wetland mitigation will fulfill the Airport's requirements for wetland mitigation for the Airfield Safety Projects. Priority shall be given to on-site mitigation for the additional 13.30 acres of wetland mitigation. Off-site mitigation measures shall only be approved should it not be feasible to fully mitigate impacts on-site. The City shall coordinate with the California Department of Fish and Game and the Goleta Slough Management Committee to identify potential off-site mitigation sites. Off-site mitigation measures shall be implemented in an area in close proximity to the project as is feasible, and shall not be located outside of the Santa Barbara County area.

	Full compliance with all the above provisions of Policy C-11 shall be required by the terms and/or conditions of the Coastal Development Permit authorizing the Airfield Safety Projects.
Policy C-12	New development shall be sited and designed to protect water quality and minimize impacts to coastal waters by incorporating measures designed to ensure the following: protect areas that provide important water quality benefits, that are necessary to maintain riparian and aquatic biota and/or that are particularly susceptible to erosion and sediment loss; limit increase of impervious surfaces; limit disturbance of natural drainage features and vegetation; minimize, to the maximum extent feasible, the introduction of pollutants that may result in significant impacts from site runoff from impervious areas. New development shall incorporate Best Management Practices (BMPs) or a combination of BMPs best suited to reduce pollutant loading to the maximum extent feasible.
Policy C-15	Special-status plant and wildlife protection measures shall be implemented for all development projects that will potentially impact sensitive plant and wildlife species and/or that will result in disturbance or degradation of habitat areas that contribute to the viability of plant or wildlife species designated as rare, threatened, or endangered under State or Federal law, including plant species designated as rare by the California Native Plant Society.
Policy C-16	With respect to the Airfield Safety Projects, all construction, habitat mitigation and restoration plans, and special-status plant and wildlife mitigation and protection measures, shall be reviewed and approved by the regulatory agency/agencies having jurisdiction over the identified resource, including the California Department of Fish and Game, U.S. Fish and Wildlife Service, and the National Marine Fisheries Service, and shall at a minimum include: • Project timing and implementation schedules that describe timing, duration, methods, and staging areas for all construction operations and restoration plans. The project timing and implementation schedules shall include a submittal schedule for implementation of proposed restoration plans and for all resource monitoring reports. • Prior to commencement of construction activities, surveys of the project area shall be conducted for special status wildlife species. Should the site surveys identify special status wildlife species on or near the project site, a qualified biologist or resource specialist shall develop a plan to avoid or mitigate potential impacts to the sensitive species. Resource avoidance or mitigation plans shall be reviewed and approved by the regulatory agency/agencies having jurisdiction over the identified resource and commencement of construction shall not proceed until such review and approval is granted. • Construction shall not occur during the nesting and breeding season from mid-March to the end of June, unless a qualified biologist and/or resource specialist and the California Department of Fish and Game determine with certainty that construction activities will not adversely impact sensitive bird species. Special resource avoidance and management plans shall be implemented for Belding's savannah sparrow. • Construction activities related to the Tecolotito Creek realignment shall minimize extensive stream diversions during construction and shall minimize potential impacts to steelhead. Construction of the new creek channel shall be completed prior to connecting with the existing channel and final diversion of stream flow into the new creek channel shall be conducted only between July 15 and October 1 of any given year to avoid the migration period of steelhead. • Prior to commencement of construction activities, surveys of the project area shall be conducted for special status plant species. Potential impacts to sensitive plant species shall be fully mitigated and a qualified botanist or other resource specialist shall develop a plan to avoid or mitigate potential impacts to the sensitive species. Resource avoidance or mitigation plans shall include, but not be limited to, species-specific salvage or seed collection, salvage of topsoil, restoration of disturbed areas and establishment of new populations in suitable habitat areas. Mitigation, restoration, management, maintenance and monitoring plans shall be developed by a qualified botanist and/or resource specialist and shall be reviewed and approved by the California Department of Fish and Game.

Policy H-1	Future development of Airport property and/or facilities within the "Major Public and Institutional Land Use Designation" shall not result in adverse impacts to the wetland habitats of the Goleta Slough, related stream tributaries, or sensitive habitat areas due to additional sedimentation, runoff, or other disturbances.

Source: City of Santa Barbara, 2003. *Coastal Plan: Airport and Goleta Slough*, as amended and certified by the California Coastal Commission, May.

PRC = California Public Resources Code

Guide to the Southern California Marine Protected Areas - Point Conception to California-Mexico Border

Under the State's *Marine Life Protection Act of 1999*, there are several general rules that apply to all MPAs, including rules regarding access, anchoring, transit and drifting, introducing species, feeding fish, and public safety. Permitted/Prohibited uses specific to the Goleta Slough State Marine Conservation Area are as follows (CDFG 2012):

- Take of all living marine resources is prohibited except for take pursuant to activities authorized under subsection 632(b)(78)(D).

- In waters below the mean high tide line inside the Goleta Slough Ecological Reserve as defined within Section 630, the following restrictions apply:

  1. Boating, swimming, wading, and diving are prohibited.

  2. No person shall enter this area and remain therein except on established trails, paths or other designated areas except Department employees or designated employees of Santa Barbara Airport, City of Santa Barbara, Goleta Sanitary District and Goleta Valley Vector Control District for the purposes of carrying out official duties.

- Routine maintenance, dredging, habitat restoration, research and education, maintenance of artificial structures, and operation and maintenance of existing facilities in the conservation area is allowed pursuant to any required Federal, State and local permits, or activities pursuant to Section 630, or as otherwise authorized by the Department.

Goleta Slough Area Sea Level Rise and Management Plan

The GSMC was formed in 1991 to help work cooperatively between the many regulatory agencies, property owners, and special interest groups "to provide for a healthy Goleta Slough ecosystem irrespective of jurisdictional or other boundaries" (GSMC 2015). The Slough Management Plan (2015) provides a comprehensive update of previous Goleta Slough management plans and includes a sea level rise vulnerability analysis, which is hereby incorporated by reference (see http://www.goletaslough.org/committee/2016-goleta-slough-management-plan/). It contains detailed discussion of existing conditions within the Slough and the entire 2,250-acre Slough

Management Plan area, which encompasses developed areas such as the Airport, the Goleta Sanitary District plant, the Goleta West Sanitary District plant, and multi-family residential, commercial, and industrial development within the City of Goleta, the County of Santa Barbara, and the University of California at Santa Barbara (UCSB). Prepared on behalf of the GSMC, the Slough Management Plan synthesizes available information related to historic and existing conditions and discusses current and future anticipated challenges.

Goals within the Slough Management Plan focus on four over-arching ideas:

- Administrative Framework (Goal A) – Provide an administrative framework for the adoption, implementation and periodic updates of the *Goleta Slough Ecosystem Management Plan* (GSEMP) (i.e., the Slough Management Plan) through cooperative interaction between landowners, public interest groups, responsible agencies and jurisdictions. Consider the evolution of habitats, adaptive management and other changes that are likely to occur over time, including those related to climate change. Compatibility with surrounding land uses must also be considered in the review of plans and projects.

- Protection and Maintenance of Existing Resources, Functions and Values (Goal P) – Protect and maintain the natural diversity and resilience of species, habitat types and ecosystem functions through protection of physical processes that naturally maintain these resources. More deliberate adaptation actions may be necessary as sea level rise accelerates and other climate change impacts become more apparent. These adaptation strategies, when implemented, should, to the maximum extent feasible, avoid further alteration of habitats or physical processes.

- Restoration and Enhancement of Historic Resources, Functions and Values (Goal R) – To the maximum extent possible, enhance and restore the Slough's natural diversity of resources, habitats, physical processes, and functions that have been lost or degraded and that are needed to maintain the resilience of the Slough in the light of climate change.

- Education and Research (Goal E) – Increase the understanding and awareness of the Goleta Slough Ecosystem and its historic and future functions and values, through providing inventories of resources and supporting research and monitoring to inform decision makers and the public.

Recommended policies include: avoidance of wetland and upland resources whenever possible (Policy P-1); managing the Goleta Slough mouth to maintain optimal tidal circulation, water quality, and diversity and resilience of species and habitats (Policy P-2); managing sedimentation from the watershed into tidal marshlands and flats of the Slough compatible with flood protection for the Airport and other potentially affected landowners (Policy P-4); allowing accretion to occur within wetlands to counteract sea level rise (Policy P-5) (GSMC 2015).

The Slough Management Plan also includes numerous policies aimed at restoration efforts within the Slough. These policies reflect the conclusions of the sea level rise portion of the Plan, which provides a summary of projections of climate change for Goleta Slough and the impacts it may

have on the natural ecosystem and the built environment. In addition to the projected sea level rise, the future management of the Slough mouth will have a "very significant impact on future water levels and have a large effect on the distribution of habitats and species within the Slough" (GSMC 2015). The GSMC encourages local jurisdictions to consider the goals and the policies contained in the Slough Management Plan as they update their LCPs and undertake new studies in the Goleta Slough area.

Santa Barbara Municipal Airport Wildlife Hazard Management Plan

The Airport's WHMP has recently been updated based on a 2016 WHA (Dudek et al. 2016). The WHMP was approved by the FAA on February 27, 2017. **Table 4F** lists ongoing habitat management activities at the Airport. In addition, to these listed activities, the WHMP states that when replanting the airfield, plant species that minimize attractiveness to wildlife should be selected and that, whenever possible, mitigation should occur outside of the Airport's "Critical Zone," defined by AC 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports* (FAA 2007), as the area within a 10,000-foot radius (about two miles) of the Airport's Air Operations Area. The Airport is also required by FAA to seek permits and waivers to normal prescriptive policies should wildlife hazards become elevated (City of Santa Barbara 2017).

TABLE 4F
Ongoing Habitat Management Activity
Santa Barbara Airport

Monitor and improve drainage from runway, taxiway and safety areas that are found to impound storm water for extended periods.
Mow grass infield areas no lower than 6 inches where practical. Monitor bird activity during mowing operation so that flocking birds may be dispersed if necessary.
Mow infield areas prior to wet season to reduce cover availability throughout winter season.
Time mowing during plant growth cycle to minimize seed production, if possible.
Monitor and install exclusion barriers or anti-perching devices on Airport buildings that regularly attract wildlife.
Monitor and install anti-perching devices to attractive airfield structures to eliminate habitual perching opportunities.
Maintain, replace, and install bird deterrent spikes on airport signs and facilities located around the airfield, especially those located along runways and taxiways.
Work with FAA to install anti-perching devices on the ILS glide-slope antenna.
Maintain the airfield perimeter fence to discourage access to the airfield by large mammals.
Control rodent populations on the airfield to prevent attracting predators.
Limit the availability of trash which may become an attractant for scavengers and rodents.
Remove carcasses on the airfield which may become an attractant for scavengers.
Discourage hand feeding of birds and rodents.

Source: City of Santa Barbara 2017. *Santa Barbara Municipal Airport Wildlife Hazard Management Plan*, February 21; approved by FAA on February 27, 2017.

~~The Airport's Wildlife Hazard Management Plan (WHMP) was prepared in July 2008 as a draft pursuant to 14 CFR §139.337(e), in cooperation with the U.S. Department of Agriculture's Wildlife Services program. It will eventually be updated based on the recent WHA completed at the Airport (Appendix B). The 2008 WHMP includes both habitat management strategies and wildlife~~

hazard management procedures. **Table 4F** lists the WHMP's Habitat Management Implementation Schedule.

TABLE 4F
Habitat Management Implementation Schedule
Santa Barbara Airport

Activity	Timeline
Monitor and improve drainage from runway, taxiway and safety areas that are found to impound storm water for extended periods.	Ongoing
Mow grass infield areas no lower than 7 inches where practical.	Ongoing
Mow infield areas prior to wet season to reduce cover availability throughout winter season.	October 2008
Time mowing during plant growth cycle to minimize seed production, if possible.	Spring 2009
Monitor and install exclusion barriers or anti-perching devices on Airport buildings that regularly attract wildlife.	Ongoing
Monitor and install anti-perching devices to attractive airfield structures to eliminate habitual perching opportunities.	Ongoing
Maintain the airfield perimeter fence to discourage access to the airfield by large mammals.	Ongoing
Control rodent populations on the airfield to prevent attracting predators.	Ongoing
When replanting airfield areas, select plant species that minimize attractiveness to wildlife, if possible.	As needed – project specific
Limit the availability of trash which may become an attractant for scavengers and rodents.	Ongoing
Remove carcasses on the airfield which may become an attractant for scavengers.	Ongoing
Discourage hand feeding of birds and rodents.	Ongoing

Source: Santa Barbara Municipal Airport, WHMP (Draft), July 18, 2008.

In addition to habitat management activities, birds, large mammals, and other wildlife may sometimes need to be captured or removed. For example, rodents attract many types of predators that, if struck, may pose a threat to aircraft. If it is determined, based on monitoring, that an actual wildlife hazard exists, then Airport Patrol or Airport Operations staff takes direct action as soon as possible to resolve the situation. These control measures are selective and allow for positive identification of target animals. This reduces the impact on listed endangered or threatened species.

4.2.3 Impact Evaluation Methodology and Significance Criteria

Based on CEQA significance criteria adopted by the City, existing native wildlife and vegetation on a project site should be assessed to identify whether they constitute important biological resources, based on the types, amounts, and quality of the resources within the context of the larger ecological community. If important or sensitive biological resources exist, project effects on the resources are qualitatively evaluated to determine whether the project would substantially affect these important biological resources. Significant biological resource impacts

may potentially result from substantial disturbance to important wildlife and vegetation in the following ways:

- Elimination, substantial reduction or disruption of important natural vegetative communities, wildlife habitat, migration corridors, or habitats supporting sensitive species such as oak woodland, coastal strand, riparian, and wetlands.

- Substantial effect on a protected plant or animal species listed or otherwise identified or protected as endangered, threatened or rare.

- Substantial loss or damage to biologically important native trees such as oak or sycamore trees.

4.2.4 Project-Specific Impacts

Most of the development recommended by the proposed Master Plan would occur within the currently developed portion of the Airport. Biological resources in these areas of the Airport are minimal since they contain either impervious surfaces, such as buildings and pavement, or are vegetated with brome grasses that are regularly mowed, for example, around the runway/taxiway system. In addition, the acquisition of two avigation easements at the ends of Runway 33R and 15R would preclude future development of these two areas and would, therefore, reduce future impacts to wildlife or vegetation.

~~The following~~ One recommended development project (i.e., the Taxiway H Airfield Safety Project), however, could result in more substantial disturbance to important wildlife or vegetation, as defined in Section 4.2.3, primarily by disrupting potential wetlands, reducing the amount of uplands (i.e., grasslands and shrublands), and creating construction activity that could disturb protected birds.

Impacts to the Goleta Slough Ecological Reserve

Impact BIO-1: The proposed Master Plan recommends the extension of Taxiway H west to the Runway 7 threshold to provide safer access to the north side of the Airport (see Recirculated Draft Program EIR, Appendix A). This action would also involve the relocation of an existing glideslope antenna and the construction of two new connector taxiways. As shown in Exhibit 2D, the Taxiway H Airfield Safety Project and its related actions are likely to have direct impact on approximately 6.1 acres for construction of the taxiway pavement and shoulders and impacts to another 6.3 acres for grading within the taxiway object free area (TOFA). An estimated 12.4 acres of total disturbance would occur (does not include the removal of 1.14 acres of pavement where the taxiway would cross the existing apron). Approximately 11.2 acres of this area is located within the GSER.

As discussed in detail in Appendix C of the Draft Program EIR, vegetation within the Taxiway H disturbance area is annual brome grassland. This habitat type is composed primarily of non-native short to tall grasses and native and non-native broad-leaf forbs. In addition, noxious weeds may be present in disturbed areas. The Taxiway H project area is mowed in the fall and spring as part of the Airport's wildlife hazard management efforts. Although rodents and small mammals may use the area, overall, the wildlife hazard management practices are intended to suppress their presence; similarly, birds and larger mammals that might use the area for wildlife movement are also less likely to occur. The area is not likely to attract large numbers of reptiles and amphibians.

Depending on the amount of rainfall, however, this infield area may function as an intermittent wetland area. If this remains the case, the USACE and RWQCB ~~would likely~~may take jurisdiction and require permits under the CWA. Thus, potential impacts to biological resources from the Taxiway H Airfield Safety Project could include a loss of jurisdictional wetlands. This airfield safety project would also require additional development within the existing G-S-R zone and on land designated as Goleta Slough Natural Reserve in the City's General Plan, which are intended to protect biological resources of the GSER.

In addition, the Taxiway H Airfield Safety Project will remove upland areas that provide a buffer between the runway and Carneros Creek. The loss of upland, although disturbed through maintenance of the airfield environment, is also a potential impact to the Slough ecosystem.

Result BIO-1: **The current LCP contains mitigation that was established for previous airfield safety projects, including the construction of Taxiway M within the G-S-R zone. It is anticipated that a mitigation program similar to what is set forth in LCP policies C-11 and C-16 would be necessary to fully mitigate the Taxiway H Airfield Safety Project. However, a full analysis of this project's impacts on jurisdictional wetlands, loss of uplands, indirect impacts on the GSER, and consistency with the policies of the Airport's LCP cannot be undertaken until the project is actually proposed and the project's construction details are known. At that time, a thorough evaluation of the project under CEQA would be required, prior to the issuance of a CDP. See Section 4.6.4 for a discussion of the need for an LCP amendment/rezone/General Plan amendment.**

Section 4.2.7 contains a programmatic level mitigation program for the Taxiway H Airfield Safety Project. Although a detailed mitigation program cannot be developed until the design features and grading plan for the Taxiway H project are known, the programmatic mitigation program described would

meet the previously established mitigation standards of the LCP. Upon implementation of the mitigation program outlined in Section 4.2.7, project-specific impacts related to wetlands, uplands, and indirect impacts to the GSER would be Class II, Less than Significant Impact with Mitigation since the project would not result in the "elimination, substantial reduction, or disruption of important natural vegetative communities, wildlife habitat, migration corridors, or habitats supporting sensitive species…" after mitigation.

Impacts to Protected Birds

Impact BIO-2: Birds of prey such as red-tailed hawk and white-tailed kite, a California Fully Protected species, are encountered occasionally near the area proposed for the Taxiway H Airfield Safety Project area (based on a year-long survey between December 2014 and November 2016). However, implementation of the Airport's adopted WHMP requires the hazing of bird species within the runway and taxiway safety areas, in compliance with the FAA Manual "Wildlife Hazard Management at Airports (dated July 2005). A technical memorandum has been prepared to evaluate the potential for impacts to foraging habitat for the white-tailed kite, specifically from the future Taxiway H Airfield Safety Project (Final Program EIR, **Appendix C**). This project could involve the permanent loss of approximately 6.1 acres of Airport-maintained brome grass vegetation due to new pavement for the taxiway and shoulders.

The analysis concludes that although the brome grasses present at the proposed Taxiway H Airfield Safety Project site could provide potential foraging for kites, a lack of small mammals that serve as prey for kites (based on recent trapping efforts), a lack of kite activity in the area north of the runway (during a year-long survey effort), and the distance of the Taxiway H project site from known nest locations (Final Program EIR, **Appendix C**, **Figure 1**) indicate that the habitat is of low quality and is not essential for nesting white-tailed kites. The loss of 6.1 acres of this Airport-maintained, low-quality, foraging habitat is not considered significant. ~~Therefore, the area is not considered suitable foraging habitat for the white-tailed kite and direct impacts will not occur.~~

No suitable habitat for Belding's savannah sparrow (State endangered species) was identified within the runway and taxiway safety areas in recent surveys, including the Zembal et al. survey "A Survey of the Belding's Savannah Sparrow" (2010) with field work conducted by Mark Holmgren. Periodic surveys since the early 1990s have also not identified territorial or nesting Belding's savannah sparrows in this area, including extensive surveys by Holmgren and Burnell in 1992, Holmgren and Kisner in 1994, and published results of more recent surveys in 2001, 2006, 2010, and 2015 (Holmgren and Burnell 1992, Holgren and Kisner 1994, Zembal et al. 2015). However, there remains ~~a~~ the possibility of Belding's savannah sparrow use of the Taxiway H Airfield Safety

Project site. In addition, the Belding's savannah sparrow may be present in any of the proposed ~~restoration~~ biological mitigation areas. Therefore, the potential for impacts to this protected species exists.

As previously discussed, the least Bell's vireo is a Federal and State endangered bird that has occurred within willow habitat along Carneros Creek. ~~White-tailed kites and Cooper's hawk also have a slight potential to nest in this community.~~ Carneros Creek is located approximately 250 feet from the Taxiway H Airfield Safety Project area at its closest point. Construction activities in proximity to Carneros Creek and its associated ESHA will need to be closely monitored to ensure that indirect impacts related to noise, dust, or other deterrents to the nesting of ~~these~~ protected birds do not result.

Result BIO-2: **This project could involve the permanent loss of approximately 6.1 acres of Airport-maintained brome grass vegetation due to new pavement for the taxiway and shoulders. Although the brome grasses present at the proposed Taxiway H project site could provide potential foraging for kites, the habitat is of low quality and is not essential for nesting white-tailed kites. The loss of 6.1 acres of this Airport-maintained, low-quality, foraging habitat is not considered a project-specific impact (see also the discussion of cumulative impacts under BIO-4).**

Potentially significant direct impacts to the Belding's savannah sparrow (i.e., potential take) could ~~would~~ occur as a result of the Taxiway H Airfield Safety Project if this protected species is present during construction. This potential impact, as well as indirect noise impacts to nesting birds along Carneros Creek during construction, can be avoided through the avoidance of the breeding and nesting season and/or by maintaining suitable buffers. These direct and indirect impacts to protected birds are considered Class II, Less than Significant with Mitigation since the project would not result in a "substantial effect on a protected plant or animal species listed or otherwise identified or protected as endangered, threatened, or rare" after mitigation.

Impacts to Adjacent Creeks

Impact BIO-3: Several creeks border the north side development areas of the Master Plan. Carneros and Tecolotito Creeks border the northwestern and western corner, while San Pedro Creek forms the eastern boundary. The Taxiway H Airfield Safety Project area is in proximity to Carneros Creek. This creek contains ESHA (i.e., riparian scrub, wetlands, and open water) and is potential habitat for tidewater gobies and steelhead. Tidewater goby is a Federal endangered species and a CSC and is known to occur within the creek channel; steelhead of the southern California DPS is also a Federal endangered species and a CSC. It is not known to occur in Tecolotito or Carneros Creeks, but suitable spawning

habitat is present upstream and regular monitoring of the creeks for steelhead has not occurred. Therefore, uncontrolled storm water runoff containing sedimentation or pollutants could have adverse effects on these protected fish within the creek waters. However, all ground disturbance for the Taxiway H project would occur at least 250 feet from the creek.

Significant indirect impacts to Tecolotito and Carneros Creeks as a result of construction activity related to the Taxiway H Airfield Safety Project can be avoided through strict adherence to conditions of the project's General Construction permit, issued by the Central Coast RWQCB, as well as any conditions related to applicable LCP policies through the CDP process.

No impacts to San Pedro Creek are anticipated. The closest recommended Master Plan development is a proposed maintenance yard that would be located approximately 300 feet from the San Pedro Creek riparian area and is separated from the creek by both Taxiway D and East Verhelle Road.

The Master Plan's Facility Requirements chapter (Chapter 4, Table 4L) also identifies the Airport's fuel storage requirements, based on a 2-week supply. Based on this analysis, the Airport may need an additional 66,200 gallons of Jet A fuel storage capacity by the long-term planning period. Accordingly, the Master Plan recommends that the additional storage, if needed, be accommodated at the Airport's existing fuel farm, although this future project is not listed in the Airport's Capital Improvement Plan. The existing fuel farm is located over 500 feet from the creek.

The Airport implements both the City of Santa Barbara's Storm Water Management Plan (SWMP) and an airport-specific storm water pollution prevention plan (SWPPP), approved by the Central Coast RWQCB. All future north side development will be subject to the provisions of the SWMP, SWPPP, and permit conditions from RWQCB, as applicable. These measures will ensure that all planned development will meet the local and regulatory standards for storm water control.

Result BIO-3: **There is no construction activity planned in close proximity to creeks located on or near the Airport as a result of the Master Plan. In addition, through implementation of the City's and RWQCB's existing drainage and water quality requirements, all future projects at the Airport must be designed to comply with the City's requirements for storm water runoff and the City's SWMP requirements. The Airport has an existing SWPPP, dated September 2009, which also maintains compliance with the City's SWMP. The Airport's SWPPP, as well as project-specific conditions of each project's General Construction permit and/or CDP, would be enforced during all construction projects. Therefore, indirect impacts to protected species within Tecolotito, Carneros, and San Pedro Creeks are Class III, Less than Significant since Master**

Plan implementation would not result in a "substantial effect on a protected plant or animal species listed or otherwise identified or protected as endangered, threatened, or rare" within the creek environs.

4.2.5 Regional (Cumulative) Impacts

Impact BIO-4: To the extent that adverse impacts occur to the GSER, cumulative impacts would occur to a regional biological resource. According to the City's Final General Plan EIR (page 7-7), the Slough is one of four significant regional habitats in the Goleta Valley. Not only does it contain ESHAs protected by the Coastal Act and wetlands protected by the Coastal Act, CWA and the CFGC, but it supports sensitive species protected by the Federal ESA, the MBTA, the State ESA, the CFGC, and the *California Native Plant Protection Act*.

Existing transitional and upland habitats are also important in sustaining Slough functions and species diversity. While approximately 498 acres of suitable kite foraging habitat has been, or is anticipated to be, impacted in the region by past, present, or probable future projects (Final Program EIR, **Appendix C**, **Table 1**), there are over 4,500 acres of annual grasses and forbs within the cumulative study area (Final Program EIR, **Appendix C**, **Figure 2**). As previously discussed in **Impact BIO-2**, although the brome grasses present at the proposed Taxiway H Airfield Safety Project site could provide potential foraging for kites, a lack of small mammals that serve as prey for kites (based on recent trapping efforts), a lack of kite activity in the area north of the runway (during a year-long survey effort), and the distance of the Taxiway H project site from known nest locations (Final Program EIR, **Appendix C**, **Figure 1**) indicate that the habitat is of low quality and is not essential for nesting white-tailed kites. Relative to the amount of available kite foraging habitat in the region, the potential loss of 6.1 acres of low-quality foraging habitat (1.2 percent of anticipated lost acreage in region) if the Taxiway H Airfield Safety Project is constructed is considered Class III, Less than Significant on a cumulative level.

~~Potential~~ Other potential biological impacts of the proposed Master Plan would be tied to specific development projects recommended in the Master Plan as discussed above under Section 4.2.4 and would be subject to the Airport's LCP policies and CDP process. Similarly, other projects within the Slough Management Plan area are subject to their own LCP policies and CDP processes. The Slough Management Plan, in turn, provides additional goals to help protect the resources of the Slough.

The proposed Master Plan would be consistent with rules related to the southern California MPAs, and more specifically, the Goleta Slough State Marine Conservation Area, and would not preclude measures recommended in the

Slough Management Plan. (See Section 4.6.4 for a discussion of the need for an LCP amendment/rezone/General Plan amendment.)

Result BIO-4: **As discussed previously, most of the projects recommended within the proposed Master Plan would occur within the currently developed portion of the Airport where biological resources are minimal. As long as potential project-specific impacts to the Slough are adequately mitigated, cumulative biological impacts related to the project would be as well. As also discussed in Result BIO-1 for project-specific impacts, a programmatic mitigation program is provided as part of this Program EIR that would meet the previously established mitigation standards of the LCP. Upon implementation of the mitigation program outlined in Section 4.2.7, cumulative impacts to the Slough would be Class II, Less than Significant Impact with Mitigation since the project would not result in the "elimination, substantial reduction, or disruption of important natural vegetative communities, wildlife habitat, migration corridors, or habitats supporting sensitive species…" or a "substantial effect on a protected plant or animal species listed or otherwise identified or protected as endangered, threatened, or rare."**

4.2.6 Comparative Impacts of Alternatives

No Project Alternative

The No Project alternative would not result in impacts to the Slough or any other important wildlife and vegetation other than the restriction of wildlife movement in and out of the Slough due to the Airport's perimeter fence. The only projects that would occur as a result of this alternative would be general maintenance projects, which would be located within the developed portions of the Airport. Therefore, the No Project alternative would have less impact on biological resources than the project as proposed.

Environmentally Superior Alternative

The Environmentally Superior alternative would implement the Master Plan without the Taxiway H Airfield Safety Project. Therefore, impacts to potential wetlands within an intermittent wetland area and indirect impacts to the Slough, nearby creeks, and sensitive flora and fauna would be avoided. This alternative would have less impact on biological resources than the project as proposed.

4.2.7 Mitigation Measures

The City's Standard Conditions of Approval Applicable to Project for impacts to biological resources will be applied to all recommended projects under the proposed Master Plan, as appropriate. Other specific permit conditions may be applied to individual projects by the City as part of its CDP permitting process (see BIO/mm-2). In addition, additional permit conditions may be required by the RWQCB and USACE (if section 401 certifications or section 404 permits under the CWA are necessary).

No net loss of wetlands can occur as a result of the proposed Master Plan for its impacts to jurisdictional wetlands to be fully mitigated. For the Taxiway H Airfield Safety Project, it is anticipated that compensatory mitigation would be required since the area functions as potential wetland on an intermittent basis.

Mitigation Measures for Biological Resources Impacts BIO-1 and BIO-4

The following programmatic measures will be incorporated into the Mitigation Monitoring and Reporting Plan (Chapter Seven) for the proposed Master Plan. These measures would reduce potential project-specific and cumulative biological impacts to Class II, Less than Significant Impact with Mitigation at the programmatic level. Once project-specific details are known for the Taxiway H Airfield Safety Project, a project-specific mitigation program can be identified and required as part of the CDP process. Detailed descriptions of the proposed mitigation areas are provided in **Appendix D** of this Final Program EIR.

BIO/mm-1: Programmatic Mitigation Plan. This Programmatic Mitigation Plan is intended to provide a framework for future project-specific Habitat Mitigation and Monitoring Plan(s) (HMMPs) to provide compensatory mitigation for indirect and direct impacts to jurisdictional wetland habitat and established wetland and riparian setback/buffers from these protected habitats under this Program EIR. The HMMPs shall also address impacts to upland (i.e., grassland and shrubland) habitats, when appropriate. For example, under direction of this Programmatic Mitigation Plan, the Taxiway H Airfield Safety Project will be required to submit for regulatory agency (USACE, CDFW, CCC, and City, as appropriate) approval a project-specific HMMP for impacts to jurisdictional wetland and upland areas.

Future project-specific HMMPs must include the following requirements and information, as appropriate:

1. **Mitigation for wetland habitat and and/or wetland and/or riparian buffers shall be a minimum of 4:1 (restoration to impact) ratio and upland habitat (i.e., grassland and shrubland) shall be replaced at a 3:1 ratio in a form and location acceptable to the permitting regulatory agencies. Regulatory agencies may require a higher ratio depending on the habitat value and function that is proposed to be impacted.**

2. Habitat mitigation should occur on Airport property (onsite) in lands historically part of the Goleta Slough wetland complex and on wetland and upland areas currently mapped as disturbed or dominated by areas of non-native invasive plant species which would be reasonably expected to establish sustainable wetland, transitional, and upland habitat(s) to the extent feasible.
3. Any mitigation within the GSER shall be authorized by the CDFW and CCC under a LCP amendment.

4. The Airport shall solicit comments from the GSMC, a technical advisory committee for the GSER.

5. Focused biological surveys shall be conducted on potential mitigation area(s) within one year of approval of any future project-specific HMMPs. Depending on the amount of impacts to wetland and upland habitats, more than one mitigation area may require a biological survey. At minimum, the biological survey(s) shall consist of vegetation community mapping, floristic inventory, a wetland delineation and jurisdictional determination, and focused Belding's savannah sparrow surveys and raptor surveys, if suitable habitat exists for these species on the selected mitigation area(s). Additionally, each mitigation area shall be analyzed for physical habitat conditions including hydrology, salinity, and soil(s) by the appropriate technical specialists.

6. All sensitive biological resources shall be avoided in the design and during implementation and maintenance of future mitigation. Sensitive biological resources include, but are not limited to, occurrences of nesting Belding's savannah sparrow, southern tarplant, coulter's goldfield, meadow barley, creeping ryegrass, and other native grassland and native wetland habitat (Dudek 2012; Dudek 2012).

7. The Airport should comply with the conditions and recommendations of existing guiding documents to the extent feasible: LCP amendments, Slough Management Plan (GSMC 2015), and the Airport's current WHMP (City of Santa Barbara 2017).

8. The Airport shall assess the potential for an increase in wildlife hazards to airfield operations as described in the WHA (Dudek 2016) and the current WHMP (City of Santa Barbara 2017) with respect to the following criteria:

    a. Increasing the attractiveness of the Airport to hazard species or groups identified in the WHA/WHMP, as well as other species that may provide a hazard to aircraft. These include, but are not limited to, raptors, turkey vultures, gulls, waterfowl, pigeons and doves, flocks of blackbirds and European starlings, and coyotes.

b. Increasing the attractiveness of the Airport to any species covered under a valid Airport depredation permit.

c. Providing attractants to wildlife within 250 feet of a runway centerline.

d. Attracting threatened or endangered species, California fully protected species, or any species for which the Airport's ability to conduct wildlife hazard management activities (such as visual and acoustic hazing) may be limited.

e. Increasing rodent populations on the Airport.

f. Inundation of the airfield.

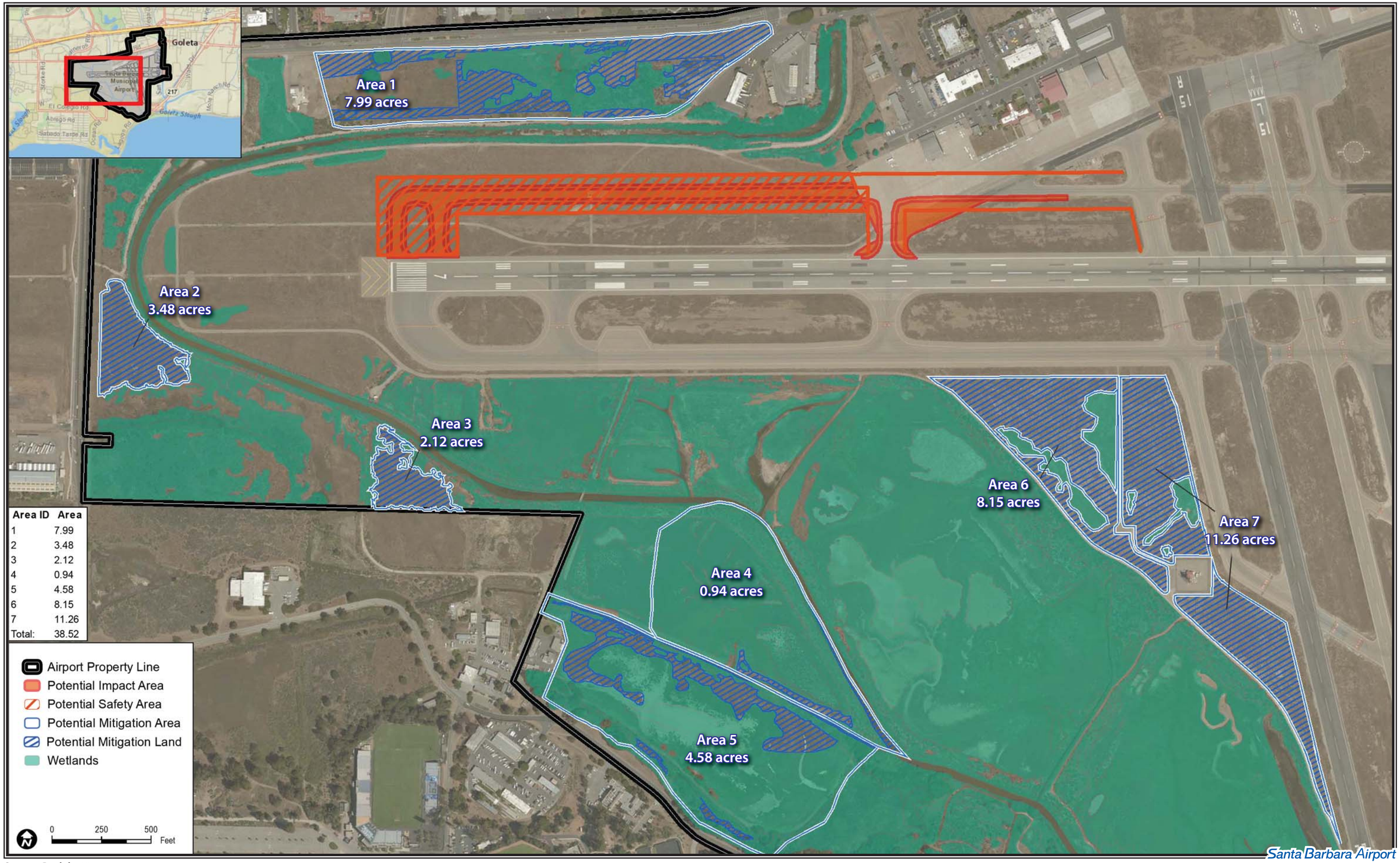
g. Increasing trees or shrubs in the airfield vicinity.

9. Restoration strategies shall be proposed that balance the criteria identified in BIO-1.1 through BIO-1.8 as well as agency requirements for wetland and upland restoration. Mitigation Areas 1 through 7 (as identified in Exhibit 4D) and potential restoration strategies have been considered in preparation of the Programmatic Mitigation Plan and shall continually be considered in project-specific HMMP(s). A summary of the mitigation areas, acreage available for mitigation, existing habitats, and potential restored and/or enhanced habitats are presented in Table 4G. Characteristics and restoration potential for each mitigation area are provided in Appendix D of this Program EIR.

10. As necessary due to sea level rise or other changes in future conditions within the Slough, adaptive restoration measures consistent with the recommendations of the Slough Management Plan shall be implemented.

11. The genetic origin of all native wetland and riparian propagules shall be from the Goleta Slough and for all native upland plants should be from the Goleta Valley. All wetland plants shall have a facultative, facultative wetland, or obligate wetland indictor status per the U.S. Army Corps of Engineers National List of Plant Species that Occur in Wetlands.

12. Restoration shall be phased to ensure that all restoration plantings are in place with sufficient irrigation prior to final inspection. Irrigation shall be reduced or eliminated after Year 2 depending on environmental conditions (i.e., drought may prolong irrigation). The wetland restoration shall be without supplemental irrigation for at least two years prior to final approvals. This could result in a maintenance and monitoring period greater than five years.



Source: Dudek 2017

REVISED

Exhibit 4D
PROPOSED BIOLOGICAL MITIGATION AREAS

TABLE 4G
Summary of Potential Mitigation Areas and Existing and Restored Vegetation Communities
Santa Barbara Airport

Mitigation Area	Mitigation Acreage Available	Existing Habitats [1, 2]	Potential Restored or Enhanced Habitats
1	7.99	- Emergent Wetland - Herbaceous Wetland - Grassland Wetland - Annual Grassland - Shrubland - Non-native Invasive	- Emergent Wetland - Transitional Wetland - Grassland Wetland - Native Grassland
2	3.48	- Annual Grassland	- Transitional Wetland - Native Grassland
3	2.12	- Emergent Wetland - Grassland Wetland - Annual Grassland	- Emergent Wetland - Transitional Wetland - Grassland Wetland - Native Grassland
4	0.94	- Emergent Wetland - Salt and Mudflats - Native Shrubland - Non-native Invasive	- Transitional Wetland - Native Shrubland
5	4.58	- Emergent Wetland - Salt and Mudflats - Native Shrubland - Non-native Invasive	- Emergent Wetland - Transitional Wetland - Grassland Wetland - Native Shrubland
6	8.15	- Emergent Wetland - Native Perennial Grassland - Non-native Annual Grassland	- Emergent Wetland - Transitional Wetland - Grassland Wetland - Native Grassland
7	11.26	- Emergent Wetland - Native Perennial Grassland - Non-native Annual Grassland	- Emergent Wetland - Transitional Wetland - Grassland Wetland - Native Grassland
Total Acreage	38.52		

SOURCE: Dudek 2017, Technical Memorandum to Andrew Bermond, City of Santa Barbara Airport Department, and Judi Krauss, Coffman Associates, June 5. (**Appendix D**, Final Program EIR)

[1] Dudek 2012. Wetland Inventory for the Santa Barbara Master Plan Update.
[2] California Coastal Act one-criterion definition of wetland.

13. Prior to commencement of development activities, the Airport shall file a performance bond with the City to complete restoration and maintain plantings for a five-year period.

14. The extent of development shall be restricted to those areas displayed on site grading plans to avoid additional impacts to wetland habitat and wetland and/or riparian buffers. Development boundaries shall be delineated (i.e., using wooden stake with highly visible environmentally-friendly paint) in the field prior to any ground-breaking activities.

15. Performance Criteria. Mitigation success for future project-specific HMMP(s) shall be determined, at minimum, by the following performance criteria:

- All installed plants must achieve a 70 percent survival rate by the end of the first year, and an 80 percent survival rate of the remaining plants by the end of the fifth year.

- Non-native invasive weeds must remain below 15 percent of the total vegetative cover at all times. Naturalized, non-invasive, non-native grasses are not included in this performance criterion.

- Native cover must be 75 percent after three years and 90 percent cover after five years.

- All container plants and seeded areas must survive without supplemental irrigation for a minimum of two years.

- No single species shall constitute more than 50 percent of the vegetative cover.

- No woody invasive species shall be present and herbaceous invasive species, excluding naturalized, non-invasive grasses, shall not exceed five percent cover after five years.

- Replacement plants shall be monitored for a minimum of three years to ensure successful establishment.

~~Programmatic Wetland Restoration Plan (PWRP). The PWRP is intended to provide a framework for future project-specific Habitat Mitigation and Monitoring Plans (HMMPs) to provide compensatory mitigation for indirect and direct impacts to jurisdictional wetland habitat and established wetland and riparian setback/buffers. The PWRP shall be consistent with all Airport operation and management policies, the *California Coastal Act* and Airport LCP, the Slough Management Plan, the CFGC, the CWA, and other plans and polices that regulate wetland habitat. Under direction of the PWRP, the Taxiway H Airfield Safety Project will be required to submit for regulatory agency (USACE, CDFW, CCC, and City, as appropriate) approval of a HMMP for impacts to jurisdictional areas.~~

~~Components of the PWRP shall include, at minimum, the following requirements and information:~~

~~1. Mitigation for wetland habitat and and/or wetland and/or riparian buffers shall be a minimum of 2:1 (restoration to impact) ratio. Agencies may require a higher ratio depending on the habitat value and function that is proposed to be impacted. Upland habitat shall be replaced at a 1:1 ratio in a form and location acceptable to the Goleta Slough Management Committee.~~

~~Wetland mitigation should occur on Santa Barbara Airport property (onsite) in lands historically part of the Goleta Slough wetland complex and on lands currently mapped as disturbed or dominated by non-native species which would be reasonably expected to establish sustainable wetland habitat.~~

~~The Airport shall comply with the conditions and recommendation of existing guiding documents as well as those under development (i.e., Wildlife Hazard Assessment for the Airport, LCP amendments, and the Slough Management Plan).~~

~~Restoration strategies shall be proposed that balance the criteria identified in Nos. 2 and 3 above, as well as agency requirements for wetland restoration. Mitigation Areas 1 through 4 (see below) and potential restoration strategies shall be considered in preparation of any project-specific HMMPs.~~

~~Table 4G and Exhibit 4D identify four potential mitigation areas where areas within or adjacent to the Slough could be restored to create replacement wetlands. Areas 1 and 2 are located southwest of Tecolotito Creek within the existing G-S-R zone; Areas 3 and 4 are located southwest of the intersection of the Airport's existing runway system within the existing A-F (Airfield Facilities) zone. As part of the mitigation effort, if selected, Mitigation Areas 3 and/or 4 would first be rezoned to G-S-R. Combined, the mitigation areas would provide an opportunity for almost 30 acres of new wetland.~~

~~The mitigation area(s) shall be selected in consultation with USACE, RWQCB, and CDFW, as appropriate. The areas would first be re-contoured, and then planted with a variety of short wetland vegetation. The desired plant composition shall be consistent with the Slough Management Plan, to the extent feasible, and compliant with Airport safety regulations (for example salt-grass or meadow barley as key components)[7] (as discussed further in No. 7).~~

~~TABLE 4G~~
~~Potential Onsite Wetland Mitigation Areas~~
~~Santa Barbara Airport~~

~~Area 1 (3.5 acres)~~
~~Mitigation Area 1 (3.5 acres) is located along the western portion of the Airport between Tecolotito Creek and Los Carneros Road (**Exhibit 4D**) within Subarea R of the CDFW Management Plan Area (City of Santa Barbara 1997). A slightly elevated shrub covered area forms the southern boundary. This "mound" is oval shaped and approximately half of it (as viewed from above) is positioned on Airport property. The other half is part of the Ecological~~

~~[7] Grass-dominated wetlands are not expected to greatly increase the wildlife hazard levels for aircraft utilizing the airfield system. Water-dependent birds attracted to ponded areas would generally not be drawn to wetlands dominated by perennial grass species. An exception might be Canada goose; however, all wetland mitigation areas proposed already provide open grassy areas that could potentially attract this species. Although the proposed wetland program has the potential to attract wildlife species hazardous to aircraft, overall this type of wetland has relatively low potential in comparison to other wetland habitats that support extensive ponding, perennial surface water, or tidal circulation.~~

~~Preserve on CDFW property also known as Western Goleta Slough. The nearest GSEMP Subarea Basin is 0.18 mile southeast of non-tidal basin R-2 (City of Santa Barbara 1997).~~

~~Mitigation Area 1 currently contains a field of non-native annual grasslands comprised primarily of Italian rye grass and annual brome grass. Native vegetation abuts the southern extent of the area including pickleweed and alkali heath, both plant species considered hydrophytic (USACE 2014). Historically, Mitigation Area 1 was believed to provide upland habitat within the Goleta Slough with a small area of palustrine located in the southwestern area (GSMC 1997). A greater coverage of palustrine habitat was located north of the area, historically, but is now dominated by invasive grasses and forbs (Harding grass and black mustard) and native shrub, coyote brush, on the elevated area near Los Carneros Road. Mitigation Area 1 is separated from Tecolotito Creek by an Airport road that follows the creek south and then as it bends west towards Los Carneros Road at the end of runway. Based on current conditions (vegetation) and historical wetland habitats, Mitigation Area 1 is ideal for creation of wetlands (the area north of the Airport road – not delineated – also could be considered for restoration). The area is separated from the airfield by Tecolotito Creek, which could limit travel of coyotes to and from the site and taxiways and runways where they pose safety concerns.~~

~~Two restoration strategies are available: grass-dominated wetlands (i.e., saltgrass, meadow barley, facultative [FAC] species) and emergent vegetation (herbaceous or emergent wetland). Grass-dominated wetlands would only meet 1- or 2-criteria wetland habitat.~~

~~Area 2~~
~~(2.2 acres)~~

~~Mitigation Area 2 (2.2 acres) is located in the southwest portion of the Airport property along its southern boundary which it shares with the Ecological Reserve on CDFW property (**Exhibit 4D**). Mitigation Area 2 is also within the Subarea R of the CDFW Management Plan Area (City of Santa Barbara 1997) and is approximately 0.25 mile southeast of Mitigation Area 1. Mitigation Area 2 is also within GSEMP's Study Area Basin R-2 designated as "Non-Tidal Basins that Impound Water." The slightly elevated shrub covered area is about 150 feet from the western boundary of the area separated by an Airport road that is no longer in use (historically part of the military installation). A channelized Tecolotito forms the northern boundary of the area. Mitigation Area 2 is over 400 feet from a taxiway safety area and even further from a runway and its safety area.~~

~~Mitigation Area 2 currently contains a field of non-native annual grasslands dominated by Italian rye grasses. Small patches of natural vegetation are found within the area including pickleweed, meadow barley, and alkali heath, all hydrophytic plants (USACE 2014). Historically, Mitigation Area 2 was believed to be palustrine-upland hybrid within the Goleta Slough (City of Santa Barbara 1997). Based on current conditions (vegetation) and historical wetland habitats, Mitigation Area 2 is ideal for creation of wetlands (the area north of the Airport road – not delineated – also should be considered for restoration). The area is separated from the airfield by Tecolotito Creek, which could limit travel of coyotes to and from the site and taxiways and runways where they pose safety concerns.~~

~~Two restoration strategies are available: grass-dominated wetlands (i.e., saltgrass, meadow barley, FAC species) and emergent vegetation (herbaceous or emergent wetland). Grass-dominated wetlands would only meet 1- or 2-criteria wetland habitat. The restoration of this area will not include grading to lower the entire site to become tidal wetland habitat.~~

~~Areas 3 and 4~~
~~(9.4 and 14.7 acres)~~

~~Mitigation Areas 3 (9.4 acres) and 4 (14.9 acres) are located directly south of taxiway safety area in the central to south-central portion of the Airport property south of Hollister Avenue. The taxiway and runway safety area are adjacent to Mitigation Area 4 to the east. An Airport road connecting a weather station separate Mitigation Area 3 (to the west) from 4 (to the east) (**Exhibit 4D**). Neither mitigation areas are within a Subarea of the CDFW Management Plan or Study Area Basin per the GSEMP (City of Santa Barbara 1997). Mitigation Area 4 currently contains a field of primarily non-native annual brome grasses with large patches of meadow barley and small patches of pickle weed and salt grass, all hydrophytic plants (USACE 2014). Historically, Mitigation Areas 3 and 4~~

were believed to be estuarine habitat of the Goleta Slough (City of Santa Barbara 1997). Based on current conditions (vegetation) and historical wetland habitats, Mitigation Areas 3 and 4 are ideal for creation of wetland habitat. There are no existing barriers between these two sites and the airfield.

Two restoration strategies are available: grass-dominated wetlands (i.e., saltgrass, meadow barley, FAC species) and emergent vegetation (herbaceous or emergent wetland). Grass-dominated wetlands would only meet 1- or 2-criteria wetland habitat. The restoration of Area 4 will not include grading to lower the entire site to become tidal wetland habitat.

Source: Dudek 2015. Technical Memorandum to Judi Krauss, Coffman Associates, January 23.

As necessary due to sea level rise or other changes in future conditions within the Slough, adaptive restoration measures consistent with the recommendations of the Slough Management Plan shall be implemented.

The genetic origin of all native wetland and riparian propagules shall be from the Goleta Slough. Wetland plants shall be, at a minimum, FAC species (i.e., equally likely to occur in wetlands [estimated probability 34 – 66 percent] or non-wetlands) per the USACE definition.

Restoration shall be phased to ensure that all restoration plantings are in place with sufficient irrigation prior to final inspection. Irrigation shall be reduced or eliminated after Year 2 depending on environmental conditions (i.e., drought may prolong irrigation). The wetland restoration shall be without supplemental irrigation for at least two years prior to final approvals. This could result in a maintenance and monitoring period greater than five years.

Prior to commencement of development activities, the Airport shall file a performance bond with the City to complete restoration and maintain plantings for a five-year period.

The extent of development shall be restricted to those areas displayed on site grading plans to avoid additional impacts to wetland habitat and wetland and/or riparian buffers. Development boundaries shall be delineated (i.e., using wooden stake with highly visible environmentally-friendly paint) in the field prior to any ground-breaking activities.

PWRP Timing and Approvals. The Airport shall submit the PWRP to the CCC for review and approval. The PWRP shall also be submitted to the USACE, CDFW, and RWQCB for their review; however, approvals are not required from these agencies. Future project-specific HMMPs will be reviewed and required as part of regulatory permitting (404/401, streambed alteration, etc.). For example, any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (and associated riparian resources, including salt marsh wetlands) of a river or stream may require a Lake and Streambed Alteration (LSA) agreement with the CDFW pursuant to Section 1602 of the CFGC.

BIO/mm-2: **During construction of the Taxiway H Airfield Safety Project, ~~all~~ applicable policies of the LCP shall be ~~required~~implemented, including but not limited to the following:**

- **A buffer strip of a minimum of 100 feet in width shall be maintained in a natural condition along the periphery of all wetland communities. Where development of an airfield safety project renders maintenance of the buffer infeasible, the City shall provide the maximum amount of buffer area feasible and all impacts to wetland habitat shall be mitigated to the maximum extent feasible such that no net loss of wetland habitat occurs (Policy C-4).**

- **Wetland areas temporarily affected by construction activities shall be restored to pre-construction conditions (Policy C-11).**

- **The project shall incorporate water quality BMPs or a combination of BMPs (per City guidance) that are best suited to reduce pollutant loading to the maximum extent feasible (Policy C-12).**

- **Special-status plant and wildlife protection measures shall be implemented (Policy C-15) (refer to BIO/mm-1).**

- **All construction, habitat mitigation and restoration plans, and special-status plant and wildlife mitigation and protection measures, shall be reviewed and approved by the regulatory agency/agencies having jurisdiction over the identified resource (Policy C-16).**

Mitigation Measures for Biological Resources Impact BIO-2

BIO/mm-3: **No construction shall occur during the avian breeding season (February 1-September 1) unless a survey from qualified biologist with experience in conducting breeding bird surveys finds that no bird breeding habitat exists within 300 feet of the disturbance area (500 feet for raptors) or can state with certainty that such habitat does not contain nesting birds. Project personnel, including contractors working on the site, shall be instructed on the sensitivity of the area. Reductions in nest buffer distance may be approved by the City's Community Development Department depending on the avian species involved, ambient levels of human activity, screening vegetation, or other factors.**

BIO/mm-4: **Taxiway H Airfield Safety Project and its habitat restoration project sites shall be monitored by a qualified biologist for Belding's savannah sparrow. Prior to site preparation and construction activities, the Airport shall have a qualified biologist survey all breeding/nesting habitat within the project site every seven days for eight consecutive weeks. Documentation of findings, including**

negative findings, shall be submitted to the CDFW. Site preparation and construction activities will only begin if no breeding/nesting birds are observed and concurrence has been received from CDFW. If breeding activities or an active nest is located in a work area, site preparation and construction activities shall not begin in that area until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and the young will no longer be impacted by the project.

Once site preparation and construction activities have commenced, the project site shall be monitored for Belding's savannah sparrow on a weekly basis. Documentation of findings, including negative findings, shall be submitted to CDFW until construction is complete.

Site preparation or construction activities shall be suspended immediately in a given area if the qualified biologist determines that breeding or nesting activity is occurring in that area. Site preparation and construction activities shall not resume until the monitor determines that the breeding and nesting activities described above have stopped.

Noise levels will be monitored by a qualified biologist to determine if construction activities are disruptive to Belding's savannah sparrow in or adjacent to the project site. If a significant disruption to foraging behavior is observed, construction activities in the area of disturbance will be stopped immediately until the qualified biologist develops recommendations to reduce or eliminate the disturbances ~~and~~ , receives concurrence from CDFW, and required measures are implemented.

4.3 CULTURAL RESOURCES

4.3.1 Environmental and Regulatory Setting

Prehistoric and Historic Context

The coastal area of Santa Barbara County, which includes the cities of Santa Barbara and Goleta, is located within the traditional territory of the Chumash Native Americans. Archaeological resources in the Santa Barbara/Goleta area include cave archaeology/rock art in the interior and middens (i.e., refuse piles) containing artifacts such as ornaments, tools, and shells along the coastal areas.

An influx of Spanish explorers and missionaries ushered in what is known as the Mission or Spanish Colonial/Mexican Period, ca. A.D. 1769-1830. El Pueblo Santa Barbara was established in 1769, followed by the construction of the Santa Barbara Presidio and Mission Santa Barbara several years later. Several local Chumash villages were mostly abandoned when the native people converted to Christianity and moved to Mission Santa Barbara. A local chapel, San Miguel Chapel,

was built just outside the Chumash village of *S'axplil* to provide additional access to Christian practices for the native population. The exact location of this chapel and community is unknown.

By the Rancho or Anglo-Mexican Period, ca. A.D. 1830-1870, California had become part of the Republic of Mexico and mission lands began to be confiscated by the Mexican government and then granted or sold for farming and ranching. Numerous ranchos, with a focus on cattle, were developed. In 1850, California became the thirty-first U.S. state. Eventually, a long period of drought forced a shift from ranching to farming and more commercial types of land uses. This marked the beginning of the American/Early Twentieth Century Period, ca. A.D. 1870-1940. In the Goleta area, changes included the establishment of a whaling camp at the mouth of the Goleta Slough, construction of Hollister Avenue, the Southern Pacific Railroad and the La Patera Train Station, and the operation of a lemon packing plant and a slaughter house.

In 1928 or 1929, a flying school was started near South Fairview and Hollister Avenues, which brought about the creation of the first airport in the early 1930s. Two hangars and two runways at the Airport date back to this original aeronautic land use (City of Santa Barbara 2002). The Modern Aviation Period began in 1941 and continues to the present. In 1941, the City of Santa Barbara voters approved a bond issue to complement Federal funding to build the new Santa Barbara Airport in Goleta Slough. The newly constructed Airport was first leased to the U.S. government and used as a World War II Marine Corps Air Station (MCAS). The Airport was returned to City control in 1949. A more comprehensive description of the history of the Airport is included in the historical structures report prepared for ~~this~~ the Draft Program EIR in Appendix E, Chapter 3, Historical Context.

Prehistoric Resources at the Airport

Cultural resources in the Goleta area, and especially in proximity to Goleta Slough, are numerous and include prehistoric and historic-era Native American sites as well as historic-era resources dating back to the late 1800s. Fifteen archaeological sites are recorded within or partially within Airport property; at least four of these sites have been determined to be eligible or appear to be eligible for listing on the National Register of Historic Places (NRHP) or the California Register of Historic Resources (CRHR). All four of these sites are considered to have moderate or high sensitivity to prehistoric resources and historic Native American values.

Historic Structures at the Airport

A previous inventory of all buildings and structures at the Airport found two buildings eligible for listing on the NRHP and 14 buildings eligible for collective designation as Structures of Merit (Triem and Stone 1995). However, recent versions of the City of Santa Barbara Landmarks (updated March 19, 2014), Structures of Merit (updated March 19, 2014), and Potential Historic Resources (updated July 29, 2014) designation lists only identify the General Western Hangars as Potential Historic Resources. The World War II buildings are not present on any of the City designation lists.

Major historic-era resources within the Airport property are described in a 2009 City document known as the *Master Archaeological Resources Assessment for the Santa Barbara Municipal Airport* (MARA). Although the Goleta area includes numerous resources from the historic-era periods described above, including the existing Terminal from the 1940s and two hangars from the 1930s, there are no historic-era resources at the Airport that are listed on the NRHP, the CRHR, or as California or City of Santa Barbara landmarks at this time (City of Santa Barbara 2009). The Terminal was reviewed for NRHP eligibility, but determined to be ineligible due to the number of alterations that have occurred to the building over its lifetime. The two hangars are eligible for NRHP listing, but have not yet been listed. These hangars are also listed as Potential Historical Resources for the City, but are not present on the Landmarks list.

Regulatory Setting

Federal

Determination of a project's environmental impact to historic and cultural resources under Federal law is made under guidance contained in the *National Historic Preservation Act of 1966* (NHPA) and the *Archaeological and Historic Preservation Act of 1974* (AHPA).

Section 106 of the NHPA, as amended, requires Federal agencies to take into account the effects of their undertakings on historic properties and determine if any properties in, or eligible for inclusion into, the NRHP are present in the area. According to the U.S. Department of Interior's National Park Service (NPS) Bulletin 15, *How to Apply National Register Eligibility Criteria* (2002), there are five property categories eligible for listing in the National Register. They are classified as buildings, structures, objects, sites, or districts.

In addition, the NHPA affords the Advisory Council on Historic Preservation a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is outlined in regulations issued by the Advisory Council. Its current regulations, *Protection on Historic Properties,* were amended on July 1, 2001 (36 CFR Part 800) and incorporate the statutory changes mandated by the 1992 amendments to the NHPA.

The AHPA describes the process that occurs when consultation with resource agencies indicate that there may be an impact on significant scientific, prehistoric, historic, archaeological, or paleontological resources. The process provides for the preparation of a professional resource survey of the area. Should the survey identify significant resources, the National Register process described above is followed.

State

California Public Resources Code (PRC) section 5024.1 requires evaluation of historical resources to determine their eligibility for listing in the CRHR. The purpose of the California Register is to maintain listings of the State's historical resources and to indicate which properties are to be protected from substantial adverse change. The California Register was consciously designed on

the model of the National Register; therefore, the two programs are extremely similar. The California Office of Historic Preservation (OHP) has adopted the NRHP resource categories (building, structure, object, site and district) as a basis for initial classification of California's historical resources. The Department of Parks and Recreation (DPR) 523 series forms, used to evaluate historical resources in California, are designed to follow these five National Register resource types as well.

In addition, S.B. 18 requires that local governments consult with California Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning. Although S.B. 18 does not specifically mention consultation or noticing requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for specific plans as they would general plans (see Government Code §65453) (OPR 2005:3). Since the proposed Master Plan is similar to a specific plan, but for an airport, it is likely that S.B. 18 would also apply to its adoption or amendment. The Governor's Office of Planning and Research (OPR) has published a *2005 Supplement to General Plan Guidelines* that provides step-by-step guidance to local governments on how and when to consult with tribes.

Local

As the proposed airport improvements will need permits from the City, the Master Plan must comply with both CEQA and the City Historic Structures Ordinance (*Municipal Code*, Chapter 22.22). The City Master Environmental Assessment (MEA) guidelines provide instruction on the organization of Historic Structures Reports, determining thresholds of significance, and completing impact assessments. According to the MEA, the Historic Structures Report must also comply with the requirements of CEQA.

In 2009, the MARA was prepared for the Airport with the intent of providing a consistent approach to the treatment of cultural resources in keeping with the City's previously approved MEA and its *Guidelines for Archaeological Resources and Historic Structures and Sites* (MEA-CR). The Airport's MARA is considered a tiered document from the MEA-CR that describes the programmatic procedures to be used when identifying, assessing, and managing archaeological resources that could be disturbed by activities occurring at the Airport. Archaeological sensitivity maps are also contained in the MARA and show the sensitivity zones for Native American and historical archaeological resources at the Airport property.

4.3.2 Applicable Plans and Policies

The Airport's approved LCP also contains several policies related to the preservation of cultural resources. Specifically, Policy F-3 addresses the need to protect known archaeological and other culturally sensitive resources from new development.

> Policy F-3. New development shall protect and preserve archaeological or other culturally sensitive resources from destruction, and shall minimize and, where feasible, avoid impacts

to such resources. “Archaeological or other culturally sensitive resources” include human remains, and archaeological, paleontological, or historic resources.

- Coastal Development Permits for new development within or adjacent to archaeologically or other culturally sensitive resources shall be conditioned upon the implementation of appropriate mitigation measures to minimize and, where feasible, avoid impacts to such resources.

- New development on or adjacent to sites with archaeologically or other culturally sensitive resources shall include on-site monitoring by a qualified archaeologist/s and appropriate Native American consultant/s of all grading, excavation and site preparation that involve earth-moving operations.

In addition, the City’s *Conservation Element*, Cultural and Historic Resources Policy 1.0, states: “Activities and development which could damage or destroy archaeological, historic, or architectural resources are to be avoided” (City of Santa Barbara 1994).

The City’s *Municipal Code*, Chapters 22.12, 22.22, and 22.68, also contain provisions for the protection of historical, archaeological, and cultural resources and establish an Architectural Board of Review for development projects (City of Santa Barbara 2009). Specifically, Chapter 22.22 is known as the City Historic Structures Ordinance.

4.3.3 Impact Evaluation Methodology and Significance Criteria

Archaeological and historical impacts are evaluated qualitatively by archaeologists and historians. First, existing conditions on a site are assessed to identify whether important or unique archaeological or historical resources exist, based on criteria specified in the State CEQA Guidelines and City Master Environmental Assessment *Guidelines for Archaeological Resources and Historical Structures and Sites*, summarized as follows:

- Contains information needed to answer important scientific research questions and whether or not there exists a demonstrable public interest in that information.

- Has a special and particular quality such as being the oldest of its type or the best available example of its type.

- Is directly associated with an important prehistoric or historic event or person.

If important archaeological or historic resources exist on the site, project changes are evaluated to determine whether they would substantially affect these important resources.

Impact Evaluation Methodology

A historic structures study was undertaken as part of this Program EIR to evaluate the eligibility of eight buildings that are over 50 years in age and are located within the Master Plan study area for listing on the NRHP, the CRHR, or on the City Landmark, Structure of Merit or Potential Historic Resources designation lists (Draft Program EIR, Appendix E). Four basic tasks were undertaken.

The first task involved background archival research to gather previous evaluations and available information on the development history of the property. This task also involved a review of City lists of designated historic structures. Second, an architectural historian visited the property to record the buildings and evaluate the significance of each building within the historic context. The significance and eligibility of eight buildings were then evaluated following the guidance provided in *Guidelines for Evaluating and Documenting Historic Aviation Properties* (Milbrooke et al. 1998). Finally, aspects of the proposed future development at the Airport were analyzed to determine whether they had the potential to cause an adverse change in the significance of historical resources considered eligible for listing on the NRHP, CRHR or a local register. As needed, mitigation measures were proposed.

Significance Criteria

The MEA utilizes criteria provided in the CEQA Guidelines, as well as other criteria found in City, State, and Federal regulations in determining whether a building, structure, object, or site is a significant historical resource (City of Santa Barbara 2002). The pertinent regulatory framework, as it applies to the proposed project, is summarized below and in the Draft Program EIR, Appendix E.

National Register of Historic Properties

36 CFR section 60.4 states that "the quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity" . . . and

(a) That are associated with events that have made a significant contribution to the broad patterns of our history; or

(b) That are associated with the lives of persons significant in our past; or

(c) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(d) That have yielded or may be likely to yield, information important in prehistory or history.

There are seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association (NPS 2002).

California Register of Historical Resources

Section 15064.5(a)(3) of the CEQA Guidelines states that a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (PRC section 5024.1; Title 14 California Code of Regulations [CCR] section 4852), including the following:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the significance criteria, the resource must retain enough of its historic character or appearance to be recognizable as a historical resource and to convey the reason for its significance (OHP 2014). Only after significance is fully established is the issue of integrity addressed.

City Landmarks and Structures of Merit

The criteria for evaluating significance of Historic Structures/Sites are found in the City *Master Environmental Assessment Guidelines for Archaeological Resources and Historic Structures and Sites* (City of Santa Barbara 2002). The City of Santa Barbara MEA defines significant historic resources to include, but not be limited to, the following:

1. Any structure, site or object designated on the most current version of the following lists:

    a. National Historic Landmarks
    b. National Register of Historic Places
    c. California Register of Historical Landmarks
    d. California Register of Historical Resources
    e. City of Santa Barbara Landmarks
    f. City of Santa Barbara Structures of Merit

2. Selected structures that are representative of particular architectural styles including vernacular as well as high styles, architectural styles that were popular fifty or more years

ago, or structures that are embodiments of outstanding attention to architectural design, detail, materials, or craftsmanship.

3. Any structure, site or object meeting any or all the criteria established for a City Landmark and a City Structure of Merit, as follows:

    a. Its character, interest or value as a significant part of the heritage of the City, the State, or the Nation;
    b. Its location as the site of a significant historic event;
    c. Its identification with a person of persons who significantly contributed to the culture and development of the City, the State, or the Nation;
    d. Its exemplification of a particular architectural style or way of life important to the City, the State, or the Nation;
    e. Its exemplification as the best remaining architectural type in its neighborhood;
    f. Its identification as the creation, design or work of a person or persons whose effort has significantly influenced the heritage of the City, the State, or the Nation;
    g. Its embodiment of elements demonstrating outstanding attention to architectural design, detail, materials, or craftsmanship;
    h. Its relationship to any other landmark if its preservation is essential to the integrity of that landmark;
    i. Its unique location or singular physical characteristic representing an established and familiar visual feature of a neighborhood;
    j. Its potential of yielding significant information of archaeological interest;
    k. Its integrity as a natural environment that strongly contributes to the well-being of the people of the City, the State, or the Nation [Santa Barbara Municipal Code 22.22.040].

4. Any structure, site or object meeting any or all the criteria provided for the National Register of Historic Places and the California Register of Historical Resources list.

5. Any structure, site, or object associated with a traditional way of life important to an ethnic, national, racial, or social group, or to the community at large; or illustrates the broad patterns of cultural, social, political, economic, or industrial history.

6. Any structure, site, or object that conveys an important sense of time and place, or contributes to the overall visual character of a neighborhood or district.

7. Any structure, site, or object able to yield information important to the community or is relevant to historical, historic archaeological, ethnographic, folkloric, or geographical research.

8. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the

lead agency's determination is supported by substantial evidence in light of the whole record [14 CCR chapter 3, section 15064.5(a)(3)].

4.3.4 Project-Specific Impacts

There are eight potentially historic buildings at the Airport, representing two different themes in the developmental history of the City, County, and Airport: early aviation (1928–1942) and World War II mobilization (1942–1946) (**Exhibit 4E**). A detailed description and analysis of each building based on architectural field surveys is presented in the Draft Program EIR, Appendix E, including photographs.

General Western Aero Corporation Hangars

These two airplane hangars, Buildings 248 and 249, were constructed together to support the General Western Aero Corporation when the company relocated its airplane factory to the fledgling Santa Barbara-Goleta Airport. The companion hangars, built alongside machine shops and an administration building, are located approximately 100 feet apart and are of the same design. None of the other buildings remain. As the hangars share a common history, the following significance evaluation summary considers both buildings together.

NRHP Criterion A through D. As the buildings retain historic integrity, the General Western hangars appear to be eligible for listing in the National Register under Criterion A for their association with events that have made a significant contribution to the broad patterns of aviation history. The period of significance is 1931–1942, covering the time the hangars served as an airplane factory, flying school, host to United Airlines, and contributor to the incremental development of aviation at the Santa Barbara Airport.

It does not appear that the General Western hangars are significant under National Register Criterion B, C, or D.

CRHR Criterion 1 through 4. Constructed in 1931, the hangars represent the first permanent buildings at the airport site. As discussed above and in detail in the Draft Program EIR, Appendix E, the subject hangars are associated with events that have made a significant contribution to the broad patterns of California aviation history and appear to be significant under CRHR Criterion 1.

The General Western hangars do not appear to be significant under CRHR Criterion 2, 3 or 4.

NRHP & CRHR Integrity Assessment. Although the setting of the General Western hangars has been altered, a historical contemporary would recognize the buildings as they exist today. Due to the loss of the associated administration building and the shifting of airport activities, the buildings suffer a moderate loss of integrity of setting, but overall the hangars retain good integrity of location, design, materials, workmanship, feeling, and association.

City of Santa Barbara Landmark Eligibility Evaluation. As the General Western hangars appear to be eligible for listing on the NRHP and CRHR, the hangars are also eligible for listing as City Landmarks under the following City Criteria:

3a. Its character, interest or value as a significant part of the heritage of the City, the State, or the Nation; and

3e. Its exemplification as the best remaining architectural type.

4. Any structure, site or object meeting any or all the criteria provided for the National Register of Historic Places and the California Historical Landmark list.

The General Western hangars are currently listed as Potential Historic Resources for the City.

Marine Corps Air Station Goleta Buildings

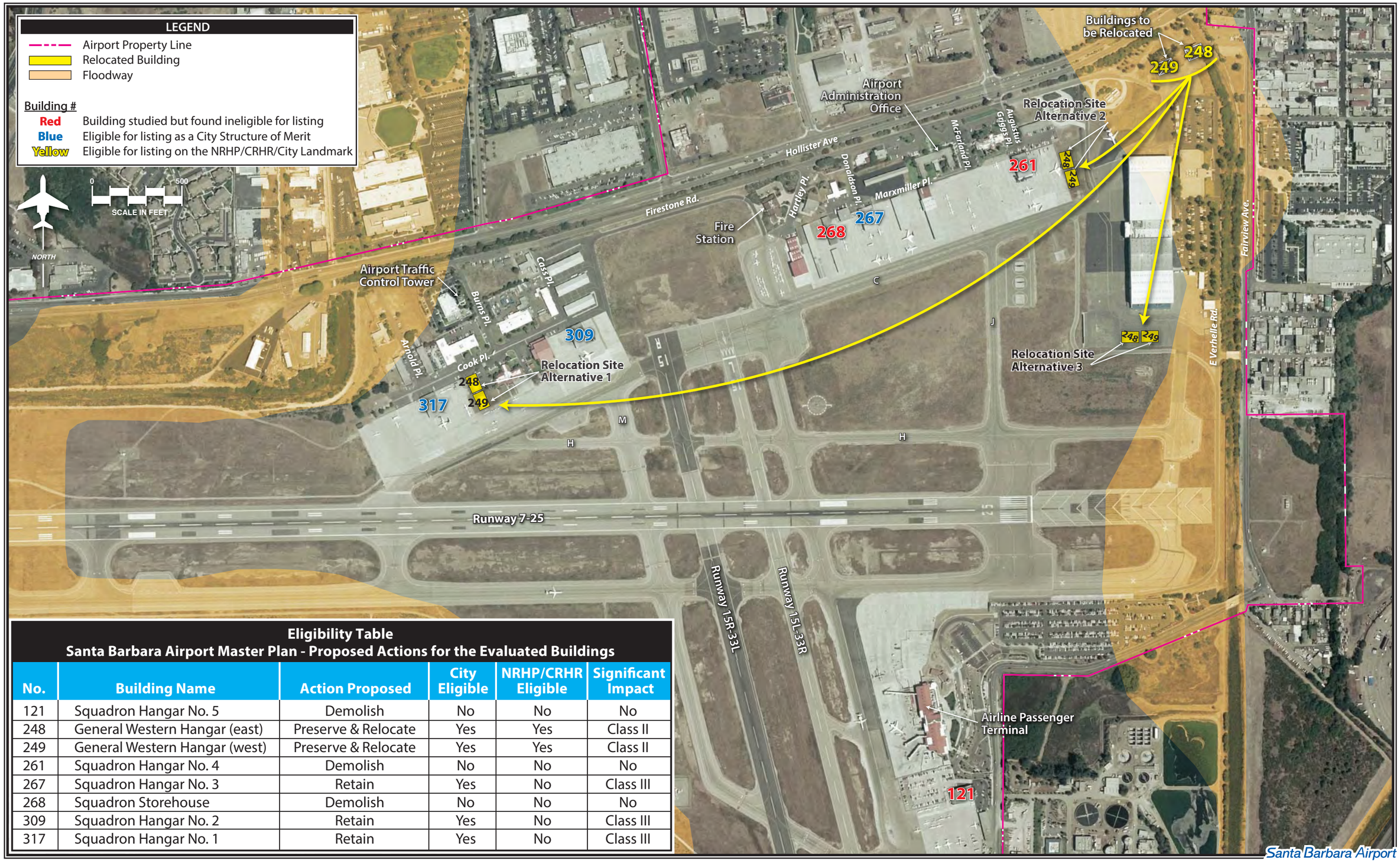
The subject MCAS squadron hangars (Buildings 261, 267, 309, and 317) and storehouse (Building 268) were completed under the initial construction contract for the MCAS in 1943. A fifth squadron hangar (Building 121) was completed under a second construction contract in 1944. As the MCAS hangars and storage building share a common history, the following significance evaluation summary considers the six buildings together.

NRHP Criterion A through D. Participation in World War II clearly represents a defining period in national history, and its economic, political, and social effects were far reaching, affecting every facet of American life. However, given the large number of properties associated with World War II and with the training of troops, not every associated property is necessarily historically significant. Although MCAS Goleta made important contributions to the war effort, the station does not appear to be directly involved with significant events associated with World War II. As such, the MCAS squadron hangars (Buildings 121, 261, 267, 309, and 317) and storehouse (Building 268) do not appear to be significant under National Register Criterion A.

During the five active years of MCAS Goleta, thousands of Marines worked and trained at the station. Fighter squadrons appear to have moved between bases to receive specialized training or for reorganization. At this time, it does not appear that any specific individuals can be identified as having achieved significance during their time at MCAS Goleta. As such, the MCAS squadron hangars (Buildings 121, 261, 267, 309, and 317) and storehouse (Building 268) do not appear to be significant under National Register Criterion B.

The subject hangars do not appear to represent an important example of their type. As such the MCAS squadron hangars (Buildings 121, 261, 267, 309, and 317) and storehouse (Building 268) do not appear to be significant for the National Register under Criterion C.

Although documentation of the subject hangar design was not located, documentation for several military-constructed *National Register Eligibility Evaluation of Eight Buildings at the Santa*



Eligibility Table
Santa Barbara Airport Master Plan - Proposed Actions for the Evaluated Buildings

No.	Building Name	Action Proposed	City Eligible	NRHP/CRHR Eligible	Significant Impact
121	Squadron Hangar No. 5	Demolish	No	No	No
248	General Western Hangar (east)	Preserve & Relocate	Yes	Yes	Class II
249	General Western Hangar (west)	Preserve & Relocate	Yes	Yes	Class II
261	Squadron Hangar No. 4	Demolish	No	No	No
267	Squadron Hangar No. 3	Retain	Yes	No	Class III
268	Squadron Storehouse	Demolish	No	No	No
309	Squadron Hangar No. 2	Retain	Yes	No	Class III
317	Squadron Hangar No. 1	Retain	Yes	No	Class III

Santa Barbara Airport

Exhibit 4E
PROPOSED PROJECT ACTIONS
AFFECTING HISTORIC STRUCTURES

Barbara Airport 53 World War II hangars are available for review at the Library of Congress. Many variations of airplane hangars share similar structural systems, clear-span interiors, door pockets, interior office space, and fenestration. Therefore, it does not appear that the MCAS squadron hangars (Buildings 121, 261, 267, 309, and 317) and storehouse (Building 268) would provide information that is not available by other means and as such do not appear to be significant under National Register Criterion D.

CRHR Criterion 1 through 4. Although MCAS Goleta made important contributions to the war effort, the station does not appear to be directly involved with significant events associated with World War II or with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. As such, the MCAS squadron hangars (Buildings 121, 261, 267, 309, and 317) and storehouse (Building 268) do not appear to be significant under CRHR Criterion 1.

The MCAS squadron hangars (Buildings 121, 261, 267, 309, and 317) and storehouse (Building 268) also do not appear to be significant under CRHR Criterion 2, 3 or 4 for the same reasons that they are not significant under NRHP Criterion B through D. See previous discussion.

City of Santa Barbara Landmark/Structure of Merit Eligibility Evaluation. The MCAS squadron hangars and storehouse are eligible for listing as City Landmarks under the following City Criteria as discussed below:

2. The hangars are representative examples of the kind of Navy-designed buildings modified by contracted architects to shorten construction time and work with available building materials during the rapid construction of military installations during World War II. Due to alterations, the storehouse is not a good example of the architectural style. While the storehouse does not appear to be significant under City Criterion 2, the hangars do appear to be significant under City Criterion 2.

3a. The hangars and the storehouse are significant for their contributions to the continuing development of the Santa Barbara Airport. The MCAS Goleta buildings allowed the airport to continue operating and expand into new commercial uses after World War II without the need for new facilities, creating value as a significant part of the heritage of the City. The hangars and storehouse as a group appear to be significant under City Criterion 3a.

3d. The hangars are representative examples of the kind of Navy-designed buildings modified by contracted architects to shorten construction time and work with available building materials during the rapid construction of military installations during World War II. Due to alterations, the storehouse is not a good example of the architectural style. While the storehouse does not appear to be significant under City Criterion 3d, the hangars do appear to be significant under City Criterion 3d.

3e. The hangars are the only remaining examples of the modified World War II Navy-designed arched aircraft hangar in the city of Santa Barbara. The subject storehouse is not the best remaining example of its architectural type at the airport. While the storehouse does not

appear to be significant under City Criterion 3e, the hangars do appear to be significant under City Criterion 3e.

3i. The hangars are visible from almost every location on the airport property. The hangars represent an established and familiar visual feature of the airport. Surrounded by three modern hangars, the storehouse is mostly blocked from view and is not an established and familiar visual feature of the airport. While the storehouse does not appear to be significant under City Criterion 3i, the hangars do appear to be significant under City Criterion 3i.

5. The hangars and the storehouse illustrate the broad patterns of political and economic history through their contributions to the continuing development of the Santa Barbara Airport. The hangars and storehouse appear to be significant under City Criterion 5.

6. The hangars contribute to the overall visual character of the airport. The storehouse is mostly blocked from view and does not contribute to the overall visual character of the airport. While the storehouse does not appear to be significant under City Criterion 6, the hangars do appear to be significant under City Criterion 6.

8. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record (14 CCR 15064.5[a][3]). As the buildings appear to meet several criteria established in the MEA, the hangars and storehouse appear to be significant under City Criterion 8.

Integrity Assessment. Integrity of the MCAS squadron hangars and storehouse is assessed with reference to the seven aspects of integrity. Due to design alterations and loss of integrity of design, materials, feeling, and association, the MCAS Storehouse and Squadron Hangars No. 4 and No. 5 do not appear to retain sufficient integrity to convey their significance.

Although airport infill has minimally reduced integrity of setting, overall Squadron Hangars No. 1, No. 2, and No. 3 retain good integrity of location, design, materials, workmanship, feeling, and association and appear to be eligible for listing as Structures of Merit under City Criteria 2, 3a, 3d, 3e, 3i, 5, 6, and 8 for their contributions to the development of the airport and as examples of their architectural type. As such, Squadron Hangars No. 1, No. 2, and No. 3 (Buildings 317, 309, and 267) are historical resources for the purposes of CEQA.

Impact CR-1: The General Western hangars (Buildings 248 and 249) appear to be eligible for inclusion in the NRHP under Criterion A and CRHR under Criterion 1 for their association with events that have made a significant contribution to the broad patterns of aviation history. The hangars are also eligible for listing as City Landmarks for their architectural merits. As such Buildings 248 and 249 are historical resources for the purposes of CEQA.

The General Western hangars are located within the San Pedro Creek floodway. **Table 4H** identifies the various treatment options available to the City for the structures.

TABLE 4H
Historic Building Nos. 248 & 249 (General Western Hangars) Impacts and Mitigation
Santa Barbara Airport

Options	Potential Impact	Mitigation	Residual Impact
1. No Action Option: Leave buildings in floodway as is.	Adverse, due to "neglect of property that causes deterioration"		Class I, Significant Environmental Impact
2. Leave in Place Option: Leave buildings in floodway and restore.	Adverse, due to "neglect of property that causes deterioration"	1.Mothball and stabilize following NPS Preservation Brief 31; 2. Prepare management plan, which includes: - Nominate for NRHP; - Implement long-term flood protection; - Consult with interested parties to propose future uses and explore research/grant funding options. - Based on proposed uses, determine treatment plan to restore, preserve, or rehabilitate per Secretary of Interior standards.	Class II, Less than Significant Impact with Mitigation
3. Relocation Option: Leave buildings in floodway in the short term; relocate buildings outside of floodway in the long term.	Adverse, due to "neglect of property that causes deterioration;" Adverse, due to "removal of property from its historic location"	1.Mothball and stabilize following NPS Preservation Brief 31; 2. Prepare management plan, which includes: - Nominate for NRHP; - Seek approval to move hangars out of floodway to a location on the Airport that would preserve the integrity of the historic property; - Consult with interested parties to propose future uses and explore research/grant funding options. - Based on proposed uses, determine treatment plan to restore, preserve, or rehabilitate per Secretary of Interior standards. 3. Show relocation areas on "Development Concept Map" of proposed Master Plan.	Class II, Less than Significant Impact with Mitigation
4. Document and Demolish Option: Demolish buildings after documentation.	Adverse, due to "physical destruction of the buildings"	1.Conduct Level I documentation (per HABS/HAER standards). The documentation shall be packaged in archival materials and filed with the City of SB, SB Historical Museum Gledhill Library, and the Library of Congress. 2. Commemoration of the demolished hangars with an enclosed display on airport property, in a location easily accessible by the public.	Class I, Significant Environmental Impact (after mitigation)

Leaving the General Western hangars in the floodway without taking proper measures to protect them from flood events (Option 1) would result in Class I impacts to historic resources under the NHPA due to "neglect of property that causes deterioration." If the City were to leave the structures in the floodway, but attempt to restore them and protect them from future flood events (Option 2), the structures would remain unusable due to their hazardous location. Therefore, the Master Plan proposes to relocate the hangars out of the San Pedro Creek floodway (Option 3). This action itself would result in adverse impacts as well due to "removal of property from its historic location;" however, as discussed further below, a management plan would be implemented to mitigate the impact below a level of significance. Demolishing the buildings after documenting their history (Option 4) was originally considered, but dismissed due to its resultant Class I impact to historic resources (see Section 3.2 of this Program EIR).

Result CR-1: **The Master Plan proposes to pursue a management plan for the General Western Aero hangars that would mothball and stabilize the buildings in their existing location until such time as they can be relocated out of the floodway. Exhibit 4E shows three potential relocation sites within the general aviation area of the Airport. With proper mitigation, the impacts resulting from relocation of the buildings would be Class II, Less than Significant Impact with Mitigation.**

Impact CR-2: MCAS Squadron Hangars No. 1, No. 2, and No. 3 (Buildings 317, 309, and 267) appear to be eligible for listing as Structures of Merit for their contributions to the development of the airport and as the only examples of their architectural type in the city of Santa Barbara. As such, Buildings 317, 309, and 267 are historical resources for the purposes of CEQA.

The Master Plan proposes to retain all three buildings with Building 267 shown as a fixed base operator (FBO) expansion area (refer to Exhibits 2B and 2E). What this means is that the FBO lessee would have the option of expanding its lease area to include the building under the condition that it be maintained as a historic structure in keeping with its listing as a City Structure of Merit.

Result CR-2: **Since the proposed Master Plan would retain the three MCAS Squadron Hangars No. 1, No. 2, and No. 3 (Buildings 317, 309, and 267) considered eligible for listing as City of Santa Barbara Structures of Merit (Exhibit 4E), potential impacts to these buildings are considered Class III, Less than Significant Impact.**

Impact CR-3: Cultural resources in the Goleta area, and especially in proximity to Goleta Slough, are numerous and include prehistoric and historic-era Native American sites as well as historic-era resources dating back to the late 1800s. Fifteen archaeological sites are recorded within or partially within Airport property; at least four of these sites have been determined to be eligible or appear to be eligible for listing on the NRHP or the CRHR and are considered to have moderate or high sensitivity to prehistoric resources and historic Native American values. Twelve archaeological

sites have been recorded within 500 feet of the Airport; none are considered eligible for listing on the NRHP or CRHR at this time.

Overall, the improvements recommended within the Master Plan would not require the disturbance of archaeological sites that have been determined to be eligible or appear to be eligible for listing on the NRHP or CRHR. These sites have been mapped as "high" archaeological resources sensitivity zones on Figure 6-1 of the MARA (City of Santa Barbara 2009). There is one area of recommended future Terminal and apron expansion that is mapped as a "moderate" sensitivity zone.

There is no evidence that the site contains any human remains. Standard Conditions of Approval Applicable to Project include procedures for the unanticipated discovery of human remains.

Result CR-3: Proposed Master Plan projects located within a moderate sensitivity zone of the MARA could have project-specific or cumulative impacts on cultural resources protected by Federal, State or City laws and guidelines. These impacts would be Class II, Impact Less than Significant Impact with Mitigation.

4.3.5 Regional (Cumulative) Impacts

No regional (cumulative) impacts to cultural resources other than those discussed above under Section 4.3.4, Project-Specific Impacts would occur as a result of the proposed Master Plan. The Airport, as part of the City of Santa Barbara, follows the requirements and procedures of the City's MEA-CR and MARA, which provide for the treatment of the City's cultural resources in a comprehensive manner to avoid the occurrence of cumulative impacts.

4.3.6 Comparative Impacts of Alternatives

No Project Alternative

The No Project alternative would not require the removal of historic structures at the Airport. However, leaving Buildings 248 and 249 within the floodway of San Pedro Creek with no action taken to protect them from flood damage would result in significant impacts to these historic structures, which are eligible for listing on both the NRHP and the CRHR. The implementing regulations of NHPA Section 106 prescribe specific criteria for determining whether a project would adversely affect a historic property, as defined in 36 CFR 800.5. Among other conditions, an effect is considered adverse when prehistoric or historic archaeological sites, structures, or objects that are listed or eligible for listing in the National Register are subjected to physical destruction, damage to all or part of the property, or neglect of a property that causes its deterioration. Thus, impacts to these historic resources would be greater than those that would occur with project as proposed.

No impacts would occur to the MCAS Squadron Hangars No. 1, No. 2, and No. 3 (Buildings 317, 309, and 267) since these buildings would remain in their existing location under this alternative. Thus, impacts to these historic resources would be the same as the project as proposed.

No disturbance of "high" or "moderate" archaeological resources sensitivity zones (as defined by the City's MARA) since the only projects occurring under the No Project alternative would be general maintenance projects. Therefore, impacts to cultural resources under the No Project alternative would be less than the project as proposed.

Environmentally Superior Alternative

Under the Environmentally Superior alternative, the treatment of historic and other cultural resources would be the same as under the project as proposed. Therefore, impacts to these resources would be the same as the project as proposed.

4.3.7 Mitigation Measures

CR/mm-1: The following mitigation program shall be implemented to reduce potential impacts to the General Western hangars (Buildings 248 and 249) to Class II, Less than Significant Impact with Mitigation:

1. Mothball and stabilize following NPS Preservation Brief 31;

2. Prepare management plan, which includes:
- **Nominate for NRHP;**
- **Seek approval to move hangars out of floodway to a location on the Airport that would preserve the integrity of the historic property;**
- **Consult with interested parties to propose future uses and explore research/grant funding options;**
- **Based on proposed uses, determine treatment plan to restore, preserve, or rehabilitate per Secretary of Interior standards.**

3. Show relocation areas on "Development Concept Map" of proposed Master Plan.

CR/mm-2: All future projects under consideration within the Master Plan shall be evaluated based on the screening process set forth in the City's MARA. If a proposed project is located within a mapped moderate sensitivity zone, a determination shall be made by the City's Environmental Analyst regarding whether or not all proposed earth disturbance would be confined to areas of previous disturbance. The proposed project shall then follow the appropriate mitigation and reporting requirements provided in the MARA and in reports approved by the City's Environmental Analyst or Historic Landmarks Commission.

Native American consultation shall occur as each individual project is proposed and shall include, but not be limited to, ~~the~~ a current list of contacts provided by the Native American Heritage Commission. ~~in response to the environmental scoping process for this EIR.~~

CR/mm-3: The City's Standard Condition of Approval regarding "Unanticipated Archaeological Resources Contractor Notification" shall be implemented ~~as necessary~~for all projects.

4.4 GEOLOGY AND SOILS/HAZARDS AND HAZARDOUS MATERIALS

4.4.1 Environmental and Regulatory Setting

Geology and Soils

The entire Goleta Valley is located within a seismically active region. The north branch of the More Ranch fault is located approximately 1,000 feet south of the Airport, while other active faults, such as the offshore North Channel Slope fault (located in the Santa Barbara Channel) and the onshore Santa Ynez fault (located along the Santa Ynez Mountains), are located farther away. In addition, local fault systems include east-west trending faults across the south end of the Airport (City of Santa Barbara 2010). The Airport is mapped by the City as having high liquefaction potential because it is underlain by estuarine deposits and has a high-water table.

There are also potentially compressible soils at the Airport associated with the Goleta Slough (City of Santa Barbara 2002) and, although not typically occurring together, the Airport is mapped as having potential for soil expansion (clay soils with plasticity) (City of Santa Barbara 2010). The Airport is relatively flat and does not have a potential for significant landslides or substantial erosion; there are no sea cliffs located on the Airport.

Hazards

The Airport, which is situated on a coastal plain, is not located in an area susceptible to wildland fires. As discussed in Section 4.5.1, it is located in a City-designated tsunami hazard zone.

Hazardous Materials

Individual businesses located at the Airport are required to register all hazardous materials with the EPA as well as State and local regulatory agencies. Airport businesses also report to EPA regarding emissions related to hazardous materials. **Exhibit 4F** depicts the areas on the Airport that handle hazardous materials.

There are two Formerly Used Defense Sites (FUDS) hazardous material cleanups at the Airport currently in the State's Brownfields and Environmental Restoration Program. The first involves the MCAS Range Complex No. 1 MRS (Munitions Response Site), which had four sub-ranges: the Rifle Range, Skeet Range No. 1, Skeet Range No. 2, and the Free Gunnery Range. The site involves the following potential contaminants: explosives, lead, perchlorate, and munitions debris. The second has potential OE (ordnance and explosives)/UXO (unexploded ordnance) contamination. For further information, see reports (71000030 and 80000539) on the California Department of Toxic Substances Control's (DTSC) EnviroStor database (2014). Neither site is on the National Priorities List (NPL) nor are there any Federal Superfund sites at the Airport.

In July 1988, a FUDS study and subsequent removal activities identified 22 concrete underground fuel storage tanks (USTs) that had been part of the MCAS and were abandoned in place at various locations throughout the Airport. Investigation of the subsurface soils at tank removal locations found four locations with contamination and 18 locations with no contamination. Other operational components of MCAS that may have resulted in contamination include underground gasoline and fuel oil distribution systems, industrial buildings that handled contaminants such as polychlorinated biphenyls (PCBs) or lead-containing paint, aircraft accessory and maintenance shops, a sewage disposal, collection system and treatment plant, and a water treatment plant. However, extensive soil remediation has taken place at the Airport and there is currently no known soil or groundwater contamination. In addition, 13 buildings at the Airport have been assessed and treated for asbestos-containing material (ACM) (City of Santa Barbara 2002).

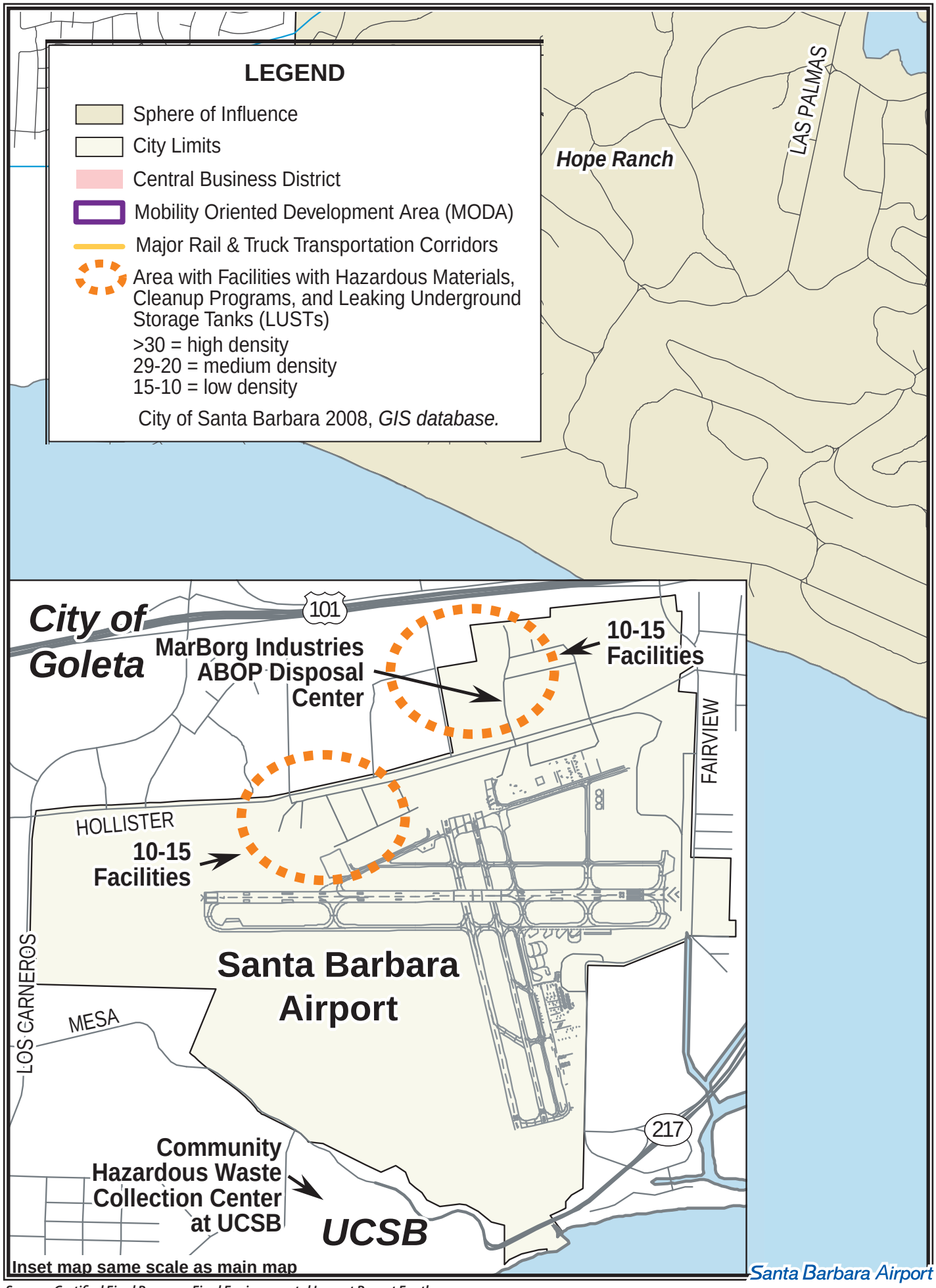
Regulatory Setting

Federal

No Federal regulations apply to geology and soils. For all airfield improvements, however, FAA engineers would have oversight over grading and construction design.

There are four primary Federal laws that have been passed governing the handling and disposal of hazardous materials, chemicals, substances, and wastes, all of which fall under the jurisdiction of the EPA. The two statutes of most importance to the FAA in proposing actions to construct and operate facilities and navigational aids are the *Resource Conservation Recovery Act* (RCRA) (as amended by the *Federal Facilities Compliance Act of 1992*) and the *Comprehensive Environmental Response, Compensation, Liability Act* (CERCLA), as amended (also known as Superfund). RCRA governs the generation, treatment, storage, and disposal of hazardous wastes. CERCLA provides for cleanup of any release of a hazardous substance (excluding petroleum) into the environment.

Other Federal laws include the *Hazardous Materials Transportation Act*, which regulates the handling and transport of hazardous materials and wastes, and the *Toxic Substances Control Act* (TSCA), which regulates and controls the use of PCBs as well as other chemicals and toxic substances in commercial use.



Source: *Certified Final Program Final Environmental Impact Report For the Plan Santa Barbara General Plan Update,* City of Santa Barbara 2010

Exhibit 4F
AREAS HANDLING HAZARDOUS MATERIALS

State

The *Alquist-Priolo Earthquake Fault Zoning Act* (Alquist-Priolo Act) (PRC section 2621 et seq.) was originally enacted in 1972 as the *Alquist-Priolo Special Studies Zones Act*, but was renamed in 1994. It is intended to reduce the risk to life and property from surface fault rupture during earthquakes. The Alquist-Priolo Act prohibits the location of most types of structures intended for human occupancy across the traces of active faults and strictly regulates construction in the corridors along active faults (earthquake fault zones). It also defines criteria for identifying active faults and establishes a process for reviewing building proposals in and adjacent to earthquake fault zones.

The *Seismic Hazards Mapping Act* (PRC sections 2690–2699.6) is also intended to reduce damage resulting from earthquakes. While the Alquist-Priolo Act addresses surface fault rupture, the *Seismic Hazards Mapping Act* addresses other earthquake-related hazards, including strong groundshaking, liquefaction, and seismically induced landslides. Its provisions are similar in concept to those of the Alquist-Priolo Act, i.e., the State is charged with identifying and mapping areas at risk of strong groundshaking, liquefaction, landslides and other corollary hazards, and cities and counties are required to regulate development within mapped seismic hazard zones. Under the *Seismic Hazards Mapping Act*, permit review is the primary mechanism for local regulation of development. Specifically, cities and counties are prohibited from issuing development permits for sites within seismic hazard zones until appropriate site-specific geologic and/or geotechnical investigations have been carried out and measures to reduce potential damage have been incorporated into the development plans.

California has also developed a set of hazardous waste regulations, including the *Hazardous Waste Control Law* (which is similar to RCRA). The State regulations are typically more stringent than their Federal counterparts (refer to 22 CCR chapter 30). The DTSC, which is a division of the California EPA, administers the State's hazardous waste program (including the UST laws) and implements the Federal program in California. Administrative responsibility is shared in part with regional and local agencies with jurisdiction over environmental and health issues, such as the RWQCB, Santa Barbara County's Health Services and APCD, and the City of Santa Barbara's Fire Department and Public Works Division.

Local

Soil conditions and earthwork activity are incorporated into a project's grading plans. The City's Engineer is typically responsible for ensuring that all grading plans meet acceptable regulatory standards and industry practices. (As discussed previously, FAA engineers would have oversight over grading, construction, and design of certain airport-related projects.)

Building standards, including those related to seismic activity, are generally incorporated into the local building permitting process. Rather than create and maintain their own codes, most states and local jurisdictions adopt the model building codes maintained by the International Code Council (ICC). The ICC publishes new editions of the International Codes every three years. Some provisions are intended to ensure that structures can adequately resist seismic forces during

earthquakes. These seismic provisions represent the best available guidance on how structures should be designed and constructed to limit seismic risk (FEMA 2014).

California's building codes (California Code of Regulations, Title 24) are also published on a triennial basis. The California Building Standards Commission (CBSC) is responsible for the administration and implementation of each code cycle, which includes the proposal, review and adoption processes. The July publication of the 2013 California Building Standards Code went into effect on January 1, 2014.[8]

4.4.2 Applicable Plans and Policies

There are two fuel farms located at the Airport. Both have approved spill prevention control and countermeasures (SPCC) plans and operations manuals. In addition, the following Standard Conditions of Approval Applicable to Project would apply to the demolition of any existing buildings at the Airport:

> Asbestos & Lead-Containing Materials. Pursuant to APCD Rule 1001, the applicant is required to complete and submit an Asbestos Demolition / Renovation Notification form for each regulated structure to be demolished or renovated. The completed notification shall be provided to the Santa Barbara County APCD with a minimum of 10 working-days advance notice prior to disturbing asbestos in a renovation or starting work on a demolition. Any abatement or removal of asbestos and lead-containing materials must be performed in accordance with applicable federal, State, and local regulations. Permits shall be obtained from the Air Pollution Control District prior to commencement of demolition of the structures containing asbestos and/or lead. Disposal of material containing asbestos and/or lead shall be sent to appropriate landfills that are certified to accept this material.

In addition, the *Santa Barbara General Plan* states the following:

> PS9. Hazardous Materials Exposure**.** Seek to provide facilities and guidance so that new development and redevelopment projects avoid exposure to hazardous materials and provide for their safe disposal.

4.4.3 Impact Evaluation Methodology and Significance Criteria

According to the City's CEQA significance criteria, potentially significant geophysical impacts may result from:

- Exposure of people or structures to risk of loss, injury, or death involving unstable earth conditions due to: seismic conditions (such as earthquake faulting, ground shaking, liquefaction, or seismic waves); landslides; sea cliff retreat; or expansive soils.

[8] http://www.bsc.ca.gov/, accessed June 2014.

- Exposure to or creation of unstable earth conditions due to geologic or soil conditions, such as landslides, settlement, or expansive, collapsible/compressible, or expansive soils.

- Substantial erosion of soils.

- Placement of a septic system in an area with soils not capable of adequately supporting disposal of waste water or where waste water could potentially cause unstable conditions or water quality problems.

Significant impacts related to hazards and hazardous materials may result from the following:

- Siting of incompatible projects in close proximity to existing sources of safety risk, such as pipelines, industrial processes, railroads, airports, etc.

- Exposure of project occupants or construction workers to unremediated soil or groundwater contamination.

- Exposure of persons or the environment to hazardous substances due to improper use, storage, or disposal of hazardous materials.

- Physical interference with an emergency evacuation or response plan.

- Siting of development in a high fire hazard area or beyond adequate emergency response time, with inadequate access or water pressure, or otherwise in a manner that creates a fire hazard.

4.4.4 Project-Specific Impacts

Impact G/HAZ-1: The Airport is located within a seismically-active area with local faults known to be present on-site; this is true of the entire region. In addition to fault rupture and ground shaking, the Airport has a high potential for liquefaction to occur on-site. Thus, future Master Plan development could be adversely affected by seismic activity.

Result G/HAZ-1: **Implementation of the Master Plan would not create unusual risks for people or structures related to seismic hazards and liquefaction. Industry-standard engineering practices are known and available to prevent most significant adverse impacts. These standards are implemented through City review and approval of project-related grading plans and building permits. As such, potential risks due to fault rupture, ground shaking, and liquefaction would be <u>Class II, Less than Significant Impact with Mitigation</u>.**

Impact G/HAZ-2: There are potentially compressible soils associated with Goleta Slough at the Airport; there is also potential for expansive soils at the Airport. Thus, future

Master Plan development could be adversely affected by adverse soil conditions.

Substantial soil erosion or loss of topsoil, however, is not anticipated as a result of Master Plan-recommended projects. The Airport is relatively flat and has an existing storm water pollution prevention plan (SWPPP) (dated September 2, 2009) and City Storm Water Management Program (SWMP) in place (see Sections 4.5.1 and 4.5.2).

Result G/HAZ-2: **Implementation of the Master Plan would not create unusual risks for people or structures related to soil conditions. Industry-standard engineering practices are known and available to compensate for soil compression and/or soil expansion through project design and construction. These standards are also implemented through City review and approval of project-related grading plans and building permits. As such, potential risks related to adverse soil conditions would be Class II, Less than Significant Impact with Mitigation.**

BMPs and sedimentation control measures would be required for all projects recommended by the Master Plan per the City's adopted SWMP and the Airport's RWQCB-approved SWPPP; potential impacts due to erosion would be Class III, Less than Significant Impact.

Impact G/HAZ-3: Future activity at the Airport could also involve the use, transport or disposal of hazardous materials. The use, transport or disposal of hazardous materials is heavily regulated. For example, the Airport already implements SPCC plans and operations manuals at both of its existing fuel farms. Individual businesses are required to register all hazardous materials with the EPA as well as State and local regulatory agencies.

Potential impacts to public safety due to reasonably foreseeable upset and accident conditions at the Airport are the responsibility primarily of FAA. Part of its statutory mission is to ensure the safe usage of navigable airspace and to provide for the safety of aircraft and airport operations. As a part of the Master Plan, the Airport will implement all safety areas and transitional zones required by the FAA, including the protection of its runway protection zones (RPZs). In fact, all of the proposed Master Plan airfield projects are safety-related actions.

The proposed Master Plan would not have an adverse effect on emergency evacuation and response measures in the area. No road closures in the surrounding area would be necessary as a result of development recommended by the Master Plan. The project site is located in an urban area where all public services are available. The Airport itself contains an aircraft rescue and firefighting (ARFF) facility, which is staffed by the City of Santa

Barbara Fire Department. In the event of an on-airport emergency, both the City and Santa Barbara County Fire Departments would respond, as necessary.

Result G/HAZ-3: **Potential risks of the routine handling or transport of hazardous materials or potential risks to public safety due to reasonably foreseeable upset and accident conditions related to the proposed Master Plan would be Class III, Less than Significant Impact. The use and transport of hazardous materials at the Airport is heavily regulated. In addition, FAA requires safety practices and zones on all airports, particularly those that provide scheduled commercial passenger service, i.e., Part 139-certified airports.**

Due to the emergency services already in place at the Airport, potential impacts to emergency evacuation and response plans as a result of the proposed Master Plan would also be Class III, Less than Significant Impact.

Impact G/HAZ-4: Although extensive remediation has occurred at the Airport and there is currently no known soil or groundwater contamination, there remains the potential for exposure of project occupants or construction workers to unremediated soil or groundwater contamination as Master Plan-recommended activity is undertaken.

Result G/HAZ-4: **Since the Airport is known to have contained leaking USTs, asbestos, and other contaminants, the potential for hazardous materials exposure remains, even though there is no known soil or groundwater contamination. The potential for impact would be Class II, Less than Significant Impact with Mitigation.**

4.4.5 Regional (Cumulative) Impacts

No regional or cumulative impacts to geology and soils or hazards and hazardous materials would occur as a result of Master Plan implementation. All of the projects recommended within the proposed Master Plan would occur within the currently developed portion of the Airport and would not have impacts outside of the Airport boundaries.

4.4.6 Comparative Impacts of Alternatives

No Project Alternative

The No Project alternative would have minimal risks related to geology and soils since the only construction that would occur under this alternative would be general maintenance projects for existing facilities at the Airport. A potential would still exist for hazardous materials exposure and, therefore, G/HAZ/mm-2 and 3 as discussed in Section 4.4.7 would still be recommended.

Overall, the No Project alternative would have less risk related to geologic activity, adverse soil conditions, and exposure to hazardous materials than the project as proposed.

Environmentally Superior Alternative

The Environmentally Superior alternative would have similar risks related to geologic activity, adverse soil conditions, and exposure to hazardous materials as the project as proposed since most of the development projects recommended in the Master Plan could still be constructed. The City's Standard Condition of Approval related to the asbestos and lead exposure, as discussed in Sections 4.4.2 and 4.4.7, would apply to the demolition of any existing buildings at the Airport. All mitigation identified in Section 4.4.7 should be applied to this alternative as well.

4.4.7 Mitigation Measures

The City's Standard Condition of Approval related to asbestos and lead exposure would apply to the demolition of any existing buildings at the Airport (see Section 4.4.2).

In addition, the following mitigation, as set forth in the proposed project's Initial Study, has been incorporated into the Mitigation Monitoring and Reporting Plan (Chapter Seven) for the proposed Master Plan. These measures would reduce potential geological risks, soil conditions, and hazardous materials impacts to a less than significant level and ensure project consistency with City General Plan policy PS9.

G/HAZ/mm-1: **The design and construction of load-bearing structures shall be subject to the recommendations of a site- and project-specific geotechnical investigation and/or engineering report. This mitigation is not necessary for minor development projects such as the installation of replacement fencing or aboveground storage tanks, unless required by the building permit.**

G/HAZ/mm-2: **A Construction Contingency Plan shall be developed that addresses methods to control potential migration of any contamination discovered during construction as well as safety practices for on-site construction personnel and the general public. Details of the plan shall include, but not be limited to:**

- **Soils monitoring for identification of contaminated soil during and after construction for all eroded and/or graded soils;**
- **Measures to be taken to protect workers and the public (such as fencing or hazard flagging, covering contaminated soil with plastic, etc.) and to prevent migration of contaminants to the surrounding environment;**
- **Notification procedures including, but not limited to, Santa Barbara County Environmental Health Services**

These Contingency Plans may be incorporated into the Construction Phase Erosion Control and Polluted Runoff Control Plans required per LCP Policy C-14 for projects requiring a CDP (see Section 4.5.2), if appropriate.

G/HAZ/mm-3: If contamination is discovered, a project-specific remediation plan shall be prepared and implemented per applicable regulations that reduces all contaminant concentrations to acceptable levels prior to the issuance of grading or building permits or, if already under construction, prior to resuming work.

4.5 HYDROLOGY AND WATER QUALITY

4.5.1 Environmental and Regulatory Setting

Water Resources and Quality

The Airport is located within the South Coast watershed, which drains the steeply sloping land of the Santa Ynez Mountains southwards towards the Pacific Ocean. An approximate 416-square mile area, the watershed is comprised of smaller watersheds associated with seven sub-drainages. Of these seven sub-drainages, three discharge directly into Goleta Slough on the Airport property: Tecolotito Creek, Carneros Creek, and San Pedro Creek/Las Vegas Creek. In addition, runoff from the adjacent bluffs of UCSB and More Mesa influences Goleta Slough. The watershed of the Goleta Slough itself is approximately 48 square miles (GSMC 2014).

The Airport's existing storm drainage system is comprised of surface swales, drainage inlets, concrete pipe, and outfall structures. Ponding occurs in various locations throughout the Airport, which is controlled by the tide and the creeks' water levels at the storm drainage outlets. The existing system drains ponded water after the creeks' water levels have receded. The Airport's storm water system drains primarily the Airport-owned watershed; most of the storm water inlets are located within the restricted access areas. Sources of storm water discharges to these inlets are generally limited to airfield tenant and Airport Department activities (City of Santa Barbara 2009). The creeks that flow through the Airport and into Goleta Slough, however, receive discharges from off the Airport, including nearby upstream residential, industrial, transportation, and agricultural land uses.

The EPA's CWA section 303(d) List of Impaired Waters (reporting year 2008) includes Goleta Slough and several of its tributary creeks.[9] In addition, the Goleta Slough/Estuary is on the State's 2010 CWA section 303(d) list of impaired waters for pathogens and toxic organics.[10] Urban runoff and other nonpoint sources contribute to the impairment. Carneros Creek is also on the State's list for salinity/total dissolved solids/chlorides/sulfates, pathogens, nutrients, and pH/acidity/caustic conditions; the Pacific Ocean at Goleta Beach is on the State's list for pathogens.

[9] http://watersgeo.epa.gov/mwm/, accessed June 2014.
[10] http://cfpub.epa.gov/surf/huc.cfm?huc_code=18060013, accessed June 2014.

Flooding and Inundation Hazards

The Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps (FIRMs) for the Goleta area show that the Airport is located within the 100-year floodplain (i.e., Special Flood Hazard Areas Subject to Inundation by the 1 Percent Annual Chance Flood). The Airport is located within Zone AE, which indicates that base flood elevations have been determined. The only portions of the Airport that are not located within the 100-year floodplain are sections of the Airport Industrial Area located north of Hollister Avenue.

In addition, several Floodway Areas have been mapped over portions of the Airport as they correspond to San Jose, San Pedro, Carneros, and Tecolotito Creeks. Floodway Areas are the channel of the stream, plus any adjacent area that must be kept free of encroachment so that the 1 percent annual chance flood can be carried without substantial increase in flood heights. **Exhibit 4G** shows the Floodway Areas that cross the Airport, as of December 4, 2012.[11]

The SBFCD conducts flood control maintenance activities at the Airport. Erosion, both natural and man-made, has caused sedimentation of the stream channels that drain into Goleta Slough. This siltation, as well as growth of vegetation, has led to the exacerbation of flooding during times of heavy runoff. Therefore, the SBFCD routinely dredges the streams to prevent and reduce the severity of local flooding. Both dragline desilting and hydraulic dredging methods have been utilized. An average of 105,000 cubic yards (cy) are removed per season (SBFCD 2010).

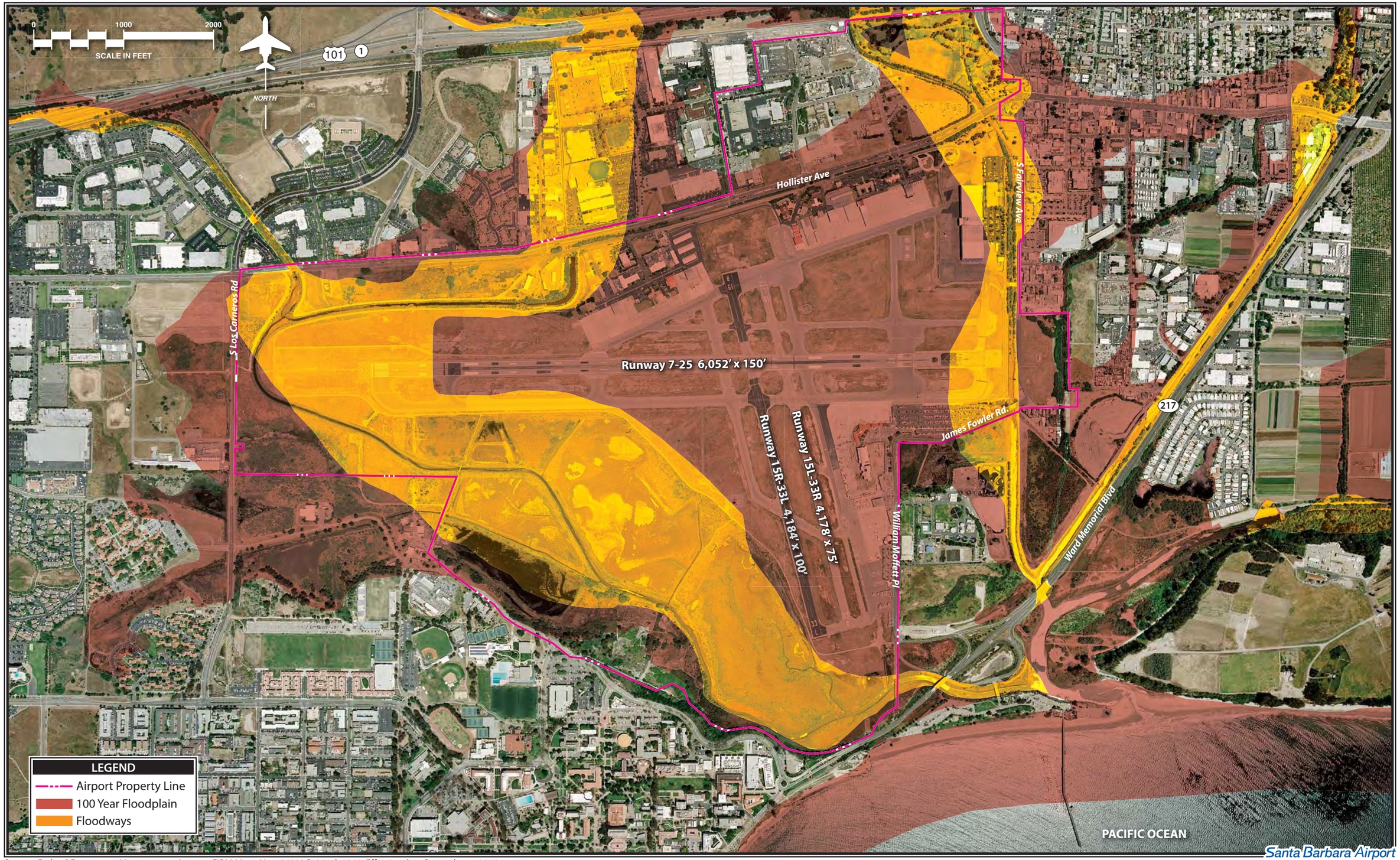
There have been two major flood events at Goleta Slough since the construction of the Airport in the late 1930s. The highest water levels in the Slough in modern times occurred in connection with a flood occurrence in 1969 and covered most of the airport runway, access roads, and parking lots. A second major flood event occurred in 1995, caused ponding on low-lying portions of the runways, and deposited a considerable amount of sediment on the runways and taxiways (GSMC 2014).

The Airport is not located in any known inundation hazard zones for substantial mud flows or seiche; it is, however, located in the tsunami hazard zone for the City. The City has evacuation plans for those parts of the City that could be affected should a threat such as a tsunami be anticipated.

Anticipated Future Sea Level Rise and Hydrological Changes in Goleta Slough

Climate change projections indicate that the Goleta Slough and airport property are likely to experience additional flooding due to sea level rise. To date, there has been no formal evaluation of the expected changes in the hydrology of the Goleta Slough watershed. However, the Slough Management Plan recommends adaptive strategies to accommodate at least five feet of sea level rise by the year 2100. In addition to an increase in mean sea level, changes in future wave conditions can also affect coastal water levels. According to the Slough Management Plan, a 2012

[11] This map does not fully reflect the re-routing of Carneros and Tecolotito Creeks around the end of Runway 7.



Source: Federal Emergency Management Agency, FIRM Maps Nos. 06083C1361 & 1362, Effective date December 4, 2012.

Santa Barbara Airport

Exhibit 4G

100-YEAR FLOODPLAIN & FLOODWAYS

Natural Research Council (NRC) report discusses a potential northward shift in the storm track affecting waves over the next century, while wave modeling efforts by the United States Geologic Survey (USGS) for the next Intergovernmental Panel on Climate Change (IPCC) report predicts a shift in wave direction by approximately 15 degrees south. The 2012 NRC report also indicates a potential decrease in precipitation for the Goleta Slough watershed, resulting in a corresponding decrease in watershed runoff over the next 100 years (GSMC 2015). The Slough Management Plan is incorporated by reference into this Recirculated Draft Program EIR (see http://www.go-letaslough.org/committee/2016-goleta-slough-management-plan/).

Based on the studies and research conducted in preparation of the Slough Management Plan, future climate change is expected to have the following three primary impacts on water levels within the Slough (GSMC 2015):

1. Increased ocean tide elevations will lead to elevated water levels within the Slough during periods when the Slough inlet is open.

2. Increased sea levels will increase the elevation of wave run-up, which will increase the potential size and elevation of the beach berm. Increased elevation of the beach berm may cause higher water levels within the Slough due to ponding when the inlet is closed. Ponded water levels may significantly exceed tidal water levels depending on overtopping of the berm and stream flows into the Slough. The height of the beach berm and, therefore, the height of ponding, will depend on the management of the beach and Slough inlet.

3. Even with five feet of sea level rise, fluvial flood events (i.e., produced by stream action) will continue to cause the most extreme water levels in areas of the Slough nearest to the upstream creek confluences. Fluvial flood levels near the Slough may increase as a result of future climate change, but was beyond the scope of the study. (As previously discussed, however, the 2012 NRC report predicts a decrease in watershed runoff).

Regulatory Setting

Federal

The CWA requires that each state regulate point and nonpoint sources of water pollution, including storm water discharges. The USACE and the EPA are the Federal agencies responsible for enforcing the CWA as listed below (see also Section 4.2.1 of this Final Program EIR):

- Section 401 requires certification for activities that result in discharge to the navigable Waters of the U.S., usually issued through a state or regional water quality control board;

- Section 402 authorizes the EPA to issue National Pollutant Discharge Elimination System (NPDES) permits to regulate discharges to Waters of the U.S.;

- Section 404 requires an USACE permit for any activity that results in the deposition or dredging of fill material within the "ordinary high water mark" (OHWM) of Waters of the U.S. (see also Federal *Rivers and Harbors Act*, section 10 [33 USC 403]).

E.O. 11988, *Floodplain Management*, directs Federal agencies to take actions to reduce the risk of flood loss, minimize the impacts of floods on human safety, health and welfare, and restore and preserve the natural and beneficial values served by floodplains. Department of Transportation (DOT) Order 5650.c, *Floodplain Management and Protection*, contains DOT policies and procedures for implementing E.O. 11988. Agencies are required to avoid, to the extent practicable, long- and short-term adverse impacts associated with modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative.

State/Regional Water Quality Control Boards

State water resources are also protected under the *Porter-Cologne Water Quality Control Act of 1967* (see Section 4.2.1). This Act establishes RWQCBs to oversee water quality on a day-to-day basis at the regional/local level. There are nine RWQCBs in California; Santa Barbara County is under the administration of the Central Coast RWQCB, located in San Luis Obispo. The applicable regional water quality control plan for the Santa Barbara/Goleta area is the 2011 *Water Quality Control Plan for the Central Coast Region* (Basin Plan). In addition, the State and its RWQCBs have been given the responsibility for administering permitted discharges into the coastal marine waters of the State under the adopted *California Ocean Plan* (2012).

The State of California and its RWQCBs work with the EPA to administer the NPDES permit program, including the regulation of storm water (CWA, section 402[p]). Municipalities with populations of less than 100,000 (such as Santa Barbara) are referred to as small municipal separate storm sewer systems (Small MS4s) and must comply with Phase II NPDES regulations. To receive a NPDES Small MS4 General Permit, such local governments must prepare and implement an approved SWMP.

Local

The City of Santa Barbara began implementing its SWMP in January of 2009. The SWMP addresses discharge of pollutants both during construction and after construction. The water quality treatment requirement is to retain and treat the 1-inch, 24-hour storm event. The peak runoff discharge rate requirement is that the peak runoff discharge rate shall not exceed the pre-development rate up to the 25-year storm. The volume reduction requirement is to retain on-site the volume difference between pre- and post-conditions for the 25-year, 24-hour storm, or the 1-inch storm (whichever is larger). The City's SWMP includes a separate chapter (Chapter 6.0) on the Airport as discussed below in Section 4.5.2.

The Airport itself operates under NPDES Industrial Activities Storm Water General Permit (CAS000001) and an RWQCB-approved SWPPP. The SWPPP contains a list of measures currently

in place to ensure that contamination to water quality does not occur. Activities occurring outside of the airfield security fence, however, are not covered by the Airport's NPDES permit or its SWPPP. Tenants of the Airport Industrial Area that require a storm water discharge permit must seek their own.

The City also has a Flood Plain Management chapter of its *Municipal Code* (Chapter 22.24). The chapter includes the establishment of a development permit for construction or development within any Special Flood Hazard Area, the conditions that need to be met for a variance, general standards for flood hazard reduction, and specific regulations related to floodways. Special Flood Hazard Areas include both mapped floodways and Zone AE, both of which occur at the Airport.

4.5.2 Applicable Plans and Policies

State/Regional

The California State Water Resources Control Board identifies beneficial uses of both inland and coastal waters in its Basin Plan for the Central Coast region (2011). Uses of the inland waters of Goleta Slough (for example, Carneros and Tecolotito Creeks) include: recreational uses, wildlife habitat, groundwater recharge, fishing and shellfish harvesting, municipal, agricultural and industrial water supply, and freshwater replenishment of Goleta Slough.

As discussed previously in Section 4.2.1, Goleta Slough itself is one of the few remaining coastal wetlands in California. Beneficial uses include recreation, wildlife habitat, and fishing and shellfish harvesting. As part of the mitigation for projects at the Airport, certain portions of Goleta Slough have been set aside for wetlands and other habitat restoration (see Section 4.2.2 and **Table 4E**).

Beneficial uses of coastal waters off Goleta Beach include recreation, industrial water supply, navigation, support of habitat for rare, threatened and endangered species, and shellfish harvesting.

Local

Policies of the *Santa Barbara General Plan* Environmental Resources Element address water quality issues as follows:

> ER15. Creek Resources and Water Quality. Encourage development and infrastructure that is consistent with City policies and programs for comprehensive watershed planning, creeks restoration, water quality protection, open space enhancement, storm water management, and public creek and water awareness programs.

ER16. Storm Water Management Policies. The City's Storm Water Management Program's policies, standards and other requirements for low impact development to reduce storm water run-off, volumes, rates, and water pollutants are hereby incorporated into the General Plan Environmental Resources Element.

ER17. Creek Setbacks, Protection, and Restoration. Protection and restoration of creeks and their riparian corridors is a priority for improving biological values, water quality, open space and flood control in conjunction with adaptation planning for climate change.

City Airport LCP policies C-5 and C-12 through C-14 are also related to water quality.

Policy C-5. Reduce the flow of sediment into the Slough to the minimum compatible with maintenance of the marshland.

Policy C-12. New development shall be sited and designed to protect water quality and minimize impacts to coastal waters by incorporating measures designed to ensure the following: protect areas that provide important water quality benefits, that are necessary to maintain riparian and aquatic biota and/or that are particularly susceptible to erosion and sediment loss; limit increase of impervious surfaces; limit disturbance of natural drainage features and vegetation; minimize, to the maximum extent feasible, the introduction of pollutants that may result in significant impacts from site runoff from impervious areas. New development shall incorporate BMPs or a combination of BMPs best suited to reduce pollutant loading to the maximum extent feasible.

Policy C-13. A Water Quality Management Plan (WQMP) shall be developed and implemented for new development or redevelopment projects that entail greater than or equal to one acre of disturbance. WQMPs shall be developed and implemented consistent with the most recent requirements of the RWQCB or Coastal Commission standards for controlling polluted runoff, whichever is more stringent. … (*See LCP for specific listed criteria.*)

Policy C-14. Construction Phase Erosion Control and Polluted Runoff Control Plans shall be developed for new development or redevelopment projects that require a CDP and a grading or building permit. These plans shall be implemented during the construction phase/phases of the project and shall include: … (*See LCP for complete list of requirements.*)

Policy H-1. Future development of Airport property and/or facilities within the "Major Public and Institutional Land Use Designation" shall not result in adverse impacts to the wetland habitats of the Goleta Slough, related stream tributaries, or sensitive habitat areas due to additional sedimentation, runoff, or other disturbances.

Chapter 6.0 of the City's SWMP functions as an Airport-specific SWMP. The Airport SWMP applies to both the airfield and the commercial/industrial areas of the Airport Industrial Area. The City's Airport Department is responsible for implementing, assessing, and reporting the effectiveness of the Airport SWMP as part of the City's annual report (City of Santa Barbara 2009). The Airport SWMP acknowledges that the Goleta Slough is a "Section 303(d) impaired" water and

addresses pollutants of concern through BMPs targeted specifically at those pollutants (i.e., metals, pathogens, priority organics, and sediment/siltation). These BMPs are the "minimum control measures" (MCMs) required by the City SWMP.

There are also two fuel farms located at the Airport. Both have approved SPCC plans and operations manuals. The Airport's SWPPP also contains a list of measures currently in place to manage potential hazardous materials at the Airport and to ensure that contamination to water quality does not occur. These measures apply to the aboveground fuel farms as well as to Airport activities and operators.

Goleta Slough Area Sea Level Rise and Management Plan

The Slough Management Plan recommends that current planning efforts identify adaptation strategies to accommodate at least five feet of sea level rise and is incorporated by reference into this Recirculated Draft Program EIR (see http://www.goletaslough.org/committee/2016-goleta-slough-management-plan/). Moderate sea level rise scenarios indicate that this is approximately the amount of sea level rise that is expected to occur by the year 2100. The Slough Management Plan assumes that Airport infrastructure would be protected in all scenarios and includes the following recommendation to raise the Airport runways and taxiways (GSMC 2015):

> "The 2010 Coastal LiDAR[12] shows that portions of the taxiways are located at elevations as low as 9.5' NAVD88[13] making them prone to flooding under existing closed Slough conditions. The runway low point is at 10.5 feet NAVD. Significant flooding of the runways and taxiways occurred during the 1969 and 1995 storm events. As sea levels rise the tarmac will flood more frequently, creating the potential for more frequent disruption of airport operations.
>
> One potential strategy for reducing the risk of flooding at the airport is to increase the elevation of the tarmac by applying thicker pavement lifts during the regular resurfacing of the runways, taxiways and safety areas. Applying thicker lifts of pavement at regular intervals over the lifetime of the airport may significantly reduce the potential for flooding on the tarmac. This adaptation strategy has considerable potential effectiveness for the near term, as it can be readily incorporated into regular airport capital improvement plans. This will also require the elevation of infield and overrun areas. The effectiveness of this strategy over the long term may be reduced due to increased ground settlement as the thickness and therefore the weight of paving increases." (GSMC 2015).

[12] LIDAR is an acronym for Light Detection and Ranging, a type of topographic data that was collected by the State for the purposes of studying potential sea level rise.

[13] NAVD88 is an acronym for North American Vertical Datum of 1988. NAVD 88 is the current standard reference datum in the United States for surveying and mapping activities performed or financed by the Federal Government.

