

Mayor Paula Perotte and

Rezone

Sarah Mayer Public Comment - City of Goleta Councilmembers

From: Anne Wells <awells@cityofgoleta.org>
Sent: Thursday, April 18, 2024 4:41 PM
To: PAD LRP Housing Element; sbcob
Cc: Robert Nisbet; County Executive Office; City Council
Subject: Goleta Mayor and City Council Housing Element Rezones Comment Letter to BOS
Attachments: 2024 4-16 COG Letter to County BOS RE HE Rezones - signed with enclosure.pdf

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Good Afternoon:

Please find attached, a comment letter from the Mayor and Councilmembers to the Board of Supervisors regarding the upcoming hearing for the County Housing Element Rezones and Policy Amendments.

Thank you,

Anne

Anne Wells
Advance Planning Manager
City of Goleta
805-961-7557
awells@cityofgoleta.org





April 16, 2024

SENT VIA EMAIL
housingelement@countyofsb.org
sbcob@countyofsb.org

CITY COUNCIL

Paula Perotte
Mayor

Luz Reyes-Martín
*Mayor Pro Tempore
District 1*

Stuart Kasdin
Councilmember

James Kyriaco
*Councilmember
District 2*

Kyle Richards
Councilmember

CITY MANAGER
Robert Nisbet

Board of Supervisors
County of Santa Barbara
105 East Anapamu Street
Santa Barbara, CA 93101

RE: County Housing Element Rezone Amendments Comments

Dear Chair Lavagnino and Honorable Members of the Board of Supervisors:

As you consider the Housing Element Rezone Amendments, policy amendments, and the related Final Program EIR (FPEIR) at an upcoming hearing, significant housing is proposed in the South Coast that will create many challenges for the Goleta community. In our Draft Program EIR (DPEIR) comment letter dated February 9, 2024 (attached), we identified several solutions to address infrastructure needs, most or all of which were disregarded in the FPEIR. We believe our requested solutions detailed in the letter merit your reconsideration. Regional collaboration to address shared infrastructure needs has long been our practice and we wish to continue with this approach to the benefit of us all.

Not only were none of our requested mitigations added to the FPEIR, but we learned with the release of the Planning Commission staff report for the March 27, 2024 hearing that County staff also proposed to create an exception for Housing Element sites to a critical County Circulation Element policy that serves to address transportation impacts within the City. For projects located within the unincorporated County, County Circulation Element Policy IV.D.5 commits the County to apply stringent level of service (LOS) standards to all affected roadway intersections, not just those within the unincorporated County but also to intersections within adjacent incorporated cities.

The Planning Commission supported County staff's recommendation to exempt the Housing Element rezone sites from objective LOS

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standards under this policy and instead defer to County Public Works Department staff's judgment as to what constitutes "acceptable" intersection improvements. What is most troubling is that the March 27, 2024, staff report notes that County staff "anticipate that some housing projects enabled by the rezones would result in some roadways and/or intersections operating below current LOS standards" and that "improvements necessary to fully offset a project's impacts to a roadway or intersection may be infeasible." Yet the staff report fails to indicate where County staff expect these impacts to occur. At this point, we are left to assume that the impacted intersections are within the City of Goleta and the amendment to the Circulation Element policy is intended to avoid the need to address and adequately mitigate those impacts.

As noted, when the County released the FPEIR for the County 2023-2031 Housing Element on March 19, 2024, the City was disappointed to see that very few of our substantive comments related to the project description, impacts, and mitigation measures provided in our February 9, 2024, letter were addressed. Without restating all our previous comments, which are incorporated, we do want to highlight a couple of important issues for your consideration.

In our DPEIR comments, we requested mitigation measures to address transportation infrastructure impacts of the new housing developments at Glen Annie and the South Patterson Agricultural Area, as these areas must rely on City roads for access. Without mitigation, vehicle, bicycle, and pedestrian traffic associated with County-proposed rezone sites lead to design safety concerns and hazards on Goleta's road network and intersections. Preventing dangerous intersections with mitigations such as restriping, signalization, improved bike lanes, and roundabouts will help us maintain level of service, safe modes of travel, and hazards reduction.