4.5.3 Impact Evaluation Methodology and Significance Criteria

Based on the City's CEQA significance criteria, a significant impact to hydrology and water quality would result from:

Water Resources and Drainage

- Substantially changing the amount of surface water in any water body or the quantity of groundwater recharge.

- Substantially changing the drainage pattern or creating a substantially increased amount or rate of surface water runoff that would exceed the capacity of existing or planned drainage and storm water systems.

- Altering drainage patterns or affecting creeks in a way that would cause substantial erosion, siltation, on- or off-site flooding, or impacts to sensitive biological resources.

Water Quality

- Substantial discharge of sediment or pollutants into surface water or groundwater, or otherwise degrading water quality, including temperature, dissolved oxygen, or turbidity.

Flooding and Inundation Hazards

- Locating development within 100-year flood hazard areas; substantially altering the course or flow of flood waters or otherwise exposing people or property to substantial flood hazard.

- Exposing people or structures to substantial unmitigated risk involving inundation by seiche, tsunami, or mudflow.

4.5.4 Project-Specific Impacts

Drainage and Water Quality

Impact HYD-1: Future construction activity and impervious surfaces created by projects recommended in the Master Plan could result in drainage, storm water, and surface water quality impacts in Goleta Slough and other Section 303(d) impaired waters. For the most part, development would occur in areas of the Airport already covered by impervious surfaces, i.e., pavement and buildings. However, additional impervious surfaces would occur due to proposed shoulder improvements along Runway 15R-33L and Taxiways B and H (see Exhibit 2C,

Recommended Airfield Development Concept) as well as potential development of new fixed base operator (FBO) lease areas. In addition, approximately five acres of net new pavement is expected in conjunction with the recommended Taxiway H Airfield Safety Project (see Exhibit 2D, Proposed Taxiway H Extension).

There are four creeks that traverse the Airport property from north to south. The recommended development within the Master Plan does not involve the disturbance or alteration of any of the on-site creeks. The recommended Taxiway H Airfield Safety Project could involve grading and the placement of fill within 250 feet of Carneros Creek.

Result HYD-1: **As previously discussed in the Initial Study prepared on the proposed Master Plan and in Section 4.5.1 of this Program EIR, the City and State require that on-site capture, retention, and treatment of storm water be incorporated into the design of development projects. Pursuant to the City's SWMP and the NPDES General Permit for Storm Water Discharges, projects must be designed to capture and treat the calculated amount of runoff from the project site for a one-inch, 25-year storm event, over a 24-hour period.**

Therefore, at the planning level, potential drainage and water quality impacts would be Class III, Less than Significant Impact. Through implementation of the City's and RWQCB's existing drainage and water quality requirements, all future projects at the Airport must be designed to comply with the City's requirements for storm water runoff and the City's SWMP requirements. The Airport has an existing SWPPP, dated September 2009, which also maintains compliance with the City's SWMP. The Airport's SWPPP would be enforced during all construction projects.

Flooding and Inundation Hazards

Impact HYD-2: The proposed Master Plan recommends the removal of several existing structures from floodway areas. New development recommended by the Master Plan within the floodways is limited to the western 600 feet of the proposed Taxiway H Airfield Safety Project and most westerly taxiway connector with Runway 7, proposed shoulders on Taxiway D, perimeter fence improvements at the end of Runway 25, future use of existing buildings within the old maintenance yard, and potential expansion of one of the existing fuel farms. The remainder of the development recommended by the proposed Master Plan would occur within Zone AE, but outside mapped floodways (as mapped on FIRM maps, Panels 06083C1361G and 06083C1362G).

The risk to people and structures at the Airport due to flooding would be lessened by the recommended relocation of two historic hangars out of the floodway. Potentially significant impacts to people and structures could remain, however, due to the potential expansion of one of the fuel farms in the floodway, future use of existing buildings within the old maintenance yard, and due to future buildings located within Zone AE. The construction of a taxiway and connectors within the floodway could also have potentially significant impacts.

In addition, the Santa Barbara General Plan Safety Element projects that the region, including the Airport, will experience increased flooding attributable to changing climate and sea level rise over the useful life of projects recommended in the Master Plan. This is also the conclusion of a statewide study (see Section 4.1.1) and the Slough Management Plan. As previously discussed, the Slough Management Plan recommends that current planning efforts identify adaptation strategies to accommodate at least five feet of sea level rise since infrastructure constructed now may still be in use within the time that a sea level rise of five feet could occur.

Result HYD-2a: **The extent to which new Airport facilities within floodway or Zone AE (100-year floodplain) areas would impede or redirect flood flows cannot be fully determined until the design of the future structures is known and has been evaluated. However, all development projects at the Airport would be required to comply with Chapter 22.24, Flood Plain Management of the City *Municipal Code*. The chapter includes the establishment of a development permit for construction or development within any Special Flood Hazard Areas, the conditions that need to be met for a variance, general standards for flood hazard reduction, and specific regulations related to floodways. Therefore, flooding impacts of future development under the proposed Master Plan would be Class III, Less than Significant Impact.**

Result HYD-2b: **The removal of existing structures and land uses from the floodway would reduce existing flooding risks at the Airport. Thus, these aspects of the proposed Master Plan would be Class IV, Beneficial Impact.**

Result HYD-2c: **Based on recent CEQA case law, (i.e., *California Building Industry Association [CBIA] vs. Bay Area Air Quality Management District [BAAQMD] [2015])*, CEQA analysis "is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents" (CBIA, 62 Cal. 4th at 97). Therefore, no impacts related to sea level rise are attributable to the project. However, discussion of sea level rise has been retained for informational purposes and mitigation measures to aid in protecting Airport infrastructure from future flooding due to sea level rise is recommended.**

Impact HYD-3: Although the Airport is not located in any known inundation hazard zones for substantial mud flows or seiche, it is located in the tsunami hazard zone for the City. However, the proposed Master Plan would not result in substantial new growth at the Airport; rather, it contains plans for minor redevelopment of the Airport with an emphasis on improving the Airport's safety and efficiency.

Result HYD-3: **The City has evacuation plans for all parts of the City that would be affected should a threat such as a tsunami be anticipated. Based on these existing emergency procedures, inundation by tsunami is not considered to be a "substantial unmitigated risk," and impacts related to this significance threshold would be Class III, Less than Significant Impact.**

4.5.5 Regional (Cumulative) Impacts

No regional or cumulative impacts to drainage and water quality would occur as a result of Master Plan implementation. As discussed above, the City and State require that on-site capture, retention, and treatment of storm water be incorporated into the design of development projects.

Potential changes to flood patterns at the Airport would be assessed at the project-specific level as certain development projects are implemented, as discussed above. Compliance with the City's Flood Plain Management zoning chapter would ensure that no cumulative impacts related to flooding would occur.

4.5.6 Comparative Impacts of Alternatives

No Project Alternative

The No Project alternative would have less impacts related to drainage and water quality as the project as proposed since less impervious surface would be present at the Airport. However, the Airport's existing SWPPP, which maintains compliance with the City's SWMP and its NPDES General permit, would still be enforced during all maintenance projects.

The No Project alternative could have greater risk related to flooding than the project as proposed. Under this alternative, several structures and land uses that are currently located within the floodways on the Airport would remain in place. This includes the maintenance yard located adjacent to Carneros Creek and two existing hangar buildings (Buildings Nos. 248 and 249). In addition, mitigation recommended to protect the Airport from future sea level rise would not necessarily be realized under the No Project alternative.

Environmentally Superior Alternative

The Environmentally Superior alternative would have less impact related to drainage and water quality since the Taxiway H project would not occur, resulting in less impervious surfaces at the Airport. The Airport's existing SWPPP, which maintains compliance with the City's SWMP and its NPDES General permit, would still be enforced during all development projects occurring under this alternative. These projects would be designed to capture and treat the calculated amount of runoff from the project site for a one-inch, 25-year storm event, over a 24-hour period.

The Environmentally Superior alternative would have less risk related to flooding when compared to the project as proposed. Under this alternative, the recommended taxiway project, which would have been located partially within the floodway along Carneros Creek, would not be constructed.

Other existing uses located within floodway areas, i.e., the maintenance yard and two historic hangars, would be relocated out of the floodway in the same manner as they would under the proposed project. Future fuel farm expansion could occur, but would be subject to the City's Floodplain Management zoning chapter. Similarly, development occurring under the Environmentally Superior alternative that would be located within Zone AE, but outside mapped floodways, and would also be subject to the City's Floodplain Management zoning chapter.

Future recommended mitigation to protect the Airport from sea level rise would still be implemented with this alternative.

4.5.7 Mitigation Measures

The City's Flood Plain Management chapter of its *Municipal Code* (Chapter 22.24) would apply to any proposed construction within Special Flood Hazard Areas, which include the mapped floodways and the 100-year floodplain (Zone AE) at the Airport. This would affect all recommended development projects, including approximately 600 feet of the westernmost portion of the extension of Taxiway H and its most westerly connector taxiway with Runway 7-25 to be located within a mapped floodway. It would also potentially affect a segment of perimeter fence recommended for replacement that is located due east of the Runway 25 end and the future expansion of the existing fuel farm. Other than compliance with the City's *Municipal Code* and any conditions of a City-issued variance or development permit, as well as implementation of the City's SWMP and the Airport's NPDES permit and SWPPP, no mitigation for drainage, water quality and flooding is necessary.

Recommended Mitigation Measures for Hydrology and Water Quality Result HYD-2c

Future flooding at the Airport due to climate change and sea level rise is anticipated to be approximately five feet over the next 85 years.

HYD/mm-1: **The potential impact of local sea level rise associated with global climate change should be considered in the planning and design of recommended Master Plan projects. Project-specific CDP submittals for projects that may be subject to tidal inundation and flooding should include an analysis of improvement location and design in relation to projected future changes in sea level rise, utilizing the best available science, to ensure new development is located and designed to eliminate or minimize, to the maximum extent feasible, hazards associated with anticipated sea level rise over the expected design life of the project (75 years).**

HYD/mm-2: **The Airport should raise all new or reconstructed buildings to one foot above base flood elevations as well as apply thicker pavement lifts during regular intervals over the lifetime of the Airport to reduce the potential for flooding on the tarmac.**

4.6 LAND USE AND PLANNING

4.6.1 Environmental and Regulatory Setting

The Airport is owned and operated by the City of Santa Barbara; however, the Airport is surrounded by land within the City of Goleta, the County, and UCSB. Refer to Exhibit 1A, which depicts various jurisdictions within the vicinity of the Airport.

The land surrounding the Airport contains: Pacific Ocean coastline and beaches (south); UCSB and the associated student community of Isla Vista (southwest); industrial and commercial land uses (north and east); golf courses and undeveloped open space (north and west); and residential land uses (interspersed within the nearby commercial, recreational, and educational land uses). Specific land uses in proximity to the Airport include the Ocean Meadows Golf Course 0.7 mile to the west, the Twin Lakes Golf Course directly across Hollister Avenue to the north, the Goleta Sewer District Treatment Facility adjacent on the southeast, and the Goleta Beach and Pier further to the southeast.

City General Plan land use designations for the Airport are "Airport" and "Goleta Slough Natural Reserve." These designations generally mirror the Airport's zoning districts, i.e., the "Goleta Slough Natural Reserve" land use designation covers areas of the Airport zoned as G-S-R while the remainder of the Airport is designated as "Airport." The following zones are present at the Airport (**Exhibit 4H**):

- A-C, Airport Commercial
- A-F, Airport Facilities
- A-I-1&2, Airport Industrial
- A-A-O, Airport Approach & Operations
- C-R, Commercial Recreation
- G-S-R, Goleta Slough Reserve
- P-R, Park & Recreational

The Airport is also in two overlay zones:

- SP-6, Airport Industrial Area Specific Plan, which applies to the Airport's industrial park located along Hollister Avenue.
- S-D-3, Special District 3 Coastal Overlay, which applies to all of the Airport property within the Coastal Zone (i.e., south of Hollister Ave.)

Since land use compatibility can be related to noise and other nuisance impacts, a "windshield" survey was conducted to determine if sensitive receptors such as residences, schools, places of worship, and long-term health care facilities, are located within proximity to the Airport. There are no sensitive receptors within the Airport's existing (2011) Community Noise Equivalent Level (CNEL) noise contour,[14] which extends off the Airport property east over a mixed industrial/warehouse area off Bush Lane and Thornwood Drive and west between South Los Carneros Road and Storke Road between the Airport boundary and Home Depot (**Exhibit 4J**).

The closest residences to the Airport are small single-family homes interspersed within the mixed industrial/warehouse area east along South Fairview Avenue and a multifamily residential complex (Willow Springs Apartments) along Willow Springs Lane. There are no residences located within the 65 CNEL for the Airport; there are, however, several single-family residential neighborhoods and one trailer park located within, or partially within, the 60 CNEL. Although located adjacent to Airport property to the south, UCSB is located outside the 60 CNEL and is buffered from Airport operations by Goleta Slough.

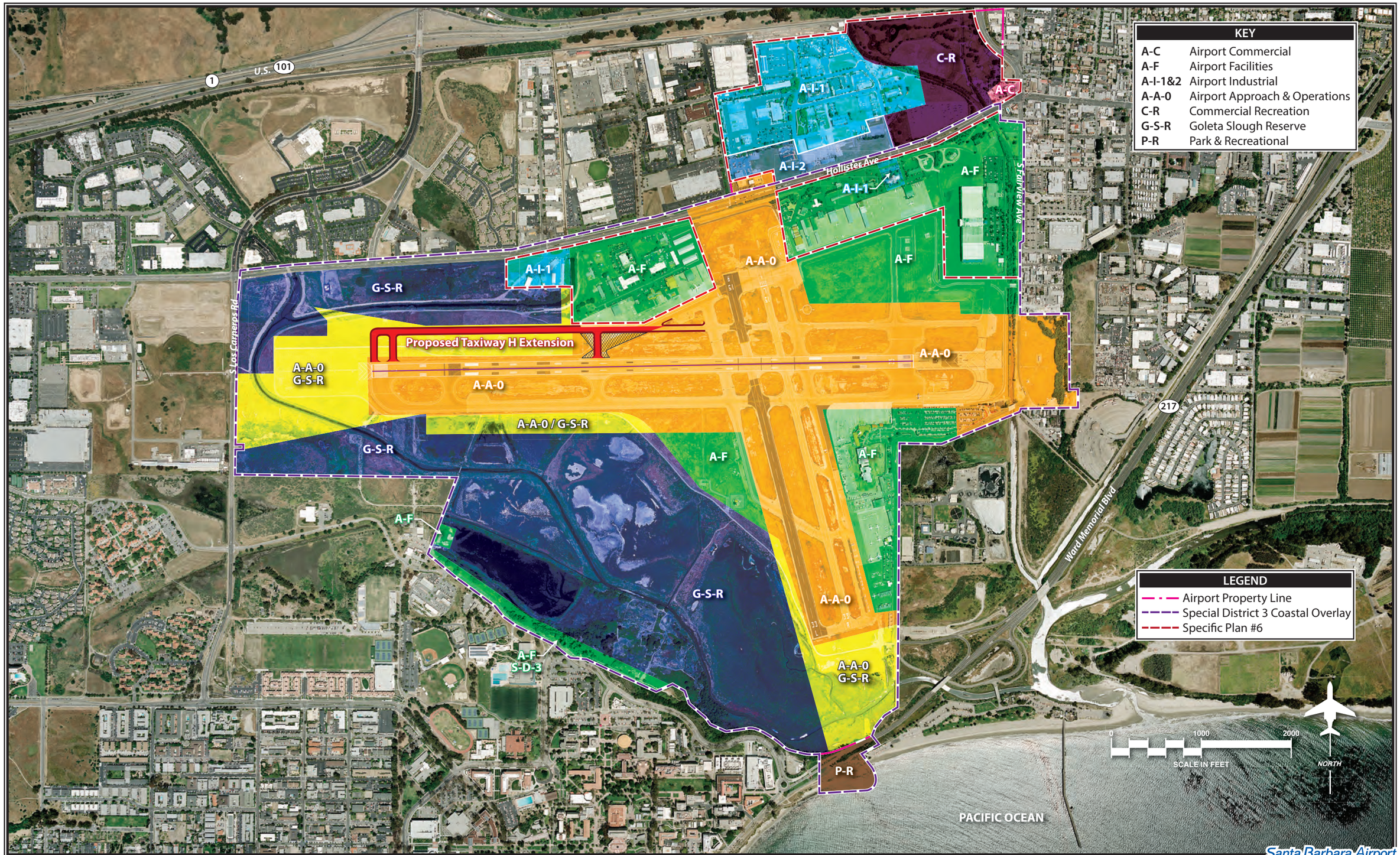
Regulatory Setting

Federal

The Federal government has delegated the administration of Federal airspace and airports to the FAA. Title 49 of the USC and Title 14 of the CFR contain many of the safety regulations, funding procedures, and other rules applicable to the development and operation of airports. FAA Order 5100.38D, *Airport Improvement Program Handbook,* in particular, contain the procedures that airports must follow pursuant to Federal regulations (FAA 2014).

In addition, the FAA is the lead Federal agency responsible for ensuring compliance of airport-related projects with the *National Environmental Policy Act of 1969* (42 USC 4321 et seq.). As

[14] Ambient noise levels are determined as averaged 24-hour weighted levels, using the Day-Night Noise Level (L_{dn}) or Community Noise Equivalence Level (CNEL) measurement scales. The L_{dn} averages the varying sound levels occurring over the 24-hour day and gives a ~~10~~ 10-decibel penalty to noises occurring between the hours of 10:00 p.m. and 7:00 a.m. to take into account the greater annoyance of intrusive noise levels during nighttime hours. Since L_{dn} is a 24-hour average noise level, an area could have sporadic loud noise levels above 60 dB(A) which average out over the 24-hour period. CNEL is similar to L_{dn} but includes a separate 5 dB(A) penalty for noise occurring between the hours of 7:00 p.m. and 10:00 p.m. CNEL and L_{dn} values usually agree with one another within 1 dB(A). In general, a change in noise level of less than three decibels is not audible. A doubling of the distance from a noise source will generally equate to a change in decibel level of six decibels.



Source: Santa Barbara Airport Aviation Facilities Plan, 2003 (zoning updated as of 6/2016)

Santa Barbara Airport

Exhibit 4H
AIRPORT ZONING



Santa Barbara Airport

Exhibit 4J
EXISTING (2011) NOISE CONTOURS

discussed in FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, a project's compatibility with surrounding land uses is usually associated with the extent of the project's noise impacts. Per FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures*, Appendix A, Paragraph 4.3, when the noise analysis determines that a significant impact would occur over noise-sensitive areas within the 65 dB DNL (also known as L_{dn}) noise contour, the compatible land use section should include a discussion on mitigation measures to be taken along with other land use controls (FAA 2006). Airport projects, such as those needed to accommodate fleet mix changes, an increase in operations at the airport, or air traffic changes are examples of activities which can alter noise impacts and affect surrounding land uses.

In addition, if the proposed project would result in other impacts exceeding thresholds of significance which have land use ramifications, such as disruption of communities, relocation of businesses or residences, and induced socioeconomic impacts, the effects of these land use impacts are also discussed.

State

The California Department of Transportation, Division of Aeronautics (Caltrans Aeronautics), also has authority over airports pursuant to the *State Aeronautics Act* (SAA) (California Public Utilities Code [PUC], Sections 21001 et seq.). Caltrans Aeronautics issues permits for, and annually inspects, public-use airports. It also provides grants and loans to airports for safety, maintenance, and capital improvement projects. Caltrans has prepared the *California Airport Land Use Planning Handbook* (Handbook), which implements the SAA pursuant to California PUC sections 21674.5 and 21674.7 (Caltrans 2011).

Local/Regional

As previously discussed in Section 4.2.1, the City is responsible for processing CDPs in concert with the policies of the certified LCP for development within the Coastal Zone. The City is also responsible for issuing grading permits, building permits, and floodplain development permits for development at the Airport. The City's Historic Landmarks Commission and Architectural Board of Review processes may also apply. Authority to Construct permits from the County APCD would be required for certain projects, as discussed in Section 4.1.1. Review of the proposed Master Plan by the airport land use commission (ALUC) would also occur and is discussed in Sections 2.5 and 4.6.5.

4.6.2 Applicable Plans and Policies

There are two primary planning documents that address development at the Airport, both of which are under the jurisdiction of the City of Santa Barbara: the SP-6 Plan (1998) and the Airport's *Aviation Facilities Plan* (2003). Together, these two documents comprise the Airport's existing Master Plan.

The only parts of the current Master Plan study area that are within the SP-6 planning area are two areas south of Hollister Avenue and east of the GSER (SP-6 Plan, Subarea 1), one either side of the Runway 15R-33L airfield area (City of Santa Barbara 1998) (**Exhibit 4K)**. Applicable SP-6 Plan policies include:

Policy V1: Preserve the economic self-sufficiency of the Airport by allowing flexibility in land use patterns, tenant types and mix.

Policy V2: Provide opportunities that promote aviation related uses south of Hollister Avenue. Encourage the relocation of non-aviation uses to the north side of Hollister Avenue.

Policy TR1: Provide opportunities that promote aviation related uses south of Hollister Avenue.

Policy TR2: Preserve and encourage the expansion of existing businesses on Airport property.

Action TR2.1: Consider tenant relocation on a phased basis.

Policy SA1 (Sub-Area 1): Create opportunities for expansion of existing and new aviation related uses within this planning area which falls adjacent to the airfield east of Carneros Creek. Provide for expanded aviation services, e.g., Fixed Base Operators, air cargo, USFS facilities, T-hangars, etc. ...

The SP-6 Plan Land Use Map (**Exhibit 4K**) shows primarily existing and proposed Aviation-Related land uses, as well as existing Public/Institutional uses (the on-airport fire station, airport traffic control tower, and City maintenance yard), Open Space (the regulatory floodway), and one Commercial property (an existing restaurant).

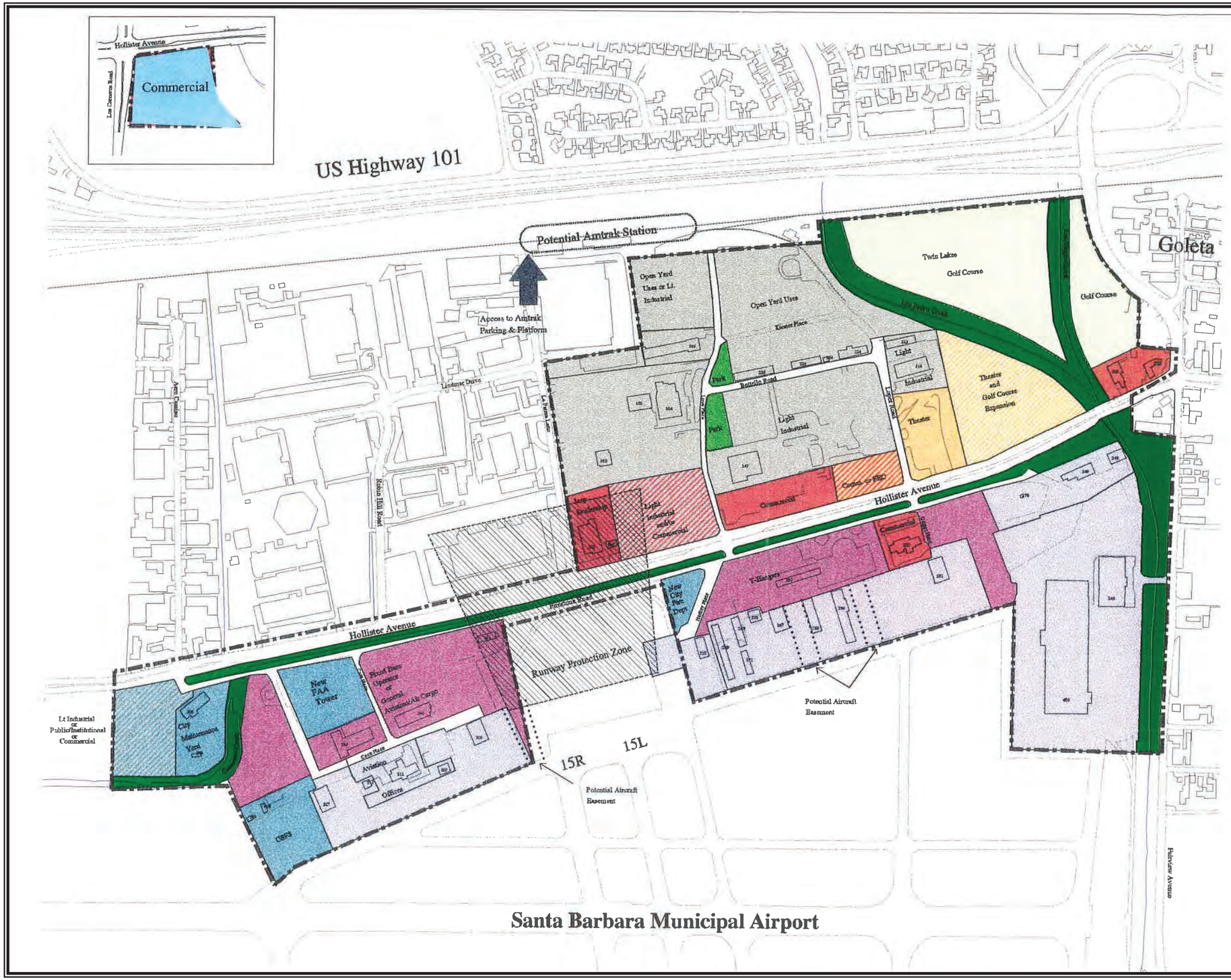
The Airport also has its own LCP, prepared by the City of Santa Barbara and certified by the CCC. The City's *Coastal Plan: Airport and Goleta Slough* (2003) discusses the resources found within the Airport component of the City's Coastal Zone and the existing plans and policies of the City, and presents LCP policies designed to provide additional protection to coastal resources not adequately protected under the City General Plan policies. The LCP is also intended to regulate Coastal Zone development in conformance with the Coastal Act. See **Table 4E** (Section 4.2.2) for a list of LCP policies specific to protection of biological resources at the Airport. Other LCP policies applicable to the proposed Master Plan are listed in **Table 4J**.

TABLE 4J
LCP (Non-Biological) Policy Summary
Santa Barbara Airport

	Policy
Policy C-13	A Water Quality Mitigation Plan (WQMP) shall be developed and implemented for new development or redevelopment projects that entail greater than or equal to one acre of disturbance. WQMPs shall be developed and implemented consistent with the most recent requirements of the Regional Water Quality Control Board (RWQCB) or Coastal Commission standards for controlling polluted runoff, whichever is more stringent. A WQMP shall incorporate the following criteria:

Santa Barbara Airport Commercial/Industrial Specific Plan

Figure 10
Land Use Map



North of Hollister Avenue

- Light Industrial
- Commercial
- Entertainment Use (FEC)
- Golf Course
- Park
- Open Space

South of Hollister Avenue

- Existing Aviation Related Uses
- Proposed Aviation Related Uses
- Public/Institutional
- Open Space

Note:

Only theater parking expansion will occur in floodway.

N

0 200 400 600 800 Feet

Source: City of Santa Barbara 1998, *Santa Barbara Airport Industrial Area Specific Plan (SP-6)*

Santa Barbara Airport

Exhibit 4K

AIRPORT INDUSTRIAL AREA SPECIFIC PLAN LAND USE MAP

	• Where feasible, drainage plans shall be designed to complement and utilize existing drainage patterns and systems, conveying drainage from developed areas of the site in a non-erosive manner. Disturbed or degraded natural drainage systems shall be restored where feasible, except where there are geologic or public safety concerns. • Post-development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate to the maximum extent feasible. All dry weather runoff shall be captured and filtered, infiltrated or treated to remove airport pollutants, including oil, grease and particulates, to the maximum extent feasible, prior to discharge. • Post-development phase drainage and polluted runoff control plans shall be developed which shall specify site design, source control and treatment control BMPs that will be implemented to minimize post-construction polluted runoff, and shall include monitoring and maintenance plans for BMPs. • Post-construction structural BMPs (or suites of BMPs) shall be designed to treat, infiltrate or filter the amount of stormwater runoff produced by all storms up to and including the 85th percentile, 24-hour storm event for volume-based BMPs and/or the 85th percentile, 1-hour storm event (with an appropriate safety factor, i.e., 2 or greater) for flow-based BMPs. • Necessary drainage devices, culverts, and outfalls shall not cause or contribute to streambank erosion or creek or wetland siltation and shall include BMPs to minimize impacts to water quality including construction phase erosion control and polluted runoff control plans, and soil stabilization practices. • The City shall maintain any drainage device to ensure it functions as designed and intended. All structural BMPS shall be inspected, cleaned, and repaired when necessary prior to September 30th of each year. Repairs modifications, or installation of additional BMPs, as needed, shall be carried out prior to the rainy season. • Alterations and disturbance of streams or natural drainage courses or human-made or altered drainage courses, where permitted pursuant to Coastal Act Section 30236 and LCP Policy 6.11, shall include BMPs for hydromodification activities. Monitoring shall be implemented, where required by the RWQCB, to ensure that average annual pollutant loadings do not exceed pre-development rates and/or water quality standards. The WQMP shall specify sampling locations, sampling protocols, pre-development pollutant levels and permitted standards for pollutants consistent with RWQCB standards. Monitoring shall be conducted annually consistent with RWQCB standards. If it is determined that pre-development levels and/or water quality standards are exceeded, annual monitoring shall be conducted for a period of at least five years, or until it is determined that pre-development levels and water quality standards are not exceeded. An assessment of the potential sources of the excessive pollutant loadings shall be conducted, including inadequate or failed BMPs, and corrective actions to remedy the water quality impacts shall be implemented.
Policy C-14	Construction Phase Erosion Control and Polluted Runoff Control Plans shall be developed for new development or redevelopment projects that require a Coastal Development Permit and a grading or building permit. These plans shall be implemented during the construction phase/phases of the project and shall include: • Best Management Practices (BMPs) designed to minimize erosion and sedimentation, provide adequate sanitary and waste disposal facilities and prevent contamination of runoff by construction chemical and materials. • Re-vegetation of disturbed areas shall occur at the completion of grading activities. Re-vegetation plans shall consist of native, non-invasive plants species and shall minimize the need for fertilizer, pesticides, herbicides, and excessive irrigation. Where irrigation is necessary to establish new plantings, efficient irrigation practices shall be required. • Outdoor material storage areas shall be designed using BMPs to prevent storm water contamination from stored materials. • Trash and debris storage areas shall be designed using BMPs to prevent stormwater contamination by loose trash and debris.

	• Grading and other ground disturbance activities shall be conducted outside of the rainy season. Grading during the rainy season shall be permitted only when there is no other feasible alternative for scheduling, and/or for completing ongoing construction activities prior to the rainy season, only where the City determines that completion of grading is more protective of resources, and only when adequate interim erosion control methods are implemented to ensure that activities will not result in excess erosion and sedimentation. • A Construction Contingency Plan shall be developed to address methods to control potential migration of contamination discovered during construction activities and shall include methods to identify and control potential migration of subsurface contaminants to the surrounding environment.
Policy A-1	Access within the Slough will be restricted to those persons and organizations conducting compatible research and educational projects. <u>Actions</u>: • Continue a permit system for Slough access and institute an ongoing screening procedure; keep records of how frequently; how many people enter the Slough, and keep track of research projects underway in the Slough. • Review the existing rules and regulations regarding use of the Slough and modify the restrictions if there is a need. Persons using the Slough must demonstrate that they are aware of the rules and regulations governing use of the Slough. • Determine if and when educational tour routes in dry land areas of the Slough are feasible and develop procedures for such tours. Post signs explaining why access has been limited and soliciting cooperation.
Policy B-1	Provide area(s) and facilities on the periphery of the wetland for the recreational and education use of Slough as funding permits. <u>Actions</u>: • A site-specific plan will determine the appropriate location, nature, and extent of viewing decks, platforms, and/or similar facilities for observing the Slough from the upland periphery. • The cooperation of the University will be sought in this matter, particularly with regard to the possibility of sharing parking facilities and locating viewing platforms on University property. • Realizing the financial limitations of the City, outside funding sources for the development and maintenance of such facilities will be sought. • Education/explanatory signs will be developed and installed as a part of any walking tour and viewing facilities project.
Policy E-1	Airport facility development shall reflect a high standard of development consistent with the character and quality of Santa Barbara. <u>Actions</u>: • The City shall adopt and implement a landscaping beautification plan for the Airport. • The City shall investigate using local college and university work study programs as a source of help for a planting or landscaping program. • The City shall investigate funding of street signing and tree planting programs. • The City shall establish an architectural theme for future airport development. • The regular repair and maintenance program directed at roofing and painting existing airport buildings shall be continued.
Policy F-1	The area of and around the archaeological site identified as SBa-52 is to be dedicated as a limited use area with access restricted. Use of this area by Chumash descendants for religious and ceremonial purposes which do not damage or destroy the archaeological resources of the site is preferred.

	Actions: • Repair and keep in good repair the fence and gate which encloses the site. • Report and prosecute those who trespass. Arrange a meeting with the various interested Indian groups (i.e. the Brotherhood of the Tomol, the Quabajai, the Indian Center of Santa Barbara), and interested archaeologists to determine the nature and extent of activities that would be allowed on the site if their exclusive use is allowed. If such use does not violate the letter and spirit of the goals and policies for the Goleta Slough - Sensitive Habitat portion of the Local Coastal Program, appropriate legal arrangements are to be made with the Chumash to formalize this arrangement.
Policy F-2	The City of Santa Barbara will seek to have the site known as SBa-52 placed on the National Register of Historic Places. Actions: • File application for registration as a Historic Place.
Policy F-3	New development shall protect and preserve archaeological or other culturally sensitive resources from destruction, and shall minimize and, where feasible. Avoid impacts to such resources. "Archaeological or other culturally sensitive resources" include human remains, and archaeological, paleontological or historic resources. • Coastal Development Permits for new development within or adjacent to archaeologically or other culturally sensitive resources shall be conditioned upon the implementation of appropriate mitigation measures to minimize and, where feasible, avoid impacts to such resources. • New development on or adjacent to sites with archaeologically or other culturally sensitive resources shall include on-site monitoring by a qualified archaeologist/sand appropriate Native American consultant/s of all grading, excavation and site preparation that involve earth-moving operations.
Policy G-1	Prior to approval of any development at the Airport by the Airport Commission, Architectural Board of Review, or other discretionary bodies of the City, a finding shall be made that adequate public service, including water, wastewater, traffic circulation, and parking are available to meet the needs generated by the proposed development. Actions: • Using the Master Environmental Assessment, the City shall monitor and update on an on-going basis, information on water supply and demand, wastewater demand, traffic circulation and the adequacy of parking facilities to ascertain the short-term and cumulative long-term impacts of development in the Airport area. • As part of the Environmental Impact Statement required for adoption of the "Airport Land Use Plan", the City shall address the potential impacts upon public services including trat11c circulation which potentially would be created by implementation of the Plan. Prior to the approval of any development plans for the area, mitigation measures as developed in the EIS shall be implemented consistent with all relevant Coastal Act policies. • Any substandard portions of the water and wastewater systems at the Airport shall be improved when new developments would result in an increase in the use of the system. • The City shall support and continue to encourage the use of public transit for Airport employees and passengers. • Airport passenger parking spaces shall be increased at a rate equal to the rate of passenger demand and consistent with the "Airport Master Plan" when adopted. • The City shall continue to work towards the finalization of the Water Services Agreement with the Goleta Water District. • The City shall continue to pursue funding through the Clean Water Grant Program to upgrade any malfunctioning portions of the existing waste water system at the Airport.

Section 30253	New development shall do all of the following: (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard. (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. (c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development. (d) Minimize energy consumption and vehicle miles traveled. (e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.
LCP/GP Seismic/Safety and Conservation Elements	Fault Displacement 1. Buildings shall not be allowed to be constructed over an identified active fault. Appropriate setback requirements shall be determined by a registered engineering geologist based upon the specific site conditions involved. 2. The Mesa and Lavigia Faults shall be considered as potentially active, unless detailed seismic-geologic investigations confirm the contrary. Any other faults shall be considered as potentially hazardous and subject to further geologic investigation prior to development. Ground Shaking 1. Specific seismic investigations shall be conducted by appropriate consultants (engineering geologist, geophysicists, structural engineer, etc.) for all public buildings, disaster response facilities, schools, etc., and any structure over three stories located in the filled estero or thicker alluvium areas as shown on the Seismic Hazards Map. Liquefaction 1. Liquefaction evaluations and recommendations should be made by a qualified soils engineer for all new major or public structures located in high or conditional liquefaction potential areas (shown on the Liquefaction Hazard Map) whose failure could result in loss of life or high monetary loss. 2. Geologic reports which are prepared for areas of potential liquefaction and submitted for City review shall be sent for review by an independent registered engineering geologist to determine its adequacy and completeness. Landslides 1. Any proposed development within areas of active and inactive landslides as shown on the Soil Creep and Expansive Soil Map of the Seismic Safety/Safety Element of the General Plan shall be evaluated by a qualified soils engineer to determine the feasibility of safe development occurring without the risk of renewed movement. The soils report shall include recommendations for slope stability measures to be taken, if needed, for safe development to occur. This report will be subject to the approval of the Building Official. 2. Any grading operations undertaken in areas of active and inactive landslides shall be designed and supervised by a qualified soils engineer. Erosion 1. Detailed grading plans with strict revegetation provisions shall be required for all sites of proposed structures in areas of active erosion or high erosion potential. If cuts greater than 4 feet in height are proposed, the grading plan should consider erosion control in areas with a conditional erosion potential. 2. Major construction projects in areas of active erosion or high erosion potential shall be required to implement erosion and sediment control procedures during the construction phase of the project.

	High Groundwater 1. In areas where near surface groundwater is present or where historic high groundwater levels could return to their previous high levels, soils engineering and foundation studies shall be conducted to determine what engineering measures would best mitigate any potentially adverse impacts. Tsunami 1. Tsunami warning and evacuation procedures as outlined in the City of Santa Barbara Natural Disaster Plan should be periodically reviewed and amended to ensure that it will facilitate the rapid and orderly evacuation of the hazard area in the case of an imminent tsunami. Seiche 1. To reduce the potential impact of seismically induced seiches, the seiche hazard shall be considered in all development within areas near open bodies of water and the harbor. Flooding 1. Floodplain management programs shall be implemented through the Building Officer of the Division of Land Use Controls, and the Flood Control Division. - Prohibit the construction of new structures in stream channels (except stream measurement or flood control related facilities). - Encourage light-intensity use in the floodway or floodway fringe with the requirement that such uses shall not impair the flood-carrying capacity of the stream. - Require adequate setbacks from flood channels of any new development as defined under the Federal Flood Insurance Program, for those properties within the identified flood hazard area. - Encourage the use of permeable or pervious surfaces in all new development to minimize additional surface runoff. 2. Hazard reduction programs shall be implemented in urban sections of the City already built in hazardous, flood-prone areas. - Restrict the replacement of old structures within the floodway fringe unless the applicant has satisfactorily demonstrated that the structure will not impair flood flow, and has proved that the floodway fringe boundaries as designated by the HUD maps should be adjusted. - Regulate buffer zones along creeks to protect against bank erosion from public or private practices including grading, brush clearing, trail maintenance, dumping, or construction of private structures such as bridges or walkways across creeks. Routine debris removal by the City for flood reduction is exempted.

SOURCE: City of Santa Barbara, 2003. *Coastal Plan: Airport and Goleta Slough*, as amended by the California Coastal Commission, May.

City General Plan policies are also applicable to the Airport and include those found in both the various elements of the *City of Santa Barbara General Plan* the *Santa Barbara General Plan* amendments (2011). As part of this chapter (Chapter Four), and within each resource discussion, an analysis has been undertaken to determine any potential conflicts with applicable land use plans, policies, or regulations of agencies with jurisdiction over the project.

In addition to those plans and policies relating to environmental effects, *Santa Barbara General Plan* includes measures applicable to the Airport and its industrial areas, such as policies related to the Airport's role in promoting jobs and economic health in the City. When analyzing the environmental effects of *Santa Barbara General Plan,* the certified Final EIR assumed "continued moderate growth of the City's Airport and adjacent specific plan area" (City of Santa Barbara 2010). These additional *Santa Barbara General Plan* policies are listed below.

EF15. Protect Industrial Zoned Areas. Preserve the industrial zones as a resource for the service trades, product development companies, and other industrial businesses not precluding priority housing in the C-M, Commercial Manufacturing Zone.

EF16. Industrial Uses. Ensure that there is sufficient land available for industrial uses.

Because *Santa Barbara General Plan* addressed only some of the elements within the City's General Plan, the old General Plan elements are still applicable as well. In Volume 1 of the City's 1995 General Plan, which includes the Land Use Element, it states the following with regard to the Airport:

"It is proposed that the following approaches be taken to the utilization and function of these lands.

1. The Airport facilities and Airport operation land uses should continue and be expanded as necessary to serve the function of a local airport with its passenger and freight service area generally confined to tying the South Coast area to the greater metropolitan areas of Los Angeles and San Francisco.

2. The land which will not be used for Airport functions is, essentially, no different than the surrounding lands in the Goleta area. The fact that the property owner happens to be the City of Santa Barbara does not affect its land use relationship to the balance of the area. Because of the magnitude of problems, such as noise, air, and visual pollution, the City, County, and UCSB should cooperate in determining a desirable and appropriate land use for this area of Goleta in relationship to economic, social, and environmental impact upon both individuals and community structure. …

… Planning for airport development should be guided by the following basic principles:

1. Noise, air pollution, and all other adverse environmental and ecological impacts must be reduced and held at absolute minimum levels.

2. Land use, both aeronautical and non-aeronautical related, must be planned to produce a low intensity of activity, commensurate with the local nature of the airport and respecting the low residential, commercial, and industrial density of the Goleta area.

3. All planning for this important transportation element and its related facilities should be coordinated with the County."

In addition, the Circulation Element contains the following policy and implementing strategy for other transportation facilities:

15.2 Manage and operate the Airport in an efficient, cost-effective, and safe manner.

Other policies of the General Plan include the preservation and restoration of the Goleta Slough (Conservation Element), the implementation of land use compatibility standards for noise (Noise Element), and the following policies related to urban design.

> ER11. Native and Other Trees and Landscaping. Protect and maintain native and other urban trees, and landscaped spaces, and promote the use of native or Mediterranean drought-tolerant species in landscaping to save energy and water, incorporate habitat, and provide shade.
>
> PS6. Water Conservation Program. The use of water conservation practices shall be both encouraged and required, as appropriate, for all development projects.

In addition, SBCAG, as the County's ALUC, has prepared the *Santa Barbara County Airport Land Use Plan* (ALUP) (1993). This document is being updated in the form of an Airport Land Use Compatibility Plan (ALCUP), per the Caltrans Handbook. The proposed Master Plan, if approved, would be incorporated into the next ALUCP update, as necessary. See Section 2.5 of this Final Program EIR for additional discussion.

4.6.3 Impact Evaluation Methodology and Significance Criteria

Based on the CEQA Guidelines checklist, the following significance criteria have been applied to this proposed project:

- Would the project physically divide an established community?
- Would the project conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

In addition, land uses incompatibility can result from a proposed project's generation of noise, odor, safety hazards, traffic, visual effects, or other environmental impacts. These potential impacts have been addressed within the proposed project's Initial Study and are addressed in this Program EIR as appropriate.

4.6.4 Project-Specific Impacts

Impacts to Established Communities

Impact LU-1: The proposed project does not involve any improvements that have the potential to physically divide the surrounding communities nor would it close any existing bridges or roadways. (See Section 4.8 for a discussion of transportation/traffic related to the proposed Master Plan's implementation.) All improvements occurring under the proposed Master Plan would occur on Airport property.

The proposed Master Plan recommends several types of construction or demolition activity at the Airport over the next 20 years. These would include the demolition of existing buildings, the construction of new buildings, the relocation of the maintenance yard and glideslope antenna, replacement of Airport ancillary structures such as perimeter fencing, and the grading, paving and/or pavement rehabilitation of taxiways and runways. The closest sensitive noise-receptors (i.e., residents of Willow Springs Apartments) are located approximately 425 feet from the maintenance yard to be relocated. This is the closest recommended project to the neighborhood. The next closest project would be the Taxiway H Airfield Safety Project, which would be located approximately 900 feet away at its nearest point.

Result LU-1: **No significant impacts would occur to adjacent communities as a result of the proposed project. Since all construction or demolition activity at the Airport would be reviewed at a project-specific level by the City and is required to comply with the City's noise ordinance, construction noise at the distances discussed above would have Class III, Less than Significant Impact on noise-sensitive receptors.**

Compatibility with Applicable General Plan Policies and Other City Plans

Impact LU-2: Moderate enplanement growth at the Airport (2.8 percent compound annual growth rate) is projected to occur by FAA in its 2012 Terminal Area Forecast (TAF) and was used in the growth forecasts for the proposed Master Plan. This moderate growth rate is the basis for not only recommended projects in the proposed Master Plan, but was accounted for in the City's General Plan, Climate Plan, and SWMP. (As previously stated in Section 1.2, the City's General Plan considers "moderate growth" at the Airport that was based on the 2003 *Aviation Facilities Plan's* aviation demand forecast which included scenarios for one to four percent annual growth rate of annual enplaned passengers and two percent per year growth in general aviation (GA) aircraft operations.) The proposed project is also consistent with the City land use policies listed in Section 4.6.2.

An analysis of consistency with the City's General Plan policies and other plans adopted for the purpose of avoiding or mitigating an environmental effect has been included within the various environmental resource categories of this Program EIR. Based on this analysis, the project is Consistent with all applicable sections of the City's General Plan, Climate Plan, and SWMP. Analysis of City LCP policies as they relate to the Goleta Slough are discussed in the next section.

Result LU-2: **The proposed Master Plan would not preclude the implementation of applicable City General Plan, Climate Plan, or SWMP policies into individual development projects or airfield safety improvements, where appropriate, as long as the safety of the Airport is maintained. Required mitigation measures related to the City's Standard Conditions of Approval would also ensure that the project is consistent with the City's applicable plans and policies. Impacts to applicable land use and other City plans as a result of the proposed Master Plan would be Class III, Less than Significant Impact.**

Compatibility with the Santa Barbara Airport Industrial Area Specific Plan and SP-6 Zoning

Impact LU-3: The City of Santa Barbara Planning staff has analyzed the proposed Master Plan's consistency with the City's SP-6 Plan and has determined that it is consistent with the intent of policies within the SP-6 Plan, including policies specific to Subarea 1. The SP-6 Plan Land Use Map for Subarea 1 shows a pattern of development that is similar to what is recommended by the proposed Master Plan. In addition, the proposed Master Plan is consistent with the zoning districts currently over the subarea (A-I-1, Airport Industrial, and A-F, Airport Facilities).

Although the SP-6 Plan included an Illustrative Plan with a development concept that is different from the proposed Master Plan, the Illustrative Plan exhibit also states that it is intended to show "one potential development concept and the actual buildout will likely vary from this initial projection." The SP-6 Plan envisioned that approximately 70,000 square feet of new aviation-related facilities could occur at full buildout, excluding T-hangars. It also assumed the gradual removal of 18 older buildings within Subarea 1 with a net decrease in approximately 3,000 square feet overall.

The proposed Master Plan recommends the demolition of six buildings (approximately 41,000 square feet). Building Nos. 268, 269 and 271 are a storage building and two older hangars that would be replaced with two rows of 13-unit T-hangars; Building Nos. 303, 304, and 344 are two office/storage buildings and an office/research and development (R&D) building that would be replaced with two rows of 15-unit T-hangars. Other office or R&D buildings and older aircraft hangars may or may not be removed depending on the plans of future lease holders at the Airport. All future development within the part of the proposed Master Plan that is also within Subarea 1 of the SP-6 Plan will be evaluated by City of Santa Barbara Planning staff for consistency with relevant SP-6 Plan policies at a project-specific level.

Much of the recommended north landside development in the Master Plan would occur in the Airport Industrial Area specific planning area and would be subject to the provisions of the SP-6 overlay zone (see Chapter 29.30 of the

Santa Barbara's *Airport Zoning Ordinance*). No issues with the SP-6 overlay as a result of recommended development are anticipated. The maintenance yard is located within the A-I-1 zone. The closure of the maintenance yard is assumed to be consistent with this zone.

Result LU-3: **Since the proposed Master Plan is consistent with the SP-6 Plan's Land Use Map for Subarea 1, applicable policies and zoning, and Subarea 1's redevelopment focus, impacts related to SP-6 Plan consistency would be Class III, Less than Significant Impact.**

Compatibility with the Airport's Local Coastal Program

Impact LU-4: An analysis of consistency with the City's LCP policies adopted for the purpose of avoiding or mitigating impacts to coastal resources has been included within the various environmental resource categories of this Program EIR and a summary policy consistency analysis with the City's LCP policies is provided below. Based on this analysis, with mitigation, the proposed Master Plan is consistent with all applicable LCP policies addressing potential impacts to water/marine resources, wetlands, environmentally sensitive habitats, public access and recreation, visual resources, cultural resources, public services, and hazards related to geology, fire, flooding and sea level rise (including potential tsunami hazards).

Water Quality and Marine Environments

New development on the airport property in proximity to Goleta Slough and the various waterways/drainages that traverse the property has the potential to impact coastal water quality through grading, removal of native vegetation, increase of impervious surfaces and associated runoff, erosion, and sedimentation. In addition, due to the history of aviation use of the airport property and the types of material associated with aircraft operation and maintenance, there is a potential for encountering contaminated sites and/or release of hazardous materials during construction and operation.

New development associated with the Master Plan would not be located within the waterways/drainages that traverse the airport property and therefore would not result in channelization or substantial alteration of onsite waterways. The majority of proposed Master Plan improvements would be located in developed areas of the Airport, and airfield safety improvements (taxiway extension/improvements) would be located in level areas, thereby limiting grading, substantial increases of new impervious surfaces, and disturbance to natural drainage features. New or improved drainage systems necessary to convey runoff from improvement areas, including any drainage

discharge or disposal devices, would be designed to avoid or minimize impacts to the site's waterways/drainages.

Compliance with the LCP's water quality policies, Policies C-12, C-13 and C-14, and identified mitigation measures which include implementation of construction and post-construction BMPs, would ensure that new development for the Master Plan would be implemented in a manner to protect water quality. The Airport has an active SWPPP and a City-approved storm water management plan, both of which include measures to manage potential hazardous materials and to protect water quality at the Airport. In addition, all development would have to comply with the Airport's NPDES Industrial Permit and spill prevention control and countermeasures (SPCC) plans and operations manuals. Therefore, the project is consistent with LCP Policies C-12, C-13 and C-14.

Wetlands

Section 30233 of the Coastal Act and LCP Policies C-4 and C-10 set forth specific limitations on uses allowable in wetlands. The limitations are generally defined in a 3-part test as follows:

1. The purpose of the project is limited to one of eight allowable uses identified in Section 30233;

2. The project has no feasible less environmentally damaging alternative; and

3. Adequate mitigation measures to minimize the adverse impacts of the proposed project on habitat values have been provided.

Proposed airfield projects would be located within the existing airfield, primarily within developed areas or immediately adjacent to existing runways and taxiways. The Taxiway H Airfield Safety Project would be located on the north side of the airfield and would involve some extension of development into an undeveloped area currently zoned as G-S-R (see **Exhibit 4H**). Based on a preliminary wetlands inventory and vegetation mapping conducted on the Airport (Dudek 2012), the infield areas where runway and taxiway improvements are proposed, although consisting of non-native annual brome grassland (ABG) and dredge spoil or work areas (DRDG) (refer to **Exhibit 4B**), could contain wetlands as defined by CCC and/or USACE/RWQCB due to the presence of hydrophytic vegetation (refer to **Exhibit 4C**).

Additional surveys prior to actual development would be necessary to delineate the exact limits of jurisdiction. Any portion of the project involving improvements that result in temporary or permanent fill in wetlands trigger

the 3-part test for projects involving wetland fill as required by Coastal Act Section 30233 and LCP Policies C-4 and C-10.

1. Allowable Use

Pursuant to the first of these tests, a project must qualify as one of the eight stated uses allowed under Section 30233(a). As it relates to Master Plan projects that have the potential to impact wetlands, Section 30233(a)(5) of the Coastal Act authorizes fill for "*Incidental public service purposes, including but not limited to, burying cables, pipes or inspection of piers and maintenance of existing intake and outfall lines"* and LCP Policy C-9 requires that *"Any development approved within or adjacent to the wetland areas identified on the habitat map shall have been found to be consistent with PRC's sections 30233, 30230, 30231 and 30607.1."*

Previous CCC findings for airfield safety projects resulting in wetland impacts at the Airport have concluded that fill for the expansion of existing runways/taxiways may constitute an "incidental public service purpose" if: (1) there is no less damaging feasible alternative; (2) the fill is undertaken by a public agency in pursuit of its public mission; and (3) the expansion is necessary to maintain existing capacity.

The 2013 Demand/Capacity Analysis for the Airport concludes the following:

The 2011 operations level equated to 48 percent of the airfield's annual service volume. By the long-term planning horizon, total annual operations are expected to represent 65 percent of annual service volume.

FAA Order 5090.3C, *Field Formulation of the National Plan of Integrated Airport Systems* (NPIAS), indicates that improvements for airfield capacity purposes should begin to be considered once operations reach 60 to 75 percent of the annual service volume. Since this range is not anticipated to be reached at Santa Barbara Airport until the long-term timeframe, major capacity improvements such as new runways are not considered necessary during the planning horizon.

Accordingly, none of the Master Plan project elements that could potentially impact wetlands would increase the operational capacity of the Airport, but are specifically intended to meet FAA design standards for safety and to improve the operational efficiency, circulation and capability of the airfield. The improvements are necessary to eliminate and/or minimize safety hazards associated with a number of "Hot Spots," identified by the FAA as a location in the Airport's movement area with a history of potential risk or collision or runway incursion, and where heightened attention by pilots is necessary. The location and design of the proposed airfield improvements have been

determined based on FAA design standards and the location of existing facilities, i.e., most of the runway and taxiway improvements consist of minor, linear expansions that must occur immediately adjacent to existing runways and taxiways. In the case of the Taxiway H Airfield Safety Project, the location and design is based on the most feasible, least environmentally damaging location, which avoids sensitive vegetation communities and provides maximum setbacks from Carneros and Tecolotito Creeks and Goleta Slough.

In conclusion, the Master Plan airfield improvements would not increase the operational capacity of the Airport and are necessary to ensure the safe and efficient operations of one of the region's primary public transportation systems providing coastal access to Santa Barbara and nearby coastal communities. In addition, the improvements are the least environmentally damaging, feasible alternative (see following discussion). Therefore, the project may be considered an allowable use for wetland fill pursuant to Coastal Act Section 30233 and LCP Policies C-4 and C-10.

2. The Project has no Feasible, Less Environmentally Damaging Alternative

The location and design of the proposed airfield improvements have been determined based on FAA design standards and the location of existing facilities. The runway and taxiway improvements consist of minor, linear expansions that must occur immediately adjacent to existing runways and taxiways. The location and design of the Taxiway H Airfield Safety Project avoids sensitive vegetation communities and provides maximum setbacks from adjacent resources associated with Carneros and Tecolotito Creeks and Goleta Slough. There are no alternative design or configuration options available that would allow for project implementation and avoid or reduce temporary or permanent impacts to wetlands. The No Project Alternative would result in reduced safety and/or efficiency of the Airport transportation, thereby adversely impacting maximum coastal access opportunities to the region's coastal communities. Thus, the project may be found consistent with Coastal Act Section 30233.

3. Adequate Mitigation Measures are Provided

Potential impacts to wetland resources would affect only degraded wetland areas consisting of non-native annual brome grassland (ABG) and dredge spoil or work areas (DRDG) (refer to **Exhibit 4B**). Nonetheless, should it be determined that impacts to wetlands would occur from the airfield projects, adequate mitigation measures to minimize adverse impacts on habitat values would be provided. A project-specific wetland mitigation plan would be prepared to determine sufficient mitigation for impacted resources based on a site-specific evaluation of the resource's function and values (see Section

4.2.7). Therefore, the project may be found consistent with Coastal Act Section 30233.

While the Taxiway H Airfield Safety Project would affect areas not immediately adjacent to existing facilities, the improvements would be located in proximity to an existing runway and the project location maximizes setbacks from adjacent creeks and Goleta Slough to the extent feasible.

The extension of Taxiway H would encroach into the G-S-R zone as identified on the City's zoning map, and although the Taxiway H Airfield Safety Project area is also zoned A-A-O, a project-specific analysis would be necessary to determine: 1) the extent of impacts to wetland habitat, if any; 2) feasibility of appropriate mitigation measures based on type and level of impacts on resource functions and values; and 3) overall compatibility of the taxiway Airfield Safety Project with the open space character of the GSER. Should a project-specific evaluation conclude that the Taxiway H Airfield Safety Project would not preserve the wetland as it exists or improve the habitat values of the Goleta Slough Reserve, an LCP amendment would be required to change the zoning of the proposed project area.

A full analysis of this project's consistency with the policies of the Airport's LCP and the G-S-R zoning would be conducted during the LCP amendment process and would address any potential policy consistency issues associated with adverse impacts to wetlands, wetland buffers (Policy C-4), long-term protection of Goleta Slough habitats and open space (Policies C-8, C-9 and H-1), and consistency with the Slough Management Plan (Policy C-10). See related analysis under Section 4.2.4 Impact BIO-1, and Impact LU-4 below. The City of Santa Barbara will consider the initiation of an LCP amendment and rezone for the portion of a future Taxiway H Airfield Safety Project that would occur within the G-S-R zone after formal adoption of the proposed Master Plan (refer to Section 2.4, Required Discretionary Actions, and Impact LU-6 below).

Environmentally Sensitive Habitat Areas

The majority of the airport improvements would be located in areas that are currently developed and therefore have no potential to impact ESHAs. Airfield improvements would occur in areas mapped as non-native annual brome grassland and dredge spoil or work areas, which are located immediately adjacent to or in proximity to existing facilities, and therefore have a low potential to contain ESHA. The location and design of the Taxiway H Airfield Safety Project avoids sensitive vegetation communities and provides maximum setbacks from adjacent resources associated with Carneros and Tecolotito Creeks and Goleta Slough, specifically avoiding development encroachment near the scrub and wetland habitats occurring southwesterly

of the existing airfield facilities (refer to **Exhibit 4B**). No improvements would occur in habitat areas known to support special-status species.

Consistent with LCP policies addressing potential impacts to sensitive habitats and species, potential indirect impacts to ESHA and special-status species would be identified and mitigated during project-specific environmental review to ensure mitigation measures would be implemented to protect sensitive habitat and species, and to ensure provisions of appropriate setbacks/buffers between development and ESHA. These buffers are necessary to ensure adjacent land uses are developed and maintained compatible with the continuance of habitat areas and to address potential short-term construction activity impacts that could inadvertently encroach into ESHA or occur during important roosting, breeding, foraging, migrating and nesting periods for special-status species. Compliance with the LCP's ESHA protection policies and identified project-specific mitigation measures would ensure that new development for the Master Plan would be implemented in a manner to protect ESHA and sensitive status species.

Public Access/Recreation

The proposed Master Plan does not raise issues of consistency relative to the public access and recreation policies of the Coastal Act or LCP as the projects are necessary to ensure the safe and efficient operation of one of the region's primary public transportation systems providing coastal access to Santa Barbara and nearby coastal communities. The proposed Master Plan would not result in intensification of the use of the existing facilities. A traffic study of the Master Plan projects has been prepared and is included in ~~this~~ the Recirculated Draft Program EIR as Appendix C (see also Section 4.8). No significant project-specific or cumulative traffic impacts would occur as a result of the proposed Master Plan and proposed development would not interfere with the public's right of access to the sea. In addition, the project would have no adverse effect on public access and recreational opportunities on airport property beyond those limitations presently established at the Airport to ensure safe and secure airport operations.

Visual Resources

The proposed Master Plan does not raise issues of consistency relative to Coastal Act or LCP policies which require scenic and visual qualities of coastal areas be considered and protected, that new development protect views to and along the ocean and scenic coastal areas, and that development be consistent with the character and quality of Santa Barbara. Development of the proposed Master Plan projects would involve improvements predominantly constructed at grade, in the case of airfield projects, and new buildings would be located in developed areas of the Airport adjacent to

existing structures. No grading or new buildings are proposed that would alter natural landforms. Areas proposed for new buildings or expansions are not located in the immediate vicinity of coastal resources and would not obscure ocean or coastal views or impact the visual quality of the coastal area. All new lighting and developed areas associated with the proposed Master Plan would remain on the airfield and other developed portions of the Airport. From off-site areas, such as adjacent streets, the property would continue to look like a developed airport with no noticeable change in its appearance. Therefore, the project may be found consistent with Coastal Act Section 30251 and LCP Policy E-1.

Cultural Resources

The proposed Master Plan projects may potentially result in impacts to archaeological or other culturally sensitive resources. Proposed development located in the northeast corner of the Airport, south of Hollister Avenue, would occur partially in areas designated in the City's *Master Archaeological Resource Assessment* (MARA) study as Low sensitivity for Native American Resources and an area proposed for development south of the Terminal is designated as Moderate sensitivity for Native American Resources.

Master Plan project work would generally be limited to excavation and grading to remove existing pavement and construction of new pavement and foundations in developed areas. However, trenching for utilities may require deeper subsurface disturbance and could potentially affect unknown cultural resources at the site. LCP Policy F-3 requires mitigation and monitoring of activities that could affect sensitive cultural or archaeological resources including the requirement for onsite monitoring by a qualified archaeologist or resource specialist and an appropriate Native American consultant of all ground disturbing activities. Compliance with Policy F-3, the City's MARA, and standard City conditions of approval would ensure protection of cultural resources (refer to Section 4.3.7).

Public Services

The project is consistent with Section 30254 of the Coastal Act and LCP Policy G-1 as adequate public services such as water, wastewater, traffic circulation, and parking would be available to meet the needs generated by the proposed project. Future landfill capacity is currently constrained in the region and the Airport would be required to comply with citywide measures to reduce its waste stream. However, in terms of its consistency with this section of the Coastal Act, the Airport is a basic service that is vital to the economic health of both the region and the nation.

Hazards

Almost the entire Airport is located within the 100-year floodplain. Base flood elevations have been determined for development of new buildings which would ensure potential flood hazards would be minimized. The only proposed projects within a mapped floodway would be the westernmost extension of Taxiway H, the removal of an existing maintenance yard, and the future relocation of historic buildings Nos. 248 and 249. As the Taxiway H Airfield Safety Project would consist only of an at-grade facility and does involve construction of structures, it is not expected to impede surface floodwater flows in the event of a 100-year flood.

The project site, and the region as a whole, is subject to seismic activity. Potential hazards related to seismic activity include: fault displacement and ground shaking (primarily from nearby historically active More Ranch fault), liquefaction, and tsunamis. Compliance with the City's Seismic/Safety and Conservation Elements and project-specific mitigation measures would ensure new development would be designed and constructed to minimize these risks.

An increase in emissions, including GHG emissions, would occur over the 20-year planning horizon of the Master Plan. However, the Airport has in place a *GHG Inventory and Carbon Footprint Reduction Plan* (City of Santa Barbara 2007). Sea level rise is a concern for much of coastal Santa Barbara and studies are underway to evaluate potential sea level rise scenarios at the Airport which will help to assess potential risks to airport facilities.

Result LU-4: **The proposed Master Plan would not conflict with any applicable LCP policy adopted for the purpose of avoiding or mitigating an impact to coastal resources. However, recommended projects, such as the proposed Taxiway H Airfield Safety Project, could result in inconsistencies with LCP policies related to Goleta Slough. See Section 4.6.7 for programmatic measures to be applied to future development projects occurring under the proposed Master Plan, and Section 4.2.7 for programmatic mitigation measures provided to ensure consistency with LCP policies for the protection of the Slough. Implementation of these measures would mitigate future potential impacts of the proposed Master Plan to coastal resources and ensure consistency with applicable LCP policies. Potential impacts of adoption of the proposed Master Plan would be Class II, Less than Significant Impact with Mitigation.**

General Plan Designation/Zoning Considerations/Goleta Slough Ecological Reserve

Impact LU-5: Most of the future actions discussed in the Master Plan would occur on portions of the Airport are designated as Airport in the City General Plan and zoned for airport-related activities (A-A-O or A-F) and would be consistent with

the underlying designation and zoning. Two exceptions, however, would be at the off-site parcels where the Airport is seeking avigation easements over Airport runway protection zones (RPZs).

The recommended northern RPZ easement would occur over a property within the City of Goleta that is designated as Business Park (City of Goleta 2008) and zoned for M-RP, Industrial Research Park and M-S-GOL, Service Industrial – Goleta. This property is currently developed with a light industrial building and a parking lot. Given that the building does not penetrate any Part 77 airspace surfaces, it would not need to be removed. The avigation easement, if obtained by the Airport, would prevent the property owner from making improvements to the property that would conflict with Airport safety objectives. These restrictions on the use of the property would not conflict with the specifications of the underlying zoning and land use designations.

On the south side of the Airport, the off-site RPZ would occur over a small parcel of land within Santa Barbara County designated as PU, Public Utility and REC, Recreation. The parcel is owned by Caltrans and developed as a State highway (State Route [SR] 217). Again, an avigation easement would prevent the property owner from making improvements to the property that would conflict with Airport safety objectives. These restrictions on the use of the property would not conflict with the specifications of the underlying zoning and land use designations.

Result LU-5: **No conflicts to the City of Goleta's land use designations or zoning would occur from proposed avigation easements. Land use impacts of these easements would be Class III, Less than Significant Impact.**

Impact LU-6: A few of the airfield safety improvements discussed in the Master Plan, specifically the Taxiway H Airfield Safety Project and its associated actions, would occur in the G-S-R zone and would likely require a portion of the G-S-R/A-A-O zoning to be rezoned exclusively as A-A-O (refer to **Exhibit 4H**). The project would also require an amendment to the GSER boundary, an LCP amendment, and a General Plan amendment. It would be subject to a CDP and would be permitted as an incidental public service project only if there is no feasible less environmentally damaging alternative and if feasible mitigation measures have been provided to minimize adverse environmental effects (*Airport Zoning Ordinance*, section 29.25.030B). In addition, the CDFW is a Trustee Agency of resources in the GSER. Any changes to the GSER boundaries are, therefore, subject to the City's Cooperative Agreement with the CDFW (dated August 25, 1987, as amended).

Result LU-6: **The proposed Taxiway H Airfield Safety Project and its associated actions could result in inconsistencies with the G-S-R zone and General Plan land use designation that protects the GSER. Amendments to planning documents**

and agreements would be necessary to establish policy consistency. Mitigation is, therefore, ~~proposed~~ identified to ~~allow~~ provide for the necessary General Plan and LCP amendments, rezone, and amendment to the City's Cooperative Agreement with CDFW. Assuming that the necessary CDPs, General Plan and LCP amendments, ~~and~~ rezones, and Cooperative Agreement are approved, land use and planning impacts of recommended projects within the G-S-R zone (and associated General Plan land use designation) would be Class II, Less than Significant Impact with Mitigation since the projects would not "conflict with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact." (Refer also to Section 4.2.7, BIO/mm-1 for programmatic mitigation measures provided to ensure consistency with LCP policies for the protection of the Slough.)

4.6.5 Regional (Cumulative) Impacts

Regional plans that are applicable to the Airport include the County APCD/SBCAG's 2010 and 2013 CAPs, RWQCB's Basin Plan, and SBCAG's *2040 Regional Transportation Plan and Sustainable Communities Strategy* (2013). Consistency with these plans is addressed in Sections 4.1.5, 4.5.5, and 4.7.5, respectively. No significant inconsistencies with these plans would occur since the proposed Master Plan is consistent with the City's General Plan and operates under an approved NPDES permit. In addition, as previously discussed in Section 4.2.5, other projects within the coastal area are subject to their own LCP policies and CDP processes, which address cumulative impacts and provide mitigation for sensitive coastal resources.

As discussed previously in Sections 2.5 and 4.6.2, SBCAG's existing ALUP is being updated in the form of an ALUCP, per the Caltrans Handbook. The proposed Master Plan, if approved, would be incorporated into the next ALUCP update, as necessary.

4.6.6 Comparative Impacts of Alternatives

No Project Alternative

Similar to the project as proposed, the No Project alternative would be consistent with all applicable plans and policies and would not involve any improvements that have the potential to impact established communities. However, the No Project alternative would not involve improvements within the GSER and, thus would not require a rezone or General Plan/LCP amendments. Mitigation for impacts to biological resources protected by the G-S-R zone and LCP would not be required. Therefore, this alternative has less potential to create land use impacts than the project as proposed.

Environmentally Superior Alternative

Similar to the project as proposed, the Environmentally Superior alternative would be consistent with all applicable plans and policies and would not involve any improvements that have the potential to impact established communities. Like the No Project alternative, however, the Environmentally Superior alternative would not involve improvements within the GSER and, thus would not require a rezone or General Plan/LCP amendments. Mitigation for impacts to biological resources protected by the G-S-R zone and LCP would not be required. Therefore, this alternative has less potential to create land use impacts than the project as proposed.

4.6.7 Mitigation Measures

Standard City mitigation measures may be required for specific construction or demolition projects recommended by the proposed Master Plan, as determined by project-specific environmental review. These measures would be implemented at the project level by the City to mitigate potential construction-related impacts on the surrounding neighborhoods. (Refer to Initial Study, Appendix A of the Draft Program EIR**,** Section 7, Noise.)

Sections 4.1.7, 4.2.7 and 4.5.7 of this ~~Recirculated~~ Program EIR list programmatic mitigation measures that would ensure consistency with applicable City and regional plans adopted for the purpose of avoiding or mitigating an environmental effect. These measures have been incorporated into the Mitigation Monitoring and Reporting Plan (Chapter Seven) for the proposed Master Plan.

Mitigation Measures for Land Use Impacts LU-4 and LU-6

The following programmatic measures have been incorporated into the Mitigation Monitoring and Reporting Plan (Chapter Seven) for the proposed Master Plan. Implementation of these measures would serve to avoid or mitigate future potential impacts of the proposed Master Plan to coastal resources and ensure consistency with applicable LCP policies and the G-S-R zone/General Plan land use designation for the GSER. Therefore, potential impacts of recommended projects within the proposed Master Plan would be Class II, Less than Significant Impact with Mitigation.

LU/mm-1: **A detailed project-specific impact analysis and mitigation program for the Taxiway H Airfield Safety Project, and associated analysis of the project's consistency with the G-S-R zone and the policies of the Airport's LCP and *California Coastal Act*, shall be conducted during the CDP and LCP amendment review process. The analysis shall specifically address project alternatives, mitigation, and/or additional LCP policy requirements necessary to ensure that any permitted impacts to wetland and sensitive habitat and associated buffers will be adequately minimized and mitigated to ensure long-term protection of Goleta Slough habitats and open space.**

LU/mm-2: **A consistency review of the Taxiway H Airfield Safety Project with the Slough Management Plan shall be conducted during the project-specific CDP and/or LCP amendment review process, as applicable. Project-specific mitigation measures shall be identified and incorporated into the City's CDP, and/or LCP policies shall be identified and incorporated into Airport LCP, where determined necessary and feasible, to ensure project consistency with the Slough Management Plan. Required mitigation shall also be evaluated for consistency with the Slough Management Plan restoration goals.**

LU/mm-3: **The City of Santa Barbara ~~and the CDFW~~ shall undertake a process in coordination with the CDFW toward amending~~amend~~ the Cooperative Agreement dated August 25, 1987 (as revised) for the maintenance and management of the Goleta Slough to accommodate the Taxiway H Airfield Safety Project and establish its consistency with the Cooperative Agreement. Amendments to be considered shall include an ~~to~~ adjustment of the boundaries of the GSER to exclude the Taxiway H Airfield Safety Project site, and ~~to include~~inclusion of a site of similar habitat value at an area ratio of 1:1 (i.e., if Taxiway H and associated actions removes 11 acres from the GSER, 11 acres would be added to the GSER from available Airport property adjacent to the Slough). ~~This~~ Such a mutually-accepted exchange shall be in addition to required biological mitigation. The Cooperative Agreement amendment shall be presented to the California Fish and Game Commission for concurrence.**

4.7 PUBLIC UTILITIES (SOLID WASTE DISPOSAL)

4.7.1 Environmental and Regulatory Setting

The closest landfill to the Airport is the Tajiguas Landfill, located at 14470 Calle Real, approximately 15 miles west of the Airport and owned and operated by the County of Santa Barbara. This landfill serves the South Coast and the Santa Ynez and New Cuyama Valleys and can process up to 1,500 tons of trash per day (County of Santa Barbara 2014). Waste is hauled via large transfer trucks to the landfill where it is covered daily. A County-owned and -operated South Coast Recycling and Transfer Station is located at 4430 Calle Real between Goleta and Santa Barbara and acts as a consolidation point for small loads of waste. The South Coast Recycling and Transfer facility is permitted to process up to 550 tons of waste per day disposal (City of Santa Barbara 2010).

Approximately 44 percent of the total annual tonnage disposed of at Tajiguas Landfill is generated within the City of Santa Barbara. It is estimated that Tajiguas Landfill will have sufficient capacity to accept waste until 2023, at which time new measures to accommodate waste, such as an additional in-County landfill or out-of-County disposal facilities will become necessary. The County has reviewed a variety of options for siting a new landfill in the North County and determined that an alternate approach to landfill disposal would be environmentally preferable.

One option under consideration is the construction of a waste-to-energy conversion facility at Tajiguas Landfill. In addition, Los Flores Integrated Waste Management Facility (IWMF), located just south of the City of Santa Maria, is currently under development. The City of Santa Maria has indicated that they would accept South Coast waste and, if permitted, Los Flores IWMF would possess adequate permitted capacity to handle the City of Santa Barbara's waste for more than 100 years (S. Kahn, personal communication, 2014). Per the *California Integrated Solid Waste Management Act* (A.B. 939), the Countywide Siting Element was amended to include Las Flores IWMF in 2011. Currently, the Las Flores IWMF has completed its CEQA process and received its permits from the California Integrated Waste Management Board and the RWQCB. The facility is scheduled to open by 2020 and will have a capacity of 108 million cubic yards (S. Kahn, personal communication, 2014).

There are no estimates available for the amount of solid waste generated at the Airport since each tenant is responsible for scheduling their own trash pick-up; however, since the Airport is owned by the City of Santa Barbara, its waste generation was included in the citywide estimates within the recent General Plan (*Plan Santa Barbara*) and Final General Plan EIR. The Airport is also served by recycling pick-up. Business and multi-unit residential recycling materials collected in dumpsters, roll-off boxes, and trash compactors are taken to the MarBorg Material Recovery Facility, located in the Airport Industrial Area (AIA).

Regulatory Setting

State

The *California Integrated Solid Waste Management Act* was enacted in 1989. This law requires that each municipality in the State divert at least fifty percent of its solid waste from landfill disposal through source reduction, recycling and composting by 2000. The City diverts approximately 66 percent of its solid waste and approximately 96 percent of construction waste that is recyclable from landfill disposal (City of Santa Barbara 2010).

Regional/Local

The *Countywide Integrated Waste Management Plan* (CIWMP) (1997) contains countywide goals and objectives for integrated waste management planning. The County of Santa Barbara, which operates the landfills, has developed impact significance thresholds related to the impacts of development on remaining landfill capacity (see Section 4.7.3 below). The County thresholds are based on the projected average solid waste generation for Santa Barbara County from 1990-2005. These thresholds are utilized by the City to analyze solid waste impacts.

The City has a Construction and Demolition Ordinance requirement to divert 75 percent of total construction waste.

4.7.2 Applicable Plans and Policies

The following policy of the City General Plan's Public Services and Safety Element is applicable to solid waste generation and disposal at the Airport.

> PS8. Solid Waste Management Programs. Continue and expand City recycling programs for resource reduction, reuse, and recycling of solid waste.

4.7.3 Impact Evaluation Methodology and Significance Criteria

According to the City's CEQA significance criteria, a significant impact would occur if a project would create a "substantial increase in solid waste disposal to area sanitary landfills." The City uses the County's significance threshold of 196 tpy for project-specific impacts. This amount represents five percent of the expected average annual increase in solid waste generation [4,000 tpy]). However, source reduction, recycling, and composting can reduce a project's waste stream by as much as 50 percent. If a proposed project generates 196 tpy or more after reduction and recycling efforts, project-specific impacts would be considered significant and unavoidable.

Proposed projects with a project-specific impact as identified above (196 tpy or more) would also be considered cumulatively significant, since the project-specific threshold of significance is based on a cumulative growth scenario. Because landfill space in the County is already extremely limited, any increase in solid waste of one percent or more of the expected average annual increase in solid waste generation [4,000 tpy], which equates to 40 tpy, is considered an adverse significant cumulative impact.

Any construction, demolition or remodeling project of a commercial, industrial or residential development that is projected to create more than 350 tons of construction and demolition debris is also considered by the County to have a significant impact on solid waste generation. This 350-ton threshold for construction, demolition, or remodeling has not been formally adopted by the City; however, the City's Construction and Demolition Ordinance requires that each project divert 75 percent of its total construction waste.

4.7.4 Project-Specific Impacts

Operational Impacts

Impact SW-1: Using the methodology from the City's General Plan EIR, non-residential development in the City generates an average of approximately 0.89 tpy per 1,000 square feet (tsf) after recycling and diversion efforts. This is based on existing levels of non-residential development and the volumes of solid waste generated and disposed of by the City (includes a 70 percent reduction from recycling efforts).

An estimate of future solid waste generation from the Airport's proposed Master Plan is difficult to quantify at this time. The recommended redevelopment includes the removal of three buildings totaling 22,866 square feet (sf) in the intermediate-term planning horizon and another four buildings totaling 23,258 sf in the long-term planning horizon (**Table 4K**). It is assumed, for purposes of this analysis, that the square footage of any replacement development would be approximately the same as the buildings that are removed and no significant additional solid waste generation would occur. Similarly, the relocation of the maintenance yard and the Airport's administrative office would not result in significant amounts of new solid waste generation since these improvements would also be taking the place of existing land uses at the Airport that currently generate solid waste.

However, some of the Master Plan's recommended development would be planned by individual lessees, such as FBOs; the net change in building square footage for these areas is unknown at this time. In addition, a 16,190-sf expansion of the Terminal is planned over the course of the Master Plan planning horizon. These changes in land use could result in additional operational solid waste generation.

Long-term generation of solid waste would not occur from the various airfield safety projects, fence replacement, or avigation easements identified in the proposed Master Plan.

TABLE 4K
Buildings Proposed to be Removed
Santa Barbara Airport

Short Term (1-5 years)	Intermediate Term	(6-10 years)	Long Term	(11+ years)
Building No./Square Feet	Building No.	Square Feet	Building No.	Square Feet
NONE	121	12,012	303	6,240
	122	6,400	344	11,408
	271	4,454	304	3,960
			313	1,650
Total: 0		Total: 22,866		Total: 23,258

Source: Draft Final Santa Barbara Airport Master Plan, revised October 2014.
* Unoccupied; no solid waste is currently being generated. Buildings would not be replaced due to their location within the floodway.

Result SW-1: **Future projects recommended by the proposed Master Plan are expected to be well below the City's 196-tpy project-specific threshold. For example, a 16,190-sf future expansion of the Terminal could generate an estimated additional 14.4 tpy of solid waste (16.190 tsf x 0.89 = 14.4 tpy). To reach the 196-tpy threshold, an individual project would need to increase the net square footage on a particular parcel by almost 175,000 sf. Thus, project-**

specific long-term (operational) impacts for solid waste disposal would be <u>Class III, Less than Significant Impact</u>.

Construction and/or Demolition Impacts

Impact SW-2: Construction or demolition waste generation would need to be calculated on a project-specific basis as part of each individual project's environmental review. Estimations should include both solid waste generation prior to any recycling or diversion and total short-term solid waste after implementation of the City's Construction and Demolition Ordinance requirement to divert 75 percent of total construction waste.

Any future projects that would generate 350 tons or more of construction and demolition debris are considered to have a potentially significant impact in the short term. According to the County's *Environmental Thresholds and Guidelines Manual* (2008), the following types of commercial/industrial projects are estimated to reach the County's thresholds of significance for construction or demolition debris:

- remodeling projects over 17,000 sf;
- demolition projects over 7,000 sf; and
- new construction projects over 28,000 sf.

As can be seen in **Table 4K**, there are at least three buildings planned to be removed that are over 7,000 sf in size. Additional buildings larger than 7,000 feet may also be removed depending on decisions made by future FBOs located in the new FBO lease parcels provided by the proposed Master Plan. Future construction within these lease parcels are not likely to be over the 28,000-sf threshold for new construction projects, but are not necessarily prohibited by the proposed Master Plan.

Result SW-2: **Given the amount of potential building demolition or construction that could occur under the proposed Master Plan, it is possible that some recommended projects could be above the County's threshold for demolition and construction debris. These demolition and construction impacts would be mitigated by compliance with State and City diversion requirements (see Section 4.7.7 below). Thus, the project's potential demolition and construction solid waste disposal impacts would be <u>Class II, Less than Significant Impact with Mitigation</u>.**

4.7.5 Regional (Cumulative) Impacts

Impact SW-3: If implementation of the proposed Master Plan accomplishes a net increase of approximately 45,000 sf of building space due to redevelopment at the Airport, operational solid waste generation above the City's cumulative threshold of 40 tpy could result. This may or may not actually occur depending on redevelopment within the future FBO lease parcels. However, *Plan Santa Barbara* assumed two million sf of new non-residential growth, including additional development at the Airport, within the City through the year 2030. This citywide growth would incrementally contribute to impacts associated with the limited remaining capacity of the Tajiguas Landfill, which is estimated to reach capacity by 2023. This potentially significant cumulative impact has already been identified in the Final General Plan EIR ~~(on which this EIR is tiered)~~. No additional cumulative impact to solid waste disposal would occur as a result of the proposed Master Plan.

Mitigation measures in the Final General Plan EIR direct the City to continue coordination with the County on a waste-to-energy facility and to further investigate other potential options for replacement landfill capacity at regional facilities. The Final General Plan EIR also includes measures to further reduce specified waste components associated with business practices, to expand organics and recycling programs, to create opportunities for additional materials reuse, and to protect recycling markets.

Result SW-3: **The proposed Master Plan could result in development that generates additional solid waste in excess of the City's cumulative threshold; however, this cumulative impact has already been addressed in the City's Final General Plan EIR. With continuing and proposed City policies and programs, including those in *Plan Santa Barbara,* potential cumulative impacts associated with waste disposal capacity due to the proposed Master Plan would be Class III, Less than Significant Impact.**

4.7.6 Comparative Impacts of Alternatives

No Project Alternative

Under the No Project alternative, existing land uses at the Airport would continue to generate solid waste at their present rates. Overall, the total amount of building space on the Airport (and associated solid waste generation) cannot be accurately compared to what may occur under the project as proposed since the proposed Master Plan allows for the FBO lease parcels to be developed by the individual lessees at a later date. Thus, the difference in net solid waste generation between the No Project alternative and the project as proposed in the long term cannot be determined.

Short-term solid waste generation from construction and/or demolition would be less since the only projects to occur under this alternative would be general maintenance projects.

Environmentally Superior Alternative

The Environmentally Superior alternative would generate operational solid waste at a similar rate as the project as proposed since the only projects that would not occur under this alternative are ones that would not generate solid waste. For example, the proposed Taxiway H extension and related actions are infrastructure projects that do not produce solid waste.

Construction solid waste under this alternative would be less than the project as proposed since the taxiway project would not be built.

4.7.7 Mitigation Measures

No additional mitigation is necessary for long-term or cumulative (operational) solid waste impacts by the project since growth anticipated at the Airport was considered in the City's General Plan and Final General Plan EIR. As a City-owned and operated facility, the Airport will comply with Policy PS8 of *Plan Santa Barbara* as well as any implementation actions undertaken by the City.

To ensure that no significant or cumulative impacts related to construction/demolition solid waste occur as a result of recommended projects, the following programmatic measure has been incorporated into the Mitigation Monitoring and Reporting Plan (Chapter Seven) for the proposed Master Plan. This measure would reduce potential construction/demolition solid waste impacts to a less than significant level.

SW/mm-1: **As a condition of approval, projects recommended by the proposed Master Plan must feasibly reduce, reuse, and recycle demolition and construction waste consistent with State and City diversion goals in place at the time.**

4.8 TRANSPORTATION/TRAFFIC

4.8.1 Environmental and Regulatory Setting

Exhibit 4L shows the street network surrounding the Airport and existing traffic volumes (based on traffic counts taken in April 2015 for this Program EIR work effort). The roadway segments studied within this Program EIR are listed below. Impacts to the regional circulation network, for example, US 101 and SR 217, have already been addressed as part of the City of Santa Barbara's Final General Plan EIR, which included moderate growth at the Airport and, thus, have not been re-evaluated in this Program EIR.

Hollister Avenue:

- East of eastbound (EB) SR 217;
- Between Kellogg Avenue and westbound (WB) SR 217;
- Between South Fairview Avenue and Kellogg Avenue;
- West of South Fairview Avenue;
- East of Los Carneros Way;
- Between South Los Carneros Road and Los Carneros Way;
- West of South Los Carneros Road.

South Fairview Avenue:

- North of Calle Real;
- Between Calle Real and US 101;
- Between US 101 and Hollister Avenue;
- Between Hollister Avenue and Airport access across from Matthews Street;
- Between Airport access across from Matthews Street and James Fowler Road.

James Fowler Road:

- Between South Fairview Avenue and Terminal access.

William Moffett Place:

- Between Terminal access and SR 217.

South Los Carneros Road:

- North of US 101;
- Between US 101 and Calle Koral;
- Between Calle Koral and Hollister Avenue;
- South of Hollister Avenue.

Los Carneros Way:

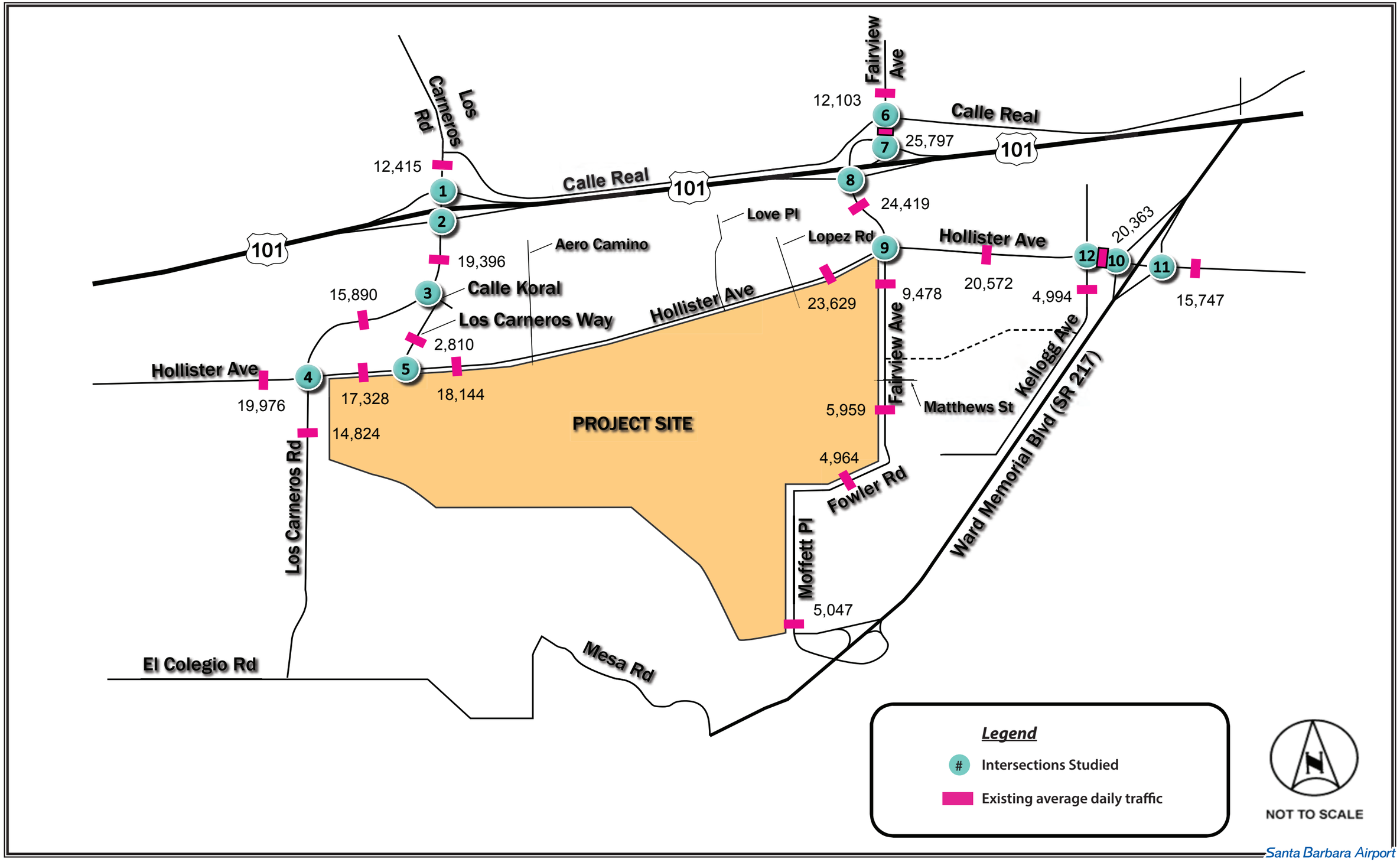
- Between Calle Koral and Hollister Avenue.

Kellogg Avenue:

- South of Hollister Avenue.

The following provides a description of the existing street system within the vicinity of the project area.

Hollister Avenue is a four-lane divided arterial roadway that forms the north boundary of the Master Plan area. Within the study area, Hollister Avenue has two travel lanes in each direction with a raised or painted center median and left turn pockets at side street intersections and driveways. Class II bike lanes are provided on both sides of the street. Hollister Avenue provides the primary east-west surface street route through the City of Goleta and is identified as part of SBCAG's *Congestion Management Plan* (CMP) network (SBCAG 2009). It is also listed as a Local Scenic Corridor on Figure 6-1 of the *Goleta General Plan/Coastal Land Use Plan* (City of Goleta



Source: Kimley Horn Associates 2016

Santa Barbara Airport

Exhibit 4L

SURROUNDING STREET NETWORK AND EXISTING (2015) TRAFFIC VOLUMES

2009). Scenic views to be protected include views south across the Airport from Hollister Avenue at South Los Carneros Road and at South La Patera Lane.

South Fairview Avenue is a two- to four-lane divided arterial roadway that runs along the east side of the Airport. South of Hollister Avenue, South Fairview Avenue has one travel lane in each direction with a painted center median and left turn pockets at side street intersections and driveways. North of Hollister Avenue, South Fairview Avenue is a four-lane roadway connecting with US 101. Class II bike lanes are provided on both sides of the street. South Fairview Avenue is identified as part of the SBCAG CMP network (SBCAG 2009).

James Fowler Road turns into South Fairview Avenue at its eastern end. James Fowler Road provides direct access to the Terminal, short-term parking lot, and long-term parking Lot 1. James Fowler Road is classified as a minor arterial roadway and has one travel lane in each direction with left turn pockets at side street intersections and driveways. Class II bike lanes are provided on both sides of the street.

William Moffett Place turns into James Fowler Road at its northern end. William Moffett Place provides access to the Terminal passenger pick-up/drop-off area and rental car facility and connects SR 217 with the Airport. William Moffett Place is classified as a minor arterial and has one travel lane in each direction with left turn pockets at side street intersections and driveways. Class II bike lanes are provided on both sides of the street.

South Los Carneros Road is a two- to four-lane divided arterial roadway that runs along the west side of the Airport. South Los Carneros Road has two travel lanes in each direction with a raised center median and left turn pockets at side street intersections and driveways. Class II bike lanes are provided on both sides of the street. The South Los Carneros Road interchange with US 101 is north of Hollister Avenue. South Los Carneros Road is identified as a part of the SBCAG CMP network (SBCAG 2009).

Los Carneros Way is a two-lane divided collector roadway. Los Carneros Way has one lane in each direction with a raised center median and left turn pockets at side street intersections and driveways.

Kellogg Avenue is a two-lane undivided collector roadway providing access to several business and industrial land uses south of Hollister Avenue and to residential uses north of Hollister Avenue.

The following intersections were selected by Airport and City of Goleta planning staff for study within this Program EIR and are also shown on **Exhibit 4L**:

- South Los Carneros Road and US 101 northbound (NB) ramps;
- South Los Carneros Road and US 101 southbound (SB) ramps;
- South Los Carneros Road and Calle Koral;
- South Los Carneros Road and Hollister Avenue;
- Los Carneros Way and Hollister Avenue;

- South Fairview Avenue and Calle Real;
- US 101 NB ramps and South Fairview Avenue;
- South Fairview Avenue and US 101 SB ramps;
- South Fairview Avenue and Hollister Avenue;
- SR 217 WB ramp and Hollister Avenue;
- SR 217 EB ramp and Hollister Avenue; and
- Kellogg Avenue and Hollister Avenue.

All study intersections listed above are controlled by traffic signals. Existing (2015) intersection geometrics are shown on Figure 3-1 of the revised Traffic Impact Study included in ~~this~~ the Recirculated Draft Program EIR as Appendix C.

Tables 4L and **4M** show the existing intersection levels of service (LOS)[15] and average daily traffic (ADT) volumes on surrounding roadway segments. Existing AM (7:00 to 9:00 AM) and PM (4:00 to 6:00 PM) peak-hour turning movement counts were conducted at the intersections under study in April 2015. In addition, 24-hour roadway machine counts along the roadway segments were collected. This traffic volume data is included as an appendix to the Traffic Impact Study (Recirculated Draft Program EIR, Appendix C).[16] Currently (as of April, 2015), all intersections and roadway segments studied in this Program EIR are operating at acceptable conditions (LOS C or better).

Transit

Neither the City of Santa Barbara nor the City of Goleta provides transit service. Rather, Santa Barbara Metropolitan Transportation District (MTD) provides fixed route bus service in southern Santa Barbara County, including the cities of Santa Barbara and Goleta and the community of Isla Vista. In fiscal year (FY) 2007, MTD provided about 7.5 million rides annually. This level of ridership normally represents the ridership of a region with ten times the population of MTD's service area (City of Santa Barbara 2011). There is one bus route that provides bus service to the Terminal and two other routes that pass through the study area. The description of the existing bus routes is described below and as shown on **Exhibit 4M**.

[15] Level of service (LOS) is a measure of congestion on a transportation facility such as an intersection. LOS is represented by the letters A (best) through F (worst). "A" indicates free flow traffic and "F" indicates slow-speed stop-and-go conditions.

[16] As a result of continuous construction projects at the US 101 interchange ramps within the study area, traffic counts could not be conducted without a major ramp closure. When the April 2015 counts were collected, the US 101 NB on-ramp at South Fairview Avenue was closed. To account for the missing on-ramp volumes, traffic volumes from the 2013 Marriott EIR (City of Goleta 2013) were referenced and added on top of existing volumes throughout the study area intersections and roadway segments.

TABLE 4L
Peak-Hour Intersection Level of Service Summary
Existing Conditions Near Santa Barbara Airport

	Intersection	Peak-hour	V/C Ratio [1]	Level of Service[1]
1	S. Los Carneros Rd & US 101 NB Ramp	AM	0.522	A
		PM	0.506	A
2	S. Los Carneros Rd & US 101 SB Ramp	AM	0.540	A
		PM	0.513	A
3	S. Los Carneros Rd & Calle Koral	AM	0.481	A
		PM	0.553	A
4	S. Los Carneros Rd & Hollister Ave	AM	0.458	A
		PM	0.566	A
5	Hollister Ave & Los Carneros Way	AM	0.287	A
		PM	0.425	A
6	S. Fairview Ave & Calle Real	AM	0.617	B
		PM	0.747	C
7	US 101 NB Ramps & S. Fairview Ave	AM	0.627	B
		PM	0.670	B
8	S. Fairview Ave & US 101 SB Ramps	AM	0.489	A
		PM	0.552	A
9	S. Fairview Ave & Hollister Ave	AM	0.575	A
		PM	0.661	B
10	Hollister Ave & SR 217 WB	AM	~~0.537~~ 0.573	A
		PM	~~0.662~~ 0.739	~~B~~ C
11	Hollister Ave & SR 217 EB	AM	~~0.312~~ 0.414	A
		PM	~~0.496~~ 0.583	A
12	Kellogg Ave & Hollister Ave	AM	0.502	A
		PM	0.706	C

Source: Kimley-Horn Associates 2016. (See Recirculated Draft Program EIR, Appendix C, Table 3-1).

V/C = volume to capacity ratio for the intersection based on the Intersection Capacity Utilization (ICU) method.

[1] Based on City of Goleta comments on the Draft Program EIR, traffic was remodeled using Traffix software.

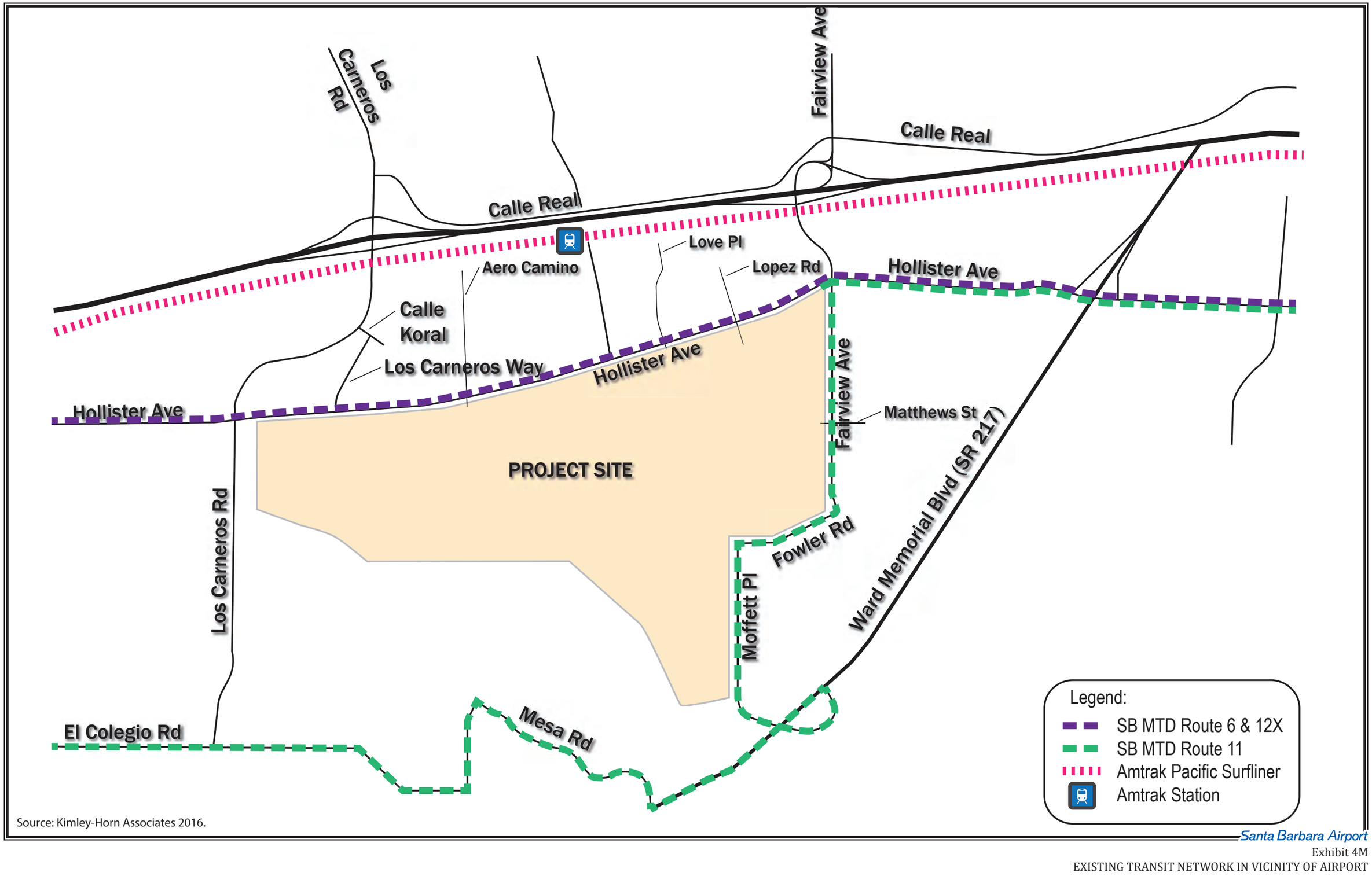
TABLE 4M
Roadway Segment Level of Service Summary
Existing Conditions Near Santa Barbara Airport

Roadway Segment	Roadway Classification[1]	LOS C Capacity	ADT[2]	Exceeds LOS C?
S. Los Carneros Road				
North of US 101	2-Lane Major Arterial	14,300	12,415	No
between US 101 & Calle Koral	4-Lane Major Arterial	34,000	19,396	No
between Calle Koral & Hollister Ave	4-Lane Major Arterial	34,000	15,890	No
south of Hollister Ave	4-Lane Major Arterial	34,000	14,824	No
Los Carneros Way				
between Calle Koral & Hollister Ave	2-Lane Minor Arterial	12,500	2,810	No
Hollister Avenue				
west of S. Los Carneros Rd	4-Lane Major Arterial	34,000	19,976	No
between S. Los Carneros Rd & Los Carneros Way	4-Lane Major Arterial	34,000	17,328	No
east of Los Carneros Way	4-Lane Major Arterial	34,000	18,144	No
west of S. Fairview Ave	4-Lane Major Arterial	34,000	23,629	No
between S. Fairview Ave & Kellogg Ave	4-Lane Major Arterial	34,000	20,572	No
between Kellogg Ave & WB SR 217	4-Lane Major Arterial	34,000	20,363	No
east of EB SR 217	4-Lane Major Arterial	34,000	15,747	No
S. Fairview Avenue				
north of Calle Real	4-Lane Major Arterial	34,000	12,103	No
between Calle Real & US 101 NB Ramps	4-Lane Major Arterial	34,000	25,797	No
between US 101 & Hollister Ave	4-Lane Major Arterial	34,000	24,419	No
between Hollister Ave & Matthews St	2-Lane Major Arterial	14,300	9,478	No
between Matthews St & James Fowler Rd	2-Lane Major Arterial	14,300	5,959	No
James Fowler Road				
between Hollister Ave & Terminal access (east)	2-Lane Minor Arterial	12,500	4,964	No
William Moffett Place				
between Terminal access (south) & SR 217	2-Lane Minor Arterial	12,500	5,047	No
Kellogg Avenue				
south of Hollister Ave	2-Lane Minor Arterial	12,500	4,994	No

Source: Kimley-Horn Associates 2016. (See Recirculated Draft Program EIR, Appendix C, Table 3-2).

[1] Street classifications are based on the Transportation Element of the *Goleta General Plan/Coastal Land Use Plan* (2006; updated 2009).

[2] Average daily traffic (ADT) volumes for the roadway segments were measured in April 2015 by Quality Counts, LLC.



Source: Kimley-Horn Associates 2016.

Santa Barbara Airport

Exhibit 4M

EXISTING TRANSIT NETWORK IN VICINITY OF AIRPORT

Route 6 – Goleta: Route 6 provides service between the transit center in downtown Santa Barbara and Goleta. The service travels along Hollister Avenue within the study area. This route provides daily service between 6 AM and 7 PM with headways of 30 minutes (20 minutes during peak periods).

Route 12X – Goleta Express: Route 12X provides express bus service between the transit center in downtown Santa Barbara and Goleta. The service travels along Hollister Avenue within the study area. This route provides weekday service between 6 AM to 7 PM and weekend service between 8 AM and 5:40 PM. Weekday headways are one hour and 30 minutes during peak periods. Saturday headways are one hour and 30 minutes during the midday while Sunday service operates hourly.

There are also several regional express bus services that provide commuter-oriented service between the Santa Barbara area and surrounding communities in north Santa Barbara County and Ventura County. The most heavily utilized are the Clean Air Express and the VISTA Coastal Express. The Clean Air Express operates commuter bus service from Santa Maria and Lompoc to Goleta and Santa Barbara. The VISTA Coastal Express operates between Oxnard, Ventura, Carpinteria, and the Santa Barbara area.

Other regional transit options include Santa Barbara Airbus; Central Coast Shuttle; Easy Lift Transportation, a para-transit service; and SMOOTH (Santa Maria Organization of Transportation Helpers) (SBCAG 2014). The Santa Barbara Airbus and Central Coast Shuttle provide shuttle service from the Santa Barbara Airport to Los Angeles International Airport (LAX).

Intra-city rail service is provided by the Amtrak Pacific Surfliner to the Goleta Amtrak station. The Amtrak station is located just south of US 101 at South La Patera Lane. Ten daily trains (five northbound and five southbound) serve Goleta and points south, including Los Angeles and San Diego. Four trains (two northbound and two southbound) serve points north, including Grover Beach and San Luis Obispo. Taxicabs provide connections between Goleta Amtrak Station and the Terminal.

Regulatory Setting

Caltrans is responsible for regulating transportation within the State and oversees all State-funded highway improvement projects. In this role, Caltrans allocates the various funding revenues for transportation projects according to Statewide and regional priorities. Caltrans is responsible for the planning, designing, building, operating, and maintaining of the State Highway System. It also has a division for aeronautics.

In 2013, S.B. 743 was signed into State law requiring that the Governor's Office of Planning and Research (OPR) develop a new approach to analyzing traffic impacts as part of the CEQA process. The revised approach is anticipated to eliminate the use of auto delay, LOS, and other vehicle capacity measurements in favor of using vehicle miles traveled (VMT) as a replacement measure. In response to S.B. 743, the OPR has released drafts of preliminary discussions regarding changes

to the transportation aspect of CEQA. New analysis requirements have not yet been finalized, as of June 2016.

At the regional or county level, SBCAG is responsible for addressing regional and multi-jurisdictional impacts to the State highway system and for long range, region-wide, transportation planning. With the passage of S.B. 375, SBCAG is required to incorporate into its Regional Transportation Plan (RTP), a Sustainable Communities Strategy to identify areas within the region that are sufficient to house the entire forecasted population of the region and to meet regional housing needs for the eight-year period from 2014 to 2022. If feasible, the forecasted development pattern for the region, when integrated with the transportation network and policies, must reduce greenhouse gas emissions from passenger vehicles to achieve State-approved targets as well as the region's own goals. Thus, the RTP has now integrated an analysis of population growth, land use, and housing need into the long-range transportation planning process.

Local transportation planning and permitting is under the jurisdiction of the Public Works Departments of the cities of Santa Barbara and Goleta and the County of Santa Barbara.

4.8.2 Applicable Plans and Policies

Regional

SBCAG has prepared two separate planning documents to address overall transportation issues within Santa Barbara County: the *2009 Santa Barbara County Congestion Management Program* (CMP) (SBCAG 2009) and the *2040 Regional Transportation Plan and Sustainable Communities Strategy* (RTP-SCS) (SBCAG 2013). In addition, SBCAG has prepared a draft Regional Bicycle Plan (2008), a Transit Needs Assessment (2013), and a Park and Ride Study (2014).

The CMP is a comprehensive program designed to reduce auto-related congestion through capital improvements, travel demand management (TDM), and coordinated land use planning among all jurisdictions. It was last updated in June 2009. Since State law requires the CMP to be consistent with the programs and projects contained in the County's RTP (California Government Code §65089.2[a]), a new update of the CMP will be forthcoming to address the recently adopted 2040 RTP-SCS. CMP network facilities located within the Airport study area include US 101, SR 217, South Fairview Avenue, Hollister Avenue, Calle Real, South Los Carneros Road, and Storke Road (Map 2.6, Goleta Valley CMP Network).

Santa Barbara County's CMP requires local agencies to maintain their regionally significant transportation facilities at LOS D, and if they cannot, to develop a deficiency plan that includes actions to improve circulation and air quality. Local agencies may choose to mitigate through capital improvement or approved system-wide strategies. Agencies that do not meet SBCAG's CMP standards risk losing certain portions of new gas tax revenues (SBCAG 2013).

The 2040 RTP-SCS plans how Santa Barbara County should meet its transportation needs for the 30-year period from 2010 to 2040 and considers existing and projected future land use patterns

as well as forecast population and job growth. However, local land use jurisdictions are not required to incorporate its strategies into their individual General Plans; implementation of the RTP-SCS is dependent on local government policy decisions and voluntary local government action. The RTP-SCS is also dependent on the availability of adequate funding.

The RTP-SCS incorporates already adopted plans and planning studies, including, but not limited to: *Plan Santa Barbara*; *Goleta General Plan/Coastal Land Use Plan; Isla Vista Master Plan*; and the UCSB *2025 Long-Range Development Plan*. Local plan updates currently in process, such as the County's *Eastern Goleta Valley Community Plan*, were also considered.

Local

According to the City of Santa Barbara Final General Plan EIR, the central transportation issue facing the City is how to accommodate incremental growth while minimizing or avoiding substantial increases in congestion at freeway interchanges and major City roads. A transportation model specifically tailored for the City showed that future development generates the least amount of increased traffic if located within the downtown core and along major transit corridors north of US 101. This is due to the compact mix of land uses, a street design that supports all types of users, and the accessibility of the downtown commercial district within this area and from other areas via transit.

The traffic model also demonstrated that eliminating growth in the City altogether would not eliminate increases in traffic congestion as the trend of less people living and working in the City continues. The analysis showed that if people continue to relocate outside the City and drive to work via US 101, traffic at the freeway interchanges will increase. The most effective measure to combat traffic congestion is to aggressively support TDM strategies. The primary reason why TDM was found to be more effective than land use growth restrictions is because TDM strategies were shown to affect a percentage of all existing and future trips, rather than just eliminating the incremental amount of trips caused by future development projects (City of Santa Barbara 2011).

Since traffic related to the Airport uses a local circulation system located within the boundaries of the City of Goleta, transportation policies of the City of Goleta are the most germane to this policy discussion. The City of Goleta's Transportation Element (Chapter 7.0 of its General Plan/Coastal Land Use Plan) contains the following policies and objectives:

> Policy TE 1: Integrated Multi-Modal Transportation System: To create and maintain a balanced and integrated transportation system to support the mobility needs of Goleta's residents and workforce, with choice of bus transit, bicycle, and pedestrian as well as private automobile modes. To reduce the percentage of peak-hour person-trips that are made by automobile and provide the facilities that will enable diversion of trips from automobiles to other modes. To develop, maintain, and operate a balanced, safe, and efficient multimodal transportation system to serve all persons, special-needs populations, and activities in the community.

Policy TE 2: Transportation Demand Management: To attempt to influence individual travel behavior, particularly by workers at larger scale employers, to lower future increases in peak-hour commute trips and other trips by persons in single-occupant vehicles.

Policy TE 3: Streets and Highways Plan and Standards: To provide a street network, including appropriate provisions for bicycles and pedestrians, that is adequate to support the mobility needs of city residents and businesses.

Policy TE 4: Target Level of Service Standards: To maintain an adequate LOS on the city street system, including at intersections, to provide for the mobility needs of the community. To avoid further degradation of service levels at intersections where existing service levels do not meet target standards.

Policy TE 5: Planned Street and Road Improvements: To identify and describe the major future improvements to the street and highway system that will be needed to accommodate the forecasted future traffic volumes, based upon the Land Use Plan, at acceptable levels of service.

Policy TE 6: Street Design and Streetscape Character: To ensure that the standards used for the design and development of new roadways and improvements to existing roadways reflect and support the character of adjacent development. To create streetscapes that will enhance neighborhood quality.

Policy TE 7: Public Transit (Bus Transportation): To support the efforts by MTD and other transit providers to sustain and expand the bus transit system to serve the needs of local and regional commuters, the transit-dependent population, and other users in a convenient, reliable, and efficient manner. To increase bus ridership levels in order to reduce peak-period automobile trips on area roadways.

Policy TE 8: Rail Transportation: To accommodate commuter-oriented rail passenger service along the UPRR (Union Pacific Railroad) corridor that would serve employment centers in Goleta and UCSB, in the event that the region determines to pursue this option to accommodate long-distance work trips between Ventura County and Goleta.

Policy TE 9: Parking: To ensure that an adequate amount of parking is provided to accommodate the needs of existing, new, and expanded development, with convenient accessibility and attention to good design. To assure that on- and off-street parking is responsive to the varying and unique needs of individual commercial areas and residential neighborhoods.

Policy TE 10: Pedestrian Circulation: To encourage increased walking for recreational and other purposes by developing an interconnected, safe, convenient, and visually attractive pedestrian circulation system.

Policy TE 11: Bikeways Plan: To encourage increased bicycle use for commuting and recreational purposes by developing an interconnected circulation system for bicycles that is safe, convenient, and within a visually attractive environment.

Policy TE 12: Transportation Systems Management: To establish operational controls that will manage the street network in a manner that will efficiently and safely utilize the existing limited capacity consistent with protection of the surrounding neighborhood.

Policy TE 13: Mitigating Traffic Impacts of Development: To ensure that new development is supported by adequate capacities in transportation systems, including city streets and roads, without reducing the quality of services to existing residents, commuters, and other users of the city street system.

Policy TE 14: Financing Transportation Improvements: To ensure that there is adequate funding for construction of transportation facilities that are needed to support new development and address existing deficiencies to achieve the targeted level of service.

Policy TE 15: Regional Transportation: Participate in developing regional transportation solutions to expand choices for local citizens, make the highway system more efficient, improve regional bus service, consider potential commuter rail service, and create an interconnected system of bicycle routes and trails.

Sections 30252 and 30254 of the Coastal Act are also adopted as part of the Goleta Transportation Element for those areas of the City that fall within the Coastal Zone. Policies TE 1, 3, 5, 7, and 9 contain strategies to implement these sections of the *California Coastal Act*, which relate to maintaining public access to the coast and ensuring that public services to coastal-dependent land uses are not precluded by other development.

4.8.3 Impact Evaluation Methodology and Significance Criteria

As part of the Program EIR, a Traffic Impact Study was prepared to determine and evaluate the potential traffic impacts associated with the Airport redevelopment presented in the proposed Master Plan. Detailed analysis and associated backup information are included in the resultant technical report, which is included in ~~this~~ the Recirculated Draft Program EIR as Appendix C.

Impact Evaluation Methodology

The study area for an evaluation of traffic impacts was defined based on likely access patterns for the Airport. Based on this definition, the intersections and roadway segments listed in Section 4.8.1 were identified for evaluation. The analysis process included determining the AM and PM peak-hour operations at the study intersections as well as daily operations along the roadway segments for the existing condition (2015) as well as for future year scenarios (Year 2022 and 2032) with and without the proposed project. Adopted significance thresholds were then used to determine if the project might have significant traffic impacts.

Existing Airport ADT and peak-hour trip generation are based on traffic counts collected in April 2015. The Airport's trip generation includes traffic to/from the Terminal, the onsite rental car center, and adjacent short-term and long-term parking lots. To account for a projected increase in airline activity, trip generation rates were increased based on the projected enplanement information provided in the Master Plan forecasts. The resulting trip generation for the 2022 and 2032 traffic conditions is shown in **Table 4N** and is part of the baseline future traffic conditions for the area.

TABLE 4N
Airport Trip Generation
Santa Barbara Airport (2015 – 2032)

Year	Enplanements[1]	ADT	AM Total	AM in	AM out	PM Total	PM in	PM out
Existing Conditions:								
2015[2]	300,000	5,421	386	192	194	291	145	146
Intermediate:								
2022	503,400	9,096	648	322	326	488	243	245
+/- [3]		**3,675**	**262**	**130**	**132**	**197**	**98**	**99**
Long Term:								
2032	657,000	11,872	845	420	425	637	317	320
+/- [3]		**6,451**	**459**	**228**	**231**	**346**	**172**	**174**

Source: Kimley-Horn Associates 2016.

[1] Future enplanement forecasts taken from Master Plan (Exhibit 2M)
[2] 2015 enplanements based on 2014 volumes and 2015 enplanement trends provided by Santa Barbara Airport; 2015 trip generation based on counts conducted in April 2015.
[3] Change in traffic from baseline condition (2015).

Trip generation for the FBO located south of the Terminal (Atlantic Aviation) is also based on traffic counts collected in April 2015 that were increased by the forecast general aviation operations growth provided in the Master Plan to identify baseline future traffic conditions for the study area. The resulting trip generation for relocated general aviation operations (i.e., Atlantic Aviation) for the intermediate- and long-term traffic conditions is shown in **Table 4P**.

The distribution of the trips represented in **Tables 4N** and **4P** are based on proposed access locations, freeway access, and the roadway network within the study area. The revised Traffic Impact Study shows the projected trip distribution and trip assignments that were used in the traffic impact analysis **(**Recirculated Draft Program EIR, Appendix C, Figures 4-1 through 4-6).

Airport-related traffic on the north side of the Airport (including an additional FBO) is part of the existing traffic counts on Hollister Avenue and other streets in the study area. Future Master Plan implementation years 2022 and 2032 peak-hour volumes at the study intersections and ADT volumes on the study roadway segments were estimated based on the 2035 City of Goleta PM peak-hour travel demand model provided by Kittelson & Associates on behalf of the City of Goleta. The 2035 traffic demand model output is included in an appendix to the revised Traffic Impact Study. ADT along the roadway segments was estimated by increasing 2035 PM peak-

hour volumes based on the percentage of existing daily traffic during the associated peak-hour. The resulting 2035 ADT volumes were then interpolated with the 2015 volumes to estimate 2022 and 2032 volumes.

TABLE 4P
Atlantic Aviation Peak-Hour Trip Generation
Santa Barbara Airport (2015 – 2032)

Year	General Aviation Operations[1]	ADT	AM Total[2]	AM in[2]	AM out[2]	PM Total[2]	PM in[2]	PM out[2]
Existing Conditions:								
2015	82,904[3]	676	51	29	22	49	25	24
Intermediate:								
2022	89,600	731	55	31	24	53	27	26
+/- [4]		**55**	**4**	**2**	**2**	**4**	**2**	**2**
Long Term:								
2032	99,900	815	61	35	26	59	30	29
+/- [4]		**139**	**10**	**6**	**4**	**10**	**5**	**5**

Source: Kimley-Horn Associates 2016.

[1] Future GA operations taken from forecasts presented in Master Plan (Exhibit 2M).
[2] 2015 trip generation based on counts conducted in April 2015.
[3] 2015 general aviation operations (Atlantic Aviation) were attained via linear interpolation between 2011 and 2017 data from the Master Plan.
[4] Change in peak-hour trips from baseline condition (2015).

To estimate 2022 and 2032 turning movement volumes at the study intersections, the projected change from the Goleta model's baseline peak-hour travel demand plots to the 2035 peak-hour travel demand plots were added to the existing (2015) counts to estimate intersection turning movement values. The projected change in traffic volumes between baseline and future year conditions were added to the inflows and outflows of existing traffic counts. Each respective intersection movement was then derived using an iterative approach that balanced the inflows and outflows for each approach. An Excel model was then used to compute the forecast turning volumes. Copies of the Excel calculation worksheets are included in an appendix to the revised Traffic Impact Study (Recirculated Draft Program EIR, Appendix C). Year 2022 baseline condition peak-hour volumes at the study intersections and ADT volumes on the study roadway segments were then determined by adding the reasonably expected cumulative project volumes. (Reasonably expected cumulative project volumes for the 2032 conditions are included within Goleta's travel demand model and, thus, were not double counted by this Program EIR study.)

To analyze the operations of the signalized intersections, the Traffix traffic analysis software package was used using *Highway Capacity Manual (HCM)* 2000 methodology; roundabouts proposed by the City of Goleta at South Fairview Avenue/SR 217 were measured and quantified using Sidra Intersection 6 analysis software with the Sidra capacity model and HCM 2010 traffic signal delay parameters. LOS for signalized intersections was calculated utilizing the Intersection Capacity Utilization (ICU) method. The ICU method establishes a system whereby highway facilities are rated based on how an intersection is functioning and how much extra capacity is

available to handle traffic fluctuations and incidents. Letters A to F are assigned to the intersection based on the cities of Goleta and Santa Barbara General Plan thresholds.[17]

Significance Thresholds

The City of Goleta has adopted the following threshold standards to determine the significance of project impacts to intersections and roadway segments. The City of Goleta traffic impact thresholds include the following criteria:

A) The project will result in a significant traffic impact when the addition of project traffic increases the V/C ratio at an intersection by the values provided below:

Intersection LOS (including project)	Increase in V/C or Trips Greater Than:
LOS A	0.20
LOS B	0.15
LOS C	0.10
LOS D	15 trips
LOS E	10 trips
LOS F	5 trips

B) The project's access to a major road or arterial road would require a driveway that would create an unsafe situation or a new traffic signal or major revisions to an existing traffic signal.

C) The project would add traffic to a roadway that has design features (e.g., narrow width, road side ditches, sharp curves, poor sight distance, and inadequate pavement structure) that would become a potential safety problem with the addition of project traffic. Exceedance of a roadway's designated Circulation Element Capacity (see **Table 4Q**) may indicate the potential for the occurrence of the above impacts.

D) Project traffic would utilize a substantial portion of an intersection's capacity where the intersection is currently operating at acceptable levels of service but with cumulative traffic would degrade to or approach LOS D (V/C 0.81) or lower. "Substantial" is defined as a minimum change of 0.03 for an intersection which would operate from 0.80 to 0.85, a change of 0.02 for an intersection which would operate from 0.86 to 0.90, and a change of 0.01 for an intersection which would operate greater than 0.90 (LOS E or worse).

For cumulative impacts, it is assumed that a proposed project would contribute substantially to a cumulative impact when the addition of project-related traffic increases V/C by the minimum threshold value (Item D above) when the intersection is within the listed V/C ranges.

[17] As previously mentioned, revised methodology per S.B. 743 is not yet available.

TABLE 4Q
Roadway Classifications and LOS Thresholds

Functional Street Classification	ADT Design Capacity	LOS C ADT Threshold[1]
Major Arterial		
2 Lanes	17, 900	14,300
4 Lanes	42,480	34,000
4+ Lanes	58,750	47,000
Minor Arterial		
2 Lanes	15,700	12,500
4 Lanes	37,680	30,100
Collector Streets		
2 Lanes	11,600	9,280
Local Streets		
2 Lanes	9,100	7,280

Source: City of Goleta 2006.

[1] For impacts on the study area roadway segments, the City of Goleta has established roadway classifications and LOS thresholds. The minimum standard is LOS C; segments operating at LOS D, E, or F are considered deficient.

The Santa Barbara City Council thresholds adopted as part of its 2013 *Traffic Management Strategy* were also considered as a secondary set of significance thresholds in the revised Traffic Impact Study (see Section 2.4 of Recirculated Draft Program EIR, Appendix C) although none of the study intersections are located within the City of Santa Barbara's jurisdiction. The City of Santa Barbara considers any trips through an intersection operating at a V/C of 0.77 or greater to be contributing to a significant cumulative impact.

4.8.4 Project-Specific Impacts

Based on the Master Plan development concept, the relocation of FBO facilities located south of the Terminal and the construction and consolidation of Terminal parking lots were identified as having the potential to impact traffic distribution within the study area in the intermediate- (2022) and long-term (2032) Master Plan implementation scenarios. These potential impacts are discussed in Section 4.8.5 as part of the cumulative impact discussion.

Impact T-1: In the first five years of implementation, the Master Plan recommends improvements to the Airport's airside facilities, land acquisition for runway protection zones, and other maintenance and safety improvements that would not affect external traffic volumes. Therefore, traffic in the short term (2017) would not be affected by the proposed project.

No changes or impacts would occur to the availability of public transit, bicycle lanes, or the implementation of City of Goleta TMD policies. In addition, implementation of the Master Plan will not cause CMP intersections to operate

below a LOS D and is consistent with the City of Santa Barbara General Plan, which has been incorporated into the RTP-SCS.

Result T-1: **Project-specific traffic and circulation policy impacts of implementation of the proposed Master Plan in the short term are Class III, Less than Significant Impact.**

4.8.5 Regional (Cumulative) Impacts

Cumulative projects for the traffic analysis in the intermediate and long term were based on ~~a~~ cumulative project lists provided by the cities of Goleta and Santa Barbara (March 2016). These projects are included in Goleta's 2035 traffic demand model of future cumulative conditions. Projected growth in airport traffic due to future enplanements is also included in the future cumulative scenarios provided by Goleta's traffic demand model. To determine the appropriate cumulative traffic scenarios for the Master Plan implementation years of 2022 and 2032, specific Master Plan projects, other cumulative projects, and overall Airport growth have been incorporated into the intermediate- or long-term analyses, as appropriate, based on the anticipated year of completion. **Table 4R** shows the ADT and peak-hour trips associated with each cumulative project and the Master Plan scenario in which they were evaluated.

Intermediate-Term (2022) Impacts

As a result of implementation of the proposed Master Plan, by 2022, trips associated with Atlantic Aviation, which is currently located south of the Terminal, would be redistributed from the south part of the Airport to the north part of the Airport. Overall Airport growth is not dependent upon implementation of the proposed Master Plan and is evaluated as a project-related cumulative impact only to the extent that such traffic might be redistributed onto the street system in a different manner than the Goleta traffic demand model assumed due to implementation of the Master Plan.

Future baseline conditions for 2022 without the proposed project have been established to provide a method of determining the project-related cumulative impacts. There are 14 other development projects proposed within the study area that have been included in the 2022 baseline scenario for the intermediate term (see **Table 4R**). These projects, along with overall Airport projected growth, have been used to determine the 2022 future baseline conditions.

TABLE 4R
Cumulative Project Trip Generation
Santa Barbara Airport Environs (2022 & 2032)

Land Use	ADT	AM Peak-Hour			PM Peak-Hour		
		Total	In	Out	Total	In	Out
Intermediate Term (2022):							
Goleta Valley Cottage Hospital (GVCH) (10.8 tsf)	**350**	**22**	18	4	**34**	9	25
Village at Los Carneros (465 du)	**2,999**	**230**	46	184	**280**	182	98
Harvest Hill Ranch (6 du)	**56**	**4**	1	3	**6**	4	2
Investec (111.1 tsf self-storage)	**396**	**33**	26	7	**36**	9	27
Pacific Beverages (warehousing) (97.0 tsf)	**345**	**29**	23	6	**31**	8	23
Direct Relief International (office/warehousing) (158.2 tsf)	**789**	**89**	76	13	**90**	17	73
Airport Industrial Project (light industrial/retail) (50 tsf)	**1,469**	**205**	117	88	**104**	35	69
Chrysler Auto Dealership (49.3 tsf)	**1,593**	**95**	70	25	**129**	50	79
Fairview Commercial Center (retail/office) (17.0 tsf) (residential) (2 du)	**428**	**64**	34	30	**31**	12	19
Islamic Society of Santa Barbara (6.2 tsf)	**50**	**3**	2	1	**3**	1	2
Schwann Self Storage (111.7 tsf self-storage)	**398**	**34**	26	8	**36**	9	27
Marriott Residence Inn (118 rooms)	**925**	**63**	39	24	**67**	35	32
Somera Medical Office (20.0 tsf)	**650**	**41**	33	8	**62**	17	45
Old Town Village (residential) (175 du)	**987**	**75**	13	62	**88**	59	29
Intermediate Term Total:	***11,435***	***987***	*524*	*463*	***997***	*447*	*550*
Long Term (2032):							
Old Town Industrial Center (light industrial) (191.9 tsf)	**1,330**	**176**	155	21	**185**	22	163
Heritage Springs (apartments) (360 du)	**1,917**	**130**	29	101	**158**	101	57
Long Term Total:	***3,247***	***306***	*184*	*122*	***343***	*123*	*220*

Source: Kimley-Horn Associates 2016. (See Recirculated Draft Program EIR, Appendix C, Tables 5-1 and 6-1).

ADT = average daily traffic
tsf = thousand square feet
du = dwelling unit

In addition, by 2022, the distribution of traffic in proximity to the Airport may be affected by the completion of the following roadway construction projects:

- Ekwill Street extension
- SR 217/Hollister Avenue intersection improvements (roundabouts)

The Ekwill Road Extension project would construct an Ekwill Street extension across Old Town Goleta from Kellogg Avenue to South Fairview Avenue. The project would improve east-west circulation and relieve congestion within the Old Town Goleta area. An extension from Fowler Road was also planned, but is no longer likely due to need to locate the proposed road extension within the Airport's RPZ.

The SR 217 and Hollister Avenue Intersection Improvements would convert the SR 217 and Hollister Avenue intersections to roundabouts. The multilane roundabouts are currently in the design phase.

The resultant traffic volumes for the future baseline traffic conditions and the future conditions with implementation of the Master Plan for the intermediate term (2022) are shown in Recirculated Draft Program EIR, Appendix C, Figures 5-1 and 5-2 respectively.

Impact T-2: The intersection LOS for the 2022 cumulative planning horizon, with and without the proposed Master Plan, is shown in **Table 4S**. Based on the analysis and cumulative trip generation and distribution provided in the traffic study, most of the intersections within the study area would operate at LOS C or better during all peak periods under the intermediate-term (2022) scenario. However, one intersection, listed below, would experience LOS below LOS C during the PM peak hour:

- Kellogg Avenue & Hollister Avenue: **LOS D** (PM peak-hour with or without project)

Implementation of the Master Plan is anticipated to contribute 14 PM peak-hour trips through the intersection in 2022.

All roadway segments analyzed would operate at LOS C or better.

No changes or impacts would occur to the availability of public transit, bicycle lanes, or the implementation of City of Goleta TMD. In addition, implementation of the Master Plan will not cause CMP intersections to operate below a LOS D and is consistent with the City of Santa Barbara General Plan, which has been incorporated into the RTP-SCS.

Result T-2: **Proposed Master Plan projects, specifically the relocation of Aviation Atlantic FBO from south of the commercial passenger terminal to the north side of the Airport, would contribute to cumulative impacts at the intersection of Kellogg Avenue and Hollister Avenue during the PM peak-hour conditions in the intermediate term (2022).** ~~**The intersection of Kellogg Avenue and Hollister Avenue would experience a significant cumulative impact during the PM peak-hour conditions in the intermediate term (2022) due to proposed Master Plan projects, specifically the relocation of Aviation Atlantic FBO from south of the commercial passenger terminal to the north side of the Airport.**~~ **The project is anticipated to contribute 14 PM peak-hour trips through the intersection in 2022. This does not meet the City of Goleta's cumulative thresholds of significance.**

Based on the City of Santa Barbara's significance thresholds, however, proposed projects' contribution to cumulative impacts to the Kellogg Avenue

and Hollister Avenue intersection are Class I, Significant Environmental Impact at this time (i.e., the City of Santa Barbara considers any trips through an intersection that would experience a V/C ratio of 0.77 or greater as ~~a significant~~contributing to a cumulative impact). Although the revised Traffic Impact Study includes mitigation that would improve the intersection LOS from LOS D to LOS B in the PM peak-hour, the street improvement is not within the control of the Airport or the City of Santa Barbara. If the recommended street improvements are undertaken, the Airport will contribute its fair-share cost allocation of the proposed improvements (based on City of Goleta traffic impact mitigation fees). If this occurs, this impact would be fully mitigated.

TABLE 4S
Intermediate-Term (2022) Peak-Hour Intersection Levels of Service
Santa Barbara Airport Environs

Intersection		Peak Hour	Baseline		Baseline with Project		Significant Cumulative Impact?		
			V/C	LOS	V/C	LOS	Change in V/C	Santa Barbara	Goleta
1	S. Los Carneros Rd & US 101 NB Ramp	AM	0.621	B	0.621	B	0.000	No	No
		PM	0.603	B	0.603	B	0.000	No	No
2	S. Los Carneros Rd & US 101 SB Ramp	AM	0.595	A	0.595	A	0.000	No	No
		PM	0.592	A	0.592	A	0.000	No	No
3	S. Los Carneros Rd & Calle Koral	AM	0.637	B	0.637	B	0.000	No	No
		PM	0.665	B	0.665	B	0.000	No	No
4	S. Los Carneros Rd & Hollister Ave	AM	0.503	A	0.503	A	0.000	No	No
		PM	0.645	B	0.645	B	0.000	No	No
5	Hollister Ave & Los Carneros Way	AM	0.330	A	0.331	A	0.001	No	No
		PM	0.464	A	0.464	A	0.000	No	No
6	S. Fairview Ave & Calle Real	AM	0.555	A	0.555	A	0.000	No	No
		PM	0.760	C	0.760	C	0.000	No	No
7	US 101 NB Ramps & S. Fairview Ave	AM	0.703	C	0.710	C	0.007	No	No
		PM	0.733	C	0.740	C	0.007	No	No
8	S. Fairview Ave & US 101 SB Ramps	AM	0.533	A	0.536	A	0.003	No	No
		PM	0.608	B	0.612	B	0.004	No	No
9	S. Fairview Ave & Hollister Ave	AM	0.590	A	0.599	A	0.009	No	No
		PM	0.728	C	0.733	C	0.005	No	No
10	Hollister Ave & SR 217 WB[1]	AM	0.489	A	0.493	A	0.004	No	No
		PM	0.641	B	0.643	B	0.002	No	No
11	Hollister Ave & SR 217 EB[1]	AM	0.378	A	0.380	A	0.002	No	No
		PM	0.596	A	0.599	A	0.003	No	No
12	**Kellogg Ave & Hollister Ave**	AM	0.561	A	0.562	A	0.001	No	No
		PM	**0.800**	**D**	**0.801**	**D**	**0.001**	**Cumulative[2]**	No[3]

Source: Kimley-Horn Associates2016. (See Recirculated Draft Program EIR, Appendix C, Table 5-2).

V/C = volume/capacity ratio; LOS = level of service; **Bold** values indicate intersections forecast to operate at unacceptable level of service (LOS D, E, or F) (Goleta threshold) or 0.77 or greater V/C ratio (Santa Barbara threshold).

[1] Analyzed as a roundabout. Results are measured in V/C using the Sidra capacity model and HCM 2010 traffic signal delay parameters using Sidra 6 software.
[2] Project would add trips to this intersection, which is forecast to operate above 0.77 (V/C ratio).
[3] Project would add 14 trips, which is below the Goleta significance threshold (15 trips) for LOS D intersections.

Long-Term (2032) Impacts

Impact T-3: Although several road network changes are planned for the study area, for example, South Fairview Avenue and Calle Real intersection improvements, South Fairview Avenue and US 101 SB ramp improvements, a La Patera Freeway overcrossing, and a Hollister Avenue redesign, these specific improvements and project completion years are currently unknown. They have, therefore, not been incorporated into the following analysis.

The intersection LOS for the 2032 cumulative planning horizon, with and without the proposed Master Plan, is shown in **Table 4T**. Based on the analysis and cumulative trip generation and distribution provided in the traffic study, most of the intersections within the study area would operate at LOS C or better during all peak periods under the long-term (2032) scenario. However, two intersections, listed below, would experience LOS below LOS C during the PM peak hour (with or without the project):

- South Fairview Avenue & US 101 NB ramps: **LOS D**; and
- Kellogg Avenue & Hollister Avenue: **LOS D**.

Implementation of the proposed Master Plan is anticipated to contribute 12 PM peak-hour trips through the South Fairview Avenue/US 101 NB ramps and 15 PM peak-hour trips through the intersection of Kellogg Avenue and Hollister Avenue in 2032. The South Fairview Avenue/US 101 NB ramp is part of the SBCAG's CMP network.

All roadway segments analyzed would also operate at LOS C or better (with or without the project) with the exception of the following:

- South Fairview Avenue between US 101 & Hollister Avenue;
- South Fairview Avenue between Hollister Avenue and Matthews Street; and
- Kellogg Avenue south of Hollister Avenue.

All of these roadway segments would have ADT exceeding LOS C with or without implementation of the Master Plan. Only the South Fairview Avenue segment between US 101 and Hollister Avenue would have higher volumes due to the proposed project (i.e., as a result of the redistribution of FBO traffic from the south side of the Airport to the north side). An estimated 326 additional project-related ADT would occur on South Fairview Avenue between US 101 and Hollister Avenue. The other two roadway segments (South Fairview between Hollister Avenue and Matthews Street and Kellogg Avenue south of Hollister Avenue) are expected to have a lower ADT than would otherwise occur as a result of Master Plan implementation.

TABLE 4T
Long-Term (2032) Peak-Hour Intersection Levels of Service
Santa Barbara Airport Environs

Intersection		Peak Hour	Baseline		Baseline with Project		Significant Cumulative Impact?		
			V/C	LOS	V/C	LOS	Change in V/C	Santa Barbara	Goleta
1	S. Los Carneros Rd & US 101 NB Ramp	AM PM	0.625 0.583	B A	0.625 0.583	B A	0.000 0.000	No No	No No
2	S. Los Carneros Rd & US 101 SB Ramp	AM PM	0.628 0.594	B A	0.628 0.594	B A	0.000 0.000	No No	No No
3	S. Los Carneros Rd & Calle Koral	AM PM	0.701 0.661	C B	0.701 0.661	C B	0.000 0.000	No No	No No
4	S. Los Carneros Rd & Hollister Ave	AM PM	0.536 0.658	A B	0.537 0.658	A B	0.001 0.000	No No	No No
5	Hollister Ave & Los Carneros Way	AM PM	0.355 0.470	A A	0.356 0.471	A A	0.001 0.001	No No	No No
6	S. Fairview Ave & Calle Real	AM PM	0.549 0.761	A C	0.549 0.761	A C	0.000 0.000	No No	No No
7	**US 101 NB Ramps & S. Fairview Ave**	AM **PM**	0.645 **0.855**	B **D**	0.654 **0.855**	B **D**	0.009 **0.000**	No **Cumulative[2]**	No No[3]
8	S. Fairview Ave & US 101 SB Ramps	AM PM	0.521 0.579	A A	0.525 0.584	A A	0.004 0.005	No No	No No
9	S. Fairview Ave & Hollister Ave	AM PM	0.552 0.692	A B	0.561 0.699	A B	0.009 0.007	No No	No No
10	Hollister Ave & SR 217 WB[1]	AM PM	0.523 0.665	A B	0.527 0.667	A B	0.004 0.002	No No	No No
11	Hollister Ave & SR 217 EB[1]	AM PM	0.418 0.620	A B	0.420 0.621	A B	0.002 0.001	No No	No No
12	**Kellogg Ave & Hollister Ave**	AM **PM**	0.576 **0.835**	A **D**	0.578 **0.837**	A **D**	0.002 **0.002**	No **Cumulative[4]**	No **Yes[5]**

Source: Kimley-Horn Associates 2016. (See Recirculated Draft Program EIR, Appendix C, Table 6-2).

NOTES: V/C = volume/capacity ratio; LOS = level of service; **Bold** values indicate intersections operating at unacceptable level of service (LOS D, E, or F) (Goleta threshold) or 0.77 or greater V/C ratio (Santa Barbara threshold).

[1] Analyzed as a roundabout. Results are measured in V/C using the Sidra capacity model and HCM 2010 traffic signal delay parameters using Sidra 6 software.
[2] Project would add trips to this intersection, which is forecast to operate above 0.77 (V/C ratio).
[3] Project would add 12 trips, which is below the Goleta significance threshold (15 trips) for LOS D intersections.
[4] Project would add trips to this intersection, which is forecast to operate above 0.77 (V/C ratio).
[5] Project would add 15 trips, which meets the Goleta significance threshold (15 trips) for LOS D intersections.

The City of Goleta has not adopted significance thresholds for roadway segments unless the project would add traffic to a roadway that has design features (e.g., narrow width, road side ditches, sharp curves, poor sight distance, and inadequate pavement structure) that would become a potential safety problem with the addition of project traffic (refer to Section 4.8.3). Based on a field visit conducted in March 2014, these features are not present

on the affected segment of South Fairview Avenue and, therefore, no significant impact would occur.

No changes or impacts would occur to the availability of public transit, bicycle lanes, or the implementation of City of Goleta TMD policies. In addition, implementation of the Master Plan will not cause CMP intersections to operate below a LOS D and is consistent with the City of Santa Barbara General Plan, which has been incorporated into the RTP-SCS.

Result T-3: **By full implementation of the proposed Master Plan (2032), two intersections would operate at LOS D during the PM peak-hour. None of these intersections would have project-specific impacts due to the proposed Master Plan; however, proposed Master Plan projects would contribute to cumulative impacts at one of the intersections (South Fairview Avenue/ US 101 NB ramp) ~~would experience cumulative impacts due to the project~~ based on the City of Santa Barbara thresholds. Proposed Master Plan projects would contribute to cumulative impacts at the~~The~~ other intersection (Kellogg Avenue/ Hollister Avenue) ~~would have significant cumulative intersection~~ based on either city's significant thresholds. (The City of Goleta's significance threshold for cumulative impact is 15 or more additional trips at intersections experiencing LOS D; the City of Santa Barbara considers any trips through an intersection operating at a V/C ratio of 0.77 or greater to be ~~a~~ contributing to a cumulative impact.)**

An estimated 12 project-related trips are expected to go through the South Fairview Avenue/US 101 NB ramp in the PM peak-hour; and 15 project-related trips are expected to go through the Kellogg Avenue/Hollister Avenue intersection. The South Fairview Avenue/US 101 NB ramp is part of the SBCAG's CMP network and would remain operating at a LOS D, consistent with the CMP.

The use of traffic improvements and/or TDM measures in the future development of the new FBO lease areas are discussed in Section 4.8.7 to help reduce project-related cumulative impacts to these affected intersections. In addition, the Airport would contribute traffic mitigation fees toward the future construction of planned Goleta General Plan traffic improvement projects; however, the project's contribution to cumulative traffic impacts ~~of implementation of the proposed Master Plan~~ in the long term remain Class I, Significant Environmental Impact at this time.[18]

[18] Once S.B.743 is implemented, it is possible that project-related cumulative impacts associated with the Atlantic Aviation relocation would no longer be considered significant under CEQA. The VMT that are associated with this FBO in its new location would be less than its old location since the new location is closer to major arterials (i.e., South Fairview Avenue and Hollister Avenue) as well as US 101.

4.8.6 Comparative Impacts of Alternatives

No Project Alternative

Under the No Project alternative, existing land uses at the Airport would continue to generate vehicular trips at their present rates. As discussed in Section 4.8.4 in the analysis of project-specific impacts, the proposed Master Plan itself would not create significant additional trips since the proposed project is primarily the redistribution of existing land uses within the Airport and safety projects. Temporary trip generation from construction and/or demolition would be less since the only projects to occur under this alternative would be general maintenance projects. However, significant cumulative impacts are forecast to occur in the project study area with or without the proposed project.

Environmentally Superior Alternative

The Environmentally Superior alternative would generate operational traffic at a similar rate as the project as proposed since the only projects that would not occur under this alternative are ones that would not generate operational vehicular traffic. For example, the proposed Taxiway H Airfield Safety Project and related actions are infrastructure projects that do not produce vehicular trips.

Similar to the No Project alternative, vehicular trips due to construction activities under this alternative would be less than the project as proposed since the taxiway project would not be built.

4.8.7 Mitigation Measures

Recommended Intersection Improvements

Kellogg Avenue & Hollister Avenue (Intermediate-Term [2022] Cumulative Impact). To mitigate the PM peak-hour significant cumulative impact at the intersection of Kellogg Avenue and Hollister Avenue, the eastbound approach could be modified to remove the shared thru-right turn lane and add a thru-lane and right turn pocket. This proposed mitigation would improve the intersection from LOS D (V/C=0.801) to LOS B (V/C=0.632) during the PM peak-hour period.

This mitigation is consistent with the proposed improvement identified in the Goleta General Plan, and could be implemented through striping changes. However, this would eliminate the bike lane in the eastbound direction. Conversely, road widening would likely require land acquisition from the adjacent business. Improvements at this intersection should be consistent with the future Hollister Complete Streets Corridor Project between South Fairview Avenue and SR 217, which will focus on improved bike and pedestrian access while serving vehicle traffic and multi-modal connections.

Fairview Avenue & US 101 Northbound Ramps (Long-Term [2032] Cumulative Impact). To mitigate the PM peak-hour cumulative impact at the intersection of South Fairview Avenue/US 101 NB ramps, an additional westbound thru-lane could be added to improve the LOS from LOS D (VC=0.855) to LOS B (V/C=0.663). The mitigation would require coordination with Caltrans to ensure proper design of the intersection. The proposed mitigation is consistent with the proposed improvement identified in the Goleta General Plan.

Kellogg Avenue & Hollister Avenue (Long-Term [2032] Cumulative Impact). To mitigate the PM peak-hour cumulative impact at the intersection of Kellogg Avenue and Hollister Avenue, the eastbound approach could be modified to remove the shared thru-right turn lane and to add a thru-lane and a right turn pocket. This proposed mitigation would improve the intersection from LOS D (V/C=0.835) to LOS B (V/C=0.631) during the PM peak-hour period. This is the same improvement that is proposed for impacts in the intermediate term (see previous discussion).

Improved intersection LOS would be realized with any of the above improvements as shown below in **Table 4U**.

TABLE 4U
Long-Term (2032) Mitigated Conditions
Peak-Hour Intersection Levels of Service
Santa Barbara Airport Environs

Intersection		Peak Hour	Baseline before Improvement		Baseline with Project before Improvement		With Project after Improvement	
			V/C	LOS	V/C	LOS	V/C	LOS
7	**S. Fairview Ave & US 101 NB Ramps** - add additional WB thru-lane	AM **PM**	0.645 **0.855**	B **D**	0.654 **0.855**	B **D**	0.474 0.663	A B
12	**Kellogg Ave & Hollister Ave** - Remove EB shared thru-right lane and add EB thru-lane and EB right-turn lane	AM **PM**	0.576 **0.835**	A **D**	0.578 **0.837**	A **D**	0.461 0.631	A B

Source: Kimley-Horn Associates 2016. (See Recirculated Draft Program EIR, Appendix C, Table 6-4).

NOTES: V/C = volume/capacity ratio; LOS = level of service; **Bold** values indicate intersections operating at unacceptable level of service (LOS D, E, or F) (Goleta threshold) or 0.77 or greater V/C ratio (Santa Barbara threshold).

On-Airport Public Road

In addition to the intersection improvements discussed above, a public road along the east edge of the airport property was considered to provide access from Matthews Street along South Fairview Avenue to the FBOs and additional north side airport uses via East Verhelle Road. However, due to proximity of the Airport's north side access to a major arterial (Hollister Avenue) and freeway ramps (US 101 at South Fairview Avenue and SR 217 at Hollister Avenue), the proposed on-airport connection was not anticipated to significantly improve traffic operations. It is more likely

that the FBO users would continue to use the most direct route via freeways and Hollister Avenue.

La Patera Overcrossing

As part of the City of Goleta General Plan, a vehicular crossing is planned across US 101 at La Patera Road. The overcrossing would connect Calle Real north of US 101 to Hollister Avenue south of US 101 and is anticipated to relieve congestion and improve LOS on congested cross routes with freeway interchanges. The future improvement is intended to reduce traffic along roadway segments such as South Fairview Avenue and improve traffic conditions at the US 101 SB ramps.

Although listed in the Goleta General Plan, this improvement is currently programmed, but unfunded. The County of Santa Barbara's Regional Transportation Plan (2013) identifies the La Patera Overcrossing as a planned project to improve bike and pedestrian connectivity through Goleta with no mention of vehicle access. However, if the project does move forward, the Airport could contribute mitigation fees for its fair-share cost allocation of the proposed improvements (based on City of Goleta traffic impact mitigation fees) to help alleviate traffic in the study area.

Transportation Demand Measures and Vehicle Miles Traveled Metrics

Implementation of TDM strategies and availability of alternative transportation options may provide opportunities to reduce the number of vehicle trips travelling through the study area. The FBOs, other north side airport uses, and neighboring businesses north of Hollister Avenue are conveniently located next to several MTD bus stops, the Amtrak Goleta Station, and other transit services. By promoting flexible work hours to reduce peak-hour travel, incentivizing transit use for employees, and removing free or cheap parking options, the public would be more likely to use alternative transportation modes and reduce peak-hour congestion. As a mitigation measure, the Airport could fund or organize a local campaign in conjunction with MTD, City of Santa Barbara, and City of Goleta to promote TDM, ride sharing, flexible schedules, transit ridership, and other alternative transportation modes with the goal of reducing vehicle trips.

Similarly, as part of the Goleta General Plan, a new multi-modal transit center is proposed to be located adjacent to the Amtrak Goleta Station. The multi-modal transit center would provide a connection hub between rail, express bus, local bus, bicycle routes, and other transportation modes, allowing greater flexibility and connections for alternative transportation modes. Due to the proximity of the proposed multimodal transit center, as a mitigation measure, the Airport could contribute funds to the design and/or construction.

Mitigation Measures for Transportation/Traffic Cumulative Impacts T-2 and T-3

T/mm-1: **All development at the Airport will contribute an equitable share cost allocation for afternoon peak-hour trips added to the Hollister Avenue/Kellogg Avenue intersection and to the Fairview Avenue/US 101 NB ramps. Equitable share shall be calculated using the most recent cost for the improvement programmed for these intersections in the Goleta Transportation Improvement Plan (GTIP), and shall be based upon a traffic study prepared pursuant to the City of Santa Barbara Traffic Management Strategy for the Airport Area, including consultation and coordination with the City of Goleta.** ~~**The Airport will contribute its "fair share" cost allocation of traffic mitigation fees for the future construction of planned Goleta General Plan traffic improvement projects or a multi-modal transit center, based on adopted mitigation fee programs, at the time that such improvement projects go forward.**~~

T/mm-2: **The City will pursue the implementation of TDM measures within new north side lease agreements, consistent with City policy, as north side redevelopment opportunities become available.**

Since intersections potentially affected by implementation of the proposed Master Plan are expected to be above significance thresholds in years 2022 and 2032, cumulative traffic impacts of the proposed Master Plan remain a Class I, Significant Environmental Impact.

5.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines, Section 15126.2(c) requires that the use of non-renewable resources and the commitment of future generations to similar uses be discussed in a project's Environmental Impact Report (EIR); the use of such resources is an irreversible effect of the development process. In addition, certain environmental accidents may cause irreversible damage to the environment.

The proposed Master Plan recommends that certain development or redevelopment projects be carried forth at the Airport over the next 20 years to increase the Airport's safety and efficiency. Construction of new buildings and paved surfaces would entail the commitment of energy and non-renewable natural resources, such as fossil fuels, sand and gravel, asphalt, metals and other minerals, and water, which could then no longer be utilized for other purposes. This commitment and consumption of building materials and energy is associated with any development in the region and would not be unique to the proposed project. Before any ground-disturbing actions take place, they must be authorized in subsequent site-specific environmental analyses. Therefore, adoption of the Master Plan itself would not cause an irreversible or irretrievable commitment of resources.

Future activities occurring at the Airport due to recommended projects would result in the ongoing irreversible commitment of energy, water, and land. For example, additional vehicle travel would utilize energy sources, while solid waste generation would utilize limited landfill capacity.

5.2 EFFECTS FOUND NOT TO BE SIGNIFICANT

An Initial Study was completed on the Airport's proposed Master Plan in June 2014 with an agency and public review period ending on July 25, 2014. Based on this environmental scoping process, the following possible effects of the proposed project have been determined to not be significant:

- Adverse impacts on visual resources, including changes in topography and impacts related to light or glare;
- Long-term emissions, including greenhouse gases (GHGs) and odors, such that applicable air quality and GHG emission goals would not be met;
- Disturbance of known human remains or unique paleontological or geological resources;
- Soil erosion or impacts related to the use of septic systems;
- Hazards to the public due to the routine use, transport, or accidental upset of hazardous materials;
- Additional safety hazards related to the Airport Influence Area or adopted emergency response plans or evacuation plans;
- Risk of loss, injury, or death involving wildland fires;
- Excessive noise or groundborne vibration;
- Displacement of existing housing;
- Impacts to the availability of public services such as waste water disposal service or treatment, storm water drainage, water service or treatment, fire protection, police protection, schools, or other public facilities;
- Impacts to parks or other recreational facilities;
- Circulation-related impacts, such as impediments to emergency access and safe design of the transportation system;
- Impacts to the availability of public transit, bicycle, or pedestrian facilities;
- Change in air traffic patterns;
- Placement of housing within a flood hazard area or risk of loss, injury, or death due to inundation by seiche, tsunami, or mudflow;

- The physical division of an existing community.

The project's Initial Study was incorporated by reference into the Draft Program EIR and was included as Appendix A.

Following additional analysis completed as a part of the Draft Program EIR, additional possible effects of the proposed project have also been found to be less than significant, i.e., Class III. These additional environmental effects are:

- Construction of new Airport facilities within Special Flood Hazard Areas. All projects at the Airport would be subject to the provisions of the City's flood development permit process as defined in Chapter 22.24 of the City *Municipal Code*.

- The proposed Master Plan is consistent with the City's General Plan, Climate Action Plan, and Water Quality Management Plan. It is also consistent with regional plans such as the County Air Pollution Control District's (APCD) 2013 *Clean Air Plan* (CAP), the Regional Water Quality Control Board's (RWQCB) Basin Plan, and the Santa Barbara County Association of Government's (SBCAG) *Regional Transportation Plan and Sustainable Communities Strategy* (RTP-SCS). SBCAG's existing Airport Land Use Plan (ALUP) is currently being updated in the form of an Airport Land Use Compatibility Plan (ALUCP) per the California Department of Transportation's airport planning handbook; the proposed Master Plan, if approved, would be incorporated in the next ALUCP update, as necessary.

- Long-term solid waste disposal for specific projects recommended by the proposed Master Plan are expected to be well below the City's 196-tons per year (tpy) threshold for project-specific impacts.

- The proposed Master Plan would not generate solid waste above what has already been accounted for by the City through its General Plan and Final General Plan EIR. Thus, the proposed Master Plan's cumulative solid waste disposal impacts have already been evaluated and mitigated through existing and proposed policies and programs of the City's General Plan.

5.3 UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) requires that significant environmental effects that cannot be avoided be specifically identified. These "Class I" impacts are those that cannot be mitigated below a level of significance with the project as proposed and are thus "unavoidable" unless the project is redesigned to ameliorate the impact.

The Master Plan's long-term cumulative traffic impacts fall into this category. Due to the proposed relocation of certain general aviation uses to the north side of the Airport, up to 15 additional PM peak-hour trips would use the Kellogg Avenue/Hollister Avenue intersection. In the years 2022 and 2032, this intersection is expected to operate at level of service (LOS) D. The City

of Goleta has established a significance threshold of 15 trips for those intersections that operate at LOS D. In the long-term scenario (year 2032), the project's contribution to cumulative impacts would be over this threshold. This number of additional trips would also be above the City of Santa Barbara cumulative traffic significance threshold.

In addition, implementation of the proposed Master Plan would generate an additional 12 trips through the South Fairview Avenue/US 101 NB ramps during the PM peak-hour by the year 2032. While not over the City of Goleta cumulative traffic significance threshold, this impact is above the City of Santa Barbara cumulative traffic significance threshold.

The additional trips cannot be avoided unless the proposed relocation of general aviation use does not occur. However, the consolidation of all general aviation uses to the north side of the Airport is one of the primary aspects of the proposed plan and has significant future safety and efficiency ramifications for the Airport. However, it should be noted that before any ground-disturbing actions take place, they must be authorized in subsequent site-specific environmental analyses. Therefore, adoption of the Master Plan itself would not cause unavoidable adverse impacts.

5.4 GROWTH-INDUCING IMPACTS

Under CEQA Guidelines Section 15126.2(d), a discussion of growth inducement should include "the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment," "projects which would remove obstacles to population growth," or "the characteristic[s] of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively." CEQA Guidelines Section 15126.2(d) also cautions against assuming that "growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

The Airport is currently (2011) operating at 48 percent of its annual service volume (ASV). The Federal Aviation Administration (FAA) recommends that when an airport reaches 60 percent of its total ASV then capacity-increasing development should be considered. The proposed Master Plan relies on FAA-approved forecasts of aviation activity at the Airport and provides development scenarios for the short term (2017), intermediate term (2022) and long term (2032). These development scenarios are not only reflective of the level of activity forecast to occur at the Airport, but are dependent on Federal funding cycles and the availability of grant money for aviation projects. (Refer to Chapter Two of the Master Plan for a detailed discussion of the Master Plan's forecast methodology and conclusions and to Exhibit 2G of this Program EIR for the project's proposed Capital Improvement Program.) The Airport is not expected to reach an operational level within the Master Plan's 20-year planning horizon that would require capacity-increasing improvements.

The proposed Master Plan would help to direct growth that is forecast by the FAA to occur at the Airport over the next 20 years and to ensure that it occurs in a safe and efficient manner. This

growth is expected to occur at an annual average rate of less than one percent of total and general aviation operations. Enplanements are expected to grow at an annual average rate of less than three percent, while based aircraft are expected to increase at an annual average rate of less than two percent. This moderate growth has been included in the City's General Plan and is an integral part of the City's overall anticipated economic activity. The previous Airport growth projections were based on the 2003 *Aviation Facilities Plan's* aviation demand forecast, which included scenarios for one to four percent annual growth rate of annual enplaned passengers and two percent per year growth in general aviation (GA) aircraft operations. Thus, new unforecasted growth is not anticipated to occur.

Since the proposed Master Plan recommends redevelopment of the Airport for safety and efficiency reasons, rather than capacity-increasing projects that would allow for additional airport operations, the project would not foster economic or population growth and is not considered growth-inducing. The project would not involve unanticipated employment growth that would substantially increase population or housing demand and would not involve a substantial increase in major public facilities such as extension of water or sewer lines or roads that would facilitate other growth in the area. Rather, the Airport is in an urbanized area that is currently served by all required infrastructure.

The proposed Master Plan does not recommend the construction of additional housing nor would it remove obstacles to population growth or encourage or facilitate other activities that would significantly affect the environment within the cities of Santa Barbara or Goleta. Potential cumulative impacts of the proposed Master Plan itself are discussed in the following section below.

5.5 CUMULATIVE IMPACTS

Pursuant to CEQA Guidelines Section 15130(a), an EIR shall discuss the cumulative impacts of a project in order to determine whether those impacts are cumulatively considerable. "Cumulatively considerable" is defined by CEQA Guidelines Section 15065(a)(3) to include those situations where "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (See also CEQA Guidelines Section 15355(b), which refers to "reasonably foreseeable probable future projects.")

CEQA Guidelines Section 15130(b)(1) sets forth two methods for satisfying the cumulative impacts analysis requirement: (1) the "list-of-projects" approach; and, (2) the "summary-of-projections" approach. Under the former approach, the Lead Agency compiles a "list of past, present, and probable future projects producing related or cumulative impacts." Under the latter approach, the Lead Agency relies on a "summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect." Since this Program EIR is utilizes analysis in~~tiered off~~ the City's Final General Plan EIR, the latter approach has been used for most of the cumulative analysis contained in this document. The exception to this is the cumulative traffic analysis, which is

based in part on a list of projects that have occurred, are occurring, or will occur within the City of Goleta, where the Airport's surrounding street network is located (see Recirculated Draft Program EIR, Appendix D).

Based on the cumulative analysis provided in Chapter Four of this Program EIR, the following possible cumulative effects of the proposed project could occur:

- Cumulative impacts to regional air quality would be Class III, Less than Significant Impact. The proposed Master Plan is consistent with the Santa Barbara County Air Pollution Control District's (APCD) 2013 *Clean Air Plan* (CAP).

- Cumulative impacts to GHG emission goals for the region would be Class III, Less than Significant Impact. The proposed Master Plan is consistent with the City's General Plan and adopted Climate Action Plan.

- The proposed Master Plan would be consistent with rules related to the southern California marine protected areas (MPA) for the Goleta Slough Marine Conservation Area; similarly, it would not preclude measures recommended in the *Goleta Slough Area Sea Level Rise and Management Plan* (Slough Management Plan). It may, however, be inconsistent with existing City Local Coastal Program (LCP) and General Plan policies and zoning regulations regarding protection of the Slough.

  To the extent that adverse impacts occur to Goleta Slough, cumulative impacts would occur to a regional biological resource. Therefore, mitigation and design measures for specific Master Plan projects planned within the G-S-R zoning overlay must ensure that there is no net loss of wetlands and that other resources of the Slough are protected from indirect impacts. As long as project-specific impacts to the Slough are fully mitigated, cumulative impacts to the Slough would be less than significant. Thus, cumulative biological impacts would be Class II, Less than Significant Impact with Mitigation.

- Brome grasses present at the proposed Taxiway H Airfield Safety Project site could provide potential foraging for white-tailed kites, a California Fully Protected species. However, a lack of small mammals that serve as prey for kites, a lack of kite activity in the area north of the runway, and the distance of the Taxiway H project site from known nest locations indicate that the habitat is of low quality and is not essential for nesting white-tailed kites. Relative to the amount of available kite foraging habitat in the region, the potential loss of 6.1 acres of low-quality foraging habitat (1.2 percent of anticipated lost acreage in region) if the Taxiway H Airfield Safety Project is constructed would be Class III, Less than Significant Impact.

- The proposed Master Plan would not generate solid waste above what has already been accounted for by the City through its General Plan and Final General Plan EIR. Thus, the proposed Master Plan's cumulative solid waste disposal impacts have already been evaluated and mitigated through existing and proposed policies and programs of the City's General Plan and would be Class III, Less than Significant Impact.

- Cumulative traffic impacts would be Class I, Significant Environmental Impact unless local and regional traffic improvements are constructed within the City of Goleta. These measures are not within the City of Santa Barbara's ability to implement. Based on the revised Traffic Impact Study (Recirculated Draft Program EIR, Appendix C), in the intermediate and long term (years 2022 and 2032), the project's contribution to cumulative traffic impacts would exceed City of Santa Barbara's adopted cumulative thresholds of significance at two intersections within the project study area (South Fairview Avenue/US 101 northbound ramps and Kellogg Avenue/Hollister Avenue) during the PM peak-hour. The project's contribution to Kellogg Avenue/Hollister Avenue cumulative traffic impacts would also exceed the City of Goleta's adopted cumulative thresholds of significance in the year 2032. ~~The~~ Development at the Airport would contribute an equitable share cost for afternoon peak-hour trips to these intersections. Equitable share will be calculated using the most recent cost for the improvement programmed for these intersections in the Goleta Transportation Improvement Plan (GTIP), and shall be based upon a traffic study prepared pursuant to the City of Santa Barbara Traffic Management Strategy for the Airport Area, including consultation and coordination with the City of Goleta. ~~its fair-share cost allocation to the cost of future traffic improvements related to these impacts (based on the City of Goleta traffic impact mitigation fees)~~.

No cumulative impacts related to cultural resources, geology and soils, hazards or hazardous materials, hydrology and water quality, or land use and planning would occur as a result of the proposed Master Plan.

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Chapter Six

Chapter Six
SUMMARY OF ALTERNATIVES ANALYSIS

6.1 PROJECT OBJECTIVES

As previously discussed in Section 2.1, the primary objective of the Santa Barbara Airport Master Plan (Master Plan) is to provide the City of Santa Barbara (City) with guidance for future development which will safely meet aviation demand at the Airport for the next 20 years, i.e., 2012 to 2032. Accomplishing this in an environmentally sensitive manner is also an objective of the Master Plan.

The City's Airport Department has identified the following goals to be considered in the Master Plan:

- Relocation of general aviation facilities and new general aviation improvements.
- Airfield safety improvements.
- Consolidation of automobile parking associated with the Terminal.
- Terminal expansion.

Exhibit 3A contains a list of specific considerations related to Airport needs and opportunities for improvement; however, no actual development projects are proposed at this time. Future development projects at the Airport would be focused in one of three areas: airfield safety improve-

ments; landside redevelopment north of Runway 7-25; or airfield and landside improvements around the Terminal.

6.2 ALTERNATIVES CONSIDERED BUT REJECTED

Chapter Three of the ~~Draft~~ Program Environmental Impact Report (EIR) summarizes design alternatives considered as part of the master planning effort that were eventually "rejected" in favor of the recommended development concept plan depicted in Exhibit 2B. Several of these preliminary design alternatives are vetted in detail in Chapter Five of the Final Draft Airport Master Plan, which has been incorporated into this Program EIR by reference. The Master Plan originally identified two airfield design alternatives, two terminal area alternatives, and two north landside alternatives. The recommended development concept plan was selected as the best design alternative based on Federal Aviation Administration (FAA) design and safety guidelines and criteria as well as environmental considerations (refer to ~~Draft EIR,~~ **Exhibit 3B**).

In addition, the draft Master Plan originally recommended the demolition of five older hangars (Building Nos. 248, 249, 267, 309, and 317) to make additional room for redevelopment of the north side general aviation area and to remove structures from the floodway. However, based on an historical evaluation of these buildings under Federal, State, and City historic regulations, it was determined early in the EIR process that the demolition of these buildings would result in significant impacts to historical resources under CEQA (Draft Program EIR, Appendix E). Instead, the recommended north side development concept plan was revised to include the retention of Buildings 267, 309, and 317 in their existing locations and the preservation and ultimate relocation of Buildings 248 and 249 out of the floodway.

The replacement of segments of perimeter fencing along Mesa Road was also originally considered in the draft Master Plan. In the long term, replacement of these perimeter fence segments would provide additional control over not only access to the Airport, but to the sensitive biological resources of the Goleta Slough Ecological Reserve (GSER). However, during the environmental scoping process for this Program EIR, the California Department of Fish and Wildlife (CDFW) and the Goleta Slough Management Committee (GSMC) both commented that the perimeter fence impedes the movement of wildlife through the area. Replacement of the fence with a higher chain link fence could exacerbate this situation. Therefore, it was determined that impacts related to higher chain link fencing that would restrict wildlife movement in and out of the Slough were potentially significant.

As mitigation, CDFW recommended that the existing fence be modified at key points to achieve a better balance within the Slough to support coyotes, gray foxes, and bobcats as key predators. This mitigation measure would need to be studied further by the Airport and FAA to ensure that such modifications did not hamper security and wildlife hazard management activities. It was determined that it would be better to reassess the situation in light of the findings of the Airport's ongoing wildlife hazard assessment.

Alternative locations for the Airport would require a comprehensive study that is beyond the scope of this Program EIR. The proposed project is a Master Plan to accommodate minor redevelopment, safety improvements, and expansion of the Terminal to allow its continued safe and efficient functionality through a 20-year planning period. As discussed previously, Section 15126.6 (f)(3) of the CEQA Guidelines states, "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." Therefore, alternative locations have not been evaulated further in this Program EIR.

6.3 COMPARISON OF ALTERNATIVES CONSIDERED

Two alternatives, in addition to the project as proposed, were carried forth for analysis in this Program EIR: a No Project alternative and an Environmentally Superior alternative. **Table 6A** compares the environmental effects of each. Under the No Project alternative, the Airport would remain in its present condition with no improvements to the existing facilities other than general maintenance; the Environmentally Superior alternative would be similar to the project as proposed, but without the Taxiway H Airfield Safety Project and related actions. The primary differences in impact between the project as proposed and the No Project alternative are a reduction in impacts related to demolition or construction, indirect impacts to the Goleta Slough, a reduction in additional impervious surfaces, and inconsistencies with policies of the Airport's Local Coastal Program (LCP) and the City's G-S-R, Goleta Slough Reserve zone. However, the environmental benefits of the project as proposed, for example, removing existing structures within the floodway would not be realized under the No Project alternative.

TABLE 6A
Summary of Alternatives Analysis Comparison
Santa Barbara Airport

		Degree of Impact when Compared to Proposed Project	
Resource Category	**Proposed Master Plan (Proposed Project)**	**No Project Alternative** ~~(Degree of Impact when compared to Proposed Project)~~	**Environmentally Superior Alternative** ~~(Degree of impact when compared to Proposed Project)~~
Air Quality/ Greenhouse Gas Emissions			
Impact AQ-1: Long-term (Operation) Impact	Class III, Less than Significant Impact	Same	Same
Impact AQ-2: Short-term (Demolition or Construction) Impact	Class II, Less than Significant Impact with Mitigation	Less	Less
Impact AQ-3: Cumulative Impact/*Clean Air Plan* Consistency	Class III, Less than Significant Impact	Same	Same
Impact AQ-4: Global Climate Change/Climate Plan Consistency	Class III, Less than Significant Impact	Same	Same
Biological Resources			
Impact BIO-1: Loss of jurisdictional wetlands, uplands, and indirect impact to Goleta Slough	Class II, Less than Significant Impact with Mitigation	Less	Less

TABLE 6A (continued)
Summary of Alternatives Analysis Comparison
Santa Barbara Airport

Resource Category	Proposed Master Plan (Proposed Project)	Degree of Impact when Compared to Proposed Project	
		No Project Alternative	Environmentally Superior Alternative ~~(Degree of impact when compared to Proposed Project)~~
Biological Resources (continued)			
Impact BIO-2: Impacts to protected birds	Class II, Less than Significant Impact with Mitigation	Less	Less
Impact BIO-3: Indirect impacts to adjacent creeks	Class III, Less than Significant	Less	Less
Impact BIO-4: Cumulative impact to Goleta Slough	Class II, Less than Significant Impact with Mitigation	Less	Less
Cultural Resources			
Impact CR-1: Long-term relocation of Bldgs. 248 & 249 out of floodway	Class II, Less than Significant Impact with Mitigation	**Greater - Historic structures would remain in the floodway.**	Same
Impact CR-2: Impacts to Buildings 317, 309, and 267 (eligible for listing as City of Santa Barbara Structures of Merit)	Class III, Less than Significant Impact	Same	Same
Impact CR-3: Future projects could be located within a moderate sensitivity zone for cultural resources	Class II, Less than Significant Impact with Mitigation	Less	Same
Geology and Soils/Hazards and Hazardous Materials			
Impact G/HAZ-1: Risks due to seismic activity	Class II, Less than Significant Impact with Mitigation	Less	Same
Impact G/HAZ-2: Risks due to soil conditions	Class II, Less than Significant Impact with Mitigation (adverse soil conditions); Class III, Less than Significant Impact (erosion)	Less	Same
Impact G/HAZ-3: Risk due to routine handling and transport or accidents involving hazardous materials	Class III, Less than Significant Impact	Less	Same
Impact G/HAZ-4: Risks involving exposure to soil or groundwater contamination.	Class II, Less than Significant Impact with Mitigation	Less	Same
Hydrology and Water Quality			
Impact HYD-1: Potential drainage and water quality impact	Class III, Less than Significant Impact	Less	Less

TABLE 6A (continued)
Summary of Alternatives Analysis Comparison
Santa Barbara Airport

Resource Category	Proposed Master Plan (Proposed Project)	Degree of Impact when Compared to Proposed Project	
		No Project Alternative ~~(Degree of impact when compared to Proposed Project)~~	Environmentally Superior Alternative ~~(Degree of impact when compared to Proposed Project)~~
Impact HYD-2: Potential flooding hazards	Impact 2a: Class III, Less than Significant Impact; Impact 2b: Class IV, Beneficial Impact (re: development within Floodway)	**Greater - Existing structures would remain in the floodway.**	Less - Taxiway H would no longer be proposed for the floodway.
Impact HYD-3: Substantial unmitigated risk of tsunami inundation	Class III, Less than Significant Impact	Same	Same
Land Use and Planning			
Impact LU-1: Impact to established communities	Class III, Less than Significant Impact	Same	Same
Impact LU-2: Compatibility with applicable General Plan policies and other City plans	Class III, Less than Significant Impact	Less	Less
Impact LU-3: Compatibility with SP-6 Plan and SP-6 overlay zone	Class III, Less than Significant	Same	Same
Impact LU-4: Compatibility with Airport's LCP	Class II, Less than Significant with Mitigation	Less	Less
Impact LU-5: Consistency with the City of Goleta's General Plan/Zoning (avigation easements)	Class III, Less than Significant Impact	Same	Same
Impact LU-6: Consistency with the City's General Plan, G-S-R zone, GSER (Taxiway H Airfield Safety Project)	Class II, Less than Significant Impact with Mitigation	Less	Less
Public Utilities (Solid Waste Disposal)			
Impact SW-1: Long-term (operational) impact	Class III, Less than Significant Impact	Unknown	Same
Impact SW-2: Short-term (Demolition and/or Construction) Impact	Class II, Less than Significant Impact with Mitigation	Less	Less
Impact SW-3: Cumulative impact	Class III, Less than Significant Impact	Unknown	Same
Transportation/Traffic			
Impact T-1: Project-specific impacts to traffic and circulation in the short term	Class III, Less than Significant Impact	Same	Same
Impact T-2: Project contributions to cumulative impacts ~~Cumulative project impacts~~ to traffic and circulation in the intermediate term (Kellogg Avenue/Hollister Avenue)	Class I, Significant Environmental Impact[1]	Less	Same

TABLE 6A (continued)
Summary of Alternatives Analysis Comparison
Santa Barbara Airport

Resource Category	Proposed Master Plan (Proposed Project)	Degree of Impact when Compared to Proposed Project	
		No Project Alternative (compared to Proposed Project)	Environmentally Superior Alternative (compared to Proposed Project)
Impact T-3: Project contributions to cumulative impacts ~~Cumulative project impacts~~ to traffic and circulation in the long term (Kellogg Avenue/Hollister Avenue; South Fairview Avenue/US 101 NB ramps)	Class I, Significant Environmental Impact[1]	Less[1,2]	Same[1,2]

[1] Once Senate Bill (S.B.) 743 is implemented, it is possible that project-related cumulative impacts associated with the Atlantic Aviation relocation would no longer be considered significant under CEQA. The vehicle miles traveled (VMT) that are associated with Atlantic Aviation in its new location would be less than its old location since the new location is closer to major arterials (i.e., South Fairview Avenue and Hollister Avenue) as well as US 101.

[2] Some intersections within the study area are forecast to operate below an acceptable level of service with or without trips generated by the project.

6.4 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based on the analysis contained in Chapter Four and summarized in **Table 6A**, the "environmentally superior" alternative involves not constructing the Taxiway H Airfield Safety Project and related projects. This would reduce environmental impacts to Goleta Slough and avoid inconsistencies with the City of Santa Barbara's General Plan land use designation, the Airport's LCP, and G-S-R zoning. Other differences in impact between the project as proposed and the Environmentally Superior alternative are a reduction in impacts related to construction, indirect impacts to Goleta Slough, and a reduction in additional impervious surfaces.

However, the "environmentally superior" alternative would not meet the project's objectives to accommodate future airport operations in a safe manner. Although removing the Taxiway H Airfield Safety Project and related actions from the proposed Master Plan would reduce environmental impacts, it would continue unsafe and inefficient airfield circulation patterns at the Airport that create safety hazards to aircraft using the runway and taxiway system. In FAA Advisory Circular 150/5300-13A, *Airport Design*, the discussion of methods to reduce runway incursions includes the following (FAA ~~2012~~2014):

(c) Limit runway crossings. The airport designer can reduce the opportunity for human error by reducing the need for runway crossings. The benefits of such design are twofold – through a simple reduction in the number of occurrences, and through a reduction in air traffic controller workload.

(d) Avoid “high energy” intersections. These are intersections in the middle third of the runways. By limiting runway crossings to the outer thirds of the runway, the portion of the runway where a pilot can least maneuver to avoid a collision is kept clear.

(f) Avoid “dual purpose” pavements. Runways used as taxiways and taxiways used as runways can lead to confusion. A runway should always be clearly identified as a runway and only a runway.

(g) Indirect Access. Do not design taxiways to lead directly from an apron to a runway. Such configurations can lead to confusion when a pilot typically expects to encounter a parallel taxiway.

If a full-length parallel taxiway north of Runway 7-25 is not provided, aircraft utilizing the north general aviation ramps would continue to cross the active primary runway to get to the Runway 7 threshold. This situation has been identified by FAA as a safety “hot spot.”

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Chapter Seven

Chapter Seven
MITIGATION, MONITORING, AND REPORTING

The following ~~mitigation~~Mitigation, ~~monitoring~~Monitoring, and ~~reporting~~ Reporting ~~program~~ Program (MMRP) has been prepared pursuant to Section 15097 of the *California Environmental Quality Act* (CEQA). Section 15097 requires all State and local agencies establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a mitigated Negative Declaration or specified environmental findings related to Environmental Impact Reports.

The following MMRP for the proposed Master Plan at Santa Barbara Airport describes the mitigation measures identified in the Draft Program Environmental Impact Report (EIR) (as revised by the Recirculated Draft Program EIR), identifies responsible entities for implementing and monitoring the plan, and outlines the mitigation measure timeline. The intent of the MMRP is to identify and enforce a means for properly and successfully implementing the mitigation measures as identified within this Final Program ~~the Draft~~ EIR.

This MMRP is intended to be used by City of Santa Barbara (City) staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. The MMRP will provide for monitoring activities prior to construction, during construction, and following project completion.

Airport staff will be responsible for the following:

- On-site, day-to-day monitoring of construction activities.
- Reviewing construction plans and equipment staging/access plans to ensure conformance with adopted mitigation measures.
- Ensuring contractor knowledge of and compliance with the MMRP.
- Obtaining assistance, as necessary, from technical experts in order to develop site-specific procedures for implementing the mitigation measures.
- Maintaining a log of all significant interactions, violations of permit conditions or mitigation measures, and necessary corrective measures.

In addition, individual projects under the Master Plan may be subject to existing or required permit conditions such as those associated with the Airport's National Pollutant Discharge Elimination System (NPDES) permit and storm water pollution prevention plan (SWPPP), the City's Storm Water Management Program (SWMP), and individual Special Flood Hazard Area development permits/variances, Coastal Development Permits (CDPs), Water Quality Management Plans (LCP Policy C-13), and Construction Phase Erosion Control and Polluted Runoff Control Plans (LCP Policy C-14). The City's Standard Conditions of Approval also apply to projects under the proposed Master Plan.

Mitigation Measure	Description	Implementing Entity	Monitoring Entity	Implementation Schedule	Date Initiated/ Date Completed
Impact AQ-2. Construction and/or building removal occurring under the proposed Master Plan could exceed 25 tons of any criteria pollutant (except CO) within a 12-month period. (Short-term impact)					
AQ/mm-1	As a condition of approval, all construction and/or building removal projects occurring under the proposed Master Plan shall be required to estimate said project's combined emissions from all construction equipment to ensure that the project would not exceed 25 tons of any criteria pollutant except CO within a 12-month period. Standard equipment exhaust mitigation measures recommended by the Air Pollution Control District (APCD) for such projects shall be implemented, as appropriate.	Developer or contractor	APCD	Prior to issuance of Authority to Construct permit from APCD.	
Impact BIO-1 & BIO-4. The proposed Taxiway H Airfield Safety Project could include a loss of jurisdictional wetlands, uplands, and indirect construction impacts to Goleta Slough and sensitive flora and/or fauna. (Project-specific & cumulative impact)					
BIO/mm-1	Programmatic Mitigation Plan. This Programmatic Mitigation Plan is intended to provide a framework for future project-specific Habitat Mitigation and Monitoring Plan(s) (HMMPs) to provide compensatory mitigation for indirect and direct impacts to jurisdictional wetland habitat and established wetland and riparian setback/buffers from these protected habitats under this Program EIR. The HMMPs shall also address impacts to upland (i.e., grassland and shrubland) habitats, when appropriate. For example, under direction of this Programmatic Mitigation Plan, the Taxiway H Airfield Safety Project will be required to submit for regulatory agency (USACE, CDFW, CCC, and City, as appropriate) approval a project-specific HMMP for impacts to jurisdictional wetland and upland areas. Future project-specific HMMPs must include the following requirements and information, as appropriate:	City Planning	Airport staff	Prior to approval of Master Plan	

	1. Mitigation for wetland habitat and and/or wetland and/or riparian buffers shall be a minimum of 4:1 (restoration to impact) ratio and upland habitat (i.e., grassland and shrubland) shall be replaced at a 3:1 ratio in a form and location acceptable to the permitting regulatory agencies. Regulatory agencies may require a higher ratio depending on the habitat value and function that is proposed to be impacted. 2. Habitat mitigation should occur on Airport property (onsite) in lands historically part of the Goleta Slough wetland complex and on wetland and upland areas currently mapped as disturbed or dominated by areas of non-native invasive plant species which would be reasonably expected to establish sustainable wetland, transitional, and upland habitat(s) to the extent feasible. 3. Any mitigation within the GSER shall be authorized by the CDFW and CCC under a LCP amendment. 4. The Airport shall solicit comments from the GSMC, a technical advisory committee for the GSER. 5. Focused biological surveys shall be conducted on potential mitigation area(s) within one year of approval of any future project-specific HMMPs. Depending on the amount of impacts to wetland and upland habitats, more than one mitigation area may require a biological survey. At minimum, the biological survey(s) shall consist of vegetation community mapping, floristic inventory, a wetland delineation and jurisdictional determination, and focused Belding's savannah sparrow surveys and raptor surveys, if suitable habitat exists for these species on the selected mitigation area(s). Additionally, each mitigation area shall be analyzed for physical habitat conditions including hydrology, salinity, and soil(s) by the appropriate technical specialists.				

	6. All sensitive biological resources shall be avoided in the design and during implementation and maintenance of future mitigation. Sensitive biological resources include, but are not limited to, occurrences of nesting Belding's savannah sparrow, southern tarplant, coulter's goldfield, meadow barley, creeping ryegrass, and other native grassland and native wetland habitat (Dudek 2012; Dudek 2012). 7. The Airport should comply with the conditions and recommendations of existing guiding documents to the extent feasible: LCP amendments, Slough Management Plan (GSMC 2015), and the Airport's current WHMP (City of Santa Barbara 2017). 8. The Airport shall assess the potential for an increase in wildlife hazards to airfield operations as described in the WHA (Dudek 2016) and the current WHMP (City of Santa Barbara 2017) with respect to the following criteria: a. Increasing the attractiveness of the Airport to hazard species or groups identified in the WHA/WHMP, as well as other species that may provide a hazard to aircraft. These include, but are not limited to, raptors, turkey vultures, gulls, waterfowl, pigeons and doves, flocks of blackbirds and European starlings, and coyotes. b. Increasing the attractiveness of the Airport to any species covered under a valid Airport depredation permit. c. Providing attractants to wildlife within 250 feet of a runway centerline. d. Attracting threatened or endangered species, California fully protected species, or any species for which the Airport's ability to conduct wildlife				

	hazard management activities (such as visual and acoustic hazing) may be limited. e. Increasing rodent populations on the Airport. f. Inundation of the airfield. g. Increasing trees or shrubs in the airfield vicinity. 9. Restoration strategies shall be proposed that balance the criteria identified in BIO-1.1 through BIO-1.8 as well as agency requirements for wetland and upland restoration. Mitigation Areas 1 through 7 (as identified in Exhibit 4D) and potential restoration strategies have been considered in preparation of the Programmatic Mitigation Plan and shall continually be considered in project-specific HMMP(s). A summary of the mitigation areas, acreage available for mitigation, existing habitats, and potential restored and/or enhanced habitats are presented in **Table 4G**. Characteristics and restoration potential for each mitigation area are provided in **Appendix D** of this Program EIR. 10. As necessary due to sea level rise or other changes in future conditions within the Slough, adaptive restoration measures consistent with the recommendations of the Slough Management Plan shall be implemented. 11. The genetic origin of all native wetland and riparian propagules shall be from the Goleta Slough and for all native upland plants should be from the Goleta Valley. All wetland plants shall have a facultative, facultative wetland, or obligate wetland indictor status per the U.S. Army Corps of Engineers National List of Plant Species that Occur in Wetlands. 12. Restoration shall be phased to ensure that all restoration plantings are in place with sufficient irrigation prior to final inspection. Irrigation shall be reduced or eliminated after Year 2 depending on environmental				

	conditions (i.e., drought may prolong irrigation). The wetland restoration shall be without supplemental irrigation for at least two years prior to final approvals. This could result in a maintenance and monitoring period greater than five years. 13. Prior to commencement of development activities, the Airport shall file a performance bond with the City to complete restoration and maintain plantings for a five-year period. 14. The extent of development shall be restricted to those areas displayed on site grading plans to avoid additional impacts to wetland habitat and wetland and/or riparian buffers. Development boundaries shall be delineated (i.e., using wooden stake with highly visible environmentally-friendly paint) in the field prior to any ground-breaking activities. 15. Performance Criteria. Mitigation success for future project-specific HMMP(s) shall be determined, at minimum, by the following performance criteria: • All installed plants must achieve a 70 percent survival rate by the end of the first year, and an 80 percent survival rate of the remaining plants by the end of the fifth year. • Non-native invasive weeds must remain below 15 percent of the total vegetative cover at all times. Naturalized, non-invasive, non-native grasses are not included in this performance criterion. • Native cover must be 75 percent after three years and 90 percent cover after five years. • All container plants and seeded areas must survive without supplemental irrigation for a minimum of two years.				

	• No single species shall constitute more than 50 percent of the vegetative cover. • No woody invasive species shall be present and herbaceous invasive species, excluding naturalized, non-invasive grasses, shall not exceed five percent cover after five years. • Replacement plants shall be monitored for a minimum of three years to ensure successful establishment. ~~Programmatic Wetland Restoration Plan (PWRP). The PWRP is intended to provide a framework for future project-specific Habitat Mitigation and Monitoring Plans (HMMPs) to provide compensatory mitigation for indirect and direct impacts to jurisdictional wetland habitat and established wetland and riparian set-back/buffers. The PWRP shall be consistent with all Airport operation and management policies, the Wildlife Hazard Management Plan, the *California Coastal Act* and Airport Local Coastal Program (LCP), the *Goleta Slough Area Sea Level Rise and Management Plan* (Slough Management Plan), the *California Fish and Game Code* (CFGC), the *Clean Water Act* (CWA), and other plans and polices that regulate wetland habitat. Under direction of the PWRP, the Taxiway H Airfield Safety Project will be required to submit for regulatory agency (United States Army Corps of Engineers [USACE], California Department of Fish and Wildlife [CDFW], California Coastal Commission [CCC], and City, as appropriate) approval of a HMMP for impacts to jurisdictional areas.~~ ~~Components of the PWRP shall include, at minimum, the following requirements and information:~~				

	~~1. Mitigation for wetland habitat and and/or wetland and/or riparian buffers shall be a minimum of 2:1 (restoration to impact) ratio. Agencies may require a higher ratio depending on the habitat value and function that is proposed to be impacted. Upland habitat shall be replaced at a 1:1 ratio in a form and location acceptable to the Goleta Slough Management Committee.~~ ~~2. Wetland mitigation should occur on Santa Barbara Airport property (onsite) in lands historically part of the Goleta Slough wetland complex and on lands currently mapped as disturbed or dominated by non-native species which would be reasonably expected to establish sustainable wetland habitat.~~ ~~3. The Airport shall comply with the conditions and recommendation of existing guiding documents as well as those under development (i.e., Wildlife Hazard Assessment for the Airport, LCP amendments, and the Slough Management Plan).~~ ~~4. Restoration strategies shall be proposed that balance the criteria identified in Nos. 2 and 3 above, as well as agency requirements for wetland restoration. Mitigation Areas 1 through 4 (see below) and potential restoration strategies shall be considered in preparation of any project-specific HMMPs.~~ ~~**Table 4G** and **Exhibit 4D** identify four potential mitigation areas where areas within or adjacent to the Slough could be restored to create replacement wetlands. Areas 1 and 2 are located southwest of Tecolotito Creek within the existing G-S-R zone; Areas 3 and 4 are located southwest of the intersection of the Airport's existing runway system within the existing A-F (Airfield Facilities) zone. As part of the mitigation effort, if selected, Mitigation Areas 3 and/or 4 would first be rezoned to G-S-R. Combined, the mitigation~~				

	~~areas would provide an opportunity for almost 30 acres of new wetland.~~ ~~The mitigation area(s) shall be selected in consultation with USACE, Regional Water Quality Control Board (RWQCB), and CDFW, as appropriate. The areas would first be re-contoured, and then planted with a variety of short wetland vegetation. The desired plant composition shall be consistent with the Slough Management Plan and compliant with Airport safety regulations (for example saltgrass or meadow barley as key components).~~ ~~5. As necessary due to sea level rise or other changes in future conditions within the Slough, adaptive restoration measures consistent with the recommendations of the Slough Management Plan shall be implemented.~~ ~~6. The genetic origin of all native wetland and riparian propagules shall be from the Goleta Slough. Wetland plants shall be, at a minimum, facultative (FAC) species (i.e., equally likely to occur in wetlands [estimated probability 34 – 66 percent] or non-wetlands) per the USACE definition.~~ ~~7. Restoration shall be phased to ensure that all restoration plantings are in place with sufficient irrigation prior to final inspection. Irrigation shall be reduced or eliminated after Year 2 depending on environmental conditions (i.e., drought may prolong irrigation). The wetland restoration shall be without supplemental irrigation for at least two years prior to final approvals. This could result in a maintenance and monitoring period greater than five (5) years.~~ ~~8. Prior to commencement of development activities, the Airport shall file a performance bond with the City to complete restoration and maintain plantings for a five (5) year period.~~				

	~~9. The extent of development shall be restricted to those areas displayed on site grading plans to avoid additional impacts to wetland habitat and wetland and/or riparian buffers. Development boundaries shall be delineated (i.e., using wooden stake with highly visible environmentally friendly paint) in the field prior to any ground-breaking activities.~~ ~~10. PWRP Timing and Approvals. The Airport shall submit the PWRP to the CCC for review and approval. The PWRP shall also be submitted to the USACE, CDFW, and RWQCB for their review; however, approvals are not required from these agencies. Future project-specific HMMPs will be reviewed and required as part of regulatory permitting (404/401, streambed alteration, etc.). For example, any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (and associated riparian resources, including salt marsh wetlands) of a river or stream may require a Lake and Streambed Alteration (LSA) agreement with the CDFW pursuant to Section 1602 of the CFGC.~~				
BIO/mm-2	During construction of the Taxiway H project, ~~all~~ applicable policies of the LCP shall be ~~required~~implemented, including but not limited to the following: • A buffer strip of a minimum of 100 feet in width shall be maintained in a natural condition along the periphery of all wetland communities. Where development of an airfield safety project renders maintenance of the buffer infeasible, the City shall provide the maximum amount of buffer area feasible and all impacts to wetland habitat shall be mitigated to the maximum extent feasible such that no net loss of wetland habitat occurs (Policy C-4).	Contractor	City Planning or Airport staff	During/post construction	

	• Wetland areas temporarily affected by construction activities shall be restored to pre-construction conditions (Policy C-11). • The project shall incorporate water quality best management practices (BMPs) or a combination of BMPs (per City guidance) that are best suited to reduce pollutant loading to the maximum extent feasible (Policy C-12). • Special-status plant and wildlife protection measures shall be implemented (Policy C-15) (refer to BIO/mm-1). • All construction, habitat mitigation and restoration plans, and special-status plant and wildlife mitigation and protection measures, shall be reviewed and approved by the regulatory agency/agencies having jurisdiction over the identified resource (Policy C-16).				
Impact BIO-2. Potentially significant impacts to the Belding's savannah sparrow (i.e., potential take) could~~would~~ occur as a result of the Taxiway H Airfield Safety Project if this protected species is present during construction. In addition, indirect noise impacts during construction might occur to nesting birds along Carneros Creek. (Project-specific impact)					
BIO/mm-3	No construction shall occur during the avian breeding season (February 1-September 1) unless a survey from qualified biologist with experience in conducting breeding bird surveys finds that no bird breeding habitat exists within 300 feet of the disturbance area (500 feet for raptors) or can state with certainty that such habitat does not contain nesting birds. Project personnel, including contractors working on the site, shall be instructed on the sensitivity of the area. Reductions in nest buffer distance may be approved by the City's Community Development Department depending on the avian species involved, ambient levels of human activity, screening vegetation, or other factors.	City Planning or Airport staff	City Planning or Airport staff	Prior to ground disturbance.	
BIO/mm-4	Taxiway H Airfield Safety Project and its habitat restoration project sites shall be monitored by a qualified biologist for Belding's savannah sparrow. Prior to site preparation and construction activities, the Airport	City Planning or Airport staff	City Planning or Airport staff	Prior to, and during, ground disturbance.	

	shall have a qualified biologist survey all breeding/nesting habitat within the project site every seven days for eight consecutive weeks. Documentation of findings, including negative findings, shall be submitted to the CDFW. Site preparation and construction activities will only begin if no breeding/nesting birds are observed and concurrence has been received from CDFW. If breeding activities or an active nest is located in a work area, site preparation and construction activities shall not begin in that area until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and the young will no longer be impacted by the project. Once site preparation and construction activities have commenced, the project site shall be monitored for Belding's savannah sparrow on a weekly basis. Documentation of findings, including negative findings, shall be submitted to CDFW until construction is complete. Site preparation or construction activities shall be suspended immediately in a given area if the qualified biologist determines that breeding or nesting activity is occurring in that area. Site preparation and construction activities shall not resume until the monitor determines that the breeding and nesting activities described above have stopped. Noise levels will be monitored by a qualified biologist to determine if construction activities are disruptive to Belding's savannah sparrow in or adjacent to the project site. If a significant disruption to foraging behavior is observed, construction activities in the area of disturbance will be stopped immediately until the qualified biologist develops recommendations to reduce or eliminate the disturbances ~~and~~, receives concurrence from CDFW, and required measures are implemented.				

Impact CR-1. The Master Plan proposes to pursue a management plan for the General Western Aero hangars that would mothball and stabilize the buildings in their existing location until such time as they can be relocated out of the floodway. (Project-specific impact)					
CR/mm-1	The following mitigation program shall be implemented: 1. Mothball and stabilize following National Park Service (NPS) Preservation Brief 31; 2. Prepare management plan, which includes: - Nominate for National Register of Historic Properties (NRHP); - Seek approval to move hangars out of floodway to a location on the Airport that would preserve the integrity of the historic property; - Consult with interested parties to propose future uses and explore research/grant funding options; - Based on proposed uses, determine treatment plan to restore, preserve, or rehabilitate per Secretary of Interior standards. 3. Show relocation areas on "Development Concept Map" of proposed Master Plan.	City Planning or Airport staff	City Planning or Airport staff	As soon as possible	
Impact CR-3. Proposed Master Plan projects located within a moderate sensitivity zone of the MARA could have project-specific or cumulative impacts on cultural resources protected by Federal, State or City laws and guidelines. (Project-specific impact)					
CR/mm-2	All future projects under consideration within the Master Plan shall be evaluated based on the screening process set forth in the City's *Master Archaeological Resources Assessment* (MARA). If a proposed project is located within a mapped moderate sensitivity zone, a determination shall be made by the City's Environmental Analyst regarding whether or not all proposed earth disturbance would be confined to areas of previous disturbance. The proposed project shall then follow the appropriate mitigation and reporting requirements provided in the MARA and in reports approved by the City's Environmental Analyst or Historic Landmarks Commission.	City Planning or Airport staff	City Planning or Airport staff	Prior to individual project approval	

	Native American consultation shall occur as each individual project is proposed and shall include, but not be limited to, the list of contacts provided by the Native American Heritage Commission. ~~in response to the environmental scoping process for this EIR.~~				
CR/mm-3	The City's Standard Condition of Approval regarding "Unanticipated Archaeological Resources Contractor Notification" shall be implemented ~~as necessary~~for all projects.	Contractor	City Planning or Airport staff	During construction	
Impacts G/HAZ-1 & G/HAZ-2. Future Master Plan development could be adversely affected by seismic activity or adverse soil conditions. (Project-specific impact)					
G/HAZ/mm-1	The design and construction of load-bearing structures shall be subject to the recommendations of a site- and project-specific geotechnical investigation and/or engineering report. This mitigation is not necessary for minor development projects such as the installation of replacement fencing or above-ground storage tanks, unless required by the building permit.	Developer or contractor	City engineer	During project design	
Impact G/HAZ-4. There is the potential for the exposure of project occupants or construction workers to hazardous materials at the Airport. (Project-specific impact)					
G/HAZ/mm-2	A Construction Contingency Plan shall be developed that addresses methods to control potential migration of any contamination discovered during construction as well as safety practices for on-site construction personnel and the general public. Details of the plan shall include, but not be limited to: • Soils monitoring for identification of contaminated soil during and after construction for all eroded and/or graded soils; • Measures to be taken to protect workers and the public (such as fencing or hazard flagging, covering contaminated soil with plastic, etc.) and to prevent migration of contaminants to the surrounding environment; and	Contractor	City Planning	Prior to project construction	

	• Notification procedures including, but not limited to, Santa Barbara County Environmental Health Services. These Contingency Plans may be incorporated into the Construction Phase Erosion Control and Polluted Runoff Control Plans required per LCP Policy C-14 for projects requiring a CDP (see Section 4.5.2), if appropriate.				
GEO/mm-3	If contamination is discovered, a project-specific remediation plan shall be prepared and implemented per applicable regulations that reduces all contaminant concentrations to acceptable levels prior to issuance of grading or building permits or, if already under construction, prior to resuming work.	Contractor	Airport staff	Before or ~~D~~during project construction	
Impacts LU-4 and LU-6. Recommended projects within the proposed Master Plan, such as the proposed Taxiway H Airfield Safety Project, could result in inconsistencies with LCP policies related to Goleta Slough and with the City's General Plan designation and G-S-R zone for the GSER. Amendments to planning documents and agreements would be necessary to establish policy consistency. (Project-specific impact)					
LU/mm-1	A detailed project-specific impact analysis and mitigation program for the Taxiway H Airfield Safety Project, and associated analysis of the project's consistency with the G-S-R zone and the policies of the Airport's LCP and *California Coastal Act*, shall be conducted during the CDP and/or LCP amendment review process. The analysis shall specifically address project alternatives, mitigation, and/or additional LCP policy requirements necessary to ensure that any permitted impacts to wetland and sensitive habitat and associated buffers will be adequately minimized and mitigated to ensure long-term protection of Goleta Slough habitats and open space.	City Planning	Airport staff	Prior to approval of individual projects	
LU/mm-2	A consistency review of the Taxiway H Airfield Safety Project with the Slough Management Plan shall be conducted during the project-specific CDP and/or LCP amendment review process, as applicable. Project-specific mitigation measures shall be identified and incorporated into the City's CDP, and/or LCP policies shall be identified and incorporated into Airport LCP, where determined necessary and feasible, to	City Planning	Airport staff	Prior to approval of the Taxiway H Airfield Safety Project	

	ensure project consistency with the Slough Management Plan. Required mitigation shall also be evaluated for consistency with the Slough Management Plan restoration goals.				
LU/mm-3	The City of Santa Barbara ~~and the CDFW~~ shall ~~amend~~ undertake a process in coordination with the CDFW toward amending the Cooperative Agreement dated August 25, 1987 (as revised) for the maintenance and management of the Goleta Slough to accommodate the Taxiway H Airfield Safety Project and establish its consistency with the Cooperative Agreement. Amendments to be considered shall include an adjustment of ~~to adjust~~ the boundaries of the GSER to exclude the Taxiway H Airfield Safety Project site, and inclusion of ~~and to include~~ a site of similar habitat value at an area ratio of 1:1 (i.e., if Taxiway H and associated actions removes 11 acres from the GSER, 11 acres would be added to the GSER from available Airport property adjacent to the Slough). ~~This~~ Such a mutually-accepted exchange shall be in addition to required biological mitigation. The Cooperative Agreement amendment shall be presented to the California Fish and Game Commission for concurrence.	City Planning	Airport staff	Prior to approval of the Taxiway H Airfield Safety Project	
Impact SW-2. Some proposed building demolition or construction under the proposed Master Plan could result in significant impacts to regional solid waste disposal. (Short-term impact)					
SW/mm-1	As a condition of approval, projects recommended by the proposed Master Plan must feasibly reduce, reuse, and recycle demolition and construction waste consistent with State and City diversion goals in place at the time.	Developer or contractor	City Planning or Airport staff	Prior/during construction	
Impact T-1 and T-2. Project contributions to cumulative traffic impacts~~Cumulative project impacts could occur to traffic and circulation~~ in the intermediate term (Kellogg Ave/Hollister Ave) and in the long term (Kellogg Ave/Hollister Ave; South Fairview Ave/US 101 NB ramps)					
T/mm-1	All development at the Airport will contribute an equitable share cost allocation for afternoon peak-hour trips added to the Hollister Avenue/Kellogg Avenue intersection and to the Fairview Avenue/US 101 NB ramps. Equitable share shall be calculated using the most recent cost for the improvement programmed	City planning	City Planning or Airport staff	~~When, and if, traffic improvements within the City of Goleta are constructed~~Prior to approval of any project contributing a trip to intersections	

	for these intersections in the Goleta Transportation Improvement Plan (GTIP), and shall be based upon a traffic study prepared pursuant to the City of Santa Barbara Traffic Management Strategy for the Airport Area, including consultation and coordination with the City of Goleta. ~~The Airport will contribute its "fair share" cost allocation of traffic mitigation fees for the future construction of planned Goleta General Plan traffic improvement projects or a multi-modal transit center, based on adopted mitigation fee programs, at the time that such improvement projects go forward.~~			identified in T/mm-1	
T/mm-2	The City will pursue the implementation of transportation demand measures (TDM) measures within new north side lease agreements, consistent with City policy, as north side redevelopment opportunities become available.	Airport staff	Airport staff	As part of north side lease agreements	

Chapter Eight

8.1 REPORT PREPARERS

Persons responsible for preparation of this Program Environmental Impact Report (EIR) document are listed below.

NAME	EXPERTISE	PROFESSIONAL EXPERIENCE
CITY OF SANTA BARBARA		
Andrew R. Bermond, AICP	Airport Project Planning, Environmental Analysis, Coastal Resources Planning	MPA, Public Administration; B.A. History and Environmental Studies. Prepares and manages development review and long-range planning efforts for the 960-acre Santa Barbara Airport; oversees and prepares environmental review documentation, coordinating with up to twelve state, federal, and local government regulatory agencies pursuant to CEQA/NEPA.
EIR PREPARERS		
Coffman Associates		
Jim Harris, PE	Airport Master Planning, Environmental Analysis and Airport Management	B.S., Civil Engineering. Responsible for overall project management of airport master planning, noise and land use compatibility planning and environmental documentation for airports.

Judi Krauss	Transportation and Land Use Planning; Environmental Analysis and Documentation; Socioeconomics	M.A., Economics w/ emphasis in Natural Resource Economics; B.A., Environmental Studies. Experience in transportation and land use planning, socioeconomic studies, and CEQA analysis/documentation. Has worked extensively in Santa Barbara County.
Kory Lewis	Land Use Planning, Environmental Analysis and Documentation, Noise Monitoring and Assessment, Air Quality Analysis	Masters, Urban Planning; B.A., Geography. Experience in land use management and noise assessment, and preparation of environmental documentation for airport development projects. Experienced in working with California Air Pollution Control Districts through southern California.
Eric Pfeifer, LEED Green Associate	Airport Master Planning, Environmental Analysis and Documentation	Masters, Business Administration; B.S., Airport Administration. Experienced in airport master planning and associated environmental documentation under both NEPA and CEQA. Prepares sustainability assessments and plans.
Applied Earthworks, Inc.		
M. Colleen Hamilton, RPA	Senior Architectural Historian	M.A., History; B.A., Anthropology. Conducts "built" environment surveys, building assessments, bridge evaluations, and data recovery of several historic archaeological sites in Santa Barbara. Developed and negotiated Memorandums of Agreement and Environmentally Sensitive Area action plans for historic properties in Santa Barbara.
Aubrie Morlet	Architectural Historian	M.A., Public History; B.A., History with emphasis in Architectural History. Specializes in history and architecture throughout the State. Prepared Historic Resource Evaluation Reports and Historic Property Survey Reports for the West Downtown Historic Building Survey; has a thorough understanding of the City Master Environmental Assessment (MEA) guidelines.

Dudek		
Dave Compton	Ornithologist, Biologist	M.A., U.S. History; B.A., History. Has over 18 years' experience providing natural resources planning expertise through habitat assessments, constraints analyses, impact analyses, managing projects related to biological resources, agency coordination, permitting services, and designing and leading biological surveys. Involved in bird air strike hazard (BASH) issues for the Santa Barbara Airport since 2001.
John Davis IV	Senior Biologist	M.S., Biology; B.S. Ecology. Has over 15 years' experience, specializing in biological assessments; special-status plant and wildlife species surveys; habitat restoration; and environmental regulations, permitting, and compliance.
April Winecki	Coastal Planner; Senior Project Manager	B.S., Environmental Studies. Expert in California Coastal Commission procedures, including the facilitation of LCP amendments and policy consistency analysis. Experienced in land development permit processing, environmental planning, impact and constraint analysis, condition compliance, and mitigation monitoring.
Kimley-Horn and Associates		
David K. Sorenson, PE	Senior Traffic Engineer	M.S., Transportation Planning; B.S. Civil Engineering. Specializes in traffic impact analysis, traffic operations, traffic modeling, military projects, transit planning, community planning, and master planning. Conducted hundreds of transportation and mobility studies ranging from airports, hospitals, shopping centers, military bases, and other commercial and residential developments.
David Park, PE	Traffic Analyst	M.S., Civil and Environmental Engineering (Transportation); B.S. Civil and Environmental Engineering. Specializes in traffic impact analysis studies and has conducted reports for airports, schools, casinos, military bases, residential lots, shopping centers, and other commercial developments.

8.2 LIST OF AGENCIES CONSULTED

The following agencies were notified and input solicited regarding the preparation of this EIR:

California Department of Transportation (Caltrans) – Division of Aeronautics
Caltrans, District 5
California Coastal Commission
California Environmental Protection Agency, Air Resources Board
California Governor's Office of Planning and Research (State Clearinghouse)
California Highway Patrol
California Natural Resources Agency, Department of Conservation
California Natural Resources Agency, Department of Fish and Wildlife (CDFW), Region 5
California Natural Resources Agency, Department of Parks and Recreation
California Natural Resources Agency, Department of Water Resources
California Natural Resources Agency, Office of Historic Preservation
City of Goleta, Advanced Planning Division
City of Goleta, Public Works Department
Federal Aviation Administration (FAA), Western-Pacific Region, Los Angeles Airport District Office
Goleta Slough Management Committee (GSMC)
Native American Indian Commission
Regional Water Quality Control Board, Central Coast Region (3)
Santa Barbara County Air Pollution Control District (SBCAPCD)
Santa Barbara County Association of Governments (SBCAG)
Santa Barbara County Flood Control and Water Conservation District (SBFCD)
State of California Public Utilities Commission
University of California, Santa Barbara (UCSB)
United States Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service

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8.4 ACRONYMS AND ABBREVIATIONS

A.B. – Assembly Bill (California State legislature)
ACM – asbestos-containing materials
A.D. – anno domini (dating system using the birth of Christ as a reference point in time)
ADT – average daily traffic/trips
AHPA – *Archaeological and Historic Preservation Act of 1974*
AIA – Airport Industrial Area
AIP- Airport Improvement Program
ALUC – airport land use commission
ALUCP – Airport Land Use Compatibility Plan
ALUP – Airport Land Use Plan
APCD – Air Pollution Control District
ARC – Airport Reference Code
ARFF – aircraft rescue and firefighting
ASOS – automated surface observation system
ASV – annual service volume (defined as the number of annual aircraft operations that may be accommodated by the runway system at an airport)
ATC – Authority to Construct (type of permit from APCD)
ATCT – airport traffic control tower
A-A-O zone – Airport Approach and Operations (City of Santa Barbara)
A-C zone – Airport Commercial (City of Santa Barbara)
A-F zone – Airport Facilities (City of Santa Barbara)
A-1-1 & 2 zones – Airport Industrial (City of Santa Barbara)

BAAQMD – Bay Area Air Quality Management District
BMPs – best management practices

CAAQS – California Ambient Air Quality Standards
Caltrans – California Department of Transportation
CAP – *Clean Air Plan*
CARB – California Air Resources Board
CAT – Category
CBIA – California Building Industry Association
CBSC – California Building Standards Commission
CCC – California Coastal Commission
CCR – California Code of Regulations
CDFG – California Department of Fish and Game (in January 2013, the CDFG was renamed CDFW)
CDFW – California Department of Fish and Wildlife
CDP – Coastal Development Permit

CEQA – *California Environmental Quality Act*
CERCLA – *Comprehensive Environmental Response, Compensation, Liability Act* (also known as Superfund)
CESA – *California Endangered Species Act*
CFCG – *California Fish and Game Code*
CFR – Code of Federal Regulations
CH_4 - methane
CIP – Capital Improvement Program
CIWMP – *California Integrated Waste Management Plan*
CMP – Congestion Management Plan
CNDDB – California Natural Diversity Database
CNEL – Community Noise Equivalent Level
CNPS – California Native Plant Society
CO – carbon monoxide
CO_2 -carbon dioxide
CRHR – California Register of Historic Resources
CRPR – California Rare Plant Rank
CSC – California Species of Concern
CWA – Federal *Clean Water Act*
cy – cubic yards
C-M zone – Commercial Manufacturing (City of Santa Barbara)
C-R zone – Commercial Recreation (City of Santa Barbara)

DNL (also known as L_{dn}) – Day-Night Noise Level
DOD – Federal Department of Defense
DOT – Federal Department of Transportation
DPR – California Department of Parks and Recreation
DPS – distinct population segment
DTSC – California Department of Toxic Substances Control
DTWL – dual tandem wheel loading
du – dwelling unit
DWL – dual wheel loading

EB – eastbound
EDMS – Emissions and Dispersion Modeling System (a computer program developed by the military and FAA to assess the air quality impacts of proposed airport development projects)
EFH – Essential Fish Habitat
EIR – Environmental Impact Report
E.O. – Executive Order
EPA – Federal Environmental Protection Agency
ESA – Federal *Endangered Species Act*
ESHA – environmentally sensitive habitat area (areas protected by the *California Coastal Act*)

FAA – Federal Aviation Administration

FAC – Facultative; equally likely to occur in wetlands (estimated probability 34 – 66 percent) or non-wetlands
FBO – fixed base operator
FEMA – Federal Emergency Management Agency
FIRM(s) – Flood Insurance Rate Map(s)
FP – Fully Protected
FR – Federal Register
FUDS – Formerly Used Defense Sites
FY – fiscal year

GA – general aviation
Gal. – gallon (or gallons)
GHG(s) – greenhouse gas (or gases)
GPS – global positioning system
GSE – ground service equipment
GSEMP – *Goleta Slough Ecosystem Management Plan*
GSER – Goleta Slough Ecological Reserve
GSMC – Goleta Slough Management Committee
GSSMCA – Goleta Slough State Marine Conservation Area
GTIP – Goleta Transportation Improvement Plan
GWP – global warming potential
GVSH – Goleta Valley Cottage Hospital
G-S-R zone – Goleta Slough Reserve Zone (City of Santa Barbara)

HABS/HAER - Historic American Buildings Survey/Historic American Engineering Record
HCM – Highway Capacity Manual
HIRL – high intensity runway edge lighting
HMMP – habitat mitigation and monitoring plan
H_2O – water vapor

ICC – International Code Council
ICU – Intersection Capacity Utilization method
ILS – instrument landing system
IPCC – Intergovernmental Panel on Climate Change
IUCN – International Union for Conservation of Nature and Natural Resources
IWMF – Integrated Waste Management Facility

LAX – Los Angeles International Airport
LCP – Local Coastal Program
LiDAR – Light Detection and Ranging topographic data
LNAV – lateral navigation
LOS – Level of Service
LPV - localizer performance with vertical guidance
LR – locally rare (per *Rare Plants of Santa Barbara County*)
LSA – Lake and Streambed Alteration

MALSR – medium intensity approach lighting system (with runway alignment indicator lights)
MARA – *Master Archaeological Resources Assessment for the Santa Barbara Municipal Airport*
MBTA – *Migratory Bird Treaty Act of 1918*
MCAS – Marine Corps Air Station
MCMs – minimum control measures
MEA-CR – *Master Environmental Assessment* and its *Guidelines for Archaeological Resources and Historic Structures and Sites* (City of Santa Barbara document)
MIRL – medium intensity runway edge lighting
MITL – medium intensity taxiway lighting
MMRP – mitigation, monitoring, and reporting program
MOA – Memorandum of Agreement
MPA – marine protection area
MRS – Munitions Response Site
MSA - *Magnuson-Stevens Fishery Conservation and Management Act*
msl – mean sea level
MT CO_2e – metric tons of carbon dioxide equivalent (GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalent" [CO_2e]. The CO_2e for a gas is derived by multiplying the mass of the gas by the associated global warming potential [GWP], i.e., potential of a gas or aerosol to trap heat in the atmosphere, such that MT CO_2e = [metric tons of a GHG] x [GWP of the GHG]. For example, the GWP for CH_4 is 21.)
MTD – Metropolitan Transit District
M-RP zone – Industrial Research Park (City of Goleta)
M-S-GOL zone – Service Industrial (City of Goleta)

NAAQS – National Ambient Air Quality Standards
NAVD88 – North America Vertical Datum of 1988
NB – northbound
NEPA – *National Environmental Policy Act*
NHPA – *National Historic Preservation Act of 1966*
NMFS – National Marine Fisheries Service
NOAA – National Oceanic and Atmospheric Administration
~~NOAA Fisheries – National Marine Fisheries Service~~
NOP – Notice of Preparation
NO_2 – nitrogen dioxide
NO_x – nitrogen oxides
NPDES – National Pollutant Discharge Elimination System
NPIAS – National Plan of Integrated Airport Systems
NPL – National Priorities List
NPS – National Park Service
NRC – Natural Research Council
NRHP – National Register of Historic Places
N_2O – nitrous oxide

OHP – California Office of Historic Preservation
OHWM – ordinary high water mark

OPR – Governor's Office of Planning and Research
O_3 - ozone

PAC – Airport Master Plan advisory committee
PAPI – precision approach path indicator
Pb – lead
PCBs – polychlorinated biphenyls
PM – particulate matter
$PM_{2.5}$ – particulate matter measuring 2.5 micrometers in diameter
PM_{10} – particulate matter measuring 10 micrometers or less in diameter
PRC – California Public Resources Code
PTO – Permit to Operate (type of permit from APCD)
PU zone – Public Utility (County of Santa Barbara)
PUC – California Public Utilities Code
PWRP – programmatic wetland restoration plan
P-R zone – Park & Recreational (City of Santa Barbara)
RCRA – *Resource Conservation Recovery Act*
R&D – research and development
REC zone – Recreation (County of Santa Barbara)
REIL – runway end identifier lighting
ROC – reactive organic compounds
RPZ – runway protection zone
RTP-SCS – *Regional Transportation Plan and Sustainable Communities Strategy*
RSA – runway safety area
RVZ – runway visibility zone
RWQCB – Regional Water Quality Control Board

SAA – *State Aeronautics Act*
SB – southbound
S.B. – Senate Bill (California State legislature)
SBA – Santa Barbara Municipal Airport
SBCAG – Santa Barbara County Association of Governments
SBCAPCD – Santa Barbara County Air Pollution Control District
SBFCD – Santa Barbara County Flood Control and Water Conservation District
SCH – State Clearinghouse (California Office of Planning and Research)
sf – square foot (or feet)
SMOOTH – Santa Maria Organization of Transportation Helpers
SO_2 - sulfur dioxide
SO_x - sulfur oxides
SPCC – spill preventions control and countermeasures
SP-6 zone – Airport Industrial Area Specific Plan (City of Santa Barbara)
SR – State Route
SWL – single wheel loading
SWMP – Storm Water Management Program
SWPPP – storm water pollution prevention plan

sy – square yard (or yards)
S-D-3 zone – Special District 3 Coastal Overlay (City of Santa Barbara)

TAF – Terminal Area Forecast
TDM – travel demand management
TOFA – taxiway object free area
tpy – tons per year
TRACON – Terminal Radar Approach Control
TSCA – *Toxic Substances Control Act*
tsf – thousand square feet

U.S. – United States
USACE – United States Army Corps of Engineers
USC – United States Code
UCSB – University of California, Santa Barbara
USFWS – United States Fish and Wildlife Service
USGS – United States Geologic Survey
USTs – underground fuel storage tanks
UXO – unexploded ordnance

V/C – volume to capacity ratio
VMT – vehicle miles traveled
VNAV – vertical navigation
VOCs – volatile organic compounds
VOR – very high frequency omni-directional range

WB – westbound
WHA – Wildlife Hazard Assessment
WHMP – Wildlife Hazard Management Plan
WQMP – Water Quality Mitigation Plan

Zone AE – FEMA flood zone definition indicating a Special Flood Hazard Areas Subject to Inundation by the 1% Annual Chance Flood where Base Flood Elevations have been determined.

Appendix A

Appendix A
AGENCY AND PUBLIC COMMENTS AND RESPONSES ON THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

During the 45-day public review period on the Draft Program Environmental Impact Report (EIR), from August 31, 2015 through October 16, 2015, the City of Santa Barbara received two written comment letters. Requests were then made by several additional agencies or organizations for a two-week extension of the public review period, which was granted. A total of 11 written comment letters were received by October 30, 2015, and are included in this appendix. In addition, four oral comments were received – one at an Airport Commission meeting, held on September 16, 2015, and three at a City Planning Commission hearing, held on October 1, 2015.

This appendix contains all public comments received on the Draft EIR, as well as written responses, and is organized as follows: First, all comment letters with specific concerns or questions have been reproduced and specific responses have been provided. Second, minutes of the two public meetings held on the EIR are included, with specific responses to oral comments provided. In one case, additional written material was presented to the City Planning Commission and is included following the hearing minutes.

In some cases, text and exhibit edits have been made in the Recirculated Draft EIR in response to comments received. These text (and exhibit) edits have been primarily to:

- provide clarification (text and exhibits);
- update information that has become available since the publication of the Draft EIR;
- provide additional analysis and mitigation for impacts to Biological Resources;
- address recent court cases regarding the treatment of sea level rise under the *California Environmental Quality Act*;
- provide additional analysis and mitigation for impacts to Land Use and Planning;
- update the analysis and mitigation of Transportation/Traffic using the City of Goleta's TRAFFIX traffic impact analysis software and Santa Barbara County Association of Governments' (SBCAG) *Congestion Management Plan* conventions; and
- incorporate all revisions into summary sections of the EIR.

The following is a list of all comments that were received during the official public review period:

NAME/ORGANIZATION	DATE	COMMENT	PAGE
Written Comments:			
1. Public Utilities Commission	August 31, 2015	PUC 1 - 4	A-3
2. Heal the Ocean	October 16, 2015	OCEAN 1- 12	A-5
3. Santa Barbara County Association of Governments	October 19, 2015	SBCAG 1 - 6	A-14
4. Gordon A. Feingold	October 27, 2015	GF 2-12	A-18
5. Santa Barbara County Air Pollution Control District	October 28, 2015	APCD 1 - 4	A-23
6. California Department of Fish and Wildlife	October 29, 2015	CDFW 1 - 18	A-26
7. Carl and Susan Hopkins	October 30, 2015	CSH 1 - 8	A-40
8. City of Goleta	October 30, 2015	GOL 1 - 78	A-44
9. Santa Barbara Channelkeeper	October 30, 2015	SBCh 1 - 4	A-80
10. Santa Barbara Audubon Society	October 30, 2015	AUD 1 - 32	A-83
11. Goleta Slough Management Committee	October 30, 2015	GSMC 1 - 29	A-98
Oral Comments:			
City of Santa Barbara Airport Commission minutes	September 16, 2015		A-115
- Gordon Feingold		GF -1	A-116
City of Santa Barbara Planning Commission minutes	October 1, 2015		A-119
- Mathew Clint Orr		ORR - 1	A-121
- Tom McGregor		McG 1 - 2	A-121
- Robert James Tribble		RJT -1	A-121
- Mathew Clint Orr Planning Commission submittal			A-131

STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
(213) 576-7083

August 31, 2015

Andrew Bermond
City of Santa Barbara
601 Norman Firestone Road
Santa Barbara, CA 93117

Dear Andrew:

Re: SCH 2014061096 Santa Barbara (SANTA BARBARA) Airport Master Plan - DEIR

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Branch (RCEB) has received the *Draft Environment Import Report (DEIR)* from the State Clearinghouse for the proposed City of Santa Barbara (City) Airport Master Plan. PUC1

According to the DEIR, the project area includes active railroad tracks owned by the Union Pacific Railroad Company. RCEB recommends that the City add language to the Airport Master Plan so that any future development adjacent to or near the rail right-of-way (ROW) is planned with the safety of the rail corridor in mind. PUC2 New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. PUC3 Mitigation measures to consider include the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes, and continuous vandal resistant fencing or other appropriate barriers to prevent trespassers onto the railroad ROW. PUC4

If you have any questions in this matter, please contact me at (213) 576-7076, ykc@cpuc.ca.gov.

Sincerely,

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings Engineering Branch
Safety and Enforcement Division

C: State Clearinghouse

Response to Letter 1
State of California Public Utilities Commission (PUC)
Dated August 31, 2015

PUC-1: This comment states that the PUC has jurisdiction over the safety of highway-rail crossings in California.

Response: Comment noted.

PUC-2: This comment states that the project area analyzed within the Draft EIR includes active railroad tracks (i.e., the Union Pacific Railroad [UPRR]) and recommends that the City add language to the Airport Master Plan to address future development adjacent to or near the rail right-of-way.

Response: Although there are railroad tracks within the general vicinity of the Airport, the project area analyzed within the Draft EIR, as shown in Exhibit 2B, does not include the nearby railroad tracks. In fact, all areas of the Airport affected by the recommended Development Concept Map are located south of Hollister Avenue, with only one exception – an avigation easement is proposed over the portion of the Runway 15R-33L runway protection zone that is located just north of Hollister Avenue. This avigation easement does not overlie the UPRR tracks or its right-of-way, nor does it propose any physical development on the ground.

PUC-3: This comments states that new developments may not only increase traffic volumes at streets and intersections, but also at at-grade railroad crossings. The comment also addresses pedestrian circulation patterns and compliance with the *Americans with Disabilities Act*.

Response: The only at-grade crossing of the UPRR railroad within a mile of the Airport is at Kellogg Road, located approximately 0.7 mile east of S. Fairview Avenue. No project-related vehicular or pedestrian traffic will result in an increase across this at-grade crossing.

PUC-4: This comment suggests mitigation measures for impacts to railroads.

Response: No impacts to railroads will occur as a result of the proposed Airport Master Plan; therefore, no mitigation is required.

HEAL THE OCEAN

1430 Chapala Street, Santa Barbara, CA 93101;
PO Box 90106, Santa Barbara, CA 93190; Telephone (805) 965-7570; fax (805) 962-0651
www.healtheocean.org

October 16, 2015

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

Re: Draft Program Environmental Impact Report on the Proposed Airport Master Plan

Dear Mr. Bermond,

Heal the Ocean has had the opportunity to review the draft Environmental Impact Report (EIR) for the Proposed Airport Master Plan and we have several concerns regarding the document's proposed sea level rise mitigation measures. We have been following sea level rise planning efforts in the region for several years now and have previously provided input on the need for more progressive sea level rise planning efforts within the City, and specifically the Airport, which we laid out in our August 2012 comments on the City's Climate Action Plan. We appreciate staff's engagement in dialogue with Heal the Ocean on these issues to date, but we feel strongly that the document's proposed measures do not fully address projected sea level rise at the project site. OCEAN1

Projected Sea Level Rise at the Santa Barbara Airport

The City of Santa Barbara Airport ("the Airport") is already extremely vulnerable to 100-year flood events and will only become *more* vulnerable as sea level rise progresses and accelerates as year 2100 approaches. According to flood estimates and projections included in Figure 18.2 from the EIR for the Plan Santa Barbara (reproduced below as Figure 1), most Airport facilities are already vulnerable to inundation in a 100-year flood event under year 2000 baseline conditions. In analyzing these estimates and projections, the 2012 Santa Barbara Sea-Level Rise Vulnerability Study states: OCEAN2

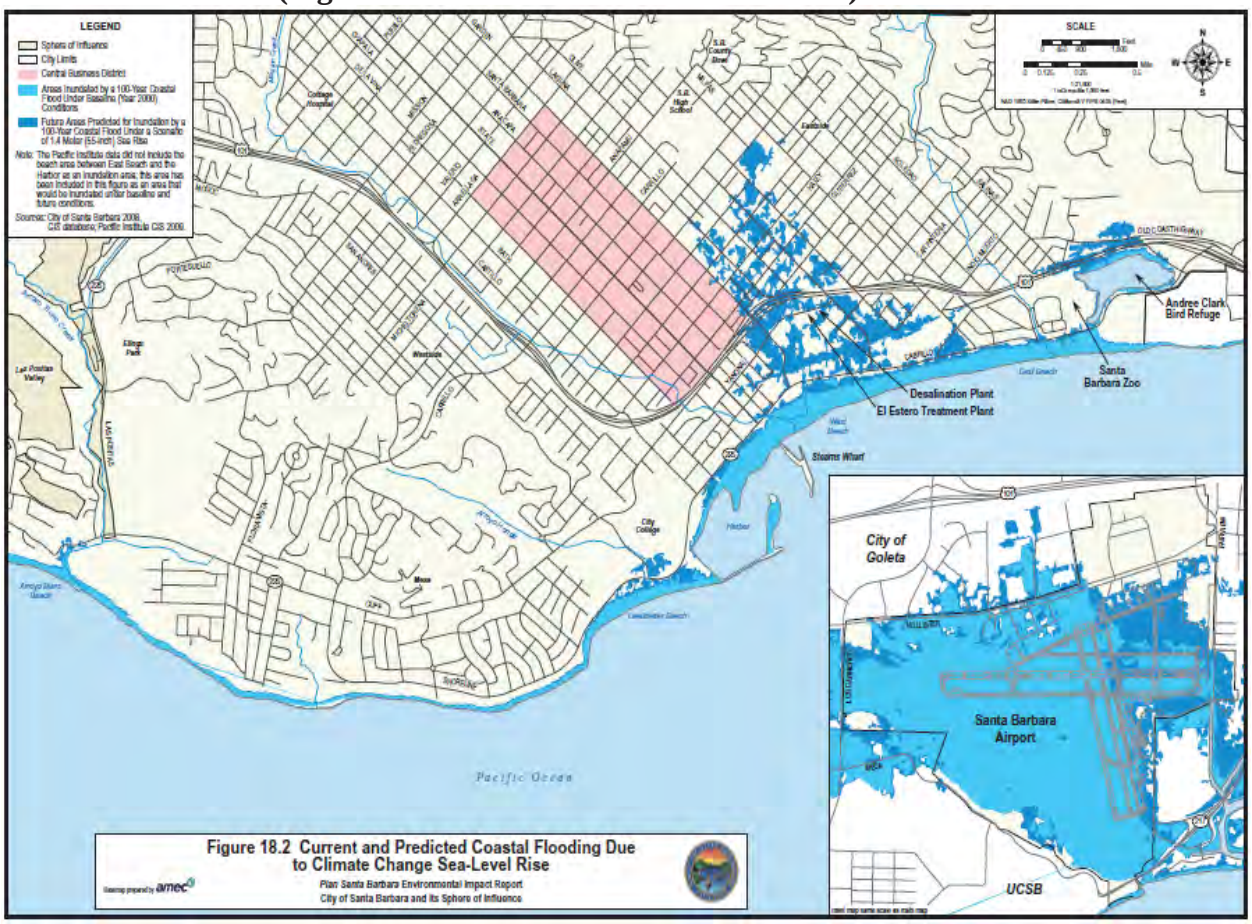
> *"Under present conditions, most of the area between Los Carneros Road in the west, Hollister in the north, and Fairview in the east, is projected to be flooded during a 100-year event, as it has in the past.*

> *With a rising sea level, the frequency and magnitude of flooding in the Goleta Slough and Airport area can be expected to increase. The Current and Predicted Coastal Flooding Map (Plan Santa Barbara EIR) also highlights the areas to be affected by a 100-year* OCEAN3

coastal flood with 55 inches (1.4 meters) of sea-level rise (near the high end of the projections that the State is currently using for the year 2100). "[1]

This analysis of existing conditions is corroborated by flood events at the airport over the last five decades. The appendix of this letter includes several photographs reproduced from the City of Santa Barbara Sea-Level Rise Vulnerability Study that show extensive flooding at the Airport in 1969 and 1995.

Figure 1 – 100-Year Flood Events for Existing Conditions and Projected 2100 Sea Level Rise Scenario (Figure 18.2 from the Plan Santa Barbara)[2]



OCEAN3 cont'd

<u>The draft EIR does not Adequately Mitigate for Projected Sea Level Rise</u>

The incorporated mitigation measures (HYD/mm-1 & HYD/mm-2) for sea level rise do not fully and effectively address projected impacts from sea level rise at the Airport.

OCEAN4

Hydrology and Water Quality mitigation measure-2 in the draft EIR would require new and reconstructed buildings to be raised one foot above *existing* base flood elevations. However, this one foot minimum would certainly not provide adequate protection under

OCEAN5

[1] Griggs, Gary, and Nicole L. Russell (University of California, Santa Cruz). 2012. ***City of Santa Barbara Sea-Level Rise Vulnerability Study.*** California Energy Commission. Publication number: CEC-500-2012-XXX, p. 43.

[2] City of Santa Barbara. Certified Final Program Environmental Impact Report for the *Plan Santa Barbara* General Plan Update – Volume I. AMEC Earth & Environmental, Inc., Sept. 2010, p. 18-11. <http://www.youplansb.org/docManager/1000000694/18.0_Global_Climate_Change.pdf>.

future sea level rise scenarios. Even if a project started *today*, the 75 year lifespan, as included in the draft EIR, would push a project into the 2090's, which would certainly include sea level rise greater than one foot. In other words, raising projects by one foot would not protect against the draft EIR's estimates of five feet in sea level rise by the end of the century.

OCEAN5 cont'd

While hydrology and Water Quality mitigation measure-1 is certainly meant to address this gap by mandating the evaluation of the "best available science" into the planning process for future individual projects within the Airport Master Plan, these mitigation measures taken as a whole do not represent an appropriately conservative approach.

OCEAN6

The draft EIR should be revised so that all individual projects within the Airport Master Plan incorporate a minimum of one foot base flood elevation above projected 2100 sea level rise scenarios. Individual sea level rise analysis, as included in mitigation measure-1, must still be required under this higher baseline. This additional analysis can be used to adjust the baseline to higher or lower levels based on the best available science at the time and conditions at individual projects.

This higher baseline is appropriate because the design life of any future project at the Airport is certain to last until nearly 2100, if not beyond, at which time sea level rise is expected to have accelerated considerably.

OCEAN7

Furthermore, we find the application of "thicker pavement lifts during regular intervals" as wholly inadequate to address future inundation from sea level rise. The draft EIR states that such a strategy may lose effectiveness over time, the draft EIR gives no indication of potential elevation increases from such a strategy, nor does the draft EIR provide evidence to conclude that such a strategy could even address existing flooding at the Airport.

OCEAN8

Basis for Sea Level Rise Projections Unclear

Based on the information provided in the draft EIR, the source of staff's sea level rise projections of "approximately five feet over the next 85 years" is not entirely clear. The draft EIR does mention the *Goleta Slough Sea Level Rise* report, which is referenced as recommending policies to "accommodate at least five feet of sea level rise;" however, it is not clear from the draft EIR where these projections originated. It was not possible for Heal the Ocean to evaluate these projections within the *Goleta Slough Sea Level Rise* report because that report is not available to the public, at least as of the submission of this letter.

OCEAN9

OCEAN10

The draft EIR should be revised to make the basis of its sea level rise projections clear. If it is the *Goleta Slough Sea Level Rise* report, then that study should be cited and included in the appendix of the final EIR.

Water Quality Impacts from Stormwater Runoff

Heal the Ocean's primary concerns with the draft EIR entail the need for mitigation of projected sea level rise impacts; however, we would be remiss if we did not mention our intent to evaluate future projects at the Airport for stormwater impacts and our expectation that the City will comply with all provisions of the City's Storm Water Management Plan (SWMP), in addition to the Airport's storm water pollution prevention plan (SWPPP). Our organization provided input on the formulation of both documents and we will continue to

OCEAN11

track their implementation to ensure that the Airport adequately manages stormwater runoff. OCEAN11 cont'd

Conclusion

Heal the Ocean maintains that far more must be done at the Airport and beyond to prepare for the effects of climate change. The vast majority of the Airport is already vulnerable to impacts from a 100-year flood event and this will only become more severe as sea level rise accelerates. It need not be stated that a 100-year flood event does not mean it could happen in 100 years, it could happen *tomorrow*.

The draft EIR for the Airport Master Plan must do more to mitigate the serious impacts that are not only possible, but expected, for the Airport. OCEAN12

Sincerely,





Hillary Hauser, Executive Director

James Hawkins, Policy Analyst

Appendix:
Historic Photographs of Flooding at the Santa Barbara Airport



Santa Barbara Airport Parking Lot in 1969[3]



Santa Barbara Airport in 1969[4]

[3] Reproduced from Griggs, Gary, and Nicole L. Russell (University of California, Santa Cruz). 2012. ***City of Santa Barbara Sea-Level Rise Vulnerability Study***. California Energy Commission. Publication number: CEC-500-2012-039, p. 45.
[4] Ibid., p. 46.



Santa Barbara Airport in 1995[5]

[5] Ibid.

Response to Letter 2
Heal the Ocean (OCEAN)
Dated October 16, 2015

OCEAN-1: This comment introduces the commenter's concerns regarding sea level rise at the project site.

Response: Thank you for your comments. The City believes sea level rise has been adequately addressed under Section 4.5, Hydrology and Water Quality (see Recirculated Draft EIR).

OCEAN-2: This comment states that the Airport is already vulnerable to inundation in a 100-year flood event under year 2000 baseline conditions.

Response: Comment noted. The Airport and Goleta Slough are anticipated to experience increased flood hazards as a result of global climate change. The Draft EIR discusses this fact in Section 4.5 and states, "The only portions of the Airport that are not located within the 100-year floodplain are sections of the Airport Industrial Area located north of Hollister Avenue." In addition, Ex. 4G of the Draft EIR shows the most recent Federal Emergency Management Agency's Flood Insurance Rate Maps for the Airport, which are dated December 4, 2012.

OCEAN-3: This comment discusses the sea level rise predictions of the 2010 Santa Barbara Sea-Level Rise Vulnerability Study, including Figure 18.2 from the Final EIR on *Plan Santa Barbara* General Plan Update. This figure shows the extent of flooding at the Airport if 55 inches (1.4 meters) of sea-level rise occurs by the year 2100, which is near the high end of the State's projections in the City Sea-Level Rise Vulnerability Study.

Response: Thank you for your comments. The City believes these concerns have been adequately addressed under Section 4.5, Hydrology and Water Quality (see Recirculated Draft EIR).

OCEAN-4: This comment states that the mitigation measures contained in Section 4.5.7 of the Draft EIR do not adequately address projected impacts from sea level rise at the airport.

Response: Based on recent CEQA case law, the Draft EIR inaccurately characterized flood hazards resulting from global climate change as a project impact. Pursuant to *California Building Industry Association (CBIA) vs. Bay Area Air Quality Management District (BAAQMD) (2015)*, CEQA analysis "is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents" (CBIA, 62 Cal. 4th at 97). The sea level rise analysis has been updated in the Recirculated Draft EIR (Section 4.5), and is retained for informational

purposes only. The proposed mitigation measures to address sea level rise remain as recommended mitigation measures.

OCEAN-5: This comment states that the recommended measure to require that new and reconstructed buildings to be raised one fool above existing base flood elevations is no adequate.

Response: The proposed mitigation would not prevent flooding in all instances over the next 84 years. The Airport Master Plan does not propose to abate all existing flood hazards. The intent of recommended mitigation measures in the Recirculated Draft EIR (HYD/mm-1 and HYD/mm-2) is to minimize future flood impacts to the extent feasible.

OCEAN-6: This comment states that using "best available science" into the Coastal Development Permit approval process for future Airport Master Plan projects is not an "appropriately conservative approach."

Response: Thank you for your comment. There are several Airport Master Plan projects for which it is impractical to predict both the useful life and the hazards presented by sea level rise. The useful life of airfield pavements is between 10 and 60 years depending upon stress/loads over time, and paved surfaces may have no more than a 1-inch lip from the surface according to FAA design standards. The Airport Master Plan will require the Airport Department to design capital improvements to meet the most recent forecast for the specific project's useful life. This avoids unnecessary construction costs while minimizing the hazard presented by sea level rise.

OCEAN-7: This comment states that all Airport Master Plan projects should incorporate a minimum of 1-foot base flood elevation above projected 2100 sea level rise scenarios.

Response: See previous response to comment **OCEAN-6**. Given the range of potential sea level rise scenarios that could occur over the next 85 years, it is not reasonable to mandate a "one size fits all" base flood elevation requirements at this time. The City believes that assessing projects through the Coastal Development Permit process using the most accurate sea level rise forecasts available at the time is a more beneficial approach.

OCEAN-8: This comment states that applying thicker pavement lifts during regular intervals is inadequate to address future inundation from sea level rise.

Response: Refer to responses to comments **OCEAN-5**, **-6**, and **-7**. Recommended mitigation measures in the Recirculated Draft EIR (HYD/mm-1 and HYD/mm-2) encourage the Airport Department to incorporate flood avoidance measures during periodic reconstruction or rehabilitation of airfield infrastructure. The purpose of this measure is to minimize future flood

levels due to sea level rise, not to abate existing or future flood risk presented by the environment. This is a bigger issue that is beyond the scope of the Airport Master Plan.

OCEAN-9: This comment questions the source of information on sea level rise projections provided in the Draft EIR and the Goleta Slough Sea Level Rise report.

Response: The sea level rise projections discussed in the Draft EIR were consistent with current estimates agreed to by the Goleta Slough Management Committee in its draft Final Management Plan (dated February 2015). The *Goleta Slough Sea Level Rise and Management Plan* document was finalized subsequent to the preparation of the Draft EIR. In response to this and other similar comments, it has been incorporated by reference into the Recirculated Draft EIR.

OCEAN-10: This comment states that the commenter was not able to evaluate the sea level rise projections within the Goleta Slough Sea Level Rise report because it was not available to the public (as of the date of this comment letter).

Response: See response to comment **OCEAN-9**. The *Goleta Slough Sea Level Rise and Management Plan* was finalized subsequent to the preparation of the Draft EIR and is available for public review at http://www.goletaslough.org. In addition, the draft Management Plan was made available to Heal the Ocean through its representative on the Goleta Slough Management Committee throughout the planning process.

OCEAN-11: This comment states that Heal the Ocean will evaluate future projects at the Airport for storm water impacts and expects that the Airport will comply with the City of Santa Barbara Storm Water Management Program (SWMP) and the Airport's storm water pollution prevention plan.

Response: Compliance with existing regulations is assumed in the Draft Airport Master Plan as well as the Draft EIR. Site-specific SWMP requirements will be included in the specific permit application process. The Draft EIR does not evaluate the efficacy of the SWMP.

OCEAN-12: This comment states that the Airport must do more to prepare for the effects of climate change and that the Draft EIR must more to mitigate expected impacts.

Response: Pursuant to *CBIA v. BAAQMD*, the Airport Department cannot be obligated to address sea level rise impacts through the CEQA process. The Draft EIR retains recommendations to minimize anticipated future flooding that may be attributed to global climate change. However, the City recognizes that complete avoidance of these potential flooding impacts is not economically feasible.

SBCAG
santa barbara county association of governments
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CITY OF SANTA BARBARA
PLANNING DIVISION

October 19, 2015

Andrew Bermond, AICP
Project Planner
City of Santa Barbara
Planning Division
P.O. Box 1990
Santa Barbara, CA 93102-1990

Re: Comments on the Draft Environmental Impact Report for the Santa Barbara Airport Master Plan

Dear Mr. Bermond:

The Santa Barbara County Association of Governments (SBCAG) has reviewed the Draft Environmental Impact Report for the draft Santa Barbara Airport Master Plan. As the Airport Land Use Commission for Santa Barbara County, SBCAG is responsible for reviewing the draft Santa Barbara Airport Master Plan for consistency with the adopted Airport Land Use Plan under State law. The City referred the draft Master Plan to SBCAG for a consistency review in early October and SBCAG staff will be bringing the draft Master Plan forward to the Airport Land Use Commission for a determination of consistency later this year. SBCAG1

Among its other roles, SCBAG is also designated as the Metropolitan Planning Organization, Regional Transportation Planning Agency and Congestion Management Agency for Santa Barbara County. In these capacities, SBCAG is responsible for development of the Regional Transportation Plan-Sustainable Communities Strategy and the Regional Transportation Improvement Program, as well as administration of Transportation Development Act requirements with respect to public transit in Santa Barbara County. SBCAG is also responsible, in cooperation with local and State agencies, to identify and resolve traffic congestion problems as specified by law. SBCAG2

The Airport Master Plan is a key document that will guide overall development of Santa Barbara Airport for the next 15 to 20 years. It also contains vital planning assumptions for our Airport Land Use Compatibility Plan (ALUCP), which we are currently in the process of updating. SBCAG acknowledges the vital project sponsorship that Airport has provided for the ALUCP update and we look forward to working with you on the project moving forward. SBCAG3

SBCAG offers the following comments on the draft EIR:

- **Impact T-3.** The DEIR recognizes that the draft Master Plan would contribute to Class I regional (cumulative) impacts to three Fairview Avenue intersections (Calle Real, U.S. 101 SB ramps and Hollister Avenue), as well as to the intersection of Kellogg Avenue and Hollister Avenue. SBCAG4

Member Agencies
Buellton • Carpinteria • Goleta • Guadalupe • Lompoc • Santa Barbara • Santa Maria • Solvang • Santa Barbara County

The City of Santa Barbara is required to identify feasible mitigation for these impacts, which could include, for example, the completion of the Ekwill-Fowler Roads Extension Project. This project would construct a new section of Ekwill Street west of Route 217 that would extend between Fairview Avenue and Kellogg Avenue. The project would also extend Fowler Road eastward from its current terminus at Fairview Avenue to Kellogg Avenue. When completed, this regionally significant project would provide an alternative east-west travel route to Hollister Avenue through Old Town Goleta. SBCAG5

The Ekwill-Fowler Roads Extensions Project benefits the Airport by providing an alternative route for those accessing the Airport terminal to and from the east via U.S. 101 (south) or Hollister Avenue. The DEIR and supporting traffic study assume the completion of the Ekwill-Fowler extension as part of the 2022 and 2032 baseline conditions. The DEIR notes that approximately 5% of airport-generated trips (long-term: 323 average daily trips; 18 P.M. peak hour trips) will travel via Ekwill Road or Fowler Road to Kellogg Avenue once the extension project is built (see Appendix F, Figure 4-1).

Without the Ekwill-Fowler extension in place, these trips would need to traverse Fairview Avenue to access the Terminal area, which would exacerbate the cumulative congestion impacts on Fairview Avenue and the impacted intersections. Therefore, completion of this project, which is a priority for the region, would directly mitigate the Master Plan's contributions to these cumulative impacts. SBCAG6

Also, without the Ekwill-Fowler extension completed, the greater number of vehicle trips required to travel along Fairview would expose more vehicles and passengers to potential aircraft hazards from Runway 7-25 (since vehicles traveling along Fairview Avenue must cross the Runway Protection Zone perpendicular to the flight path, whereas vehicles on the proposed Ekwill-Fowler Road extension would travel parallel to the flight path at the edge of the Runway Protection Zone). Therefore, completion of the Ekwill-Fowler extension would also lessen potential aircraft hazards.

We appreciate the opportunity to comment on the DEIR. If you have any questions regarding this letter, please feel free to contact me at 961-8910 or via e-mail at pimhof@sbcag.org.

Sincerely,

Peter Imhof
Deputy Executive Director, Planning

cc: File (CP 3-04-20)
Hazel Johns, Airport Director, Santa Barbara Airport

Response to Letter 3
Santa Barbara County Association of Governments (SBCAG)
Dated October 19, 2015

SBCAG-1: This comment establishes SBCAG as the Airport Land Use Commission for Santa Barbara County and documents that the City referred the draft Airport Master Plan to SBCAG for a land use consistency review.

Response: Comment noted.

SBCAG-2: This comment establishes SBCAG as the County's Metropolitan Planning Organization, Regional Transportation Planning Agency, and Congestion Management Agency. In these roles, SBCAG is responsible for identifying and resolving traffic congestion problems per State law.

Response: Comment noted.

SBCAG-3: This comment identifies the relationship between the proposed Airport Master Plan and the County's Airport Land Use Compatibility Plan, which SBCAG is in the process of updating.

Response: Comment noted.

SBCAG-4: This comment states that the Draft EIR found that the draft Master Plan would contribute to Class I cumulative impacts to three Fairview Avenue intersections (Calle Real, U.S. 101 southbound ramps, and Hollister Avenue) as well as to the intersection of Kellogg Avenue and Hollister Avenue.

Response: As discussed in the Draft EIR under Result T-2 (page 4-121) and Result T-3 (page 4-124), no project-related trips would go through the South Fairview Avenue and Calle Real intersection and, therefore, significant cumulative impacts to this intersection are Class III, Less than Significant Impact. (The remainder of this comment with respect to the other three referenced intersections is accurate.)

A revised Traffic Impact Study has been included in the Recirculated Draft EIR (Appendix D), which re-analyzed project-specific and cumulative traffic impacts using City of Goleta methodology (i.e., Traffix traffic analysis software) and SBCAG conventions. Based on this analysis, implementation of the Master Plan will contribute trips through two intersections expected to operate at

unacceptable levels of service in the future (South Fairview Avenue/US 101 NB ramps [year 2032 only] and Kellogg Avenue and Hollister Avenue [years 2022 and 2032]).

SBCAG-5: This comment states that the City is required to identify feasible mitigation, and notes that the Ekwill-Fowler Roads Extension Project would provide an alternative east-west travel route to Hollister Avenue.

Response: Comment noted. The Recirculated Draft EIR and revised Traffic Impact Study identifies feasible mitigation (see Section 4.8.7 and Table 4U).

SBCAG-6: This comment further discusses the benefits of the Ekwill-Fowler Roads Extension Project.

Response: Comment noted. The revised Traffic Impact Study includes the future extension of Ekwill Road in the years 2022 and 2032 as a planned intersection improvement. The extension of Fowler Road is not included as its proposed location within a runway protection zone makes it less feasible.

Gordon A. Feingold

PO Box 6163
Santa Barbara, CA 93160
gaf@sysdyn.com

October 27, 2015

Planning Division
Attn: Andrew Bermond, AICP
City of Santa Barbara
PO Box 1990
Santa Barbara, CA 93102-1990

GF1 is in Airport Commmission Minutes

Re: Airport Master Plan EIR

To the Santa Barbara Planning Commission and City Council:

I am writing to voice my strong support for the proposed Airport Master Plan. I believe the proposed Plan is consistent with the City's General and other plans, current regional plans, and SBCAG's existing Airport Land Use Plan (and likely the future Airport Land Use Compatibility Plan) and I urge its adoption and commencement of the construction and mitigation projects. GF2

Santa Barbara Airport's general aviation facilities have long been in need of considerable improvement, and lag behind airports at other similar municipalities. Santa Barbara's tourism-based economy depends on accessibility, and our inadequate general aviation airport facilities limit our ability to welcome new visitors to our area. GF3

Currently there is a dearth of hangars suitable for accommodating the needs of our residents and visitors. Our fixed base operators cannot adequately provide the services and facilities required because they have no space in which to build hangars and provide ramp space for aircraft. There has been essentially no change in available general aviation facilities for over 40 years with the single exception of the T-hangar project completed in 2007. GF4

In addition to providing adequate facilities, the safety aspects of the plan are important. The Master Plan summary states: GF5

> … the consolidation of all general aviation uses to the north side of the Airport is one of the primary aspects of the proposed plan and has significant future safety and efficiency ramifications for the Airport.

A key aspect of the safety benefit is the extension of taxiway H westward to the approach end of Runway 07. This will eliminate the necessity of crossing aircraft over runway 07 while taxiing for takeoff on that runway. GF6

It must be kept in mind that runway 07 is the runway in use when low visibility weather conditions are present at the airport. Visibility can be so low that pilots and controllers have difficulty seeing the runway and its crossing taxiways, thus operations that require additional taxiing to cross the runway significantly increase the chance for a runway incursion and an accident. Without taxiway H, the number of runway crossings will significantly increase, since general aviation activities will all be on the north side of the airport. The taxiway H extension will virtually eliminate the danger and it should be done, with the proposed slough impact mitigations adopted. GF7

May I remind everyone of the lives that were saved when the runway was shifted 800 feet west several years ago, under the Runway Safety Area Project for Runway 7-25. There were some who objected to the project, which, like this one, required mitigation for effects on the slough. Literally weeks after the extension project filled in the ditch in the slough, a jet aircraft overran the runway to the west and came to rest safely in the new overrun area. These people would have been killed had the extension not been done (and the aircraft would no doubt have spilled jet fuel into the slough). GF8

The proposed extension of taxiway H offers the same kind of lifesaving potential, as well as decreasing the likelihood of a fuel spill into the slough in the event of an accident. As the Plan states:

> Although removing the Taxiway H and related projects from the proposed Master Plan would reduce environmental impacts, it would continue unsafe and inefficient airfield circulation patterns at the Airport that create safety hazards to aircraft using the runway and taxiway system. If a full-length parallel taxiway north of Runway 7-25 is not provided, aircraft utilizing the north general aviation ramps would continue to cross the active primary runway to get to the Runway 7 threshold. This situation has been identified by FAA as a safety "hot spot." GF9

Let's not let that "hot spot" turn into a "death zone." Let's extend taxiway H.

Regarding the preservation of all three World War II Hangars Nos. 1, 2, and 3 (buildings Nos. 309, 317 and 267, respectively), I support the preservation of one of these hangars, but not all three, as this significantly reduces the area available for much-needed new aviation facilities and for future expansion. Certainly the historical value can be preserved by saving only one of these hangars, because they are virtually identical in form and historical significance. Keeping the other two is redundant and wasteful. GF10

When I recently visited the Oregon Historical Society Museum in Portland Oregon, they had a restored covered wagon on display, from the pioneer days. It was cool. However, they did not have three of them side by side, nor would this have added any value to the exhibit.

As stated in the EIR (NRHP Criterion A through D), "However, given the large number of properties associated with World War II and with the training of troops, not every associated property is necessarily historically significant." I agree, and we only need to preserve one of these hangars.

GF10 (cont'd)

Regarding the preservation of Buildings 248 and 249 (colloquially known as the "boneyard" hangars), I believe this is a waste of time and money. As Rick Harrison says on the TV show Pawn Stars, "Just because something is old doesn't make it valuable. Sometimes old things are just old." No one will miss these dilapidated old structures except the termites that are holding them together, and in 41 years at the airport I have never heard of anyone expressing the slightest interest in viewing them for historical purposes. "Mothball" them in place if you must, but the cost of actually relocating them (!) is significant and unnecessary. They have had a tortured life; Put them out of their misery. I recommend Table 4H Option 4: the "Document and Demolish Option."

GF11

In closing, and having reviewed the EIR, I again express my support for the proposed Airport Master Plan and ask you to do so as well.

GF12

Respectfully



Gordon A. Feingold
48 year Santa Barbara resident

Response to Letter 4
Gordon Feingold (GF)
Dated October 27, 2015

GF-1: See Airport Commission minutes (September 16, 2015) for Mr. Feingold's first comment.

GF-2: Commenter is voicing his support for the proposed project and states his belief that the proposed Airport Master Plan is consistent with other local and regional planning documents.

Response: Comment noted.

GF-3: Comment states that the Airport's general aviation facilities need considerable improvement.

Response: Comment noted.

GF-4: Comment states that the Airport needs more hangars and that the lack of hangars hampers the ability of fixed based operators to provide adequate services.

Response: Comment noted.

GF-5: Comment states that the safety aspects of the proposed Airport Master Plan are also important.

Response: Comment noted.

GF-6: Comment identifies the extension of Taxiway H westward to the approach end of Runway 7 as a key aspect of the safety benefits of the proposed project.

Response: Comment noted.

GF-7: Comment discusses the safety issues that currently exist when operations require taxiing across Runway 07, especially during low visibility weather conditions. The comment also points out that if general aviation activities are relocated to the north side of the Airport, additional runway crossings will occur if the Taxiway H extension is not also constructed.

Response: Comment noted.

GF-8: Comment describes a previous incident that occurred after Runway 7-25 was shifted 800 feet to the west involving a pilot that overran the runway, but was able to avoid potential fatalities and the spillage of jet fuel into the Slough by using the new overrun successfully.

Response: Comment noted.

GF-9: Comment restates the commenter's support of the proposed project, especially the extension of Taxiway H.

Response: Comment noted.

GF-10: Comment states the commenter r's support for preserving one of the Airport's World War II hangars, rather than preserving all three, which the commenter views as redundant and resulting in a significant reduction in the area available for needed aviation facilities and future expansion.

Response: Comment noted.

GF-11: Comment states the commenter's opposition to the preservation of Building Nos. 248 and 249, and his preference for documenting their historic characteristics and then demolishing them, or, at the most, mothballing them in place.

Response: Comment noted.

GF-12: Comment restates the commenter's support for the proposed project.

Response: Comment noted.

Our Vision Clean Air

Santa Barbara County
Air Pollution Control District

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CITY OF SANTA BARBARA
PLANNING DIVISION

October 28, 2015

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

Re: APCD Comments on the Draft Environmental Impact Report for the Santa Barbara Airport Master Plan (MST2013-00453), SCH# 201406096

Dear Mr. Bermond:

The Air Pollution Control District (APCD) has reviewed the Draft Environmental Impact Report (EIR) for the referenced project. The Santa Barbara Airport Master Plan provides guidance for the Airport's overall development for the next 15-120 years based on Federal Aviation Administration (FAA)-approved forecasts of aviation activity at the Santa Barbara Airport and provides development scenarios for the short term (2017), intermediate term (2022) and long term (2032). These development scenarios are not only reflective of the level of activity forecast to occur at the Airport, but are dependent on federal funding cycles and the availability of grant money for aviation projects. The proposed Airport changes in the Master Plan consist of:

1. Airfield Recommendations: Extension of Taxiway H to the west, parallel to the main instrument runway, restriping of existing paved areas, paving light lanes along taxiway edges, relocating entrances and exits from the taxiway system to comply with Federal Aviation Administration (FAA) recommendations.
2. North Landslide Recommendations: Consolidation of general aviation operations to facilitate two Fixed Base Operator (FBO) lease areas on the northeast portion of the airfield to provide tenant and visiting private aircraft services and facilities, and support facility changes including relocation of the Airport Maintenance Yard.
3. Terminal Area Recommendations: Construction of a new Long Term Parking Lot south of the Airline Terminal to accommodate 1,315 new or relocated parking spaces, expansion of the Airline Terminal, and relocation of the south-side FBO.

The Santa Barbara Airport is located on 948-acres adjacent to the City of Goleta and the University of California, Santa Barbara, and eight miles to the west of the downtown City of Santa Barbara area.

APCD1

Air Pollution Control District staff offers the following comments on the Draft EIR:

1. **Section 4.1 AIR QUALITY/GREENHOUSE GAS EMISSIONS, 4.1.1, Regulatory Setting, Federal, page 4-3:** Please clarify that $PM_{2.5}$ includes particulate matter of 2.5 micrometer or less in diameter.

APCD2

2. **Section 4.1 AIR QUALITY/GREENHOUSE GAS EMISSIONS, 4.1.2, Applicable Plans and Policies, Regional, page 4-4:** The 2010 Clean Air Plan (CAP) is referred to; however, please note that there is a more recently adopted CAP. The 2013 CAP was adopted in March 2015 and it can be viewed on our website at http://www.ourair.org/clean-air-plans/. Please update the document and analysis with the most recent 2013 CAP. APCD3

3. **Section 4.1 AIR QUALITY/GREENHOUSE GAS EMISSIONS, 4.1.4, Project-Specific Impacts, Long-Term (Operational) Emissions, page 4-10:** It is stated that *"Airport emissions for both ROC and NO_x would be below the APCD threshold of 25 pounds per day in both the short and long term build out scenarios."* Please specify that this APCD threshold applies to motor vehicle trips only. Please also include a discussion of the APCD threshold of emissions from all project sources (both stationary and mobile) of less than 240 pounds per day for reactive organic compounds (ROC) and NO_x, and 80 pounds per day for PM_{10}. APCD4

If you have any questions regarding these comments, please feel free to contact me at (805) 961-8893 or via email at NightingaleK@sbcapcd.org.

Sincerely,

Krista Nightingale,
Air Quality Specialist
Technology and Environmental Assessment Division

cc: TEA Chron File

Response to Letter 5
Santa Barbara County Air Pollution Control District (APCD)
Dated October 28, 2015

APCD-1: This comment summarizes the main changes to Airport facilities as recommended in the proposed Airport Master Plan.

Response: Comment noted.

APCD-2: This comment requests a clarification to the text of Section 4.1 AIR QUALITY/ GREENHOUSE GAS EMISSIONS, 4.1.1, Regulatory Setting - Federal to indicate that $PM_{2.5}$ includes particulate matter of 2.5 micrometer or less in diameter.

Response: This change to the text has been made in the Recirculated Draft EIR.

APCD-3: This comment requests a clarification to the text of Section 4.1 AIR QUALITY/ GREENHOUSE GAS EMISSIONS, 4.1.2, Applicable Plans and Policies - Regional to update the discussion and analysis to reflect the recently adopted 2013 Clean Air Plan (adopted in March 2015).

Response: This change to the text has been made in the Recirculated Draft EIR.

APCD-4: This comment requests a clarification to the text of Section 4.1 AIR QUALITY/ GREENHOUSE GAS EMISSIONS, 4.1.4, Project-Specific Impacts – Long-Term (Operational) Emissions to specify that the APCD threshold of 25 pounds per day applies to motor vehicle trips only and to include a discussion of the APCD threshold from all project sources of less than 240 pounds per day of reactive organic compounds (ROC) and NO_x, and 80 pounds per day for PM_{10}.

Response: This change to the text has been made in the Recirculated Draft EIR.

State of California – Natural Resources Agency
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

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PLANNING DIVISION

October 29, 2015

Andrew Bermond, AICP
City of Santa Barbara, Planning Division
P.O. Box 1990
Santa Barbara, CA 93102-1990
ABermond@SantaBarbaraCA.gov

Subject: Draft Program Environmental Impact Report for the Santa Barbara Airport Master Plan Project, SCH # 2014061096, Santa Barbara County

Dear Mr. Bermond:

The California Department of Fish and Wildlife (Department) received a Notice of Completion of a Draft Program Environmental Impact Report (DPEIR) from the City of Santa Barbara (City) for the subject Project pursuant to the California Environmental Quality Act (CEQA).

The proposed Project provides guidance for the Airport's overall development for the next 15-20 years, and includes:

- Taxiway extensions and improvements;
- Consolidation of general aviation operations and support facility changes, and;
- Construction of a new Long Term Parking Lot, expansion of the Airline Terminal, and relocation of the south side Fixed Base Operator.

The Master Plan relies on FAA-approved forecasts of aviation activity at the Airport and provides development scenarios for the short term (2017), intermediate term (2022), and long term (2032). If these growth assumptions are not fully realized, the phasing of recommended improvements would be adjusted to meet actual demand at the Airport.

The Santa Barbara Airport (Airport) is located on approximately 948 acres west of the City and adjacent to the City of Goleta and the University of California, Santa Barbara, in Santa Barbara County. The Airport is adjacent to and north and east of the Goleta Slough and the Department-designated Goleta Slough Ecological Reserve (GSER).

Proposed Project impacts include the removal of approximately 12.4 acres of annual brome grassland on the GSER for construction of Taxiway H. The annual brome grassland on-site is composed of non-native short to tall grasses and native and non-native broadleaf forbs. Potential impacts to biological resources from Taxiway H construction could include a loss of jurisdictional wetlands. Measures proposed in the DPEIR to mitigate the potential loss of wetlands include on-site wetlands restoration; this could result in additional acreage of habitat disturbance (up to 29.8 acres).

Wildlife with the potential to be impacted by the project include the Federal Endangered and California Species of Special Concern southern steelhead (*Oncorhynchus mykiss*) and tidewater goby (*Eucyclogobius newberryi*), the State Endangered Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), the State Fully Protected white-tailed kite (*Elanus caeruleus*), and 17 species of California Rare Plant Rank (CRPR) List 1B and locally rare plants.

CDFW1

Measures proposed in the DPEIR to mitigate impacts to biological resources include a programmatic wetland restoration plan and establishment of buffers (if feasible) and other best management practices prior to and during construction. According to the DPEIR, these measures all are subject to Department review and approval. CDFW1 cont'd

The following statements and comments have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386). These comments and recommendations are based on the requirement for the environmental document to include the following information:

- Identification of environmental impacts of the proposed Project (CEQA Guidelines, §§ 15063, 15065, 15126, 15126.2,15126.6 & 15358); and,
- A description of feasible mitigation measures to avoid potentially significant impacts, and/or mitigate significant impacts, of the proposed Project on the environment (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370).

CDFW2

In addition, the Department and the City manage and/or maintain the approximately 400 acre City-owned portion of the GSER; the Reserve is protected by the California Code of Regulations, under Title 14 Section 550. Changes in land use designation under Title 14 must be authorized through the California Fish and Game Commission. Allowable wildlife-dependent activities are described in Section 550; any other activity is prohibited (Title 14 CCR, § 550(g)).