In summary, we ask that you direct staff to take the necessary time to update the FEIR to address comments provided in our Draft Program EIR comment letter, particularly those comments relating to mitigating infrastructure impacts in and around the City of Goleta. Please also do not allow exceptions to County Circulation Element LOS standards for Housing Element sites. The vast new residential capacity of the housing sites proposed to be rezoned will have outsized effects on traffic circulation and must be held to the same LOS standards now in effect.

We look forward to collaborating with you and your staff to address new housing enabled by the rezoning and ensuring that new development does not come at the cost of the operability of our shared roadway network.

Sincerely,



Mayor Paula Perotte

April 16, 2024



Mayor Pro Tempore Luz Reyes-Martín



Councilmember Stuart Kasdin



Councilmember James Kyriaco



Councilmember Kyle Richards

cc: Robert Nisbet, City Manager
Mona Miyasato, County Executive Officer

Enc.:
City of Goleta Draft Program EIR Comment Letter, Dated February 9, 2024

Letter Enclosure:

City of Goleta Draft Program EIR Comment Letter, Dated February 9, 2024



February 9, 2024

SENT VIA EMAIL
housingelement@countyofsb.org

CITY COUNCIL

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Mayor

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District 1

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Hannah Thomas, Project Planner
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123 E. Anapamu Street
Santa Barbara, CA 93101

RE: Santa Barbara County 2023-2031 Housing Element Update Draft
Program Environmental Impact Report Comments

Dear Ms. Thomas:

Thank you for the opportunity to review and comment on the County's 2023-2031 Housing Element Update Draft Program Environmental Impact Report (Draft PEIR), dated December 2023, State Clearinghouse No. 2022070490. The 2023-2031 Housing Element Update project (Project) includes many programs and actions to facilitate housing in the unincorporated areas of Santa Barbara County. We understand the challenge the County has faced in meeting state requirements related to the Project. However, it is critical to understand, analyze, and mitigate the impacts of the Project, thus ensuring that all impacts to the environment and surrounding community are fully addressed.

Most notably, the Project includes the rezoning of sites located adjacent to the City of Goleta (City), converting agricultural zoning to high density residential zoning. Of highest concern to the City is the rezoning of the following sites included in the Draft PEIR project description and the significant number of potential units associated with these sites:

- Sites 1 through 7 (South Patterson Agricultural Area) – 7,708 units
- Site 11 – Glen Annie Golf Course – 2,673 units

All of the above sites are only accessible through the City and any future residents on these sites will rely on the City's transportation network, open space and recreational spaces, emergency response facilities, and other resources.

Under the California Environmental Quality Act, a lead agency's duty to mitigate or avoid its project's significant impacts extends beyond the boundaries of the project area. (See *City of Marina v. Board of Trustees of Cal. State University* (2006) 39 Cal.4th 341, 359-360 [agency not excused from analysis or mitigation of impacts outside of its jurisdiction]; see also *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 369 [CEQA's purpose would be undermined if agencies could proceed "without an awareness of the effects a project will have on areas outside the boundaries of the project area."].) Based on our review of the Draft PEIR, we identified needed changes to better disclose, evaluate, and mitigate possible impacts relevant to the City. These changes are detailed in the attached comment matrix. Of note and as detailed in the comment matrix, the Draft PEIR omits critical discussion or analysis of Goleta General Plan policies or existing and planned infrastructure and capital projects within the City. Without consideration of City policies and projects, the analysis in the Draft PEIR is incomplete.

Also of note and detailed in the comment matrix is the need to add additional mitigation measures to address the impacts of the Project on our community. These include the need for a Traffic Mitigation Agreement between the City and County to address growth in the County lands southeast and north of the City. The comment matrix identifies the need for a broader agreement between the County and City to address payment of impact fees to Goleta, fair share payments for Goleta capital projects, the construction of Fire Station 10, and the construction of needed infrastructure as part of housing projects envisioned under the Project. The timing of these necessary mitigation measures is also critical to ensure adequate services are provided to the community. As such, these mitigation measures must include requirements that the impacts to the City be addressed prior to issuing any certificates of occupancy for new housing development envisioned with the project.