Program EIR

The purpose of the DPEIR is to provide a programmatic assessment of the Airport's proposed Airport Master Plan (Master Plan) under the California Environmental Quality Act (CEQA). Future projects recommended in the Master Plan would require discretionary approvals at the time that they are ready for implementation. CEQA Guidelines §15168 describes the processes to apply for a program EIR. CEQA Guidelines §15168(c)(1) discusses the use of initial studies to guide the decision to prepare additional EIRs or negative declarations for activities which would have effects not examined in the DPEIR.

The DPEIR states that a full analysis of Project impacts on jurisdictional wetlands and indirect impacts on Carneros Creek and Goleta Slough cannot be undertaken until projects are actually proposed and project's construction details are known. At that time, a thorough evaluation of the project under CEQA would be required. All actions would be subject to future review by the City under CEQA; the Program EIR will be used to help determine the appropriate subsequent CEQA review. CDFW3

CEQA Guidelines §15168(c)(2) also states:

If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the

scope of the project covered by the program EIR, and no new environmental document would be required.

The Department therefore submits these comments with the assumption that no subsequent CEQA documents will be circulated for the Project, and that no future opportunity will be available for the Department to comment within the purview of the CEQA process. CDFW3 cont'd

Expansion of Infrastructure with Sea Level Rise

Much of the airport's current infrastructure is located in the existing Goleta Slough 100 year floodplain and lies on fill placed in the historic center of the Goleta Slough ecosystem, fundamentally altering the hydrology and aquatic wildlife habitat function of this important coastal ecosystem. Four streams converge in this low lying area. Runways lie at low elevations adjoining remnant slough wetland and upland transition areas. Runways are typically located at elevations between 10 and 15 feet mean sea level, with low points (Revell, et al. 2014). CDFW4

The DPEIR notes that the Santa Barbara General Plan Safety Element projects the Airport will experience increased flooding attributable to changing climate and sea level rise over the useful life of the projects proposed in the Master Plan. Preliminary analysis of vulnerabilities within the Goleta Slough area associated with sea level rise and climate change further confirms the likelihood of increased flooding and hydrologic shifts within the remaining low-lying slough and airport area (Revell, et. al. 2014). The Department is concerned that the Project proposes to install additional airport infrastructure and impervious surfaces over the next thirty years, further altering the hydrology of this vulnerable area.

The remaining slough ecosystem is confined by airport fill, existing topography and other surrounding infrastructure. This area will be experiencing continued adverse impacts from sea level rise, increased storm surges, extreme high tide events, more frequent and intense flooding, and shifting hydrologic and physical habitat conditions, which are expected to worsen over time (Revell, et al. 2014). Preliminary analysis indicates a likelihood of a substantial loss of Goleta Slough mid-marsh habitats. These habitats are utilized by an onsite population of Belding's savanna sparrow, and by many other species of plants and animals which utilize vegetated tidal and non-tidal salt marsh habitats (Revell, et. al. 2014). Much of this area will be converted to un-vegetated mud flats by the year 2100 if current trends continue (Revell, et al. 2014). This suggests little suitable habitat will remain to sustain a viable onsite Belding's savanna sparrow population. Similarly, the high-marsh zone which supports a rich diversity of species will be largely confined by infrastructure (Revell, et al. 2014). Unless the slough is able to recalibrate and readjust its location topographically in response to changing conditions, it is unlikely that it will continue to provide important wildlife habitat functions and values, or sustain viable populations of key wildlife species. CDFW5

Given these considerations, the Department recommends the environmental analysis include an alternative that would focus on an airport relocation strategy over the next thirty year planning window, and include a Goleta Slough restoration component that would allow for natural recalibration and habitat adjustments to take place. CDFW6

Removal of GSER lands

The DPEIR presents specific actions that would, over time, remove additional city-owned lands currently protected as the GSER and currently zoned under the Local Coastal Plan as Goleta CDFW7

Slough Reserve Zone (Reserve Zone). Removal of lands within this designated area and conversion to airport uses will further fragment and degrade the values for which GSER was established. With sea level rise continuing to threaten these remaining areas, loss of transitional and upland habitats within Goleta Slough will further confine the slough ecosystem, reduce flood refugia for wildlife, and limit the slough's ability to expand upslope and adjust to changing physical and hydrologic conditions. CDFW7 cont'd

The proposed Project would further reduce upland, transitional and remnant wetland habitat areas that: a) currently provide a variety of important functions within the protected slough ecosystem, and; b) are essential to reducing adverse effects on species and habitats stemming from sea level rise. Project components that would affect the GSER are therefore a concern to the Department and are potentially inconsistent with the Cooperative Agreement between the City and the Department (dated August 25, 1987). The Department requests that new project features proposed to be constructed on the GSER, including Taxiway H, be relocated to other areas or eliminated from the proposed Project. CDFW8

Taxiway H Feature

The DPEIR describes various components that could include removal of areas vegetated with annual grasses and remnant coastal wetlands and convert them to new features, including a taxiway for waiting airplanes (Taxiway H). The DPEIR indicates that removal of GSER lands for this taxiway and other proposed new features could be found consistent with the Local Coastal Plan (LCP) Condition 29.25.030, and describes this as a potential "incidental public service purpose" and a project necessary to "maintain existing infrastructure" (LCP 29.25.030.B). This is concerning to the Department. In addition to the loss of currently protected habitat that would occur if Taxiway H and other features are constructed in the GSER, additional infrastructure creates a need for more maintenance that ultimately further stresses habitats and species in Goleta Slough. CDFW9

The habitat area on existing GSER proposed for expansion of Taxiway H, for example, supports foraging habitat for the white-tailed kite and other wildlife species (Mark Holmgren, pers. comm.). Foraging habitats proximate to known white-tailed kite nesting sites (including one within the 400 acre Reserve Zone) are essential to the survival and reproduction of this declining raptor in the local and regional area. The Department would consider loss of foraging habitat proximate to known nests to be significant at the project level and add to cumulative habitat losses in the surrounding area.

Existing transitional and upland habitats within the Goleta Slough ecosystem are very important to sustaining slough functions and species diversity, and such areas also represent locations where some habitat shifts can occur as sea levels rise. Removal of such areas by implementation of the proposed Project leaves fewer options for sustaining species and habitat values for future generations as the LCP requires (LCP Chapter 29.25). CDFW10

Replacement of Perimeter Fencing and Wildlife Movement in the GSER

The proposed Project includes a component to replace the southern sections of the existing perimeter fencing surrounding the GSER and Airport area. Currently, most of the GSER is surrounded by chain-link fencing which forms a substantial barrier to wildlife movement into and out of the surrounding area. CDFW11

The Department recommends the proposed Project include a component to improve access for key wildlife species to move into and out of the GSER area. Provisions for providing additional passage by modifying the existing fencing at key points are necessary to achieve a better balance within an ecosystem that should support coyotes, gray foxes, and bobcats as key predators. Any new fencing should be constructed to provide for passage by these types of animals, and improve access between lands within the GSER owned by the Department and adjoining Airport-owned Reserve Zone (which is also GSER). CDFW11 cont'd

Mitigation Measures

The Project proposed on-site wetlands restoration of up to 29.8 acres of upland habitat to mitigate the potential loss of wetlands from Taxiway H construction amounts to conversion of uplands and additional loss of upland habitat. This is concerning to the Department, as explained above. Converting uplands to wetlands as a potential mitigation measure would not compensate for loss of existing, protected GSER, would not replace the functions and values of upland and transitional habitats, and would not replace foraging values for white-tailed kite and other species that would be lost. The Department therefore recommends a mitigation strategy to include a habitat compensation component to mitigate the loss of upland acreage in addition to wetland acreage, and associated wildlife resource function. CDFW12

The proposed Project identifies four areas where 29.8 acres of upland habitat would be converted to wetlands to mitigate the potential loss of wetlands. These areas currently support habitats that sustain small mammal food sources for white-tailed kite and other foraging raptors and predators. Area 4 is primarily vegetated by meadow barley (*Hordeum brachyantherum*), (Rincon, 2015), suggesting the area already supports a native grassland that would be considered potential environmentally sensitive habitat, and indicates it is already a state wetland (meadow barley is a facultative wetland indicator pursuant to Reed, 1988). This area is not identified as wetland on maps prepared for the PDEIR, (see PDEIR Exhibit 4c). The Department has observed the sensitive, annual plants Coulter's goldfields (*Lasthenia coulteri*) and southern tarplant (*Centromadia parryi* subsp. *australis*) on Area 2. Coulter's goldfields and southern tarplant both exhibit highly variable distributions and abundance. Other sensitive and declining wildlife resources are also likely to occur in these areas. The Department therefore does not support the proposed mitigation approach to grade these areas to a lower elevation, and convert them to wetlands. CDFW13

Impacts to Nesting Birds

The Department recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds CDFW14

occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

CDFW14 cont'd

Impacts to State-listed Species

The proposed Project would expand facilities on existing GSER and adjoining non-reserved lands and habitat areas. The proposed Project has the potential to result in take of Belding's savanna sparrows, which are year-round residents of the Goleta Slough and would be expected to be in and adjacent to areas proposed for additional facilities and restoration mitigation. Timing project activities and mitigation efforts to avoid the general bird nesting season cannot assure avoidance of Belding's savanna sparrow, and the Department does not believe the potential for take of Belding's savanna sparrow resulting from the proposed Project activities can be eliminated.

CDFW15

The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without full mitigation. As to CESA, take of any endangered, threatened, candidate species, or state-listed rare plant species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project, Project construction, maintenance, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

The Department finds the DPEIR to be lacking in its description of Project impacts and resultant mitigations regarding Belding's savannah sparrow. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

CDFW16

Impacts to Jurisdictional Drainages

The Department has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) or a river or stream or use material from a streambed, the Project applicant (or "entity") must provide written notification to the Department pursuant to Section 1602 of the

CDFW17

Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of an LSA Agreement is a project subject to CEQA. To facilitate issuance of a LSA Agreement, if necessary, the environmental document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA Agreement. The Department considers salt marsh wetlands to be a riparian resource, as salt marshes are hydrologically interconnected between stream channels and subsurface water tables. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. Again, the failure to include this analysis in the Project's environmental document could preclude the Department from relying on the Lead Agency's analysis to issue a LSA Agreement without the Department first conducting its own, separate Lead Agency subsequent or supplemental analysis for the Project.

CDFW17 cont'd

Some of the projects as proposed in the DPEIR may include impacts from construction to streambeds and wetlands within Department jurisdiction. Therefore, notification under Section 1600 et seq. will be required. A notification package may obtained online by visiting the Department's website at http://www.dfg.ca.gov/1600/1600.html. Our San Diego office may be called at (858) 636-3160 to initiate the 1600 process.

Proposed Alternatives

One alternative was described in the DPEIR, besides the No-Project Alternative. This alternative was described as the Environmentally Superior alternative and consisted of the proposed Project, minus the construction of the Taxiway H extension and related projects. Removing the Taxiway H component of the Project would address almost all of the Department's concerns regarding loss of upland habitat and associated negative impacts to wildlife resources within the GSER. It would also eliminate the need for mitigating the potential loss of wetlands and associated upland habitat conversion to wetlands. If the Project is built, the Department recommends the Environmentally Superior alternative become the approved project. This would substantially lessen impacts to biological resources.

CDFW18

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mary Meyer, Senior Environmental Scientist (Specialist) at (805) 640-8019 or Mary.Meyer@Wildlife.ca.gov, or Martin Potter, Senior Environmental Scientist (Specialist) at (805) 640-3677 or Martin.Potter@Wildlife.ca.gov.

Sincerely,

Edmund Pert
Regional Manager
South Coast Region

ec: Martin Potter, CDFW, Ojai
Christine Found-Jackson, CDFW, Glendale
Sarah Rains, CDFW, Agoura Hills
Mary Meyer, CDFW, Ojai
Rick Mayfield, CDFW, Camarillo
Roger Root, U.S. Fish and Wildlife Service, Ventura
Scott Morgan, State Clearinghouse, Sacramento

References

Reed, P.B., Jr. 1988. National list of plant species that occur in wetlands: California (Region 0). U.S. Fish Wildlife Service Biol. Rep. 88 (26.10) 135 pp.

Revell, Dave, Jeremy Lowe, Eddie Divita, and Dave Hubbard, January 30, 2014. Powerpoint Presentation: Ecosystem management plan update and draft vulnerability results for sea level rise on the resources of the Goleta Slough, Goleta Slough Area Sea Level Rise and Management Plan. 88 pp.

Rincon Consultants Inc., 2015. Biological Assessment for Goleta Slough Mouth Management. City of Santa Barbara Airport Department, Santa Barbara CA. 80 pp.

Response to Letter 6
State of California – Natural Resources Agency, Department of Fish and Wildlife (CDFW)
Dated October 29, 2015

CDFW-1: This comment provides a summary of the Draft EIR as it pertains to the proposed project and its impacts to biological resources.

Response: Thank you for your comment. Special-status species with potential to occur at the Airport are listed within the Draft EIR in Tables 4C and 4D.

CDFW-2: This comment identifies the CDFW's authority as a Responsible Agency under the *California Environmental Quality Act* and Fish and Game Code, and as a Trustee Agency with jurisdiction over the Goleta Slough.

Response: The City of Santa Barbara recognizes the California Department of Fish and Wildlife (CDFW) as a Responsible Agency under CEQA Guidelines §15386 as a Trustee Agency of resources in the Goleta Slough Ecological Reserve (GSER). Section 4.7.7 of the Recirculated Draft EIR has been updated to include mitigation measure LU/mm-3:

- **LU/mm-3: The City of Santa Barbara and the CDFW shall amend the Cooperative Agreement dated August 25, 1987 (as revised) for the maintenance and management of the Goleta Slough to adjust the boundaries of the GSER to exclude the Taxiway H Airfield Safety Project site and to include a site of similar habitat value at an area ratio of 1:1 (i.e., if Taxiway H and associated actions removes 11 acres from the GSER, 11 acres would be added to the GSER from available Airport property adjacent to the Slough). This mutually-accepted exchange shall be in addition to required biological mitigation. The Cooperative Agreement amendment shall be presented to the California Fish and Game Commission.**

CDFW-3: This comment discusses the CDFW's understanding of the Draft EIR as a programmatic document.

Response: Comments noted. However, the Draft EIR states in several places, including the Executive Summary (ES3.0, Required Discretionary Actions and Other Agency Approvals), that "Future projects recommended in the Master Plan would require discretionary approvals at the time they are ready for implementation." For the proposed Taxiway H Airfield Safety Project, this process specifically includes the application of a Coastal Development Permit, a rezone of the G-S-R, a General Plan amendment, and an LCP policy amendment, all of which will require

coordination with the CDFW. See LU/mm-3, which has been added to the Revised Draft EIR, in response to comment **CDFW-2** above.

CDFW-4: This comment notes that much of the Airport's current infrastructure is located within the historic Goleta Slough and within the existing 100-year floodplain.

Response: Comment noted.

CDFW-5: This comment discusses future impacts related to sea level rise within the Airport and Goleta Slough ecosystem.

Response: Comment noted. While adverse effects of sea level rise on the Goleta Slough are anticipated to be significant, they are not the result of Master Plan implementation and would occur under the No Project Alternative. The ability of habitat to migrate into the airfield is low given Federal Aviation Administration (FAA) requirements to maintain smooth, graded Runway and Taxiway Safety Areas within 500 feet of the Runway 7-25 centerline. Neither the proposed project nor any of the alternatives would alter FAA safety requirements or runway geometry. Mitigation Measure BIO/mm-1 in Section 4.2.7 of the Recirculated Draft EIR has been amended to include adaptive restoration as a requirement of the Programmatic Wetland Restoration Plan (PWRP) consistent with the recommendations of the *Goleta Slough Area Sea Level Rise and Management Plan*.

CDFW-6: This comment recommends that the Draft EIR include an alternative that focuses on an airport relocation strategy with a Goleta Slough restoration component.

Response: Proposals to relocate the Santa Barbara Airport are outside of the scope of the Master Plan. CEQA Guidelines §15126.6 states that an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. Please see Section 3.4 of the Draft EIR.

CDFW-7: This comment discusses changes to the Goleta Slough Reserve zone (G-S-R) as a result of the Airport Master Plan.

Response: As discussed in response to comment **CDFW-2**, the Recirculated Draft EIR includes an additional mitigation measure related to the need for a rezone of the G-S-R in conjunction with a General Plan amendment, as well as an LCP amendment.

CDFW-8: This comments states that the removal of G-S-R zoned lands would reduce upland, transitional, and remnant wetland habitat and request that the Taxiway H Airfield Safety Project or others be relocated to other areas or eliminated from the proposed project.

Response: As mentioned in response to comment **CDFW-5**, Master Plan development has been focused in areas currently disturbed by routine maintenance of runway and taxiway safety areas consistent with FAA requirements and the Airport's Wildlife Hazard Management Plan (WHMP). Because of this disturbance it is unlikely to present significant habitat value. Mitigation measure BIO/mm-1 in Section 4.2.7 of the Recirculated Draft EIR has been amended to include adaptive restoration as a requirement of the PWRP consistent with the recommendations of the *Goleta Slough Area Sea Level Rise and Management Plan*.

CDFW-9: This comment describes concerns regarding the recommended Taxiway H Airfield Safety Project.

Response: The Taxiway H Airfield Safety Project site is in the Airport Approach and Operations zone and the Goleta Slough Reserve zone (A-A-O/G-S-R) in both the Airport Zoning Ordinance (Santa Barbara Municipal Code [SBMC] Title 29) and the Airport and Goleta Slough LCP. Taxiways are an expressly allowed use in the A-A-O, and incidental airfield infrastructure is allowable and may be installed in the G-S-R. The discussion in the Recirculated Draft EIR (Impact LU-6) has been revised to state that the LCP and Airport Zoning Ordinance shall be amended to change the A-A-O/G-S-R zone designation to A-A-O. Maintenance of airfield infrastructure would marginally increase following Taxiway H construction, though routine grading and mowing would be reduced while rehabilitation of taxiway pavement would continue to occur over an approximate 20-year interval, however on a marginally increased scale. Existing Taxiway H was rehabilitated in 2014.

CDFW-10: This comment discusses concerns related to foraging of white-tailed kite and other wildlife species if Taxiway H Airfield Safety Project is constructed.

Response: While the Airport acknowledges the use of Goleta Slough by white-tailed kites, the Draft EIR assumes implementation of the Airport's adopted WHMP, which requires hazing of bird species within the runway and taxiway safety areas. It is unreasonable to consider the proposed Taxiway H project site as suitable foraging habitat because wildlife in this area are hazed by Airport Operations and Patrol Divisions as part of their routine duties in compliance with the FAA Manual "Wildlife Hazard Management at Airports" dated July 2005. Section 4.2.1, *Wildlife Hazards* of the Recirculated Draft EIR has been amended to include reference to these requirements.

CDFW-11: This comment recommends that the proposed project include a component to improve access for key wildlife species to move into and out of the Goleta Slough through modification of the existing airport perimeter fence.

Response: Comment noted. However, the proposed replacement of perimeter fencing has been removed from the project description following consultation with staff of the CDFW and the Transportation Security Administration (TSA).

CDFW-12: This comment recommends a mitigation strategy that includes a habitat compensation component for the loss of upland acreage in addition to wetland acreage, and associated wildlife resource function.

Response: The PWRP would provide mitigation for any wetland loss associated with Master Plan implementation. Impacts to upland habitat would be replaced at a 1:1 ratio in a form and location acceptable to the Goleta Slough Management Committee. Please see revised mitigation measure BIO/mm-1 in Section 4.2.7 of the Recirculated Draft EIR.

CDFW-13: This comment states that the CDFW does not support grading of Mitigation Areas 2 or 4 as shown in the Draft EIR, Exhibit 4C.

Response: Comment noted. The restoration of Areas 2 and 4 would not include grading to lower the entire site to become tidal wetland habitat. However, as discussed in response to comment **CDFW-5**, any restoration of these sites would be designed to become tidal wetland habitat with anticipated sea level rise.

CDFW-14: This comment states that measures to avoid impact to nesting birds should be included in the Draft EIR.

Response: Comment noted. The Recirculated Draft EIR includes the following mitigation measure in Section 4.2.7:

- **BIO/mm-3: No construction shall occur during the avian breeding season (February 1-September 1) unless a survey from qualified biologist with experience in conducting breeding bird surveys finds that no bird breeding habitat exists within 300 feet of the disturbance area (500 feet for raptors) or can state with certainty that such habitat does not contain nesting birds. Project personnel, including contractors working on the site, shall be instructed on the sensitivity of the area. Reductions in nest buffer distance may be approved by the City's Community Development Department depending on the avian species involved, ambient levels of human activity, screening vegetation, or other factors.**

CDFW-15: This comment provides comments related to impacts to Belding's savanna sparrows.

Response: Comment noted. The proposed construction sites are currently graded and mowed to maintain a vegetation height not to exceed eight inches per the requirements of the WHMP (see response to comment **CDFW-10**). No suitable Belding's savannah sparrow habitat was identified within the runway and taxiway safety areas in the Zembal et al. survey "A Survey of the Belding's Savannah Sparrow" (2010) with field work conducted by Mark Holmgren. However there remains a possibility of Belding's savannah sparrow use of the Taxiway H project site as well as any of the proposed restoration areas. Therefore, the Recirculated Draft EIR includes the following mitigation measure in Section 4.2.7:

- **BIO/mm-4: Taxiway H Airfield Safety Project and its habitat restoration project sites shall be monitored by a qualified biologist for Belding's savannah sparrow. Prior to site preparation and construction activities, the Airport shall have a qualified biologist survey all breeding/nesting habitat within the project site every seven days for eight consecutive weeks. Documentation of findings, including negative findings, shall be submitted to the CDFW. Site preparation and construction activities will only begin if no breeding/nesting birds are observed and concurrence has been received from CDFW. If breeding activities or an active nest is located in a work area, site preparation and construction activities shall not begin in that area until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and the young will no longer be impacted by the project.**

  Once site preparation and construction activities have commenced, the project site shall be monitored for Belding's savannah sparrow on a weekly basis. Documentation of findings, including negative findings, shall be submitted to CDFW until construction is complete.

  Site preparation or construction activities shall be suspended immediately in a given area if the qualified biologist determines that breeding or nesting activity is occurring in that area. Site preparation and construction activities shall not resume until the monitor determines that the breeding and nesting activities described above have stopped.

  Noise levels will be monitored by a qualified biologist to determine if construction activities are disruptive to Belding's savannah sparrow in or adjacent to the project site. If a significant disruption to foraging behavior is observed, construction activities in the area of disturbance will be stopped immediately until the qualified biologist develops recommendations to reduce or eliminate the disturbances and receives concurrence from CDFW.

CDFW-16: This comment identifies the potential need for future take permits related to specific Airport Master Plan projects.

Response: Comment noted. See response to comment **CDFW-15**. With incorporation of mitigation measure BIO/mm-4, there would be no need for an Incidental Take Permit.

CDFW-17: This comment provides information regarding the potential need for a Lake and Streambed Alteration (LSA) agreement with the CDFW.

Response: Comment noted. Although no wetland impacts have been identified in the Draft EIR, it is possible that wetlands could be identified and a Lake or Streambed Alteration (LSA) Agreement could be necessary. While this was identified in EIR Section 4.2.1, mitigation measure BIO/mm-1 in Section 4.2.7 of the Recirculated Draft EIR has been revised to explicitly state the possible need for securing an LSA Agreement.

CDFW-18: This comment states that the Environmentally Superior alternative, as presented in the Draft EIR, would address almost all of the CDFW's concerns.

Response: Comment noted.

Bermond, Andrew

From: Carl L Hopkins <CarlLHopkins@cox.net>
Sent: Friday, October 30, 2015 9:51 PM
To: Bermond, Andrew
Subject: Comments on the SBA master plan

Mr. Bermond,

I would like to make the following comments on the Master plan EIR.

As you know I was very actively involved, along with 24 other people representing many interests, in the development of the master plan. Although I was chosen to represent the interests of light general aviation, I also recognize that all the many aspects of the airport are critical to its operations.

As I remember, the only guiding direction at the start of the process was that the area South of runway 25 would be for commercial airlines while the area North of runway 25 would be for General aviation. As the processes worked its way through the details the plan evolved to move light General Aviation to the North West part of the field and heavy General Aviation to the North East part of the field. I thought then and continue to think this was a very good plan. CSH1

The master plan included the removal of all five of the World War II hangers. The removal of hanger 1 was critical to creating space for the three flight schools and all their planes, for a small plane wash rack and a small plane self-maintenance facility, and for parking spaces for 46 transient light GA planes. The EIR later designated Hanger 1 as a "possible" structure of merit. As I understand the current plan, the airport proposes to modify the master plan to leave this hanger in the middle of the light GA area. I believe this is a wrong decision. If that hanger is left in place, it will not ever be possible to achieve the goals set out in the master plan for the light GA area. There is simply not enough room to support 2 or 3 flight schools, all their planes and the transient parking, let alone the wash rack and maintenance facility. The airport should go to City Council and request whatever is needed in order to allow the airport to remove that hanger. It is not useable at this airport at this time and is a major impediment to the implementation of this part of the master plan. CSH2

On the heavy GA side, the goal of the master plan was to produce two equal (or close to equal) sites for two future FBOs to build. We did not want one FBO site to be significantly better than the other. We felt that two equal sites would produce the highest bids and the best possible service. The plan therefore called for the removal of Hanger 3. CSH3 (It also called for the removal the restaurant with a new restaurant to be build where the current administration building is. But with the loss of the E-Bar and subsequent lease the restaurant will stay where it is "forever". This already puts a "hole" CSH4 in one of the two FBO sites which degrades it somewhat.) Leaving hanger 3, which will be of little or no use to the FBO who will likely not even want to bid on it, will produce another hole in the same FBO site. These two holes will make this site significantly less valuable than the more Easterly site. The result will be reduced revenue for the airport for the next 20 plus years. Again, the airport should ask City Council for permission to remove Hanger 3. CSH5

Hanger 2 was slated for removal in order to gain improved access to additional T hangers the airport envisioned building West of the existing 24 airport T-Hangers. As a compromise with those who would like to keep these hangers, I suggest we keep this hanger. I don't know who will use it and I suspect the maintenance costs will outweigh any possible revenue from it, but sometimes that is what comes of a compromise. There are two reasons I can support this hanger as the one to be kept. First looking at the estimate cost to build the proposed T-Hangers makes me believe they will never be built. When the master planning committee looked at the plan they looked like a good idea. But when you take a look at the costs associated with them the airport could never be able to rent them for even a 30 year break even cost. And if for some reason those costs came way down, I believe access could still be gains without removal of hanger 2. It might not be as good of access, but it could be made to work. CSH6

The airport has shown no concern with going to City Council with the extension of taxiway Hotel knowing that it invades wetlands and will have to have significant remediation. The airport should go to Council with the same degree of effort to remove Hangers 1 and 3 for the reasons stated above. I believe I speak for a large number of pilots who support this proposal. A lot of worked very long and hard, with lots of public meetings, to produce a well rounder, long term master plan. I think all of us would be very disappointed to see that plan significantly impacted by the decision of a consultant that these hangers "might be possible structures of merit". This is a functioning airport, not a museum. One hanger, combined with all the other memorials to our proud World War II heritage should be enough. CSH7 CSH8

Sincerely…… Carl Hopkins

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Response to Letter 7
Carl and Susan Hopkins (CSH)
Dated October 30, 2015

CSH-1: This comment summarizes the commenter's participation in the Airport Master Plan's planning advisory committee and the direction that was given and that evolved throughout the planning process.

Response: Comment noted.

CSH-2: This comment mentions earlier iterations of the Airport Master Plan's recommended development concept, which included the demolition of five existing World War II hangars. The comment states that the EIR later designated Hangar 1 as a "possible" structure of merit and that, as a result, the Airport Master Plan now proposes to leave Hangar 1 in the middle of the light general aviation area. The commenter opposes this recommendation.

Response: Comment noted. The Draft EIR does not actually "designate" any structures as structures of merit or possible structures of merit since that action is within the purview of the City of Santa Barbara's Historic Landmarks Commission (HLC) under the authority of the City's Historic Structures Ordinance (Chapter 22.22 of the Municipal Code). The Draft EIR did use established criteria and significance guidelines to assess the structure's potential for listing by the HLC as a structure of merit and found that the hangar in question appears to be eligible for listing.

CSH-3: This comment mentions earlier iterations of the Airport Master Plan's recommended development concept, which included the removal of World War II Hangar 3 to create two future fixed base operator sites of equal (or close to equal) area.

Response: Comment noted.

CSH-4: This comment discusses the likelihood (in the opinion of the commenter) of the existing restaurant building (formerly, the Elephant Bar) to remain in its current location rather than being relocated to the current administration building site in conjunction with a potential conference center, which was also included in earlier iterations of the Airport Master Plan's recommended development concept.

Response: Comment noted. This conclusion is correct. The lease of the former Elephant Bar restaurant to a new restaurant operator has occurred; therefore, the current recommended development concept for the Airport Master Plan does not include the existing restaurant

property nor is a new restaurant/conference center incorporated into the north side of the Airport.

CSH-5: This comment contains the commenter's opinion that World War II Hangar 3 should be removed to make room for future fixed base operator activities on the Airport's north side.

Response: Comment noted. However, the commenter is incorrect in the statement that both the existing restaurant property and Hangar 3 are located in the same future fixed base operator parcel. Actually, they are located in different parcels, which keeps the overall acreage between the two future sites approximately the same, i.e., 22.6 and 22.4 acres.

CSH-6: This comment expresses the opinion that, if a World War II hangar is going to be retained, Hangar 2 is the most advantageous building to keep.

Response: Comment noted.

CSH-7: This comment states that the Airport is not concerned with asking the City Council to allow the extension of Taxiway H even though it will require mitigation for impacts to wetlands.

Response: Comment noted. The Airport believes that the safety aspects of extending Taxiway H warrant its consideration even if biological resources are disturbed and mitigation is necessary.

CSH-8: This comment reiterates the position that some of the hangars that are eligible for listing by the City as structures of merit should be removed to make room for future north side general aviation uses.

Response: Comment noted.

CITY OF GOLETA

CITY COUNCIL

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Councilmember

CITY MANAGER
Michelle Greene

October 30, 2015

SENT VIA EMAIL
ABermond@SantaBarbaraCA.gov

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

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

Dear Mr. Bermond:

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

1. Scope of the Project

An accurate project description is necessary to determine the scope of environmental review under CEQA. The proposed project boundary is unclear, undefined, and is not sufficiently detailed or mapped to allow for adequate environmental analysis. While the DEIR analysis focuses on development within the Airport boundary south of Hollister Avenue, the project description includes removal of the long term parking lot north of Hollister Avenue and avigation easements to the north and south of the airport. GOL1

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

The DEIR's project description fails to include the corresponding amendments to the 1997 Santa Barbara Airport Industrial Area Specific Plan (Specific Plan). The Specific Plan guides development both North and South of Hollister Avenue and includes some but not all of the Santa Barbara Airport. The DEIR project description (and proposed Master Plan) alters growth within the Specific Plan boundary and would be inconsistent with the Specific Plan without a corresponding Specific Plan amendment. The DEIR project description must disclose the conflict between the proposed Master Plan and the adopted 1997 Specific Plan and include the content of the Specific Plan amendment(s) that is required to achieve consistency. The DEIR must fully analyze the impacts associated with the Specific Plan amendments that are required for project description consistency with an existing, adopted plan. GOL2 GOL3

3. Inconsistency between Project Description and Impact Analysis

The DEIR project description identifies future airport growth, such as increased enplanements, that are not evaluated in the environmental analysis. The impacts of these increase enplanements must be considered in the impacts analysis as the proposed project and increased enplanements are connected. The DEIR project description includes improvements that are intended to satisfy aviation demand but also serves to support future aviation demand. Examples of these improvements include relocated and enlarged Fixed-Base Operations facilities, increased and more convenient parking options, and the expansion of terminal facilities. As such, full environmental analysis of all future airport growth, including increased enplanements and related vehicle traffic, must be evaluated in the DEIR. GOL4

4. Inadequate Transportation Analysis

As detailed in the comments in the attached table, the DEIR inadequately analyzes transportation impacts associated with the proposed project. These comments are intended to support a more thorough evaluation of the trip generation as a result of the proposed project, related impact evaluation, and mitigation. GOL5

5. Inadequate Biological Resources Analysis

The extension of Runway H is located within sensitive wetland habitat. The DEIR incorrectly classifies the loss to wetland habitat as Class II. Instead, this must be identified as a Class I impacts to reflect loss of protected habitat. Additionally, the existing setting includes updated habitat boundaries. We have concern regarding the timing of the habitat surveys conducted as part of the DEIR as the single survey occurred during the dry season in drought conditions. GOL6 GOL7

DEIR Impact BIO-1 should not simply be limited to jurisdictional wetlands. All wetlands, habitat, and unique Goleta Slough biological resources must also be considered in this impact or in another new impact. GOL8

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The DEIR heavily relies on the Programmatic Wetland Restoration Plan (PWRP) to mitigate the destruction of wetlands. Without including the PWRP for review, there is no justification for the assumption that this mitigation can reduce Impact BIO-1 to less than a Class I impact. The PWRP should be included with the DEIR to better understand the mitigation envisioned. However, even if the PWRP is produced so as not to constitute a deferred mitigation, this document cannot mitigate the destruction of wetlands and biological resources to any less than a Class I impact. GOL9 GOL10

5. Inadequate Alternatives Analysis

An EIR must present a reasonable range of alternatives that could feasibly attain most of the project's objectives but avoid or substantially lessen the proposed project's significant effects (CEQA Guidelines § 15126.6(a). Analyzing only one single alternative is inadequate. Additional alternatives need to be analyzed. GOL11

The DEIR provides an insufficient range of alternatives for a reasonable discussion and consideration of other Draft Master Plan concepts that could attain some or all of the project objectives. The only alternative outside of the no-project includes only a slight deviation from the project description. This alternative is insufficient to provide a meaningful comparison and does nothing to mitigate the only Class I impact identified in the DEIR. GOL12 GOL13

Additionally, the DEIR does not provide sufficient information for a decision-maker to make a statement of overriding considerations. There is little to no detail included in the DEIR as to the safety improvements provided due to the Draft Master Plan concept. As more detailed in the attached comment table, additional supporting material must be included in the CEQA document in order to provide justification for the conclusion that the environmentally superior alternative would not meet the project objective of improved safety. GOL14

6. Other Analysis Flaws

The City of Santa Barbara acknowledges that sea level rise resulting from climate change will increase the frequency and severity of storm-related flooding, posing increased future risk to the Santa Barbara Airport (see the Santa Barbara Climate Action Plan). However, the DEIR fails to identify and analyze this issue, despite the Airport's location in a slough, which already renders it highly vulnerable to naturally occurring events, including storms and extreme high tides. Given that the Project includes new and increased development in the floodway and the entirety of the Project is within the 100-year floodplain, the DEIR's failure to discuss the physical impacts associated with future sea-level rise is a glaring omission in the document. GOL15

Thank you for considering the City's comments regarding the DEIR, as presented in this letter and in the attached table. If you have any questions regarding our comments, don't hesitate to contact me at 805-961-7557. GOL16

#17 et seq. - follow table numbers

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Sincerely,

Anne Wells
Advance Planning Manager

Attachment: Comment Table

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

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

Number	DEIR Reference	Draft EIR Comment	
		Executive Summary	
1	ES-3–4.	There is no mention of the Airport Industrial Specific Plan in the *Required Discretionary Actions and Other Agency Approvals* section. The March 20, 2012 staff report on for the Airport Master Plan Initiation clearly states that adding the Aviation Facilities Zone to the Master Plan area, which the Draft Master Plan appears to do, would require amendments to the Airport Industrial Specific Plan, the Local Coastal Plan, and the Airport Zoning Ordinance. These amendments must be discussed and analyzed throughout the CEQA document.	GOL17
2	ES-8–13, Tables ES-2 and ES-3	The two tables in the Executive Summary provide a title for each Impact analyzed in the DEIR. These titles are not provided in Chapter 4 of the DEIR. In Chapter 4, each impact is discussed, but the actual impact is never written out in the same way it is in the Executive Summary. This provides confusion as to what actual impact is being discussed and analyzed. The reviewer of the document should not have to rely on the Executive Summary for this information.	GOL18
3	ES-13	The DEIR states that the project "would not foster economic or population growth and is not considered growth-inducing." Consequently, the DEIR only considers impacts associated with changes in the Airport layout, not with the increased operations predicted in the Draft Master Plan. As stated in the City of Goleta's comment letter, this approach is inadequate. Growth-inducing development included in the Draft Master Plan, including increased terminal space, improved parking, and enlarged and new FBO sites, must be analyzed within the DEIR and the associated impacts must be fully considered and mitigated.	GOL19
		Chapter 1 Introductory Information	
4	1-2, 2-2.	What does "moderate growth" at the airport in the City of Santa Barbara General Plan EIR mean? With no explanation, there is no way to evaluate whether the analysis done in the General Plan EIR is sufficient to tier off of in the DEIR.	GOL20
5	1-3	In a letter dated July 30, 2014, the City of Goleta requested that an analysis of noise impacts be included in the DEIR. The City again makes this request. The noise contours surrounding the airport clearly increase over the lifetime of the proposed project. In the Initial Study, there does not appear to be any discussion of the extension of Runway 15L. Presumably, this extension will lead to extended noise contours. Additionally, The Initial Study dismisses any project related impact on the noise contours by stating that the larger noise contours in 2032 a result of overall growth occurring at the Airport and not as a result of future projects (Appendix A-40). When considering the increased planes in Table 1 (Appendix A-90), it is hard to imagine how the improvements to the terminal and to the FBO sites will not induce this growth in the Operational Fleet Mix. The DEIR should not simply ignore this resultant growth and the consequent increase in noise impacts to the areas surrounding the Airport. Rather than enjoying a benefit of decreased plane noise in the future, Airport neighbors will experience similar noise levels because of the Airports actions to increase larger fleet operations. Additionally, the Initial Study seems to focus on long-term noise associated with take-offs and landings. Consideration of operational impacts due to the re-configured north aviation are must also be considered.	GOL21 GOL22 GOL23

Number	DEIR Reference	Draft EIR Comment	
6	1-3	In a letter dated July 30, 2014, the City of Goleta requested that an analysis of visual impacts be included in the DEIR. The City again makes this request. The proposed project includes the addition or expansion of several structures close to the boundary with the City of Goleta and an eight-foot high chain link fence along South Fairview Avenue. In the Initial Study, p.A-21 of the DEIR, there is a presumptive statement that "[n]one of the projects would have a substantial adverse effect on the scenic views or resources." It is unclear how this conclusion was reached. Without a detailed analysis in the DEIR, the presumption that there is no impact on Scenic View and Scenic Highways is indefensible.	GOL24
	Chapter 2 Project Description		
7	General	The DEIR must include a clear geographic scope for the Master Plan in the Project Description. The DEIR appears to focus on development within the Airport boundary south of Hollister Avenue. However, there are project components, like the removal of the long term parking lot north of Hollister Avenue and avigation easements that fall outside of this area and in some cases outside the jurisdiction of the City of Santa Barbara. The DEIR and Master Plan must make the geographic scope of the project clear in the Project Description and must limit project components to this area.	GOL25
8	General	The DEIR must include a new Exhibit 2A depicting the boundaries for: the Santa Barbara Airport, the City of Santa Barbara, the City of Goleta, the 1997 Santa Barbara Airport Industrial Area Specific Plan (Specific Plan), and the proposed Master Plan so it is clear how the various boundaries overlap with the proposed Master Plan. Without this information, it is not possible to accurately analyze the impacts of the proposed project.	GOL26
9	General	Four parcels east of Fairview Avenue and north of Hollister Avenue (APNs 073-080-032, -005, -030, and -023) are located within the jurisdiction of the City of Santa Barbara, immediately adjacent to an Old Town neighborhood in the City of Goleta. The DEIR project description and proposed Master Plan do not address future growth or possible changes to these four parcels. Because the parcels are not included in the 1997 Specific Plan, the DEIR should clarify what planning document guide the land use and zoning for these parcels and whether or not growth or changes will occur within these four parcels. Further, the DEIR should evaluate the related effects of any changes.	GOL27
10	2-1	The project objectives are too narrowly constructed so as to provide no feasible alternative that will meet the objectives stated.	GOL28
11	2-2	The sentence that reads "The City's General Plan considers 'moderate growth' at the Airport. The above forecasted growth projections fall within the City's General Plan assumption for the Airport." must be removed. This statement has nothing to do with the project description. Rather, this statement is related to the analysis of project impacts. As such, this statement does not belong in Chapter 2.	GOL29
12	2-4, Exhibit 2B	The DEIR must include what will happen with the current Maintenance Yard once the new Maintenance Yard is established. Exhibit 2B of the DEIR and 6A of the Draft Master Plan identify the current Maintenance Yard as a Proposed Airport Revenue Parcel. This use will increase traffic, have biological impacts, and potentially create	GOL30

Number	DEIR Reference	Draft EIR Comment	
		aesthetic impacts. As such, the used of this area must be discussed and the impacts adequately analyzed.	GOL30 cont'd
13	Exhibits 2B–2E	In the DEIR, the pink border around the Airport property should be changed to be City border, not just Airport Property line. This more clearly represents the various jurisdictions impacted along this border.	GOL31
14	Exhibits 2B–2E	Exhibit 2E includes a floodway layer which helps in understanding the development and removal of development in the floodway. This floodway layer should be included in all Exhibits to better understand the impacts of the Draft Master Plan.	GOL32
15	Exhibit 2B, 2C, and 2E	The size of the Proposed Paved Islands is not the same in the various exhibits. This inconsistency is also true of the Draft Master Plan. Please reconcile.	GOL33
16	Exhibit 2B and 2C	It is unclear why the abandoned pavement at the eastern end of Runway 7-25 as shown in the Draft Master Plan Exhibit 4C is not included elsewhere in the Draft Master Plan or the DEIR. The abandoned pavement is also included in the FAA approved Airport Layout Plan and the legend identifies that this pavement will be removed. The Draft Master Plan and DEIR must be updated to reflect this change and the impacts of the removal must be included in the impacts analysis throughout the DEIR.	GOL34
17	Exhibit 2C	The legend for this Exhibit includes a Proposed Class 1 bikepath. However, this is not clearly shown on the map. Please clarify and mark as appropriate.	GOL35
18	Exhibit 2E	Reference to the closure of the parking lot north of Hollister Avenue should be removed as this area appears to be outside the geographic scope of the Draft Master Plan.	GOL36
19	2-5	Discussion and analysis of the closure of Long Term Lot 2 should not be included in the Project Description. This area appears to be outside the geographic scope of the Master Plan and any reduction in use is speculative as the parcel may be used for another use in the future.	GOL37
20	2-5	The project description does not include discussion of a new restaurant/conference center where the existing Airport administration building is located. In order to be consistent with the Draft Master Plan, this element of the proposed project must be included in the DEIR. Additionally, the impacts of this part of the proposed project, including visual and transportation impacts must be thoroughly analyzed.	GOL38
21	Exhibit 2E	Exhibit 2D of the Draft Master Plan and Exhibit 2E of the DEIR are meant to show the same, North Landside Development Concept. However, there are multiple discrepancies between the concepts. Please reconcile.	GOL39
		Chapter 3 Project Alternatives	
22	3-5	The DEIR notes that the No-Project Alternative would result in the Airport's inability to accommodate the project aviation demands of the service area. Consequently, the DEIR must acknowledges that the proposed project is in fact growth inducing. Without the planned improvements at the airport, the growth would not occur.	GOL40
23	3-6	The DEIR must further explain why the Environmentally Superior Alternative does not remedy Taxiway Hot Spot #1. See comment below for further details.	GOL41
		Chapter 4 Environmental Conditions, Impacts, and Mitigation	
24	General	The structuring of the impacts analysis is confusing and makes review difficult. There are several instances when one "impact" is actually several. For instance, Impact HYD-2 includes "Result HYD-2" which is actually three separate impacts. Each of these three impacts should be numbered separately. Additionally, the	GOL42

Number	DEIR Reference	Draft EIR Comment	
		document must make clear which mitigation measures apply to each impact. Again, looking at HYD-2, the third HYD-2 impact refers to mitigation yet nowhere in that paragraph is the specific mitigation cited or explained. Only two pages later are hydrology and water quality impacts explained, but there is no cross-reference as to what or which impacts they apply. The only place this information is provided is in the Executive Summary and that is not sufficient.	GOL43
		Chapter 4.1 Air Quality/Greenhouse Gas Emissions	
25	4-12, AQ-4	The DEIR must explain more clearly how the Draft Master Plan conforms to the City of Santa Barbara's adopted Climate Action Plan. Result AQ-4 states the Draft Master Plan is consistent with the City's Climate Action Plan. However, the Draft Master Plan and DEIR do not include Strategy 6 of the Climate Action Plan, which calls for a solar photovoltaic project at the Airport located within the long-term parking lot. The date for the implementation of this measure in the Climate Action Plan is 2015. Consequently, this project should be included in the Airport Master Plan. Without the inclusion of the solar project in the Master Plan, a finding of consistency with the City's Climate Action Plan cannot be made.	GOL44
		Chapter 4.2 Biological Resources	
26	4-34, BIO-1	There is no need to be speculative about the spatial extent of impacts due to the extension of Taxiway M. Exhibit 2D clearly lays out the area that will need alteration for the extension of the Taxiway. This disturbed area should be calculated and included in the DEIR analysis.	GOL45
27	4-34–35	Impact BIO-1 clearly impacts wetlands. The areas disturbed due to the extension of Taxiway H will clearly and irrevocably damage wetlands and significant habitat. The recent survey work is insufficient to suggest the impacted areas are not, or even potentially not, wetlands. A more comprehensive survey of habitats, species, and wetlands must be done over several years and seasons to better understand the impacts associated with the proposed new development. Without this information, BIO-1 must be a Class I impact.	GOL46
28	4-37–40, BIO/mm-1.	BIO/mm-1 is a critical mitigation measure. The Programmatic Wetland Restoration Plan should be included as an appendix to the DEIR. This Plan must be completed prior to approval of the Master Plan and Certification of the Final EIR (p. 7-3). Consequently, the Plan should be included so that the ability of the Plan to mitigate BIO-1 to Less Than Significant can more accurately be analyzed.	GOL47
		Chapter 4.3 Cultural Resources	
29	4-54, Impact CR-3	The DEIR must include more details about the sensitivity maps and screening process contained in the Master Archaeological Resources Assessment for the Santa Barbara Municipal Airport (MARA). Without these maps and details being provided in the DEIR, it is not possible to assess the ability of CR/mm-2 to mitigate the impacts of CR-3.	GOL48
		Chapter 4.4 Geology and Soils/Hazards and Hazardous Materials	
30	4-61, Impact G/HAZ-2	The soils in this area have been mapped in Santa Barbara General Plane EIR as having a liquefaction potential (page 8-7). This information must be included and considered in the analysis of this impact.	GOL49
31	General	Details about the increased gas storage at the fuel farms at the Airport must be provided in the DEIR and the	GOL50

Number	DEIR Reference	Draft EIR Comment	
		increased risks associated with storing that material must be considered in this section.	GOL50 cont'd
		Chapter 4.5 Hydrology and Water Quality	
32	4-73, HYD-2	The proposed project includes development in multiple areas within the floodway (including the new taxiway along Runway 7-25 and the enlargement of the fuel farm northeast of the runways) and considerable development and redevelopment within the 100-year floodplain. These impacts, as identified in HYD-2, clearly rise above a Class III, Less than Significant Impact. Adherence to Chapter 22.24, Flood Plain Management of the Santa Barbara Municipal Code may help to mitigate some of these impacts, but they do not change the fact that these are significant impacts. In particular, the enlargement of the fuel farm within the floodway could have catastrophic impacts to hydrology and water quality that must be fully analyzed and mitigated.	GOL51
33	4-76, HYD/mm-1	The DEIR should include an in depth discussion of sea-level rise and how the Airport can adequately mitigate the impacts associate with sea-level rise. Deferring this analysis to a later date fails to provide the necessary overarching mitigation to this critical issue at the Airport. It should be noted that in the City of Santa Barbara's Climate Action Plan, the City expected the new "Airport Facilities Plan" to study, not just defer, climate studies including sea level rise.	GOL52
34	4-76, HYD/mm-1	HYD/mm-2 will have impacts elsewhere that must be considered. In order to reduce flooding at the Airport, that water must go elsewhere. The DEIR must include consideration of this externality if HYD/mm-2 is to be used to mitigate a significant impact of the project.	GOL53
		Chapter 4.6 Land Use and Planning	
35	4-87	Impact LU-2 is titled "Compatibility with applicable General Plan policies and other City plans" in Table ES-2. However, in the discussion of Impact LU-2, the Airport Industrial Specific Plan is not mentioned, discussed, and consistency with that Plan is not analyzed. Without that analysis, a determination that LU-2 is a Class III impact cannot be made.	GOL54
36	4-87	Impact LU-2 includes consistency with the City of Santa Barbara's Climate Action Plan. In order for this impact to be a Class III impact, the DEIR must clarify how the Draft Master Plan is consistent with the City's Climate Action Plan. This is particularly the case given that the Draft Master Plan does not include several reduction efforts that are included in the City's Climate Action Plan. These include a centralized location for the terminal and fixed-base operations at the Airport (see p. 2-19 of the Climate Action Plan). Additionally, in the Climate Action Plan, reduction measure 7 is a solar photovoltaic project at Airport's long-term parking lot (see p. 2-25 of the Climate Action Plan). This project is not included in the Draft Master Plan. If the Master Plan is to be in conformance with the Climate Action Plan, and therefore not a Class I impact, the Master Plan must include a solar project for the long-term parking area.	GOL55
37	4-89–90	The DEIR states a three-part test for airfield safety projects resulting in wetland impacts. The third part of the test is that "the expansion is necessary to *maintain existing* capacity." However, the DEIR conclusion to the discussion of the three-part test references increased efficiency and that the improvements "would not *increase*	GOL56

Number	DEIR Reference	Draft EIR Comment	
		the operational capacity of the Airport." (emphasis added). The discussion pivoted from analyzing whether the improvements are necessary to maintain existing capacity to whether it would increase capacity. These are two separate things. Without explaining how the third part of the three-part test can be shown for the runway extension into a wetland, the determination of LU-3 as a Class II rather than a Class I impact cannot be made.	GOL56 cont'd
38	4-95	In order to conclude that LU-4 is a Class II impact, a much more comprehensive analysis of the City of Santa Barbara General Plan, Airport Zoning Regulations, and the Airport Industrial Specific Plan must be done. As stated above, compatibility with development in wetlands must be compatible with the City of Santa Barbara's G-S-R zoning designation. Currently, the DEIR fails to exhibit this compatibility and therefore a determination that LU-4 is a Class II rather than Class I impact is unsupported. In terms of the Airport Industrial Specific Plan, the DEIR must include a thorough consideration of the policies included in that plan. Simply stating that "[n]o issues with the Specific Plan #6 overlay as a result of the recommended development are anticipated," is not a sufficient analysis to determine that LU-4 is a Class II rather than Class I impact.	GOL57
		Chapter 4.7 Public Utilities (Solid Waste Disposal)	
39	4-100	The Draft Master Plan includes a new lavatory dump station in the southeastern portion of the Airport Property. This additional lavatory dump station constitutes a new or expanded waste treatment or collection facility. The impacts of this development, including issues related to potential flooding, must be included in the DEIR.	GOL58
		Chapter 4.8 Transportation/Traffic	
40	4-112	The DEIR briefly mentions the Santa Barbara County Congestion Management Program (CMP) but provides little in the way of analysis in terms of the CMP. The DEIR must include a more thorough discussion of the CMP and determine whether the proposed project triggers compliance with the CMP. The brief references to the CMP are insufficient.	GOL59
41	4-118	The DEIR must clarify why projects identified in the Draft Master Plan are not considered to have a potential impact on traffic. These include the addition of four new revenue support parcels and two 15-unit T-hangars on the western side of the north aviation area and a new restaurant/conference center on the eastern side of the north aviation area. In the entirety of the proposed project, the traffic impacts associated with these new facilities need to be considered and analyzed.	GOL60
42	4-119, 4-120, Table 4R	The DEIR includes cumulative projects provided by the City of Goleta. However, the DEIR does not include other projects within the vicinity that are proposed by the City of Santa Barbara. These include the Direct Relief International Project and other planned developments in the Airport Industrial Area. While including City of Goleta projects are important to the cumulative impacts analysis, the City of Santa Barbara must also include their own projects in order to properly understand cumulative impacts in the project vicinity. All other cumulative projects in the proposed project vicinity should be treated in the same manner and all should be included in Table 4R and their resultant trips included in the project's traffic analysis.	GOL61

Number	DEIR Reference	Draft EIR Comment	
43	4-120	The DEIR assumes Ekwill and Fowler Road extensions by 2022. While analyzing project and cumulative impacts with these road extensions is helpful, additional analysis must be included in the DEIR. Because the road extensions have not completed the approval process and the City of Santa Barbara has raised the concern that locating the roundabout within the RPZ may be inconsistent with the revised 2012 FAA guidelines, the Airport must include a traffic analysis without those road extensions and re-analyze traffic impacts based on these potential future conditions.	GOL62
44	4-125–130.	The DEIR explores several possible mitigation measures to address the Class I impact for T-3: Cumulative impacts to traffic and circulation in the long-term (2032) but did not include any for various reasons, including the need for the City of Goleta to implement the projects. However, there are other potential mitigation measures that the City of Santa Barbara could implement. These include diverting traffic entering Hollister Avenue from Airport roads west on to Hollister and therefore diverting drivers away from the impacted intersections.	GOL63
		Additionally, the City of Santa Barbara should assess an overpass/on-ramp within the City of Santa Barbara controlled Airport Industrial Area. This would serve to alleviate impacts to City of Goleta intersections. Finally, a mitigation measure providing shuttle/bus service between the Amtrak Station and the Airport Terminal should be considered. This mitigation may help to offset the need for car trips to the airport, thus alleviating the impacts to City of Goleta intersections.	GOL64 GOL65
		Simply stating that there are no possible mitigations to the Class I impact is unacceptable.	GOL66
		Additionally, the DEIR notes that the Airport will pay a fair-share allocation for future intersection improvements based on the City of Goleta's traffic mitigation fees (p. ES-8). The agreement to pay a fair-share should be included as a mitigation measure for Impact T-3. This agreement with the City of Goleta can establish how the City of Santa Barbara can help mitigate their Class I impact.	GOL67
		Chapter 5 Other CEQA	
45	General	This Chapter must be updated based on the comments provided in the City of Goleta's letter and this comment table. Updates include but are not limited to an updated of the effects found not to be significant, the unavoidable significant environmental effects, the discussion of growth-inducing impacts, and the cumulative impacts of the project.	GOL68
		Chapter 6 Summary of Alternatives Analysis	
46	6-3	Section 15126.6(a) of CEQA requires a "range of project alternatives for examination." However, the DEIR only includes one alternative, excluding the No-Project Alternative. This does not provide a reasonable range of alternatives to consider other ways to achieve some or all of the project objectives. This is especially true considering the only other alternative analyzed is identical in almost all ways to the proposed project.	GOL69
47	6-3	The DEIR must consider alternatives that lessen significant impacts of the project. The current DEIR identifies cumulative traffic impacts (Impact T-3) as the only Class I impact. Consequently, there must be	GOL70

Number	DEIR Reference	Draft EIR Comment	
		an alternative that lessens this impact. Currently in the DEIR, there is no alternative except the no-project that does this.	GOL70 cont'd
48	Table 6A, Page 6-5	In the Transportation/Traffic section of the Table, it is unclear why the rows for Impacts T-2 and T-3 include reference to construction traffic. Construction traffic should be included as a separate short-term impact.	GOL71
49	6-5–6	When discussing the DEIR, the environmentally superior alternative is described as not accommodating future airport operations in a safe manner. The DEIR specifically references the FAA safety "hot spot" for this conclusion. It appears that this mention is referencing Hot Spot #1 from Exhibit 4C of the Draft Master Plan. The Draft Master Plan describes as follows: "Pilots are sometimes confused by the angle at which Taxiway C intersects Runway 7-25." (p. 4-8). The Draft Master Plan further describes the recommendation for the taxiway extension from the FAA Local Runway Safety Action Plan for the Airport (Action Plan). The City of Goleta would like to see this Action Plan included as an appendix to the DEIR. This would provide clearer details on the necessity of the taxiway extension to address safety and circulation issues, including remedying Hot Spot #1. Not only will the Action Plan provide helpful additional information, but this document may help the City of Santa Barbara in their necessary statement of overriding considerations.	GOL72
	Appendices		
50	Appendix F	The City of Goleta has several concerns about the methodology and analysis of traffic impacts included in Appendix F: Traffic Impact Study. Specific comments are provided below. Without a thorough and sound traffic analysis, the impacts of the Draft Master Plan on Goleta intersections cannot be accurately or adequately analyzed.	GOL73
51	F-6	A more detailed discussion of the project description is needed. Discuss and explain the Fixed Base Operator (FBO) facilities so that potential traffic impacts can be better understood. This discussion should include the size of the FBO facilities currently compared to what is proposed as part of the project. Details of trip generation for the changes in size and use of the FBOs should be discussed in the traffic impacts analysis.	GOL74
52	F-24	The Existing Conditions Peak-Hour Intersection LOS Analysis (Table 3-1) presents values that are too low for the Los Carneros Road/U.S. 101 Southbound Ramps intersection, Fairview Avenue/Calle Real intersection, and Fairview Avenue/U.S. 101 Northbound Ramps intersection. Please update as necessary.	GOL75
53	F-28	Trip Generation South and Trip Generation North are briefly explained. However, the analysis should include the methodology used divide trips between North and South. This analysis should also include how the trip generations would change without the Ekwill and Fowler Road extensions.	GOL76
54	Appendix B to Appendix F	The traffic counts used should provide more detail as to what type of vehicle entered and exited various Airport facilities. This information would help provide more precise information about vehicular behavior at the Airport and how trip distribution would change under various land use scenarios. By lumping all vehicles in to one category, critical information is missed.	GOL77

Number	DEIR Reference	Draft EIR Comment	
		Additionally, traffic counts to determine ins and outs at the entrance and exit of the existing Airport terminal should have been performed.	GOL77 cont'd
55	Appendix C to Appendix F	SYNCHRO is the software used to generate LOS results for project analysis. The methodology for this planning method analysis is Intersection Capacity Utilization (ICU). Appendix C of the Traffic Impact Study for the DEIR is not based on the 1,600 vph saturation flow rate with 10% lost time convention adopted by the City of Goleta which is also consistent with SBCAG's Congestion Management Program. The SYNCHRO analysis must be redone with the appropriate parameters for the ICU approach. Once this is done, the LOS analysis must be redone to adequately analyze project and cumulative impacts.	GOL78

Response to Letter 8
City of Goleta (GOL)
Dated October 30, 2015

GOL-1: This comment states that the proposed project boundary is unclear.

Response: Comment noted. Several exhibits of the Recirculated Draft EIR have been revised to include a Master Plan boundary line, which clearly shows that the draft Final Master Plan includes only areas south of Hollister Avenue, with the one exception of a recommended avigation easement for a 7.4-acre area located on the northwest corner of Hollister Avenue and South La Patera Lane. See revised Exhibits 2B, 2C and 2E.

GOL-2: This comment states that the *Santa Barbara Airport Industrial Area Specific Plan* (SP-6 Plan) includes some, but not all of the Santa Barbara Airport, and guides development both north and south of Hollister Avenue.

Response: Comment noted. Subarea 1 of the SP-6 Plan is included within the proposed Master Plan area located north of the airfield and south of Hollister Avenue.

GOL-3: This comment states that since the Airport Master Plan "alters growth" within the Specific Plan boundary, it would be inconsistent with the SP-6 Plan without a Specific Plan amendment.

Response: The City of Santa Barbara Planning staff has analyzed the proposed Master Plan's consistency with the City's SP-6 Plan and has determined that it is consistent with the intent of policies within the Plan, including policies specific to Subarea 1. See Recirculated Draft EIR, Section 4.6.4, *Compatibility with the Santa Barbara Airport Industrial Area Specific Plan and SP-6 Zoning*.

GOL-4: This comment opines that the Draft EIR project description identifies future airport growth, such as increased enplanements, and that all future airport growth must be evaluated in the Draft EIR.

Response: Increased enplanements and other airport activities, such as based aircraft and overall operations (takeoffs and landings), are a function of several factors including national aviation trends, the national and regional economic outlook, fuel prices, the number and type of airports within an airport's service area, and the preferences and business decisions of airline carriers. Although an airport can try to affect this growth by offering a competitive and safe environment, an Airport Master Plan is primarily a facilities and capital improvement plan that seeks to align

recommended safety and efficiency improvements to an airport's needs as they occur and as funding becomes available. Therefore, it is important to have realistic growth projections on which to base the recommended development plan.

This does not mean, however, that growth at an airport is dependent upon implementation of its Master Plan. In fact, the previous Master Plan projected that by 2015 the Airport would have 235 based aircraft and 176,500 total operations. In actuality, based on the Airport's reported activity for the 12 months ending in December 31, 2014, there were 188 based aircraft and 104,900 total operations at the Airport. Thus, the growth assumed in the Plan was not reached in spite of the Plan's implementation.

No changes to the capacity of the airfield will occur as a result of this Master Plan. Environmental impacts of the proposed Master Plan are indirect and are related to future physical changes proposed at the Airport for safety and efficiency purposes, such as relocating fixed base operations or the Taxiway H Airfield Safety Project. These impacts have been evaluated at a programmatic level within the Draft Program EIR since none of the individual Plan recommendations have been designed. As individual development projects are proposed and funding becomes available, more detailed environmental analysis will occur, as appropriate, based on preliminary project design.

Potential future growth in enplanements at the Airport has, however, been included in the cumulative growth scenarios considered in the Draft EIR. For example, the traffic impact analysis used the City of Goleta's traffic model to predict cumulative traffic impacts in the vicinity of the Airport during the 20-year planning horizon of the Master Plan. The model runs for this analysis included growth projections for the Airport that were aligned with the proposed Master Plan aviation activity forecasts as well as other future projects likely to occur in the Goleta area, with and without several recommended street and intersection improvements. See also the revised Traffic Impact Study in the Recirculated Draft EIR (Appendix C).

GOL-5: This comment refers to more detailed comments related to the traffic analysis.

Response: See responses to GOL-59 through 67 and GOL-73 through 78.

GOL-6: This comment states that impacts related to the Runway H Airfield Safety Project will occur to "sensitive wetland habitat" and should be reclassified to Class I.

Response: First, the comment incorrectly refers to the recommended airfield safety project as a runway extension. The Master Plan does not recommend the expansion of any runways. The recommendation is for the extension of a taxiway to avoid runway excursions.

Second, the comment implies that the proposal would be located within existing wetlands. As discussed in Section 4.2.4, Impact BIO-1 of the Draft EIR (as well as Appendix C and D), the primary

habitat located in the area of the proposed taxiway extension is disturbed annual brome grassland that is composed primarily of non-native grasses, broad-leaf forbs, and noxious weeds, rather than wetlands. However, as stated in the Draft EIR text, depending on the amount of rainfall, this area may also function as an intermittent wetland area.

As part of the EIR process, the Airport has worked with the California Department of Fish and Wildlife (CDFW) to prepare an acceptable programmatic mitigation program for all biological impacts in support of a Class II impact designation (see Recirculated Draft EIR, Section 4.2.7, BIO/mm-1 through BIO/mm-4). A detailed mitigation program that meets the parameters of the programmatic mitigation program will be required as a condition of approval if the proposed Taxiway H Airfield Safety Project moves forward.

GOL-7: This comment states concerns that the biological survey was conducted during the dry season during drought conditions.

Response: Additional project-specific surveys, which will be used for developing a detailed mitigation program, will be required at the time that the Taxiway H Airfield Safety Project moves forward. This EIR is a programmatic EIR and is not intended to provide the level of detail necessary to approve or evaluate specific impacts of any particular development project recommended within the Master Plan. As such, a one-season survey is adequate to provide an indication of when, and where, additional project-specific surveys will be necessary.

GOL-8: This comment states that Impact BIO-1 should not be limited to jurisdictional wetlands.

Response: See response to comment **GOL-6** above regarding coordination with CDFW regarding the preparation of an acceptable programmatic biological mitigation program.

GOL-9: This comment requests that the programmatic biological mitigation program be made available for review.

Response: The initial programmatic mitigation program was contained in the Draft EIR in Section 4.2.7, BIO/mm-1 and included Table 4G and Exhibit 4D. A revised program, based on comments from CDFW, is included in the Recirculated Draft EIR, Section 4.2.7, BIO/mm-1.

GOL-10: This comment opines that even if there is a programmatic mitigation program for biological resources, the Airport is not able to mitigate the "destruction of wetlands and biological resources" to an insignificant level.

Response: This determination is more appropriately decided by the resource agencies tasked with protecting the subject resources according to applicable statute and regulations. In the past,

safety projects at the Airport have had acceptable mitigation programs approved by both the California Coastal Commission (CCC) and CDFW.

GOL-11: This comment states that analyzing one single alternative is inadequate.

Response: The Airport has undertaken extensive alternative analyses throughout both the initial Master Planning process as well as within the environmental process, as documented in Sections 3.1 and 3.2 of the Draft EIR. As a result, the project description was refined to remove potential environmentally harmful aspects of the original plan. These additional four alternatives did not need to be fully analyzed within the environmental document since they were incorporated into the Master Plan as project characteristics rather than mitigation. The Draft EIR does include two additional alternatives, the No Project alternative and an Environmentally Superior alternative, as required by the CEQA Guidelines.

GOL-12: This comment maintains that the Draft EIR does not provide a reasonable discussion of other Draft Master Plan concepts that could attain some of all of the project objectives.

Response: Exhibits 3A and 3B of the Draft EIR contain summaries of the Master Plan treatment of the various options to obtain the objectives of the Master Plan as well as the environmental issues related to the various airfield, terminal area, and north landside alternatives considered. In addition, the entire draft Final Master Plan is incorporated by reference as allowed by the CEQA Guidelines, Section 15150.

GOL-13: This comment states that the "environmentally superior alternative" does not mitigate the only Class I impact identified in the Draft EIR.

Response: This is correct since the "environmentally superior alternative" presented in the Draft EIR is to allow a reduction in potential impacts to biological resources, which is identified as a Class II impact. Due to the need for comprehensive mitigation, it was determined that it would help the Lead agency in their decision-making process to have an alternative other than mitigation to consider.

The Class I impact identified in the Draft EIR is related to cumulative traffic impacts in the long term (i.e., by the year 2032). Based on the revised Traffic Impact Study contained in the Recirculated Draft EIR (Appendix C), cumulative traffic impacts could occur in both the years 2022 and 2032. However, given that the only project-related contribution to the cumulative traffic will be 12-15 vehicular trips during the PM peak-hour, the "No Project" alternative is the only alternative that will effectively provide a reduction in this impact. This is because the "No Project" alternative would not relocate the fixed base operator (FBO) currently located south of the commercial passenger terminal to the north side of the airfield.

GOL-14: This comment states that the Draft EIR does not provide enough information to allow the decision-maker to make a statement of overriding considerations.

Response: As previously mentioned in response to comment **GOL-12**, the entire draft Final Master Plan is incorporated by reference into the EIR, as allowed by the CEQA Guidelines, Section 15150, and provides detailed information regarding the merits and safety benefits of the proposed project.

GOL-15: This comment states that the Draft EIR does not analyze the potential future risk to the Airport from sea level rise.

Response: The City of Santa Barbara believes these concerns have been adequately addressed under Section 4.5, Hydrology and Water Quality. Based on recent CEQA case law, the Draft EIR inaccurately characterized flood hazards resulting from global climate change as a project impact. Pursuant to *California Building Industry Association (CBIA) vs. Bay Area Air Quality Management District (BAAQMD) (2015)*, CEQA analysis "is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents" (CBIA, 62 Cal. 4th at 97). The sea level rise analysis has been revised in the Recirculated Draft EIR (Section 4.5.1, *Anticipated Future Sea Level Rise and Hydrological Changes in Goleta Slough* and Section 4.5.4, Result HYD-2c), and is retained for informational purposes only. The proposed mitigation measures to address sea level rise remain as recommended mitigation measures.

GOL-16: This comment provides a contact number in the case of questions related to the City of Goleta's comments.

Response: Comment noted.

GOL-17: This comment states that an amendment to the SP-6 Plan is required to add the Aviation Facilities (A-F) Zone to the Master Plan area and that this, and other necessary amendments to the Local Coastal Plan and Airport Zoning Ordinance, should be discussed in the EIR.

Response: Based on the boundaries of the SP-6 Plan, no changes to the Aviation Facilities (A-F) zone at the Airport will be necessary to implement the proposed Master Plan. The only overlap between the Master Plan and the SP-6 Plan is within the existing general aviation area located south of Hollister Avenue, which is already zoned as either A-I-1 (Airport Industrial) or A-F. The redevelopment planned for the area would be consistent with this existing zoning. In addition, upon further City staff review as part of the environmental analysis, no SP-6 Plan amendment will be necessary. See responses to comments **GOL-3** and **GOL-54**.

Amendments to areas outside the SP-6 Plan area may be required to the Airport's LCP and Zoning Ordinance if the Taxiway H Airfield Safety Project is pursued. These amendments are already discussed in the Draft EIR in several sections. However, Section 2.4 has been revised to state that initiation of a LCP amendment, a General Plan amendment, and a rezone for that portion of the G-S-R zone that will be needed for the Taxiway H project will also be considered.

GOL-18: This comment states that Tables ES-2 and ES-3 in the Executive Summary of the Draft EIR contain titles for each impact analyzed that are not provided in the text and do not contain complete impact discussions, causing confusion as to what impact is being analyzed.

Response: The impacts identified in Tables ES-2 and ES-3 use the same identification system as Chapter Four of the Draft EIR and are organized as Class I, Class II, Class III, or Class IV impacts. Table ES-2 identifies the Class I and Class II impacts and the proposed mitigation, while Table ES-3 and ES-4 list the Class III and Class IV impacts, which do not require mitigation. The impact discussions are labeled by letter identifiers followed by a numbering system. For example, Impact AQ-1 is the first impact discussed under Air Quality. Due to the fact that the Executive Summary is intended only to summarize the information contained in the Draft EIR, the summary tables do not contain the entire impact discussion; however, each mitigation measure is listed in its entirety and additional summary text for each impact has been added into these tables in the Recirculated Draft EIR in response to this comment.

GOL-19: This comment disagrees with the Draft EIR conclusion that the proposed Master Plan will not induce growth.

Response: The Master Plan is only a redevelopment plan for the Airport; no changes to the airfield capacity will occur. The increase in overall operations at the Airport projected in the 20-year forecasts that were used as a basis for the Master Plan are primarily a function of national and regional economic trends. See response to comment **GOL-4**.

GOL-20: This comment asks what "moderate growth" at the Airport in reference to the City of Santa Barbara's recent General Plan update means.

Response: The City's General Plan considers "moderate growth" at the Airport that was based on the 2003 *Aviation Facilities Plan's* aviation demand forecast which included scenarios for one to four percent annual growth rate of annual enplaned passengers and two percent per year growth in general aviation (GA) aircraft operations.) This information has been added to the Recirculated Draft EIR in several places (see Sections 1.2, 2.1.1, and 4.6.4, Impact LU-2).

GOL-21: This comment requests that an analysis of noise be included in the Draft EIR and asks for a discussion of the extension of Runway 15L.

Response: First, the Master Plan does not include the extension of any of the runways at the Airport, including Runway 15L. An existing displaced threshold would be removed from the end of Runway 15L. This change was included in the noise modeling discussed in the following paragraph.

Second, the Master Plan included the modeling of both existing (2011) and future (2017 and 2032) noise contours at the Airport. See Appendix B of the draft Final Master Plan, Exhibits B18, Exhibit B19, and B20. This analysis is incorporated into the Draft EIR by reference.

As shown in these exhibits and identified in Table B9 of the draft Final Master Plan, during the implementation period of the Master Plan, the noise contours associated with the Airport are expected to contract slightly (i.e., get closer to the Airport) due to an anticipated gradual shift over time from older, noisier aircraft to newer, quieter aircraft. Since aircraft noise will not increase over the lifetime of the Master Plan, it is not necessary to address it in the Draft EIR. The issue was discussed in the Initial Study as follows:

> "Due to a Congressional mandate for the phasing out of older, noisier aircraft nationwide by 2015 and the anticipated economic-based decisions of Airport users to move towards more technologically-advanced business aircraft, the 60 and 65 CNEL for the Airport by 2017 are expected to be smaller than what exists today. By the year 2032, the noise contours will have expanded some over what would occur in 2017 due to an increase in overall Airport activity, but are still expected to remain closer to the Airport than what currently exists. Therefore, impacts due to increased noise levels and exposure to high noise levels at the Airport during the planning horizon of the proposed Master Plan are *less than significant* since fewer homes would be affected by noise over the 60 CNEL than currently occurs today." (Pages A-39 and 40, Draft EIR).

GOL-22: This comment states that improvements to the terminal and FBO sites recommended in the Master Plan will "induce growth in the operational fleet mix" that is shown in Appendix A, Table 1 (pages A-90 and A-91) of the Draft EIR.

Response: As is shown in the table, the projected increases in operational fleet mix at the Santa Barbara Airport will occur whether the "Proposed Action" or the "No Action" alternative is selected. The changes in fleet mix at an airport are rarely dependent upon on the airport's landside facilities, but airfield capacity changes, business decisions of the aircraft owners regarding technological and marketing conditions, and, in the case of the federal mandate to phase out older, noisier aircraft by the end of 2015, the regulatory environment.

GOL-23: This comment states that impact of operational impacts due to the re-configured north side aviation must be considered in the Initial Study.

Response: The relocation of FBOs to the north side of the Airport and the construction of additional hangars does not represent a change in land use from what currently is present in the area, i.e., general aviation storage and maintenance uses. Operational impacts cannot be analyzed at a programmatic level, when there is no defined operation to assess. To do so would be speculative. If future noise impacts could be an issue based on an FBO lease, these will be addressed as part of a project-specific analysis under the City's normal development review process at that time. However, it should be noted that the closest noise-sensitive land uses to the north side general aviation areas of the Airport are more than 0.25 mile away.

GOL-24: This comment requests that a detailed analysis of visual impacts from future hangars or other buildings north of the airfield and perimeter fence changes from 6-feet to 8-feet in height along South Fairview Avenue at the end of Runway 25 be included in the Draft EIR.

Response: This Draft EIR is a programmatic document that analyzes proposed changes in land use based on the proposed draft Final Master Plan. The visual impacts of specific buildings cannot be analyzed at a programmatic level, when there is no defined development plan to assess. Site-specific impacts of the recommended Master Plan concept plan will be addressed in subsequent environmental studies.

No changes in land use at the Airport are proposed with the exception of the relocation of an FBO from the south side of the commercial passenger terminal to the existing general aviation area on the north side of the airfield. In its place, a future parking lot or parking garage, if needed, would be allowed. Regarding the proposed increase in two feet in height for a section of perimeter fence located at the end of Runway 25, this is not considered to warrant a detailed visual analysis, especially given that the potential "view" in question is primarily of a runway. South Fairview Avenue and William Moffett Place along the east side of the Airport are not called out by the City of Goleta's General Plan/Coastal Land Use Plan as local scenic corridors (Figure 6-1).

GOL-25: This comment states that the Draft EIR must include a clear geographic scope for the Master Plan in the Project Description.

Response: Comment noted. Exhibits 2B, 2C, and 2E of the Recirculated Draft EIR have been revised to include a Master Plan boundary line, which shows that the draft Final Master Plan includes only areas south of Hollister Avenue, with the one exception of a recommended avigation easement for a 7.4-acre area located on the northwest corner of Hollister Avenue and South La Patera Lane. The text already states on page 2-3, paragraph 1 of the Draft EIR that no new development is proposed in the Master Plan for the Airport Industrial Area specific planning area located north of Hollister Avenue.

GOL-26: This comments states that the Draft EIR must include an exhibit that shows the boundaries for the Airport, the City of Santa Barbara, the City of Goleta, and the Airport Industrial Area Specific Plan.

Response: Exhibit 1A of the Draft EIR shows all of these items with the exception of the Airport Industrial Area Specific Plan. Exhibit 4H of the Draft EIR shows the zoning on all of the airport property, including those areas that area covered by the Airport Industrial Area Specific Plan (i.e., Specific Plan #6, City of Santa Barbara).

GOL-27: This comment asks about the status of four City of Santa Barbara parcels located just south of the railroad tracks and east of the S. Fairview Avenue.

Response: These parcels are outside of the planning limits of the proposed Master Plan and, as such, do not need to be included within the Draft EIR analysis.

GOL-28: This comment states that the project objectives are too narrowly constructed to provide feasible alternatives.

Response: An Airport Master Plan is a very specific type of planning document that must meet all of the safety objectives and criteria of the FAA. As such, alternatives that can be considered must also meet all applicable FAA standards and criteria. Refer to the draft Final Master Plan, Chapters Three, Four, Five and Six, all of which have been incorporated by reference into the Draft EIR.

GOL-29: This comment states that the discussion regarding forecast aviation activity is not part of the project description and should be removed.

Response: Comment noted. While we agree that forecast activity at the Airport is not part of the project description, it provides important information regarding the rationale for the recommended airport improvements discussed in the following sections of the project description. Therefore, the discussion has been moved to Section 2.1.1, Project Objectives of the Recirculated Draft EIR.

GOL-30: This comment states that the Draft EIR must include what will happen to the current maintenance yard once the new maintenance yard is established.

Response: This information is not currently known. The Draft EIR is a programmatic document that analyzes proposed changes in land use based on the proposed draft Final Master Plan. As such, the analysis assumed that existing buildings will remain in place. If reused, the new uses will be subject to the City's Flood Plain Management Ordinance. If removed, impacts of specific

physical changes cannot be analyzed at a programmatic level, when there is no defined development or redevelopment site plan to assess. Site-specific impacts of the recommended Master Plan concept plan will be addressed in subsequent environmental studies.

GOL-31: This comment states that the City (of Santa Barbara) limits should be shown on Exhibits 2B – 2E, not the Airport property.

Response: Comment noted. However, these exhibits are showing the proposed Master Plan development, which is related to the Airport boundaries, not just the various jurisdictions within the area. Exhibit 1A of the Draft EIR clearly shows the relationship between the cities of Goleta and Santa Barbara as well as the University of California, the California Coastal Zone, and the Airport property. Exhibits 2B, 2C, and 2E have been revised in the Recirculated Draft EIR to show the proposed Master Plan boundary.

GOL-32: This comment states that the Floodway layer be included on all exhibits.

Response: Comment noted. However, due to the amount of information conveyed on several of the exhibits, it is not feasible to include all background parameters on every exhibit. For this reason, information such as floodways, floodplains, the Coastal Zone, and the Goleta Slough Reserve has been presented only on those exhibits where the information is pertinent to the text discussions related to the particular exhibit.

GOL-33: This comments says that the size of the proposed paved islands is not the same on Exhibits 2B, 2C, and 2D (as well as in the partner exhibits within the draft Final Master Plan).

Response: The size of the proposed paved islands is the same within the exhibits; however, the scale of the exhibits is different. Exhibits 2B and 2C are at 1 inch = 800 feet, while Exhibit 2E is at 1 inch = 400 feet.

GOL-34: This comment asks why the abandoned pavement shown at the eastern end of Runway 7-15 on Airport Master Plan, Exhibit 4C, is not discussed in the Draft EIR.

Response: This pavement has already been abandoned and is part of the baseline conditions. The pavement is shown to be abandoned by the white "X"s painted on the pavement.

GOL-35: This comment asks about a Proposed Class I bike path referred to in the legend of Exhibit 2C of the Draft EIR.

Response: Earlier versions of the proposed Master Plan included a depiction of a proposed Class I bike path, which was part of the Santa Barbara County 2008 Regional Transportation Plan. However, due to the coordination that will need to take place with the Federal Aviation Administration before such a land use could be located on the Airport, this land use was removed from later iterations of the recommended Master Plan development concept exhibits. The legend of Exhibit 2C has been revised in the Recirculated Draft EIR to remove this item.

GOL-36: This comment states that reference to the closure of a parking lot north of Hollister Avenue should be removed from Exhibit 2E of the Draft EIR since the area is outside of the geographic scope of the draft Final Master Plan.

Response: Comment noted. This parking lot has already been closed. All Recirculated Draft EIR exhibits have been revised, as applicable, to remove this item.

GOL-37: This comment states that discussion of the closure of Long Term Lot 2 should be taken out of the project description.

Response: Comment noted. This parking lot has already been closed. The text in the Recirculated Draft EIR has been revised to remove all references.

GOL-38: This comment states that the Draft EIR should discuss the draft Final Master Plan recommendation for a new restaurant/conference center where the existing Airport administration building is located.

Response: This recommendation is no longer part of the proposed Master Plan since the Airport has since approved a new lease on the existing restaurant located just east of the administration building. These changes will be made part of the Final Master Plan once the EIR is certified, and prior to the Master Plan being adopted.

GOL-39: This comment states that there are discrepancies between the recommended concept plan shown on Exhibit 2D of the draft Final Airport Master Plan and Exhibit 2E of the Draft EIR.

Response: During the environmental process, several changes were made to the recommended development concept, including those identified to reduce the environmental impacts of the proposed Master Plan. These changes will be made part of the Final Master Plan once the EIR is certified, and prior to the Master Plan being adopted.

GOL-40: This comment refers to Draft EIR text on page 3-5 under the "No Project" alternative, which states, in part, "the primary result of this alternative would be an inability of the Airport to accommodate the project aviation demands of the service area…"

Response: As previously discussed in the response to **GOL-4**, increased enplanements and other airport activities, such as based aircraft and overall operations (takeoffs and landings), are a function of several factors including national aviation trends, the national and regional economic outlook, fuel prices, the number and type of airports within an airport's service area, and the preferences and business decisions of airline carriers. Although an airport can try to affect this growth by offering a competitive and safe environment, an Airport Master Plan is primarily a facilities and capital improvement plan that seeks to align recommended safety and efficiency improvements to an airport's needs as they occur and as funding becomes available.

GOL-41: This comment asks for an explanation of why the "Environmentally Superior" alternative does not remedy Hot Spot #1.

Response: Comment noted. The "Environmentally Superior" alternative, as shown in Exhibit 3E of the Draft EIR, would address the geometry issues related to the angle at which Taxiway C intersects Runway 7-25. However, other situations that can cause runway excursions would remain. In FAA Advisory Circular 150/5300-13A, *Airport Design*, the discussion of methods to reduce runway incursions includes the following:

> (c) Limit runway crossings. The airport designer can reduce the opportunity for human error by reducing the need for runway crossings. The benefits of such design are twofold – through a simple reduction in the number of occurrences, and through a reduction in air traffic controller workload.
>
> (d) Avoid "high energy" intersections. These are intersections in the middle third of the runways. By limiting runway crossings to the outer thirds of the runway, the portion of the runway where a pilot can least maneuver to avoid a collision is kept clear.
>
> (f) Avoid "dual purpose" pavements. Runways used as taxiways and taxiways used as runways can lead to confusion. A runway should always be clearly identified as a runway and only a runway.
>
> (g) Indirect Access. Do not design taxiways to lead directly from an apron to a runway. Such configurations can lead to confusion when a pilot typically expects to encounter a parallel taxiway.

Without the extension of Taxiway H to the end of the runway, aircraft still are forced to "circle back" on Taxiway A and cross the runway via Taxiway F to reach the ramp north of the runway and west of Runway 15R-33L.

GOL-42: This comment makes the general statement that the structuring of the impact analysis is confusing because there are instances where one "impact" is actually several.

Response: The example given is Impact HYD-2. The text in the Recirculated Draft EIR regarding Hydrology Impact HYD-2, as well as other impact sections where the text discusses more than one related impact together, has been revised to denote subsections of an overall impact category.

GOL-43: This comment states that the section discussing Impact HYD-2 refers to mitigation, but does not also discuss it in the section.

Response: Comment noted. Mitigation measures are listed in the final subsection of each environmental resource category discussion and numbered for easy reference. Each mitigation subsection is also listed in the Table of Contents.

GOL-44: This comment states that because the proposed Master Plan does not include a solar photovoltaic project within the Airport's long-term parking lot, it is not consistent with the City's adopted Climate Action Plan, which calls for this project with a projected target date of 2015.

Response: The Santa Barbara Airport has an entire plan dedicated to reducing its carbon footprint (i.e., the 2007 *Santa Barbara Airport Greenhouse Gas Inventory and Carbon Footprint Reduction Plan*), which includes the installation of 350 KW solar Photo Voltaic (PV) cells on a roof canopy used to cover cars in the Airport's long term parking lot. This type of project is not suitable for placement on the overall development concept plan of an Airport Master Plan, however, which provides a guide to ensure that the Airport is prepared to handle forecast future growth in an efficient and safe manner and shows general land uses, airside elements, and landside buildings and pavement. There is nothing in the proposed Master Plan that would prevent the City from constructing roof canopies with solar panels in the long term parking lot or from implementing any other measure listed in its Carbon Footprint Reduction Plan, although the FAA will require an obstruction analysis and a glint and glare study before giving its approval. Rather, funding sources for all such measures are the primary limiting factors.

GOL-45: This comment states that the DEIR analysis (BIO-1) should calculate the disturbed area for the Taxiway M extension.

Response: This response assumes that the commenter meant Taxiway H, since the proposed Master Plan does not include an extension of Taxiway M. No further response is necessary since the Draft EIR (page 4-34, top of page) already states with regards to the Taxiway H Airfield Safety Project that, "An estimated 12.4 acres of total disturbance would occur…" and that the vegetative

community to be disturbed would be annual brome grassland that is routinely mowed as part of the Airport's ongoing wildlife hazard management efforts.

GOL-46: This comment states that the above impact "clearly impacts wetlands" and that several years and seasons are necessary to evaluate the impacts from the Taxiway H extension or it must be called out as a Class I impact.

Response: As discussed in Section 4.2.4, Impact BIO-1 of the Draft EIR (as well as Appendix C and D), the primary habitat located in the area of the proposed Taxiway H Airfield Safety Project is disturbed annual brome grassland that is composed primarily of non-native grasses, broad-leaf forbs, and noxious weeds, rather than wetlands. However, as stated in the Draft EIR text, depending on the amount of rainfall, this area may also function as an intermittent wetland area. The current EIR effort is not meant to fully assess the impacts of a Taxiway H Airfield Safety Project, but rather is a programmatic assessment of an airport planning document. As such, the survey efforts undertaken in support of the Master Plan have identified the potential for wetland impacts and have provided the framework for future mitigation efforts. As identified in the CEQA Guidelines Section 15168(b)(4), one advantage of a program EIR is to "allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." As stated throughout the Draft EIR, additional, in-depth, analysis will be required before the actual Taxiway H Airfield Safety Project can be approved.

GOL-47: This comment states that the Programmatic Wetland Restoration Plan should be included as an appendix to the Draft EIR.

Response: This is not necessary since BIO/mm-1 (in conjunction with Table 4G and Exhibit 4D of the Draft EIR) already includes the Programmatic Wetland Restoration Plan.

GOL-48: This comment states that the Draft EIR must include more information about the sensitivity maps and screening process contained in the *Master Archaeological Resources Assessment* (MARA) *for the Santa Barbara Airport*.

Response: Due to the sensitive nature of cultural resources, federal law prohibits such information from being made public.

GOL-49: This comment states that the Draft EIR must include the information that the Santa Barbara General Plan EIR shows soils in the area as having a liquefaction potential.

Response: The Draft EIR (page 4-61, Impact G/HAZ-1) already states that "the Airport has a high potential for liquefaction to occur on-site."

GOL-50: This comment asks for details about the increased gas storage at the Airport fuel farms be provided as well as an analysis of increased risks.

Response: The Master Plan's Facility Requirements chapter (Chapter 4, Table 4L) identifies the Airport's fuel storage requirements, based on a 2-week supply, if the Airport reaches the short, intermediate, and long term planning levels contained in the Master Plan. Based on this analysis, the Airport may need an additional 66,200 gallons of Jet A fuel storage capacity by the long term planning period. Accordingly, the Master Plan recommends that the additional storage be accommodated at the Airport's existing fuel farm. However, this is not a project that is listed in the Airport's Capital Improvement Plan for the 20-year planning timeframe.

Due to the myriad of existing regulations and the implementation of spill prevention control and countermeasure (SPCC) plans at the Airport, this potential increase in fuel storage was found to be Less than Significant within the Initial Study and did not warrant further evaluation at the programmatic level. See also the discussion contained in Impact G/HAZ-3 and Result G/HAZ-3 of the Draft EIR, which reiterates the conclusions of the Initial Study.

GOL-51: This comment states that future development within the regulatory floodway (taxiway extension and fuel farm expansion) and all development within the 100-year floodplain, which covers the entire Master Planning area, cannot be fully mitigated by adherence to the City of Santa Barbara's Flood Plain Management Ordinance.

Response: The City's Flood Plain Management Ordinance mandates a permit for all future structures at the Airport since the Airport is located within the 100-year floodplain. The Ordinance Chapter includes methods and provisions for:

A. Restricting or prohibiting uses which are dangerous to health, safety, and property due to water or erosion hazards, or which result in damaging increases in erosion or in flood heights or velocities;

B. Requiring that uses vulnerable to floods, including facilities which serve such uses, be protected against flood damage at the time of initial construction;

C. Controlling the alteration of natural flood plains, stream channels, and natural protective barriers, which help accommodate or channel flood waters;

D. Controlling filling, grading, dredging, and other development which may increase flood damage; and,

E. Preventing or regulating the construction of flood barriers which will unnaturally divert flood waters or which may increase flood hazards in other areas.

Therefore, there is no reason that future development per the proposed Master Plan will not be fully mitigated to a level less than significant through their adherence to this Ordinance.

GOL-52: This comment states that the Draft EIR should include an in depth discussion of sea-level rise and include how the Airport can adequately mitigate for impacts associated with sea level rise.

Response: Based on recent CEQA case law, the Draft EIR inaccurately characterized flood hazards resulting from global climate change as a project impact. Pursuant to *California Building Industry Association (CBIA) vs. Bay Area Air Quality Management District (BAAQMD) (2015)*, CEQA analysis "is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents" (CBIA, 62 Cal. 4th at 97). The sea level rise analysis has been revised in the Recirculated Draft EIR (Section 4.5.1, *Anticipated Future Sea Level Rise and Hydrological Changes in Goleta Slough* and Section 4.5.4, Result HYD-2c), and is retained for informational purposes only. The proposed mitigation measures to address sea level rise remain as recommended mitigation measures.

GOL-53: This comment states that requiring that the Airport raise building and surface levels to one foot above base flood elevations as sea level rise occurs, which is a measure recommended in the *Goleta Slough Area Sea Level Rise and Management Plan* (2015) (and included in the Draft EIR as HYD/mm-2), must address where the flood waters would go.

Response: This level of analysis is beyond the scope of a Program EIR and is more appropriately evaluated at a project-specific level as projects move forward and additional trends in sea level rise are available.

GOL-54: This comment states that the Land Use section of the EIR must address consistency with the Airport Industrial Area Specific Plan.

Response: See response to comment **GOL-3**. The City of Santa Barbara Planning staff has determined that the proposed Master Plan does not represent an inconsistency with the SP-6 Plan land use map, zoning, or policies.

GOL-55: This comment states that the proposed Master Plan is not consistent with the City of Santa Barbara's Climate Action Plan and its greenhouse gas emission reduction strategies for the Airport.

Response: See response to comment **GOL-44**. The Santa Barbara Airport has an entire plan dedicated to reducing its carbon footprint (i.e., the 2007 *Santa Barbara Airport Greenhouse Gas*

Inventory and Carbon Footprint Reduction Plan), which includes the installation of 350 KW solar Photo Voltaic (PV) cells on a roof canopy used to cover cars in the Airport's long term parking lot. This type of project is not suitable for placement on the overall development concept plan of an Airport Master Plan, however, which provides a guide to ensure that the Airport is prepared to handle forecast future growth in an efficient and safe manner and shows general land uses, airside elements, and landside buildings and pavement.

The proposed Master Plan does incorporate centralized locations for the terminal and fixed base operations by locating all terminal parking facilities in proximity to the terminal and relocating all fixed base operations to the north side of the Airport, which are two other reduction strategies mentioned in this comment.

GOL-56: This comment states that a runway extension project may not meet the CCC's test for categorizing the extension as an "incidental public service" because it is not necessary to *maintain* the existing capacity of the Airport, only make it more efficient, and, therefore, LCP policy conflicts must remain as Class I, Significant Environmental Impact.

Response: This response assumes that the commenter meant the proposed Taxiway H Airfield Safety Project, since the proposed Master Plan does not include an extension of any runways. The Draft EIR makes the conclusion that the proposed Master Plan does not conflict with any LCP policies. This statement is true since no construction or ground disturbance will result from the adoption of the planning document.

Future projects recommended in the Master Plan, such as the Taxiway H Airfield Safety Project, may require an LCP amendment to move forward. The final approval of projects within the Coastal Zone rely on the merits of the project, as designed, and rely on the Coastal permitting process to ensure that significant impacts do not occur. This process will also make the determination of whether or not a proposal meets the CCC definition of an "incidental public service." The Draft EIR includes programmatic mitigation measures, which will be incorporated into applicable projects, that are consistent with coastal permitting procedures for the Slough in the past.

GOL-57: This comment states that a more comprehensive analysis of the City of Santa Barbara General Plan, Airport Zoning Regulations, and Airport Industrial Area Specific Plan is necessary.

Response: The Draft EIR addresses applicable City of Santa Barbara General Plan policies in each section of Chapter Four. The Land Use section is focused on those General Plan policies specific to the Airport, e.g., Airport LCP policies not covered in the Biology section of the EIR.

A thorough analysis of the zoning regulations cannot be conducted at the planning level, but will be required for individual projects prior to the issuance of building permits. However, the Draft EIR does address at a programmatic level the need to rezone part the G-S-R zone to A-A-O if the

Taxiway H Airfield Safety Project moves forward. Additional analysis of this specific project will occur at the time of project design and approval. See also Recirculated Draft EIR, Section 4.6.4, Impact LU-6.

See response to comment **GOL-3** regarding the consistency of the Master Plan with the SP-6 Plan. See Recirculated Draft EIR, Section 4.6.4, Impact LU-3.

GOL-58: This comment states that the impacts of a proposed lavatory dump station in the southeastern portion of the Airport must be included in the Draft EIR.

Response: Environmental impacts of the proposed Master Plan are indirect and are related to future physical changes proposed at the Airport for safety and efficiency purposes. These impacts can only be evaluated at a programmatic level within the Draft EIR since none of the individual Plan recommendations have been designed. As individual development projects are proposed and funding becomes available, more detailed environmental analysis will occur, as appropriate, based on preliminary project design. See also response to comment **GOL-51** regarding flood plain issues and the role that the City of Santa Barbara's Flood Plain Management Ordinance and permitting procedures play in ensuring that significant flood-related impacts do not occur.

GOL-59: This comment states that the Draft EIR must include more discussion of the County's Congestion Management Program (CMP).

Response: The Draft EIR (and Recirculated Draft EIR) discuss the County CMP in Section 4.8.2, *Applicable Plans and Policies,* as well as in Sections 4.8.4 and 4.8.5 under the impact discussions. Based on this analysis, implementation of the proposed Master Plan would contribute cumulative traffic to roadways and intersections within the CMP network. However, implementation of the Master Plan will not cause CMP intersections to operate below a LOS D.

GOL-60: This comment states that the Draft EIR does not explain why new projects identified in the proposed Master Plan are not considered to have a potential impact on traffic, e.g., four new revenue support parcels, new T-hangars, and a new restaurant/conference center.

Response: A new restaurant/conference center is no longer part of the proposed Master Plan (refer to the Recirculated Draft EIR, Exhibits 2B and 2E). Other proposed re-development on the north side of the Airport, e.g. new T-hangars and revenue support parcels, are currently developed with existing office and R&D buildings that generate traffic in the existing condition. While future development may have more or less traffic than currently exists, it is not feasible to evaluate the difference at a planning level with no actual development proposals. Instead, the City of Goleta's traffic model was used to predict future traffic levels in the study area, which

took into account not only future growth rates for the City of Goleta, but also for the Airport based on forecast activity levels.

GOL-61: This comment states that the Draft EIR did not include City of Santa Barbara projects in the vicinity of the Airport.

Response: Comment noted. The Recirculated Draft EIR has been revised to include both updated City of Goleta and City of Santa Barbara projects within the project study area.

GOL-62: This comment states that the Draft EIR assumes both the Ekwill and Fowler Road extensions by the Year 2022, but that the analysis should also be run without these projects since they have not yet been approved.

Response: Comment noted. The Recirculated Draft EIR and revised Traffic Impact Study includes the future extension of Ekwill Road in the years 2022 and 2032 as a planned roadway improvement. However, it is not likely to be used for traffic resulting from Master Plan implementation, which primarily involves FBO trips being redistributed from south of the Terminal to the north side of the airfield. The extension of Fowler Road is not included as its proposed location within a runway protection zone makes it less feasible.

GOL-63: This comment states that there are additional traffic mitigation measures that the City of Santa Barbara can implement, such as diverting traffic from entering Hollister Avenue from on-airport roads west on to Hollister Avenue.

Response: The Airport cannot restrict the access of future development on the Airport's north side without project-specific studies to address emergency access, flow of traffic, and other design issues. In addition, there is a fire station located on the north side of the Airport that needs unrestricted access to its property.

GOL-64: This comment states that there are additional traffic mitigation measures that the City of Santa Barbara can implement, such as constructing an overpass/on-ramp within the City of Santa Barbara-controlled Airport Industrial Area.

Response: This type of mitigation measure would have regional ramifications and would need to be included within the County of Santa Barbara's Regional Transportation Plan as well as have approval from the California Department of Transportation (Caltrans). One issue would be its distance from the existing on-ramp at Fairview Avenue. As stated in the Draft EIR (Section 4.8.7), the already planned La Patera overcrossing would provide adequate mitigation for cumulative traffic; the City of Santa Barbara will pay its "fair share" cost allocation based on adopted mitigation fee programs if, or when, it is constructed.

GOL-65: This comment states that there are additional traffic mitigation measures that the City of Santa Barbara can implement, such as providing a shuttle/bus service between the Amtrak Station and the Airport Terminal.

Response: This measure, while potentially improving airport-related traffic, cannot be used to mitigate traffic impacts of adopting the proposed Master Plan. Those impacts are related to the relocation of an FBO from the south side of the Airport to the north.

GOL-66: This comment opines that the Draft EIR stating there are no possible mitigations to the Class I traffic impact is unacceptable.

Response: The Draft EIR does not state that there are no possible mitigations, but includes a reasonable range of traffic mitigation measures. However, the bottom line is that due to the cumulative traffic situation expected to occur in the long term planning scenario, traffic due to the relocation of an FBO from near the terminal to the north side of the Airport will redirect a small amount of peak hour trips through intersections that will eventually experience unacceptable LOS. Both the City of Goleta and City of Santa Barbara's significance thresholds only take into account measurable traffic improvements that reduce LOS. Therefore, the project's cumulative impact must stay as Class I until such time that the actual LOS can be improved.

GOL-67: This comment states that an agreement with the City of Goleta to pay a fair-share allocation of future intersection improvements should be included as a mitigation measure for Impact T-3.

Response: The Draft EIR discusses traffic impact fees under Result T-3. This discussion has also been added to the Recirculated Draft EIR in the Mitigation Measure section (4.8.7).

GOL-68: This comment states that Chapter Five, Other CEQA Sections should be updated based on the City of Goleta's comments.

Response: Chapter Five of the Recirculated Draft EIR has been updated, as appropriate, based on the Recirculated Draft EIR text revisions.

GOL-69: This comment states that the Draft EIR only includes one alternative in addition to the No Project Alternative, which does not provide a "reasonable range of alternatives to consider other ways to achieve some or all of the project objectives."

Response: As the environmental analysis was completed, several aspects of the proposed Master Plan that were likely to create significant environmental impacts were removed from the project, making the proposed project itself more environmentally sensitive, and reducing the need for additional alternatives to solve the identified problems. This is, ideally, the way the environmental review process is supposed to work. The Draft EIR summarizes this process in Sections 3.1 and 3.2, including a summary of the lengthy alternatives process that was conducted as part of the Master Plan itself (Chapter 5), which identified and then looked closely at ways to accomplish the project objectives. The alternatives carried through the Draft EIR analysis address the remaining environmental concerns associated with the project as proposed, i.e., impacts to Goleta Slough (Environmentally Superior alternative) and cumulative traffic (No Project alternative).

GOL-70: This comment states that the Draft EIR must provide an alternative, other than the No Project alternative, that lessens identified cumulative traffic impacts.

Response: The proposed Master Plan is focused on safety improvements within the airfield, which do not generate traffic, and the redevelopment of the north side. Because the north side already generates traffic and details of the future uses are, for the most part unknown, this future traffic is best captured within the overall Airport growth rates that are already part of the Goleta's traffic model (i.e., the model assumes light industrial land uses for the north side and this land use will not change as a result of the proposed redevelopment). The traffic impacts associated with the proposed Master Plan are, therefore, associated with the proposed relocation of one FBO from south of the terminal to the north side. The only alternative to this is the No Project alternative.

GOL-71: This comment states that Table 6A, Impacts T-2 and T-3, should not include references to construction traffic.

Response: Comment noted. These references have been removed in the Recirculated Draft EIR.

GOL-72: This comment requests that an FAA Local Runway Safety Action Plan be included within the EIR appendices to provide clearer details on the necessity of extending Taxiway H to address safety and circulation issues.

Response: Comment noted. This memo has been included as Appendix A of the Recirculated Draft EIR.

GOL-73: This comment states that the City has several concerns about the methodology and analysis of traffic impacts (as specified in comments GOL-74 through GOL-78.

Response: See responses to comments **GOL-74** through **GOL-78**.

GOL-74: This comment states that a more detailed discussion of the project description is needed to provide details regarding the FBO facilities.

Response: An FBO is a commercial business granted the right by an airport to operate on the airport and provide aeronautical services such as fueling, hangars, tie-downs and parking, aircraft rental, aircraft maintenance, flight instruction, etc. Existing FBOs at the Airport include Signature Flight Support (9,760 sf) and Atlantic Aviation (3,400 sf). Services provided by these two businesses include general aviation terminal service, flight planning facilities, a pilot's lounge, conference room, passenger lounge, and restrooms.

The traffic analysis conducted traffic counts at the existing Atlantic Aviation driveways and used these counts to determine trip generation factors that were then proportionately extrapolated to determine traffic associated with future general aviation activity at the Airport based on the Master Plan projections. It should be noted, however, that FBO trips and associated activity is limited more by airport traffic operations than by the size of the facility.

GOL-75: This comment states that the Existing Conditions Peak-Hour Intersection LOS analysis has values that are too low for several of the intersections within the study area.

Response: Traffic volumes for intersections under study were initially collected during the summer of 2014 and then were recollected on April 2, 2015 when UCSB was in session. Since US 101 ramp construction was ongoing throughout the study period, April 2 was chosen for data collection, based on information provided by Goleta regarding the schedule of construction, because only one of the ramps (the northbound Fairview Avenue on-ramp) was closed on this day. Traffic volumes for this ramp was based on an April 2013 count from the City of Goleta's Marriott Final EIR. No additional data collection is necessary.

GOL-76: This comment states that the methodology for dividing project trips between north and south should be included and that the analysis should include how trip generation would change without the Ekwill and Fowler Road extensions.

Response: Since the Airport is comprised of two distinct areas – the north side along Hollister Avenue and the south side terminal area – the methodology for deciding which trip distribution to use was simply based on the location of the trip generating land use. Based on this and other comments, the Recirculated Draft EIR contains an updated traffic impact study that contains an analysis of cumulative traffic conditions without the Fowler Road extension, which is the improvement that would affect airport-related traffic. It should be noted, however, that whether or not Fowler Road is extended has no bearing on trip generation at the Airport, only trip distribution.

GOL-77: This comment states that the traffic counts used should provide more detail as to what type of vehicle entered and exited the various Airport facilities, and that traffic counts to determine ins and outs at the entrance and exit of the existing terminal should have been performed.

Response: Trip distribution is an estimation of how vehicles would access the project site and takes into account for the various vehicles. Though helpful in a detailed analysis, vehicle classification for purposes of this planning study was not considered to be necessary. Traffic counts at the various Airport ingress and egress points were collected and was provided in an appendix to the traffic impact study report.

GOL-78: This comment states that the SYNCHRO analysis performed must be redone with different parameters for Intersection Capacity Utilization (ICU) approach consistent with the Santa Barbara County Association of Governments' (SBCAG) CMP.

Response: The Recirculated Draft EIR contains an updated Traffic Impact Study (Appendix D) that uses the City of Goleta's preferred traffic analysis software, TRAFFIX. It also utilizes the 1,600 vph saturation flow rates with a 10% lost time convention adopted by the City of Goleta and consistent with the SBCAG's CMP.

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October 30, 2015

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

RE: Airport Master Plan Draft EIR

Dear Mr. Bermond,

Please accept the following comments on the Draft Environmental Impact Report (DEIR) for the Santa Barbara Airport Master Plan (AMP), which are hereby submitted by Santa Barbara Channelkeeper. SBCh1

Santa Barbara Channelkeeper is a local non-profit environmental organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds through science-based advocacy, education, field work and enforcement. SBCh1

Channelkeeper is particularly concerned about the potential adverse environmental impacts of the project to expand Runway H which is included as part of the AMP. The AMP needs to clarify that the adoption of the AMP does not indicate approval of specific projects (particularly the expansion of Runway H), nor exempt individual projects that are part of the AMP from separate and full environmental review. SBCh2

In addition, the impacts from the proposed runway expansion should be more thoroughly analyzed in the AMP, as the existing analysis is inadequate. As currently drafted, the DEIR bases most findings of impacts on an extremely limited biological study. It is clear that a far more robust analysis is needed in order to accurately assess the potential environmental impacts. SBCh3

Channelkeeper also recommends that the airport increase their proposed mitigation ratio to a minimum of 4:1, as much of the environment that will be impacted is sensitive wetland or important habitat, and the mitigation ratio currently proposed would be inadequate to truly mitigate the impact. SBCh4

Thank you for the opportunity to comment on the DEIR for the Airport Master Plan; we appreciate your attention to the issues and concerns we raise and trust you will address them before certifying the EIR. Please feel free to contact me via email at kira@sbck.org or telephone at 805.563.3377 ext.1 should you have any questions.

Sincerely,

Kira Redmond, Executive Director

WATERKEEPER® ALLIANCE MEMBER
CALIFORNIA COASTKEEPER ALLIANCE

Response to Letter 9
Santa Barbara Channelkeeper (SBCh)
Dated October 30, 2015

SBCh-1: This comment provides information on the Santa Barbara Channelkeeper's mission.

Response: Thank you for your comments.

SBCh-2: This comment states that there is a concern about the expansion of Runway H, and that the Airport Master Plan needs to clarify that the adoption of the Airport Master Plan does not indicate approval of specific projects, nor exempt them from environmental review.

Response: The Airport Master Plan does not recommend the expansion of any runways. It does recommend the extension of a taxiway (Taxiway H Airfield Safety Project) to the end of the existing runway for safety purposes. The Airport Master Plan contains an Environmental Overview (Appendix B), in which future environmental review of recommended Master Plan projects is discussed (see Appendix B, Part 2 – Environmental Evaluation). In addition, the Draft Environmental Impact Report states in several places, including the Executive Summary (ES3.0, Required Discretionary Actions and Other Agency Approvals), that "Future projects recommended in the Master Plan would require discretionary approvals at the time they are ready for implementation" and specifically refers to the Taxiway H Airfield Safety Project.

SBCh-3: This comment states that the impacts from the proposed runway expansion should be more thoroughly analyzed, and that a more robust analysis is needed.

Response: Again, the Airport Master Plan does not recommend the expansion of any runways (see response to comment **SBCh-2**). The current EIR effort is not meant to fully assess the impacts of a Taxiway H Airfield Safety Project, but rather is a programmatic assessment of an airport planning document. As such, the survey efforts undertaken in support of the Master Plan have identified the potential for wetland impacts and have provided the framework for future mitigation efforts. As identified in the CEQA Guidelines Section 15168(b)(4), one advantage of a program EIR is to "allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." As stated throughout the Draft EIR, additional, in-depth, analysis will be required before the Taxiway H Airfield Safety Project could be approved.

SBCh-4: This comment recommends that the Airport increase the proposed mitigation ratio for the Taxiway H project to a minimum of 4:1 and states that the project will impact sensitive wetlands or important habitat.

Response: This comment states that the Taxiway H Airfield Safety Project would be located within existing wetlands or important habitat. As discussed in Section 4.2.4, Impact BIO-1 of the Draft EIR (as well as Appendix C and D), the primary habitat located in the area of the proposed Taxiway H Airfield Safety Project is disturbed annual brome grassland that is composed primarily of non-native grasses, broad-leaf forbs, and noxious weeds, rather than wetlands. However, as stated in the Draft EIR text, depending on the amount of rainfall, this area may also function as an intermittent wetland area. Therefore, a detailed mitigation program that meets the parameters of the Programmatic Wetlands Restoration Program contained in the Draft EIR (and as revised by the California Department of Fish and Wildlife [CDFW] and included in the Recirculated Draft EIR) will be required as a condition of approval if the proposed Taxiway H Airfield Safety Project moves forward.

Santa Barbara Audubon Society
A Chapter of the National Audubon Society
P.O. Box 5508
Santa Barbara, CA 93150
www.santabarbaraaudubon.org

October 30, 2015

City of Santa Barbara Planning Division
Attention: Andrew Bermond, AICP
P.O. Box 1990
Santa Barbara, CA 93102-1990
ABermond@SantaBarbaraCA.gov

RE: Comments on Draft Airport Master Plan Environmental Impact Report

Santa Barbara Audubon Society (SBAS) is a chapter of the National Audubon Society with approximately 1100 members in the Santa Barbara area. The mission of SBAS is to help conserve and restore the earth's natural ecosystems and improve its biological diversity, principally in the Santa Barbara area, and to connect people to birds and nature through education, science-based projects and advocacy.

SBAS has long been involved in the Goleta Slough ecosystem, providing representatives to the Goleta Slough Management Committee, spearheading and participating in restoration projects within the Slough, and leading outreach activities in the Slough ecosystem. Many of our members frequently use Goleta Slough (GS) for their recreational activities. We appreciate the opportunity to offer comments on the Draft Airport Master Plan (AMP) Environmental Impact Report (DEIR). AUD1

General Comments

In general, SBAS finds that the DEIR does not establish the need for the projects outlined in the DEIR, uses outdated and incomplete information to draw conclusions about the impacts of proposed projects, and has not provided a convincing or rigorous analysis of the environmental impacts of the projects proposed in the AMP. As a consequence, many of the DEIR's conclusions about the levels of impact are unwarranted.

Because the new, expanded Airport, opened in 2011, has excess capacity, operating at 48% of annual service volume, the projects outlined in the DEIR are justified on the basis of increases in Airport safety and efficiency. However, there is little quantitative analysis of the effects of the AMP on Airport efficiency or safety and no quantitative forecasting of the need for the terminal or parking lot expansions. AUD2

The DEIR also contains no analysis of the effects of the proposed expanded fuel farm on the environment or safety, or on the environmental impacts of north side developments on San Pedro Creek. AUD3

DEIR is inadequate in addressing AMP impacts on physical and chemical conditions in Goleta Slough and in considering the consequences of climate change and sea level rise

Many of SBAS's concerns about the DEIR, however, revolve around the inadequacy of its analysis of AMP impacts on native species, communities, and habitats. In the latter case, the AMP calls for changes in the distribution and amounts of paved or disturbed surfaces in the Airport area. Not only will this development destroy or re-arrange habitat, it will result in effects on the hydrology, sediment dynamics, geomorphology, and water quality of GS with many repercussions for its native biota.

The DEIR, however, contains no quantitative analysis of the effects of the AMP on physical and chemical factors, and habitats, within the Slough. Although the DEIR also states that such impacts will be mitigated through adherence to current policies and the use of best management practices (BMPs), the description of BMPs is vague and the effectiveness or sufficiency of mitigation practices cannot be evaluated. AUD4

Despite the completion of the Goleta Slough Area Sea Level Rise (SLR) and Management Plan, the DEIR does not include much of the information or conclusions in that document. Prescriptions for dealing with sea level rise are vague and sketchy, and insufficient detail is provided to determine if they would be effective. AUD5

DEIR is inadequate in addressing information establishing the natural resources and native species found in the Goleta Slough ecosystem so that AMP impacts on these resources and species can be evaluated

Just as a Master Plan presents long-range ambitions for the Airport, so should resource assessments present a broad view. The Master Plan should present information that allows analyses of changes to natural resources occurring since previous Master Plans going back to the early 1980s. This would allow reviewers and decision-makers the opportunity to assess the effectiveness of mitigations executed in conjunction with previous Plans. If some mitigation objectives were not met in the past, perhaps those are opportunities for actions associated with this Plan. Only a large-scale, historic resource assessment can lead to a constructive prioritization of resource recovery objectives for this AMP. AUD6

The resource assessments are inadequate.

Inadequacies in Goleta Slough resource characterizations occur at several levels:

1. The DEIR omits areas beyond the study area that are critical to understanding the resources within the study area. Nearby areas, such as UCSB, the mouth of GS, Goleta Beach, More Mesa, and creeks that feed GS, are all used by and affect native species that also use GS. Although surveys in these areas might not be expected, bringing these areas into the analysis should have been accomplished through literature review and consultation. AUD7
2. Species accounts omit historical data and trends that would be useful to determine impacts and appropriate design mitigations. AUD8
3. Minimal period for survey data collection (primarily Feb-March in 2012, a dry year). Also, the consultants state that the survey protocols they used were not standard and they relied on only 24 sites within a large area for wetland delineations. AUD9

4. Restricted access to the study area. The DEIR p. C-19 states: "Dudek was able to access the perimeter of select airfield areas to characterize vegetation and wildlife habitat on a broad scale. Therefore, these areas are included within the [Dudek] study area." It is difficult to characterize whole areas through sampling at their peripheries. AUD10
5. Information in the "Existing Conditions Report" from 2013 prepared for the airport by the Goleta Slough Management Committee was cited, but there was little or no integration of information from the Goleta Slough Mouth Management Biological Technical Report, the Goleta Slough Area Sea Level Rise and Management Plan, CCBER archives, or appropriate local experts. AUD11
6. Some species accounts are inaccurate and incomplete. The DEIR cites *The Birds of Santa Barbara County, California* (Lehman 1994) for bird species accounts, but fails to draw on new information that has been readily available through 2015. Updated versions are found at (https://sites.google.com/site/lehmanbosbc/). AUD12
7. The DEIR's and Appendix C's accounts of aquatic invertebrates and fish are riddled with errors, appropriate sources (e.g., NMFS, USFWS, and CDFW) were not consulted, and important literature was not reviewed. AUD13
8. Difficult access protocols discourage legitimate access to the slough. This has been an obstacle for many legitimate researchers over the years and is highlighted in the dEIR p. C-19: " . . . due to security concerns and additional trainings and authorizations, Dudek did not obtain access to portions of the airfield". AUD14
9. Well in advance of the preparation of the AMP, individuals and the GSMC have urged studies and monitoring programs for natural resources in GS, but such studies have not been completed, although they would be essential for forecasting the effects of the AMP. AUD15
10. A critical omission is any presentation of the interactions among plants, animals, and their abiotic environments in the GS ecosystem.

This last omission is important because the DEIR needs to recognize how these elements contribute to a network that accounts for the complex relationships within GS. In addition, we emphasize that any functioning estuary is composed of a mosaic of habitats that are used by different, interacting species at different times, so a prescription for protecting a healthy GS ecosystem entails protections or restoration of the varied habitats that were originally present. AUD16

The cumulative effect of all the constraints and omissions listed above contribute to a document that does not satisfy minimum requirements for disclosure under CEQA. (In contrast, the first Master Plan prepared for the Airport in the early 1980s provides an interesting assessment of the richness of the resources of GS.)

Biological Surveys are Inadequate

The DEIR acknowledges (App. C-19): "Surveys restricted to mid-Feb to mid-March, did not coincide with the survey window for most special-status wildlife species or the blooming period for special-status plant species occurring within the Airport. Therefore, for most species, the combination of a literature review and a habitat analysis based on vegetation community mapping *is the best method* for determining where special-status species occur within the slough." AUD17

SBAS suggests that the italicized wording be changed to read " . . . *is the remaining method chosen* . . . " Other options to portray the vertebrate species present would have been to make

more comprehensive use of the Existing Conditions report prepared by the GSMC in 2013, use the CCBER Field Note Archive, use recent studies commissioned by the Airport (e.g., the Goleta Slough Mouth Management Biological Technical Report), and consult additional local experts. AUD17 cont'd

Specific concerns in the Species Accounts

We have numerous concerns about the DEIR's (including Appendices C and D) accounts of the presence and status of native species and communities present in GS. As outlined above, the accounts of aquatic species and communities are incomplete, inaccurate, or fragmentary, and the DEIR would have benefited from additional consultation with appropriate experts. Additional consultation with CDFW and NMFS personnel and documents would have improved the account for the southern California steelhead. AUD18

Although the consultants refer to the URS reports on tidewater gobies, no maps of the past distributions of this species are presented. Red-legged frogs have been recorded from Maria Ygnacio and San Jose Creeks, and may be found in other streams draining into GS. There is little or no analysis of the impacts of the AMP on these listed species, particularly the fish species.

Here, however, we concentrate primarily on bird species, given our expertise and the focus of our organization.

White-tailed Kite. The protected status of this species by the County LCP is not mentioned. The account errs in suggesting that the species has been rebounding since the 1990s. The reference 'Holmgren 2011' does not indicate a rebound. Overall, we find fewer breeding pairs since 1997, and almost no breeding success in drought periods. Although highly able to recolonize following population declines, fewer kite pairs have been nesting in the GS Study Area over the years (SBAS White-tailed Kite Watch Program). However, the DEIR also errs in understating the importance of GS as habitat for the breeding population that remains. In non-drought years, from 1 to 3 pairs of kites set up each winter in the GS Ecosystem with a show of intent to breed. Adult kites use the diverse and connected habitats within GS at some time during their breeding effort. AUD19

American Bittern. The account should add that ample habitat to support breeding exists in Area J. For lack of survey effort, we do not know when or if the species occurs there, or elsewhere, in GS. One could look at the hydrology of Area J and propose mitigations that might promote its presence in that area.

Black-crowned Night-Heron formerly roosted along the southern edge of GS where oak woodland dominated (Rett1941). AUD20

Burrowing Owl was formerly found on GS annually in winter. Certainly this species formerly bred on the Slough, which should be stated in the account.

California Horned Lark: A locally rare species The DEIR account mentions that nesting formerly occurred near Airport runways and taxiways. The account for this species does not mention that the proposed Taxiway H encompasses areas formerly used by this species nor does it mention that these areas represent the last remaining breeding sites for this species along the South Coast. When biologists have specifically looked for this species, they have found it in GS. For example, a UCSB team sighted 17-20 Horned Larks along Airport runways and taxiways on AUD21

30 June 1995 and documented and mapped three breeding events in a note set from that date (see the CCBER Field Note Archive). The team also salvaged a dead juvenile Horned Lark apparently flattened by the tire of a small airplane. In this and previous airport documents, Airport impacts on Horned Larks have not been assessed; no avoidance measures have been proposed for grassland areas surrounding the runways and taxiways; and no mitigations to offset impacts from projects, such as runway or taxiway extensions or wildlife control in these short grassy areas have been discussed or proposed.

The DEIR fails to recognize the precarious status of this species and the importance of its habitats near runways and taxiways. Although the species represents no threat to aircraft, aircraft are a direct threat to this breeding population. The EIR should include discussion of threats to this last local Horned Lark population and the nexus with the proposed Taxiway H.

AUD21 cont'd

California Least Tern account errs in not citing recent sources of data that show they nested at Coal Oil Point Reserve in two recent years, fledging seven chicks in 2006. Their historical nesting there and at Goleta Beach at least through the late 1930s is certain, not probable (Seasonal Use of COPR Snowy Plovers.pdf in the CCBER Field Note Archive). The DEIR states: "No suitable nesting habitat is present in the study area." This statement is incorrect. Suitable habitat exists at the GS mouth, but breeding does not due to intense use from human activities.

Post-breeding use. We do not have sufficient information from GS to evaluate its use by juveniles dependent upon adults in July and August when they migrate through this area. Likely areas where this use almost certainly does occur is in the tidal channels of GS, because such behavior is seen on the beach and in the estuary at COPR.

AUD22

Cooper's Hawks not only "have the potential to nest" in the study area, they *have* nested in the oaks bordering UCSB and in the *Eucalyptus* and willows between Areas K and J. Individuals from nesting sites just outside of the study area (More Mesa, Gas Plant Property) frequently forage within the study area.

AUD23

Double-crested Cormorant formerly and currently roost in trees along the Campus Lagoon and, since ~2008, have nested at the Goleta Sough mouth. SBAS recorded 22 active nests in 2012 and as many as 60 nest structures in 2013.

Grasshopper Sparrows nest near the study area on More Mesa. Nesting has been documented in several years, including 2015.

Great Blue Heron account misses entirely the relationship of GS to the nesting rookery at Goleta Beach.

AUD24

Great Egret	SW Willow Flycatcher
Least Bittern	Snowy Plover
Loggerhead Shrike	Tricolored Blackbird
Northern Harrier	Yellow Warbler
Peregrine Falcon	Yellow-breasted Chat
Short-eared Owl	Yellow-headed Blackbird

AUD25

To limit the amount of space devoted to this response, we will not provide detailed information

AUD26

on these and other species. Instead, we urge City and Airport officials, and their consultants, to consult additional documents and experts, as outlined above. AUD26 cont'd

Mitigations are Inadequate

Without a clear, complete, and accurate inventory of the natural resources, including native species and communities, present in GS, and a clear characterization of the natural processes occurring in the Slough (sediment dynamics, hydrology, water quality), it is not possible to determine the environmental impacts of the AMP. AUD27

Even where mitigations are proposed, their descriptions are so vague as to defy a clear evaluation of their effectiveness. As mentioned above, the proposed mitigations for SLR are very imprecise and do not dovetail with existing information on SLR impacts. BMPs are either not or unclearly defined, so an evaluation of their effectiveness is not possible. AUD28

The DEIR needs additional analysis of the congruence of some AMP components, such as the Taxiway H extension, with local, state, and federal policies, laws, and regulations, including but not limited to the Coastal Act, SB LCP, updated GSEMP, CWA, ESA, and CESA. Although the DEIR states that the Taxiway H extension will be subjected to a project-specific environmental analysis, it is part and parcel of the AMP and its impacts need to be thoroughly evaluated as part of the AMP environmental impact analysis. AUD29

Further, the Programmatic Wetland Restoration Plan (PWRP) is key for evaluating the effectiveness of mitigation efforts and is required for approval of the AMP, so should be included in the EIR so that proposed mitigation efforts can be properly evaluated. Although the DEIR identifies 30 acres within GS for on-site mitigation efforts, it is not clear if this will be sufficient to mitigate habitat losses accruing from projects proposed in the AMP (e.g., 12.4 A with the Taxiway H extension), particularly if Coastal Zone wetland mitigation ratios of 3 or 4 to 1 are used. AUD30

Finally, SBAS, with CDFW, is particularly concerned with the current perimeter fence, which inhibits wildlife movement into and out of the Slough. The DEIR defers a decision on the perimeter fence until a wildlife hazards analysis is completed but, because the fence is part of the Airport's infrastructure, the DEIR should include at least the steps and timeline for completing this hazards analysis, evaluating possible mitigation measures, soliciting public comments, and effecting any changes. AUD31

Conclusion

SBAS views the DEIR for the Airport Master Plan to be premature and inadequate. The AMP does not provide a detailed analysis of the need for the proposed projects. The DEIR's inventory of natural resources is incomplete and inaccurate, possible mitigations are not or vaguely described, and, as a consequence, environmental impacts cannot be assessed. Conclusions regarding the AMP's impacts (e.g., Class II for BIO 1 and 2 and HYD 1 and 2) are totally unjustified.

SBAS recommends that the Airport Master Plan process be suspended until such time as the airport honors the requirements of CEQA and the Coastal Act to provide adequate information on which to make decisions. AUD32

Sincerely,



Cherie Topper, Executive Director
Santa Barbara Audubon Society
Director@SantaBarbaraAudubon.org

Response to Letter 10
Santa Barbara Audubon Society (AUD)
Dated October 30, 2015

AUD-1: This comment identifies the commenter's mission and history with the Goleta Slough Management Committee.

Response: Thank you for your comment.

AUD-2: This comment states that the Draft EIR does not establish the need for the projects outlined in the document and uses outdated and incomplete information. It also states that the new, expanded Airport was opened in 2011, has excess capacity, and that there has not been quantitative forecasting of the need for terminal and parking lot expansions.

Response: The size and capacity of an airport is a function of its runway system, not its terminal or other landside facilities. In this case, the Airport's runway system has not been expanded, and the primary runway has remained at a static 6,052 feet long since 1975. The draft Master Plan contains extensive quantitative forecasting of future airport operations, which in turn, drive future need for landside improvements such as terminal or parking lot expansions. However, adoption of the Master Plan does not mean that these improvements will necessarily occur. They will only move forward, if and when, demand has increased and funding is available. All Master Plan projects will be subject to further environmental review and compliance under the *National Environmental Policy Act* (NEPA) and/or the *California Environmental Quality Act* (CEQA), as well as all other applicable environmental laws and regulations.

AUD-3: This comment states that the Draft EIR does not analyze the effects of the proposed expanded fuel farm or north side development on San Pedro Creek.

Response: Comment noted. The Recirculated Draft EIR includes discussion of potential indirect impacts to nearby creeks in Section 4.2.5, Impact BIO-3.

AUD-4: This comment states that the Draft EIR is inadequate in the level of detail it provides in analyzing impacts on the physical and chemical conditions in Goleta Slough.

Response: The current EIR effort is not meant to fully assess the impacts of individual projects, but rather is a programmatic assessment of an airport planning document. As such, the survey efforts undertaken in support of the Master Plan have identified the potential for biological or hydrological impacts and have provided the framework for future mitigation efforts. As identified in the CEQA Guidelines Section 15168(b)(4), one advantage of a program EIR is to

"allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." The Draft Environmental Impact Report explains in several places, including the Executive Summary (ES3.0, Required Discretionary Actions and Other Agency Approvals), that "Future projects recommended in the Master Plan would require discretionary approvals at the time they are ready for implementation." As discussed previously in response to comment **AUD-3**, all Master Plan projects will be subject to further environmental review and compliance under the NEPA and/CEQA, as well as all other applicable environmental laws and regulations.

AUD-5: This comment states that the Draft EIR does not include enough information from the Final *Goleta Slough Area Sea Level Rise and Management Plan*.

Response: Based on recent CEQA case law, the Draft EIR inaccurately characterized flood hazards resulting from global climate change as a project impact. Pursuant to *California Building Industry Association (CBIA) vs. Bay Area Air Quality Management District (BAAQMD) (2015)*, CEQA analysis "is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents" (CBIA, 62 Cal. 4th at 97). The sea level rise analysis has been revised in the Recirculated Draft EIR (Section 4.5) and is retained for informational purposes only. The proposed mitigation measures to address sea level rise remain as recommended mitigation measures. The *Goleta Slough Sea Level Rise and Management Plan* document was finalized following the preparation of the Draft EIR. In response to this and other similar comments, it has been incorporated by reference into the Recirculated Draft EIR.

AUD-6: This comment states that the Master Plan should present information that allows analyses of changes to natural resources occurring since previous Master Plans going back to the early 1980s, allowing the assessment of the effectiveness of previous mitigations.

Response: The analysis requested in this comment is beyond the scope of this Master Plan and EIR effort; however, much of what is requested has been included in the recently completed *Goleta Slough Sea Level Rise and Management Plan.* In response to this and other similar comments, it has been incorporated by reference into the Recirculated Draft EIR.

AUD-7: This comment states that the Draft EIR should include a larger study area than just the Goleta Slough.

Response: The analysis requested in this comment is beyond the scope of this Master Plan and EIR effort. Projects recommended in the Master Plan are located within the developed areas of the Airport already covered by existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks.

AUD-8: This comment states that the Draft EIR should include historical trends in the species accounts to determine impacts and appropriate design mitigations.

Response: The analysis requested in this comment is beyond the scope of this Master Plan and EIR effort. Impacts to at-risk species are monitored and regulated at a regional, statewide, and nationwide level by resource agencies with the responsibility for monitoring species trends and providing suitable mitigation.

AUD-9: This comment states that the resource assessment is inadequate due to the minimal periods used for survey data collection.

Response: Additional project-specific surveys, which will be used for developing a detailed mitigation program, will be required at the time that the Taxiway H Airfield Safety Project moves forward. This EIR is a programmatic EIR and is not intended to provide the level of detail necessary to approve or evaluate specific impacts of any particular development project recommended within the Master Plan. As such, a one-season survey is adequate to provide an indication of when, and where, additional project-specific surveys will be necessary.

AUD-10: This comment states that resource assessments are inadequate due to restricted access to the study area.

Response: See response to comment **AUD-9**. Additional project-specific surveys, which will be used for developing a detailed mitigation program, will be required at the time that the Taxiway H Airfield Safety Project moves forward. At that time, Airport staff will provide the escorts necessary to allow access to the affected study areas. Most other recommended Master Plan projects are located within the developed portions of the Airport and are not likely to need detailed biological surveys.

AUD-11: This comment identifies other existing condition information that they feel should have been integrated into the EIR resource assessments.

Response: The City of Santa Barbara feels that the amount of information provided in the EIR, in conjunction with appropriate resource agency review and approval of the programmatic mitigation, is adequate for City decision-makers to make an informed decision on adoption of the Master Plan. It should be noted that the proposed Master Plan does not recommend project development within the Goleta Slough. Rather, projects recommended in the Master Plan are located within the developed areas of the Airport already covered by existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks.

AUD-12: This comment states that some species accounts are inaccurate. See comments AUD-18 through AUD - 25 for specific comments.

Response: See responses to comments **AUD-18** through **AUD-25.**

AUD-13: This comment states that the Draft EIR and Appendix C's accounts of aquatic vertebrate and fish are inaccurate, and that appropriate sources and important literature was not reviewed, but does not provide specifics.

Response: Without specific details regarding the alleged inaccuracies and important literature that should have been reviewed, a detailed response cannot be provided. However, it should be noted that the proposed Master Plan does not recommend project development within the Goleta Slough or any aquatic habitats. Rather, projects recommended in the Master Plan are located within the developed areas of the Airport already covered by existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks.

The recently completed *Goleta Slough Sea Level Rise and Management Plan*, which presumably is an acceptable source of information to the Audubon Society, has been incorporated by reference into the Recirculated Draft EIR. It contains additional information on both tidewater gobies and the Goleta Slough steelhead population in Chapter 2, and has been summarized and incorporated into the Recirculated Draft EIR discussion of tidewater gobies and steelhead within Section 4.2.1.

AUD-14: This comment repeats that resource assessments are inadequate due to restricted access to the Goleta Slough.

Response: The proposed Master Plan does not recommend project development within the Goleta Slough. One project is proposed for an upland/transitional area within the existing airfield for the Taxiway H Airfield Safety Project. This area was surveyed and was included within the biological study area.

AUD-15: This comment states that requests were made in advance of the preparation of the Airport Master Plan for additional studies and monitoring with the Goleta Slough that were not completed.

Response: The proposed Master Plan does not recommend project development within the Goleta Slough. Rather, projects recommended in the Master Plan are located within the developed areas of the Airport already covered by existing programs, such as the City of Santa

Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks.

AUD-16: This comment states that the Draft EIR makes a critical omission in that there is not a presentation of the interactions among plants, animals, and their abiotic environments in the Goleta Slough ecosystem. This comment also maintains that the Draft EIR should protect and restore the varied habitats that were originally present in the Slough.

Response: The proposed Master Plan does not recommend project development within the Goleta Slough. Rather, projects recommended in the Master Plan are located within the developed areas of the Airport already covered by existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks. The analysis requested in this comment is beyond the scope of this Master Plan and EIR effort, which is to evaluate a 20-year facilities plan for an existing airport.

AUD-17: This comment repeats comments AUD-9 and AUD-11 regarding the timing and extent of field surveys and the use of existing literature or local experts.

Response: See response to comment **AUD-9** and **AUD-11**. Since most of the projects recommended in the Master Plan are located within the developed areas of the Airport, the survey efforts were focused on the infield areas that could be affected by the proposed Taxiway H Airfield Safety Project. Additional project-specific surveys, which will be used for developing a detailed mitigation program, will be required at the time that the Taxiway H Airfield Safety Project moves forward.

AUD-18: This comment identifies concerns with the information and analysis provided in the Draft EIR for Goleta Slough and its feeder creeks, specifically for southern California steelhead, tidewater gobies, and California red-legged frogs.

Response: Since the Master Plan does not recommend project development within the Goleta Slough or its feeder creeks, the EIR focuses on impacts related to those projects recommended in the Master Plan. These projects are primarily located within the developed areas of the Airport already covered by existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks. In response to this and other similar comments, however, the recently completed *Goleta Slough Sea Level Rise and Management Plan* has been incorporated by reference into the Recirculated Draft EIR. It contains additional information on both tidewater gobies and the Goleta Slough steelhead population in Chapter 2, which has been summarized and incorporated into the Recirculated Draft EIR discussion of tidewater gobies and steelhead within Section 4.2.1. The *Goleta Slough Sea Level Rise and Management Plan* does not reference California red-legged frogs.

AUD-19: This comment states that the EIR should mention that the white-tailed kite receives protection through the County of Santa Barbara LCP and that fewer kite pairs are nesting in the Goleta Study Area. The comment maintains that the Draft EIR understates the importance of the Goleta Slough as habitat for the breeding population remains.

Response: While the Airport acknowledges the use of Goleta Slough by white-tailed kites, the Draft EIR assumes implementation of the Airport's adopted Wildlife Hazard Management Plan (WHMP), which requires hazing of bird species within the runway and taxiway safety areas. It is unreasonable to consider the proposed Taxiway H project site as suitable foraging habitat because wildlife in this area are hazed by Airport Operations and Patrol Divisions as part of their routine duties in compliance with the FAA Manual "Wildlife Hazard Management at Airports" dated July 2005. Section 4.2.1 has been amended to include reference to these requirements.

It should also be noted in response to this comment that the Airport is not under the jurisdiction of the County of Santa Barbara LCP, but rather, has its own local City LCP that is specific to the Airport and Goleta Slough. However, the Draft EIR identifies the white-tailed kite as a State Fully Protected species (Table 4D) and lists the Airport LCP Policy C-15, which provides protection to all special-status wildlife species, in Table 4E.

AUD-20 through AUD-26: These comments provide specific information on avian species located or previously located within the Goleta Slough environs.

Response: The City of Santa Barbara acknowledges the local expertise that the Santa Barbara Audubon Society provides. This information is hereby incorporated into the Recirculated Draft EIR. However, while the Airport acknowledges the use of Goleta Slough by numerous avian species, the Draft EIR assumes implementation of the Airport's adopted WHMP, which requires hazing of bird species within the runway and taxiway safety areas. See response to comment **AUD-19**.

AUD-27: This comment states that the environmental impacts of the Airport Master Plan cannot be determined without a complete inventory of the natural resources in the Goleta Slough and a characterization of its natural processes.

Response: The City disagrees with this comment. Since the Master Plan does not recommend project development within the Goleta Slough or its feeder creeks, the EIR focuses on impacts related to those projects recommended in the Master Plan. These projects are primarily located within the developed areas of the Airport already covered by existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks. In response to this and other similar comments, however, the recently completed *Goleta Slough Sea Level Rise and Management Plan*, which provides a

more comprehensive discussion of the Slough's resources, has been incorporated by reference into the Recirculated Draft EIR.

AUD-28: This comments objects to the programmatic level of the mitigation provided in the Draft EIR. It specifically identifies the mitigation for sea level rise.

Response: As discussed previously in response to comment **AUD-3**, the current EIR effort is not meant to fully assess the impacts of individual projects, but rather is a programmatic assessment of an airport planning document. As identified in the CEQA Guidelines Section 15168(b)(4), one advantage of a program EIR is to "allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." The Draft Environmental Impact Report explains in several places, including the Executive Summary (ES3.0, Required Discretionary Actions and Other Agency Approvals), that "Future projects recommended in the Master Plan would require discretionary approvals at the time they are ready for implementation." As discussed previously in response to comment **AUD-3**, all Master Plan projects will be subject to further environmental review and compliance under NEPA and/or CEQA, as well as all other applicable environmental laws and regulations.

Specifically, in regards to sea level rise, based on recent CEQA case law, the Draft EIR inaccurately characterized flood hazards resulting from global climate change as a project impact. Pursuant to *California Building Industry Association (CBIA) vs. Bay Area Air Quality Management District (BAAQMD) (2015)*, CEQA analysis "is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents" (CBIA, 62 Cal. 4th at 97). The sea level rise analysis has been revised in the Recirculated Draft EIR (Section 4.5), and is retained for informational purposes only. The proposed mitigation measures to address sea level rise remain as recommended mitigation measures.

AUD-29: This comment states that the Draft EIR needs to address the consistency of proposed individual projects with local, state, and federal policies, laws, and regulations.

Response: The Draft EIR contains policy analysis for resource analysis at a programmatic level. Additional policy analysis will be required as part of the permitting process for individual projects.

AUD-30: This comment states that the Programmatic Wetland Restoration Plan should be include in the Draft EIR.

Response: The Programmatic Wetland Restoration Plan is included in the Draft EIR in Section 4.2.7, BIO/mm-1, and includes the information presented in Table 4G and Exhibit 4D. It has been revised to include comments from the California Department of Fish and Wildlife within the Recirculated Draft EIR.

AUD-31: This comment states that the commenter views the Draft EIR as inadequate because it does not provide a detailed analysis of the need for the proposed projects, that the natural resources inventory is incomplete, and that possible mitigation is too vague.

Response: Please see responses to all previous comments within this letter as this comment is a summary statement of the individual points made previously.



October 30, 2015

City of Santa Barbara Planning Division
c/o Andrew Bermond, Project Planner
630 Garden Street
Santa Barbara, CA 93101

RE: Comments on Draft Airport Master Plan Environmental Impact Report

The Goleta Slough Management Committee (GSMC) was established in 1991 and since then has worked cooperatively with regulatory agencies, property owners and public interest groups to provide for a healthy Goleta Slough Ecosystem. We define the "Ecosystem" as 2,250 acres of wetlands, creeks, buffer areas and adjacent developed land that acts as one ecosystem, regardless of jurisdiction (see www.goletaslough.org). GSMC continues to identify and resolve issues related to the management of the Goleta Slough Ecosystem Management Area, particularly the Goleta Slough Ecological Reserve that is largely located on Airport property where some of the Airport Master Plan projects and mitigation measures are proposed. We appreciate the opportunity to offer comments on the Draft Airport Master Plan Environmental Impact Report. GSMC1

General Comments

1. **Level of Analysis -** The Airport Master Plan (AMP) will involve environmental impacts associated with construction, Airport operations, and increases in impervious surfaces within the Goleta Slough Ecological Reserve. However, most of the analysis of potential AMP impacts is deferred to when projects are designed. The EIR needs to address, as quantitatively as possible, the impacts of proposed projects on habitats (including sensitive species of plants and animals), storm water runoff and hydrological routing, the transport and deposition of sediment in Goleta Slough and water quality. Without additional information and analysis, we do not believe the report's assessment of less-than-significant impacts on sensitive species, migratory corridors, runoff, water quality and stream channels is warranted. GSMC2

2. **Approvals and timeline** – The DEIR is unclear as to which projects are included in the Master Plan. It is not clear if Taxiway H, for example, is part of the AMP approval process or not. This is important as the taxiway is proposed to extend into the Goleta Slough Reserve (GSR) Zone, the corresponding Goleta Slough Natural Reserve area in the Local Coastal Plan (LCP)/General Plan and the Goleta Slough Ecological Reserve (GSER) managed by the California Department of Fish and Wildlife. GSMC3

   Section 2.4 of the DEIR says the LCP conformance analysis needs to be done before AMP adoption. Clearly, if Taxiway H is included in the AMP, a GSR zone change and LCP/GP Amendment would be necessary. Basically, the Draft AMP could not be found to be consistent with the LCP/GP unless the LCP and General Plan are amended. On p. 2-8 the DEIR says "consultation" with CDFW would be required to see if an amendment to GSER is required. Given that the taxiway is proposed to extend into the GSER, an amendment to the GSER boundary would likely be required. To help illustrate this, it would be extremely helpful to include an exhibit, particularly of the proposed Taxiway H extension, that shows the extent of the GSR Zone, Goleta GSMC4 GSMC5

Slough Natural Reserve area and GSER boundary relative to the taxiway, runway and safety areas. GSMC5 cont'd

Therefore, in order to approve the AMP and find it consistent with the LCP and General Plan, those two policy documents would need to be amended at the same time. This does not seem to be what the DEIR assumes. In fact, the DEIR says that LCP conformity will be done in the future when the taxiway project is designed (tentatively in FY 2017-18). Either the taxiway and some other projects are part of the AMP and are analyzed in this document or they are not part of it. Regardless, as this is a programmatic EIR, the document needs to be very clear that those subsequent projects are not "approved" as part of the AMP process and additional project-specific review will occur in the future before a decision is reached on individual projects. GSMC6

3. **Role of GSMC and the *Goleta Slough Area Sea Level Rise and Management Plan*** – Another general comment is the lack of clarity about the role of the Goleta Slough Management Committee in the overall process. We are an advisory group that has a long history of helping to develop solutions that allow for reasonable development while providing for the best mitigation possible. We believe we should be involved in the development and implementation of the AMP. Also, we have just completed the *Goleta Slough Area Sea Level Rise and Management Plan* yet there is little mention of this plan nor use of its data and analyses in the DEIR. GSMC7

Specific Comments

4. **Justification of need for projects and associated impacts –** While the Draft Airport Master Plan goes into some detail as to why the number of operations and enplanements are expected to increase and how the AMP provides for increased safety and efficiency, it is not detailed in the DEIR to any degree. There is almost no analysis presented of how the projects proposed in the plan will contribute to efficiency or safety. Further, analyses of the environmental and safety impacts of these projects are incomplete and superficial. GSMC8

   For example, the AMP proposes to move the current maintenance yard to the northeastern part of the Airport property, near the proposed FBO lease parcels, the fuel farms, and the proposed Airport Administration offices. Although it is laudable that the maintenance yard is being moved from its current location next to Carneros Creek, the plan could be improved by proposing the removal of all structures west of the current maintenance yard which would also provide more area for wetland mitigation (see #6 below re biological mitigation). Further, the proposed maintenance yard and FOB/lease parcels are near San Pedro Creek, but there are no analyses in the DEIR that address plan impacts on San Pedro Creek or its riparian zone. GSMC9 Finally, the plan proposes to expand the fuel farm(s) along Hollister Avenue, but there is little analysis of safety concerns connected with an expanded fuel farm in a floodway near two major streets (Hollister Avenue, South Fairview Avenue). GSMC10

5. **Biological analysis –** The assessments of projects proposed in the AMP on biological resources are based on very limited and outdated information and analysis, and conclusions of Class II impacts are not warranted. The overarching problem with the DEIR's Bio section is that it minimizes resource assessments at several levels: GSMC11

   - Minimal survey time in data collection (February-March 2012 only);
   - Cites Goleta Beach and the Slough mouth as being outside the study area, yet these areas have been included in the preparation of other sections of the DEIR. This is particularly important relating to sea level rise, flooding, and impacts on certain species, e.g., Great Egrets, Tidewater gobies and Steelhead; GSMC12
   - Omission of historical data, trends and current studies and data that would be useful in GSMC13

determining impacts and mitigation; and
- Minimized discussion of the interactions between plants, animal sand abiotic aspects of the Ecosystem.

GSMC13 cont'd

The data used to assess the biological impacts of the plan's projects were based, to some degree, on surveys conducted in February and March in a dry year (2012). Surveys conducted at one time of year in a particularly dry year (precipitation in 2012 was approximately 57% of the average) will not be effective in inventorying the full range of species and the distribution of habitats present in Goleta Slough. It is well known that wetland delineations vary greatly from year-to-year, based on rainfall patterns, and wetland areas are likely to expand in wet years. Further, inventories of both plants and birds will vary with the seasons, so conducting surveys in only one season does not provide information adequate to list the species present, the extent of different habitat types, or the plan's impacts on these species or habitats (Appendices C and D). The consultants also admit that surveys were not based on standard guidelines or protocols, casting doubt on their accuracy and completeness.

GSMC14

Moreover, the biological analyses should have included a much more comprehensive analysis of impacts on the species and habitats present in Goleta Slough, rather than a cursory analysis on primarily sensitive species. There was a particular dearth of analysis on aquatic species and the impacts of the AMP on these.

GSMC15

California horned lark, a locally rare species, is said to formerly nest to the north of Runway 7-25 where the extension of Taxiway H is proposed. In fact, horned larks have been seen there for many years and one cannot assume they have been extirpated from this system.

GSMC16

Although the consultants that developed the biological analysis (Appendices C and D) attempted to make up for these shortcomings by consulting the literature and experts, they missed much information that became available from 2013 to 2015 (e.g., inventories in the GSEMP and the 2012 *Existing Conditions and Monitoring Report*, the recent *Goleta Slough Area Sea Level Rise and Management Plan*, aquatic biota surveys by USGS and UCSB personnel, CCBER archives, etc.) and didn't consult directly with some Goleta Slough experts (e.g., Mark Holmgren and the Santa Barbara Audubon Society, estuarine ecologists at UCSB like Kevin Lafferty). The consultants also did not refer to the draft *Goleta Slough Mouth Management Biological Technical Report*. Furthermore, records of steelhead in Goleta Slough streams (including San Pedro, San Jose, Maria Ygnacio, and Atascadero Creeks) are included in reports and observations by NMFS and CDFW personnel, so certainly have a status that is stronger than "anecdotal". It is clear that the DEIR did not have the most up-to-date information available and that information needs to be provided and analyzed before the EIR can be certified as "accurate and complete."

GSMC17

Finally, in section 4.2.7, Mitigation measures (2nd paragraph) say, "No net loss of wetlands can occur as a result of the proposed AMP for its impacts to jurisdictional wetlands to be fully mitigated." The DEIR should be analyzing more than just jurisdictional wetlands. We're also concerned about Environmentally Sensitive Habitats and impacts to the GSER and GSR zoned areas.

GSMC18

6. **Biological mitigation** – We are concerned that the 12.4 acres of habitat designated ESH and located within the GSER is only proposed to be mitigated at a 2:1 basis (see BIO-1). The document shows that 29.8 acres of mitigation area is available, but what happens if that is not found to be adequate? Typical wetland impact mitigation in the Coastal Zone is at least 3:1 if not 4:1, therefore this would not be sufficient mitigation to reduce the impact to less-than-significant or Class II.

GSMC19

Our biggest concern about the biological mitigation for Impact BIO-1 is that it is deferred to a future biological mitigation study. Without knowing more about the required mitigation ratio (i.e., 2:1 to 4:1), appropriateness of the area available for mitigation, likely monitoring requirements and terms, how can a conclusion be drawn that the impact is mitigated to a level of insignificance? GSMC20

The document is also vague in terms of impact to and mitigation for special status species such as Goldfields, Tidewater gobies, steelhead trout, etc. GSMC21

In Bio/mm-2, the DEIR states that applying all applicable policies of LCP will be required (in the future) and that reduces the impact to Class II. Future analysis of policies does not equal "full mitigation" as the document states on p. 4-34. GSMC22

Result Bio-2 (p. 4-35) states, "As long as potential project-specific impacts to Slough are adequately mitigated, cumulative impacts would be as well." That is not necessarily true per California Environmental Quality Act (CEQA) Guidelines Section 15130 that requires the consideration of cumulative impacts within an EIR when a project's incremental effect is cumulatively considerable. Cumulatively considerable means that "the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The cumulative analysis has not been adequately done in the DEIR. GSMC23

Finally, the EIR also should examine the plan's congruence with sections of the California Coastal Act and Local Coastal Plan dealing with development adjacent to Environmentally Sensitive Habitats (ESHs) and ESH buffers (e.g., Coastal Act Section 30240, LCP policies C4 and 15). Saying that this will be done in the future does not constitute policy conformity nor mitigation. GSMC24

7. Overall impacts of on the hydrology, geomorphology, and water quality of Goleta Slough

While some removal of paving is proposed, the net effect will be more impervious surfaces on Airport property and, in turn, effects on runoff and the routing and quality of water. Further, particularly during construction phases, projects could affect erosion and sedimentation in the Goleta Slough. Although some of these areas already have been paved, the proposed plan would alter the distribution, and increase (by approximately 5 acres) the overall amount of impervious surfaces in the Airport area. GSMC25

The DEIR is silent on whether concrete pads underlying removed structures will be removed and vegetation restored. It would be beneficial to include a map of current and proposed impervious surfaces in the AMP area. GSMC26 Further, contaminants (e.g., metals and organic carbon compounds) often accumulate on impervious surfaces and increased human activity in the AMP area would also increase contaminant inputs to the Slough. Changes in the distribution and amounts of impervious surfaces will likely affect the amounts, routing, and quality of water, with possible repercussions on the hydrology, geomorphology, and water quality of Goleta Slough. The hydrology, geomorphology, substratum characteristics, and water quality (e.g., temperature, dissolved oxygen, nutrient, pathogen, and contaminant levels) of Goleta Slough, in turn, have a large effect on the distribution and abundance of plants and animals in the Slough.

The DEIR recognizes these potential impacts but states that they could be mitigated to Class II through conformance to City policies and best management practices (BMPs), with oversight from regulatory agencies. However, the DEIR cannot really draw such conclusions without an GSMC27

analysis of how the proposed projects in the plan will affect the hydrology, sediment dynamics, geomorphology, and water quality of Slough. The *Goleta Slough Area SLR and Management Plan* gives highest priority to such analyses so that management decisions can be informed by rigorous environmental information. Further, the DEIR does not include a discussion of which BMPs will be employed, so the effectiveness of ill-defined BMPs cannot be evaluated.

The implications for many regulatory requirements, such as SWPPPs, 401 certifications, 404 permits, 303d impaired water bodies and Coastal Act provisions are numerous, but the DEIR's analysis of hydrological, sediment, geomorphological, and hydrochemical impacts is woefully inadequate. In some cases, the DEIR states that effects of specific projects, such as the Taxiway H extension, will be subjected to a detailed project-specific environmental analysis later. However, assuming the AMP includes all the proposed projects, including the Taxiway H extension, its DEIR needs to analyze the environmental effects of the AMP's components. Deferring analyses to future project-specific EIRs simply "kicks the can down the road", not allowing a clear assessment of the impacts nor feasibility of the plan itself. Similar considerations apply to the Programmatic Wetland Restoration Plan (PWRP), which should have been developed and included in the DEIR, since approval of the AMP will require the PWRP anyway.

GSMC27 cont'd

GSMC28

8. **Sea Level Rise** – The document does not seem to consider, to any degree, the potential effects of climate change and sea level rise. Impact and Result Hyd-2 (p. 4-73) state "the extent to which new Airport facilities within the floodway…areas would impede or redirect flood flows cannot be determined until the design …is known and has been evaluated." This impact is found to be less-than-significant or Class III. While the details aren't known, some basic assumptions can be made about changes to flood flows associated with a project and considering sea level rise, and an educated conclusion can be drawn. The DEIR doesn't provide enough information to justify the Class III finding.

GSMC29

Thank you for the opportunity to comment on this Draft EIR. We look forward to working with you in the future on this important plan and environmental document.

Sincerely,



Pat Saley for the
Goleta Slough Management Committeea

Response to Letter 11
Goleta Slough Management Committee (GSMC)
Dated October 30, 2015

GSMC-1: This comment explains who the Goleta Slough Management Committee is and what their purpose is.

Response: Thank you for your comments.

GSMC-2: This comment states that the Airport Master Plan will involve impacts within the Goleta Slough Ecological Reserve (GSER) and the EIR does not contain enough quantitative analysis to warrant a less-than-significant assessment of such impacts.

Response: The current Environmental Impact Report (EIR) effort is not meant to fully assess the impacts of individual projects, but rather is a programmatic assessment of an airport planning document. As such, the survey efforts undertaken in support of the Master Plan have identified the potential for biological or hydrological impacts and have provided the framework for future mitigation efforts. As identified in the CEQA Guidelines Section 15168(b)(4), one advantage of a program EIR is to "allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." The Draft EIR explains in several places, including the Executive Summary (ES3.0, Required Discretionary Actions and Other Agency Approvals), that "Future projects recommended in the Master Plan would require discretionary approvals at the time they are ready for implementation." All Master Plan projects will be subject to further environmental review and compliance under the *National Environmental Policy Act* (NEPA) and/or the *California Environmental Quality Act* (CEQA), as well as all other applicable environmental laws and regulations.

It should also be noted that the Airport implements both the City of Santa Barbara's Storm Water Management Plan (SWMP) and an airport-specific storm water pollution prevention plan (SWPPP), approved by the Central Coast Regional Water Quality Control Board (RWQCB). All future north side development will be subject to the provisions of the SWMP and permit conditions from RWQCB, as applicable. These measures are adequate to allow a conclusion of Less than Significant at the programmatic (or planning) level.

GSMC-3: This comment states that the Draft EIR is unclear which projects, for example, the Taxiway H Airfield Safety Project, are included in the Airport Master Plan approval process.

Response: The Draft EIR explains in several places, including the Executive Summary (ES3.0, Required Discretionary Actions and Other Agency Approvals), that "Future projects recommended in the Master Plan would require discretionary approvals at the time they are

ready for implementation. For example, the Taxiway H Airfield Safety Project and the relocation of the glideslope antenna, which are related projects proposed to be located within the City's Goleta Slough Reserve zone (G-S-R), would require the approval of a Coastal Development Permit (CDP) as well as an LCP amendment/rezone and General Plan amendment. All actions would be subject to future review by the City under CEQA; this programmatic EIR will be used to help determine the appropriate subsequent CEQA review." In fact, all Master Plan projects will be subject to further environmental review and compliance under the *National Environmental Policy Act* (NEPA) and/or the *California Environmental Quality Act* (CEQA), as well as all other environmental laws and regulations, whenever applicable.

GSMC-4: This comment states that the LCP policy conformance analysis needs to be done before Airport Master Plan adoption and that if the Taxiway H Airfield Safety Project is included in the Master Plan, a Goleta Slough Reserve (G-S-R) zone change and a Local Coastal Plan (LCP)/General Plan (GP) amendment will be necessary.

Response: Comment noted. The City of Santa Barbara will be required to formally adopt the proposed Master Plan. Based on the preliminary LCP policy conformance analysis completed as part of the Draft EIR, the City will also consider the initiation of an LCP/GP amendment and rezone for the portion of a future Taxiway H Airfield Safety Project that would occur within the Goleta Slough Reserve (G-S-R) zone. The Taxiway H project site is currently in the Airport Approach and Operations Zone and the Goleta Slough Reserve Zone (A-A-O/G-S-R) in both the Airport Zoning Ordinance and the Airport and Goleta Slough LCP. Taxiways are an expressly allowed use in the A-A-O, and incidental airfield infrastructure is allowable and may be installed in the G-S-R. The discussion of Impact LU-4 has been revised to state that the LCP and Airport Zoning Ordinance shall be amended to change the A-A-O/G-S-R zone designation to A-A-O. The amendments and rezone could also include revisions to existing A-F zone areas that may rezoned to G-S-R as a part of the Taxiway H mitigation program. In addition, LU/mm-1 requires a detailed project-specific impact analysis of the Taxiway H Airfield Safety Project's consistency with the G-S-R zone and policies of the Airport's LCP and *California Coastal Act* as part of the CDP and LCP amendment process.

Finally, the City of Santa Barbara recognizes the California Department of Fish and Wildlife (CDFW) as a Responsible Agency under CEQA Guidelines §15386 as a Trustee Agency of resources in the GSER. Section 4.7 of the Recirculated Draft EIR has been updated to include mitigation measure LU/mm-3:

- **LU/mm-3: The City of Santa Barbara and the CDFW shall amend the Cooperative Agreement dated August 25, 1987 (as revised) for the maintenance and management of the Goleta Slough to adjust the boundaries of the GSER to exclude the Taxiway H Airfield Safety Project site and to include a site of similar habitat value at an area ratio of 1:1 (i.e., if Taxiway H and associated actions removes 11 acres from the GSER, 11 acres would be added to the GSER from available Airport property adjacent to the Slough). This mutually-accepted exchange shall be in addition to required biological**

mitigation. The Cooperative Agreement amendment shall be presented to the California Fish and Game Commission.

GSMC-5: This comment requests that an exhibit be provided that shows the proposed Taxiway H Airfield Safety Project, the extent of the G-S-R zone, the Goleta Slough Natural Reserve area, and the GSER boundary relative to the taxiway, runway, and safety areas.

Response: Exhibit 4H of the Recirculated Draft EIR has been revised to show the proposed Taxiway H Airfield Safety Project relative to the G-S-R zone.

GSMC-6: This comment restates comments GSMC-3 and GSMC-4.

Response: Refer to responses to comments **GSMC-3 and GSMC-4**.

GSMC-7: This comment states that there is a lack of clarity in the Draft EIR regarding the role of the Goleta Slough Management Committee in the overall process and that they should have been involved in the development and implementation of the Airport Master Plan. This comment also states that little mention of the recently completed *Goleta Slough Area Sea Level Rise and Management Plan* is provided within the Draft EIR.

Response: The Goleta Slough Management Committee is discussed in the Draft EIR in Sections 4.2.2 and 4.5.2 under the discussions of the *Goleta Slough Ecosystem Management Plan* and the *Goleta Slough Area Sea Level Rise and Management Plan*, respectively. The Goleta Slough Management Committee was also invited to serve on the Master Plan Advisory Committee (PAC) (see attached letter dated November 10, 2011) and a representative from the Committee attended several of the PAC meetings. The PAC met throughout the planning process to review draft working papers on each of the Master Plan chapters, to receive information about environmental concerns, and to discuss the various alternatives under consideration. The Goleta Slough Management Committee was also given regular briefings regarding the status of the Master Plan by an Airport staff member, who also serves on the Goleta Slough Management Committee.

The *Goleta Slough Sea Level Rise and Management Plan* document was finalized subsequent to the preparation of the Draft EIR. However, in response to this and other similar comments, it has been incorporated by reference into the Recirculated Draft EIR.

GSMC-8: This comment states that information from the Airport Master Plan regrading justification of need for recommended projects is not included within the Draft EIR.

City of Santa Barbara
Santa Barbara Airport

www.flysba.com

November 10, 2011

Patricia Saley, AICP
Goleta Slough Management Committee
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RE: SANTA BARBARA AIRPORT MASTER PLAN ADVISORY COMMITTEE INVITATION

Dear Ms. Saley:

The City of Santa Barbara is beginning the process of preparing an Airport Master Plan for the Santa Barbara Airport. The Plan, which is being prepared by the airport consulting firm Coffman Associates, will provide an updated long-term development program for the continued operation of a safe, efficient, and environmentally sensitive airport facility.

The key to the success of a study of this nature is public input and participation. As a first step in achieving this goal, an Airport Master Plan Advisory Committee (Advisory Committee) is being formed to assist in providing objective evaluations and input. The Advisory Committee, which is a non-voting body, will advise the consultant on the content and recommendations of the Master Plan study through meetings and review of working papers. We respectfully extend an invitation to you or your designated representative to serve on this important committee. This will involve attending five committee meetings over the next 18 months, as well as reviewing and commenting on the study material as it is prepared.

The first Advisory Committee meeting will be held on December 7, 2011, at 2:00 p.m. in the Airport Department Conference Room, 601 Firestone Road, Santa Barbara. The purpose of the meeting will be to discuss the Airport Master Plan process, the role of the Advisory Committee, study materials, and specific issues that may need to be addressed during the development of the Master Plan. Assistant Airport Director Hazel Johns will be the project manager for the Master Plan process. Please notify Andrew Bermond, Project Planner at (805) 692-6032 or ABermond@SantaBarbaraCA.gov as soon as possible to confirm your designee's or your participation on the Advisory Committee.

In the meantime, if you should have any questions about your role on the Advisory Committee or about the Plan itself, please call either Hazel Johns or me at (805) 967-7111. We look forward to your participation in this process.

Sincerely,

Karen Ramsdell
Airport Director

Cc: Hazel Johns, Assistant Airport Director
Andrew Bermond, AICP, Project Planner
Jim Harris, Coffman Associates

SBA
Santa Barbara Airport

Response: Due to the amount of detailed information provided in the Master Plan regarding aviation forecasting, demand/capacity analysis, and facility requirements necessary to meet projected future growth at the Airport and Federal Aviation Administration (FAA) safety standards, the entire Master Plan is incorporated by reference into the Draft EIR (as is allowed by CEQA Guidelines §15150). The aviation forecasts are also summarized within Chapter Two of the Draft EIR. The draft Master Plan contains extensive quantitative forecasting of future airport operations, which in turn, drive future need for landside improvements. However, adoption of the Master Plan does not mean that these improvements will necessarily occur. They will only move forward, if and when, demand has increased and funding is available.

GSMC-9: This comment states that the recommended relocation of the current maintenance yard to the northeastern part of the Airport would be improved by proposing the removal of all structures west of the current yard to provide more area for wetland mitigation. Potential impacts of the new yard and Fixed Base Operator parcels on San Pedro Creek and its riparian zone are not addressed.

Response: Comment noted. The Recirculated Draft EIR includes discussion of potential indirect impacts to nearby creeks in Section 4.2.5, Impact BIO-3.

GSMC-10: This comment states that little analysis of safety concerns related to the proposed fuel farm expansion is included in the Draft EIR.

Response: As previously discussed in the response to comment **GSMC-9**, the Airport implements both the City of Santa Barbara's SWMP and an airport-specific SWPPP. All future fuel farm development will be subject to the provisions of the SWMP and permit conditions from RWQCB, as applicable. In addition, there are a myriad of existing regulations regarding all aspects of fuel delivery, storage, and distribution, and the Airport implements of spill prevention control and countermeasure (SPCC) plans. Thus, the potential increase in fuel storage was found to be Less than Significant within the Initial Study and did not warrant further evaluation at the programmatic level. See also the discussion contained in Impact G/HAZ-3 and Result G/HAZ-3 of the Draft EIR, which reiterates the conclusions of the Initial Study.

These measures are adequate to allow a conclusion of Less than Significance at the programmatic (or planning) level. All Master Plan projects will be subject to further environmental review and compliance under NEPA and/or CEQA, as well as all other applicable environmental laws and regulations. Thus, if a fuel farm expansion or other north side development goes forward, project-specific analysis will be required at that time based on the project-specific details.

GSMC-11: This comment states that the Draft EIR's biological section is based on minimal survey time in data collection.

Response: Additional project-specific surveys, which will be used for developing a detailed mitigation program, will be required at the time that the Taxiway H Airfield Safety Project moves forward. This EIR is a programmatic EIR and is not intended to provide the level of detail necessary to approve or evaluate specific impacts of any particular development project recommended within the Master Plan. As such, a one-season survey is adequate to provide an indication of when, and where, additional project-specific surveys will be necessary.

GSMC-12: This comment states that the Draft EIR's biological study area excludes Goleta Beach and the Slough mouth as being outside of the study area, even though they are important to sea level rise, flooding, and impacts on species such as Great egrets, tidewater gobies, and steelhead.

Response: Comment noted. The analysis requested in this comment is beyond the scope of this Master Plan and EIR effort. Projects recommended in the Master Plan are located within the developed areas of the Airport already covered by existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks, and areas downstream such as Goleta Beach and the Slough mouth. See response to comment **GSMC-28** for a discussion specific to sea level rise. In addition, the recently completed *Goleta Slough Sea Level Rise and Management Plan* has been incorporated by reference into the Recirculated Draft EIR. It contains additional information on both tidewater gobies and the Goleta Slough steelhead population in Chapter 2, which has been summarized and incorporated into the Recirculated Draft EIR discussion of tidewater gobies and steelhead within Section 4.2.1.

GSMC-13: This comment states that the Draft EIR's biological study area should include historical data, trends and current studies to determine impacts and appropriate design mitigations, and minimizes discussion of the interaction between plants, animals, and abiotic aspects of the ecosystem.

Response: The analysis requested in this comment is beyond the scope of this Master Plan and EIR effort. Impacts to at-risk species are monitored and regulated at a regional, statewide, and nationwide level by resource agencies with the responsibility for monitoring species trends and providing suitable mitigation. The City of Santa Barbara feels that the amount of information provided in the EIR, in conjunction with appropriate resource agency review and approval of the programmatic mitigation, is adequate for City decision-makers to make an informed decision on adoption of the Master Plan. It should be noted that the proposed Master Plan does not recommend project development within the Goleta Slough. Rather, projects recommended in the Master Plan are located within the developed areas of the Airport already covered by existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks. One project is proposed for an upland area within the existing airfield for the Taxiway H Airfield Safety Project. This area was surveyed and is within the biological study area.

GSMC-14: This comment restates comment GSMC-11.

Response: See response to comment **GSMC-11.**

GSMC-15: This comment restates comments GSMC-12 and -13, and specifically mentions a lack of analysis on aquatic species.

Response: See responses to comments **GSMC-12** and **-13.** The proposed Master Plan does not recommend project development within or adjacent to aquatic habitats associated with the Goleta Slough or its feeder creeks. Rather, projects recommended in the Master Plan are located within the developed areas of the Airport already covered by existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks. The Taxiway H Airfield Safety Project, if approved, will be located approximately 250 feet from Carneros Creek at its closest point. This project will be subject to further environmental review, as well as a CDP, and must follow all applicable LCP policies (see BIO/mm-2).

GSMC-16: This comment states that California horned larks, a locally rare species, have been seen north of Runway 7-25 in the location of the Taxiway H Airfield Safety Project.

Response: The Draft EIR assumes implementation of the Airport's adopted Wildlife Hazard Management Plan (WHMP), which requires hazing of bird species within the Runway and Taxiway Safety Areas. It is unreasonable to consider the proposed Taxiway H project site as a likely foraging or nesting area for the California horned lark because wildlife in this area are hazed by Airport Operations and Patrol Divisions as part of their routine duties in compliance with the FAA Manual "Wildlife Hazard Management at Airports" dated July 2005.

However, the Recirculated Draft EIR (Section 4.2.1) has been amended to include a reference to these FAA requirements. In addition, Section 4.2.7 of the Recirculated Draft EIR has been amended to include the following mitigation measure to protect all nesting birds.

- **BIO/mm-3: No construction shall occur during the avian breeding season (February 1-September 1) unless a survey from qualified biologist with experience in conducting breeding bird surveys finds that no bird breeding habitat exists within 300 feet of the disturbance area (500 feet for raptors) or can state with certainty that such habitat does not contain nesting birds. Project personnel, including contractors working on the site, shall be instructed on the sensitivity of the area. Reductions in nest buffer distance may be approved by the City's Community Development Department depending on the avian species involved, ambient levels of human activity, screening vegetation, or other factors.**

GSMC-17: This comment states that the biological existing conditions reports upon which the Draft EIR are based missed information that became available between 2013 and 2015 and didn't consult directly with some Goleta Slough experts or the records of steelhead in Goleta Slough streams that are included in reports and observations by resource agency personnel.

Response: The Airport Master Plan process began in 2011 and the biological inventories included in the Draft EIR (Appendices C and D) were completed in 2012 as part of the Master Plan's Environmental Overview. However, all projects recommended in the Master Plan are located within the developed areas of the Airport and are already covered by existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks. As mentioned in response to comment **GSMC-15**, the proposed Master Plan does not recommend project development within or adjacent to aquatic habitats associated with the Goleta Slough or its feeder creeks and is not expected to have any adverse impacts to steelhead, or other aquatic species.

The City of Santa Barbara feels that the amount of information provided in the EIR, in conjunction with appropriate resource agency review and approval of the programmatic mitigation, is adequate for City decision-makers to make an informed decision on adoption of the Master Plan. However, in response to this comment, additional information from the recently completed *Goleta Slough Sea Level Rise and Management Plan* has been incorporated by reference into the Recirculated Draft EIR. It contains additional information on both tidewater gobies and the Goleta Slough steelhead population in Chapter 2, which has been summarized and incorporated into the Recirculated Draft EIR discussion of tidewater gobies and steelhead within Section 4.2.1.

GSMC-18: This comment states that the Draft EIR should address, not just jurisdictional wetlands, but impacts to Environmentally Sensitive Habitats and impacts to the Goleta Slough Ecological Reserve and G-S-R zoned areas.

Response: The following discussion is included within the Draft EIR in Section 4.6.4 under Impact LU-3. In response to this comment, this analysis has also been summarized in Section 4.2.5 of the Recirculated Draft EIR under Regional (Cumulative) Impacts:

> Environmentally Sensitive Habitat Areas
>
> The majority of the airport improvements would be located in areas that are currently developed and therefore have no potential to impact ESHAs. Airfield improvements would occur in areas mapped as non-native annual brome grassland and dredge spoil or work areas, which are located immediately adjacent to or in proximity to existing facilities, and therefore have a low potential to contain ESHA. The location and design of the Taxiway H Airfield Safety Project avoids sensitive vegetation communities and provides maximum setbacks from adjacent resources associated with Carneros and Tecolotito Creeks and Goleta Slough, specifically avoiding development encroachment near the scrub

and wetland habitats occurring southwesterly of the existing airfield facilities (refer to **Exhibit 4B**). No improvements would occur in habitat areas known to support special-status species.

Consistent with LCP policies addressing potential impacts to sensitive habitats and species, potential indirect impacts to ESHA and special-status species would be identified and mitigated during project-specific environmental review to ensure mitigation measures would be implemented to protect sensitive habitat and species, and to ensure provisions of appropriate setbacks/buffers between development and ESHA. These buffers are necessary to ensure adjacent land uses are developed and maintained compatible with the continuance of habitat areas and to address potential short term construction activity impacts that could inadvertently encroach into ESHA or occur during important roosting, breeding, foraging, migrating and nesting periods for special-status species. Compliance with the LCP's ESHA protection policies and identified project-specific mitigation measures would ensure that new development for the Master Plan would be implemented in a manner to protect ESHA and sensitive status species.

See also response to comment **GSMC-4**. Section 4.7 of the Recirculated Draft EIR has been updated to include mitigation measure LU/mm-3.

GSMC-19: This comment states that 12.4 acres of "habitat designated ESH and located within the GESR is only proposed to be mitigated at a 2:1 basis, and that typical wetland impact mitigation within the Coastal Zone is 3 or 4:1.

Response: This comment incorrectly characterizes the habitat that would be disturbed by the proposed Taxiway H Airfield Safety Project within the GESR as ESH (i.e., environmentally sensitive habitat). It is, in fact, disturbed upland, transitional, or remnant wetlands vegetated primarily with annual grasses (see not only the Draft EIR, but comments **CDFW-8** and **-9** of the CDFW letter). If additional mitigation for wetlands are needed as a result of future development at the Airport, additional mitigation areas will be provided. However, at this time, the Programmatic Wetland Restoration Program already developed in the Draft EIR (as revised by the CDFW and included in the Recirculated Draft EIR) is considered sufficient to mitigate potential impacts of Master Plan implementation.

GSMC-20: This comment states that the commenter is concerned about "deferred" biological mitigation study.

Response: See response to comment **GSMC-19**. The Programmatic Wetland Restoration Plan is included in the Draft EIR in Section 4.2.7, BIO/mm-1, and includes the information presented in Table 4G and Exhibit 4D. It has been revised to include comments from the CDFW within the Recirculated Draft EIR.

GSMC-21: This comment asks about mitigation for special-status species such as goldfields, tidewater gobies, and steelhead trout.

Response: Coulter's goldfield is a locally rare plant that is found in the pickleweed and saltflats of Goleta Slough. Tidewater gobies and steelhead trout are fish that require open water. There is no development proposed by the Master Plan for these areas. As previously discussed, indirect impacts of the developed portions of the Airport are subject to the requirements of existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks.

GSMC-22: This comment states that consistency with LCP policies will not necessarily reduce impacts of specific projects to less than significant levels.

Response: Until project details of specific development proposals are known, project-specific mitigation cannot be developed. Implementation of the Master Plan relies on existing and proposed environmental programs and policies, which is appropriate mitigation at the planning level.

GSMC-23: This comment identifies the following statement from the Draft EIR, "As long as potential project-specific impacts to the Slough are adequately mitigated, cumulative impacts would be as well" and argues that an adequate cumulative analysis has not been done.

Response: This comment takes the above statement and assesses its validity without appropriate context. The context of the discussion is that there are no other future cumulative projects proposed at the Airport that should be taken in conjunction with the proposed Master Plan. It is a 20-year planning document. Also, as previously discussed, indirect impacts of all past, present, and future Airport projects within the developed portions of the Airport are subject to the requirements of existing programs, such as the City of Santa Barbara's SWMP and an airport-specific SWPPP, which have been designed to protect Goleta Slough and its feeder creeks.

It is acknowledged, however, that there are other jurisdictions that could approve projects affecting the Goleta Slough. Therefore, the Recirculated Draft EIR includes an expanded discussion of these other approving agencies, including the City of Goleta, the County of Santa Barbara, and the University of California, Santa Barbara, and their potential to cause cumulative impacts to the Goleta Slough. See Section 4.2.5, Impact BIO-4.

GSMC-24: This comment states that the Draft EIR should examine the Airport Master Plan's "congruence" (i.e., consistency) with sections of the *California Coastal Act* and Local Coastal Plan that deal with development adjacent to ESH and ESH buffers.

Response: This analysis was done as part of the Draft EIR. See Section 4.6.4 under Impact LU-3.

GSMC-25: This comments identifies increases in impervious surfaces, surface water runoff, and the routing and quality of runoff that could occur due to Airport Master Plan implementation, including during the construction phases.

Response: Comment noted. The Draft EIR discusses the potential for these occurrences due to Master Plan implementation and identifies the applicable airport-wide plans and programs already in place (such as the City of Santa Barbara's SWMP and an airport-specific SWPPP) to prevent impacts to the Goleta Slough and its feeder creeks. During construction activities, additional conditions will be required through the implementation of the General Construction permit program of the Central Coast RWQCB.

GSMC-26: This comment asks whether concrete pads under underlying removed structures will be removed and vegetation restored, and asks for a map of current and proposed impervious surfaces within the Airport Master Plan area.

Response: In most cases, structures will be removed to create space for redevelopment. In these situations, the underlying concrete pads will most likely be removed and a new foundation or pavement put in its place. The Recommended Development Concept Map contained in Ex. 2B of the Draft EIR shows areas where pavement is planned to be removed or installed, and where existing buildings are planned to be removed and new buildings constructed. The exception to this general situation is in the new FBO lease areas and areas designated for revenue support since individual site plans will be part of each individual lease agreement.

Where historic buildings Nos. 248 and 249 or the existing maintenance yard are located within the regulatory floodway, no new buildings will be constructed. For the relocated maintenance yard, the analysis assumed that existing buildings will remain in place. If reused, the new uses will be subject to the City's Flood Plain Management Ordinance. If removed, impacts of specific physical changes cannot be analyzed at a programmatic level, when there is no defined development or redevelopment site plan to assess. Site-specific impacts of the recommended Master Plan concept plan will be addressed in subsequent environmental studies.

GSMC-27: This comment maintains that increased human activity within the Airport Master Plan area would also increase contaminant inputs to the Slough, as well as changes affecting the amounts, routing, and quality of water. This in turn could affect the hydrology, geomorphology, and water quality of the Goleta Slough. The comment acknowledges that these issues are recognized in the Draft EIR, but questions the Draft EIR conclusion that conformance to City policies and best management practices (BMPs), under oversight from regulatory agencies, is enough to mitigate impacts to less than significant (Class II) levels. The comment states that project-specific analysis and details about which BMPs will be used is required, and that deferring such analyses to future project-specific EIRs is not adequate.

Response: The type of analysis that this comment recommends is not feasible at the planning level, when project-specific details are not yet known. This comment is not recognizing the programmatic nature of the current Draft EIR effort.

GSMC-28: This comment states that the Draft EIR should consider water quality issues in the Programmatic Wetland Restoration Plan and that this plan should have been included in the Draft EIR.

Response: The Programmatic Wetland Restoration Plan is included in the Draft EIR in Section 4.2.7, BIO/mm-1, and includes the information presented in Table 4G and Exhibit 4D. It has been revised to include comments from the CDFW within the Recirculated Draft EIR. In addition, Section 4.2.4 of the Recirculated Draft EIR has been revised to include discussion of indirect impacts to creeks in proximity to the project study area. Water quality impacts to the Slough are also addressed in Section 4.5, Hydrology and Water Quality of the Draft and Recirculated Draft EIRs.

GSMC-29: This comment states that the Draft EIR does not consider, to any degree, the potential effects of climate change and sea level rise, and that its Class III, Less than Significant finding is not justified.

Response: This comment is incorrect, as the Draft EIR identified potential future flooding related to sea level rise at the Airport, as Class II, Less than Significant Impact with Mitigation, not Class III. However, based on recent CEQA case law, the Draft EIR inaccurately characterized flood hazards resulting from global climate change as a project impact. Pursuant to *California Building Industry Association (CBIA) vs. Bay Area Air Quality Management District (BAAQMD) (2015)*, CEQA analysis "is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents" (CBIA, 62 Cal. 4th at 97). The sea level rise analysis has been revised in the Recirculated Draft EIR (Sections 4.5.1 and 4.5.4, Result HYD-2c), and is retained for informational purposes only. The proposed mitigation measures to address sea level rise remain as recommended mitigation measures.

CITY OF SANTA BARBARA
AIRPORT COMMISSION
M I N U T E S
September 16, 2015

CALL TO ORDER: The Meeting on Wednesday, September 16, 2015 was called to order at 6:05 p.m. in the Airport Administration Conference Room - 601 Firestone Road, Santa Barbara, CA.

ROLL CALL

Airport Commissioners: Bruce Miller, Craig Arcuri, Karen Kahn, and Kirk Martin

Staff: Hazel Johns, Airport Director
Tracy Lincoln, Airport Operations Manager
Andrew Bermond, Project Planner
Rebecca Fribley, Sr. Property Management Specialist
Myndi Hegeman, Airport Commission Secretary

Absent: Commissioners Carl Hopkins, Dolores Johnson, and Jim Wilson

PUBLIC COMMENT

1. No one wished to speak.

NOTICES

2. That on Thursday, September 10, 2015 at 5:30 p.m., the Airport Commission Secretary duly posted this agenda on the bulletin board at Airport Administration.

ACTION: Presented

MINUTES

3. SUBJECT: MINUTES

RECOMMENDATION: That Airport Commission waive the reading and approve the minutes of the meeting of Wednesday, August 19, 2015.

ACTION: Motion/Second for approval of the Minutes by Commissioners Kahn/Martin. Unanimous voice vote (Absent Commissioners Hopkins, Johnson, and Wilson).

CONSENT CALENDAR

4. SUBJECT: LEASE AGREEMENT WITH CONDOR AIRCRAFT TECHNICAL SCHOOL

RECOMMENDATION: That Commission approve and authorize the Airport Director to execute a month-to-month Lease Agreement with Condor Aircraft Technical School, a California Corporation, for 560 square feet of office space, at 1407-A Norman Firestone Road, at the Santa Barbara Airport, effective October 1, 2015, for a monthly rental of $577.

5. SUBJECT: LEASE AGREEMENT WITH SWISS DESIGN CONSTRUCTION

RECOMMENDATION: That Commission approve and authorize the Airport Director to execute a month-to-month Lease Agreement with Remo Schluep, a Sole Proprietorship, dba Swiss Design Construction for 412 square feet of office and storage space, at 1407-A Norman Firestone Road, at the Santa Barbara Airport, effective October 1, 2015, for a monthly rental of $556, exclusive of utilities.

6. SUBJECT: PROPERTY MANAGEMENT REPORT – SEPTEMBER 2015

RECOMMENDATION: That Airport Commission receive the monthly Airport Property Management Report from Rebecca Fribley, Sr. Property Management Specialist.

ACTION: Motion/Second for approval of the Consent Calendar by Commissioners Kahn/Arcuri. Unanimous voice vote (Absent Commissioners Hopkins, Johnson, and Wilson).

LIAISON REPORTS

City of Santa Barbara Liaison Councilmember Frank Hotchkiss
City of Goleta Liaison Councilmember Michael T. Bennett

ACTION: Presented

ADMINISTRATIVE REPORTS

7. SUBJECT: AIRPORT PUBLIC ART POLICIES AND GUIDELINES

RECOMMENDATION: That Airport Commission approve the Santa Barbara Airport Public Art Program Policies and Guidelines as presented.

ACTION: Presented by Hazel Johns, Airport Director. Motion/Second for approval of the Guidelines by Commissioners Arcuri/Martin. Unanimous voice vote (Absent Commissioners Hopkins, Johnson, and Wilson).

PUBLIC HEARINGS

8. SUBJECT: AIRPORT MASTER PLAN DRAFT ENVIRONMENTAL IMPACT REPORT

RECOMMENDATION: That Airport Commission hold a public hearing to take public comments on the Draft Environmental Impact Report for the Santa Barbara Airport Master Plan.

ACTION: Presented by Andrew Bermond, Project Planner. Public comment received from Gordon Feingold of Santa Barbara:

1. When Runway 7 was shifted to the west, a business jet overran the runway and avoided a pit (creek) that had previously been there. Fatalities were avoided by this safety project.
2. Taxiway H would also have a safety benefit. It should be a Class IV beneficial impact. How is that considered in the EIR?

GF1

DIRECTOR'S REPORT

9. A. Airport Operations
    - Passenger Count
    - Aircraft Operations
    - Air Freight

   B. Programs
    1. Communications Program
    2. Master Plan
    3. Wildlife Hazard Assessment

   C. Capital Projects
    1. Airfield Electrical, Safety, and Fence Project
    2. North General Aviation Ramp Replacement Project

   D. Financial Summary

   E. Safety, Enforcement and Protection

F. City Council / Airport Commission Actions

ACTION: Presented by Hazel Johns, Airport Director

ADJOURNMENT - 6:51 p.m. on order of Vice-Chair Miller.

Hazel Johns
Airport Director

Myndi Hegeman
Airport Commission Secretary

Response to Oral Comment 1, Gordon Feingold (GF)
Airport Land Use Commission Hearing
September 16, 2015

GF-1: Discussed a previous runway overrun incident when the extension of Runway 7 prevented fatalities. Stated that the Taxiway H Airfield Safety Project would also have a safety benefit and should be listed as a Class IV, Beneficial Impact. Asked how this is considered in the EIR.

Response: The safety aspects of the proposed Taxiway H Airfield Safety Project are characterized as such within the project description of the Draft EIR (see Section 2.2.2, Recommended Airfield Development) as well as throughout the environmental analysis. For example, see the discussion in Section 4.2.4 under Impact BIO-1 and Result BIO-1, which discuss the applicability of Local Coastal Plan policies to airfield safety projects. However, the Class IV, Beneficial Impact classification mentioned in this comment is used to characterize potential environmental impacts of a project, rather than the description of the project itself.

City of Santa Barbara
Planning Division

PLANNING COMMISSION MINUTES

OCTOBER 1, 2015

CALL TO ORDER:

Chair Campanella called the meeting to order at 1:00 P.M.

I. **ROLL CALL**

Vice-Chair John P. Campanella, Commissioners Jay D. Higgins, Mike Jordan, Sheila Lodge, and Deborah L. Schwartz.

Absent: Commissioners Addison Thompson and June Pujo

STAFF PRESENT:

Allison De Busk, Project Planner
N. Scott Vincent, Assistant City Attorney
Hazel Johns, Airport Director
Rob Dayton, Principal Transportation Planner
Andrew Bermond, AICP, Project Planner
Peter Brown, Mobility Coordinator
Julie Rodriguez, Planning Commission Secretary

II. **PRELIMINARY MATTERS:**

A. Requests for continuances, withdrawals, postponements, or addition of ex-agenda items.

None.

B. Announcements and appeals.

None.

C. Review, consideration and action on the following draft Planning Commission Minutes and Resolutions:

1. September 3, 2015

MOTION: Jordan/Schwartz
Approve the minutes as corrected.

This motion carried by the following vote:

Ayes: 5 Noes: 0 Abstain: 0. Absent: 2 (Pujo, Thompson)

D. Comments from members of the public pertaining to items not on this agenda.

Chair Campanella opened the public hearing at 1:01 P.M. and, with no one wishing to speak, closed the hearing.

III. ENVIRONMENTAL HEARING:

ACTUAL TIME: 1:01 P.M.

AIRPORT MASTER PLAN DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) HEARING

The purpose of this hearing was to take public comments on the Draft Environmental Impact Report for the Draft Airport Master Plan.

The proposed Master Plan consists of:

- Airfield Recommendations: Extension of Taxiway H to the west, parallel to the main instrument runway, restriping of existing paved areas, paving light lanes along taxiway edges, and relocating entrances and exits from the taxiway system to comply with Federal Aviation Administration (FAA) recommendations.
- North Landside Recommendations: Consolidation of general aviation operations to facilitate two Fixed Base Operator (FBO) lease areas on the northeast portion of the airfield to provide tenant and visiting private aircraft services and facilities, and support facility changes including the relocation of the Airport Maintenance Yard.
- Terminal Area Recommendations: Construction of a new Long Term Parking Lot south of the Airline Terminal to accommodate 1,315 new or relocated parking spaces, expansion of the Airline Terminal, and relocation of the south-side FBO.

Due to the proximity of the Goleta Slough to certain proposed projects in the Master Plan, it is likely that approval of a Local Coastal Program (LCP) amendment will be necessary for some of the proposed actions. An LCP amendment will, therefore, be considered along with the proposed actions, as appropriate.

The public review period began on August 31, 2015. **All comments on the Draft EIR must be received by Friday, October 30, 2015.**

Contact: Andrew Bermond, AICP, Project Planner
Email: ABermond@SantaBarbaraCA.gov Phone: (805) 564-5470, ext. 4549

Andrew Bermond, AICP, Project Planner, gave the Staff presentation.

Chair Campanella opened the public hearing at 1:20 P.M.

The following people commented on the project:

1. Mathew Clint Orr, California Country Dance Foundation, encouraged incorporating a regional dance hall auditorium at the intersection of Frederick Lopez and Hollister Avenue into the Airport Master Plan. He described a dance hall that would look like a barn and have plenty of parking. It would be used for dances and only serve beer or wine, no hard alcohol. It would be a regional draw and would be run by the California Country Dance Foundation. ORR1
2. Tom McGregor, Accurate Aviation, has been a tenant at the airport since 1984. He has heard that Atlantic Aviation will be knocked down for a parking lot. He is concerned with the increasing traffic generated by the parking lot and development in Goleta. Santa Barbara needs to deal with Goleta more on the issue of traffic. Santa Barbara Airport will not become the commercial airport that we think it will be. McG1 McG2
3. Robert James Trimble, combat veteran, is concerned with bulldozing the hangar for a long-term parking lot on the south side of the Airline Terminal. As a veteran, he takes issue with the loss of the Marine Corps hangar and its history. RJT1

Carl Hopkins, Airport Commission Chair, made himself available to answer any of the Commission's questions.

With no one else wishing to speak, the public hearing was closed at 1:26 P.M.

Commissioner's Comments:

1. Commissioner Jordan appreciates the great job that staff has done the last four to five years and in identifying any impacts. He is happy to hear that there is only one Class One impact and thinks the mitigation plans for the other impacts are on track.
2. Commissioner Schwartz commended Ms. Johns, Mr. Bermond and the consultant team. The breadth and depth of issues are sufficiently laid out. Would like to see more done to utilize the Airport and make it an economic resource. She suggested adding flight-oriented attractions to the Airport for those that love flight and air and space. She also suggested inclusion of a restaurant or mini-museum to the Airport.
3. Commissioner Campanella thanked staff for the work done on the Draft Environmental Impact Report. It will serve as a foundation for future Airport projects. You are well set up to accomplish the work programs identified in the EIR and the EIR sets the foundation for making a case for overriding consideration in the future.

Chair Campanella called for a recess at 2:11 P.M. and reconvened the meeting at 2:18 P.M.

IV. CONCEPT REVIEW:

ACTUAL TIME: 2:18 P.M.

DISCLOSURE:
To avoid any actual or perceived conflict of interest, Commissioner Campanella disclosed that he had represented the developer on the adjacent project to the north of 15 S. Hope Avenue in the early 2000's. He was compensated for that project until 2006 and has no further financial interest in the developed project since then.

APPLICATION OF KEN MARSHALL, DUDEK, APPLICANT FOR JOHNMAN HOLDING LLC, 15 S. HOPE AVENUE, APN 051-040-058, C-2/SD-2 (COMMERCIAL/"UPPER STATE STREET AREA" SPECIAL DISTRICT) ZONES, GENERAL PLAN DESIGNATION: COMMERCIAL/HIGH RESIDENTIAL (MST2015-00010)

Proposal to demolish the existing 8,368 square-foot non-residential building and construct a 41,486 square-foot mixed-use development on a 33,910 square-foot lot. The project includes 592 net square feet of commercial floor area and 46 residential units (comprised of 11 studio units, 32 one-bedroom units, and 3 two-bedroom units) totaling 36,125 square feet plus ancillary space (lobby, office, storage, fitness room). The project would be developed as a four-story building with an underground parking garage, and a detached two-story residential. Parking would consist of 11 spaces at-grade and 40 spaces underground for a total of 51 parking spaces; 47 bicycle parking spaces are proposed. Vehicular access would be provided from Hope Avenue, and a four-foot sidewalk dedication would be granted. Approximately 6,900 cubic yards of excavation is anticipated for the underground garage. The project proposes a 45-foot setback from the top-of-bank of Arroyo Burro Creek to the first floor of the development, with the second, third and fourth floors cantilevering out up to 15 feet beyond that (closer to the creek). The project also includes creek restoration and more than 13,000 square feet of open space.

This is an Average Unit Size Density (AUD) Incentive Program Priority Housing development with a proposed density of 60 dwelling units per acre and with an average unit size of 785 square feet.

This project requires Planning Commission Conceptual Review because the lot size is more than 15,000 square feet and the project is being proposed under the Average Unit-Size Density (AUD) Incentive Program Priority Housing Overlay (SBMC §28.20.080).

The purpose of the concept review was to allow the Planning Commission and the public the opportunity to review the proposed project design at a conceptual level and provide the Applicant, Staff and the Architectural Board of Review with feedback and direction. The opinions of the Planning Commission may change or there may be ordinance or policy changes that could affect the project that would result in requests for project design changes. **No formal action on the development proposal was taken at the concept review, nor was any determination made regarding environmental review of the proposed project. The environmental review will be done prior to action on the project by the design review board.**

Contact: Allison DeBusk, Project Planner

Email: ADeBusk@SantaBarbaraCA.gov Phone: (805) 564-5470, ext. 4552

Allison DeBusk, Project Planner, gave the Staff presentation.

Darren Embry, Director of Community Development at Faring Capital, gave the Applicant presentation joined by Benjamin Anderson, R & A Architecture and Design. John Cuykendall, Dudek, was also present.

Chair Campanella opened the public hearing at 2:55 P.M.

Wm. Howard Wittausch, Architectural Board of Review (ABR) Member, distributed to the Commission seven points that the ABR made during their meeting held September 28, 2015. He did clarify that the ABR opposed the panhandle units with a 4/3 straw poll. This does not preclude use of panhandle units, but was more of a concern for the constraints of the site in that area. The units may not be very livable as there are no openings on the west side possible. The ABR asked that the Applicant study the tight space. The consensus of the ABR is that this is a large project that is moving in the right direction and the ABR found it to be compatible with Santa Barbara and the neighborhood in size, bulk and space. The ABR appreciates that the Applicant has worked with the ABR, and they will continue to work on the details.

With no one else wishing to speak, the public hearing was closed at 3:03 P.M.

Commissioner's comments:

Commissioner Jordan:

- Thinks overall the project is good. The location is perfect because it is close to transit, shopping, food, and services.
- The size bulk and scale is consistent with the surroundings and the neighborhood
- The architecture is interesting. Looking at the surrounding neighborhood, it shows that you do not need to do the classic Santa Barbara architecture, and can use 'fake' Santa Barbara architecture.
- Likes the building's articulation, but is not sure about the materials. Do not need to walk far to see other uses of other types of materials.
- Likes that this project is in a location where any overflow parking will not have an immediate negative consequence on other people. It forces the parking to work.
- Does not like having to make comments on hypothetical restoration projects where the restoration is not even before the Commission.
- It is not the setback distance from the creek that is important, but what is within the setback that is important. He does not like taking a leap of faith that the creek restoration plan will be good when he is being asked to balance project impacts against negative consequences.
- Need to get creek setback numbers correct. It must be a real setback. Cannot have people standing on a patio within the 45-foot setback zone and call it a 45-foot creek setback. There should be no improvements within the identified creek setback area.

- Recognizes that there is an inherent conflict in our policy on orientation toward and use and enjoyment of a watershed, versus protection. He errs on the side of protection and would like to see that the area of habitat restoration be restricted from entry or use.
- Concerned more with what is under the building cantilever. The party area is not consistent with a restoration area.
- Reiterated that this is a great area to apply the AUD Program.

Commissioner Lodge:

- This project provides the type of housing that was hoped with the AUD Program.
- Agrees with Commissioner Jordan's concerns on the setback and what happens in that area. There is other open space where residents can have recreation.
- The building cantilever seems excessive. She would prefer to see less of one.
- There is a conflict between Creeks Division and the Upper State Street Guidelines that encourage accessibility and pathways along creeks with wanting as little human activity as possible to protect wildlife.
- Agrees with Commissioner Jordan that creeks should be given priority, so she prefers protection of the creek over use of the area.
- The AUD program is experimental. If units are not really livable, the program will fail. She appreciated that the livability of the studios is being looked at.
- Skyline trees are very important, so she would like to see the Eucalyptus Citriadora tree remain and encouraged its preservation.
- Although this project is outside the El Pueblo Viejo (EPV) area, the ABR guidelines identify distinctive Santa Barbara architecture, as does the Upper State Street Study. This project does not say Santa Barbara architecture and is totally inappropriate. She would like to see the building without the tile. Without the tile, it would have more of an eastern Mediterranean cubistic look that does fit with Santa Barbara and would be very abstract and much more timeless.

Commissioner Schwartz: She is very enthusiastic and excited about this AUD project.

- The location and number of units, however they are laid out, are appropriate.
- The Land Use Element and Housing Element clearly lay out the policies and implementation strategies that make this a perfect site for AUD. The project provides the type of rental housing encouraged by the AUD.
- ABR will ultimately decide design. She typically is open to a wide array of architectural styles. There is an opportunity to slightly soften the design to blend in with the adjacent building.
- Upper State Street, and this block itself, looks and feels more commercial. It would not be appropriate to mirror or duplicate a style that is required in EPV. There is still a ways to go to soften this project. It has an urban feeling and look, which is appropriate on Upper State Street, but looks too hard.
- She does not have a problem with the coloring. It's more the materials and the flatness on Hope Avenue. Suggested working with ABR on softening the look.

- Strongly encourages reconsidering the need for the fitness room. It uses precious real estate when there are other fitness options in close proximity. It is a rental project, so the amenities don't need to be as robust.
- Comfortable with the proposed 45-foot creek setback. Protection of the creek area is most important. A strong deterrent to use of the creek setback area is really important. It will be important not to trample or utilize that area.
- Understands the concept of special units on the pathway, but is not sure if they will work. Wants to make sure that the area is not open to the public.
- The Applicant has done an admirable and acceptable job in pulling the building envelope back from the existing condominiums.
- Agrees with Dudek, that the neighborhood is diverse and highly commercial. The design is good, but this is a transitional site. This is an opportunity soften the design and to express a transition from hardcore Santa Barbara traditional Spanish style residential look to pure commercial.
- Bicycle parking facility needs to be secured but not completely walled off so that you do not know what is going on or what is placed behind the wall. There are many examples in Colorado of bicycle parking areas that are open, yet secured.
- Appreciates the respectfulness of an out-of area owner/developer and the project team.

Commissioner Higgins:

- Supports the project. It is in a fantastic location and suited for the objectives of the AUD Program.
- Would like to know who will be renting these units. Are there area employers that need housing.
- Thinks the panhandle units will be successfully rented, even if they're narrowed slightly in order to address the path width. Need to widen the pathway to make it more comfortable for walking to State Street businesses.
- Foresees that there will be a lot more cars on Hope Avenue.
- If it's a choice between housing and creek setbacks, this is the area to favor the housing because of its proximity to transit.
- Project lines up well with most City policies. However, he does not think that USS policy 2, building dimensions and spacing, applies here because it applies to properties along State Street.

Commissioner Campanella:

- The applicant is utilizing the density well here. There are a mix of units that, by size and orientation, can provide a broad rental range.
- Applicant has done a good job in balancing the design with keeping costs down.
- Plans show sensitivity with neighborhood architecture, buildings to the north, street scene, and what could be developed to the south. The open area at the south of the building will help the project blend in when the site to the south redevelops.
- This is an overlay neighborhood, designated for potential mixed use development. There are no historical resources in the area and no single family residences to

complicate the compatibility component. La Cumbre Plaza is an opportunity site for redevelopment so the area has significant potential for redevelopment.

- Smaller compacts units are being built, but still require the same size window. Glazing will be a design challenge.

To assist Staff and the Applicant on consensus, the following straw polls were taken:

Straw Poll 1: 5/0 in support
Is the creek setback OK if it is increased to a 35-foot setback from the top of bank for habitat protection purposes only and precluding human access?

Straw Poll 2: 5/0 in support
Is the creek orientation OK?

Straw Poll 3: 5/0 in support
Is the pedestrian path OK if slightly wider and has an interesting design?

Straw Poll: 5/0 in support
If the design is softened, is the project consistent with the Upper State Street Study?

Straw Poll 4: 5/0 in support
Is use of panhandle units OK?

Straw Poll 5: 4/1 in support (Lodge)
Is the cantilever OK?

Commissioner Lodge would like to see the cantilever reduced.

Straw Poll 6: 4/1 in support (Lodge)
Is the project compatible with the neighborhood?

Commissioner Lodge does not think that the project, as designed, is compatible with the neighborhood.

Straw Poll 7: 5/0 in support
Study retention of the Eucalyptus Citriadora tree.

Additional Comments:

- Commissioner Schwartz agrees with Commissioner Jordan and suggested that the Housing Subcommittee work with Staff to define success criteria for the AUD.

Chair Campanella called for a recess at 5:00 PM and reconvened the meeting at 5:05 P.M.

V. DISCUSSION ITEM

ACTUAL TIME: 5:05 P.M.

DRAFT 2015 BICYCLE MASTER PLAN

This meeting was held for the Planning Commission (PC) to receive and review the Draft 2015 Bicycle Master Plan (BMP) table of contents, goals and policies in advance of the joint meeting with Transportation and Circulation Committee (TCC) scheduled for October 29, where the entire draft document will be reviewed.

Contact: Rob Dayton, Principal Transportation Planner
Email: RDayton@SantaBarbaraCA.gov Phone: (805) 564-5390

Rob Dayton, Principal Transportation Planner, gave the Staff presentation, joined by Peter Brown, Mobility Coordinator.

Chair Campanella opened the public hearing at 5:11 P.M.

1. Eve Sanford, Santa Barbara Bicycle Coalition, was pleased to see that the City is incorporating goals into the Bicycle Master Plan and encourages the City to build metrics into the goals for more effectiveness. Examples were provided.
2. Donn Longstreet was unable to stay and asked that his comments be read into the record. He stated that a primary policy need for the BMP is an effective interface with CalTrans to improve bicycle connections across State facilities like Highway 101. He asked that staff notify the Council in a timely manner to allow for contact with State agencies.

With no one else wishing to speak, the public hearing was closed at 5:16 P.M.

The Planning Commission was asked to comment on the following:

Goal 1: Safety for all Road Users.

- Commissioner Schwartz suggested that the BMP include measurable outcomes associated with our goals, and include timelines.
- Commissioner Higgins noted that how much implementation will cost will be important.
- Commissioner Campanella sees the need for the bicycle system to be more accessible for visitors. Encourages the same concentration of effort be made for visitors, as is being made for residents. Include families, too.
- Commissioners Jordan and Lodge asked that a paragraph be added to emphasize that improving the safety of cyclists will benefit everyone: cyclists, pedestrians and drivers. It needs to be something that someone in a car can support, not just a bike

rider. They would like the BMP to indicate the myriad of benefits it has to offer all road users, even those that don't ride bicycles.

- Commissioner Jordan suggested, once the BMP is adopted, having a working group that goes beyond bicyclist enthusiasts in order to guide BMP implementation. It could include someone from the Transportation and Circulation Committee (TCC), a Planning Commissioner, a Downtown Parking Committee Member, etc. that becomes a subset of TCC or another advisory group. The effort that is being put into this plan needs a wider set of participants, not just bike supporters.

Scott Vincent, Assistant City Attorney, left the hearing at 5:30 P.M.

Goal 2: Closing the Gaps in the Network.

- No comments were made.

Goal 3: Complete Streets & Multi-Modal Access.

- Commissioners Higgins and Jordan questioned the ambiguity in Policy 3.3 that states "other end-of-trip facilities" shall be required in private development. They asked Staff to define the term and how the policy would be implemented.
- Commissioner Higgins asked about Policy 3.5 and "equitable access" in relation to residents on the Riviera.
- Commissioner Jordan commented on the requirement for any new development to have bicycle storage, yet bicycle parking may not be well-designed and there is no way of knowing if storage areas are being used effectively. The Planning Commission needs guidance on what type of bicycle storage is secure and guidelines for how to incorporate appropriate bike parking for different types of new development. The Commission needs specificity so that it knows what to approve in future projects.
- Commissioner Schwartz felt that there were redundancies in the six policies under Goal 3 and asked that Staff look into having policies consolidated.
- Commissioner Schwartz wants to see collaboration and partnerships with other sectors (private, non-profit) included in the BMP to encourage and support building the BMP as a community-wide amenity.
- Commissioner Schwartz encouraged having a package of multi-modal resources that could be given to private development applicants to encourage development of bicycle solutions. This would be part of strategic outreach and communication.
- Commissioner Higgins asked that Staff look at Policy 3.3 and build in some flexibility for the different types of development projects. Suggested researching what types of commercial projects generate more bicycle demand, similar to a parking demand study.
- Commissioner Higgins asked staff to clarify the purpose of the policy geared to promote Santa Barbara as a bicycle friendly community.
- Commissioner Higgins suggested having bicycle racks/lockers at the Airport for cyclists that use the airport.

Goal 4: Develop Santa Barbara Style Bicycle Infrastructure.

- No comments were made.

Table of Contents:

- Commissioner Jordan noted that Impact Analysis is his main concern, and that's at the very end. It is the least developed section so far. That section should clearly reference back, by citation, to the impacts related to a goal or to the 20 projects that you will list; not just generic impacts.
- Commissioner Lodge suggested that "How to Use this Document" be moved closer to the front of the section "What is the Plan and why are we doing it?"
- Commissioner Schwartz asked for policy connectivity between the BMP and the General Plan goals and policies that support the BMP.
- Commissioner Higgins stated that many more people are using smart phones over reading printed documents and suggested that interactive web technology be used.

Mr. Dayton and Mr. Brown thanked the Commission and look forward to seeing the Commission again at the Joint Planning Commission and Transportation and Circulation Committee meeting on October 29, 2015.

VI. ADMINISTRATIVE AGENDA

ACTUAL TIME: 6:00 P.M.

A. Committee and Liaison Reports

1. Staff Hearing Officer Liaison Report

   Commissioner Jordan reported on the Staff Hearing Officer meeting of September 16, 2015. He will report on the September 30, 2015 meeting next week.

2. Other Committee and Liaison Reports

   a. Commissioner Lodge reported on the Historic Landmarks Committee meeting of September 23, 2015.

   b. Commissioner Campanella reported on Architectural Board of Review meeting of September 28, 2015.

   c. Commissioner Campanella reported on the Sustainability Committee meeting of September 24, 2015.

   d. Commissioner Campanella reported on the Downtown Parking Committee meeting of September 10, 2015.

   e. Commissioner Campanella reported on attending a recent Housing Subcommittee meeting.

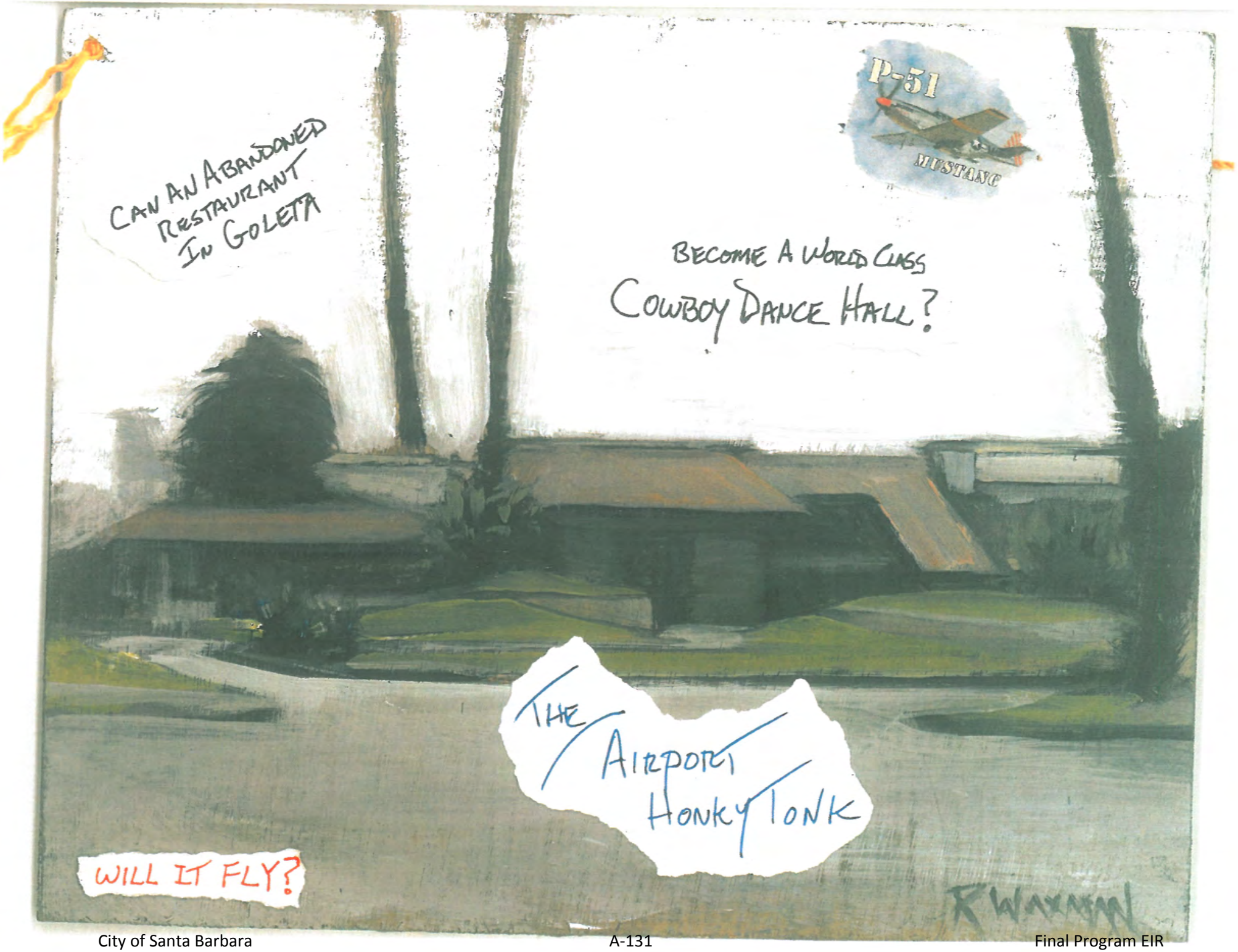
   f. Commissioner Campanella reported on the Multi-Design Guidelines Subcommittee meeting of September 29, 2015.

VII. ADJOURNMENT

Chair Campanella adjourned the meeting at 6:10 P.M.

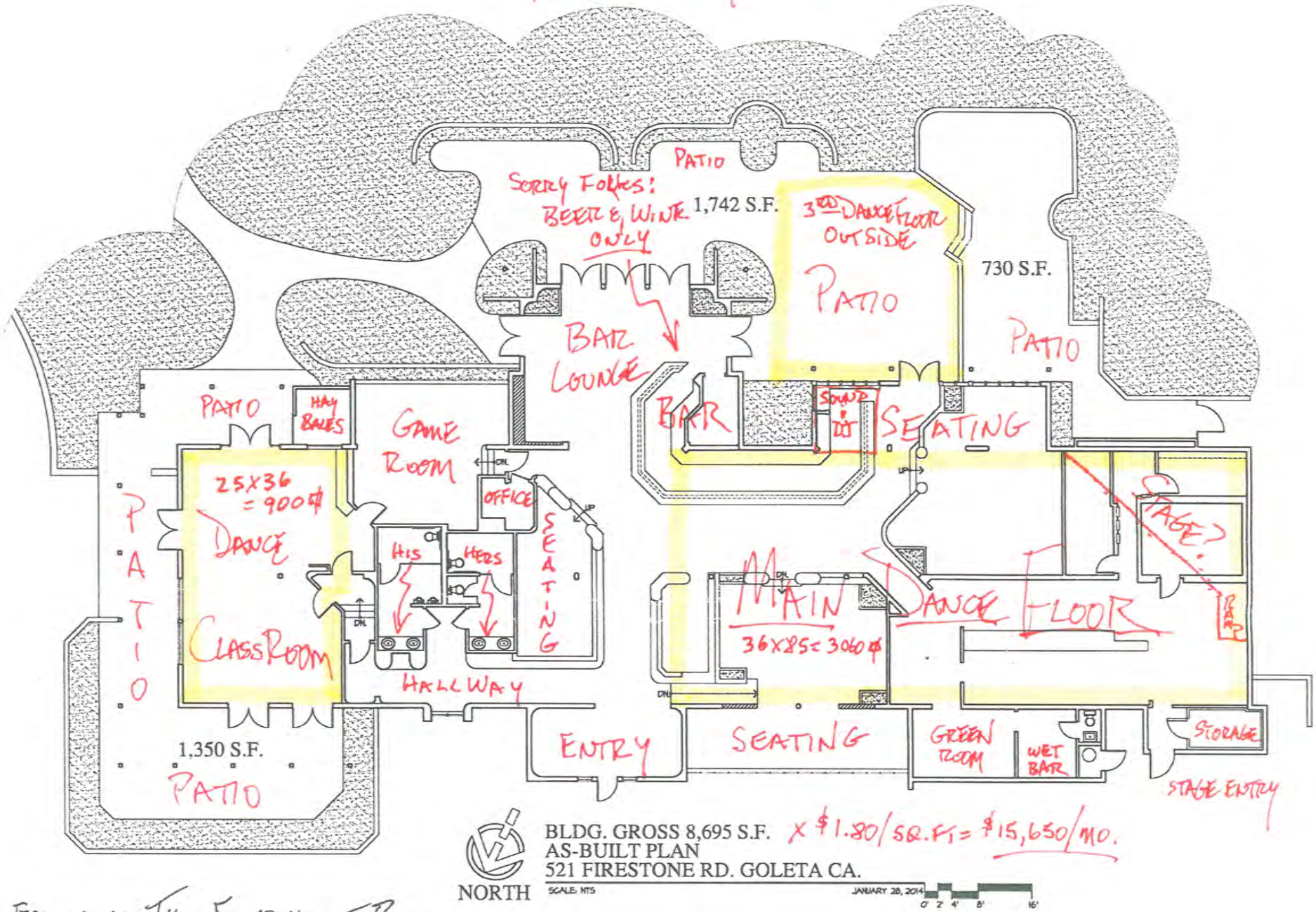
Submitted by,

Julie Rodriguez, Planning Commission Secretary


CAN AN ABANDONED RESTAURANT IN GOLETA
P-51
MUSTANG
BECOME A WORLD CLASS
COWBOY DANCE HALL?
THE AIRPORT HONKY TONK
WILL IT FLY?

2/14/14

THE AIRPORT HONKY TONK



BLDG. GROSS 8,695 S.F. X $1.80/SQ.FT = $15,650/MO.
AS-BUILT PLAN
521 FIRESTONE RD. GOLETA CA.
SCALE: NTS
JANUARY 28, 2014
0' 2' 4' 8' 16'

FORMERLY THE ELEPHANT BAR

FEASIBILITY STUDY

521 Firestone Road, Goleta CA

Subject: Conversion of Said Structure into a Nonprofit Dance Hall (501.c3)

Recommendation: That Council authorize the Santa Barbara Airport Authority to lease the property to **The California Country Dance Foundation**.

PROPERTY DESCRIPTION

1. Subject: Pertinent Facts

Recommendation: That Council read this stuff first; and yes, I plagiarized your agenda.

Subject property is a multi-level single story 8,695 square foot building approved July 8th, 1981 as an executive flight terminal & food service facility. It became "The Elephant Bar" circa 1982.

Said property is owned by The City of Santa Barbara via the Airport Authority, as are the vacant lots immediately north of the intersection with Hollister.

Current status is as a vacant structure in need of minor repair, for lease by Radius Commercial Realty - asking $1.80 per square foot; seeking a 5 to 10 year+ lease.

2. Subject: Location Assets

Recommendation: That council lease to a regional draw, think "Theme Park"

This location would appear to be ideal for a regional draw to establish roots in Santa Barbara. It's close to several colleges; it's accessible by planes, trains, buses & bike lanes. There is abundant parking available. The vacant lots could be incorporated into a country music & dance "theme park" of sorts, which drive traffic to each other.

3. Subject: Location Liabilities

Recommendation: Think big; vote for something new & exciting.

As an isolated restaurant adjacent to Old Town Goleta thrift stores to the east & industrial/office properties to the north, there is the impression that your run-of-the-mill eatery will be marginally – if at all – profitable. The Elephant Bar vacated after 30 years to seek greener pastures, thus the vacancy – and the question – what is the highest & best use if not as a restaurant, and what steps are necessary for a conversion?

PROPOSED USE

1. Recreational Facility

The primary function of The Airport Honky Tonk will be to provide habitat for all ages to couples dance to country music. Line dancing will be encouraged (when called) too! This project will be genre specific, however, with little or no hip hop, rhythm & blues, ballroom, etc. Build your own ballet studio; funding will be from The California Country Dance Foundation. Catered luncheons will be available for service organizations where they may participate in our magnificent habitat with alternative dances, but afternoons & evenings will be contemporary country exclusively. It's not meant to be "fair".

2. Dance Classroom

Learning the 5 Basic Country Couples Dances should be an essential step in the lives of all young (and old) males in Santa Barbara County. If we teach 10, the world will be a better place. If we teach 10,000, we become the West Coast destination for dance. That's right. Santa Barbara (Goleta) California becomes The west coast destination for couples dance. I don't know about you, but I think that's downright exciting.

A) The Two Step The two step is by far the most popular dance in The USA. It is danced in every state every night to the most popular music in America - Country music. All males 13+ should know these basic steps; sorry - girls are not allowed to lead.

B) The Cowboy Cha-Cha This dance is the most fun & the most romantic. Boys that have mastered the Cowboy Cha-Cha will be dance gods for the rest of their life. I didn't make that up. Ask the cowgirls.

C) The West Coast Swing Another popular dance with the ladies (aren't they all?). The gal struts back & forth on a "railroad track" while the guy leads & stays outta their way. Guys - learn 6 or 7 basic moves and every female in the room will ask YOU to dance. Consider yourself warned...

D) The East Coast Swing Also called the Free Style Swing, you can literally throw gals between your legs, around your back & lift them to your shoulders if you'd like. A bit cheerleader athletic in it's rowdiest form, but it is essential & the chicks dig it once you get good enough to not drop em.

E) The Waltz I don't like the Waltz too much cuz of it's unusual 6 count beat, but "Momma's Don't Let Your Babies Grow Up to Be Cowboys" by Willie Nelson is a Waltz, so we must teach it to our youth forever. Rules are rules.

That's it. Nothin else but a Shottish or 2. One dance hall, 1 genre, very simple indeed.

3. Live Music Venue

This is where I get really excited. We have live bands playing country tunes every night after 8:00 pm. New bands, old bands, local ones, world famous ones, you don't really need to be a "country band". Any group that can put together a 10 song country dance set is invited. Think Los Lobos, Jack Johnson & Wilson Phillips for example... The cover charge may be a tad higher if we have Brad Paisley in "the house", but that's OK with me. Provide habitat for live musicians to actually play & get paid well for their efforts to help everybody learn to dance. What a thought – I absolutely love it. Teen bands play before 8:00, adult bands (with beer & wine) in the evenings. Our day class rooms may even teach guitar, drums, song writing & singing, so your kid could start a band & play in front of their friends. Where else can they do THAT? Fun, Fun, Fun!

4. Non Profit Corporate Employer

Price to the public should be low, employment opportunities should be $15+ per hour There shall be no $6 dollar beers or hamburgers. There will be no cost for dance lessons; there will be no cover unless we have a live band. As a non profit, we are not entitled to make money off of anything, certainly not drink prices. Everything including beer & wine (tiny selection) will likely be $3 across the board except for things like hot dogs & sodas, which would be two for $3. Simple cheap fun combined with educational exercise at a location that is accessible & nearby to as many folks as possible.

5. Highest & Best Use of Structure

How do you define the highest & best use of 521 Firestone Road? Is it always a Starbucks or a Hooters? Are there deeper subjects such as habitat for the community here? Why should anyone care, It's up to the Realtor & the Airport Authority, right? I say it's not up to them at all; it's up to the Santa Barbara City Council to make the call.

CONVERSION ISSUES

The elimination of interior food service would appear to be the most significant objection to this project. 521 Firestone Road was envisioned & built as a restaurant & lounge amenity to the executive flight terminal.

Food service for The Airport Honky Tonk will be provided via external sources such as lunch trucks or by our many catering options. Luncheons would rely on catering, while the 4 pm to 12 pm shift would be from food trucks. If you've ever been dancing, there's nothing worse than chicken wings, forks & plates with the constant emphasis on serving non dancers in search of profits. Please eat on one of our outside patios by the BBQ or lunch truck & come back inside to dance after you've washed your hands.

Proforma Cost of Conversion

1. Demolition

The west half of the structure must be demoed to remove the existing kitchen & roof. Saving key fixtures & stainless steel may be prudent in the event said structure reverts back to a full service restaurant in the future (see closing comments).

Estimate **$16,500**

2. Trussing & Reroofing

4 x 4 posts adorn the center line of our main dance floor & stage. Upon completion, there will be nothing to your right as you enter other than a 36' wide trussed ballroom that looks like a barn with a stage to the rear.

Estimate **$23,500**

3. Installation of Hardwood Flooring

Main Dance Floor	36" x 85" = 3,060 sq. ft.	$20,000	
Class Room(s)	36' x 25' = 900 sq ft	7,500	
Patio dance floor (removable)	900 sq ft	7,500	
Almost 5,000 sq. ft. of hardwood!		Estimate	**$35,000**

4. Decor & Fixtures

Start up items will be sparse with décor leaning toward a country western theme such as horse shoes, hay bales & old pictures of famous people in cowboy hats arriving at The Santa Barbara airport, etc. We'll add spectacular items as we go.

Estimate **$7,500**

5. Plans, Permits and Beer & Wine License

Estimate **$17,500**

6. Restroom expansion

Four patio Porta Potties need to be leased; two for the ladies, 2 for men.

Total Cost for Conversion **$100,000**

OPERATION FUNDAMENTALS

The Airport Honky Tonk will be operated as a non profit corporation. Days will be available for catered luncheons. These time slots in particular may feature dance other than country. Heck, people can fly in for belly dance conventions – let's tear it up! Unfortunately for alternate genres, afternoons & evenings will be couples dance to country music.

Afternoons will concentrate on teaching teenagers the basic dances, while evenings after 8 pm will be for those over 18. Hourly dance classes will always be free of charge. Did you catch that? FREE dance classes on the hour, 7 days per week.

PUBLIC OPINIONS

1. The Beatles sold out Shea Stadium in 1963 to 15 year olds, mostly girls. Provide for them, they need it more than ever - you'll succeed if you do. -Bingo Noone

2. Great idea, maybe I can write a letter of recommendation – send me bullet points in an email. -Ginny Brush, County Arts Commissioner

3. Thank you for your efforts on the Airport Honky Tonk. My girlfriends & I did a survey on what we wished our husbands did for us over the years. Flowers? Vacuuming? Dishes? Nope, turns out the #1 answer was "Take Us Dancing".
-Random caller from Montecito Journal ad

4. Provide us with habitat to dance with each other 7 days a week? Off the chart unbelievable! The entire building? We don't have to be 21?
-Santa Barbara City College students

5. Not much couples dancing tonight, just hip hop & rock-n-roll? That's right, dancers don't pay my bills. -Maverick Saloon owner at Rancheros Vistadores event

6. Does anyone <u>not</u> like the idea? -Dude at Polo Grounds event

7. Do you know of any boys that know how to lead? Thinks a second. Yep. His name is Andrew. Do any of your girlfriends know how to lead? Oh yeah, we all do. We have to.
-Coffee shop cowgirl

8. We'd rather eat burgers with 300 frisky dancin cowgirls than be served steak from 10 Hooters gals. -Airport pilot survey *

9. Likely not a law enforcement problem as per <u>Coffee with a Cop</u>. Security must meet guidelines; contact our Goleta Community Resource Deputy for details.
-Local SBPD & Sheriff Deputy's

10. My 16 year old grandson can book gigs there? I love it! -Joanie Green, local CPA

***OK, I made that one up**

11. No sweat - loaning 10% of our county surplus to The CCDF for an all ages dance hall sounds politically correct. Who do I write the $180k check out to? How do you spell Clint Orr? -New Santa Barbara County CEO**

FINANCIAL ABC'S

No, our hero Clint doesn't own a Bentley, so conventional wisdom dictates that reading beyond this point is senseless. Yet there are those of us that dare to dream of altering the course of society while maintaining a modest life style.

As a California Real Estate Broker for 25 years & as a degreed accountant, I have always found that when "The Deal" makes sense, the money flows to it. The escrow would close & I would get paid at the end of a well-documented project, not at the opening bell. Most escrows would take months of financial applications & inspections before keys could be exchanged. I'm prepared for that & will exercise great care in delivering said documentation & financial support – given the opportunity by City Council.

We will seek no subsidies from city, county, state or federal agencies other than possible corporate loans or lines of credit until repaid. We'll make it on our own. The high road will be a brick by brick iter that is built on the solid ground of family trusts throughout the state of California that see the value, as do I, of teaching family values & social skills to our youth (and adults). It's that simple.

Proforma Receipts (Fiscal Year July 1, 2014 - June 30, 2015)

1.	**Family Trust Endowment**	(675 pound gorilla in the room)	$675,000
2.	**Reasonable Corporate Debt**	(multiple Sources)	$200,000
3.	**Crowd Funding**	(3 to 6 campaigns)	$200,000
4.	**Book Sales**	(not gonna happen)	$200,000
		Total Receipts	**$1,275,000**

That's a whopping $3 per person in Santa Barbara County - almost 2 bus fares each.

Proforma Outreach (Hey, we're here to lose money, so let's get started!)

1.	**Squander Dough on Airport Honky Tonk Operations**	($180,000)
2.	**Squander Dough on State HQ at 1101 Coast Village?**	($360,000)

The rest of our resources will be blown on employment, fund raising, travel, dancin girls, pizza & whatever the board of directors cuts them checks for. I'm just the executive director.

**OK, I made that one up too & make checks out to the CCDF...

Break Even Analysis

Rent	*$500/day
Security	$1,000/day
Staff	$750/day
Util/Supplies	$500/day
Misc	$250/day
	Daily Overhead $3,000

Projected Daily Visit Income

Days 4-8 pm	200 students per day @ $5 apiece =	$1,000
Eve's 8-12 pm	200 adults @ $10 apiece =	$2,000
	Daily Income	$3,000

***Rent will be paid by the CCDF, structure capacity 500 to 850 SRO, Friday & Saturday visits may pay for entire week...**

CONCLUSIONS

Infrastructure for couples dance just flat out does not exist in Santa Barbara County. Look around you. Where would you go dancing tonight? You probably could not.

- Tens of millions are devoted to the performing arts such as tap, jazz, ballet, theater & orchestra, yet no resources whatsoever are provided for your kids & grand children to dance with each other to the greatest art of them all – couples dance.
- This fine country was founded by a gentleman who excelled in etiquette & dance. Where are we now? Cell phones, raves & Deltopia is all that our youth is offered.
- My request is that The CCDF be given the opportunity to level the playing field – with few conditions – except for a B.O.D. appointee & approval of our treasurer candidate.

CLOSING COMMENTS

Lease the structure to the CCDF for 3 years with a 2 year option as we seek to expand across Hollister in 2017-2019. The intersection could easily support a steakhouse, a western wear purveyor & maybe an arcade with a carousel. The down side is minute; the up side could be spectacular. A genuine game changer for society in Santa Barbara is on the table today.

FEASIBILITY STUDY CONCLUSION

MOVE OVER BAKERSFIELD

We must work together as a dream team to make **Goleta,** California the west coast destination for country music & couples dance. I'll build our team; you provide a temporary stadium until we build a proper arena.

LETS WORK TOGETHER TO:

1. Empower our youth with something new & exciting (it's been around forever).
2. Teach responsible USA dance basics For Free every day.
3. Encourage people to ditch their cell phones for a few hours.
4. Provide a stage for all those that dare sing country.
5. Get ready for a theme park to blossom. Hold onto your hats.
6. Open Healthy Happy Habitat for all ages at a central county transportation hub that will likely increase revenues for all around it & pay for itself – kinda like redevelopment.

THE AIRPORT HONKY TONK

Where everybody's a dancer & everybody's a star; and everybody's a cowboy (or cowgirl), no matter who you are…

As your coach, the executive director of The California Country Dance Foundation and as always the best dancer in town, I'll do my honest best not to drop the ball, and I end this feasibility study with the magic word –

Please

Approve this plan.

Clint Orr.

Response to Oral Comment 2, Matthew Clint Orr (ORR), California Country Dance Foundation
City of Santa Barbara Planning Commission Hearing
October 1, 2015

ORR-1: Encouraged the City to incorporate a regional dance hall auditorium at the northeast corner of the intersection of Frederick Lopez and Hollister Avenue into the Airport Master Plan. Submitted attachments introducing the proposal.

Response: The proposed dance hall site is located outside of the Master Planning area, which is focused on the south side of Hollister Avenue. Rather, the northeast corner of Frederick Lopez and Hollister Avenue is within the Airport Industrial Specific Plan area. Although the Airport Master Plan does not include this area, it would not preclude the commenter from pursuing his project through the normal City development processes.

Response to Oral Comment 3, Tom McGregor (McG), Accurate Aviation
City of Santa Barbara Planning Commission Hearing
October 1, 2015

McG-1: Represents Accurate Aviation, which has been a tenant at the Airport since 1984. Is concerned with the removal of Atlantic Aviation and its replacement with a parking lot, especially related to traffic impacts in relationship to development in Goleta. Stated that the City of Santa Barbara needs to coordinate with the City of Goleta on issues related to traffic

Response: The proposed Master Plan recommends the relocation of fixed base operators from south of the commercial terminal to the north side of the airfield. Additional parking could then be constructed south of the commercial terminal if, and when, demand based on increased commercial activity at the Airport occurs. Increased commercial activity at the Airport has been included in both the City of Santa Barbara's and the City of Goleta's cumulative growth scenarios for traffic modeling purposes. In addition, the traffic impact study for the Draft EIR addressed changes in these cumulative growth forecasts based on the redistribution of trips related to the relocation of fixed base operators to the north side of the Airport.

McG-2: Stated his opinion that the Airport will not become the commercial airport that is projected to occur in the Master Plan.

Response: Comment noted. As discussed in the Master Plan, the document is a demand-driven planning document, meaning that projects recommended for the future based on growth in airport activity will not be pursued if the Airport's growth projections are not realized.

Response to Oral Comment 4, Robert James Trimble (RJT)
City of Santa Barbara Planning Commission Hearing
October 1, 2015

RJT-1: Concerned with the recommended demolition of the Marine Corps hangar located on the south side of the commercial terminal.

Response: The Draft EIR included an evaluation of the historical significance under federal, state, and local regulations of all historical structures that could be affected by the recommended development concept of the Master Plan, including Building 121, also known as Squadron Hangar No. 5 (refer to Section 4.3.4, Marine Corps Air Station Goleta Buildings). Based on the criteria set forth in the National Register of Historic Properties, the California Register of Historic Resources, and the City of Santa Barbara Landmark/Structure of Merit eligibility criterion, the building referenced in this comment did not retain sufficient historic integrity to convey its historical significance and, thus, warrant protection under these protective registers. That does not mean that the building is not representative of an important period of history, but that it is not necessarily historically significant given the large number of properties still intact that are associated with World War II and the training of troops.

Appendix B

Appendix B
AGENCY AND PUBLIC COMMENTS AND RESPONSES ON THE RECIRCULATED DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

The Recirculated Draft Program EIR was made available for public and agency comment from July 15, 2016, to September 13, 2016. Public comment on the Recirculated Draft Program EIR was also received at an Airport Commission meeting on July 20, 2016, and a City Planning Commission hearing on September 1, 2016. A total of 16 written comment letters or emails and three oral comments were received. Two of the oral comments received were followed up with submittal of the comments in writing.

This appendix contains all public comments received on the Recirculated Draft Program EIR during the official public and agency review period, as well as written responses, and is organized as follows: First, general responses are provided to certain reoccurring comments that were raised in response to the Recirculated Draft Program EIR. Second, all comment letters or emails received during the official public review period have been reproduced and responses have been provided for specific concerns or questions. (NOTE: Where a comment is a duplicate comment to one received on the Draft Program EIR, the response may refer the reader to the response provided to the duplicate comment in **Appendix A** of this Final Program EIR.) Third, minutes of the two public meetings/hearings held on the EIR are included, with specific responses to the oral comments.

The following is a list of all comment letters, emails, or oral comments that were received during the official Recirculated Draft Program EIR public review period:

NAME/ORGANIZATION	DATE	COMMENT	PAGE
Written Comments:			
1. Carl Hopkins (via email)	July 16, 2016	CSH-9 - 13	B-5
2. Public Utilities Commission	July 19, 2016	PUC-5	B-9
3. Santa Barbara County Association of Governments	July 21, 2016	SBCAG-7 - 10	B-11
4. Santa Barbara County Air Pollution Control District	August 2, 2016	APCD-5 - 6	B-16
5. Freddie Romero, SYBCI Elders Council (via email)	August 3, 2016	FR-1	B-19
6. U.S. Dept. of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service	September 6, 2016	NMFS-1 - 20	B-21
7. Santa Barbara Audubon Society	September 8, 2016	AUD-33 - 55	B-39
8. Goleta Slough Management Committee	September 9, 2016	GSMC-30 - 38	B-56
9. California Department of Fish and Wildlife	September 12, 2016	CDFW-19 - 54	B-64
10. Santa Barbara Channelkeeper	September 12, 2016	SBCH-5 -13	B-96
11. California Coastal Commission	September 12, 2016	CCC-1 - 2	B-103
12. California Department of Transportation	September 13, 2016	DOT-1 - 2	B-106
13. City of Goleta	September 13, 2016	GOL-79 - 92	B-110
14. Central Coast Regional Water Quality Control Board	September 13, 2016	RWQ-1 - 11	B-130
15. Mark Holmgren	September 13, 2016	MH-1 - 14	B-139
16. Heal the Ocean	September 16, 2016	OCEAN-13 - 17	B-154
Oral Comments:			
City of Santa Barbara Airport Commission minutes	July 20, 2016	None	B-161
City of Santa Barbara Planning Commission minutes	September 1, 2016		B-164
- Carl Hopkins (Airport Commission) Presentation Materials			B-172
- Gordon Feingold		GF-2	B-181
- Jenna Driscoll (Santa Barbara Channelkeeper)		SBCH-14	B-182
- Scott Cooper (Audubon)		AUD-56	B-183

TOPICAL RESPONSES

General Comment #1: Foraging habitat for white-tailed kite (*Elanus leucurus*), a State of California Fully Protected species, should be afforded the same protection it is given by the County of Santa Barbara in the County Local Coastal Plan (LCP), and its loss be considered a cumulative impact.

Topical Response #1: A technical memorandum has been prepared to evaluate the potential for project-specific or cumulative impacts to foraging habitat for the white-tailed kite, specifically from the future Taxiway H Airfield Safety Project (Final Program EIR, **Appendix C**). This project is

recommended in the proposed Airport Master Plan and would extend the existing Taxiway H to the west end of Runway 7-25. The project could involve the permanent loss of approximately 6.1 acres of brome grass vegetation due to new pavement for the taxiway and shoulders.

The analysis concludes that although brome grasses like those present at the proposed Taxiway H project site are considered to provide suitable foraging for kites, a lack of small mammals (based on recent trapping efforts), an absence of kites in the area north of the runway (during a year-long survey effort), and the distance of the Taxiway H project site from known nest locations (Final Program EIR, **Appendix C**, **Figure 1**) suggest that the area only provides low-quality foraging habitat for nesting white-tailed kites. While approximately 498 acres of suitable kite foraging habitat has been, or is anticipated to be, impacted in the region by past, present, or probable future projects (Final Program EIR, **Appendix C**, **Table 1**), there are over 4,500 acres of annual grasses and forbs within the cumulative study area (Final Program EIR, **Appendix C**, **Figure 2**). Relative to the amount of available habitat in the region, the loss of 6.1 acres of low-quality foraging habitat (1.2 percent of anticipated lost acreage in region) is considered less than significant, both on a project-specific and cumulative level.

General Comment #2: Proposed mitigation areas for the Taxiway H Airfield Safety Project should include higher ratios for wetland and upland impacts.

Topical Response #2: A Programmatic Mitigation Plan (PMP) for impacts to sensitive habitats has been revised in response to input from the California Department of Fish and Wildlife (CDFW) and the California Coastal Commission (CCC). A technical memorandum regarding the program and the characteristics of the proposed mitigation areas is included in this Final Program EIR as **Appendix D**. Revisions to the PMP have also been incorporated into BIO/mm-1 of the Final Program EIR (Section 4.2.7). The PMP (i.e., BIO/mm-1) includes a minimum 4:1 ratio (restoration to impact) as mitigation for wetland habitat and/or wetland/riparian buffer impacts and a minimum 3:1 ratio (replacement) as mitigation for upland (i.e., grassland and shrubland) habitat impacts consistent with the current Airport Local Coastal Plan (LCP). The mitigation shall be in a form and location acceptable to the applicable permitting regulatory agencies and will be determined as part of project-specific Habitat Mitigation and Monitoring Plans (HMMPs).

Included in the map of potential on-airport mitigation areas (Final Program EIR, **Exhibit 4D**) is an area outside of the current Goleta Slough Ecological Reserve (GSER) boundaries, which is specifically called out in the Airport's LCP (City of Santa Barbara 2003:3-11) where it states:

> "Twenty-one acres in the south west corner of the intersection of the east/west and north/south runways are designated as potentially restorable marsh on the habitat map. During an informal site investigation with the Department of Fish and Game and Coastal Commission staff members in spring 1981, this portion of the slough was observed as upland habitat. Since the informal site visit, detailed habitat mapping of the slough has been completed (as shown on the special study area on the habitat map) however this area in the corner of the runways was not included in that habitat mapping. There has been no

documentation that this area is anything other than potentially restorable marsh. Therefore, this area will be considered potentially restorable marsh so that it may possibly be restored or improved to offset impacts of development in other sections of the City's Airport property in the future."

Additional specific comments regarding the PMP were discussed with the CDFW during a field visit on April 13, 2017. The Final Program EIR (BIO/mm-1) contains measures from the revised PMP that includes measures for both wetland and upland impacts. The final PMP reflects both discussions between the Airport and the CDFW on the Department's concerns identified in their comment letter and during a field visit (April 13, 2017) of the Taxiway H Airfield Safety Project site and proposed mitigation areas (Final Program EIR, **Exhibit 4D**).

General Comment #3: Mitigation for the future proposed Taxiway H Airfield Safety Project should include a requirement to prepare a project-specific Environmental Impact Report (EIR).

Topical Response #3: Because this EIR is a Program EIR on a planning document (i.e., the proposed Airport Master Plan), detailed project-specific analysis and the development of an appropriate project-specific mitigation program, as well as associated analysis of project consistency with the Goleta Reserve Zone (G-S-R) and the policies of the Airport's LCP, will be conducted as part of the Coastal Development Permit and LCP amendment/General Plan amendment/rezone process for the Taxiway H Airfield Safety Project. Although this is already required for project approval by the *California Environmental Quality Act* (CEQA) as well as the Coastal Commission, the City of Santa Barbara, and other responsible agencies with discretionary oversight, it has been formalized in the Program EIR as LU/mm-1. This specifies the requirement for additional environmental review of future projects to be part of the Program EIR's mitigation, monitoring, and reporting program.

In fact, all projects recommended in the proposed Airport Master Plan that meet the definition of a project under CEQA and need future discretionary approvals will be required to complete some level of environmental review. However, it is not appropriate for the type of environmental document to be determined at this time when neither the timing, the scope, or the design of such projects are available.

Bermond, Andrew

From: Carl L Hopkins <CarlLHopkins@cox.net>
Sent: Saturday, July 16, 2016 11:03 AM
To: Johns, Hazel
Cc: Bermond, Andrew
Subject: Re: Master plan and EIR

I get back Tuesday afternoon.

I can meet anytime Wednesday. It would be very helpful, if there are any documents like comments and replies or layouts, if I could review them ahead of time.

I do understand the 'broad brush" idea, but I do consider the goals of the master plan to be pretty much 'set in stone'. So I consider the idea of transient parking and flight schools, a wash rack for light GA, and a maintenance place all to be set in stone. What is not necessarily set in stone from my view point is exactly when, where, and how they will be implemented. But I believe it is important to make sure the EIR and final plan do not prevent their future implementation. My concern now is that we will end up with a plan now that does not allow future implementation. I don't want to approve a plan now and then in a couple of years when we go to implement some details find out we can't! CSH-9

This entire process had taken a long time. Certainly a lot longer than I ever anticipated. But I would rather spend the time, even more time, and get it right than 'rush' it and get it wrong.

Let me know when/if you can meet Wednesday and if there are any documents I can review first.

Thanks..... Carl

Sent from my iPad

> On Jul 16, 2016, at 11:47 AM, Johns, Hazel <HJohns@SantaBarbaraCA.gov> wrote:
>
> Carl I think it would be good to meet with me and Andrew to discuss again the master plan, its implementation , funding, and future steps. Keep in mind the original master plan is a broad brush look at possible projects it is not set in stone. Let me know if you have time to meet before the commission meeting. Hazel
>
> Sent from my iPhone
>
>> On Jul 16, 2016, at 10:22 AM, Carl L Hopkins <CarlLHopkins@cox.net> wrote:
>>
>> Hazel,
>>
>> I am on vacation but will be back for the meeting.
>>
>> I was surprised at the agenda and release of the revised EIR before the commission had a chance to review it. I also have not been able to find a lot of information that I would want to see. I believe there were a number of comments made on the first EIR. I know I made one. It was my understanding that thee would be a written response to each of those comments before or as part of the revised EIR. I cannot find such a document and I have not received any response to my comments. CSH-10
>>

» When I or anyone else looks online the master plan document is as it was before the first EIR. I could not find anything online indicating that the hangers 1, 2, 3 would remain. This is very misleading at this point. Any pilot who has been following this, and there are many, would think the NOAA site was going to be a wash rack and small plane maintenance site and the three hangers were going to be removed providing space for the school planes and transient parking and access to a new set to T hangers. CSH-11

»

» My comments were mostly concerning the unacceptability of keeping the WWII hangers, especially hanger #1. If we don't get rid of hanger #1 there will not be room for 2 or 3 flight schools and transient parking! I was told that the EIR could not demand the removal of the hanger because there was room for the schools and transients with the hanger. When I questioned that I was told Coffman would provide a detailed drawing showing the 46 transient spaces called for in the master plan plus the two dozen or so school planes. I still do not have such a drawing or any kind of such layout. And I don't believe there is room for them!

»

» I continue to be very concerned that the master plan will end up with totally inadequate small GA space. The NOAA site has already taken over the space planned for the wash rack and small plane maintenance site. This is extremely important to me and to a large number of local pilots. I have been telling them for several years: "Wait! We are working on it. We WILL have transient parking and a place to work on and wash our planes." CSH-12

»

» But now I am not at all certain. I am concerned that you do not share my support for the small GA part of the master plan.

»

» IF there is a list of all the original EIR comments and responses, please send it or a link to it to me. IF there is a layout of transient and school planes, please send it to me. I don't get back until Tuesday but except when I am flying, I can get e-mail and make phone calls. CSH-13

»

» Thank you..... Carl

»

» Sent from my iPad

Response to Recirculated Draft Program EIR - Email 1
Carl Hopkins (CSH)
Dated July 16, 2016

*CSH-1 through CSH-8 are included in **Appendix A** of this Final Program EIR.*

CSH-9: This comment states that proposed Master Plan goals for the general aviation (GA) area of the Airport (for example, transient parking, flight schools, a wash rack for light GA, and a maintenance area) are "set in stone." However, the commenter is concerned that changes made to the Master Plan through the EIR process will prevent these items from being implemented.

Response: Comment noted. Through the environmental process, impacts to historic resources were identified and the proposed Master Plan was revised to allow these resources (i.e., WWII hangars) to remain in the north GA area. In addition, space was reserved for the future relocation of two historic hangars currently located within a regulatory floodway. These changes have required some modification to the north GA area from what was originally planned in earlier drafts of the proposed Master Plan.

CSH-10: This comment asks where the commenter can read the responses to his previous letter on the Draft Program EIR.

Response: Refer to **Appendix A** of the Final Program EIR, Letter 7, responses to comments CSH-1 through CSH-8.

CSH-11: This comment states that the Airport Master Plan website still shows the document as proposed before it was revised per the environmental review process.

Response: Comment noted. Prior to the Final Program EIR being taken to the City Planning Commission for certification, the changes to the draft Final Airport Master Plan will be posted on the study website.

CSH-12: This comment summarizes the primary concerns of the previous comment letter, namely that keeping the Airport's World War II hangars (especially No. 1 [referred to as Building 317 in the Draft Program EIR]) will not allow room for flight schools and transient parking on the north side of the airfield. The commenter is concerned about the amount of future space that will be available for small general aviation aircraft.

NOTE: The Commenter, as Airport Commission Chair, also presented a Power Point representing the Airport Commission's position regarding the retention of the World War II hangars at the City of Santa Barbara Planning Commission hearing on September 1, 2016. Portions of his presentation are appended to the Planning Commission minutes included later in this appendix.

Response: This comment is similar to Comment CSH-2 in **Appendix A** of this Final Program EIR. Because the structure(s) in question are eligible for listing as "Structure(s) of Merit" by the City of Santa Barbara's Historic Landmarks Commission (HLC) under the authority of the City's Historic Structures Ordinance (Chapter 22.22 of the Municipal Code), they are considered historical resources under the *California Environmental Quality Act* (CEQA). For this reason, the draft Airport Master Plan was revised to show the hangars as being retained. If, in the future, the Airport proposes to remove one or more of these buildings, additional environmental review will be necessary and mitigation and/or Findings and a Statement of Overriding Considerations (per CEQA Guidelines, Sections 15091 and 15093) provided, as appropriate, as part of a subsequent approval process.

CSH-13: This comment asks for a link to all the original Draft Program EIR comments and responses as well as a layout of transient and school planes.

Response: See Response to Comment CSH-9 regarding the Draft Program EIR comments and responses. These are provided in **Appendix A** of this Final Program EIR.

The proposed Master Plan does not contain detailed layouts of aircraft within the proposed GA apron areas, but rather uses guidelines contained in FAA Advisory Circular 150/5300-13A, *Airport Design* (FAA 2014), to determine the amount of apron space likely to be needed based on forecast levels of activity. Planning criteria of 600 square yards (sy) of apron per single and multi-engine aircraft and 1,600 sy per turbine aircraft position have been used to estimate locally based aircraft apron needs (Table 4K, draft Airport Master Plan). The Airport currently has a total apron area of 156,500 sy, which is more than the projected long-term demand (131,300 sy). It is not anticipated that the retention of the two WWII hangar Nos. 1 and 2 will have an adverse impact on the Airport's ability to accommodate future apron demand.

STATE OF CALIFORNIA — EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
(213) 576-7083

July 19, 2016

Andrew Bermond
City of Santa Barbara
601 Norman Firestone Road
Santa Barbara, CA 93117

Dear Andrew:

Re: SCH 2014061096 Santa Barbara (SANTA BARBARA) Airport Master Plan - DEIR

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Branch (RCEB) has received the *Draft Environment Import Report (DEIR)* from the State Clearinghouse for the proposed City of Santa Barbara (City) Airport Master Plan project.

According to the DEIR, the project area includes active railroad tracks. RCEB recommends that the City add language to the Airport Master Plan so that any future development adjacent to or near the rail right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes, and continuous vandal resistant fencing or other appropriate barriers to prevent trespassers onto the railroad ROW. PUC-5

If you have any questions in this matter, please contact me at (213) 576-7076, ykc@cpuc.ca.gov.

Sincerely,

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings and Engineering Branch
Safety and Enforcement Division

C: State Clearinghouse

Response to Recirculated Draft Program EIR - Letter 2
State of California Public Utilities Commission (PUC)
Dated July 19, 2016

*PUC-1 through PUC-4 are included in **Appendix A** of this Final Program EIR.*

PUC-5: This is a duplicate comment letter to the letter submitted on August 31, 2015, regarding rail corridor safety.

Response: Refer to **Appendix A** of the Final Program EIR, Letter 1, Responses to Comments PUC-1 through PUC-4, which state that the project area analyzed for the proposed Airport Master Plan does not include the nearby railroad tracks. The only at-grade crossing of the railroad within a mile of the Airport is at Kellogg Road, located approximately 0.7 mile east of S. Fairview Avenue. No project-related vehicular or pedestrian traffic will result in an increase across this at-grade crossing. Since no impacts to railroads will occur as a result of the proposed Airport Master Plan; no mitigation is required.

SBCAG
santa barbara county association of governments
260 North San Antonio Road., Suite B • Santa Barbara, CA • 93110
Phone: 805/961-8900 • Fax: 805/961-8901 • www.sbcag.org

July 21, 2016

RECEIVED
JUL 26 2016
CITY OF SANTA BARBARA
PLANNING DIVISION

Andrew Bermond, AICP
Project Planner
City of Santa Barbara
Planning Division
P.O. Box 1990
Santa Barbara, CA 93102-1990

Re: Comments on the Recirculated Draft Environmental Impact Report for the Santa Barbara Airport Master Plan

Dear Mr. Bermond:

The Santa Barbara County Association of Governments (SBCAG) has reviewed the Recirculated Draft Environmental Impact Report for the draft Santa Barbara Airport Master Plan. As the Airport Land Use Commission for Santa Barbara County, SBCAG is responsible for reviewing the draft Santa Barbara Airport Master Plan for consistency with the adopted Airport Land Use Plan under State law. The City referred the draft Master Plan to SBCAG for a consistency review in early October 2015 and the SBCAG Board found the Airport Master Plan consistent with the Airport Land Use Plan at its meeting on November 15, 2015.

Among its other roles, SBCAG is also designated as the Metropolitan Planning Organization, Regional Transportation Planning Agency and Congestion Management Agency for Santa Barbara County. In these capacities, SBCAG is responsible for development of the Regional Transportation Plan-Sustainable Communities Strategy and the Regional Transportation Improvement Program, as well as administration of Transportation Development Act requirements with respect to public transit in Santa Barbara County. SBCAG is also responsible, in cooperation with local and State agencies, to identify and resolve traffic congestion problems as specified by law.

The Airport Master Plan is a key document that will guide overall development of Santa Barbara Airport for the next 15 to 20 years. It also contains vital planning assumptions for our Airport Land Use Compatibility Plan (ALUCP), which we are currently in the process of updating. SBCAG acknowledges the vital project sponsorship that Airport has provided for the ALUCP update and we look forward to working with you on the project moving forward.

SBCAG-7

SBCAG offers the following comments on the draft EIR:

- **Impact T-3.** The DEIR recognizes that the draft Master Plan would contribute to Class I regional (cumulative) impacts to two intersections (Kellogg Avenue / Hollister Avenue and Fairview Avenue / US 101 NB Ramps). The improvements identified in the DEIR would help to mitigate the Airport Master Plan impacts to LOS B for the intermediate term and long-term scenarios. SBCAG-8

- **Ekwill/Fowler Road Extension Project:** The Recirculated Draft EIR includes the Ekwill Street extension in the intermediate (Year 2022) and long-term (Year 2032) scenarios, but the Fowler Road project was not included in the cumulative analysis. This project would construct a new section of Ekwill Street west of Route 217 that would extend between Fairview Avenue and Kellogg Avenue and also still proposes to extend Fowler Road eastward from its current terminus at Fairview Avenue to Kellogg Avenue, although this Fowler Road extension does not appear to be included in the cumulative analysis. When completed, this regionally significant project would provide an alternative east-west travel route to Hollister Avenue through Old Town Goleta. SBCAG-9

  The California Transportation Commission, acting through its 2016 State Transportation Improvement Program (STIP) recently delayed funding for the Ekwill Road extension project from fiscal year 2016/17 to 2019/20. Funding for the Fowler Road extension was eliminated from the 2016 STIP, but will be reprogrammed in the 2018 STIP, assuming new funding capacity will be available. SBCAG staff anticipates that funding capacity will be available for the project in the next STIP cycle. Therefore, staff requests that the Fowler Road extension project be included and shown in the Long-Term (2032) Cumulative Traffic Analysis in the DEIR.

  As was stated in our October 19, 2015 comment letter, the Ekwill/Fowler Road Extension Project benefits the Airport by providing an alternative route for those accessing the Airport terminal to and from the east via U.S. 101 (south) or Hollister Avenue. The DEIR and supporting traffic study assume the completion of the Ekwill extension as part of the 2022 and 2032 baseline conditions. The DEIR notes that approximately 5% of airport-generated trips (long-term: 323 average daily trips; 18 P.M. peak hour trips) will travel via Ekwill Road to Kellogg Avenue once the extension project is built (see Appendix C, Figure 4-4).

  Without the Ekwill extension in place, these trips would need to traverse Fairview Avenue or Route 217 to access the Terminal area, which would exacerbate the cumulative congestion impacts on Fairview Avenue and the impacted intersections. Therefore, completion of this project, which is a priority for the region, would directly mitigate the Master Plan's contributions to these cumulative impacts by providing an alternative access route to the Airport terminal through Old Town Goleta. SBCAG-10

  Also, without the Ekwill Road extension completed, the greater number of vehicle trips required to travel along Fairview would expose more vehicles and passengers to potential aircraft hazards from Runway 7-25 (since vehicles traveling along Fairview Avenue must cross the Runway Protection Zone perpendicular to the flight path, whereas vehicles on the proposed Ekwill Road extension would travel parallel to the flight path at the edge of the Runway Protection Zone). Therefore, completion of the Ekwill Road extension would also lessen potential aircraft hazards.

We appreciate the opportunity to comment on the Recirculated DEIR. If you have any questions regarding this letter, please feel free to contact me at 961-8910 or via e-mail at pimhof@sbcag.org.

Sincerely,

Peter Imhof
Deputy Executive Director, Planning

cc: File (CP 3-04-20)
Hazel Johns, Airport Director, Santa Barbara Airport

Response to Recirculated Draft Program EIR - Letter 3
Santa Barbara County Association of Governments (SBCAG)
Dated July 21, 2016

*SBCAG-1 through SBCAG-6 are included in **Appendix A** of this Final Program EIR.*

SBCAG-7: This is a duplicate comment from the letter submitted on October 19, 2015, and establishes SBCAG as the Airport Land Use Commission, the Metropolitan Planning Organization, the Regional Transportation Planning Agency, and the Congestion Management Agency for Santa Barbara County. This comment also states that the SBCAG Board found the Airport Master Plan consistent with the Airport Land Use Plan at its meeting on November 15, 2015.

Response: Comment noted.

SBCAG-8: This comment states that the Recirculated Draft Program EIR found that the draft Master Plan would contribute to Class I cumulative impacts to two intersections (Kellogg Avenue/Hollister Avenue and Fairview Avenue/U.S. 101 northbound ramps and that improvements identified in the EIR would help mitigate project impacts to Level of Service B.

Response: Comment noted. The traffic impact information included in the Recirculated Draft Program EIR is based on a revised Traffic Impact Study, which reanalyzed project-specific and cumulative traffic impacts using City of Goleta methodology (i.e., Traffix traffic analysis software) and SBCAG conventions.

SBCAG-9: This comment updates SBCAG's previous comments in their letter submitted on October 19, 2015, regarding the status of a Fowler Road extension, and requests that it be included in the EIR's long-term cumulative traffic analysis.

Response: Comment noted. However, the extension of Fowler Road is not included in the traffic analysis since its proposed location within a runway protection zone makes it a less viable action. In addition, as is stated in this comment, it is not currently programmed in the State Transportation Improvement Program.

SBCAG-10: This comment reaffirms SBCAG's support of an Ekwill Road extension as stated in their letter submitted on October 19, 2015.

Response: Comment noted. The revised Traffic Impact Study in the Recirculated Draft Program EIR includes the future extension of Ekwill Road in the years 2022 and 2032 as a planned roadway improvement.

Our Vision Clean Air

Santa Barbara County
Air Pollution Control District

RECEIVED
AUG 04 2016
CITY OF SANTA BARBARA
PLANNING DIVISION

August 2, 2016

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

Re: APCD Comments on the Recirculated Draft Program Environmental Impact Report on the Proposed Airport Master Plan (MST2013-00453), SCH# 201406096

Dear Mr. Bermond:

The Air Pollution Control District (APCD) has reviewed the Recirculated Draft Program Environmental Impact Report (EIR) for the referenced project. The Santa Barbara Airport Master Plan provides guidance for the Airport's overall development for the next 15-120 years based on Federal Aviation Administration (FAA)-approved forecasts of aviation activity at the Santa Barbara Airport and provides development scenarios for the short term (2017), intermediate term (2022) and long term (2032). These development scenarios are not only reflective of the level of activity forecast to occur at the Airport, but are dependent on federal funding cycles and the availability of grant money for aviation projects. The proposed Airport changes in the Master Plan consist of:

1. Airfield Recommendations: Extension of Taxiway H to the west, parallel to the main instrument runway, restriping of existing paved areas, paving light lanes along taxiway edges, relocating entrances and exits from the taxiway system to comply with Federal Aviation Administration (FAA) recommendations.
2. North Landslide Recommendations: Consolidation of general aviation operations to facilitate two Fixed Base Operator (FBO) lease areas on the northeast portion of the airfield to provide tenant and visiting private aircraft services and facilities, and support facility changes including relocation of the Airport Maintenance Yard.
3. Terminal Area Recommendations: Construction of a new Long Term Parking Lot south of the Airline Terminal to accommodate 1,315 new or relocated parking spaces, expansion of the Airline Terminal, and relocation of the south-side FBO.

The Santa Barbara Airport is located on 948-acres adjacent to the City of Goleta and the University of California, Santa Barbara, and eight miles to the west of the downtown City of Santa Barbara area.

APCD-5

Air Pollution Control District staff offers the following comments on the Recirculated Draft Program EIR:

1. **Section 4.1 AIR QUALITY/GREENHOUSE GAS EMISSIONS, 4.1.4, Project-Specific Impacts, Result AQ-1, page 4-9:** It is stated that *"Airport emissions would be below the APCD threshold of 240 pounds per day of ROC and NOx and 80 pounds per day of PM10 (stationary or mobile sources), and 25 pounds per day (for automobile emissions only), in both the short and long term build out scenarios."* The APCD threshold of 240 pounds per day of ROC and NOx and 80 pounds per day of PM10 considers the combined emissions from both stationary and mobile sources. Please correct the above statement to address this.

APCD-6

Aeron Arlin Genet • Air Pollution Control Officer
260 North San Antonio Road, Suite A • Santa Barbara, CA • 93110 • 805.961.8800
OurAir.org • twitter.com/OurAirSBC

If you have any questions regarding these comments, please feel free to contact me at (805) 961-8893 or via email at NightingaleK@sbcapcd.org.

Sincerely,

Krista Nightingale,
Air Quality Specialist
Technology and Environmental Assessment Division

cc: TEA Chron File

Response to Recirculated Draft Program EIR - Letter 4
Santa Barbara County Air Pollution Control District (APCD)
Dated August 2, 2016

*APCD-1 through APCD-4 are included in **Appendix A** of this Final Program EIR.*

APCD-5: This is a duplicate comment from the letter submitted on October 28, 2015, and summarizes the main changes to Airport facilities as recommended in the proposed Airport Master Plan.

Response: Comment noted.

APCD-6: This comment clarifies that the APCD threshold of 240 pounds per day of ROC and NO_x and 80 pounds per day of PM_{10} considers the combined emissions from both stationary and mobile sources.

Response: Comment noted. This change has been made to the text of the Final Program EIR (Section 4.1.4, Result AQ-1).

Bermond, Andrew

From: Freddie Romero <freddyromero1959@yahoo.com>
Sent: Wednesday, August 03, 2016 11:36 AM
To: Bermond, Andrew
Subject: Draft EIR airport

Mr. Bermond,

Thank you for the notice on this project and our opportunity to comment on the DEIR.

I would to ask, since the city is relying on Federal funds for these projects, will the city be engaging tribes in Sec 106, as directed in NHPA 36 CFR 800.

The concern that the SYBCI Elders Council have with any work taking place at the airport, is the strong possibility of inadvertent discoveries of cultural material and human remains.

Previously when the airport proposed to extend a runway at the airport, over 1000 pieces of human bone were found and were believed to be of indigenous descent.

The bones, as a result of the destruction of the village of Helo, were redeposited when the soils from Helo were used as fill material to create the airport.

So I would ask that you engage not only Santa Ynez Chumash, but all the local Chumash tribes as well and get their comments and recommendations for these proposed projects.

FR-1

Thank you and I look forward to hearing from you.

Freddie Romero
Cultural Resources Coordinator
SYBCI Elders Council
805-688-7997 X4109
805-403-2873

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Response to Recirculated Draft Program EIR - Email 5
Freddie Romero, SYBCI Elders Council (FR)
Dated August 3, 2016

FR-1: This comment asks if the City of Santa Barbara will be engaging in Section 106 consultation under the *National Historic Preservation Act* (NHPA) since there is a possibility of inadvertent discoveries of cultural material and human remains. The comment also asks that all local Chumash tribes be engaged in the process.

Response: Any airport projects relying on Federal funds or requiring a Federal action, such as an update to the Airport Layout Plan, would be subject to the NHPA. However, the Section 106 consultation process will occur between the Federal Aviation Administration, as the Federal lead agency, and any federally-recognized tribes, rather than the City of Santa Barbara.

The City of Santa Barbara, however, will conduct tribal consultation per Assembly Bill (AB) 52 under State law with all tribes that have requested that they be consulted. This mandated AB 52 notification/consultation process will occur as part of the State environmental review process under the *California Environmental Quality Act* on all airport projects.

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213

September 6, 2016

Mr. Andrew Bermond
City of Santa Barbara Planning Division
630 Garden Street
Santa Barbara, California 93101

Re: Draft Airport Master Plan Environmental Impact Report, July 2016 (SCH #2014061096)

Dear Mr. Bermond:

Enclosed with this letter are NOAA's National Marine Fisheries Service's (NMFS) comments on the draft Santa Barbara Airport Master Plan (Airport Master Plan) Environmental Impact Report (DEIR). As explained more fully in the enclosure, NMFS review of the DEIR indicates the effects of the Airport Master Plan on federally endangered steelhead (*Oncorhynchus mykiss*) are not adequately considered. Among other areas of concern, the DEIR appears to rely on outdated and incomplete information regarding how different steelhead life-stages utilize estuarine habitats in general and the frequency of current steelhead use and observations in the Goleta Slough. The potential impacts (including cumulative impacts) of the Airport Master Plan on environmentally sensitive habitats, water quality and the sand berm breaching pattern of Goleta Slough should be considered in any final determination of the significance of the impacts under the California Environmental Quality Act. NMFS-1

Thank you for the opportunity to comments on the Airport Master Plan. If you have a question regarding NMFS' comments on this matter, please contact Mark Capelli at (805) 963-6478 or Rick Bush at (562) 980-3562.