Addressing City comments will be critical to ensure that the Final PEIR provides adequate environmental analysis and mitigation for the Project. The City respectfully requests that the necessary changes as identified and described in this letter and in the attached comment matrix be included in the Final PEIR. If you have any questions regarding our comments, don't hesitate to contact me at pimhof@cityofgoleta.org or 805-961-7541.

Sincerely,



Peter Imhof
Planning and Environmental Review Department Director

Attachment: Goleta Comment Matrix

February 9, 2024
Page 2 of 2

cc: Robert Nisbet, City Manager
Charlie Ebeling, Public Works Director
Nina Buelna, Assistant Public Works Director
Anne Wells, Advance Planning Manager

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments
General Comments		
Global		The regulatory setting includes details regarding County policies but there is no information provided regarding the City of Goleta setting. The EIR must analyze all direct and reasonably foreseeable indirect impacts of the Housing Element, including impacts relating to a change in the pattern of land use or population density. (State CEQA Guidelines, §§ 15126.2(a), §15358(a).) A lead agency's duty to mitigate or avoid its project's significant impacts extends beyond the boundaries of the project area. (See <i>City of Marina v. Board of Trustees of Cal. State University</i> (2006) 39 Cal.4th 341, 359-360; see also <i>Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors</i> (2001) 91 Cal.App.4th 342, 369.) Because Rezone Sites 1-7 and 11 are on the City of Goleta's boundary and will impact City resources, Goleta General Plan / Coastal Land Use Plan policies must be included in the DPEIR and analyzed throughout. Additional mitigation should be included to address consistency with Goleta policy.
Executive Summary		
ES-14 (and Global)	Table ES-3	The impacts listed in the column titled "Impact Classification" needs to reflect the categories explained on page ES-6. Failure to distinguish potentially significant impacts between those that are unmitigable and those that are mitigable obfuscates the impacts of the project as displayed in the Executive Summary. Some specific examples are provided below. The same clarity must also be provided in the individual impact analysis sections.
ES-14	Table ES-3	Impact AV-2 is not identified correctly. Currently, this impact restates Impact AV-3.
ES-15	Table ES-3	In Section 3.2, Impacts AG-1, AG-2, and Cumulative Impacts are all listed as "Significant and unavoidable" but are listed in Table ES-3 as "Potentially significant."
ES-53-54	Table ES-3	The impacts for LU-2 and LU-3 must be listed as "Significant and unavoidable." See comments under Section 3.10.
ES-53	Table ES-3	The Residual Impacts for LU-3 need to be listed as "Significant and unavoidable." See comment under Section 3.10.
ES-54	Table ES-3	In Section 3.10.4.3, the Cumulative Impacts for Land Use and Planning are identified as "Significant and unavoidable" (p. 3.10-64) but are identified as "Potentially significant" in Table ES-3. This discrepancy must be remedied.
ES 65-66	Table ES-3	In Section 3.15.4.2, Impacts USW-1 through USW-4 are listed as significant and unavoidable, but are listed in Table ES-3 as "Potentially significant." Table ES-3 needs to be corrected.
Chapter 1: Introduction		
Section 1.5: Agencies and Roles		
1-6	Table 1-1. Agencies and Roles	The City of Goleta should be added to the "Other Interested Agencies" category due to the fact that many of the impacts analyzed will be borne, at least in part, by the City of Goleta. (See Pub. Resources Code, §21153(a); State CEQA Guidelines, §15086(a) [consultation is required from any city which borders on a city or county within which the project is located].)
Chapter 2: Project Description		
Section 2.3: Housing Element Update		

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments
2-15	Table 2-4	Allowing conversion of agricultural water to residential water for affordable housing projects and the transfer of water credits between properties could impact the City of Goleta's water resources and infrastructure. This could be mitigated by additional water allotments for the Goleta Water District to address these changes. (State CEQA Guidelines, §§ 15121(a), 15126.4(a) [EIR must identify and describe feasible mitigation measures that can minimize each of the project's significant environmental impacts].)
2-17	Scope of Analysis	The EIR must include analysis of Housing Element Program 16 (allowing multifamily in commercial zones) and this program needs to be described in detail and analyzed throughout the EIR. (State CEQA Guidelines, §15378 [project is defined as "the whole of action"]; see <i>Laurel Heights Improvement Ass'n. v. Regents of Univ. of Cal.</i> (1988) 47 Cal.3d 376, 396 [EIR must consider all phases of project].) Assumptions need to be detailed on the increase in development that this program will lead to. This program will likely dramatically change the potential population buildout in this EIR and will thus dramatically impact many sections of the EIR. New mitigation measures, or altered mitigation measures, including those related to transportation and services, may be needed.
2-18	2.3.2 Project Components	Potentially reduced setbacks and an increase in developable area from 30% to 40% for DR could negatively impact the aesthetic quality of the City of Goleta, particularly along borders adjacent to the County's DR rezoned sites. Additionally, these development standard changes would reduce opportunities for on-site open space and thus exacerbate demands for these public services elsewhere. These impacts must be analyzed.
2-30	Potential Housing Growth	Finally, these changes and the reduced open space provided on site, serve to counteract MM LU-1 (which allowed commercial recreational facilities in DR). This analysis must include the mixed-use development potential pursuant to Program 16.
Section 2.4: Required Actions and Approvals		
2-39	2.4 Required Actions and Approvals	The EIR must provide much clearer details on the community plan amendments that are needed to implement this project. These community plan amendments are part of the project, not mitigation for a later date. As such, they need to be made clear in the project description. (State CEQA Guidelines, §15378 [project is defined as "the whole of action"]; see <i>Laurel Heights Improvement Ass'n. v. Regents of Univ. of Cal.</i> (1988) 47 Cal.3d 376, 396 [EIR must consider all phases of project]; <i>Cleveland Nat'l Forest Found. v. San Diego Ass'n. of Gov'ts.</i> (2017) 17 Cal.App.5th 413, 440 [it is not appropriate to defer more specific analysis if such information is available at the program EIR stage or if there is no substantial evidence to support the decision to defer such analysis].) The project must also analyze whether any changes (SEIR, Addendum, etc.) are needed for community plans. Any changes to other CEQA documents to amend community plans must also be included with the Project.
Chapter 3: Environmental Impact Analysis		
Section 3.0: Introduction and Approach to Analysis		

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments
3-4	Impact Assessment Buildout Scenarios	The description of the buildout scenario reflects the development envisioned in the County’s Housing Element, not a reflection of future development in the Project area. This summary omits consideration of projects within incorporated cities, like Goleta. For instance, new housing projects like Heritage Ridge should be included as well as capital projects, like the roundabouts at Highway 217 and Hollister Avenue (now part of Project Connect, but on the City’s CIP list for many years).
3-4	Baseline	A second Notice of Preparation was released on August 11, 2022. This should be noted in this section and any changes in the baseline should be included in the EIR.
Section 3.1: Aesthetics and Visual Resources		
3.1-23, 3.1-25	Impact AV-1 and AV-2	The PDEIR includes no explanation as to how Mitigation Measure MM AV-1 would help address public scenic vistas and visual resources or scenic qualities. (<i>League to Save Lake Tahoe v. County of Placer</i> (2022) 75 Cal.App.5th 63, 121 [courts will not defer to lead agency’s determination that mitigation measure will work when their efficacy is not apparent and there is no evidence in the record showing they will be effective].) The County’s objective design standards do not include specific protections for visual resources. As such, MM AV-1 is an inadequate mitigation measure to address this impact.
3.1-26	Impact AV-3	The EIR must include additional mitigation for Impact AV-3 (and AV-1 and AV-2) that addresses impacts to the surrounding community and scenic resources, as the potential impacts from this project from light and glare are not insignificant. Mitigation must include specific standards related to lighting at the top of, and above, the existing height standards for DR to address new lighting impacts from the taller projects allowed under this Project. Additionally, mitigation is also needed to ensure there is no light trespass as a result of allowing structures closer to property lines under this Project. As the DPEIR notes, “light trespass and glare shall be reduced to the maximum extent feasible.” This is a subjective requirement that is not enforceable on ministerial projects.
Section 3.4: Biological Resources		
3.4-39	MM BIO-2	For MM BIO-2, there is potential for an applicant to argue that the decision for “avoidance, minimization, or compensatory measures” is subjective and thus enforceable. To ensure protection of biological resources, the language of this mitigation measure must be revised to ensure enforceability and protection of critical biological resources, including for several creeks that run through, or adjacent to, sites included in the Project for rezoning.
3.4-39	MM BIO-2	“Compensatory measures” should not be included in MM BIO-2. If the project cannot avoid the impacts, the project design needs to be reconsidered.
3.4-39	MM BIO-2	Allowing a biologist to determine “to the maximum extent feasible” a 100-foot buffer for ground disturbance and vegetation removal from sensitive habitats, watercourses, or riparian habitats is subjective and potentially unenforceable. This language must be revised to ensure the application of the buffer standard is objective and enforceable and protects the resources in question.