Sincerely,

Anthony P. Spina,
Chief, Southern California Branch
California Coast Area Office

Enclosure

cc: Chris Dellith, U.S. Fish and Wildlife Service
Aaron Allen, U.S. Army Corps of Engineers
Mary Larson, California Department of Fish and Wildlife
Mary Hamilton, Central Coast Regional Water Quality Control Board
Mark Delaplaine, California Coastal Commission
Patricia Saley, Goleta Slough Management Committee
Cameron Benson, City of Santa Barbara
Maureen Spencer, Santa Barbara County Flood Control District
Administrative File: 150308WCR2016CC00317

Enclosure

NOAA's National Marine Fisheries Service (NMFS) Comments on Draft Santa Barbara Airport Draft Environmental Impact Statement

September 6, 2016

Background

The Santa Barbara Airport is located on approximately 948 acres adjacent to the City of Goleta and the University of California, Santa Barbara, with the airport runways and appurtenant facilities situated in the heart of the Goleta Slough. The Goleta Slough itself is comprised of a substantial body of open water, wetland, terrestrial, and tributary habitats that support a wide variety of terrestrial and aquatic species. There are historic and contemporary records of anadromous steelhead (*Oncorhynchus mykiss*) occurring in the Goleta Sough and the upstream tributaries (Becker and Reining 2008, National Marine Fisheries Service 2001, 2005, 2008a, 2008b, 2009a, 2009b, 2013, 2014, 2015).

The southern California steelhead was designated as a federally endangered species in 1997 (62 FR 43937), with its listing and status reconfirmed in 2006 (71 FR 5248). The Goleta Slough and its major tributaries (Tecolotito, San Pedro, San Jose, Maria Ygnacio, San Antonio, and Atascadero creeks) were designated as critical habitat in 2005 (70 FR 52488). Critical habitats are those specific geographic areas that contain physical or biological features essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include areas that are not currently occupied by the species, but that will be needed for its recovery.

The Goleta Slough watershed is part of the Conception Coast Biogeographic Populations Group (BPG) of the endangered Southern California Steelhead Distinct Population Segment (DPS) identified by NMFS's South-Central/Southern California Steelhead Recovery Team; as such, the slough contributes significantly to the ecological diversity of the Southern California Steelhead Recovery Planning Area and plays an important role in the long-term viability of the Southern California Steelhead DPS (NMFS 2007).

The Goleta Slough watershed is designated as a Core-1 Population in NMFS' Southern California Steelhead Recovery Plan (NMFS 2012, Table 10.3) and supports a remnant population of the federally endangered southern California steelhead. Designation of Core Populations in the Southern California Steelhead Recovery Plan is based on a number of factors, including the intrinsic potential of the watershed to support a viable population of steelhead, the role of the population in the overall recovery strategy, and the severity of the threats within the watershed to the steelhead population (NMFS 2012, Appendix B, "Intrinsic Potential Ranking", p. B-1 and Table 10.2, "Threat source rankings in component watersheds within the Conception Coast BPG region", p. 10-10). Restoration and protection of all core populations is necessary to fully meet the recovery goals, including de-listing, of the Southern California Steelhead DPS. These are set forth in NMFS' Southern California Steelhead Recovery Plan (NMFS 2012, Chapter 6, Steelhead Recovery Goals, Objectives & Criteria, pp. 6-1 through 6-13, and Chapter 7, Steelhead Recovery Strategy, pp. 7-1 through 7-19).

NMFS-2

Project Elements that are the Basis of these Comments

The draft Santa Barbara Airport Master Plan provides guidance for the Santa Barbara Airport's overall development for the next 15-20 years and identifies the following set of general elements:

- Airfield Recommendations: Extension of Taxiway H to the west, parallel to the main instrument runway, restriping of existing paved areas, paving light lanes along taxiway edges, and relocating entrances and exits from the taxiway system to comply with Federal Aviation Administration (FAA) recommendations.
- North Landside Recommendations: Consolidation of general aviation operations to facilitate two Fixed Base Operator (FBO) lease areas on the northeast portion of the airfield to provide tenant and visiting private aircraft services and facilities, and support facility changes including the relocation of the Airport Maintenance Yard.
- Terminal Area Recommendations: Construction of a new Long Term Parking Lot south of the Airline Terminal to accommodate 1,315 new or relocated parking spaces, expansion of the Airline Terminal, and relocation of the south-side FBO.

The Airport Master Plan Environmental Impact Report (DEIR) does not specify which projects are to be implemented as part of the Airport Master Plan. Instead, the DEIR indicates that no actual development projects are proposed at this time, and that the phasing of recommended improvements would be adjusted to meet actual demand at the Santa Barbara Airport. As a result, the analysis of potential impacts for individual Airport Master Plan elements is deferred to the actual project design phase.

NMFS-3

Potential Project Impacts to Endangered Steelhead and Designated Critical Habitat

Juvenile steelhead commonly occur in California coastal estuaries like the Goleta Slough and can be adversely affected by habitat impacts such as physical developments intruding into aquatic environments, degradation of water quality through non-point discharges, or artificially induced breaching of the seasonal sandbar that controls water levels (and water quality parameters such as salinity) in the estuary.

Because of the Airports' close proximity to Goleta Slough, implementing elements of the Airport Master Plan has the potential to adversely impact designated steelhead critical habitats through encroachment into riparian or aquatic habitats, and impact steelhead through modification of the runoff and sandbar breaching patterns of the Goleta Slough.

NMFS-4

NMFS' Southern California Steelhead Recovery Plan identifies a number of systemic threats to steelhead utilizing the Goleta Slough and its tributaries, including: 1) urban development, such as roads and other paved areas, which can impact runoff patterns and non-point pollution discharges to the aquatic habitats utilized by steelhead; 2) culverts and road crossings that impede fish migration; 3) groundwater extractions which can reduce base flows and decrease water availability to riparian vegetation; 4) flood-control activities (including artificial breaching of the Goleta Slough mouth), which can alter natural-channel morphology, increase sedimentation, and disrupt both aquatic and riparian vegetation; and, 5) agricultural developments, which can increase sedimentation, alter natural runoff and streamflow patterns as well as introduce non-

NMFS-5

point sources of pollutants such as fertilizers and pesticides (NMFS 2012, Table 10-2, "Threat source rankings in component watersheds in the Conception Coast BPG region", p. 10-10).

NMFS-5 (cont'd)

Based on the results of the Airport Master Plan's sea-level rise study and the annual need to manage water surfaces elevations to prevent airport flooding, the DEIR should acknowledge the potential adverse impacts on environmentally sensitive habitats (including designated critical habitat for steelhead) as a result of artificially breaching the sand berm at the mouth of the Goleta Slough to protect existing and potential future airport facilities and infrastructure (ESA 2015b; see also, California Energy Commission 2012, Denka et al. 2015, and ESA 2015a). Appropriate mitigation measures such as raising flood-prone structure or building flood walls around low lying areas to avoid the need for breaching the Goleta Slough mouth should be identified in the Final EIR and included in any final permits for specific components of the Airport Master Plan.

NMFS-6

The effects of the projected development within the Goleta Slough area on runoff and waste discharges to the estuary (and lower reaches of the various tributaries) should be recognized in the Final EIR and appropriate mitigation measures such as oil and grease collection systems and related maintenance procedures should be included in any final permits for specific components of the Airport Master Plan.

NMFS-7

The Southern California Steelhead Recovery Plan identifies a number of recovery actions intended to address impacts from urban development within the watershed. These include the following (Table 10-9, "Southern California Steelhead DPS Recovery Action Table for the Goleta Slough Watershed (Conception Coast BPG)", pp. 10-32 and 10-35):

> GS-SCS-11.1. Develop and implement a plan to manage roadways adjacent to riparian/floodplain corridors to reduce sedimentation, or other non-point pollution sources, before it enters natural watercourses to protect all steelhead life history stages, including adult and juvenile migration spawning, incubation and rearing habitats.
>
> GS-SCS-11.2. Develop and implement plan to retrofit storm drains to filter runoff from roadways to remove sediments and other non-point pollutants before it enters natural watercourses to project all *O. mykiss* life history stages, including adult and juvenile migration spawning, incubation and rearing habitats.
>
> GS-SCS-13.1. Develop and implement land-use planning policies and development standards that restrict further development in the flood plain/riparian corridor to protect all *O. mykiss* life history stages, including adult and juvenile migration, spawning, and incubation and rearing habitats.
>
> GS-SCS-13.2. Develop and implement plan to retrofit storm drains in urban areas to control sediment and other non-point pollutants in runoff from impervious services before it enters natural watercourses to protect all *O. mykiss* life history stages, including adult and juvenile migration spawning, incubation and rearing habitats.
>
> GS-SCS-14.2. Review California Regional Water Quality Control Boards Regional Plans, and Stormwater Permits, and modify to include specific provisions for the protection of all *O. mykiss* life history stages, including adult and juvenile migration spawning, incubation and rearing habitats.

NMFS-8

The existing and projected areas of impermeable surface can affect the Goleta Slough's sandbar breaching pattern that is critical in controlling aquatic habitat conditions within the estuary (ESA 2015a, Jacobs et al. 2011, Bond 2006, Bond et al. 2008, and Adam et al. 2001).

NMFS-9

The Southern California Steelhead Recovery Plan identifies a number of recovery actions intended to address the management of the Goleta Slough estuary. These include the following (Table 10-9, "Southern California Steelhead DPS Recovery Action Table for the Goleta Slough Watershed (Conception Coast BPG)", p. 10-34):

> GS-SCS-12.1. Develop and implement restoration and management plan for the estuary. To the maximum extent feasible, the plan should include restoring the physical configuration, size and diversity of the wetland habitats, eliminating exotic species, controlling artificial breaching of the sand bar, and establishing an effective buffer to restore estuarine functions and promote *O. mykiss* use (including rearing and acclimation) of the estuary.
>
> GS-SCS-12.2. Review applicable County and/or City Local Coastal Plans and modify to provide specific provisions for the protection of all *O. mykiss* life history stages, including adult and juvenile migration, spawning, incubation and rearing habitats.

NMFS-10

Finally, the Southern California Steelhead Recovery Plan identifies a "Critical Recovery Action" for all Core 1 Populations in each BPG. The Critical Recovery Action for the "Goleta Slough Complex", which includes is tributary creeks, stipulates (Table 10-3, "Critical recovery actions for Core 1 populations within the Conception Coast BPG", p. 10-13):

> "Modify road and railroad crossings and remove or modify flood-control channels and grade control structures to allow natural migration of steelhead to upstream spawning and rearing habitats and passage of smolts and kelts downstream to the estuary and the ocean. Identify, protect, and where necessary restore estuarine and freshwater rearing habitats. Develop restoration and management for the Goleta Slough Estuary to restore estuarine functions."

The assessment of the identified projects impacts on biological resources, including aquatic resources such as steelhead, in the Airport Master Plan are based on incomplete and in some cases inaccurate information. For example, the level, type, and timing of steelhead use of the Goleta Slough is not based on actual monitoring using recognized surveying protocols, but rather citations to other documents which themselves are not based on actual field investigations. As a result, the Class II and Class III impacts are not adequately supported.

NMFS-11

Because the DEIR relies on surveys conducted during an extended drought, the resulting information is not representative of the full range of habitat conditions and habitat uses made by various species, including listed or endangered species such as steelhead. The information derived during drought conditions are useful in documenting extreme conditions, but are woefully inadequate, if not misleading, for characterizing baseline conditions for biological resources.

NMFS-12

The DEIR included only cursory remarks about the steelhead use of the Goleta Slough, though it is one of the largest estuaries in the southern California steelhead DPS and serves as both an entrance and exit to the several steelhead spawning and rearing tributaries of the Goleta Slough watershed. The final EIR should refer to the specific contemporary observations of steelhead (both adults and juveniles) that have been made by NMFS and California Department of Fish and Wildlife personnel since the species was listed as federally endangered in 1997 (Becker and Reining 2008, National Marine Fisheries Service 2001, 2005, 2008a, 2008b, 2009a, 2009b, 2013, 2014, 2015).

NMFS-13

While the DEIR indicates that the Goleta Slough mouth is outside of the study area, the DEIR includes artificial breaching of the slough mouth as a management strategy and discusses the related implications for a variety of species which are affected by such operations, including individual species of plants, birds, and fish (e.g., pp. 4-32 through 4-33, B-9 through B-24, B-59, B-115). Management of the Goleta Slough mouth also has implications for the vulnerability of the proposed and existing Santa Barbara Airport facilities stemming from sea-level rise, and the seasonal increase in estuarine water levels resulting from the seasonal closure of the Goleta Slough mouth. Because of these interrelated issues the Goleta Slough mouth should be included in the study area.

NMFS-14

The DEIR contains only general statements regarding impacts to special status species such as steelhead, and related mitigation measures; it does not address the specific potential impacts (e.g. intrusion into Tecolotito Creek, increased urban runoff, and artificial breaching of the Goleta Slough mouth to regulate water levels within the Goleta Slough to protect airport facilities and infrastructure from seasonal flooding). These issues should be addressed more fully and potential mitigation measures identified in the final EIR.

Finally, the DEIR appears to assume that if individual project impacts to the Goleta Slough are adequately mitigated, "cumulative impacts would be as well". This logic ignores the potential synergistic effects of individual projects, and has the effect of avoiding a meaningful cumulative impacts analysis. For example, the cumulative impacts of increased impermeable surfaces associated with certain proposed project elements and projected sea-level rise or artificial breach of the Goleta Slough mouth, on water quality in the Goleta Slough cannot be treated separately to produce reliable findings.

NMFS-15

Specific Comments on the Draft Environmental Impact Report

Special-Status Species

P. 4-22

The DEIR indicates that steelhead "may occasionally pass through Goleta Slough in transit to upstream spawning areas." This characterization of the steelhead use of Goleta Slough is inaccurate in several respects and the final EIR should be corrected in this regard. First, it should be noted that the Goleta Slough is the sole point of entrance, and exit for steelhead using the tributaries to the Goleta Slough watershed. The frequency that adult or juvenile steelhead pass through the Goleta Slough has not been monitored, but based on contemporary observation of adults in the tributaries of San Pedro, Atascadero, and Maria Ygnacio creeks, and the persistent presence of juveniles *O. mykiss* rearing in the major spawning and rearing tributaries in the Goleta Slough watershed, steelhead likely transit the Goleta Slough annually. However, the exact numbers (of both adults and juveniles) cannot be known without annual monitoring using accepted protocols (see NMFS 2016, pp. 22-26). Second, Goleta Slough is not used solely for transit between the ocean and the upstream spawning and rearing tributaries. Adults may also use the estuary as over-summering refugia (most frequently as spawned out kelts), and juveniles may also use the estuary for rearing. This last function of the estuary is of particular importance because the availability of abundant food sources for juveniles can support accelerated growth, and subsequent increased ocean survival of steelhead smolts; juvenile use of estuaries typically increases when the sand berm closes the estuary mouth and mildly brackish or freshwater

NMFS-16

conditions develop within the estuary (Bond 2006, Bond et al. 2008, Kelley 2008, Atkinson 2010, Hayes, et al. 2011).

P. 4-22

The DEIR indicates that:

> "Adult steelhead occurrence in the Goleta Slough is limited to periods when the estuary is open and water depths in the river allow adults to use it as a migration corridor to the upper watershed."

This characterization of steelhead use of Goleta Slough is also inaccurate. As noted above, adults may also use the estuary as over-summering refugia (most frequently as spawned out kelts); this use of the Goleta Slough is not limited to periods when the estuary is open, but may occur after the estuary mouth is closed and adults emigrating as kelts are unable to exit the watershed to the ocean (NMFS 2013, 2008a).

NMFS-16 (cont'd)

Open Water

P. 4-25

The DEIR indicates that:

> "Although this species [steelhead] is not known to occur in Carneros Creek, suitable spawning habitat is present upstream, and steelhead would have to travel through the lower reaches of the stream, within the biological study area."

As noted above, there is no regular monitoring of steelhead within the Goleta Slough watershed (NMFS 2016, see p. 34). Without adequate monitoring it is not possible to quantitatively characterize the steelhead use of the various spawning and rearing tributaries to the Goleta Slough.

NMFS-17

City Coastal Plan: Airport and Goleta Slough. LCP Policies Regarding Biological Resources, Santa Barbara Airport

P. 4-30

Policy C-16. Indicates that:

> "Construction activities related to Tecolotito Creek realignment shall minimize extensive stream diversions and shall minimize potential impacts to steelhead. Construction of the new creek channel shall be completed prior to connecting with the exiting channel and final diversion of stream flow into the new creek channel shall be conducted only between July 15 and October 1 of any given year to avoid the migration period of steelhead."

As noted above, Tecolotito Creek is one of the tributaries to the Goleta Slough that is included in the critical habitat designations for the endangered Southern California Steelhead DPS. Steelhead may be present in Tecolotito Creek outside the indicated migration window, either as kelts or as rearing juveniles.

NMFS-18

Project-Specific Impacts

Impacts to Adjacent Creeks

P. 4-37

Impact BIO-3

The DEIR indicates that:

> "The Taxiway H Airfield Safety Project is in proximity to Carneros Creek." and "It [steelhead] is not known to occur in Tecolotito or Carneros Creeks, but suitable spawning habitat is present upstream."

See above comments (P. 4-25) regarding Carneros Creek, and Policy C-16 regarding Tecolotito Creek.

NMFS-19

Wildlife Hazard Assessment at the Santa Barbara Airport

B-9, P. 3

The potential impacts of artificial breaching the mouth of Goleta Slough are integral to the environmental assessment of the DEIR for the Airport Master Plan. Therefore, the Final EIR should incorporate the results from the study of the breaching impacts on the endangered Southern California Steelhead DPS previously identified by NMFS.

B-10, P. 4

The DEIR indicates that:

> " Twice subsequently [to 2013] emergency permits have been obtained to breach the slough mouth when rising waters threatened to flood SBA [Santa Barbara Airport] and surrounding areas. SBA initiated a project to study effects of water levels on steelhead and the tidewater goby (*Eucyclobius newberryi*), . . . as well as on bird-strike hazards. Until a final plan for managing the sough mouth is devised, the nature of the bird strike hazard going forward at SBA cannot be precisely known."

As noted above, the Final EIR should incorporate the results from the study of the breaching impacts on the endangered Southern California Steelhead DPS.

NMFS-20

2.3.1 Open Water

B-17, P. 11

The DEIR notes that:

> "SBFFCD's [Santa Barbara County Flood Control District] permits to maintain the slough mouth expired in late 2012, and the National Marine Fisheries Service (NMFS) indicated that mechanical breaching of the slough could not continue under any new permits without an assessment of potential impacts to southern steelhead, federally listed as endangered."

The impacts of breaching Goleta Slough are integral to the environmental assessment of the DEIR for the Airport Master Plan, and the Final EIR should incorporate the results of the study of the impacts of breaching the slough mouth on the endangered Southern California Steelhead DPS.

2.4.2.2 Goleta Slough Mouth Management

B-22, P. 16

See comments above under Wildlife Hazard Assessment at the Santa Barbara Airport (B-9, B-10) and Open Water (B-17).

2.4.2.3 Goleta Slough Management Committee Sea-Level Rise Study and Existing Conditions

B-24, Pp. 17-18.

See comments above regarding B-10.

NMFS-20 (cont'd)

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Steelhead Recovery Coordinator. National Marine Fisheries Service, Southwest Region, Santa Barbara California.

Response to Recirculated Draft Program EIR - Letter 6
U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS)
Dated September 6, 2016

NMFS-1: This comment summarizes the points raised in the body of the letter.

Response: Comment noted. Refer to the responses to the remainder of the comments contained in this letter.

NMFS-2: This comment provides background information on the Goleta Slough, its relationship to the federally-endangered southern California steelhead, and the Slough and its tributaries as designated critical steelhead habitat. It also provides background information on the Goleta Slough watershed as a designated Core-1 Population in the *Southern California Steelhead Recovery Plan* (NMFS 2012).

Response: Comment noted.

NMFS-3: This comment summarizes the main elements of the proposed Airport Master Plan and correctly states that "no actual development projects are proposed at this time."

Response: Comment noted.

NMFS-4: This comment summarizes the main premise of the letter - that potential impacts to critical steelhead habitat could occur as a result of implementation of the proposed Airport Master Plan due to the Airport's close proximity to the Goleta Slough. Specific points of this premise are contained in the remainder of the letter.

Response: Comment noted. Specific responses to individual points are provided in later responses.

NMFS-5: This comment lists systematic threats to steelhead using the Goleta Slough and its tributaries as identified in the *Southern California Steelhead Recovery Plan* (NMFS 2012).

Response: Comment noted.

NMFS-6: This comment states that based on a sea-level rise study and annual need to manage water surface elevations to prevent airport flooding effects, the EIR should identify impacts to designated critical steelhead habitat as a result of artificially breaching the sand berm at the mouth of the Goleta Slough. This comment concludes that the Airport Master Plan Program EIR should identify mitigation measures to address this existing situation.

Response: The sea-level rise study on Goleta Slough was part of the Goleta Slough Management Committee's (GSMC) recently completed *Goleta Slough Area Sea Level Rise and Management Plan* (Slough Management Plan) (GSMC 2015) and was used as a source information for discussion purposes in the Final Program EIR for the Master Plan. The Final Program EIR identifies the use of Slough channels by southern California steelhead, and that no direct impacts to these channels or their tributaries will occur as a result of Master Plan implementation. In addition, the proposed Master Plan will have little effect on the current flood management practices at the Airport, including the artificial breaching of the Goleta Slough mouth sand berm.

NMFS-7: This comment states that the Program EIR should recognize the potential for runoff and waste discharges to the Goleta Slough from future Master Plan projects and identify appropriate mitigation measures to be included in any final permits for future projects.

Response: Section 4.2.4 of the Final Program EIR (Impact BIO-3) addresses potential indirect impacts to creeks in proximity to development areas identified in the Master Plan and describes the creeks as potential habitat for tidewater gobies and southern California steelhead. This section of the Program EIR also identifies the existing water quality management plans approved by the Central Coast Regional Water Quality Control Board (RWQCB) that are in place at the Airport to protect water quality. (See also Section 4.5.2 of the Final Program EIR, where more detailed discussion of the policies and plans in place to protect water quality in the Slough is provided.)

Based on existing regulatory oversight of Airport runoff discharges, the Final Program EIR concludes that indirect impacts to protected species within Carneros Creek, which will be the closest aquatic resource to future Master Plan projects (approximately 250 feet), are less than significant (Result BIO-3). All future Master Plan projects will be required by the RWQCB and City permits to implement all applicable water quality permit conditions.

NMFS-8: This comment lists a number of recovery actions contained in the *Southern California Steelhead Recovery Plan* (NMFS 2012) intended to address impacts from urban development within the watershed. Included are actions to develop and implement plans to manage pollution from roadways, retrofit storm drains, restrict further development in the flood plain/riparian corridor, and modify provisions within RWQCB permits and regional plans.

Response: The actions promoted in the *Southern California Steelhead Recovery Plan* (Recovery Plan) (NMFS 2012) are beyond the scope of the proposed Airport Master Plan, which is an

updated facilities plan required by the Federal Aviation Administration (FAA) to help direct a capital improvement program at an airport that meets Federal grant assurances. It does not direct RWQCB actions or airport-wide storm drain maintenance or improvements. The proposed Master Plan also does not involve roadways or development within riparian corridors. The Master Plan does limit development within sensitive habitats and provides for drainage and water quality protection consistent with objectives of the Recovery Plan.

NMFS-9: This comment states that existing and projected airport impermeable surfaces can affect the Goleta Slough's sandbar breaching pattern.

Response: Section 4.5.4 (Impact and Result HYD-1) of the Final Program EIR discusses future increases in impermeable surfaces due to Master Plan implementation. Based on existing regulations, on-site capture, retention, and treatment of storm water must be incorporated into the design of development projects.

NMFS-10: This comment lists a number of recovery actions contained in the *Southern California Steelhead Recovery Plan* (NMFS 2012) intended to address the management of the Goleta Slough estuary.

Response: As previously stated in response to comment NMFS-8, the actions promoted in the *Southern California Steelhead Recovery Plan* (NMFS 2012) are beyond the scope of the proposed Airport Master Plan. In addition, the City is only one of many stakeholders who participate in the management of the Slough. In addition to the advisory role of the GSMC, the United States Fish and Wildlife Service, the California Coastal Commission, the California Department of Fish and Wildlife, and the Central Coast RWQCB all have potential regulatory authority over resources within the Slough. FAA has Federal oversight over management of the Airport and its safety. The County of Santa Barbara and the University of California, Santa Barbara, as adjacent land owners also have a vested interest in the Slough management.

NMFS-11: This comment states that the Program EIR does not contain information based on actual monitoring of aquatic resources using recognized survey protocols, but rather bases its information on other published documents.

Response: Comment noted. The source of information for discussion of the potential presence of southern California steelhead within the Slough is the *Goleta Slough Area Sea Level Rise and Management Plan* (GSMC 2015). Since no physical impacts to Goleta Slough channels and tributary creeks will occur as a result of Master Plan implementation, no steelhead surveys were conducted. The potential for steelhead within these areas was presumed and indirect impacts addressed accordingly.

NMFS-12: This comment states that the information within the Program EIR is not representative of the full range of habitat conditions and habitat uses because its biological surveys were conducted during an extended drought.

Response: Wetland and sensitive-species surveys of the Goleta Slough used in this Program EIR were conducted in 2012 as part of the Master Plan resources inventory, and occurred before the most recent drought was in full effect. The Notice of Preparation for this Program EIR was issued in 2014. However, because this was a year of drought conditions, earlier surveys prior to the drought were used.

NMFS-13: This comment states that the Program EIR contains only "cursory remarks" about the steelhead usage of the Goleta Slough.

Response: Comment noted. See Responses to Comments NMFS-6 and NMFS-11.

NMFS-14: This comment states that the Program EIR includes artificial breaching of the Slough mouth as a management strategy and refers to pages 4-32 through 4-33 and Appendix B of the Recirculated Draft Program EIR.

Response: This comment refers to a discussion of the Airport's draft *Wildlife Hazard Management Plan* (WHMP) (2008) on pages 4-32 and 4-23 of the Recirculated Draft Program EIR and a *Wildlife Hazard Assessment* (WHA) prepared in 2016, which was appended to the Recirculated Draft Program EIR as a reference document (see also response to comment NMFS-20). The Final Program EIR has been revised to discuss the final WHMP approved by FAA in 2017. Discussion of the WHMP within the Program EIR is within the context of Applicable Plans and Policies (Section 4.2.2) related to biological resources.

NMFS-15: This comment states that the Program EIR's discussion of steelhead is too general and does not address cumulative impacts adequately.

Response: Refer to Responses to Comments NMFS-6 and 7. Since no direct impacts to steelhead habitat will occur as a result of Master Plan implementation, and potential indirect impacts, including cumulative impacts, related to water quality degradation are addressed and monitored through existing approved storm water quality management plans, storm water pollution prevention plans, and water quality permits, these potential impacts are considered less than significant.

NMFS-16: This comment provides information to enhance and correct the information provided in the Recirculated Draft Program EIR (Section 4.2.1, page 4-22) regarding the use of the Goleta Slough and its tributaries by southern California steelhead.

Response: Comment noted. The Final Program EIR has been revised to incorporate the additional information.

NMFS-17: This comment states that without regular, adequate monitoring, it is not possible to quantitatively characterize the steelhead use of the various spawning and rearing tributaries to the Slough.

Response: Comment noted.

NMFS-18: This comment states that Tecolotito Creek is one of the tributaries to the Slough that is included in the critical habitat designations for the southern California steelhead distinct population segment (DPS) and that steelhead may be present in the creek outside the indicated migration window, either as kelts or as rearing juveniles.

Response: Comment noted.

NMFS-19: This comment refers to text in the Recirculated Draft Program EIR (Impact BIO-3), which states that steelhead is "not known to occur within Tecolotito or Carneros Creeks, but suitable spawning habitat is present upstream" in light of previous comments NMFS-17 and NMFS-18.

Response: Comment noted. The text within the Final Program EIR has been revised to indicate that regular monitoring of these creeks for steelhead has not occurred. The conclusion of Impact BIO-3, as stated in Result BIO-3, which is that "there is no construction activity planned in close proximity to creeks located on or near the Airport as a result of the Master Plan" remains accurate and does not need revision. Discussion of indirect impacts from storm water run-off is also unchanged. However, Tecolotito Creek has been added to the list of creeks related to the discussion.

NMFS-20: These comments are on the text of the *Wildlife Hazard Assessment* (Dudek et al. 2016), which was appended to the Recirculated Draft EIR as a source document containing recent wildlife surveys and data for the Airport.

Response: The Airport's *Wildlife Hazard Assessment* is not a part of the Airport Master Plan. It was appended to the Recirculated Draft EIR to incorporate recent biological information that became available after the release of the Draft Program EIR.

See also Responses to Comments NMFS-6, -9, and -14 regarding artificial breaching of the Goleta Slough mouth. No further response is necessary.

Santa Barbara Audubon Society
A Chapter of the National Audubon Society

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September 8, 2016

City of Santa Barbara Planning Division
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ABermond@SantaBarbaraCA.gov

RE: Comments on Recirculated Draft Airport Master Plan Environmental Impact Report

The Santa Barbara Audubon Society (SBAS) is a chapter of the National Audubon Society with over 1100 members in the Santa Barbara area. The mission of the SBAS is to help conserve and restore the earth's natural ecosystems and improve its biological diversity, principally in the Santa Barbara area, and to connect people to birds and nature through education, science-based projects and advocacy.

SBAS has long been involved in the Goleta Slough ecosystem, providing representatives to the Goleta Slough Management Committee, spearheading and participating in restoration projects within the Slough, and leading outreach activities in the Slough ecosystem. Many of our members frequently use Goleta Slough (GS) for their recreational activities. We appreciate the opportunity to offer comments on the Recirculated Draft Airport Master Plan (AMP) Environmental Impact Report (RDEIR). AUD-33

General comments:

SBAS filed a letter containing comments on the initial AMP DEIR on October 30, 2015. SBAS was disappointed that the RDEIR did not address many of its original concerns, including the inadequacy of analysis of the environmental impacts of the proposed AMP update. Because SBAS's initial concerns will be addressed in the Final AMP EIR, SBAS concentrates here on additional concerns about the AMP and RDEIR. AUD-34

Of particular concern are the inadequacy of analysis on AMP impacts on important upland habitats and their wildlife, problems with inconsistencies and inadequacies in the mapping of Slough vegetation types, the uncertain feasibility and effectiveness of proposed mitigation measures, violations of Title 14 provisions for state Ecological Reserves, inconsistencies with provisions of the Santa Barbara General Plan/Local Coastal Plan and California Coastal Act, and inadequacies in the analysis of AMP alternatives. RDEIR-identified Class II impacts for BIO 1, 2, and 4 are not justified by the data or analyses and should be categorized as Class I, as outlined below. AUD-35

Further, the AMP is based on outdated and inaccurate FAA projections and there are no analyses of the safety and efficiency impacts of AMP components. Because the Airport lies entirely within a 100-year floodplain and parts of the Airport lie along floodways, and in light of projected sea level rise, the City of Santa Barbara needs to decide if it wants to devote more taxpayer money and airport revenues for plan provisions that are not needed, have significant impacts on the Goleta Slough ecosystem, and will constitute significant drains on AUD-36

public resources in the future.

Impacts of the proposed Taxiway H extension on the Goleta Slough ecosystem

Inadequacies in assessments of AMP impacts on upland habitats and species.

Because over 90% of coastal California wetlands have been lost, there are numerous local, state, and federal provisions for protecting the fragile remaining wetlands and the native species they support. Although it has been greatly reduced and modified by Santa Barbara Airport's development and management, Goleta Slough remains the largest estuary on the South Coast, supports some of the most extensive coastal wetlands in southern California, and provides many ecosystem services and a home for a diversity of sensitive habitats and species. In recognition of these considerations, City Airport/Slough LCP Conservation Element policies state that "Goleta Slough shall be preserved and restored as a coastal wetland ecosystem" and that the "habitats of rare and endangered species shall be preserved".

A healthy estuarine ecosystem requires a diversity of habitats, including uplands, channels, mud flats, and temporary and permanent wetlands supporting a high diversity of vegetation types and associated wildlife that use these habitats for breeding, nesting, resting, foraging, and migration. In the context of the proposed Taxiway H, the impacts on upland habitat will be severe, contradicting Santa Barbara General Plan (GP)/Local Coastal Plan (LCP) provisions for protecting a diversity of habitats (ER 12) and the RDEIR's statement that transitional and upland habitats are important in sustaining Slough functioning and species diversity (p. 4-38). AUD-37

In general, then, the RDEIR's analysis of the proposed Taxiway H impact on upland habitats and species is inadequate. Upland habitats are important because they support sensitive species and constitute refuges during floods and sea level rise. Further, it is particularly important that upland habitat occurs close to wetlands to fulfill these functions, but the amount of upland habitat is dwindling because areas adjacent to the Slough have been, and continue to be, developed. As a consequence, SBAS emphasizes the importance of maintaining upland habitats within the Slough's area.

Further, the RDEIR fails to adequately address the impacts of the proposed Taxiway H on upland species and their habitats, despite our comments about these species in SBAS's response to the initial DEIR. In our original comments, we recommended that the DEIR do a detailed analysis of the impacts of the AMP on a list of bird species, but this analysis was not done in the RDEIR. AMP impacts on upland species, such as Horned Larks (declining species, locally rare) and Burrowing Owls (State Species of Special Concern) could be severe and some of these species, such as Horned Larks, commonly occur in the Slough (e.g., see RDEIR Appendix B). AUD-38

In addition, the proposed Taxiway H area constitutes important raptor foraging and migration habitat, including habitat for Fully Protected Species (White-tailed Kites, Peregrine Falcons (see Appendix B)) and Species of Special Concern (Northern Harrier). The RDEIR acknowledges that raptors have nested in the willows lining Los Carneros Creek. Research on the White-tailed Kite shows that nesting birds require open foraging habitat in close proximity to nesting sites (usually within 0.25 mile, up to 0.5 mile) emphasizing the importance of the Taxiway H area as foraging habitat for both nesting and migrating raptors. Further, because large areas of open space have been lost to rapid development in the Goleta area, raptor foraging and migration habitat has become limited, emphasizing the importance of remaining upland, open space areas, such as the Taxiway H area, for raptors. Given the importance of upland habitats to the functioning of a healthy estuarine ecosystem and the cumulative loss of raptor foraging habitat in the Goleta area, the BIO 1 and 2 impacts should be Class I, not Class II. AUD-39

Although the RDEIR states that the BIO 2 impacts are reduced by the Airport's Wildlife Hazards Management Program (WHMP), the WHMP, itself, is in violation of numerous local, state, and federal provisions for the AUD-40

protection of wildlife species and is more extensive than warranted by the wildlife risks incurred (see below). Although an Airport WHMP is required by the FAA, the proposed specific provisions of the WHMP are at the discretion of the Airport, subject to the approval of the FAA. SBAS contends that aspects of the WHMP are not warranted, that WHMP development and implementation should be guided by wildlife biologists from regulatory agencies (e.g., CDFW, US FWS), and that current practices damage natural resources and sensitive species that local, state, and federal agencies are pledged to protect. The persistent sightings of raptors in Goleta Slough, including the Taxiway H area, shows that this is important raptor habitat, despite the damages caused by the WHMP. The Airport and Goleta Slough LCP states that the White-tailed Kite is the most frequently observed raptor species in Goleta Slough (p. 3-14).

AUD-40 (cont'd)

Inadequacies in the map depicting vegetation types in Goleta Slough.

The RDEIR minimizes the value of the Taxiway H area by stating that it is covered by fill or brome grassland. Above, we argue that upland grassland habitat is important for some sensitive species and should be protected as an integral part of the Goleta Slough ecosystem. In addition, it is not at all clear that the vegetation types in the Taxiway H area are accurately mapped. The RDEIR, itself, recognizes the shortcomings of its mapping of vegetation types in Goleta Slough, because surveys were only conducted in two months of a drought year, because standard methods were not used, and because the consultant did not have access to some Slough areas. In addition, the map of vegetation types in the RDEIR does not agree with all previous vegetation maps that have been produced, including the vegetation map included in the 2015 Goleta Slough Area Sea Level Rise and Management Plan (GSASLR & MP, Fig. 3-1, also see the 1988 MOU between the California Department of Fish and Game (now Wildlife), the 1997 Airport Safety Area Grading Project Initial Report, and the City of Santa Barbara Coastal Plan, Airport and Goleta Slough (LCP)). These maps show wetlands in the eastern part of the Taxiway H area (such as salt grass and salt flats) and, in some cases, a sagebrush series in the west. Although changes in vegetation mapping may have accrued from the relocation of Tecolotito and Carneros Creeks, the aforementioned map in the 2015 GSASLR & MP shows the realigned Tecolotito and Carneros Creeks, as well as wetlands in the proposed Taxiway H area. SBAS recognizes that the distribution of vegetation types in the Slough will vary with climatic and inundation conditions, particularly in a system where a few centimeters difference in elevation can have a large effect on vegetation formations. The RDEIR, itself, indicates that jurisdictional wetlands could well be present in the Taxiway H area.

AUD-41

Because the RDEIR did not consider inter-annual and seasonal variation in vegetation distributions, did not attempt to synthesize the results of previous mapping exercises, and based its maps on a very limited survey, the RDEIR's analysis of vegetation distributions is inadequate. These analyses of vegetation maps, however, are very important, even at a programmatic, conceptual level, because they allow the impacts of the AMP and congruency with LCP policies (C-4, C-8, C-9, C-11) to be evaluated and the general adequacy of mitigation measures to be assessed, particularly because mitigation ratios depend critically on vegetation types (LCP C-11).

Inconsistencies with management and land use restrictions associated with the Goleta Slough Ecological Reserve, with the City of Santa Barbara's General Plan and Local Coastal Plan, the California Coastal Act, and the Goleta Slough Environmental Management Plan.

The RDEIR recognizes that the proposed Taxiway H and adjacent safety areas would violate numerous provisions of the Santa Barbara GP/LCP (e.g., Policy 1.2, C-4, 8, 9, 11, 15) and California Coastal Act (CCA 30001.5a, 30240). For example, CCA Sections 30001.5 and 30240 address the State's intent to protect and maintain the environmental quality, natural resources, and habitat values of the coastal zone through judicious management of this zone and adjacent areas. As a consequence, the construction of Taxiway H would require

AUD-42

GP/LCP amendments, a Coastal Development Permit, and many tiers of approval, including by the California Coastal Commission.

The Taxiway H area lies largely within the Goleta Slough Ecological Reserve (GSEMP), which contains a total of 34 acres under direct CDFW ownership and 400 acres owned by the City but managed under a binding cooperative agreement between the City and the CDFW (see LCP C-1. Note: City and CDFW maps do not agree on boundaries and acreage of the GSER, which needs to be rectified). Under California Code of Regulations, Title 14, Division 1, Subdivision 2, Chapter 11 and California Ecological Reserves Act of 1968 provisions, the purposes of State Ecological Reserves are to protect threatened and endangered native plants, wildlife, aquatic organisms, and specialized terrestrial or aquatic habitat types. The analyses outlined above and in the RDEIR, however, show that the construction and use of the proposed Taxiway H extension would violate the purpose and acceptable uses for Ecological Reserves.

AUD-42 (cont'd)

Besides the impacts of Taxiway H development on important habitats and sensitive species, the provisions of the current Wildlife Hazards Management Plan (WHMP, apparently a 2008 draft whose FAA approval status is unknown) and recommendations of the Wildlife Hazards Assessment (WHA, App. B) violate numerous GP/LCP policies, Coastal Act sections, state and federal statutes regarding wildlife and bird protections, and the intent and management of state Ecological Reserves. The analysis of the WHMP is part and parcel of evaluations of the AMP and its DEIRs, because of WHMP impacts on natural resources and sensitive species, with WHMP activities potentially increasing with the construction and maintenance of the Taxiway H extension and its safety areas. The RDEIR recognizes the importance of the WHMP as a key component of the Airport Master Plan, both by discussing it and by including the WHA as RDEIR Appendix B. In general, WHMP activities, including mowing, soil disturbance, the taking (killing, trapping) of migratory birds or wildlife species, use of pesticides, and hazing programs are not allowed inside Ecological Reserves. As a consequence, the City of Santa Barbara through its Airport WHMP has violated many of the underlying terms associated with its co-operative agreement and the restrictions associated with state Ecological Reserves.

The original 1988 MOU between the City and the CDFW for the Ecological Reserve did stipulate that mowing would be allowed within areas of the GSER, but with the avoidance of wetlands. The MOU, however, shows the presence of wetlands within the Taxiway H area, where mowing was to be avoided; however, the Airport subsequently mowed most of the area between the current Runway 7-25 and Carneros Creek, abrogating the terms of the MOU as well as AMP provisions to limit mowing to limited distances from taxiways and runways (within 135 feet of paved surfaces, Title 29, Airport Zoning, 29.25.40 A-2). Ecological Reserves also do not allow the harassment, killing, or trapping of wildlife, but the WHMP provides for all of these activities, depending on the hazard assessments of a Patrol Officer or Operations staff; however, it is not clear how Airport personnel arrive at their assessments and decide to take action, and how often and where these actions have occurred. Because depredation permits are often short-term (e.g., 10 days for CDFW), it is unclear if Airport personnel can obtain permits in time to address short-term wildlife hazard problems or if they abide by the provisions (e.g., time limits) of depredation permits. We applaud the WHA recommendations for the Airport to hire a qualified Wildlife Coordinator and for detailed, systematic record keeping of wildlife hazard actions, which has been lacking. Although the WHA calls for the creation of a Wildlife Hazards Management Group, this group would be composed entirely of Airport personnel and does not include any wildlife biologists from regulatory agencies (CDFW, US FWS). The Airport's outdoor rodent control program has the potential to violate many local, state, and federal regulations. Although rodent control measures are included as an ongoing component of the WHMP (Table 4F in the original DEIR), the WHA (Appendix B in the RDEIR) is strangely silent about this component of the WHMP. To evaluate the impacts of this program as an element of the AMP, the EIR needs to provide much more detailed information about the methods, location, extent, frequency, and impacts of rodent control activities.

AUD-43

SBAS is also concerned about other provisions or recommendations of the WHMP/WHA, including the maintenance of perimeter fences that inhibit wildlife migration and the replanting of restoration areas with plants unattractive to wildlife. Although the CDFW expressed concerns about the maintenance of perimeter fences, which were mentioned in the RDEIR, the RDEIR needs to specify how CDFW concerns were integrated into plans for perimeter fence management. Further, the native plants used in restoration efforts should be tailored to the environmental conditions present at that site, because each plant species is adapted to a specific set of hydrological, inundation, chemical, and edaphic conditions. To stipulate that plants must be selected to minimize attractiveness to wildlife abrogates every principle of sound restoration ecology, decreasing the value of restoration efforts for the entire ecosystem by excluding key wildlife species and reducing the diversity and functions of a healthy ecosystem.

The WHMP is included in the AMP and its DEIRs (WHA, Appendix B in RDEIR) and is a key element of the current AMP, which will likely be affected by the proposed Taxiway H extension. As a consequence, the WHMP and its provisions need to be carefully evaluated as part of the EIR because of its impacts on wildlife, a key natural, public trust resource protected by the State of California. Problematically, the WHMP and WHA were not presented to, or discussed by, the Goleta Slough Management Committee, which is charged with providing for a healthy Goleta Slough ecosystem (Policy P-1). The current WHMP appears to violate numerous wildlife protection statutes and regulations, and should be carefully overhauled with advice from wildlife biologists from regulatory agencies (CDFW, US FWS). For example, CDFW Code, Article 8, Sections 3470-3472.2, which deals specifically with balancing wildlife protection with airport operations, indicate that the current Airport WHMP is not consistent with reporting requirements and provisions prohibiting the take of fully protected species. In general, the WHMP undermines efforts of regulatory and advisory personnel to create a healthy, functioning ecosystem, often harming the very species that wildlife protection statutes and regulatory agencies strive to protect. Further, the federal Office of Inspector General issued a 2012 report alleging that the FAA had been negligent in its oversight of Wildlife Hazard Mitigation programs (https://www.oig.dot.gov/sites/default/files/wildlife%20report.pdf), casting doubt on the sensitivity, validity, and effectiveness of this whole program.

AUD-43 (cont'd)

To put wildlife hazard risks into context, per capita risks for human mortality caused by aircraft bird strikes are much lower than per capita mortality risks attributable to lightning or bee stings. Further, aircraft accidents are generally attributed to pilot error or mechanical failure, with wildlife strikes constituting a minor fraction of the total. Air travel is much safer, per mile, than other types of transportation, emphasizing the low risk of damage caused by aircraft wildlife strikes. Although it could be argued that it is precisely the existence of WHMPs that result in low wildlife strike damage, wildlife hazard risks need to be carefully balanced against impacts on native, sensitive, and protected species, particularly in habitats as sensitive as Goleta Slough, following FAA, Title 49, US Code 47101(a)(b). The current WHMP and recently-completed WHA do not appear to effectively balance these twin needs.

Inadequacies in impact analyses and proposed mitigations for habitat loss and sensitive species responses

Possible mitigations for the impacts of the proposed Taxiway H extension on sensitive bird species are inadequate. Although the RDEIR contains provisions for surveying, monitoring, and avoiding nesting birds during construction, it does not guard against impacts on nesting birds during routine operations or maintenance activities. Further, RDEIR mitigations concentrate on AMP impacts on nesting birds; however, all life history stages, including adults and juveniles, of migratory species covered under the Migratory Bird Treaty Act of 1918 and of state-listed endangered or fully protected species must be protected. The RDEIR also was negligent in not delineating areas that needed to be surveyed for nesting birds. If bird breeding

AUD-44

seasons cannot be avoided, CDFW policy for CDFW Code 3503 (and 3503.5), which protects nests and eggs, stipulates that non-disturbed buffers of 500 feet for nesting raptors and 300 feet for other nesting native birds should be maintained. As a consequence, all areas up to 500 feet from the proposed Taxiway H construction and operation zone need to be surveyed and monitored for raptor nests (300 feet for nests of other birds) during the breeding season, encompassing Carneros Creek's riparian zone, which lies 250 feet from the proposed Taxiway H. A related inadequacy is that the RDEIR does not address the impacts of noise or light levels on wildlife or bird species, either during the construction of the proposed Taxiway H or during normal Airport operational and maintenance activities.

AUD-44 (cont'd)

AUD-45

As analyzed above and in the RDEIR, the proposed Taxiway H and its safety areas potentially violate numerous provisions of the Santa Barbara GP/LCP (Policy 1.1, ER 12, C-1, 4, 10, 11, 15; Airport Zoning LCP 29.25.030) and Coastal Act (30001.5), as well as the co-operative binding agreement between the City of Santa Barbara and the CDFW (LCP C-1). Although the LCP must be consistent with the Goleta Slough Environmental Ecosystem Plan (GSEMP, C-10), the proposed Taxiway H contradicts many guidelines in the 2015 Goleta Slough Sea Level Rise/Management Plan (most recent GSEMP). Although LU/mm-2 proposes doing a detailed analysis of AMP consistency with the GSEMP at the project level in the future, this analysis should be done in the AMP's EIR, because the GSEMP is largely a programmatic document, warranting a programmatic congruency analysis between the AMP and GSEMP at this time. In fact, there are numerous conceptual, programmatic analyses that can and should be done in the EIR to check for general congruency between the AMP and local, state, and federal plans, regulations, statutes, or ordinances, rather than "kicking the can down the road" to defer such analyses and proposed mitigations to specific projects, obviating aspects of LU/mm-1.

AUD-46

AUD-47

SBAS's position, then, is that plans for the proposed Taxiway H extension should be abandoned because of its extensive environmental impacts on a sensitive, protected ecosystem and because alternatives can address many safety concerns without compromising the environmental integrity of the Slough (see below). We note that about 90% of the 12.4 acre footprint for Taxiway H lies within the Goleta Slough Ecological Reserve (GSER). Instead of abandoning Taxiway H plans, however, the AMP proposes to mitigate environmental damages accruing from the construction and use of the Taxiway H extension by trading the Taxiway H area inside the GSER for undeveloped areas elsewhere in the Slough. Partly towards this end, the RDEIR proposes 4 mitigation areas (MAs) within Goleta Slough; however, MAs 1 and 2 already lie entirely within the GSER and approximately 2 – 3 acres of MAs 3 and 4 also lie within the GSER (these 2 – 3 acres were already restored as mitigation for work in Airport safety areas, 1997), leaving 21.7 acres for mitigation. The degree to which this swap is in-kind and of adequate extent, however, cannot be determined without accurate vegetation maps. It is likely and, to some extent the RDEIR recognizes, that at least parts of the Taxiway H area may contain jurisdictional wetlands. The mitigation ratio for seasonal wetlands is 4:1 (LCP C-11). More importantly, MAs 3 and 4 border Taxiways A and M and Runway 15R, so will be subjected to disturbance, noise, and lighting impacts that discourage use by wildlife and bird species, reducing their value to the Slough's biota. In any case, because MAs 3 and 4 will likely remain undeveloped, the net impact of the proposed Taxiway H on the Goleta Slough ecosystem will be the loss of undeveloped, open areas (i.e., those areas within the Taxiway H footprint). In conclusion, then, the construction of the proposed Taxiway H extension results in net losses to the Goleta Slough ecosystem and sets a very bad precedent by simply changing the boundary of the GSER when environmental concerns conflict with development plans, compromising City mandates for astute environmental stewardship (e.g., LCP Policies 1.1, 1.2, C-1).

AUD-48

If the City and Airport persist with plans for the Taxiway H extension despite these concerns, SBAS believes that the AMP and its EIR could explore a variety of additional mitigation measures. Because the construction of the Taxiway H extension involves a change in the GSER boundaries and configuration, and affects

AUD-49

important estuarine habitat, we believe that the mitigation ratios for the construction of Taxiway H in an Ecological Reserve should be greater than 1:1. Of course, if wetlands are documented in this area (and they have been in the past), then mitigation ratios will have to be higher. In addition, the City and Airport could explore other mitigation options such as support for a program to preserve or restore upland raptor habitat in Goleta Slough and its environs or financial support for a part or full-time CDFW manager for the GSER.

AUD-49 (cont'd)

Inadequacies in analysis of AMP alternatives.

The original DEIR did not adequately analyze alternative configurations, which could balance safety and environmental concerns. The proposed Taxiway H extension would only be used by a narrow subset of Airport users, that is westbound private and corporate aircraft, and would not be needed by commercial aircraft or eastbound light aircraft. The Environmentally Superior Alternative, which is the proposed AMP without the Taxiway H extension, does provide a connector between Runway 7-25 and the northern side of the Airport near Building 317. Westbound light aircraft with short landing distances could complete their landings before attaining this connector, allowing them to turn directly into the northern hangar areas. Westbound large jets or cargo planes could use Taxiway A to proceed to the eastern end of the Airport, where they would cross 7-25 at its eastern end to access hangars in the northeastern (FBO) part of the Airport property or other northern areas via the existing Taxiway H. In general, then, the safety concerns listed in the DEIR and RDEIR primarily affect only westbound private and corporate planes, which could be solved, if possible, by altering approach patterns and by routing planes on routes under the Environmentally Superior Alternative that would deliver them directly to the hangars they use. In any case, additional analysis is needed to quantify the actual projected use of the proposed Taxiway H extension by different types of aircraft, the on-site destinations of planes after landing, and safety risks associated with the AMP, both with and without the proposed Taxiway H extension. SBAS would be happy to assist the Airport and City in finding funding sources that would cover the costs of such a detailed risk analysis. Further, the role of the air traffic control tower, which lies in close proximity to the Taxiway H area, should not be underestimated, providing for the safe, controlled movement of aircraft on the ground. Given the high financial and environmental costs of the Taxiway H extension, it appears quite feasible to safely operate much less expensive alternatives.

AUD-50

No demonstrated need for many AMP elements, environmental impacts of impervious surface changes

The AMP was based on FAA enplanement projections made in November, 2012. Comparisons of FAA statistics for 2015 for Santa Barbara Airport enplanements showed that projected enplanements for 2015, based on interpolations from the 2012 estimates, substantially exceeded (by 24%) actual 2015 enplanements, suggesting that the FAA enplanement projections are outdated and inaccurate. The most recent FAA statistics for Santa Barbara Airport also show that enplanements decreased by about 5% from 2014 to 2015, and that the Airport is operating at about 42% of capacity (rather than the 48% reported for 2011). Because capacity expansion planning is not mandated or warranted until Airport capacity reaches 60%, there is no need for capacity improvement planning. Although the proposed terminal and car park expansions are presented as efficiency improvements, the terminal expansion, in particular, appears to increase airport capacity. In any case, there are no DEIR analyses or arguments to evaluate the efficiency of the terminal expansion and car park consolidation and expansion proposals.

AUD-51

SBAS's major environmental concerns about the parking lot and terminal expansion components of the AMP revolve around changes in the amounts, locations, and uses of impervious surfaces with resulting impacts on contaminant runoff and water quality. Although the RDEIR argues that best management practices, restrictions associated with regulatory permits, stormwater management plans, and other measures will reduce the AMP's impacts on water quality to Type III, this is one aspect of the plan that cannot be evaluated until

AUD-52

projects and mitigation measures are described in detail (e.g., at the project-specific level). Because Goleta Slough is a 303 d – listed water body, the addition of specified, additional contaminants to this system is not allowed.

AUD-52 (cont'd)

Other environmental impacts

The RDEIR should include a detailed analysis of Airport buildings in designated floodways, their status as historic buildings, and plans to remove these buildings from floodways. Although SBAS applauds the abandonment of buildings, such as those associated with the maintenance yard along Carneros Creek, the RDEIR needs to stipulate that such buildings and their foundations will be removed. Further, for future planning, the Airport needs to look carefully at removing all buildings in floodways, including those along Tecolotito, Carneros, and San Pedro Creeks, to improve environmental conditions and reduce flood risks.

AUD-53

SBAS initially commented about the environmental and safety impacts of the proposed fuel farm expansion in the AMP. Although the RDEIR addressed the water quality impacts of this AMP component, it did not address the safety issues. Given the presence of the proposed fuel farm along a major transportation artery (Hollister Avenue) and its proximity to a commercial district, a detailed analysis of the safety issues associated with fuel farm expansion is warranted.

AUD-54

Conclusions

As recognized by the RDEIR, the Santa Barbara Airport (SBA) is a non-hub, destination, and local facility currently operating at far less than capacity. The Airport lies in a 100-year floodplain and many parts, including the west end of the proposed Taxiway H extension, lie in floodways. The 2015 GS SLR/MP shows that many southern areas of the airport will be flooded owing to sea level rise in the future. Future costs for Airport maintenance in the face of floods and sea level rise could be substantial. SBAS strongly opposes the proposed Taxiway H extension because of its high financial and environmental costs, including the net loss of important components of the Goleta Slough ecosystem, with uncertain improvements in Airport safety. We believe that alternative configurations, such as the Environmentally Superior Alternative, can result in safety improvements without harming the environment. We recognize the tremendous amount of work devoted to the AMP and its DEIRs and hope to assist the City and Airport with developing AMP modifications that guarantee a high degree of safety while protecting environmental amenities, and at the lowest possible cost.

AUD-55

Scott D. Cooper

Scott D. Cooper
Co-Chair, Santa Barbara Audubon Society Conservation Committee

Cherie Topper
Executive Director, Santa Barbara Audubon Society

Response to Recirculated Draft Program EIR - Letter 7
Santa Barbara Audubon Society (AUD)
Dated September 8, 2016

*AUD-1 through AUD-32 are included in **Appendix A** of this Final Program EIR.*

AUD-33: This comment identifies the commenter's mission and history with the Goleta Slough Management Committee (GSMC), and is a duplicate comment (see AUD-1).

Response: Thank you for your comment.

AUD-34: This comment states that the Recirculated Draft Program EIR did not address many of the commenter's concerns as provided in its letter of October 30, 2015, on the Draft EIR.

Response: Refer to Response to Comments AUD-1 through AUD-32 in **Appendix A** of this Final Program EIR for responses to those concerns not addressed within the Recirculated Draft EIR. See also the following response to comments AUD-35 through AUD-55.

AUD-35: This comment summarizes the main premises of the letter. Specific points of these premises are contained in the remainder of the letter.

Response: Comment noted. Specific responses to individual points are provided in later responses.

AUD-36: This comment states that the Airport Master Plan is based on outdated and inaccurate Federal Aviation Administration (FAA) projections and does not analyze the safety and efficiency impacts of the Airport Master Plan components. It also opines that the Master Plan provisions are not needed, will have significant impacts on the Goleta Slough ecosystem, and will constitute significant drains of public resources in the future.

Response: The proposed Airport Master Plan is based on FAA-approved forecasts, which use national and regional trends in aviation growth. While the forecasts may or may not be realized within the planning horizons of the proposed Master Plan (i.e., 20 years), they allow the Airport to formulate a capital improvement plan to meet the potential demand. As with any capital improvement plan, it will be adjusted to reflect actual need, typically on an annual basis. Capital improvements that are not related to safety, such as a larger terminal, will not be carried out unless actual demand is realized.

Conversely, proposed safety improvements of the Airport Master Plan are based primarily on FAA Advisory Circular (AC) 150/5300-13A, *Airport Design* (FAA 2014), which states in Section 101c, Existing Airports, "Every effort shall be made to bring an airport up to current standards." In addition, grant assurances required for Federal funding at the Airport require that the Airport be operated in "a safe and serviceable condition and in accordance with the minimum standards as may be required or prescribed by applicable Federal, state and local agencies for maintenance and operation. It will not cause or permit any activity or action thereon which would interfere with its use for airport purposes" (Grant Assurance No. 19). Therefore, the City is required by Federal regulations to continue to invest money to maintain the safety of the Airport.

Most safety-related airport capital improvement projects are financed through grants from the Federal Airport Improvement Program (AIP), which is funded through the *FAA Modernization and Reform Act of 2012*. Eligible airports within the National Plan of Integrated Airport Systems (NPIAS) (including Santa Barbara Airport) receive funding for AIP-eligible projects under a cost-sharing arrangement in which the FAA provides more than 90 percent of the cost and the airport sponsor invests the remaining amount. In California, the remaining cost is often split between the local airports and funding grants from the California Department of Transportation.

The source for the Federal AIP funds is the Aviation Trust Fund, which also finances the operation of the FAA. It is funded by airport user fees, including taxes on airline tickets, aviation fuel, and various aircraft parts. Within California, taxes levied by the State on aviation fuel, flight property, aircraft registration tax, and registration fees, as well as interest on these funds, are used to fund the State-matched grants. The portion of a project to be funded by an airport is financed through the airport's own system of user fees, lease rates, and charges. These revenues are generated through trust funds set up through enabling legislation and are provided by aviation-related sources. The funds are not collected through general sales taxes, property taxes, or income taxes that come from the populace at large.

Regarding concerns about impacts to the Goleta Slough, refer to responses to the remaining comments in this letter as they address the commenter's concerns in more detail.

AUD-37: This comment discusses the importance of a diversity of habitats to support a healthy estuarine environment, and states that the Recirculated Draft Program EIR's analysis of impacts to upland habitat and species is inadequate.

Response: The Final Program EIR has been revised to include references to upland habitat under Impact BIO-1. In addition, BIO/mm-1 includes compensatory mitigation for upland habitat, where appropriate. It is important to note that the Program EIR is not intended to take the place of future project-specific environmental evaluation at the time a recommended project is ripe for review. BIO/mm-1 is a Programmatic Mitigation Plan (PMP) that provides the framework for future Habitat Mitigation and Monitoring Plans (HMMPs) related to the impacts of a specific

project. The PMP includes measures to enhance and restore biodiversity in the Slough. See also Topical Response # 2.

AUD-38: This comment states that the Recirculated Draft EIR fails to adequately address the impacts of the proposed Taxiway H Airfield Safety Project.

Response: The Program EIR provides programmatic analysis of the Airport Master Plan, which is a facility-planning document and capital improvement program. The Program EIR provides an assessment of the potential impacts that could occur from plan implementation, but does not have adequate design details for individual projects to provide a project-specific level of analysis on any future capital improvement projects. The Taxiway H project, in particular, cannot be constructed in the near future due to the number of regulatory steps involved and amount of funding that must be procured. Future environmental review of this project will include additional site-specific survey efforts.

The Airport has collected a large amount of bird data as part of its recent Wildlife Hazard Assessment (Dudek et al. 2016). This report was appended to the Recirculated Draft Program EIR to provide the most up-to-date data available.

AUD-39: This comment states that the proposed Taxiway H Airfield Safety Project area constitutes important raptor foraging and migration habitat.

Response: Refer to Topical Response #1. A technical memorandum has been prepared to evaluate the potential for project-specific or cumulative impacts to foraging habitat for the white-tailed kite (*Elanus leucurus*), specifically from the proposed Taxiway H Airfield Safety Project (Final Program EIR, **Appendix C**). The analysis concludes that although brome grasses like those present at the proposed Taxiway H project site are considered to provide suitable foraging for kites, the lack of small mammals (based on recent trapping efforts), the absence of kites in the area north of the runway (during a year-long survey effort), and the distance of the Taxiway H project site from known nest locations (Final Program EIR, **Appendix C**, **Figure 1**) suggest that the area only provides low-quality foraging habitat for nesting white-tailed kites. While approximately 498 acres of suitable kite foraging habitat has been, or is anticipated to be, impacted in the region by past, present, or probable future projects (Final Program EIR, **Appendix C**, **Table 1**), there are over 4,500 acres of annual grasses and forbs within the cumulative study area (Final Program EIR, **Appendix C**, **Figure 2**). Relative to the amount of available habitat in the region, the loss of 6.1 acres of low-quality foraging habitat is considered less than significant, both on a project-specific and cumulative level.

AUD-40: This comment states that the Airport's wildlife habitat management program is in violation of local, State, and Federal provisions for the protection of wildlife species and is more extensive than is warranted by the wildlife risks incurred.

Response: The Airport's Wildlife Hazard Management Plan (WHMP) is not a part of the proposed Airport Master Plan. It is a document required by Federal law and was approved by FAA on February 27, 2017. Discussion of wildlife hazard management for the Airport in the Program EIR is within the context of Applicable Plans and Policies (Section 4.2.2) related to biological resources.

AUD-41: This comment states that there are inadequacies in the mapping depicting vegetation types in the Goleta Slough, which minimize the value of the Taxiway H area by stating that it is covered by fill or brome grassland.

Response: The vegetative maps were completed by a qualified biologist with extensive local experience, including in-depth knowledge of the Goleta Slough. Wetland and sensitive-species surveys of the Goleta Slough used in this Program EIR were conducted in 2012 as part of the Master Plan resources inventory, and occurred before the most recent drought was in full effect. The Notice of Preparation for this Program EIR was issued in 2014. However, because this was a year of drought conditions, earlier surveys prior to the drought were used. More complete site-specific vegetative and wildlife surveys will occur when project-specific analyses and HMMPs are prepared.

AUD-42: This comment states that there are inconsistencies with management and land use restrictions associated with the Goleta Slough Ecological Reserve, the City of Santa Barbara's General Plan and Local Coastal Plan (LCP), the *California Coastal Act*, and the 2015 *Goleta Slough Area Sea Level Rise and Management Plan* (Slough Management Plan).

Response: This comment refers to the Taxiway H Airfield Safety Project, which will undergo future environmental review at the time it is proposed for funding and project design details are available. The Program EIR discusses the fact that this project will require an LCP amendment, General Plan amendment, coastal development permit, and a revision to the Goleta Slough Ecological Reserve boundary and associated zoning. These are discretionary actions that will require their own environmental review.

AUD-43: This comment restates the commenter's views on the Airport's wildlife hazard management program in more detail.

Response: Refer to Response to Comment AUD-40.

AUD-44: This comment states that possible mitigations for the impacts of the proposed Taxiway H Airfield Safety Project on sensitive bird species are inadequate and that all stages of

migratory species covered under the *Migratory Bird Treaty Act* and of state-listed endangered or Fully Protected species must be protected.

Response: The *Migratory Bird Treaty Act*, as well as other regulations, prohibit the take of protected birds without a permit. While it is true that a take could occur during all stages of a bird's life, due to the mobility of avian species, extra precaution is warranted during the nesting season. BIO/mm-3 states that a bird survey by a qualified biologist must find that no bird breeding habitat exists within 300 feet of the disturbance area (500 feet for raptors) or can state with certainty that such habitat does not contain nesting birds.

AUD-45: The comment refers specifically to the construction, operation, and maintenance of a future Taxiway H Airfield Safety Project and states that the Recirculated Draft EIR does not address the impacts of noise or light levels on wildlife or bird species.

Response: Refer to Responses to Comments CDFW-42 through CDFW-48, which address noise effects on wildlife and bird species in additional detail. With respect to the physiological effects of noise on wildlife species, it should also be noted that the proposed Master Plan neither dictates nor anticipates major changes to the composition of aircraft utilizing the airport. The update is primarily aimed at improving airfield safety and security by segregating the general aviation activities (which essentially involve lighter piston-engine airplanes and corporate grade jet aircraft) from commercial airline activities.

Lighting changes due to implementation of the proposed Master Plan would be minimal. Proposed Airport Master Plan activities would be confined to the existing operational areas of the Airport, including the Taxiway H Airfield Safety Project. Taxiway lighting for the Taxiway H Airfield Safety Project would only minimally increase the overall lighting content of the airfield system due to the stronger lighting used for the runway. See FAA Advisory Circular 150/5345-46E, *Specification for Runway and Taxiway Light Fixtures* (FAA 2016).

AUD-46: This comment states that the Taxiway H Airfield Safety Project and its safety areas potentially violate provisions of the Santa Barbara General Plan and LCP. The comment specifically calls out GP/LCP Policy 1.1, ER 12, C-1, 4, 10, 11 and 15 as well as the Airport Zoning LCP 29.25.030 and Coastal Act Section 30001.5.

Response: Comment noted. The Recirculated Draft Program EIR states in Result LU-4, "The proposed Master Plan would not conflict with any applicable LCP policy adopted for the purposes of avoiding or mitigating an impact to coastal resources. However, recommended projects, such as the proposed Taxiway H Airfield Safety Project, could result in inconsistencies with LCP policies related to Goleta Slough. See Section 4.6.7 for programmatic mitigation measures to be applied to future development projects occurring under the proposed Master Plan, and Section 4.2.7 for programmatic mitigation measures provided to ensure consistency with LCP policies for the protection of the Slough." It should be noted that the Taxiway H project will include a project-

specific HMMP, which should be taken into consideration when assessing its consistency with coastal policies.

AUD-47: This comment states that the Taxiway H project contradicts many guidelines in the Slough Management Plan and that a detailed analysis of the proposed Master Plan and the Slough Management Plan should be performed in the Program EIR.

Response: Since this comment does not specify which guidelines in the Slough Management Plan it feels are not being followed, this response can only address the comment generally. The Airport Master Plan contains a PMP (BIO/mm-1) that specifically considers the policies and goals of the Slough Management Plan. The Airport has presented the PMP to the GSMC to solicit comments (see letters from the GSMC in both **Appendix A** and this appendix). BIO/mm-1 also specifically states that future HMMPs will similarly be present to the GSMC for review and comment. See also Response to Comment AUD-46.

AUD-48: This comment provides the commenter's opinion of the Programmatic Mitigation Plan presented in the Recirculated Draft Program EIR, including comments on specific mitigation areas and ratios. This comment also states the commenter's opposition to the Taxiway H project on environmental grounds.

Response: The final PMP includes additional potential mitigation areas and increased mitigation ratios (see BIO/mm-1 of the Final Program EIR and Topical Response #2). These areas and ratios were coordinated with the California Department of Fish and Wildlife based on a field visit and agency review of the revised mitigation measure.

AUD-49: This comment states that if the City continues to pursue plans for the Taxiway H Airfield Safety Project, then additional mitigation measures should be pursued, including higher mitigation ratios, a program to preserve or restore upland habitat, or financial support for a part or full-time California Department of Fish and Wildlife manager for the Goleta Slough Ecological Reserve.

Response: See Response to Comment AUD-48. In addition, while this comment identifies a strategy to aid in the management of Goleta Slough, there is no nexus between adoption of the proposed Airport Master Plan and the proposed mitigation. Except for the Taxiway H Airfield Safety Project, which would be a one-time capital improvement project, implementation of the Master Plan is within the developed portions of the Airport, not the Goleta Slough.

AUD-50: This comment proposes an alternate taxiway configuration to the Environmentally Superior alternative as well as recommends alternate approach patterns as a way to implement the Environmentally Superior alternative.

Response: FAA AC 150/5300-13A states the following: "A parallel taxiway eliminates using the runway for taxiing, thus increasing capacity and protecting the runway under low visibility conditions. In addition, a full length parallel taxiway is required for instrument approach procedures with visibility minimums below ¾ mile and recommended for all other conditions." AC 150/5300-13A also states that, "The airport designer must keep basic concepts in mind to reduce the probability of runway incursions through proper airport geometry. This is particularly important when designing a taxiway system." Two of these basic concepts that apply to taxiway design are detailed below.

> "(c) Limit runway crossings. The airport designer can reduce the opportunity for human error by reducing the need for runway crossings. The benefits of such design are twofold – through a simple reduction in the number of occurrences, and through a reduction in air traffic controller workload."
>
> "(d) Avoid "high energy" intersections. These are intersections in the middle third of the runways. By limiting runway crossings to the outer thirds of the runway, the portion of the runway where a pilot can least maneuver to avoid a collision is kept clear."

This comment suggests that when the Airport is in a "west flow" condition (Runway 25), small landing aircraft could exit off the runway to the north on existing taxiway connectors (Taxiways B, M, and C) and would not require the use of a Taxiway H Airfield Safety Project. In general, according to AC 150/5300-13A (Table 4-13) (FAA 2014), which establishes the minimum distances needed for landing on wet runway conditions based on aircraft size and weights, this suggestion would hold true for 99 percent of the small single-engine aircraft under 12,500 pounds at the Airport. However, only 41 percent of small twin-engine aircraft under 12,500 pounds could use Taxiways B, M, or C under wet runway conditions.

Thus, if the Environmentally Superior alternative is implemented, approximately 59 percent of the small twin-engine aircraft using Runway 7-25, as well as all the larger aircraft (>12,500 pounds) that need to go to the north side of Runway 7-25, would go to the west end of the runway, turn south onto parallel Taxiway A, and then cross the runway at the east end. Besides crossing the end of Runway 7, this would also result in these aircraft mixing in with other aircraft that need to depart on Runway 25 as well as a need to cross both crosswind runways (Runway 15R-33L and Runway 15L-33R). Continuing this practice in the future would result in additional safety concerns, increased potential for runway incursions, increased taxiing times, delays to both arriving and departing aircraft, and increased air traffic controller workload. It would also route additional aircraft through another taxiway hot spot (i.e., Hot Spot #4, Airport Master Plan, Exhibit 4C).

This comment also suggests that safety concerns could be solved "by altering approach patterns and by routing planes on routes under the Environmentally Superior alternative that would deliver them directly to the hangars they use." This comment suggests that aircraft should arrive from the west and then use the connector taxiways located on the north side of Runway 7-25.

For safety purposes, aircraft should take off and land into the wind. The air traffic controllers cannot change the flow of traffic so that aircraft land with a tailwind, which would create an unsafe operating condition. Also, when the Airport is in a "west flow" condition (60 percent of the time), the air traffic controllers cannot select specific aircraft that want to access facilities on the north side of the Airport and have them land from the west. This would result in an extremely dangerous "head-to-head" operating condition.

Finally, it should also be noted that when the Airport is in an "east flow" condition (Runway 7), which occurs approximately 40 percent of the time, 100 percent of the aircraft on the north side of Runway 7-25 that require Runway 7 for departure, would need to cross Runway 7-25 to utilize Taxiway A for access to the western end (Runway 7). In conclusion, the alternate taxiway configuration and approach patterns suggested in this comment will not improve safety at the Airport and are not likely to be approved by the air traffic control tower.

AUD-51: This comment reiterates the position that the enplanement forecasts used in the proposed Airport Master Plan are "outdated and inaccurate" and that since capacity expansion planning is not mandated or warranted until the Airport capacity is at 60 percent, there is no need for proposed terminal and car park expansions. The argument is that these landside improvements increase airport capacity.

Response: Refer to Response to Comment AUD-36 for information regarding the development and usefulness of the Master Plan forecasts. An airport's capacity is determined by its airfield capacity, not its landside improvements such as a terminal or automobile parking lots. There are no airfield capacity improvements recommended in the proposed Master Plan.

AUD-52: This comment states that the recommendations concerning terminal and parking lot expansion will change the amounts, locations, and uses of impervious surfaces with resulting impacts on contaminant runoff and water quality.

Response: The area recommended for future terminal and parking expansion is currently paved as part of the existing rental car lot and general aviation apron. However, if these projects move forward, additional study of drainage will occur as part of detailed project design. At that time, additional environmental study of potential water quality impacts may be necessary. However, State and City regulations are in place to assure no substantial effects pertaining to runoff and water quality.

AUD-53: This comment states that the Program EIR should look at all airport buildings located in designated floodways and that all buildings and their foundations should be removed.

Response: The proposed Master Plan includes the relocation of two specific historic buildings from the designated floodway. Other land uses, such as the maintenance yard, are planned for

relocation, although the buildings themselves may be reused until they are too costly to maintain. At that time, additional environmental review will occur, as necessary, to evaluate future uses or removal of the buildings and/or their foundations.

AUD-54: This comment asks for details about the safety risks of increased gas storage at the Airport fuel farms.

Response: The Master Plan's Facility Requirements chapter (Chapter 4, Table 4L) identifies the Airport's fuel storage requirements, based on a two-week supply, if the Airport reaches the short, intermediate, and long-term planning levels contained in the Master Plan. Based on this analysis, the Airport may need an additional 66,200 gallons of Jet A fuel storage capacity by the long-term planning period. Accordingly, the Master Plan recommends that the additional storage be accommodated at the Airport's existing fuel farm. However, this is not a project that is listed in the Airport's Capital Improvement Plan for the 20-year planning timeframe because the expansion of the fuel farm would be funded privately by the fixed base operator.

Due to the myriad of existing regulations and the implementation of spill prevention control and countermeasure (SPCC) plans at the Airport, this potential increase in fuel storage was found to have Less than Significant impacts within the Initial Study and did not warrant further evaluation at the programmatic level. See also the discussion contained in Impact G/HAZ-3 and Result G/HAZ-3 of the Draft EIR, which reiterates the conclusions of the Initial Study.

AUD-55: This comment summarizes several points within the comment letter and reiterates the commenter's opposition to the Taxiway H Airfield Safety Project.

Response: Thank you for your comments. Please refer to the responses to previous comments within this letter.



September 9, 2016

City of Santa Barbara Planning Division
c/o Andrew Bermond, Project Planner
630 Garden Street
Santa Barbara, CA 93101

RE: Comments on Airport Master Plan Draft Recirculated Environmental Impact Report (EIR)

The Goleta Slough Management Committee (GSMC) appreciates the opportunity to comment on the recirculated Draft EIR on the Draft Airport Master Plan. We also appreciate having the full sixty days to review this important environmental document. Our comments on the Draft EIR dated October 30, 2015 are already part of the record and are attached here for your convenience.

As you know, GSMC was established in 1991 and just celebrated our 25th anniversary. We have published several studies that seek to enhance the Goleta Slough Ecosystem's overall health and functions, including the award-winning *Goleta Slough Area Sea Level Rise and Management Plan*. We appreciate being part of the Airport Master Plan (AMP) process and hope that our comments help to make the Master Plan and its programmatic EIR as environmentally beneficial as it can be for the Airport, the Goleta Slough and the surrounding area.

1. **Project approvals and timeline** – The DREIR is still unclear as to what the approval process is expected to be, particularly as it relates to the proposed Taxiway H extension into the Goleta Slough Reserve Zone and Ecological Reserve. For example, at the August 4, 2016 GSMC meeting, it was stated that the intent is to have the Santa Barbara City Council initiate a Local Coastal Plan Amendment to analyze the proposed Taxiway H extension into the Goleta Slough Ecological Reserve (GSER) prior to submittal of the Draft AMP and related LCP Amendment to the Coastal Commission. As about 90 percent of the proposed taxiway extension is in the area designated "Recreation Open Space," we question how General Plan and Coastal Plan conformance can be found for the Airport Master Plan unless an LCP Amendment accompanies the plan. We request that the DREIR clearly outline the steps that the AMP is expected to follow to obtain final adoption by the Coastal Commission. GSMC-30

2. **Clarification of Goleta Slough Ecological Reserve Boundary, acreage and California Department of Fish and Wildlife's role in the Reserve** – At our August 4th and 18th meetings, we discussed the discrepancies in the existing GSER boundary and acreages. It appears that the City's Coastal Plan and Zoning maps were changed several years ago when Runway 7-25 was relocated to the west, but the reserve boundary and cooperative agreement on file with the California Department of Fish and Wildlife, the managers of the Reserve, do not agree with the City's maps. It also appears that the total acres in the Reserve vary from about 360 to over 400. This may seem to be more of a planning than environmental issue but maintaining the official size of the Reserve (if not increasing its size) is important to GSMC. Also, the boundary issue affects the proposed wetland and upland mitigation proposed in the AMP (see #4 and 5 below) so the two are inextricably linked. GSMC-31

Additionally, the discussion of the Ecological Reserve and previous and future encroachments into it have focused attention on the lack of active management of this valuable resource by its stewards, the Department of Fish & Wildlife. We believe that funding needs to be found to provide a part or full time CDFW biologist to manage the GSER. We suggest that a mitigation be added requiring the City to advocate for funding this position on a permanent basis including providing appropriate financial support themselves. GSMC-32

3. **Justification of need for projects and associated impacts –** We understand that enplanement and operations forecasts are an inexact science and changes in the economy, airline ticket prices and other unknowns can greatly affect an airport's operations. However, the DREIR states that the Airport operated at only 48% capacity in 2011. The 2015 enplanements are about 25% less than projected for that year, which calls into question the AMP's assumptions about the need for a larger terminal, increased FBO facilities, etc. Given the Airport's low lying elevation and the likelihood of major flooding and damage due to climate change and increased sea levels, we question the wisdom of spending taxpayer dollars on this facility in this location. GSMC-33

4. **BIO/mm-1, Programmatic Wetland Restoration Plan (PWRP) –** We are concerned that the PWRP defers mitigation to a future date but believe that, generally, sufficient mitigation parameters are given to ensure that future mitigation is likely to be legally adequate. That said, we would like the Goleta Slough Management Committee to specifically be mentioned as one of the reviewing bodies that will be involved in the preparation of the plan. Also, the first component of the plan (p. 9 of the Executive Summary) states that mitigation for wetland habitats, wetland and/or riparian buffer shall be a minimum of 2:1. Although the text states that the mitigation ratios may be required to be higher, we note that the Airport/Goleta Slough LCP Policy C-11 requires a 4:1 replacement ratio for seasonal wetlands. Further, it is not clear that this trade would be adequate as mitigation, depending on mitigation ratios, the location of mitigation areas 3 and 4 at the disturbed intersections of major runways/taxiways, and the general loss of open space areas from the Slough. GSMC-34

   Another important issue to the Committee is that the Slough continues to have a mixture of habitat types, including uplands. Oftentimes wetland mitigation is proposed in upland areas to the detriment of that habitat and the functions and values it provides.

5. **Habitats in Taxiway H extension area** – The DREIR indicates that this area is mowed brome grassland. The *Goleta Slough SLR and Management Plan* shows different vegetation types (see Figure 3-1 in the GSSLR&MP), including a complex mix of vegetation types in the eastern part (mudflat and salt grass wetlands) and sagebrush in the west. Although the 2008 map in the Management Plan is older than those in the DREIR, we believe that mapping is more accurate and should be included, or at least addressed, in the document. GSMC-35

6. **Cumulative loss of foraging, nesting and roosting habitats, particularly for White-Tailed Kites (WTKs) –** Several biologists on our Committee disagree with the EIR's conclusion in Impact BIO-2 that the area where Taxiway H is proposed for extension is not suitable foraging habitat for WTKs. The cumulative loss of habitat for raptors in the Goleta area is alarming and should be addressed in the DREIR. GSMC-36

7. **Require future Subsequent EIR, particularly for Taxiway H extension to west** – GSMC's greatest concern about the AMP is that the proposed Taxiway H extension to the west would impact possible wetland and upland habitats in the Goleta Slough Reserve Zone and GS Ecological Reserve. CEQA Section 15168 states that a project that is generally analyzed in a GSMC-37

Program EIR (which is the case here) needs subsequent environmental review, but that may be an exemption or addendum that does not require public review and comment.

Our concerns would be somewhat allayed if we knew, for certain, that a subsequent EIR will be prepared for the Taxiway H project (and possibly others that warrant further environmental review). We have done some CEQA research and believe that a condition or required mitigation could be added to the effect of "If and when Taxiway H is proposed for implementation and the Programmatic Wetland Restoration Plan (PWRP) is prepared to address potential impacts and mitigation for this project, a Subsequent EIR shall be prepared by the City of Santa Barbara. The Goleta Slough Management Committee, or its successor, shall be included in the development of the Taxiway H project and the drafting of the PWRP."

GSMC-37 (cont'd)

Another approach is to relabel the Programmatic EIR as a Staged EIR per CEQA Section 15167 that states:

> "Where a large capital project will require a number of discretionary approvals from government agencies and one of the approvals will occur more than two years before construction will begin, a staged EIR may be prepared covering the entire project in a general form. The staged EIR shall evaluate the proposal in light of current and contemplated plans and produce an informed estimate of the environmental consequences of the entire project. The aspect of the project before the public agency for approval shall be discussed with a greater degree of specificity.
>
> "When a staged EIR has been prepared, a supplement to the EIR shall be prepared when a later approval is required for the project, and the information available at the time of the later approval would permit consideration of additional environmental impacts, mitigation measures, or reasonable alternatives to the project."

GSMC-38

Thank you for the opportunity to comment on this Draft Recirculated EIR. We look forward to working with you in the future on this important plan and environmental document.

Sincerely,

Pat Saley for the
Goleta Slough Management Committee

Attachment: GSMC letter on Draft EIR dated October 30, 2015

Response to Recirculated Draft Program EIR - Letter 8
Goleta Slough Management Committee (GSMC)
Dated September 8, 2016

*GSMC-1 through GSMC-29 are included in **Appendix A** of this Final Program EIR.*

GSMC-30: This comment requests clarification regarding the approval process for the proposed Taxiway H Airfield Safety Project into the Goleta Slough Reserve Zone and Goleta Slough Ecological Reserve (GSER) as well as Coastal Commission adoption of the proposed Airport Master Plan.

Response: The proposed Airport Master Plan is not required to be adopted by the California Coastal Commission and does not require a Local Coastal Plan (LCP) amendment, General Plan amendment, or rezone for it to be adopted by the City of Santa Barbara. It is a comprehensive capital improvement plan for the Airport that meets the requirements of the Federal Aviation Administration (FAA) as outlined in FAA Advisory Circular (AC) 150/5070-6B, *Airport Master Plans*, as amended (FAA 2015), but does not include discretionary actions for future projects. However, certain projects recommended by the Master Plan, specifically the Taxiway H Airfield Safety Project, would require an LCP amendment, General Plan amendment, and rezone prior to the issuance of a Coastal Development Permit for the project. The timing of these approvals is dependent upon when the City moves forward with the environmental review processes for the project (Federal and State) and when it can acquire project funding.

Because of the complexity of the regulatory processes required for the Taxiway H project, the City will initiate the LCP amendment process, General Plan amendment, rezone, and amendment of the Goleta Slough Ecological Reserve boundary for the Taxiway H project if the Airport Master Plan is adopted. These permits cannot be approved, however, until the State environmental review process for all discretionary actions is complete.

GSMC-31: This comment states that clarification of the GSER boundary needs to occur and potential discrepancies between the City maps and the Slough Reserve boundary on file with the California Department of Fish and Wildlife (CDFW) be resolved.

Response: Comment noted. The City plans to work with CDFW to resolve this issue and has had preliminary conversations with the Department on the subject. Future project-specific Habitat Management and Monitoring Plans (HMMPs) that involve the Goleta Slough must be approved by CDFW and reflect an accurate GSER boundary. LU/mm-3 of the Final Program EIR requires that the City's Cooperative Agreement with CDFW, including the GSER boundary, be amended

prior to approval of any projects affecting the GSER boundaries (such as the Taxiway H Airfield Safety Project) are approved.

GSMC-32: This comment states that the funding of a part or full-time CDFW staff position to manage the GSER should be considered as a mitigation measure for the proposed Airport Master Plan.

Response: While this suggestion identifies a strategy to aid in the management of Goleta Slough, there is no nexus between adoption of the proposed Airport Master Plan and the proposed mitigation. With the exception of the Taxiway H Airfield Safety Project, which would be a one-time capital improvement project that would receive project-specific review and identification of mitigation, implementation of the Master Plan is within the developed portions of the Airport, not the Goleta Slough.

GSMC-33: This comment questions the Airport Master Plan's "assumptions" that a larger terminal, increased fixed base operator (FBO) facilities, etc. will be necessary and questions whether, with climate change and increased sea levels, it is wise to spend taxpayer dollars on the Airport in its present location.

Response: This commenter's opinion is acknowledged. This comment is not on an environmental issue and is outside the scope of the Program EIR responses, but will be forwarded to decision-makers for consideration. For informational purposes, the proposed Airport Master Plan does not assume that a larger terminal, FBO facilities, etc. will be necessary based on current airport enplanement and operation levels. Rather, the Master Plan is based on FAA-approved forecasts, which use national and regional trends in aviation growth. While the forecasts may or may not be realized within the planning horizons of the proposed Master Plan (i.e., 20 years), they allow the Airport to formulate a capital improvement plan to meet the potential demand. As with any capital improvement plan, it will be adjusted to reflect actual need, typically on an annual basis. Capital improvements such as a larger terminal will not be carried out unless it is clear that actual demand will be realized.

Conversely, proposed safety improvements of the Airport Master Plan are based primarily on FAA Advisory Circular 150/5300-13A, *Airport Design* (FAA 2014), which states in Section 101c, Existing Airports, "Every effort shall be made to bring an airport up to current standards." In addition, grant assurances required for Federal funding at the Airport require that the Airport be operated in "a safe and serviceable condition and in accordance with the minimum standards as may be required or prescribed by applicable Federal, state and local agencies for maintenance and operation. It will not cause or permit any activity or action thereon which would interfere with its use for airport purposes" (Grant Assurance No. 19). Therefore, the City is required by Federal regulations to continue to invest money to maintain the safety of the Airport.

Most safety-related airport capital improvement projects are financed through grants from the Federal Airport Improvement Program (AIP), which is funded through the *FAA Modernization and Reform Act of 2012*. Eligible airports within the National Plan of Integrated Airport Systems (NPIAS) (including Santa Barbara Airport) receive funding for AIP-eligible projects under a cost-sharing arrangement in which the FAA provides more than 90 percent of the cost and the airport sponsor invests the remaining amount. In California, the remaining cost is often split between the local airports and funding grants from the California Department of Transportation.

The source for the Federal AIP funds is the Aviation Trust Fund, which also finances the operation of the FAA. It is funded by airport user fees, including taxes on airline tickets, aviation fuel, and various aircraft parts. Within California, taxes levied by the State on aviation fuel, flight property, aircraft registration tax, and registration fees, as well as interest on these funds, are used to fund the State-matched grants. The portion of a project to be funded by an airport is financed through the airport's own system of user fees, lease rates, and charges. These revenues are generated through trust funds set up through enabling legislation and are provided by aviation-related sources. The funds are not collected through general sales taxes, property taxes, or income taxes that come from the populace at large.

GSMC-34: This comment contains specific concerns with BIO/mm-1 as contained in the Recirculated Draft Program EIR, including the role of the GSMC in future mitigation, the proposed mitigation ratios for both wetlands and uplands, and the location of future mitigation areas.

Response: See Topical Response #2. BIO/mm-1 has been revised to include: the GSMC as a reviewer of future HMMPs; higher mitigation ratios; and additional habitat restoration areas. In addition, BIO/mm-1 includes compensatory mitigation for upland habitat, if appropriate, and measures to enhance and restore biodiversity in the Slough. It is important to note that the Program EIR is not intended to take the place of future project-specific environmental evaluation at the time a recommended project is ripe for review. BIO/mm-1 is a Programmatic Mitigation Plan (PMP) that provides the framework for future HMMPs related to the impacts of a specific project. Input from the GSMC has been solicited on the various drafts of the PMP and regular briefings, as well as a Power Point presentation, have been made at GSMC meetings.

GSMC-35: This comment states that the area located in the vicinity of the proposed Taxiway H Airfield Safety Project is characterized as mowed brome grassland, but that older (2008) maps contained in the *Goleta Slough Sea Level Rise and Management Plan* shows the area as including a mix of vegetation types.

Response: The vegetative maps used in the Program EIR were completed by a qualified biologist with extensive local experience, including in-depth knowledge of the Goleta Slough. Additional site-specific vegetative and wildlife surveys will also occur when subsequent project-specific

analyses and HMMPs are prepared. The Program EIR includes references to the Slough Management Plan document.

GSMC-36: This comment states that the proposed Taxiway H area constitutes suitable foraging habitat for the white-tailed kite and that the cumulative loss of foraging habitat for raptors in the Goleta area should be addressed in the Program EIR.

Response: Refer to Topical Response #1. A technical memorandum has been prepared to evaluate the potential for project-specific or cumulative impacts to foraging habitat for the white-tailed kite (*Elanus leucurus*), specifically from the proposed Taxiway H Airfield Safety Project (Final Program EIR, **Appendix C**). The analysis concludes that although brome grasses like those present at the proposed Taxiway H project site are considered to provide suitable foraging for kites, the lack of small mammals (based on recent trapping efforts), the absence of kites in the area north of the runway (during a year-long survey effort), and the distance of the Taxiway H project site from known nest locations (Final Program EIR, **Appendix C**, **Figure 1**) suggest that the area only provides low-quality foraging habitat for nesting white-tailed kites. While approximately 498 acres of suitable kite foraging habitat has been, or is anticipated to be, impacted in the region by past, present, or probable future projects (Final Program EIR, **Appendix C**, **Table 1**), there are over 4,500 acres of annual grasses and forbs within the cumulative study area (Final Program EIR, **Appendix C**, **Figure 2**). Relative to the amount of available habitat in the region, the loss of 6.1 acres of low-quality foraging habitat is considered to be a Less than Significant impact, both on a project-specific and cumulative level.

GSMC-37: This comment requests that a commitment be made to conduct a Subsequent EIR on the Taxiway H and other projects that warrant further environmental review and that the GSMC be specifically allowed to help develop the Taxiway H Airfield Safety Project and the drafting of the Programmatic Wetland Restoration Plan.

Response: See Topical Response #3. All projects recommended in the proposed Airport Master Plan that meet the definition of a project under CEQA and need future discretionary approvals will be required to complete some level of environmental review. It is not appropriate for the type of environmental document to be determined at this time when neither the timing nor the design of such projects is available. As far as the Taxiway H project, BIO/mm-1 has been revised to state that the Airport shall solicit comments from the GSMC on the PMP as well as on all future project-specific HMMPs. The GSMC input has already been solicited on the PMP as evidenced by this letter and the letter previously submitted by the GSMC on the Draft Program EIR.

GSMC-38: This comment requests that the Program EIR be relabeled as a Staged EIR per CEQA Section 15167.

Response: Relabeling the Program EIR as a Staged EIR would require that the proposed Airport Master Plan be considered a large capital project that requires "a number of discretionary approvals from government agencies and one of the approvals will occur more than two years before construction will begin." This is not an accurate description of the proposed Airport Master Plan, which is not a capital project, but a facilities plan, and does not require a number of discretionary approvals for it to be adopted.

The *California Environmental Quality Act* Guidelines allow for the programmatic approach when the project is a "logical part in the chain of contemplated actions" (CEQA Guidelines, Section 15168[a][2]). In this case, Master Plan adoption would be followed by individual project designs and permitting processes, with associated further environmental review.

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SEP 15 2016
CITY OF SANTA BARBARA
PLANNING DIVISION

September 12, 2016

Mr. Andrew Bermond, AICP
City of Santa Barbara, Planning Division
P.O. Box 1990
Santa Barbara, CA 93102-1990
ABermond@SantaBarbaraCA.gov

Subject: Recirculated Program Draft Environmental Impact Report (PDEIR) On the Proposed Airport Master Plan for Santa Barbara Municipal Airport, City of Santa Barbara, California, SCH # 2014061096

Dear Mr. Bermond:

The California Department of Fish and Wildlife (Department) received a Notice of Extension of Public Comment for a PDEIR from the City of Santa Barbara for the proposed Airport Master Plan for Santa Barbara Municipal Airport (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the proposed Project that may affect California's fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the proposed Project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

The Department provided previous written comments dated October 29, 2015, on the previous draft Program EIR. The Lead Agency will formally respond to the previous public comments once a final EIR is prepared (PDEIR ES-20). This letter is intended to supplement our October 29, 2015, comments on the prior draft.

CDFW-19

DEPARTMENT ROLE

The Department is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW-20

1 CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

The Department is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) The Department expects that it will need to exercise regulatory authority as provided by the Fish and Game Code to provide approvals related to the Project. As proposed, for example, the Project may be subject to the Department's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project may seek related take authorization. .

The Department is also the agency responsible for management of Title 14-administered lands which constitute the Goleta Slough Ecological Reserve (Ecological Reserve), as established under a 1987 Cooperative Agreement (Agreement) between the State and City of Santa Barbara. The Ecological Reserve is protected by the California Code of Regulations, title 14, sections 550 and 630; allowable wildlife-dependent activities are described in both code sections; other activities are generally prohibited. (Cal. Code Regs., tit. 14, § 550, subd. (g).) To the extent implementation of the proposed Project will require special authorization for activities to occur within the Ecological Reserve or amendment of the Ecological Reserve boundaries, the Department would also be acting as Responsible Agency under CEQA. CDFW-21

Finally, the Department manages the Goleta Slough State Marine Conservation Area (Marine Conservation Area) which overlaps a portion of the Ecological Reserve. The primary restrictions in the Marine Conservation Area relate to restrictions on public access, boating, and recreational swimming; habitat protections under the California Code of Regulations, title 14, section 632 (Cal. Code Regs., tit. 14, § 632); and no-take zones related to fishing and harvesting marine resources.

PROJECT DESCRIPTION SUMMARY

The City of Santa Barbara (City) is Lead Agency for a recirculated PDEIR for the Santa Barbara Airport Master Plan, located on City-owned lands surrounded by the City of Goleta. The Airport is generally located south of Hollister Avenue and Highway 101, between Los Carneros Road and Fairview Avenue. It lies within the California Coastal Zone and developments within the area are guided by Coastal Commission policies, the local coastal plan, and city zoning guidance. The existing airport is located in and adjacent to 406 acres of City-owned land that became the Ecological Reserve in 1988. The City also established a Goleta Slough Reserve Zone (Reserve Zone) in its Local Coastal Plan (LCP), which includes a comprehensive set of requirements aimed at protecting the Reserve Zone for future generations and conserving its environmentally sensitive resources (LCP Chapter 29.25). CDFW-22

On the Ecological Reserve portion of the Project area, City activities are also governed by the existing Title 14 protections and restrictions within the Ecological Reserve, and the existing Agreement between the Department and the City.

1. The Airport Master Plan is a guidance document intended to direct development over the next 15-20 years. Projects under the Master Plan could entail: CDFW-23

    - Relocating general aviation facilities and new general aviation improvements
    - Airfield safety improvements
    - Consolidation of automobile parking associated with the Terminal
    - Terminal expansion

2. A key project feature that would directly impact at least 11.2 acres of Ecological Reserve lands and adversely affect the remaining habitats is the Taxiway H Airfield Safety Project (Taxiway H). This proposed Project feature would extend an existing taxiway westward about 2,400 feet and northward about 400 feet, reducing the existing Los Carneros Creek stream buffer and associated wildlife habitat. The Environmentally Superior Alternative contained in the PDEIR would not include Taxiway H and related features, which could substantially lessen impacts to the Ecological Reserve and Reserve Zone.

CDFW-23 (cont'd)

The DEIR is programmatic, and subsequent projects will require specific funding and more specific Project-level review and discretionary approval (PDEIR pg. ES-3).

The existing Airport is located on 948 acres of city-owned land; and interfaces with the Title 14-designated state Ecological Reserve and Marine Conservation Area. The Department has management responsibilities for the 406 acre City-owned portion of the Ecological Reserve, pursuant to conditions outlined in the 1987 Agreement. Most of the project area, including the existing airport and areas where new project features are proposed, lies within the 100-year Federal Emergency Management Agency (FEMA) floodplain (PDEIR Exhibit 4g).

Wildlife with the potential to be impacted by the project include the Federally Endangered southern steelhead (*Oncorhynchus mykiss*) and tidewater goby (*Eucyclogobius newberryi*), the State Endangered Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), the State Fully Protected white-tailed kite (*Elanus caeruleus*), numerous wildlife California Species of Special Concern including burrowing owl (*Athene cunicularia*), and 17 species of California Rare Plant Rank (CRPR) List 1B and locally rare plants.

CDFW-24

COMMENTS AND RECOMMENDATIONS

The Department offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

The Department's Role for Activities Impacting the Ecological Reserve:

The 1987 Agreement and associated Memorandum of Understanding (MOU) identify a 406 acre area (Exhibit B to the Agreement, area mapped and zoned Recreation/Open Space) that became the state-designated Goleta Slough Ecological Reserve, along with a 34 acre area held in fee by the Department. Establishing a permanent, managed preserve for Goleta Slough was initially required by LCP C-1 (see 1987 Agreement); activities are now governed in part by the LCP's Chapter 29.25 Goleta Slough Reserve Zone. LCP 29.25.060 stipulates the City shall enter into a binding agreement with the State Department of Fish and Game (now Fish and Wildlife) to establish the slough as part of an ecological preserve system for the purposes of management, preservation, enhancement and restoration.

Certain features of the proposed Project, if constructed, would place additional development, facilities, and mitigation activities on existing Ecological Reserve lands. In order to remove Title 14 protections, or to access and undertake projects on Ecological Reserve lands, the Department would need to agree to formally modify the Ecological Reserve boundaries by revising the 1987 Agreement; additionally the Department must also provide direct authorization as Ecological Reserve Manager for access to and activities within the Ecological Reserve,

CDFW-25

including any restoration or mitigation-related projects (*See* Cal. Code Regs., tit. 14, §§ 550, subd. (d); 550.5, 630). The PDEIR does not adequately describe the Department's role with regard to the existing Ecological Reserve and Marine Conservation Area. CDFW-25 (cont'd)

The Department considers any decision on our part to alter the boundaries or alter the habitat values within the designated Ecological Reserve to be a discretionary decision and subject to appropriate CEQA review and public disclosure. The Executive Summary on page 3 and other sections of the PDEIR need to correctly describe the Department's role as manager of the State-designated Ecological Reserve and Marine Conservation Area, and additionally its Responsible Agency role under CEQA in any amendment of the 1987 Agreement to alter the boundaries of the Ecological Reserve. Although any amendment to the 1987 Agreement would be handled by the South Coast Regional Office of the Department, including sign off of amended documents by the Regional Manager, the approval process will also include notification to the California Fish and Game Commission to give it the opportunity comment on the amendment, removal of protected lands, and any necessary changes to Title 14.

Land use mitigation measure LU/mm-3 addresses Impact LU-4 which identifies that recommended projects such as Taxiway H could result in inconsistencies with the LCP related to Goleta Slough. LU/mm-3 stipulates that the City and the Department "shall amend" the 1987 Agreement to adjust boundaries to: 1) exclude the 11.2 acre Taxiway H project site from the Ecological Reserve; and 2) include a 1:1 acre land trade for other City property in the slough. This mitigation measure is problematic in that the Department's decision to remove Title 14 protections, alter the Agreement, change habitat conditions, or swap lands, is discretionary. There is no guarantee that the Department and the City can reach a mutually-agreed upon amendment and land swap. Additionally, the Department does not control the actions of the Fish and Game Commission, which may also have some discretionary role in any decision to modify the Agreement. CDFW-26

For those reasons, LU/mm3 may be an infeasible mitigation measure and the Department recommends the City consider the Environmentally Superior Alternative which would substantially reduce potential impacts to biological resources and slough hydrology.

The Department's Responsible Agency Role for Streambed Alterations:

Specific projects tiered to the PDEIR may require direct authorization by the Department under the Lake or Streambed Alteration (LSA) Program. That permitting will need to be coordinated with the Department's land management program which has direct responsibility for the Ecological Reserve. In this regard, the Department would be acting as a Responsible Agency under CEQA. CDFW-27

PDEIR Exhibit 4C depicts State jurisdiction relative to jurisdictional wetlands, waters of the state, and the Department streambed and riparian locations. This figure uses various colors of blue and is difficult to read. We know that the current drought cycle has reduced rainfall and has stressed wetlands and transitional wetland areas. The Department does not support the loss of areas capable of supporting wetlands without full consideration of the effect of drought on indicator species, soils and hydrology. This figure shows numerous areas including the potential Taxiway H area and infield areas as potentially supporting state wetlands, meaning wetlands meeting at least one of three criteria under state wetland policy (Cowardin, et. al. 1979). CDFW-28

The Department recommends the City notify us under the LSA Program of any project that could affect areas depicted as potential wetlands, Waters of the State, as well as streambeds and riparian areas (Exhibit 4C). This figure may not accurately capture potential wetland areas, since, for example, we have already noted that the south half of possible Mitigation Area 4 has been documented as dominated by a native facultative wetland grass (*Hordeum brachyantherum*) (Lichvar, 2013; Rincon, 2015). The salt marsh is hydrologically interconnected with stream channels and subsurface water tables and therefore included in our jurisdiction. The Department will determine our final jurisdiction once we have received notification under the LSA Program. CDFW-29

Consistency with Existing Zoning and Management Plans:

The existing LCP requirements and procedures governing development within the Reserve Zone are described in Chapter 29.25. This establishes that generally, the environmentally sensitive habitat areas of the Goleta Slough are to be protected, preserved, and maintained for future generations; where there are conflicts with various provisions of this chapter, the more restrictive laws or regulations are to apply (LCP 29.25.010). The more restrictive regulations favor the environmentally sensitive habitats of Goleta Slough. The intent of establishing the Reserve Zone is to ensure that any development in or adjacent to any "wet area" is designed to preserve the wetland as it exists or improve habitat values of the Reserve Zone (LCP 29.25.010). Other LCP requirements speak to coastal development permit requirements, which include establishing buffers around environmentally sensitive areas and/or including habitat areas supporting rare, threatened, endangered species, fully protected species, species of special concern, and plants designated as rare by the California Native Plant Society (now called the California Rare Plant Rank, which is a Department designation). CDFW-30

Permitted uses under this zoning are specifically identified in LCP 29.25.030 and are limited to restoration projects, nature study, maintenance and water-related activities, and incidental public services related to maintaining existing services. The LCP also requires written comments on proposed coastal development permits from the State of California Department of Fish and Game (now Fish and Wildlife); review is to be coordinated through the City of Santa Barbara Community Development Department Staff (LCP 29.25.020(C)(4). Projects must be found consistent with the City's Coastal Land Use Plan, California Coastal Act policies, and be uses dependent upon the environmentally sensitive area or is otherwise consistent with Section 30233 of the Coastal Act (LCP 29.25.050(A-D).

The PDEIR defers evaluating Land Use impacts to the project-specific level, and defers detailed analysis of consistency with existing plans despite the fact that projects must be consistent with the existing LCP and related policies under current zoning. LU/mm- 1 describes conducting this analysis during the Coastal Development Permit and/or Local Coastal Plan amendment review process; impacts LU-4 and LU-6 describe that projects such as Taxiway H could result in inconsistencies with the policies related to the slough.

Impacts LU-4 and LU-6 are addressed by developing a subsequent project-specific impact analysis for the Taxiway H component (LU/mm-1). LU/mm-2 requires a consistency determination be conducted relative to the "Slough Management Plan"; whether this plan refers to the *Goleta Slough Area Sea Level Rise and Management Plan* (Goleta Slough Management Plan) prepared by the Goleta Slough Management Committee (ESA, 2015) is not clear. The Goleta Slough Management Plan was developed by a stakeholder advisory group, and does not CDFW-31

constitute the management plan for the Department's Ecological Reserve, required by LCP condition 29.25.060. Additionally, the 1987 Agreement states the Department is the entity responsible for the maintenance and management of the Ecological Reserve. The Department has specific requirements for preparing management plans for Title 14-designated Ecological Reserves and direct authority to manage and implement actions on the ground. The management plan envisioned under LCP condition 29.25.060 has yet to be prepared. The Department's existing 1988 management plan for the Ecological Reserve is an important guidance document and should be updated.

CDFW-31 (cont'd)

The Department welcomes input from the Goleta Slough Management Committee and values the informational documents they have prepared, and we periodically participate in committee discussions and work products. However, LU/mm-2 must be modified to indicate the Department is the agency responsible for management of the Ecological Reserve and Marine Conservation Area, and that any project features and/or mitigation measures within those areas may require additional Department approval.

The Department finds that aspects of the proposed Project, and especially Taxiway H, are in conflict with the current LCP. Constructing a new Taxiway H on existing Ecological Reserve with a footprint impact of at least 11.2 acres, would not appear to be an incidental public service (LCP 29.25.030 (B)); does not appear to be a use dependent upon environmentally sensitive resources (LCP 29.25.050 (C)); and, has not been designed to prevent impacts that would degrade environmentally sensitive habitats in our view as Trustee Agency, or as a Responsible Agency for future project approvals within the Department's jurisdiction. (LCP 29.25.050 (D)).

CDFW-32

Aspects of the Airport's Wildlife Hazard Management Plan (WHMP) and general hazing activities may be inconsistent with LCP requirements. For example, mowing beyond 135 feet of airport runways and taxiways would require a Coastal Development Permit (LCP 29.25.040 (2)). The Department is unaware if the Airport has a LCP authorization for ongoing mowing of habitat areas beyond 135 feet parallel to existing runways and taxiways.

Review of LCP consistency with the ongoing WHMP and on-the-ground activities needs to occur. Activities which haze and harass wildlife, reduce habitat values, or remove wildlife from the Reserve Zone and/or Ecological Reserve lead directly to the degradation of the environment and in the Department's view these actions are inconsistent with the LCP requirements under 29.25.050 (D).

CDFW-33

Habitat Values in Vicinity of Proposed Taxiway H:

The land area within the Reserve Zone where proposed Taxiway H would be constructed serves as an existing buffer between Runway 7-25 and Los Carneros Creek. Los Carneros Creek is an environmentally sensitive habitat area known to support tidewater goby, southern steelhead and sensitive birds. The Department's Goleta Slough Ecological Reserve Management Plan specifically identified this area adjacent Los Carneros Creek as a key area for white-tailed kite, a fully protected species (Fong, et al. 1988). The area has been degraded by past airport ground disturbance and maintenance activities. Nonetheless, the area provides important habitat functions within the Ecological Reserve and larger slough, and could be improved with active restoration. Approximately 12.4 acres of total disturbance would occur to construct and maintain Taxiway H, including 11.2 acre of direct construction impacts to the Ecological Reserve; 6.1 acres of new pavement and shoulders would be installed; and 6.3 acres

CDFW-34

CDFW-35

would be maintained as a "taxiway object free area" (PDEIR 4-35). We were unable to locate a description of potential impacts to biological resources from this maintenance.

This general area serves as an existing spatial buffer between the established airport Runway 7-25 and Los Carneros Creek environmentally sensitive habitat area and may support remnant state wetlands (Exhibit 4C). The current "setback" distance of 600 feet would be substantially reduced to 200-250 feet if Taxiway H is constructed, eliminating most of its buffering value, and particularly its value as a spatial noise buffer (see subsequent discussion under Noise). The area also provides some infiltration services which help sustain wetland function within the slough. CDFW-35 (cont'd)

The general area where Taxiway H is proposed serves several other important functions within the slough ecosystem, including: 1) foraging habitat for local declining species of raptors; 2) breeding and foraging habitat for declining passerine birds such as horned lark (*Eremophila alpestris*); 3) the higher elevations in this area of the slough serve as flood refugia for wildlife during high flow events; and 4) the general area is likely to provide future direct coastal habitat values under various sea level rise scenarios, while much of the lower and central slough is projected to convert to unvegetated mud flats by 2100 (ESA, 2015). CDFW-36

Some aspects of the WHMP result in direct adverse impacts to habitats and wildlife within the Reserve Zone and on the Ecological Reserve. Maintenance activities are generally described in Table 4F. The PDEIR concludes that since the airport is hazing raptors north of Runway 7-25, where Taxiway H is proposed, this area is not suitable for raptor foraging (PDEIR pg 4-36). This suggests that we must fully consider this additional cumulative impact associated with ongoing Airport operations relative to areas subject to wildlife hazard reduction and hazing.

The Department was unable to locate an assessment of impacts from the wildlife hazard reduction program and activities relative to new and increased facilities proposed under the Master Plan in the PDEIR, and particularly, Taxiway H. These direct and indirect effects to resident and migratory wildlife within the Reserve Zone must be fully evaluated and fundamentally avoided. As one example, the PDEIR notes that currently the Airport mows wildlife habitat twice a year and extends 135 feet from paved areas (PDEIR pg 4-20). Elsewhere in the document, it describes that the entire Taxiway H project area is mowed (PDEIR pg 4-35). This is a serious discrepancy, as the "entire taxiway H project area" means about 11.2 acres of Ecological Reserve is subjected to mowing. We previously indicated the LCP suggests that "mowing the entire taxiway H area" would require a Coastal Development Permit. CDFW-37

The existing 1988 MOU between the Department and the City identified areas in this location which supported transitional wetland and were not to be mowed. Fong et al. (1988) identified this area as supporting Palustrine Wetlands including Haline Vernal Wetlands (based upon a 1984 map from Santa Barbara Airport EIR, Map 1) and is a key white-tail kite foraging resource. Continued disturbance associated with airport activities can be examined on Google Earth imagery. In 2002, the area appears to have been scraped which would damage soils, perennial wetland vegetation, and likely caused soil compaction. In 2005, the area was used for staging the reconstruction of portions of Los Carneros Creek, which now has roadways on both sides which disrupt habitat connectivity and wildlife use. It now appears the entire area is mowed and it is therefore not surprising the wildlife values have been degraded. Perennial wetland vegetation would be expected to be damaged by biannual mowing. Mowing perennial

herbaceous vegetation favors replacement with annual grasses which are more tolerant of mowing. Removal of vegetation cover via mowing exacerbates soil compaction and reduces infiltration necessary to sustain wetlands. CDFW-37 (cont'd)

If the Taxiway H project would require new or intensified hazing or habitat modification activities on the Ecological Reserve, or Reserve Zone, these specific impacts must be fully disclosed and evaluated in the PDEIR. Direct and indirect impacts to habitats and biological resources should be fully mitigated and should meet the LCP requirements that development in areas adjacent to an environmentally sensitive habitat area shall be designed to prevent impacts which would significantly degrade such areas and shall be compatible with the continuance of such habitat (LCP 29.25.050 (D)). Ongoing and new hazing impacts are likely to occur, are not analyzed in the PDEIR, and some activities are inconsistent with aspects of the LCP in the Department's opinion. CDFW-38

The habitat values and functions in the Taxiway H project area should be viewed as environmentally sensitive habitats in the Coastal Zone and provided the necessary protections to maintain and protect the slough for future generations while balancing airport needs. The habitat values in this spatial location of the slough which would be converted to a taxiway are critically important and warrant continued protection under Title 14 as part of the Ecological Reserve. The Department both as Responsible Agency under CEQA and the agency tasked with management of the Ecological Reserve must weigh these values when we consider proposals to exclude the Taxiway H area from the Ecological Reserve and replace it with land elsewhere (see LU/mm-3). In order to properly do that, the impacts discussed above must be fully disclosed and evaluated in the PDEIR. CDFW-39

Proposed Wetland Mitigation Areas:

The PDEIR discusses impacts to potential state and federal wetlands should the taxiway be extended westward. The PDEIR includes a general set of mitigation concepts that would be further developed in a subsequent plan, the Programmatic Wetland Restoration Plan (PWRP). Four areas are identified within the Goleta Slough where wetland mitigation could potentially be undertaken, generally at a 2:1 ratio. The four areas are shown on maps in Exhibit 4D and described in Table 4G.

Department review indicates that Areas 1 (3.5 acres) and 2 (2.2 acres) are fully contained within the existing Ecological Reserve on airport property and are protected by Title 14. Any mitigation or restoration activity in this location will need to be authorized by the Department as the agency responsible for management of the Ecological Reserve (and as a Responsible Agency under CEQA in its approval of those activities). Table 4G describes Area 1 as being half on the Ecological Reserve and located on the Department property also known as Western Goleta Slough (PDEIR pg 4-41-42). This description appears incorrect, based upon the mapped location on Exhibit 4D. The Department again notes that Area 2 supports a population of the rare annual southern tarplant (*Centromadia parryi australis*), a California Rare Plant Rank 1b declining plant which requires protection and is an environmentally sensitive resource. CDFW-40

Area 4 (14.7 acres) adjoins the western edge of the existing southern runway. Department maps indicate southern part of Area 4 is already within the boundaries of the Ecological Reserve; habitat maps show this area is primarily vegetated with meadow barley, a native

facultative wetland species (Rincon, 2015). The Department would not support converting habitats in Area 4 to other habitat types for mitigation.

Area 3 is the only location currently fully outside the existing Ecological Reserve boundary. Creation of wetlands at this location would potentially affect existing native grasslands that occupy portions of the area (Rincon, 2015) and the resident wildlife attempting to reside there. We note that Belding savanna sparrow activity has been documented in the adjoining marsh near Area 3 (Fong et al. 1988); this area likely supports foraging resources and intensive restoration activity in this location could disrupt Belding savanna sparrow's resident, year-round activity, including foraging.

The PDEIR indicates the four mitigation areas would provide an opportunity for almost 30 acres of new wetlands (PDEIR pg 4-41). BIO/mm-1 Component 2 describes that wetland mitigation should occur on airport property within the slough on uplands currently mapped as disturbed or dominated by non-native species. Where such areas are upland or transitional habitats, the Department generally does not support lowering elevations, removing soil, recontouring, or type conversion to other habitats, including emergent wetland. Current sea level rise projections suggest that sediment accretion would be helpful within the slough but currently, sedimentation processes are impaired and most sediment is removed from the system. CDFW-40 (cont'd)

The PDEIR indicates that for mitigation, only certain vegetation types be restored within the Ecological Reserve (BIO/mm-1(4)). Restoration goals for the state Ecological Reserve should be based upon the physical habitat conditions, soils, salinity and hydrology and restoration objectives must be approved by the Department.
Previous airfield safety projects were required to mitigate seasonal wetland impacts at a 4:1 ratio for area, under existing LCP Policy C-11, which is twice the area proposed under BIO/mm-1; this suggests more area may be needed to meet regulatory mitigation requirements. The Department therefore concludes that it is uncertain whether it is feasible to mitigate additional losses of wetlands, transitional wetlands, and upland resources in the existing Goleta Slough on airport-owned property.

Proposed Ecological Reserve Land Swap Areas:

The PDEIR identifies the potential to lose 11.2 acres of existing Ecological Reserve in order to construct an extended Taxiway H. LU/mm-3 would require a 1:1 land exchange where protected Ecological Reserve land would be removed, to be replaced with other Airport property (PDEIR ES-15). As a Responsible Agency under CEQA with discretionary approval of any land trades, the Department would need to carefully evaluate potential exchange lands and we would require specifics on the land swap details before such a trade could be evaluated, including information on any potential environmental impacts from the swap. The PDEIR and associated documents do not provide sufficient background for the Department as Responsible Agency to make that determination. CDFW-41

Noise and Vibration Impacts to Wildlife:

The PDEIR describes activities the Department finds would increase sources of noise and vibration, which would be expected to adversely affect onsite wildlife in the Ecological Reserve, Marine Conservation Area and in other nearby wildlife habitat areas in and around the slough. The PDEIR has not quantified or analyzed the adverse effects to resident and migratory wildlife CDFW-42

from: a) new sources of noise and vibration in new areas; and b) increases in enplanements/air traffic over time, which would increase the frequency and duration of noise and vibration events. The noise analysis in PDEIR is included in a section under Land Use, does not quantify the impacts of noise and vibrations on fish and wildlife species, and does not treat fish and wildlife as a sensitive receptor.

A growing body of literature indicates that noise is an intense, widespread pollutant adversely affecting wildlife in a variety of ways. There are many hidden costs of noise exposure in wildlife, including compromising predator/prey detection, mating signals, altering temporal and/or movement patterns, and increasing physiological stress (Francis and Barbor 2013). Noise impacts on terrestrial animals can take many forms, including changing habitat use and activity patterns, increasing stress response, decreasing immune response, reducing reproductive success, increasing predation risk, degrading conspecific communication, and damaging hearing if the sound is sufficiently loud (Pater et al. 2009). Chronic and frequent noise interferes with animals' abilities to detect important sounds, whereas intermittent and unpredictable noise is often perceived as a threat (Kight and Swaddle 2011). Most importantly, these effects can lead to fitness costs, directly or indirectly affecting survival and reproductive success (Francis and Barbor 2013).

Freshwater fish and aquatic invertebrates also experience noise and vibration impacts. Water fundamentally amplifies and carries sound long distances. Sound travels faster and is much less attenuated in water than in air, making it the perfect means for communication over long distances (Amoser and Ladich, 2005). Noise is an omnipresent environmental constraint on the auditory system of fish and ultimately determines the detectability of sounds relevant to their orientation toward prey, predators, and conspecifics, and to acoustic communication in their environment; sounds from different sources provide fishes with information relevant for survival, e.g., finding mates and prey or avoiding predators (Wysock and Ladich, 2005). Loud noises and vibrations can "mask" natural sounds necessary for fish, invertebrates, and other types of wildlife to respond to environmental conditions and represents an adverse impact.

CDFW-42 (cont'd)

Wildlife vary in the sound frequencies they are capable of hearing, some types of wildlife can hear differing sound frequencies than humans, and their responses also vary and do not equate to human hearing (FHWA 2011). For example, the following ranges have been reported by FWHA (2011) for various categories of wildlife:

Mammals:	10 Hz to 150 kHz; sensitivity to -20 dB
Birds:	100 Hz to 8-10 kHz; sensitivity at 0-10 dB
Reptiles:	50 Hz to 2 kHz; sensitivity at 40-50 dB
Amphibians:	100 Hz to 2 kHz; sensitivity from 10-60 dB

Actual hearing damage to individual animal's hearing structures can occur from loud noises and vibration as well. The responses of some wildlife species to abnormal noise levels are severe and can include impaired hearing and stress (Bureau of Land Management, 1981). Stebbins (1974) reported that some reptiles suffer hearing loss at sound levels of 60 dB, which is well below the range of noise levels that would be expected from jets operating on a new taxiway. Birds, like humans, experience damage to the auditory receptors (hair cells) from loud noises. The sound intensity that produces damage and the amount of damage produced differs depending on the species. Although some if not all species of birds have the ability to repair damaged hair cells, continued exposure to loud noises would prevent recovery of their hearing

(Beason, 2004). The new Taxiway H project would introduce new very loud and frequent noise events close to Los Carneros Creek. CDFW-42 (cont'd)

The PDEIR identifies existing noise levels from 2011 using a Community Noise Equivalent Level (CNEL) Noise Contour depicted on Figure 4J. Figure 4J shows existing CNEL in the active airport area is 75 CNEL and then it goes down as one moves away from the noise source. The Ecological Reserve north of Runway 7-25 experiences from 75-65 CNEL and 70-60 CNEL at the Marine Conservation Area under existing conditions. CDFW-43

We located projected changes in CNEL on two figures in the Initial Study, one for 2017 and one for 2032: both show reductions in the extent of noise, rather than increases that are likely to occur with a new Taxiway H feature and increased airport use. The small reduction in spatial area experiencing 75 CNEL-noise levels projected for 2017 and 2032 occurs because of requirements that airplane noise levels be reduced.

No information is depicted showing how noise and vibration would change if Taxiway H, for instance, were constructed and operated, or how noise and vibration would change over time cumulatively, as increased airport facilities are likely to have a growth-inducing effect. Taxiway H, for example, would largely be located on the existing Ecological Reserve introducing new noise and vibration impacts close to Los Carneros Creek. Currently the existing runway is about 600 feet south of this stream, but if Taxiway H is constructed it would be about 200-250 feet from sensitive riparian and aquatic resources. The Department considers the loss of at least 12 acres currently buffering Los Carneros Creek from the existing airport's noise and vibration to be a significant adverse impact to fish and wildlife and is likely a Class I impact. This buffer function cannot be replaced at offsite locations through a land trade or revegetation effort.

The LCP minimum buffer requirements of 100 feet around wetlands within the Reserve Zone will not adequately buffer new noise, vibrations, lighting, and other potential indirect impacts from a new Taxiway H feature (LCP 29.25.020(C)(1)(f). Exhibit 4J shows that north of the existing runways, existing CNEL levels only decline by 5 CNEL over the 600 foot swath of habitat before encountering Los Carneros Creek and endangered fish populations. A 100 foot buffer would clearly not be sufficient to neutralize adverse fragmentation effects from noise and vibration when we consider the data presented in Exhibit 4J. CDFW-44

Taxiway H would also introduce new sources of noise and vibration even closer to the Los Carneros Creek than the existing runway 7-25, which constitutes another significant adverse impact directly related to new airport facilities under the proposed Master Plan. The taxiway is depicted in Exhibit 2D and would be closer to Los Carneros Creek than it would be to the existing runway 7-25, introducing new frequent episodes of loud noise from aircraft including jets. The taxiway is likely to be used for private and corporate jets rather than commercial jets and their sound levels differ. A quantified analysis of noise and vibration levels relative to affected fish and wildlife resources is not included in the PDEIR and should specifically be included to address the sound levels and sound frequencies likely to occur from the various types of aircraft that would operate on the proposed taxiway. Other project features which, if constructed and operated, could increase noise and vibration adjacent to fish and wildlife populations, the Ecological Reserve, and Marine Conservation Area, must also be analyzed.

The PDEIR mentions that indirect effects from "noise" could occur during construction relative to impacting the state endangered Belding's savanna sparrow and breeding birds in Los Carneros Creek (PDEIR pg 4-37). The PDEIR concludes this is a Class II impact that can be avoided by limiting construction to outside the nesting season or using appropriate buffers (Mitigation Measure BIO/mm-3); and by monitoring noise levels during construction in Belding's habitat to determine if a significant disruption in foraging occurs (BIO/MM-4). The Department is concerned construction and Airport activities will disrupt foraging activity of the state-listed Belding savanna sparrow, a non-migratory year round resident of Goleta Slough; the species should continue to enjoy the Ecological Reserve protections and land use protections it is supposed to receive within this geographic area (see LCP Chapter 29.25.010). CDFW-45

The PDEIR analysis only addresses construction noise impacts and does not address noise and vibration impacts from ongoing operations of a Taxiway H feature and other project components that may be located near streams and environmentally sensitive wildlife habitats. Some of the highest levels of noise associated with human activity are the noise and vibration from jet aircraft. For example, one jet engine taking off is reported as 140 dB, an airplane taking off is reported as 140 dB, and one jet engine on a ramp is reported as 120 dB (Center for Hearing and Communications website, 2016).

The PDEIR depicts existing noise levels using Community Noise Equivalent Levels (CNEL) on Exhibit 4J. The depicted values therefore represent noise levels averaged over a 24 hour period with adjustments for human hearing and sensitivities, not wildlife. It is likely a dB(A) scale (adjusted for human hearing), was used to measure existing noise levels. By using averaged values, individual short duration high noise events tied to taxi-ing, landings and takeoffs aren't evaluated for adverse noise effects to fish and wildlife. CDFW-46

The PDEIR notes the existing Santa Barbara General Plan requires that planning for airport development should be guided by the following basic principles and states "(N)oise, air pollution, and all other adverse environmental and ecological impacts must be reduced and held at absolute minimum levels" (PDEIR pg 4-47). This requirement has yet to be achieved in the Department's view. Class I level impacts from noise and vibration to wildlife are foreseeable and likely; to avoid these adverse effects, the Department again recommends that the Taxiway H component be relocated off the Ecological Reserve, substantially reduced in extent, or eliminated from the Master Plan projects. CDFW-47

The Department recommends the City evaluate specific noise impacts to wildlife species utilizing substantial data and scientific information. The analysis should not be weighted based upon human hearing when analyzing potential effects on wildlife. Loss of a least 400 feet of northern buffer if Taxiway H is constructed and operating constitutes a significant adverse impact to wildlife in the Reserve Zone and on the Ecological Reserve in the Department's opinion as Responsible Agency. Feasible alternatives and mitigation to avoid substantial noise and vibration impacts at the Ecological Reserve and general Reserve Zone have not been fully explored in the Department's opinion. Mitigating Impacts to the northern buffer on the existing Ecological Reserve for the Taxiway project feature may not be feasible or possible, which leads the Department to the conclusion that Class I impacts to environmentally sensitive habitats and species are likely to occur. CDFW-48

Cumulative Impacts and Losses of Raptor Foraging:

The Department's previous comments identified loss of raptor foraging habitats in the general Goleta Slough area as a potentially significant impact at the project level and cumulatively. This impact has not been adequately addressed in the PDEIR. Impact BIO-1 identifies loss of jurisdictional wetlands and BIO/mm-1 speaks primarily to developing Wetland Restoration Plans; upland habitat shall be mitigated at 1:1 for area (restoration to impact). Mitigating at this level would result in a 50% loss of upland habitat resources and raptor foraging. Upland areas including native and non-native grasslands, ruderal areas and open mixed habitat types are known to support raptor foraging resources. Coastal wetlands also support raptor foraging resources including small mammal populations.

The Department recently examined other projects in the City of Goleta which are under construction or proposed, and they would remove approximately 265 acres of open space that could be used by raptors for foraging. These losses are significant and constitute a significant cumulative impact, as defined in CEQA Guidelines sections 15065 (a)(3) and 15355. The Department is concerned the cumulative effects on raptor species are considerable, as defined in CEQA Guidelines sections 15065 (a)(3) and 15355, and that the Project's incremental effect on raptor foraging habitat may be "cumulatively considerable". Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and the effects of probable future projects.

The Goleta Valley was documented in 1961 as supporting 10,600 acres of rangelands and 6,700 acres of agricultural lands, both of which support foraging resources for fully protected white tailed kite and other raptors (Fong et. al. 1988). Most of this is now gone. Extensive conversion of open space has also occurred in the Goleta Valley within the campus of the University of California, Santa Barbara; but the Department has no recent estimate of losses there. We know that numerous new areas around the University will be developed under the University's Long Range Plan; currently apartment housing is being constructed at Los Carneros Road and Mesa Drive abutting the Department's 12 acre western Goleta Slough Ecological Reserve unit, eliminating raptor foraging and diminishing adjacent habitat values. The North Campus Open Space project to restore Devereux Slough, just west of Goleta Slough, will remove raptor foraging areas that currently exists and we expect it will require a number of years to recover the small mammal resources in the restored habitat areas, further stressing local raptor populations. CDFW-49

The PDEIR also identifies numerous past City projects at the Airport which have impacted resources within the slough, Ecological Reserve, and/ or resulted in mitigation activities there (PDEIR 4-14). Some past projects have removed raptor foraging areas from the Ecological Reserve, and mitigation activities have led to conversion of upland areas to wetlands to meet regulatory mitigation requirements.

The Department as Trustee and Responsible Agency must fully consider the cumulative effects of past removals of Title 14 protected habitats and related developments in the larger slough. In the Department's view, we cannot continue to remove upland and/or transitional habitats given sea level rise projections, nor can we continue to convert them to wetlands when we consider that this is a cumulatively significant adverse impact to other environmentally sensitive resources.

The cumulative effects of development projects on white-tailed kite populations in the City have resulted in what has been described as a "trajectory of decline" (Mark Holmgren, pers. comm.). The symptoms of the progressive decline in the local population of white-tailed kite include the loss of ample foraging areas and loss of connections among open space areas which allow free immigration, emigration, and dispersal (Mark Holmgren, pers. comm.). When raptor foraging habitats are removed, birds must fundamentally travel longer distances to obtain food for them and their young, which has a direct energy cost that reduces fitness and reproductive output. At some point, even if a nest site is still useable, lack of nearby foraging resources will lead to local extirpation in the general area. This is an unacceptable outcome for a fully protected species reliant upon coastal zone resources, in the Department's opinion.

It should be noted that the current drought, which may continue into the future given climate change projections, has severely stressed interior populations of small mammals which are key components of the food chain, affecting the food source for numerous raptors and other wildlife species. Ongoing drought has increased the value of coastal habitats such as Goleta Slough and nearby areas, which still experience cooler temperatures, receive some moisture from fog, and are somewhat more drought resilient. As interior wetlands decline, coastal wetlands become even more important in droughts, particularly for migratory birds.

The PDEIR does not adequately identify this potential impact; adequate mitigation for loss of upland and raptor foraging habitat is not provided, in part due to the view that these species have been hazed and therefore cannot utilize areas like where Taxiway H is proposed.

CDFW-49 (cont'd)

Should project components impose impacts on the Ecological Reserve, the Department has direct approval authority under Title 14 for any activity affecting the protected resources. BIO/mm-1 should be modified to indicate that the Department has final approval over wetland and upland mitigation on the Ecological Reserve. The Goleta Slough Management Committee does not have any approval authority, but the Department welcomes input and analysis from the Committee to assist in making these discretionary decisions.

BIO/mm-1 should provide for compensatory habitat mitigation to offset cumulative losses of upland foraging habitat at a greater ratio than 1:1 and this may require acquiring and permanently protecting foraging resources outside the Reserve Zone. Cumulative loss of raptor foraging areas and airport modifications to habitat areas that reduce foraging resources are significant in Goleta Slough and are likely Class I impacts.

CDFW-50

Alternatives:

The Department as a potential Responsible Agency for future project-related approvals and Trustee for State wildlife resources has reviewed the alternatives to the proposed Master Plan. We agree that the Environmentally Superior Alternative would substantially reduce adverse impacts to Goleta Slough by eliminating the Taxiway H project feature and related projects. This would reduce environmental impacts to Goleta Slough and avoid inconsistencies with the City of Santa Barbara's General Plan land use designation, the Airport's LCP, and Reserve Zone zoning (PDEIR pg. 6-6). Other differences in impacts between the project as proposed and the Environmentally Superior Alternative are a reduction in impacts related to construction, indirect impacts to Goleta Slough, and a reduction in additional impervious surfaces (PDEIR pg. 6-6).