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments
3-4.35	Impact BIO-4	The PDEIR concludes that no mitigation is feasible for the conflicts with existing policy and regulation regarding protection of creeks. However, there is potential mitigation for this impact that must be identified as follows. A mitigation measure must be included to revise the relevant policies in the Goleta Community Plan and Eastern Goleta Valley Community Plan to ensure their application to ministerial projects. The timeline for implementation of this measure must be in the next year to ensure new housing development does not sacrifice critical local biological resources.
Section 3.8: Hazards and Hazardous Materials		
3.8-39	MM HAZ-3	This mitigation measure must not be limited as it is written. This requirement must apply to all projects, not just those on County property or qualifying for ministerial review, as application of the newly adopted ALUCP is not currently included in the County's policies or development standards.
3.8-39	MM HAZ-3	MM HAZ-3 must not be limited to ALUCP density, height, and open space standards. This mitigation measure should make clear that new development must comply with the entirety of the ALUCPs.
3.8-39	MM HAZ-3	This mitigation should also explicitly acknowledge the need to comply with FAA requirements, including a Part 77 analysis (which may significantly limit the height of proposed housing development). Figures 7 and 24 of the Eastern Goleta Valley Community Plan will also need updating.
Section 3.10: Land Use and Planning		
3.10-20	Local Regulatory Setting	The regulatory setting includes details regarding County policies but there is no information provided regarding the City of Goleta setting. Because Rezone Sites 1-7 and 11 are on the City of Goleta's boundary and will impact City resources, a section detailing related Goleta General Plan / Coastal Land Use Plan policies must be added and analyzed throughout Section 3.10. Additional mitigation should be included to address consistency with Goleta policy.
3.10-25–63	Impacts LU-2 and LU-3	The analysis of these two impacts does not disclose whether the impacts are “Significant and unavoidable” or “Less than significant with mitigation.” For both impacts, the analysis concludes that mitigation measures would reduce significant impacts, but provides no explanation as to whether or how those mitigation measures could reduce impacts to less than significant. As such, the analysis of Impacts LU-1 and LU-2 must disclose that these impacts, even with mitigation, are significant and unavoidable. Table ES-3 should be updated to reflect this as well.
3.10-25–60	Impact LU-2 and Table 3.10-3.	The analysis of this impact must include Eastern Goleta Valley Community Plan policies TC-EGV-1.1 and TC-EGV-1.2. These policies require level of service standards and long-term improvements to multimodal transportation facilities targeted to provide for these levels of service. Mitigation measures to address impacts due to development that must rely on City of Goleta roadway infrastructure, including execution of an MOU with the City of Goleta for contributions of impacts fees and for the provision of fair-share contributions for City of Goleta capital projects, must be included in the mitigation for any impacts identified. Without such analysis and mitigation, the EIR does not adequately address and analyze this impact.

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments
3.10-28	Table 3.10-3 (and Impact LU-2)	Table 3.10-3 includes no references to the Goleta Community Plan. As such, the analysis provided is entirely inadequate for consideration of Rezone Site No. 11 (Glen Annie).
3.10-63	Impact LU-3	Mitigation for this planning area must be included similar to that noted above, including an MOU with the City of Goleta, to address transportation impacts in Goleta.
3.10-64–65	MM LU-1	This impact must acknowledge that the local streets impacts will be in the City of Goleta. This is made evident by the fact that the development of the South Patterson agriculture block estimated growth would increase average daily trips (ADT) on South Patterson Avenue (a City of Goleta street) by 130 percent.
		MM LU-1, as prepared, is far too broad in scope and vague to the point where the impacts created by this mitigation measure may be significant and unavoidable in their own right. If a mitigation measure identified in an EIR would itself cause significant environmental impacts distinct from the significant effects caused by the project, those impacts must be discussed in the EIR. (State CEQA Guidelines, §15126.4(a)(1)(D).) MM LU-1 must be revised to (1) limit the allowances to the sites considered for rezoning as part of this project; (2) limit the size of commercial development (by square footage and/or size of the project; and (3) only allow with discretionary review. This is needed because there is no way to understand the impacts of this mitigation measure simply by limiting the uses to “neighborhood-serving commercial uses.” The reality is that these uses could vary greatly. For example, a coffee shop can serve the neighborhood, yet also generate significant traffic and impacts to the area that may already be stressed by the significant new residential development. Additionally, by allowing commercial uses in all of DR, the County may potentially contribute to a loss of housing on sites where a property owner chooses to convert existing housing on a DR site to commercial uses. Additionally, the language of the mitigation measure (e.g. “steep slopes,” “may require,” “are compatible,” “an integral part,” “adverse effects on residential uses”) are subjective and therefore unenforceable for ministerial projects. As such, the language needs to be revised unless these uses are reviewed only through a discretionary process.
3.10-65	MM LU-1, (Residual Impacts)	The analysis of secondary impacts for MM LU-1 is purely speculative. The commercial uses could include additional impacts throughout the County on DR designated parcels and must be analyzed. Impacts could include loss of existing housing and new impacts from commercial uses sites throughout the County on sites previously designated only for residential use.
3.10-66	Impact LU-3 (Residual Impacts)	The analysis of this impact does not explain whether the impact is “significant and unavoidable” or “less than significant with mitigation.” The analysis concludes that mitigation measures would reduce significant impacts but provides no explanation as to whether or how those mitigation measures could reduce impacts to less than significant. As such, the analysis of residual impacts of Impact LU-3 must disclose that this impact, even with mitigation, is significant and unavoidable. Table ES-3 should be updated to reflect this as well.