CDFW-51

This alternative would not address key safety issues as described in the PDEIR. Given that removal of Ecological Reserve represents a major adverse impact within a designated ecologically sensitive coastal area which will lead to Class I impacts in the Department's opinion, we recommend the Airport more fully evaluate other means to improve safety. The PDEIR notes that an FAA Advisory Circular mentions that runway crossings be limited to reduce human error; such a design creates benefits including reducing the workload of air traffic controllers (PDEIR pg. 6-6). CDFW-51 (cont'd)

This suggests to the Department that increased air traffic controllers and better on the-ground management could be explored and may provide feasible ways to improve safety without impacting Goleta Slough. We encourage the City of Santa Barbara to explore other means to improve safety that are protective of Goleta Slough; selection of the Environmentally Superior Alternative would better achieve this important goal and appears to be more consistent with the LCP Reserve Zone Chapter 29.25 and the existing Ecological Reserve Title 14 regulations.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/ CNDDB_ FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_ animals.asp. CDFW-52

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by the Department. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) CDFW-53

CONCLUSION

The Department appreciates the opportunity to comment on this recirculated PDEIR to assist the City of Santa Barbara in identifying and mitigating Project impacts on biological resources.

We encourage the City of Santa Barbara to explore other means to improve safety that are protective of Goleta Slough; selection of the Environmentally Superior Alternative would better achieve this important goal and appears to be more consistent with the LCP Reserve Zone Chapter 29.25 and existing Ecological Reserve regulations. CDFW-54

Due to the issues presented in this letter, the Department concludes that the recirculated PDEIR and associated record do not adequately identify or mitigate the Project's significant, or

potentially significant, impacts on biological resources. As a Responsible Agency, the Department may consider the option provided in CEQA Guidelines section 15042. In addition, because of these issues, it is unlikely that the City of Santa Barbara has the basis to approve the project or make "findings" as required by CEQA unless the environmental document is modified to eliminate and/or mitigate significant impacts, as reasonably feasible (CEQA Guidelines, §§ 15074, 15091 & 15092), notwithstanding a statement of overriding considerations.

CDFW-54 (cont'd)

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Ms. Mary Meyer, Senior Environmental Scientist (Specialist) at (805) 640-8019 or Mary.Meyer@Wildlife.ca.gov.

Sincerely,

for

Edmund Pert
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Response to Recirculated Draft Program EIR - Letter 9
California Department of Fish and Wildlife (CDFW)
Dated September 12, 2016

*CDFW-1 through CDFW-18 are included in **Appendix A** of this Final Program EIR.*

CDFW-19: This comment states that the CDFW provided previous comments (dated October 29, 2015) on the Draft Program EIR and that this letter is intended to supplement that letter.

Response: Comment noted.

CDFW-20: This comment provides information on the CDFW's role as a State Trustee Agency for fish and wildlife resources.

Response: Comment noted.

CDFW-21: This comment states the CDFW is also submitting comments as a Responsible Agency under the *California Environmental Quality Act* (CEQA) due to its regulatory authority related to the project, the Department's role as manager of Title 14-administered lands (i.e., the Goleta Slough Ecological Reserve, GSER), and manager of the Goleta Slough Marine Conservation Area, which overlaps part of the GSER.

Response: Comment noted. No CDFW approvals are necessary for adoption of the proposed Airport Master Plan. The Program EIR recognizes that some future recommended implementing projects (e.g., Taxiway H Airfield Safety Project) would be subject to CFDW regulations.

CDFW-22: This comment provides background on the establishment of the GSER.

Response: Comment noted.

CDFW-23: This comment summarizes future projects identified in the proposed Airport Master Plan and specifically calls out the Taxiway H Airfield Safety Project. It also identifies the Environmentally Superior alternative as the Airport Master Plan without the Taxiway H project.

Response: Comment noted. However, the characterization of the Taxiway H Airfield Safety Project is not entirely accurate. The existing taxiway would be extended approximately 2,350

feet westerly from the edge of the existing apron pavement. The northerly edge of taxiway shoulder pavement would be approximately 358 feet north of the northerly edge of the existing runway shoulder. A permanent loss of approximately 6.1 acres of existing habitat would occur due to the installation of pavement for the taxiway and taxiway shoulders. The remainder the disturbance area would be graded to Federal Aviation Administration (FAA) taxiway safety standards, but could then be allowed to revegetate with vegetation similar to what is currently present (i.e., brome grass). The Final Program EIR (Section 2.2.1) has been revised to clarify this point.

CDFW-24: This comment states the Draft EIR on the proposed Airport Master Plan is programmatic, and that subsequent projects will require specific funding and more specific project-level reviews and discretionary approvals. This comment also summarizes potential environmental conditions related to the project, including the presence of a 100-year floodplain and protected wildlife and plants.

Response: Comment noted. Most, if not all, of the sensitive wildlife and plants that this comment mentions would not be directly impacted by any of the proposed Airport Master Plan projects. If impacts such as degradation of water quality due to flooding were to occur, indirect impacts could result. However, the Airport currently has in place numerous measures and procedures to minimize its effects on the Slough and tributary creeks and associated sensitive flora and fauna. It operates under permit conditions of the State Water Resources Board and prepares routine monitoring reports, as required. As a result, water quality impacts related to implementation of the proposed Master Plan are considered to be less than significant (Final Program EIR, Section 4.5.4).

CDFW-25: This comment reiterates the Department's various roles associated with the GSER and states that the Recirculated Draft Program EIR does not adequately describe the Department's role with regard to the GSER and Marine Conservation Area.

Response: Comment noted. The Final Program EIR has been revised to include additional information regarding CDFW's various roles (see Section 2.5).

CDFW-26: This comment states that LU/mm-3 of the Program EIR, which requires that the City of Santa Barbara and CDFW amend their Cooperative Agreement for the GSER, is a future discretionary approval for the Taxiway H Airfield Safety Project that cannot be guaranteed and is, therefore, not a feasible mitigation measure.

Response: The LU/mm-3 wording has been clarified to provide that a process shall be pursued in cooperation with the California Department of Fish and Wildlife toward amending the 1987 GSER Cooperative Agreement to accommodate the Taxiway H Airfield Safety Project and establish its consistency with the Agreement. The Final Program EIR recognizes that future approvals of

amendments to the Agreement and other planning documents is necessary to establish policy consistency for the Taxiway H Airfield Safety Project. This project would not proceed without these amendments. Thus, the identified measures constitute full mitigation of the potential inconsistency impacts.

CDFW-27: This comment states that specific projects tiered to the Program EIR may require direct authorization from CDFW under the Lake or Streambed Alteration (LSA) Program, another reason that the Department may be a Responsible Agency.

Response: Comment noted. The Final Program EIR text has been clarified to identify CDFW roles and responsibilities (Section 2.5).

CDFW-28: This comment states that Exhibit 4C of the Program EIR, which shows State jurisdiction relative to wetlands, waters of the State, and streambed and riparian locations, is hard to read. This comment also states that the current drought cycle has affected indicator species, soils, and hydrology.

Response: Comment noted. Although the Program EIR and analysis of the overall Master Plan is based on 2012 surveys, which occurred before the full extent of the recent drought cycle, additional site-specific surveys will be required for any future individual projects potentially affecting sensitive biological resources as part of project-specific environmental review. Exhibit 4C uses previously published maps and, therefore, did not attempt to provide a different color scheme.

CDFW-29: This comment states that CDFW recommends that the City notify them under the LSA Program of any project that could affect areas depicted as potential wetlands, waters of the State, or streambeds and riparian areas.

Response: Comment noted. The City will notify the CDFW of any project that is subject to the LSA Program.

CDFW-30: This comment summarizes existing Local Coastal Plan (LCP) requirements and procedures relative to the Goleta Slough Reserve (G-S-R) zone and Airport LCP as well as the discussion contained in the Program EIR relative to future potential projects within the G-S-R zone.

Response: Comment noted. The Final Program EIR recognizes LCP requirements and procedures for future individual projects located within the Coastal Zone and refers to subsequent coastal development permit processes.

CDFW-31: This comment states that the Program EIR defers evaluating land use impacts (i.e., of the Taxiway H Airfield Safety Project) per LU/mm-1. It also states that the Program EIR (LU/mm-2) requires that future potential projects provide a consistency determination with the *Goleta Slough Area Sea Level Rise and Management Plan* (Slough Management Plan), but that this does not constitute the management plan for the Department's Ecological Reserve, required by LCP condition 29.25.060. In fact, a management plan as envisioned by the LCP has never been prepared. This comment also states that the CDFW's existing 1988 management plan for the Ecological Reserve should be updated. The comment then goes on to state that LU/mm-2 must be modified to state that any project features and/or mitigation measures within the GSER or Marine Conservation Area may require additional CDFW approval.

Response: This EIR is a Program EIR on a planning document (i.e., the proposed Airport Master Plan) and identifies overall land use impacts on a programmatic level. More detailed project-specific environmental and policy analysis and the development of a more detailed mitigation program for the Taxiway H Airfield Safety Project would be provided as part of the subsequent project permit process based on more detailed project design. Associated analysis of consistency with the G-S-R zone and the policies of the Airport's LCP would be conducted as part of the Coastal Development Permit and LCP amendment/General Plan amendment/rezone process. These future discretionary actions have been included in the Program EIR as LU/mm-1 to allow their occurrence to be part of the Program EIR's mitigation, monitoring, and reporting program.

LU/mm-2 addresses the Goleta Slough Management Committee (GSMC) and its role as an advisory committee for the Goleta Slough. CDFW approval of future Airport Master Plan projects within the GSER is covered by BIO/mm-1, which identifies CDFW as a reviewing agency of any project-specific Habitat Mitigation and Monitoring Plans (HMMPs) related to potential impacts to the Goleta Slough. In addition, LU/mm-3 addresses the Memorandum of Agreement between CDFW and the City of Santa Barbara with respect to the GSER boundaries (see Response to Comment CDFW-26).

CDFW-32: This comment states aspects of the Taxiway H Airfield Safety Project are in conflict with the current LCP. It also states that the Taxiway H project has a project footprint impact of at least 11.2 acres and that the project is not an incidental public service, dependent upon environmentally sensitive resources, or designed to prevent impacts that would degrade environmentally sensitive resources.

Response: The Program EIR recognizes that the Taxiway H Airfield Safety Project would need to amend the current LCP before it could be approved. This comment is inaccurate in stating the Taxiway H project has a project footprint of at least 11.2 acres. See Response to Comment CDFW-23. The existing taxiway would result in the permanent loss of approximately 6.1 acres of existing habitat due to the installation of pavement for the taxiway and taxiway shoulders. The remainder of the disturbance area would be graded to FAA taxiway safety standards, but could then be allowed to revegetate with vegetation similar to what is currently present (i.e., brome grass). At

this time, it is premature to determine the Taxiway H project's consistency with LCP 29.25.050 as the project has not yet been designed.

CDFW-33: This comment states that the Airport's draft Wildlife Hazard Management Plan and general hazing activities may be inconsistent with LCP requirements.

Response: The Airport's Wildlife Hazard Management Plan (WHMP) is not a part of the proposed Airport Master Plan. It is a document required by Federal law and was approved by FAA on February 27, 2017. Discussion of the WHMP for the Airport in the Program EIR is within the context of Applicable Plans and Policies (Section 4.2.2) related to biological resources. A wildlife hazard management plan is an operational document required by FAA for a Part 139-certificated airport.

CDFW-34: This comment states that the proposed Taxiway H Airfield Safety Project site serves as an existing buffer between Runway 7-25 and Carneros Creek, which is an environmentally sensitive area known to support tidewater goby, southern steelhead, and sensitive birds. It also states that the area is identified by the CDFW's Goleta Slough Ecological Reserve Management Plan (1988) as a key area for white-tailed kite. The comment characterizes the area as degraded by airport ground disturbance and maintenance activities, but states that the area provides important habitat functions and could be improved with active restoration.

Response: The proposed Taxiway H Airfield Safety Project would retain an approximate 200-foot buffer from the riparian area along Carneros Creek, which is an area that provides an additional vegetated barrier between the airfield and the creek itself. This is more than double the distance required by the Airport's LCP (Policy C-4), which requires a 100-foot minimum buffer.

See Topical Response #1 for an analysis of the area's value to white-tailed kites as foraging habitat based on recent surveys. In addition, FAA requires the Airport to carry out maintenance activities per a WHMP for the safety of the Airport's users and passengers (FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports* [2007]). During the past century, wildlife-aircraft strikes have resulted in the loss of hundreds of lives worldwide, as well as billions of dollars in aircraft damage. At public-use airports, the FAA recommends immediately correcting, in cooperation with local, state, and Federal regulatory agencies, any wildlife hazards arising from existing wetlands located on or near airports. Where required, a WHMP will outline appropriate wildlife hazard mitigation techniques. Accordingly, airport operators should develop measures to minimize hazardous wildlife attraction in consultation with a wildlife damage management biologist (FAA 2007:8).

The area does not support nesting by white-tailed kites. According to the 1997 *Goleta Slough Ecological Management Plan* prepared by the GSMC, the CDFW's 1988 Goleta Slough Ecological Reserve Management Plan was never adopted (City of Santa Barbara 1997:1-1) and a copy of the 1988 draft plan was not available for review based on an internet search. However, the recently

adopted *Goleta Slough Area Sea Level Rise and Management Plan* (GSMC 2015) comprises "an update of previous Slough management plans and includes new detailed information and analysis of future conditions projected to occur as climate changes over the next century." Page 2-76 of this plan states, "More Mesa and the North Bluff area of UCSB [University of California at Santa Barbara] are the only known White-tailed kite nesting sites in the study area." (GSMC 2015).

CDFW-35: This comment reiterates the characteristics of impact from the recommended Taxiway H Airfield Safety Project, and states that they were unable to locate a description of potential impacts to biological resources from maintenance of the "taxiway object free area" that would be associated with the Taxiway H project. The comment then restates the value of the area as a buffer to Carneros Creek.

Response: Refer to Response to Comment CDFW-32 regarding the Taxiway H Airfield Safety Project characteristics and CDFW-34 regarding LCP-mandated buffers from wetlands, including Carneros Creek. According to FAA AC 150-5300-13A, *Airport Design*, Section 404.b (FAA 2014), a taxiway object free area (OFA) shall be "kept clear of service vehicle roads, parked aircraft, and other objects, except for objects that need to be in the OFA for aircraft navigational or aircraft ground maneuvering purposes." As far as maintenance of the taxiway OFA, the grass would be mowed to approximately six to eight inches in height to discourage the foraging of the area by birds. This is the practice that currently occurs in this area of the Airport, and would not change as a result of the Taxiway H project.

CDFW-36: This comment states that the general area of the recommended Taxiway H Airfield Safety Project serves other important functions with the Slough ecosystem including: foraging habitat for local declining raptor species; breeding and foraging habitat for declining passerine birds such as the horned lark; flood refugia for wildlife during high flow events; and direct coastal habitat values under various sea level rise scenarios.

Response: The Program EIR identifies general types of impacts anticipated for the Master Plan and recommended projects. The Program EIR is not intended to take the place of future project-specific evaluation of impacts of the Taxiway H Airfield Safety Project, but rather to provide a framework for future mitigation and an overall policy consistency analysis. The extent to which the statements in this comment are accurate has not yet been assessed relative to this specific project. See also Topical Response #1 and Response to Comment CDFW-35.

CDFW-37: This comment states that aspects of the WHMP result in adverse impacts to habitats and wildlife and that the existing 1988 MOU between the CDFW and the City prohibits mowing in the area.

Response: Refer to Response to Comment CDFW-33. The Airport's existing mowing activities and future wildlife hazard management activities recommended in the WHMP are not a part of the Airport Master Plan. Discussion of wildlife hazard management for the Airport in the Program EIR is within the context of Applicable Plans and Policies (Section 4.2.2) related to biological resources. A wildlife hazard management plan is an operational document required by FAA for a Part 139-certificated airport.

CDFW-38: This comment states that if the Taxiway H Airfield Safety Project would require new or intensified hazing or habitat modification activities, these must be fully disclosed, and mitigated, in the Program EIR.

Response: The Master Plan and Taxiway H Airfield Safety Project along the north side of Runway 7-25 will not require a change in the Airport's existing mowing activities. This area is already mowed as part of the area around the runway that is managed for wildlife hazard purposes.

CDFW-39: This comment states that the habitat values and functions in the Taxiway H Airfield Safety Project area should be viewed as environmentally sensitive habitats in the Coastal Zone and protected as such. It also states that the Department must weigh the area's habitat values when it considers proposals to exclude the Taxiway H from the Ecological Reserve and replace it with land elsewhere and that the previously stated concerns must be fully disclosed and evaluated in the Program EIR.

Response: The Taxiway H Airfield Safety Project has not been designed as part of the adoption of the proposed Airport Master Plan and, thus, the evaluation recommended in this comment is not ripe at this time. The intent of LU/mm-3 of the Program EIR is to identify an additional CDFW discretionary action that would need to occur should the Airport opt to move forward with the Taxiway H project. Including LU/mm-3 as part of the Program EIR's mitigation and monitoring program ensures that the necessary additional review and concurrence from responsible agencies will be required prior to implementation of the future project, or it cannot be approved.

CDFW-40: This comment discusses details of the draft Programmatic Wetland Restoration Plan contained in the Recirculated Draft Program EIR.

Response: Refer to Topical Response #2. Specific comments regarding the Programmatic Mitigation Plan (PMP) were discussed with the CDFW during a field visit on April 13, 2017. The Final Program EIR (BIO/mm-1) contains measures from the revised PMP that includes measures for both wetland and upland impacts. The final PMP reflects both discussions between the Airport and the CDFW on the Department's concerns identified in this comment letter and during a field visit (April 13, 2017) of the Taxiway H Airfield Safety Project site and proposed mitigation areas (Final Program EIR, **Exhibit 4D**). See **Appendix D** of this Final Program EIR for a technical memorandum containing additional information on the revised PMP.

CDFW-41: This comment states that as a Responsible Agency for the Goleta Slough Ecological Reserve, the Department has discretionary approval over any land swap with GSER lands as proposed in LU/mm-3. The comment also states that the Program EIR does not contain enough information for the Department to make such a determination.

Response: Comment noted. LU/mm-3 is not required to be implemented prior to adoption of the proposed Master Plan. Rather, as explained in Response CDFW-39, the intent of LU/mm-3 of the Program EIR is to stipulate what discretionary actions would need to occur should the Airport move forward with the Taxiway H Airfield Safety Project. Including LU/mm-3 as part of the Program EIR's mitigation and monitoring program ensures that the necessary additional review and concurrence from responsible agencies will be required prior to implementation of the future project, or any project involving a "swap" of GSER lands cannot be approved.

CDFW-42: The comment states that the Program EIR should quantify or analyze the adverse effects of noise to both resident and migratory wildlife from new sources of noise and vibration in new areas and increases in enplanements/air traffic over time. It then provides extensive information regarding hearing abilities and physiological effects of noise on various wildlife species. It also makes the statement that the new Taxiway H Airfield Safety Project would introduce "new very loud and frequent" noise events close to Carneros Creek.

Response: The information regarding noise effects on wildlife is noted. However, the assumption that the Taxiway H Airfield Safety Project would introduce "new very loud and frequent" noise events is not correct given the proximity of the taxiway to the Airport's primary runway. The noise events related to aircraft landing and taking off provide a level of ambient noise that would overshadow the lesser noise of a taxiing aircraft. Also, while the overall sound levels would not be altered, the Taxiway H Airfield Safety Project would result in the routing of some aircraft off Taxiway A, which is approximately 50 feet from Basins D, E/F, and G of the Goleta Slough. These areas provide suitable habitat for various waterfowl species, migrating shorebirds, and nesting songbirds, including Belding's savannah sparrow, a state-listed endangered species. By contrast, the proposed Taxiway H project would be located approximately 200 feet from Carneros Creek and associated riparian vegetation. Some of the species noted above as using areas adjacent to Taxiway A also occupy habitats associated with Carneros Creek (although little suitable habitat for Belding's savannah sparrow occurs there). However, the linear strip of sensitive habitat along Carneros Creek is both smaller than the areas that are currently affected by noise from Taxiway A, and farther from the source of potential noise associated with the proposed Taxiway H Airfield Safety Project.

With respect to the physiological effects of noise on wildlife species, it should also be noted that the proposed Master Plan neither dictates nor anticipates major changes to the composition of aircraft utilizing the airport. The update is primarily aimed at improving airfield safety and security by segregating the general aviation activities (which essentially involve lighter piston-

engine airplanes and corporate grade jet aircraft) from commercial airline activities; while these activities are proposed to be reconfigured into separate independent areas of the airport, the types and numbers of aircraft conducting operations at the airport would not be altered by the proposal. As such, given the presence of the same noise sources, the overall sound intensity, frequency spectrum, and variation of sound levels throughout the day would not be altered between existing conditions and implementation of the proposed Master Plan. Consequently, it is not expected that physiological responses for wildlife species currently affected by airport noise sources would be any different under the proposed Master Plan.

Please refer to Responses CDFW-44 through CDFW-47, which respond to the detailed comments related to the summary statements provided in these introductory remarks.

CDFW-43: This comment summarizes the information regarding existing (2011) Community Noise Equivalent Levels (CNEL) at the Airport provided in the Recirculated Draft Program EIR (Exhibit 4J) and then refers to the noise discussion provided in the Initial Study (Figures 11 and 12), which show that the Airport CNEL will decrease in the future.

Response: Comment noted. Due to a Congressional mandate for the phasing out of older, noisier aircraft nationwide by 2015 and the anticipated economic-based decisions of Airport users to move towards more technologically-advanced business aircraft, the 60 and 65 CNEL for the Airport by 2017 are expected to be smaller than what existed in 2011 (which was the base year for the proposed Airport Master Plan). By the year 2032, the noise contours are expected to expand some over what would occur in 2017 due to an increase in overall Airport activity, but are still expected to remain closer to the Airport than what currently exists.

Thus, the cumulative change in noise at the Airport over time was found to be a Less than Significant impact of the proposed Master Plan (Initial Study, page 40). Even with forecasted increases in operations and enplanements, the Airport is likely to experience less overall noise and vibration than it experienced in 2011, due to federally mandated and economically motivated improvements in aircraft technology. See also Response to Comment CDFW- 42.

CDFW-44: This comment requests information on how noise and vibration at the Airport would change if Taxiway H Airfield Safety Project were constructed and operated and how noise and vibration would change over time cumulatively. The commenter states that Carneros Creek is approximately 600 feet north of Runway 7-25, while Taxiway H would be located as close as 200 feet from this preserve boundary. The commenter also points out that CNEL levels decline by only five dBA[1] at a distance of 600 feet from the runway, and therefore noise levels from

[1] A-weighted decibels, abbreviated dBA, or dBa, or dB(a), are an expression of the relative loudness of sounds in air as perceived by the human ear. In the A-weighted system, the decibel values of sounds at low frequencies are reduced, compared with unweighted decibels, in which no correction is made for audio frequency.

the proposed Taxiway H Airfield Safety Project must be considered significant, given a separation distance of only 200 feet between the taxiway and the creek.

Response: First, it should be noted that the Taxiway H Airfield Safety Project is anticipated to be a minimum of 200 feet from the outer edge of the riparian area along Carneros Creek. The creek itself would be even further away. To address Runway 7-25 noise levels at 600 feet compared to the proposed Taxiway H Airfield Safety Project noise levels at 200 feet, the aircraft operations associated with each must be considered and understood. Runway 7-25 is the principal runway dedicated to commercial airline operations, supporting take-off and landing maneuvers not only for heavy commercial jets, but also for lighter general aviation corporate jets and piston-engine propeller driven aircraft. The Taxiway H Airfield Safety Project would be used for the movement of aircraft on the ground between the runway and general aviation aircraft tie-down area and associated support facilities. Commercial airline taxi operations would continue to remain on Taxiway A south of Runway 7-25. Taxiway A provides the most direct route to the airline terminal and reduces the number of active runway crossings. However, to the extent that future aircraft are using Taxiway H instead of Taxiway A, the noise effects of Taxiway A on wildlife within the Slough may be lessened.

The major difference between runway and taxiway aircraft operations is that full engine power is employed for take-off and climb-out from the runway, while taxiing employs the lowest power setting feasible to slowly propel the aircraft along the taxiway. The table below compares the average noise level (dBA L_{EQ}) for take-off and for taxi maneuvers for the three representative aircraft types currently using Runway 7-25 and connecting taxiways. The sound levels are reported for 600 feet from the runway centerline and for 200 feet from the edge of the taxiway, which correspond to the separation distance between each of these facilities and Carneros Creek.

COMPARISON OF AIRCRAFT TAKE-OFF VERSUS TAXI NOISE LEVELS

Representative Aircraft	Take-Off Noise Level [1] (@ 600 feet, dBA L_{EQ})	Taxi Noise Level [2] (@ 200 feet, dBA L_{EQ})
Cessna 207 (Single Engine Piston Driven)	78	73
Canadair Regional Jet / Corporate Jet	75	74
Boeing 737	76	78

Sources:

[1] Title 14 Code of Federal Regulations (CFR) Part 36

[2] *Noise Analysis of Taxi and Queuing Alternatives for the Centerfield Taxiway at Logan International Airport*, Harris Miller Miller & Hanson, Inc., May 2006.

NOTE: The equivalent continuous noise level (L_{EQ}) is the sound pressure level of a steady sound that has, over a given period, the same energy as a fluctuating sound in question. It is an average and is measured in dBA scale.

As illustrated in the table, the sound levels at 200 feet from a taxiing regional jet or piston aircraft would be lower than those at 600 feet for take-off maneuvers of the same aircraft. Sound levels for a taxiing Boeing 737 at 200 feet would be comparable (2 dB higher) to take-off noise levels at

600 feet. The intent of the proposed Airport Master Plan is to segregate airline operations from general aviation operations to increase safety. As previously mentioned, most heavy commercial jets such as the Boeing 737 would continue to be directed to use Taxiway A. With respect to the proposed Taxiway H Airfield Safety Project, noise levels from taxiing general aviation aircraft would be lower than existing noise levels associated with their take-off and landing maneuvers using Runway 7-25. Therefore, noise from aircraft departures from Runway 7 would continue to dominate in this area of the Airport, and the proposed Taxiway H Airfield Safety Project would not significantly increase noise levels at Carneros Creek beyond what is currently occurring.

CDFW-45: This comment states a concern that construction and future airport activity under the proposed Airport Master Plan will disrupt foraging activity of the State-listed Belding savannah sparrow.

Response: Proposed Airport Master Plan activities would be confined to the existing operational areas of the Airport, including the Taxiway H Airfield Safety Project, away from Belding's savannah sparrow habitat. The proposed Taxiway H site, although partly within the boundaries of the GSER, supports minimal vegetation communities suitable for Belding's savannah sparrow nesting (Dudek 2012; Figure 4). Periodic surveys since the early 1990s have not identified territorial or nesting Belding's savannah sparrows in this area, including extensive surveys by Holmgren and Burnell in 1992, Holmgren and Kisner in 1994, and published results of more recent surveys in 2001, 2006, 2010, and 2015 (Holmgren and Burnell 1992; Holmgren and Kisner 1994; Zemball et al. 2015). In addition, measures BIO/mm-3 and BIO/mm-4 will ensure avoidance of any impacts to Belding's savannah sparrows. BIO/mm-3 requires a pre-construction bird survey if work is conducted during the nesting season, establishment of buffers around nests, and worker education on the sensitive nature of areas where birds are nesting. BIO/mm-3 requires a focused survey for Belding's savannah sparrow and concurrence of CDFW with negative survey results. It also requires monitoring during construction for the presence of Belding's savannah sparrow, as well as regular monitoring of noise levels that may be disruptive to the species. Refer also to Response to Comment CDFW-44.

CDFW-46: This comment states that the Program EIR only addresses construction noise impacts, not operational impacts from noise and vibration. It also states that using an averaging noise metric, i.e., CNEL, the individual short duration high noise events tied to taxiing, landings, and takeoffs are not evaluated for adverse noise effects to fish and wildlife.

Response: See Response to Comments CDFW-42 through CDFW-45. The standard for California noise characterization related to airport operations has always been CNEL because of its ability to evaluate airport operational noise effects upon the urban populations surrounding these facilities. Since it is not anticipated that substantial changes to operational noise levels would result from the Airport Master Plan, attempts were not made to evaluate noise characteristics under a different metric. However, for clarification, the 65-75 CNEL contour that encompasses the proposed Taxiway H Airfield Safety Project area results primarily from Runway 7-25 activities.

This noise level would equate to take-off and landing activity occurring for approximately 10 minutes of each hour (with an average noise level of 75 dBA), with the other 50 minutes of each hour having a background level of approximately 60 dBA. The hourly average of these individual 75 dBA events, along with a 60-dBA background, would be 68 dBA L_{EQ}. If this average hourly level was present 24 hours per day, the CNEL value would be 75. These noise ranges and the relative portion of each hour with activity on Runway 7-25 are not anticipated to be affected by the implementation of the proposed Airport Master Plan.

As previously discussed in Response to Comment CDFW-42, the Taxiway H Airfield Safety Project would result in the routing of some aircraft off Taxiway A, which is approximately 50 feet from Basins D, E/F, and G of the Goleta Slough. These areas provide suitable habitat for various waterfowl species, migrating shorebirds, and nesting songbirds, including Belding's savannah sparrow, a state-listed endangered species. By contrast, the proposed Taxiway H project would be located approximately 200 feet from Carneros Creek and associated riparian vegetation. Some of the species noted above as using areas adjacent to Taxiway A also occupy habitats associated with Carneros Creek (although little suitable habitat for Belding's savannah sparrow occurs there). However, the linear strip of sensitive habitat along Carneros Creek is both smaller than the areas that are currently affected by noise from Taxiway A, and farther from the source of potential noise associated with the proposed Taxiway H Airfield Safety Project.

CDFW-47: This comment states that the City of Santa Barbara's General Plan states that "Noise, air pollution, and all other adverse environmental and ecological impact must be reduced and held at absolute minimum levels." (NOTE: The correct Recirculated Draft Program EIR reference is page 4-67.) The comment then states that this requirement has yet to be achieved and that noise and vibration impacts to wildlife due to the proposed Airport Master Plan are Class I. The comment concludes that the recommended Taxiway H Airfield Safety Project be relocated off the GSER.

Response: The above quote from the 1995 City General Plan (Land Use Element) does not preclude reducing project impacts through mitigation. BIO/mm-1, as well as numerous other mitigation measures, are included in the Program EIR to meet the intent of this basic principle. The Taxiway H Airfield Safety Project itself will be subject to further environmental evaluation. However, it should be noted that its location is fixed by function due to FAA design standards.

CDFW-48: This comment reiterates that the Department recommends an evaluation of specific noise impacts to wildlife species using substantial data and scientific information and that the analysis should not be weighted based upon human hearing. The comment also states that the loss of a 400-foot buffer from the runway (to Carneros Creek) constitutes a significant impact to wildlife in the G-S-R zone and on the GSER. Feasible alternatives and mitigation may not be possible and thus impacts to environmentally sensitive habitats and species should be considered Class I.

Response: See Response to Comments CDFW-42 through CDFW-47, which explain that due to the overall noise environment from the use of Runway 7-25, implementation of the proposed Master Plan projects will not have significant changes to the existing noise conditions affecting wildlife that live in proximity to the airfield. See also Response to Comment CDFW-34. The proposed Taxiway H Airfield Safety Project would retain an approximate 200-foot buffer from the riparian area along Carneros Creek, which is an area that provides an additional vegetated barrier between the airfield and the creek itself. This is more than double the distance required by the Airport's LCP (Policy C-4), which requires a 100-foot minimum buffer.

CDFW-49: This comment discusses the Department's concerns regarding a loss of cumulative foraging habitat for the white-tailed kite.

Response: This concern is addressed in Topical Response #1 and **Appendix C** of this Final Program EIR. The analysis concludes that although brome grasses like those present at the proposed Taxiway H Airfield Safety Project site are considered to provide suitable foraging for kites, the lack of small mammals (based on recent trapping efforts), the absence of kites in the area north of the runway (during a year-long survey effort), and the distance of the Taxiway H project site from known nest locations (Final Program EIR, **Appendix C**, **Figure 1**) suggest that the area only provides low-quality foraging habitat for nesting white-tailed kites. While approximately 498 acres of suitable kite foraging habitat has been, or is anticipated to be, impacted in the region by past, present, or probable future projects (Final Program EIR, **Appendix C**, **Table 1**), there are over 4,500 acres of annual grasses and forbs within the cumulative study area (Final Program EIR, **Appendix C**, **Figure 2**). Relative to the amount of available habitat in the region, the permanent loss of 6.1 acres of low-quality foraging habitat is considered less than significant, both on a project-specific and cumulative level.

CDFW-50: This comment states that the Department should have final approval over wetland and upland mitigation on the GSER, not the GSMC. The comment also states that upland mitigation should occur at a higher ratio than 1:1 to offset cumulative losses of raptor foraging habitat.

Response: It is acknowledged that the CDFW will have final approval over wetland and upland mitigation for activities affecting protected resources within the GSER. As discussed in Response to Comment CDFW-40 and Topical Response #2, the Final Program EIR (BIO/mm-1) contains a revised PMP (BIO/mm-1) that includes measures for both wetland and upland impacts. The final PMP reflects discussions between the Airport and the CDFW on the Department's concerns identified in this comment letter as well as during a field visit (April 13, 2017) of the Taxiway H Airfield Safety Project site and proposed mitigation areas (Final Program EIR, **Exhibit 4D**). Included in the revised PMP is a minimum upland mitigation ratio of 3:1 with the final ratio to be determined by the appropriate regulatory agencies. Comments on future project-specific HMMPs will be solicited from the GSMC, but they do not have regulatory authority to approve

them. See **Appendix D** of this Final Program EIR for a technical memorandum containing additional information on the revised PMP.

CDFW-51: This comment states that the Department supports the Environmentally Superior alternative presented in the Program EIR and recommends that the Airport more fully evaluate other means to improve safety other than the Taxiway H Airfield Safety Project. The comment specifically suggests increased air traffic controllers and better on-the-ground management.

Response: Refer to Response to Comment AUD-50. FAA encourages airport design strategies to prevent runway incursions (FAA 2007, Engineering Brief No. 75, *Incorporation of Runway Incursion Prevention into Taxiway and Apron Design*). The proposed Airport Master Plan, therefore, addresses design solutions to the four taxiway "hot spots" (Airport Master Plan, Exhibit 4C). In an April 2012 FAA Runway Safety Action Team (RSAT) meeting, the RSAT team recommended that the airport and air traffic develop alternatives to avoid having aircraft taxi on the runway and crossing the high-energy segment of the runway. Included in the recommendation was to pursue "plans to extend Taxiway H to the approach end of Runway 7 in order to eliminate crossings in the high-energy segment of the runway as well as taxiing on the runway" (Appendix A, Recirculated Draft Program EIR, page A-8).

It should be noted as well that the funding and hiring of air traffic controllers is the responsibility of FAA; the City of Santa Barbara does not have the jurisdiction to make these changes. However, the Airport is always considering and implementing better on-the-ground management. This practice does not offset the benefits of the Taxiway H Airfield Safety Project, nor does the Taxiway H project preclude the Airport from pursuing additional air traffic controllers with FAA.

CDFW-52: This comment requests that special-status species and natural communities detected during project surveys be reported to the California Natural Diversity Database (CNNDB).

Response: Comment noted. The survey data has been reported to the CNNDB.

CDFW-53: This comment states that filing fees for the Department's time to evaluate the proposed project is necessary upon filing of the Notice of Determination by the Lead agency.

Response: Comment noted.

CDFW-54: This comment states that the Department, as a Responsible Agency, may choose to disapprove the "project" per CEQA Guidelines Section 15042, and that they do not believe the City has the basis to approve the "project" or make findings per CEQA unless the Program EIR

is modified to eliminate and/or mitigate significant impacts, notwithstanding a statement of overriding considerations.

Response: No additional discretionary action other than City approval is necessary for adoption of the proposed Airport Master Plan and the CDFW is not a Responsible Agency under CEQA. Topical Response #3 further clarifies the future environmental analysis that will be required for specific development projects at the time that they are ripe for review. Provisions for Responsible Agencies under CEQA Guidelines Section 15042 are recognized and acknowledged.

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September 12, 2016

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

RE: Recirculated Airport Master Plan Draft EIR

Dear Mr. Bermond,

Please accept the following comments on the Recirculated Draft Programmatic Environmental Impact Report (RDPEIR) for the Santa Barbara Airport Master Plan (AMP), which are hereby submitted by Santa Barbara Channelkeeper.

Santa Barbara Channelkeeper is a local non-profit environmental organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds through science-based advocacy, education, field work and enforcement. Channelkeeper also serves on the Goleta Slough Management Committee. While we appreciate the City's efforts to proactively plan for future development at the Santa Barbara Airport through the AMP and PEIR, we have serious concerns with the inclusion of Taxiway H as a potential project. While we understand and respect the Airport's need to make safety improvements, this project will have a significant effect on important environmental resources, and Channelkeeper does not agree that the mitigation measures proposed in the RDPEIR will be sufficient to reduce impacts to a less than significant level. To address these concerns, Channelkeeper recommends adding an additional mitigation measure that would guarantee a complete EIR, with requisite public review, will be developed for the Taxiway H extension project. Without this assurance, Channelkeeper will strongly advocate for the adoption of the Environmentally Superior Alternative that does not include the Taxiway H project. SBCH-5

Inadequate Analysis of Habitat and Impact

The habitat that would be removed through the Taxiway H extension provides critical upland and foraging habitat for a variety of special species, and in non-drought years may include potential wetlands. It is important to maintain a diverse array of habitat types to ensure a healthy and resilient Goleta Slough ecosystem, and although we appreciate the Airport's effort to restore wetlands as mitigation, there are also other critical values associated with upland habitat that should not be forsaken. The RDPEIR proposes habitat mitigation at four potential sites, yet it is unclear that an appropriate habitat match is available in those sites. SBCH-6

The vegetation maps were based on woefully inadequate surveys conducted in just a two-month period in a drought year. It is clear that a much more in-depth analysis is necessary in order to truly determine impact and potential mitigation sites. Much of the 29.8 acres identified as potential habitat mitigation sites are likely not similar habitat and are less ecologically functional due to their proximity to highly disturbed areas that feature noise, collision hazard, and pollution potential through impervious surfaces. Additionally, the RDPEIR does not delineate performance standards for successful mitigation and fails to include monitoring to ensure that Best Management Practices are implemented correctly to prevent water quality impacts from pollutants. SBCH-7 SBCH-8

WATERKEEPER ALLIANCE MEMBER
CALIFORNIA COASTKEEPER ALLIANCE

Channelkeeper is particularly concerned about the potential impact to the Goleta Slough Ecological Reserve (GSER). This area has been designated due to the Slough's sensitive, unique, and significant ecosystem and development in and near the GSER could have detrimental impacts. During recent Goleta Slough Management Committee meetings it became clear that there are discrepancies regarding the boundaries of the GSER. These discrepancies must be corrected in order to determine the true impact to the GSER. This is particularly important as it will impact how the Airport will be able to mitigate loss of GSER area due to Taxiway H and other projects associated with the AMP. SBCH-9

Need to Strengthen Alternatives Analysis

The RDPEIR also fails to adequately evaluate available alternatives to the Taxiway H project. Again, Channelkeeper appreciates the Airport's need to make safety improvements, but it is unclear if a less environmentally harmful alternative is available that would meet the same safety objectives. The RDPEIR should be updated to include alternative traffic patterns and strategies along existing runways that would facilitate avoidance of high impact crossings. Specifically, while the RDPEIR does point to one other alternative, additional review should be provided for options that route taxiing traffic toward the main terminal and provide for a crossing at the eastern end of Runway 7-25. Although these routes may increase taxiing time, it would be worth the avoidance of significant environmental degradation while still meeting the Airport's safety concerns. SBCH-10

Mitigation Measures Not Sufficient to Reduce Impact

Currently, the RDPEIR only indicates where habitat mitigation may occur, but fails to identify where GSER boundaries would be modified. Channelkeeper fears the Airport views the GSER as a mitigation bank. This is not appropriate. Any area proposed to be added to the GSER as mitigation for lost area due to any project associated with the AMP would need to be of the same habitat, ecological value, and ecosystem function to be considered adequate mitigation. While the proposed Programmatic Wetland Restoration Plan (BIO/mm-1) begins to outline potential ways the Airport will mitigate impact, it lacks the specificity and in-depth habitat studies to adequately mitigate impact, particularly as it relates to GSER boundary mitigation in addition to habitat loss mitigation. In initial discussions with other stakeholders through the Goleta Slough Management Committee, Channelkeeper is concerned that sufficient appropriate mitigation sites may not exist. SBCH-11

Channelkeeper is also concerned that mitigation of wetlands and riparian/wetland buffers will only be done at a minimum ratio of 2:1 and upland habitat at only by 1:1. The RDPEIR acknowledges that agencies may require higher mitigation, which is almost certain to be true. The 2:1 mitigation ratio is also in direct conflict with Local Coastal Plan (LCP) Policy C-11, while the RDPEIR claims that mitigation will follow LCP policies. BIO/mm-2 specifically points to Policy C-11 for impacts during construction activities and BIO/mm-1 (the Programmatic Wetland Restoration Plan) states in section 3 that mitigation activities "shall comply" with the LCP. While C-11 specifically identifies two projects that were proposed at the time, the Taxiway H project is also identified as an "Airfield Safety Project" and thus should follow the same, if not stricter, mitigation ratios. If agencies do require more than a 2:1 ratio, the outlined 29.8 acres identified in the RDPEIR (much of which is likely not suitable habitat for mitigation) will not be sufficient to mitigate the up to 12.4 acres impacted by the Taxiway H project. Due to the significant impact on important environmental resources and lack of appropriate mitigation it is unlikely inconsistencies with the Airport's LCP and the City's General Plan will be rectified. Ultimately, we believe the inadequacies of analysis and proposed mitigation measures associated with Taxiway H qualify BIO-1, BIO-2, BIO-4, LU-4, and LU-6 as Class I impacts rather than Class II impacts. SBCH-12

Recommended Mitigation Measure

Due to the potential impacts of the Taxiway H extension and the unclear, delayed, and inadequate mitigation measures proposed in the RDPEIR for the project, Channelkeeper asks that a new mitigation measure be added which guarantees that a full EIR will be separately developed for the Taxiway H project. While the individual projects included in a PEIR must also go through the CEQA process, the PEIR serves as a guiding document to evaluate the level of environmental review that is required. Often, the PEIR contains enough information for a more limited environmental review of the specific project. As outlined above, the RDPEIR does not contain enough information or adequate mitigation measures, and thus a more thorough review is necessary. We are particularly concerned that the Taxiway H project could receive a more limited environmental review that will not incorporate public review and input and will not include the additional analysis necessary to adequately determine and mitigate impacts. Channelkeeper's concerns with the AMP would be addressed if a mitigation measure was included that would require an EIR for the Taxiway H project. At that time, a full range of alternatives would be able to be explored, jurisdictional boundaries defined, biological surveys updated, and more complete mitigation and restoration plan developed. Until a full EIR for the Taxiway H project with detailed mitigation plans is guaranteed, the impacts from Taxiway H cannot be classified as Class II. If this mitigation measure is not incorporated into the AMP, Channelkeeper will strongly advocate for the adoption of the Environmentally Superior Alternative which excludes the Taxiway H extension.

SBCH-13

Thank you for the opportunity to comment on the RDPEIR for the Airport Master Plan; we appreciate your attention to the issues and concerns we raise and trust you will address them before certifying the PEIR. Please feel free to contact me via email at jennad@sbck.org or telephone at 805.563.3377 ext.5 should you have any questions.

Sincerely,



Jenna Driscoll, Watershed and Marine Program Associate

Response to Recirculated Draft Program EIR - Letter 10
Santa Barbara Channelkeeper (SBCH)
Dated September 12, 2016

*SBCH-1 through SBCH-4 are included in **Appendix A** of this Final Program EIR.*

SBCH-5: This comment states that the organization has serious concerns with the potential Taxiway H Airfield Safety Project and recommends that a mitigation measure be added to the Program EIR requiring a complete EIR on the project in the future. The comment also notes that Santa Barbara Channelkeeper serves on the Goleta Slough Management Committee (GSMC).

Response: See Topical Response #3. All projects recommended in the proposed Airport Master Plan that meet the definition of a project under the *California Environmental Quality Act* (CEQA) and need future discretionary approvals will be required to complete some level of environmental review. However, it is not appropriate for the type of environmental document to be determined at this time when neither the timing, the scope, or the design of such projects are available. The Taxiway H Airfield Safety Project would require a Local Coastal Plan (LCP) amendment, General Plan amendment, and rezone prior to the issuance of a Coastal Development Permit for the project. These tasks cannot be approved until the State environmental review process for all discretionary actions is complete. A provision stating that the Airport will solicit comments from the GSMC on the Programmatic Mitigation Plan (PMP) as well as on all future project-specific Habitat Mitigation and Monitoring Plans (HMMPs) has been added to BIO/mm-1.

SBCH-6: This comment states that the habitat that would be removed by the Taxiway H Airfield Safety Project provides both critical upland habitat and potential wetlands in non-drought years. It also states that it is important to maintain a diverse array of habitat types in the Goleta Slough ecosystem and that the proposed mitigation sites do not necessarily contain an appropriate habitat match.

Response: See Topical Response #2. BIO/mm-1 has been augmented to include: additional habitat restoration areas that have been reviewed by the California Department of Fish and Wildlife (CDFW); compensatory mitigation for upland habitat, as appropriate; measures to enhance and restore biodiversity in the Slough; and a requirement for proposed mitigation areas to be surveyed within one year of the approval of an associated HMMP to confirm that they remain suitable mitigation areas.

SBCH-7: This comment states that the vegetation maps (used in the Program EIR) are inadequate and conducted in only a two-month period in a drought year and that more in-depth analysis is necessary to truly determine impacts and potential mitigation sites.

Response: The vegetative maps were completed by a qualified biologist with extensive local experience, including in-depth knowledge of the Goleta Slough. Wetland and sensitive-species surveys of the Goleta Slough used in this Program EIR were conducted in 2012 as part of the Master Plan resources inventory, and occurred before the most recent drought was in full effect. The Notice of Preparation for this Program EIR was issued in 2014. However, because this was a year of drought conditions, earlier surveys prior to the drought were used. More detailed site-specific vegetative and wildlife surveys will occur when project-specific analyses and HMMPs are prepared.

SBCH-8: This comment states that the proposed potential habitat mitigation sites are not likely similar habitat and are less ecologically functional (than the Taxiway H Airfield Safety Project area) and that the Recirculated Draft Program EIR does not include mitigation performance standards or monitoring for water quality standards.

Response: The City of Santa Barbara does not agree that the proposed habitat mitigation sites are less ecologically functional than the Taxiway H Airfield Safety Project area. The primary habitat located in the area of the proposed Taxiway H Airfield Safety Project is disturbed annual brome grassland that is composed primarily of non-native grasses, broad-leaf forbs, and noxious weeds, and would likely meet only the one-parameter test for jurisdictional wetlands. The Taxiway H Airfield Safety Project area is part of the airfield that is routinely mowed for maintenance and wildlife hazard management and is already zoned as Airport Approach and Operations (A-A-O) in addition to Goleta Slough Reserve (G-S-R). On the other hand, the proposed mitigation areas are located within the contiguous part of the Slough or immediately adjacent and contain areas that could benefit from restoration and enhancement. See also Topical Response #2.

Performance standards have been added to BIO/mm-1. The City's existing Storm Water Management Plan (SWMP) and airport stormwater pollution prevention plan (SWPPP) already include monitoring for water quality standards.

SBCH-9: This comment states that the City needs to correct discrepancies in the Goleta Slough Ecological Reserve (GSER) boundary.

Response: Comment noted. The City plans to work with CDFW to resolve this issue and has had preliminary conversations with the Department on the subject. Future project-specific HMMPs that involve the Goleta Slough must be approved by CDFW and reflect an accurate GSER boundary.

SBCH-10: This comment proposes an alternate taxiway configuration to the Environmentally Superior alternative and believes that alternative traffic patterns should be considered.

Response: FAA's Advisory Circular (AC) 150/5300-13A, *Airport Design* (FAA 2014) states the following: "A parallel taxiway eliminates using the runway for taxiing, thus increasing capacity and protecting the runway under low visibility conditions. In addition, a full length parallel taxiway is required for instrument approach procedures with visibility minimums below ¾ mile and recommended for all other conditions." AC 150/5300-13A also states that, "The airport designer must keep basic concepts in mind to reduce the probability of runway incursions through proper airport geometry. This is particularly important when designing a taxiway system." Two of these basic concepts that apply to taxiway design are detailed below.

> "(c) Limit runway crossings. The airport designer can reduce the opportunity for human error by reducing the need for runway crossings. The benefits of such design are twofold – through a simple reduction in the number of occurrences, and through a reduction in air traffic controller workload."
>
> "(d) Avoid "high energy" intersections. These are intersections in the middle third of the runways. By limiting runway crossings to the outer thirds of the runway, the portion of the runway where a pilot can least maneuver to avoid a collision is kept clear."

Crossing the end of Runway 7 (i.e., east end) would result in aircraft mixing in with other aircraft that need to depart on Runway 25 as well as a need to cross both crosswind runways (Runway 15R-33L and Runway 15L-33R). Continuing this practice in the future will result in additional safety concerns, increased potential for runway incursions, increased taxiing times, delays to both arriving and departing aircraft, and increased air traffic controller workload. It would also route additional aircraft through another taxiway hot spot (i.e., Hot Spot #4, Airport Master Plan, Exhibit 4C).

This comment also suggests that safety concerns could be solved by altering traffic approach patterns. For safety purposes, aircraft should take off and land into the wind. The air traffic controllers cannot simply change the flow of traffic so that aircraft land with a tailwind, creating an unsafe operating condition. For example, when the Airport is in a "west flow" condition (Runway 25) (60 percent of the time), the air traffic controllers cannot select specific aircraft that want to access facilities on the north side of the Airport and have them land from the west. This would result in an extremely dangerous "head-to-head" operating condition. Conversely, when the Airport is in an "east flow" condition (Runway 7), which occurs approximately 40 percent of the time, all the aircraft on the north side of Runway 7-25 that require Runway 7 for departure would need to cross Runway 7-25 to utilize Taxiway A for access to the western end (Runway 7). Again, this would result in additional safety concerns, increased potential for runway incursions, increased taxiing times, delays to both arriving and departing aircraft, and increased air traffic controller workload, which reduces this option's feasibility and desirability.

SBCH-11: This comment states that the GSER is not a mitigation bank, and that the PMP does not contain the specificity or appropriate mitigation sites to adequately mitigate the impacts of the Taxiway H Airfield Safety Project.

Response: BIO/mm-1 (i.e., the PMP) provisions have been refined to include: higher mitigation ratios; additional habitat restoration areas; compensatory mitigation for upland habitat, if appropriate; and measures to enhance and restore biodiversity in the Slough. It is important to note that the Program EIR is not intended to take the place of future project-specific environmental evaluation at the time a recommended project is ripe for review. Rather, BIO/mm-1 provides the framework for future HMMPs related to the impacts of a specific project. As discussed in Response to Comment SBCH-8, the proposed mitigation areas are located within the contiguous part of the Slough or immediately adjacent and contain areas that could benefit from restoration and enhancement. As discussed in Topical Response #2, two of the largest recommended mitigation areas are specifically called out as such in the Airport's LCP.

SBCH-12: This comment discusses mitigation ratios and other policies of the current Airport LCP and states that the inadequacies of the analysis and proposed mitigation measures for the Taxiway H Airfield Safety Project make it so the proposed Airport Master Plan biology and land use impacts are Class I (i.e., Significant Environmental Impacts (after mitigation).

Response: BIO/mm-1 (i.e., the PMP) provisions have been refined to include higher mitigation ratios. It should be noted that the proposed Airport Master Plan does not require an LCP amendment, General Plan amendment, or rezone for it to be adopted by the City of Santa Barbara. Approvals for future projects, such as the Taxiway H Airfield Safety Project, would require such actions, but those more specific implementing actions are not ripe for environmental review at this time. They are dependent upon when the City moves forward with specific project designs, acquisition of project funding, and environmental review.

SBCH-13: This comment restates SBCH-5 and requests that a mitigation measure be added to the Program EIR requiring a complete EIR on the project in the future.

Response: See Response to Comment SBCH-5 and Topical Response #3. The Taxiway H Airfield Safety Project would require an LCP amendment, General Plan amendment, and rezone prior to the issuance of a Coastal Development Permit for the project. These tasks cannot be approved until the State environmental review process for all discretionary actions is complete. However, it is not appropriate for the type of environmental document to be determined at this time when neither the timing nor the design of the project is available. A Program EIR does not need, nor is it feasible, to provide a project-specific level of analysis and review for future projects. The CEQA Guidelines provide adequate safeguards to ensure that future projects will be evaluated in an appropriate manner.

STATE OF CALIFORNIA -- NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

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

September 12, 2016

City of Santa Barbara Planning Division
c/o Andrew Bermond, Project Planner
630 Garden Street
Santa Barbara, CA 93101

RE: Airport Master Plan Draft Recirculated Environmental Impact Report (DEIR)

Dear Mr. Bermond,

Commission staff has reviewed the Airport Master Plan Draft Recirculated Environmental Impact Report (DEIR), released in July 2016. The purpose of the subject DEIR is to assess the draft Airport Master Plan (Plan), which provides guidance for the Airport's overall development for the next 15-20 years (2014 to 2032). Our comments below represent our initial consideration of the draft Plan that will be submitted to the Commission as part of a Local Coastal Plan Amendment (LCPA) package by the City of Santa Barbara. The future LCPA submittal will be reviewed in detail and Commission staff may have additional input and suggested modifications to the proposed LCPA language.

The subject Master Plan recommends the extension of Taxiway H west to provide safer access to the north side of the Airport. The subject extension may result in wetland and upland habitat impacts in an area currently zoned Goleta Slough Reserve (G-S-R). As such, Biological Resource Mitigation Measure One (BIO/mm-1) would require the creation of a Programmatic Wetland Restoration Plan (PWRP), which is intended to provide compensatory mitigation. As described in the DEIR, the PWRP states that mitigation for wetland habitat shall be a minimum of 2:1 and upland habitat shall be a minimum 1:1. CCC-1

However, the DEIR also indicates that there is an environmentally superior project alternative that would implement the Master Plan without the Taxiway H extension. This alternative would minimize impacts to both environmentally sensitive habitat and wetland areas. As described above, although the Master Plan would include mitigation measures for habitat impacts, both Coastal Act Section 30233 and 30240, which are incorporated in the City's LCP, require the avoidance of these resources. Only if no feasible alternative exists for avoidance, then the alternative that minimizes impacts to the maximum extent feasible should be selected and mitigation should be required.

In this case, implementation of the environmentally superior project alternative would avoid adverse impacts to sensitive habitat and wetland areas. As such, we recommend that the final Master Plan prioritize implementation of the environmentally superior project alternative. Furthermore, the proposed PWRP mitigation requirements for unavoidable impacts to wetland habitats should be increased to a minimum ratio of 4:1, and upland habitat impacts should be increased to a minimum ratio of 3:1 to ensure consistency with both the certified LCP and past Commission action. CCC-2

Thank you for the opportunity to review and provide comments. If you have any questions regarding these comments, please contact me at 805-585-1800.

Sincerely,

Jacqueline Phelps

Jacqueline Phelps
Coastal Program Analyst

Response to Recirculated Draft Program EIR - Letter 11
California Coastal Commission (CCC)
Dated September 12, 2016

CCC-1: This comment states that since there is an Environmentally Superior alternative to the Taxiway H Airfield Safety Project (i.e., not extending Taxiway H), the Coastal Act Sections 30233 and 30240 require the avoidance of environmentally sensitive habitat and wetland areas.

Response: The Environmentally Superior alternative will not fully meet all the purposes of the proposed project, which include improving the safe and efficient use of the Airport. The Federal Aviation Administration (FAA) encourages airport design strategies to prevent runway incursions (FAA 2007, Engineering Brief No. 75, *Incorporation of Runway Incursion Prevention into Taxiway and Apron Design*). In an April 2012 FAA Runway Safety Action Team (RSAT) meeting, the RSAT team recommended that the airport and air traffic develop alternatives to avoid having aircraft taxi on the runway and crossing the high-energy segment of the runway. Included in the recommendation was to pursue "plans to extend Taxiway H to the approach end of Runway 7 in order to eliminate crossings in the high-energy segment of the runway as well as taxiing on the runway" (Appendix A, Recirculated Draft Program EIR, page A-8). FAA Advisory Circular 150/5300-13A), *Airport Design* (FAA 2014), states in Section 101c, Existing Airports, "Every effort shall be made to bring an airport up to current standards." In addition, Federal Grant Assurance No. 19 requires that the Airport be operated in "a safe and serviceable condition and in accordance with the minimum standards as may be required or prescribed by applicable Federal, state and local agencies for maintenance and operation. It will not cause or permit any activity or action thereon which would interfere with its use for airport purposes."

CCC-2: This comment states that habitat mitigation ratios for the potential Taxiway H Airfield Safety Project should be increased to a minimum ratio of 4:1 for unavoidable wetland habitats and 3:1 for upland habitat impacts in keeping with both the certified Local Coastal Plan and past Coastal Commission action.

Response: Policy C-11 of the Airport's LCP states that (City of Santa Barbara 2003):

> The Airfield Safety Projects, specifically development of the Runway Safety Area Project for Runway 7-25 and construction of Taxiway M, shall not result in the permanent net loss of wetland or upland habitat. Wetland areas temporarily affected by construction activities shall be restored to pre-construction conditions. The required mitigation ratios for the estimated 13.30 acres of permanent wetland and 0.87 acres of permanent upland impacts associated with the Airfield Safety Projects shall be as follows:
>
> • Seasonal Wetlands 4:1

- Creeks and open channels 2: l
- Uplands 1: 1

However, based on this comment, BIO/mm-1 has been refined to include a minimum mitigation ratio of 4:1 for wetland impacts and 3:1 for upland habitat impacts.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3111
TTY 711
http://www.dot.ca.gov/dist05/

Serious drought
Help save water!

September 13, 2016

Mr. Andrew Bermond
City of Santa Barbara
601 Norman Firestone Road
Santa Barbara, CA 93117

SB 217 PM 2.917
SCH#2014061096

Dear Mr. Bermond,

SANTA BARBARA AIRPORT MASTER PLAN DRAFT RECIRCULATED ENVIRONMENTAL IMPACT REPORT (EIR)

The California Department of Transportation (Caltrans) values the role aviation has in California's transportation system and appreciates the opportunity to comment on the Santa Barbara Airport Master Plan Draft Recirculated EIR. We offer the following comments for your consideration.

1. The Traffic Impact Study completed for the Santa Barbara Airport Master Plan Draft Recirculated EIR utilizes Intersection Capacity Utilization (ICU) methodology for traffic analysis which is not supported by Caltrans. The Measures of Effectiveness used in the ICU methodology have not been vetted by Caltrans and are not recognized by the Federal Highway Administration. Caltrans requests that the Highway Capacity Manual (HCM) be used to calculate Level of Service (LOS) on the State Highway System. This includes recalculating operations of the US 101/Fairview and US 101/Los Carneros interchanges using HCM methodology. DOT-1

2. Caltrans also requests that the recirculated EIR evaluate the SR 217/Sandspit Road interchange operations and SR 217 mainline operations using HCM methodology. The interchange analysis should include the intersection of SR 217 and Sandspit Road, Moffett Road, and SR 217 southbound ramps. It should also include merge/diverge analysis and SR 217 southbound off-ramp queue analysis. The draft recirculated EIR references that analysis of SR 217 and US 101 was addressed in the City of Santa Barbara's Final General Plan EIR, but it is unclear if HCM methodology was used for that traffic analysis and to what extent it analyzed SR 217. This information is especially important to disclose as the Traffic Impact Study Airport Project Trip Distribution projects that the majority of trips (70 percent) will be using SR 217 for egress and ingress to the Santa Barbara Airport. This could create a potentially significant impact on SR 217 and should be analyzed to determine if mitigation is warranted. DOT-2

If you have any questions, or need further clarification on items discussed above, please do not hesitate to contact me at (805) 549-3800 or melissa.streder@dot.ca.gov.

Sincerely,

Melissa Streder

Melissa Streder
Planning and Development Review
Caltrans District 5

c. Larry Newland, Frank Boyle, Hana Mengsteab

Response to Recirculated Draft Program EIR - Letter 12
California Department of Transportation (DOT)
Dated September 13, 2016

DOT-1: This comment requests that the Highway Capacity Manual (HCM) methodology be used to calculate Level of Service (LOS) on the State Highway System.

Response: Comment noted. As requested, below are LOS analyses for the intermediate- and long-term scenarios for four intersections within the project study area that are part of the State Highway System: Los Carneros Road & United States (U.S.) 101 northbound ramp; Los Carneros Road & U.S. 101 southbound ramp; Fairview Avenue & U.S. 101 northbound ramps; and Fairview Avenue & U.S. 101 southbound ramps. The overall result when compared to the Intersection Capacity Utilization (ICU) methodology used in the Program EIR did not change. All intersections studied on the State Highway System will operate at LOS A, B, or C for the AM peak hour and LOS B or C during the PM peak hour.

INTERMEDIATE TERM (2022) CONDITIONS

PEAK-HOUR INTERSECTION LEVEL OF SERVICE (LOS) SUMMARY

INTERSECTION		PEAK HOUR	INTERMEDIATE TERM (2022)		INTERMEDIATE TERM (2022) BASELINE PLUS PROJECT			
			Delay[1]	LOS[2]	Delay[1]	LOS[2]	Change[3]	Significant?
1	Los Carneros Rd & US 101 NB Ramp	AM	28.9	C	28.9	C	0.0	NO
		PM	20.9	C	20.9	C	0.0	NO
2	Los Carneros Rd & US 101 SB Ramp	AM	11.6	B	11.6	B	0.0	NO
		PM	27.8	C	27.8	C	0.0	NO
7	US 101 NB Ramps & Fairview Ave	AM	17.9	B	18.3	B	0.4	NO
		PM	24.9	C	25.2	C	0.3	NO
8	Fairview Ave & US 101 SB Ramps	AM	13.9	B	13.9	B	0.0	NO
		PM	20.3	C	21.2	C	0.9	NO

Source: Kimley-Horn and Associates, Additional Traffic Analysis, September 2016.

Notes:

[1] Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle.

[2] LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 9.

[3] Change in delay due to addition of project traffic.

LONG TERM (2032) CONDITIONS
PEAK-HOUR INTERSECTION LEVEL OF SERVICE (LOS) SUMMARY

INTERSECTION		PEAK HOUR	LONG TERM (2032) BASELINE		LONG TERM (2032) BASELINE PLUS PROJECT			
			Delay[1]	LOS[2]	Delay[1]	LOS[2]	Change[3]	Significant?
1	Los Carneros Rd & US 101 NB Ramp	AM	29.1	C	29.1	C	0.0	NO
		PM	18.7	B	18.7	B	0.0	NO
2	Los Carneros Rd & US 101 SB Ramp	AM	9.2	A	9.2	A	0.0	NO
		PM	28.4	C	28.4	C	0.0	NO
7	US 101 NB Ramps & Fairview Ave	AM	13.8	B	14.1	B	0.3	NO
		PM	23.8	C	24.0	C	0.2	NO
8	Fairview Ave & US 101 SB Ramps	AM	12.2	B	12.5	B	0.3	NO
		PM	18.3	B	18.6	B	0.3	NO

Source: Kimley-Horn and Associates, Additional Traffic Analysis, September 2016.

Notes:

[1] Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

[2] LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 9.

[3] Change in delay due to addition of project traffic.

Two additional intersections within the project study area that are part of the State Highway System (i.e., Hollister Avenue & State Route [SR] 217 westbound and Hollister Avenue & SR 217 eastbound) are planned to be converted to roundabouts and will no longer function as signalized intersections. Therefore, these intersections were analyzed in the Traffic Impact Study using the HCM 2010 traffic signal delay parameters in Sidra 6 software.

DOT-2: This comment requests that the Program EIR evaluate the SR 217/Sandspit Road interchange operations and SR 217 mainline operations.

Response: The proposed project will not add additional traffic through the SR 217/Sandspit Road intersection and, thus, the SR 217 corridor was not included within the study. The proposed Airport Master Plan will relocate existing trips generated by the fixed base operator (FBO) located south of the commercial passenger terminal by moving the FBO to the north side of the Airport off Hollister Avenue. This will redistribute trips between William Moffett Place and SR 217 to east and west along Hollister Avenue.

CITY OF GOLETA

September 13, 2016

SENT VIA EMAIL
ABermond@SantaBarbaraCA.gov

CITY COUNCIL

Jim Farr
Mayor

Tony Vallejo
Mayor Pro Tempore

Roger S. Aceves
Councilmember

Michael T. Bennett
Councilmember

Paula Perotte
Councilmember

CITY MANAGER
Michelle Greene

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

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

Dear Mr. Bermond,

The City of Goleta staff (City) has reviewed the Recirculated Draft Program Environmental Impact Report (RDEIR) for the Proposed Airport Master Plan (Project) (SCH#: 2014061096). We appreciate this opportunity to provide additional comments to the Santa Barbara Airport, particularly in light of the fact that Goleta, a mostly built-out City, is uniquely influenced by the City of Santa Barbara's airport and proposed future growth.

On October 30, 2015, the City submitted comments on the Draft Program EIR (DEIR) and the City is pleased that the City of Santa Barbara has taken the time to consider these and other comments and has included additional analysis in the RDEIR. The City understands that the Final Environmental Impact Report (FEIR) will include response to comments for both the initial DEIR and the RDEIR. Consequently, the City will not restate all comments included in the October 30, 2015 letter. However, the City's concerns with the DEIR remain. GOL-79

Based on our review of the RDEIR, we have identified outstanding issues that require correction, clarification, and/or further analysis to ensure that the FEIR provides adequate environmental analysis, as required by law. The City's comments regarding the adequacy of the RDEIR are expressed below.

130 Cremona Drive, Suite B, Goleta, CA 93117 P 805.961.7500 F 805.685.2635 www.cityofgoleta.org

Project Description

As stated in the City's previous comment letter, the Project Objectives are too narrowly constructed so as to provide no feasible alternative that will meet the objectives stated. The "objectives" are really Project components, not overarching goals for the Project. As a result, the RDEIR provides an insufficient range of alternatives to adequately assess other potential Master Plan designs that could prevent impacts identified with the Project. The only alternative outside of the No-Project includes only a slight deviation from the Project Description. This alternative is insufficient to provide a meaningful comparison and does nothing to mitigate the Class I impacts identified in the RDEIR. GOL-80

The City notes the removal of references to the closed auxiliary parking lot north of Hollister Avenue (Lot 2) on figures in the RDEIR. However, references to "consolidated" parking remain throughout the RDEIR. One of the four main components of the Project Description actually includes "Consolidation of automobile parking associated with the Terminal." (RDEIR, 2-1). The City of Santa Barbara's own staff report summarizing the Project Description for the RDEIR (dated August 25, 2016) also references "new or *relocated* parking spaces" (emphasis added), suggesting the removal of parking north of Hollister Avenue is necessarily part of the Project. As such, the auxiliary lot should be included in the Master Plan area and the future use of that parking lot and impacts associated with that future use must be included in the FEIR. GOL-81

Further discussion and analysis of future use must also be done for the current Maintenance Yard that is planned to be relocated. The moving of the Maintenance Yard frees up this area as new leasable space. This is not discussed in the RDEIR except for a brief reference to the future use of existing buildings within the old maintenance yard as part of Impact HYD-2. The overall impacts associated with the addition of this leasable space must be considered in the FEIR. GOL-82

Biological Resources

As stated in the City's comment on the DEIR, the loss to wetland habitat (Impact BIO-1) is incorrectly identified as a Class II impact. This must be identified as a Class I impact to reflect loss of protected habitat. The RDEIR relies on the Programmatic Wetland Restoration Plan (PWRP) to mitigate the destruction of wetlands. There is no justification for the assumption that this mitigation can reduce Impact BIO-1 to less than a Class I impact. Restoration efforts to offset the destruction of wetlands are critical. However, restoration cannot mitigate a Class I impact as restoration work cannot ensure successful mitigation and cannot ensure wetlands of equal ecological and biological value can be produced. The conclusion for Impact BIO-1 that "the project would not result in the 'elimination, substantial reduction, or disruption of important natural vegetative communities, wildlife habitat, migration corridors, or habitat supporting sensitive species…' after mitigation" (RDEIR, 4-36) is incorrect, speculative, and unsupported by the RDEIR. GOL-83

Wetland mitigation Areas 3 and 4 comprise the significant majority of potential wetland mitigation area on-site and lie directly next to runways and taxiways. The City is concerned about the potential conflict in using these areas for mitigation with Appendix B in the RDEIR, the *Santa Barbara Airport Wildlife Hazard Assessment* (*Hazards Assessment*). BIO/mm-1 requires the wetland restoration in the PWRP "be consistent with…the Wildlife Hazard Management Plan" (RDEIR, 4-40) and that "[t]he Airport shall comply with the conditions and recommendation of existing guiding documents as well as those under development (i.e., Wildlife Hazard Assessment for the Airport…)" (RDEIR, 4-41). The *Hazards Assessment* discusses the Airport Master Plan and potential wetland mitigation in the following way:

> [The] Master Plan…will provide "development scenarios for the short-term (2017), intermediate-term (2022), and long-term (2032)" (City 2015)…Some developments may require mitigation, including mitigation of wetlands under the jurisdiction of the California Coastal Commission. Potential wildlife hazards will be considered in the selection of new mitigation lands, so that any restoration of mitigation lands will not result in an elevated wildlife hazard level. However, the presence of additional lands set aside as mitigation in perpetuity could further restrict SBA's ability to manage wildlife hazards on site. (RDEIR, B-22)

The FEIR must at a minimum discuss how Areas 3 and 4 are appropriate locations for wetlands and how these areas are or are not consistent with the *Hazards Assessment* and other existing guiding documents. If these sites are not consistent, the FEIR must disclose and discuss these inconsistencies.

GOL-84

With respect to the mitigation ratio for wetland impacts proposed for the PWRP in BIO/mm-1, the City does not believe the 2:1 ratio is adequate to mitigate wetland impacts. The RDEIR notes the Santa Barbara Airport and Goleta Slough Local Coastal Program Policy C-11 required a 4:1 mitigation ratio for the Runway Safety Projects. This 4:1 mitigation was also included in the Runway Safety Projects' CDP (CDP 4-03-082). For the Airport Drainage Project, the City of Santa Barbara proposed a 6:1 mitigation ratio for seasonal wetlands. It is unclear why the City of Santa Barbara is now proposing a 2:1 mitigation ratio when appropriately higher mitigation ratios were utilized for previous runway projects and when the RDEIR itself acknowledges in the discussion of Impact BIO-1 that a 4:1 mitigation ratio similar to the Runway Safety Projects will likely be necessary (RDEIR, 4-34). This inconsistency must be remedied. A fixed 4:1 mitigation ratio must be established and truly feasible sites for the 4:1 wetland mitigation ratio must be identified in the FEIR.

GOL-85

Land Use and Planning

Based on the significant discretionary actions by other agencies, LU/mm-1 and LU/mm-3 cannot be used to mitigate Impacts LU-4 and LU-6 to Class II, Less than Significant Impacts with Mitigation. As such, Impacts LU-4 and LU-6 should be identified as Class I impacts.

GOL-86

CITY OF GOLETA 130 Cremona Drive, Suite B, Goleta, CA 93117 P 805.961.7500 F 805.685.2635 www.cityofgoleta.org

The City of Santa Barbara acknowledges that "[b]ased on a preliminary Local Coastal Program (LCP) policy conformance analysis completed as part of this Program EIR, the City will also consider the initiation of an LCP amendment, a City of Santa Barbara General Plan amendment, and a rezone for the portion of a future Taxiway H Airfield Safety Project that would occur within the GSER." (RDEIR, 2-7). The LCP amendment, General Plan amendment, and rezone are necessary for the Project to remain consistent with the Airport's Local Coastal Program (Impact LU-4) and the City of Santa Barbara's General Plan, G-S-R zone, and Goleta Slough Ecological Reserve (GSER) (Impact LU-6). The RDEIR relies on LU/mm-1 to mitigate inconsistencies with the Airport's LCP and the G-S-R zone designation and LU/mm-3 to mitigate the Project's inconsistencies with the GSER boundary.

The reliance on LU/mm-1 to mitigate Impact LU-4 from a Class I to a Class II impact is unjustified as any change to LCP policies or zoning designations requires certification by the California Coastal Commission. Since this action is out of the control of the City of Santa Barbara, the mitigation measure proposed is insufficient to mitigate the impact to Less than Significant with Mitigation (Class II). As such, Impact LU-4 is a Class I impact.

GOL-86 (cont'd)

The same issue arises with LU/mm-3. Any change to the GSER boundary requires action by the California Department of Fish and Wildlife (CDFW). Since this action is outside the control of the City of Santa Barbara, the mitigation measure proposed is insufficient to mitigate the impact to Less than Significant with Mitigation (Class II). Additionally, the assumption that LU/mm-3 can reduce Impact LU-6 to Class II is troubling because in the last instance where the Santa Barbara Airport needed a change in the GSER boundary, this change never actually took place. Furthermore, there is no indication that there is adequate land to support a change in the GSER boundary. As such, Impact LU-6 must be considered a Class I impact.

Transportation/Traffic

Future Baseline

As previously stated in our DEIR comment letter, the City is concerned for the use of a future baseline that includes increased future enplanements even though the Project includes increased parking and a terminal expansion.

GOL-87

The RDEIR explains in several places that "the City's General Plan considers 'moderate growth' at the Airport that was based on the 2003 *Aviation Facilities Plan*'s aviation demand forecast" (RDEIR, 2-2). The City of Santa Barbara's General Plan Final EIR does not independently analyze Airport traffic impacts on local intersections. Instead, Santa Barbara's General Plan Final EIR points to the City of Goleta's 2006 General Plan EIR for "details on methodology, assumptions and mitigations for these intersections." (City of Santa Barbara September 2010 General Plan Certified Final EIR).

GOL-88

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The City of Santa Barbara did address traffic impacts associated with growth at the Airport in the Final EIR for the 2003 Aviation Facilities Plan. Mitigation Measure 3.23-1 states that "[t]he Airport will contribute a fair-share payment toward local improvements to accommodate future traffic growth" and Mitigation Measure 3.23-2 states that "[t]he Airport will contribute a fair-share payment toward regional improvements to accommodate future traffic growth." For both mitigation measures, the compliance timing was "[w]ithin six months of adoption of the Facilities Plan" and the method was that a "reciprocal funding agreement shall be adopted by both the City and the County." (Aviation Facilities Plan Mitigation; Monitoring Program; Airline Terminal Expansion, Parking Structure, Air Cargo Building, and Taxiway B Improvements; page 8 of 10).

GOL-89

Although the Final EIR for the Aviation Facilities Plan is dated August 2002, there is no mention in these above referenced mitigation measures to include the City of Goleta in a funding agreement even though the impacts considered fell within the City of Goleta. As such, the traffic impacts within the City of Goleta associated with the ongoing growth of the Airport do not appear as though they have ever been addressed. The City is concerned that the approach used in the RDEIR continues this pattern. The City requests further detail in the FEIR outlining how traffic impacts associated with growth at the Airport were mitigated pursuant to the mitigation measures described above as the Airport has continued to expand over time.

Traffic Impact Study

The City appreciates the time and effort taken to update the DEIR Traffic Impact Study (Appendix C) in the RDEIR. However, the City remains concerned about the use of a 1900 saturation flow rate for the intersections of Hollister Avenue and the State Route 217 Westbound Ramp and Hollister Avenue and the State Route 217 Eastbound Ramp. The Study should explain why a saturation flow rate of 1900 rather than 1600 was used. A saturation flow rate of 1600 may change the Project's impact on these intersections.

GOL-90

Mitigation Measure T/mm-1

The City appreciates the addition of T/mm-1 (fair share contribution for traffic mitigation) in the RDEIR to mitigate traffic impacts associated with the Project. However, the details and timing of this mitigation measure must be changed. A more thorough explanation of the fair share contribution should be described, including to the Goleta Transportation Improvement Program and for future projects along the Fairview and Hollister Avenue corridors, to help clarify what the expectations included in this mitigation measure really are. Additionally, the Implementation Schedule for T/mm-1 is listed as "[w]hen, and if, traffic improvements within the City of Goleta are constructed." (RDEIR, 7-12). The City believes a more complete mitigation measure will require the City of Santa Barbara to enter into an agreement with the City of Goleta, like that envisioned in the Aviation Facilities Plan FEIR. This agreement must be in place prior to the adoption of the Airport Master Plan to ensure that an appropriate agreement is in place prior to the implementation of the Master Plan.

GOL-91

GOL-92

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Thank you for considering the City staff's comments regarding the RDEIR. If you have any questions regarding our comments, do not hesitate to contact me at 805-961-7557.

Sincerely,

Anne Wells

Anne Wells
Advance Planning Manager

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

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Response to Recirculated Draft Program EIR - Letter 13
City of Goleta (GOL)
Dated September 13, 2016

*GOL-1 through GOL-78 are included in **Appendix A** of this Final Program EIR.*

GOL-79: This comment states that this letter is focused on additional issues that the City has with the Recirculated Draft Program EIR and does not restate all issues listed in its letter on the Draft Program EIR (dated October 30, 2015).

Response: Comment noted.

GOL-80: This comment states that the Project Objectives are too narrowly constructed and that they are just the Project components, not overarching goals for the Project. The comment also states that other potential Master Plan designs are inadequately identified.

Response: This comment restates comments from the City of Goleta's previous letter. Refer to Comments and Responses to Comments GOL-11 through GOL-13, and GOL-28 of **Appendix A** (Final Program EIR). The overarching goal of the proposed project is to plan for the safe and efficient use of the Airport, which is mandated by Federal regulations. Specifically, the Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5300-13A, *Airport Design* (FAA 2014) states in Section 101c, Existing Airports, "Every effort shall be made to bring an airport up to current standards." In addition, Federal Grant Assurance No. 19, requires that the Airport be operated in "a safe and serviceable condition and in accordance with the minimum standards as may be required or prescribed by applicable Federal, state and local agencies for maintenance and operation. It will not cause or permit any activity or action thereon which would interfere with its use for airport purposes."

The proposed Master Plan is a detailed comprehensive document that followed FAA guidelines (AC 150-5070-6B, Change 1, *Consolidated Master Plans* [FAA 2007]). It is incorporated by reference into the Program EIR and contains detailed alternatives analysis. It must be noted that airport design is strictly controlled by FAA and must follow prescribed airfield geometry and safety standards with site constraints and FAA design criteria; feasible design strategies are limited.

GOL-81: This comment states that a closed auxiliary parking lot north of Hollister Avenue (Lot 2) was originally included in the proposed Airport Master Plan and Draft Program EIR and should remain in the Final Program EIR and its reuse analyzed as part of the Master Plan. The

rationale for this comment is that the proposed Master Plan includes reference to the "consolidation of automobile parking associated with the Terminal."

Response: The referenced parking lot has been closed for some time and its closure is not part of the proposed Airport Master Plan. As requested by the City of Goleta in their prior letter, the parking lot has been removed from the discussion. The "consolidation of automobile parking" listed in the proposed Master Plan describes the areas identified for future vehicular parking needs at the Terminal. Any future uses of the former lot north of Hollister Avenue will continue to be guided by the *Santa Barbara Airport Industrial Area Specific Plan* (1997).

GOL-82: This comment states that relocation of the current maintenance yard to another part of the Airport frees up leasable space, which is not discussed in the Recirculated Draft Program EIR.

Response: This comment restates comments from the City of Goleta's previous letter. Refer to Comment and Response to Comment GOL-30 of **Appendix A** (Final Program EIR). The existing buildings at the current maintenance yard could continue to be leased for other uses consistent with the area's zoning and land use designation. Future redevelopment of the area will occur consistent with the existing land use plan (i.e., the *Santa Barbara Airport Industrial Area Specific Plan*). See also Section 4.6.4, Project-Specific Impacts (Impact LU-3). Note that the Goleta traffic model assumes that this entire area of the Airport is developed as Light Industrial.

GOL-83: This comment states that potential impacts to the loss of wetland habitat (Impact BIO-1) should be considered Class I and that the Program EIR cannot rely on a Programmatic Mitigation Plan (PMP) for mitigation. The comment also states that restoration efforts cannot ensure successful mitigation or ensure that wetlands of equal ecological and biological value can be produced.

Response: See Topical Response #2. BIO/mm-1 (i.e., the PMP) has been refined to include additional measures based on input from the California Department of Fish and Wildlife (CDFW), California Coastal Commission (CCC), and other resource agencies, advisory groups, and stakeholders of the Goleta Slough. One of the key features of the PMP is the requirement that future Airport projects that could affect protected biological resources prepare Habitat Mitigation and Monitoring Plans (HMMPs). The HMMPs must be reviewed by the appropriate resource agencies to ensure that impacts to protected biological resources will be successfully mitigated. General performance criteria have also been included in BIO/mm-1.

GOL-84: This comment states the commenter's concern with specific biological mitigation areas (referred to as Areas 6 and 7 in the Final Program EIR, see Exhibit 4D) and consistency with the Airport's Wildlife Hazard Assessment.

Response: See Topical Response #2. These two areas are outside the current Goleta Slough Ecological Reserve (GSER) boundaries and are specifically called out in the Airport's Local Coastal Plan (LCP) as potential mitigation areas for future Airport development projects (City of Santa Barbara 2003:3-11):

> "Twenty-one acres in the south west corner of the intersection of the east/west and north/south runways are designated as potentially restorable marsh on the habitat map. During an informal site investigation with the Department of Fish and Game and Coastal Commission staff members in spring 1981, this portion of the slough was observed as upland habitat. Since the informal site visit, detailed habitat mapping of the slough has been completed (as shown on the special study area on the habitat map) however this area in the corner of the runways was not included in that habitat mapping. There has been no documentation that this area is anything other than potentially restorable marsh. Therefore, this area will be considered potentially restorable marsh so that it may possibly be restored or improved to offset impacts of development in other sections of the City's Airport property in the future."

The location of the Airport in proximity to the Goleta Slough is a unique situation that requires the balancing of airport safety and the protection of, and coexistence with, the resources and wildlife within the Slough. In general, wildlife is discouraged from the Air Operations Area (AOA) (i.e., all airport areas where aircraft can operate, either under their own power or while in tow, such as runways, taxiways, and apron areas). In this aspect, swapping a GSER area that is between the runway system and the other areas of the AOA (for example, the Taxiway H Airfield Safety Project area) with an area outside the AOA and on the same side of the airfield as the remainder of the Slough is highly preferred from a wildlife hazard management perspective. By providing protected areas southwest of the airfield, birds can be encouraged to remain in the Slough rather that traversing across the airfield to get to it.

GOL-85: This comment identifies concerns with the previously identified minimum mitigation ratios for future project-specific wetland impacts and states that feasible mitigation sites must be provided.

Response: See Topical Response #2 and Response to Comment GOL-83. The CCC has stated that habitat mitigation ratios for the potential Taxiway H Airfield Safety Project should be increased to a minimum ratio of 4:1 for unavoidable wetland habitats and 3:1 for upland habitat impacts. (Refer to Letter 11 of this appendix, Comment CCC-2.) In addition, the CDFW has indicated a need to mitigate for both wetland and upland areas. (Refer to Letter 9 of this appendix, CDFW-50). BIO/mm-1 has been refined to reflect this additional resource agency input.

GOL-86: This comment states that requiring significant discretionary actions by other agencies cannot be used to mitigate impacts related to Impact LU-4 (Compatibility with the Airport's Local Coastal Program) and Impact LU-6 (Inconsistencies with City of Santa Barbara General Plan and Zoning).

Response: Future individual projects to implement the Master Plan will require specific design, environmental review, and permit approvals. At the programmatic level of this EIR, it is appropriate to identify conditions on future project approvals as mitigation.

GOL-87: This comment identifies concerns over the future baseline used in identifying cumulative traffic impacts. This baseline incorporates future enplanements at the Airport that are part of the FAA-approved forecasts for the Airport.

Response: The proposed Airport Master Plan is based on FAA-approved forecasts, which use national and regional trends in aviation growth. While the forecasts may or may not be realized within the planning horizons of the proposed Master Plan (i.e., 20 years), they allow the Airport to formulate a capital improvement plan to meet the potential demand. As with any capital improvement plan, it will be adjusted to reflect actual need, typically on an annual basis. Capital improvements that are not related to safety, such as a larger terminal, will not be carried out unless actual demand is realized. Thus, while the proposed Airport Master Plan reserves space for future terminal expansion and vehicle parking if future airport activity justifies it, these types of improvements do not drive enplanement levels, but respond to them.

Traffic resulting from future Airport activity levels are not created by an Airport's Master Plan, but by the capacity of the airfield in concert with market factors. These will occur in both the No Project and Proposed Plan alternatives and are correctly included in the cumulative baseline traffic scenario. This approach is also used by the City of Goleta as future Airport activity and is incorporated into its citywide cumulative traffic model.

GOL-88: This comment states that the City's General Plan EIR does not independently analyze Airport traffic impacts (defined as "moderate" growth, i.e., one to four percent annual growth in enplanements and two percent annual growth in general aviation operations - Recirculated Draft Program EIR, page 2-2) on local intersections, but relied on the City of Goleta's 2006 General Plan EIR.

Response: Comment noted.

GOL-89: This comment identifies previous mitigation measures included in the previous Airport Facilities Plan Final EIR (2002) with respect to cumulative traffic and states that the City of Goleta was not mentioned, but only the City of Santa Barbara and Santa Barbara County. Additional detail is requested about how traffic effects associated with Airport growth have been mitigated.

Response: The 2003 Aviation Facilities Plan was based on annual enplaned passengers of 399,347 in 2000 and an assumed growth rate of 1.37 percent over the 2000-2010 decade. The Aviation

Facilities Plan excluded development along Hollister Avenue and focused exclusively on the airfield, Goleta, Slough and the south (Terminal) area. The anticipated growth of approximately 179,000 annual enplanements (or 358,000 additional passengers) did not occur, however. The 2016 Terminal Area Forecast (TAF) prepared by the Federal Aviation Administration (FAA) forecasts 323,859 annual enplanements for 2017 based on 317,882 actual annual enplanements tallied in 2015. Applying the Airport Master Plan assumed growth rate of 2.3 percent, the Santa Barbara Airport would return to year 2000 annual enplanements in 2026.

Condition J.15 of the Coastal Development Permit and Development Plan for the Airline Terminal Expansion Project in 2007 implemented Aviation Facilities Plan EIR Mitigation Measure 3.23-2 obligating the Airport to make a fair share contribution to intersections identified in the Traffic Study for that project. The Cities of Goleta and Santa Barbara were not able to come to an agreement on the method and timing of such payments. However, because significant contributions to cumulative traffic impacts associated with implementation of the Aviation Facilities Plan never materialized, no off-site traffic mitigation was required.

GOL-90: This comment is concerned with the use of a saturation flow rate[1] of 1900 rather than 1600 for the assessment of impacts to the intersections of Hollister Avenue and the SR 217 eastbound and westbound ramps.

Response: Evaluation of future impacts to these two intersections (intermediate and long term) assume that the intersections have been converted to roundabouts in keeping with the City of Goleta's 2006 General Plan and Project Goleta website. Thus, these intersections were analyzed in the Traffic Impact Study using the HCM 2010 traffic signal delay parameters in Sidra 6 software and no changes to the analysis are necessary.

Using a 1600 saturation flow rate for the existing condition, the levels of service are shown below. Table 4L in the Final Program EIR has been updated to reflect these values. The TRAFFIX print-outs are attached to the end of these responses for your reference.

[1] A saturation flow rate is the maximum number of vehicles from a specified travel lane that could theoretically pass through the intersection during one hour of continuous green under the prevailing traffic and roadway conditions.

COMPARISON OF EXISTING INTERSECTION CONDITIONS FOR HOLLISTER AVENUE/STATE ROUTE (SR) 217 RAMPS BASED ON SATURATION FLOW RATES

EXISTING	AM Peak-hour (1900 saturation flow rate) VC/(LOS)	AM Peak-hour (1600 saturation flow rate) VC/(LOS)	PM Peak-hour (1900 saturation flow rate) VC/(LOS)	PM Peak-hour (1600 saturation flow rate) VC/(LOS)
#10 SR 217 westbound/Hollister	0.537 (A)	0.573 (A)	0.662 (B)	0.739 (C)
#11 SR 217 eastbound/Hollister	0.312 (A)	0.414 (A)	0.496 (A)	0.583 (A)

Source: Kimley-Horn and Associates, Additional Traffic Analysis, October 2016.
V/C = volume to capacity ratio
LOS = level of service

GOL-91: This comment states with respect to T/mm-1 that a more thorough explanation of the "fair share" contribution should be described, including to the Goleta Transportation Improvement Program and for future projects along the Fairview and Hollister Avenue corridors.

Response: T/mm-1 has been revised in the Final Program EIR to state that all development at the Airport will contribute an equitable share cost allocation for afternoon peak-hour trips added to the Hollister Avenue/Kellogg Avenue intersection and to the Fairview Avenue/US 101 NB ramps. Equitable share shall be calculated using the most recent cost for the improvement programmed for these intersections in the Goleta Transportation Improvement Plan (GTIP), and shall be based upon a traffic study prepared pursuant to the City of Santa Barbara Traffic Management Strategy for the Airport Area, including consultation and coordination with the City of Goleta.

GOL-92: This comment states with respect to T/mm-1 that the Implementation Schedule must be set before the proposed Airport Master Plan is approved, rather than when, and if, traffic improvements within the City of Goleta are constructed.

Response: The Final Program EIR's Mitigation Monitoring and Reporting Program (Chapter 7) has been revised to stipulate that T/mm-1 will be implemented prior to project approval for projects contributing to cumulative impacts to the Hollister Avenue/Kellogg Avenue intersection and to the Fairview Avenue/US 101 NB ramps. See also Exhibit 2G of this Final Program EIR for the most recent Master Plan Capital Improvement Plan, which identifies the anticipated implementation of various Master Plan recommendations.

SANTA BARBARA AIRPORT MASTER PLAN
EXISTING CONDITIONS

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #10 SR 217 WB Ramps/Hollister Ave

Cycle (sec):	100	Critical Vol./Cap.(X):	0.537
Loss Time (sec):	10	Average Delay (sec/veh):	22.9
Optimal Cycle:	39	Level Of Service:	C

Street Name:	SR 217 WB Ramps						Hollister Ave					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Split Phase			Split Phase			Permitted			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	0	0	0	0	0	1! 0	1	0	0	1	0	1
Volume Module:												
Base Vol:	0	0	0	154	0	519	0	601	47	96	426	0
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	0	0	0	154	0	519	0	601	47	96	426	0
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	0	0	0	154	0	519	0	601	47	96	426	0
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	0	0	0	154	0	519	0	601	47	96	426	0
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	0	0	0	154	0	519	0	601	47	96	426	0
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	1.00	1.00	1.00	0.87	1.00	0.87	1.00	0.94	0.94	0.95	0.95	1.00
Lanes:	0.00	0.00	0.00	0.37	0.00	1.63	0.00	1.85	0.15	1.00	2.00	0.00
Final Sat.:	0	0	0	619	0	2704	0	3311	259	1805	3610	0
Capacity Analysis Module:												
Vol/Sat:	0.00	0.00	0.00	0.25	0.00	0.19	0.00	0.18	0.18	0.05	0.12	0.00
Crit Moves:				****				****		****		
Green/Cycle:	0.00	0.00	0.00	0.46	0.00	0.46	0.00	0.34	0.34	0.10	0.44	0.00
Volume/Cap:	0.00	0.00	0.00	0.54	0.00	0.41	0.00	0.54	0.54	0.54	0.27	0.00
Delay/Veh:	0.0	0.0	0.0	19.6	0.0	18.0	0.0	27.3	27.3	46.1	18.1	0.0
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	0.0	0.0	0.0	19.6	0.0	18.0	0.0	27.3	27.3	46.1	18.1	0.0
LOS by Move:	A	A	A	B	A	B	A	C	C	D	B	A
HCM2kAvgQ:	0	0	0	9	0	7	0	8	8	3	4	0

Note: Queue reported is the number of cars per lane.

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SANTA BARBARA AIRPORT MASTER PLAN
EXISTING CONDITIONS

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #11 SR 217 EB Ramps/Hollister Ave

Cycle (sec):	100	Critical Vol./Cap.(X):	0.312
Loss Time (sec):	10	Average Delay (sec/veh):	20.9
Optimal Cycle:	28	Level Of Service:	C

Street Name:	SR 217 EB Ramps						Hollister Ave					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Split Phase			Split Phase			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	0 1	0	0 1	0 0	0	0 0	2	0 1	1 0	1	0 2	0 1
Volume Module:												
Base Vol:	48	53	44	0	0	0	317	310	135	70	486	83
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	48	53	44	0	0	0	317	310	135	70	486	83
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	48	53	44	0	0	0	317	310	135	70	486	83
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	48	53	44	0	0	0	317	310	135	70	486	83
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	48	53	44	0	0	0	317	310	135	70	486	83
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.95	0.95	0.85	1.00	1.00	1.00	0.92	0.91	0.91	0.95	0.95	0.85
Lanes:	0.48	0.52	1.00	0.00	0.00	0.00	2.00	1.39	0.61	1.00	2.00	1.00
Final Sat.:	858	947	1615	0	0	0	3502	2402	1046	1805	3610	1615
Capacity Analysis Module:												
Vol/Sat:	0.06	0.06	0.03	0.00	0.00	0.00	0.09	0.13	0.13	0.04	0.13	0.05
Crit Moves:	****						****				****	
Green/Cycle:	0.18	0.18	0.18	0.00	0.00	0.00	0.29	0.55	0.55	0.17	0.43	0.43
Volume/Cap:	0.31	0.31	0.15	0.00	0.00	0.00	0.31	0.23	0.23	0.23	0.31	0.12
Delay/Veh:	36.2	36.2	34.9	0.0	0.0	0.0	27.9	11.5	11.5	36.5	18.8	17.1
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	36.2	36.2	34.9	0.0	0.0	0.0	27.9	11.5	11.5	36.5	18.8	17.1
LOS by Move:	D	D	C	A	A	A	C	B	B	D	B	B
HCM2kAvgQ:	3	3	1	0	0	0	4	4	4	2	5	2

Note: Queue reported is the number of cars per lane.

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SANTA BARBARA AIRPORT MASTER PLAN
EXISTING CONDITIONS

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #10 SR 217 WB Ramps/Hollister Ave

Cycle (sec):	100	Critical Vol./Cap.(X):	0.662
Loss Time (sec):	10	Average Delay (sec/veh):	18.0
Optimal Cycle:	49	Level Of Service:	B

Street Name:	SR 217 WB Ramps						Hollister Ave					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Split Phase			Split Phase			Permitted			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	0 0	0	0 0	0 0	1! 0	1	0 0	1	1 0	1 0	2	0 0
Volume Module:												
Base Vol:	0	0	0	48	0	433	0	1402	31	70	512	0
Growth Adj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
Initial Bse:	0	0	0	48	0	433	0	1402	31	70	512	0
User Adj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
PHF Adj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
PHF Volume:	0	0	0	48	0	433	0	1402	31	70	512	0
Reduct Vol:	0	0	0	0	0	0	0	0	9	0	0	0
Reduced Vol:	0	0	0	48	0	433	0	1402	22	70	512	0
PCE Adj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
MLF Adj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
FinalVolume:	0	0	0	48	0	433	0	1402	22	70	512	0
Saturation Flow Module:												
Sat/Lane:	**1900 1900**		**1900**	**1900 1900**		**1900**	**1900 1900**		**1900**	**1900 1900**		**1900**
Adjustment:	1.00 1.00	1.00		0.86 1.00	0.86		1.00 0.95	0.95		0.95 0.95	1.00	
Lanes:	0.00 0.00	0.00		0.18 0.00	1.82		0.00 1.97	0.03		1.00 2.00	0.00	
Final Sat.:	0	0	0	297	0	2974	0	3547	56	1805	3610	0
Capacity Analysis Module:												
Vol/Sat:	0.00 0.00	0.00		0.16 0.00	0.15		0.00 0.40	0.40		0.04 0.14	0.00	
Crit Moves:				****				****		****		
Green/Cycle:	0.00 0.00	0.00		0.24 0.00	0.24		0.00 0.60	0.60		0.06 0.66	0.00	
Volume/Cap:	0.00 0.00	0.00		0.66 0.00	0.60		0.00 0.66	0.66		0.66 0.22	0.00	
Delay/Veh:	0.0 0.0	0.0		36.4 0.0	34.6		0.0 14.2	14.2		60.7 7.0	0.0	
User DelAdj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
AdjDel/Veh:	0.0 0.0	0.0		36.4 0.0	34.6		0.0 14.2	14.2		60.7 7.0	0.0	
LOS by Move:	A	A	A	D	A	C	A	B	B	E	A	A
HCM2kAvgQ:	0	0	0	8	0	7	0	15	15	2	3	0

Note: Queue reported is the number of cars per lane.

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SANTA BARBARA AIRPORT MASTER PLAN
EXISTING CONDITIONS

Level Of Service Computation Report
2000 HCM Operations Method (Base Volume Alternative)

Intersection #11 SR 217 EB Ramps/Hollister Ave

Cycle (sec):	100	Critical Vol./Cap.(X):	0.496
Loss Time (sec):	10	Average Delay (sec/veh):	22.0
Optimal Cycle:	36	Level Of Service:	C

Street Name:	SR 217 EB Ramps						Hollister Ave					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L - T - R			L - T - R			L - T - R			L - T - R		
Control:	Split Phase			Split Phase			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	0	1 0	0 1	0	0 0	0 0	2	0 1	1 0	1	0 2	0 1
Volume Module:												
Base Vol:	113	94	235	0	0	0	428	960	65	26	461	63
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	113	94	235	0	0	0	428	960	65	26	461	63
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	113	94	235	0	0	0	428	960	65	26	461	63
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	113	94	235	0	0	0	428	960	65	26	461	63
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	113	94	235	0	0	0	428	960	65	26	461	63
Saturation Flow Module:												
Sat/Lane:	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adjustment:	0.96	0.96	0.85	1.00	1.00	1.00	0.92	0.94	0.94	0.95	0.95	0.85
Lanes:	0.55	0.45	1.00	0.00	0.00	0.00	2.00	1.87	0.13	1.00	2.00	1.00
Final Sat.:	998	830	1615	0	0	0	3502	3351	227	1805	3610	1615
Capacity Analysis Module:												
Vol/Sat:	0.11	0.11	0.15	0.00	0.00	0.00	0.12	0.29	0.29	0.01	0.13	0.04
Crit Moves:			****					****		****		
Green/Cycle:	0.29	0.29	0.29	0.00	0.00	0.00	0.30	0.58	0.58	0.03	0.31	0.31
Volume/Cap:	0.39	0.39	0.50	0.00	0.00	0.00	0.41	0.50	0.50	0.50	0.41	0.13
Delay/Veh:	28.6	28.6	30.0	0.0	0.0	0.0	28.4	12.7	12.7	55.0	27.5	24.9
User DelAdj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
AdjDel/Veh:	28.6	28.6	30.0	0.0	0.0	0.0	28.4	12.7	12.7	55.0	27.5	24.9
LOS by Move:	C	C	C	A	A	A	C	B	B	E	C	C
HCM2kAvgQ:	5	5	6	0	0	0	5	9	9	2	6	1

Note: Queue reported is the number of cars per lane.

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SANTA BARBARA AIRPORT MASTER PLAN
EXISTING CONDITIONS

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Base Volume Alternative)

Intersection #10 SR 217 WB Ramps/Hollister Ave

Cycle (sec):	100	Critical Vol./Cap.(X):	0.573
Loss Time (sec):	10	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	38	Level Of Service:	A

Street Name:	SR 217 WB Ramps								Hollister Ave							
Approach:	North Bound				South Bound				East Bound				West Bound			
Movement:	L	-	T	-	R	L	-	T	-	R	L	-	T	-	R	L	-	T	-	R
Control:	Split Phase					Split Phase					Permitted					Protected				
Rights:	Include					Include					Include					Include				
Min. Green:	0	0	0			0	0	0			0	0	0			0	0	0		
Y+R:	4.0	4.0	4.0			4.0	4.0	4.0			4.0	4.0	4.0			4.0	4.0	4.0		
Lanes:	0	0	0	0	0	0	0	1!	0	1	0	0	1	1	0	1	0	2	0	0
Volume Module:																				
Base Vol:	0	0	0			154	0	519			0	601				47	96	426		0
Growth Adj:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00				1.00	1.00	1.00		1.00
Initial Bse:	0	0	0			154	0	519			0	601				47	96	426		0
User Adj:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00				1.00	1.00	1.00		1.00
PHF Adj:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00				1.00	1.00	1.00		1.00
PHF Volume:	0	0	0			154	0	519			0	601				47	96	426		0
Reduct Vol:	0	0	0			0	0	0			0	0				0	0	0		0
Reduced Vol:	0	0	0			154	0	519			0	601				47	96	426		0
PCE Adj:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00				1.00	1.00	1.00		1.00
MLF Adj:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00				1.00	1.00	1.00		1.00
FinalVolume:	0	0	0			154	0	519			0	601				47	96	426		0
Saturation Flow Module:																				
Sat/Lane:	1600	1600	1600			1600	1600	1600			1600	1600	1600			1600	1600	1600		1600
Adjustment:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00				1.00	1.00	1.00		1.00
Lanes:	0.00	0.00	0.00			0.46	0.00	1.54			0.00	1.85				0.15	1.00	2.00		0.00
Final Sat.:	0	0	0			732	0	2468			0	2968				232	1600	3200		0
Capacity Analysis Module:																				
Vol/Sat:	0.00	0.00	0.00			0.21	0.00	0.21			0.00	0.20				0.20	0.06	0.13		0.00
Crit Moves:						****						****					****			

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SANTA BARBARA AIRPORT MASTER PLAN
EXISTING CONDITIONS

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Base Volume Alternative)

Intersection #11 SR 217 EB Ramps/Hollister Ave

Cycle (sec):	100	Critical Vol./Cap.(X):	0.414
Loss Time (sec):	10	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	29	Level Of Service:	A

Street Name:	SR 217 EB Ramps						Hollister Ave					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Split Phase			Split Phase			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	0 1	0	0 1	0 0	0	0 0	2 0	1	1 0	1 0	2	0 1
Volume Module:												
Base Vol:	48	53	44	0	0	0	317	310	135	70	486	83
Growth Adj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
Initial Bse:	48	53	44	0	0	0	317	310	135	70	486	83
User Adj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
PHF Adj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
PHF Volume:	48	53	44	0	0	0	317	310	135	70	486	83
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	48	53	44	0	0	0	317	310	135	70	486	83
PCE Adj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
MLF Adj:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
FinalVolume:	48	53	44	0	0	0	317	310	135	70	486	83
Saturation Flow Module:												
Sat/Lane:	1600 1600	1600		1600 1600	1600		1600 1600	1600		1600 1600	1600	
Adjustment:	1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00		1.00 1.00	1.00	
Lanes:	0.48 0.52	1.00		0.00 0.00	0.00		2.00 1.39	0.61		1.00 2.00	1.00	
Final Sat.:	760	840	1600	0	0	0	3200	2229	971	1600	3200	1600
Capacity Analysis Module:												
Vol/Sat:	0.06 0.06	0.03		0.00 0.00	0.00		0.10 0.14	0.14		0.04 0.15	0.05	
Crit Moves:	****						****				****	

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SANTA BARBARA AIRPORT MASTER PLAN
EXISTING CONDITIONS

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Base Volume Alternative)

Intersection #10 SR 217 WB Ramps/Hollister Ave

Cycle (sec):	100	Critical Vol./Cap.(X):	0.739
Loss Time (sec):	10	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	55	Level Of Service:	C

Street Name:	SR 217 WB Ramps								Hollister Ave							
Approach:	North Bound				South Bound				East Bound				West Bound			
Movement:	L	-	T	-	R	L	-	T	-	R	L	-	T	-	R	L	-	T	-	R
Control:	Split Phase				Split Phase				Permitted				Protected			
Rights:	Include				Include				Include				Include			
Min. Green:	0	0	0		0	0	0		0	0	0		0	0	0	
Y+R:	4.0	4.0	4.0		4.0	4.0	4.0		4.0	4.0	4.0		4.0	4.0	4.0	
Lanes:	0	0	0	0	0	0	0	1!	0	1	0	0	1	1	0	1	0	2	0	0
Volume Module:																
Base Vol:	0	0	0			48	0	433			0	1402			31	70	512			0
Growth Adj:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00			1.00	1.00	1.00			1.00
Initial Bse:	0	0	0			48	0	433			0	1402			31	70	512			0
User Adj:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00			1.00	1.00	1.00			1.00
PHF Adj:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00			1.00	1.00	1.00			1.00
PHF Volume:	0	0	0			48	0	433			0	1402			31	70	512			0
Reduct Vol:	0	0	0			0	0	0			0	0			9	0	0			0
Reduced Vol:	0	0	0			48	0	433			0	1402			22	70	512			0
PCE Adj:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00			1.00	1.00	1.00			1.00
MLF Adj:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00			1.00	1.00	1.00			1.00
FinalVolume:	0	0	0			48	0	433			0	1402			22	70	512			0
Saturation Flow Module:																
Sat/Lane:	1600	1600	1600			1600	1600	1600			1600	1600			1600	1600	1600			1600
Adjustment:	1.00	1.00	1.00			1.00	1.00	1.00			1.00	1.00			1.00	1.00	1.00			1.00
Lanes:	0.00	0.00	0.00			0.20	0.00	1.80			0.00	1.97			0.03	1.00	2.00			0.00
Final Sat.:	0	0	0			319	0	2881			0	3151			49	1600	3200			0
Capacity Analysis Module:																
Vol/Sat:	0.00	0.00	0.00			0.15	0.00	0.15			0.00	0.44			0.45	0.04	0.16			0.00
Crit Moves:								****							****	****				

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SANTA BARBARA AIRPORT MASTER PLAN
EXISTING CONDITIONS

Level Of Service Computation Report
ICU 1(Loss as Cycle Length %) Method (Base Volume Alternative)

Intersection #11 SR 217 EB Ramps/Hollister Ave

Cycle (sec):	100	Critical Vol./Cap.(X):	0.583
Loss Time (sec):	10	Average Delay (sec/veh):	xxxxxx
Optimal Cycle:	39	Level Of Service:	A

Street Name:	SR 217 EB Ramps						Hollister Ave					
Approach:	North Bound			South Bound			East Bound			West Bound		
Movement:	L	T	R	L	T	R	L	T	R	L	T	R
Control:	Split Phase			Split Phase			Protected			Protected		
Rights:	Include			Include			Include			Include		
Min. Green:	0	0	0	0	0	0	0	0	0	0	0	0
Y+R:	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Lanes:	0 1	0	0 1	0	0 0	0 0	2	0	1 1	1	0	2 0 1
Volume Module:												
Base Vol:	113	94	235	0	0	0	428	960	65	26	461	63
Growth Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Initial Bse:	113	94	235	0	0	0	428	960	65	26	461	63
User Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
PHF Volume:	113	94	235	0	0	0	428	960	65	26	461	63
Reduct Vol:	0	0	0	0	0	0	0	0	0	0	0	0
Reduced Vol:	113	94	235	0	0	0	428	960	65	26	461	63
PCE Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
MLF Adj:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
FinalVolume:	113	94	235	0	0	0	428	960	65	26	461	63
Saturation Flow Module:												
Sat/Lane:	1600	1600	1600	1600	1600	1600	1600	1600	1600	1600	1600	1600
Adjustment:	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Lanes:	0.55	0.45	1.00	0.00	0.00	0.00	2.00	1.87	0.13	1.00	2.00	1.00
Final Sat.:	873	727	1600	0	0	0	3200	2997	203	1600	3200	1600
Capacity Analysis Module:												
Vol/Sat:	0.13	0.13	0.15	0.00	0.00	0.00	0.13	0.32	0.32	0.02	0.14	0.04
Crit Moves:			****					****		****		

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Water Boards

Central Coast Regional Water Quality Control Board

September 13, 2016

Andrew Bermond
City of Santa Barbara
Planning Division
P.O. Box 1990
Santa Barbara, CA 93102-1990
Email: ABermond@SantaBarbaraCA.gov

VIA ELECTRONIC MAIL

COMMENTS ON RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF SANTA BARBARA'S AIRPORT MASTER PLAN (JULY 2016), SANTA BARBARA COUNTY, STATE CLEARINGHOUSE TRACKING NO. 2014061096

Dear Mr. Bermond:

The Central Coast Regional Water Quality Control Board (Water Board) is a responsible agency charged with the protection of the waters of the State of California (waters of the State) in the Central Coast Region. Waters of the State include surface waters (including saline waters), groundwater, and wetlands. The Water Board is responsible for administering regulations established by the Federal Clean Water Act and the California Water Code (Porter-Cologne Water Quality Control Act). The Water Board also administers regulations, plans, and policies established by the Central Coast Region Water Quality Control Plan and the State Water Resources Control Board to protect watersheds, their resources, and their beneficial uses. These regulations cover discharges to surface water and groundwater, discharges to land that may affect water quality, and impacts to riparian habitat that could affect beneficial uses.

RWQ-1

Water Board staff understands that the Airport Master Plan (AMP) for the Santa Barbara Airport (Airport) proposes the following elements:

- Relocation of general aviation facilities and new general aviation improvements.
- Airfield safety improvements.
- Consolidation of automobile parking associated with the terminal.
- Terminal expansion.

Water Board staff offers the following comments on the recirculated draft Environmental Impact Report (RDEIR) for the AMP.

Alternatives Analysis

1. The RDEIR states at Page ES-4: "Initially, the project planners developed two airfield safety improvement alternatives, three terminal area improvement alternatives, and four north landside redevelopment alternatives." Impact BIO-1 (Loss of jurisdictional wetlands and indirect impact to Goleta Slough) at Page 4-35 then states that the construction of the proposed Taxiway H extension could result in the loss of jurisdictional wetlands and an

RWQ-2

incursion into GSER boundaries. In addition, Result BIO-1 at Page 4-36 states that this impact is considered a Class II, Less Than Significant with Mitigation.

Conversely, Table 5A at Page 5-19 of the draft final AMP states that Airfield Alternative 2 would mitigate taxiway hot spots (described as a basic objective of the project) without having any environmental impacts. However, Airfield Alternative 2 was eliminated from consideration in the RDEIR.

We have the following comments on these sections of the RDEIR:

Section 15126.6(a) of the CEQA Guidelines states that "An EIR shall describe a range of reasonable alternatives to the project, or to location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The basic project purpose of eliminating taxiway hotspots that are a safety concern can be achieved while avoiding impacts to waters of the State by constructing the Taxiway H extension without extending into waters of the State. As such, the RDEIR should consider alternatives that would have no environmental impact and still satisfy the basic objectives of the project, such as Airfield Alternative 2.

The Water Board seeks avoidance and minimization of impacts to waters of the State whenever practicable, since such impacts have the potential to result in an irreversible loss of valuable aquatic functions, due to the difficulty of achieving fully successful mitigation of lost waters or functions. When issuing any applicable Clean Water Act Section 401 Water Quality Certifications for projects associated with the AMP, Water Board staff will expect the City to: 1) show that avoidance of impacts to waters of the State, including wetlands, is not practicable; and 2) demonstrate that all practicable efforts to minimize unavoidable impacts to waters of the State, including wetlands, have been incorporated into the project design.

RWQ-2 (cont'd)

2. The RDEIR states at Page ES-1: "Before any ground-disturbing actions take place, they must be authorized in subsequent site-specific environmental analyses." The RDEIR also states at Page 2-7: "All actions would be subject to future review by the City under CEQA; this programmatic EIR will be used to help determine the appropriate subsequent CEQA review."

   We have the following comments on these sections of the RDEIR:

   The type of environmental analysis to be conducted for any projects under the AMP, and in particular the proposed Taxiway H extension into the GSER (IMPACT BIO-1), should be specified in the RDEIR. The appropriate level of CEQA analysis for the Taxiway H extension project is likely a Supplemental Environmental Impact Report.

RWQ-3

   Water Board staff anticipates that the proposed Taxiway H extension will be regulated by the U.S. Army Corps of Engineers (ACOE) and the Water Board through a Clean Water Act Section 404 permit and Section 401 Water Quality Certification (Certification), respectively. Water Board staff will be required to ascertain whether CEQA compliance for the proposed Taxiway H extension is acceptable prior to issuing a Certification.

RWQ-4

Impacts

3. Impact HYD-1 at Page 4-54 states that the proposed Taxiway H extension could result in the grading and placement of fill within 250 feet of Carneros Creek. Result HYD-1 at Page 4-54 states that the potential drainage and water quality impacts are considered a Class III, Less than Significant Impact.

   We have the following comments on these sections of the RDEIR:

   It does not appear that compensatory mitigation for the grading and placement of fill (permanent impacts) in waters of the State is proposed. If that is the case, this impact does not meet the definition of a Class III, Less than Significant Impact.

RWQ-5

4. Impact HYD-2 at Pages 4-54 and 4-55 states that the western 600 feet of the proposed Taxiway H extension would be located within a floodway and that there is the potential to expand one of the existing fuel farms (which are already located in a floodway). It is further stated that the Airport will experience flooding attributable to climate change and sea level rise over the useful life of projects recommended in the AMP. In addition, Result HYD-2 at Page 4-55 states that the extent to which Airport facilities within a floodway would impede or redirect flood flows cannot be fully determined until the design of the future structures is known and has been evaluated, but that all development projects would be required to comply with Chapter 22.24, Flood Plain Management of the City Municipal Code.

   We have the following comments on these sections of the RDEIR:

   Since Airport facilities, including expansion of the fuel farm area, are proposed to be constructed in floodways, the potential exists for floodwaters to mobilize pollutants on the site and convey them into four creeks (Tecolotito, Carneros, Las Vegas, and San Pedro), a designated tidal channel (Mesa Road Tidal Channel), the Goleta Slough, and the Pacific Ocean. This potential exists even if the Airport implements all technologically available measures to prevent non-stormwater discharges and pollutant discharges in stormwater runoff.

   The RDEIR should identify the frequency with which such a flood event can be expected to occur. In addition, the RDEIR should provide a scientific estimate of the type and quantity of pollutants that would be conveyed into waters, as well as an assessment of such pollutant releases on water quality and beneficial uses.

   The RDEIR should also identify mitigation to reduce this potential impact to less than significant levels.

RWQ-6

Mitigation

5. Impact BIO-1 at Page 4-40 states, "Mitigation for wetland habitat and/or riparian buffers shall be a minimum of 2:1 (restoration to impact) ratio."

   We have the following comments on this section of the RDEIR:

   The City should be more specific in the RDEIR with respect to their plans for mitigation of wetland and/or riparian habitat impacts. Restoration is not typically satisfactory as compensatory mitigation for permanent wetland impacts. Water Board staff will expect

RWQ-7

that the City will propose establishment or re-establishment of wetland habitat for permanent physical loss impacts. Due to the difficulty of successfully establishing or re-establishing wetland mitigation, permanent wetland impacts typically require greater than a 2:1 mitigation ratio.

RWQ-7 (cont'd)

6. Impact BIO-1 at Page 4-35 identifies four potential mitigation areas within or adjacent to the Goleta Slough. Areas 1 and 2 are located within the existing Goleta Slough Ecological Reserve (GSER).

   We have the following comments on this section of the RDEIR:

   Water Board staff has attended Goleta Slough Management Committee meetings over the past year on the subject of this RDEIR and the AMP. Discussions at these meetings revealed that there are discrepancies in the existing GSER boundaries reflected in the RDEIR. Updated and accurate maps of the GSER boundaries should be included in the Final EIR. Since the City proposes to utilize GSER acreage as part of their proposed compensatory mitigation, there may also be a need to revise their mitigation proposals to ensure that they align with accurate GSER boundaries.

RWQ-8

7. Impact BIO-1 at Page 4-35 discusses the regulatory agencies to be involved in the approval process for a Programmatic Wetland Restoration Plan (PWRP) and states that Water Board approval is not required.

   We have the following comments on this section of the RDEIR:

RWQ-9

   In order for the City to obtain a Clean Water Act Section 401 Water Quality Certification for any AMP-related project that impact waters of the State, the City will need to propose compensatory mitigation for all unavoidable impacts and submit a final Compensatory Mitigation Plan for Central Coast Water Board staff review and approval. As such, Water Board staff approval of the PWRP should be added to the RDEIR.

RWQ-10

Summary

The AMP proposes projects with the potential to have significant impacts to potentially irreplaceable wetland, creek, slough, and ocean habitat, with associated direct, indirect, and cumulative impacts to water quality and beneficial uses. We encourage the City to contact Water Board staff as soon as possible to discuss the AMP and how the projects proposed under it can be designed to be protective of waters of the State water quality standards and beneficial uses and meet Water Board permit requirements.

RWQ-11

If you have questions please contact **Paula Richter** at (805) 549-3865 or via email at Paula.Richter@waterboards.ca.gov, or Phil Hammer at (805) 549-3882.

Sincerely,

Digitally signed by Phillip Hammer
Date: 2016.09.13 13:01:46 -07'00'

for
John M. Robertson
Executive Officer

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Response to Recirculated Draft Program EIR - Letter 14
California Water Boards,
Central Coast Regional Water Quality Control Board (RWQ)
Dated September 13, 2016

RWQ-1: This comment states that the Central Coast Regional Water Quality Control Board (RWQCB) is a responsible agency for the State of California charged with protecting waters of the State in the Central Coast Region. Waters of the State include surface waters (including saline waters), groundwater, and wetlands. Regulations administered by the RWQCB cover discharges to surface water and groundwater, discharges to land that may affect water quality, and impacts to riparian habitat that could affect beneficial uses.

Response: Comment noted.

RWQ-2: This comment states that the Program EIR should consider Airfield Alternative 2 as an alternative to the project as proposed.

Response: Airfield Alternative 2 of the proposed Airport Master Plan (see Exhibit 5D of the draft Final AMP) has been incorporated into the Environmentally Superior alternative addressed in the Program EIR (see **Exhibit 3E**, Final Program EIR).

RWQ-3: This comment states that the type of environmental analysis to be conducted for any projects under the Airport Master Plan, and, in particular, the Taxiway H Airfield Safety Project, should be specified in the Program EIR.

Response: See Topical Response #3. All projects recommended in the proposed Airport Master Plan that meet the definition of a project under the *California Environmental Quality Act* (CEQA) and need future discretionary approvals will be required to complete some level of environmental review. It is not appropriate for the type of environmental document to be determined at this time when neither the timing nor the design of such projects is available. This Program EIR does not provide a project-specific level of analysis and review for future projects. The CEQA Guidelines provide adequate safeguards to ensure that future projects will be evaluated in an appropriate manner.

RWQ-4: This comment states that RWQCB anticipates that the Taxiway H Airfield Safety Project will be regulated by the U.S. Army Corps of Engineers (USACE) and the Water Board through a *Clean Water Act* Section 404 permit and Section 401 Water Quality Certification, respectively.

Response: Comment noted. Based on the preliminary surveys of the Taxiway H Airfield Safety Project's potential disturbance area, the area may encompass seasonal wetlands that may meet at least a one-parameter test required for wetlands by the California Coastal Commission (see **Exhibit 4C**, Final Program EIR). It is not as likely that the area will meet the three-parameter test required by the USACE and the California Department of Fish and Wildlife (CDFW). In any case, additional surveys will be necessary to evaluate the project-specific wetland impacts and an appropriate Habitat Mitigation and Monitoring Plan (HMMP) for the Taxiway H Airfield Safety Project. Regulatory jurisdictions and future permitting requirements will also be determined when, or if, the project goes forward.

RWQ-5: This comment states that the Program EIR does not propose compensatory mitigation for the grading and placement of fill in waters of the State related to the Taxiway H Airfield Safety Project.

Response: See Response to Comment RWQ-4. At this time, it is not anticipated that waters of the State will be affected by the Taxiway H Airfield Safety Project. If, during project-specific review, jurisdictional impacts are identified, then conditions and/or mitigation required by USACE and/or RWQCB would be required in concert with the project's CEQA review, Section 404 permit, and Section 401 certification.

RWQ-6: This comment states that the Program EIR should include scientific estimates of the type and quantity of pollutants that would be conveyed into local water bodies if flood events occur, identify the frequency with which such a flood event can be expected to occur, and include mitigation to reduce this potential impact to less than significant levels.

Response: The Airport currently monitors for pH, oil and grease, and total suspended solids (City of Santa Barbara 2015:Table 5.5) as part of its approved stormwater pollution prevention plan (SWPPP), which was designed to comply with California's General Permit for Stormwater Discharges Associated with Industrial Activities (General Permit) Order No. 2014-0057-DWQ (NPDES No. CAS000001) (City of Santa Barbara 2015:3). The Airport currently contains approximately 133 acres of aviation activities, including aircraft parking (ramps) and active aircraft movements (runways and taxiways). While implementation of the proposed Master Plan will occur primarily within areas of the Airport that are already used for aviation activities, the proposed Taxiway H Airfield Safety Project would increase the net acreage of impervious surfaces associated with aviation activity by an estimated five acres. Associated stormwater runoff and potential pollutants, similar to what currently occurs on the Airport runways and taxiways, would be subject to existing best management practices and monitoring activities per the SWPPP prior to being discharged via an existing storm drain and swale system into Carneros Creek (City of Santa Barbara 2015:13). At the programmatic level, the Airport's existing stormwater management processes are considered adequate to address the incremental increase in pollutants that could occur as a result of Master Plan implementation.

With regards to flood events, the current SWPPP includes the following: "Stormwater sampling and visual observations will be conducted during Qualified Storm Events (QSEs). A QSE is defined as any precipitation event that produces a discharge for at least one drainage area and is preceded by 48 hours of no discharge from any drainage area." The intent of the monitoring is to identify and correct any deficiencies, and implement any appropriate response actions as quickly as possible (City of Santa Barbara 2015:58).

RWQ-7: This comment states that the Program EIR should be more specific regarding mitigation for wetland and/or riparian habitat impacts and that restoration is not typically satisfactory as compensatory mitigation for permanent wetland impacts. A greater than 2:1 mitigation ratio is likely to be required.

Response: See Topical Response #2. BIO/mm-1 (i.e., the Programmatic Mitigation Plan [PMP]) has been refined to include higher mitigation ratios; additional habitat restoration areas; compensatory mitigation for upland habitat, if appropriate; and measures to enhance and restore biodiversity in the Slough. It is important to note that the Program EIR is not intended to take the place of future project-specific environmental evaluation at the time a recommended project is ripe for review. Rather, BIO/mm-1 provides the framework for future HMMPs related to the impacts of a specific project. The proposed mitigation areas are located within the contiguous part of the Slough or adjacent to Carneros Creek and contain areas that could benefit from restoration and enhancement. The areas have been vetted with CDFW and the Goleta Slough Management Committee.

RWQ-8: This comment states that the City needs to correct discrepancies in the Goleta Slough Ecological Reserve (GSER) boundary.

Response: Comment noted. The City plans to work with CDFW to resolve this issue and has had preliminary conversations with the Department on the subject. Future project-specific HMMPs that involve the Goleta Slough must be approved by CDFW and reflect an accurate GSER boundary.

RWQ-9: This comment states that on page 4-35 (Impact BIO-1) of the Recirculated Draft Program EIR, it discusses the regulatory agencies to be involved in the approval process for a Programmatic Wetland Restoration Plan (PWRP) and states that Water Board approval is not required.

Response: Page 4-35 of the Recirculated Draft Program EIR actually states, "Depending on the amount of rainfall, however, this infield area may function as an intermittent wetland area. If this remains the case, the USACE **and RWQCB** would likely take jurisdiction and require permits under the CWA." This language has been changed to "may" rather than "would likely" since a

three-parameter test may not be successful even if additional rainfall occurs (Final Program EIR, Section 4.2.4, Impact BIO-1). Refer also to Response to Comment RWQ-4.

RWQ-10: This comment reiterates RWQ-4 and states that in order for the City to obtain a *Clean Water Act* Section 401 Water Quality Certification for any projects impacting waters of the State, compensatory mitigation for all unavoidable impacts will be needed and a final Compensatory Mitigation Plan will need to be submitted to the Central Coast Water Board staff for approval. As such, this comment maintains that the PMP should be required to be submitted to the Central Coast Water Board staff for approval.

Response: There is a distinction between the currently proposed Master Plan and future individual projects. No Section 401 Water Quality certifications are necessary for adoption of the proposed Airport Master Plan and, therefore, its PMP does not need Central Coast Water Board approval. As discussed in Responses to Comments RWQ-4 and RWQ-5, regulatory jurisdictions and future permitting requirements will be determined on a case-by-case basis when, or if, future projects go forward. At that time, project-specific HMMPs can be submitted to the Central Coast Water Board for approval as Compensatory Mitigation Plans for a Section 401 Certification, as needed.

RWQ-11: This comment restates the commenter's position that projects recommended in the proposed Airport Master Plan have the potential to have significant impacts to wetland, creek, slough, and ocean habitat, and encourages the City to contact Water Board staff as soon as possible to discuss how projects proposed under the Airport Master Plan can be designed to meet Water Board permit requirements.

Response: The Central Coast RWQCB staff have participated in teleconferences and have been invited to meetings to discuss the proposed Airport Master Plan and its Program EIR. When future projects are ripe for design and environmental review, the agency will continue to be included through the State CEQA environmental process, as appropriate, and through the Section 401 certification process.

Mark Holmgren
Biologist
805 680-4045

City of Santa Barbara Planning Division
c/o Andrew Bermond, Project Planner
630 Garden Street
Santa Barbara, CA 93101

September 13, 2016

RE: Comments on Airport Master Plan Draft Recirculated Environmental Impact Report (DREIR)

I offer comments specific to the issues of analysis of bird activity with regard to the proposed Taxiway H extension, impacts to birds from ongoing hazing under the Wildlife Hazard Management Program (WHMP), and I offer options to mitigate the impacts to hazard management and Taxiway H should this proposed action move forward. MH-1

Other letters reviewing the DREIR detail the challenges of permitting conversion of land in the Goleta Slough State Ecological Reserve. I assert that the biological survey effort that led to a Class II impact in the grassland/possible wetland area was not adequate to document the importance of the area to Horned Lark (locally rare species), Belding's Savannah Sparrow (State Endangered), and to White-tailed Kite (State Fully Protected, SB County Environmentally Sensitive Species in the certified coastal Land Use Plan). Other protected raptors are also known to use this area. MH-2

At the heart of so many difficulties in understanding the diminishment of resources on Goleta Slough is the inattention to the slough ecology. As the longest-standing member of the Goleta Slough Management Committee, I have described the problems emanating from the lack of animal and plant surveys and ecological monitoring too many times to recall.

The DREIR is the latest document from the airport to ignore the presence of the last known South Coast Santa Barbara Co. breeding population of Horned Lark. That this is a locally rare species and that locally rare species deserve attention under CEQA is a fact consistently minimized in the presentation of species impacts in this area. A museum specimen at UCSB's Center for Biodiversity and Ecological Restoration (UCSB 29364) is physical evidence that this species is present, it breeds in this area, and that a small airplane crushed this dependent juvenile in summer 1995. MH-3



This specimen was permanently prepared as it was found near the intersection of runways on 30 June 1995. The specimen tag reads: "dead fledgling w/ adult still seemingly attendant to it."

MH-3 (cont'd)

Other more recent evidence of Horned Lark presence is available; some is presented in the DREIR.

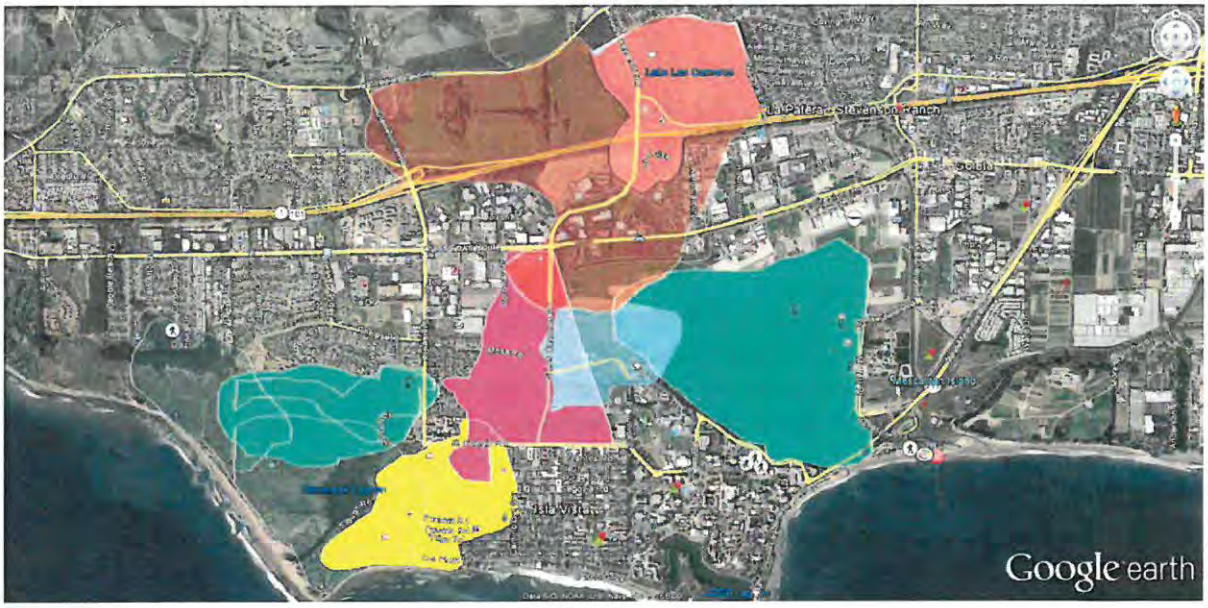
Belding's Savannah Sparrow. The DREIR acknowledges that this species uses upland habitats near salt marsh habitats, but there is sufficient indication that this area is likely to convert to salt marsh as sea level rises. It is an incipient wetland habitat that we would be wise to preserve, and probably would be preserved if we had a comprehensive plan to deal with sea level rise at the SB Municipal Airport. In fact, the Taxiway H area probably functions currently as refuge to birds and mammals during floods, storms, and severe high tides. Again, because we have so few and only project-driven biological assessments we aren't aware of how the estuary operates, how the ecological web is constructed, and we have nothing resembling a complete picture of the services Goleta Slough provides for animals that rely upon it.

MH-4

White-tailed Kite. I have monitored the Goleta Valley population of kites for 30 years. This population is in severe decline. In 1998, the kite monitoring effort documented more than 20 breeding events from foothills to coast, from Winchester Cyn to San Marcos Foothills. Yet, in 2015, we experienced one pair of breeding kites. While the recent decline is drought-related, the long-term decline is most likely primarily a result of the conversion of open spaces and the loss of viable habitat connecting those that remain. The direct effect is on the small mammals on which kites and other raptors rely. Addressing the impacts of airport activities on prey population can mitigate development proposals such as Taxiway H.