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments
Section 3.12: Population and Housing		
3.12-20	Impact PH-2	This impact must consider the impact of allowing commercial development within the DR zone district and the impacts that could have on displacement of people and housing.
Section 3.13: Public Services and Recreation		
3.13-45	Impact PSR-1	The analysis of this impact includes discussion of impact fees, however, because a new fire station is proposed in the City of Goleta, a mitigation measure needs to be included to provide funding for Fire Station 10, particularly for rezone sites (such as, but not limited to, Glen Annie, Rezone Site No. 11) that will likely rely on service from that station. Add a mitigation requiring an MOU between the County and City of Goleta to ensure fees and payments associated with fire response are appropriately allocated to Fire Station 10. Additionally, a mitigation measure must be added to require the construction of Fire Station 10 prior to any new demand for fire services at Glen Annie (Rezone Site No. 11).
3.13-51	Impact PSR-5	A new mitigation measure needs to be included to reflect the reality that increased housing adjacent to the City of Goleta will increase demand for and pressure on City of Goleta parks. This mitigation measure must include a commitment for the County to provide the City of Goleta with park (and Quimby where applicable) fees collected for County housing projects on rezone sites where the residents will rely on City of Goleta parks and open spaces.
Section 3.14: Transportation		
3.14-9	Table 3.14-4	This table accurately includes Annual Average Daily Trips (AADT) volume and design capacity along Patterson Avenue in the City of Goleta. Because the proposed rezone sites also affect other north-south corridor roadways in the City of Goleta, AADT volume and design capacity needs to be included in Table 3.14-4 for Glen Annie Road (8,000 AADT), Storke Road (35,000 AADT) or Hollister Avenue west of Storke (25,000 AADT). The text summarizing the AADT and design capacity presented in this table also needs to be updated to reflect the addition of these three north-south corridors.
3.14-25	Local Policies	The regulatory setting includes details regarding SBCAG and County settings but there is no information provided regarding the City of Goleta setting. Because Rezone Sites 1-7 and 11 are on the City of Goleta's boundary and will impact City resources, including the City's transportation network, a section detailing related Goleta General Plan / Coastal Land Use Plan policies and analyzed throughout Section 3.14 must be added. Additional mitigation should be included to address consistency with Goleta transportation policies.
3.14-30	Local Policies	Because Sites 1-7 are within the Eastern Goleta Valley Community Plan planning area and Site 11 is within the Goleta Community Plan planning area, the LOS standards from these two planning documents, and other relevant transportation policies from these two plans, must be included and considered in the analysis of impacts in the DPEIR.

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments
3.14-40	Table 3.14-8	<p>Because the project will impact City streets, bike paths, and sidewalks, it must be clarified (in the first paragraph on page 3.14-30) that in addition to the County’s Circulation Element, the Goleta General Plan / Coastal Land Use Plan Transportation Element details standards for LOS.</p> <p>This table summarizes transportation impacts and mitigation measures. Update the table to reflect the additional analysis of City of Goleta transportation policies (not just County) for Impact T-1.</p> <p>Update the table to reflect the new mitigation measure requiring an MOU between the City of Goleta and the County, as detailed in this comment matrix. Such an agreement between the City of Goleta and the County is explicitly identified in the City of Goleta’s General Plan subpolicy LU 12.7(c).</p> <p>The roadways included in this table are inadequate. The data is provided from Appendix E, which serves to analyze noise, not operational traffic safety. This table must also look at impacts to Storke Road and Glen Annie and Hollister Avenue between Fairview and Patterson. This analysis must also include planned CIPs, such as the Hollister Avenue striping project and the 217 ramp roundabouts. Without including these road segments in the analysis, the scope of this impact is unclear.</p> <p>Roadway capacity analysis is critical to understanding the impact of housing on the rezoned sites and how that will impact current and future Goleta capital projects. Additionally, understanding the functionality of Hollister Avenue and Patterson are essential to understanding the viability of access to Goleta Valley Cottage Hospital for emergency services.</p> <p>Add text explaining that in addition to MM T-3 (Funding and Mitigation Fee Programs Update), a mitigation measure requiring the execution of an MOU between the City of Goleta and the County to address the mitigation fee program update.</p> <p>Mitigation measure MM T-1 cannot be required “as feasible.” This language makes the implementation subjective and therefore unenforceable for ministerial projects.</p> <p>Mitigation measure MM T-1 must include reference to City of Goleta planned bike infrastructure, not just projects identified in the County’s ATP.</p> <p>Add a new mitigation measure requiring the execution of an MOU between the City of Goleta and the County to address the mitigation fee program, contributions of impact fees to the City of Goleta, the provision of fair-share contributions for City of Goleta capital projects (see also comment on Impact LU-2), and construction of public infrastructure improvements to mitigation impacts to the transportation network as supported by Land Use Element Policies LU 1.13, LU 11, and LU 12 of the City of Goleta’s General Plan. The program, impact fee contributions, fair-share capital projects contributions, and construction of public infrastructure improvements will address impacts due to development that must rely on City of Goleta transportation network infrastructure. Without such analysis and mitigation, the EIR does not adequately address and analyze this impact.</p>
3.14-54	Impact T-3, Table 3.14-11	
3.14-58	Design Features and Hazards	
3.14-59	MM T-1	
3.14-59	MM T-1	
3.14-59	3.14.4.4	

Santa Barbara County Housing Element Draft Program EIR – City of Goleta Comment Matrix (February 2024)

Page Ref.	Doc. Reference	Comments
3.14-59	3.14.4.4	Section 3.14.4.4 of the DPEIR details proposed transportation mitigation measures. The mitigation measures as presented in the DPEIR do not adequately address the need for safety improvement. Update this section to include safety improvement mitigation measures. At a minimum, address safety improvements at the intersections of Cathedral Oaks and Glen Annie, Hollister and Storke, and Storke and Marketplace, and the street segments of Cathedral Oaks, east of Glen Annie and Patterson north of Hollister. These intersections and street segments have all been identified in the Goleta Traffic Safety Study as high collision locations and must be adequately mitigated in this DPEIR. Include detail in the DPEIR explaining that development on Rezone Sites 1-7 and 11 will increase traffic volumes at these intersection and roadways and will therefore increase the number of collisions at these high-collision locations, thus justifying the need for safety improvement mitigation measures.
3.14-61	MM T-3	This mitigation needs to provide for the inclusion of the City of Goleta in this process and to create a mechanism to provide support for the City of Goleta to update and implement capital projects to accommodate the increased demands for City transportation projects for housing projects in the County that will rely on the Goleta transportation network.
3.14-61	MM T-3	The updated fees must include consideration of the improvements needed in the City of Goleta, as that is where the impacts will occur for many of the rezone sites.
3.14-61	MM T-3	The timing of this item must be brought forward as it is a critical mitigation measure. With the timeline currently outlined, this mitigation measure cannot reduce Impact T-1 to significant but mitigable.
3.14-61	MM T-3	The budget and work program must include this item in the first year. Otherwise, it is likely many projects will move forward without addressing the identified impact.
3.15-34	Table 3.15-10	Section 3.15: Utilities and Water Supply Section 3.16: Wildfire
3.16-35	MM WF-1	This table needs to be corrected to accurately reflect the severity of impacts analyzed in this section. The language of the mitigation needs to change, as shown, to ensure the mitigation measure is objective in nature and thereby applicable: "A larger setback shall may be required if SBCFD determines that a greater distance is required for public and/or firefighter safety."
4-6	Alternatives Selection Methodology	Chapter 4: Alternatives Analysis Section 4.3: Alternatives Selection Methodology
		An EIR's statement of project objectives is the touchstone for selection of alternatives for evaluation. (State CEQA Guidelines, § 15124(b).) The alternatives discussed must be able to attain most of the basic objectives of the project. (State CEQA Guidelines, § 15126.6(b).) Based on the comment below, the environmental analysis of the project needs to include feasible alternatives that meet the project objectives. Alternatives should consider other approaches to meet RHNA, such as further supporting infill redevelopment, incentivizing ADUs to a greater extent, and changing the affordability assumptions for rezone sites to count all units towards lower and/or moderate income (as is allowed under state law) and then include fewer rezone sites.

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Page Ref.	Doc. Reference	Comments
4.26-94	Alternatives 2-5	<p style="text-align: center;">Section 4.5: Alternatives Considered and Analyzed</p> <p>After running the “Balancing Act” online rezoning site selection tool for each of the proposed alternatives, the North County subregion met and exceeded its RHNA targets for all income categories. However, for the South Coast subregion, only Alternative 5 met its RHNA target for all 3 income categories. While the overall RHNA target plus 15% buffer is met for all 4 proposed alternatives, not meeting the South Coast subregion’s RHNA target for 3 out of 4 alternatives renders these alternatives inconsistent with the Project’s objectives. For the one alternative (Reduced Project C) that still meets the RHNA objective, the only large sites adjacent to the City of Goleta that is not included for rezoning is Site No. 1 (Giorgi). However, Giorgi has a builder’s remedy application, thereby making the distinction between this alternative and the proposed project insignificant. Without viable alternatives, the analysis of the EIR is incomplete.</p>