MH-5

White-tailed Kites are present in the proposed Taxiway H area. Observers on the north side of the airport report frequent foraging along the north side of Runway 7-25. Over the years I have often observed Kites in grasslands along the north side of Runway 7-25. It's vital to know how the hazing effort under the Airport's WHMP affects not only kites, but also Norther Harriers, American Kestrels, Peregrine Falcons, and Burrowing Owls. Furthermore, the effects of hazing have not been mitigated. I present below a new option to offset habitat loss, corridor diminishment and loss, and other impacts to raptors.



*This figure shows the approximate **Foraging Areas** used by White-tailed Kites in the years when pairs of Kites nest within a colored polygon. Occupancy of the foraging areas and the shape of the area varies within and between years depending upon the abundance of accessible prey and the presence of nearby nesting raptors. There is a regular foraging presence by White-tailed Kites in the vicinity of proposed Taxiway H.*

I disagree with Impact BIO-2, which concludes that the area of proposed Taxiway H is not considered suitable foraging habitat for the White-tailed Kite and direct impacts will not occur. On the contrary, the habitat is ideal for foraging for Kites and other raptors. The fact that reductions in prey populations are routinely undertaken constitutes an impact that may be conducted, but should be reviewed for its consistency with required guidelines and its effectiveness. This program is not exempt from mitigation for the impacts to natural resources. The airport cannot undertake programmatic

MH-6

MH-7

MH-8

reductions in prey and then claim that for that reason the habitat is not viable. Furthermore, we see no evidence that prey reduction activities have been assessed for their success in reducing small mammal populations.

MH-8 (cont'd)

A vital behavior of kites is the habit of nocturnal roosting. A healthy population of White-tailed Kites is typified by daily movements at all times of year from daytime foraging areas via riparian pathways and other open space connections to Goleta Slough. Once an animal is in Goleta Slough it typically moves in the late afternoon to a communal roost, most of which are either on or immediately peripheral to Goleta Slough (e.g., More Mesa, Atascadero Creek lemon orchards, or wetland on the north side of Hollister Ave.) The individual kite moves from its roost to its foraging area in the early morning. Goleta Slough therefore operates as the hub of most of the local Kite population. In recent years, the communal roosting habitat has dissolved. Kite pairs now roost individually. Foraging areas from the 1990s and 2000s are no longer viable. The actions on Goleta Slough, and specifically the Wildlife Hazard Management Program, may have contributed to this decline by depleting small mammal populations and retarding their recovery in grasslands near the runways. We risk extirpation of White-tailed Kite in Goleta.

MH-9

White-tailed Kite holds special status in Santa Barbara County beyond the protection afforded by federal legislation afforded to all native migratory birds. The area covered by the county's LCP borders the City's LCP boundary GS Ecosystem Management Area on the east and south-east. The GS Ecosystem Management Area encompasses Atascadero Creek and More Mesa, which are within the protective envelope provided by the County LCP to Kites. Atascadero Creek is a major conduit along the More Ranch Fault that Kites have used for decades to visit nest and roost sites at More Mesa. More Mesa was for many years the most important roost site and still serves an important year-round foraging and seasonal nesting role for the local population. In late 1978, up to 110 White-tailed Kites roosted on More Mesa. Because of the interconnections among habitats, and regular passage from city to county habitats, it is necessary to evaluate the effects of actions on the airport, including habitat loss, to areas within the County LCP area.

MH-10

In recent years, other roost sites are on Goleta Slough. This includes grasslands, riparian habitats, and oak woodland intimately connected to the Airport LCP area. For roosting, foraging, and nesting, Kites move freely in and out of the Goleta Slough on a daily basis. To not afford protection to Kites, were the City LCP to be updated, might be found to be non-conforming under the CC Act. It appears that the only reason White-tailed Kites are not afforded the same protections offered by the County is the failure to update the City Airport LCP.

MH-11

In the County's LCP White-tailed Kite habitat is Environmentally Sensitive Habitat. It would make no sense to treat Kite habitat, wherever it occurs on Goleta Slough, as less than ESHA because a lesser level of protection is grossly inconsistent with that of the adjacent jurisdiction. Accordingly, the DREIR should treat not only the nesting likelihood of White-tailed Kite, but also its foraging habitat as it would be treated in a County review.

While the DREIR inconsistently acknowledges the nesting habitat requirements by Kites, it fails to acknowledge the foraging requirements, which are equally important for nesting success. When evaluating impacts to, and proposing mitigations for kites, animals they rely upon must be considered for protection and avoidance, and must be the focus of mitigation. With the cumulative loss of habitats for small mammals in the airport vicinity and the continued truncation of the corridors they used to pass among habitat areas, the loss of habitat in proposed Taxiway H contributes to further loss of habitats for the small-mammal prey that kites and other raptors rely upon. This is an impact for which no mitigation is proposed and it must be considered a Class I Impact. MH-12

The inconsistency with the protections offered by the County would likely be resolved, and Kites would receive a higher level of attention in project review, if the LCP for the Airport was updated.

Finally, the DREIR suggests that suitable buffers are credited with affording the proposed Taxiway H a Class II (Mitigable) Impact should White-tailed Kite nesting occur in Willow habitat along Carneros Creek. However, without knowing the project specifications and without designating a buffer distance, this conclusion is impossible to support. MH-13

Mitigation for Raptor Impacts: New Tools in Restoration Ecology

Because impacts are considered mitigable to White-tailed Kite in this DREIR, it's not surprising that mitigation actions are not mentioned. However, should the full impacts be acknowledged, actions are available for the loss of habitat and reduced populations of small mammals that support Kites and other raptors.

The actions below emphasize one simple point. If we wish to revive habitats that have lost their ability to support raptors, we can focus on the reviving the missing resource—the small mammal community on which raptors rely. In areas such as Goleta Slough where other necessary resources (roost sites, water, nest sites) are marginally intact for White-tailed Kites, the missing resource is the California Vole population. MH-14

It's been the false assumption that ecological restoration directed at habitat creation or enhancement can mitigate the damage to raptor habitats and loss of prey populations. It is assumed that if you build it, they will return. However, there exists no evidence this kind of mitigation can recover habitat for

Voles and other Kite prey species. And it's an assumption that is especially difficult to achieve in an expanding human community. Mitigation should imply more immediate repair of an impact.

I offer a two-pronged mitigation framework involving refocused restoration of plant communities and California Vole restoration through captive propagation. This two-pronged approach would involve:

a) Habitat enhancement designed to increase rates of population growth and seasonally favoring Vole productivity over accessibility to predators,
b) Population enhancement through captive propagation.

Habitat Restoration Designed for California Vole

Inventory

First, it's important to establish to what extent Voles exist in the area. The goal is to preserve and secure areas where Voles are already established and where they are able to reproduce. An inventory will clarify the small mammal species that exist and their movement patterns among the areas they use (i.e., their movement corridors). Where on the slough are they able to breed and where are they feeding? What proportion of the habitat serves as a refuge vs. that which is accessible to predators?

Second, determine the other predators that might compete for Voles in the area.

MH-14 (cont'd)

Choose a Reference Site

Third, we choose a reference site near Goleta where inventories show an active vole population. Use the reference to assist in the design of the habitat restoration (as a model) and to measure success on the slough. A different nearby site may serve as the donor site for the captive propagation component.

Choosing a Restoration Site

The choice of sites to restore on Goleta Slough will be close to the Kite foraging area, have compromised Vole productivity, but otherwise have most of the elements needed for successful Vole use. From the tool chest of restoration approaches habitat enhancement of existing, but compromised, habitat would be the proper tool. Restoration involving moderate or extensive soil disturbance will not work.

Habitat Restoration Success Criteria.

Restoration to benefit animal communities requires important shifts in the way we measure the results. Restoration targeting plant communities involves a degree of intrusion for maintenance, watering, and weeding that obviates colonization and reproduction for small mammals, especially if the need is for a short-term response. The goal must be to minimize intrusion and restrict maintenance to the season when Kites are not breeding. Thus, we need new success criteria from regulatory agencies based not on plant success, which

encourages overplanting and excessive maintenance, but rather based on feedback from the animal occupants and from the predatory animals.

Long-term Support for Kites

Finally, we need a landscape level understanding of habitat connectivity among small mammal populations. From that comes restoration where needed and set-backs to ensure movement among populations. This movement is critical to facilitate prey population recovery following inevitable droughts, floods, diseases, and periods of overhunting by predators.

The objective is to enhance prey productivity to move from a muted population growth cycle to a healthy cycle.

Captive Propagation of Prey Populations

To trigger a healthy population growth cycle, captive propagation is an available tool. Captive propagation is being applied more often to solve problems with endangered species, threatened or unique gene pools, to achieve genetic augmentation, and loss of habitat. Often it is used for education purposes when taking animals from the wild is not legal or ethical. Zoos are frequent practitioners of captive propagation. And of course, small mammals have been bred in captivity as food for snakes and other captive predators for years. The techniques are available and, with some challenges, most notably with larger animals, they are becoming more successful.

MH-14 (cont'd)

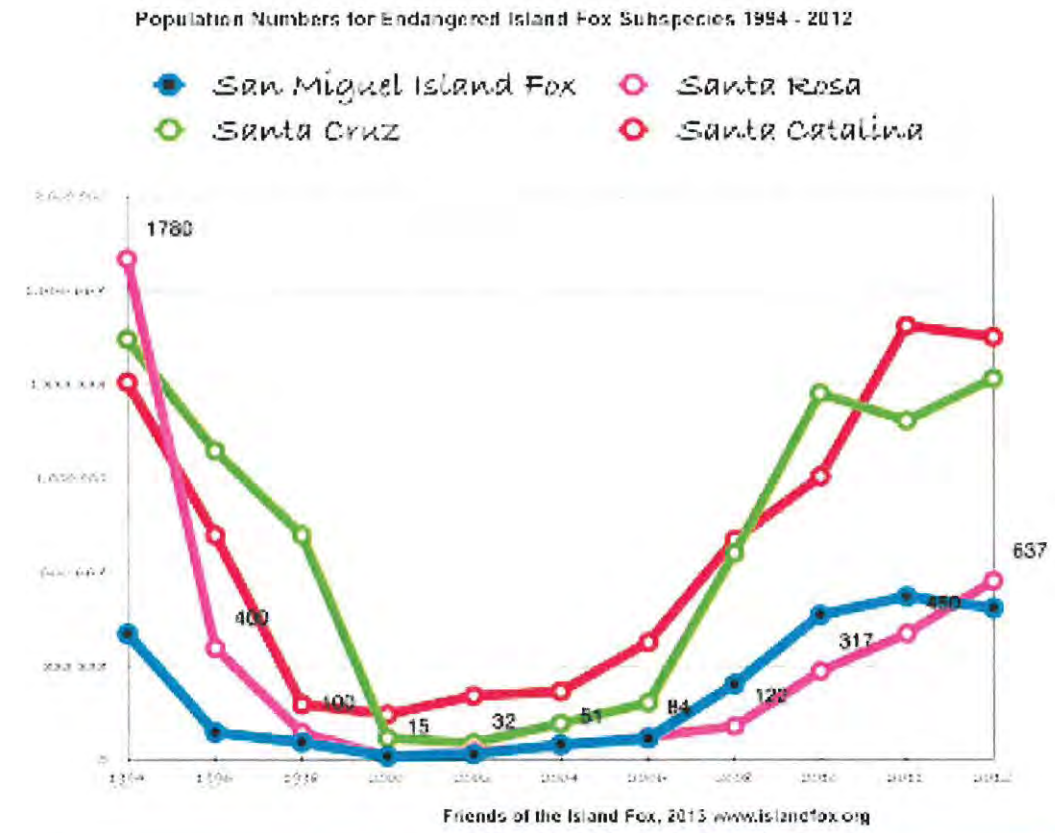
Two models are available that demonstrate that captive propagation has been successful. Captive propagation may only be necessary where habitats have lost their entire population of Voles. This might be the case on Goleta Slough. But a more modest form of population assistance featuring *Vole protection* (to increase areas where breeding can occur but predation cannot) or *habitat augmentation for Voles* (providing specific elements of the ecosystem necessary to achieve rapid reproduction) rather than captive propagation may be appropriate. While the models below illustrate the feasibility of captive propagation with predators such as the ferrets and fox, we should be even more confident that it can be established for small mammals.

Model 1: Black-footed Ferret[1]

From a single remaining population of 18 individuals found in Wyoming in 1981, many hundred healthy individuals have been placed in 5 or so prairies in Mexico and the western US. For details see the *Science* article.

[1] Black-footed Ferret Recovery, **SCIENCE** Vol. 288, 12 MAY 2000. www.sciencemag.org.

Model 2: Island Fox



A program involving captive propagation and treatment for canine distemper resulted in population changes in the four races of Island Fox[2] between 1994 and 2012. This effort involved both habitat restoration designed to meet the needs of foxes and propagation of foxes while captive.

In summary, there are additional feasible mitigation measures to restore small mammal populations on site or off site that can mitigate impacts to Kites and other raptors from Taxiway H to less than significant levels. These additional mitigations should be included in the final EIR.

Benefits of This Two-pronged Approach to Ecological Restoration

A program based on this approach solves several problems:

[2] http://www1.islandfox.org/

MH-14
(cont'd)

1. It reduces intrusions from maintenance to make restored areas functional for predators and prey,
2. It provides a benefit to Kites within a few months of the effort because voles have short generation times with an output of 5 to 10 broods per year,
3. Other predators will benefit from the additional prey.
4. It provides long-term as well as short-term solutions by identifying and securing corridors among sites productive for small mammals.

MH-14 (cont'd)

On Goleta Slough and elsewhere the City of Santa Barbara by inventorying Voles could come to a more realistic assessment of the degree of threat to White-tailed Kite and their prey and determine more accurately the risk to Kites and other raptors early in a project.

Thank you for the opportunity to comment on the DREIR.

Mark Holmgren
Maholmgren33@gmail.com

Response to Recirculated Draft Program EIR - Letter 15
Mark Holgren (MH)
Dated September 13, 2016

MH-1: This comment states that the intent of the letter is to offer comments with respect to bird activity, the proposed Taxiway H Airfield Safety Project, and the Airport's activities under the Wildlife Hazard Management Program (WHMP).

Response: Comment noted. With respect to the Taxiway H Airfield Safety Project, it will have its own project-specific environmental analysis when it's ripe for environmental review. The Program EIR provides a general overview of the potential impacts that could occur from plan implementation, but does not have adequate project-specific details to provide a project-specific level of analysis on any future capital improvement projects. The Taxiway H Airfield Safety Project, in particular, cannot be constructed in the near future due to the number of regulatory steps involved and amount of funding that must be procured. Future environmental review of this project will include additional site-specific survey efforts.

The Airport's WHMP is not a part of the proposed Airport Master Plan. It is a document required by Federal law and was approved by FAA on February 27, 2017. Discussion of existing and proposed wildlife hazard management at the Airport in the Program EIR is within the context of Applicable Plans and Policies (Section 4.2.2) related to biological resources. A wildlife hazard management plan is an operational document required by FAA for a Part 139-certificated airport.

MH-2: This comment states that the biological survey effort was not extensive enough to document the importance of the area to specific protected bird species. Comments related to each species are then discussed in following portions of the letter.

Response: Comment noted. Please see the responses to the specific points of the comment letter in the subsequent text, which address this comment in more detail. The Airport recently completed a year-long Wildlife Hazard Assessment (WHA) with extensive bird counts (Dudek et al. 2016). The WHA was appended to the Recirculated Draft Program EIR, Appendix B.

MH-3: This comment states that Recirculated Draft Program EIR ignores the presence of the last known South Coast Santa Barbara County breeding population of horned lark, which is a locally rare species.

Response: Several issues relate to potential impacts to horned lark nesting and horned lark habitat: (1) the regulatory status of the locally breeding subspecies in the context of the species across its range; (2) the apparently declining status of the locally nesting subspecies at the Santa

Barbara Airport; and (3) current habitat conditions at the Airport. The horned lark (*Eremophila alpestris*) is a widespread species that breeds throughout the Northern Hemisphere. Grinnell and Miller (1944) noted nine subspecies in California, including the California horned lark (*Eremophila alpestris actia*), the subspecies that breeds in mainland Santa Barbara County, and the only subspecies with any special status in California. The California horned lark is a CDFW Watch List species and locally rare nesting species. The California horned lark was formerly common in coastal Santa Barbara County, but now occurs very locally and is declining (Lehman 2017). Along the south coast, it may continue to nest opportunistically in small numbers at several locations, including the Airport. However, the current mowing regime, which is based on standard mowing practices at Part 139 airports and adheres to requirements of the WHMP, permits grasses to reach lengths unsuitable for this species in much of the Airport.

As acknowledged in Appendix C of the Draft Program EIR, the *Santa Barbara Airport Special-Status Species Inventory* (Dudek 2012), California horned larks "have historically nested in grassy areas near the runways and taxiways of the Plan Area, where as many as 17-20 were recorded during the nesting season in the 1990s (GSMC 1997)." This was considered the last known breeding location on the south coast. Several recent records suggest the species still nests locally, and perhaps opportunistically, at other locations. Records of two independent juveniles at the Carpinteria Bluffs on June 17, 2004, and one fledgling with a presumed parent at Carpinteria Salt Marsh, June 23, 2017, suggest this species persists in very small numbers in the Carpinteria area (Holmgren and O'Loghlen 2017). Other recent south coast records confirming or suggesting breeding include a juvenile near Coal Oil Point in Goleta, June 26, 2004, and two adults with two fledglings at Eling's Park in Santa Barbara, June 5, 2017 (Holmgren and O'Loghlen 2017).

At the Airport, the few reports suggest that California horned larks no longer breed regularly and that unknown subspecies of horned larks may be present in small numbers at other seasons. The only record since the 1990s suggesting local breeding involved two juveniles along the access road adjacent to Basin B-D on June 29, 2007, in an area near where an adult had been singing earlier in the month (Lehman 2017). Although many of the avian surveys at the Airport have focused on wildlife hazards from birds at Goleta Slough, which does not provide nesting and foraging habitat for horned larks, several have included observations from grasslands around the airfield. From April 2001 through January 2002, URS (2003) conducted surveys from four locations around the airfield that provide potential habitat for California horned larks. During this 10-month period, horned larks were observed in small numbers, and on four occasions: September 10, November 21, and December 19, 2001, and January 23, 2002 (unpublished data). From December 2014 to November 2015, as part of studies for the WHA, Dudek et al. (2016) conducted avian point count surveys in all parts of the Airport, including nine locations adjacent to the airfield and surrounding grasslands. During the studies, horned larks were observed on four occasions: January 29, August 25, November 5, and November 19, 2015. Although territorial horned larks in spring would be singing and readily detectable, no horned larks were observed during the breeding season, which extends from approximately March through July, during either survey effort. Therefore, surveys since the 1990s suggest that California horned larks likely breed only sporadically at the Airport and other locations on the south coast. Horned larks occurring at other seasons could be other subspecies; thus, they may or may not be California horned larks.

Current habitat conditions in grassy areas, such as the Taxiway H Airfield Safety Project area (where the proposed project would result in impacts to 6.1 acres of grassland), likely provide only limited suitable habitat. The species preference for bare ground and very short grasses (Beason 1995) limits the attraction of many areas around the airfield. Per requirements of the WHMP, grasses are not mowed to a length of less than seven inches. Therefore, although some areas may remain bare year-round, most vegetated areas will retain a vegetation height poorly suited for this species.

In conclusion, the evidence suggests the California horned lark is currently absent or nearly absent as a breeding species at the Airport. As habitat conditions support relatively little habitat for this species, impacts to habitat for the California horned lark would be less than significant. In the event that horned larks do nest at the Airport at the time of construction in grasslands, and to avoid direct impacts to nesting birds, nesting bird surveys will be conducted prior to any ground disturbance that occurs during the breeding season (grassland, bare ground). BIO/mm-3 in this Program EIR requires preconstruction nesting bird surveys within 300 feet of disturbance areas for all species and thus would ensure avoidance of impacts to nesting horned larks, in the event that any do nest in the project vicinity.

MH-4: This comment states that the Belding's savannah sparrow habitat present within the Slough may be converted to salt marsh as sea level rises. Therefore, the Taxiway H Airfield Safety Project area probably functions as a refuge for birds and mammals during floods, storms, and severe high tides.

Response: This comment is conjecture on the part of the commenter. In fact, the Taxiway H Airfield Safety Project area is part of the Air Operations Area that is actively managed to prevent wildlife hazards to aircraft. As a result, wildlife in this area are hazed by Airport Operations and Patrol Divisions as part of their routine duties in compliance with the FAA Manual "Wildlife Hazard Management at Airports" dated July 2005.

MH-5: This comment states that a recent documented decline in white-tailed kite population is drought-related, but that the long-term decline is most likely a result of the conversion of open space and the loss of viable habitat connecting those that remain, which effects the small mammals that kites and other raptors eat. Therefore, addressing the impacts of airport activities on prey population could mitigate development proposals such as Taxiway H.

Response: Comment noted. Refer to Topical Response #1. However, for safety purposes, the Airport is required to manage small mammal and avian populations in compliance with the FAA Manual "Wildlife Hazard Management at Airports" dated July 2005.

MH-6: This comment states that white-tailed kites have been observed foraging on the north side of Runway 7-25 and that it is vital to know how the hazing activities at the Airport affect kites and other birds of prey. The comment disagrees with the Program EIR (Impact BIO-2), which says that the area of proposed Taxiway H Airfield Safety Project is not considered suitable foraging habitat and that direct impacts will not occur.

Response: Refer to Topical Response #1. This comment does not provide back-up documentation regarding its assertion that white-tailed kite has been observed foraging on the north side of Runway 7-25.

MH-7: This comment states that the Airport's routine wildlife management activities are an impact that is not exempt from mitigation requirements.

Response: The Airport's Wildlife Hazard Management Plan (WHMP) is not a part of the proposed Airport Master Plan. It is a document required by Federal law and was approved by FAA on February 27, 2017. Discussion of existing and proposed wildlife hazard management at the Airport in the Program EIR is within the context of Applicable Plans and Policies (Section 4.2.2) related to biological resources. A wildlife hazard management plan is an operational document required by FAA for a Part 139-certificated airport.

MH-8: This comment states that the Airport cannot claim that potential foraging habitat at the Airport is not viable due to its wildlife management program. It also states that these activities have not been assessed for their success in reducing small mammal populations.

Response: See Topical Response #1. A technical memorandum has been prepared to further evaluate the potential for project-specific or cumulative impacts to foraging habitat for the white-tailed kite (*Elanus leucurus*), specifically from the proposed Taxiway H Airfield Safety Project (Final Program EIR, **Appendix C**). The analysis concludes that although brome grasses, like those present at the proposed Taxiway H project site, are considered to provide suitable foraging for kites, the lack of small mammals (based on recent trapping efforts), the absence of kites in the area north of the runway (during a year-long survey effort), and the distance of the Taxiway H project site from known nest locations (Final Program EIR, **Appendix C**, **Figure 1**) suggest that the area only provides low-quality foraging habitat for nesting white-tailed kites.

MH-9: This comment provides information regarding nocturnal roosting behavior of white-tailed kites and states that the Goleta Slough operates at the hub of most of the local kite population. The comment also states that the kite is at risk of extirpation in Goleta.

Response: See Topical Response #1.

MH-10: This comment states that the white-tailed kite holds special status in the Santa Barbara County Local Coastal Plan (LCP), the boundaries of which border the City's (i.e., Airport LCP) on the east and southeast. Because of the interconnections among habitats, this comment states that actions of the Airport, including habitat loss, must address areas within the County LCP area.

Response: The County LCP states that, "The More Mesa grassland provides a feeding and nesting habitat for the White-tailed Kite. … The kites use the oak trees, found in the northwest portion of More Mesa, for communal roosting at night and as nesting sites during the breeding season. The surrounding grasslands, ravines, and flood plains of Atascadero Creek serve as hunting grounds for the kites, which feed mainly on the meadow vole and harvest mouse. …" (County of Santa Barbara 2014:135). County LCP Policy 9-29 further states that "In addition to preserving the ravine plant communities on More Mesa for nesting and roosting sites, the maximum feasible area shall be retained in grassland to provide feeding area for the kites."

The Airport LCP states with respect to resident and migratory birds in the Slough, "One of the smaller subgroups, Vultures, Kites and Hawks, account for a constant but small number of individuals. The most frequently encountered species was the California protected White-tailed Kite." (City of Santa Barbara 2003:3-14). The Airport LCP contains no specific policies related to this subgroup of avian species.

MH-11: This comment states that the white-tailed kite roosts on and near Goleta Slough and that it appears that the only reason kites aren't afforded protection in the City's Airport LCP is that it hasn't been updated.

Response: The County LCP was adopted in 1982, while the Airport LCP was written in 1982 and recertified by the CCC with amendments in 2003. See Topical Response #1 and **Appendix C** of this Final Program EIR.

MH-12: This comment continues the comments in MH-11 for protecting kites and kite habitat consistent with the Coastal Act and County LCP policies, and calling out cumulative impacts due to loss of kite foraging habitat as Class I, Significant (after mitigation).

Response: The applicable LCP for the Airport is the City's Airport Coastal Plan: Component 9 and there are no ESHAs that will be directly affected by the proposed Airport Master Plan. If the LCP is updated as suggested by MH-11 as part of an LCP amendment required for the Taxiway H Airfield Safety Project, additional detailed analysis of the loss of ESHA (including kite foraging habitat) would be addressed at that time. See Topical Response #1.

MH-13: This comment states that suitable buffers along Carneros Creek from the proposed Taxiway H cannot be fully determined without knowing the project specifications.

Response: Comment noted. If the Taxiway H Airfield Safety Project is pursued, project-specific analysis based on its design will be necessary. Carneros Creek is approximately 250 feet from the estimated project disturbance area, but this distance will need to be confirmed or adjusted based on project design.

MH-14: The remainder of this comment letter contains a detailed proposed mitigation program intended to revive the small mammal community on the Airport to entice raptors, such as the white-tailed kite, to use the area. The specific mammal targeted by the comment is the California vole population.

Response: This proposal is in potential conflict with the Federal Aviation Administration's Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports* (FAA 2007), and the Airport's WHMP (City of Santa Barbara 2017).

HEAL THE OCEAN

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September 16, 2016

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

Re: Santa Barbara Airport Master Plan Draft Environmental Impact Report (July 2016 Revision)

Dear Mr. Bermond,

Thank you so very much for admitting Heal the Ocean (HTO) comments on the updated July 2016 draft of the Environmental Impact Report for the proposed Airport Master Plan. We commend the Santa Barbara Planning Division on its acceptance of public comment and outside input, which makes a planning document hopefully better.

Introduction

HTO has concerns about the updated draft referring to sea level rise (SLR) and its effects what we believe is still a vague and far-off manner, and that sea level rise data is retained simply for "informational purposes," as stated in the document. Despite this, the revised DEIR references the recommended taxiway project as being located partially within the floodway along Carneros Creek, and the debate around this alone indicates that SLR is recognized as having a physical impact. Similarly, other existing uses and/or structures located within floodway areas (i.e. the maintenance yard and two historic hangars), would be relocated out of the floodway also. These and other such planning decisions being made because of SLR seem to contradict the *modus operandi* that SLR data is for "informational purposes" only. To Heal the Ocean, these adaptation measures constitute a recognition that water is on its way in.

OCEAN-13

We would like to again stress that a 100-year flood event may not wait 100 years to arrive, it can happen at any time. We are concerned that in terms of the Airport itself the mitigation consists of applying thicker pavement lifts "with regular intervals" - which seems to be the only concrete sea-level rise solution within the updated DEIR. There are still no estimations regarding elevation increases, land subsidence, or flood reduction success, which would be important elements of a planning document.

OCEAN-14

Correlation needed between Airport Master Plan & City of Goleta Coastal Hazards Vulnerability Assessment and Fiscal Impact Report

On December 1, 2015, the City of Goleta approved and adopted the *Draft 2015 City of Goleta Coastal Hazards Vulnerability Assessment and Fiscal Impact Report* (prepared by the City of Goleta with Assistance from Revell Coastal, Santa Cruz, CA. December 2015). The unanimous vote to adopt by the Mayor and the City Council should be interpreted as a sign of the City's commitment to take into account, in its formulation of a new Local Coastal Program (LCP), the risks it expects to face as a result of climate change. In supporting ths Goleta Coastal Hazards Vulnerability Assessment report, the City of Goleta Planning and Environmental Review Director stated that "(c)limate change is upon us, affecting almost every facet of California's natural and built environment"[1]. In addition, each clause of the Resolution adopting the report reflected a concern for such risks. For example, the initial clause reads: "(T)he risk of coastal hazards is significant for people living on the south coast of Santa Barbara County, including the City of Goleta, due to the potential loss of life, property damage, and potential loss of natural and cultural resources"[2] .

Background to the Goleta Coastal Hazards Report

In response to the perceived threats to coastal cities due to climate change, the California Coastal Commission (CCC) directed local governments to update their LCPs with provisions that plan accordingly for these widely predicted threats. Even more specifically, the CCC now sees the challenges posed by the singular threat of SLR to be particularly urgent. As a result, in August 2015 the CCC unanimously adopted the Sea Level Rise Policy Guidance, which provides an overview of the science addressing SLR along the California coast and suggests ways for local coastal communities to prepare for rising coastal waters in their CCC planning and regulatory actions[3]. The *Draft 2015 City of Goleta Coastal Hazards Vulnerability Assessment and Fiscal Impact Report* is the result of this climate change-sensitive stance by the CCC.

OCEAN-15

What is a Coastal Hazards Vulnerability Assessment?

According to the report, a *Coastal Hazards Vulnerability Assessment* is a process "whereby a community collaboratively seeks to understand the threat of climate-induced coastal hazards, such as sea level rise (and) identifies the community's values, determines whether these values are vulnerable to damage or loss from coastal hazards, and develops a course of action for protecting those values." Behind the process lies a methodology that relied on climate models, fiscal analysis, accessible field and archival data, and stakeholder input gathered through meetings with community leaders, CCC staff, attendees at a coastal hazards public workshop, and members of the City's Planning Commission and other

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[1] *Memorandum to Mayor and Councilmembers*, City of Goleta, Undated. <http://www.cityofgoleta.org/home/showdocument?id=11174>.

[2] *Resolution No.15-55* and *Draft 2015 City of Goleta Coastal Hazards Vulnerability Assessment and Fiscal Impact Report*. City of Goleta, December 1, 2015. <http://www.cityofgoleta.org/home/showdocument?id=11317>

[3] California Coastal Commission. *Sea Level Rise Adopted Policy Guidance,* August 12, 2015. <http://www.coastal.ca.gov/climate/slrguidance.html>.

Departments, and its City Council. The *Fiscal Impact* of the report's title reflects the estimates of the financial costs to the City due to the expected impacts of climate change[4].

In its analysis of these impacts, the report profiles 11 vulnerable City sectors, and for each of the sectors recommends a set of remedies and adaptations. The sectors highlighted in the report include[5]:

- Land Use and Structures (Old Town Area)
- Land Use and Structures (Coastal Resources Area)
- Coastal Armoring
- Oil and Gas
- Hazardous Materials
- Natural Resources
- Public Access
- Transportation
- Wastewater
- Water Supply
- Utilities

OCEAN-15 (cont'd)

The City is roughly midway toward its goal of a new LCP. Overall, the process toward an LCP requires six steps to satisfy the CCC's policy guidance, and, with the issuance and adoption of the *Draft 2015 City of Goleta Coastal Hazards Vulnerability Assessment and Fiscal Impact Report,* the City has met steps one through four[6].

Looking ahead, the report describes step five as calling for the drafting of a new LCP for final plan certification by the CCC, once there has been additional public outreach and any resulting revisions to the plan. Finally, step six covers implementation, monitoring and revision as warranted, which can necessitate an updated report that can take advantage of refinements to adaptation models and implementation strategies[7].

HTO feels quite strongly that the Airport Master Plan should fit in with the City's *Coastal Hazards Vulnerability Assessment.* We are concerned that while the rest of the coastal area is preparing for the full effects of SLR and increased flood events, the Airport is planning on utilizing band-aid solutions and will put off serious consideration of relocation or infrastructure redesign until the actual flooding is at hand.

The Importance of Identifying Specific Vulnerabilities

Although the moving of the Santa Barbara Airport is daunting (and therefore not covered in the Airport Master Plan), the City of Goleta's ***Coastal Hazards Vulnerability Assessment*** has identified the Goleta Sanitary District Wastewater Treatment Plant as possibly having to be moved in the future - and the report has put a rough financial cost in its assessment.

OCEAN-16

[4] *Draft 2015 City of Goleta Coastal Hazards Vulnerability Assessment and Fiscal Impact Report. City of Goleta,* op. cit., p. ES-1.
[5] Ibid., p. 5-6
[6] Ibid., p. 1-4
[7] Ibid., p.1-7

The importance of identifying these vulnerabilities cannot be overstated. First, identifying the problem in a document helps later on, when state funding is needed to make significant moves. Second, if flooding of the Airport is inevitable, planners must weigh the wisdom of spending funds on preservation rather than retreating - when retreating is inevitable. It is not too soon to be thinking of the cost and logistics of retreat.

According to flood estimates and projections from the Environmental Impact report (EIR) for the City of Santa Barbara's *Plan Santa Barbara* General Plan Update, airport facilities are already vulnerable to inundation in a 100-year flood event under year 2000 baseline conditions[8]. Furthermore, the 2012 Santa Barbara Sea-Level Rise Vulnerability Study, looking ahead to the year 2100, states: "With a rising sea level, the frequency and magnitude of flooding in the Goleta Slough and Airport area can be expected to increase, (as it is an area projected) to be affected by a 100-year coastal flood with as much as 55 inches (1.4 meters) of sea level rise"[9].

The map below presents the predicted 100-year flood events for existing conditions correlated with the projected 2100 SLR scenario from the *Plan Santa Barbara* General Plan Update. The flooded areas are in blue[10]:

OCEAN-16 (cont'd)



100-Year Planning Horizons

The total period for the remediation projects covered by the *Draft 2015 City of Goleta Coastal Hazards Vulnerability Assessment and Fiscal Impact Report* extends nearly 100 years, from 2010 through 2100. For planning purposes, the entire period is broken up into four discreet "planning horizons." Each horizon corresponds to the onset of a specific time frame during which certain predicted impacts can be expected, and initiates with an onset year (2010, 2030, 2060, 2100) from which a specific remediation plan can be set in

OCEAN-17

[8] Griggs, Gary, and Nicole L. Russell (University of California, Santa Cruz). *City of Santa Barbara Sea-Level Rise Vulnerability Study,* California Energy Commission, Publication number: CEC-500-2012-XXX, 2012, p. 43

[9] Ibid

[10] City of Santa Barbara. *Certified Final Program Environmental Impact Report for the Plan Santa Barbara General Plan Update – Volume I,* AMEC Earth & Environmental, Inc., Sept. 2010, p. 18-11. <http://www.youplansb.org/docManager/1000000694/18.0_Global_Climate_Change.pdf>

motion[11]. The year 2010 is considered the first year of the first planning horizon, since the mapping of existing hazards was based on a LiDARi (Light Detection and Ranging) topographic survey dating from that year[12].

With each planning horizon year comes a predicted rise in sea level, increasing in severity over time. The SLR projections from the report are as follows:

- Commencing in 2030: As much as 1 foot
- Commencing in 2060: Around 2 feet
- Commencing in 2100: Around 5 feet

OCEAN-17 (cont'd)

Heal the Ocean submits that it is not too soon, at all, for serious long-range planning for the Santa Barbara Airport - whether it stays or is forced to be relocated elsewhere. We understand that under the EIR process there is no requirement to address sea-level rise and its effects, but we feel that the relocation of the airport is not being considered seriously enough. The fact that there is no legal obligation to plan for the (inevitable) effects of sea-level rise and climate change adequately does not mean that planners should avoid these considerations.

Thank you *very much* for this opportunity to comment.

Sincerely,

Hillary Hauser, Executive Director

Alex Bennett, Policy Associate

[11] *The 2015 City of Goleta Coastal Hazards Vulnerability Assessment and Fiscal Impact Report (Draft),* op. cit., Appendix A, pp. ES1-ES2

[12] Ibid., p. ES-2

Response to Recirculated Draft Program EIR - Letter 16
Heal the Ocean (OCEAN)
Dated September 16, 2016

*OCEAN-1 through OCEAN-12 are included in **Appendix A** of this Final Program EIR.*

OCEAN-13: This comment states that the organization is concerned that sea level rise (SLR) is only included in the Recirculated Draft Program EIR for "informational purposes" and that since the Program EIR discusses impacts to the floodways at the Airport, this proves that the discussion of SLR is actually being treated as more than just information.

Response: The floodways at the Airport, discussed in the Program EIR (Section 4.5 and Exhibit 4G), are related to the existing watershed during 100-year storm events, not increased flood risk from the sea. As stated in the response to a similar comment in **Appendix A** (OCEAN-4), the discussion of SLR in the Recirculated Draft EIR is provided for "information purposes" only based on *California Environmental Quality Act* (CEQA) case law. Pursuant to *California Building Industry Association (CBIA) vs. Bay Area Air Quality Management District (BAAQMD) (2015)*, CEQA analysis "is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents" (CBIA, 62 Cal. 4th at 97).

OCEAN-14: This comment states concerns that the Program EIR does not include estimations regarding sea elevation increases, land subsidence, or flood reduction success.

Response: The Program EIR incorporates by reference the Final *Goleta Slough Area Sea Level Rise and Management Plan* (Slough Management Plan) (2015) and includes its strategies related to the Airport as recommendations.

OCEAN-15: This comment provides detailed information regarding the City of Goleta's incorporation of California Coastal Commission guidance regarding preparation of a Coastal Hazards Vulnerability Assessment into an updated City of Goleta Local Coastal Plan (LCP). The comment then concludes that the Airport should fit in with the City of Goleta's Coastal Hazards Vulnerability Assessment.

Response: While located adjacent to the City of Goleta, the Airport is under the jurisdiction of the City of Santa Barbara. The City of Santa Barbara has a *Climate Action Plan* (2012), which includes a chapter on SLR. Adaptation measures that would be applicable to the Airport are similar to those identified in the Slough Management Plan and this Program EIR (i.e., strengthening in place, or elevation of, infrastructure, such as transportation and buildings). The

City is also in the process of updating its LCP to incorporate SLR adaptation actions. However, since the Airport is covered by its own LCP, it is possible that SLR adaptation actions for the Airport will not be incorporated until the Airport LCP is updated.

OCEAN-16: This comment summarizes available information regarding flood estimates and projections of future SLR at the Airport.

Response: Comment noted.

OCEAN-17: This comment provides information from the City of Goleta's *Draft 2015 City of Goleta Coastal Hazards Vulnerability Assessment and Fiscal Impact Report* and concludes that it is time to consider relocation of the Airport.

Response: Comment noted.

CITY OF SANTA BARBARA
AIRPORT COMMISSION

M I N U T E S
July 20, 2016

CALL TO ORDER

The Meeting on Wednesday, July 20, 2016 was called to order at 6:00 p.m. in the Airport Administration Conference Room - 601 Firestone Road, Santa Barbara

ROLL CALL

Airport Commissioners: Carl Hopkins, Craig Arcuri, Karen Kahn, Kirk Martin, and Jim Wilson

Staff: Hazel Johns, Airport Director
Tracy Lincoln, Airport Operations Manager
Jeff McKee, Airport Facilities Manager
Deanna Zachrisson, Airport Business Development Manager
Rebecca Fribley, Senior Property Management Specialist

Absent: Commissioners Dolores Johnson and Bruce Miller

CHANGES TO THE AGENDA

PUBLIC COMMENT

1. No one wished to speak.

CONSENT CALENDAR

2. Subject: Minutes

Recommendation: That Airport Commission waive the reading and approve the minutes of the special meeting of Wednesday, May 25, 2016.

3. Subject: Lease Agreement - Above All Aviation

Recommendation: That Commission authorize the Airport Director to execute a one-year and seven-month lease agreement with Above All Aviation, LLC, a California "C" Corporation, effective August 1, 2016 and ending April 30, 2018, for 18,691 square feet of aviation ramp, including one 3,522 square foot hangar and one 3,000 square foot hangar, at 101 Cyril Hartley Place, for a monthly rental of $4,290 per month exclusive of utilities.

4. Subject: Lease Agreement - Summer Solstice Celebration, Inc.

Recommendation: That Commission approve and authorize the Airport Director to execute a month-to-month Lease Agreement with Summer Solstice Celebration, Inc., a California Non-profit Corporation, for two parking spaces, adjacent to the Super 8 Motel, at 405 So.

Fairview Avenue, at the Santa Barbara Airport, effective July 21, 2016, for a monthly rental of $131, exclusive of utilities.

5. Subject: Lease Agreement - Transportation Security Administration

Recommendation: That Commission approve and authorize the Airport Director to execute a five (5) year Lease Agreement with the General Services Administration (GSA) for the Transportation Security Administration for 988 square feet of office, breakroom, classroom, and storage space in the Airline Terminal, at 500 James Fowler Road, at the Santa Barbara Airport, effective August 1, 2016, for a monthly rental of $8,826.

6. Subject: FY2017 Airport Commercial/Industrial Lease Rates

Recommendation: That Airport Commission approve the proposed Fiscal Year 2017 Commercial/Industrial Rental Rates, for land and buildings at the Santa Barbara Airport.

7. Subject: Property Management Report – May & June 2016

Recommendation: That Airport Commission receive the monthly Airport Property Management Report.

ACTION: Motion/Second for approval of the Consent Calendar by Commissioners Kirk Martin/Jim Wilson. Unanimous voice vote (Absent Commissioners Johnson and Miller).

NOTICES

8. That on Thursday, July 14, 2016 at 5:00 p.m., the Airport Commission Secretary duly posted this agenda on the bulletin board at Airport Administration.

LIAISON REPORTS

City of Santa Barbara Liaison Councilmember Frank Hotchkiss
City of Goleta Liaison Councilmember Michael T. Bennett

ACTION: Presented by both Councilmembers

ADMINISTRATIVE REPORTS

9. Subject: Surf Air

Recommendation: That Airport Commission receive a presentation from Surf Air representatives.

ACTION: Presented

10. Subject: Airport Advertising Agreement with Clear Channel Airports

Recommendation: That Airport Commission recommend approval to City Council and authorize the Airport Director to execute a five (5) year with one 5-year option agreement

with Inerspace Services, Inc. dba Clear Channel Airports to sell specific advertising space in the Airport terminal, for a minimum annual guarantee of $7,500 or 20% of gross.

ACTION: Motion/Second for approval by Commissioners Jim Wilson/Kirk Martin. Unanimous voice vote (Absent Commissioners Johnson and Miller).

PUBLIC HEARINGS

11. Subject: Airport Master Plan Draft Environmental Impact Report (EIR)

Recommendation: That Airport Commission hold a public hearing to take public comments on the Draft Environmental Impact Report for the Santa Barbara Airport Master Plan.

No action will be taken at this hearing on the environmental review or the Draft Master Plan.

ACTION: Public Comment period was opened and closed with no one wishing to speak. Presentation given by Airport Staff.

DIRECTOR'S REPORT

12. A. Airport Operations
- Passenger Count
- Aircraft Operations
- Air Freight

B. Programs
1. Marketing & Communications Program
2. Master Plan
3. Wildlife Hazard Assessment

C. Capital Projects
1. Airfield Electrical, Safety, and Fence Project
2. 6100 Hollister Avenue Development
3. Airline Terminal Solar Project
4. NOAA Project
5. D & G Car Dealership Project
6. Direct Relief – Purchase and Sale Agreement
7. Wings Sculpture

D. Financial Summary
E. City Council / Airport Commission Actions
F. Safety, Enforcement, and Protection

ACTION: Presented

ADJOURNMENT – 6:58 p.m. on order of Chair Hopkins

Hazel Johns
Airport Director

Rebecca Fribley
Sr. Property Management Specialist

City of Santa Barbara
Planning Division

PLANNING COMMISSION MINUTES

September 1, 2016

CALL TO ORDER:

Chair Campanella called the meeting to order at 1:01 P.M.

I. ROLL CALL

Chair John P. Campanella, Vice-Chair June Pujo, Commissioners Jay D. Higgins, Mike Jordan, Sheila Lodge, Deborah L. Schwartz, and Addison Thompson.

Absent: Commissioner Mike Jordan

STAFF PRESENT:

Beatriz Gularte, Senior Planner
N. Scott Vincent, Assistant City Attorney
Jessica Grant, Project Planner
Andrew Bermond, AICP, Project Planner
Steven Greer, Environmental Planner
Julie Rodriguez, Planning Commission Secretary
Jennifer Sanchez, Commission Secretary

II. PRELIMINARY MATTERS:

A. Requests for continuances, withdrawals, postponements, or addition of ex-agenda items.

None.

B. Announcements and appeals.

Ms. Gularte announced that the Staff Hearing Officer's decision on 246 San Clemente has been appealed to the Planning Commission. A hearing date will follow.

C. Comments from members of the public pertaining to items not on this agenda.

Chair Campanella opened the public hearing at 1:02 P.M. and, with no one wishing to speak, closed the hearing.

III. CONSENT ITEM:

ACTUAL TIME: 1:02 P.M.

APPLICATION OF EVA TURENCHALK, AGENT FOR KRACH-BASTIAN FAMILY TRUST, 3407 SEA LEDGE LANE, APN 047-082-010, A-1 ONE-FAMILY RESIDENCE AND SD-3 COASTAL ZONES, GENERAL PLAN LOCAL COASTAL PLAN DESIGNATION: RESIDENTIAL (1 DU/AC) (MST2016-00080/CDP2016-00003)

The proposed project involves the permitting of five (5) "as-built" king palm trees on a 1.05-acre bluff-top parcel. No additional development of the existing single-family residence is proposed. The project addresses violations identified in enforcement case ENF2015-00998.

The discretionary application required for this project is a Coastal Development Permit (CDP2016-00003) to allow the proposed development in the Appealable Jurisdiction of the City's Coastal Zone (SBMC § 28.44.060).

The Environmental Analyst has determined that the project is exempt from further environmental review pursuant to the California Environmental Quality Act Guidelines Section 15304 (Minor Alterations to Land).

Contact: Jessica Grant, Project Planner
Email: JGrant@SantaBarbaraCA.gov Phone: (805) 564-5470, extension 4550

MOTION: Lodge/Schwartz
Waive the Staff Report.
This motion carried by the following vote:

Ayes: 6 Noes: 0 Abstain: 0 Absent: 1 (Jordan)

Jessica Grant, Project Planner, responded to the Commission's questions.

Chair Campanella opened the public hearing at 1:24 P.M., and with no one wishing to speak the public hearing was closed.

MOTION: Lodge/Higgins **Assigned Resolution No. 022-16**
Approved the project, making the findings for the Coastal Development Permit as outlined in the Staff Report, dated August 25, 2016, subject to the Conditions of Approval in Exhibit A of the Staff Report with the following revisions to the Conditions of Approval:

1. Delete Condition B.1.
2. Change Condition B.2. to replace "should" with "shall".
3. Change Condition B.3 to replace "should" with "shall".

The motion was amended to include:

4. Add Condition **C. Irrigation System Maintenance.** The irrigation system shall be maintained to prevent a system failure. Watering of vegetation on the bluff shall be kept to the minimum necessary for palm tree survival.

This motion carried by the following vote:

Ayes: 5 Noes: 1 (Pujo) Abstain: 0 Absent: 1 (Jordan)

Chair Campanella announced the ten calendar day appeal period.

IV. NEW ITEM:

ACTUAL TIME: 1:30 P.M.

APPLICATION OF PATSY STADLEMAN PRICE, AGENT FOR MARK NATION, GOLETA WEST SANITARY DISTRICT, 100 CLYDE ADAMS ROAD, APN 073-450-003, AVIATION FACILITIES (A-F) AND COASTAL ZONE OVERLAY (S-D-3) ZONES, LOCAL COASTAL PLAN LAND USE DESIGNATION: RECREATIONAL OPEN SPACE (MST2013-00379, CDP2013-00007)

The project consists of reconstruction of a decommissioned pump structure and expansion of a vehicle garage at the Goleta West Sanitary District (GWSD) facility in the Appealable Jurisdiction of the California Coastal Zone on Santa Barbara Airport property. The pump structure would include a 396 square foot (sf) surface addition and a 2,784 sf subsurface demolition (fill). The equipment garage would be expanded by 900 sf. The GWSD facility is located north of the University of California Police Department and Santa Barbara County Fire Station #11 and is accessed via UC Santa Barbara parking lot 32.

The discretionary application required for this project is a Coastal Development Permit (CDP2013-00007) to allow the proposed development in the Appealable Jurisdiction of the City's Coastal Zone (SBMC §28.44.060).

The Environmental Analyst has determined that the project is exempt from further environmental review pursuant to the California Environmental Quality Act Guidelines Section 15301(e) of the California Environmental Quality Act (CEQA) Guidelines, which allows for small additions to existing structures.

Contact: Andrew Bermond, AICP, Project Planner
Email: ABermond@SantaBarbaraCA.gov Phone: (805) 564-5470, extension 4549

Andrew Bermond, AICP, Project Planner, gave the Staff presentation.

Steve Amerikaner, Counsel for the Goleta West Sanitary District introduced the Applicant team: Mark Nation, General Manager; Eduardo Galindo, Architect; and Patsy Stadleman Price, Land Use Planner. Ms. Price continued the Applicant presentation.

Chair Campanella opened the public hearing at 1:54 P.M.

MOTION: Thompson/Lodge **Assigned Resolution No. 023-16**
Approved the project, making the findings for Coastal Development Permit as outlined in the Staff Report, dated August 25, 2016, subject to the revised Conditions of Approval distributed to the Commission on August 30, 2016.

This motion carried by the following vote:

Ayes: 6 Noes: 0 Abstain: 0 Absent: 1 (Jordan)

Chair Campanella announced the ten calendar day appeal period.

V. ENVIRONMENTAL HEARING:

ACTUAL TIME: 1:58 P.M.

SANTA BARBARA AIRPORT MASTER PLAN (MASTER PLAN) RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT (MST2013-00453)

The project site is located at the Santa Barbara Airport (601 Norman Firestone Road). The Santa Barbara Airport Master Plan (Master Plan) provides guidance for the Airport's overall development for the next 15-20 years, (i.e., 2014 to 2032). The Master Plan relies on Federal Aviation Administration (FAA)-approved forecasts of aviation activity at the Santa Barbara Airport (Airport) and provides development scenarios for the short term (2017), intermediate term (2022) and long term (2032). These development scenarios are not only reflective of the level of activity forecast to occur at the Airport, but are dependent on federal funding cycles and the availability of grant money for aviation projects.

The proposed Master Plan consists of:

- Airfield Recommendations: Extension of Taxiway H to the west, parallel to the main instrument runway, restriping of existing paved areas, paving light lanes along taxiway edges, and relocating entrances and exits from the taxiway system to comply with Federal Aviation Administration (FAA) recommendations.
- North Landside Recommendations: Consolidation of general aviation operations to facilitate two Fixed Base Operator (FBO) lease areas on the northeast portion of the airfield to provide tenant and visiting private aircraft services and facilities, and support facility changes including the relocation of the Airport Maintenance Yard.
- Terminal Area Recommendations: Construction of a new Long Term Parking Lot south of the Airline Terminal to accommodate 1,315 new or relocated parking spaces, expansion of the Airline Terminal, and relocation of the south-side FBO.

The Airport is located on approximately 948 acres adjacent to the City of Goleta and the University of California, Santa Barbara (UCSB) in the South Coast region of Santa Barbara County. Though incorporated in the City of Santa Barbara, the Airport is located eight miles to the west of the rest of the City of Santa Barbara. Due to the proximity of the Goleta Slough to certain proposed Master Plan project, approval of a Local Coastal Program (LCP) amendment will be necessary for some of the proposed actions. An LCP amendment will, therefore, be considered along with the proposed actions, as appropriate.

The public review of changes from the prior Draft EIR began Friday, July 15, 2016. Comments on the Recirculated Draft EIR must be received by Tuesday, **September 13, 2016.** The Draft EIR is recirculated because new Transportation/Traffic impacts (Impacts T-2 and T-3) were identified in response to previous public comment received (CEQA Guidelines §15088.5 (a)(1)). No action on the project will be taken at this hearing.

Following the end of the Recirculated Draft EIR public review period, a Final EIR including responses to comments to both the initial Draft EIR and the Recirculated Draft will be prepared, and subsequent noticed public hearing will be held at Planning Commission to consider actions to approve the project.

Contact: Andrew Bermond, AICP, Project Planner
Email: ABermond@SantaBarbaraCA.gov Phone: (805) 564-5470, extension 4549

Andrew Bermond, AICP, Project Planner, gave the Staff presentation.

Carl Hopkins, Airport Commission Chair, gave a PowerPoint presentation representing the Airport Commission's position that it is unnecessary to retain World War II Hangars 1, 2 and 3 as Structures of Merit. They prefer to only retain Hangar 3 as a potential Structure of Merit. The removal of Hangars 1 and 2 is necessary to provide adequate ramp space as proposed in the Airport Master Plan and adequate FAA approved access to the planned additional T-hangars.

Chair Campanella opened the public hearing at 2:24 P.M.

The following people commented on the project:

1. Gordon Feingold, Santa Barbara Airport pilot, supports the Airport Master Plan. He appreciates the historical significance but only supports retaining Hangar 3. Removal of the hangars is necessary for the extension of Taxiway H, which is a safety issue. Taxiway H has the ability to prevent accidents. GF-2
2. Jenna Driscoll, Santa Barbara Channelkeeper, will be submitting written comments. Channelkeeper does not believe the mitigation measures proposed in the draft recirculated EIR are sufficient to reduce environmental impacts. Many of their concerns with the Master Plan would be addressed if the final EIR included a mitigation measure that would require a separate EIR for the Taxiway H extension project. SBCH-14
3. Scott Cooper, Co-Chair of Audubon Society, will be submitting written comments. Ninety percent of coastal wetlands in California have been lost. As a consequence, AUD-56

there are many rules and regulations to protect resident species. Many apply to the Goleta Slough because it is the largest remaining sensitive wetland system in the state. The dilemma for city planners is balancing development and safety with environmental concerns. The proposed Airport Master Plan and EIR did not adequately balance these issues and have flawed or inadequate data and analysis, ongoing and proposed environmentally damaging activities, and a general disregard for the Goleta Slough Ecological Reserve. The impacts on forging rafters should be Class I.

AUD-56 (cont'd)

With no one else wishing to speak, the public hearing was closed at 2:33 P.M.

Chair Campanella called for a recess at 2:33 P.M and reconvened at 2:48 P.M.

The Commissioners made the following comments:

- Commissioner Higgins would like to see mitigation monitoring and reporting to the Planning Commission be included.
- Commissioner Pujo commented that the Wetland Mitigation and Monitoring Plan for mitigation measures to impacts BIO-1 and BIO-4 need better clarification of what the restoration and monitoring plan needs to look like and the criteria for success. More information is needed on those parameters that should be included and followed through.
- Commissioner Schwartz stated that with additional community input, we will raise the bar on environmental analysis, especially with any impacts on the Taxiway H safety project.
- Commissioner Campanella mentioned that the Airport has a designated wildlife coordinator and the report included was complimentary but said that additional improvements were necessary as we adapt to changing conditions on hazards, such as birds. More input from the environmental community and the designated wildlife coordinator, relative to the ecology, might set the stage for being more in concert when this returns to the Commission when looking at how to monitor, not just methods of mitigation, but long term monitoring. Things change and the environmental plan should consider ongoing changes.

Chair Campanella and the Planning Commission expressed appreciation for Staff's work on the Airport Master Plan and look forward to seeing it progress.

VI. ADMINISTRATIVE AGENDA

ACTUAL TIME: 3:46 P.M.

A. Committee and Liaison Reports

1. Staff Hearing Officer Liaison Report

   None was given.

2. Other Committee and Liaison Reports

a. Commissioner Campanella reported that there will be a Special Planning Commission Work Session on September 6, 2016.

b. Commissioner Campanella reported that the next Planning Commission meeting will be Thursday, September 8, 2016.

c. Commissioner Campanella reported that it was First Thursday and encouraged all to enjoy the downtown events.

VII. ADJOURNMENT

Chair Campanella adjourned the meeting at 3:47 P.M.

Submitted by,

Julie Rodriguez, Planning Commission Secretary

Master Plan Advisory Committee Members

Ms.	Deborah	Schwartz	Commissioner	Santa Barbara Planning Commission
Mr.	Mike	Jordan	Commissioner	Santa Barbara Planning Commission
Ms.	Debra	Andoloro	Princpal Planner	Community Development Department
Mr.	Marti	Milan	Principal Civil Engineer	City of Goleta
Mr.	Jeffery	Hunt	Director	Santa Barbara County Long Range Planning Department
Mr.	Peter	Imhof	Deputy Director, Planning	Santa Barbara County Association of Governments
Mr.	Kirk	Martin	Commissioner	Santa Barbara Airport Commission
Mr.	Bruce	Miller	Commissioner	Santa Barbara Airport Commission
Mr.	William	Gilbert		
Mr.	Carl	Hopkins		General Aviation Community
Ms.	Peggy	Redmond	Manager	Red Baron Flight School
Mr.	Matt	Long	Manager	Signature Flight Support
Mr.	Roger	Rondepierre	Manager	Atlantic Aviation
Mr.	Gordon	Feingold		Aircraft Owners and Pilots Association
Mr.	Todd	Smith	ATC Manager	FAA Air Traffic Organization
Mr.	Warren	Miller		Noise Committee Representative
Mr.	Jeff	Spach	Federal Security Director	Transporation Security Administration
Ms.	Tim	Hester	Airport Planner	FAA Western-Pacific Region
Mr.	Marc	Fisher, AIA	Senior Associate Vice-Chancellor for Campus Design & Facilities	Office of the Vice Chancellor, Administrative Services
Mr.	Phil	Bernstien		Aviation Business Community
Ms.	Pat	Saley		Goleta Slough Management Committee
Ms.	Rachel	Couch		Goleta Slough Management Committee
Mr.	Dan	Burkhart	Director, Regional Programs	National Business Aviation Association

First meeting December 7, 2011
Six meetings
Four public meetings

Recirculated Draft Program Environmental Impact Report
On the Proposed Airport Master Plan
Sch# 2014061096
ES-2, Page 9

ES2.0 PROJECT DESCRIPTION

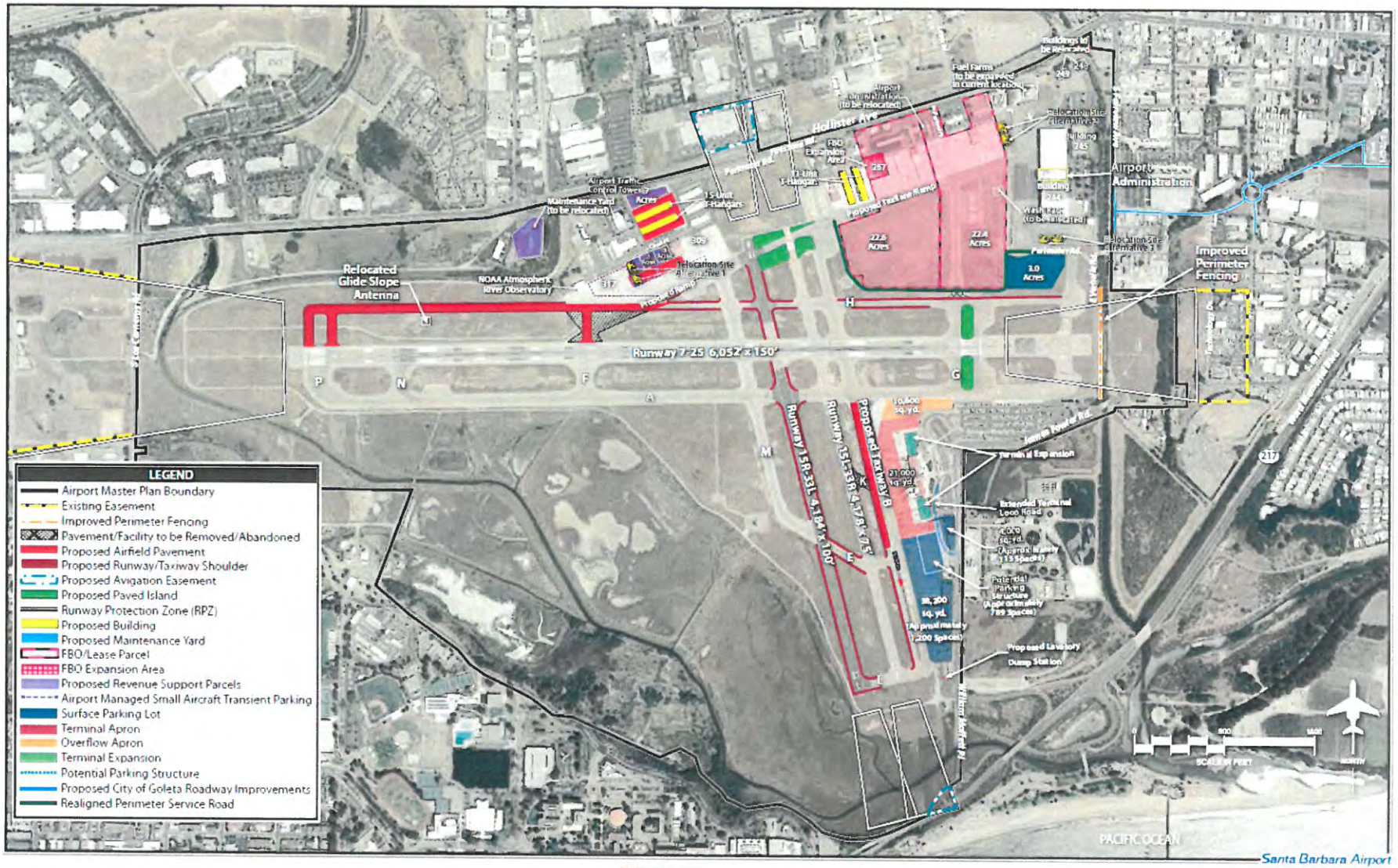
The City's Airport Department has identified the following specific goals for the Master Plan:

• Relocation of general aviation facilities and new general aviation improvements.

• Airfield safety improvements.

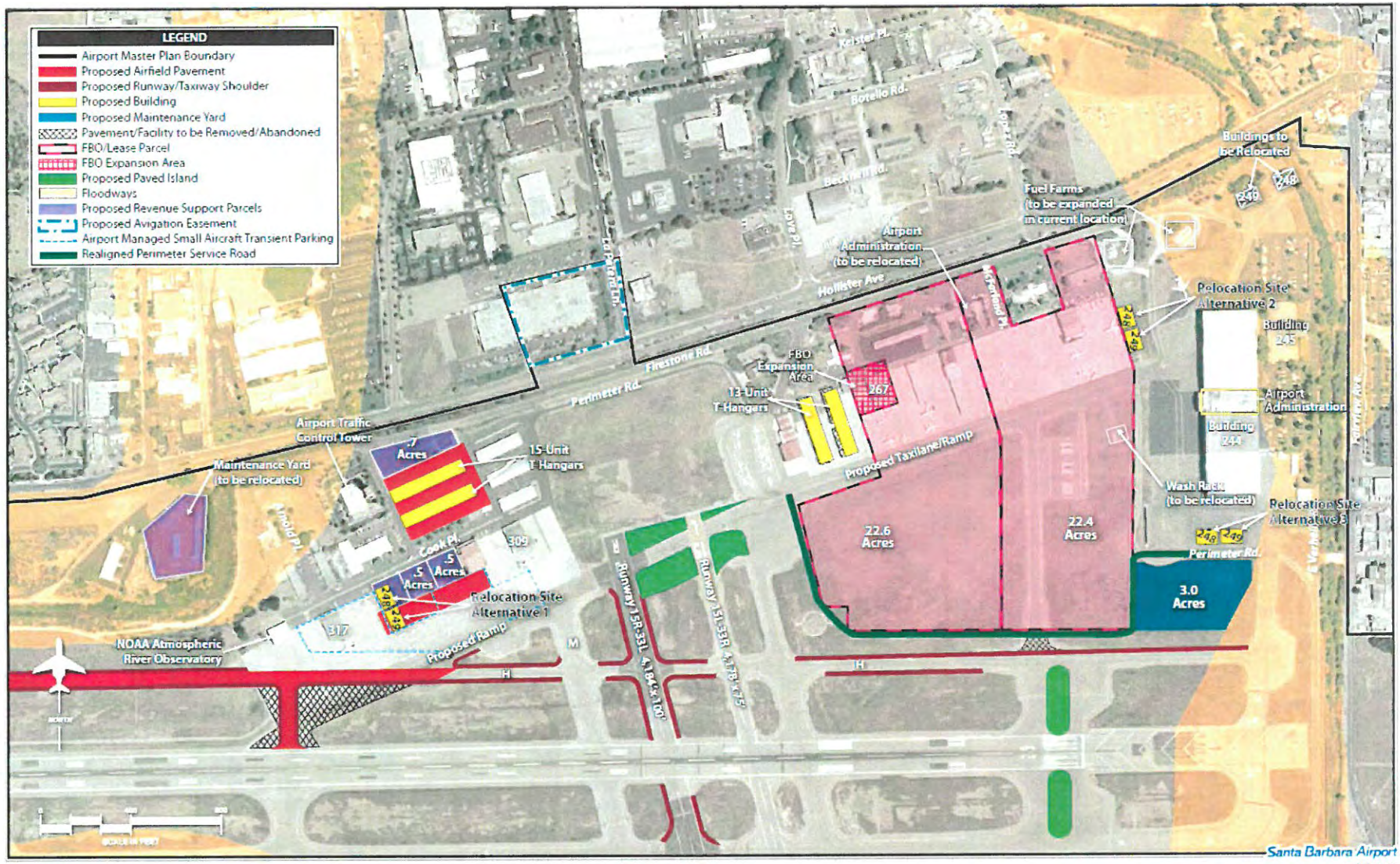
• Consolidation of automobile parking associated with the Terminal.

• Terminal expansion



REVISED

Exhibit 2B
RECOMMENDED DEVELOPMENT CONCEPT OVERVIEW



REVISED

Exhibit 2E
RECOMMENDED NORTH LANDSIDE DEVELOPMENT CONCEPT

Santa Barbara Airport Master Plan Draft EIR Appendix E
Page E-4
Historic Structures Report
Prepared by
Applied Earthworks, Inc. Lompoc CA

Although MCAS Goleta served an important support role for the U.S. military during World War II, the station's squadron hangars (Buildings 121, 261, 267, 309, and 317) and storehouse (Building 268) do not appear to be eligible for inclusion in the California Register. However, Squadron Hangars No. 1, No. 2, and No. 3 (Buildings 317, 309, and 267) appear to be eligible for listing as Santa Barbara Structures of Merit for their contributions to the development of the airport and as the only examples of their architectural type in the city of Santa Barbara. As such, Buildings 317, 309, and 267 are historical resources for the purposes of CEQA. The Master Plan proposes to retainthese buildings resulting in a Class III, no significant impact.

- Hanger 3 is in good condition and currently being used as a maintenance hanger as it was in WWII.
- The proposal is to keep hanger 3. It is likely that it will continue to be used as a maintenance hanger for at least the next 5 years or more.
- Hangers 1 and 2 are in fair condition and require extensive and expensive work to maintain them even in fair condition.
- Hanger 1 substantially limits the number of flight school, transient, and tie down aircraft even if it is closed up and not used at all.
- Hanger 2 blocks access to planned future T hangers used by light general aviation.
- All of the hangers are behind the security fence and require an escort or security badge.
- These hangers are not suitable for today's airplanes and current uses.
- None of the hangers are very visible to the public.







It is the position of the Airport Commission that it is unnecessary to retain World War II hangers 1, 2, and 3 (buildings 317, 309, 267) as city structures of merit. We concur with the proposal to retain hanger 3 as a potential city structure of merit.

However, the removal of hanger 1 is likely to be needed in order to provide adequate ramp space for light general aviation as proposed in the master plan. This includes space for flight school planes, transient aircraft, and possible additional city tie downs.

The removal of hanger 2 is likely to be needed in order to provide adequate FAA approved access to the planned additional T hangers which will replace hangers on the South side of the airfield being removed for commercial operations.

This statement is being placed into the public record so as to provide timely notice to the planning commission and the city council of the likely future need to remove these two structures that are potential city structures of merit.

Response to Oral Comment 1, Gordon Feingold (GF)
City of Santa Barbara Planning Commission Hearing
September 1, 2016

*GF-1 is included in **Appendix A** of this Final Program EIR.*

GF-2: This comment restates the commenter's support of the Airport Master Plan and the Taxiway H Airfield Safety Project. It also states that he supports retaining only World War II hangar No. 3 (referred to as Building No. 267 in the Draft Program EIR).

Response: Thank you for your comment.

Response to Oral Comment 2, Channelkeeper (SBCH)
City of Santa Barbara Planning Commission Hearing
September 1, 2016

*SBCH-1 through SBCH-4 are included in **Appendix A** of this Final Program EIR; SBCH-5 through SBCH-13 are included previously in this appendix.*

SBCH-14: The commenter will be submitting written comments. However, they do not believe that the mitigation measures provided in the Recirculated Draft Program EIR are sufficient to reduce environmental impacts. Therefore, the Final Program EIR should include a mitigation measure that requires that a separate EIR for the Taxiway H Airfield Safety Project.

Response: Thank you for your comment. Please refer to Responses to Comments SBCH-5 through SBCH-13 as well as Topical Response #3. All projects recommended in the proposed Airport Master Plan that meet the definition of a project under the *California Environmental Quality Act* (CEQA) and need future discretionary approvals will be required to complete some level of environmental review. However, it is not appropriate for the type of environmental document to be determined at this time when neither the timing nor the design of such projects is available. The Taxiway H Airfield Safety Project would require a Local Coastal Plan (LCP) amendment, General Plan amendment, and rezone prior to the issuance of a Coastal Development Permit for the project. These tasks cannot be approved until the State environmental review process for all discretionary actions is complete.

Response to Oral Comment 3, Audubon (AUD)
City of Santa Barbara Planning Commission Hearing
September 1, 2016

*AUD-1 through AUD-32 are included in **Appendix A** of this Final Program EIR; AUD-33 through AUD-55 are included previously in this appendix.*

AUD-56: The commenter will be submitting written comments. The commenter does not believe that the proposed Airport Master Plan and Program EIR adequately balance development and safety with environmental concerns. He also thinks the proposed Airport Master Plan and Program EIR have flawed or inadequate data and analysis and a general disregard for the Goleta Slough Ecological Reserve.

Response: Thank you for your comment. Please refer to Responses to Comments AUD-1 through AUD-55 for responses to detailed written comments related to this oral summary comment.

Appendix C

DUDEK

621 CHAPALA STREET
SANTA BARBARA, CALIFORNIA 93101
T 805.963.0651 F 805.963.2074

TECHNICAL MEMORANDUM

To:	Andrew Bermond, City of Santa Barbara Airport Department Judi Krauss, Coffman Associates
From:	John Davis IV, Dudek Senior Ecologist
Subject:	Response to Comment on White-tailed Kites from the California Department of Fish and Wildlife for the Santa Barbara Airport Master Plan Project, Santa Barbara County, SCH #2014061096.
Date:	June 5, 2017
Attachment(s):	*Figure 1 – White-tailed Kite Occurrences Area* *Figure 2 – Cumulative Study Area*

This memorandum is in response to California Department of Fish and Wildlife (CDFW) comments on the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Santa Barbara Airport Master Plan, Santa Barbara County; SCH #2014061096 (August 6, 2014) and follow-up letters received in response to the Draft and Recirculated Draft Program EIRs (October 29, 2015, and September 12, 2016, respectively).

Under the Specific Comment "Taxiway H Feature," the CDFW expressed concern that the area on existing Goleta Slough Ecological Reserve proposed for expansion of Taxiway H supports foraging (or more accurately hunting) habitat for the white-tailed kite (*Elanus leucurus*; kite), which is a California fully protected species (CFGC Section 3511), and habitats near known nesting sites are essential to the species' survival and reproduction in the local and regional area. The CDFW further states that it would consider loss of foraging habitat near known nests to be significant at the project level and to add to cumulative habitat losses in the surrounding area.

This memorandum responds to this comment and concludes: (1) available evidence suggests that low quality foraging habitat for the white-tailed kite exist along Taxiway H, (2) the proposed Taxiway H is located at the extent of typical foraging distances from known kite nesting locations, and (3) the impacts to low quality foraging habitat from development of the proposed extension of Taxiway H would not contribute substantially to the cumulative impact to white-tailed kite foraging habitat in the region.

BACKGROUND

In preparing this memorandum, Dudek reviewed the following documents:

- *Recirculated Draft Program Environmental Impact Report on the Proposed Airport Master Plan for Santa Barbara Municipal Airport, Santa Barbara, California* (City of Santa Barbara 2016);
- California Natural Diversity Database (CDFW 2017);
- *Santa Barbara Airport Wildlife Hazard Assessment* (WHA; Dudek et al. 2016), including raw database;
- *Wildlife Hazard Management Plan* (WHMP; City of Santa Barbara 2017);
- *Raptor and Bird Nesting Survey Report for the University of California, Santa Barbara Long Range Development Plan West Storke Campus* (Dudek 2013);
- County of Santa Barbara Cumulative Projects List (County of Santa Barbara 2017) and associated environmental documents;
- City of Goleta Cumulative Projects List (City of Goleta 2016) and associated environmental documents;
- Santa Barbara Breeding Bird Study (Holmgren and O'Loghlen 2017); and
- Additional resources on white-tailed kite natural history (as provided in the references).

RESPONSE TO COMMENT

The proposed extension of Taxiway H (and a relocated glide scope antenna), identified in the Program EIR as the Taxiway H Airfield Safety Project (Taxiway H project) would occur within a maintained annual brome grasslands with low biological diversity in the northwestern portion of the Santa Barbara Airport (airport) (Exhibit 4B, City of Santa Barbara 2016). Construction would result in disturbance of 12.4 acres of potential kite foraging habitat. The 12.4 acres is composed of 3.5 acres pavement, 2.6 acres shoulder, and 6.3 acres for grading within the taxiway object free area (TOFA)(Exhibit 2D, City of Santa Barbara 2016). White-tailed kites are known to use a variety of open habitats for foraging (e.g., grasslands, wetlands dominated by grasses, low shrub) that contain their preferred small mammal prey: California voles, western harvest mouse, and house mouse (Dunk 1995, Lehman 2017). The Recirculated Draft Program EIR states that kites are encountered occasionally near the area proposed for the Taxiway H Airfield

Safety Project (City of Santa Barbara 2016, p. 4-36). Recent observations during the Wildlife Hazard Assessment (WHA; Dudek et al. 2016) show that kites were virtually absent from the area. During point count surveys conducted four times monthly between December 2014 and November 2015 single kites were observed eight times on the entire Santa Barbara Airport property, only one of these observations was potentially within the proposed Taxiway H, as discussed below (Dudek et al. 2016, Appendix D). Methods for these surveys are designed for determining general areas and habitats where wildlife activity occurs, so locations were recorded only to the level of grid squares within a grid pattern provided by the Santa Barbara Airport.

According to WHA raw data, all white-tailed kite observations were recorded from August 17 to October 14, 2015. Although kite breeding activity in the Goleta area has sometimes been documented within this period, the absence of kites prior to mid-August in 2015 suggests the observations were related to post-breeding dispersal, not foraging by breeding kites. Nearly all observations, if not all, were of individuals in areas south of Runway 7-25. Only two observations were recorded within grid squares overlapping the Taxiway H project site, but one of these was recorded as in "marsh" and within grid square X7 (*Figure 1*), so occurred within Goleta Slough south of Runway 7. Therefore, this individual was not in the immediate Taxiway H project vicinity. One white-tailed kite observed on August 25, 2015, was recorded perched on a shrub in grid square W7 and may have been north of Runway 7, where such perch sites occur just north of the location of proposed Taxiway H project impacts. Therefore, only one white-tailed kite observed during the year-long survey effort was potentially in the immediate Taxiway H project vicinity. It should be noted that kites are easily detected when present, and that the lack of observations during intensive point count surveys at least demonstrates they are not using this portion of the Taxiway H project site frequently.

The proposed Taxiway H location contains low quality habitat for the white-tailed kite and its prey. In addition to infrequent white-tailed kite observations, suitable prey were in extremely low abundance. Kite prey at the proposed Taxiway H project site, as well as other non-prey rodent species (i.e., Botta's pocket gopher) are likely to remain at low levels consistent with implementation of the wildlife hazard management plan in airport safety areas. The WHA recorded an extremely low abundance of suitable prey items for white-tailed kites during small mammal trapping in the annual brome grassland along the proposed Taxiway H extension (Dudek et al. 2016). During two trapping nights in April 2015 and two nights in November 2015, only one suitable prey item (a single western harvest mouse, *Reithrodontomys megalotis*) was captured in Grid 4 within this area (*Figure 1*; Dudek et al. 2016). In addition to evidence that small mammal populations, specifically white-tailed kite prey, are extremely low in the Taxiway H project site, the Santa Barbara Airport's WHMP (City of Santa Barbara 2017) requires that the airport monitor rodent populations on the airfield and implement a periodic control program. The

airport is obligated to adhere to its WHMP as part of requirements to maintain its certification as a Part 139 airport. Although white-tailed kites are known to forage in the vicinity, the maintained brome grasslands along the proposed Taxiway H extension only provide low quality foraging habitat for this species, which may have contributed to the white-tailed kite's absence or near absence during point count surveys (kite abundance is ultimately regulated by prey abundance; Dunk 1995, Waian and Stendall 1970).

White-tailed kites may forage over large distances outside the nesting season. However, it has been observed that they seldom forage farther than a 0.5-mile radius from the nest site (Hawbecker 1942; also see territory sizes in Dunk 1995). If enough food is present, an area of about 20 acres[1] of mouse pasture is large enough to support a pair of nesting kites and their young (Dixon et al.1957). Despite extensive efforts since the 1990s to document nesting kites in the Goleta area, no nests have been documented less than approximately 0.4 miles from the proposed Taxiway H extension. Nests have been observed in several areas between 0.4 and 0.7 miles from the Taxiway H project site since 1990s, including the vicinity of Basins I and J in Goleta Slough, the vicinity of Harder Stadium at the University of California, Santa Barbara (UCSB), and at West Storke Family Housing, UCSB (*Figure 1*). Nest locations have varied from year to year, so several locations are associated with each area. In only one or two years (1997 and 2012) have active nests been detected in more than one of these areas. However, in most years only one kite territory is present in these areas.

The nearest nest to the Taxiway H project site for each area is as follows: Basins I and J, 0.49 miles; Harder Stadium, 0.40 miles; and West Storke Campus, 0.58 miles. Each of these distances is to the nearest point of the Taxiway H project site. For example, while the nearest nest at Basins I and J is approximately 0.49 miles from the nearest point of the site, nearly all of the Taxiway H project site is 0.5 miles or more from this nest location. Therefore, while a portion of the Taxiway H project site may partly be within the foraging range of nesting white-tailed kites in some years, it is generally out of the typical foraging range for nesting individuals in the area.

In conclusion, although brome grasslands like those present on the Taxiway H project site are considered to provide suitable foraging for kites in their unaltered or grazed conditions, the lack of small mammals, especially kite prey, encountered during trapping efforts, the absence of kites during a year-long survey (including their complete absence from the airport prior to mid-August), and the distance of the Taxiway H project site from known nest locations suggest that the area provides only low quality foraging habitat for nesting white-tailed kites. In addition to

[1] Approximately 0.1-mile radial distance from a nest, assuming a 20-acre territory is circular and nest is in the center.

the habitat quality and distance to nesting kites, relative to the amount of available habitat in the region, the impact to 6.1 acres of annual brome grassland would be relatively small, as discussed below. These factors indicate that Taxiway H project impacts to kite nesting would be less than significant.

CUMULATIVE IMPACT ANALYSIS

As noted above, the future construction of Taxiway H and glide slope antenna would result in a permanent loss of 6.1 acres of potential kite foraging habitat. Relative to the amount of available habitat in the region, this impact is small. Here we provide a cumulative impact analysis to examine the extent of kite foraging habitat that has or is anticipated to be impacted in the region.

Under California Environmental Quality Act (CEQA), an EIR must discuss cumulative impacts of a project if the project's incremental effects are significant when viewed in connection with the effects of past projects, current projects, and probable future projects (14 CCR 15130(a) and 15065(a)(3)). When this occurs, the project's impacts should be identified as "cumulatively considerable."

The cumulative impact analysis provided below utilizes a "list-of-projects" approach, which focuses on regional impacts to suitable foraging habitat for white-tailed kites within a defined "Cumulative Study Area" (*Figure 2*). This study area encompasses the area potentially used by white-tailed kites in the Goleta Valley. It includes the City of Goleta (City), UCSB, and areas under County of Santa Barbara jurisdiction extending from Dos Pueblos Canyon east to the City of Santa Barbara western boundary. Projects considered include those within the Cumulative Study Area and provided in cumulative projects lists by the City and County. Since the City and County do not maintain GIS boundary records for projects in their jurisdiction, all environmental documents pertaining to projects within the Cumulative Study Area were reviewed. Projects within the Cumulative Study Area with potential kite foraging habitat that has been or is anticipated to be impacted is provided in *Table 1* and shown on *Figure 2*.

Table 1 provides a broad overview of the amount of kite foraging habitat that has been or may be impacted in the Cumulative Study Area. Since environmental documents are not required to report on impacts to non-sensitive vegetation communities (e.g., non-native grasslands), impact acres were estimated utilizing any information available for a given project (e.g., project descriptions, figures, impact discussions, etc.), including local knowledge of the area. Although the primary habitat considered in project reviews included grassland habitat, open scrub or agriculture is often considered suitable foraging habitat. However, it is important to note that (1) kites have not been observed to use agriculture frequently in the Cumulative Study Area, and (2) many scrub habitats listed in *Table 1* may be too dense for this species and potentially not

suitable. Therefore, the acres presented below may overestimate the overall cumulative impacts to foraging habitat in the Cumulative Study Area, which would suggest that the actual impacts to foraging habitat may be less than presented below. Also note that vegetation shown in *Figure 2* is provided only for context of impacts in *Table 1*. As project boundaries were not available for all projects in this analysis, impact calculations in the current analysis are based on the description of impacts provided in environmental analysis for the various projects.

Overall, an estimated total of approximately 498 acres of suitable kite foraging habitat has been or is anticipated to be impacted in the region by past, present, or probable future projects (*Table 1*). Within the Cumulative Study Area annual grasses and forbs alone account for over 4,500 acres (*Figure 2*), which suggest that suitable foraging habitat is still plentiful in the region. Taxiway H project permanent impacts to 6.1 acres of potential foraging habitat for white-tailed kites would not contribute substantially to the overall impacts to approximately 498 acres from past, current, and probable future projects. In addition, as described above, the potential foraging habitat that would be removed by a future Taxiway H project is low quality and not essential for nesting white-tailed kites, based on the lack of observations in the area, the apparent low numbers of suitable prey, and the distance of this area from known kite nesting locations. Therefore, when considered with all projects in the region, the construction of Taxiway H (permanent disturbance area of 6.1 acres of marginal foraging habitat for kites) would not significantly contribute to the cumulative impacts to kite foraging habitat.

Table 1
Projects within Cumulative Study Area with Potential Foraging Habitat

Project No.	Project (Case No.)	APN	Project Status[1]	Select Habitat Present[2]	Acres Foraging Habitat Impacted
1	Village at Los Carneros (10-043-DP- et al.)	073-330-024, -026, -027, -028, -029	Under construction	NNG, CBS	35.75
2	Rincon Palms Revised Hotel/Conference Center (11-083-DP RV)	073-140-004	Under construction	NNG	3.06
3	Citrus Village (04-226-TM, -DP)	077-490-043	Under construction	RG	0.94
4	Marriott Residence Inn (09-075-TPM, -DP and 09-079-DP AM)	073-050-020	Under construction	NNG	1.9
5	Islamic Society of SB (03-051-RZ, -DP, -CUP)	077-160-035	Approved (Not Constructed)	NNG (RG)	0.49
6	Cortona Apartments (09-140-DP)	073-140-016	Approved (Not Constructed)	NNG	6.17
7	UCSB Long Range Development Plan (SCH No. 2007051128)	Multiple	Under Construction	NG, NNG, RD	37.8[3]
8	Shelby Residential Project (05-154-GPA, -RZ, -VTM)	077-530-019	Pending	NNG	0.42
9	Kenwood Village (08-205-GPA, -RZ, -VTM)	077-130-066, -019; 077 -141 -049	Pending	NNG	9.45
10	Heritage Ridge (14-049-, -VTM, -DR, -CUP)	073-060-031 through -043	Pending	CBS, QBS, UM, *Bromus-Brachypodium distachyon* Herbaceous Semi-Natural Alliance	14.24
11	Hollister Village Apartments	073-030-026, -	Pending	NNG	21.7

Table 1
Projects within Cumulative Study Area with Potential Foraging Habitat

Project No.	Project (Case No.)	APN	Project Status[1]	Select Habitat Present[2]	Acres Foraging Habitat Impacted
	(16-029-GPA-RZ-LLA DPAM)	027, -028, -033			
12	Blickley Lot Split (14NGD-00000-00010)	059-440-012, 059-440-014	County Archived	NG, NNG/OW	3.75
13	Cavaletto Tree Farming Housing Project (01GPA-00000-00009, 01RZN-00000-00015, 08DVP-00000-00012, 09TRM-00000-00001, 09RDN-00000-00001)	069-100-006, -051, -054, -057.	County Archived	NNG	22.4
14	Paradiso del Mare Ocean and Inland Estates (06CDH-00000-00038, 06CDH-00000-00039, 07CUP-00000-00065, 09CDP-00000-00045, 10CUP-00000-00039 and 10CDP-00000-00094)	079-200-004 and 079-200-008	County Archived	ABG, CBS, CSS, MF, HGS	26.5
15	Park Hills Estates (10TRM-00000-00001)	059-290-041	County Archived	AG, PNGG, CBS	13.71
16	SB Land & Ranching Co. Fencing Project (13NGD-00000-0019/12CDH-00000-00039)	079-160-046, -045, -021, -038, 079-170-031 through -045, 079- 180-031	County Archived	AG, NG, PNGG	22.4
17	Santa Barbara Ranch	Multiple	County Archived	CS, NG, NNG	138.12

Table 1
Projects within Cumulative Study Area with Potential Foraging Habitat

Project No.	Project (Case No.)	APN	Project Status[1]	Select Habitat Present[2]	Acres Foraging Habitat Impacted
	Project (MOU Project) (04EIR-00000-00014)				
18	So Cal Gas Storage Enhancement Project (10EIR-00000-00001)	071-210-001	County Archived	AG	1.38
19	Ballantyne Single Family Residence (05LUP-00000-00611, 06APL-00000-00045, and 08CDP-00000-00006)	079-090-036	Completed	NGG, small CBS	0.37
20	More Mesa Biological Resource Study (N/A)	065-320-001, -002, -007, -008, -009, and -010	Completed	AG, CB, MB, PNGG, CBS, SB, CLO, Ruderal	40
21	St. Athanasius Orthodox Church (01CUP-00000-00152)	071-140-072	Completed	CF	5.35
22	Cabrillo Business Park (37-SB-RZ, -TM, -DP, -OA, -RN.)	073-450-005	Completed	NNG, wetlands	92.25

[1] County Archived includes those archived projects (status unknown)
[2] Vegetation Types: AG = annual grasslands, ABG = annual brome grasslands, CS = coastal scrub, CB = California brome, CBS = coyote brush scrub, CF = cultivated fields, CLOW = coast live oak, CSS = California sagebrush scrub, DIST = disturbed, HGS = Harding grass swards, MB = meadow barley, MF = mustard fields, NG = native grasslands, NNG = non-native grassland, PNGG = purple needle grass grassland, QBS = quail brush scrub, RD = ruderal, RG = ruderal grasses, UM = upland mustard, OW = oak woodlands, SB = seacliff buckwheat
[3] Includes project acres for North Campus Faculty Housing (23 acres) and Sierra Madre Family Housing (14.8 acres)(UCSB 2014, UCSB 2008). All project impact acres included in total (some of which may include small amounts of habitat not suitable for foraging).

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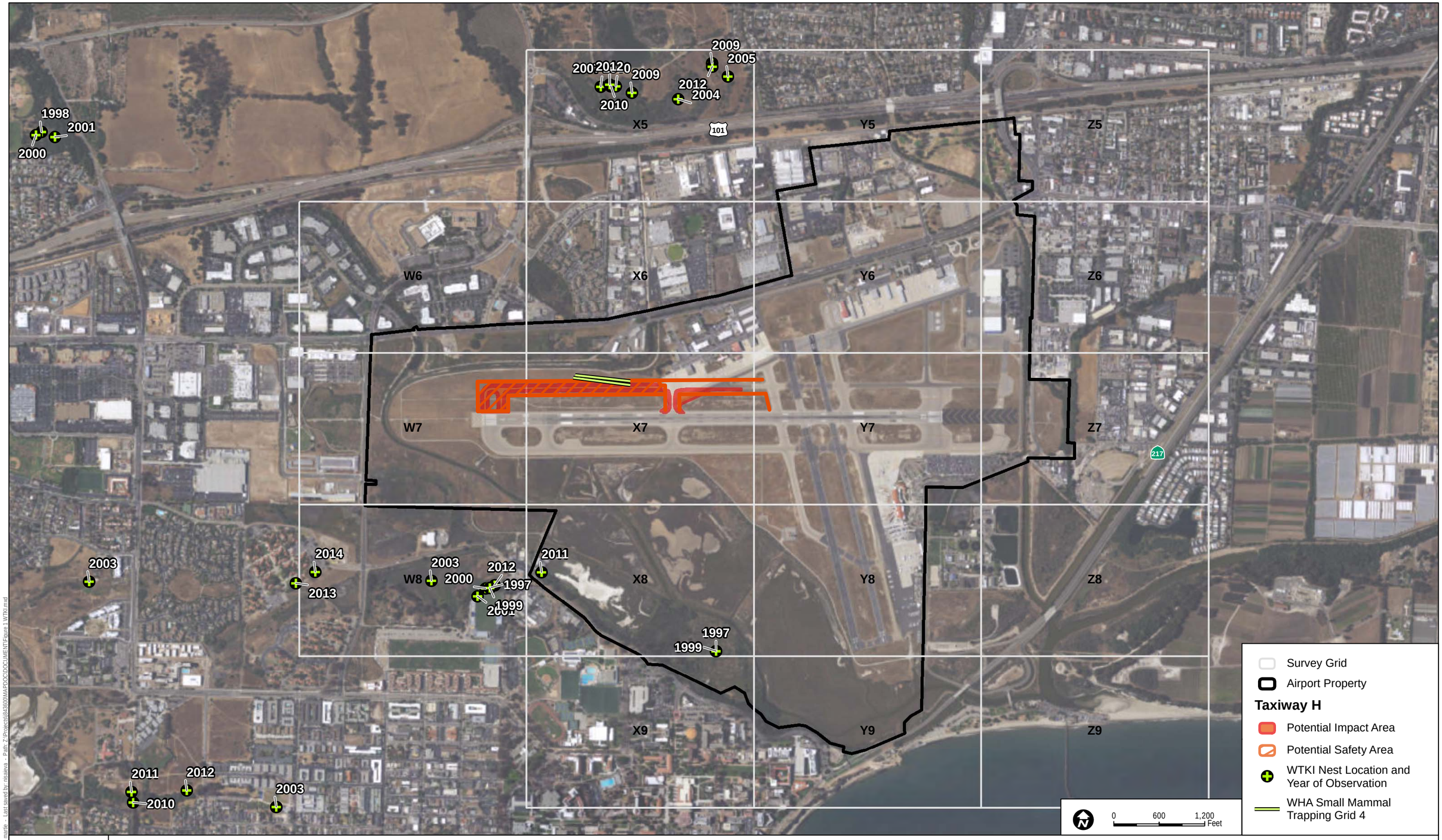
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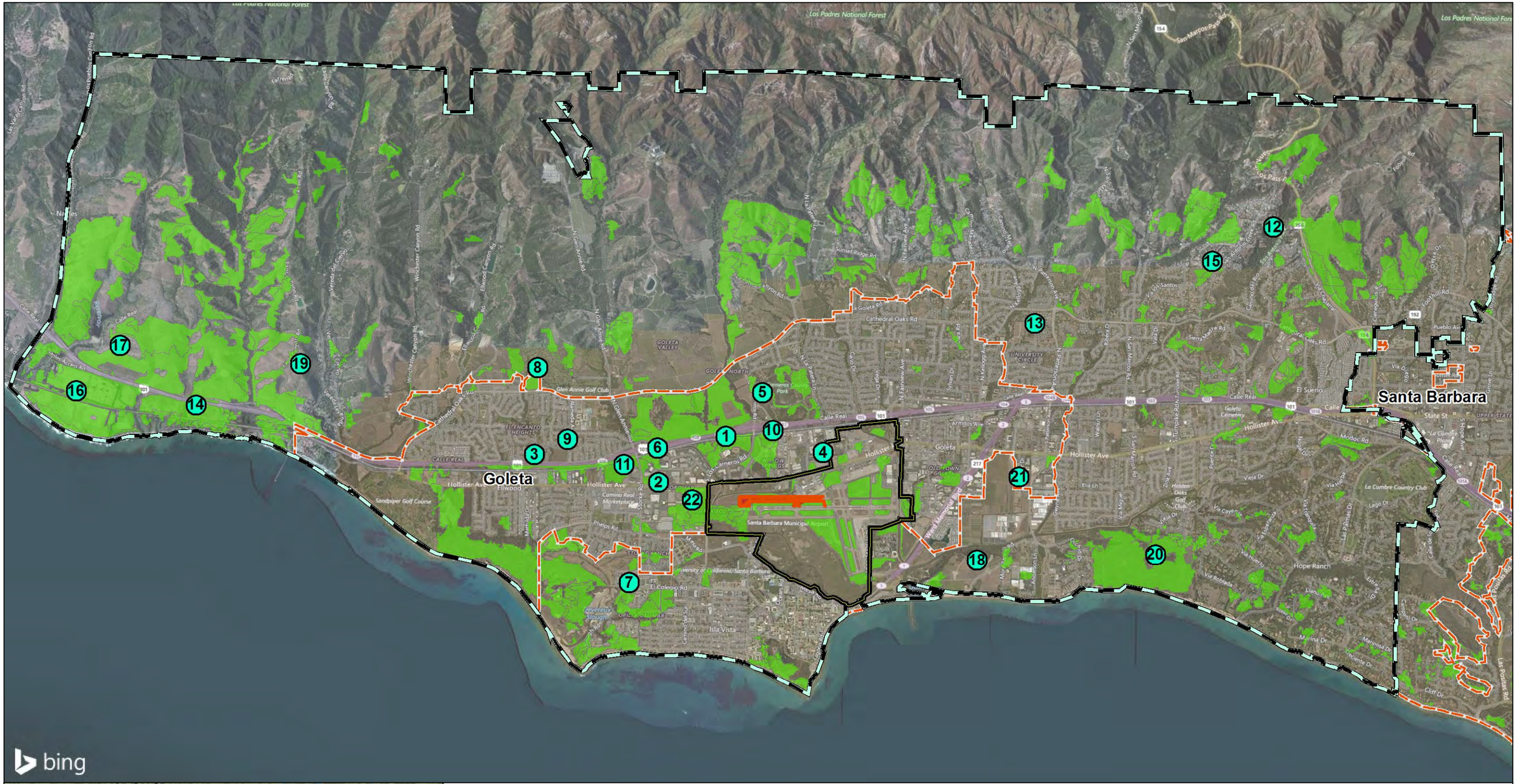
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FIGURE 1

White-tailed Kite Occurrences

Santa Barbara Airport Master Plan - Response to CDFW White-tailed Kite Comment

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SOURCE: Bing (Accessed in 2017), USGS (2017)

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FIGURE 2

Cumulative Study Area

Santa Barbara Airport Master Plan - Response to CDFW White-tailed Kite Comment

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Appendix D

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TECHNICAL MEMORANDUM

To:	Andrew Bermond, City of Santa Barbara Airport Department Judi Krauss, Coffman Associates
From:	John H. Davis IV, Dudek
Subject:	Santa Barbara Airport Master Plan Program Environmental Impact Report Proposed Mitigation Measures for Development of a Programmatic Mitigation Plan
Date:	June 5, 2017
Attachments:	Exhibit 2A – Draft Proposed Taxiway H Extension (Coffman Associates) Figure 1 – Potential On-Site Mitigation Areas (Dudek)

This technical memorandum presents a framework for a Programmatic Mitigation Plan to mitigate potential wetland and/or wetland and riparian buffer impacts associated with the proposed Airfield development identified in the Santa Barbara Airport (Airport) Master Plan Program Environmental Impact Report (Master Plan Program EIR). The proposed impacts in wetland and upland areas are associated with the recommended Taxiway H improvements to Runway 7-25, which involve the extension of Taxiway H to the Runway 7 threshold. This action would provide a full-length parallel taxiway and the construction of two new taxiway connectors. The area of disturbance would be the Taxiway H pavement as well as its shoulders and grading within its Taxiway Object Free Area. It also includes an area of disturbance for relocation of the glideslope antenna. Based on a Taxiway H exhibit prepared by Coffman Associates (*see attachments*), an approximate 12.4-acre area (not including the paved areas to be removed) would be disturbed with approximately five acres of net increase in impervious surfaces.

The majority of the other proposed Master Plan Program EIR improvements would be located in developed areas of the Airport, and airfield safety improvements (taxiway extension/improvements) would be located in level areas, thereby limiting grading, substantial increases of new impervious surfaces, and disturbance to natural drainage features. New or improved drainage systems necessary to convey runoff from improvement areas, including any drainage discharge or disposal devices would be designed to avoid or minimize impacts to the site's waterways/drainages.

Implementation of the proposed airfield development associated with Taxiway H would result in permanent impacts to potential jurisdictional wetland habitat and wetland and riparian setback/buffers within the Goleta Slough. Impacts to jurisdictional wetlands and/or wetland

buffers requires compensatory mitigation, and in this case, preferably on-site restoration of previously disturbed habitat to fulfill compensatory mitigation requirements. In addition, the design of compensatory mitigation must be consistent with the Airport's on-going wildlife maintenance activities and those required by the Wildlife Hazard Management Plan (WHMP; Airport 2017). The availability of potential mitigation land within the Goleta Slough and the existing connectivity between the potential mitigation land and intact wetland habitat within the Goleta Slough provide a rationale for the selecting such areas. Potential Mitigation Areas 1-7 described in **BIO-1** are all located within the Goleta Slough and may be used as compensatory mitigation sites, pending agency approvals. The Airport has a record of previous wetland restoration projects on Airport property and within the Goleta Slough which provides evidence of the likelihood of successful restoration project implementation and establishment of self-sustaining native habitat in the long-term.

Preparation of a Programmatic Mitigation Plan would set the framework for mitigating wetland and/or wetland buffer impacts related to state and federal jurisdictional wetlands and wetland buffers and riparian habitat to a less than significant level under the Master Plan Program EIR. Project-specific Habitat Mitigation and Monitoring Plan(s) (HMMP) as part of future project approvals would be required under the Programmatic Mitigation Plan to provide detailed determinations of mitigation design and implementation criteria following coordination with the appropriate federal, state, and local agencies.

BIO-1 **Programmatic Mitigation Plan**. The Programmatic Mitigation Plan is intended to provide a framework for future project-specific Habitat Mitigation and Monitoring Plan(s) (HMMP) to provide compensatory mitigation for indirect and direct impacts to jurisdictional wetland habitat and established wetland and riparian setback/buffers from these protected habitats under the Airport Master Plan Program EIR. The HMMP shall also address impacts to upland (i.e., grassland and shrubland) habitats. The Programmatic Mitigation Plan should be consistent with all Santa Barbara Airport (Airport) operation and management policies, including ongoing wildlife management activities and requirements of the Wildlife Hazard Management Plan (Airport 2017). In addition, it shall also consider the California Coastal Act and Airport Local Coastal Plan, Goleta Slough Area Sea Level Rise and Management Plan (Goleta Slough Management Plan; GSMC 2015), California Fish and Game Code, Clean Water Act, and other plans and polices that regulate wetland and upland habitats. Under direction of the Programmatic Mitigation Plan, the Taxiway H Airfield Safety Project will be required to submit for regulatory agency (USACE, CDFW, CCC, and City, as appropriate) approval a HMMP for impacts to

jurisdictional wetland and upland areas. Components of the Programmatic Mitigation Plan shall include, at minimum, the following requirements and information:

1. Mitigation for wetland habitat and and/or wetland and/or riparian buffers shall be a minimum of 4:1 (restoration to impact) ratio and upland habitat (i.e., grassland and shrubland) shall be replaced at a 3:1 ratio in a form and location acceptable to the permitting regulatory agencies. Regulatory agencies may require a higher ratio depending on the habitat value and function that is proposed to be impacted.

2. Habitat mitigation should occur on Airport property (on-site) in lands historically part of the Goleta Slough wetland complex and on wetland and upland areas currently mapped as disturbed or dominated by areas of non-native invasive plant species which would be reasonably expected to establish sustainable wetland, transitional, and upland habitat(s) to the extent feasible.

3. Any mitigation within the Goleta Slough Ecological Reserve shall be authorized by the California Department of Fish and Wildlife and California Coastal Commission under a Local Coastal Plan amendment.

4. The Airport shall solicit comments from the Goleta Slough Management Committee, a technical advisory committee for the Goleta Slough Ecological Reserve, on the Programmatic Mitigation Plan as well as on all future project-specific HMMP(s).

5. Focused biological surveys shall be conducted on the potential mitigation area(s) within one year of approval of all future project-specific HMMP(s). Depending on the amount of impacts to wetland and upland habitats, more than one mitigation area may require biological surveys. At minimum, the biological surveys shall consist of vegetation community mapping, floristic inventory, a wetland delineation and jurisdictional determination, and focused Belding's savannah sparrow surveys and raptor surveys, if suitable habitat exists for these species in the selected mitigation area(s). Additionally, each mitigation area shall be analyzed for physical habitat conditions including hydrology, salinity, and soils by the appropriate technical specialists.

6. All sensitive biological resources shall be avoided in the design and during implementation and maintenance of future mitigation. Sensitive biological resources include, but are not limited to occurrences of nesting Belding's savannah sparrow, southern tarplant, coulter's goldfield, meadow barley, creeping

ryegrass, and other native grassland and native wetland habitat (Special-Status Species and Wetland Inventories, Dudek 2012 a and b).

7. The Airport should comply with the conditions and recommendations of existing guiding documents: Local Coastal Plan amendments, Goleta Slough Management Plan (GSMC 2015), and Wildlife Hazard Management Plan (Airport 2017).

8. The Airport shall assess the potential for an increase in wildlife hazards to airfield operations as described in Wildlife Hazard Assessment (WHA; Dudek 2016) and the Wildlife Hazard Management Plan (WHMP; Airport 2017) in all future project-specific HMMP's with respect to the following criteria:

    a. Increasing the attractiveness of the Airport to hazard species or groups identified in the WHA/WHMP, as well as other species that may provide a hazard to aircraft. These include, but are not limited to, raptors, turkey vultures, gulls, waterfowl, pigeons and doves, flocks of blackbirds and European starlings, and coyotes.

    b. Increasing the attractiveness of the Airport to any species covered under a valid Airport's depredation permit.

    c. Providing attractants to wildlife within 250 feet of a runway centerline.

    d. Attracting threatened or endangered species, California fully protected species, or any species for which the Airport's ability to conduct wildlife hazard management activities (such as visual and acoustic hazing) may be limited.

    e. Resulting in an increase in rodent populations on the Airport.

    f. Resulting in any inundation of the airfield.

    g. Resulting in an increase in trees or shrubs in the airfield vicinity.

9. Restoration strategies shall be proposed that balance the criteria identified in **BIO-1.1** through **BIO-1.8,** as well as agency requirements for wetland and upland restoration. The Mitigation Areas 1 through 7 and potential restoration strategies have been considered in preparation of the Programmatic Mitigation Plan and shall continually be considered in project-specific HMMP(s). A summary of the

mitigation areas, acreage available for mitigation, existing habitats, and potential restored and/or enhanced habitats are presented in *Table 1* below.

Table 1. Summary of Potential Mitigation Areas and Existing and Restored Vegetation Communities

Mitigation Area	Mitigation Acreage Available	Existing Habitats[1, 2, 3]	Potential Restored or Enhanced Habitats
1	7.99	• Emergent Wetland • Herbaceous Wetland • Grassland Wetland • Annual Grassland • Shrubland • Invasive (Non-native)	• Emergent Wetland • Transitional Wetland • Grassland Wetland • Native Grassland
2	3.48	• Annual Grassland	• Transitional Wetlands • Native Grassland
3	2.12	• Emergent Wetland • Grassland Wetland • Annual Grassland	• Emergent Wetland • Transitional Wetland • Grassland Wetland • Native Grassland
4	0.94	• Emergent Wetland • Salt and Mudflats • Native Shrubland • Non-native Invasive	• Transitional Wetland • Native Shrubland
5	4.58	• Emergent Wetland • Salt and Mudflats • Native Shrubland • Non-native Invasive	• Emergent Weltand • Transitional Wetland • Grassland Wetland • Native Shrubland
6	8.15	• Emergent Wetland • Native Perennial Grassland • Non-Native Annual Grassland	• Emergent Wetland • Grassland Wetland • Transitional Wetland • Native Grassland
7	11.26	• Emergent Wetland • Native Perennial Grassland • Non-Native Annual Grassland	• Emergent Wetland • Grassland Wetland • Transitional Wetland • Native Grassland
Total Acreage	38.52		

[1] Dudek 2012. Wetland Inventory for the Santa Barbara Master Plan Update
[2] Dudek 2012. Wetland Inventory for the Santa Barbara Master Plan Update
[3] California Coastal Act one-criterion definition of wetland

Mitigation Area 1

Mitigation Area 1 (7.99 acres) is located between Hollister Avenue and the Growing Solution Nursery at Santa Barbara Airport (*see attachments*) within the California Department of Fish and Game's (now Fish and Wildlife) Management Plan Area (Goleta Slough Management Committee (GSMC) 1997). The nearest designated subarea basins per the Goleta Slough Management Plan are semi-tidal basins E/F located 0.30 mile south of Mitigation Area 1 just across from the runways (GSMC 2015). An Airport fence around the nursery and upland areas partially forms the southern boundary of the mitigation area with Robert Troup Road continuing further east of the nursery along the southeast boundary. Hollister Avenue is directly adjacent to northern boundary of the Mitigation Area. Across Hollister Avenue, a wetland area and remnant part of Goleta Slough, the Los Carneros Wetland, is situated between nearby residences and businesses. A storm culvert connects the wetland to Mitigation Area 1. Further south is Los Carneros Creek, which is separated from the mitigation area by an Airport access road positioned on a levee above the creek channel. The southern tarplant (*Centromadia parryi*) is located in southern portion of this mitigation area and further south along Los Carneros Creek. Southern tarplant will be avoided.

Mitigation Area 1 is currently a maintained field comprised of seasonally mowed annual brome grassland. The annual grassland is located primarily on slightly elevated topography, which surrounds existing wetland habitat. In fact, this area is known to flood during heavy storm events. Historically, Mitigation Area 1 was believed to consist of palustrine and estuarine habitats as part of the Goleta Slough (GSMC 1997). Based on current conditions (vegetation and flooding) and historical wetland habitats, this site is ideal for the expansion of transitional and wetland habitats. To accomplish the conversion from upland annual grassland to wetland habitat, the site would be need to be mildly re-contoured or "groomed," as appropriate, to allow for a variety of short wetland vegetation (grasses, sedges, alkali heath, pickleweed, etc.) to flourish in a seasonally waterlogged soil matrix similar to the area west of Mitigation Area 1 (saltgrass, curly dock, pickleweed, meadow barley, etc.). The re-contouring could also remove a portion of the non-native and invasive plants species seed stock currently occupying the upland areas. The desired plant composition of the wetlands installed in this location, if selected, shall be consistent the Goleta Slough Management Plan (GSMC 2015) and compliant with Airport safety regulations. Mitigation Area 1 is suitable for various wetland types or strategies to re-introduce wetland habitat back to this

area. To balance restoration goals with safety issues, two restoration strategies are considered along with a brief assessment of potential wildlife hazards that may be attracted to the area once constructed. Dudek et al., (2016) recently completed a Wildlife Hazard Assessment for the Airport (Dudek 2016) and the SBA certified their Wildlife Hazard Management Plan in February 2017 (Airport 2017).

Restoration Strategy 1: Transitional Wetland (mesic grasslands – saltgrass, meadow barley, FAC species)

Grass dominated wetlands are not expected to greatly increase the wildlife hazard levels for aircraft utilizing the proposed Taxiway H or existing runways. The water-dependent bird species, a higher level of concern, that are attracted to ponded areas would generally not be drawn to wetlands dominated by perennial grass species (although small numbers may establish nests in grasslands). An exception might be Canada goose (*Anser Canadensis*), a large species of waterfowl that often travels in flocks and gathers and forages in grassy areas during the day time. However, all areas proposed already provide open grassy areas that could potentially attract this species, so this type of wetland restoration may not increase the attraction of the Canada goose to the Airport or near active taxiways or runways.

Additionally, if unmanaged, it is possible that grassland wetland habitat would contribute to an increase in small mammal populations, which could attract coyotes (*Canis latrans*) and even raptors. Attraction of coyotes in Wetland Mitigation Area 1 from other nearby habitat patches via the airfield could present an increased wildlife hazard. Potential attraction of raptors could also create an increased wildlife hazard if prey species became common in the restored grassland wetland habitat. Raptors often move about freely between suitable hunting fields depending on prey abundance and availability. In general, an increase in raptor activity would pose more of a hazard to air traffic compared to coyotes, regardless of proximity to the airfield. If future HMMP's are consistent with the Wildlife Hazard Management Plan (Airport 2017), the opportunities for coyotes and raptors species to successfully capture prey would be minimal; therefore, use by these species would likely be infrequent in the restored habitat unless management alternatives are employed for parts of the restored habitat that benefit the coyote, raptors, and their prey.

Although the use of saltgrass or meadow barley as key component(s) of wetland restoration in Mitigation Area 1 has potential to attract wildlife species hazardous

to aircraft, overall this type of wetland has a relatively low wildlife hazard associated with it in comparison to other wetland habitats in the area that support extensive ponding, perennial surface water, or tidal circulation.

Restoration Strategy 2: Herbaceous or Emergent Wetland

Emergent vegetation, depending on species, typically requires longer duration ponding, inundation, and/or water-logged soils. To re-introduce hydrology into Mitigation Area 1 increases the possibility of sustaining standing water for an extended period of time, which may attract several dabbling duck species. In coastal Santa Barbara County, this includes mallard (*Anas platyrhynchos*), a species that sometimes moves between wet areas with relative frequency and during the breeding season engages in long chases involving several birds, and species such as northern shoveler (*Anas clypeata*), which do not breed in the vicinity, but are highly prone to flushing because of human activity. Attraction of great blue heron (*Ardea herodias*) and great egret (*Ardea alba*), species large enough that one individual could pose a threat to an aircraft, could also result in an increased wildlife hazard. Along with Canada goose, these species are some of the greatest threats to aircraft at the Airport.

If Mitigation Area 1 is re-contoured or "groomed" to accept a greater quantity and duration of standing water to support herbaceous or emergent wetland, the potential of attracting dabbling ducks, herons, and egrets would significantly increase during wet periods. Attraction of these species during winter and early spring could equate to an increase in the wildlife hazard level. However, this increase would be low compared to that associated with areas closer to the airfield (Mitigation Area 4 and 5) and is the preferred restoration strategy if this type of wetland creation is required (i.e., 3-criteria emergent wetlands).

<u>Mitigation Area 2</u>

Mitigation Area 2 (3.48 acres) is located along the western portion of the Airport between Tecolotito Creek and Los Carneros Road (*see attachments*) within Subarea R of the California Department of Fish and Wildlife Management Plan Area (GSMC 1997). A slightly elevated shrub covered area forms the southern boundary. This "mound" is oval shaped and approximately half of it (as viewed from above) is positioned on Airport property. The other half is part of the Ecological Preserve on CDFW property also known as Western Goleta Slough.

The nearest Goleta Slough Management Plan Subarea Basin is 0.18 mile southeast of non-tidal basin R-2 (GSMC 1997).

Mitigation Area 2 currently contains a field of non-native annual grasslands comprised primarily of Italian rye grass and annual brome grass. Native vegetation abuts the southern extent of the area including pickleweed and alkali heath, both plant species considered hydrophytic (USACE 2014). The rare Coulter's goldfield (*Lasthenia glabrata* ssp. *coulteri*) is located in southwestern portion of this mitigation area and will be avoided. Historically, Mitigation Area 2 was believed to provide upland habitat within the Goleta Slough with a small area of palustrine located in the southwestern area (GSMC 1997). A greater coverage of palustrine habitat was located north of the area, historically, but is now dominated by invasive grasses and forbs (Harding grass and black mustard) and native shrub, coyote brush, on the elevated area near Los Carneros Road. Mitigation Area 2 is separated from Tecolotito Creek by an Airport road that follows the creek south and then as it bends west towards Los Carneros Road at the end of runway. Based on current conditions (vegetation) and historical wetland habitats, Mitigation Area 2 is ideal for creation of wetlands (the area north of the Airport road – not delineated – also could be considered for restoration). As with Mitigation Area 1, the site would be need to be re-contoured (or "groomed") and planted with a variety of short wetland vegetation. The desired plant composition of the wetlands installed in this location, if selected, shall be consistent the Goleta Slough Management Plan and compliant with Airport safety regulations. Similar to Mitigation Area 1, Mitigation 2 is suitable for various wetland types and two wetland types are considered as in Mitigation Area 1 with consideration of the same restoration goals and safety concerns.

If restoration strategy 1 is implemented at Mitigation Area 2, the restoration goal may only be achieved if 1- or 2-criteria wetland habitat is desired or a transitional wetland to upland habitat. The wildlife hazard assessment is expected to be similar to Mitigation Area 1; however, the hazard level would be potentially greater, and as raptors foraging in this area could enter airspace directly in the path of aircraft. Although this area, unlike Mitigation Area 1, is inside the Airport fence, it is separated from the airfield by Tecolotito Creek, which could limit travel of coyotes to and from the site and taxiways and runways where they pose safety concerns.

Implementation of restoration strategy 2 at Mitigation Area 2, in which ponding would occur seasonally and possibly over an extended period of time depending

on final design, would potentially result in an increase in a hazard level higher than what would be associated with this type of mitigation at several other sites (Mitigation Areas 1 and 3).

Mitigation Area 3

Mitigation Area 3 (2.12 acres) is located in the southwest portion of the Airport property along its southern boundary which it shares with the Ecological Reserve on CDFW property (*see attachments*). Mitigation Area 3 is also within the Subarea R of the CDFW Management Plan Area (GSMC 1997) and is approximately 0.25 mile southeast of Mitigation Area 2. Mitigation Area 3 is also within Study Area Basin R-2 designated as "Non-Tidal Basins that Impound Water." The slightly elevated shrub covered area is about 150 feet from the western boundary of the area separated by an Airport road that is no longer in use (historically part of the military installation). A channelized Tecolotito forms the northern boundary of the area. Mitigation Area 3 is over 400 feet from a taxiway safety area and even further from a runway and its safety area.

Mitigation Area 3 currently contains a field of non-native annual grasslands dominated by Italian rye grasses. Small patches of natural vegetation are found within the area including pickleweed, meadow barley, and alkali heath, all hydrophytic plants (USACE 2014). Historically, Mitigation Area 3 was believed to be palustrine-upland hybrid within the Goleta Slough (GSMC 1997).

Based on current conditions (vegetation) and historical wetland habitats, Mitigation Area 3 is ideal for creation of wetlands (the area north of the Airport road – not delineated – also should be considered for restoration). As with Mitigation Area 1, the site would be need to be re-contoured (or "groomed") and planted with a variety of short wetland vegetation. The desired plant composition of the wetlands installed in this location, if selected, shall be consistent the Goleta Slough Management Plan and compliant with Airport safety regulations. Mitigation Area 3 is suitable ecologically for the two restoration strategies.

If restoration strategy 1 is implemented at Mitigation Area 3, the restoration goal may only be achieved if 1- or 2-criteria wetland habitat is desired. The wildlife hazard assessment is expected to be similar to Mitigation Area 1 and lower than Mitigation Area 2, as raptors foraging in this area would not be in the direct path of aircraft. The Airport fence and location of Tecolotito Creek also limits the attractiveness of the coyotes and the possibility of them moving across runways.

Implementation of restoration strategy 2 at Mitigation Area 3, in which ponding would occur seasonally and possibly over an extended period of time depending on final design, would potentially result in an increase in a hazard level higher than what would be associated with this type of mitigation at the other mitigation areas, specifically Mitigation Areas 1 and 2.

Mitigation Areas 4 and 5

Mitigation Areas 4 (0.94 acres) and 5 (4.58 acres) are located south of the runway in the south-central portion of the Airport property close to U.C. Santa Barbara (*Figure 1*). Mitigation Area 4 is within Basin L and Mitigation Area 5 is within Basin M per the CDFG's Management Plan or Study Area Basin (GSMC 1997). Mitigation Areas 4 and 5 currently contain pickleweed with salt and mud flats in the lower areas and shrubs and non-native invasive herbaceous vegetation along the berms. Historically, Mitigation Areas 4 and 5 were believed to be estuarine habitat of the Goleta Slough (GSMC 1997).

Based on current conditions (vegetation) and historical wetland habitats, Mitigation Areas 4 and 5 are ideal for creation or enhancement of additional wetland and upland habitats. The desired plant composition of the wetlands installed in this location, if selected, shall be consistent the Goleta Slough Management Plan and compliant with Airport safety regulations.

Implementation of restoration strategy 2 at Mitigation Areas 4 and 5, in which ponding would occur seasonally and possibly over an extended period of time depending on final design, could result in a significant increase in hazard level beyond Mitigation Areas 1, 2, or 3.

Mitigation Areas 6 and 7

Mitigation Areas 6 (8.15 acres) and 7 (11.26 acres) are located directly south of taxiway safety area in the central to south-central portion of the Airport property south of Hollister Avenue. The taxiway and runway safety area are adjacent to Mitigation Area 7 to the east. An Airport road connecting a weather station separate Mitigation Area 6 (to the west) from 7 (to the east) (*Figure 1*). Neither mitigation areas are within a Subarea of the CDFW Management Plan or Study Area Basin per the Goleta Slough Management Plan (GSMC 1997; City of Santa Barbara Local Coastal Plan 1984). Mitigation Area 7 currently contains a field of primarily non-native annual brome grasses with large patches of meadow barley

and small patches of pickle weed and salt grass, all hydrophytic plants (USACE 2014). Historically, Mitigation Areas 6 and 7 were believed to be estuarine habitat of the Goleta Slough (GSMC 1997).

Based on current conditions (vegetation) and historical wetland habitats, Mitigation Area 6 and 7 are ideal for creation of upland (i.e., grassland), transitional, and wetland habitats. As with other mitigation areas, the sites would be need to be re-contoured or "groomed" and planted with a the appropriate plant palette. The desired plant composition of the upland, transitional, wetland, or combination of habitat(s) installed in this location, if selected, shall be consistent the Goleta Slough Management Plan and compliant with Airport safety regulations.

If restoration strategy 1 is implemented at Mitigation Area 6 or 7 the restoration goal may only be achieved if 1- or 2-criteria wetland habitat is desired. The wildlife hazard assessment is greatest for these two areas since no barriers separating coyotes from the airfield, and birds and wildlife attracted to these locations would be adjacent to the airfield. These are probably the least desirable locations for this type of restoration, although the level of hazard associated with this type of restoration, in general, is considered low.

Implementation of restoration strategy 2 at Mitigation Areas 6 and 7, in which ponding would occur seasonally and possibly over an extended period of time depending on final design, could result in a significant increase in hazard level beyond the other Mitigation Areas.

10. As necessary due to sea level rise or other changes in future conditions within the Slough, adaptive restoration measures consistent with the recommendations of the Goleta Slough Management Plan shall be implemented.

11. The genetic origin of all native wetland and riparian propagules shall be from the Goleta Slough and for all native upland plants should be from the Goleta Valley. All wetland plants shall have a facultative, facultative wetland, or obligate wetland indictor status per the U.S. Army Corps of Engineers National List of Plant Species that Occur in Wetlands.

12. Restoration shall be phased to ensure that all restoration plantings are in place with sufficient irrigation prior to final inspection. Irrigation shall be reduced or eliminated after Year 2 depending on environmental conditions (i.e., drought may

prolong irrigation). The wetland restoration shall be without supplemental irrigation for at least two years prior to final approvals. This could result in a maintenance and monitoring period greater than five (5) years.

13. Prior to commencement of development activities, the Airport shall file a performance bond with the City to complete restoration and maintain plantings for a five (5) year period.

14. The extent of development shall be restricted to those areas displayed on site grading plans to avoid additional impacts to wetland habitat and wetland and/or riparian buffers. Development boundaries shall be delineated (i.e., using wooden stake with highly visible environmentally-friendly paint) in the field prior to any ground-breaking activities.

15. Performance Criteria. Mitigation success for future project-specific HMMP(s) shall be determined, at minimum, by the following performance criteria:

    - All installed plants must achieve a 70 percent survival rate by the end of the first year, and an 80 percent survival rate of the remaining plants by the end of the fifth year.

    - Non-native invasive weeds must remain below 15 percent of the total vegetative cover at all times. Naturalized, non-invasive non-native grasses are not included in this performance criterion.

    - Native cover must be 75 percent after three years and 90 percent cover after five years.

    - All container plants and seeded areas must survive without supplemental irrigation for a minimum of two years.

    - No single species shall constitute more than 50 percent of the vegetative cover.

    - No woody invasive species shall be present and herbaceous invasive species, excluding naturalized, non-invasive grasses, shall not exceed five percent cover after five years.

    - Replacement plants shall be monitored for a minimum of three years to ensure successful establishment.

REFERENCES

Airport (Santa Barbara Airport). 2017. Wildlife Hazard Management Plan. February 21, 2017.

City of Santa Barbara. 1981. Local Coastal Plan. Amended July 1994 and November 2004.

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Dudek 2012a. Special-Status Species Inventory for the Santa Barbara Airport Master Plan Update

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GSMC (Goleta Slough Management Committee). 1997. Goleta Slough Ecological Management Plan

GSMC. 2015. Goleta Slough Area Sea Level Rise and Management Plan

USACE (U.S. Army Corps of Engineers). 2014. Arid West 2014 Regional Wetland Plant List. 2014 Update of Wetland Ratings. Phytoneuron 2014-41:1-42.

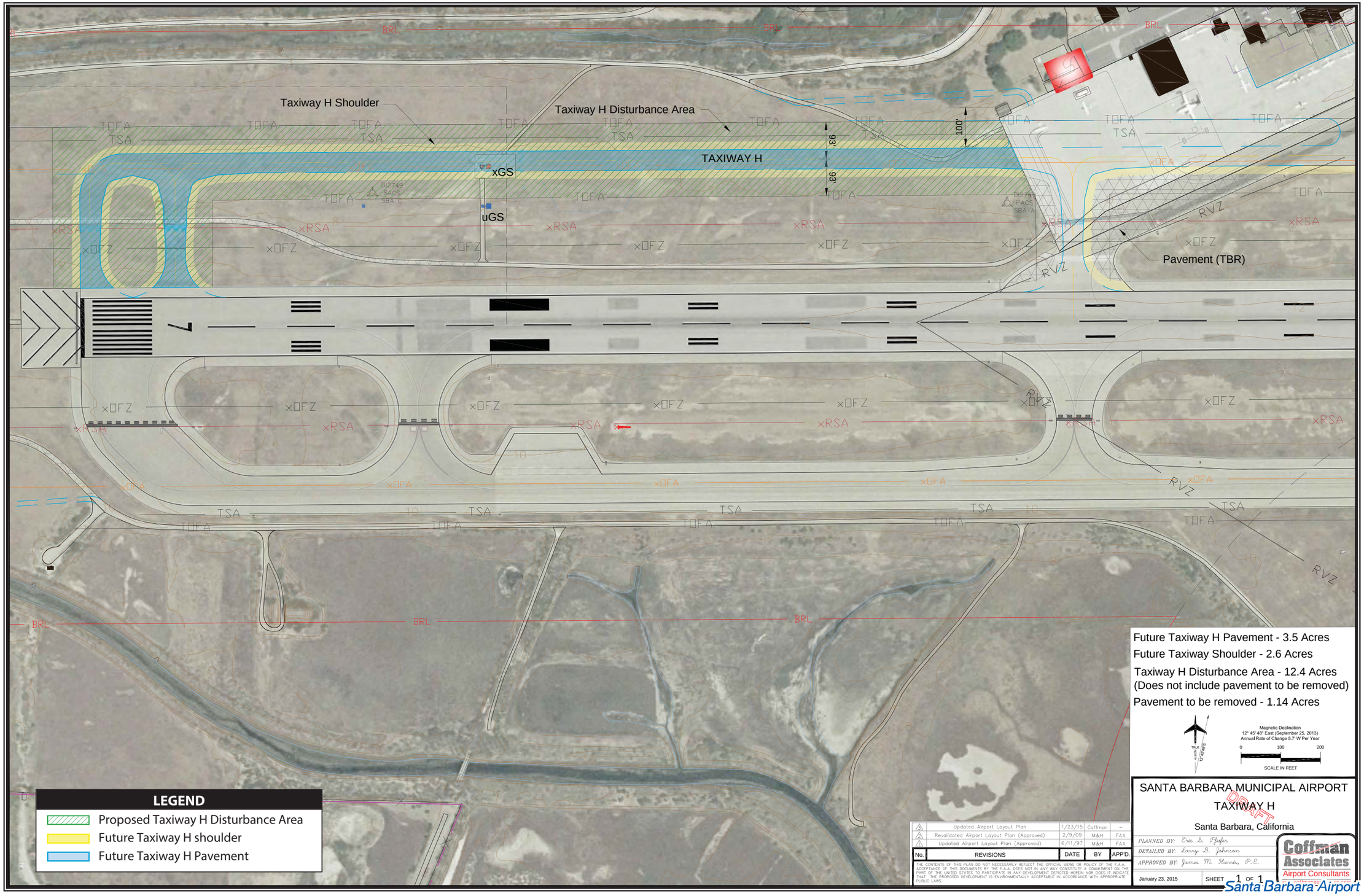
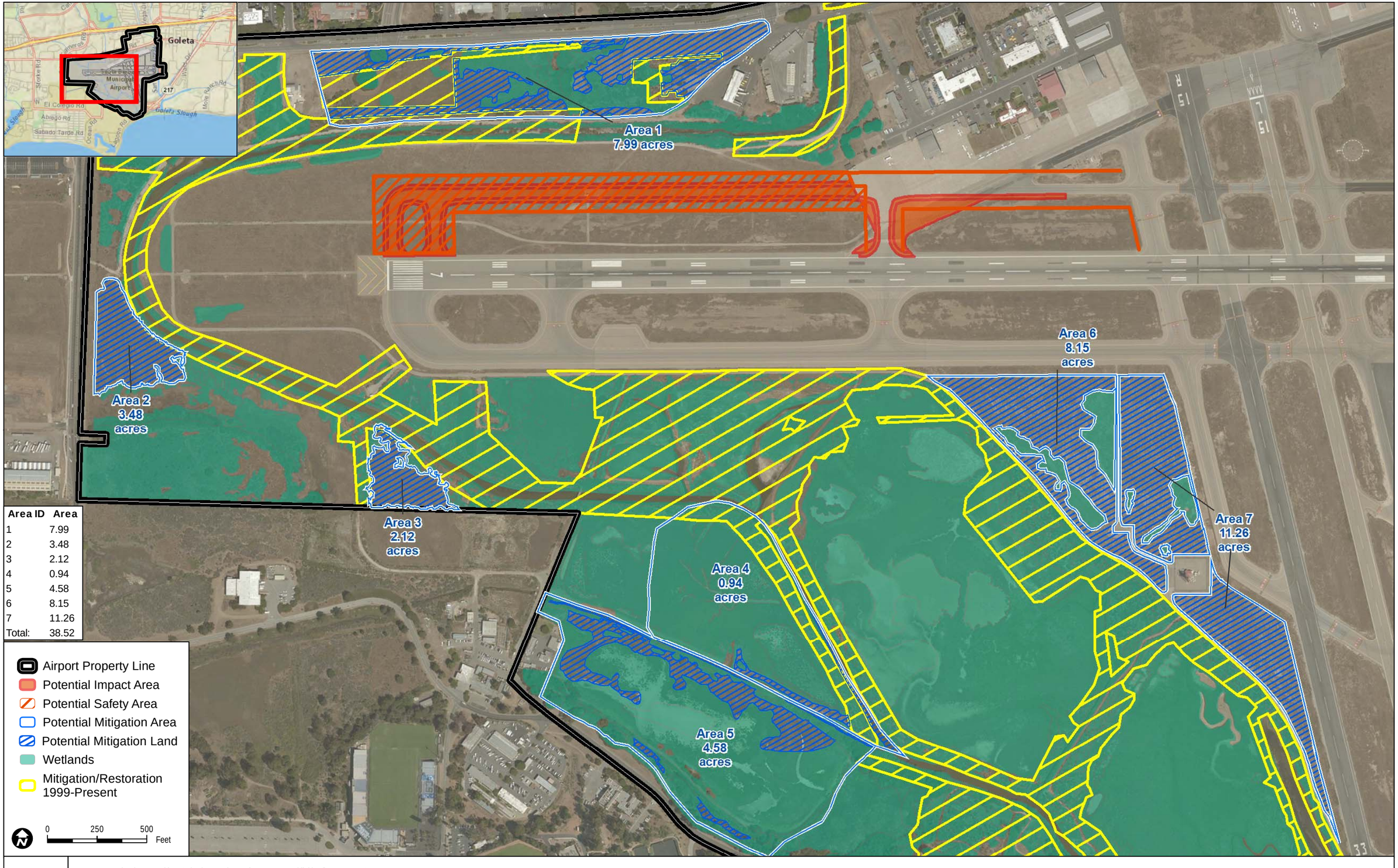


Exhibit 2D
PROPOSED TAXIWAY H EXTENSION

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SOURCE: Bing (Accessed in 2017), The Land Trust for SBCo 2011 (digitized), DUDEK 2012

DUDEK

FIGURE 1

Potential On-site Mitigation Areas

Santa Barbara Airport Master Plan

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